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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jean H. Toal, Circuit Court Judge

Appellate Case No. 2024-001997
Civil Action No. 2022-CP-40-01265

Sarah J. Plant and Parker Plant,Respondents,

v.

Avon Products, Inc., et al.

Of which IMI Fabi (Diana) LLC; IMI Fabi (USA) Inc.; and
IMI Fabi, LLC are theAppellants.

**RESPONDENTS' MOTION FOR *PRO HAC VICE* ADMISSION OF
MISTY A. FARRIS**

Pursuant to RULE 240 AND RULE 404 OF THE SOUTH CAROLINA RULES OF APPELLATE PROCEDURE, Misty A. Farris, through the undersigned counsel, moves to be admitted *Pro Hac Vice* before this Court in the above-entitled action, in order to participate as counsel for Respondents, and in support thereof, states:

1. That she is a member in good standing of the Texas State Bar, admitted before the court of last resort in that state, and has never been the subject of a disciplinary proceeding.

2. This motion is based upon the attached Verified Application for Admission *Pro Hac Vice* of Misty A. Farris, a copy of each of which is attached hereto and

incorporated herein by reference.

WHEREFORE, the undersigned counsel for Respondents moves for the admission *Pro Hac Vice* of Misty A. Farris, as co-counsel in this matter.

s/Theile B. McVey _____

Theile B. McVey (SC Bar 16682)

tmcvey@kassellaw.com

John D. Kassel (SC Bar 03286)

jkassel@kassellaw.com

KASSEL MCVEY

ATTORNEYS AT LAW

1330 Laurel Street

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Columbia, South Carolina. 29202-476

Telephone: 803-256-4242

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Other email: emoultrie@kassellaw.com

June 4, 2025

Columbia, South Carolina

COPY

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA

Please type your answers in the space provided. Provide an answer for every question asked. In your own handwriting, sign in all spaces where a signature is required (no e-signatures). The accompanying certificate of good standing should not be older than 90 days at the time of the filing of this application.

Sarah J. Plant and Parker Plant
Plaintiff

2024-001997
Case No.

South Carolina Court of Appeals
Tribunal

vs.

IMI Fabi (Diana), LLC; IMI Fabi (USA) Inc.; and IMI Fabi, LLC
Defendants.

Mailing Address of Tribunal: 1220 Senate Street
Columbia, South Carolina 29201

Comes now Misty A. Farris, applicant herein, and respectfully represents the following:

1. Applicant resides at:
4810 Tremont St.

Street Address

Dallas

Dallas

Texas

75246

City

County

State

Zip Code

214-738-4514

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Dean Omar Branham Shirley LLP, with offices at

1801 N. Lamar Street, Suite 300

Street Address

Dallas

Dallas

Texas

75202

City

County

State

Zip Code

214-722-5990

214-738-4514

214-722-5991

mfarris@dobslegal.com

Primary Telephone

Cell Phone

Fax Number

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by Sarah J. Plant and Parker Plant to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since November of 1996, Applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of Texas where Applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law. It is not necessary to provide a certificate of good standing from all courts before which you are admitted.

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5. List all courts before which Applicant has been admitted to practice law, including United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and state courts or the District of Columbia.

Court:	Date Admitted:
Texas	11/1/1996
Northern District of Texas	9/8/2000
Supreme Court of the United States	8/26/2002
Court of Appeals, Third Circuit	10/7/2016
Southern District of Texas	9/5/2019
District of Minnesota	8/12/2020
Court of Appeals, Fourth Circuit	05/21/2021
Court of Appeals, Ninth Circuit	03/15/2024

Is Applicant presently a member in good standing of the bars of those courts listed above? List any court named in the preceding paragraph that applicant is no longer admitted to practice before.

Yes

6. Is Applicant presently subject to any suspension or disbarment proceedings, or has Applicant been formally notified of any complaints pending before a disciplinary agency? If yes, give particulars, e.g., jurisdiction, court date.

No

7. Has Applicant had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked? If yes give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.

No.

8. Has Applicant had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked? If yes, give particulars, e.g., date, court, administrative body, date of suspension and reinstatement.

No

9. Please be aware that local counsel must be Rule 403 certified. Local counsel of record associated with Applicant in this case is Theile McVey of the Kassel McVey Attorneys at Law law firm, which has offices at:

1330 Laurel Street, P.O. Box 1476
Street Address

Columbia Richmond SC 29202
City County State Zip Code

803-256-4242 803-582-7070 803-256-1952 tmcvey@kassellaw.com
Primary Telephone Cell Phone Fax Number Email Address

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South Carolina Bar Number
(You must provide Bar Number)

10. Has Applicant previously filed an application to appear *pro hac vice* in South Carolina cases? If yes, give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted.

Yes.

1. *Perry v. American International Industries*, Appellate Case No. 2024-001550. The case is currently pending in the South Carolina Court of Appeals. Application is dated March 7, 2025 and the Order was granted on April 8, 2025. Local counsel is Theile McVey.
2. *Perry v. Johnson & Johnson, et al.*, Appellate Case No. 2025-000065. The case is currently pending in the South Carolina Court of Appeals. Application is dated March 7, 2025 and the Order was granted on April 8, 2025. Local counsel is Theile McVey.

11. Does Applicant agree to comply with the applicable statutes, laws and rules of the State of South Carolina and familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct? Does Applicant consent to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

Yes

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 8th day of May, 2025

W. N. James
APPLICANT

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S.C. SUPREME COURT

VERIFICATION

STATE OF Texas)

COUNTY OF Dallas)

I, Misty A. Farris, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

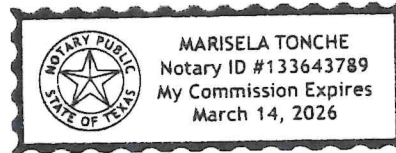
Misty James

APPLICANT/AFFIANT

Subscribed and sworn to before me this 8th day of May, 20 25

Marisela Tonche

(Notary Signature)



Notary Public for the State of Texas

My Commission Expires: March 14, 2026

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 14 day of May, 20

Shirley Markley
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by ~~hand~~mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

14th day of May, 2025



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S.C. SUPREME COURT

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

May 08, 2025

Re: Ms. Misty Ann Farris, State Bar Number 00796532

To Whom It May Concern:

This is to certify that Ms. Misty Ann Farris was licensed to practice law in Texas on November 01, 1996, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

A handwritten signature in black ink, appearing to read "Seana Willing", with a stylized flourish at the end.

Seana Willing
Chief Disciplinary Counsel
SW/jw



The Supreme Court of Texas

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AUSTIN
CLERK'S OFFICE

S.C. SUPREME COURT

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Misty Ann Farris

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 1st day of November, 1996.

I further certify that the records of this office show that, as of this date

Misty Ann Farris

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 8th day of May, 2025.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne
Clerk, Supreme Court of Texas

No. 9008C.1