

RECEIVED

Dec 19 2025

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. 2025-000065  
Civil Action No. 2023-CP-40-04072

Michael L. Perry and Lonnie Long, ..... Respondents,

v.

American International Industries et al.

Of whom Johnson & Johnson; LLT Management, LLC  
f/k/a LTL Management, LLC; Kenvue, Inc.; and Johnson  
& Johnson Holdco (NA), Inc. are the ..... Appellants.

**MOTION FOR ADMISSION *PRO HAC VICE* OF  
MATTHEW BUSH**

Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Blake T. Williams, Esquire, of Nelson Mullins Riley & Scarborough LLP respectfully requests that the Court enter an order permitting Matthew Bush, Esquire, to appear *pro hac vice* in this litigation as additional counsel for Appellants Johnson & Johnson, Inc.; LLT Management, LLC f/k/a LTL Management, LLC; Kenvue, Inc. and Johnson & Johnson Holdco (NA). (collectively the “J&J Defendants”), and would show the Court as follows:

1. Matthew Bush is a member in good standing of the bar of the State of New York. He is an attorney with the law firm of Kirkland & Ellis LLP, 601 Lexington Avenue, New York, NY 10022 and is counsel for Defendants Johnson & Johnson, Inc.; LLT Management, LLC f/k/a LTL Management, LLC; Kenvue, Inc. and Johnson & Johnson Holdco (NA).

2. Mr. Bush is handling this matter in association with C. Mitchell Brown, A. Mattison Bogan, and Blake T. Williams, who are members in good standing of the South Carolina Bar.

3. Undersigned counsel contacted counsel for all parties in this action via email on December 2, 2025, and no party objected to this *pro hac vice* admission.

4. This motion is supported by the verified application for *pro hac vice* admission of Matthew Bush, a copy of which has been submitted to the South Carolina Supreme Court Office of Bar Admissions online system along with a \$250.00 check made payable to the South Carolina Supreme Court, pursuant to Rule 404 of the South Carolina Appellate Court Rules (Ex. A).

Accordingly, the undersigned counsel requests that the Court enter an order permitting the appearance of Matthew Bush Esquire, in this action as additional counsel for Defendants Johnson & Johnson, Inc.; LLT Management, LLC f/k/a LTL Management, LLC; Kenvue, Inc. and Johnson & Johnson Holdco (NA).

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Blake T. Williams

C. Mitchell Brown

S.C. Bar 012872

mitch.brown@nelsonmullins.com

A. Mattison Bogan

S.C. Bar 72629

matt.bogan@nelsonmullins.com

Blake T. Williams

S.C. Bar 100794

blake.williams@nelsonmullins.com

Yasmeen Ebbini

S.C. Bar 104681

yasmeen.ebbini@nelsonmullins.com

1320 Main Street, 17th Floor

Columbia, SC 29201  
(803) 799-2000

Amy M. Pepke – *Pro Hac Vice*  
amy.pepke@kirkland.com  
Kirkland & Ellis  
609 Main St  
Houston, TX 77002  
(713) 836-3600

Matthew L. Bush – *Pro Hac Vice* forthcoming  
matthew.bush@kirkland.com  
Kirkland & Ellis LLP  
601 Lexington Avenue  
New York, NY 10022  
(212) 446-4800

*Attorneys for Appellants Johnson & Johnson, Inc.; Pecos  
River Talc, LLC, formerly known as LLT Management*

Columbia, South Carolina

December 19, 2025

# EXHIBIT A

## LOCAL COUNSEL CONSENT

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

Dated this 19<sup>th</sup> day of December, 2025

*/s/ Blake T. Williams* \_\_\_\_\_

LOCAL COUNSEL OF RECORD

PHV Certification

Dec 04 2025

South Carolina Supreme Court  
Office of Bar Admissions  
1231 Gervais Street  
Columbia, SC 29201  
<https://sctbaradmissions.sccourts.org>



The Supreme Court of South Carolina  
Office of Bar Admissions

PATRICIA A. HOWARD  
CLERK OF COURT

T. KYLE TENNIS  
DEPUTY CLERK

KATHLEEN "TINA" BRYANT  
MANAGER, OFFICE OF BAR  
ADMISSIONS

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA  
29211  
TELEPHONE: (803) 734-1317  
FAX: (803) 734-0394

December 4, 2025

Matthew Lee Bush  
601 Lexington Avenue  
New York, NY 10022

RE: Michael L. Perry, et al. v. Johnson & Johnson, et al.

Appellate Case No. 2025-000065

Dear Applicant:

I certify that the Office of Bar Admissions has received your application for admission pro hac vice in the above action. The \$250 admission fee has been paid.

Sincerely,

T. Kyle Tennis

Deputy Clerk

# Pro Hac Vice Application

Application Submitted on 12.01.2025

## General Information

### Personal Information

Applicant First Name	Matthew
Applicant Middle Name	Lee
Applicant Last Name	Bush
Applicant Suffix	
Applicant Business Address 1	601 Lexington Avenue
Applicant Business Address 2	
Applicant City	New York
Applicant State	New York
Applicant Zip Code	10022
Applicant County	New York
Applicant Primary Phone Number	212 446 4800
Applicant Cell Phone Number	null
Applicant Primary Email	matthew.bush@kirkland.com

### Applicant Firm Information

Applicant Law Firm Name	Kirkland & Ellis LLP
Applicant Law Firm Address 1	601 Lexington Ave.
Address 2	
City	New York
State	NY
Zip Code	10022
Applicant Law Firm County	New York
Applicant Law Firm Phone Number	2124464800
Applicant Law Firm Email	Matthew.Bush@kirkland.com

### Case Information

Plaintiff Name	Michael L. Perry
----------------	------------------

Defendant Name	Johnson & Johnson
Case Name	Perry v. Johnson & Johnson
Case Number (Please include all zeros in case number)	2025-000065
Applicant Retained By	Johnson & Johnson, LLT Management, LLC f/k/a LTL Management, LLC, Kenvue, Inc., and Johnson & Johnson Holdco (NA), Inc.
Tribunal	South Carolina Court of Appeals
Tribunal Address 1	1220 Senate St.
Address 2	
City	Columbia
State	South Carolina
Zip Code	29201

**Local Counsel Information**

Are you filing a pro hac vice application to appear in an arbitration, mediation, or alternative dispute resolution? No

**Please be aware that local counsel must be Rule 403 certified.**

Local Counsel First Name	Blake
Local Counsel Last Name	Williams
Local Counsel Bar Number	100794
Local Counsel Law Firm Name	Nelson Mullins Riley & Scarborough LLP
Local Counsel Law Firm Address 1	1320 Main Street,
Address 2	17th Floor
City	Columbia
State	SC
Zip Code	29201
Local Counsel Law Firm County	Richland
Local Counsel Primary Phone Number	8037992000
Local Counsel Cell Phone Number	8039608692
Local Counsel Email	blake.williams@nelsonmullins.com

**Jurisdictions/Courts****Jurisdictions/Courts**

**List all courts before which you have 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.**

**NOTE:** You will be required to upload **one** certificate of good standing dated within the last 90 days from the highest court of the District of Columbia or the State where the applicant regularly practices law.

**NOTE:** If you are filing a pro hac vice application to appear in an arbitration, mediation, or other alternative dispute resolution proceeding in South Carolina, the certificate of good standing you are required to upload must be from the jurisdiction where your pre-existing representation of a client is located.

Court Name	All New York Courts
Jurisdiction	New York
Date Admitted	10-2013
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Supreme Court
Jurisdiction	United States Supreme Court
Date Admitted	10-2016
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Court of Appeals For The Second Circuit
Jurisdiction	Second Circuit
Date Admitted	9-2016
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Court of Appeals for the Federal Circuit
Jurisdiction	Federal Circuit
Date Admitted	2-2017
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Court of Appeals for the Ninth Circuit
Jurisdiction	Ninth Circuit
Date Admitted	9-2017
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States Court of Appeals for the Third Circuit
Jurisdiction	Third Circuit
Date Admitted	10-2024
Are you presently a member in good standing of the bar of this court?	Yes

Court Name	United States District Court for the Southern District of New York
Jurisdiction	Southern District of New York
Date Admitted	2-2018
Are you presently a member in good standing of the bar of this court?	Yes

Are you presently subject to any suspension or disbarment proceedings, or been formally notified of any complaints pending before a disciplinary agency? No

**Prior Pro Hac Vice Applications**

**Prior Pro Hac Vice Applications**

Have you previously filed an application to appear Pro Hac Vice in any South Carolina cases? No

Have you ever had any application for admission Pro Hac Vice denied or any Pro Hac Vice admission revoked in this or any other jurisdiction? No

**NOTE:** You must upload a copy of any order of denial or revocation.

Have you ever had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked? No

**Attestations**

**Attestations**

Applicant agrees to comply with the applicable statutes, law and rules of the State of South Carolina; be familiar with and comply with the South Carolina Rules of Professional Conduct. I Agree

Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct. I Consent

Type name in the box to sign electronically Matthew Bush

**Signed on this date: 12/01/2025 12:41:08**

Type in Date 12-1-2025

RECEIVED

Dec 19 2025

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. 2025-000065

Michael L. Perry and Lonnie Long,..... Respondents,

v.

American International Industries et al.

Of whom Johnson & Johnson; LLT Management, LLC  
f/k/a LTL Management, LLC; Kenvue, Inc.; and Johnson  
& Johnson Holdco (NA), Inc. are the ..... Appellants.

**PROOF OF SERVICE**

I, the undersigned, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellants, do hereby certify that I have served all counsel of record in this action with a copy of the document(s) set forth below under Supreme Court Order dated April 24, 2024.

PLEADING(s): Motion for Admission Pro Hac Vice of Matthew Bush

Counsel Served: **Via Electronic Mail**

Theile B. McVey, Esquire  
John D. Kassel, Esquire  
Jamie Rae Rutkoski, Esquire  
Kassel McVey, Attorneys at Law  
1330 Laurel Street  
Columbia, SC 29201  
[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)  
[jkassel@kassellaw.com](mailto:jkassel@kassellaw.com)  
[jrutkoski@kassellaw.com](mailto:jrutkoski@kassellaw.com)  
[EMoultrie@kassellaw.com](mailto:EMoultrie@kassellaw.com)  
[lmoultrie@kassellaw.com](mailto:lmoultrie@kassellaw.com)

Charles William Branham, III, Esquire

Rachel Gross, Esquire  
Misty A. Farris, Esquire (admitted Pro Hac Vice)  
Ka'Leya Q. Hardin, Esquire (admitted Pro Hac Vice)  
Dean Omar Branham Shirley, LLP  
1801 North Lamar Street, Suite 300  
Dallas, TX 75202  
[tbranham@dobslegal.com](mailto:tbranham@dobslegal.com)  
[rgross@dobslegal.com](mailto:rgross@dobslegal.com)  
[mfarris@dobslegal.com](mailto:mfarris@dobslegal.com)  
[khardin@dobslegal.com](mailto:khardin@dobslegal.com)  
[lshirley@dobslegal.com](mailto:lshirley@dobslegal.com)  
[rgarner@dobslegal.com](mailto:rgarner@dobslegal.com)  
[tgilliland@dobslegal.com](mailto:tgilliland@dobslegal.com)

David Humen, Esquire  
Dean, Omar & Branham, LLP  
4146 Mapleridge Dr  
Grapevine, TX 76051  
[dhumen@dobslegal.com](mailto:dhumen@dobslegal.com)  
[spepin@dobslegal.com](mailto:spepin@dobslegal.com)  
[rmartinez@dobslegal.com](mailto:rmartinez@dobslegal.com)

*Attorneys for Respondents*



Eileen Hindman  
Administrative Assistant

December 19, 2025