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APR 09 2018

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

**APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas**

**Jean H. Toal, Chief Justice of the South Carolina Supreme Court (Retired)  
Acting as Circuit Court Judge**

**Appellate Case No.: 2017-002611  
C/A No.: 2016-CP-42-1592**

**Beverly Dale Jolly and  
Brenda Rice Jolly, ..... Respondents,**

**v.**

**General Electric Company, et al., ..... Defendants,**

**Of whom Fisher Controls International LLC  
and Crosby Valve, LLC are the ..... Appellants.**

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 404 of the *South Carolina Rules of Appellate Procedure*, Lisa White Shirley, 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 Plaintiffs, and in support thereof, states:

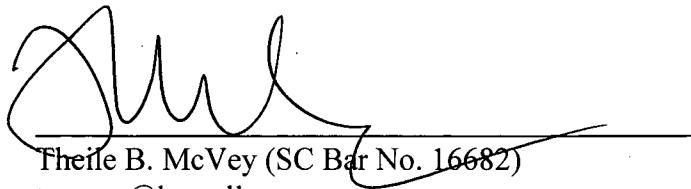
1. That Lisa White Shirley is a member in good standing of the Texas State Bar, admitted before the court of last resort in that state, and has never been the subject of a disciplinary proceeding.

2. This motion is based upon the attached Verified Application for Admission *Pro Hac Vice* of Lisa W. Shirley.

3. Respondents have consulted with Appellants to determine if there is any objection to this Motion and were informed that there is no objection.

4. A proposed *ex parte* Order is attached.

WHEREFORE, the undersigned counsel for Plaintiffs moves for the admission *Pro Hac Vice* of Lisa White Shirley, as co-counsel in this matter.



Therie B. McVey (SC Bar No. 16682)

[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)

John D. Kassel (SC Bar No. 03286)

[jkassel@kassellaw.com](mailto:jkassel@kassellaw.com)

**KASSEL MCVEY ATTORNEYS AT LAW**

1330 Laurel Street

Post Office Box 1476

Columbia, South Carolina 29202-1476

803-256-4242

803-256-1952

ATTORNEYS FOR PLAINTIFFS

April 9, 2015

Columbia, South Carolina.



Court:	Date Admitted:
USDC of Florida - Middle District	2001
USDC of Florida - Northern District	2001
USDC of Florida - Southern District	2001
USDC of Louisiana - Eastern District	2007

(Con't on attached page)

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/a

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/a

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/a

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

~~N/a~~ See attached.

9. Local counsel of record associated with applicant in this case is Theille B. McVey of the Kassel McVey law firm, which has offices at:

1330 Laurel Street

Street Address

Columbia Richland SC 29202

City County State Zip Code

803-256-4242 803-256-1952 tmcvey@kassellaw.com

Primary Telephone Cell Phone Fax Number Email Address

16682

South Carolina Bar Number

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (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).

N/a

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

**5. CONTINUED**

<b>COURT of ADMISSION</b>	<b>YEAR ADMITTED</b>
TX State Bar No. 24052971	4/20/2006
FL State Bar No. 478725	2001
LA State Bar No. 26511	1999
U.S. District Court of Florida – Middle	2001
U.S. District Court of Florida – Northern	2001
U.S. District Court of Florida – Southern	2001
U.S. District Court of Louisiana – Eastern	2007
U.S. District Court of Louisiana – Western	2008
U.S. Court of Appeals – 11th Circuit	2001
U.S. Court of Appeals – 6th Circuit	2006
U.S. Court of Appeals – 7th Circuit	2010
U.S. Court of Appeals – 5th Circuit	2011
U.S. Court of Appeals – 2nd Circuit	2014
U.S. Supreme Court	2017

**8. CONTINUED**

Lisa White Shirley

Statement in Support of Motion for Admission *Pro Hac Vice*

I had a Continuing Legal Education Requirement (“CLER”) delinquency with the Florida State Bar from November 27, 2013, to December 17, 2013, during which time I could not practice law in the State of Florida until I satisfied by continuing legal education requirements. The letter notifying me of the delinquency, and the letter removing the delinquency, are attached.



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

November 27, 2013

CERTIFIED MAIL #7196 9008 9111 2074 971, RRR

Ms. Lisa White Shirley  
Simon Greenstone Panatier Bartlet  
3232 McKinney Ave., Ste. 610  
Dallas, TX 75204-8583

Dear Ms. Shirley:

Your CLER reporting date was 10/31/2013.

By not completing and reporting your hours to The Florida Bar, you are now in noncompliance with the Continuing Legal Education Requirement and therefore a delinquent member in accordance with Rule 6-10.5(a), Rules Regulating The Florida Bar. **As defined in Rule 1-3.4(a), a "delinquent member shall not engage in the practice of law in this state and shall not be entitled to any privileges and benefits accorded to members of The Florida Bar in good standing..."**

We assume this is an oversight. However, under the Supreme Court Rules, in order to correct your CLER delinquency, you must complete the required 30 general hours, including 5 hours of ethics, professionalism, substance abuse or mental illness awareness, or show eligibility to claim an exemption. Additionally, you must complete the enclosed Petition for Removal of CLER Delinquency and return it with the required fee of \$150. Please make your check payable to The Florida Bar.

We urge you to respond promptly, as removal of your CLER delinquency depends upon completion of the required hours or proof of eligibility to claim an exemption, receipt of your properly executed petition, and payment of the required fee.

**You should also be aware that Rule 1-3.7(d) provides that members who have been deemed delinquent for a period of 5 years or longer shall not be reinstated except upon application to and approval by the Florida Board of Bar Examiners. This may be the only notice you receive advising you of this provision.**

If you have any questions, please contact CLER staff at 850/561-5842. They are ready to assist you with this matter.

Thank you for your attention to this matter.

Cordially yours,

John F. Harkness, Jr.

JFHjr;MI/ssT5:D102

Enclosure



## The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

850/561-5600  
[www.FLORIDABAR.org](http://www.FLORIDABAR.org)

February 18, 2014

Bar number: 478725  
Ms. Lisa W. Shirley  
Simon Greenstone Panatier Bartlet  
3232 McKinney Ave., Suite 610  
Dallas, TX 75204

Dear Ms. Shirley:

We have received your request for the removal of your CLER delinquency for your previous reporting period which ended October 31, 2013.

Your petition has been approved and as of December 17, 2013 your CLER delinquency has been removed, thereby making you eligible to practice law in this jurisdiction.

Your current CLER reporting period began November 1, 2013 and will end October 31, 2016. By that time, you will need to have reported another 30 general hours of CLE with 5 hours in ethics, professionalism, substance abuse, or mental illness awareness credit.

If you have further questions, please contact our CLER department at (850) 561-5842.

Cordially yours,

John F. Harkness, Jr.

JFH/clr

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

DATED this 4<sup>th</sup> day of April, 20 18

Ann W. Shirley  
APPLICANT

**VERIFICATION**

STATE OF Texas )

COUNTY OF Dallas )

I, Lisa W. Shirley, 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.

Lisa W. Shirley  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 4<sup>th</sup> day of April, 20 18

Teresa Gilliland

Notary Public for the State of Texas  
My Commission Expires: 3/13/2019



**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 9 day of April, 20 18

[Signature]  
LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

~~mail~~ <sup>hand</sup> I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by ~~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 10<sup>th</sup> day of April, 20 18

[Signature]  
APPLICANT/AFFIANT

# The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

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

**Lisa White Shirley**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 20th day of April, 2006.

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

**Lisa White Shirley**

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

**IN TESTIMONY WHEREOF** witness my hand

and the seal of the Supreme Court of Texas at the City of Austin, this, the 27th day of March, 2018.

BLAKE HAWTHORNE, Clerk

by Blanca E. Valdez

Blanca E. Valdez, Deputy Clerk

No. 032718CC

**Elizabeth Moultrie**

---

**From:** Matt Bogan <Matt.Bogan@nelsonmullins.com>  
**Sent:** Monday, April 09, 2018 12:54 PM  
**To:** Elizabeth Moultrie  
**Cc:** Jase Glenn; Mitch Brown; Nick Charles; Theile McVey; Jonathan Holder; Lisa Shirley  
**Subject:** Re: Jolly v. General Electric (Fisher Controls and Crosby Valve Appeal)

No objection.  
Matt

Sent from my iPhone

On Apr 9, 2018, at 11:45 AM, Elizabeth Moultrie <[EMoultrie@kassellaw.com](mailto:EMoultrie@kassellaw.com)> wrote:

Dear Counsel:

Respondents are filing a Motion for Admission *Pro Hac Vice* for the admission of Lisa Shirley in this appeal. Please let me know if you have any objection.

Yours truly,

*Elizabeth Eason Moultrie*

Senior Paralegal to John D. Kassel  
and Theile B. McVey  
KASSEL McVEY ATTORNEYS AT LAW  
1330 Laurel Street  
Post Office Box 1476  
Columbia, South Carolina 29202-1476  
803-256-4242  
803-256-1952 (Facsimile)

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General Electric Company, et al., ..... Defendants,

Of whom Fisher Controls International LLC  
and Crosby Valve, LLC are the ..... Appellants.

CERTIFICATE OF SERVICE

I, Elizabeth C. Moultrie, do hereby certify that on the 9 day of April 2018, I served upon Appellants FISHER CONTROLS INTERNATIONAL, LLC and CROSBY VALVE, LLC, a true and correct copy of Respondents' MOTION FOR PRO HAC VICE ADMISSION and proposed ORDER GRANTING PRO HAC VICE ADMISSION by email and by first class mail on all counsel of record in the appeal.

  
Elizabeth C. Moultrie

April 9, 2018

Columbia, South Carolina.