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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SEP 28 2018

SC Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Jean Hoefler Toal, Chief Justice of the SC Supreme Court (Retired)  
Acting as Circuit Court Judge

Appellate Case Number 2018-000385

Timothy W. Howe, Individually and as Personal Representative of the Estate  
of Wayne Erwin Howe, Deceased, and Jeanette Howe . . . . . Respondents,

v.

Air & Liquid Systems Corp., Individually and as success-in-interest to Buffalo Pumps, Inc.; Airco, Inc.; Airgas USA, LLC f/k/a National Welding Supply, Inc.; Albany International Corp.; Asten-Johnson, Inc.; Aurora Pump Company; A.W. Chesterton Company; Beloit Corporation; Black Clawson Converting Machinery, LLC, Individually and as a subsidiary of Davis-Standard LLC; CBS Corporation, A Delaware Corporation f/k/a Viacom, Inc., Successor by merger to CBS Corporation, a Pennsylvania Corporation, f/k/a Westinghouse Electric Corporation; CGR Products, Inc., f/k/a Carolina Gasket and Rubber Company; CNA Holdings, Inc., f/k/a Hoechst Celanese Corporation (sued individually and as successor-in-interest to Fiber Industries, Inc.); Cleaver Brooks, Inc.; Covil Corporation; Crane Co.; Crown Cork & Seal Company, Inc.; Daniel International Corporation; Davis Standard Corporation, LLC; DeZurik, Inc. d/b/a DeZurik-APCO Willamette Eagle, Inc.; Fisher-Klosterman, Inc., as successor-in-interest to Buell Engineering Co.; Flowserve Corporation, Individually and as successor-in-interest to Durco Pumps; Fluor Daniel Services Corporation; Foster Wheeler Energy Corporation; General Electric Company; the Gorman Rupp Company; Goulds Pumps Incorporated; Ingersoll-Rand Company; Linde, LLC f/k/a The Boc Group, Inc., f/k/a Airco, Inc.; Marsulex Environmental Technologies Corporation, Individually and as successor-in-interest to Buell Engineering Co.; Metropolitan Life Insurance Company, a wholly-owned subsidiary of MetLife, Inc.; Peerless Pump Company; Presnell Insulation, Inc.; Riley Power, Inc., Individually and as success-in-interest to Babcock Borsig Power, Inc., and Riley Stoker Corporation, Individually and as successor-in-interest to D.B. Riley; SCAPA Waycross, Inc.; Sepco Corporation, SPX Cooling Technologies, Inc., f/k/a Marley Cooling Technologies, Inc., f/k/a The Marley Cooling Tower Co.; Sterling Fluid

Systems (USA) LLC; Trane U.S., Inc. f//a American Standard, Inc. f/k/a American Radiator & Standard Manufacturing Company; Union Carbide Corporation; Uniroyal, Inc. f/k/a United States Rubber Company, Inc.; United Conveyor Corporation; Velan Valve Corp; Viking Pump, Inc.; Warren Pumps LLC; Yuba Heat Transfer Corporation; Zurn Industries, Defendants,

Of which Covil Corporation is the Appellant.  
AND

Roxanne Falls, Individually and as Personal Representative of the Estate of Charlotte Gaye Smith ..... Respondent,

v.

CBS Corporation, a Delaware corporation f/k/a Viacom, Inc., successor by merger to CBS Corporation, a Pennsylvania Corporation f/k/a Westinghouse Electric Corporation; CNA Holdings, Inc. f/k/a Hoechst Celanese Corporation, sued individually and a successor-in-interest to Fiber Industries, Inc.; Cleaver-Brooks, Inc.; Covil Corporation; Daniel International Corporation; Fluor Daniel, Inc. f/k/a Daniel Construction Company, Inc.; Fluor Daniel Services Corporation; Foster Wheeler Energy Corporation; General Electric Company; MP Supply, Inc. f/k/a Mill-Power Supply Co. and Mill Power Supply Company; Resolute FP US, Inc.; Union Carbide Corporation; United States Fidelity Guaranty Company; Uniroyal, Inc. f/k/a United States Rubber Company, Inc. and United Conveyor Corporation, Defendants,

Of which Covil Corporation is the Appellant.

AND

James Coleman Sizemore, as Personal Representative of the Estate of James Calvin Sizemore, Decedent ..... Respondent,

v.

Bowater Paper Mill; E.I. Du Pont De Nemours and Company; Foster Wheeler Energy Corporation; Daniel International Corporation f/k/a Daniel Construction Company, Inc.; Resolute FP US Inc. f/k/a Bowater Incorporated; CBS Corporation, A Delaware Corporation f/k/a Viacom, Inc. successor-by-merger to CBS Corporation, A Pennsylvania Corporation f/k/a Westinghouse Electric Corporation; Cleaver-Brooks, Inc f/k/a Aqua-Chem, Inc. d/b/a Cleaver-Brooks Division; Covil Corporation; Fluor Constructors International f/k/a Fluor Corporation; Fluor Constructors International, Inc.;

Fluor Daniel Services Corporation; Fluor Enterprises, Inc.; General Electric Company d/b/a Rayloc a/k/a NAPA; Georgia-Pacific Consumer Products LP; Honeywell International, Inc. f/k/a Allied-Products Liability Signal, Inc., sued as successor-in-interest to Bendix Corporation; SCANA Corporation d/b/a South Carolina Electric & Gas; Riley Power, Inc. f/k/a Riley Stoker Corporation and D.B. Riley, Inc.,

AND

Waste Management of South Carolina, Inc., successor by merger to USA Waste of South Carolina, Inc., successor by merger to Chambers Medical Technologies, Inc., Defendants,

Of which Covil Corporation is the Appellant.

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**RESPONDENTS' MOTION FOR PRO HAC VICE  
ADMISSION OF RENEE MELANCON AND LISA WHITE SHIRLEY**

---

Theile B. McVey (SC Bar 16682)  
[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)  
John D. Kassel (SC Bar 03286)  
[jkassel@kassellaw.com](mailto:jkassel@kassellaw.com)  
KASSEL McVEY ATTORNEYS AT LAW  
1330 Laurel Street  
Post Office Box 1476  
Columbia, South Carolina 29202-476  
803-256-4242  
803-256-1952 (Facsimile)  
Other email: [emoultrie@kassellaw.com](mailto:emoultrie@kassellaw.com)

ATTORNEYS FOR RESPONDENTS

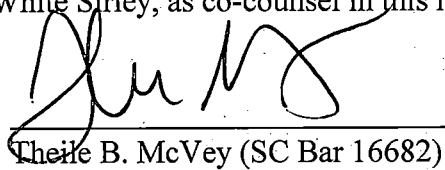
**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 240 and Rule 404 of the *South Carolina Rules of Appellate Procedure*, Renee Melancon and Lisa White Shirley, through the undersigned counsel, each move 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 each is a member in good standing of the Texas State Bar, admitted before the court of last resort in that state, and neither has ever been the subject of a disciplinary proceeding.

2. This motion is based upon the attached Verified Applications for Admission *Pro Hac Vice* of Renee Melancon and Lisa White Shirley, 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 Renee Melancon and Lisa White Shirley, as co-counsel in this matter.



Theile B. McVey (SC Bar 16682)

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

John D. Kassel (SC Bar 03286)

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

KASSEL McVEY ATTORNEYS AT LAW

1330 Laurel Street

Post Office Box 1476

Columbia, South Carolina 29202-476

803-256-4242

803-256-1952 (Facsimile)

Other email: [emoultrie@kassellaw.com](mailto:emoultrie@kassellaw.com)

ATTORNEYS FOR RESPONDENTS

September 28, 2019

Columbia, South Carolina.

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

Timothy Howe, et al.	2015-CP-4603456	South Carolina Court of Appeals
Plaintiff	Case No.	Tribunal
vs.		
Air & Liquid Systems Corporation, et al.	Mailing Address of Tribunal:	Post Office Box 11629
Defendant		Columbia, SC 29211

Comes now Renee Melancon, applicant herein, and respectfully represents the following:

1. Applicant resides at:

3620 Banks Circle

Street Address	Collin	TX	75025
Plano	County	State	Zip Code
City	214-722-5990		
Telephone			

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Dean Omar & Branham, LLP, with offices at

302 N. Market Street, Suite 300, Dallas, TX 75202

Street Address	Dallas	TX	75202
Dallas	County	State	Zip Code
City	214-722-5990	214-722-5991	rmelancon@dobllp.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

Timothy W. Howe, et al. 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 May of 2002, 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.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
State Bar of Texas	2002
State Bar of Louisiana	2006
5th Circuit Court	2017

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Page 1 of 4

S.C. SUPREME COURT

Court:	Date Admitted:

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.)

Not applicable.

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):

Not applicable

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):

Not applicable

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):

Not applicable

9. Local counsel of record associated with applicant in this case is Theile 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).

Not applicable

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.

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

DATED this 25<sup>th</sup> day of July, 2018

  
APPLICANT

**VERIFICATION**

STATE OF Texas  
COUNTY OF Dallas

I, Renee Melancon, 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.

[Signature]  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 25th day of July, 20 18

[Signature]

Notary Public for the State of Texas  
My Commission Expires: 3-13-19



**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 30 day of July, 20 18

[Signature]  
LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

hand 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

30th day of July, 20 18

[Signature]  
APPLICANT/AFFIANT

# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

June 28, 2018

Re: Ms. Renee Marie Melancon, State Bar Number 24034573

To Whom It May Concern:

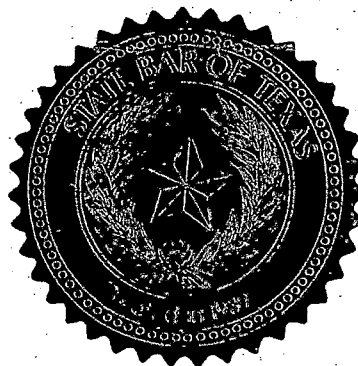
This is to certify that Ms. Renee Marie Melancon was licensed to practice law in Texas on May 03, 2002, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; 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 "L. Acevedo", with a stylized flourish at the end.

Linda A. Acevedo  
Chief Disciplinary Counsel  
LA/web



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

<u>Timothy Howe, et al.</u>	<u>2015-CP-4603456</u>	<u>South Carolina Court of Appeals</u>
Plaintiff	Case No.	Tribunal
vs.		
<u>Air &amp; Liquid Systems Corporation, et al.</u>		<u>Post Office Box 11629</u>
Defendant		<u>Columbia, SC 29211</u>
Mailing Address of Tribunal:		

Comes now Lisa White Shirley, applicant herein, and respectfully represents the following:

1. Applicant resides at:

221 E. Edgefield Avenue

<u>Dallas</u>	<u>Dallas</u>	<u>TX</u>	<u>75208</u>
Street Address	City	State	Zip Code
<u>214-542-5596</u>			
Telephone			

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JUN - 7 2018  
S.C. SUPREME COURT

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Dean Omar & Branham, LLP, with offices at

302 N. Market Street, Suite 300, Dallas, TX 75202

<u>Dallas</u>	<u>Dallas</u>	<u>TX</u>	<u>75202</u>
Street Address	City	State	Zip Code
<u>214-722-5990</u>		<u>214-722-5991</u>	<u>lshirley@dobllp.com</u>
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

Timothy W. Howe, et al. 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 April of 2006, 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.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
State Bar of Texas	2006
State Bar of Louisiana	1999
State Bar of Florida	2001

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

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.)

Not applicable.

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):

Not applicable

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):

Not applicable

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):

See attached

9. Local counsel of record associated with applicant in this case is Theile 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).

Jolly et al. v. GE Company, et al.; appeal; 4/10/18; Theile McVey of Kassel McVey; granted

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.

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

DATED this 12<sup>th</sup> day of April, 2019

David 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 12 day of April, 20 18

Teresa Gilliland

Notary Public for the State of Texas  
My Commission Expires: 3/13/19



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 12th day of June, 20 18

[Signature]  
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

hand 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 12th day of June, 20 18

Lisa W. Shirley  
APPLICANT/AFFIANT

**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 32309-2300

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

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SC Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

Jean Hoefler Toal, Chief Justice of the SC Supreme Court (Retired)  
Acting as Circuit Court Judge

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Appellate Case Number 2018-000385

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Timothy W. Howe, Individually and as Personal Representative of the Estate  
of Wayne Erwin Howe, Deceased, and Jeanette Howe . . . . . Respondents,

v.

Air & Liquid Systems Corp., Individually and as success-in-interest to Buffalo Pumps, Inc.; Airco, Inc.; Airgas USA, LLC f/k/a National Welding Supply, Inc.; Albany International Corp.; Asten-Johnson, Inc.; Aurora Pump Company; A.W. Chesterton Company; Beloit Corporation; Black Clawson Converting Machinery, LLC, Individually and as a subsidiary of Davis-Standard LLC; CBS Corporation, A Delaware Corporation f/k/a Viacom, Inc., Successor by merger to CBS Corporation, a Pennsylvania Corporation, f/k/a Westinghouse Electric Corporation; CGR Products, Inc., f/k/a Carolina Gasket and Rubber Company; CNA Holdings, Inc., f/k/a Hoechst Celanese Corporation (sued individually and as successor-in-interest to Fiber Industries, Inc.); Cleaver Brooks, Inc.; Covil Corporation; Crane Co.; Crown Cork & Seal Company, Inc.; Daniel International Corporation; Davis Standard Corporation, LLC; DeZurik, Inc. d/b/a DeZurik-APCO Willamette Eagle, Inc.; Fisher-Klosterman, Inc., as successor-in-interest to Buell Engineering Co.; Flowserve Corporation, Individually and as successor-in-interest to Durco Pumps; Fluor Daniel Services Corporation; Foster Wheeler Energy Corporation; General Electric Company; the Gorman Rupp Company; Goulds Pumps Incorporated; Ingersoll-Rand Company; Linde, LLC f/k/a The Boc Group, Inc., f/k/a Airco, Inc.; Marsulex Environmental Technologies Corporation, Individually and as successor-in-interest to Buell Engineering Co.; Metropolitan Life Insurance Company, a wholly-owned subsidiary of MetLife, Inc.; Peerless Pump Company; Presnell Insulation, Inc.; Riley Power, Inc., Individually and as success-in-interest to Babcock Borsig Power, Inc., and Riley Stoker Corporation, Individually and as successor-in-interest to D.B. Riley; SCAPA Waycross, Inc.; Sepco Corporation, SPX Cooling Technologies, Inc., f/k/a Marley Cooling Technologies, Inc., f/k/a The Marley Cooling Tower Co.; Sterling Fluid

Systems (USA) LLC; Trane U.S., Inc. f/a American Standard, Inc. f/k/a American Radiator & Standard Manufacturing Company; Union Carbide Corporation; Uniroyal, Inc. f/k/a United States Rubber Company, Inc.; United Conveyor Corporation; Velan Valve Corp; Viking Pump, Inc.; Warren Pumps LLC; Yuba Heat Transfer Corporation; Zurn Industries, Defendants,

Of which Covil Corporation is the Appellant.  
AND

Roxanne Falls, Individually and as Personal Representative of the Estate of Charlotte Gaye Smith ..... Respondent,

v.

CBS Corporation, a Delaware corporation f/k/a Viacom, Inc., successor by merger to CBS Corporation, a Pennsylvania Corporation f/k/a Westinghouse Electric Corporation; CNA Holdings, Inc. f/k/a Hoechst Celanese Corporation, sued individually and a successor-in-interest to Fiber Industries, Inc.; Cleaver-Brooks, Inc.; Covil Corporation; Daniel International Corporation; Fluor Daniel, Inc. f/k/a Daniel Construction Company, Inc.; Fluor Daniel Services Corporation; Foster Wheeler Energy Corporation; General Electric Company; MP Supply, Inc. f/k/a Mill-Power Supply Co. and Mill Power Supply Company; Resolute FP US, Inc.; Union Carbide Corporation; United States Fidelity Guaranty Company; Uniroyal, Inc. f/k/a United States Rubber Company, Inc. and United Conveyor Corporation, Defendants,

Of which Covil Corporation is the Appellant.

AND

James Coleman Sizemore, as Personal Representative of the Estate of James Calvin Sizemore, Decedent ..... Respondent,

v.

Bowater Paper Mill; E.I. Du Pont De Nemours and Company; Foster Wheeler Energy Corporation; Daniel International Corporation f/k/a Daniel Construction Company, Inc.; Resolute FP US Inc. f/k/a Bowater Incorporated; CBS Corporation, A Delaware Corporation f/k/a Viacom, Inc. successor-by-merger to CBS Corporation, A Pennsylvania Corporation f/k/a Westinghouse Electric Corporation; Cleaver-Brooks, Inc f/k/a Aqua-Chem,

Inc. d/b/a Cleaver-Brooks Division; Covil Corporation; Fluor Constructors International f/k/a Fluor Corporation; Fluor Constructors International, Inc.; Fluor Daniel Services Corporation; Fluor Enterprises, Inc.; General Electric Company d/b/a Rayloc a/k/a NAPA; Georgia-Pacific Consumer Products LP; Honeywell International, Inc. f/k/a Allied-Products Liability Signal, Inc., sued as successor-in-interest to Bendix Corporation; SCANA Corporation d/b/a South Carolina Electric & Gas; Riley Power, Inc. f/k/a Riley Stoker Corporation and D.B. Riley, Inc.,

AND

Waste Management of South Carolina, Inc., successor by merger to USA Waste of South Carolina, Inc., successor by merger to Chambers Medical Technologies, Inc., Defendants,

Of which Covil Corporation is the Appellant.

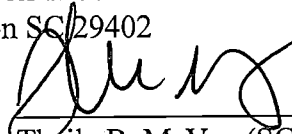
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**CERTIFICATE OF SERVICE**

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I certify that on this 28 day of September 2018 I have served a copy of Respondents Motion for *Pro Hac Vice* Admission of Renee Melancon and Lisa White Shirley on counsel for Appellants by depositing a true and correct copy in the United States Mail, First Class, with the return address clearly printed on the envelope, postage prepaid and addressed to:

Morgan S. Templeton  
Mark H. Wall  
Wall Templeton & Haldrup, PA  
P O Box 1200  
Charleston SC 29402



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ATTORNEYS FOR RESPONDENTS

September 28, 2019

Columbia, South Carolina.