

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HAMPTON COUNTY AND YORK COUNTY
Court of Common Pleas

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

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SC Court of Appeals

Appellate Case No. 2018-000618

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

v.

Bowater Paper Mill; E.I. DuPont De Nemours and Company; Foster Wheeler Energy Corporation; Daniel International Corporation; Resolute FP US, Inc.; CBS Corporation; Cleaver Brooks, Inc.; Covil Corporation; Fluor Daniels Services Corporation; Fluor Enterprises, Inc.; General Electric Company; Genuine Parts Company; Georgia-Pacific Consumer Products LP; Honeywell International, Inc.; SCANA Corporation; Riley Power, Inc., and Waste Management of South Carolina, Inc.,
Defendants,

Of which Resolute FP US, Inc. is the Appellant.

AND

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

v.

CBS Corporation; CNA Holdings, Inc.; Celanese Corporation; Cleaver-Brooks, Inc.; Covil Corporation; Daniel International Corporation; Fluor Daniel, Inc.; Fluor Daniel Services Corporation; Foster Wheeler Energy Corporation; General Electric Company; MP Supply, Inc.; Resolute FP US, Inc.; Union Carbide Corporation; United States Fidelity and Guaranty Company; Uniroyal, Inc.; United Conveyor Corporation,
Defendants,

Of which Resolute FP US, Inc. is the Appellant.

**RESPONDENTS' MOTION FOR PRO HAC VICE ADMISSION
OF RENEE MELANCON**

Pursuant to Rule 240 and Rule 404 of the *South Carolina Rules of Appellate Procedure* Renee Melancon, 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 neither has ever been the subject of a disciplinary proceeding.
2. This motion is based upon the attached Verified Application for Admission *Pro Hac Vice* of Renee Melancon, 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, as co-counsel in this matter.



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
Post Office Box 1476
Columbia, South Carolina 29202-476
803-256-4242
803-256-1952 (Facsimile)
Other email: emoultrie@kassellaw.com

ATTORNEYS FOR RESPONDENTS

February 5, 2019

Columbia, South Carolina.

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

James Calvin Sizemore	2018-000618	South Carolina Court of Appeals
Plaintiff	Case No.	Tribunal

vs.

Bowater Paper Mill, et al.	Office of Bar Admisisons
Defendant	Mailing Address of Tribunal:
	Supreme Court of South
	Carolina, P.O. Box 11330
	Columbia, SC 29211

Comes now RENEE MELANCON, applicant herein, and respectfully represents the following:

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S.C. SUPREME COURT

1. Applicant resides at:

3620 Banks Circle	Dallas	TX	75025
Street Address	County	State	Zip Code
Plano	Dallas	TX	75025
City	County	State	Zip Code
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 Shirley, LLP, with offices at 302 N, Market St., Ste. 300

Dallas	Dallas	TX	75202
Street Address	County	State	Zip Code
Dallas	Dallas	TX	75202
City	County	State	Zip Code
214-722-5990	214-435-9859	214-722-5991	rmelancon@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 James Calvin Sizemore 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 of 2003, 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 (24034573)	2003

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 Attorneys at Law law firm, which has offices at:

<u>1330 Laurel Street; P O Box 1476</u>			
<u>Street Address</u>	<u>Richland</u>	<u>SC</u>	<u>29202-1476</u>
<u>Columbia</u>	<u>County</u>	<u>State</u>	<u>Zip Code</u>
<u>803-256-4242</u>	<u>803-528-7070</u>	<u>803-256-1952</u>	<u>tmcvey@kassellaw.com</u>
<u>Primary Telephone</u>	<u>Cell Phone</u>	<u>Fax Number</u>	<u>Email Address</u>
<u>16682</u>			
<u>South Carolina Bar Number</u>			

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).

James Calvin Sizemore et al v. Bowater Paper Mill et al; Appellate Case No. 2018-000618

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 5th day of February, 20 19


APPLICANT

VERIFICATION

STATE OF TEXAS)

COUNTY OF DALLAS)

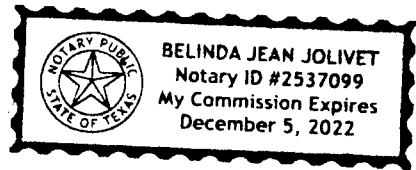
I, RENEE MELANCON, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and 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 4th day of February, 20 19

[Signature]

Notary Public for the State of TEXAS
My Commission Expires: 12/5/22



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 5 day of Feb, 20 19

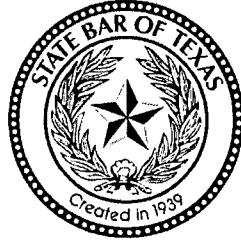
[Signature]
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

~~mail~~ ^{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 5th day of Feb, 20 19

[Signature]
APPLICANT/AFFIANT

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

November 15, 2018

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

To Whom It May Concern:

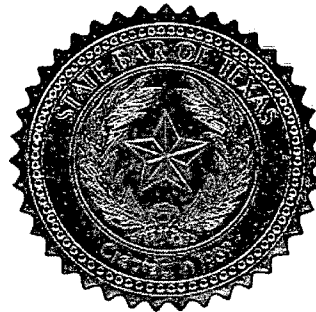
This is to certify that Ms. Renee Marie Melancon was licensed to practice law in Texas on May 03, 2002, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements;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

Linda A. Acevedo
Chief Disciplinary Counsel
LA/web



THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Defendants,

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PROOF OF SERVICE

I, Elizabeth C. Moultrie, of Kassel McVey Attorneys at Law, counsel for Respondents, do hereby certify that I have served a copy of Respondents' Motion for Pro Hac Vice Admission of Renee Melancon by depositing the same in the United States Mail, properly posted on February 5, 2019 addressed as follows to counsel of record:

Mark H. Wall (SC Bar #5798)
Morgan S. Templeton (SC Bar 15456)
Thomas B. Boger (SC Bar #81228)
145 King Street, Ste. 300
Charleston, South Carolina 29401


Elizabeth C. Moultrie

Columbia, South Carolina.