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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

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

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**Appellate Case No. 2018-001965**

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Jerry Howard Crawford, Individually and as Personal Representative of the Estate  
of Evelyn Kay Crawford, ..... Respondent,

v.

Celanese Corporation; Aurora Pump Company; Carrier Corporation; CNA  
Holdings LLC, f/k/a Celanese Corporation f/k/a Hoechst Celanese Corporation;  
Covil Corporation; Crane Co.; Daniel International Corporation f/k/a Daniel  
Construction Company, Inc.; Flowserve Corporation, individually and as  
successor-in-interest to Anchor/Darling Valve Company and individually and as  
successor-in-interest to Durco Pumps; Flowserve US Inc.; Fluor Constructors  
International, f/k/a Fluor Corporation; Fluor Constructors International, Inc.; Fluor  
Daniel Services Corporation; Fluor Enterprises, Inc.; Ford Motor Company;  
Genuine Parts Company, d/b/a Rayloc (a/k/a NAPA); The Goodyear Tire &  
Rubber Company; Goulds Pumps, Inc.; Grinnell, LLC, f/k/a Grinnell Corp, f/k/a  
ITT Grinnell Corp.; Honeywell International, Inc., f/k/a Allied-Products Liability  
Signal, Inc., sued as successor-in-interest to Bendix Corporation; Ingersoll-Rand  
Company; John Crane, Inc.; Metropolitan Life Insurance Company, a whollyowned  
subsidiary of Metlife Inc.; National Automotive Parts Association (NAPA);  
Parker-Hannifin Corporation; Pneumo Abex, LLC, successor in interest to Abex  
Corporation; Spirax Sarco, Inc.; SPX Cooling Technologies, Inc., individually and  
successor in interest to Marley Cooling Towers Co.; Standard Motor Products,  
Inc., sued as successor-in-interest to EIS Automotive; United States Fidelity &  
Guaranty Company; The William Powell Company, ..... Defendants,

Of Which Covil Corporation is the Appellant.

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**RESPONDENTS' MOTION FOR PRO HAC VICE ADMISSION  
OF KA'LEYA HARDIN**

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Pursuant to Rule 240 and Rule 404 of the *South Carolina Rules of Appellate Procedure* Ka'Leya Hardin, 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 Mississippi 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 Ka'Leya Hardin, 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 Ka'Leya Hardin, as co-counsel in this matter.



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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

February 5, 2019

Columbia, South Carolina.

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

<u>Jerry Howard Crawford, et al.</u>	<u>2017-CP-4204429</u>	In the Court of Common Pleas
Plaintiff	Case No.	7th Judicial Circuit
vs.	Mailing Address of Tribunal:	Tribunal
<u>Armstrong Intl., et al.</u>	<u>Spartanburg County Clerk of Court</u>	<u>P.O. Box 3483</u>
Defendant	<u>Spartanburg, SC 29304</u>	

Comes now KA'LEYA HARDIN, applicant herein, and respectfully represents the following:

1. Applicant resides at:

7332 Woodhome Drive

Street Address

<u>Dallas</u>	<u>Dallas</u>	<u>Texas</u>	<u>75249</u>
City	County	State	Zip Code
<u>214-722-5990</u>			

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 Street, Suite 300

Street Address

<u>Dallas</u>	<u>Dallas</u>	<u>TX</u>	<u>75202</u>
City	County	State	Zip Code
<u>214-722-5990</u>		<u>214-722-5991</u>	<u>khardin@dobslegal.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

Jerry Howard Crawford & Evelyn Kay Crawford 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 September of 2011, 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 Mississippi (Bar #103972) 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:
Mississippi State Courts	9/27/2011

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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, Attorneys at Law law firm, which has offices at:

1330 Laurel Street, P.O. Box 1476			
Street Address	Columbia	Richland	SC
City	803-256-4242	803-528-7070	29202
Primary Telephone	16682	803-256-1952	tmcvey@kassellaw.com
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).

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 5<sup>th</sup> day of February, 2019

*Kateya Handia*  
APPLICANT

**VERIFICATION**

STATE OF TEXAS

COUNTY OF DALLAS

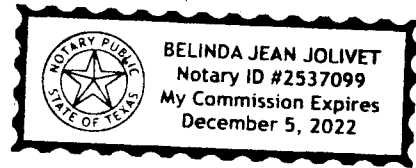
I, Ka'Leya Hardin, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and 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.

Ka'Leya Hardin  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 4<sup>th</sup> 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 6 day of February, 20 19, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

Ka'Leya Hardin  
APPLICANT/AFFIANT



THE MISSISSIPPI BAR

Post Office Box 2168  
Jackson, Mississippi 39225-2168  
Telephone (601) 948-4471  
Fax (601) 355-8635  
E-Mail [info@msbar.org](mailto:info@msbar.org)  
Website [www.msbar.org](http://www.msbar.org)

## *Letter of Good Standing*

TO WHOM IT MAY CONCERN:

As of the date below, the attorney named is a member in good standing of The Mississippi Bar on **Active** status.

**Ka'Leya Quinae Hardin**, Mississippi Bar Identification Number (103972) was admitted to practice law, **September 27, 2011**.

Amy S. Ward  
Membership Records Coordinator

Date 08/22/2018



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Construction Company, Inc.; Flowserve Corporation, individually and as  
successor-in-interest to Anchor/Darling Valve Company and individually and as  
successor-in-interest to Durco Pumps; Flowserve US Inc.; Fluor Constructors  
International, f/k/a Fluor Corporation; Fluor Constructors International, Inc.; Fluor  
Daniel Services Corporation; Fluor Enterprises, Inc.; Ford Motor Company;  
Genuine Parts Company, d/b/a Rayloc (a/k/a NAPA); The Goodyear Tire &  
Rubber Company; Goulds Pumps, Inc.; Grinnell, LLC, f/k/a Grinnell Corp, f/k/a  
ITT Grinnell Corp.; Honeywell International, Inc., f/k/a Allied-Products Liability  
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Of Which Covil Corporation is the Appellant.

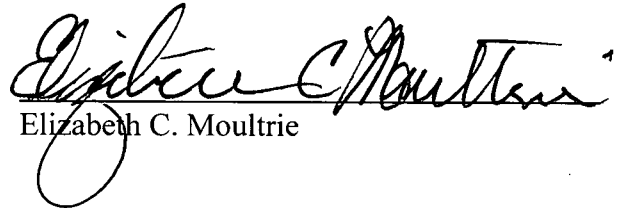
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**PROOF OF SERVICE**

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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 Ka'Leya Hardin 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.