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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable Jean H. Toal, Circuit Court Judge

APPELLATE CASE NO. 2018-001965 / CASE NO. 2017-CP-42-04429

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 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 wholly owned 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 as 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.

**CONSENT MOTION FOR SUBSTITUTION OF COUNSEL**

NOW COMES Covil Corporation, Appellant in the above-captioned matter, and shows the Court as follows:

The Appellant wishes to substitute counsel. Graham P. Powell of Wall Templeton & Haldrup, P.A. currently represents Appellant as Attorneys of Record. By agreement, the below signed attorney wishes to withdraw and Appellant wishes to substitute Ashley K. Brathwaite of

Ellis & Winters LLP as Attorney of Record for Covil Corporation.

WHEREFORE, PREMISES CONSIDERED, Appellant prays that the Court allow the Substitution of Counsel, as set forth herein.


This the 22 day of November, 2019.

*Christopher T. Er Trask, SC #102357  
for Ashley K. Brathwaite*

Ashley K. Brathwaite (S.C. Bar 76952)  
ELLIS & WINTERS LLP  
4131 Parklake Avenue, Suite 400  
Raleigh, NC 27612  
Telephone: (919) 573-1297  
[ashley.brathwaite@elliswinters.com](mailto:ashley.brathwaite@elliswinters.com)  
*Substituting Counsel for Covil  
Corporation*

WITH CONSENT:

WALL TEMPLETON & HALDRUP, P.A.

  
\_\_\_\_\_  
Graham P. Powell  
145 King Street, Suite 300 (29401)  
P.O. Box 1200  
Charleston, South Carolina 29402  
Telephone: (843) 329-9500  
[Graham.Powell@WallTempleton.com](mailto:Graham.Powell@WallTempleton.com)  
*Withdrawing Counsel for Covil Corporation*

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Of Which Covil Corporation is the Appellant.

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I certify this 22 day of November, 2019, that I have served a copy of the foregoing document upon other counsel of record, by depositing a copy thereof in the United States mail, postage prepaid, first class, addressed as follows:

Theile B. McVey  
John D. Kassel  
**Kassel McVey, Attorneys At Law**  
P.O. Box 1476  
Columbia, South Carolina 29202-1476

*Attorneys for Respondents Jerry Howard  
Crawford and Evelyn Kay Crawford*

Jonathan M. Holder  
Ka'Leya Harkin (admitted *pro hac vice*)  
**Dean Omar Branham Shirley, LLP**  
302 N. Market Street, Suite 300  
Dallas, Texas 75202

*Attorneys for Respondents Jerry Howard  
Crawford and Evelyn Kay Crawford  
Christopher T. G. Trask, SC # 102357  
for Ashley K. Brathwaite*

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Ashley K. Brathwaite (S.C. Bar 76952)  
ELLIS & WINTERS LLP



ELLIS & WINTERS

Writer's E-mail Address:  
Ashley.Brathwaite@elliswinters.com

Writer's Direct Phone:  
(919) 573-1297

November 22, 2019

**VIA U.S. MAIL**

V. Claire Allen, Deputy Clerk  
The South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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SC Court of Appeals

Re: *Jerry Howard Crawford v. Celanese Corporation*  
Appellate Case No.: 2018-001965

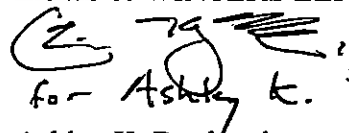
Dear Ms. Allen:

Please find enclosed Covil Corporation's Consent Order for Substitution of Counsel, Proposed Order, and filing fee.

Please file the enclosed original and return a filed-stamped copy to our office using the enclosed, self-addressed, postage paid envelope enclosed for your convenience. We appreciate your assistance with this matter, and if you have any questions, please do not hesitate to let me know.

Sincerely,

ELLIS & WINTERS LLP

 Bar Number 102387  
for Ashley K. Brathwaite

Ashley K. Brathwaite

Enclosures

cc (U.S. Mail): Thiele B. McVey  
Jonathan M. Holder  
John D. Kassel  
Ka'Leya Hardin  
Graham P. Powell

Hasler  
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**EW**  
ELLIS & WINTERS

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The South Carolina Court of Appeals  
1220 Senate Street  
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Ellis Winters LLP

