

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable Jean H. Toal, Circuit Court Judge

Case No. 2019-002126

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
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

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SC Court of Appeals

Company, and The William Powell Company, Defendants,
Of Which, Covil Corporation is the Appellant.

APPELLANT'S MOTION FOR PRO HAC VICE ADMISSION OF ERICA
PETERSON

NOW COMES Appellant, Covil Corporation ("Appellant") by and through its undersigned counsel, and respectfully moves the Court pursuant to Rule 240 and Rule 404, SCACR, for the *Pro Hac Vice* admission of Erica Peterson in order for Ms. Peterson to participate as counsel for Appellant, and in support thereof, states:

1. That Ms. Peterson is a member in good standing of the Virginia 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 Erica Peterson, a copy of which is attached hereto and incorporated herein by reference.

This the 3rd day of April, 2020.



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

Counsel for Covil Corporation

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

Jerry Howard Crawford	2019-002126	The South Carolina Court of Appeals
Plaintiff	Case No.	Tribunal
vs.		
Celanese Corporation, et al.	Mailing Address of Tribunal:	Calhoun Building
Defendant		1220 Senate Street
		Columbia, SC 29201

Comes now Erica N. Peterson, applicant herein, and respectfully represents the following:

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1. Applicant resides at:

925 N. Garfield St. Apt. 504	Arlington	SC
Street Address	City	State
Arlington	Arlington	22201
City	County	Zip Code
303-941-2179		
Telephone		

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Hunton Andrews Kurth LLP, with offices at 2200 Pennsylvania Avenue, NW

Washington	DC	20037
City	State	Zip Code
202.955.1932	202-258-7841	epeterson@hunton.com
Primary Telephone	Cell Phone	Email Address
	Fax Number	

3. Applicant has been retained personally or as a member of the above-named law firm by Covil Corporation 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 Jan. 7 of 2015, 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 Virginia 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:
See Attached	

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.)

United States District Court for the District of Columbia

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):

None

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):

None

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):

None

9. Local counsel of record associated with applicant in this case is Ashley Brathwaite of the Ellis & Winters LLP law firm, which has offices at:

4131 Parklake Avenue, Suite 400

Street Address

Raleigh

Wake

NC

27636

City

County

State

Zip Code

919-573-1297

919-865-7010

ashley.brathwaite@elliswinters.com

Primary Telephone

Cell Phone

Fax Number

Email Address

76952

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).

None

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 30th day of March, 2020

Elinor N. Ho

APPLICANT

VERIFICATION

STATE OF Virginia)

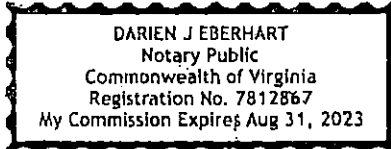
COUNTY OF Arlington)

I, Erica N. Peterson, 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.

Erica N. Peterson
APPLICANT/AFFIANT

Subscribed and sworn to before me this 30th day of March, 20 20

[Signature]
Notary Public for the State of Virginia
My Commission Expires: 8/31/2023



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 3rd day of April, 20 20

[Signature]
LOCAL COUNSEL OF RECORD

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SC Court of Appeals

CERTIFICATE OF SERVICE

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

3rd day of April, 20 20

[Signature]
APPLICANT/AFFIANT

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Douglas B. Robelen, Clerk of the Supreme Court of Virginia,
do hereby certify that

Erica Nicole Peterson

was admitted to practice as an attorney and counsellor at the bar of this Court on
January 7, 2015.

I further certify that so far as the records of this office are
concerned, Erica Nicole Peterson is a member of the bar of this Court in
good standing.

Witness my hand and seal of said Court

This 24th day of March

A.D. 2020

By: 

Deputy Clerk

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable Jean H. Toal, Circuit Court Judge

Case No. 2019-002126

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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/lc/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.,
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Of Which, Covil Corporation is the Appellant.

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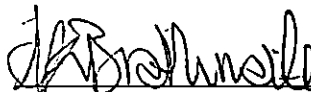
I, Ashley K. Brathwaite of Ellis & Winters LLP, do hereby certify that I have served Appellant's Motion For *Pro Hac Vice* Admission Of Erica Peterson via electronic mail and by depositing the same in the United States Mail, properly posted, on the 6th day of April, 2020, addressed as follows to counsel of record:

Theile B. McVey
John D. Kassel
KASSEL McVEY ATTORNEYS AT
LAW
1330 Laurel Street
Columbia, South Carolina 29202
tmcvey@kassellaw.com
jkassel@kassellaw.com

**Attorneys for Respondent Jerry
Howard Crawford, individually and as
Personal Representative of the Estate of
Evelyn Kay Crawford**

Jonathan M. Holder
Ka'Leya Hardin
DEAN OMAR BRANHAM SHIRLEY,
LLP
302 N. Market Street, Ste. 300
Dallas, Texas 75202
jholder@dobslegal.com
khardin@dobslegal.com

**Attorneys for Respondent Jerry
Howard Crawford, individually and as
Personal Representative of the Estate of
Evelyn Kay Crawford**



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

Counsel for Covil Corporation



Writer's E-mail Address:
ashley.brathwaite@elliswinters.com

Writer's Direct Phone:
919.573.1297

April 6, 2020

VIA OVERNIGHT DELIVERY

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

Re: *Crawford v. Covil Corporation*, 2018-001965; and
Crawford v. Covil Corporation, 2019-002126

Dear Your Honor:

Enclosed please find an original and one copy each of the following:

- (1) Appellant's Motion for *Pro Hac Vice* Admission of Elbert Lin in 2019-002126;
- (2) Appellant's Motion for *Pro Hac Vice* Admission of Erica Peterson in 2019-002126,
- (3) Two checks each in the amount of \$50 for the filing fees associated with each motion.

The original verified applications of Mr. Lin and Ms. Peterson along with good standing certificates have been forwarded to the South Carolina Office of Bar Admissions.

If these documents meet with your approval, please file the enclosed originals and return filed-stamped copies to our office using the enclosed, self-addressed, FedEx 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

Ashley K. Brathwaite

cc: Counsel of Record

ELLIS & WINTERS LLP

Mailing Address: P.O. Box 33550, Raleigh, NC 27636
4131 Parklake Avenue, Suite 400, Raleigh, NC 27612
T 919.865.7000 F 919.865.7010 W www.elliswinters.com

ORIGIN ID:RZZA (919) 865-7000
ASHLEY K. BRATHWAITE
ELLIS & WINTERS LLP
4131 PARKLAKE AVENUE
SUITE 400
RALEIGH, NC 27612
UNITED STATES US

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TO JENNY ABBOTT KITCHINGS, CLERK
SC COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

(803) 734-1890

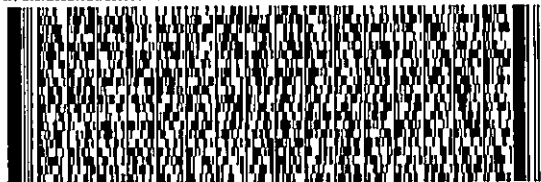
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