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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

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

Appellate Case No. 2019-001600
Case No. 2015-CP-04-01607

RECEIVED
MAY 29 2020
SC Court of Appeals

Rita Joyce Glenn, individually and as personal
representative of the Estate of
Tommy Harold Glenn, deceased, Respondents,

vs.

3M Company, f/k/a Minnesota Mining and Manufacturing Co.; Air & Liquid Systems Corporation, Individually and as Successor-In-Interest to Buffalo Pumps; Airgas USA, LLC; Aurora Pump; BW/IP Inc., a Subsidiary of Flowserve Corporation; 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, Inc.; Carboline Company; Crane Co. d/b/a Crane Chempharna & Energy d/b/a Aloyco, n/k/a Crane Energy Flow Solutions; Crosby Valve, Inc.; Dana Companies, LLC; Daniel International Corporation; Fisher Controls International, LLC.; Flowserve Corporation, Individually and as Successor in Interest to Anchor/Darling Valve Company; Flowserve Corporation, Individually and as Successor to Byron Jackson Pump Company; Fluor Daniel, Inc., f/k/a Daniel Construction Company, Inc.; Fluor Daniel Services Corporation; Foster Wheeler Energy Corporation; General Electric Company; Goodyear Tire & Rubber; Goulds Pumps, Inc.; Grinnell LLC, f/k/a Grinnell Corp, f/k/a ITT Grinnell Corp., Individually and as Successor to Kennedy Valve Manufacturing Co., Inc.; 1-Iajoca Corporation; Imo Industries, Inc., Individually and as Successor-in-Interest to De Laval Turbine, Inc.; Ingersoll Rand Company; ITT Corporation; John Crane, LLC; Linde LLC, a Delaware Limited Liability Company, formerly known as the BOC Group, Inc. and/or Airco, Inc.; MP Supply, Inc. f/k/a Mill Power Supply; Metropolitan Life Insurance Company, a wholly-owned subsidiary of MetLife, Inc.; Sepco Corporation; The J.R. Clarkson Company Solely as a Successor by Merger to Anderson Greenwood & Co., f/k/a Kunkle Valve Company, Inc.; The Sherwin-Williams Company; Trane U.S. Inc., f/k/a American Standard, Inc.; United Conveyor Corporation; United Seal & Rubber Company, Inc.; Uniroyal, Inc., f/k/a United States Rubber Company, Inc.; Velan Valve Corporation;

Viking Pump, Inc.; and Weir Valves & Controls USA, Inc., Individually and as Successor in interest to Atwood & Morrill Co., Inc. Defendants,

Of which Fisher Controls International LLC is the Appellant.

MOTION FOR PRO HAC VICE ADMISSION

Pursuant to Rule 404 of the *South Carolina Rules of Appellate Procedure*, Lisa White Shirley, 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 Plaintiffs, and in support thereof, states:

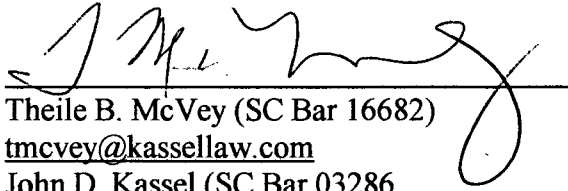
1. That Lisa White Shirley is a member in good standing of the Texas State Bar, admitted before the court of last resort in that state, and has never been the subject of a disciplinary proceeding.
2. This motion is based upon the attached Verified Application for Admission *Pro Hac Vice* of Lisa W. Shirley.
3. Respondents have consulted with Appellants to determine if there is any objection to this Motion and were informed that there is no objection.
4. A proposed *ex parte* Order is attached.

WHEREFORE, the undersigned counsel for Plaintiffs moves for the admission *Pro Hac Vice* of Lisa White Shirley, as co-counsel in this matter.

[Signature appears on the following page.]

Dated: May 22, 2020

Respectfully submitted,



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

803-256-4242

803-256-1952(Facsimile)

Other email: emoultrie@kassellaw.com

Lisa W. Shirley (*Pro Hac Vice* pending)

lshirley@dobslegal.com

Jonathan M. Holder (SC Bar 77935)

jholder@dobslegal.com

DEAN OMAR BRANHAM SHIRLEY, LLP

302 N. Market Street, Suite 300

Dallas, TX 75202

214-722-5990

214-722-5991 (Facsimile)

ATTORNEYS FOR RESPONDENTS

Columbia, South Carolina.

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

RECEIVED
MAR 16 2020
S.C. SUPREME COURT

Rita Joyce Glenn, Individually and
as Personal Representative of the
Estate of Thomas Harold Rit Glenn,
Deceased, Respondent,

2019-001600

South Carolina Court of Appeals
Tribunal

Plaintiff

Case No.

Tribunal

vs.

Mailing Address of Tribunal:

Post Office Box 11629

3M Company, et al.

Columbia, SC 29211

Defendant

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

1. Applicant resides at:

221 S. Edgefield Avenue

Street Address

Dallas

Dallas

TX

75208

City

County

State

Zip Code

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

Dallas

Dallas

TX

75202

City

County

State

Zip Code

214-722-5990

214-542-5596

214-722-5991

lshirley@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

Rita Glenn, Personal Rep of Estate of Thomas Glenn

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.)

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Court:	Date Admitted:
See attached.	

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 29202
 City County State Zip Code
803-256-4242 803-528-7070 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).

See attached.

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 March, 20 20

Shawn Shirley
APPLICANT

VERIFICATION

STATE OF Dallas)

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.

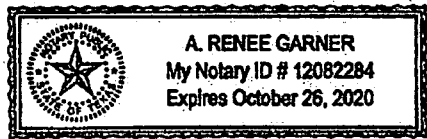
Lisa W. Shirley
APPLICANT/AFFIANT

Subscribed and sworn to before me this 5th day of March, 2020

A. Renee Garner

Notary Public for the State of Texas

My Commission Expires: 10/26/20



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 March, 2020

[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 16th day of March, 2020

Lisa W. Shirley
APPLICANT/AFFIANT

Attachment to Application for Admission Pro Hac Vice
in the State of South Carolina

No. 5:

Court of Admission	Year Admitted
Texas	4/20/2006
Florida	2001
Louisiana	1999
U.S. Supreme Court	10/02/2017
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. District Court of Texas – Northern	2018
U.S. Court of Appeals – 2 nd Circuit	2014
U.S. Court of Appeals – 4 th Circuit	01/29/2019
U.S. Court of Appeals – 5 th Circuit	2011
U.S. Court of Appeals – 6 th Circuit	2006
U.S. Court of Appeals – 7 th Circuit	2010
U.S. Court of Appeals – 9 th Circuit	7/2019
U.S. Court of Appeals – 11 th Circuit	2001

No. 10:

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

Howe et al. v. Air & Liquid Systems Corp., et al.; appeal: 10/01/18; Theile McVey of Kassel McVey; granted

Falls et al. v. CBS Corporation, et al.; appeal: 10/01/18; Theile McVey of Kassel McVey; granted

Sizemore et al. v. Bowater Paper Mill, et al.; appeal: 10/01/18; Theile McVey of Kassel McVey; granted

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Lisa White Shirley

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 20th day of April, 2006.

I further certify that the records of this office show that, as of this date

Lisa White Shirley

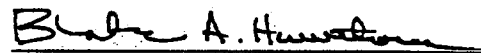
is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 5th day of March, 2020.

BLAKE HAWTHORNE, Clerk


Clerk, Supreme Court of Texas

No. 7147C.1

This certification expires thirty days from this date, unless sooner revoked or rendered invalid by operation of rule or law.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

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

Appellate Case No. 2016-001600
Case No. 2015-CP-04-01607

Rita Joyce Glenn, individually and as personal
representative of the Estate of
Tommy Harold Glenn, deceased,..... Respondents,

vs.

3M Company, f/k/a Minnesota Mining and Manufacturing Co.; Air & Liquid Systems Corporation, Individually and as Successor-In-Interest to Buffalo Pumps; Airgas USA, LLC; Aurora Pump; BW/IP Inc., a Subsidiary of Flowserve Corporation; 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, Inc.; Carboline Company; Crane Co. d/b/a Crane Chempharma & Energy d/b/a Aloyco, n/k/a Crane Energy Flow Solutions; Crosby Valve, Inc.; Dana Companies, LLC; Daniel International Corporation; Fisher Controls International, LLC.; Flowserve Corporation, Individually and as Successor in Interest to Anchor/Darling Valve Company; Flowserve Corporation; Individually and as Successor to Byron Jackson Pump Company; Fluor Daniel, Inc., f/k/a Daniel Construction Company, Inc.; Fluor Daniel Services Corporation; Foster Wheeler Energy Corporation; General Electric Company; Goodyear Tire & Rubber; Goulds Pumps, Inc.; Grinnell LLC, f/k/a Grinnell Corp, f/k/a ITT Grinnell Corp., Individually and as Successor to Kennedy Valve Manufacturing Co., Inc.; 1-Iajoca Corporation; Imo Industries, Inc., Individually and as Successor-in-Interest to De Laval Turbine, Inc.; Ingersoll Rand Company; ITT Corporation; John Crane, LLC; Linde LLC, a Delaware Limited Liability Company, formerly known as the BOC Group, Inc. and/or Airco, Inc.; MP Supply, Inc. f/k/a Mill Power Supply; Metropolitan Life Insurance Company, a wholly-owned subsidiary of MetLife, Inc.; Sepco Corporation; The J.R. Clarkson Company Solely as a Successor by Merger to Anderson Greenwood & Co., f/k/a Kunkle Valve Company, Inc.; The Sherwin-Williams Company; Trane U.S. Inc., f/k/a American Standard, Inc.; United Conveyor Corporation; United Seal & Rubber Company, Inc.; Uniroyal, Inc., f/k/a United States Rubber Company, Inc.; Velan Valve Corporation;

Viking Pump, Inc.; and Weir Valves & Controls USA, Inc., Individually and as Successor in interest to Atwood & Morrill Co., Inc.Defendants,

Of which Fisher Controls International LLC is the Appellant.

PROOF OF SERVICE

I, the undersigned Senior Paralegal of the law offices of Kassel McVey, Attorneys at Law, attorneys for Respondents, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleading: Motion *Pro Hac Vice* for Lisa White Shirley.

Counsel Served:

C. Mitchell Brown
A. Mattison Bogan
Nicholas A. Charles
Nelson Mullins Riley & Scarborough LLP
1320 Main Street/ 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

Attorneys for Fisher Controls International LLC


ELIZABETH CASON MOULTRIE

May 22, 2020

JOHN D. KASSEL
ATTORNEY AT LAW
JKASSEL@KASELLAW.COM

KASSEL  McVEY

1330 LAUREL STREET
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TEL. 803-256-4242
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WWW.KASELLAW.COM

JAMIE R. RUTKOSKI
ATTORNEY AT LAW
JRUTKOSKI@KASELLAW.COM

May 22, 2020

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SC Court of Appeals

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1015 Sumter Street
P O Box 11629
Columbia, SC 29211-1629

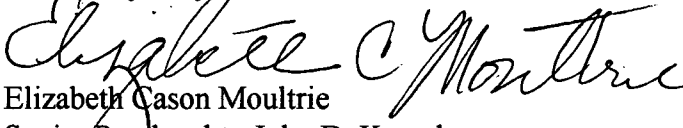
Re: *Glenn v. 3M, et al.; of whom Fisher Controls is the Appellant*
Appeal No.: 2019-001600

Dear Ms. Kitchings:

Enclosed herewith please find the original and two (2) copies of Respondents' Motion for Pro Hac Vice Admission of Lisa Shirley in connection with the above-referenced matter. I have also enclosed a proposed Order Granting Repondents' Motion for Pro Hac Vice Admission. Please file the original Motion and return a clocked copy to me in the envelope provided for your convenience. I have included a check in the amount of \$50.00 to cover the filing fee. By copy of this letter, I am serving counsel for Appellants with a copy of this motion.

Thank you for your kind consideration and attention. If you have any questions or concerns, please feel free to contact me via email, or on my cell phone at 803-312-5146.

Yours very truly,

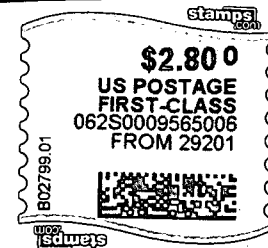

Elizabeth Cason Moultrie
Senior Paralegal to John D. Kassel,
Theile B. McVey, and Jamie Rae Rutkoski

ECM:bmh

Enclosures

cc: Lisa Shirley, Esquire (w/enclosures; via email only)

Kassel MSVey Attorneys
P. O. Box 1476
Columbia SC 29202-1476



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The Honorable Jenny A. Kitchenings
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