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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

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

**Appellate Case No. 2018-001965**

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 ofMetlife 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.

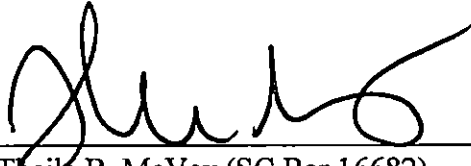
**RESPONDENTS' MOTION FOR PRO HAC VICE ADMISSION  
OF LISA SHIRLEY**

Pursuant to Rule 240 and Rule 404 of the *South Carolina Rules of Appellate Procedure* Lisa 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 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 Lisa Shirley, 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 Lisa Shirley, as co-counsel in this matter.



Theile B. McVey (SC Bar 16682)

[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)

John D. Kassel (SC Bar 03286)

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Other email: [emoultrie@kassellaw.com](mailto:emoultrie@kassellaw.com)

ATTORNEYS FOR RESPONDENTS

July 21, 2021

Columbia, South Carolina.

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG 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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Appellate Case No. 2018-001965  
Case No. 2017-CP-42-04429

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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 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 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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ORDER

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Theile B. McVey and John D. Kassel, of the firm Kassel McVey Attorneys at Law, move this Court for an order admitting Lisa White Shirley, Esquire, *pro hac vice* in this case as co-counsel for the Respondent. The motion is Granted.

FOR THE COURT

BY: \_\_\_\_\_  
CLERK

Columbia, South Carolina

cc:

Theile Branham McVey, Esquire  
Jonathan Marshall Holder, Esquire  
Ashley K. Brathwaite, Esquire  
John D. Kassel, Esquire  
Graham Pollock Powell, Esquire  
Lisa W. Shirley, Esquire  
Ka'Leya Hardin, Esquire

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Jean Hoefer 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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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  
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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  
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Guaranty Company; The William Powell Company, ..... Defendants,

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 Lisa Shirley by depositing the same in the United States Mail, properly posted on July 29, 2021 addressed as follows to counsel of record:

Ashley K. Brathwaite  
Ellis & Winters LLP  
4131 Parklake Avenue, Suite 400  
Raleigh, NC 27612

  
Elizabeth C. Moultrie

Columbia, South Carolina.

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

KASSEL  McVEY

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

July 29, 2021

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

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**SC Court of Appeals**

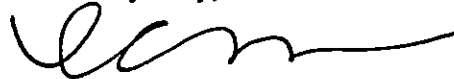
Re: Jerry Howard Crawford, etc., et al. v. Celanese Corporation, et al.; of  
whom Covil Corporation is the Appellant.  
Appellate Case No.: 2018-001965  
*Jerry Howard Crawford, etc., et al. v. Celanese Corporation, et al.;*  
*of whom Covil Corporation is the Appellant*  
Appellate Case No.: 2019-002126

Dear Ms. Kitchings:

Enclosed herewith please find the original and one (1) copy of Respondents' Motion for PHV Admission of Lisa Shirley in each of the above-referenced cases, along with our Proposed Order and our Proof of Service of same. Please file the originals and return a clocked copy of each in the envelope provided for your convenience.

Thank you for your consideration of this request. By copy of this letter, I am serving a copy of the enclosed on counsel of the appellant.

Yours very truly,

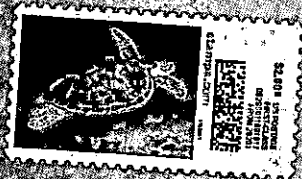


Elizabeth C. Moultrie  
Senior Paralegal to John D. Kassel,  
Theile B. McVey and Jamie Rae Rutkoski

TBM:ecm

Enclosures

cc: Ashley M. Braithwaite, Esquire (w/enclosures)  
ACOR as appropriate



KASSEL MCVEY ATTORNEYS AT LAW  
Post Office Box 1476  
Columbia, South Carolina 29202-1476

**TO:** The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
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