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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

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

Appellate Case No. 2019-002126
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 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.

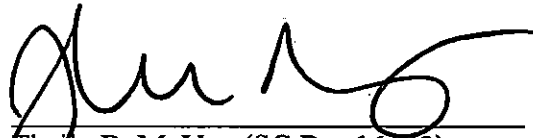
**RESPONDENT'S MOTION FOR
PRO HAC VICE ADMISSION OF
LISA WHITE SHIRLEY**

Pursuant to RULE 240 AND 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 Respondent, 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 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 White Shirley, a copy of each of which is attached hereto and incorporated herein by reference.

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



Thelie B. McVey (SC Bar 16682)

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John D. Kassel (SC Bar 03286)

jkassel@kassellaw.com

KASSEL MCVEY

ATTORNEYS AT LAW

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July 11 2021

Columbia, South Carolina

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Court of Common Pleas

Jean Hoefler Toal, Chief Justice of the Supreme Court of South Carolina (Retired)
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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.

ORDER

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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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
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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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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.

PROOF OF SERVICE

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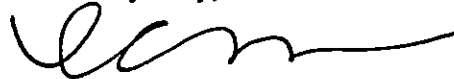
Re: Jerry Howard Crawford, etc., et al. v. Celanese Corporation, et al.; of
whom Covil Corporation is the Appellant.
Appellate Case No.: 2018-001965
Jerry Howard Crawford, etc., et al. v. Celanese Corporation, et al.;
of whom Covil Corporation is the Appellant
Appellate Case No.: 2019-002126

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,

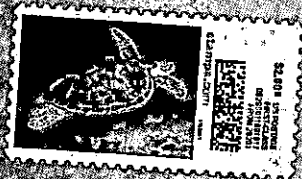


Elizabeth C. Moultrie
Senior Paralegal to John D. Kassel,
Theile B. McVey and Jamie Rae Rutkoski

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
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