

Case No. SC21-175
L.T. Case No. 5D19-2549

IN THE SUPREME COURT OF FLORIDA

BRINDA COATES, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF LOIS STUCKY,

Plaintiff/Petitioner,

v.

R.J. REYNOLDS TOBACCO CO.,

Defendant/Respondent.

**VERIFIED MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE*
PURSUANT TO FLORIDA RULE OF GENERAL PRACTICE AND
JUDICIAL ADMINISTRATION 2.510**

Thomas H. Dupree, Jr., movant herein, respectfully represents the following:

1. Movant resides in Chevy Chase, Maryland. Movant is not a resident of the State of Florida.

2. Movant is an attorney and a member of the law firm of Gibson, Dunn & Crutcher LLP, with offices located at 1050 Connecticut Avenue, N.W., Washington, D.C. 20036, telephone (202) 955-8547, email tdupree@gibsondunn.com.

3. Movant has been retained as a member of the above-named law firm on November 5, 2021, by PLAC

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(Product Liability Advisory Council) to provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida.

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions (Bar number in parentheses where applicable):

District of Columbia (467195)

U.S. Supreme Court

U.S. Court of Appeals for the First Circuit

U.S. Court of Appeals for the Second Circuit

U.S. Court of Appeals for the Third Circuit

U.S. Court of Appeals for the Fourth Circuit

U.S. Court of Appeals for the Fifth Circuit

U.S. Court of Appeals for the Sixth Circuit

U.S. Court of Appeals for the Seventh Circuit

U.S. Court of Appeals for the Eighth Circuit

U.S. Court of Appeals for the Ninth Circuit

U.S. Court of Appeals for the Tenth Circuit

U.S. Court of Appeals for the Eleventh Circuit

U.S. Court of Appeals for the District of Columbia Circuit

U.S. Court of Appeals for the Federal Circuit

U.S. District Court for the District of Columbia (467195)

U.S. District Court for the Eastern District of Wisconsin

U.S. District Court for the Eastern District of Michigan

U.S. District Court for the Northern District of Illinois

U.S. Tax Court (DT0290)

5. A judicial officer or the entity responsible for attorney regulation has neither initiated disciplinary, suspension, disbarment or contempt proceedings or disciplined, suspended, disbarred or held Movant in contempt in the preceding 5 years.

6. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

7. Movant is not an inactive member of The Florida Bar.

8. Movant is not now a member of The Florida Bar.

9. Movant is not a suspended member of The Florida Bar.

10. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation or disciplinary revocation from The Florida Bar.

11. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of General Practice and Judicial Administration 2.510.

12. Movant has not filed motions to appear as counsel in any Florida state court during the past five years.

13. Local counsel of record associated with Movant in this matter is Wendy F. Lumish, Florida Bar No. 334332, who is an active member in good standing of The Florida Bar, and has offices at Two Alhambra Plaza, Suite 800, Coral Gables, Florida 33134, (305) 995-6099.

14. Movant has read the applicable provisions of Florida Rule of General Practice and Judicial Administration 2.510 and Rule 3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

15. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

16. Movant respectfully requests permission to appear in this Court for this cause only.

Dated this 5th day of January, 2022.

Respectfully submitted,

/s/Thomas H. Dupree, Jr.
Thomas H. Dupree, Jr.
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue,
N.W. Washington, D.C. 20036
(202) 955-8547
tdupree@gibsondunn.com

STATE OF WASHINGTON

DISTRICT OF COLUMBIA

I, Thomas H. Dupree, Jr., do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof; and the contents are true of my knowledge and belief.

/s/ Thomas H. Dupree, Jr.
Movant

I consent to be associated as local counsel of record in this cause pursuant to Florida Rule of General Practice and Judicial Administration 2.510.

DATED this 5th day of January, 2022.

Respectfully submitted,

BOWMAN AND BROOKE LLP
Two Alhambra Plaza, Suite 800
Coral Gables, Florida 33134
Telephone: (305) 995-6099

/s/ Wendy F. Lumish

WENDY F. LUMISH

Florida Bar No. 334332

wendy.lumish@bowmanandbrooke.com

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing motion was electronically filed with the Clerk of Court through the Florida Courts eFiling Portal, served via e-mail and electronically filed with PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333 accompanied by payment of the \$250.00 filing fee on this 5th day of January, 2022 to:

William H. Ogle, Esq.
Parama K. Liberman, Esq.
OGLE LAW FIRM
444 Seabreeze Blvd., Suite 800
Daytona Beach, FL 32118
PH: 386-253-2500
oglelaw@gmail.com
PKLiberman@gmail.com
miranda@oglelawfirm.com
meri@oglelawfirm.com
Attorneys for Petitioner

John S. Mills
Bishop & Mills, PLLC
1 Independent Drive, Suite 1700
Jacksonville, FL 32202
PH: 904-598-0034
jmills@bishopmills.com
service@bishopmills.com
jmills@mills-appeals.com
Attorneys for Petitioner

Andrew B. Greenlee, Esq.
ANDREW B. GREENLEE, P.A.
401 East 1st Street, Unit 261
Sanford, FL 32772
PH: 407-808-6411
andrew@andrewgreenleelaw.com
andrewbgreenlee@gmail.com
Attorneys for Petitioner

Joshua R. Gale, Esq.
WIGGINS CHILDS PANTAZIS
FISHER & GOLDFARB LLC
101 North Woodland Blvd.,
Suite 600
Deland, FL 32720
PH: 386-675-6946
jgale@wigginschilds.com
ttodd@wigginschilds.com
Attorneys for Petitioner

Courtney Brewer
Jonathan A. Martin
Bailey Howard
Bishop & Mills, PLLC
325 North Calhoun Street
Tallahassee, Florida 32301
PH: 850-765-0897
cbrewer@bishopmills.com
jmartin@bishopmills.com
bhoward@bishopmills.com
service@bishopmills.com
Attorneys for Petitioner

Charles R.A. Morse
JONES DAY
250 Vesey St.
New York, NY 10281-1047
PH: (212) 326-3939
cramorse@jonesday.com
Attorneys for Respondent

Jason T. Burnette
Brian Charles Lea
JONES DAY
1221 Peachtree Street, NE
Suite 8400
Atlanta, GA 30361
PH: (404) 521-3939
blea@jonesday.com
Attorneys for Respondent

Kansas R. Gooden, Esq.
Boyd & Jenerette, P.A.
11767 S. Dixie Hwy., #274
Miami, FL 33156
PH: 305-537-1238
kgooden@boydjen.com
Amicus Curiae for Committee of the
FDLA on behalf of Respondent

Troy A. Fuhrman
Marie A. Borland
HILL WARD HENDERSON
101 E. Kennedy Blvd., Suite 3700
Post Office Box 2231
Tampa, Florida 33601
PH: (813) 221-3900
troy.fuhrman@hwlaw.com
marie.borland@hwlaw.com
reynolds@hwlaw.com
Attorneys for Respondent

Samuel F. Callahan, Esq.
John P. Elwood, Esq.
ARNOLD & PORTER Kaye
Scholer LLP
601 Massachusetts Ave., NW
Washington, DC 20001-3743
PH: 202-942-5000
sam.callahan@arnoldporter.com
john.elwood@arnoldporter.com
Amicus Curiae for Philip Morris
USA Inc.

/s/ Wendy F. Lumish
WENDY F. LUMISH