

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

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**IN THE SUPREME COURT OF FLORIDA**

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

*Plaintiff/Petitioner,*

v.

R.J. REYNOLDS TOBACCO CO.,

*Defendant/Respondent.*

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**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](mailto: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