

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY COURT OF COMMON PLEAS
The Honorable Jean Hoefler Toal, Acting Circuit Court Judge

Case No. 2020-CP-40-04385

Southern Insulation, Inc., through its Receiver, Peter D. Protopapas,.....Respondent,

vs.

OneBeacon Insurance Group, Ltd. (f/k/a White Mountains Insurance Group, Ltd., f/k/a CGU Insurance Company, f/k/a Commercial Union Corporation, f/k/a General Accident Insurance Company of America); OneBeacon Insurance Group LLC (n/k/a Intact Insurance Group USA LLC); R.V. Chandler & Associates, Inc.; Chandler Rental Properties, Inc.; Thomas S. Chandler; Jean B. Ownbey, as Trustee of the Thomas S. Chandler, Sr. Living Trust u/d 4/06/06; Gene N. Norville; the South Carolina Property and Casualty Insurance Guaranty Association; Trebuchet US Holdings, Inc.; Trebuchet Investments Limited; Trebuchet Group Holdings Limited (f/k/a Armour Group Holdings Limited); Brad S. Huntington, individually; and John C. Williams, individually,

Of whom OneBeacon Insurance Group, Ltd. (f/k/a White Mountains Insurance Group, Ltd., f/k/a CGU Insurance Company, f/k/a Commercial Union Corporation, f/k/a General Accident Insurance Company of America) and OneBeacon Insurance Group LLC (n/k/a Intact Insurance Group USA LLC) are Appellants.

NOTICE OF APPEAL

Intact Insurance Group USA Holdings Inc. (incorrectly sued as OneBeacon Insurance Group, Ltd. (f/k/a White Mountains Insurance Group, Ltd., f/k/a CGU Insurance Company, f/k/a Commercial Union Corporation, f/k/a General Accident Insurance Company of America)) and Intact Insurance Group USA LLC (incorrectly sued as OneBeacon Insurance Group LLC) (“Appellants”), by and through their undersigned counsel, appeal the Order of the Honorable Jean Hoefler Toal dated and filed on February 7, 2023 (“Order”). Appellants received written notice of the entry of the Order on February 7, 2023. A copy of the Order is attached hereto.

CALLISON TIGHE & ROBINSON, LLC

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February 21, 2023

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EXHIBIT A

RECEIVED

Feb 21 2023

SC Court of Appeals

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In the Court of Appeals

APPEAL FROM RICHLAND COUNTY COURT OF COMMON PLEAS
The Honorable Jean Hoefler Toal, Acting Circuit Court Judge

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vs.

OneBeacon Insurance Group, Ltd. (f/k/a White Mountains Insurance Group, Ltd., f/k/a CGU Insurance Company, f/k/a Commercial Union Corporation, f/k/a General Accident Insurance Company of America); OneBeacon Insurance Group LLC (n/k/a Intact Insurance Group USA LLC); R.V. Chandler & Associates, Inc.; Chandler Rental Properties, Inc.; Thomas S. Chandler; Jean B. Ownbey, as Trustee of the Thomas S. Chandler, Sr. Living Trust u/d 4/06/06; Gene N. Norville; the South Carolina Property and Casualty Insurance Guaranty Association; Trebuchet US Holdings, Inc.; Trebuchet Investments Limited; Trebuchet Group Holdings Limited (f/k/a Armour Group Holdings Limited); Brad S. Huntington, individually; and John C. Williams, individually,

Of whom OneBeacon Insurance Group, Ltd. (f/k/a White Mountains Insurance Group, Ltd., f/k/a CGU Insurance Company, f/k/a Commercial Union Corporation, f/k/a General Accident Insurance Company of America) and OneBeacon Insurance Group LLC (n/k/a Intact Insurance Group USA LLC) are Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that, on this date, a copy of Appellants' Notice of Appeal has been served upon counsel listed below via email, as follows:

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February 21, 2023

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RECEIVED

Feb 21 2023

SC Court of Appeals

February 21, 2023

VIA EMAIL: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings

Clerk of Court

S. C. Court of Appeals

1220 Senate Street

Columbia, SC 29201

RE: Southern Insulation, Inc., through its Receiver, Peter D. Protopapas
vs. OneBeacon Insurance Group, Ltd., *et al.*
Case No. 2020-CP-40-04385

Dear Ms. Kitchings:

Enclosed herewith please find a Notice of Appeal, together with Proof of Service, on behalf of Intact Insurance Group USA Holdings Inc. (incorrectly sued as OneBeacon Insurance Group, Ltd. (f/k/a White Mountains Insurance Group, Ltd., f/k/a CGU Insurance Company, f/k/a Commercial Union Corporation, f/k/a General Accident Insurance Company of America) and Intact Insurance Group USA LLC (incorrectly sued as OneBeacon Insurance Group LLC), in the above-referenced matter.

Kindly file the same and return a clocked-in copy to the undersigned via email.

This firm's check in the amount of \$250 in payment of the required filing fee will be hand delivered to your office.

Please do not hesitate to contact me with any questions.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

s/ Demetri “Jim” K. Koutrakos

Demetri “Jim” K. Koutrakos

DKK:ksr

Enclosures

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The Honorable Jenny Abbott Kitchings

February 21, 2023

Page 2

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