

RECEIVED

Aug 04 2023

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jean Hoefler Toal, Chief Justice (Ret.) and Acting Circuit Court Judge  
Case No. 2020-CP-40-04385

Court of Appeals Appellate Case No. 2023-00252

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, Defendants

Of which 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); 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, are the ..... Appellants.

**PROOF OF SERVICE**

The undersigned hereby certifies that, on this date, a copy of **Appellants' Joint Petition for Writ of Certiorari** has been served upon Respondent's counsel listed below via email, as follows:

Matthew T. Richardson, Esquire  
Eric B. Amstutz, Esquire  
Jessica L. Monsell, Esquire  
Wyche, PA  
807 Gervais Street, Suite #301  
Columbia, SC 29201  
Email: [mrichardson@wyche.com](mailto:mrichardson@wyche.com)  
Email: [eamstutz@wyche.com](mailto:eamstutz@wyche.com)  
Email: [jmonsell@wyche.com](mailto:jmonsell@wyche.com)

Brian M. Barnwell, Esquire  
Rikard & Protopapas, LLC  
2110 N. Beltline Blvd.  
Columbia, SC 29204  
Email: [bb@rplegalgroup.com](mailto:bb@rplegalgroup.com)

John B. White, Jr., Esquire  
Marghretta H. Shisko, Esquire  
Harrison White, PC  
178 W. Main Street  
Spartanburg, SC 29306  
Email: [jwhite@spartanlaw.com](mailto:jwhite@spartanlaw.com)  
Email: [mshisko@spartanlaw.com](mailto:mshisko@spartanlaw.com)

G. Murrell Smith, Jr., Esquire  
Jonathan M. Robinson, Esquire  
Shanon N. Peake, Esquire  
Smith Robinson Holler DuBose Morgan, LLC  
2530 Devine Street  
Columbia, SC 29205  
Email : [murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com)  
Email : [jon@smithrobinsonlaw.com](mailto:jon@smithrobinsonlaw.com)  
Email : [shanonp@smithrobinsonlaw.com](mailto:shanonp@smithrobinsonlaw.com)

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

**CALLISON TIGHE & ROBINSON, LLC**

s/ Demetri K. Koutrakos  
Demetri K. Koutrakos, SC Bar No. 11318  
Harry A. Dixon, SC Bar No. 103509  
1812 Lincoln Street, Suite #200 (29201)  
P. O. Box 1390  
Columbia, SC 29202-1390  
Telephone: 803-404-6900  
Email: [jimkoutrakos@callisontighe.com](mailto:jimkoutrakos@callisontighe.com)  
Email: [harrydixon@callisontighe.com](mailto:harrydixon@callisontighe.com)

**SAUL EWING LLP**

Paul M. Hummer (admitted *pro hac vice*)

Sean T. O'Neill (admitted *pro hac vice*)

Saul Ewing LLP

Centre Square West

1500 Market Street, 38th Floor

Philadelphia, PA 19102-2186

Telephone: 215-972-7777

Email: [paul.hummer@saul.com](mailto:paul.hummer@saul.com)

Email: [sean.oneill@saul.com](mailto:sean.oneill@saul.com)

John A. Basinger (admitted *pro hac vice*)

1270 Avenue of the Americas

New York, NY 10020

Telephone: 212-980-7200

Email: [john.basinger@saul.com](mailto:john.basinger@saul.com)

**MINTZ, LEVIN, COHN, FERRIS, GLOVSKY  
and POPEO, P.C.**

Deirdre G. Johnson (admitted *pro hac vice*)

555 12<sup>th</sup> Street NW

Suite 1100

Washington, DC 20004

Email: [djohnson@mintz.com](mailto:djohnson@mintz.com)

**Attorneys for Appellants Intact Insurance Group  
USA Holdings Inc. and Intact Insurance Group  
USA LLC**

-and-

**HAYNSWORTH SINKLER BOYD, P.A.**

*s/ Robert Y. Knowlton*

Robert Y. Knowlton, S.C. Bar No. 3589

Elizabeth H. Black, S.C. Bar No. 76067

1201 Main Street, 22nd Floor (29201)

Post Office Box 11889

Columbia, SC 29211-1889

Telephone: 803-779-3080

Email: [bknowlton@hsblawfirm.com](mailto:bknowlton@hsblawfirm.com)

Email: [eblack@hsblawfirm.com](mailto:eblack@hsblawfirm.com)

-and-

**STRADLEY RONON STEVENS & YOUNG, LLP**

Jeffrey D. Grossman, PA ID No. 78337

Application for admission pro hac vice submitted

2005 Market Street, Suite 2600

Philadelphia, PA 19103

Telephone: 215-564-8061

Email: [jgrossman@stradley.com](mailto:jgrossman@stradley.com)

**Attorneys for Appellants Trebuchet Investments Limited; Trebuchet Group Holdings Limited (f/k/a Armour Group Holdings Limited); Trebuchet US Holdings, Inc.; Brad S. Huntington, individually; and John C. Williams, individually**

August 4, 2023