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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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

Appellate Case No. 2023-000252

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 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, individually, are the.....Appellants.

Appellants Intact Insurance Group USA Holdings Inc. and  
Intact Insurance Group USA LLC's  
Motion to Relieve Counsel as to Paul M. Hummer

This Motion of the Appellants, Intact Insurance Group USA Holdings Inc. and Intact Insurance Group USA LLC<sup>1</sup>, seeks an Order from this Court relieving Paul M. Hummer as counsel for the Appellants identified above.

1. Paul M. Hummer will no longer be involved with this matter but others within his firm, already appearing in this matter, John A. Basinger and Sean T. O’Neill, will continue to be involved.

2. Appellants will continue to be represented by Saul Ewing LLP, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC and Callison Tighe & Robinson, LLC, and attorneys of record, John A. Basinger, Sean T. O’Neill, Deirdre G. Johnson, Demetri K. Koutrakos, and Harry A. Dixon, will remain as counsel for Appellants.

3. Relieving Mr. Hummer as counsel of record in this matter will not unreasonably delay the case or prejudice the parties in any manner.

WHEREFORE, Appellants respectfully request that the Court enter an order relieving Paul M. Hummer as counsel for the Appellants, Intact Insurance Group USA Holdings Inc. and Intact Insurance Group USA LLC, in this matter.

[SIGNATURE PAGE TO FOLLOW]

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<sup>1</sup> “Intact” refers collectively to Defendants/Appellants Intact Insurance Group USA Holdings Inc. (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 (sued as OneBeacon Insurance Group LLC).

Respectfully submitted,

**CALLISON TIGHE & ROBINSON, LLC**

s/ Demetri K. Koutrakos

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

I SO CONSENT:

/s/ Paul M. Hummer

Paul M. Hummer

October 20, 2023

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THE STATE OF SOUTH CAROLINA  
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APPEAL FROM RICHLAND COUNTY  
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Jean Hoefer Toal, Chief Justice (Ret.) and Acting Circuit Court Judge  
Case No. 2020-CP-40-04385

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 Intact Insurance Group USA Holdings Inc. and Intact Insurance Group USA LLC’s Motion to Relieve Counsel as to Paul M. Hummer** has been served upon counsel listed below via email, as follows:

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

**CALLISON TIGHE & ROBINSON, LLC**

*s/ Demetri K. Koutrakos*

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**Attorneys for Appellants Intact Insurance Group  
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October 20, 2023

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**SC Court of Appeals**

**VIA EMAIL:** [ctappfilings@sccourts.org](mailto: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.*  
Court of Appeals Appellate Case No. 2023-000252

Dear Mrs. Kitchings:

Enclosed herewith please find Appellants’ Motion to Relieve Counsel as to Paul M. Hummer, together with the Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy to the undersigned via return email. My firm’s check in the amount of \$50.00 as the filing fee is being mailed to your office under separate cover as instructed.

The enclosed documents have been served upon all counsel today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

*s/ Demetri “Jim” K. Koutrakos*

Demetri “Jim” K. Koutrakos

DKK:kam

Enclosures

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**cc (w/enc.) (via email):**

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