

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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S.C. SUPREME COURT

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

Court of Appeals Appellate Case No. 2023-000252

Supreme Court Case No. 2023-001243

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 theAppellants.

**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 LLC¹, 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 and Callison Tighe & Robinson, LLC, and attorneys of record, John A. Basinger, Sean T. O’Neill, 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]

¹ “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 24, 2023