

RECEIVED

Dec 21 2023

SC Court of Appeals

Exhibit A

Keith Rahman

Account Manager

Direct Claims Division

Phone: 312-345-2093

Fax: 312-750-1706

Email: krahman@resolutemgmt.com

Resolute Management Inc.

141 West Jackson Boulevard

Chicago Board of Trade Annex

Suite 1800A

Chicago, IL 60604

July 24, 2023

VIA EMAIL (pdp@rplegalgroup.com)

Peter Protopapas

Rikard & Protopapas, LLC

2110 N. Beltline Blvd.

Columbia, SC 29204

RECEIVED

Dec 21 2023

SC Court of Appeals

Re: Atlas Turner Inc. f/k/a Atlas Asbestos Company (“Atlas”)

Dear Mr. Protopapas,

Resolute Management Inc. is the administrator on behalf of certain CNA-affiliated underwriting entities (“CNA”) for certain asbestos claims that may impact CNA policies incepting prior to January 1, 2010. CNA received the email from Lindsay Valek, paralegal at Rikard & Protopapas, LLC, dated June 21, 2023 and responds to same herein.

As to the asbestos lawsuits filed against Atlas and listed in the June 21 communication (“Asbestos Lawsuits”),¹ CNA has been advised by Atlas that Atlas is controlling and defending its own interests in the Asbestos Lawsuits, and that you are not objecting to Atlas’s control of its own defense. Atlas is not tendering the Asbestos Lawsuits to CNA for defense and indemnity. See enclosed communication to Atlas dated July 21, 2023. Given that Atlas is not tendering the Asbestos Lawsuits, there is no defense or indemnity being requested from CNA.

If you have any questions concerning this correspondence, please feel free to contact me at krahman@resolutemgmt.com or 312-345-2093.

Best,



Keith P. Rahman

¹ The lawsuits filed against Atlas are: (1) *Lenora Childers, Individually and as Personal Representative of the Estate of Lewis C. Childers v. 3M Company* (Case No. 2021-CP-40-03484); (2) *Ricky Dean Flynn, as the Executor of the Estate of Jerry Kay Flynn, Deceased v. 3M Company* (Case No. 2023-CP-40-00633); (3) *Sandra M. Gonce, Individually and as Executrix of the Estate of Dwight Gonce, Deceased v. Air & Liquid Systems Corporation* (Case No. 2023-CP-40-02933); (4) *Joe Eldra Goodwin, Individually, and as the Personal Representative of the Estate of Dorothy Jean Fox Goodwin v. Air & Liquid Systems Corporation* (Case No. 2020-CP-40-04613); (5) *Heather Donaghy, as Personal Representative of the Estate of Shirley Smiley Potter, deceased v. 4520 Corp., Inc.* (Case No. 2023-CP-40-03108); (6) *John A. Tibbs and Margaret B. Tibbs v. 3M Company* (2023-CP-40-01759); and (7) *Melvin G. Welch and Donna B. Welch v. 3M Company* (Case No. 2022-CP-40-03834).

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July 24, 2023

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Peter Protopapas

Rikard & Protopapas, LLC

2110 N. Beltline Blvd.

Columbia, SC 29204

Re: Atlas Turner Inc. f/k/a Atlas Asbestos Company (“Atlas”)

Dear Mr. Protopapas,

Resolute Management Inc. is a third party-administrator for certain claims on behalf of Certain Underwriters at Lloyd’s, London (“Lloyd’s Underwriters”). Lloyd’s Underwriters received the email from Lindsay Valek, paralegal at Rikard & Protopapas, LLC, dated June 21, 2023 and responds to same herein.

As to the asbestos lawsuits filed against Atlas and listed in the June 21 communication (“Asbestos Lawsuits”),¹ Lloyd’s Underwriters have been advised by Atlas that Atlas is controlling and defending its own interests in the Asbestos Lawsuits, and that you are not objecting to Atlas’s control of its own defense. Atlas is not tendering the Asbestos Lawsuits to Lloyd’s Underwriters for defense and indemnity. See enclosed communication to Atlas dated July 21, 2023. Given that Atlas is not tendering the Asbestos Lawsuits, there is no defense or indemnity being requested from Lloyd’s Underwriters.

If you have any questions concerning this correspondence, please feel free to contact me at krahman@resolutemgmt.com or 312-345-2093.

Best,



Keith P. Rahman

¹ The lawsuits filed against Atlas are: (1) *Lenora Childers, Individually and as Personal Representative of the Estate of Lewis C. Childers v. 3M Company* (Case No. 2021-CP-40-03484); (2) *Ricky Dean Flynn, as the Executor of the Estate of Jerry Kay Flynn, Deceased v. 3M Company* (Case No. 2023-CP-40-00633); (3) *Sandra M. Gonce, Individually and as Executrix of the Estate of Dwight Gonce, Deceased v. Air & Liquid Systems Corporation* (Case No. 2023-CP-40-02933); (4) *Joe Eldra Goodwin, Individually, and as the Personal Representative of the Estate of Dorothy Jean Fox Goodwin v. Air & Liquid Systems Corporation* (Case No. 2020-CP-40-04613); (5) *Heather Donaghy, as Personal Representative of the Estate of Shirley Smiley Potter, deceased v. 4520 Corp., Inc.* (Case No. 2023-CP-40-03108); (6) *John A. Tibbs and Margaret B. Tibbs v. 3M Company* (2023-CP-40-01759); and (7) *Melvin G. Welch and Donna B. Welch v. 3M Company* (Case No. 2022-CP-40-03834).