

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Nov 06 2023**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Jean Hofer Toal, Chief Justice (Ret.)

**SC Court of Appeals**

Case No. 2022-CP-40-03834

Appellate Case No. 2023-001096

Donna B. Welch, individually and as Personal Representative of the Estate of Melvin G. Welch,  
deceased, Respondent,

v.

Advance Auto Parts, Inc. American Honda Motor Co., Inc. Atlas Asbestos Co., Atlas Turner, Inc. as successor to Atlas Asbestos Co., a foreign company, Bahnson, Inc., Covil Corporation, Daniel International Corporation, Davis Mechanical Contractors, Inc., Ellington Insulation Company, Inc., Fluor Constructors International f/k/a Fluor Corporation, Fluor Constructors International, Inc., Fluor Daniel Services Corporation, Fluor Enterprises, Inc., General Parts, Inc. individually and as successors-in-interest to Carquest Corporation, Goodrich Corporation f/k/a The B. F. Goodrich Company, The Goodyear Tire & Rubber Company, Graybar Electric Company, Inc., Honeywell International, Inc., individually and as successor-by-merger to Borg-Warner Corporation, Occidental Chemical Corporation as successor to Durez Corporation, O'reilly Automotive Stores, Inc., Paramount Global f/k/a Viacombs Inc., f/k/a CBS Corporation, a Delaware corporation f/k/a Viacom, Inc., successor-by-merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation, Pneumo Abex LLC successor-in-interest to Abex Corporation, Redco Corporation f/k/a Crane Co., Reinz Wisconsin Gasket LLC f/k/a and/or successor to Reinz Wisconsin Gasket Co. and Wisconsin Gasket Manufacturing Co., a wholly owned subsidiary of Dco LLC, Rust Engineering & Construction, Inc., Rust International Inc., Southern Insulation, Inc., Spirax Sarco, Inc., Union Carbide Corporation, Westrock MWV, LLC individually and as successor-in-interest to Westvaco, ZF Active Safety US Inc. f/k/a Kelsey-Hayes Company, Petitioners,

*of which*

Atlas Turner, Inc. is the Appellant.

**RECEIVER'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, the Receiver for Atlas Turner, Inc., Peter D. Protopapas, designates the following material for inclusion in the record on appeal. Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to this appeal.

### **Pleadings and Other Filings**

1. Motion for Sanctions and for Appointment of a Receiver, filed May 11, 2023
2. Plaintiff's Fourth Amended Complaint, filed June 16, 2023
3. Motion to Clarify Receivership Order, filed July 25, 2023
4. Report of Receiver and Exhibits, filed August 13, 2023
5. Notice of Misrepresentations and Exhibits, filed August 18, 2023

### **Hearing Transcripts**

1. April 19, 2023 Hearing Transcript
2. May 4, 2023 Hearing Transcript
3. August 21, 2023 Hearing Transcript

### **Circuit Court Orders**

1. May 11, 2023 Contempt Order
2. June 20, 2023 Sanctions Order
3. June 21, 2023 Receivership Order
4. September 8, 2023 Amended Order Regarding Atlas Turner Insurance Assets

SMITH ROBINSON HOLLER DuBOSE  
AND MORGAN, LLC

*s/ Jonatha M. Robinson*  
\_\_\_\_\_  
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*Attorneys for the Receiver  
for Atlas Turner, Inc.'s insurance Assets*

Columbia, South Carolina  
November 6, 2023