

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Jan 17 2024

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Jean Hoefler 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,

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.

and

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

and

Peter D. Protopapas, Duly Appointed Receiver for Atlas Turner, Inc., are the Respondents.

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**PROOF OF SERVICE**

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I certify that a true copy of the Final Brief of the Receiver Peter D. Protopapas in this case has been served on the following, this 17th day of January, 2024, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to subsection (g)(3) of the South Carolina Supreme Court's March 20, 2020 Order, as amended May 29, 2020. Pursuant to subsection (g)(3) of the South Carolina Supreme Court's Order, service on the attorneys admitted pro hac vice is accomplished by service on the associated South Carolina lawyer.

Counsel Served:     **E-Mail**

Stephen L. Brown  
[sbrown@yclaw.com](mailto:sbrown@yclaw.com)  
Russell Grainger Hines  
[rhines@yclaw.com](mailto:rhines@yclaw.com)  
James D. Gandy, III  
[tgandy@yclaw.com](mailto:tgandy@yclaw.com)  
Clement Rivers, LLP  
PO Box 993  
Charleston, SC 29402

*Attorneys for Appellant*

John K. Chandler  
[jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com)  
Brian M. Barnwell  
[bb@rplegalgroup.com](mailto:bb@rplegalgroup.com)  
Rikard & Protopapas, LLC  
PO Box 5640  
Columbia, SC 29250

*Attorneys for Receiver for Insurance Assets of Atlas Turner, Inc.*

Aaron Daniel Chapman  
[achapman@dobslegal.com](mailto:achapman@dobslegal.com)  
Dean, Omar & Branham, LLP  
302 N. Market Street  
Suite 300  
Dallas, TX 75202

John D. Kassel  
[jkassel@kassellaw.com](mailto:jkassel@kassellaw.com)  
Theile Branham McVey  
[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)  
Jamie Rae Rutkoski  
[jrutkoski@kassellaw.com](mailto:jrutkoski@kassellaw.com)  
Kassel McVey  
PO Box 1476  
Columbia, SC 29202-1476

*Attorneys for Respondent Welch*

*s/ Shanon N. Peake*  
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G. Murrell Smith, Jr. (S.C. Bar # 66263)  
**Jonathan M. Robinson (S.C. Bar # 68285)**  
Shanon N. Peake (S.C. Bar #102723)  
Smith Robinson Holler DuBose and Morgan, LLC  
2530 Devine Street, Third Floor  
Columbia, South Carolina 29205  
(803) 254-5445

Attorneys for the Receiver Peter D. Protopapas

January 17, 2024

**From:** [Dot Faulkenberry](#)  
**To:** [sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com); [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com); [tgandy@ycrlaw.com](mailto:tgandy@ycrlaw.com); [John Chandler](#); [Brian Barnwell](#); [achapman@dobslegal.com](mailto:achapman@dobslegal.com); [John Kassel](#); [Theile McVey](#); [jrutkoski@kassellaw.com](mailto:jrutkoski@kassellaw.com)  
**Cc:** [Jon Robinson](#); [Shanon Peake](#); [Murrell Smith](#)  
**Subject:** Welch v Advance Auto, et al- Case No. 2023-001096  
**Date:** Wednesday, January 17, 2024 4:04:00 PM  
**Attachments:** [Final Brief of Receiver with COC. 1.pdf](#)

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On behalf of Shanon Peake, please find attached a copy of the Brief of Receiver Peter D. Protopapas, we are filing with the Court today.

Thank you,



**Dot Faulkenberry**  
*Paralegal*

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|---|--------------------|
| E: <a href="mailto:dot@smithrobinsonlaw.com">dot@smithrobinsonlaw.com</a> | Columbia Office    |
| P: 803.254.5445   | 2530 Devine Street |
| D: 803.704.1101   | Columbia, SC 29205 |
| F: 803.254.5007   |                    |

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