

**THE STATE OF SOUTH CAROLINA  
IN THE  
COURT OF APPEALS**

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Appeal from Richland County  
Court of Common Pleas  
Jean Hoefer Toal, Circuit Court Judge

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Appellate Case No.  
Circuit Court Case No. 2023-CP-40-03108

Heather Donaghy, as Executor of the Estate of Shirley Smiley Potter, Deceased,  
Respondents,  
v.  
4520 Corp, Inc., et al,  
Defendants,

Of which **nonparties** Certain Underwriters at Lloyd's, London and certain London market insurance companies subscribing severally (not jointly) to certain excess policies insuring Asbestos Corporation Limited ("ACL") ("Certain London Market Insurers" or "CLMI")<sup>1</sup> are  
Appellants.

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**NOTICE OF APPEAL**

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RAHN, LLC  
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<sup>1</sup> Certain London market insurance companies as to which certain claims are administered by third-party claims administrator, Resolute Management, Inc., consist of The Scottish Lion Insurance Company Ltd., Tenecom Ltd. (as successor to relevant liabilities of Winterthur Swiss Insurance Company) and Yasuda Fire and Marine Insurance Company (UK) Limited, and now known as Tenecom Ltd.

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Attorneys for the Receiver of Asbestos Corporation Limited

Nonparties Certain Underwriters at Lloyd's, London and certain London market insurance companies subscribing severally (not jointly) to certain excess policies insuring Asbestos Corporation Limited ("ACL") ("Certain London Market Insurers" or "CLMI") hereby appeal the following order of the Honorable Jean Hoefer Toal, Circuit Court Judge:

- **Order on Plaintiffs' and Receiver's Motion for Sanctions and Contempt Against Resolute Management and Certain Underwriters of Lloyd's of London** filed March 22, 2024.

A copy of the appealed order is attached hereto and incorporated herein by reference. Appellants received written notice of entry of the most recent order on March 22, 2024. Appellants further state that all necessary transcripts for this appeal have been ordered from the appropriate court reporter.

This order is immediately appealable pursuant to *Ex parte Whetstone*, 289 S.C. 580, 347 S.E.2d 881 (1986).

Respectfully submitted,

ROBERTSON HOLLINGSWORTH MANOS &  
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March 23, 2024