

**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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Case Nos. 2022-CP-40-05543 and 2023-CP-40-03108  
Appellate Case Nos. 2024-000342 and 2024-000348

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Michael David Link and Sandra Strickland Link

Respondents,

v.

4520 Corp., Inc.; ABB Inc.; Amentum Environment & Energy, Inc.; Armstrong International, Inc.; Asbestos Corporation Limited; AT&T Corp.; Atlas Turner Inc.; Bahnson, Inc.; BASF Catalysts LLC; BASF Corporation; Beatty Investments, Inc.; Bechtel Corporation; Bellsouth, LLC; Bellsouth Telecommunications, LLC; The Bonitz Company; Brenntag North America, Inc.; Brenntag Specialties, LLC; Carboline Company; Carrier Corporation; Celanese Corporation; CNA Holdings LLC; Cooper Crouse-Hinds, LLC; Covil Corporation; Daniel International Corporation; Davis Mechanical Contractors, Inc.; Eaton Corporation; Ellington Insulation Company, Inc.; Emerson Electric Co.; Ericsson Inc.; Fisher Controls International LLC; Flowserve Corporation; Flowserve US Inc.; Fluor Constructors International; Fluor Constructors International, Inc.; Fluor Daniel Services Corporation; Fluor Enterprises, Inc.; General Cable Corporation; General Cable Industries, Inc.; General Electric Company; Gould Electronics Inc.; Goulds Pumps, Incorporated; Graybar Electric Company, Inc.; Great Barrier Insulation Co.; Grinnell LLC; Heat & Frost Insulation Company, Inc.; Henry Pratt Company, LLC; Howden North America Inc.; ITT LLC; J. & L. Insulation, Inc.; K-MAC Services, Inc.; Kohler Co.; Metropolitan Life Insurance Company; Michelin Corporation; Michelin North America, Inc.; Milliken & Company; Nokia of America Corporation; Occidental Chemical Corporation; The Okonite Company, Inc.; Paramount Global; PECW Holding Company; Plastics Engineering Company; Presnell Insulation Co., Inc.; Prysmian Cables and Systems USA, LLC; Raytheon Technologies Corporation; REDCO Corporation; Riley Power Inc.; Rockwell Automation Inc.; R.T. Vanderbilt Holding Company, Inc.; Rust Engineering & Construction, Inc.; Rust International Inc.; Saint-Gobain Abrasives, Inc.; Schneider Electric USA, Inc.; Sequoia Ventures Inc.; Siemens Industry, Inc.; Spence Engineering Company, Inc.; Spirax Sarco, Inc.; SPX Cooling Technologies, LLC; Standard Insulation Company of N. C., Inc.; Starr Davis Company, Inc.; Starr Davis Company of S.C., Inc.; Thermo Electric Company, Inc.; Union Carbide Corporation; Vanderbilt Minerals, LLC; Viking Pump, Inc.; Vistra Intermediate Company LLC; Whittaker, Clark & Daniels, Inc.; The William Powell Company; Wind Up, LTD.; York International Corporation; Zurn Industries, LLC,

Defendants,

Of which, Asbestos Corporation Limited and Atlas Turner, Inc. are the Appellants,

and

Peter D. Protopapas, Duly Appointed Receiver for Asbestos Corporation Limited and Atlas Turner, Inc., is Respondent.

AND

Heather Donaghy, as Personal Representative of the Estate of Shirley Smiley Potter, deceased,

Respondents,

v.

4520 Corp., Inc.; ABB Inc.; Amentum Environment & Energy, Inc.; Armstrong International, Inc.; Asbestos Corporation Limited; Atlas Turner Inc.; Bahnson, Inc.; Beaty Investments, Inc.; Bechtel Corporation; The Bonitz Company; Brenntag North America, Inc.; Brenntag Specialties, LLC; Canvas CT, LLC; Carboline Company; Carrier Corporation; Celanese Corporation; CNA Holdings LLC; Cooper Crouse-Hinds, LLC; Covil Corporation; Daniel International Corporation; Eaton Corporation; Emerson Electric Co.; Ericsson Inc.; Fisher Controls International LLC; Flowserve Corporation; Flowserve US Inc.; Fluor Constructors International; Fluor Constructors International, Inc.; Fluor Daniel Services Corporation; Fluor Enterprises, Inc.; General Cable Corporation; General Cable Industries, Inc.; General Electric Company; Gould Electronics Inc.; Goulds Pumps, Incorporated; Goulds Pumps LLC; Graybar Electric Company, Inc.; Great Barrier Insulation Co.; Grinnell LLC; Henry Pratt Company, LLC; Howden North America Inc.; ITT LLC; K-MAC Services, Inc.; Metropolitan Life Insurance Company; Occidental Chemical Corporation; Paramount Global; PECW Holding Company; Plastics Engineering Company; Presnell Insulation Co., Inc.; Redco Corporation; Riley Power Inc.; Rockwell Automation, Inc.; R.T. Vanderbilt Holding Company, Inc.; Rust Engineering & Construction, Inc.; Rust International Inc.; Saint-Gobain Abrasives, Inc.; Schneider Electric USA, Inc.; Sequoia Ventures Inc.; Siemens Industry, Inc.; Spence Engineering Company, Inc.; Spirax Sarco, Inc.; Standard Insulation Company of N. C., Inc.; Starr Davis Company, Inc.; Starr Davis Company of S.C., Inc.; Thermo Electric Company Inc.; Union Carbide Corporation; Vanderbilt Minerals, LLC; Viking Pump, Inc.; Vistra Intermediate Company LLC; The William Powell Company; York International Corporation; Zurn Industries, LLC, Defendants,

Of which Asbestos Corporation Limited and Atlas Turner, Inc. are Appellants.

and

Peter D. Protopapas, Duly Appointed Receiver for the Insurance Assets of Asbestos Corporation Limited and Atlas Turner, Inc., is Respondent.

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**MOTION TO CORRECT DESIGNATION  
OF PETER D. PROTOPAPAS, RECEIVER**

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Peter D. Protopapas, as the Court-Appointed Receiver for the Insurance Assets of Asbestos Corporation Limited and Atlas Turner, Inc. (“the Receiver”), respectfully requests the Court designate Mr. Protopapas, the Receiver for the Insurance Assets of Asbestos Corporation Limited and Atlas Turner Inc., as a respondent in this appeal. Mr. Protopapas was appointed by the circuit court as the Receiver for Asbestos Corporation Limited and Atlas Turner, Inc. for the limited purpose of marshaling these companies’ insurance assets and administering them consistent with future court orders. However, Asbestos Corporation Limited, by and through its own counsel, and Atlas Turner, Inc., by and through its own counsel, have appealed an order to this Court.

Thus, the Receiver respectfully requests the Court identify the Receiver as a respondent in the appeal. The Receiver’s current counsel—Richard Brandon Larrabee, Robert Turner Bonds, and John Kenneth Chandler—are currently listed as counsel for the appellants on the Court’s case management system and should be designated as counsel for the Receiver along with the below-named counsel who are contemporaneously filing notices of appearance.

*(Signature page follows)*

Respectfully submitted,

s/Shanon N. Peake

G. Murrell Smith, Jr. (S.C. Bar 66263)

Jonathan M. Robinson (S.C. Bar 68285)

**Shanon N. Peake (S.C. Bar 102723)**

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**ATTORNEYS FOR RECEIVER PETER D.  
PROTOPAPAS**

March 26, 2024