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Apr 03 2024

SC Court of Appeals

**ROBERTSON HOLLINGSWORTH
MANOS & RAHN, LLC**
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Charleston, South Carolina 29403
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Dunn D. Hollingsworth
Theodore L. Manos
Paul R. Rahn
Jillian S. Barton
Benjamin M. Virgin

April 3, 2024

Via SC E-Filing Portal:

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Michael David Link, et al. v. 4520 Corp. Inc., et al. and
Heather Donaghy v. 4520 Corp. Inc., et al.
Appellate Case No. 2024-000501

Dear Madam Clerk:

Pursuant to your correspondence of April 2, 2024, noting a deficiency concerning the Notices of Appeal filed by Certain London Market Insurers, please find attached for filing the requisite Proofs of Service which were filed with the Richland County Clerk of Court on April 3, 2024.

Please do not hesitate to contact us should anything further be required to cure the filing deficiency. With kind regards, I remain

Sincerely,

s/Theodore L. Manos

Theodore L. Manos

Attachment

cc: All counsel via email

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April 3, 2024

Via SC E-Filing Portal:

Jeanette McBride, Clerk of Court
Richland County, Court of Common Pleas
1701 Main Street, Suite 205
Columbia, SC 29201

RE: Michael David Link, *et al.* vs. 3M Company, *et al.*
Case No.: 2022-CP-40-05543

Dear Madam Clerk:

Please find attached for filing, the Proof of Service for nonparties Certain London Market Insurers' Notice of Appeal, which was inadvertently left out of the previous filing in the above-referenced matter (said Notice was filed: 3.23.2024 at 2:37 P.M.).

Please do not hesitate to contact us should you have any questions. With kind regards, I remain

Sincerely,

s/Theodore L. Manos

Theodore L. Manos

Attachment

cc: All counsel via NEF

THE STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS

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

Appellate Case No.
Circuit Court Case No. 2022-CP-40-05543

Michael David Link and Sandra Strickland Link,

Respondents,

v.

3M Company, 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")¹ are Appellants.

PROOF OF SERVICE

I, the undersigned, of the law offices of Robertson Hollingsworth Manos & Rahn, LLC, attorney for Appellant, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specified below by e-mailing them at the addresses below:

Pleading(s): Notice of Appeal

¹ 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.

Parties Served:

Peter D. Protopapas pprotopapas@rplegalgroup.com
Robert T. Bonds rbonds@rplegalgroup.com
John Kenneth Chandler jchandler@rplegalgroup.com

Attorneys for the Receiver on behalf of Atlas Corporation Limited

Thiele McVey tmcvey@kassellaw.com
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Charles W. Branham, III tbranham@dobslegal.com
Aaron Chapman achapman@dobslegal.com

Attorneys for Plaintiffs

Stephanie G. Flynn sgflynn@foxrothschild.com
Nicolas J. Cherry ncherry@foxrothschild.com
Attorney for Resolute Management, Inc.

s/Theodore L. Manos

Theodore L. Manos
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Attorney for Non-Parties Certain London Market Insurers

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April 3, 2024

Via SC E-Filing Portal:

Jeanette McBride, Clerk of Court
Richland County, Court of Common Pleas
1701 Main Street, Suite 205
Columbia, SC 29201

RE: Heather Donaghy, *et al.* vs. 4520 Corp. Inc., *et al.*
Case No.: 2023-CP-40-03108

Dear Madam Clerk:

Please find attached for filing, the Proof of Service for nonparties Certain London Market Insurers' Notice of Appeal, which was inadvertently left out of the previous filing in the above-referenced matter (said Notice was filed: 3.23.2024 at 2:23 P.M.).

Please do not hesitate to contact us should you have any questions. With kind regards, I remain

Sincerely,

s/Theodore L. Manos

Theodore L. Manos

Attachment

cc: All counsel via NEF

THE STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS

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

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")¹ are

Appellants.

PROOF OF SERVICE

I, the undersigned, of the law offices of Robertson Hollingsworth Manos & Rahn, LLC, attorney for Appellant, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specified below by e-mailing them at the addresses below:

Pleading(s): Notice of Appeal

¹ 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.

Parties Served:

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Robert T. Bonds rbonds@rplegalgroup.com
John Kenneth Chandler jchandler@rplegalgroup.com

Attorneys for the Receiver on behalf of Atlas Corporation Limited

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s/Theodore L. Manos

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