

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jean Hoefer Toal, Acting Circuit Court Judge

Appellate Case No. 2024-000501
Circuit Court Case Nos. 2022-CP-40-05543, 2023-CP-40-03108

Michael David Link and Sandra Strickland Link.....Plaintiffs,

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,
Beaty 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, In., Great Barrier
Insulation Co., Grinnell LLC, Heat & Frost Insulation Company, Inc., Henry
Pratt Company, LLC, Howden North America Inc., ITT LCC, 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 US, LLC, Raytheon Technologies Corporation,
Redco Corporation, Riley Power In., 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,

and

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

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, In., Great Barrier Insulation Co., Grinnell LLC, Henry Pratt Company, LLC, Howden North America Inc., ITT LCC, 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, Westrock Company, The William Powell Company, Zurn Industries, LLC.....Defendants,

of which

Michael David Scott, Sandra Strickland Link, Heather Donaghy, as Personal Representative of the Estate of Shirley Smiley Potter, deceased, and Asbestos Corporation Limited, by and through its court-appointed Receiver, Peter D. Protopapas, are the.....Respondents,

and

Certain Underwriters at Lloyd's, London, Certain London Market Insurance Companies, and Resolute Management Inc. are the.....Appellants.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below he served counsel for Plaintiffs and the Receiver with the *Initial Brief of Nonparty Appellants Certain Underwriters at Lloyd's, London, Certain London Market Insurance Companies, and Resolute Management Inc.* and the *Nonparty Appellants Certain Underwriters at Lloyd's, London, Certain London Market Insurance Companies, and Resolute Management Inc.'s Designation of Matter to Be Included in the Record on Appeal* as indicated herein below, by emailing a copy of the same at the following addresses:

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Respectfully submitted,

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*Attorney for Certain Underwriters at Lloyd's,
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April 18, 2024

Charleston, South Carolina

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April 18, 2024

VIA EMAIL FILING

The Hon. Jenny A. Kitchings
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Court of Appeals of South Carolina
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RE: *Michael David Link v. 4520 Corp, Inc.* (2)
Appellate Case No. 2024-000501

Dear Ms. Kitchings:

Please find enclosed for filing the *Initial Brief of Nonparty Appellants Certain Underwriters at Lloyd's, London, Certain London Market Insurance Companies, and Resolute Management Inc.* and the *Nonparty Appellants Certain Underwriters at Lloyd's, London, Certain London Market Insurance Companies, and Resolute Management Inc.'s Designation of Matter to Be Included in the Record on Appeal* in reference to the above referenced consolidated matters. I have also enclosed a Certificate of Service indicating service upon counsel for Plaintiffs as well as the Receiver. Please let me know if you need anything further.

Respectfully,

/s/*Theodore L. Manos*
Theodore L. Manos

Enclosures as Stated

cc: Charles William Branham, III, Esq.
Jonathan M. Holder, Esq.
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