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10 December 2024

**By email, International Tracked & Signed  
and International Traced and International  
Post**

Our ref

5346.1

Mr Peter D. Protopapas  
2110N Beltline Blvd,  
Columbia,  
South Carolina 29204,  
United States of America

pdp@rplegalgroup.com

Dear Mr Protopapas,

**BL-2024-001337: Cape Intermediate Holdings Limited and Cape Plc v Peter D. Protopapas (the “Proceedings”)**

We enclose by way of service the final Approved Judgment of Mr Justice Mann of the High Court in London which contains minor editorial changes from the version served on you on 22 November 2024.

We also write further to the Order of Mr Justice Mann of 22 November 2024, our Cease and Desist Notice of 27 November 2024 and our letter of 28 November 2024.

We understand that since receiving the Judgment, the Order and our letters referred to above, you filed on 6 December 2024 with the Supreme Court of South Carolina a Motion to Strike Petitioner’s Supplements to Petitions for Writ of Certiorari and Supplemental Appendix purportedly in your capacity as “*court appointed Receiver for Cape PLC, individually and as successor in interest to Cape Asbestos Company Limited, n/k/a Cape Intermediate Holdings Ltd [CIHL].*” For the avoidance of doubt, this letter does not respond to that Motion and should not be taken as any form of acceptance/acquiescence to the points raised therein.

Your actions are in direct contravention of the Order the High Court which confirms that you have no power or authority to act on behalf of CIHL and specifically that you have no power or authority to act for and on behalf of CIHL in any proceedings in the South Carolina Court or to seek further relief on behalf of CIHL from the South Carolina Court.

It is clear that you are deliberately violating and disregarding the Order of the High Court and continuing to purport to act for and on behalf of CIHL in breach of that Order. We have already drawn your attention to the Penal Notice at the front of the Order which makes it clear that if you disobey the Order you may be held in contempt of court and may be imprisoned, fined or have your assets seized. For the avoidance of doubt, we regard your continued breaches of the Order as constituting a contempt of court and unless you immediately cease and desist from acting in contravention to the Order, our client reserves the right to issue proceedings for contempt against you without further notice.



In this regard, we would also draw to your attention to the fact that contempt proceedings in these circumstances can be brought without the further permission of the Court, to the fact that permission of the Court would likewise not be required for contempt proceedings to be served on you in the United States within the Proceedings, and to the fact that it is no bar to a finding of contempt simply for a defendant to state that they were acting in compliance with the order of another Court.

Further, you will note from paragraphs 111 and 112 of the Judgment that the Court confirmed that you are liable in tort for the losses that have been and continue to be caused by you acting without any authority that is recognised under English law (being the law of CIHL's place of incorporation). By continuing to hold yourself out as acting as agent of CIHL without mandate, permission or authority from CIHL to do so, you are continuing to commit this tort against CIHL and so you are liable to CIHL for losses it has suffered as a result of your actions. In this regard, our client has instructed us to take further action against you unless you confirm by the close of business on Thursday 12 December 2024 that you will immediately comply with the terms of the Judgment and Order as set out and explained in the Cease and Desist Notice and that neither you or your attorneys will take any further steps in any proceedings on behalf of CIHL or Cape Plc.

This letter is also a formal request, on behalf of our clients, that you preserve, and take all necessary steps to preserve and safeguard, any and all documents or data relating to your conduct purportedly on behalf of CIHL and Cape Plc in South Carolina or elsewhere as they will be highly relevant and material to any potential action and claims our clients may wish to pursue against you.

Yours faithfully

**Signature Litigation LLP**

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