

Feb 04 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF CHARLESTON

Isabella Park, Plaintiff,

v.

SUBPOENA IN A CIVIL CASE

Armstrong International, et al, Defendants.

Case Number: 2021CP4002727

Pending in Richland County

TO: RG Investigative Services, LLC, c/o Northwest Registered Agent, LLC, 6650 Rivers Ave., Suite 100, Charleston, SC 29406

[] YOU ARE COMMANDED to appear in the above-named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME ,

[] YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME ,
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[X] YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects):

Any and all documents identified in Exhibit A, attached.

PLACE Smith, Robinson, Holler, DuBose, and Morgan, LLC 3200 Devine Street Columbia, SC 29205	DATE AND TIME January 22, 2026 at 4:00 PM
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[] YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME ,
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ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(e)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Attorney/Issuing Officer's Signature 01/08/2026 Jonathan M. Robinson, Esquire, Attorney for Receiver for Cape
 Indicate if Attorney for Plaintiff or Defendant Date Print Name
 Attorney's Address and Telephone Number : 803-254-5445
 Smith, Robinson Holler, DuBose, and Morgan, LLC, 3200 Devine Street, Columbia, SC 29205

Clerk of Court/Issuing Officer's Signature
Pro Se Litigant's Name, Address and Telephone Number :

Date

Print Name

PROOF OF SERVICE

SERVED	DATE	FEES AND MILEAGE TO BE TENDERED TO WITNESS UPON DAILY ARRIVAL <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
	PLACE	
SERVED ON Registered Agent		MANNER OF SERVICE Certified Mail
SERVED BY Carmen Atkins		TITLE Paralegal

DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on, January 8, 2026


SIGNATURE OF SERVER

Smith Robinson, 3200 Devine St., Columbia, SC 29205
ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises—or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance; or

(ii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or

(iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena:

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1)(A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(6)(B). The court may specify conditions for the discovery.

(2)(A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, the receiving party must take reasonable steps to retrieve the information. The person who produced the information must preserve the information until the claim is resolved.

EXHIBIT A

1. Please produce all communications, documents, letters, blueprints, technical drawings, tape records and notations, minutes, bulletins, booklets, instructions, advertisements, literature, reports, published opinions, treaties, textbooks, records, memoranda, notes, notebooks, worksheets, payment records, drawings, agreements, memoranda of conversations, recordings, photographs, videotapes, diaries, computer printouts, information stored on computers or digital camera but of which no printout presently exists, and all other written, recorded photographic or graphic items and all records of information or communication or whatever type or nature (including electronic mail), in your actual or constructive custody or control, including copies or reproductions of all the previously described items upon which notations and writing have been made which do not appear on the originals, videos, photographs, reports, statements, emails, correspondence or other tangible or ESI relating to any request for you to investigate, surveil, and/or research, any or all of the following "Targets":
 - a. Peter D. Protopapas, individually and as the Court-appointed Receiver for Cape PLC, individually and as successor in interest to Cape Asbestos Company Limited,
 - b. Attorneys for Receiver:
 - i. John T. Lay, Jr., SC Bar
 - ii. Lindsay A. Joyner, SC Bar
 - iii. Olesya V. Bracey, SC Bar
 - iv. Eleanor L. Jones, SC Bar
 - v. Jonathan M. Robinson, SC Bar
 - vi. Shanon N. Peake, SC Bar
 - vii. G. Murrell Smith, Jr., SC Bar
 - viii. Lauren McCulloch Semlinger, TX Bar
 - ix. Brady Edwards, TX Bar
 - x. Paul A. Scrudato, NY Bar,
 - xi. The Honorable Jean H. Toal, (Chief Justice Retired),
 - xii. Members of the South Carolina Court of Appeals,
 - xiii. Member of the South Carolina Supreme Court.
2. Please produce all "Preservation Material" as outlined in the attached "Request for Evidence Preservation".

Reply To: Columbia

January 6, 2026

Ronald Grosse
RG Investigative Services, LLC
P.O. Box 932
Irmo, S.C. 29063
rgrosse1113@gmail.com

REQUEST FOR EVIDENCE PRESERVATION

RE: In The Matter of Peter D. Protopapas, individually and as the Court-appointed Receiver for Cape PLC, individually and as successor in interest to Cape Asbestos Company Limited (hereinafter, "Receiver").

Dear Sir or Madam:

This firm represents Peter D. Protopapas, the court-appointed Receiver for Cape PLC, individually and as successor in interest to Cape Asbestos Company Limited (hereinafter, "Receiver"). See attached Order, *Park et al. v. Armstrong Int'l, Inc. et al.*, No. 2021-CP-4002727 (Mar. 17, 2023). It has come to our attention that you may be in possession of evidence relevant to claims the Receiver has or may have against certain third parties with whom you have been in communication. These communications relate to a request for you to investigate, surveil, and/or research, any or all of the following "Targets":

- (1) Peter D. Protopapas, individually and as the Court-appointed Receiver for Cape PLC, individually and as successor in interest to Cape Asbestos Company Limited,
- (2) Attorneys for Receiver:
 - a. John T. Lay, Jr., SC Bar
 - b. Lindsay A. Joyner, SC Bar
 - c. Olesya V. Bracey, SC Bar
 - d. Eleanor L. Jones, SC Bar
 - e. Jonathan M. Robinson, SC Bar
 - f. Shanon N. Peake, SC Bar
 - g. G. Murrell Smith, Jr., SC Bar
 - h. Lauren McCulloch Semlinger, TX Bar
 - i. Brady Edwards, TX Bar
 - j. Paul A. Scudato, NY Bar,
- (3) The Honorable Jean H. Toal, (Chief Justice Retired),
- (4) Members of the South Carolina Court of Appeals,

(5) Member of the South Carolina Supreme Court.

Upon information and belief, these communications originated from Mohed Altrad, Altrad Investment Authority SAS, Charter Consolidated Ltd., ESAB Corporation, or Central Mining & Investment Corporation Ltd. and/or their attorneys, agents or representatives (hereinafter "Engagement Request").

This letter is to formally demand the preservation of any and all evidence related to the **Engagement Request including but not limited to evidence generated, received, and/or collected in connection with the Engagement Request (collectively "Preservation Material" or "Evidence")**. In order to assure that your obligation to preserve all documents, tangible things and electronically stored information (hereinafter "ESI") is met, please immediately forward a copy of this letter to all persons and entities with custodial responsibility for the items referred to in this letter. While there is currently no formal proceedings pending specific to the Receiver's inquiry regarding the Preservation Material, certain obligations attach to this request which may be relevant should a lawsuit, action, or proceeding be commenced. If you fail to properly secure and preserve these important pieces of evidence, it will give rise to the legal presumption that the evidence would have been harmful to you or any third-party involved in the Engagement Request. If you fail to preserve and maintain this evidence, we will seek any sanctions available under the law. The failure to preserve and retain the documents and things identified in this notice may constitute spoliation of evidence which will subject you to legal claims for damages and/or evidentiary and monetary sanctions. The destruction, alteration, or loss of any of the below constitutes a spoliation of evidence under South Carolina law.

As used in this letter the terms "you" and "your" refers to any and all entities/persons controlled or operated by you or in which you have any interest, and includes but is not limited to any predecessors, successors, parents, subsidiaries, division, affiliates, directors, agents, attorneys, accountants, employees, partners or third parties over whom you have any supervisory authority or ability to control.

We specifically request that the following relating to the Preservation Material, be maintained and preserved and not be destroyed, modified, altered, repaired, or changed in any manner:

- A) All documents, letters, blueprints, technical drawings, tape records and notations, minutes, bulletins, booklets, instructions, advertisements, literature, reports, published opinions, treaties, textbooks, records, memoranda, notes, notebooks, worksheets, payment records, drawings, agreements, memoranda of conversations, recordings, photographs, videotapes, diaries, computer printouts, information stored on computers or digital camera but of which no printout presently exists, and all other written, recorded photographic or graphic items and all records of information or communication or whatever type or nature (including

electronic mail), in your actual or constructive custody or control, including copies or reproductions of all the previously described items upon which notations and writing have been made which do not appear on the originals, videos, photographs, reports, statements, emails, correspondence or other tangible or ESI and documents.

- B) All video and audio surveillance. This data should be stored in the format(s) capable of providing the maximum resolution or quality as well as the most continuous feed. Furthermore, every camera angle or audio recording capable of capturing surveillance from the aforementioned areas should be preserved.
- C) All statements, whether recorded, transcribed, or otherwise reproduced, relating to the Target(s) identified herein above.

ESI should be afforded the broadest possible definition and includes (by way of example and not as an exclusive list) potentially relevant information electronically, magnetically or optically stored as:

1. Digital communications (e-mail, voicemail, text messages, instant messaging)(including but not limited to private, non-public accounts and/or devices);
2. Word processing documents (including but not limited to, Word or WordPerfect or any other documents and drafts);
3. Spreadsheets and Tables (including but not limited to, Excel or Lotus12S worksheets);
4. Image and Facsimile Files (including but not limited to, .pdf, .tiff, .jpg, .gif images, etc.);
5. Sound Recordings (including but not limited to, .wav and .anp3 ifies);
6. Video and Animation (.including but not limited to, avi and .mov files);
7. Databases (including but not limited to, Access, Oracle, SQL Server data, SAP);
8. Contact and Relationship management Data including but not limited to, Outlook and Act!);
9. Presentation (including but not limited to, PowerPoint, Corel Presentations);
10. Network Access and Server Activity Logs;
11. Project Management Application Data;
12. Computer Aided Design/Drawing Files;
13. Backup and Archival Files including but not limited to .zip and cloud-based programs; and
14. Social Media (including but not limited to, Facebook, Instagram, and Twitter)

ESI resides not only in areas of electronic, magnetic, and optical storage media reasonably accessible to you, but also in areas you may deem not reasonably accessible you are obligated to preserve potentially relevant evidence from both these sources of PSI, even if you do not anticipate producing such ESI. This would include any private, non-public accounts and devices of any employees, contractors, officers, or other consultants.

The demand that **you** preserve both accessible and inaccessible ESI is reasonable and necessary. Please be aware that even ESI that you deem reasonably inaccessible must be preserved in the interim so as not to deprive my client of his right to secure evidence or the Court of its right to adjudicate the issue.

PRESERVATION REQUIRES IMMEDIATE INTERVENTION

You must act immediately to preserve potentially relevant ESI in anyway relating to my client's claim. You must maintain all correspondence, communications, emails or other ESI relating to this litigation in any manner whatsoever.

Adequate preservation of ESI requires more than simply refraining from efforts to destroy or dispose of such evidence. **You** must also intervene to prevent loss due to routine operations and employ proper techniques and protocols suited to protection of ESI. Be advised that sources of ESI are altered and erased by continued use of your computers and other devices. Booting a drive, examining its contents or running any application will irretrievably alter the evidence it contains and may constitute unlawful spoliation of evidence. Consequently, alteration and erasure may result from your failure to act diligently and responsibly to prevent loss or corruption of FSL

Nothing in this demand for preservation for ESI should be understood to diminish your concurrent obligation to preserve documents, tangible things, and other potentially relevant evidence.

SUSPENSION OF ROUTINE DESTRUCTION

You are directed to immediately initiate a litigation hold for potentially relevant ESI, documents and tangible things, and to act diligently and in good faith to secure and audit compliance with such litigation hold. **You** are further directed to immediately identify and modify or suspend features of your information systems and devices that, in routine operation, operate to cause the loss of potentially relevant ESI Examples of such features and operations include:

1. Purging the contents of e-mail repositories by age1 capacity or other criteria;
2. Using data or media wiping, disposal, erasure or encryption utilities or devices;
3. Overwriting, erasing, destroying or discarding back up media;
4. Re-assigning, re-imaging or disposing of systems, servers, devices and media;

5. Running antivirus or other programs effecting wholesale metadata alteration,
6. Releasing or purging online storage repositories;
7. using metadata stripper utilities;
8. Disabling server or IM logging, and
9. Executing drive or file defragmentation or compression programs.

GUARD AGAINST DELETION

You should anticipate that your employees, officers, or others may seek to hide, destroy or alter ESI and act to prevent or guard against such actions. Especially where machines have been used to access the internet or for personal communications, you should anticipate that users may seek to delete or destroy information that they regard as personal, confidential or embarrassing and, in doing so, may also delete or destroy potentially relevant ESI. This concern is not one unique to you or employees or officers. It is simply an event that occurs with such regularity in electronic discovery efforts that any custodian of ESI and their counsel are obliged to anticipate and guard against its occurrence.

ANCILLARY PRESERVATION

You must preserve the documents and other tangible items that may be required to access, interpret or search potentially relevant ESI including, log control sheets, specifications, indices, naming protocols, file lists, network diagrams, flow charts, instruction sheets, data entry forms, abbreviation keys, user ID and password rosters or the like.

You must preserve any passwords, keys, or other authenticators requires to access encrypted files or standard CD or DVD optical disk drive if needed to access the encrypted files or run applications, along with installation disks, user manuals and license keys for applications required to access the ESI.

You must preserve any cabling, drivers and hardware, other than a standard 3.5" floppy disk or standard CD or DVD optical disc drive, if needed to access or interpret information on which ESI is stored. This included tape drivers, bar code readers, zip drives and other legacy or proprietary devices.

PRESERVATION PROTOCOLS

We are desirous of working with you to agree upon an acceptable protocol for forensically sound preservation and can supply a suitable protocol if you wish to furnish an inventory of the systems preservation and media to be preserved. If **you** will promptly disclose the preservation protocol you intend to employ perhaps we can identify any points of disagreement and resolve them. A successful and compliant ESI preservation effort requires expertise. If you do not currently

have such expertise at your disposals we urge you to engage the services of an expert in electronic evidence and computer forensics.

DO NOT DELAY PRESERVATION

Should **your** failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

CONFIRMATION OF COMPLIANCE

Please confirm that **you** have taken the steps outlined in this form to preserve ESI and tangible documents potentially relevant to this action. If you have not undertaken the steps outlined above or have taken other actions, please describe what **you** have done to preserve potentially relevant evidence.

Should you have any questions whatsoever regarding this request, please do not hesitate to contact me.

We appreciate your cooperation in this matter.

Sincerely,

Jonathan M. Robinson

JMR/dlf