

From: Finley, Timothy
Sent: Wed, 5 Nov 2025 14:03:17 -0500
To: [REDACTED]
Subject: RE: [EXTERNAL] Call

RECEIVED**Feb 04 2026****S.C. SUPREME COURT**

Great talking to you today, [REDACTED]. Here are some articles that will help give some background.

- https://www.wsj.com/articles/asbestos-bankruptcies-test-reach-of-frequent-south-carolina-receiver-2fb3b665?st=JpbG2n&reflink=desktopwebshare_permalink
- [Toxic Justice, Part 4: Courtroom Collusion](#) (*FITS News*, 11/3/2025)
- [Toxic Justice, Part 3: The Fishing Expeditions](#) (*FITS News*, 10/30/2025)
- [Toxic Justice, Part 2: The Receivership Enterprise](#) (*FITS News*, 10/23/2025)
- [Toxic Justice, Part 1: The South Carolina Asbestos Machine](#) (*FITS News*, 10/21/2025)
- [‘Unfair and recurring’: Concerns with S.C. asbestos judge sent to justices](#) (*Legal Newsline*, 10/22/2025)
- [Court: Lawyer running S.C. asbestos ATM with a ‘bludgeon’](#) (*Legal Newsline*, 10/21/2025)
- [Asbestos judge claims ‘moral fraud’ to back power-grab](#) (*Legal Newsline*, 10/14/2025)
- [‘Unfair and recurring’: Concerns with S.C. asbestos judge sent to justices](#) (*The Black Chronicle*, 10/23/2025)

Once you've had a chance to consider whether you'll be able to work on this, will you let me know? I'm hoping to send the client some estimates later this week.

Thanks!

Tim

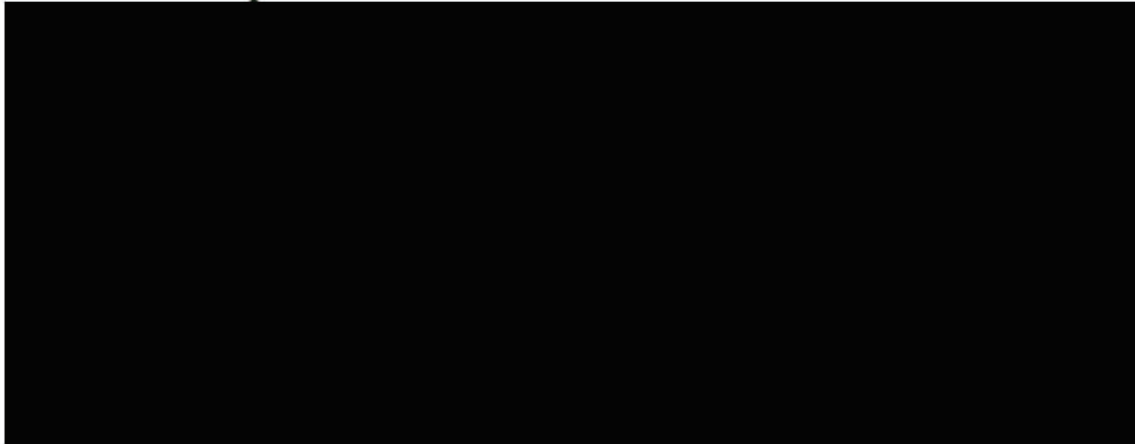
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From: [REDACTED]
Sent: Wednesday, November 5, 2025 10:21 AM
To: Finley, Timothy <timothy.finley@bakermckenzie.com>
Subject: [EXTERNAL] Call

Good morning Mr. Finley

I left you a voicemail; feel free to call me anytime (cell number below). Looking forward to speaking with you.



From: [REDACTED]
Sent: Fri, 14 Nov 2025 10:42:52 -0500
To: 'Finley, Timothy'
Subject: RE: Estimate
Attachments: Asbestos Litigation Overview Estimate.pdf

Good morning. See attached. Look forward to working with you.



From: Finley, Timothy <Timothy.Finley@bakermckenzie.com>
Sent: Thursday, November 13, 2025 4:29 PM
To: [REDACTED]
Subject: Estimate

[REDACTED], can you get me that estimate soon? Thanks!

Tim

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Estimate: South Carolina Judicial System & Asbestos Litigation Analysis Executive Overview

Estimated Time Summary

- 1. Overview of SC Judicial System: 5–7 hours
- 2. Power Structure & Control Points: 6–10 hours
- 3. Background Investigations 10–20 hours
- 4. Receivership Orders & Conflicts: 10–20 hours
- 5. Funds & Escrow Accounts: 5–8 hours
- 6. Pattern Analysis on Rulings: 10–15 hours
- 7. Gatekeepers & Facilitators: 8–10 hours
- 8. Unlawful/Unethical Assessment: 8–10 hours
- 9. Legal Exposure Mapping: 8–10 hours
- 10. Full Report: 10–15 hours

Total Estimated Time: 88–125 hours (research/analysis/full written report)

Cost:

- Retainer: \$5,000 (Rate billed against retainer)
- Hourly Rate: \$300/hour
- Expenses: At Cost
- Trial Rate: \$500/hour (testimony and trial prep)
- Mileage: \$1/mile

Billing Client agrees to be billed incrementally for every \$5,000.00 of work completed. Each invoice will be issued upon reaching this milestone, and payment will be due within 14 days from the date of the invoice. Work will continue in accordance with the project schedule upon receipt of payment.

Investigative Recommendations:

Below is a structured breakdown of the recommended investigative track. All phases and tasks are flexible and may be adjusted at the client’s discretion.

Phase 1

Establish the judicial structure, power centers, receivership history, and initial factual base.

- 1. Overview of the South Carolina Judicial System
 - a. Map SC court hierarchy
 - b. Discuss SC appointment of judges and Judicial Merit Selection Commission structure and impact



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- c. Identify administrative control (SC Court Administration, scheduling, assignments).
 - d. Summarize authority and procedural rules governing receiverships.
 - e. Identify appellate limitations shaping trial-level power.

Estimated Time: 5–7 hours

2. Power Structure & Control Points

- a. Identify who controls case assignments, expert admissibility, discovery, and sanctions.
- b. Identify repeat actors: judges, firms, receivers, administrators.
- c. Relationship mapping.

Estimated Time: 6–10 hours

3. Background Investigations

- a. Full background investigation of persons involved.
 - i. Derogatory background information
 - ii. License information
 - iii. Bar status
 - iv. Etc.
 - v. Business(es) in the subject's (or spouses) name/address.
 - 1. Scope of investigation to be determined by client

Estimated Time: 10–12 Hours

4. Receivership Orders & Conflicts


- a. Pull receivership appointment orders (2017–present).
- b. Identify scope modifications, contempt orders, sanctions.
- c. Compare SC actions to federal bankruptcy rulings and UK High Court injunctions.
- d. Document ACL filings alleging SC overreach.

Estimated Time: 10–20 hours

5. Funds & Escrow Accounts

- a. Identify all court-ordered escrow accounts.
- b. Document authorized signatories.
- c. Map fund flows and fee structures.

Estimated Time: 5–8 hours





Phase 2

Identify patterns showing consistent benefit or disadvantage in litigation outcomes.

6. Pattern Analysis on Rulings

- a. Research written orders in asbestos docket for:
 - i. Expert testimony
 - ii. Evaluate discovery scope (Fishing expedition indicators)
 - iii. Document sanctions trends/threats
- b. Produce pattern matrix comparing rulings by judge and firm.

Estimated Time: 10–15 hours

7. Identify SC Gatekeepers & Facilitators

- a. Identify administrators controlling assignment, sealing, and appointment lists.
- b. Identify recurring insiders.
 - i. Determine if there is a "short list" of "approved" insiders.
- c. Build gatekeeper map.

Estimated Time: 8–10 hours

8. Unlawful/unethical Act(s) Assessment

- a. Apply the Power–Process–Pressure–Payment model.
- b. Evaluate facts against federal statutes: wire fraud, mail fraud, Hobbs Act, money laundering.
- c. Identify potential interstate and international judicial conflicts.

Estimated Time: 8–10 hours

Phase 3

9. Legal Exposure Mapping

- a. Map SC state crimes (if found).
- b. Identify federal crimes (if found).
 - i. Potential RICO (Enterprise and predicate acts)

Estimated Time: 8-10 hours

10. Full report with complaint routes and reporting pathways

Estimated Time: 10–15 hours



From: Finley, Timothy
Sent: Tue, 16 Dec 2025 15:40:02 +0000
To: [REDACTED]
Subject: Altrad matter

[REDACTED], I'm sorry for my delay in getting back to you. This assignment is currently in limbo while we wait for a SC Supreme Court decision. Will revisit in January.

Hope you have a great holiday season!
Tim

Timothy Finley

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