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Feb 17 2026

S.C. SUPREME COURT

AFFIDAVIT

I, Tim Finley, do swear under penalty of perjury based on my own personal knowledge as follows:

1. I am a partner in the Litigation and Government Enforcement practice at Baker & McKenzie LLP. Prior to joining Baker McKenzie in mid-2025, I worked at the United States Department of Justice for 18 years, where I served at both the Antitrust Division and the Consumer Protection Branch. Most recently, I was an Assistant Director leading teams of trial attorneys and investigators working on civil and criminal enforcement actions. I have acted as lead counsel in many trials and investigations that successfully enforced antitrust and consumer protection laws.

2. During my tenure, I received the Attorney General's John Marshall Award for Litigation, the Attorney General's Award for Fraud Prevention, and a Special Commendation for Outstanding Service for my work as lead trial counsel. Before becoming a federal prosecutor, I was a partner at a major law firm, where my practice focused on litigating and trying complex commercial and antitrust cases. During my thirty-year career, I have not been the subject of any finding of professional misconduct.

3. I have reviewed the putative Receiver's Third Motion for Leave to Supplement Motion for Sanctions as to Mohed Altrad and Altrad Investment Authority S.A.S., as well as the supporting Exhibits A-F.

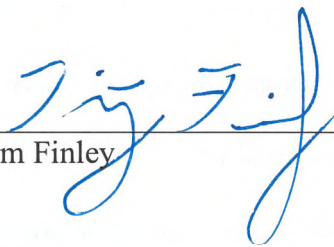
4. As is routine in litigation, I explored the possibility of potentially hiring a legal investigator for the purpose of identifying whether any information supports a possible federal claim against the putative Receiver based on what appears to be *ultra vires* conduct he is taking in the name of Cape Intermediate Holdings Limited.

5. Included within Exhibit C in the putative Receiver's filing is my email of December 16, 2025, informing the investigator that further discussions were "in limbo." I have had no contact with the investigator since that email, nor will I be contacting him.

6. Neither I nor any of my colleagues at Baker McKenzie have engaged or instructed any investigator to proceed with work in South Carolina, or any other jurisdiction, as it relates to this case.

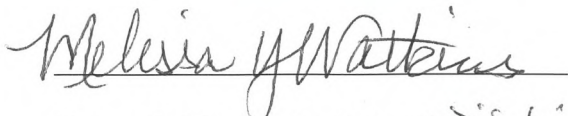
7. Prior to the putative Receiver's Third Motion for Leave to Supplement, I had no contact with any attorneys with the law firm of Womble Bond Dickinson (US) LLP regarding anything associated with this litigation.

8. Nothing in this affidavit should be considered a waiver of the attorney-client privilege, the work product doctrine, or any other privilege recognized under law. Nor should anything in this affidavit be considered a waiver of personal jurisdiction on behalf of either Altrad Investment Authority S.A.S. or Mohed Altrad.



Tim Finley

Sworn to before me this 17th day of February, 2026.



Notary Public for the State of District of Columbia
My Commission Expires: February 14, 2029

