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**From:** [Carroll, Todd](#)  
**To:** [Court Of Appeals Filings](#); [Supreme Court Filings](#)  
**Cc:** [Jon Robinson](#); [Murrell Smith](#); [Jescelyn T. Spitz](#); [Theile McVey](#); [Trey Branham](#); [mark mwhardee](#); [jwhite@spartanlaw.com](#); [Shisko, Marghretta](#); [Chris Jones](#); [Austin Reed](#); [O'Neill, Elizabeth](#); [W Davis](#); [DuBose, Susan](#); [Carnevale, Michael S.](#); [Andy Frankel](#); [Mary Beth Forshaw](#); [A Turner](#); [Dot Faulkenberry](#); [Lindsay Valek](#); [Elizabeth Moultrie](#); [Shanon Peake](#); [Toal, Jean](#); [Perry, Christina M.](#); [Jonathan Holder \(jholder@dobslegal.com\)](#); [Johnson, Debbie \(US\)](#); [O'Neill, Elizabeth](#); [brady.edwards@morganlewis.com](#); [brad.nes@morganlewis.com](#); [nancy.patterson@morganlewis.com](#); [WBD.SCASBESTOS](#)  
**Subject:** USF&G's Petition for a Writ of Certiorari and Appendix (Part 1 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663  
**Date:** Monday, May 3, 2021 6:10:07 PM  
**Attachments:** [image2fd405.PNG](#)  
[image137a5e.PNG](#)  
[imagec7bdf2.PNG](#)  
[image0bc199.PNG](#)  
[Petition for a Writ of Certiorari.pdf](#)  
[Appx in Support of Cert Petition Part1.pdf](#)

Dear Clerks of the Court of Appeals and Supreme Court,

Please find attached for filing USF&G's Petition for a Writ of Certiorari in the *Finch v. USF&G* matter, which was Appellate Case No. 2020-001663 before the Court of Appeals, along with the accompanying Appendix. Because of the size of the Appendix, we will send it along in four separate PDFs; the first is attached to this email. We are electronically filing with the Supreme Court and the Court of Appeals through this email pursuant to Section (c)(6) of Supreme Court Order 2020-05-29-02 and Rule 262(a)(3), SCACR. Additionally, we are serving the Petition on counsel of record via this email, as permitted by Section (g)(3) of that same order and Rule 262(c)(3), SCACR. We will submit a check for the filing fee within five days of this submission, as permitted by Section (c)(6) of Order 2020-05-29-02. Finally, we have copied the circuit court on this correspondence so that it remains aware of the status of this appeal. Best regards,

Todd

**Todd Carroll**

Partner

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**Subject:** Appendix (Part 2 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663  
**Date:** Monday, May 3, 2021 6:23:54 PM  
**Attachments:** [image4ad96c.PNG](#)  
[image4886b7.PNG](#)  
[image5897d2.PNG](#)  
[image28e0ba.PNG](#)  
[Appx in Support of Cert Petition Part2.pdf](#)

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Appendix Part 2 is attached to this email.

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**From:** Carroll, Todd

**Sent:** Monday, May 3, 2021 6:04 PM

**To:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org); [suptctfilings@sccourts.org](mailto:suptctfilings@sccourts.org) <[suptctfilings@sccourts.org](mailto:suptctfilings@sccourts.org)>

**Cc:** [Jon Robinson](mailto:jon@smithrobinsonlaw.com) <[jon@smithrobinsonlaw.com](mailto:jon@smithrobinsonlaw.com)>; [Murrell Smith](mailto:murrell@smithrobinsonlaw.com) <[murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com)>; [Jescelyn T. Spitz](mailto:jspitz@rplegalgroup.com) <[jspitz@rplegalgroup.com](mailto:jspitz@rplegalgroup.com)>; [Theile McVey](mailto:TMcVey@kassellaw.com) <[TMcVey@kassellaw.com](mailto:TMcVey@kassellaw.com)>; [Trey Branham](mailto:tbranhams@dotslegal.com) <[tbranhams@dotslegal.com](mailto:tbranhams@dotslegal.com)>; [mark mwhardee](mailto:mwhardee@bellsouth.net) <[mwhardee@bellsouth.net](mailto:mwhardee@bellsouth.net)>; [jwhite@spartanlaw.com](mailto:jwhite@spartanlaw.com); [Shisko, Marghretta](mailto:mshisko@spartanlaw.com) <[mshisko@spartanlaw.com](mailto:mshisko@spartanlaw.com)>; [Chris Jones](mailto:CJones@spartanlaw.com) <[CJones@spartanlaw.com](mailto:CJones@spartanlaw.com)>; [Austin Reed](mailto:Austin.Reed@smithrobinsonlaw.com) <[Austin.Reed@smithrobinsonlaw.com](mailto:Austin.Reed@smithrobinsonlaw.com)>; [O'Neill, Elizabeth](mailto:Elizabeth.ONeill@wbd-us.com) <[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)>; [W Davis](mailto:wdavis@brblegal.com) <[wdavis@brblegal.com](mailto:wdavis@brblegal.com)>; [DuBose, Susan](mailto:SDuBose@brblegal.com) <[SDuBose@brblegal.com](mailto:SDuBose@brblegal.com)>; [Carnevale, Michael S.](mailto:Michael.Carnevale@stblaw.com) <[Michael.Carnevale@stblaw.com](mailto:Michael.Carnevale@stblaw.com)>; [Andy Frankel](mailto:afrankel@STBLAW.COM) <[afrankel@STBLAW.COM](mailto:afrankel@STBLAW.COM)>; [Mary Beth Forshaw](mailto:mforshaw@stblaw.com) <[mforshaw@stblaw.com](mailto:mforshaw@stblaw.com)>; [A Turner](mailto:aturner@stblaw.com) <[aturner@stblaw.com](mailto:aturner@stblaw.com)>; [Dot Faulkenberry](mailto:Dot@smithrobinsonlaw.com) <[Dot@smithrobinsonlaw.com](mailto:Dot@smithrobinsonlaw.com)>; [Lindsay Valek](mailto:Lindsay.Valek@dotslegal.com)

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**Subject:** Appendix (Part 3 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663  
**Date:** Monday, May 3, 2021 6:12:33 PM  
**Attachments:** [image6b3d1.PNG](#)  
[image8a898e.PNG](#)  
[image9e98e3.PNG](#)  
[image58dde0.PNG](#)  
[Appx in Support of Cert Petition Part3.pdf](#)

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Appendix Part 3 is attached to this email.

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**Cc:** 'Jon Robinson' <jon@smithrobinsonlaw.com>; 'Murrell Smith' <murrell@smithrobinsonlaw.com>; 'Jescelyn T. Spitz' <jspitz@rplegalgroup.com>; 'Theile McVey' <TMcVey@kassellaw.com>; 'Trey Branham' <tbranham@dobslegal.com>; 'mark mwhardee' <mwhardee@bellsouth.net>; 'jwhite@spartanlaw.com' <jwhite@spartanlaw.com>; 'Shisko, Marghretta' <mshisko@spartanlaw.com>; 'Chris Jones' <CJones@spartanlaw.com>; 'Austin Reed' <Austin.Reed@smithrobinsonlaw.com>; 'O'Neill, Elizabeth' <Elizabeth.ONeill@wbd-us.com>; 'W Davis' <wdavis@brblegal.com>; 'DuBose, Susan' <SDuBose@brblegal.com>; 'Carnevale, Michael S.' <Michael.Carnevale@stblaw.com>; 'Andy Frankel' <afrankel@STBLAW.COM>; 'Mary Beth Forshaw'

<mforshaw@stblaw.com>; 'A Turner' <aturner@stblaw.com>; 'Dot Faulkenberry' <Dot@smithrobinsonlaw.com>; 'Lindsay Valek' <Lindsay@rplegalgroup.com>; 'Elizabeth Moultrie' <EMoultrie@kassellaw.com>; 'Shanon Peake' <shanonp@smithrobinsonlaw.com>; 'Toal, Jean' <JToal@sccourts.org>; 'Perry, Christina M.' <cmperry@sccourts.org>; 'Jonathan Holder (jholder@dobslegal.com)' <jholder@dobslegal.com>; Johnson, Debbie (US) <Debbie.Johnson@wbd-us.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; 'brady.edwards@morganlewis.com' <brady.edwards@morganlewis.com>; 'brad.nes@morganlewis.com' <brad.nes@morganlewis.com>; 'nancy.patterson@morganlewis.com' <nancy.patterson@morganlewis.com>; WBD.SCASBESTOS <WBD.SCASBESTOS@wbd-us.com>

**Subject:** Appendix (Part 2 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663

Appendix Part 2 is attached to this email.

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**From:** Carroll, Todd

**Sent:** Monday, May 3, 2021 6:04 PM

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**Cc:** Jon Robinson <[jon@smithrobinsonlaw.com](mailto:jon@smithrobinsonlaw.com)>; Murrell Smith <[murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com)>;

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**Subject:** USF&G's Petition for a Writ of Certiorari and Appendix (Part 1 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663

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**Subject:** Appendix (Part 4 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663  
**Date:** Monday, May 3, 2021 6:14:09 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Appx in Support of Cert Petition Part4.pdf](#)

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Appendix Part 4 is attached to this email. This is the final email for these materials, and it contains the proof of service of the Appendix as well. Thank you,

Todd

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**From:** Carroll, Todd <Todd.Carroll@wbd-us.com>  
**Sent:** Monday, May 3, 2021 6:06 PM  
**To:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org); [suptfilings@sccourts.org](mailto:suptfilings@sccourts.org)  
**Cc:** [Jon Robinson <jon@smithrobinsonlaw.com>](mailto:jon@smithrobinsonlaw.com); [Murrell Smith <murrell@smithrobinsonlaw.com>](mailto:murrell@smithrobinsonlaw.com); [Jescelyn T. Spitz <jspitz@rplegalgroup.com>](mailto:jspitz@rplegalgroup.com); [Theile McVey <TMcVey@kassellaw.com>](mailto:TMcVey@kassellaw.com); [Trey Branham <tbranham@dobslegal.com>](mailto:tbranham@dobslegal.com); [mark mwhardee <mwhardee@bellsouth.net>](mailto:mwhardee@bellsouth.net); [jwhite@spartanlaw.com](mailto:jwhite@spartanlaw.com); [Shisko, Marghretta <mshisko@spartanlaw.com>](mailto:mshisko@spartanlaw.com); [Chris Jones <CJones@spartanlaw.com>](mailto:CJones@spartanlaw.com); [Austin Reed <Austin.Reed@smithrobinsonlaw.com>](mailto:Austin.Reed@smithrobinsonlaw.com); [O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>](mailto:Elizabeth.ONeill@wbd-us.com); [W Davis <wdavis@brblegal.com>](mailto:wdavis@brblegal.com); [DuBose, Susan <SDuBose@brblegal.com>](mailto:SDuBose@brblegal.com); [Carnevale, Michael S. <Michael.Carnevale@stblaw.com>](mailto:Michael.Carnevale@stblaw.com); [Andy Frankel <afrankel@STBLAW.COM>](mailto:afrankel@STBLAW.COM); [Mary Beth Forshaw <mforshaw@stblaw.com>](mailto:mforshaw@stblaw.com); [A Turner <aturner@stblaw.com>](mailto:aturner@stblaw.com); [Dot Faulkenberry <Dot@smithrobinsonlaw.com>](mailto:Dot@smithrobinsonlaw.com); [Lindsay Valek <Lindsay@rplegalgroup.com>](mailto:Lindsay@rplegalgroup.com); [Elizabeth Moultrie <EMoultrie@kassellaw.com>](mailto:EMoultrie@kassellaw.com); [Shanon Peake <shanonp@smithrobinsonlaw.com>](mailto:shanonp@smithrobinsonlaw.com); [Toal, Jean <JToal@sccourts.org>](mailto:JToal@sccourts.org); [Perry, Christina M. <cmperry@sccourts.org>](mailto:cmperry@sccourts.org); [Jonathan Holder \(jholder@dobslegal.com\) <jholder@dobslegal.com>](mailto:jholder@dobslegal.com); [Johnson, Debbie \(US\) <Debbie.Johnson@wbd-us.com>](mailto:Debbie.Johnson@wbd-us.com); [O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>](mailto:Elizabeth.ONeill@wbd-us.com); [brady.edwards@morganlewis.com](mailto:brady.edwards@morganlewis.com); [brad.nes@morganlewis.com](mailto:brad.nes@morganlewis.com); [nancy.patterson@morganlewis.com](mailto:nancy.patterson@morganlewis.com); [WBD.SCASBESTOS <WBD.SCASBESTOS@wbd-us.com>](mailto:WBD.SCASBESTOS@wbd-us.com)  
**Subject:** Appendix (Part 3 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663

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**From:** Carroll, Todd

**Sent:** Monday, May 3, 2021 6:05 PM

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**Subject:** Appendix (Part 2 of 4) in Finch v. USF&G, Court of Appeals Case No. 2020-001663

Appendix Part 2 is attached to this email.

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**From:** Carroll, Todd

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**Subject:** USF&G's Petition for a Writ of Certiorari and Appendix (Part 1 of 4) in *Finch v. USF&G*, Court of Appeals Case No. 2020-001663

Dear Clerks of the Court of Appeals and Supreme Court,

Please find attached for filing USF&G's Petition for a Writ of Certiorari in the *Finch v. USF&G* matter, which was Appellate Case No. 2020-001663 before the Court of Appeals, along with the accompanying Appendix. Because of the size of the Appendix, we will send it along in four separate PDFs; the first is attached to this email. We are electronically filing with the Supreme Court and the Court of Appeals through this email pursuant to Section (c)(6) of Supreme Court Order 2020-05-29-02 and Rule 262(a)(3), SCACR. Additionally, we are serving the Petition on counsel of record via this email, as permitted by Section (g)(3) of that same order and Rule 262(c)(3), SCACR. We will submit a check for the filing fee within five days of this submission, as permitted by Section (c)(6) of Order 2020-05-29-02. Finally, we have copied the circuit court on this correspondence so that it remains aware of the status of this appeal. Best regards,

Todd