

**From:** [Lindsay Joyner](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [James Elliott](#); [Cameron Berthelsen](#); [Marcy Dalton](#); [TMCVey@kassellaw.com](#); [jrutkoski@kassellaw.com](#); [tbranham@dobslegal.com](#); [achapman@dobslegal.com](#); [dhumen@dobslegal.com](#); [khardin@dobslegal.com](#); [tbarnes@dobslegal.com](#); [Peter Protopapas](#); [John Chandler](#); [Brian Barnwell](#); [Todd.carroll@wbd-us.com](#); [kevin.hall@wbd-us.com](#); [Elizabeth.ONeill@wbd-us.com](#); [Steve Pugh](#); [Ben Carlton](#); [Carmen Ganjehsani](#); [Ashwin Sanzgiri](#); [vrawl@grsm.com](#); [Shannon Peake](#); [Jon Robinson](#); [murrell@smithrobinsonlaw.com](#); [John T. Lay](#); [Gray Culbreath](#); [Laura Jordan](#); [Eleanor Jones](#); [sbrown@ycrlaw.com](#); [RHines@ycrlaw.com](#); [tgandy@ycrlaw.com](#); [golive@ycrlaw.com](#); [AJustman@ycrlaw.com](#); [pbell@ycrlaw.com](#); [Helen Elliott](#); [Lindsay Valek](#); [Troy Brown](#); [Amelia Farmer](#); [Dana Becker](#); [Brady Edwards](#); [Robert Jacques](#); [Paul A. Scudato](#); [Lori Seaborn](#)  
**Subject:** Tibbs v. Asbestos Corporation Limited, App. Case Nos.: 2023-002006, 2023-002007, 2023-002008, 2023-002009, 2023-002010, 2023-002011 [IMAN-IMANMAIN.FID1086139]  
**Date:** Tuesday, April 16, 2024 11:01:14 AM  
**Attachments:** [2024.04.16 Motion to Dismiss Interlocutory Appeals and POS.pdf](#)

---

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Madam Clerk,

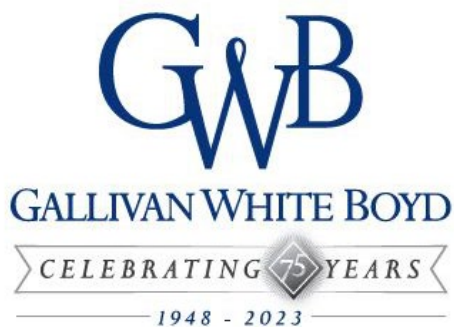
Pursuant to the Supreme Court Order dated May 6, 2022, please find attached Respondent's Motion to Dismiss Interlocutory Appeals in the above-referenced appellate cases. Proof of email service upon all counsel of record is attached in our proof of service.

The filing fee will be sent separately via US Mail.

Please let me know if you have anything additional you need from Respondent regarding this matter.

Thank you for your consideration,

Lindsay



**Lindsay Anne Joyner**  
Partner  
[ljoyner@gwblawfirm.com](mailto:ljoyner@gwblawfirm.com)

**Gallivan, White & Boyd P.A.**  
40 Calhoun Street | Suite 315 | Charleston SC 29401  
843 414 8107 Direct | 843 735 7600 Main | 843 414 8070 Fax  
**Mailing** Post Office Box 22768 | Charleston SC 29413

[vCard](#) | [BioURL](#) | [Website](#)

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

---

**From:** Lindsay Joyner  
**Sent:** Monday, April 1, 2024 6:39 PM  
**To:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
**Cc:** James Elliott <[JElliott@RichardsonPlowden.com](mailto:JElliott@RichardsonPlowden.com)>; Cameron Berthelsen <[CBerthelsen@RichardsonPlowden.com](mailto:CBerthelsen@RichardsonPlowden.com)>; Marcy Dalton <[MDalton@RichardsonPlowden.com](mailto:MDalton@RichardsonPlowden.com)>; TMCVey@kassellaw.com; jrutkoski@kassellaw.com; tbranham@dobslegal.com; achapman@dobslegal.com; dhumen@dobslegal.com; khardin@dobslegal.com; tbarnes@dobslegal.com; Peter Protopapas <[pdp@rplegalgroup.com](mailto:pdp@rplegalgroup.com)>; John Chandler <[jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com)>; Brian

Barnwell <BB@rplegalgroup.com>; Todd.carroll@wbd-us.com; kevin.hall@wbd-us.com; Elizabeth.ONeill@wbd-us.com; Steve Pugh <SPugh@RichardsonPlowden.com>; Ben Carlton <BCarlton@RichardsonPlowden.com>; Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>; Ashwin Sanzgiri <ASanzgiri@RichardsonPlowden.com>; vrawl@grsm.com; Shannon Peake <shanonp@smithrobinsonlaw.com>; Jon Robinson <jon@smithrobinsonlaw.com>; murrell@smithrobinsonlaw.com; John T. Lay <jlay@gwblawfirm.com>; Gray Culbreath <gculbreath@gwblawfirm.com>; Laura Jordan <ljordan@gwblawfirm.com>; Eleanor Jones <ejones@gwblawfirm.com>; sbrown@ycrlaw.com; RHines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; AJustman@ycrlaw.com; pbell@ycrlaw.com; Helen Elliott <HElliott@RichardsonPlowden.com>; Lindsay Valek <Lindsay@rplegalgroup.com>; Troy Brown <troy.brown@morganlewis.com>; Amelia Farmer <afarmer@gwblawfirm.com>; Dana Becker <dana.becker@morganlewis.com>; Brady Edwards <brady.edwards@morganlewis.com>; Robert Jacques <Robert.jacques@morganlewis.com>; Paul A. Scrudato <paul.scrudato@morganlewis.com>; Lori Seaborn <lseaborn@gwblawfirm.com>

**Subject:** Tibbs v. Asbestos Corporation Limited, App. Case Nos.: 2023-002006, 2023-002007, 2023-002008, 2023-002009, 2023-002010, 2023-002011 [IMAN-IMANMAIN.FID1086139]

Madam Clerk,

Pursuant to the Supreme Court Order dated May 6, 2022, please find attached Respondent's Motion to Dismiss Appeals of Interlocutory Discovery Order in the above-referenced appellate cases. Proof of email service upon all counsel of record is attached in our proof of service.

The filing fee will be sent separately via US Mail.

Please let me know if you have anything additional you need from Respondent regarding this matter.

Thank you for your consideration,

Lindsay



**Lindsay Anne Joyner**

Partner

[ljoyner@gwblawfirm.com](mailto:ljoyner@gwblawfirm.com)

**Gallivan, White & Boyd P.A.**

40 Calhoun Street | Suite 315 | Charleston SC 29401

843 414 8107 Direct | 843 735 7600 Main | 843 414 8070 Fax

**Mailing** Post Office Box 22768 | Charleston SC 29413

[vCard](#) | [BioURL](#) | [Website](#)

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.