

**From:** [Carroll, Todd](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [vrawl@grsm.com](#); [kbell@robinsongray.com](#); [sbrown@ycrlaw.com](#); [tgandy@ycrlaw.com](#); Jon Robinson; Shanon Peake; [shanonp@smithrobinsonlaw.com](#); [murrell@smithrobinsonlaw.com](#); [austin.reed@smithrobinsonlaw.com](#); [bb@rplegalgroup.com](#); John Chandler; Theile McVey; [jrutkoski@kassellaw.com](#); [tbranham@dobslegal.com](#); David Humen; O'Neill, Elizabeth; Harry Lee ([hlee@steptoe.com](#)) ([hlee@steptoe.com](#))  
**Subject:** RE: notice of appeal in Mitchell v. 3M (Asbestos Corporation Limited v. Century)  
**Date:** Monday, April 29, 2024 6:52:30 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Travelers" Petition for Rehearing \(Apr. 29, 2024\) \(Appellate Case No. 2024-000341\).pdf](#)

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

Dear Madam Clerk,

Please find attached for filing Travelers' Petition for Rehearing of the order dismissing this appeal. By copy to all counsel, we are serving them with a copy of this filing. We will send the check for the filing fees within five days of this correspondence. We appreciate the Court's consideration of the parties' respective positions. Have a great evening, and best regards,

Todd

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Sent:** Tuesday, March 26, 2024 9:05 AM  
**To:** Carroll, Todd <[Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** [vrawl@grsm.com](#); [kbell@robinsongray.com](#); [sbrown@ycrlaw.com](#); [tgandy@ycrlaw.com](#); Jon Robinson <[jon.robinson@smithrobinsonlaw.com](mailto:jon.robinson@smithrobinsonlaw.com)>; Shanon Peake <[shanon.peake@smithrobinsonlaw.com](mailto:shanon.peake@smithrobinsonlaw.com)>; [shanonp@smithrobinsonlaw.com](#); [murrell@smithrobinsonlaw.com](#); [austin.reed@smithrobinsonlaw.com](#); [bb@rplegalgroup.com](#); John Chandler <[jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com)>; Theile McVey <[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)>; [jrutkoski@kassellaw.com](#); [tbranham@dobslegal.com](#); David Humen <[dhumen@dobslegal.com](mailto:dhumen@dobslegal.com)>; O'Neill, Elizabeth <[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)>; Harry Lee ([hlee@steptoe.com](#)) ([hlee@steptoe.com](#)) <[hlee@steptoe.com](mailto:hlee@steptoe.com)>  
**Subject:** RE: notice of appeal in Mitchell v. 3M (Asbestos Corporation Limited v. Century)

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Carroll, Todd <[Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)>  
**Sent:** Monday, March 25, 2024 6:30 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** [vrawl@grsm.com](#); [kbell@robinsongray.com](#); [sbrown@ycrlaw.com](#); [tgandy@ycrlaw.com](#); Jon

Robinson <[jon.robinson@smithrobinsonlaw.com](mailto:jon.robinson@smithrobinsonlaw.com)>; Shanon Peake <[shanon.peake@smithrobinsonlaw.com](mailto:shanon.peake@smithrobinsonlaw.com)>; [shanonp@smithrobinsonlaw.com](mailto:shanonp@smithrobinsonlaw.com); [murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com); [austin.reed@smithrobinsonlaw.com](mailto:austin.reed@smithrobinsonlaw.com); [bb@rplegalgroup.com](mailto:bb@rplegalgroup.com); John Chandler <[jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com)>; Theile McVey <[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)>; [jrutkoski@kassellaw.com](mailto:jrutkoski@kassellaw.com); [tbranham@dobslegal.com](mailto:tbranham@dobslegal.com); David Humen <[dhumen@dobslegal.com](mailto:dhumen@dobslegal.com)>; O'Neill, Elizabeth <[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)>; Harry Lee ([hlee@steptoe.com](mailto:hlee@steptoe.com)) ([hlee@steptoe.com](mailto:hlee@steptoe.com)) <[hlee@steptoe.com](mailto:hlee@steptoe.com)>

**Subject:** RE: notice of appeal in Mitchell v. 3M (Asbestos Corporation Limited v. Century)

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

Dear Madam Clerk,

Please find attached for filing Travelers' response to the Court's inquiry regarding the appealability of the orders on appeal, along with an accompanying Appendix of materials from the underlying matter. By copy to all counsel, we are serving them with the same. We appreciate the Court's consideration of the attached, and please do not hesitate to call on us if we can provide the Court with any additional materials or information. Best,

Todd

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**From:** Carroll, Todd <[Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)>

**Sent:** Monday, March 11, 2024 11:33 AM

**To:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Cc:** [vrawl@grsm.com](mailto:vrawl@grsm.com); [kbell@robinsongray.com](mailto:kbell@robinsongray.com); [sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com); [tgandy@ycrlaw.com](mailto:tgandy@ycrlaw.com); Jon Robinson <[jon.robinson@smithrobinsonlaw.com](mailto:jon.robinson@smithrobinsonlaw.com)>; Shanon Peake <[shanon.peake@smithrobinsonlaw.com](mailto:shanon.peake@smithrobinsonlaw.com)>; [shanonp@smithrobinsonlaw.com](mailto:shanonp@smithrobinsonlaw.com); [murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com); [austin.reed@smithrobinsonlaw.com](mailto:austin.reed@smithrobinsonlaw.com); [bb@rplegalgroup.com](mailto:bb@rplegalgroup.com); John Chandler <[jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com)>; Theile McVey <[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)>; [jrutkoski@kassellaw.com](mailto:jrutkoski@kassellaw.com); [tbranham@dobslegal.com](mailto:tbranham@dobslegal.com); David Humen <[dhumen@dobslegal.com](mailto:dhumen@dobslegal.com)>; O'Neill, Elizabeth <[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)>; Harry Lee ([hlee@steptoe.com](mailto:hlee@steptoe.com)) ([hlee@steptoe.com](mailto:hlee@steptoe.com)) <[hlee@steptoe.com](mailto:hlee@steptoe.com)>

**Subject:** notice of appeal in Mitchell v. 3M (Asbestos Corporation Limited v. Century)

Dear Madam Clerk,

Please find attached for filing a Notice of Appeal by Travelers Casualty and Surety Company in *Mitchell v. 3M* with respect to a third-party complaint filed by Mr. Protopapas in his capacity as receiver for Asbestos Corporation Limited, along with copies of the orders on appeal and correspondence with the court reporter ordering the relevant transcript.

By copy to counsel for Mr. Protopapas, counsel for ACL, counsel for the underlying plaintiffs, and counsel for the other third-party defendants, we are serving them with a copy of the same.

We will submit our client's filing fee within five business days of this correspondence.

If we can provide the Court with any additional information, please do not hesitate to call on us. Best,

Todd

**Todd Carroll**

Partner

Womble Bond Dickinson (US) LLP

**d:** [803-454-7730](tel:803-454-7730)

**m:** [803-446-2883](tel:803-446-2883)

**e:** [Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)

1221 Main Street

Suite 1600

Columbia, SC 29201



[womblebonddickinson.com](http://womblebonddickinson.com)



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