

From: [Dot Faulkenberry](#)
To: [Court Of Appeals Filings](#)
Cc: [Vic Rawl](#); [John Nichols](#); [tmcvey@kassellaw.com](#); [jrutkoski@kassellaw.com](#); [tbranham@dobslegal.com](#); [achapman@dobslegal.com](#); [dhumen@dobslegal.com](#); [khardin@dobslegal.com](#); [Carroll, Todd](#); [tbarnes@dobslegal.com](#); [Peter Protopapas](#); [jchandler@rplegalgroup.com](#); [Brian Barnwell](#); [Hall, Kevin](#); [ASanzgiri@RichardsonPlowden.com](#); [O'Neill, Elizabeth](#); [JElliott@RichardsonPlowden.com](#); [CBerthelsen@RichardsonPlowden.com](#); [SPugh@RichardsonPlowden.com](#); [BCarlton@RichardsonPlowden.com](#); [CGanjehsani@RichardsonPlowden.com](#); [Jon Robinson](#); [Murrell Smith](#); [ljoyner@gwblawfirm.com](#); [jlay@gwblawfirm.com](#); [gculbreath@gwblawfirm.com](#); [ljordan@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [sbrown@ycrlaw.com](#); [RHines@ycrlaw.com](#); [tgandy@ycrlaw.com](#); [golive@ycrlaw.com](#); [AJustman@ycrlaw.com](#); [dana.becker@morganlewis.com](#); [brady.edwards@morganlewis.com](#); [robert.jacques@morganlewis.com](#); [paul.scrudato@morganlewis.com](#); [Shanon Peake](#); [CMcQueen@RichardsonPlowden.com](#); [Yingling, Donna](#); ["Brown, Troy S."](#); [Meredith Brown](#)
Subject: RE: John A Tibbs v. Asbestos Corporation Limited, et al (Case No.: 2024-001063; 2024-001064; 2024-001065)
Date: Monday, August 26, 2024 2:00:20 PM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[2024.08.26 JMR to COA re objection to extensions, 1, 2.pdf](#)

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

Attached for filing please find a corrected letter.

The previous letter indicated the Receiver was unsure which party Mr. Nichols represented. However, upon further review, the Receiver sees that he is included in the signature block filing the notice of appeal in Appellate Case No. 2024-001065 on behalf of the Charter appellants. The Receiver notes that C-Track has Mr. Nichols incorrectly listed as representing the Receiver in Appellate Case Nos. 2024-001063, 2024-001064, and 2024-001065.

Thank you,



Columbia

3200 Devine Street
Columbia, SC 29205

Camden: 803.432.1992

Sumter: 803.778.2471

Dot Faulkenberry

Paralegal

Office: 803.254.5445

Direct: 803.704.1101

Email: Dot.faulkenberry@smithrobinsonlaw.com

Follow us:  

CONFIDENTIALITY NOTICE: The information transmitted, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer, intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

From: Court Of Appeals Filings <ctappfilings@sccourts.org>

Sent: Monday, August 26, 2024 1:48 PM

To: Dot Faulkenberry <Dot.faulkenberry@smithrobinsonlaw.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Vic Rawl <vrawl@grsm.com>; John Nichols <john@bluesteinattorneys.com>; tmcvey@kassellaw.com; jrutkoski@kassellaw.com; tbranham@dobslegal.com; achapman@dobslegal.com; dhumen@dobslegal.com; khardin@dobslegal.com; Carroll, Todd <Todd.Carroll@wbd-us.com>; tbarnes@dobslegal.com; Peter Protopapas <pdp@rplegalgroup.com>; jchandler@rplegalgroup.com; Brian Barnwell

<bb@rplegalgroup.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; ASanzgiri@RichardsonPlowden.com; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; JElliott@RichardsonPlowden.com; CBerthelsen@RichardsonPlowden.com; SPugh@RichardsonPlowden.com; BCarlton@RichardsonPlowden.com; CGanjehsani@RichardsonPlowden.com; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; Murrell Smith <murrell@smithrobinsonlaw.com>; ljoyner@gwblawfirm.com; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljordan@gwblawfirm.com; ejones@gwblawfirm.com; sbrown@ycrlaw.com; RHines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; AJustman@ycrlaw.com; dana.becker@morganlewis.com; brady.edwards@morganlewis.com; robert.jacques@morganlewis.com; paul.scrudato@morganlewis.com; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; CMcQueen@RichardsonPlowden.com; Yingling, Donna <Donna.Yingling@wbd-us.com>; 'Brown, Troy S.' <troy.brown@morganlewis.com>; Meredith Brown <meredith@bluesteinattorneys.com>

Subject: RE: John A Tibbs v. Asbestos Corporation Limited, et al (Case No.: 2024-001063; 2024-001064; 2024-001065)

Dear Counsel:

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

Thank you.

From: Dot Faulkenberry <Dot.faulkenberry@smithrobinsonlaw.com>

Sent: Monday, August 26, 2024 1:08 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Vic Rawl <vrawl@grsm.com>; John Nichols <john@bluesteinattorneys.com>; tmcvey@kassellaw.com; jrutkoski@kassellaw.com; tbranham@dobslegal.com; achapman@dobslegal.com; dhumen@dobslegal.com; khardin@dobslegal.com; Carroll, Todd <Todd.Carroll@wbd-us.com>; tbarnes@dobslegal.com; Peter Protopapas <pdp@rplegalgroup.com>; jchandler@rplegalgroup.com; Brian Barnwell <bb@rplegalgroup.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; ASanzgiri@RichardsonPlowden.com; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; JElliott@RichardsonPlowden.com; CBerthelsen@RichardsonPlowden.com; SPugh@RichardsonPlowden.com; BCarlton@RichardsonPlowden.com; CGanjehsani@RichardsonPlowden.com; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; Murrell Smith <murrell@smithrobinsonlaw.com>; ljoyner@gwblawfirm.com; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljordan@gwblawfirm.com; ejones@gwblawfirm.com; sbrown@ycrlaw.com; RHines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; AJustman@ycrlaw.com; dana.becker@morganlewis.com; brady.edwards@morganlewis.com; robert.jacques@morganlewis.com; paul.scrudato@morganlewis.com; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; CMcQueen@RichardsonPlowden.com; Yingling, Donna <Donna.Yingling@wbd-us.com>; 'Brown, Troy S.' <troy.brown@morganlewis.com>; Meredith Brown <meredith@bluesteinattorneys.com>

Subject: RE: John A Tibbs v. Asbestos Corporation Limited, et al (Case No.: 2024-001063; 2024-001064; 2024-001065)

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

Please find attached correspondence from Jon Robinson regarding the above appeals.

Thank you,



Columbia

3200 Devine Street
Columbia, SC 29205

Camden: 803.432.1992

Sumter: 803.778.2471

Dot Faulkenberry

Paralegal

Office: 803.254.5445

Direct: 803.704.1101

Email: Dot.faulkenberry@smithrobinsonlaw.com

Follow us:  

CONFIDENTIALITY NOTICE: The information transmitted, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer, intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

From: Carroll, Todd <Todd.Carroll@wbd-us.com>

Sent: Monday, August 26, 2024 11:59 AM

To: Meredith Brown <meredith@bluesteinattorneys.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Vic Rawl <vrawl@grsm.com>; John Nichols <john@bluesteinattorneys.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>; jchandler@rplegalgroup.com; Brian Barnwell <bb@rplegalgroup.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; ASanzgiri@RichardsonPlowden.com; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; JElliott@RichardsonPlowden.com; CBerthelsen@RichardsonPlowden.com; SPugh@RichardsonPlowden.com; BCarlton@RichardsonPlowden.com; CGanjehsani@RichardsonPlowden.com; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; Murrell Smith <murrell@smithrobinsonlaw.com>; ljoyner@gwblawfirm.com; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljordan@gwblawfirm.com; eiones@gwblawfirm.com; sbrown@ycrlaw.com; RHines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; AJustman@ycrlaw.com; dana.becker@morganlewis.com; brady.edwards@morganlewis.com; robert.jacques@morganlewis.com; paul.scrudato@morganlewis.com; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; CMcQueen@RichardsonPlowden.com; Yingling, Donna <Donna.Yingling@wbd-us.com>; 'Brown, Troy S.' <troy.brown@morganlewis.com>

Subject: RE: John A Tibbs v. Asbestos Corporation Limited, et al (Case No.: 2024-001063; 2024-001064; 2024-001065)

Dear Madam Clerk,

On behalf of the Altrad Defendants, we would respectfully that any extension granted apply to Appellants so that the briefing on the motion to dismiss stays on a single schedule, rather than having different parties having to file memoranda at different times. We are glad to submit a \$50 check as well if needed to join Mr. Nichols's request below. Best,

Todd

Todd Carroll

Partner

Womble Bond Dickinson (US) LLP

d: 803-454-7730

m: 803-446-2883

e: Todd.Carroll@wbd-us.com

1221 Main Street

Suite 1600

Columbia, SC 29201



womblebonddickinson.com



This email is sent for and on behalf of Womble Bond Dickinson (US) LLP. Womble Bond Dickinson (US) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebonddickinson.com/us/legal-notice for further details.

From: Meredith Brown <meredith@bluesteinattorneys.com>

Sent: Monday, August 26, 2024 11:36 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Vic Rawl <vrawl@grsm.com>; John Nichols <john@bluesteinattorneys.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>; jchandler@rplegalgroup.com; Brian Barnwell <bb@rplegalgroup.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; ASanzgiri@RichardsonPlowden.com; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; JElliott@RichardsonPlowden.com; CBerthelsen@RichardsonPlowden.com; SPugh@RichardsonPlowden.com; BCarlton@RichardsonPlowden.com; CGanjehsani@RichardsonPlowden.com; jon@smithrobinsonlaw.com; murrell@smithrobinsonlaw.com; ljoyner@gwblawfirm.com; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljordan@gwblawfirm.com; ejones@gwblawfirm.com; sbrown@ycrlaw.com; RHines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; AJustman@ycrlaw.com; dana.becker@morganlewis.com; brady.edwards@morganlewis.com; robert.jacques@morganlewis.com; paul.scrudato@morganlewis.com; shanonp@smithrobinsonlaw.com; CMcQueen@RichardsonPlowden.com; Yingling, Donna <Donna.Yingling@wbd-us.com>; Carroll, Todd <Todd.Carroll@wbd-us.com>; 'Brown, Troy S.' <troy.brown@morganlewis.com>

Subject: John A Tibbs v. Asbestos Corporation Limited, et al (Case No.: 2024-001063; 2024-001064; 2024-001065)

Dear Ms. Harrison,

I am writing on behalf of John Nichols this morning as he is currently out of town. Mr. Nichols would request a ten (10) day Extension to respond to the pending Motion to Dismiss in the above-referenced matters. A \$50.00 check will be mailed via USPS today, to be delivered within five (5) days.

I have copied all counsel of record on this e-mail.

If you need anything else, please do not hesitate to let me know at your earliest convenience.

Thank you,
Meredith Brown

**MEREDITH BROWN OFFICE MANAGER &
LEGAL ASSISTANT TO JOHN S. NICHOLS &
WILLIAM B KOONTZ**

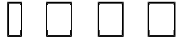
1614 TAYLOR STREET | PO BOX 7965

COLUMBIA, SOUTH CAROLINA 29202

O: 803.779.7599 F: 803.771.8097

MEREDITH@BLUESTEINATTORNEYS.COM

BLUESTEINATTORNEYS.COM



NOTICE: This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please notify the sender and delete this message from your device.

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.