

**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](#)

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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**

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**Sumter:** 803.778.2471

**Dot Faulkenberry**

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**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.

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**From:** Dot Faulkenberry <[Dot.faulkenberry@smithrobinsonlaw.com](mailto:Dot.faulkenberry@smithrobinsonlaw.com)>

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

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**Cc:** Vic Rawl <[vrawl@grsm.com](mailto:vrawl@grsm.com)>; John Nichols <[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)>; [tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com); [jrutkoski@kassellaw.com](mailto:jrutkoski@kassellaw.com); [tbranham@dobslegal.com](mailto:tbranham@dobslegal.com); [achapman@dobslegal.com](mailto:achapman@dobslegal.com); [dhumen@dobslegal.com](mailto:dhumen@dobslegal.com); [khardin@dobslegal.com](mailto:khardin@dobslegal.com); Carroll, Todd <[Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)>; [tbarnes@dobslegal.com](mailto:tbarnes@dobslegal.com); Peter Protopapas <[pdp@rplegalgroup.com](mailto:pdp@rplegalgroup.com)>; [jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com); Brian Barnwell <[bb@rplegalgroup.com](mailto:bb@rplegalgroup.com)>; Hall, Kevin <[Kevin.Hall@wbd-us.com](mailto:Kevin.Hall@wbd-us.com)>; ASanzgiri@RichardsonPlowden.com; O'Neill, Elizabeth <[Elizabeth.ONeill@wbd-us.com](mailto: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](mailto:jon.robinson@smithrobinsonlaw.com)>; Murrell Smith <[murrell@smithrobinsonlaw.com](mailto: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](mailto:shanon.peake@smithrobinsonlaw.com)>; CMcQueen@RichardsonPlowden.com; Yingling, Donna <[Donna.Yingling@wbd-us.com](mailto:Donna.Yingling@wbd-us.com)>; 'Brown, Troy S.' <[troy.brown@morganlewis.com](mailto:troy.brown@morganlewis.com)>; Meredith Brown <[meredith@bluesteinattorneys.com](mailto:meredith@bluesteinattorneys.com)>

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

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

Thank you,



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

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

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

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

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**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**

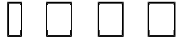
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