

From: [Carroll, Todd](#)
To: [Court Of Appeals Filings](#)
Cc: [James Elliott](#); [Lindsay Joyner](#); [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](#); [Hall, Kevin](#); [O'Neill, Elizabeth](#); [Steve Pugh](#); [Ben Carlton](#); [Carmen Ganjehsani](#); [Ashwin Sanzgiri](#); [vrawl@grsm.com](#); [Shannon Peake](#); [Jon Robinson](#); [murrell@smithrobinsonlaw.com](#); [John T. Lay](#); [Gray Culbreath](#); [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](#); [Dana Becker](#); [Brady Edwards](#); [Robert Jacques](#); [Paul A. Scrudato](#); [Lori Seaborn](#); [Olesya Bracey](#); [Ian Conits](#); [Yingling, Donna](#); [john@blusteinattorneys.com](#)
Subject: RE: Tibbs v. Asbestos Corporation Limited et al, App. Case Nos.: 2024-001063, 2024-001064, 2024-001065 [IMAN-IMANMAIN.FID1086139]
Date: Thursday, September 5, 2024 3:27:57 PM
Attachments: [image102217.png](#)
[image435094.png](#)
[image704486.png](#)
[image672174.png](#)
[Altrad Defendants' Response in Opposition to Motion to Dismiss Appeal \(Appellate Case Nos. 2023-002006, 2024-001063\) \(Sept. 5, 2024\).pdf](#)

***** 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 the Altrad Defendants' memorandum in opposition to the Receiver's motion to dismiss this appeal. By copy to opposing counsel, we are serving them with a copy of the same. We appreciate the Court's consideration of the parties' arguments. Have a good afternoon, and best regards,

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: Lindsay Joyner <ljoyner@gwblawfirm.com>

Sent: Friday, August 16, 2024 4:53 PM

To: ctappfilings@sccourts.org

Cc: James Elliott <JElliott@RichardsonPlowden.com>; Cameron Berthelsen <CBerthelsen@RichardsonPlowden.com>; Marcy Dalton <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>; John Chandler <jchandler@rplegalgroup.com>; Brian Barnwell <BB@rplegalgroup.com>; Carroll, Todd <Todd.Carroll@wbd-us.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth <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>; 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>; Dana Becker <dana.becker@morganlewis.com>; Brady Edwards <brady.edwards@morganlewis.com>; Robert Jacques <Robert.jacques@morganlewis.com>; Paul A. Scudato <paul.scudato@morganlewis.com>; Lori Seaborn <lseaborn@gwblawfirm.com>; Olesya Bracey <obracey@gwblawfirm.com>; Ian Conits <iconits@gwblawfirm.com>

Subject: Tibbs v. Asbestos Corporation Limited et al, App. Case Nos.: 2024-001063, 2024-001064, 2024-001065 [IMAN-IMANMAIN.FID1086139]

Madam Clerk,

Pursuant to the Supreme Court's Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), please find attached Respondent's Motion to Dismiss Appeals of Interlocutory Orders in the above-referenced appellate cases. Proof of email service upon all counsel of record is attached in our proof of service as well as such counsel are copied here. The Motion filing fee is being 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

Gallivan, White & Boyd P.A.
40 Calhoun Street | Suite 315 | Charleston SC 29401
843 414 8107 Direct | [843 735 7600](tel:8437357600) Main | [843 414 8070](tel:8434148070) 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.