

RECEIVED

Nov 12 2024

STATE OF SOUTH CAROLINA ) S.C. SUPREME COURT ) IN THE COURT OF COMMON PLEAS )  
 ) ) FOR THE FIFTH JUDICIAL CIRCUIT )  
COUNTY OF RICHLAND ) )

JOHN A. TIBBS and MARGARET B. TIBBS, ) Civil Action No. 2023-CP-40-01759 )

Plaintiffs, )

v. )

3M COMPANY, *et al.*, )

Defendants. )

\*\*\*\*\* )

CAPE PLC, individually and as successor in )  
interest to CAPE ASBESTOS COMPANY )  
LIMITED, by and through its duly appointed )  
Receiver Peter D. Protopapas, )

Third-Party Plaintiff, )

v. )

ANGLO AMERICAN PLC, *et al.*, )

Third-Party Defendants. )

In Re:  
Asbestos Personal Injury Litigation  
Coordinated Docket

**STIPULATION OF DISMISSAL  
WITHOUT PREJUDICE OF THIRD-  
PARTY DEFENDANTS ARRANCO  
US, LLC, HAWK BIDCO (US) INC.,  
AND SPARROWS OFFSHORE, LLC**

**(DOES NOT END CASE AGAINST  
OTHER PARTIES)**

Pursuant to Rule 41(a)(1)(B) of the South Carolina Rules of Civil Procedure, the parties hereby stipulate to the dismissal, without prejudice, of Third-Party Defendants ArranCo US, LLC, Hawk Bidco (US) Inc., and Sparrows Offshore, LLC. The parties further stipulate that this dismissal does not act as an adjudication on the merits. The parties will each bear their own fees and costs. By entering this stipulation, the Third-Party Defendants do not waive, and specifically preserve, all defenses, including but not limited to the defense of lack of personal jurisdiction.

ELECTRONICALLY FILED - 2024 Nov 07 2:59 PM - RICHLAND - COMMON PLEAS - CASE#2023CP4001759

**RICHARDSON, PLOWDEN &  
ROBINSON, PA**

s/ Steven J. Pugh

Steven J. Pugh (SC Bar No. 14341)  
1900 Barnwell Street  
Post Office Drawer 7788 (29202)  
Columbia, South Carolina 29201  
(803) 771-4400  
[spugh@richardsonplowden.com](mailto:spugh@richardsonplowden.com)

*Attorney for Third-Party Defendants  
ArranCo US, LLC, Hawk Bidco (US) Inc.,  
and Sparrows Offshore, LLC*

**RICHARDSON PLOWDEN &  
ROBINSON, P.A**

s/ James H. Elliott, Jr.

James H. Elliott, Jr. (SC Bar No. 13620)  
235 Magrath Darby Blvd., Suite 100  
Mt. Pleasant, South Carolina 29464  
(843) 805-6550  
[jelliott@richardsonplowden.com](mailto:jelliott@richardsonplowden.com)

*Attorney for Third-Party Defendants Anglo  
American plc, De Beers plc, De Beers  
Consolidated Mines (Pty.) Ltd., De Beers UK  
Limited, and De Beers Centenary AG*

**WOMBLE BOND DICKINSON (US)  
LLP**

s/ M. Elizabeth O'Neill

M. Elizabeth O'Neill (SC Bar No. 104013)  
One Wells Fargo Center  
301 South College Street, Suite 3500  
Charlotte, North Carolina 28202-6037  
(704) 350-6310  
[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)

*Attorney for Third Party Defendants Altrad  
Investment Authority S.A.S. and Mohed  
Altrad*

November 7, 2024

**GALLIVAN, WHITE & BOYD, P.A.**

s/ John T. Lay, Jr.

John T. Lay, Jr. (SC Bar No. 64526)  
1201 Main Street, Suite 1200  
Post Office Box 7368 (29202)  
Columbia, South Carolina 29201  
(803) 779-1833  
[jlay@gwblawfirm.com](mailto:jlay@gwblawfirm.com)

*Attorney for Third-Party Plaintiff*

**GORDON REES SCULLY  
MANSUKHANI LLP**

s/ A. Victor Rawl, Jr.

A. Victor Rawl, Jr. (SC Bar No. 9261)  
677 King Street, Suite 450  
Charleston, South Carolina 29403  
(843) 278-5900  
[vrawl@grsm.com](mailto:vrawl@grsm.com)

*Attorney for Third-Party Defendants Charter  
Consolidated Ltd., ESAB Corporation, and  
Central Mining & Investment Corporation Ltd*