

**From:** [Carroll, Todd](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [jlay@gwblawfirm.com](#); [gculbreath@gwblawfirm.com](#); [Ashwin Sanzgiri](#); [ljoyner@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [jon@smithrobinsonlaw.com](#); [shanonp@smithrobinsonlaw.com](#); [murrell@smithrobinsonlaw.com](#); [pdp@rplegalgroup.com](#); [Shanon Peake](#); [vrawl@grsm.com](#); [john@bluesteinattorneys.com](#); [Hall, Kevin](#); [O'Neill, Elizabeth](#); [Steve Pugh](#); [Ben Carlton](#); [brady.edwards@morganlewis.com](#); [Carmen Ganjehsani](#); [Charity McQueen](#); [Jacques, Robert](#); [paul.scrudato@morganlewis.com](#); [Jon Robinson](#); [Shanon Peake](#); [Theile McVey](#); [jkassel@kassellaw.com](#); [jrutkoski@kassellaw.com](#); [tbranham@dobslegal.com](#); [kpaul@dobslegal.com](#); [David Humen](#); [jelliott@richardsonplowden.com](#); [cberthelsen@richardsonplowden.com](#); [Steve Pugh](#); [Ben Carlton](#); [Carmen Ganjehsani](#); [John Nichols](#); [vrawl@grsm.com](#); [sbrown@ycrlaw.com](#); [tgandy@ycrlaw.com](#); [sgriffith@ycrlaw.com](#); [Yingling, Donna](#); [Jon Robinson](#); [jharling@harlingandwest.com](#)  
**Subject:** notice of appeal in Tibbs v. Asbestos Corporation Limited  
**Date:** Thursday, December 5, 2024 3:06:37 PM  
**Attachments:** [image032666.png](#)  
[image158517.png](#)  
[image177493.png](#)  
[image945503.png](#)  
[Notice of Appeal \(Modification Order from Park\).pdf](#)  
[Order Granting Receiver's Motion to Clarify Order \(Nov. 5, 2024\).pdf](#)  
[UK Judgment--Cape Intermediate v. Protopapas.pdf](#)  
[UK Order--Cape Intermediate v Protopapas.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 a notice of appeal, the order on appeal, and two additional filings that are referenced in the notice. As explained in the notice, our clients are filing this notice on a precautionary basis, and do so without waiving any of their jurisdictional arguments. By copy to all counsel, we are serving them with these materials. We will submit the requisite filing fee within five business days of this message. As always, we appreciate the Court's consideration of our clients' position. Best,

Todd

**Todd Carroll**

Partner

Womble Bond Dickinson (US) LLP

**d:** 803-454-7730

**m:** 803-446-2883

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

1221 Main Street

Suite 1600

Columbia, SC 29201



[womblebond dickinson.com](http://womblebond dickinson.com)



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.womblebond Dickinson.com/us/legal-notice](http://www.womblebond Dickinson.com/us/legal-notice) for further details.