

From: [Vic Rawl](#)
To: [Court Of Appeals Filings](#)
Cc: [jlay@gwblawfirm.com](#); [gculbreath@gwblawfirm.com](#); [Ashwin Sanzgiri](#); [Carroll, Todd](#); [ljoyner@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [jon@smithrobinsonlaw.com](#); [shanonp@smithrobinsonlaw.com](#); [murrell@smithrobinsonlaw.com](#); [pdp@rplegalgroup.com](#); [Shanon Peake](#); [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](#); [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 7:01:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.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](#)

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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.

Respectfully submitted,

Vic

A. VICTOR RAWL, JR. (He/Him/His)
Office Managing Partner

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YOUR 50 STATE LAW FIRM™

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From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Thursday, December 5, 2024 2:16 PM
To: Carroll, Todd <Todd.Carroll@wbd-us.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; Ashwin Sanzgiri

<ASanzgiri@RichardsonPlowden.com>; ljoyner@gwblawfirm.com; ejones@gwblawfirm.com; jon@smithrobinsonlaw.com; shanonp@smithrobinsonlaw.com; murrell@smithrobinsonlaw.com; pdp@rplegalgroup.com; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; Vic Rawl <vrawl@grsm.com>; john@bluesteinattorneys.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>; brady.edwards@morganlewis.com; Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>; Charity McQueen <CMcQueen@RichardsonPlowden.com>; Jacques, Robert <robert.jacques@morganlewis.com>; paul.scrudato@morganlewis.com; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; Theile McVey <tmcvey@kassellaw.com>; jkassel@kassellaw.com; jrutkoski@kassellaw.com; tbranham@dobslegal.com; kpaul@dobslegal.com; David Humen <dhumen@dobslegal.com>; jelliott@richardsonplowden.com; cberthelsen@richardsonplowden.com; Steve Pugh <SPugh@RichardsonPlowden.com>; Ben Carlton <BCarlton@RichardsonPlowden.com>; Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>; John Nichols <john@bluesteinattorneys.com>; Vic Rawl <vrawl@grsm.com>; sbrown@ycrlaw.com; tgandy@ycrlaw.com; sgriffith@ycrlaw.com; Yingling, Donna <Donna.Yingling@wbd-us.com>; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; jharling@harlingandwest.com
Subject: RE: notice of appeal in Tibbs v. Asbestos Corporation Limited

Dear Counsel:

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

Thank you.

From: Carroll, Todd <Todd.Carroll@wbd-us.com>
Sent: Thursday, December 5, 2024 3:03 PM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; Ashwin Sanzgiri <ASanzgiri@RichardsonPlowden.com>; ljoyner@gwblawfirm.com; ejones@gwblawfirm.com; jon@smithrobinsonlaw.com; shanonp@smithrobinsonlaw.com; murrell@smithrobinsonlaw.com; pdp@rplegalgroup.com; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; vrawl@grsm.com; john@bluesteinattorneys.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>; brady.edwards@morganlewis.com; Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>; Charity McQueen <CMcQueen@RichardsonPlowden.com>; Jacques, Robert <robert.jacques@morganlewis.com>; paul.scrudato@morganlewis.com; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; Theile McVey <tmcvey@kassellaw.com>; jkassel@kassellaw.com; jrutkoski@kassellaw.com; tbranham@dobslegal.com; kpaul@dobslegal.com; David Humen <dhumen@dobslegal.com>; jelliott@richardsonplowden.com; cberthelsen@richardsonplowden.com; Steve Pugh <SPugh@RichardsonPlowden.com>; Ben Carlton <BCarlton@RichardsonPlowden.com>; Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>; John Nichols <john@bluesteinattorneys.com>; vrawl@grsm.com; sbrown@ycrlaw.com; tgandy@ycrlaw.com; sgriffith@ycrlaw.com; Yingling, Donna <Donna.Yingling@wbd-us.com>; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; jharling@harlingandwest.com
Subject: notice of appeal in Tibbs v. Asbestos Corporation Limited

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Todd

Todd Carroll

Partner

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