

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED
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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jean Hoefler Toal, Chief Justice (Ret.)

S.C. SUPREME COURT

Case No. 2023-CP-40-01759

Appellate Case No. 2023-001461

John A. Tibbs and Margaret B. Tibbs, Respondents,

v.

3M Company; 4520 Corp., Inc.; A.O. Smith Corporation; A.W. Chesterton Company; ABB Inc.; Air & Liquid Systems Corporation; AiW-2010 Wind Down Corp.; Amentum Environment & Energy, Inc.; Anchor/Darling Valve Company; Armstrong International, Inc.; Asbestos Corporation Limited; ASCO, L.P.; Atlas Asbestos Co; Atlas Turner, Inc.; AWT Air Company, Inc.; Bahnson, Inc.; Banner Industries International, Inc.; Banner Industries, LLC; Banner Industries Of N.E., Inc.; Barretts Minerals Inc.; Beatty Investments, Inc.; Bechtel Corporation; The Bonitz Company; Brand Insulations, Inc.; BW/IP Inc.; Canvas Ct, LLC; Cape PLC; Carboline Company; CB&I Laurens, Inc.; Cleaver-Brooks, Inc.; Consolidated Electrical Distributors, Inc.; Copes-Vulcan, Inc.; Covil Corporation; Crane Instrumentation & Sampling, Inc.; Crosby Valve, LLC; Daniel International Corporation; Davis Mechanical Contractors, Inc.; Dezurik, Inc.; Duke Energy Carolinas, LLC; Duke Energy Corporation; Eaton Corporation; Ellington Insulation Company, Inc.; Emerson Electric Co.; Fisher Controls International LLC; Flame Refractories, Inc.; Flowserve Corporation; Flowserve US Inc.; Fluor Constructors International; Fluor Constructors International, Inc.; Fluor Daniel Services Corporation; Fluor Enterprises, Inc.; FMC Corporation; Foster Wheeler Energy Corporation; Gardner Denver Nash, LLC; General Boiler Casing Company, Inc.; General Cable Corporation; General Cable Industries, Inc.; General Electric Company; Gould Electronics Inc.; Goulds Pumps, Incorporated; Goulds Pumps LLC; Great Barrier Insulation Co.; Grinnell LLC; Hajoca Corporation; Howden North America Inc.; HPC Industrial Services, LLC; IMO Industries Inc.; ITT LLC; Joy Global Underground Mining LLC; K-Mac Services Incorporated; Metropolitan Life Insurance Company; Mine Safety Appliances Company, LLC; MP Supply, Inc.; The Nash Engineering Company; Occidental Chemical Corporation; Paramount Global; Patterson Pump Company; PECW Holding Company; Pfizer Inc.; Piedmont Insulation, Inc.; Plastics Engineering Company; Presnell Insulation Co., Inc.; Redco Corporation; Riley Power Inc.; Rockwell Automation, Inc.; RSCC Wire & Cable LLC; Schneider Electric USA, Inc.; Sequoia Ventures Inc.; Spirax Sarco, Inc.; SPX

Corporation; Stafford Insulation Company; Standard Insulation Company Of N. C., Inc.; Starr Davis Company, Inc.; Starr Davis Company Of S.C., Inc.; Sterling Fluid Systems (USA) LLC; TE Wire & Cable LLC; Thermo Electric Company, Inc.; Union Carbide Corporation; Valves And Controls Us, Inc.; Velan Valve Corp.; Viking ump, Inc.; Vistra Intermediate Company LLC; The William Powell Company Wind Up, Ltd.; Yuba Heat Transfer LLC; Zurn Industries, LLC,

of which

Asbestos Corporation Limited, is the Appellant

and

Peter Protopapas, Duly Appointed Receiver for Asbestos Corporation Limited, is a Respondent.

PROOF OF SERVICE

I certify that a true copy of the Receiver for Asbestos Corporation Limited’s Return to Amici Curiae Certain Underwriters at Lloyd’s, London and Certain London Market Insurance Companies (“CLMI”) Motion for Leave to Participate in Oral Argument in this case has been served on the following, this 27th day of January 2025, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to subsection (g)(3) of the South Carolina Supreme Court’s March 20, 2020 Order, as amended May 29, 2020. Pursuant to subsection (g)(3) of the South Carolina Supreme Court’s Order, service on the attorneys admitted pro hac vice is accomplished by service on the associated South Carolina lawyer.

Counsel Served: **E-Mail**

Stephen L. Brown – sbrown@yclaw.com
Russell Grainger Hines – rhines@yclaw.com
James D. Gandy, III – tgandy@yclaw.com
Graydon V. Olive, IV – golive@yclaw.com
Clement Rivers, LLP

PO Box 993
Charleston, SC 29402

Attorneys for Appellant

Charles William Branham, III – tbranham@dobslegal.com
Todd Barnes – tbarnes@dobslegal.com
Ka’Leya Q. Hardin – khardin@dobslegal.com
Dean, Omar & Branham, LLP
302 N. Market Street
Suite 300
Dallas, TX 75202

Theile Branham McVey – tmcvey@kassellaw.com
Kassel McVey
PO Box 1476
Columbia, SC 29202-1476

Attorneys for Tibbs Respondents

Theodore Luke Manos – tlm@roblaw.net
Robertson Hollingsworth Manos & Rahn. LLC
40 Calhoun Street
Charleston, SC 29401

Attorney for Certain London Market Insurance Companies and Certain Underwriters at Lloyd’s, London

s/Shanon N. Peake
G. Murrell Smith, Jr. (S.C. Bar 66263)
Jonathan M. Robinson (S.C. Bar 68285)
Shanon N. Peake (S.C. Bar 102723)
Smith Robinson Holler DuBose and Morgan, LLC
3200 Devine Street
Columbia, South Carolina 29205

Attorneys for Receiver Peter D. Protopapas

January 27, 2025.