

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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May 16 2025

S.C. SUPREME COURT

Appeal from Richland County
Court of Common Pleas

Honorable Jean Hoefler Toal, Circuit Court Judge

Appellate Case No. 2023-001461
Circuit Court Case No. 2023-CP-40-01759

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.; Bahnsen, Inc.; Banner Industries International, Inc.; Banner Industries, LLC; Banner Industries Of N.E., Inc.; Barretts Minerals Inc.; Beaty 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 Pump, 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

Appellant.

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I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **BRIEF OF APPELLANT ASBESTOS CORPORATION LIMITED IN RESPONSE TO THE COURT'S MAY 8, 2025, LETTER** was served on all other parties to this appeal on May 16, 2025, via email (see attached) to their following counsel of record:

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Purported receiver for “insurance assets” of Asbestos Corporation Limited per Order being appealed

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

Respectfully submitted,
CLEMENT RIVERS, LLP

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May 16, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, May 16, 2025 1:01 PM
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Cc: Brown, Stephen L.; Olive, IV, Graydon; Hines, Russell; Justman, Aimee; Gandy, III, James D. (Tripp)
Subject: Tibbs v. Asbestos Corporation Limited; Appellate Case No. 2023-001461
Attachments: ACL - Response to South Carolina Supreme Court.pdf; Ex. A.pdf

Enclosed please find the Brief of Appellant Asbestos Corporation Limited in Response to the Court's May 8, 2025, Letter for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

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