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**Subject:** Appellate Case Nos. 2024-000916 , 2024-001423, 2024-002114 , 2024-002117, and 2025-000052  
**Date:** Tuesday, June 17, 2025 4:26:55 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[2025.06.17 Ltr Sup Ct re reply to mtn strike, 2.pdf](#)  
[Reply to Mtn for Sanctions, 2.pdf](#)  
[Exhibit A - Jan. 9, 2018 News Release, 1.pdf](#)  
[Exhibit B - June 10, 2025 letter, 2.pdf](#)  
[Exhibit C - June 2, 2025 letter, 2.pdf](#)  
[POS Reply to Mtn for Sanctions, 2.pdf](#)

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Please find attached for filing on behalf of the Receiver for Cape, Reply to the Motion for Sanctions, Proof of Service and correspondence from Jon Robinson in the above matters.

Thank you,  
Dot

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**Sent:** Monday, June 16, 2025 4:53 PM  
**To:** Supreme Court Filings <[suptctfilings@sccourts.org](mailto:suptctfilings@sccourts.org)>  
**Cc:** [kbell@robinsongray.com](#); [Teddy Manos](#) <[tlim@robaw.net](mailto:tlim@robaw.net)>; [khardin@dobslegal.com](#); [tbarnes@dobslegal.com](#); [tbranham@dobslegal.com](#); [Carroll, Todd](#) <[Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)>; [Theile McVey](#) <[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)>; [jchandler@rplegalgroup.com](#); [Shanon Peake](#) <[shanon.peake@smithrobinsonlaw.com](mailto:shanon.peake@smithrobinsonlaw.com)>; [Jon Robinson](#) <[jon.robinson@smithrobinsonlaw.com](mailto:jon.robinson@smithrobinsonlaw.com)>; [Murrell Smith](#) <[murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com)>; [sbrown@ycrlaw.com](#); [rhines@ycrlaw.com](#); [tgandy@ycrlaw.com](#); [golive@ycrlaw.com](#); [spugh@richardsonplowden.com](#); [bcarlton@richardsonplowden.com](#); [Carmen Ganjehsani](#) <[cganjehsani@richardsonplowden.com](mailto:cganjehsani@richardsonplowden.com)>; [asanzgiri@richardsonplowden.com](#); [Hall, Kevin](#) <[Kevin.Hall@wbd-us.com](mailto:Kevin.Hall@wbd-us.com)>; [O'Neill, Elizabeth](#) <[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)>; [jlay@gwblawfirm.com](#); [gculbreath@gwblawfirm.com](#); [ljoynner@gwblawfirm.com](#); [ljordan@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [john@bluesteinattorneys.com](#); [Peter Protopapas](#) <[pdp@rplegalgroup.com](mailto:pdp@rplegalgroup.com)>; [bb@rplegalgroup.com](#); [Will Blount](#) <[wblount@grsm.com](mailto:wblount@grsm.com)>; [Ian Conits](#) <[iconits@gwblawfirm.com](mailto:iconits@gwblawfirm.com)>; [farmer@conlaw.com](#); [Jones, Sarah](#) <[Sarah.Jones@wbd-us.com](mailto:Sarah.Jones@wbd-us.com)>; [James Elliott](#) <[jelliott@richardsonplowden.com](mailto:jelliott@richardsonplowden.com)>; [Cameron Berthelsen](#) <[cberthelsen@richardsonplowden.com](mailto:cberthelsen@richardsonplowden.com)>  
**Subject:** Charter Appellants' Return to Motion to Strike - Appellate Case Nos. 2024-000916 , 2024-001423, 2024-002114 , 2024-002117, and 2025-000052

Dear Madam Clerk,

Please find attached for filing on behalf of the Charter Defendants a return to the Receiver's motion to strike. By copy to all

counsel, we are serving them with a copy of this return. We appreciate the Court's consideration.

Respectfully submitted,

Vic

**A. VICTOR RAWL, JR.** | Partner

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**From:** Carroll, Todd <[Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)>

**Date:** Monday, June 16, 2025 at 2:05 PM

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**Cc:** [kbell@robinsongray.com](mailto:kbell@robinsongray.com) <[kbell@robinsongray.com](mailto:kbell@robinsongray.com)>, Teddy Manos <[tlm@roblaw.net](mailto:tlm@roblaw.net)>, [khardin@dobslegal.com](mailto:khardin@dobslegal.com) <[khardin@dobslegal.com](mailto:khardin@dobslegal.com)>, [tbarnes@dobslegal.com](mailto:tbarnes@dobslegal.com) <[tbarnes@dobslegal.com](mailto:tbarnes@dobslegal.com)>, [tbranham@dobslegal.com](mailto:tbranham@dobslegal.com) <[tbranham@dobslegal.com](mailto:tbranham@dobslegal.com)>, Theile McVey <[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)>, [jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com) <[jchandler@rplegalgroup.com](mailto:jchandler@rplegalgroup.com)>, [shanon.peake@smithrobinsonlaw.com](mailto:shanon.peake@smithrobinsonlaw.com) <[shanon.peake@smithrobinsonlaw.com](mailto:shanon.peake@smithrobinsonlaw.com)>, [jon@smithrobinsonlaw.com](mailto:jon@smithrobinsonlaw.com) <[jon@smithrobinsonlaw.com](mailto:jon@smithrobinsonlaw.com)>, [murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com) <[murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com)>, [sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com) <[sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com)>, [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com) <[rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)>, [tgandy@ycrlaw.com](mailto:tgandy@ycrlaw.com) <[tgandy@ycrlaw.com](mailto:tgandy@ycrlaw.com)>, [golive@ycrlaw.com](mailto:golive@ycrlaw.com) <[golive@ycrlaw.com](mailto:golive@ycrlaw.com)>, [spugh@richardsonplowden.com](mailto:spugh@richardsonplowden.com) <[spugh@richardsonplowden.com](mailto:spugh@richardsonplowden.com)>, [bcarlton@richardsonplowden.com](mailto:bcarlton@richardsonplowden.com) <[bcarlton@richardsonplowden.com](mailto:bcarlton@richardsonplowden.com)>, 'cganjehsani@richardsonplowden.com' <'cganjehsani@richardsonplowden.com'>, [asanzgiri@richardsonplowden.com](mailto:asanzgiri@richardsonplowden.com) <[asanzgiri@richardsonplowden.com](mailto:asanzgiri@richardsonplowden.com)>, Vic Rawl <[vrawl@grsm.com](mailto:vrawl@grsm.com)>, Hall, Kevin <[Kevin.Hall@wbd-us.com](mailto:Kevin.Hall@wbd-us.com)>, O'Neill, Elizabeth <[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)>, [jlay@gwblawfirm.com](mailto:jlay@gwblawfirm.com) <[jlay@gwblawfirm.com](mailto:jlay@gwblawfirm.com)>, [gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com) <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>, [ljoyner@gwblawfirm.com](mailto:ljoyner@gwblawfirm.com) <[ljoyner@gwblawfirm.com](mailto:ljoyner@gwblawfirm.com)>, [ljoan@gwblawfirm.com](mailto:ljoan@gwblawfirm.com) <[ljoan@gwblawfirm.com](mailto:ljoan@gwblawfirm.com)>, [ejones@gwblawfirm.com](mailto:ejones@gwblawfirm.com) <[ejones@gwblawfirm.com](mailto:ejones@gwblawfirm.com)>, [john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com) <[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)>, Peter Protopapas <[pdp@rplegalgroup.com](mailto:pdp@rplegalgroup.com)>, [bb@rplegalgroup.com](mailto:bb@rplegalgroup.com) <[bb@rplegalgroup.com](mailto:bb@rplegalgroup.com)>, Will Blount <[wblount@grsm.com](mailto:wblount@grsm.com)>, Ian Conits <[iconits@gwblawfirm.com](mailto:iconits@gwblawfirm.com)>, [farmer@conlaw.com](mailto:farmer@conlaw.com) <[farmer@conlaw.com](mailto:farmer@conlaw.com)>, Jones, Sarah <[Sarah.Jones@wbd-us.com](mailto:Sarah.Jones@wbd-us.com)>, James Elliott <[jelliott@richardsonplowden.com](mailto:jelliott@richardsonplowden.com)>, Cameron Berthelsen <[cberthelsen@richardsonplowden.com](mailto:cberthelsen@richardsonplowden.com)>

**Subject:** RE: Tibbs v. Asbestos Amended Order

Dear Madam Clerk,

Please find attached the following for filing on behalf of the Altrad Defendants: (1) a return to the Receiver's motion for sanctions, and (2) a return to the Receiver's motion to strike. By copy to all counsel, we are serving them with copies of each. We appreciate the Court's consideration of these, and please do not hesitate to call on us if we can provide any additional information or materials. Best regards,

Todd

**Todd Carroll**

Partner

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**Sent:** Friday, June 6, 2025 4:32 PM

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**Subject:** Tibbs v. Asbestos Amended Order

**Importance:** High

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**Ashli Thompson**  
**Senior Case Management Specialist**  
**Supreme Court of South Carolina**  
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