

From: Dot Faulkenberry
To: Supreme Court Filings
Cc: kbell@robinsongray.com; Vic Rawl; Teddy Manos; khardin@dobslegal.com; tbarnes@dobslegal.com; tbranham@dobslegal.com; Carroll, Todd; Theile McVey; jchandler@rplegalgroup.com; Shanon Peake; Jon Robinson; Murrell Smith; sbrown@ycrlaw.com; rhines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; spugh@richardsonplowden.com; bcarlton@richardsonplowden.com; Carmen Ganjeheh; asanzgiri@richardsonplowden.com; Hall, Kevin; O'Neill, Elizabeth; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljoynier@gwblawfirm.com; ljordan@gwblawfirm.com; ejones@gwblawfirm.com; john@bluesteinattorneys.com; Peter Protopapas; bb@rplegalgroup.com; Will Blount; Ian Conits; farmer@conlaw.com; Jones, Sarah; James Elliott; Cameron Berthelsen
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](#)

RECEIVED
Jun 17 2025
S.C. SUPREME COURT

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

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

SMITH ROBINSON
Forward thinking. Results driven.
Columbia
3200 Devine Street
Columbia, SC 29205
Camden: 803.432.1992
Sumter: 803.778.2471

Dot Faulkenberry

Paralegal

Office: [803.254.5445](tel:803.254.5445)

Direct: [803.704.1101](tel:803.704.1101)

Email: Dot.faulkenberry@smithrobinsonlaw.com

Follow us: [!\[\]\(d3102649f02e825ddb76dc3de0190154_img.jpg\)](#) [!\[\]\(55ca3a38dbb940110628e54e3ea7505d_img.jpg\)](#)

CONFIDENTIALITY NOTICE: The information transmitted, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer, intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

From: Vic Rawl <vrawl@grsm.com>
Sent: Monday, June 16, 2025 4:53 PM
To: Supreme Court Filings <suptctfilings@sccourts.org>
Cc: kbell@robinsongray.com; Teddy Manos <tlm@roblaw.net>; khardin@dobslegal.com; tbarnes@dobslegal.com; tbranham@dobslegal.com; Carroll, Todd <Todd.Carroll@wbd-us.com>; Theile McVey <tmcvey@kassellaw.com>; jchandler@rplegalgroup.com; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; Murrell Smith <murrell@smithrobinsonlaw.com>; sbrown@ycrlaw.com; rhines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; spugh@richardsonplowden.com; bcarlton@richardsonplowden.com; Carmen Ganjeheh <cganjeheh@richardsonplowden.com>; asanzgiri@richardsonplowden.com; Hall, Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljoynier@gwblawfirm.com; ljordan@gwblawfirm.com; ejones@gwblawfirm.com; john@bluesteinattorneys.com; Peter Protopapas <pdp@rplegalgroup.com>; bb@rplegalgroup.com; Will Blount <wblount@grsm.com>; Ian Conits <iconits@gwblawfirm.com>; farmer@conlaw.com; Jones, Sarah <Sarah.Jones@wbd-us.com>; James Elliott <jelliott@richardsonplowden.com>; Cameron Berthelsen <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

GORDON REES SCULLY MANSUKHANI | GRSM50
YOUR 50 STATE LAW FIRM™

677 King Street, Suite 450, Charleston, SC 29403
301 South 13th Street, Suite 400, Lincoln, NE 68508

D: 843-714-2501 | C: 803-463-4004 | vrawl@grsm.com

www.grsm.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

GRSM is a Mansfield Certified Firm.

From: Carroll, Todd <Todd.Carroll@wbd-us.com>

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

To: Supreme Court Filings <suptctfilings@sccourts.org>

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

Womble Bond Dickinson (US) LLP

d: [803-454-7730](tel:803-454-7730)

1221 Main Street

m: 803-446-2883
e: Todd.Carroll@wbd-us.com

Suite 1600
Columbia, SC 29201



womblebond Dickinson.com



This email is sent for and on behalf of Womble Bond Dickinson (US) LLP. Womble Bond Dickinson (US) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the 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 for further details.

From: Thompson, Ashli <athompson@sccourts.org>

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

To: kbell@robinsongray.com; Teddy Manos <t1m@roblaw.net>; khardin@dobslegal.com; tbarnes@dobslegal.com; tbranham@dobslegal.com; Theile McVey <tmcvey@kassellaw.com>; jchandler@rplegalgroup.com; shanon.peake@smithrobinsonlaw.com; jon@smithrobinsonlaw.com; murrell@smithrobinsonlaw.com; sbrown@ycrlaw.com; rhines@ycrlaw.com; tgandy@ycrlaw.com; golive@ycrlaw.com; spugh@richardsonplowden.com; bcarlton@richardsonplowden.com; 'cganjehsani@richardsonplowden.com'; asanzgiri@richardsonplowden.com; vrawl@grsm.com; Carroll, Todd <Todd.Carroll@wbd-us.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljoyner@gwblawfirm.com; ljordan@gwblawfirm.com; ejones@gwblawfirm.com; john@bluesteinattorneys.com; Peter Protopapas <pdp@rplegalgroup.com>; bb@rplegalgroup.com; wblount@grsm.com; Ian Conits <iconits@gwblawfirm.com>; farmer@conlaw.com

Subject: Tibbs v. Asbestos Amended Order

Importance: High

For your records.

Ashli Thompson
Senior Case Management Specialist
Supreme Court of South Carolina
(803) 734-1080

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

---

This email communication may contain CONFIDENTIAL INFORMATION WHICH ALSO MAY BE LEGALLY PRIVILEGED and is intended only for the use of the intended recipients identified above. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

**GORDON REES SCULLY MANSUKHANI, LLP**  
**YOUR 50 STATE LAW FIRM™**  
[www.grsm.com](http://www.grsm.com)

---

This email communication may contain CONFIDENTIAL INFORMATION WHICH ALSO MAY BE LEGALLY PRIVILEGED and is intended only for the use of the intended recipients identified above. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

**GORDON REES SCULLY MANSUKHANI, LLP**  
**YOUR 50 STATE LAW FIRM™**

[www.grsm.com](http://www.grsm.com)