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**Subject:** RE: motion for leave to supplement record in Appellate Case Nos. 2024-001423 and 2024-001499  
**Date:** Thursday, October 16, 2025 3:48:42 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Letter to the Supreme Court Correcting Typographical Error in Motion \(Appellate Case Nos. 2024-001423 and 2024-001499\).pdf](#)  
[Altrad Defendants" Corrected Motion for Leave to Supplement Sanctions Record \(Appellate Case Nos. 2024-001423 and 2024-001499\).pdf](#)

S.C. SUPREME COURT

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

Dear Madam Clerk,

Please find attached for filing a Corrected Motion for Leave to Supplement and a letter explaining the correction, which we are serving on all counsel via this email. This filing corrects the one that was transmitted with my email below. Thank you, and best regards,

Todd

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**From:** Carroll, Todd <Todd.Carroll@wbd-us.com>  
**Sent:** Thursday, October 2, 2025 2:18 PM  
**To:** Supreme Court Filings <supctfilings@sccourts.org>  
**Cc:** Murrell Smith <murrell@smithrobinsonlaw.com>; John T. Lay <jlay@gwblawfirm.com>; Jones, Sarah <Sarah.Jones@wbd-us.com>; Gray Culbreath <gculbreath@gwblawfirm.com>; Lindsay Joyner <ljoyner@gwblawfirm.com>; Eleanor Jones <ejones@gwblawfirm.com>; Jon Robinson <jon.robinson@smithrobinsonlaw.com>; Jon Robinson <jon@smithrobinsonlaw.com>; Shanon Peake <shanonp@smithrobinsonlaw.com>; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; Brown, Troy S. <troy.brown@morganlewis.com>; Dana Becker <dana.becker@morganlewis.com>; Edwards, Brady <brady.edwards@morganlewis.com>; 'Robert Jacques' <robert.jacques@morganlewis.com>; Scrudato, Paul A. <paul.scrudato@morganlewis.com>; Theile McVey <tmcvey@kassellaw.com>; John Kassel <jkassel@kassellaw.com>; Jamie Rutkoski <jrutkoski@kassellaw.com>; Trey Branham <trbranham@dobslegal.com>; 'kpaul@dobslegal.com' <kpaul@dobslegal.com>; dhumen@dobslegal.com; James Elliott <jelliott@richardsonplowden.com>; Cameron Berthelsen <cberthelsen@richardsonplowden.com>; Steve Pugh <spugh@richardsonplowden.com>; Ben Carlton <bcarlton@richardsonplowden.com>; 'cganjehsani@richardsonplowden.com' <cganjehsani@richardsonplowden.com>; Ashwin Sanzgiri <asanzgiri@richardsonplowden.com>; Vic Rawl <vrawl@grsm.com>; 'john@bluesteinattorneys.com' <john@bluesteinattorneys.com>; 'sbrown@ycrlaw.com' <sbrown@ycrlaw.com>; 'tgandy@ycrlaw.com' <tgandy@ycrlaw.com>; 'sgriffith@ycrlaw.com' <sgriffith@ycrlaw.com>; Hall,

Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>

**Subject:** motion for leave to supplement record in Appellate Case Nos. 2024-001423 and 2024-001499

Dear Madam Clerk,

Please find attached for filing with the Court a Motion for Leave to Supplement the Sanctions Record and an accompanying Third Supplemental Appendix for filing in Appellate Case Nos. 2024-001423 and 2024-001499. By copy to all counsel, we are serving them with the same via this email. We will submit the check for our filing fees within five days of this email.

As always, we appreciate the Court's consideration, and please let us know if we can provide any further materials or information. Additionally, we will file notice of this submission with the circuit court so that Judge Toal is aware of this filing as well. Best regards,

Todd

**Todd Carroll**

Partner

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