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Subject: RE: motion for leave to supplement record in Appellate Case Nos. 2024-001423 and 2024-001499
Date: Monday, October 20, 2025 9:53:45 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[Response to the Receiver"s Second Motion to Supplement Record \(Appellate Case Nos. 2024-001423 and 2024-001499\).pdf](#)
[CIHL v. Protopapas \[2025\] EWHC 2706 \(Ch\).pdf](#)

*** **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 the Altrad Defendants' Consent to the Receiver's Second Motion to Supplement the Record, along with a copy of a judgment issued today by the English High Court. By copy to all counsel, we are serving them with a copy of the same. If can provide the Court with any additional materials, please do not hesitate to call on us. Best,

Todd

From: Carroll, Todd
Sent: Monday, October 13, 2025 4:17 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 <trahan@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: RE: motion for leave to supplement record in Appellate Case Nos. 2024-001423 and 2024-001499

Dear Madam Clerk,

Please find attached for filing the Altrad Defendants' reply in support of their motion to supplement the record regarding the pending sanctions motion. By copy to all counsel, we are serving them with a copy of the same. We appreciate the Court's consideration, and best regards,

Todd

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>; Scudato, Paul A. <paul.scudato@morganlewis.com>; Theile McVey <tmcvey@kassellaw.com>; John Kassel <jkassel@kassellaw.com>; Jamie Rutkoski <jrutkoski@kassellaw.com>; Trey Branham <tbranham@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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