

Oct 29 2025

From: [Carroll, Todd](#)
To: [Elizabeth Moultrie](#); [Supreme Court Filings](#); [Theile McVey](#); [Trey Branham](#); [Teresa Gilliland](#); [Nancy Hinojosa](#)
Cc: [Hall, Kevin](#); [O'Neill, Elizabeth](#); [Murrell Smith](#); [troy.brown@morganlewis.com](#); [brady.edwards@morganlewis.com](#); [Scrudato, Paul A.](#); [John T. Lay, Jr.](#); [gculbreath@gwblawfirm.com](#); [Lindsay Joyner](#); [ejones@gwblawfirm.com](#); [Jon Robinson](#); ["shanon.peake@smithrobinsonlaw.com"](#); [jelliott@richardsonplowden.com](#); [cberthelsen@richardsonplowden.com](#); [S. Pugh](#); [bcarlton@richardsonplowden.com](#); [cganjehasani@richardsonplowden.com](#); [vrawl@grsm.com](#); [john@bluesteinattorneys.com](#); [Brown, Stephen L.](#); [James Gandy, III, Esquire](#) (tripp.gandy3239@gmail.com); sgriffith@vcrlaw.com
Subject: Re: Tibbs v. 3M Company, et al, and Cape PLC v. Anglo American PLC, et al., of whom Consolidated is Petitioner; Case No.: 2025-002121
Date: Wednesday, October 29, 2025 12:41:35 PM
Attachments: [image409937.png](#)
[image659105.png](#)
[image308554.png](#)
[image046517.png](#)

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

Dear Madam Clerk,

As with our earlier message, we intend to respond to this motion by noon tomorrow, if that suits the Court. Thank you,

Todd

Todd Carroll

Partner

Womble Bond Dickinson (US) LLP

d: 803-454-7730

m: 803-446-2883

e: Todd.Carroll@wbd-us.com

1221 Main Street

Suite 1600

Columbia, SC 29201



womblebonddickinson.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.womblebonddickinson.com/us/legal-notice for further details.

From: Elizabeth Moultrie <EMoultrie@kassellaw.com>

Sent: Wednesday, October 29, 2025 11:54:39 AM

To: Supreme Court Filings <supctfilings@sccourts.org>; Theile McVey <tmcvey@kassellaw.com>;

Trey Branham <tbranham@dobslegal.com>; Teresa Gilliland <tgilliland@dobslegal.com>; Nancy Hinojosa <nhinojosa@dobslegal.com>

Cc: Carroll, Todd <Todd.Carroll@wbd-us.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; Murrell Smith <murrell@smithrobinsonlaw.com>; troy.brown@morganlewis.com <troy.brown@morganlewis.com>; brady.edwards@morganlewis.com <brady.edwards@morganlewis.com>; Scrudato, Paul A. <paul.scrudato@morganlewis.com>; John T. Lay, Jr. <jlay@gwblawfirm.com>; gculbreath@gwblawfirm.com <gculbreath@gwblawfirm.com>; Lindsay Joyner <ljoyner@gwblawfirm.com>; ejones@gwblawfirm.com <ejones@gwblawfirm.com>; Jon Robinson <jon@smithrobinsonlaw.com>; 'shanon.peake@smithrobinsonlaw.com' <shanon.peake@smithrobinsonlaw.com>; jelliott@richardsonplowden.com <jelliott@richardsonplowden.com>; cberthelsen@richardsonplowden.com <cberthelsen@richardsonplowden.com>; S. Pugh <spugh@richardsonplowden.com>; bcarlton@richardsonplowden.com <bcarlton@richardsonplowden.com>; cganjehasani@richardsonplowden.com <cganjehasani@richardsonplowden.com>; vrawl@grsm.com <vrawl@grsm.com>; john@bluesteinattorneys.com <john@bluesteinattorneys.com>; Brown, Stephen L. <sbrown@ycrlaw.com>; James Gandy, III, Esquire (tripp.gandy3239@gmail.com) <tripp.gandy3239@gmail.com>; sgriffith@ycrlaw.com <sgriffith@ycrlaw.com>

Subject: RE: Tibbs v. 3M Company, et al, and Cape PLC v. Anglo American PLC, et al., of whom Consolidated is Petitioner; Case No.: 2025-002121

External (emoultrie@kassellaw.com)

[Report This Email](#) [FAQ](#)

Dear Sir or Madam:

Attached hereto for filing please find Plaintiffs Tibbs' Motion for Extension of Time to Respond to Petitioners' Petition for a Writ of Prohibition and a Writ of Certiorari in the above matter. I have also attached my Proof of Service for same. By copy of this email I am serving a copy of the attached on all parties.

Thank you for your kind consideration and assistance. A check for the filing fee will be hand-delivered to your office this afternoon.

Yours truly,
E.

Elizabeth Cason Moultrie

Senior Paralegal

KASSEL McVEY ATTORNEYS AT LAW

1330 Laurel Street

P O Box 1476

Columbia SC 29202-1476
803-256-4242
803-256-1952 (Facsimile)
803-312-5146 (Cell)
emoultrie@kassellaw.com

~~~ 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. All e-mail correspondence to and from this address may be subject to public disclosure under the South Carolina Freedom of Information Act (FOIA). This correspondence is intended exclusively for the individual or entity to which it is addressed and may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure