

RECEIVED

Oct 30 2025

From: [Vic Rawl](#)
To: [Supreme Court Filings](#)
Cc: [Shealy, Brenda](#); [Hall, Kevin](#); [O'Neill, Elizabeth](#); [spugh@richardsonplowden.com](#); [bcarlton@richardsonplowden.com](#); [cganjehsani@richardsonplowden.com](#); [asanzgiri@richardsonplowden.com](#); [sbrown@ycrlaw.com](#); [tgandy@ycrlaw.com](#); [sgriffith@ycrlaw.com](#); [murrell@smithrobinsonlaw.com](#); [jlay@gwblawfirm.com](#); [gcublbreath@gwblawfirm.com](#); [ljoynr@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [jon@smithrobinsonlaw.com](#); [shanon.peake@smithrobinsonlaw.com](#); ["john@bluesteinattorneys.com"](#); [Theile McVey](#); [jkassel@kassellaw.com](#); [jrutkoski@kassellaw.com](#); [tbranham@dobslegal.com](#); [kpaul@sgpblaw.com](#); [dchumen@yahoo.com](#); [jelliott@richardsonplowden.com](#); [cberthelsen@richardsonplowden.com](#); [Jones, Sarah](#); [Carroll, Todd](#); [Stacey Smith](#)
Subject: Re: Tibbs, et al. v. 3M Company (2025-002121) and Tibbs, et al. v. 3M Company (2025-002120)
Date: Thursday, October 30, 2025 1:58:09 PM
Attachments: [image001.png](#)
[image752351.png](#)
[image401209.png](#)
[image751410.png](#)
[image121304.png](#)
[10-30-2025 - CHARTER RESPONSE TO MOTION TO EXTEND BRIEFING DEADLINES.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 Charter Petitioners' response to Plaintiffs' motion to extend briefing deadlines that they filed yesterday in the above-referenced matters, which are pending before the Court in its original jurisdiction. By copy to all counsel, we are serving them with a copy of the same.

As always, we appreciate the Court's consideration of the attached.

Respectfully submitted,

Vic

A. VICTOR RAWL, JR.

Partner

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

D: 843.714.2501 | **M:** 803.463.4004

E: vrawl@grsm.com | grsm.com

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

GRSM is a Mansfield Certified Firm.

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

Date: Thursday, October 30, 2025 at 11:12 AM

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

Cc: Shealy, Brenda <BShealy@sccourts.org>, Hall, Kevin <Kevin.Hall@wbd-us.com>, O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.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>, sbrown@ycrlaw.com <sbrown@ycrlaw.com>, tgandy@ycrlaw.com <tgandy@ycrlaw.com>, sgriffith@ycrlaw.com <sgriffith@ycrlaw.com>, murrell@smithrobinsonlaw.com <murrell@smithrobinsonlaw.com>, jlay@gwblawfirm.com <jlay@gwblawfirm.com>, gculbreath@gwblawfirm.com <gculbreath@gwblawfirm.com>, ljoyner@gwblawfirm.com <ljoyner@gwblawfirm.com>, ejones@gwblawfirm.com <ejones@gwblawfirm.com>, jon@smithrobinsonlaw.com <jon@smithrobinsonlaw.com>, shanon.peake@smithrobinsonlaw.com <shanon.peake@smithrobinsonlaw.com>, Vic Rawl <vrawl@grsm.com>, 'john@bluesteinattorneys.com' <john@bluesteinattorneys.com>, Theile McVey <tmcvey@kassellaw.com>, jkassel@kassellaw.com <jkassel@kassellaw.com>, jrutkoski@kassellaw.com <jrutkoski@kassellaw.com>, tbranham@dobslegal.com <tbranham@dobslegal.com>, kpaul@sgpblaw.com <kpaul@sgpblaw.com>, dchumen@yahoo.com <dchumen@yahoo.com>, jelliott@richardsonplowden.com <jelliott@richardsonplowden.com>, cberthelsen@richardsonplowden.com <cberthelsen@richardsonplowden.com>, Vic Rawl <vrawl@grsm.com>, Jones, Sarah <Sarah.Jones@wbd-us.com>

Subject: RE: Tibbs, et al. v. 3M Company (2025-002121) and Tibbs, et al. v. 3M Company (2025-002120)

Dear Madam Clerk,

Please find attached for filing a short response to the motion to extend briefing deadlines that was filed yesterday in the above-referenced matters, which are pending before the Court in its original jurisdiction. Attached to this response are two exhibits: (1) a set of materials that have been recently filed with the circuit court, and (2) an opinion issued yesterday by the Bankruptcy Court for the Southern District of New York in *In re Asbestos Corporation Limited*. By copy to all counsel, we are serving them with a copy of the same.

As always, we appreciate the Court's consideration of the attached. Best regards,

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: Shealy, Brenda <BShealy@sccourts.org>

Sent: Wednesday, October 22, 2025 9:01 AM

To: Carroll, Todd <Todd.Carroll@wbd-us.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; spugh@richardsonplowden.com; bcarlton@richardsonplowden.com; cganjehsani@richardsonplowden.com; asanzgiri@richardsonplowden.com; sbrown@ycrlaw.com; tgandy@ycrlaw.com; sgriffith@ycrlaw.com; murrell@smithrobinsonlaw.com; jlay@gwblawfirm.com; gcultbreath@gwblawfirm.com; ljoyner@gwblawfirm.com; ejones@gwblawfirm.com; jon@smithrobinsonlaw.com; shanon.peake@smithrobinsonlaw.com; vrawl@grsm.com; Theile McVey <tmcvey@kassellaw.com>; jkassel@kassellaw.com; jrutkoski@kassellaw.com; tbranham@dobslegal.com; kpaul@sgpblaw.com; dchumen@yahoo.com; jelliott@richardsonplowden.com; cberthelsen@richardsonplowden.com

Subject: Tibbs, et al. v. 3M Company (2025-002121) and Tibbs, et al. v. 3M Company (2025-002120)

External (bshealy@sccourts.org)

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

Dear Counsel:

We have assigned 2025-002121 to the case in which Charter Consolidated, et al., at the petitioners. Case No. 2025-002120 has been assigned to the case in which Mohen Altrad, et al., are the petitioners.

Please be advised that any returns to be filed in the above cases should be served and filed no later than 10 days from today's date.

Thank you,



Brenda F. Shealy

Chief Deputy Clerk

Supreme Court of South Carolina

P. O. Box 11330

Columbia, SC 29211

Office: (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)