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Subject: RE: Tibbs, et al. v. 3M Company (2025-002121) and Tibbs, et al. v. 3M Company (2025-002120)
Date: Friday, October 31, 2025 6:31:00 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Addendum to Petitions for Extraordinary Writs \(Appellate Case Nos. 2024-001423, 2024-001499, 2025-002120, and 2025-002121\).pdf](#)
[Attachment A--Order Vacating October 13, 2025 Appointment Order in Park \(Oct. 30, 2025\).pdf](#)
[Attachment B--Order Granting Sealed Settlement in Park and Tibbs \(Oct. 30, 2025\).PDF](#)
[Attachment C--Supreme Court Message Setting Reply Briefs Due on November 12, 2025.pdf](#)
[Attachment D--Notice of Hearing with the Circuit Court for November 12, 2025.PDF](#)

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Dear Madam Clerk,

Consistent with the Petitioners' commitment to keeping the Court informed of the status of proceedings below, please find attached for filing a Joint Addendum to the Petitions pending before the Court in its original jurisdiction, which we are submitting with Mr. Rawl's permission as well, along with a series of attachments:

1. An order of the circuit court in *Park* vacating the circuit court's October 13, 2025 Order in *Park* (Oct. 30, 2025).
2. An order of the circuit court granting the putative Receiver's motion to approve a confidential settlement agreement (Oct. 30, 2025).
3. A copy of this Court's email confirming that briefing on the Petitions will close on November 12, 2025 (Oct. 30, 2025).
4. An order of the circuit court stating that it will conclude the trial on the putative Receiver's claims in *Tibbs* on November 12, 2025 (Oct. 31, 2025).

By copy to all counsel, we are serving them with a copy of the same. As before, we appreciate the Court's consideration of these materials. Best,

Todd

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

Sent: Thursday, October 30, 2025 12:10 PM

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; bcarlton@richardsonplowden.com; cganjehsani@richardsonplowden.com; asanzgiri@richardsonplowden.com; sbrown@ycrlaw.com; tgandy@ycrlaw.com; sgriffith@ycrlaw.com; murrell@smithrobinsonlaw.com; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljoyner@gwblawfirm.com; ejones@gwblawfirm.com; jon@smithrobinsonlaw.com; shanon.peake@smithrobinsonlaw.com; vrawl@grsm.com; 'john@bluesteinattorneys.com' <john@bluesteinattorneys.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; 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

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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; gculbreath@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)

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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**



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