

RECEIVED

Nov 07 2025

S.C. SUPREME COURT

From: [Carroll, Todd](#)
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](#); [gculbreath@gwblawfirm.com](#); [ljoyner@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [jon@smithrobinsonlaw.com](#); [shanon.peake@smithrobinsonlaw.com](#); [vrawl@grsm.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](#); [Vic Rawl](#); [Jones, Sarah](#)
Subject: RE: Tibbs, et al. v. 3M Company (2025-002121) and Tibbs, et al. v. 3M Company (2025-002120)
Date: Friday, November 7, 2025 5:11:46 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Response in Opposition to Motion to Strike.pdf](#)
[Attachment--Operating Agreement for the CIHL Qualified Settlement Fund.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 Petitioners' Response to the Motion to Strike that was filed on Monday, November 3rd, along with an attachment—the purported “Operating Agreement” for the Cape Intermediate Holdings Limited settlement fund. By copy to all counsel, we are serving them with a copy of the same. Have a good weekend, and best regards,

Todd

From: Carroll, Todd
Sent: Friday, October 31, 2025 6:28 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,

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 <suptfilings@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; jculbreath@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

Womble Bond Dickinson (US) LLP

d: [803-454-7730](tel:803-454-7730)

m: [803-446-2883](tel: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; 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)

[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.