

Nov 07 2025

S.C. SUPREME COURT

**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](#); [gculbreath@gwblawfirm.com](#); [ljoynes@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@sgblaw.com](#); [dchumen@yahoo.com](#); [jelliott@richardsonplowden.com](#); [cberthelsen@richardsonplowden.com](#); [Jones, Sarah](#); [Carroll, Todd](#)  
**Subject:** Re: Tibbs, et al. v. 3M Company (2025-002121) and Tibbs, et al. v. 3M Company (2025-002120)  
**Date:** Friday, November 7, 2025 6:16:04 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Charter Response in Opposition to the Receiver's Motion to Strike.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 Charter Petitioners' Response to the Motion to Strike that was filed on Monday, November 3rd. By copy to all counsel, we are serving them with a copy of the same.

Respectfully submitted,

Vlc

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**A. VICTOR RAWL, JR.**

Partner

**GORDON REES SCULLY MANSUKHANI**

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

**Date:** Friday, November 7, 2025 at 4:10 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 <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

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**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 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

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**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

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**From:** Carroll, Todd <[Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)>  
**Sent:** Thursday, October 30, 2025 12:10 PM  
**To:** Supreme Court Filings <[supctfilings@sccourts.org](mailto:supctfilings@sccourts.org)>  
**Cc:** Shealy, Brenda <[BShealy@sccourts.org](mailto:BShealy@sccourts.org)>; Hall, Kevin <[Kevin.Hall@wbd-us.com](mailto:Kevin.Hall@wbd-us.com)>; O'Neill, Elizabeth <[Elizabeth.ONeill@wbd-us.com](mailto:Elizabeth.ONeill@wbd-us.com)>; [spugh@richardsonplowden.com](mailto:spugh@richardsonplowden.com); [bcarlton@richardsonplowden.com](mailto:bcarlton@richardsonplowden.com); [cganjehsani@richardsonplowden.com](mailto:cganjehsani@richardsonplowden.com); [asanzgiri@richardsonplowden.com](mailto:asanzgiri@richardsonplowden.com); [sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com); [tgandy@ycrlaw.com](mailto:tgandy@ycrlaw.com); [sgriffith@ycrlaw.com](mailto:sgriffith@ycrlaw.com); [murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com); [jlay@gwblawfirm.com](mailto:jlay@gwblawfirm.com); [gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com); [ljoyner@gwblawfirm.com](mailto:ljoyner@gwblawfirm.com); [ejones@gwblawfirm.com](mailto:ejones@gwblawfirm.com); [jon@smithrobinsonlaw.com](mailto:jon@smithrobinsonlaw.com); [shanon.peake@smithrobinsonlaw.com](mailto:shanon.peake@smithrobinsonlaw.com); [vrawl@grsm.com](mailto:vrawl@grsm.com); 'john@bluesteinattorneys.com' <[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)>; Theile McVey <[tmcvey@kassellaw.com](mailto:tmcvey@kassellaw.com)>; [jkassel@kassellaw.com](mailto:jkassel@kassellaw.com); [jrutkoski@kassellaw.com](mailto:jrutkoski@kassellaw.com); [tbranham@dobslegal.com](mailto:tbranham@dobslegal.com); [kpaul@sgpblaw.com](mailto:kpaul@sgpblaw.com); [dchumen@yahoo.com](mailto:dchumen@yahoo.com); [jelliott@richardsonplowden.com](mailto:jelliott@richardsonplowden.com); [cberthelsen@richardsonplowden.com](mailto:cberthelsen@richardsonplowden.com); Vic Rawl <[vrawl@grsm.com](mailto:vrawl@grsm.com)>; Jones, Sarah <[Sarah.Jones@wbd-us.com](mailto: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

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**From:** Shealy, Brenda <[BShealy@sccourts.org](mailto:BShealy@sccourts.org)>

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

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

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

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**

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