

From: [Vic Rawl](#)
To: [Court Of Appeals Filings](#)
Cc: [Murrell Smith](#); [Theile McVey](#); [John T. Lay](#); [Spencer, Shelby](#); [Jones, Sarah](#); [WBD.SCASBESTOS](#); [Stacey Smith](#); [Rachel Pruzin](#); [dot@smithrobinsonlaw.com](#); [dot.faulkenberry@smithrobinsonlaw.com](#); [kedrington@gwblawfirm.com](#); [ecruz@gwblawfirm.com](#); [vbuckley@gwblawfirm.com](#); [dana.becker@morganlewis.com](#); [brady.edwards@morganlewis.com](#); [Staley, Denesha](#); [Hall, Kevin](#); [O'Neill, Elizabeth](#); [Will Blount](#); [jon@smithrobinsonlaw.com](#); [shanon.peake@smithrobinsonlaw.com](#); [gculbreath@gwblawfirm.com](#); [jjoyner@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [troy.brown@morganlewis.com](#); [lauren.semlinger@morganlewis.com](#); [paul.scrudato@morganlewis.com](#); ["Robert Jacques"](#); [John Kassel](#); [Jamie Rutkoski](#); [Trey Branham](#); ["kpaul@dobslegal.com"](#); [David Humen](#); [James Elliott](#); [Cameron Berthelsen](#); [Steve Pugh](#); [Ben Carlton](#); [Carmen Ganjehsani](#); [Ashwin Sanzgiri](#); ["john@bluesteinattorneys.com"](#); ["sbrown@ycrlaw.com"](#); ["tgandy@ycrlaw.com"](#); ["sgriffith@ycrlaw.com"](#); [Carroll, Todd](#)
Subject: Re: John A. Tibbs v. Asbestos Corporation Limited (15) 2025-002104
Date: Monday, November 17, 2025 6:18:31 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Charter Appellants" Response to the Putative Receiver"s Motion to Strike \(Appellate Case No. 2025-002104\).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 Defendants' response to the putative Receiver's motion to strike. By copy to all counsel, we are serving them with a copy of the same.

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: Monday, November 17, 2025 at 6:44 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Murrell Smith <murrell@smithrobinsonlaw.com>, Theile McVey <tmcvey@kassellaw.com>, John T. Lay <jlay@gwblawfirm.com>, Spencer, Shelby <sspencer@sccourts.org>, Jones, Sarah <Sarah.Jones@wbd-us.com>, WBD.SCASBESTOS <WBD.SCASBESTOS@wbd-us.com>, Stacey Smith <sasmith@grsm.com>, Rachel Pruzin <rpruzin@grsm.com>, dot@smithrobinsonlaw.com <dot@smithrobinsonlaw.com>, dot.faulkenberry@smithrobinsonlaw.com <dot.faulkenberry@smithrobinsonlaw.com>, kedrington@gwblawfirm.com

<kedrington@gwblawfirm.com>, ecruz@gwblawfirm.com <ecruz@gwblawfirm.com>, vbuckley@gwblawfirm.com <vbuckley@gwblawfirm.com>, dana.becker@morganlewis.com <dana.becker@morganlewis.com>, brady.edwards@morganlewis.com <brady.edwards@morganlewis.com>, Staley, Denesha <dstaley@sccourts.org>, Hall, Kevin <Kevin.Hall@wbd-us.com>, O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>, Vic Rawl <vrawl@grsm.com>, Will Blount <wblount@grsm.com>, jon@smithrobinsonlaw.com <jon@smithrobinsonlaw.com>, shanon.peake@smithrobinsonlaw.com <shanon.peake@smithrobinsonlaw.com>, gculbreath@gwblawfirm.com <gculbreath@gwblawfirm.com>, ljoyner@gwblawfirm.com <ljoyner@gwblawfirm.com>, ejones@gwblawfirm.com <ejones@gwblawfirm.com>, troy.brown@morganlewis.com <troy.brown@morganlewis.com>, lauren.semlinger@morganlewis.com <lauren.semlinger@morganlewis.com>, paul.scrudato@morganlewis.com <paul.scrudato@morganlewis.com>, 'Robert Jacques' <robert.jacques@morganlewis.com>, John Kassel <jkassel@kassellaw.com>, Jamie Rutkoski <jrutkoski@kassellaw.com>, Trey Branham <tbranham@dobslegal.com>, 'kpaul@dobslegal.com' <kpaul@dobslegal.com>, David Humen <dhumen@dobslegal.com>, James Elliott <jelliott@richardsonplowden.com>, Cameron Berthelsen <cberthelsen@richardsonplowden.com>, Steve Pugh <spugh@richardsonplowden.com>, Ben Carlton <bcarlton@richardsonplowden.com>, Carmen Ganjehsani <cganjehsani@richardsonplowden.com>, Ashwin Sanzgeri <asanzgeri@richardsonplowden.com>, Vic Rawl <vrawl@grsm.com>, 'john@bluesteinattorneys.com' <john@bluesteinattorneys.com>, 'sbrown@ycrlaw.com' <sbrown@ycrlaw.com>, 'tgandy@ycrlaw.com' <tgandy@ycrlaw.com>, 'sgriffith@ycrlaw.com' <sgriffith@ycrlaw.com>, Jones, Sarah <Sarah.Jones@wbd-us.com>

Subject: RE: John A. Tibbs v. Asbestos Corporation Limited (15) 2025-002104

Dear Madam Clerk,

Please find attached for filing two documents: (1) the Altrad Defendants' response to the putative Receiver's motion to strike public records; and (2) a response to the putative Receiver's request to suspend his briefing deadline. By copy to all counsel, we are serving them with a copy of the same. Best,

Todd

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

Sent: Tuesday, November 4, 2025 4:39 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Murrell Smith <murrell@smithrobinsonlaw.com>; Theile McVey <tmcvey@kassellaw.com>; John T. Lay <jlay@gwblawfirm.com>; Spencer, Shelby <sspencer@sccourts.org>; Jones, Sarah <Sarah.Jones@wbd-us.com>; WBD.SCASBESTOS <WBD.SCASBESTOS@wbd-us.com>;

sasmith@grsm.com; rpruzin@grsm.com; dot@smithrobinsonlaw.com;
dot.faulkenberry@smithrobinsonlaw.com; kedrington@gwblawfirm.com; ecruz@gwblawfirm.com;
vbuckley@gwblawfirm.com; dana.becker@morganlewis.com; brady.edwards@morganlewis.com;
Staley, Denesha <dstaley@sccourts.org>; Hall, Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth
<Elizabeth.ONeill@wbd-us.com>; vrawl@grsm.com; wblount@grsm.com;
jon@smithrobinsonlaw.com; shanon.peake@smithrobinsonlaw.com; gculbreath@gwblawfirm.com;
ljoyner@gwblawfirm.com; ejones@gwblawfirm.com; troy.brown@morganlewis.com;
lauren.semlinger@morganlewis.com; paul.scrudato@morganlewis.com; 'Robert Jacques'
<robert.jacques@morganlewis.com>; John Kassel <jkassel@kassellaw.com>; Jamie Rutkoski
<jrutkoski@kassellaw.com>; Trey Branham <tbranham@dobslegal.com>; 'kpaul@dobslegal.com'
<kpaul@dobslegal.com>; David Humen <dhumen@dobslegal.com>; James Elliott
<jelliott@richardsonplowden.com>; Cameron Berthelsen <cberthelsen@richardsonplowden.com>;
Steve Pugh <spugh@richardsonplowden.com>; Ben Carlton <bcarlton@richardsonplowden.com>;
Carmen Ganjehsani <cganjehsani@richardsonplowden.com>; Ashwin Sanzgiri
<asanzgiri@richardsonplowden.com>; Vic Rawl <vrawl@grsm.com>; 'john@bluesteinattorneys.com'
<john@bluesteinattorneys.com>; 'sbrown@ycrlaw.com' <sbrown@ycrlaw.com>;
'tgandy@ycrlaw.com' <tgandy@ycrlaw.com>; 'sgriffith@ycrlaw.com' <sgriffith@ycrlaw.com>; Jones,
Sarah <Sarah.Jones@wbd-us.com>

Subject: RE: John A. Tibbs v. Asbestos Corporation Limited (15) 2025-002104

Dear Madam Clerk,

Please find attached for filing with the Court the Altrad Appellants' petition for rehearing of the order dismissing this appeal, along with two attachments accompanying the petition. By copy to all counsel, we are serving them with a copy of the same. We will submit the filing fee within five days of this correspondence. As always, we appreciate the Court's consideration of the attached. Best,

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



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: Staley, Denesha <dstaley@sccourts.org>

Sent: Monday, October 20, 2025 1:19 PM

To: Carroll, Todd <Todd.Carroll@wbd-us.com>; Hall, Kevin <Kevin.Hall@wbd-us.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-us.com>; vrawl@grsm.com; wblount@grsm.com; jon@smithrobinsonlaw.com; shanon.peake@smithrobinsonlaw.com; jlay@gwblawfirm.com; gculbreath@gwblawfirm.com; ljoyner@gwblawfirm.com; ejones@gwblawfirm.com; troy.brown@morganlewis.com; lauren.semmlinger@morganlewis.com; paul.scrudato@morganlewis.com

Cc: Spencer, Shelby <sspencer@sccourts.org>; Jones, Sarah <Sarah.Jones@wbd-us.com>; WBD.SCASBESTOS <WBD.SCASBESTOS@wbd-us.com>; sasmith@grsm.com; rpruzin@grsm.com; dot@smithrobinsonlaw.com; dot.faulkenberry@smithrobinsonlaw.com; kedrington@gwblawfirm.com; ecruz@gwblawfirm.com; vbuckley@gwblawfirm.com; dana.becker@morganlewis.com; brady.edwards@morganlewis.com

Subject: John A. Tibbs v. Asbestos Corporation Limited (15) 2025-002104

External (dstaley@sccourts.org)

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

Good afternoon,

Attached please find correspondence from the South Carolina Court of Appeals.

PLEASE DO NOT RESPOND TO THIS EMAIL.

Send **ALL** correspondence to ctappfilings@sccourts.org **only**. Any parties not included in this email will receive the attached correspondence via US Mail.



Denesha M. Staley
Senior Appeals Specialist
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
Filings: ctappfilings@sccourts.org
Phone: (803) 734-1890

~~~ 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)