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**Subject:** Tibbs, et al. v. 3M Company (2025-002104)  
**Date:** Wednesday, December 10, 2025 4:51:58 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Altrad Appellants" Opening Brief \(Appellate Case No. 2025-002104\).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 Altrad Appellants' Opening Brief, which we are serving on all counsel through this email. Additionally, we are presently uploading Volumes I through X of the Record on Appeal into my OneDrive folder for filing with the Court. Those record volumes are available to counsel and to the Court as well through this link, and we are serving counsel with the Record via this email: <https://download.wbd-us.com/bds/Login.do?id=A06131299718&p1=naj1213sbhcecdkicjlcffijj20>

As instructed in the Court's November 26th Order, we will supply the Court with bound copies of these materials no later than January 6, 2026. Finally, please allow this email to serve as notice that our clients are joining in the arguments presented by Mr. Rawl's clients in their brief pursuant to Rule 208(b)(6), SCACR.

We appreciate the Court's consideration of these materials. Please let us know if you have trouble accessing any of them, and we will gladly make provision to supply them another way. Have a good afternoon,

Todd

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**From:** Carroll, Todd <Todd.Carroll@wbd-us.com>  
**Sent:** Wednesday, November 12, 2025 4:54 PM  
**To:** Supreme Court Filings <supctfilings@sccourts.org>  
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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 with the Court a reply in support of the Altrad Petitioners' Petition for Extraordinary Writs, along with an accompanying timeline. By copy to opposing counsel, we are serving them with copies of the same. We appreciate the Court's consideration of this filing, and best regards,

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)>

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

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

External ([bshealy@sccourts.org](mailto: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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