

Dec 10 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](#); [gcublbreath@gwblawfirm.com](#); [ljoyner@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@sgpblaw.com](#); [dchumen@yahoo.com](#); [jelliott@richardsonplowden.com](#); [cberthelsen@richardsonplowden.com](#); [Jones, Sarah](#); [Stacey Smith](#); [Carroll, Todd](#)
Subject: Tibbs, et al. v. 3M Company (2025-002104) - Revised Brief of Charter Appellants
Date: Wednesday, December 10, 2025 11:44:56 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[12.10.2025 Charter Appellants" Revised Final Brief\[92\].pdf](#)

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Madam Clerk,

We discovered a minor error in the table of authorities in the brief filed 45 minutes ago (referenced below in this e-mail chain). The error has been corrected in the Charter Appellants revised brief that is attached hereto for filing. Please substitute the attached for the initial brief filed by Charter Appellants. We are serving on all counsel through this email.

Respectfully submitted,

Vic

A. VICTOR RAWL, JR.

Partner

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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From: Vic Rawl <vrawl@grsm.com>

Date: Wednesday, December 10, 2025 at 9:47 PM

To: Supreme Court Filings <suptctfilings@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
<murrell@smithrobinsonlaw.com>, jlay@gwblawfirm.com <jlay@gwblawfirm.com>,
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<ljoyner@gwblawfirm.com>, ejones@gwblawfirm.com <ejones@gwblawfirm.com>,
jon@smithrobinsonlaw.com <jon@smithrobinsonlaw.com>,
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'john@bluesteinattorneys.com' <john@bluesteinattorneys.com>, Theile McVey
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<tbranham@dobslegal.com>, kpaul@sgpblaw.com <kpaul@sgpblaw.com>,
dchumen@yahoo.com <dchumen@yahoo.com>, jelliott@richardsonplowden.com
<jelliott@richardsonplowden.com>, cberthelsen@richardsonplowden.com
<cberthelsen@richardsonplowden.com>, Jones, Sarah <Sarah.Jones@wbd-us.com>,
Stacey Smith <sasmith@grsm.com>, Carroll, Todd <Todd.Carroll@wbd-us.com>
Subject: Tibbs, et al. v. 3M Company (2025-002104)

Dear Madam Clerk,

Please find attached for filing the Charter Appellants' Opening Brief, which we are serving on all counsel through this email. As indicated below, Mr. Carroll is uploading Volumes I through X of the Record on Appeal.

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. Carroll's clients in their brief pursuant to Rule 208(b)(6), SCACR.

We appreciate the Court's consideration of these materials.

Respectfully submitted,

Vic

A. VICTOR RAWL, JR.

Partner

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

Date: Wednesday, December 10, 2025 at 3:49 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 <murrell@smithrobinsonlaw.com>, jlay@gwblawfirm.com <jlay@gwblawfirm.com>, gculbreath@gwblawfirm.com <gculbreath@gwblawfirm.com>, ljoyner@gwblawfirm.com <ljoyner@gwblawfirm.com>, ejones@gwblawfirm.com <ejones@gwblawfirm.com>, jon@smithrobinsonlaw.com <jon@smithrobinsonlaw.com>, shanon.peake@smithrobinsonlaw.com <shanon.peake@smithrobinsonlaw.com>, Vic Rawl <vrawl@grsm.com>, 'john@bluesteinattorneys.com' <john@bluesteinattorneys.com>, Theile McVey <tmcvey@kassellaw.com>, jkassel@kassellaw.com <jkassel@kassellaw.com>, jrutkoski@kassellaw.com <jrutkoski@kassellaw.com>, tbranham@dobslegal.com <tbranham@dobslegal.com>, kpaul@sgpblaw.com <kpaul@sgpblaw.com>, dchumen@yahoo.com <dchumen@yahoo.com>, jelliott@richardsonplowden.com <jelliott@richardsonplowden.com>, cberthelsen@richardsonplowden.com <cberthelsen@richardsonplowden.com>, Vic Rawl <vrawl@grsm.com>, Jones, Sarah <Sarah.Jones@wbd-us.com>
Subject: Tibbs, et al. v. 3M Company (2025-002104)

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=naj1213sbheecdkkicjlceffijj20>

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

From: Carroll, Todd <Todd.Carroll@wbd-us.com>
Sent: Wednesday, November 12, 2025 4:54 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; 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 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

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 <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 <murrell@smithrobinsonlaw.com>; jlay@gwblawfirm.com <jlay@gwblawfirm.com>; gculbreath@gwblawfirm.com <gculbreath@gwblawfirm.com>; ljoyner@gwblawfirm.com <ljoyner@gwblawfirm.com>;

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cberthelsen@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

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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

Office: (803) 734-1080

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