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**Subject:** Tibbs, et al. v. 3M Company et al (App Case No. 2025-002104)  
**Date:** Tuesday, December 30, 2025 4:57:15 PM  
**Attachments:** [2025.12.30 Respondent's Brief App Case No. 2025-2104.pdf](#)  
[2025.12.30 Respondent's Designation of Matter.pdf](#)  
[2025.12.30 POS - Respondent's Brief and Designation of Matter.pdf](#)

S.C. SUPREME COURT

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Dear Madam Clerk,

In accordance with the Court's November 26, 2025 Order, please find attached for filing the Respondent Cape PLC, individually and as successor in interest to Cape Asbestos Company Limited, n/k/a Cape Intermediate Holdings Ltd. by and through its duly appointed Receiver Peter D. Protopapas's Brief and Designation of Matter to be included in the Record on Appeal, along with the Proof of Service for the same.

By copy of this email, I am serving counsel of record contemporaneously with these documents.

Please let us know if you have trouble accessing any of these documents, and we will submit them a different way.

Thank you for the Court's consideration of these documents, and Happy New Year.

Sincerely,  
Lindsay



**Lindsay Anne Joyner**  
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