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Feb 19 2026

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Subject: RE: Tibbs, et al. v. 3M Company (2025-002104)
Date: Thursday, February 19, 2026 5:04:30 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Appellants' Joint Response to the Downstream Defendants Amici 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 on behalf of both the Altrad Appellants and the Charter Appellants a joint response to the "Downstream Defendants" brief. By copy to all counsel, we are serving them with the same. As always, we appreciate the Court's consideration of the attached.

Todd

From: Carroll, Todd
Sent: Tuesday, February 17, 2026 9:51 PM
To: 'Supreme Court Filings' <supctfilings@sccourts.org>
Cc: '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>; 'vrawl@grsm.com' <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>; 'vrawl@grsm.com' <vrawl@grsm.com>; Jones, Sarah <Sarah.Jones@wbd-us.com>; '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@yrcrlaw.com' <sbrown@yrcrlaw.com>;
'tgandy@yrcrlaw.com' <tgandy@yrcrlaw.com>; 'sgriffith@yrcrlaw.com' <sgriffith@yrcrlaw.com>; 'James
Ledlie' <jledlie@motleyrice.com>; 'Kush Shukla' <kush@mwinjurylaw.com>; 'jcagle@mrhfmlaw.com'
<jcagle@mrhfmlaw.com>; 'Kenneth J. Wilson' <kwilson@rpwb.com>; 'jennamcgee@parkerpoe.com'
<jennamcgee@parkerpoe.com>; 'wsawyer@murphygrantland.com'
<wsawyer@murphygrantland.com>; 'Thomas A. Limehouse, Jr.' <thomas@limeouselaw.com>; Will
Lewis <will@richardsonthomas.com>; Beattie B. Ashmore, P.A. <beattie@beattieashmore.com>;
'terry@richardsonthomas.com' <terry@richardsonthomas.com>
Subject: RE: Tibbs, et al. v. 3M Company (2025-002104)

Dear Madam Clerk,

Please find attached for filing the Altrad Appellants' response to the New Indy brief. By copy to all counsel, we are serving them with the same. As always, we appreciate the Court's consideration of the attached. Best,

Todd

From: Carroll, Todd

Sent: Monday, February 9, 2026 4:18 PM

To: 'Supreme Court Filings' <supctfilings@sccourts.org>

Cc: '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>; 'vrawl@grsm.com' <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>; 'vrawl@grsm.com' <vrawl@grsm.com>; Jones, Sarah <Sarah.Jones@wbd-us.com>; '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@yrcrlaw.com' <sbrown@yrcrlaw.com>; 'tgandy@yrcrlaw.com' <tgandy@yrcrlaw.com>; 'sgriffith@yrcrlaw.com' <sgriffith@yrcrlaw.com>; James Ledlie <jledlie@motleyrice.com>; Kush Shukla <kush@mwinjurylaw.com>; jcagle@mrhfmlaw.com; Kenneth J. Wilson <kwilson@rpwb.com>; jennamcgee@parkerpoe.com;

'wsawyer@murphygrantland.com' <wsawyer@murphygrantland.com>; Thomas A. Limehouse, Jr. <thomas@limeouselaw.com>

Subject: RE: Tibbs, et al. v. 3M Company (2025-002104)

Dear Madam Clerk,

Please find attached for filing the Altrad Appellants' response to the Plaintiffs' Law Firms' amicus brief. By copy to all counsel, we are serving them with the same. We appreciate the Court's consideration of the attached. Best regards,

Todd

From: Carroll, Todd

Sent: Tuesday, January 6, 2026 3:10 PM

To: 'Supreme Court Filings' <supctfilings@sccourts.org>

Cc: '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>; 'vrawl@grsm.com' <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>; 'vrawl@grsm.com' <vrawl@grsm.com>; Jones, Sarah <Sarah.Jones@wbd-us.com>; '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>

Subject: RE: Tibbs, et al. v. 3M Company (2025-002104)

Dear Madam Clerk,

Please find attached for filing with the Court the Altrad Appellants' Reply Brief, which we are serving on counsel via this email. Bound copies of this brief will be delivered to the Court later this afternoon directly from our vendor.

As before, please allow this email to serve as notice that our clients are joining in the arguments presented by Mr. Rawl's clients in their reply brief pursuant to Rule 208(b)(6), SCACR.

Finally, we very much appreciate the Court's accommodation regarding the hard copies of the Record on Appeal and have assurances from our vendor that those will be timely printed and delivered. Thank you!

If we can provide the Court with any additional materials or information, please do not hesitate to call on us. Best regards,

Todd

From: Carroll, Todd

Sent: Monday, January 5, 2026 5:25 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 (2025-002104)

Dear Madam Clerk and Counsel,

We write to notify the Court that we are beginning the process of uploading additional volumes of the Record on Appeal to my OneDrive account. These new volumes contain materials identified by the Respondent Receiver in his designation of matter, as well as a handful of additional rebuttal authorities that the Charter Appellants have designated that appear at the end of the last new volume. They total over 5,000 additional pages across 11 new volumes. In short, it will take quite some time for these files to upload to my OneDrive. They are also available through this link, through which we are serving these materials on all counsel: <https://download.wbd-us.com/bds/Login.do?id=A06132166185&p1=afj05r5sbhcedchhcjglccffifj20>

Given the extreme volume of new material, we wanted to notify the Court that we are not positive that a printer will physically be able to print and bind 10 copies of all 11 new volumes of the Record (totaling over 50,000 pages of printing and 110 individual booklets) in time for delivery to the Court tomorrow. We will do our very best to meet that deadline, but we wanted to provide the Court with notice of this situation in advance.

We understand that the hard copies of Volumes I through X of the Record on Appeal, as well as the Altrad Appellants' opening brief, have been delivered to the Court. We are also printing

10 copies of the Respondent Plaintiffs' Supplemental Appendix and have those scheduled for delivery at the Court as well.

Please let us know if we can provide the Court with any additional information or materials.
Best,

Todd

From: Carroll, Todd

Sent: Wednesday, December 10, 2025 4:49 PM

To: Supreme Court Filings <suptcfilings@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: 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=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

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>; ejones@gwblawfirm.com <ejones@gwblawfirm.com>; jon@smithrobinsonlaw.com <jon@smithrobinsonlaw.com>; shanon.peake@smithrobinsonlaw.com <shanon.peake@smithrobinsonlaw.com>; vrawl@grsm.com <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: 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

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



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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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