

FILE NAME: Cape Asbestos (CAPE)

DATE: 2023

DOC#: CAPE189

DOCUMENT DESCRIPTION: Lawyer emails Re Altrad Investment Authority and Altrad UK in default [Legal - Tibbs Case Exhibit 87]

Archived: Thursday, October 12, 2023 9:35:33 AM

From: Carroll, Todd

Mail received time: Sun, 20 Aug 2023 20:38:27

Sent: Sun, 20 Aug 2023 20:38:03

To: John T. Lay

Cc: Lindsay Joyner

Subject: RE: 2023-CP-40-01759 CAPE PLC, individually and as successor in interest to CAPE ASBESTOS COMPANY LIMITED, by and through its duly appointed Receiver Peter D. Protopapas v. ANGLO AMERICAN CROP NUTRIENTS (USA), LLC, et al [GWB-IMANMAIN.FID1086139]

Importance: Normal

Sensitivity: None

Warning – This email originated outside the GWB email system!

I can talk now, but we have dinner with kids at a neighbors' house at 5:30 this evening.

From: John T. Lay <jlay@gwblawfirm.com>

Sent: Sunday, August 20, 2023 3:38 PM

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

Cc: Lindsay Joyner <ljoyner@gwblawfirm.com>

Subject: Re: 2023-CP-40-01759 CAPE PLC, individually and as successor in interest to CAPE ASBESTOS COMPANY LIMITED, by and through its duly appointed Receiver Peter D. Protopapas v. ANGLO AMERICAN CROP NUTRIENTS (USA), LLC, et al [GWB-IMANMAIN.FID1086139]

5:30?

Sent from my iPhone

On Aug 19, 2023, at 5:10 PM, Carroll, Todd <Todd.Carroll@wbd-us.com> wrote:



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Great, thank you. I'm around tomorrow after church, so please just give me a shout whenever it's convenient. Have a good evening,

Todd

From: John T. Lay <jlay@gwblawfirm.com>

Sent: Saturday, August 19, 2023 10:54:46 AM

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

Cc: Lindsay Joyner <ljoyner@gwblawfirm.com>

Subject: Re: 2023-CP-40-01759 CAPE PLC, individually and as successor in interest to CAPE ASBESTOS COMPANY LIMITED, by and through its duly appointed Receiver Peter D. Protopapas v. ANGLO AMERICAN CROP NUTRIENTS (USA), LLC, et al [GWB-IMANMAIN.FID1086139]

Let's talk tomorrow afternoon. Does that work?

Confirmed on the extension for Mr Altrad and AIA. Thanks. John T

Sent from my iPhone

On Aug 19, 2023, at 8:41 AM, Carroll, Todd <Todd.Carroll@wbd-us.com> wrote:



Warning – This email originated outside the GWB email system!

Lindsay, John T,

I understand from talking to John T yesterday that your client thinks that Altrad UK is in default, my folks disagree, and we would discuss further next week. In the meantime, I'm trying to get our internal docketing straight for our other two clients in this case. If you could please confirm that the new deadline for Mr. Altrad and AIA to respond to the third-party complaint is September 1st, I will mark that down in our system. Thanks very much--have a great weekend, and safe travels back from Colorado, T!

Todd

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

Sent: Friday, August 18, 2023 4:32:53 PM

To: Lindsay Joyner <ljoyner@gwblawfirm.com>

Cc: John T. Lay <jlay@gwblawfirm.com>

Subject: Re: 2023-CP-40-01759 CAPE PLC, individually and as successor in interest to CAPE ASBESTOS COMPANY LIMITED, by and through its duly appointed Receiver Peter D. Protopapas v. ANGLO AMERICAN CROP NUTRIENTS (USA), LLC, et al [GWB-IMANMAIN.FID1086139]

Thanks, Lindsay. We represent Mr. Altrad, Altrad Investment Authority, and Altrad UK. As I understood from our clients, the earliest any of them had to respond to the third-party complaint was next Monday, so it would be great if we can get an extension and have all three due to file their responses on September 1. If you could confirm by response email, I would appreciate it. Best,

Todd

Todd Carroll

Partner

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From: Lindsay Joyner <ljoyner@gwblawfirm.com>

Sent: Friday, August 18, 2023 4:16:06 PM

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

Cc: John T. Lay <jlay@gwblawfirm.com>

Subject: 2023-CP-40-01759 CAPE PLC, individually and as successor in interest to CAPE ASBESTOS COMPANY LIMITED, by and through its duly appointed Receiver Peter D. Protopapas v. ANGLO AMERICAN CROP NUTRIENTS (USA), LLC, et al [GWB-IMANMAIN.FID1086139]

Todd,

Hope you're doing well. John T. mentioned that you called regarding an extension to align the Third-Party Defendants you have been retained to represent. Who are those Third-Party Defendants again? And as John T. mentioned on the call, we are happy to provide an extension until September 1 for the Third-Party Defendants as long as they are not currently in default. To the extent you'd like to discuss further, please let me know a good number to reach you on or feel free to call my direct dial below.

Thanks,
Lindsay

<image001.jpg>

Lindsay Anne Joyner
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