

From: Valenta, Val

To: 'Gene Matthews' <gmatthews@rpclaw.com>

CC: Adams, Marcia S <Marcia.Adams@SCDMV.net>

Date: 3/24/2009 3:12:47 PM

Subject: FW: Responses to Plaintiffs' Second Set of Interrogatories and Requests for Production - Summers - Adams - 'I Believe'

Attachments: [RG-504 rev 01-05-09.pdf](#)

Gene,

Per Marcia's request for discovery documents.

Val

From: Valenta, Val

Sent: Wednesday, February 04, 2009 4:33 PM

To: 'James Burns'

Cc: 'Emory Smith'; Butch Bowers; 'Todd Carroll'

Subject: RE: Responses to Plaintiffs' Second Set of Interrogatories and Requests for Production - Summers - Adams - 'I Believe'

James,

The following is in regard to the response to interrogatories.

Lotte is out sick this week, so I cannot bounce the following off of her. But the second sentence of the second response paragraph says, "Consistent with the current DMV Policy RG-504 and previous policies," What "previous policies"? RG-504 was a new policy drafted in 2007 to fill a void. I suggest "Consistent with the DMV Policy RG-504, DMV has long interpreted Code Section 56-3-8000 to permit the name of the sponsoring organization on the top of the license plate."

HERE COMES A CAVEAT: I knew there had been discussions about matters left uncovered in the 2007 policy, but somehow it slipped by me that a revised version was issued on January 5, 2009. I believe that needs to be produced as on-going production from the first request for production, so I am attaching it here. I do not see any changes that affect our responses to the interrogatories.

This is really nit-picky, but on pages 4 and 6, statute and policy numbers break at hyphens. I find that documents read easier by using a CTRL+SHIFT+HYPHEN, which will prevent the break.

On page 6, in the first sentence of the first response paragraph, semi-colons should be used after each date. [...Lowcountry, on or about August 30, 2004; Donate Life, on or about the 4th quarter, 2006; South Carolina Chiropractic] The same applies in the next paragraph.

The Response to Production is fine.

Val

From: James Burns [mailto:James.Burns@nelsonmullins.com]

Sent: Wednesday, February 04, 2009 3:02 PM

To: Valenta, Val; Emory Smith

Cc: Butch Bowers; Todd Carroll

Subject: Responses to Plaintiffs' Second Set of Interrogatories and Requests for Production

Val,

Tomorrow is our deadline to respond to Plaintiffs' Second set of Interrogatories and Second Set of Requests for Production. I have attached our responses. I would like for you and Emory to review and let me know if you have any changes.

Thanks so much.

Best regards,
James

[HOME](#) [VCARD](#) [BIO](#) [LOCATION](#)

 <p>James H. Burns Attorney at Law james.burns@nelsonmullins.com</p> <p>Nelson Mullins Riley & Scarborough LLP Meridian, 17th Floor 1320 Main Street, Columbia, SC 29201 Tel: 803.255.9586 Fax: 803.255.5936 www.nelsonmullins.com</p>
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