

From: Valenta, Val

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

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

Date: 3/24/2009 3:20:49 PM

Subject: FW: I Believe-Extension regarding Discovery Responses - Request for Production 3 (third half)

Attachments: Req Prod 3A 07-01-08 9.18 3m.pdf
Req Prod 3A 07-01-08 9.58 3m.pdf
Req Prod 3A 08-05-08 2.30 Devlin.pdf
Req Prod 3A 08-05-08 2.54 Padgett.pdf
Req Prod 3A 08-12-08 3.13 Earley.pdf
Req Prod 3A 08-13-08 10.26 Earley.pdf
Req Prod 3A 08-14-08 1.09 Devlin.pdf
Req Prod 3A 08-14-08 2.31 3m.pdf
Req Prod 3A 08-18-08 2.57 3m.pdf
Req Prod 3A 08-28-08 2.30 Rivera.pdf
Req Prod 3A 08-28-08 8.38 Shealy.pdf
Req Prod 3A 09-18-08 12.30 Shealy.pdf

From: Valenta, Val

Sent: Wednesday, November 19, 2008 5:47 PM

To: 'James Burns'

Cc: 'Butch Bowers'

Subject: RE: I Believe-Extension regarding Discovery Responses - Request for Production 3 (third half)

James and Butch,

We found 12 more emails that fit Request 3. Since I sent two halves of the response earlier, this must be the third half.

I have titled them as '3A' mostly for my convenience.

Val

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

Sent: Tuesday, November 18, 2008 9:10 AM

To: Val.Valenta@scdmv.net

Cc: Butch Bowers; AGESMITH@scag.gov

Subject: RE: I Believe-Extension regarding Discovery Responses

Val,

Has DMV completed compilation of the data? I would like to have all of the information and documents today so I can put the responses together and get a copy over to Emory for review. Please advise.

James

James H. Burns
Nelson Mullins Riley & Scarborough LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
803-255-9586 (dd)
803-255-5936 (fax)
james.burns@nelsonmullins.com

From: Val.Valenta@scdmv.net [mailto:Val.Valenta@scdmv.net]
Sent: Thursday, November 13, 2008 4:59 PM
To: James Burns
Cc: Butch Bowers; AGESMITH@scag.gov; Marcia.Adams@SCDMV.net; Jimmy.Earley@SCDMV.net; Steven.Lake@scdmv.net; Lotte.Devlin@SCDMV.net
Subject: RE: I Believe-Extension regarding Discovery Responses

James,

The one-week extension is a relief. We have 90% of the documents pulled together; I just need to look through some more emails.

We also have some adjustments to the Interrogatory data I sent you.

Val

From: James Burns [mailto:James.Burns@nelsonmullins.com]
Sent: Thursday, November 13, 2008 4:11 PM
To: Val.Valenta@scdmv.net
Cc: Butch Bowers; Emory Smith
Subject: I Believe-Extension regarding Discovery Responses

Val,

I just spoke with opposing counsel regarding discovery responses. We agreed to a one week extension of time to reply. Please continue pressing on getting the information to us as soon as possible. We were somewhat limited by the court's briefing schedule in attaining a longer extension period.

Emory,

Opposing counsel will confirm this in a letter to you among other issues you discussed previously with her.

James

HOME VCARD BIO LOCATION

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|  <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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