

From: Valenta, Val

To: 'Gene Matthews' <gmatthews@rpcrlaw.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



James H. Burns

Attorney at Law

james.burns@nelsonmullins.com

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

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure.

If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message

or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.

To ensure compliance with the requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including the attachments) is not intended or written to be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or tax-related matter[s]. To provide you with a communication that could be used to avoid penalties under the Internal Revenue Code will necessarily entail additional investigations, analysis and conclusions on our part.

=====