From: Valenta, Val
To: 'Gene Matthews' <gmatthews@rpcrlaw.com>
CC: Adams, Marcia S <Marcia.Adams@SCDMV.net>
Date: 3/24/2009 3:17:57 PM
Subject: FW: I Believe-Extension regarding Discovery Responses - Request for Production 1
Attachments: Req Prod 1 RG-504 02-05-07.pdf
Req Prod 1 RG-504 06-11-07.pdf
Req Prod 1 Proc Memo 97-404 09-30-97.pdf
Req Prod 1 Proc Memo 97-404 09-15-98.pdf
Req Prod 1 Proc Memo 00-407 05-24-00.pdf

Gene,

Per Marcia's request for discovery documents.

Val

From: Valenta, Val
Sent: Wednesday, November 19, 2008 10:36 AM
To: 'James Burns'
Cc: Butch Bowers
Subject: RE: I Believe-Extension regarding Discovery Responses - Request for Production 1

James and Butch,

I am going to send documents in separate emails so that they are organized and so that I can send them as I assemble them.

Here are the documents for Request 1.

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

Nelson Mullins

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