

RESPONSE #2:

These Defendants do not request a jury trial. Only equitable relief is sought in this action.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE #3:

Not applicable.

4. State the basis asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE #4:

No challenge is made by these Defendants to the appropriateness of the division.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE #5:

These Defendants are not aware of any related action that is currently pending in the United States District Court for the District of South Carolina.

6. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE #6:

Not applicable.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE #7:

Not applicable.

Respectfully submitted,

DAVIDSON & LINDEMANN, P.A.

BY: s/ Kenneth P. Woodington

WILLIAM H. DAVIDSON, II, Fed. I.D. No. 425

KENNETH P. WOODINGTON, Fed. I.D. No. 4741

DAVIDSON & LINDEMANN, P.A.

1611 DEVONSHIRE DRIVE, 2ND FLOOR

POST OFFICE BOX 8568

COLUMBIA, SOUTH CAROLINA 29202-8568

wdavidson@dml-law.com

kwoodington@dml-law.com

T: 803-806-8222

F: 803-806-8855

ATTORNEYS for Defendants South Carolina Department of Social Services (directors Susan Alford and Dorothy Addison), Office of Governor, Nikki Randhawa Haley

March 14, 2016

s/Kenneth P. Woodington