

From: Valenta, Val

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

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

Date: 3/24/2009 3:20:34 PM

Subject: FW: I Believe-Extension regarding Discovery Responses - Request for Production 2

Attachments: Req Prod 2 RG-504 12-01-06 draft.pdf

Req Prod 2 Policy Meeting Agenda 10-16-06.pdf

Req Prod 2 Policy Meeting Minutes 11-06-06.pdf

Req Prod 2 Policy Meeting Minutes 12-04-06.pdf

Req Prod 2 Policy Meeting Agenda 01-08-07.pdf

Req Prod 2 Policy Meeting Agenda 01-22-07.pdf

Req Prod 2 Policy Meeting Minutes 01-22-07.pdf

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Per Marcia's request for discovery documents.

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**From:** Valenta, Val

**Sent:** Wednesday, November 19, 2008 4:37 PM

**To:** 'James Burns'

**Cc:** 'Butch Bowers'

**Subject:** RE: I Believe-Extension regarding Discovery Responses - Request for Production 2

James and Butch,

Here are the documents for Request 2.

Note that the first attachment, on page one, mentions 'version 2.' No one can find a version 1 or even remembers why 'version 2' was put on this document.

As to the Excel prints, each has only one page that mentions this policy.

Val

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**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

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[james.burns@nelsonmullins.com](mailto:james.burns@nelsonmullins.com)

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**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

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**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

 <p><b>James H. Burns</b> Attorney at Law james.burns@nelsonmullins.com</p> <p><b>Nelson Mullins Riley &amp; Scarborough LLP</b> 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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