

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](#)



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.

=====