

From: Valenta, Val

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

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

Date: 3/24/2009 3:19:55 PM

Subject: FW: I Believe-Extension regarding Discovery Responses - Request for Production 3 (first half)

Attachments: Req Prod 3 06-05-08 4.07 Parks.pdf  
Req Prod 3 06-16-08 5.06 Earley.pdf  
Req Prod 3 06-18-08 2.00 Dolder.pdf  
Req Prod 3 06-18-08 2.15 Earley.pdf  
Req Prod 3 06-19-08 9.04 Padgett.pdf  
Req Prod 3 07-02-08 9.24 Devlin.pdf  
Req Prod 3 07-02-08 9.38 Padgett.pdf  
Req Prod 3 07-10-08 3.15 3m.pdf  
Req Prod 3 07-14-08 3.19 3m.pdf  
Req Prod 3 07-14-08 4.55 3m.pdf  
Req Prod 3 07-25-08 4.04 Devlin.pdf  
Req Prod 3 07-29-08 11.05 Dickerson.pdf

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Per Marcia's request for discovery documents.

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**From:** Valenta, Val

**Sent:** Wednesday, November 19, 2008 3:31 PM

**To:** 'James Burns'

**Cc:** 'Butch Bowers'

**Subject:** RE: I Believe-Extension regarding Discovery Responses - Request for Production 3 (first half)

James and Butch,

Here are the first 12 of 24 documents for Request 3.

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  
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](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 <a href="mailto:james.burns@nelsonmullins.com">james.burns@nelsonmullins.com</a></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 <a href="http://www.nelsonmullins.com">www.nelsonmullins.com</a></p>
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