

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

South Carolina Green Party, Eugene Platt,  
and Robert Dunham,

Plaintiffs,

vs.

South Carolina State Election Commission,  
John H. Hudgens, Cynthia M. Bensch,  
Tracey C. Green, Pamella B. Pinson, and  
Thomas Waring, in their official capacities  
only as Chairman and members respectively  
of the South Carolina Election Commission,

Defendants,

and

Charleston County Democratic Party,

Intervenor-Defendant.

Civil Action No: 3:08-cv-02790-CMC

**INTEVENOR'S RESPONSES TO  
LOCAL RULE 26.01  
INTERROGATORIES**

Intevenor Charleston County Democratic Party hereby responds to Local Rule 26.01

Interrogatories as follows:

**A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

Response: Intevenor is not aware of any person or legal entity who may have a subrogation interest in Plaintiffs' claim.

**B. As to each claim, state whether it should be tried jury or non-jury and why.**

Response: The case should be tried by a jury to the extent that the Plaintiffs are claiming and/or may claim monetary relief but all other matters should be tried non-jury.

**C. 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: Not applicable.

**D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.**

Response: Intevenor does not challenge the appropriateness of this case being filed and assigned to the Columbia Division.

**E. 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 of 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, happenings, 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: Intevenor is unaware of any related cases pending in this Court.

**F. [Defendants only.] 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: Not applicable.

**G. [Defendants only.] 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: There are no claims asserted against Intevenor at this time, but any monetary liability would only be against the original Defendants and not Intervenor.

Respectfully submitted,

/s/ Matthew T. Richardson

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Attorney for Intervenor Charleston County Democratic  
Party

Date: October 8, 2008  
Columbia, South Carolina