

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

SOUTH CAROLINA GREEN PARTY,)
et al.)
)
Plaintiffs,)
)
v.) Civil Action No. _____
)
SOUTH CAROLINA STATE)
ELECTION COMMISSION, et al.)
)
Defendants.)
_____)

PLAINTIFFS' ANSWERS TO LOCAL RULE RULE 26.01 INTERROGATORIES

Interrogatory 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.

Answer:

No person or legal entity has a subrogation interest in any of Plaintiffs' claims.

Interrogatory B:

As to each claim, state whether it should be tried jury or nonjury and why.

Answer:

The claim should be tried without a jury, because it seeks injunctive relief as opposed to money damages.

Interrogatory 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.

Answer:

The party submitting these responses is not a publicly owned company.

Interrogatory 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.

Answer:

Under 28 U.S.C. § 1391(b), the Columbia Division is the proper venue to try Plaintiffs' claims. All of the named Defendants reside within that Division's jurisdiction and all of the events that give rise to the claims occurred there.

Interrogatory E:

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

Answer:

No.

Respectfully Submitted,

/s/Laughlin McDonald
LAUGHLIN McDONALD (ID#2804)
BRYAN SELLS
American Civil Liberties Union
Foundation, Inc.
230 Peachtree Street, NW
Suite 1440
Atlanta, GA 30303-1513
(404) 523-2721
(404) 653-0331 (fax)

ATTORNEYS FOR THE PLAINTIFFS