

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

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|----------------------------------|---|-------------------------------------|
| |) | |
| UNITED STATES OF AMERICA, |) | Civil Action No. |
| |) | |
| Plaintiff, |) | ANSWERS OF THE UNITED STATES |
| |) | TO STANDARD INTERROGATORIES |
| v. |) | PURSUANT TO LOCAL RULE 26.01 |
| |) | DSC |
| CONSOLIDATED MULTIPLE |) | |
| LISTING SERVICE, INC., |) | |
| |) | |
| Defendant. |) | |
| |) | |

Plaintiff United States of America, pursuant to Local Civil Rule 26.01 DSC, respectfully submits the following answers to the Court's standard interrogatories under Local Civil Rule 26.01 DSC.

(A) State the 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: The United States is not aware of any persons or legal entities who have a subrogation interest in the claims.

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

ANSWER: All claims should be tried non-jury because the United States seeks only injunctive relief.

- (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 United States is not a publicly owned company.

- (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).**

ANSWER: The basis for asserting the claim in the division in which it is filed is that Defendant maintains its principal place of business, transacts business, and is found within this District and the 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 Court 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 judge?**

ANSWER: This action is related to *United States of America v. Multiple Listing Service of Hilton Head Island, Inc.*, Civil Action No. 9:07-CV-3435-SB, where the United States raised similar claims against the multiple listing service for Hilton Head, South Carolina. That case has settled.

- (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.**

ANSWER: N/A

(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.

ANSWER: N/A

Respectfully submitted,

KEVIN F. McDONALD
ACTING UNITED STATES ATTORNEY

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**ATTORNEYS FOR PLAINTIFF
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