

STATE OF SOUTH CAROLINA )  
)  
)  
COUNTY OF CHARLESTON )  
)  
)  
MEGAN A. JOHNSON, )  
)  
Plaintiff, )  
)  
v. )  
)  
DANIEL C. MOSS, )  
)  
Defendant. )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT

CIVIL ACTION NO. 2019-CP-10-0496

**PLAINTIFF'S FIRST REQUEST FOR ADMISSION TO DEFENDANT**

COMES NOW Megan A. Johnson, Plaintiff in the above-styled action, and in accordance with Rule 36 of the South Carolina Rules of Civil Procedure, requires Defendant, Daniel C. Moss, to respond, separately and in writing, within thirty (30) days of service hereof, to the following First Requests for Admissions, admitting or denying each paragraph as enumerated below.

1. Admit that Defendant Daniel C. Moss has been correctly named in the present case.
2. Admit that Defendant Daniel C. Moss is a proper party to this cause of action.
3. Admit that Defendant Daniel C. Moss has been properly served as a party-Defendant in this matter.
4. Admit that process is sufficient with regard to Defendant Daniel C. Moss in this case.
5. Admit that service of process is sufficient with regard to Defendant Daniel C. Moss in this case.
6. Admit that you are subject to this court's jurisdiction.
7. Admit that venue is proper in this matter.

FILED  
2019 FEB 22 PM 1:42  
SHEILA J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

THIS 18<sup>th</sup> day of February, 2019.

OLIVER MANER LLP



KATHRYN T. GATHY  
South Carolina Bar No. 103556

218 West State Street  
Savannah, Georgia 31401  
(912) 236-3311  
(912) 236-8725 *facsimile*

*Attorney for the Plaintiff*


**CERTIFICATE OF SERVICE**

This is to certify that I have this day served counsel for all parties in the foregoing matter with a copy of this document by depositing in the United States Mail a copy of same in a properly addressed envelope on the following:

Joseph Stephen Schmutz  
Schmutz & Schmutz  
24 Broad Street  
Charleston, South Carolina 29401


THIS 18<sup>th</sup> day of February, 2019.

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*Attorney for the Plaintiff*

FILED  
2019 FEB 22 PM 1:42  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY 

WILLIAM P. FRANKLIN, JR.  
DAVID H. DICKEY  
I. GREGORY HODGES  
ROBERT W. SCHIVERA (GA & NC)  
PATRICK T. O'CONNOR  
JAMES P. GERARD  
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OF COUNSEL

DOUGLAS J. GIORGIO III (GA & SC)  
OF COUNSEL

February 18, 2019

**Via Certified Mail No. 7012 3050 0001 2506 5953**

Charleston County Courthouse  
Court of Common Pleas, Ninth Circuit  
Attn: Julie J. Armstrong, Clerk of Court  
100 Broad Street, Suite 106  
Charleston, South Carolina 29401-2258

Re: Megan A. Johnson v. Daniel C. Moss  
Court of Common Pleas for the Ninth Judicial Circuit  
State of South Carolina  
Civil Action No. 2019-CP-10-0496

Dear Ms. Armstrong:

Enclosed please find an original and two copies of the following document:

- Plaintiffs' First Requests for Admission to Defendant.

Please stamp each of the documents with the date and time of filing and file this document into the above-referenced matter. We ask that you mark the file-stamped return copies as duplicate originals. Please also find enclosed a self-addressed stamped envelope for return of two of the file-stamped copies.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

OLIVER MANER LLP

  
KATHRYN T. GATHY

Enclosures

Cc: Ms. Megan Johnson  
William J. Hunter, Esq.  
I. William Drought, III, Esq.  
Eric Roden, Esq.  
Allison Marani, Esq.  
R. Atys Mills