

January 7, 2013

The Honorable Jenny Abbott Kitching
Clerk of the S. C. Court of Appeals
Post Office Box 11629
Columbia, S. C. 29211

Charles Taylor
P O Box 3652
Sumter, S. C. 29151

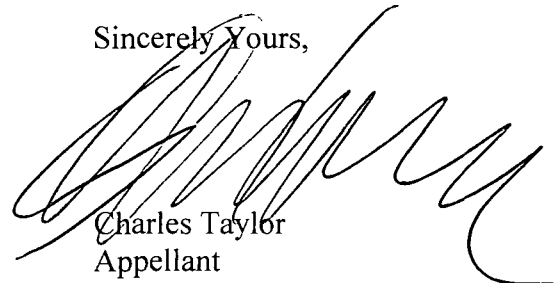
Re: Thomas Davis, Respondent v. Charles Taylor, Appellant; C/A No: 2007-CP-40-8423.

Dear Mrs. Kitchings:

I will not further respond to State Farm/Counsel letters directly to you after this reply to their January 3, 2013 letter; which my reply thereto is; simply that you can believe your own eyes by reviewing the attachment(s).

Again; they are trying to pull a fast one on you-seeking a (non Amicus Curiae) short cut & they know it!; to gain time--an advantage.

Sincerely Yours,



Charles Taylor
Appellant

Cc: Office of Court Administration

Respondent, Thomas Davis

James B. Lybrand, Jr., Esq.
Representing State Farm only

RECEIVED

JAN 08 2013

SC Court of Appeals

W/attachments: re-state farm a party or represent one of the parties, neither of which is so.
Mrs. Kitchings, (For the Record): Please clock & return the enclosed copy to me in the SASE & clock & put one copy of same in the Court's file per this case. I would appreciate it! THANKS!!

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

Charles Taylor,)
)
Plaintiff,)
)
vs.)
)
Thomas Davis,)
)
Defendant.)
_____)

IN THE COURT OF COMMON PLEAS
CIVIL ACTION NO: 2007-CP-40-8423

RESPONSES TO PLAINTIFF'S
REQUESTS FOR ADMISSIONS
DIRECTED TO STATE FARM

EXHIBIT

STATE FARM WAS RECEIVED
NEVER A NAMED
PARTY / DEFENDANT
JAN 08 2013
SC Court of Appeals
In the underlying davis v. taylor case

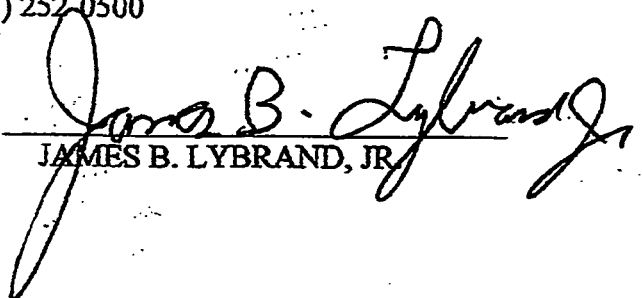
TO: CHARLES TAYLOR, PLAINTIFF:

Pursuant to Rule 26(b) and Rule 36 SCRPC, the following responses are hereby submitted to Plaintiff:

The undersigned objects to Request for Admissions directed to State Farm which is not a party defendant to this action. Pursuant to Rule 36 SCRPC request for admissions may only be directed to a "party" to a civil action. State Farm is not a named party and therefore would not be required to respond to Plaintiff's Request for Admission. Accordingly, objection is made to Request for Admissions 1 through 7 as directed to State Farm.

**BY THEIR OWN
ADMISSIONS!!!**

McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, L.L.P.
POST OFFICE BOX 58
1704 MAIN STREET, 2nd FLOOR
COLUMBIA, SOUTH CAROLINA 29202
(803) 252-0500

BY: 
JAMES B. LYBRAND, JR.

Columbia, South Carolina
November 10, 2010

EXCERPTS FROM STATE FARM

4. State whether or not attorney James B. Lybrand is representing the interest of State Farm only

ANSWER:

Yes. James B. Lybrand, Jr. is representing only State Farm .

5. State whether or not attorney James B. Lybrand is representing the interest of anyone else

ANSWER:

No. James B. Lybrand, Jr. is not representing anyone else

6. State whether or not State Farm is paying attorney Lybrand legal fees to represent the interest of Defendant Davis in this case.

ANSWER:

As stated above James B. Lybrand, Jr. is not representing Defendant Davis.

7. State whether or not State Farm is paying the legal fees of attorney Lybrand to represent the interest of both State Farm and defendant davis at the same time in this case.

ANSWER:

As stated above James B. Lybrand, Jr. does not represent the Defendant Davis in this case.

DISCUSSION

State Farm was not the insurer for Davis and never purported to represent him in this action.