

Exhibit B

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STATE OF SOUTH CAROLINA
COUNTY OF ALLENDALE

) IN THE COURT OF COMMON PLEAS
) FOR THE FOURTEENTH JUDICIAL CIRCUIT
) CASE NO.: 2011-CP-03-051

Dorothy A. Lehew,

Plaintiff,

vs.

R & W Foods, Inc. (d/b/a Allendale IGA)
and Dixie-Riverside, Inc.,

Defendants.

ANSWER
OF
R & W FOODS, INC.
(D/B/A ALLENDALE IGA)

Defendant R & W Foods, Inc. (d/b/a Allendale IGA), hereinafter "IGA," by and through undersigned counsel and responding to the Amended Complaint of the Plaintiff, Dorothy A. Lehew, hereby alleges and states as follows:

ONE: IGA denies each and every allegation not hereinafter specifically admitted and demands strict proof thereof.

FOR A FIRST DEFENSE

TWO: IGA admits Paragraphs One (1) and Two (2).

THREE: Answering Paragraph Three (3), IGA admits that Dixie-Riverside, Inc. is subject to the jurisdiction of this Court, but denies the remaining allegations of said paragraph.

FOUR: Answering Paragraph Four (4), IGA admits that Champion Beverage Distributors, LLC is subject to the jurisdiction of this Court, but denies the remaining allegations of said paragraph.

FIVE: Answering Paragraph Five (5), IGA admits that the acts alleged in the Amended Complaint occurred in Allendale County, but denies any other inference in said paragraph.

SIX: Answering Paragraph Six (6), IGA admits that the Plaintiff was shopping in its store located in Allendale County and further admits that the Plaintiff fell. IGA denies the remaining allegations of said paragraph.

SEVEN: IGA admits Paragraph Seven (7).

EIGHT: IGA denies Paragraphs Eight (8), Nine (9), and Ten (10).

FOR A SECOND DEFENSE

NINE: Furthering answering the Amended Complaint and as a further defense thereto, IGA, without admitting but specifically denying that IGA was negligent or careless as alleged in the Amended Complaint, alleges that, even if IGA was negligent or careless, which it denies, the Plaintiff was guilty of negligence or carelessness which was greater than the negligence or carelessness of IGA and which proximately caused the Plaintiff's injuries and damages, if any, so as to bar recovery herein pursuant to the doctrine of comparative negligence and, alternatively, the Plaintiff was guilty of negligence or carelessness equal to or less than the negligence or carelessness of IGA and which proximately caused the Plaintiff's injuries and damages, if any, so as to reduce proportionately the Plaintiff's recovery herein pursuant to the doctrine of comparative negligence.

FOR A THIRD DEFENSE

TEN: Whatever damages and injuries sustained by the Plaintiff, if any, were a direct and proximate cause of the intervening and/or superseding negligence of an entity or entities other than IGA and, as such, IGA is not liable for any such damages or injuries.

FOR A FOURTH DEFENSE

ELEVEN: The Plaintiff's claim for punitive damages, and any award thereof, would violate the due process clauses of the Fifth and Fourteenth Amendments to the United States Constitution and the due process clause of Article I, Section 3 of the South Carolina Constitution.

WHEREFORE, having fully responded to the Plaintiff's Amended Complaint, R & W Foods, Inc. (d/b/a Allendale IGA) prays that the same be dismissed with prejudice and without costs to this Defendant.

ELMORE & WALL, P.A.



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May 25, 2011
Charleston, South Carolina