

EXHIBIT C

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS

Branch Banking and Trust Company,)
)
Plaintiff,)

C.A. No.: 2012-CP-40-0249

vs.)

**DEFENDANTS' ANSWERS TO
INTERROGATORIES**

Graphic Express, LLC; Lanny R. Gunter, II;)
and Harry B. Benenhaley,)
)
Defendants.)

1. Give the names and addresses of persons known to the parties or their Counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

(a) Lanny Gunter
1115 Mt. Vernon Church Road
Chapin, SC 29036
No statement taken.

(b) Harry B. Benenhaley
407 Brandywine Drive
Columbia, SC 29212
No statement taken.

(c) William C. Copeland
206 Valley Vine Court
Irmo, SC 29063
No statement taken.

2. For each person known to the parties or counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

Witnesses 1(a) and (b) are the individual Defendants in this case. They will testify with regard to their dealings with the Plaintiff, the various loans with Plaintiff, representations made

by Plaintiff's agents, and Plaintiff's breach of the contract between the parties.

Witness 1(c) will testify as to the day-to-day operations of the corporate Defendant.

3. **Set forth a list of photographs, plats, sketches, letters, emails, loan documents, payment stubs, checks, statements, or other prepared documents in possession of the parties that relate to the claim, counterclaim, or any defenses in the case.**

None.

4. **List the names and addresses of any expert witnesses whom the party proposes to use as a witness at the trial of the case.**

Defendants have not retained the services of an expert witness at this time but reserves the right to do so in the future.

5. **State with particularity the facts and list any documents which you contend give rise to or support any other counterclaims and/or defenses claimed and alleged by Defendants.**

Defendants object to this interrogatory on the grounds that it is overly broad and could be construed in such a way as to seek production of documents and/or matters protected from discovery as attorney work product. Further, as discovery is ongoing, this request is premature.

Defendants reserve the right to supplement this response as discovery progresses in this matter.

COUNSEL FOR THE DEFENDANTS RESERVES THE RIGHT TO SUPPLEMENT THESE RESPONSES UPON FURTHER DISCOVERY.

MOORE, TAYLOR & THOMAS, P.A.

BY: 

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(803) 796-9160

ATTORNEYS FOR DEFENDANTS

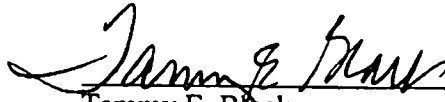
West Columbia, South Carolina
August 1, 2012

STATE OF SOUTH CAROLINA)
)
COUNTY OF LEXINGTON)

AFFIDAVIT OF SERVICE BY MAIL


PERSONALLY appeared before me Tammy E. Black who, on oath, says she is an assistant to S. Jahue Moore, the attorney for the Defendants in this action; and that she has this day, pursuant to his instructions, effected service of the **DEFENDANT'S ANSWERS TO INTERROGATORIES** upon the attorney for the Plaintiff, by placing a copy of said **DEFENDANT'S ANSWERS TO INTERROGATORIES** in an envelope in the United States Mail, with sufficient postage affixed thereto, addressed as follows:

R. Timothy Whisler, Esquire
CLAWSON & STAUBES, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492



Tammy E. Black

SWORN to before me this ^{1st} _____
day of August, 2012.



Notary Public for South Carolina (SEAL)
My Commission Expires: 3-31-2018