

- (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 Plaintiff filed the Complaint in the Rock Hill Division based on the Plaintiff's principle place of business.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provided: (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 Clerk of Court based on a determination of whether the cases: arrive 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 judges.

Answer: This action is not related to any other matter filed in this District.

Respectfully Submitted,

ATTORNEYS FOR PLAINTIFF,

Date: November 20, 2012

/s/ Steven R. LeBlanc
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