

**FILED**

27

**JAN 6 2003**

**LARRY W. PROPPS, CLERK  
CHARLESTON, SC**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENWOOD DIVISION**

DIRECTV, INC., a California Corporation,  
  
Plaintiff,  
  
v.  
  
Stephen Nicholson,  
  
Defendant.

Case No.:

**8 03 0042 18**

**PLAINTIFF'S ANSWER TO LOCAL  
RULE 26.01 INTERROGATORIES**

Pursuant to Local Rule 26.01, Plaintiff DIRECTV, Inc. ("DIRECTV") answers as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Jury

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: DIRECTV is not a publicly owned company. DIRECTV is the indirect subsidiary of General Motors Corporation, which is a publicly owned company.

(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: This action is brought in the district where the defendant(s) reside(s).

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation 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; arise 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:

1. **Case No.: 2 02 3041 18**

DIRECTV, INC., a California Corporation

v.

Bill Collins, Robbie Free, David Hurst,  
Derrick Hodge, Elijah Cromedy, Gail  
Ferguson, Steve Franks, Shirley W.  
Nichols, Richard Cromedy and Jack Goynes

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**Case No.: 8 02 3069 18**

DIRECTV, INC., a California Corporation

v.

Stanley Brock

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**Case No.: 9 02 3068 18**

DIRECTV, INC., a California Corporation

v.

Rolenzo Coker and James Fichtenkort

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**Case No.: 3 02 3067 18**

DIRECTV, INC., a California Corporation

v.

Darrin Harris, Reggie White, James Hollingsworth,  
Will Hollingsworth, Jeff Henrie, and Nettles Myers

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**Case No.: 8 02 3089 18**

DIRECTV, INC., a California Corporation

v.

Brandon Moore

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**Case No.: 6 02 3090 18**

DIRECTV, INC., a California Corporation

v.

Steve Kent and Christopher Talley

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**Case No.: 0 02 3088 18**

DIRECTV, INC., a California Corporation

v.

John Sittley

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**Case No.: 7 02 3087 18**

DIRECTV, INC., a California Corporation

v.

Ronnie Jolley

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**Case No.: 1 02 3192 18**

DIRECTV, INC., a California Corporation

v.

Anthony Maxted, Christopher Barnes and  
Craig Bailey

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**Case No.: 8 02 3193 18**

DIRECTV, INC., a California Corporation

v.

Robert Douglas Root

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**Case No.: 2 02 3194 18**

DIRECTV, INC., a California Corporation  
v.

Leroy Cromedy, Wylie Runey, John W. Lowder,  
Adell Gibbs, Allan Cabading and David Brunson

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**Case No.: 3 02 3195 18**

DIRECTV, INC., a California Corporation  
v.

Ashley Stewart, Larue Billy McKay, Jr. and  
Dan Johnson

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**Case No.: 4 02 3196 18**

DIRECTV, INC., a California Corporation  
v.

Brandon McKimney, Brian E. Rhoad and Berry Boger

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**Case No.: 6 02 3197 18**

DIRECTV, INC., a California Corporation  
v.

Barry Fisher and David L. Gregg

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**Case No.: 0 02 3198 18**

DIRECTV, INC., a California Corporation  
v.

Charles E. Harnatkiewicz and Daryl Partyka

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**Case No.: 7 02 3199 18**

DIRECTV, INC., a California Corporation  
v.

Christopher Borders, Charles Peters and  
Steven Peeler

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**Case No.: 8 02 3306 18**

DIRECTV, INC., a California Corporation  
v.  
Bruce Jordan and Jay Klein

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**Case No.: 9 02 3305 18**

DIRECTV, INC., a California Corporation  
v.  
Alex S. Flora, Sr. and Carl White

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**Case No.: 2 02 3304 18**

DIRECTV, INC., a California Corporation  
v.  
Ed Dixon, Harold R. Ellingham, Evans Jenkins  
Charles M. Towns and Charles Wood

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**Case No.: 3 02 3303 18**

DIRECTV, INC., a California Corporation  
v.  
James Lequiet Ashford, Jr. and James Head

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**Case No.: 4 02 3302 18**

DIRECTV, INC., a California Corporation  
v.  
Hugh Brigman, Morgan Butcher, James Cole,  
Christopher Brent Harrelson, George Kampiziones,  
Edward Milligan and Edward Milligan, II

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**Case No.: 6 02 3301 18**

DIRECTV, INC., a California Corporation  
v.  
Edward Malone, James Paris and Marius Teordorescu

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**Case No.: 8 02 3299 18**

DIRECTV, INC., a California Corporation  
v.  
Barry J. Crocker and Cynthia Norman

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**Case No.: 0 02 3300 18**

DIRECTV, INC., a California Corporation

v.

Ernest Eckel

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**Case No.: 7 02 3298 18**

DIRECTV, INC., a California Corporation

v.

Donnie Allen, Greg Fleming, Frank Morgan and  
Erich Walter Stinson

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**Case No.: 8 02 3581 18**

DIRECTV, INC., a California Corporation

v.

Roger Turner

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**Case No.: 6 02 3584 18**

DIRECTV, INC., a California Corporation

v.

Jeffery A. Goolsby and James Miller

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**Case No.: 4 02 3583 18**

DIRECTV, INC., a California Corporation

v.

Sonia Erwin and Toby Bell

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**Case No.: 1 02 3580 18**

DIRECTV, INC., a California Corporation

v.

James Poorbaugh

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**Case No.: 3 02 3562 18**

DIRECTV, INC., a California Corporation

v.

Jody Atkins

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**Case No.: 0 02 3585 18**

DIRECTV, INC., a California Corporation

v.

John Gore

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**Case No.: 7 02 3586 18**

DIRECTV, INC., a California Corporation

v.

Curtis W. Nance and Joe Wilson

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**Case No.: 7 02 3835 18**

DIRECTV, INC., a California Corporation

v.

Clyde Jung

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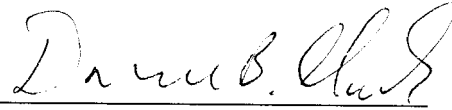
2. All cases assert that the defendants have purchased and/or used Pirate Access Devices that are designed to permit viewing of DIRECTV's television programming without authorization by or payment to DIRECTV.

(B) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

Respectfully submitted

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