

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

SIDNEY LYLES,

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No. 3:20-cv-03473-MGL

**DEFENDANT'S RESPONSES  
TO LOCAL RULE 26.01  
INTERROGATORIES**

Defendant Allstate Insurance Company ("Allstate"), by and through the undersigned counsel and pursuant to Local Rule 26.01, responds to the Rule 26.01 Interrogatories 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.**

Allstate is not aware of any person or legal entity who may have a subrogation interest in any of the claims asserted by Plaintiff Sidney Lyles ("Lyles").

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

Lyles asserts claims for breach of contract, tortious interference with contract, tortious interference with prospective economic opportunity and loss of prospective profits, conversion, and violation of the South Carolina Unfair Trade Practices Act, S.C. Code Ann. § 39-5-10, et seq. Plaintiff demands a jury trial on his claims. Allstate does not waive its right to contest this request.

- 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.**

Allstate is a wholly owned subsidiary of Allstate Insurance Holdings, LLC, which is a

Delaware limited liability company. Allstate Insurance Holdings, LLC is a wholly-owned subsidiary of The Allstate Corporation, which is a Delaware corporation. The stock of The Allstate Corporation is publicly traded. No publicly held entity owns 10% or more of the stock of The Allstate Corporation

**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). See Local Civil Rule 3.01.**

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Allstate removed this case from the Court of Common Pleas for the Fifth Judicial Circuit, County of Richland, South Carolina.

**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 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: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for other reason would entail substantial duplication of labor if heard by different judges.**

Allstate is not aware of any other matter filed in this District, whether civil or criminal, which is related in whole or in part to this action.

**F. 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.**

Allstate is properly identified.

**G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

Allstate is not aware of any such person or legal entity.

Dated: September 30, 2020

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Honore N. Hishamunda

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