

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

UNITED STATES OF AMERICA,)
Plaintiff,)
ex rel. PETER MICHAEL WANCO,)
JR.,)
Plaintiff-Relator,)
v.)
MOX SERVICES, LLC, and ORANO)
FEDERAL SERVICES, LLC,)
Defendants.)

Cause No.: 1:19-CV-00196-JMC

Defendants' Responses To Local Civil Rule 26.01 (D.S.C.) Interrogatories

Defendants, MOX Services, LLC and Orano Federal Services LLC, hereby respond to the interrogatories required by Local Civ. Rule 26.01 (D.S.C.) 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.

RESPONSE: Defendants are not aware of any person or legal entity which has a subrogation interest in the Defendants' claims. However, Defendants reserve the right to amend this response if it later discovers the existence of such an interest.

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

RESPONSE: Defendants reserve the right to assert counterclaims against the Plaintiff; however, at this time no such counterclaims are being made. Defendants likewise reserve the right to seek a jury trial for any such counterclaims. Plaintiff has requested a jury trial. Defendants do not believe there are any issues of fact to be tried by a jury and assert that Defendants are entitled to judgment as a matter of law.

- (C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Defendants are not a publicly owned. Defendant MOX Services, LLC is an unpopulated LLC. The members of Defendant are: CB&I Project Services Group, LLC, which owns (70%); and Orano USA LLC, which owns (30%) and is not publicly traded. CB&I Project Services Group, LLC, is ultimately owned by McDermott International, Inc., which is a publicly traded company.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenges to the appropriateness of the division).

RESPONSE: The Defendants do not object to the present venue but reserve all rights.

- (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 that *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.

RESPONSE: This action arises out of an employment relationship between Orano Federal Services LLC and the Plaintiff. MOX Services, LLC did not employ the Plaintiff. Defendants do not believe this matter is related to any other matters presently pending in the United States District Court for the District of South Carolina.

- (F) If the Defendants are improperly identified give the proper identification and state whether counsel for the Defendants will accept service of an amended summons.

RESPONSE: Defendants are properly identified.

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

RESPONSE: Defendants are not presently aware of any such person or legal entity; however, Defendants reserve all rights to identify any such person or legal entity if they, individually or collectively, become aware of any such person or legal entity.

Respectfully submitted,

/s/Noah M. Hicks II

Noah M. Hicks II, Fed. Id. No. 9473

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 12 February 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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