

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

CHARLESTON DIVISION

VALERIE THOMAS, M.D. and)
ROBERT E. THOMAS, JR., P.A.,)
individually and as Personal)
Representative of the Estate of Benjamin)
Thomas,)

Plaintiffs,)

vs.)

Coca-Cola Company, Coca-Cola Bottling)
Company Consolidated, Piedmont Coca-)
Cola Bottling Partnership, Joseph James)
Stevens, Willbrook Links Investment)
Group, LLC, d/b/a Tradition Golf Club,)
Palmetto Labor Services, Inc., Nivardo)
Ramirez,)

Defendants.)

Civil Action No. 2:08-cv-01580-PMD

GRANTED



PATRICK MICHAEL DUFFY
United States District Judge

January 13, 2010

DEFENDANT COCA-COLA
BOTTLING CO. CONSOLIDATED'S
MOTION IN LIMINE REGARDING
ANY SUGGESTION THAT JOSEPH
STEVENS' DRIVER'S LICENSE WAS
SUSPENDED

Defendant Coca-Cola Bottling Company Consolidated (“CCBCC”) hereby moves, *in limine*, to preclude Plaintiffs from tendering any insinuation at trial that Joseph Stevens' driver's license was ever suspended, either before or during his employment with CCBCC.

Throughout the discovery process, Plaintiffs' counsel has questioned virtually every lay and expert witness as to whether Joseph Stevens' driver's license was suspended shortly before he came to work for CCBCC, implying that it was. As established unequivocally by the Rule 30(b)(6) deposition of the South Carolina Department of Motor Vehicles on December 15, 2009, Joseph Stevens' driver's license was never suspended. (William Wannamaker Dep. Tr. at 5:6-17, 9:13 - 10:2) (attached as Ex. 1).