

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

GLT2, LLC,

Petitioner,

vs.

JANE DOE and JOHN DOE,

Respondents,

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2025-CP-10-00981

**AFFIDAVIT OF  
BARRETT BREWER, ESQ.**

NOW COMES THE UNDERSIGNED, Barrett R. Brewer, Esq., who first being duly sworn deposes and states that:

1. I am an attorney with Brewer Law Firm, LLC, and am over the age of 18.
2. I am a member of the South Carolina Bar Association and was admitted to the practice of law in 2002.
3. Our firm was retained by GLT2, LLC, to file the above-referenced action for GLT2, LLC. This firm did not incorporate GLT2, LLC. This firm has represented a number of interrelated companies and businesses which Patrick Bryant owns an interest in, all with various names and incorporations, organized both in South Carolina and other states.
4. These various companies often have acronym-type names. Sometimes, over the years, Mr. Bryant, and/or companies he has an ownership in, restructure the ownership interests or corporate structures of the relationships between companies, such that it is not unusual for the undersigned to be retained to work for an LLC with an unusual acronym, or that the undersigned has not had a history of representing.
5. For instance, in 2024 Nancy Mace filed suit against Patrick Bryant regarding ownership in various real estate holdings. See Complaint, 2024-CP-10-01725. That lawsuit actually dealt with their mutual ownership in a South Carolina LLC called PJME, LLC, which apparently Mace forgot the name of in pleading the case. The name of that company was not listed in the pleadings and the undersigned learned very little about the history of the LLC and/or how long it had been in business.

6. It is not feasible for this firm to keep track of the various different companies, that Mr. Bryant owns an interest in, and/or the different lawyers and law firms handling different aspects of different matters for Mr. Bryant and/or those various companies.
7. For instance, Jane Doe Intervenor, has filed suit against Bryant, Assignment Desk Works, and GLT2, LLC. Mr. Bryant owns an interest in GLT2, LLC, and Assignment Desk Works. On or about July 11, 2025, the law firm Saxton & Stump, LLC, filed a Motion to Dismiss, on behalf of GLT2, LLC, in Doe v. Bryant, GLT2, LLC, et. al. See 2025-CP-10-03124. That pleading by Saxton & Stump indicates that, "GLT2, LLC, is, as alleged, the alter ego of Defendant Patrick Bryant and any relief to which Plaintiff may be entitled is protected and preserved by his participation in the litigation". See Defendant GLT2, LLC's Motion to Dismiss, in Case No. 2025-CP-10-03124, on July 11, 2025.
8. At the time of the filing of the Petition in this matter, on February 21, 2025, what was known to the undersigned was that Mr. Bryant and/or his various businesses were being accused by Mace of committing acts of sexual abuse, rape, and/or of filming those acts against several undisclosed persons, in a House Floor Speech, and in other forums. The statements were vague, non-specific, and/or inconsistent in describing the exact factual nature of whatever tortious or criminal act Mr. Bryant and his business partners were being accused of by Mace. These public statements of Mace detailed dozens of anonymous Doe claimants, who intended on coming forward with legal action against Bryant.
9. The undersigned understands and believes that Bryant and his various business interests have been damaged by these false allegations, and/or by the publication that he would be sued or indicted by unknown Doe claimants for vague allegations of rape, sexual abuse, and/or the filming of rape or sexual abuse. It was understood by the undersigned that this would include all manner of various company and LLC interests that Mr. Bryant has, including but not limited to ownership interests in various rental properties that Mr. Bryant can no longer rent, and including board positions and seats in various companies that Bryant holds an ownership interest in.
10. At the time of the filing of the Petition in this matter, what was believed by the undersigned was that Nancy Mace was claiming legal immunity from suit for any and all statements or publications she has made about Bryant, and/or about the other businessmen Mace has accused of being sexual predators citing the Speech and Debate clause of the Constitution and the Westfall Act. See July 11, 2025, Post and Courier, *Can US Rep Nancy Mace be shielded from a defamation suit? A judge will have to decide.*

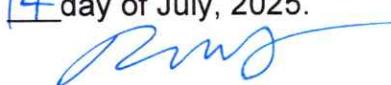
11. At the time of the filing of this Petition, the undersigned did not have sufficient details and information to identify the name of adverse party, or to specify the exact facts upon which the adverse party would come forward to make false claims, and/or bring suit against Mr. Bryant, such as to allow counsel to be appointed to appear for the potential Doe claimants.
12. Ironically, the lack of information available to Petitioner and/or to the undersigned was a direct problem caused by Mace's own inequitable publications to the media and public that she was the key witness and relator of several unspecified criminal and tortious acts, which, she claimed, Bryant and others committed against several unidentified persons.
13. The undersigned was hopeful that witness interviews might produce sufficient information with which to amend the pleadings prior to a potential hearing, in order to bring the Petition into full compliance with SCRCP Rule 27, such as to allow any depositions taken after the hearing to be compliant with Rule 32. SCRCP Rule 27 does not discuss the issuance of a subpoena, and Rule 45 is nowhere mentioned within Rule 27.
14. The undersigned also conferred with Donehue's counsel, prior to Donehue's deposition. Counsel for Donehue was aware that a hearing on the Petition had not occurred, but the undersigned and counsel for Mr. Donehue reached what they believed was a resolution, that Donehue would comply with the issued subpoena, without the need for a Court Order compelling his attendance (Donehue's counsel has recently reconfirmed the above understanding with the undersigned).
15. The undersigned had a good faith belief, that the Donehue deposition taken prior to a hearing on the Petition, effectively rendered the Donehue deposition as equivalent to a sworn statement or affidavit, and that any deficiency in the Petition, or lack of a court hearing or order would go to admissibility of the deposition or sworn statement in any subsequent legal matter, as governed by SCRCP 32.
16. By the time of the taking of Donehue's deposition of Donehue, the undersigned had learned the name of several persons who could be potential Doe claimants. The undersigned asked Donahue in the deposition if he had ever heard their names.
17. According to Charleston County Circuit Court filings, on May 7, 2025, after the Donehue deposition, a lawsuit was filed by a company called Assignment Desk Works, LLC ("ADW"), another entity which Mr. Bryant owns an interest in. That suit was filed by the law firm of Saxton & Stump. That lawsuit alleges that the former employee of ADW violated a non-disparagement agreement.

18. Subsequently, on June 10, 2025, a person named Jane Doe filed an Amended Complaint against Bryant, GLT2, LLC, and Assignment Desk Works, LLC. As of this date, it is unclear if the former employee/defendant in the ADW case is the same person as the Doe claimant in the June 10, 2025, matter, but there does appear to be some overlap. Doe's insistence on moving forward with a pseudonym, and not identifying herself, has continued to make it difficult to confirm with 100% certainty, the identity of this particular Doe claimant.
19. GLT2, LLC and ADW have overlapping counsel in Saxton & Stump, though in various other matters. Fact-finding in the ADW case that Saxton & Stump has filed against the former ADW employee/defendant has resulted in an affidavit, signed on May 9, 2025, by ADW employee Erin Gunther, who had a conversation with the former ADW employee/defendant in the ADW case. See Affidavit of Erin Gunther from ADW case.
20. Various filings by counsel for Doe have indicated that Doe is likely the person referenced in the case brought by ADW. According to the Gunther Affidavit, Doe told Gunther, "I called my lawyer last week and told them, 'Nancy's making all this up. This is literally a lie so she can get in some political position'".
21. The receipt of this Gunther affidavit by the undersigned, confirmed for the undersigned the importance of the sworn testimony of Donehue as relevant to Mace's credibility in a potential Doe case that Mace had announced. Mace's credibility was potentially a critical issue, but that Mace and Doe were, at the time, fighting a battle against Petitioner in public, while simultaneously withholding critical information about who the claimants were, and what the specific allegations were, and placing Petitioner in an impossible position.
22. The undersigned has not communicated with any media employees, personnel, or representatives about this Petition or the deposition of Donehue.

AFFIANT SAYETH FURTHER NOT

  
Barrett R. Brewer, Esq.  
Attorney for GLT2, LLC

SWORN to before me this the  
14 day of July, 2025.

  
(SEAL)  
Notary Public of South Carolina

My commission expires: 9/11/2034

