

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

Alexis Berg,

Plaintiff,

vs.

Patrick Bryant, John Osborne, Eric Bowman,
Pommer Group LLC, Assignment Desk Works
LLC and GLT2, LLC,

Defendants.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
C/A NO.: 2025-CP-10-03124

**DEFENDANTS PATRICK BRYANT'S
AND ERIC BOWMAN'S ORDER TO
SHOW CAUSE AND MOTION FOR
CIVIL CONTEMPT AGAINST NANCY
MACE BASED ON HER REPEATED
VIOLATIONS OF THE COURT'S
NOVEMBER 26, 2025 GAG ORDER**

Patrick Bryant,

Third Party Plaintiff,

vs.

Nancy Ruth Mace and Melissa Britton,

Third Party Defendants.

Patrick Bryant ("Bryant") and Eric Bowman ("Bowman"), through their respective counsel, hereby move for an Order to Show Cause holding Third Party Defendant Nancy Ruth Mace in civil contempt for repeated violations of this Court's November 26, 2025 Gag Order and state as follows:

I. NANCY MACE'S PRIOR DEPLORABLE CONDUCT TOWARDS PARTIES AND THEIR COUNSEL

1. Since February 10, 2025, Nancy Mace has repeatedly disparaged and defamed Patrick Bryant, Eric Bowman and Jon Osborne by calling them "rapists" "criminals" and

“predators” during Congressional speeches and through her social media platforms (including her official Congressional accounts).

2. Despite no evidence of any wrongdoing, Mace continued her deplorable conduct in speeches, and on social media up through the filing of the First Amended Complaint dated June 10, 2025. She even escalated her defamatory remarks towards Bryant calling him a pedophile and serial rapist.

3. On November 6, 2025, Bryant filed a Third-Party Complaint against Nancy Mace, based in part on her defamatory remarks, in addition to claims for her theft and conversion of his cell phone (which she admitted to accessing a private, secure folder on his cell phone in her responses to Bryant’s Request for Admissions).

4. Mace, who had not yet retained an attorney, continued her deplorable and unprofessional conduct, but this time directed it at Bryant’s attorney. By way of example:

- On November 14, 2025, Mace lashed out at Bryant’s counsel, Nosizi Ralephata who was simply trying to confirm if Mace had counsel, in three separate e-mails, by stating:

...Cute but also careless Nosizi. I hope Bryant is paying you well. And I hope he pays out his sanctions in court soon. Rape Victim Jane Doe and I are patiently waiting.

What's most fucked up about this is you have a rapist, suing rape victims. Sick. Disgusting. Gross. Also, note how I did not say "alleged" in my previous sentence. You guys are completely cooked.

You poked the wrong bear

If you'd like to see what I really think of alleged rapist Bryant - please continue to follow me on all of my social media accounts.

I'll see you in court.

CNM

No, you opened this pandora's box and you can deal with the consequences. I will fight like hell to protect women and girls with every fiber of my being. It's why I signed the Epstein discharge petition to my own personal and professional detriment. Wait until you hear about the possible CHILD SEXUAL ABUSE MATERIAL on your client's phone (allegedly).

Your process server tried to force his way into my federal office this morning. Threatened to "throw" paperwork at me at a public event. Then denied it. And mind you, I've already been physically assaulted by your client on 3 separate occasions.

FUCK YOU AND EVERY PEDOPHILE AND RAPIST YOU'VE EVER REPRESENTED.

CNM

- Then, only two days later on November 16, 2025, Mace threatened Bryant's other counsel, Matthew Gallo and took a malicious jab at Mr. Gallo's deceased mother:

Matt,

"Your mom."

That's my response to your continued harassment of a sitting Member of Congress and victim of your client's continued abuse. Keep it up and see what happens.

That's a promise, not a threat.

Sincerely,

CNM

5. These are the actions of a sitting Congressman. Mace then proceeded to boast about her unhinged conduct on “X” claiming she “threatened Bryant’s attorneys.”

II. THE COURT’S GAG ORDER, EXTENSION, AND NOTICE

6. On November 17, 2025, Bryant filed a Temporary Restraining Order to stop Mace’s profanity filled threats and public smears against Bryant, Bowman and Osborne.

7. On November 26, 2025, this Court entered a written Gag Order in this action. The Gag Order was circulated by Judge Hocker, via e-mail, to all counsel of record on November 26, 2025 at 2:23 p.m.

8. The Gag Order directs counsel to provide their clients with a copy of the Order. Counsel for Mace, Craig Brown was copied on the e-mail and therefore received the Gag Order. Thus, Mace and her agents had actual notice of the Gag Order.

9. The Gag Order applies to “all of the above parties” including Nance Mace, and to their agents, representatives and attorneys.

10. The Gag Order sought to “[e]nsure that every party to this case receives a fair, just, and reasonable resolution to their respective claims, interests and concerns.”

11. The Gag Order specifically prohibits:

a. Making or publishing any comment about any aspect of this case (other than attorney client communications) via oral, written, social media, text or any other form of communication;

b. Making or publishing any comment about any party or attorney to this case or anyone connected to this case (other than attorney client communications) via oral, written, social media, text or any other form of communication; and

c. Publishing, transmitting, posting or sharing any documents, videos, photographs or any other materials related to any aspect of this case and or any party and or attorney and or any person connected to this case (other than attorney client communications).

A true and correct copy of the Gag Order is attached as **Exhibit 1**.

12. By subsequent email instructions to counsel dated December 18, 2025, the Court extended the Gag Order. A copy of Judge Hocker's December 18 e-mail is attached as **Exhibit 2**.

13. During the December 30 hearing, and after the Court was advised of Mace's continuing public statements, the Court stated on the record that it would consider contempt proceedings relating to violations of the Gag Order upon the filing of an appropriate motion. This Motion follows.

III. MACE'S BLATANT VIOLATIONS OF THE GAG ORDER

14. After entry and extension of the Gag Order, and during its effective period, Mace has repeatedly made and amplified public statements about this case, about parties to this case, and about persons connected to this case, and has published related video and email content, in direct violation of the Gag Order.

15. *First*, on November 26, 2025, at 6:43 p.m.¹, Mace, from her verified X account **@RepNancyMace**, publicly responded to a post reporting that "Eric Bowman has been granted bond on his domestic violence and harassment charges, 60k each" by stating: "*Not nearly enough. Very concerned for the safety of his victims. Keeping them in my prayers tonight.*"

16. The post names Eric Bowman, labels unnamed persons "his victims," and comments on alleged criminal conduct that is the subject of this matter. A true and correct copy of Mace's X post is attached as **Exhibit 3**.

¹ Notably, it only took Mace less than 4-hours to violate the Court's Gag Order.

17. *Second*, on November 28, 2025, at approximately 11:00 a.m., from the same verified @RepNancyMace account, Mace posted: “IMPEACH ALL CORRUPT JUDGES” and, in the same thread: “Especially including those in South Carolina SPECIFICALLY.”

18. It may be reasonably inferred that Mace is criticizing the same judges she criticized only days earlier when naming Mr. Bowman. A true and correct copy of Mace’s X post is attached as **Exhibit 4**.

19. *Third*, after the Court extended the Gag Order, counsel for Eric Bowman, Robert Merting, emailed the Court to report that Mace had posted a video on Instagram from @repnancymace on December 27, 2025 at 10:00 pm in which Mace referred to Eric Bowman by his full name, called him a “wife beater,” and associated his name with “pedophiles,” implying criminal conduct that has not been alleged in this litigation. Counsel’s email, dated December 29, 2025 includes a link to the video. A true and correct copy of Mr. Merting’s email is attached as **Exhibit 5**, and a copy of the Instagram video and a transcript of the same are attached as **Exhibits 6 and 7²**.

20. *Fourth*, on December 1, 2025, Mace’s Congressional office sent a mass email newsletter titled “Rep. Nancy Mace says 2 more women accuse her ex-fiancé of abuse.” The newsletter states, among other things, that:

- a. “Two additional women have come forward to report alleged abuse by Patrick Bryant,” bringing renewed urgency to ongoing investigations and the need for potential victims to seek help;
- b. “The allegations against Bryant include purported child sexual exploitation material, multiple rape accusations, and hidden cameras used to film women without their knowledge or consent;”

² A copy of Instagram video will be downloaded to a thumb drive and sent via FedEx to Your Honor’s attention.

- c. “Patrick Bryant and his attorneys continue to harass his victims for doing what’s right,” followed by, “I WILL NOT be silenced. I will fight for you;” and
- d. Urges anyone who believes they may have been victimized by Patrick Bryant or who has information relevant to “ongoing investigations” to contact Ms. Mace’s federal office, which will provide contact information for law enforcement investigators, including SLED, connect victims with resources, and “protect” those who come forward.

A true and correct copy of this newsletter is attached as **Exhibit 8.**

21. Mace will argue that this newsletter was sent in furtherance of her official Congressional duties and her first amendment rights cannot be infringed. This argument is baseless as the Gag Order specifically prohibits identifying and disparaging the parties and their counsel. Additionally, Mace’s theft and conversion of Bryant’s phone were not performed in connection with *any* Congressional duties, and she certainly does not have First Amendment rights for such unlawful actions.

22. In sum, Exhibits 3-8 identify Patrick Bryant and/or Eric Bowman by name, accuse them of serious criminal conduct that overlaps with issues in this case, accuse Patrick Bryant and his attorneys of “harassing” alleged victims, solicit additional complainants and witnesses concerning Patrick Bryant, and attack judges “including those in South Carolina specifically” while the Gag Order was in effect.

23. Mace did not stop there. After the December 30 hearing in which the Court extended the Gag Order, Mace, from her verified @RepNancyMace account, again amplified the same video in which she refers to Eric Bowman as a “wife beater” and links him to “p*dophiles” by publishing a new, pinned X post that states, “When your state Attorney General drops nearly every case and or charge against p*dos, that’s when you know your state is a p*dophile paradise,”

while tweeting her December 27, 2025 video post. This post was published on December 31, 2025, at approximately 4:29 p.m.

24. This new tweet, which is pinned at the top of her profile and has been viewed more than 20,000 times, republished and further disseminated the same video content during the effective period of the Gag Order. A true and correct copy of this pinned post is attached as **Exhibit 9.**

25. Each of the communications described above is a “comment about” parties, attorneys, and/or persons connected to this case, or about aspects of this case and the underlying allegations and is published through social media or email to the general public. Each communication therefore falls squarely within the conduct prohibited by the Gag Order.

26. Mace has persisted in this conduct despite the entry of the Gag Order, the Court’s email extending it, counsel’s direct email to the Court identifying a specific violation, and the Court’s statement at the December 30 hearing that it would consider contempt proceedings upon motion. Her conduct is deliberate, repeated, and continuing.

IV. ARGUMENT

27. To support civil contempt, a movant party must show that a valid court order exists, that the parties had knowledge of the order, and that she willfully disobeyed it.

28. The Gag Order is clear and specific. It was served on counsel for Mace, Craig Brown, and he was obligated to convey it to his client. The Court later extended the Order and reminded counsel of its force and effect.

29. Additionally, the Court reminded counsel of the Gag Order’s effect, and Mace was personally present for the hearing and this reminder.

30. The social media posts, video, and newsletter described above were made after entry and extension of the Gag Order. They refer to Patrick Bryant and Eric Bowman by name, accuse them of serious criminal acts, accuse Patrick Bryant and his attorneys of misconduct, solicit “victims” and witnesses against them, and disparage judges connected to this case. They are precisely the kind of public comments about parties and persons connected to this case, and the kind of publication of materials related to this case, that the Gag Order prohibits.

31. Any suggestion that these communications are insulated because they originated from a Congressional office or from the @RepNancyMace account fails for two reasons. *First*, the Gag Order applies to “all of the above parties” and to their “agents or representatives,” and to “any” form of communication. It is not limited to speech in a “personal” capacity. *Second*, these communications are public, social media statements about specific litigants and judges in this case – not legislative acts.

32. Mace’s public declaration in her newsletter that “I WILL NOT be silenced. I will fight for you” in the same communication where she attacks Patrick Bryant and his attorneys and recruits additional “victims” is direct evidence of her intent to continue speaking publicly about this litigation despite the Gag Order. Her repeated posts following entry and extension of the Order show willful disobedience, not inadvertence.

33. Furthermore, Mace’s violations undermine the Court’s ability to ensure a fair and orderly adjudication, risk tainting the jury pool, and cause ongoing reputational harm to Bryant and Bowman.

34. Civil contempt sanctions are necessary to coerce compliance and to compensate movants for the expense of enforcing the Court’s Order.

V. RELIEF REQUESTED

35. For these reasons, Patrick Bryant and Eric Bowman respectfully request that the Court:

A. Issue an Order to Show Cause directing Nancy Mace to appear and show cause why she should not be held in civil contempt for violating the Gag Order;

B. After hearing, find that Mace has willfully violated the Gag Order through:

- The November 26, 2025 X post concerning Eric Bowman's bond;
- The November 28, 2025 X thread calling to "IMPEACH ALL CORRUPT JUDGES" and "especially including those in South Carolina specifically";
- The Instagram video described in Exhibits 5 through 7;
- The December 27, 2025 X video and related posts concerning "pedophile" cases and "predators" in South Carolina; and
- The mass email newsletter titled "Rep. Nancy Mace says 2 more women accuse her ex-fiancé of abuse" and related communications from her office.

C. Order Mace to immediately cease all public communications that violate the Gag Order and to remove or cause to be removed the identified posts, videos and electronic publications to the extent within her control, and to refrain from reposting or republishing the same or substantially similar content during the pendency of the Gag Order;

D. Penalize Mace for violating this Court's Order via a significant consequence to ensure that Mace remembers this Court's current and future Orders and follows them without hesitation.³

³ Mr. Bowman would note that an extended stay in this County's fine correctional institution is an effective and lasting means for conveying the seriousness with which this Court takes its orders.

E. Impose a coercive civil fine upon Mace in an amount to be set by the Court for each violation found, and for any future violation to ensure continuing compliance with the Gag Order and any further order of this Court;

F. Enter an order of civil contempt that includes a period of incarceration to be imposed only if Mace fails to comply with the Gag Order and this Court's further directives, so that she retains the ability to purge the contempt by full compliance;

G. Require Mace to issue a corrective statement, in language approved by the Court, to the same audiences who received the identified communications, including recipients of the email newsletter and followers of the identified social media accounts, stating that she is prohibited by Court order from making further public statements about this case and that all parties are entitled to a fair adjudication in court;

H. Award Movants their reasonable attorney's fees and costs incurred in investigating these violations and bringing this Motion; and

I. Grant such other and further relief as the Court deems just and proper.

Dated: January 12, 2026

GORDON REES SCULLY MANSUKHANI LLP

By s/ Nosizi Ralephata

Nosizi Ralephata (SC Bar No. 72484)

E-Mail: nralephata@grsm.com

Matthew Gallo (SC Bar No. 107318)

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Attorneys for Patrick Bryant

KIM LAHEY AND KILLOUGH

By s/ Robert K. Merting
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3620 Pelham Rd, PMB 213
Greenville, SC 29615
Telephone: (864) 973-6688
Attorneys for Eric Bowman

FITSNENWS

EXHIBIT 1

FITSNENWS

Matthew Gallo

From: Hocker, Donald B. <dhockerj@sccourts.org>
Sent: Wednesday, November 26, 2025 2:23 PM
To: Matthew Gallo; Duda, William L.
Cc: Marybeth Mullaney; Jay Jones; Zelda Kiser; Elizabeth Morrison; Robert Merting; Nosizi Ralephata; Will Blount; Rene Dukes; Gable, Sarah M.; Joel Milliken; Michael Close; Gina Horseman; Michelle Adams; Dina Wentzell; Martina Cattles; Mary Grace Maybank; Robert Wyndham; D. Craig Brown
Subject: RE: Doe v. Bryant - Motion for Protective Order and Status of Discovery
Attachments: Berg v. Bryant Gag Order signed.pdf

See Attached

From: Matthew Gallo <mgallo@grsm.com>
Sent: Wednesday, November 26, 2025 11:13 AM
To: Hocker, Donald B. <dhockerj@sccourts.org>; Duda, William L. <bill.duda@ogletree.com>
Cc: Marybeth Mullaney <marybeth@mullaneylaw.net>; Jay Jones <jjones@gwblawfirm.com>; Zelda Kiser <zkiser@grsm.com>; Elizabeth Morrison <Elizabeth@whelanmellen.com>; Robert Merting <robert@kimandlahey.com>; Nosizi Ralephata <nralephata@grsm.com>; Will Blount <wblount@grsm.com>; Rene Dukes <rdukes@saxtonstump.com>; Gable, Sarah M. <sarah.gable@ogletreedeakins.com>; Joel Milliken <jmilliken@grsm.com>; Michael Close <michael@mullaneylaw.net>; Gina Horseman <ghorseman@gwblawfirm.com>; Michelle Adams <maadams@grsm.com>; Dina Wentzell <dwentzell@gwblawfirm.com>; Martina Cattles <mcattles@gwblawfirm.com>; Mary Grace Maybank <marygrace@wyndhamlaw.com>; Robert Wyndham <robert@wyndhamlaw.com>; D. Craig Brown <craigbrown@craigbrownlawfirm.com>
Subject: Re: Doe v. Bryant - Motion for Protective Order and Status of Discovery

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Judge Hocker, please accept the below as our monthly update on discovery:

Since our last update, Plaintiff has provided written responses to Mr. Bryant's first and second set of discovery demands. The responses confirm that Plaintiff has not seen and does not possess the video of the alleged assault. Additionally, Plaintiff produced limited non-confidential documents to Mr. Bryant's second set of discovery demands.

However, Plaintiff refuses to produce any confidential documents in response to Mr. Bryant's first or second discovery demands. Ms. Mullaney is requesting that a blanket confidentiality order be entered into by the parties prior to production of same. We have requested that Plaintiff specifically identify the confidential documents by category to be included in the Order. While Plaintiff has identified medical records which would be subject to the Order, she only vaguely references other purported confidential topics such as "text messages, photographs and videos..." without providing any specificity. Bryant's concern is that photographs and videos that Ms. Mace has publicized to the world, with Plaintiff's consent, will be labeled confidential when they are clearly not.

Additionally, Mr. Bryant is reluctant to sign the confidentiality order due to Marybeth's representation that she intends to produce in discovery "evidence that Mr. Bryant photographed other women's private parts without their knowledge or consent..." This is the subject of a pending Motion for Protective Order and production of such documents is sanctionable conduct. Mr. Bryant alleges in his Third-Party Complaint that these photographs and videos of his personal and private sex life were stolen from his cell phone by Ms. Mace and are highly irrelevant to this case (not to mention none of the women in the alleged photographs or videos have come forward or filed charges). Also, there is no way for Ms. Mullaney to know whether these women did or did not consent or have knowledge based on a photograph.

Plaintiff has not served any discovery on my client.

Finally, Mr. Bryant circulated to the parties an intent to serve a subpoena on SLED and absent any objection, we intend to serve the subpoena on December 5.

We look forward to a resolution on Mr. Bryant's Motion for Protective Order and Motion to Compel in the coming weeks.

Respectfully,
Matt

Matthew P. Gallo, Esq.
Partner
Gordon Rees Scully Mansukhani LLP
Tel: (843) 712-7906

From: Matthew Gallo <mgallo@grsm.com>

Sent: Wednesday, November 5, 2025 10:57 AM

To: Hocker, Donald B. <dhookerj@sccourts.org>; Duda, William L. <bill.duda@ogletree.com>

Cc: Marybeth Mullaney <marybeth@mullaneylaw.net>; Jay Jones <jjones@gwblawfirm.com>; Zelda Kiser <zkiser@grsm.com>; Elizabeth Morrison <Elizabeth@whelanmellen.com>; Robert Merting <robert@kimandlahey.com>; Nosizi Ralephata <nralephata@grsm.com>; Will Blount <wblount@grsm.com>; Rene Dukes <rdukes@saxtonstump.com>; Gable, Sarah M. <sarah.gable@ogletreedeadkins.com>; Joel Milliken <jmilliken@grsm.com>; Michael Close <michael@mullaneylaw.net>; Gina Horseman <ghorseman@gwblawfirm.com>; Michelle Adams <maadams@grsm.com>; Dina Wentzell <dwentzell@gwblawfirm.com>; Martina Cattles <mcattles@gwblawfirm.com>

Subject: Doe v. Bryant - Motion for Protective Order and Status of Discovery

Dear Judge Hocker:

On behalf of Defendant Patrick Bryant, we write to provide a courtesy copy of our Motion for Protective Order filed earlier today.

Per your recent Order, we are responsible for providing you with a monthly update on discovery in the matter *Doe v. Bryant et al.* On October 15, 2025, Defendant Bryant served a limited set of discovery demands (Request for Documents, Interrogatories and Request for Admissions), totaling 16 demands,

on Plaintiff. In short, these limited demands seek what evidence Plaintiff has in her possession, or has viewed, concerning the alleged assault. We expect responses and documents from Plaintiff by November 14. Because of the limited number of demands, no extensions will be granted.

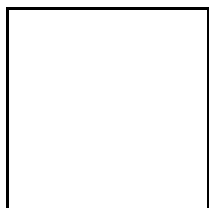
Additionally, on October 24, 2025, Defendant Bryant served a second set of discovery demands on Plaintiff. These demands are much broader and concern all allegations and claims in the case. We preemptively filed the attached Motion for Protective Order based on Marybeth's representations on the record on October 22 regarding other evidence in her possession, and to prevent Plaintiff's production of irrelevant photographs of Mr. Bryant's sex life and other personal matters.

Plaintiff has not served any discovery demands on Defendant Bryant.

Respectfully,
Matt

MATTHEW P. GALLO

Partner



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STATE OF SOUTH CAROLINA )  
 ) IN THE COURT OF COMMON PLEAS  
COUNTY OF CHARLESTON )

ALEXIS BERG )

Plaintiff )

vs. )

PATRICK BRYANT; JOHN OSBORNE;  
ERIC BOWMAN; POMMER GROUP,  
LLC; ASSIGNMENT DESK WORKS,  
LLC; GLT2, LLC )

Defendants )

ORDER  
2025-CP-10-03124

PATRICK BRYANT )

Third Party Plaintiff )

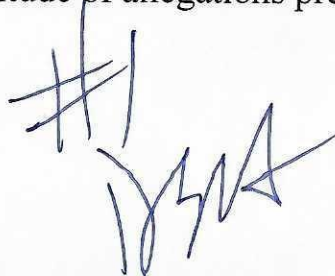
vs. )

NANCY RUTH MACE; MELISSA  
BRITTON )

Third Party Defendants )

This Court is issuing this Order ("Gag Order") completely, *sua sponte*, and not in response to a recently filed Motion for Temporary Restraining Order.

The Court is well aware of the multitude of allegations previously made and





currently being made by the parties against each other in this case. While these allegations have yet to be proven true or false in a court of law, this Court, without believing the veracity of the same, can not ignore the fact that they are being made. While everyone has the right, and will be given the right, to their day in Court, either on a temporary or permanent basis, the Court believes it needs to take some action now that will help insure that every party to this case receives a fair, just, and reasonable resolution to their respective claims, interests and concerns. This Order will be limited in duration in the anticipation of having a hearing in the near future. The Court has previously stated that it wanted to give newly-retained attorneys a chance to get up-to-speed in this case and for there to be legal briefing.

Accordingly, it is

**HEREBY ORDERED THAT:**

1. All of the above parties, any agents or representatives on behalf of the LLCs, or any of the attorneys for the above parties are enjoined and restrained from:

- a. Making or publishing any comment about any aspect of this case (other than Attorney/Client) via oral, written, social media, text or

A handwritten signature in blue ink, appearing to be "JWA", with a large "#2" written above it.



any other forms of communication;

- b. Making or publishing any comment about any party or attorney to this case or anyone connected to this case to any person, entity or otherwise (other than Attorney/Client) via oral, written, social media, text or any other forms of communication;
- c. Publishing, transmitting, posting or sharing any documents, videos, photographs or any other materials related to any aspect of this case and/or party and/or attorney and/or any person connected to this case to any person, entity, or otherwise (other than Attorney/Client).

2. The duration of this Order is three(s) weeks from date of this Order but can be extended by Order of this Court;

3. That the Court, in anticipation of some First Amendment argument, would welcome briefing, during this interim period of time, on the issue of a Gag Order vs. First Amendment rights.

4. That the attorneys in this case shall immediately provide their respective clients with a copy of this Order.

#3  
10/5/15

SO ORDERED.



DONALD B. HOCKER

Date: 11-26-25

Laurens, South Carolina

-4-



# EXHIBIT 2

FITSNENWS

**Matthew Gallo**

**From:** Hocker, Donald B. <dhockerj@sccourts.org>  
**Sent:** Thursday, December 18, 2025 10:51 AM  
**To:** Nosizi Ralephata; Robert Merting; Marybeth Mullaney  
**Cc:** Mary Grace Maybank; Matthew Gallo; William L. Duda; Jay Jones; Zelda Kiser; Elizabeth Morrison; Will Blount; Rene Dukes; Sarah M. Gable; Joel Milliken; Michael Close; Gina Horseman; Michelle Adams; Dina Wentzell; Martina Cattles; Robert Wyndham; D. Craig Brown; Whitsett, Adam; Bennett Kesler  
**Subject:** RE: Doe v. Bryant - Motion for Protective Order and Status of Discovery

All: I believe that the Gag Order is about to expire. Please allow this email to serve as my Order extending the Gag Order indefinitely until there is a ruling, one way or the other, on Bryant's Motion for a TRO/Injunction. If anyone feels a need to have this in a formal Order please feel free to prepare one. (dbh)

**From:** Nosizi Ralephata <nralephata@grsm.com>  
**Sent:** Tuesday, December 16, 2025 5:55 PM  
**To:** Robert Merting <robert@kimandlahey.com>; Marybeth Mullaney <marybeth@mullaneylaw.net>; Hocker, Donald B. <dhockerj@sccourts.org>  
**Cc:** Mary Grace Maybank <MaryGrace@wyndhamlaw.com>; Matthew Gallo <mgallo@grsm.com>; William L. Duda <bill.duda@ogletree.com>; Jay Jones <jjones@gwblawfirm.com>; Zelda Kiser <zkiser@grsm.com>; Elizabeth Morrison <Elizabeth@whelanmellen.com>; Will Blount <wblount@grsm.com>; Rene Dukes <rdukes@saxtonstump.com>; Sarah M. Gable <sarah.gable@ogletreedeakins.com>; Joel Milliken <jmilliken@grsm.com>; Michael Close <michael@mullaneylaw.net>; Gina Horseman <ghorseman@gwblawfirm.com>; Michelle Adams <maadams@grsm.com>; Dina Wentzell <dwentzell@gwblawfirm.com>; Martina Cattles <mcattles@gwblawfirm.com>; Robert Wyndham <Robert@wyndhamlaw.com>; D. Craig Brown <craigbrown@craigbrownlawfirm.com>; Whitsett, Adam <awhitsett@sled.sc.gov>; Bennett Kesler <bennett@mullaneylaw.net>  
**Subject:** Re: Doe v. Bryant - Motion for Protective Order and Status of Discovery

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good evening Judge Hocker, not to sound like a broken record, but, first: we need a status conference to address Marybeth's repeated refusal to include all counsel on critical communications relevant to all parties despite multiple requests, thereby creating confusion and misstatements as to what has been resolved (we too want our Motion to Quash the Britton Subpoena heard). We have requested multiple times in writing that she include all counsel of record on key communications and she continues to cherry pick who she gives relevant and overlapping information to and when.

In addition, it is clear that counsel for Alexis Berg is attempting to use the specter of a Second Amended Complaint to hold the December 30th motions hearing – and the progress of these cases – hostage. It is a delay tactic to avoid Bryant's Motions to Dismiss and to Strike and the progress of discovery. Due to Alexis Berg's testimony yesterday, it is apparent she has not actually discovered any new information that can justify a Second Amended Complaint, and any such amendment would be futile. **Specifically, Alexis Berg testified that she has never seen the key evidence she has alleged exists despite requesting it from Nancy Mace and Melissa Britton: the video of an assault and Melissa Britton's email documenting the same. She even admitted that she has not spoken directly with Melissa**

**Britton – her only potential witness!** The only possible evidence in Plaintiff's possession of any activity are two photographs of Berg embracing Jon Osborne on the couch, with Patrick Bryant and Eric Bowman on their phones, plainly not recording Berg's activity (which directly contradicts counsel for Berg's representations to the Court at the October 22nd hearing that the photographs showed Berg being filmed by Bryant and Bowman). Berg could barely latch onto her claim that SLED might be in possession of actual evidence to back up her claims. Such theoretical (imaginary?) evidence cannot serve as the basis for a first, second, or third amended complaint. In other words, it doesn't matter how Marybeth dices and slices the pie; we end up in the same place: neither she nor Ms. Berg ever saw the alleged sexual assault video or the original email that Ms. Britton allegedly authored the morning of the alleged assault, nor do they have evidence of Bryant filming an "unconscious" Ms. Berg.

This brings us to the unusual and improper step Berg's counsel took by copying SLED's general counsel on an email chain for the purpose of coordinating an attempt to quash Bryant's subpoena to SLED. Why is a Plaintiff's counsel, who has **NO evidence to prove that Bryant engaged in criminal conduct** now (7 months after filing the lawsuit) ostensibly seeking to find some iota of information to keep the flailing claims ongoing, attempting to prevent the one party in possession of the potential evidence (again, Berg's testimony) from producing the evidence? Why is SLED, a government organization subject to strict, constitutional obligations, coordinating with a "victim" of a "crime" for which no one has been charged after over two years of investigation, to block production of the evidence (which would be beneficial to the alleged "victim"/ Ms. Berg)?

We cannot fully comment on SLED's grounds for its motion to quash because the motion has not yet been filed, but there is no dispute that SLED's position deprives Patrick Bryant and the other Defendants of their due process rights. SLED's "victim" is actively accusing the Defendants of being sexual criminals/rapists. SLED is coordinating with Berg's counsel to deny the Defendants potentially exculpatory evidence. Were SLED to charge the Defendants with crimes, they would plainly be legally entitled to the evidence for and against them. But here, SLED by its two years of apparent inaction is allowing Plaintiff to in effect charge Defendants with crimes while SLED continues to withhold all evidence. Such an arrangement is horribly unjust and constitutionally dubious. It also is a strong indication that there is not actually any evidence of criminal activity by Bryant and the Defendants.

Alexis Berg should be eager to obtain any potential evidence of her claims that are in SLED's possession. Why is her counsel attempting to prevent its production if not to delay this case? Why is she seeking to delay this case? Delay is not in the best interests of Alexis Berg. Delay is only the interests of Nancy Mace, who will go back to labeling the Defendants criminals as soon as the gag order expires, and who wants to continue using the baseless criminal allegations to further her campaign for Governor. Likewise, SLED's silence or refusal to produce incriminating or (exculpating) evidence which would provide Ms. Berg with the justice that she seeks in this case is a tacit endorsement of the ongoing accusations of criminal conduct while depriving Bryant the opportunity to exonerate himself from these heinous accusations that he has now been forced to endure for almost a year.

Again, this case is easily resolved: if SLED or Ms. Britton have unaltered, verifiable original videos or emails documenting the assault, production of these will put an end to these claims and allow Ms. Berg the justice and peace of mind she deserves.

Sincerely,

# EXHIBIT 3

FITSNENWS





**Rep. Nancy Mace**    
@RepNancyMace

X.com

Not nearly enough. Very concerned for the safety of his victims. Keeping them in my prayers tonight. 🙏🙏🙏



**Michael Allison** @mallisontv · 1d

BREAKING: Eric Bowman has been granted bond on his domestic violence and harassment charges, 60k each.

6:43 PM · 11/26/25 · **18K** Views



20



28



158



1



Share this post with anyone, even if they aren't on X yet



# EXHIBIT 4

FITSNENWS





## Post

Reply



**Rep. Nancy Mace** 



@RepNancyMace



Especially including those in South Carolina - SPECIFICALLY



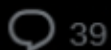
**Rep. Nancy Mace** 



@RepNancyMace · 1h

IMPEACH ALL CORRUPT JUDGES

11:00 AM · Nov 28, 2025 · **9,232** Views



39



38



231



Post your reply

Reply

# EXHIBIT 5

FITSNENWS

**Joel Milliken**

**From:** Robert Merting <robert@kimandlahey.com>  
**Sent:** Monday, December 29, 2025 5:22 PM  
**To:** Hocker, Donald B.  
**Cc:** Rene Dukes; Matthew Gallo; Nosizi Ralephata; Marybeth Mullaney; Mary Grace Maybank; William L. Duda; Jay Jones; Zelda Kiser; Elizabeth Morrison; Will Blount; Sarah M. Gable; Joel Milliken; Michael Close; Gina Horseman; Michelle Adams; Dina Wentzell; Martina Cattles; Robert Wyndham; D. Craig Brown; Bennett Kesler  
**Subject:** Re: Doe v. Bryant - Response and Opposition to Berg's Motion for Entry of Confidentiality Order  
**Attachments:** 20251228.Mace\_instagram.mp4

Judge Hocker,

I too do not use social media. However, I was able to find a way to download. Please find the video attached.

My time estimation was wrong. The relevant clip is at 1:29 to 1:40. Listening closely to the clip, Ms. Mace may be referring to Your Honor directly when she says: "My first time seeing him since I went to a hearing where he put Eric Bowman behind bars without bond for beating his wife."

Let us discuss tomorrow.

Sincerely,

Robert Merting | Attorney  
 Kim, Lahey & Killough Law Firm  
 3620 Pelham Road, PMB #213 | Greenville, SC 29615  
 864.973.6688 (O) | 843-830-5227 (M) | [Firm Website](#)



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On Dec 29, 2025, at 10:20 AM, Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)> wrote:

Robert: I have no problem at least having a discussion of whether to hear the matter tomorrow or decide to schedule a hearing in the future. Without a formal written Order/Rule to Show Cause, filed and served, it may be difficult to hold a contempt hearing tomorrow. I am open to discussion. I am unable to pull up a social media post on my judicial department issued

computer. Too, I do not do social media. So either tomorrow or some other appropriate time it will need to be provided to the court in another format. (dbh)

**From:** Robert Merting <[robert@kimandlahey.com](mailto:robert@kimandlahey.com)>

**Sent:** Monday, December 29, 2025 9:52 AM

**To:** Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)>

**Cc:** Rene Dukes <[rdukes@saxtonstump.com](mailto:rdukes@saxtonstump.com)>; Matthew Gallo <[mgallo@grsm.com](mailto:mgallo@grsm.com)>; Nosizi Ralephata <[nralephata@grsm.com](mailto:nralephata@grsm.com)>; Marybeth Mullaney <[marybeth@mullaneylaw.net](mailto:marybeth@mullaneylaw.net)>; Mary Grace Maybank <[MaryGrace@wyndhamlaw.com](mailto:MaryGrace@wyndhamlaw.com)>; William L. Duda <[bill.duda@ogletree.com](mailto:bill.duda@ogletree.com)>; Jay Jones <[jjones@gwblawfirm.com](mailto:jjones@gwblawfirm.com)>; Zelda Kiser <[zkiser@grsm.com](mailto:zkiser@grsm.com)>; Elizabeth Morrison <[Elizabeth@whelanmellen.com](mailto:Elizabeth@whelanmellen.com)>; Will Blount <[wblount@grsm.com](mailto:wblount@grsm.com)>; Sarah M. Gable <[sarah.gable@ogletreedeakins.com](mailto:sarah.gable@ogletreedeakins.com)>; Joel Milliken <[jmilliken@grsm.com](mailto:jmilliken@grsm.com)>; Michael Close <[michael@mullaneylaw.net](mailto:michael@mullaneylaw.net)>; Gina Horseman <[ghorseman@gwblawfirm.com](mailto:ghorseman@gwblawfirm.com)>; Michelle Adams <[maadams@grsm.com](mailto:maadams@grsm.com)>; Dina Wentzell <[dwentzell@gwblawfirm.com](mailto:dwentzell@gwblawfirm.com)>; Martina Cattles <[mcattles@gwblawfirm.com](mailto:mcattles@gwblawfirm.com)>; Robert Wyndham <[Robert@wyndhamlaw.com](mailto:Robert@wyndhamlaw.com)>; D. Craig Brown <[craigbrown@craigbrownlawfirm.com](mailto:craigbrown@craigbrownlawfirm.com)>; Bennett Kesler <[bennett@mullaneylaw.net](mailto:bennett@mullaneylaw.net)>

**Subject:** Re: Doe v. Bryant - Response and Opposition to Berg's Motion for Entry of Confidentiality Order

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Thank you Judge Hocker.

Would the Court be willing to address a violation of the Gag Order tomorrow?

Despite your Order of 11-26-25, which you extended via email instructions, Ms. Mace continues to defame my client. Yesterday, in a video posting on Instagram, she called Mr. Bowman, by name, a wife beater. She also associated his name with pedophiles implying behavior by him that has not even been alleged.

The video of the incident is here. I apologize there is no counter indicator to say where in the video she makes the statement. However, it is 30 to 60 seconds in and Ms. Mace refers to Mr. Bowman by his full name.

<https://www.instagram.com/repnancymace/reel/DSyoe3KAUF7/>

I know you have requested Motions to address other items. However, the timing of this incident and the incident being a violation of a Court Order seems appropriate for the Court to Issue a Rule to Show Cause and address tomorrow.

Sincerely,

Robert Merting | Attorney

Kim, Lahey & Killough Law Firm

3620 Pelham Road, PMB #213 | Greenville, SC 29615

864.973.6688 (O) | 843-830-5227 (M) | [Firm Website](#)

<image001.png>

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On Dec 28, 2025, at 2:10 PM, Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)> wrote:

Robert: Thanks for the reminder. Courtroom 3B. (dbh)

---

**From:** Robert Merting <[robert@kimandlahey.com](mailto:robert@kimandlahey.com)>  
**Sent:** Sunday, December 28, 2025 10:57 AM  
**To:** Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)>  
**Cc:** Rene Dukes <[rdukes@saxtonstump.com](mailto:rdukes@saxtonstump.com)>; Matthew Gallo <[mgallo@grsm.com](mailto:mgallo@grsm.com)>; Nosizi Ralephata <[nralephata@grsm.com](mailto:nralephata@grsm.com)>; Marybeth Mullaney <[marybeth@mullaneylaw.net](mailto:marybeth@mullaneylaw.net)>; Mary Grace Maybank <[MaryGrace@wyndhamlaw.com](mailto:MaryGrace@wyndhamlaw.com)>; William L. Duda <[bill.duda@ogletree.com](mailto:bill.duda@ogletree.com)>; Jay Jones <[jjones@gwblawfirm.com](mailto:jjones@gwblawfirm.com)>; Zelda Kiser <[zkiser@grsm.com](mailto:zkiser@grsm.com)>; Elizabeth Morrison <[Elizabeth@whelanmellen.com](mailto:Elizabeth@whelanmellen.com)>; Will Blount <[wblount@grsm.com](mailto:wblount@grsm.com)>; Sarah M. Gable <[sarah.gable@ogletreedeakins.com](mailto:sarah.gable@ogletreedeakins.com)>; Joel Milliken <[jmilliken@grsm.com](mailto:jmilliken@grsm.com)>; Michael Close <[michael@mullaneylaw.net](mailto:michael@mullaneylaw.net)>; Gina Horseman <[ghorseman@gwblawfirm.com](mailto:ghorseman@gwblawfirm.com)>; Michelle Adams <[maadams@grsm.com](mailto:maadams@grsm.com)>; Dina Wentzell <[dwentzell@gwblawfirm.com](mailto:dwentzell@gwblawfirm.com)>; Martina Cattles <[mcattles@gwblawfirm.com](mailto:mcattles@gwblawfirm.com)>; Robert Wyndham <[Robert@wyndhamlaw.com](mailto:Robert@wyndhamlaw.com)>; D. Craig Brown <[craigbrown@craigbrownlawfirm.com](mailto:craigbrown@craigbrownlawfirm.com)>; Bennett Kesler <[bennett@mullaneylaw.net](mailto:bennett@mullaneylaw.net)>  
**Subject:** Re: Doe v. Bryant - Response and Opposition to Berg's Motion for Entry of Confidentiality Order

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Judge Hocker,

Because I am a bit new to the case, and not to be dense, I wanted to verify the court room. I understand this will be held at the Charleston County Judicial Center (100 Broad St, Charleston SC). Do we know which court room?

Thanks,

Robert Merting | Attorney  
 Kim, Lahey & Killough Law Firm  
 3620 Pelham Road, PMB #213 | Greenville, SC 29615  
 864.973.6688 (O) | 843-830-5227 (M) | [Firm Website](http://www.kimlaheykillough.com)

<image001.png>

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On Dec 27, 2025, at 4:03 PM, Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)> wrote:

Rene: Evidently these two recent Motions have not reached my Queue yet so would not be on the list that I emailed yesterday. The Berg and Britton's Motions to Dismiss on that list may be old. I do not know. I came across two more Motions which I have

added to the updated list attached—Bryant Motion for PO and Berg Motion to dismiss Bryant’s Counterclaims. Hopefully we will be able to figure things out. (dbh)

---

**From:** Rene Dukes <[rdukes@saxtonstump.com](mailto:rdukes@saxtonstump.com)>  
**Sent:** Friday, December 26, 2025 1:31 PM  
**To:** Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)>; Matthew Gallo <[mgallo@grsm.com](mailto:mgallo@grsm.com)>; Nosizi Ralephata <[nralephata@grsm.com](mailto:nralephata@grsm.com)>; Robert Merting <[robert@kimandlahey.com](mailto:robert@kimandlahey.com)>; Marybeth Mullaney <[marybeth@mullaneylaw.net](mailto:marybeth@mullaneylaw.net)>  
**Cc:** Mary Grace Maybank <[MaryGrace@wyndhamlaw.com](mailto:MaryGrace@wyndhamlaw.com)>; William L. Duda <[bill.duda@ogletree.com](mailto:bill.duda@ogletree.com)>; Jay Jones <[jjones@gwblawfirm.com](mailto:jjones@gwblawfirm.com)>; Zelda Kiser <[zkiser@grsm.com](mailto:zkiser@grsm.com)>; Elizabeth Morrison <[Elizabeth@whelanmellen.com](mailto:Elizabeth@whelanmellen.com)>; Will Blount <[wblount@grsm.com](mailto:wblount@grsm.com)>; Sarah M. Gable <[sarah.gable@ogletreedeakins.com](mailto:sarah.gable@ogletreedeakins.com)>; Joel Milliken <[jmilliken@grsm.com](mailto:jmilliken@grsm.com)>; Michael Close <[michael@mullaneylaw.net](mailto:michael@mullaneylaw.net)>; Gina Horseman <[ghorseman@gwblawfirm.com](mailto:ghorseman@gwblawfirm.com)>; Michelle Adams <[maadams@grsm.com](mailto:maadams@grsm.com)>; Dina Wentzell <[dwentzell@gwblawfirm.com](mailto:dwentzell@gwblawfirm.com)>; Martina Cattles <[mcattles@gwblawfirm.com](mailto:mcattles@gwblawfirm.com)>; Robert Wyndham <[Robert@wyndhamlaw.com](mailto:Robert@wyndhamlaw.com)>; D. Craig Brown <[craigbrown@craigbrownlawfirm.com](mailto:craigbrown@craigbrownlawfirm.com)>; Bennett Kesler <[bennett@mullaneylaw.net](mailto:bennett@mullaneylaw.net)>  
**Subject:** RE: Doe v. Bryant - Response and Opposition to Berg’s Motion for Entry of Confidentiality Order

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Your Honor,

Marybeth filed her Motion to Dismiss the Second Amended Third Party Complaint on Wednesday, December 24<sup>th</sup>, and Mary Grace did not serve her Motion to Dismiss until today. I don’t believe they can timely be heard on the 30<sup>th</sup> and would ask that they be set for another day, as it would be impossible for me to prepare a return to either by then.

Thank you.

Rene

**Rene Stuhr Dukes** | Shareholder

<image001.png>

151 Meeting Street, Suite 400

Charleston, SC 29401

Phone: 843.386.4885 | Internal: 1325

Fax: 843.580.8303

[rdukes@saxtonstump.com](mailto:rdukes@saxtonstump.com)

[www.saxtonstump.com](http://www.saxtonstump.com)

<image002.png> <image003.png> <image004.png>

**From:** Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)>  
**Sent:** Friday, December 26, 2025 1:01 PM  
**To:** Matthew Gallo <[mgallo@grsm.com](mailto:mgallo@grsm.com)>; Nosizi Ralephata <[nralephata@grsm.com](mailto:nralephata@grsm.com)>; Rene Dukes <[rdukes@saxtonstump.com](mailto:rdukes@saxtonstump.com)>; Robert Merting <[robert@kimandlahey.com](mailto:robert@kimandlahey.com)>; Marybeth Mullaney <[marybeth@mullaneylaw.net](mailto:marybeth@mullaneylaw.net)>  
**Cc:** Mary Grace Maybank <[MaryGrace@wyndhamlaw.com](mailto:MaryGrace@wyndhamlaw.com)>; William L. Duda <[bill.duda@ogletree.com](mailto:bill.duda@ogletree.com)>; Jay Jones <[jjones@gwblawfirm.com](mailto:jjones@gwblawfirm.com)>; Zelda Kiser <[zkiser@grsm.com](mailto:zkiser@grsm.com)>; Elizabeth Morrison <[Elizabeth@whelanmellen.com](mailto:Elizabeth@whelanmellen.com)>; Will Blount <[wblount@grsm.com](mailto:wblount@grsm.com)>; Sarah M. Gable <[sarah.gable@ogletreedeakins.com](mailto:sarah.gable@ogletreedeakins.com)>; Joel Milliken <[jmilliken@grsm.com](mailto:jmilliken@grsm.com)>; Michael Close <[michael@mullaneylaw.net](mailto:michael@mullaneylaw.net)>; Gina Horseman <[ghorseman@gwblawfirm.com](mailto:ghorseman@gwblawfirm.com)>; Michelle Adams <[maadams@grsm.com](mailto:maadams@grsm.com)>; Dina Wentzell <[dwentzell@gwblawfirm.com](mailto:dwentzell@gwblawfirm.com)>; Martina Cattles <[mcattles@gwblawfirm.com](mailto:mcattles@gwblawfirm.com)>; Robert Wyndham <[Robert@wyndhamlaw.com](mailto:Robert@wyndhamlaw.com)>; D. Craig Brown <[craigbrown@craigbrownlawfirm.com](mailto:craigbrown@craigbrownlawfirm.com)>; Bennett Kesler <[bennett@mullaneylaw.net](mailto:bennett@mullaneylaw.net)>  
**Subject:** RE: Doe v. Bryant - Response and Opposition to Berg's Motion for Entry of Confidentiality Order

All: Attached please find a list of what I understand will be the Motions (not listed in any order) to be heard on December 30<sup>th</sup>. Please advise if the list is not correct. Also, I still need (I believe it will be Nosi and Marybeth) for a preferred order for the Motions to be heard. My list has 14 Motions. Please be reminded I am encouraging all lawyers to exercise some brevity in making argument on the 30<sup>th</sup>. I look forward to seeing everyone then. (dbh)

**From:** Matthew Gallo <[mgallo@grsm.com](mailto:mgallo@grsm.com)>  
**Sent:** Tuesday, December 23, 2025 8:43 AM  
**To:** Nosizi Ralephata <[nralephata@grsm.com](mailto:nralephata@grsm.com)>; Rene Dukes <[rdukes@saxtonstump.com](mailto:rdukes@saxtonstump.com)>; Hocker, Donald B. <[dhockerj@sccourts.org](mailto:dhockerj@sccourts.org)>; Robert Merting <[robert@kimandlahey.com](mailto:robert@kimandlahey.com)>; Marybeth Mullaney <[marybeth@mullaneylaw.net](mailto:marybeth@mullaneylaw.net)>  
**Cc:** Mary Grace Maybank <[MaryGrace@wyndhamlaw.com](mailto:MaryGrace@wyndhamlaw.com)>; William L. Duda <[bill.duda@ogletree.com](mailto:bill.duda@ogletree.com)>; Jay Jones <[jjones@gwblawfirm.com](mailto:jjones@gwblawfirm.com)>; Zelda Kiser <[zkiser@grsm.com](mailto:zkiser@grsm.com)>; Elizabeth Morrison <[Elizabeth@whelanmellen.com](mailto:Elizabeth@whelanmellen.com)>; Will Blount <[wblount@grsm.com](mailto:wblount@grsm.com)>; Sarah M. Gable <[sarah.gable@ogletreedeakins.com](mailto:sarah.gable@ogletreedeakins.com)>; Joel Milliken <[jmilliken@grsm.com](mailto:jmilliken@grsm.com)>; Michael Close <[michael@mullaneylaw.net](mailto:michael@mullaneylaw.net)>; Gina Horseman <[ghorseman@gwblawfirm.com](mailto:ghorseman@gwblawfirm.com)>; Michelle Adams <[maadams@grsm.com](mailto:maadams@grsm.com)>; Dina Wentzell <[dwentzell@gwblawfirm.com](mailto:dwentzell@gwblawfirm.com)>; Martina Cattles <[mcattles@gwblawfirm.com](mailto:mcattles@gwblawfirm.com)>; Robert Wyndham <[Robert@wyndhamlaw.com](mailto:Robert@wyndhamlaw.com)>; D. Craig Brown <[craigbrown@craigbrownlawfirm.com](mailto:craigbrown@craigbrownlawfirm.com)>; Bennett Kesler <[bennett@mullaneylaw.net](mailto:bennett@mullaneylaw.net)>  
**Subject:** Doe v. Bryant - Response and Opposition to Berg's Motion for Entry of Confidentiality Order

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Dear Judge Hocker, we write to provide you with a filed copy of Patrick Bryant's response and opposition to Alexis Berg's Motion for Entry of Confidentiality Order.

Additionally, Exhibit C (a recording of the initial telephone call between Nancy Mace and Alexis Berg) was too large to file, so we are attaching a copy hereto. There is nothing confidential about this recording. This recording is relevant not only to this motion but every motion to be heard on December 30 as it exposes Nancy Mace's motives. With your permission, we would like to play parts of the recording at the upcoming hearing. Also, we are awaiting an authentic transcription of the 44-minute call and hope to provide a copy prior to the December 30 hearing.

Finally, there is a dispute as to the confidential designation of Exhibit B – two photographs taken on October 25-26, 2018. As we await a ruling from Your Honor at the upcoming hearing, we have not annexed them to our public filing and attach them hereto.

Have a wonderful holidays.

Respectfully,  
Matt

---

**MATTHEW P. GALLO**  
Partner

<image005.jpg>

**GORDON REES SCULLY MANSUKHANI**  
**YOUR 50 STATE LAW FIRM™**  
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<BERG V. BRYANT MOTION DEC 30.docx>

FITSNENWS

EXHIBIT 6

FITSNENWS

EXHIBIT 7

FITSNENWS

(0:00 - 2:40)

You know, South Carolina has a pedophile problem. I mean, that much is very clear. When you have an attorney general who lets off 92.5 percent of pedophile cases and charges in just one county and refuses to give you statewide information, you know there's a there's a problem here with pedophiles running wild throughout South Carolina.

So number one, I want to thank the South County U.S. Attorney Brian Sterling, U.S. Attorney Limehouse, who was here this morning, the investigators who worked through the investigation. This is tough stuff, what they have to review and look at, but what the feds have done to come in and apprehend him, the judge did today without not letting him out without without bond, that he's going to be behind bars. Those are all good things for South Carolina, so I want to acknowledge the hard work that went into this.

And I'm grateful too today that this case isn't in the hands of a solicitor, local solicitor or attorney general right now. I'm grateful that the feds have stepped in and done the right thing and that the process is working, but the other thing I want to acknowledge today is why isn't every alleged pedophile treated like this? Why aren't they all behind bars? Why is it because this is a high profile case with a high profile local individual, the case is getting so much attention? There are hundreds if not thousands of other cases, other charges of alleged pedophiles who've been let out, who are running throughout South Carolina because we're a haven for pedophiles and they're not and they're not in jail and they're not being prosecuted. There are no trials.

My first time seeing him since I went to a hearing where he put Eric Bowman behind bars without bond for beating his wife as a wife beater, but I'm deeply concerned for any child who may have been in the vicinity or in his home or near him or with him alone. So I'm encouraging them to reach out to office at mace.house.gov and ensure that you're getting everything that you need, that you have a victim's rights advocate. One of the things I learned going through the system was the lack of rights that are respected even though they're law for potential victims of abuse.

And so I want to make sure that they know what their rights are, that they are being attended to and that their rights are being protected. But I want the letter of the law to be applied to everybody who breaks it and that's why this case is important to pay attention to. And what I've done with the pedophile cases in Dorchester County, I have asked the Attorney General for the statewide data on all the pedophiles he's let out of jail and he won't provide the information because he's embarrassed by it, he's ashamed.

He let off 92.5 percent of pedophiles in Dorchester County. They walked free. Those charges were gone.

They were erased. I believe that child rapists should be, should receive the death penalty in South Carolina.

EXHIBIT 8

FITSNENWS



"I don't know what's worse: Finding all this evidence or turning in a loved one," said **Congresswoman Mace** in a video statement. "Each new allegation, more disturbing than the last."

The allegations against Bryant include purported child sexual exploitation material, multiple rape accusations, and hidden cameras used to film women without their knowledge or consent.

"Patrick Bryant and his attorneys continue to harass his victims for doing what's right," **Mace continued.** "I WILL NOT be silenced. I will fight for you."

Call to Action for Victims and Witnesses

Congresswoman Mace is urging anyone who believes they may have been victimized by Patrick Bryant or who has information relevant to ongoing investigations to come forward immediately.

Individuals can reach out to Congresswoman Mace's official federal office at:
mace.house.gov/contact

The office will:

- Provide victims contact information for law enforcement investigators, including SLED (South Carolina Law Enforcement Division) - if they wish to report it to the appropriate authorities
- Connect victims with appropriate resources and support services
- Handle all communications discreetly and with the utmost sensitivity

"If you have information, come forward. We will protect you," said Mace.

Since uncovering evidence related to these allegations, Congresswoman Mace has drafted more than a dozen bills aimed at protecting women and children from sexual exploitation and abuse.



➞ Forward

EXHIBIT 9

FITSNEWS



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**Rep. Nancy Mace**

@RepNancyMace

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When your state Attorney General drops nearly every case and/or charge against p*dos, that's when you know your state is a p*dophile paradise.

**Rep. Nancy ...**

@RepNancy... · Dec 27, 2025

South Carolina has a serious problem, and we can't keep looking the other way.

When 92.5% of pedophile cases in a single county are let go, and statewide data is withheld, predators are ...

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No matter what you say @RepNancyMace it's hollow because you have spent most of your time

