

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

ALEX BERG

Plaintiff,

v.

CASE NO.: 2025CP1003124

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

Defendants

FILED

JAN 23 2026

JULIE J. ARMSTRONG
CLERK, C.P. & G.S.

PATRICK BRYANT

Third Party Plaintiff,

v.

NANCY RUTH MACE; MELISSA BRITTON

Third Party Defendants

PLEASE TAKE NOTICE that I, The Honorable Representative Nancy R. Mace (“Rep. Mace”),
in the above-captioned matter file pro se a letter to Ms. Marybeth Mullaney in Court of Common
Pleas in the Ninth Judicial Circuit.

Dated: January 23, 2025

Respectfully Submitted,



/s/ Signature
Rep. Nancy R. Mace

Pro Se
295 Seven Farms Drive, Suite C-186
Charleston, SC 29492

843.475.9139, nancy@nancymace.org

THE HONORABLE NANCY R. MACE
MEMBER OF CONGRESS

900 Island Park Drive, Suite 260
Charleston, SC 29492

January 22, 2026

VIA EMAIL

Marybeth Mullaney
Mullaney Law Firm
652 Rutledge Avenue
Charleston, SC 29403

RE: Alexis Berg v. Patrick Bryant - Unauthorized Acquisition, Use, and Disclosure of Privileged Materials

Dear Ms. Mullaney:

I am writing to express grave concerns regarding your unauthorized acquisition, use, and disclosure of **privileged** documents and materials that are protected by multiple legal privileges, including the common interest privilege, the work product doctrine, attorney-client privilege, and law enforcement investigative privilege. It has come to my attention that you have downloaded highly sensitive, privileged information that was shared with you for specific, limited purposes, and that you have now **repeatedly** disclosed privileged communications between potential **crime victims** to adverse third parties in discovery.

The Limited Purpose for Which Materials Were Shared

I shared information and materials with you for two specific and limited purposes:

First, you represented that you intended to pursue a class action lawsuit on behalf of multiple victims of Mr. Bryant, to include myself. I shared information with you in reliance on that representation, for the purpose of supporting a joint legal effort on behalf of multiple victims. That information was shared in confidence, subject to attorney-client privilege and the common interest doctrine, and was not authorized for any other use.

Second, I shared information with you to assist with and support the ongoing SLED criminal investigation. Materials provided for the purpose of cooperating with law enforcement are protected by the law enforcement investigative privilege and were not authorized for disclosure to adverse parties in civil litigation.

You have violated the trust placed in you and exceeded the scope of the limited purposes for which these materials were shared. **You have violated your duty to protect victims. You have violated your oath to the Constitution to the great state of South Carolina.**

Unauthorized Acquisition of Privileged Materials

You have obtained and are now in possession of materials that include:

- Private images of me taken without my knowledge or consent;
- Private video diaries containing deeply personal content;
- Confidential medical information regarding my PTSD diagnosis and treatment;
- Private communications between victims; and
- Private communication with and/or regarding my underage children;
- Private communication with one or more targets of an investigation;
- Other highly sensitive personal information.

You had no right to use these materials for purposes other than those for which they were shared. You had no right to disclose them to adverse parties. And you had no right to produce them in discovery in litigation adverse to me or to other victims.

Disclosure of Privileged Victim Communications to Adverse Parties

Most egregiously, I have learned that you have shared text message communications between victims with adverse third parties in discovery. This conduct is unconscionable and constitutes a flagrant violation of multiple privileges.

Communications between victims who share a common legal interest, including victims cooperating with each other and with law enforcement to pursue criminal prosecution of their abusers, **are privileged**. These communications were made in confidence for the purpose of pursuing a joint legal strategy against the individuals who victimized us. By disclosing these communications to Mr. Bryant and his counsel, you have:

- Violated the common interest privilege that protected those communications;
- Provided the accused predator with insight into victim cooperation;
- Exposed victims to potential retaliation and intimidation;
- Compromised the integrity of the ongoing SLED investigation and possible federal investigation(s); and
- Potentially provided Mr. Bryant with ammunition to further harass and target victims through additional abusive litigation.

Mr. Bryant has already demonstrated, as found by the Honorable Judge Rode, that he will weaponize any information he obtains to target and intimidate accusers. Bryant literally created shell companies and issued unauthorized subpoenas for the express purpose of

identifying victims and to ascertain the status of the SLED investigation. A common practice of alleged criminals use to circumvent the justice process by weaponizing the civil justice system. And now, despite being informed of your obligations and duties owed, you have handed him privileged communications between the very women he victimized. And he has already weaponized communication between victims in his most recent affidavit filed with the Court on January 21, 2026.

Applicable Privileges

The materials you have obtained and disclosed are protected by multiple legal privileges:

Attorney-Client Privilege. To the extent I shared information with you in your capacity as an attorney representing victim(s), including in connection with your proposed class action, those communications are protected by attorney-client privilege. You were not authorized to disclose attorney-client privileged communications to adverse parties.

Work Product Doctrine. Materials prepared in anticipation of litigation, including documents, communications, and analysis shared for the purpose of pursuing legal claims against Mr. Bryant and others, are protected by the work product doctrine. The work product doctrine provides absolute protection for materials reflecting legal strategies, mental impressions, and litigation planning. These materials were prepared in anticipation of litigation and were not authorized for disclosure to the opposing party. **Attorneys learn this in law school prior to being accepted into the state Bar.**

Common Interest Privilege. The common interest doctrine preserves the confidentiality of communications among parties with shared legal interests, including victims cooperating with each other and with law enforcement in a criminal investigation. When multiple victims share information for the purpose of pursuing a common legal interest, those communications remain privileged and protected from disclosure to adverse parties. You have violated this privilege by disclosing victim communications to Mr. Bryant's side.

Breach of Duty to Prospective Clients and Clients. As you held yourself out as an attorney representing victim(s), including in connection with a proposed class action, you owed professional duties - sacred to the legal profession - to those you represented or purported to represent. My understanding is there is a similar breach with another victim in this case. An attorney owes her client the highest duty of loyalty, confidentiality, and good faith. By obtaining confidential information under the guise of representing victims in a joint legal effort, and then disclosing that information to the very predator accused of victimizing them, you have breached the most fundamental duties an attorney owes. **And you did this despite repeated warnings about your duties and your assurances that you would protect those victims.** Instead, you betrayed them. And you used information shared in confidence for purposes directly adverse to the interests of the persons who shared it. This is a textbook breach of your professional

obligations, and it exposes you to personal liability for any damages caused by your unauthorized disclosures.

Jeopardizing the SLED Investigation and Justice for Victims

Your conduct is actively jeopardizing the SLED investigation into the accused predators who have allegedly victimized multiple women, including your own client. SLED has been investigating Patrick Bryant and Eric Bowman since December 14, 2023. The investigation remains active and ongoing. By obtaining and disclosing materials from the investigation and privileged communications between victims:

- You are exposing witness identities, and evidence to the targets;
- You are compromising witness testimony that could be used in criminal prosecutions;
- You are providing Mr. Bryant with a roadmap to further intimidate victims and obstruct justice;
- You are undermining the criminal case.

The greatest justice for Jane Doe, and other victims, will come from successful criminal prosecution. Your egregious actions are putting that at risk.

Demand and Deadline

You have five (5) calendar days from the date of this letter to comply with the following demands:

1. Specifically identify, in writing what materials you have disclosed to adverse parties, when, and to whom;
2. Immediately cease any further review, use, or dissemination of these materials;
3. Take immediate steps to claw back any privileged materials you have improperly disclosed to adverse parties;
4. Return all copies of materials containing my private images, personal video diaries, audio recordings, medical information, communications between victims, and other personal and private data; OR provide a certified statement confirming that all such materials have been permanently destroyed; and
5. Confirm in writing that you have complied with all of the above demands.

Failure to comply with these demands within five (5) calendar days will leave me with no choice but to file a complaint with the South Carolina State Bar and/or institute civil litigation against you for violation of privilege, breach of fiduciary duty, invasion of privacy, and any other applicable claims.

I share your client's desire for justice and have been assisting in every possible way to get her justice. I have spent more than two years fighting for victims, to include your client. I have

drafted more than one dozen bills to help victims, like your client. I have turned over information to law enforcement, repeatedly, to assist your client.

But justice will not be served by handing the accused predator privileged communications between his victims. Justice will not be served by disclosing private information about my physical PTSD symptoms and private documents to adverse parties. And justice will not be served by jeopardizing the criminal investigation that could put these men behind bars.

Do not let your actions deny any woman in this case the justice they have fought so hard to obtain. Cease this conduct immediately.

I reserve all rights and remedies available to me under law. This letter is not intended to be, and shall not be construed as, a waiver of any privilege, right, or claim.

Sincerely,

A handwritten signature in black ink that reads "Nancy Mace". The signature is written in a cursive, flowing style.

The Honorable Nancy R. Mace
Member of Congress

FITSNEMNS