

# EXHIBIT

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RE: Cronin v. Cronin

Mon 4/10/2023 11:02 AM

From: Ashby Jones [ashby@kinardandjones.com](mailto:ashby@kinardandjones.com)

To: Andrew Farley [andrew@afarleylaw.com](mailto:andrew@afarleylaw.com)

Cc: Christopher J. Watkins <[chris@cc4n6.com](mailto:chris@cc4n6.com)>; Emily Looney <[emily@kinardandjones.com](mailto:emily@kinardandjones.com)>;  
ALJ Team [aljteam@kinardandjones.com](mailto:aljteam@kinardandjones.com)

I am going to need a lot more detail. You received a spoliation letter from me on February 20<sup>th</sup>.

Ashby Lawton Jones

Fellow, American Academy of Matrimonial Lawyers

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FW: Cronin v. Cronin - Spoliation

Mon 4/10/2023 1:40 PM

From: Ashby Jones [ashby@kinardandjones.com](mailto:ashby@kinardandjones.com)

To: [andrew@afarleylaw.com](mailto:andrew@afarleylaw.com)

Cc: ALJ Team <[aljteam@kinardandjones.com](mailto:aljteam@kinardandjones.com)>; Emily Looney <[emily@kinardandjones.com](mailto:emily@kinardandjones.com)>;  
Hank Burriss [Hank@burrisslaw.com](mailto:Hank@burrisslaw.com)

Andy, attached is the spoliation letter we sent on February 20<sup>th</sup>.

We have reason to believe your client disposed of evidence after receiving this letter. I am copying Mr. Cronin's criminal defense attorney with this email, as her destruction of evidence could have implications in the criminal matter.

Ashby Lawton Jones  
Fellow, American Academy of Matrimonial Lawyers  
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FW: Cronin v. Cronin

Mon 4/10/2023 1:41 PM

From: Ashby Jones <ashby@kinardandjones.com>

To: Hank Burriss <Hank@burrisslaw.com>; [andrew@afarleylaw.com](mailto:andrew@afarleylaw.com)

Cc: Emily Looney <emily@kinardandjones.com>; ALJ Team [aljteam@kinardandjones.com](mailto:aljteam@kinardandjones.com)

Andy,

The day after I sent the spoliation letter, I specifically notified you of which devices we would be analyzing.

Ashby Lawton Jones  
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RE: Cronin v. Cronin

Mon 4/10/2023 1:47 PM

From: Ashby Jones <ashby@kinardandjones.com>

To: Andrew Farley <andrew@afarleylaw.com>; Hank Burriss [Hank@burrisslaw.com](mailto:Hank@burrisslaw.com)

Cc: Christopher J. Watkins <chris@cc4n6.com>; Emily Looney <emily@kinardandjones.com>; ALJ Team [aljteam@kinardandjones.com](mailto:aljteam@kinardandjones.com)

Andy,

You have represented below that Mrs. Cronin threw out the devices I specifically requested be analyzed "before the litigation began". This is not accurate.

I am providing Hank Burriss with this email chain.

Andy, I have provided you with a call log for calls made from the iPhone 12. (See attached). The last call was made to Best Buy and on **February 21<sup>st</sup> at 5:30 PM.**

I would like you to obtain specific information about what your client did with the iPhone 12, MacBook Air, and the Ipad. I need to know when she disposed of those items, where they were disposed of, who was involved in this activity and who knew about it. If you cannot provide me with this information informally, I will notice her deposition.

Ashby Lawton Jones  
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CALL LOG FOR PHONE NUMBER 803-587-0259

AirBalMin	MsgAirDate	DispBeginT	DispBegin	Destination	Mtn	MsgDesc1
7	02/21/2023	05:30	PM	LEXINGTON	803-957-0590	SC BEST BUY   LEXINGTON, SUNSET BLVD
2	02/21/2023	04:19	PM	INCOMING	803-678-8912	CL CAROLINA TAX PRO   BROAD RIVER RD
29	02/21/2023	02:26	PM	INCOMING	803-875-1804	CL EASTOVER, SC - ?
8	02/21/2023	02:19	PM	COLUMBIA	803-312-2827	SC ROBIN VASSEY (FRIEND)
2	02/21/2023	02:17	PM	LEXINGTON	803-821-3324	SC SCHOOL NURSE AT NEW PROVIDENCE
10	02/21/2023	02:08	PM	COLUMBIA	803-312-2827	SC ROBIN VASSEY (FRIEND)
13	02/21/2023	09:25	AM	INCOMING	803-808-0365	CL ?
6	02/20/2023	05:40	PM	INCOMING	864-871-4031	CL RHONDA BURNS (mother)
3	02/20/2023	04:04	PM	INCOMING	864-871-4031	CL RHONDA BURNS (mother)
1	02/20/2023	02:30	PM	COLUMBIA	803-315-0999	SC CPA
1	02/20/2023	01:57	PM	COLUMBIA	803-457-0803	SC COLUMBIA HEARING CENTER
34	02/20/2023	01:33	PM	TOLL-FREE	833-697-7328	CL SPECTRUM
4	02/20/2023	01:10	PM	COLUMBIA	803-457-0803	SC ?
1	02/20/2023	12:57	PM	COLUMBIA	803-678-8912	SC CAROLINA TAX PRO   BROAD RIVER RD
1	02/20/2023	12:54	PM	COLUMBIA	803-315-0999	SC CPA
6	02/20/2023	12:44	PM	INCOMING	803-520-8893	CL ?
1	02/20/2023	09:02	AM	COLUMBIA	803-760-7411	SC CUMMINGS CPA
2	02/20/2023	09:01	AM	LEXINGTON	803-359-9921	SC CPA
2	02/20/2023	08:23	AM	COLUMBIA	803-457-0803	SC ?