

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

MAY 16 2024

SC Court of Appeals

G.D. Morgan, Jr., Circuit Court Judge

Perry H. Gravely, Circuit Court Judge

Circuit Court Case No.: 2020-CP-23-01450
Appellate Case No. 2022-001432

Michael Gene Putnam,.....Appellant,

v.

Robert Henry Purkerson,.....Respondent.

RECORD ON APPEAL
VOLUME-2

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APPEAL FROM GREENVILLE COUNTY
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G.D. Morgan, Jr., Circuit Court Judge

Case No. 2020-CP-23-01450

Michael Gene Putnam.....Appellant,

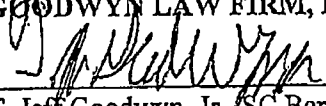
v.

Robert Henry Purkerson.....Respondent.

NOTICE OF APPEAL

Michael Gene Putnam, appeals the Order of the G. D. Morgan, Jr., Circuit Court Judge, dated September 8, 2022 denying Plaintiff's Motion to Reconsider the Order Granting Defendants' Motion for Summary Judgment dated August 17, 2022, that are attached hereto.

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October 10, 2022

STATE OF SOUTH CAROLINA
COUNTY OF Greenville
IN THE COURT OF COMMON PLEAS

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2020CP2301450

Michael Gene Putnam
PLAINTIFF(S)

Robin Cary Maples et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ JURY VERDICT. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ DECISION BY THE COURT. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ ACTION DISMISSED (CHECK REASON): ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ ACTION STRICKEN (CHECK REASON): ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ STAYED DUE TO BANKRUPTCY
- ☐ DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

This matter is before the Court on Plaintiff's Motion to Amend or Alter or Reconsider An Order of the Court and Issue Preservation filed on July 25, 2022 and Plaintiff's Motion to Alter or Amend Order Granting Defendant Robert Henry Purkerson Summary Judgment filed on August 29, 2022. Having thoroughly reviewed the file, all prior and current submissions of the parties, and applicable case law, the motions are DENIED.

ORDER INFORMATION

This order ☒ ends ☐ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 09/08/2022 .

Michael Gene Putnam for Michael Gene Putnam
Michael Gene Putnam for Michael Gene Putnam

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCF.

ELECTRONICALLY FILED - 2022 Oct 11 2:23 PM - GREENVILLE - COMMON PLEAS - CASE#2020CP2301450
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Greenville Common Pleas

Case Caption: Michael Gene Putnam vs. Wake Christian Academy , defendant, et al
Case Number: 2020CP2301450
Type: Order/Electronic Form 4

So Ordered

G.D. Morgan Jr.

Electronically signed on 2022-09-08 16:09:08 page 3 of 3

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF GREENVILLE	)	C.A. No.: 2020-CP-23-01450
	)	
Michael Gene Putnam,	)	
	)	
	)	
	)	
	)	
Plaintiff	)	
vs.	)	ORDER GRANTING DEFENDANT
	)	ROBERT HENRY PURKERSON'S
Robert Henry Purkerson,	)	RENEWED MOTION FOR SUMMARY
	)	JUDGMENT
	)	
Defendant	)	
	)	
	)	

This matter came before this Court on June 21, 2022, pursuant to Defendant Robert Henry Purkerson's (hereinafter Defendant or Purkerson) Renewed Motion for Summary Judgment. Defendant was represented by Wesley J. Shull and Plaintiff presented *pro se*.

During the Hearing, this Court considered the evidence presented by the parties. After weighing all presented evidence, including motions, memorandums of law (with accompanying exhibits), and oral arguments given by counsel for Defendant and by Plaintiff, the Court grants Defendant's Renewed Motion for Summary Judgment. The ruling is supported by all the evidence on the record and the filings contained herein.

PROCEDURAL HISTORY

Plaintiff's ex-wife, Lyn Maples, is currently married to Robin Maples, a former co-defendant of Purkerson's in this lawsuit. There was one child born of Plaintiff and ex-wife's marriage ("Child"). This Child is still a minor. Until recently, Maples, his wife, and Child lived in North Carolina. While living in North Carolina, Child attended Wake Christian Academy ("Wake Christian") who was formerly a defendant in this case, but was dismissed. (Am. Compl. ¶ 11)

Other former defendants included employees of Wake Christian, Dana Lynn Cordell, Kellie O'Neal Auerweck ("School Defendants"), as well as attorney Vanessa Kormylo. All defendants, other than Robert Henry Purkerson, have also been dismissed from this case. Defendant Robert Henry Purkerson is Lyn Maples' father and is, therefore, the father-in-law of Defendant Robin Maples and the maternal grandfather of Child. (Am. Compl. ¶ 51)

Plaintiff initially began this civil action against Robin Maples and School Defendants when he filed a complaint in Greenville County Court of Common Pleas on June 21, 2019, Case No. 2019-CP-23-03584 ("2019 Complaint"), asserting causes of action of libel *per se* and conspiracy to defame against Maples. Plaintiff also asserted libel *per se* and conspiracy to defame causes of action against the School Defendants.

The School Defendants removed the case to federal court based on diversity, Case No. 6:19-cv-2136-TMC. Maples consented and joined in their removal. Plaintiff filed an amended complaint ("2019 Amended Complaint") asserting claims of libel *per se* and conspiracy to defame against Purkerson in an attempt to defeat diversity. (Am. Compl., August 26, 2019, attached as Ex. A)

The federal magistrate filed his report ("Report") on November 25, 2019. (Report of Magistrate Judge, p. 6, November 25, 2019, Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. B) The Report was adopted and incorporated in the Hon. Timothy M. Cain's Order of February 6, 2020, holding that Purkerson was fraudulently added to defeat diversity and denying Plaintiff's request to amend a second time. (Order, February 6, 2020, Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. C)

After Plaintiff's time for appeal of the federal court's order expired, Plaintiff re-filed his claims in the present action in state court via a March 6, 2020, Complaint. ("2020 Complaint") and

also filed an April 6, 2020, Amended Complaint ("Amended Complaint"). A Motion to Dismiss was filed by Defendant Purkerson and this issue was heard by the Hon. Edward W. Miller on June 25, 2020. Judge Miller issued an Order on June 25, 2020, stating, "After liberally construing the pleadings due to the Plaintiff's position as a pro se litigant, the Court respectfully denies both Defendant's Motions to Dismiss, at this time." (June 25, 2020, Order, Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. D)

Defendant Purkerson filed a Motion for Summary Judgment on April 13, 2021. Oral argument was held before Judge Letitia Verdin on April 21, 2021. In an April 27, 2021, Form 4 Order, Judge Verdin ruled, "After careful review of the pleadings and other filings in this case, this Court denies Defendant Puerkson's Motion for Summary Judgment at this time. However, Plaintiff is ordered to provide with specificity the names of 'mutual friends or acquaintances in Greenville, SC' referred to in Paragraph 57 of Plaintiff's First Amended Complaint. Plaintiff shall provide this information to all Defendants within 14 days of the date of this Order. Failure to provide this information to Defendants will result in this Court granting Defendant Purkerson's Motion for Summary Judgment."

On May 7, 2021, Plaintiff sent defense counsel a letter with an attachment listing 14 potential witnesses, including Gail Purkerson (Defendant Purkerson's wife), Tony Traynham, Jeff Fleming, Nikkee Fleming, and Zoie Fleming (Defendant Purkerson's granddaughter). (May 7, 2021, letter, Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. G)

On December 22, 2021, Defendant Purkerson filed a Motion to Compel Discovery responses, resulting in a February 1, 2022, Order of Judge Cordell Maddox compelling Plaintiff to provide additional discovery. Specifically, this Order compelled Plaintiff to provide complete answers to Purkerson's Interrogatories Numbers 5 and 6. In response to this, Plaintiff provided a

February 21, 2022, letter with 5 Exhibits attached. (Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. I, with only attachments Ex. 2 and Ex. 3 from Plaintiff's responses) Also, in response to an email exchange between defense counsel and Plaintiff (Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. J), Plaintiff sent a February 22, 2022, letter explaining his discovery responses. (Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. K)

On January 11, 2022, Defendant Purkerson filed a Motion to Compel Plaintiff's Deposition, resulting in a March 24, 2022, Form 4 Order from Hon. Edward W. Miller that ordered Plaintiff to appear at defense counsel's office on April 12, 2022, at 10:00 AM. The deposition took place on April 12, 2022. (Partial Transcript of Plaintiff's Depo. at Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. H)

FACTS

Plaintiff's claims against Defendant Robert Henry Purkerson allege defamation *per se* and conspiracy to defame. The parties have conducted discovery in this matter. Specifically, the parties have exchanged written discovery and Plaintiff's deposition was taken by Purkerson's attorney on April 12, 2022. (Defendant's Memo. in Support of Summary Judgment Ex. H, I, J and K). In addition, defense counsel has procured affidavits from Defendant Robert Purkerson, Dr. Ryland Tyrone Traynham, Sergeant Robert Perry, Jeffrey Fleming, and Nicole Fleming. (*Id.* at Ex. E, F, L and M). Lyn Maples was also previously married to Jeff Fleming, with whom she had one child, Zoie Fleming. Jeff Fleming is currently married to Nikkee Fleming.

During the Summer of 2016, an investigation was conducted by law enforcement and the local authorities in Greenville, South Carolina into alleged criminal conduct by Plaintiff based on

information that Child conveyed to her teacher and counselor at Wake Christian. (Am. Compl. ¶¶ 9-11 & Ex. #1-3 to Am. Compl.) This investigation is the basis for this lawsuit.

In his Amended Complaint, Plaintiff alleges that Purkerson has “engaged in constant and willful action aimed at parental alienation directly and by aiding and abetting MAPLES in his pursuit of parental substitution by making false and defamatory statement about Plaintiff in the presence of CHILD.” (Am. Compl. ¶ 52) Plaintiff further alleged that Purkerson “made false allegations and has encouraged CHILD to either exaggerate or make up stories defamatory of the PLAINTIFF, and to pass such on to other adults in an attempt to denigrate PLAINTIFF’S reputation and standing as a person of good character in an attempt at parental substitution.” (*Id.*, ¶ 53)

Plaintiff further alleged that Purkerson encouraged CHILD to lie to the North Carolina DSS and the Greenville County Sherriff’s Office and that “PURKERSON in fact called a Sargent Robert Perry with the Greenville County Sherriff’s Office trying to have him re-open the ‘Investigation’ and making defamatory statements in an effort to further denigrate the reputation of PLAINTIFF.” (*Id.*, ¶ 54)

Plaintiff further alleges that Purkerson, “... disclosed the information of a sex crime investigation and made other derogatory comments to Dr. Ryland T. (Tony) Traynham who is an oral surgeon here in Greenville ...” (*Id.*, ¶ 55)

On October 21, 2020, Dr. Ryland Tyrone Traynham executed an affidavit (“Affidavit of Traynham”) in which he testified, among other things, “I have never heard [Purkerson] say anything negative about Mr. Putnum.” (Aff. of Traynham, Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. E)

On November 9, 2020, Sergeant Robert Perry, of the Greenville County Sheriff's office, executed an affidavit ("Affidavit of Perry"). In said affidavit, Sergeant Perry testified, among other things, "My interaction with Robert Purkerson was limited to one phone call. During the call, I explained to Mr. Purkerson the reason that the Greenville County's Sheriff's Office was not moving forward with the criminal charges against Michael Putnam." (Aff. of Perry, Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. F). Sergeant Perry further testified in his affidavit, "During the call with Mr. Purkerson, he never asked that the investigation into Mr. Putnam be re-opened. He did not make any allegations or claims about Mr. Putnam during our call." (*Id.*)

Plaintiff's February 21, 2022, letter was, per Judge Maddox's Order, supposed to answer, completely, Defendant Purkerson's Interrogatories #5 and #6, which said:

5. Set forth the specific contents of any and all Statements you allege Purkerson made concerning you. For each Statement, identify the date of the Statement, the person(s) to whom the Statement was made and any other person(s) present when the Statement was made if the Statement was a verbal communication, of if the Statement was a written communication, identify the recipient of the Statement and all persons to whom Purkerson provided a copy of the Statement.
6. State with specificity what Purkerson encouraged the Child to exaggerate and/or the false statements Purkerson encouraged the Child to make. State what aspect of the Child's statements were exaggerated or false and the manner in which the statements were exaggerated or false.

Plaintiff's response to Interrogatory #5 was attached to a February 21, 2022, letter to defense counsel. (Def. Memorandum in Support of Motion for Renewed Summary Judgment Ex. I). In his response, Plaintiff referred to: (1) 36 pages of copies of text message exchanges between himself and Nikkee Fleming "all involving your client;" (2) an undated copy of an email from Defendant to Jeffrey C. Fleming in which Defendant referred to Plaintiff as a "sick desperate man," and stated that Plaintiff was manipulating Mr. Fleming "big time;" (3) an August 21, 2015, email

from Defendant to Plaintiff, copying Maggie Nowell and Lyn Purkerson, in which Defendant told Plaintiff that "All communications with [Defendant's wife] and [Purkerson] must come to me at my e-mail address or home phone. Do not continue texting and calling Gail. I am your only contact starting now;" and, (4) a copy of an undated email from Defendant to Plaintiff in which he stated, "I understand that you have lawyered up and we will get lawyered up. The lawyers will try to assassinate the character of each person and everybody will loose [sic] and a judge will make a decision and probably get DSS involved. What will happen to [Child] and where does this end and when will you get out of our lives?" (*Id.*) Copies of these communications were attached to Plaintiff's amended responses and to his supplemented responses to Defendant's Requests to Produce.

The text message exchanges submitted by Plaintiff in his supplemental discovery were texts between Plaintiff and Nikkee Fleming. Nikkee Fleming is the current wife of Jeff Fleming, who was previously married to Purkerson's daughter, Lyn Maples. Also included in Plaintiff's responses was a transcript from a telephone conversation between Plaintiff and Purkerson in which Purkerson allegedly told Plaintiff, "You're going to get yours; cause I'm going to give it to you bigtime!" The audio recording of this exchange was played for the Court at the June 21, 2022, hearing by Plaintiff on his mobile phone. Plaintiff's discovery response also included an email with a redacted date from Bob Purkerson to Jeff Fleming in which Purkerson stated, "Michael is a sick and desperate man and is manipulating you big time. What Michael is doing and saying is not true. We are so thankful Zoie is safe and happy with you and is getting the help that she needs. You are doing a fine job with her and we thank you for it. We wish we could help."

Plaintiff also emailed defense counsel audio recordings, none of which contain a recording of Purkerson defaming Plaintiff to any third-party.

In Plaintiff's supplemental response to Interrogatory #6, he discussed the evidence that he had that showed that Defendant encouraged his child to exaggerate and/or make false statements about him. (Defendant's Memo. Exhibit D) In his response, Plaintiff stated:

Wes, since I was not present when much of this occurred, I will be relying on testimony from other individuals. Some of the same ones mentioned above. Ms. Hinkle in Mt. Pleasant will be able to testify that my daughter eaves drops on family meetings where Purkerson and Lyn and Rob are behind closed doors, and [daughter's name] puts her ear up against the wall. My daughter has called me from inside cars while parked in the driveway and asked me why "bad" things are said. I am trying to find the phone recordings of those, which I believe is in my storage facility. Sometimes if a child hears the same thing over and over, they will begin to believe it.

Also, I have been desperately trying to get emails, which I believe will unlock a vault of gold in my opinion. I hope to have the audios cleared up by the end of next week. They are highly time consuming to work with.

An audio recording of a voicemail that was purportedly left on Plaintiff's' voicemail by Defendant was played in Court by Plaintiff, and transcripts of two audio recording that purportedly contained recorded conversations between Plaintiff and Defendant were submitted as an exhibit to Plaintiff's Motion in Opposition to Summary Judgment by Purkerson. This submitted transcript reads as follows:

MR. PURKERSON:

Okay. I can't wait to get my hands on you, buddy.

MR. PUTNAM:

Well, still got a ways to go, don't we?

MR. PURKERSON:

Yeah, we do. You're gonna get yours, 'cause I'm gonna give it to you big time."

Also submitted as an exhibit to Plaintiff's Memorandum was a transcript of the same audio recording that Plaintiff played in Court during arguments. The transcript stated:

MALE VOICE:

(Inaudible) all over the damn parking lot. You have disgraced my family. You have – you’ve dishonored my wife. You’ve dishonored all of us. And you is just – you is just trash is what you are. You’re just lou – lousy trash.

FEMALE VOICE:

This is why we brought the cops. We thought he was coming anyway.

MALE VOICE:

Why you bring policemen to my house when you’re supposed to pick her up today anyway? We knew that. All you had to do was to come by and all you had to do was make your own schedule. Instead you arrive at my house with two damn policemen. You are a lowlife coward, that’s what you are. And if you want to defend those words, I’ll meet you anywhere anytime. And I can’t wait to get my hands on you. Goodbye.

Also submitted as evidence by Plaintiff as another attachment to his Motion in Opposition to Summary Judgment by Purkerson was a copy of a June 5, 2020, email from Nikkee Fleming to Plaintiff, in which Nikkee Fleming supposedly stated:

FYI Lyn went ballistic on Zoie this past week stating she has been talking to you. Zoie told her she hasn’t and she wouldn’t believe her. Lyn told Zoie that you had told her that you are communicating with her. Zoie told her she hasn’t but Lyn didn’t believe her. Then Bob and Gail sat Zoie down and to tell her how awful you are and Zoie just cut them off and asked not to be drug into the drama between Lyn and Ella’s father. They shouldn’t be discussing anything with Zoie. My assumption is they don’t want you to know they are moving here. The photos from their listing have not furniture because it’s all down here in Mt pleasant. [sic] She just needs to tell the truth. It’s really unfair for you to have no clue what she’s doing with your daughter.

Plaintiff’s deposition revealed the following pertinent information:

- When asked when he first found out about Purkerson’s allegedly defamatory statements, Plaintiff answered that he found out about them in 2018; (Tr. pg. 50, ll. 9-15)

- Plaintiff admitted that he had given to defense counsel all of the text messages and phone call recordings that he had in his possession; (Tr. pg. 51, ll. 16-25)
- When asked if there was anything in the information provided through discovery that would help Plaintiff recall when he first found out about Purkerson's alleged defamation, Plaintiff admitted that this information contained nothing that would help him answer this question precisely; (Tr. pg. 51, ll. 1-9)
- Plaintiff admitted that he could not state when Purkerson first made a defamatory statement about Plaintiff; (Tr. pg. 53-54, ll. 22-24)
- Plaintiff admitted that he could not recall when he first learned of Purkerson's defamatory statements, but testified that he was first told about them by his daughter, Jeff Fleming and Nikkee Fleming; (Tr. pg. 56, ll. 16-24)
- Plaintiff could not recall when he was first told about Defendant's alleged defamatory statements or who it was who told him about these alleged statements; (Tr. pg. 57, ll. 20-25)
- When asked who he could name that had told him of Purkerson's alleged defamatory statements, Plaintiff listed his daughter, Larry Hoxie, Nikkee Fleming, Jeff Fleming, Zoie Fleming, Tony Traynham, Dana Cordell and Kellie Auerweck; (Tr. pg. 59, ll. 16-21; pg. 60, ll. 7-10; pg. 61, ll. 8-25; pg. 62, ll. 1-13)
- Plaintiff later admitted that he could not recall Larry Hoxie telling Plaintiff about any statements made by Purkerson to Mr. Hoxie about Plaintiff; (Tr. pg. 65, ll. 24-25; pg. 65, ll. 24-25; pg. 66, l. 1)

- Plaintiff was read his response to Purkerson's Interrogatory #5, and admitted that, other than maybe some emails that he had been attempting to obtain, he had nothing to add to his response; (Tr. pgs. 78, ll. 19-25; pg. 79, ll. 1-25; pg. 80, ll. 1-25)
- Plaintiff was asked during his deposition to show defense counsel where in the text messages he had provided between himself and Nikkee Fleming there was evidence of any defamatory statements made by Purkerson, but could only refer to some audio recordings from another supposed witness, Kearson, that have not been produced; (Tr. pg. 82, ll. 11-25)
- Plaintiff admitted that his other witnesses he listed in either his May 7, 2021, letter, or in his discovery responses, namely Gail Purkerson, Amy Creamer, Barbara Hawkins, Diane Jeter, Carol Morgan, Taylor Wilson Tucker, Robbie Purkerson and Gloria Walker never directly told Plaintiff about any alleged defamatory statements made by Purkerson about Plaintiff; (Tr. pg. 88, ll. 15-25; pg. 89, ll. 1-25; pg. 90, ll. 1-24)
- Plaintiff admitted that he could not recall if Chyna Nunez, Ginger Pop, listed in Plaintiff's first Set of Interrogatory Responses, had ever told him about any defamatory statements made about him by Purkerson; (Tr. pgs. 94, ll. 15-25; pg. 95, ll. 1-25; pg. 96, ll. 1-25)
- Plaintiff testified that the Guardian ad Litem appointed to the family court case, Elizabeth Martin-Young, discussed with him that Purkerson had defamed Plaintiff, but could not recall the specifics of what she told him, other than to state that "... a lot of rap has gone under the river bridge, and for me to sort that out in my mind right now, I couldn't do that;" (Tr. pg. 97, ll. 1-25; pg. 98, ll. 1-6)

- Plaintiff admitted that he cannot prove any financial damages due to Purkerson's alleged defamation; (Tr. pgs. 98, ll. 23-25; pg. 99, ll. 1-25; pg. 100, ll. 1-24)
- Plaintiff admitted that the transcribed recording of an alleged audio recording of Purkerson that he had submitted in his discovery responses did not contain any defamatory statements; (Tr. pg. 108, ll. 1-9; Ex. to Defendant's Memorandum Ex. I)
- When asked why he had not obtained affidavits of any witnesses regarding defamatory statements made by Purkerson, Plaintiff admitted that he had not asked any witnesses for affidavits, rather stating that he was "fine with just turning them loose, which is why I decided not to depose them. That's just not necessary." (Tr. pgs. 115, ll. 1-25; pg. 116, ll. 1-25; pg. 117, ll. 1-11)

On June 13, 2022, both Nicole Fleming and Jeff Fleming executed affidavits stating that Purkerson never discussed any investigation by legal authorities into Plaintiff, never "made any negative factual statements" about Plaintiff to either of them, and stated that they have no personal knowledge of any defamatory statements made by Purkerson about Plaintiff. (Ex. L and M)

On April 18, 2022, Robert Purkerson executed an affidavit denying that he ever encouraged his granddaughter to exaggerate or make up stories defamatory to Plaintiff and also denied that he ever made a false statement about Plaintiff concerning any sex crime investigation to anyone, including counselors in Greenville, Jeff Fleming, Nikkee Fleming, Zoie Fleming, Larry Hoxie, Dana Cordell, Kellie Auerweck, or Elizabeth Martin-Young. This affidavit was attached to Purkerson's Renewed Motion for Summary Judgment.

STANDARD OF REVIEW

Under Rule 56 of the South Carolina Rules of Civil Procedure, “[s]ummary judgment is appropriate when the pleadings, depositions, answers to interrogatories, and admissions on file, together with affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.” Nelson v. Piggly Wiggly Cent., Inc., 390 S.C. 382, 388, 701 S.E.2d 776, 779 (Ct. App. 2010). “In determining whether any triable issues of fact exist, the evidence and all reasonable inferences therefrom must be viewed in the light most favorable to the non-moving party.” Id.

“The purpose of summary judgment is to expedite the disposition of cases which do not require the services of a fact finder.” Englert, Inc. v. LeafGuard USA, Inc., 377 S.C. 129, 134, 659 S.E.2d 496, 498 (2008). “A conclusory statement as to the ultimate issue in a case is not sufficient to create a genuine issue of fact for purposes of resisting summary judgment.” Shupe v. Settle, 315 S.C. 510, 516-17, 445 S.E.2d 651, 655 (Ct. App. 1994). “As Rule 56(e), SCRPC, states, a party may not rest upon the mere allegations or denials of his pleading[s].” Nelson, 390 S.C. at 389.

Per S.C.R.C.P. 56(e), “Supporting and opposing affidavits shall be made on personal knowledge, shall set forth such facts as would be admissible in evidence, and shall show affirmatively that the affiant is competent to testify to the matters stated therein. Sworn or certified copies of all papers or parts thereof referred to in an affidavit shall be attached thereto or served therewith. The court may permit affidavits to be supplemented or opposed by depositions, answers to interrogatories, or further affidavits. When a motion for summary judgment is made and supported as provided in this rule, an adverse party may not rest upon the mere allegations or denials of his pleading, but his response, by affidavits or as otherwise provided in this rule, must set forth specific facts showing that there is a genuine issue for trial. If he does not so respond,

summary judgment, if appropriate, shall be entered against him.” S.C.R.C.P. 56(c) states that “The motion shall be served at least 10 days before the time fixed for the hearing. The adverse party may serve opposing affidavits not later than two days before the hearing.”

ANALYSIS

The Court finds there are no genuine issues of material fact that must be submitted to a fact finder as to Defendant Robert Henry Purkerson; therefore, Defendant Purkerson is entitled to summary judgement as a matter of law.

A person makes a defamatory statement if the statement "tends to harm the reputation of another as to lower him in the estimation of the community or deter third persons from associating or dealing with him." Fleming v. Rose, 350 S.C. at 494, 567 S.E.2d at 860 (2002).

Under South Carolina law, to state a cause of action for defamation, [a plaintiff] must allege the existence of some message that (1) is defamatory, (2) is published with actual or implied malice, (3) is false, (4) is published by the defendant, (5) concerned the plaintiff, and (6) resulted in legally presumed or in special damages. Richardson v. State-Record Co., 330 S.C. 562, 565, 499 S.E.2d 822, 824 (Ct. App. 1998).

In cases in which the non-moving party bears the burden of proof at trial, a movant properly makes and supports a motion for summary judgement by pointing out to the court the absence of proof for one or more elements of the non-moving party's claim. See Lanham v. Blue Cross Blue Shield of S.C. Inc., 349 S.C. 356, 361, 563 S.E.2d 331, 333 (2002) (citation omitted). When such a motion is made, the non-moving party cannot rest on allegations alone, but “by affidavits or as otherwise provided in this rule, must set forth specific facts showing that there is a genuine issue for trial.” SCRC.P. 56(d).

To be libelous, the words on their face or by reason of extrinsic facts, must tend to impeach the reputation of the plaintiff, or, as often stated, they must tend to injure reputation. McGregor v. State Co., 114 S.C. 48, 103 S.E.2d 84 (1920); See Prosser, Law of Torts, p. 739 (4th E. 1971); Restatement (Second) of Torts § 559 (1977). To be actionable, the libel, as a result of its tendency to impeach or injure the plaintiff's reputation, must thereby injury him. Id. The injury, if any, which results from the libel is in the form of 'general damages' or 'special damage.' 'General damages' are those damages which the law presumes, without proof, to have resulted from the publication of the libel. 'Special damage' is actual damage and must be pled and proved. Damages in at least one of these forms must be present to render a libel actionable. If the libelous publication is actionable without the pleading and proof of special damage, it is said to be 'actionable per se.' If special damage must be pled to maintain an action, the defamation is 'actionable per quod.'" Capps v. Watts, 271 S.C. 276, 246 S.E.2d 606 (1978) (citing Restat. 2d. of Torts, § 559). The Restatement states:

A communication to be defamatory need not tend to prejudice the other in the eyes of everyone in the community or of all of his associates, nor even in the eyes of a majority of them. It is enough that the communication would tend to prejudice him in the eyes of a substantial and respectable minority of them, and that it is made to one or more of them or in a manner that makes it proper to assume that it will reach them. On the other hand, it is enough that the communication would be derogatory in the view of a single individual or a very small group of persons, if the group is not large enough to constitute a substantial minority. If the communication is defamatory only the eyes of a minority group, it must be shown that it has reached one or more persons of that group, although if it is published in a newspaper it will be presumed, unless the contrary is shown, that it was reads by them. Although defamation is not a question of majority opinion, neither is it a question of the existence of some individual or individuals with views sufficiently peculiar to regard as derogatory what the vast majority of persons regard as innocent. The fact that a communication tends to prejudice another in the eyes of even a substantial group is not enough if the group is one whose standards are so anti-social that it is not proper for the courts to recognize them. If the communication is obviously defamatory in

the eyes of the community generally, the fact that the particular recipient does not regard it as discreditable is not controlling.

In the present case, Plaintiff has presented one voice message that Purkerson allegedly left on Plaintiff's mobile device, one voice recording of an in-person encounter between Purkerson and Plaintiff, and three emails to support his case. Out of these 3 emails, 2 of them were from Purkerson directly to Plaintiff. One of these 2 emails was between Defendant and Plaintiff solely, with another being the same, save for third-parties, Maggie Nowell and Lyn Purkerson, who were copied on the email chain. This email simply states, "All communication with Gail and me must come to me at my e-mail address or home phone. Do not continue texting and calling Gail. I am your only contact starting now." The one email that Defendant allegedly sent to a third-party, the undated email sent to Jeff Fleming, a member of the extended family, does not contain any false factual assertions regarding Plaintiff and only states Defendant's opinions that Plaintiff was a "sick desperate man" and stated Defendant's opinion that Plaintiff was attempting to manipulate Jeff Fleming. Clearly, Jeff Fleming did not understand any possible defamatory meaning from this email, if any existed, as evidenced by Fleming's June 13, 2022, affidavit in which he denied knowing of any defamatory statements made by Defendant about Plaintiff.

Per Richardson and Rose, publication to a third party is a necessary element to this cause of action. Per Capps and the Restatement (Second) of Torts, this publication must be derogatory to more than a single individual or a very small group of persons, such as family members. The email sent from Defendant to Jeff Fleming clearly does not meet these requirements. All of the communications made directly to Plaintiff by Defendant, including voicemail messages, emails, and in-person communications do not meet this publication requirement, as they were all communicated directly to Plaintiff or were directed to a family member.

Support of Renewed Motion for Summary Judgment, and the excerpts of Plaintiff's deposition transcript also submitted as an attachment to Defendant's Memorandum. Specifically, Robert Purkerson, Nikkee Fleming, Jeff Fleming, Dr. Traynham, and Sergeant Perry have all executed affidavits denying any knowledge of any alleged defamatory statements. Plaintiff is required, per Rule 56, to rebut this testimony.

Plaintiff has not made any admissible factual showing in opposition to Defendant's properly supported Renewed Motion for Summary Judgment as required by the Rules, and the Renewed Motion for Summary Judgment should be granted. See Dawkins v. Fields, 354 S.C. 58, 70, 580 S.E.2d 433, 439 (2003) ("[w]here a plaintiff relies solely upon the pleadings, files no counter-affidavits, and makes no factual showing in opposition to a motion for summary judgment, the lower court is required under Rule 56, to grant summary judgment if, under the facts presented by the defendant, he was entitled to judgment as a matter of law.") (quoting Humana-Hosp.-Bayside v. Lightle, 305 S.C. 214, 216, 407 S.E.2d 637, 638 (1991)).

CONCLUSION

The Court finds there are no genuine issues of material fact that must be submitted to a fact finder. Plaintiff has failed to meet his burden of showing a factual issue.

IT IS HEREBY ORDERED that Defendant Purkerson's Renewed Motion for Summary Judgment is GRANTED.

IT IS SO ORDERED.

The Honorable G.D. Morgan, Jr.
Circuit Court Judge
Thirteenth Judicial Circuit

ELECTRONICALLY FILED - 2022 Oct 11 2:23 PM - GREENVILLE - COMMON PLEAS - CASE#2020CP2301450

ELECTRONICALLY FILED - 2022 Aug 17 9:06 AM - GREENVILLE - COMMON PLEAS - CASE#2020CP2301450

Entered this _____ day of _____, 2022
Greenville, South Carolina



Greenville Common Pleas

Case Caption: Michael Gene Putnam vs. Wake Christian Academy , defendant, et al
Case Number: 2020CP2301450
Type: Order/Summary Judgment

So Ordered

G.D. Morgan Jr.

Electronically signed on 2022-08-16 17:20:59 page 20 of 20

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

G.D. Morgan, Jr., Circuit Court Judge

Case No. 2020-CP-23-01450

Michael Gene Putnam.....Appellant,

v.

Robert Henry Purkerson.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the Notice of Appeal on Wesley J. Shull, Esquire, counsel for Respondent at the address below by depositing a copy of same in the United States Mail, postage prepaid, on October 10, 2022.

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Columbia, South Carolina
October 10, 2022

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

MICHAEL GENE PUTNAM,)
)
 PLAINTIFF,)
)
 -VS-)
)
 ROBIN CARY MAPLES, ET AL.,)
)
 DEFENDANTS.)
 _____)

2020-CP-23-01450

TRANSCRIPT OF RECORD

MAY 12, 2021
GREENVILLE, SOUTH CAROLINA
VIA WEBEX

BEFORE:

THE HONORABLE PERRY H. GRAVELY

APPEARANCES:

ATTORNEY FOR PLAINTIFF:

MICHAEL PUTNAM (PRO SE)

ATTORNEY FOR DEFENDANTS:

ROBIN MAPLES (PRO SE)
WESLEY J. SHULL, ESQ.

SUSAN W. HUDGINS
CIRCUIT COURT REPORTER

INDEXWITNESSPAGE NO.

CERTIFICATE OF REPORTER

23

EXHIBITSNODESCRIPTIONIDEVIDENCE

(No Exhibits Were Presented During This Hearing)

1 **THE COURT:** All right. Just to let you know everybody
2 that's on. You've probably already saw them. We have a court
3 reporter, who is Susan Hudgins. We have Wesley Shull, who is
4 observing. And then we have, of course, Mr. Maples and
5 yourself.

6 So these are two motions, which have been filed by Mr.
7 Maples, a motion for summary judgment, a motion for sanctions.
8 Mr. Maples, I'll be glad to hear from you. This is -- just
9 for the record, it's 2020-CP-23-1450.

10 **MR. MAPLES:** Yes, sir. So, as you know, I'm not an
11 attorney. I've got an appreciation for those that understand
12 all this stuff, so you'll have to bear with me.

13 **THE COURT:** All right.

14 **MR. MAPLES:** I'd have a long way to go if I chose that
15 path.

16 I do have two affidavits, Your Honor. And they've been
17 properly certified before the courts. And they've been
18 emailed, and mailed and served. The first affidavit, it's
19 titled affidavit of Robin Maples.

20 To give you some of the history with this case, I'll be
21 as efficient as I can. It was opened by Mr. Putnam in 2019,
22 June of 2019, so we're approaching the two year point. I am
23 the step-father to Eve, which is a minor child of Mr. Putnam
24 and my current wife, Lynn Maples.

25 The primary reason for my motion for summary judgment, I

1 was just following the court order. We won a motion to
2 compel. My former lawyer, Chase Campbell, in Greenville filed
3 my motion to compel.

4 And the Honorable Judge Sprouse awarded that on February
5 22nd of this year. And this is in the affidavit. And to
6 quote the deliverable from Mr. Putnam in bold in the
7 affidavit, all answers to disputed interrogatories providing
8 his alleged defamatory statements made by myself, defendant
9 Robin Cary Maples. The responses were due, Your Honor, within
10 30 days or March 24th. However, Mr. Putnam neither replied
11 with any responses to the interrogatories as I provided by
12 Chase Campbell Law, nor did he ask the court to reconsider the
13 entire order.

14 As such, to be very concise, the other -- the supplement
15 affidavit number two really has four points succinct to this
16 point and the motion for sanctions. Point one is -- and I've
17 attached this for the Court. The Form 4 is the court order
18 that Honorable Judge Sprouse required Mr. Putnam to -- if he
19 had evidence that -- this has been going on for two years.
20 Mr. Putnam's filed about 70 motions in family court, civil
21 court. I'm here today because I can't afford lawyers anymore.
22 So I'm in this situation.

23 But exhibit A is the court order where Honorable Judge
24 Sprouse had ordered plaintiff Michael Putnam provide these
25 details if there was defamation. And that doesn't mean email

1 as you well know back and forth that's provoked by him, that
2 means a third party.

3 By being -- number two -- excuse me. Exhibit B is what I
4 referred to a moment ago what my counsel at the time, Chase
5 Campbell, said. This is what we need clarified by way of more
6 clarity on the interrogatories.

7 Number three, ---

8 **THE COURT:** Let me stop you there -- let me stop you, Mr.
9 Maples. I have reviewed that. Have you received a response
10 since that time?

11 **MR. MAPLES:** I have received only -- and Mr. Putnam will
12 tell you differently. I have received via FedEx at my home
13 three binders that are printouts of FamilyWizard that's
14 pertinent to family court, about 1,000 pages. I've received
15 about -- approximately a dozen email printouts from some of
16 the people that he's alleged, but there's nothing defamatory
17 in there. And it's really emails to -- from himself, nothing
18 from me. And that's it. There was no interrogatories.

19 Now one point, Your Honor, I want to make respectably.
20 Honorable Judge Alex Kinlaw ordered me to provide the same in
21 just a recent order. I'd be remiss not to tell you I have
22 done that. I have filed that. I have filed that to the Court
23 and certified it.

24 So I have -- anything in my interrogatories that was
25 objected to by Chase Campbell, I gave a proper answer. I

1 can't admit something if I didn't do it. And so I have done
2 that, Your Honor.

3 The third point and the reason I'm here today, Your
4 Honor, is the court order says -- I'm going to quote, if I
5 can, in bold, if the plaintiff does not strictly comply with
6 this order, defense counsel -- I, of course, don't have
7 counsel anymore, may request a hearing to determine
8 appropriate attorney's fees, costs, sanctions.

9 The final point, and I won't repeat this unless you ask
10 me to in these supplemental affidavits is -- and, again, I am
11 not an attorney. I can read. And Rule 37(b) says just that,
12 that if one is ordered to provide discovery evidence and they
13 do not do it -- do that, sanctions are in order.

14 The other document I have forwarded to the Court, I've
15 spent eighteen thousand, three hundred and sixty-six dollars
16 and eighteen cents (\$18,366.18). And I still have an
17 outstanding balance of eighteen thousand, nine sixty-seven
18 (18,967) to Chase Law. My total expenses for this frivolous
19 suit has been thirty-seven, three thirty-three, thirty-nine
20 (37,333.39).

21 That really is it, Your Honor. Again, I'm not an
22 attorney, but the motion that I did file, and I've got the
23 certification, is a motion supporting sanctions against the
24 plaintiff for this frivolous lawsuit.

25 You know, in closing I will say I'm seeking the

1 attorney's fees. You know, this case has gone on two years,
2 Your Honor. It initially had litigants in North Carolina. We
3 were from Raleigh, North Carolina and moved one year ago to
4 Mount Pleasant.

5 And all the other litigants, Wake Christian Academy
6 teachers, my step-child, Mr. Putnam's daughter, her school,
7 they've all been exonerated. The only ones remaining in this
8 case is my father-in-law, Mr. Putnam's ex-father-in-law. He's
9 82 years of age.

10 And, you know, I just -- this has gone on a long time.
11 The court ordered that if there was evidence, Mr. Putnam
12 provide that evidence. And he's totally avoided any
13 responsibility with the court. And that's really it.

14 I mean, I would like, you know, to not have further
15 sanctions against -- or restraints from these type motions.
16 And this one being a summary judgment just says that a
17 decision is made today based on lack of following a court
18 order by the Honorable Judge Sprouse.

19 **THE COURT:** Well, let me ask you this. Now the
20 interrogatories that we are talking about here, are these the
21 defendant Robin Cary Maples' first set of interrogatories to
22 plaintiff, which were subject to the motion to compel filed
23 back in January of this year?

24 **MR. MAPLES:** The -- those might be mine.

25 **THE COURT:** Aren't those the ones that you sent to Mr.

1 Putnam?

2 MR. MAPLES: Yes, Your Honor.

3 THE COURT: Motion to compel on January the 20th. And
4 then -- I'm just trying to reconstruct here.

5 MR. PUTNAM: Your Honor?

6 THE COURT: Yes.

7 MR. PUTNAM: Mr. Maples filed his motion to compel on
8 January 20th.

9 THE COURT: Right.

10 MR. PUTNAM: And I filed a motion to compel on January
11 22nd.

12 THE COURT: All right. Well, we're -- yeah. January the
13 20th -- what I'm looking at here was -- I'm just making sure.
14 Okay. All right. So I've got the motion to compel that's
15 subject to the order of Judge Sprouse. All right.

16 And, Mr. Maples, have you received -- you said -- have
17 you received answers to interrogatories ---

18 MR. MAPLES: No, Your Honor. No, Your Honor, I have not.

19 THE COURT: All right. And, Mr. Putnam, have you -- what
20 have you done in response to Judge Sprouse's order?

21 MR. PUTNAM: Well, first of all, the interrogatories that
22 were sent to me were sent to me by Mr. Campbell as previous
23 counsel. And they were responded to to Mr. Campbell. And
24 whether he shared that with Mr. Maples or not, I don't know.

25 But what happened is that ---

1 **THE COURT:** Well, let me ask you this. Do you have a
2 copy of what you sent to Mr. Campbell?

3 **MR. PUTNAM:** Well, there was a lot of -- a lot of letters
4 and emails between myself and Mr. Campbell trying to resolve
5 the, you know, the issues related to discovery.

6 **MR. MAPLES:** Nothing's been sent to ---

7 **THE COURT:** Hold on.

8 **MR. MAPLES:** --- Mr. Campbell.

9 **THE COURT:** Mr. Putnam, let me ask you a specific
10 question here. Let me kind of go through it here. It was a
11 motion, I believe it was actually filed on behalf of Mr.
12 Campbell. Let me just double check here to make sure. Mr.
13 Campbell -- let's see, was he -- okay. Mr. Campbell was still
14 Mr. Maples' attorney. And on January the 20th, 2021 he filed
15 a motion to compel.

16 Then on -- this was heard and an order issued on February
17 the 22nd, '21 ordering you to strictly comply with --
18 providing complete answers to the disputed interrogatories.
19 What have you served since January the 22nd, '21 either to Mr.
20 Campbell or to Mr. Maples?

21 **MR. PUTNAM:** Well, in terms of interrogatories and
22 production to documents, I've sent over 1200 pages of -- three
23 binders of information to him.

24 **THE COURT:** All right. How about interrogatories? What
25 answers to interrogatories have you provided?

1 **MR. PUTNAM:** If I could say -- if I could say one thing.
2 When Judge Sprouse issued his order on February the 22nd,
3 before I even saw the order, Mr. Campbell filed a motion to
4 reconsider. And the order referred to both things that were
5 -- as to me, the plaintiff, and also things as to the
6 defendant -- the defendants.

7 And in Mr. Campbell's filing -- and that was on February
8 23rd, one day after the order was issued, and he says in his
9 filing, he says the court's February 22nd, '21 order is
10 ambiguous as to whether it's granting plaintiff's motion to
11 compel and whether any decision applies to one or both
12 defendants. So I had discovery ready, but I had no idea, and
13 I don't think Mr. Campbell did either, what Judge Sprouse was
14 going to do with that order given that he had made a ruling as
15 to my motion, which was not docketed and scheduled to be heard
16 that day.

17 **MR. MAPLES:** Your Honor, ---

18 **MR. PUTNAM:** As soon as ---

19 **THE COURT:** Well, let him finish. I'll hear from you in
20 just a second. All right. Go ahead.

21 **MR. PUTNAM:** Okay. As soon as Judge Sprouse issued his
22 order granting the motion for reconsideration, I contacted Mr.
23 Campbell's office about bringing over all the discovery
24 because there was about 12 pounds of material. And I was told
25 by a paralegal named Hanna, Mr. Putnam, let me check on that.

1 And apparently the relationship between Mr. Maples and Mr.
2 Campbell was (technological interference) I guess at that
3 time.

4 Two days later I was called and asked if I could come by
5 and sign a consent letter. And I said, as to what? And she
6 told me it was to -- for relief of counsel as to the
7 relationship between Mr. Campbell and Mr. Maples was
8 irreparable.

9 I said, well, do you want me to give you the discovery
10 and then you pass it on to Mr. Maples? And they said, no, we
11 don't -- we don't want it. And at the same time they would
12 not give me Mr. Maples' contact information, although, I had
13 his address.

14 MR. MAPLES: He's had that information ---

15 THE COURT: All right. Well, have you responded -- have
16 you filed responses to -- answers to interrogatories at any
17 point since any order's been issued?

18 MR. PUTNAM: Absolutely. Absolutely.

19 THE COURT: No, I'm not talking about -- what have you --
20 what have you provided?

21 MR. PUTNAM: Well, there was a -- there was a letter that
22 Mr. Campbell sent me on December 22nd, which ---

23 THE COURT: No. Listen to me. February the 22nd of 2021
24 there was an order that said answer to interrogatories be
25 provided. What answers to interrogatories have you provided

1 since February the 22nd of this year?

2 MR. PUTNAM: Well, in April, again, I sent 1200 pages of
3 documents ---

4 THE COURT: Listen to my -- listen to my question very
5 carefully. I'm not asking about documents you've provided.
6 I'm asking about answers to interrogatories. Those are
7 separate -- answer questions. What answers to interrogatories
8 have you provided since February the 22nd, 2021?

9 MR. PUTNAM: Well, in a letter to -- since February?
10 Well, he filed his motion to compel before I supplied on
11 January the 22nd a substantial amount of information to Mr.
12 Campbell. But it was already scheduled for a hearing. And so
13 we had the hearing. But there's been -- I've got letters,
14 emails, et cetera.

15 And, of course, I ---

16 THE COURT: Okay. So regardless of you providing that
17 beforehand, you still have an order that says that you have to
18 provide complete answers to interrogatories by March 24th.
19 And my question to you, did you do that?

20 MR. PUTNAM: I supplemented my answers. But as to ---

21 THE COURT: Where did you send those?

22 MR. PUTNAM: Well, during the period of time that the
23 motion for reconsideration was under review, not knowing
24 whether Judge Sprouse was going to change requirements as to
25 me or requirements as to the defendants, I did not provide

1 that. Again, the order ---

2 THE COURT: Have you provided -- has there been a -- let
3 me ask you this. Has there been an order issued for the
4 motion to consider -- reconsider?

5 MR. MAPLES: Yes, Your Honor.

6 MR. PUTNAM: Yes, sir.

7 THE COURT: All right. And what ---

8 MR. MAPLES: It pertained to me only. That was ---

9 THE COURT: All right. So you still have -- you're still
10 supposed to provide answers to interrogatories since February
11 22nd, 21st [sic] and you have not shown me anything that
12 you've done that. Three months ago.

13 MR. PUTNAM: Well, what I -- what I said was is that not
14 knowing what the motion to reconsider was going to -- since
15 everybody agreed it was ambiguous and so forth, and I only had
16 two interrogatories, I think, that Mr. Campbell considered
17 incomplete, but they included information related to the
18 guardian ad litem and ---

19 MR. MAPLES: That's not true, Your Honor.

20 THE COURT: No, hold on. Let me listen to him. What
21 have you -- I'm going to ask you one more time, Mr. Putnam.
22 What additional answers to interrogatories have you provided
23 since February 22nd, 2021?

24 MR. PUTNAM: Well, I provided -- I provided a privilege
25 log to Mr. Campbell.

1 THE COURT: I'm not asking about documents. I'm asking
2 answers to interrogatories that lists witnesses and specific
3 questions he'd asked. Have you provided a response to that?

4 MR. PUTNAM: That was all previously provided.

5 THE COURT: Okay. Then I'm going to find you in contempt
6 of court because that was not what the question was. You have
7 -- you were ordered to file answers to interrogatories, and
8 you've not shown that you've done that. So I will -- I'll
9 find that you did not comply with the order. Is there
10 anything else you want to tell me?

11 MR. PUTNAM: Well, the -- again, the motion to compel was
12 filed before I had provided Mr. Campbell the rest of what ---

13 THE COURT: Well, ---

14 MR. PUTNAM: --- were remaining questions. So -- and so
15 there was nothing else in terms of the interrogatories ---

16 THE COURT: Then why did -- why did Judge Sprouse issue
17 an order that said you had to provide these responses?

18 MR. PUTNAM: I don't -- I don't know because ---

19 THE COURT: Well, that's the order -- that's the order I
20 have to go on. All right.

21 Now let's talk about the motion for summary judgment.
22 Mr. Maples, I'll hear from you on that.

23 MR. MAPLES: Yes, Your Honor. The motion for summary
24 judgment is very brief. Pursuant to Rule 56 defendants hereby
25 move for summary judgment on all remaining causes on the

1 grounds that -- concerning the pleadings and discovery in this
2 case. There's no genuine issue as to any material fact. And
3 defendant is entitled to a judgment in favor -- as a matter of
4 law to include legal fees in the amount of thirty-eight
5 thousand dollars (\$38,000.00).

6 THE COURT: What's the general basis? What are you
7 asking? I mean, what is the, I mean, I know that's the
8 standard and that's what the motion for summary judgment says,
9 but what law are you relying on that says that you're entitled
10 to judgment? And I realize you're not an attorney, but,
11 still.

12 MR. MAPLES: Yes, sir. Rule 37 (b) states that when
13 you're ordered as Mr. Putnam has been to provide discovery and
14 you violate a court order, then it clearly states that motion
15 for sanctions [sic] -- sanctions, excuse me, are appropriate.
16 So I'm asking for, as I had indicated earlier, I still owe
17 Chase Campbell eighteen thousand dollars (\$18,000.00). I've
18 paid about half ---

19 THE COURT: All right. Well, let me ask you this.
20 There's a little difference here. There's a motion for
21 sanctions, which is something that can be granted based on
22 failure of discovery. But is your motion for summary judgment
23 strictly based on his failure to provide discovery?

24 MR. MAPLES: Yes. Yes, Your Honor.

25 THE COURT: All right. Mr. Putnam, your response to

1 that?

2 MR. PUTNAM: Well, do you have my prehearing brief?
3 Pretrial hearing brief?

4 THE COURT: What date -- when was it filed?

5 MR. PUTNAM: Well, I sent it to your law clerk, your
6 secretary and all the defendants.

7 THE COURT: Have you -- has it not been filed?

8 MR. PUTNAM: It wasn't a prehearing -- I didn't file it
9 with the clerk, but ---

10 THE COURT: All I have -- what's been filed with the --
11 that's in the clerk's record, the public index.

12 MR. PUTNAM: Okay. Well, on April the 12th Mr. Maples
13 filed an affidavit. And that was also when he was referring
14 -- asking about his motion for summary judgment. He filed --
15 he filed an affidavit of service (technological interference)
16 that's in the record on April 12th. And he indicates that --
17 he signs it that he was the deponent that actually served that
18 motion on me. That's -- that motion -- that affidavit of
19 service was filed three minutes after he filed this motion.
20 So this is a fraudulent affidavit of service.

21 The next day, and it's in the record, it's time stamped
22 by being received by the Greenville County Sheriff's Office
23 Civil Division on April the 13th. And I went by and I got a
24 notice, a red tag on my door, and I picked that up the 23rd or
25 24th.

1 But I don't think it's -- I don't think it's a genuine
2 statement. I think everybody on this call knows that a party
3 to the case can't serve their own documents and provide an
4 affidavit of personal service.

5 THE COURT: All right. I'm not seeing what you're
6 talking about.

7 MR. PUTNAM: Well, it's in the April 12th filing.

8 THE COURT: I see a certificate of service by mail is the
9 only thing that pops up. That was April the 12th.

10 MR. MAPLES: Your Honor, everything was filed with Legal
11 Eagle. I'm not an attorney. And they assured me it was all
12 done properly. I've got a lot of this, stamped certificates
13 of service in front of me.

14 THE COURT: Okay.

15 MR. PUTNAM: Well, if you look at -- on April the 7th at
16 13:54 ---

17 THE COURT: All right.

18 MR. PUTNAM: --- there's -- I don't know why -- I don't
19 know why there's two duplicate filings. And as part of that
20 ---

21 THE COURT: All right. April 7th. Yeah, okay. You'd
22 mentioned April 12th. One's a motion for summary judgment and
23 one's a motion for sanctions. Motion for sanctions is April
24 the 12th.

25 MR. PUTNAM: Well, ---

1 **MR. MAPLES:** That's correct, Your Honor. I have it in
2 front of me.

3 **MR. PUTNAM:** If you look at the -- if you look at the
4 first filing on April the 12th, I'm sorry, April the 7th, that
5 13:54, you'll see a cover sheet that says it's -- the nature
6 of the motion is to join the hearing coming up on April 19th,
7 9:30. And the second page is his motion for summary judgment
8 of thirty-eight thousand dollars (\$38,000.00).

9 Well, the motion cover sheet doesn't say anything about
10 that. And his affidavits don't even reflect or even reference
11 this motion of thirty-eight thousand dollars (\$38,000.00).
12 That all -- that all that it says in his opinion, there's not
13 a genuine issue of material fact.

14 But in the time that we've been litigating this case,
15 they've not taken one deposition and they've not provided
16 affidavits from the people I've identified as going to provide
17 testimony. And I, you know, if he thinks he can serve his own
18 pleadings, I think that's inappropriate.

19 **MR. MAPLES:** Your Honor, we used Legal Eagle. And ---

20 **THE COURT:** All right. Let me -- I'll let you respond in
21 a minute. Mr. Putnam, anything else in response to the motion
22 for summary judgment?

23 **MR. PUTNAM:** You know, I think it's not a proper format.
24 And I can provide the Court the correspondence with Mr.
25 Campbell. And, you know, I do not know what was provided to

1 Mr. Maples that was provided to Mr. Campbell during that --
2 during that time and including after the judge's order.

3 And, you know, not even being able to go over to provide
4 the documents at their office. They told me not to come by
5 and not really to come on their property other than they
6 wanted me to sign that consent to be relieved of counsel.

7 The other -- the other thing, Your Honor, is that every
8 interrogatory, requests for admissions, requests for
9 production and -- all of those were signed by Chase Campbell.
10 And I have no -- there was never an acclamation that Mr.
11 Maples even looked at those documents.

12 MR. MAPLES: Of course I looked at them.

13 THE COURT: Well, hold on. Anything else on -- I'm
14 hearing about your motion for summary judgment. We're past
15 the discovery stuff.

16 MR. PUTNAM: Well, I think it should be denied because I
17 don't think that the proper order ---

18 THE COURT: All right.

19 MR. PUTNAM: I don't think -- I don't think a motion just
20 asking for thirty-eight thousand dollars (\$38,000.00) in
21 attorney fees is an appropriate motion for summary judgment
22 where there's not been any evaluation of the merits of the
23 case.

24 THE COURT: All right. Mr. Maples, any response?

25 MR. MAPLES: Yes, Your Honor. You know, as I mentioned,

1 I'm not an attorney. I do know the part that Mr. Putnam
2 leaves out. He is by definition a vexatious litigant. He's
3 filed 70 motions, about 50 in family court that I'm still
4 spending money on with attorneys. I simply can't continue to
5 live my life like this.

6 And, you know, the other part of the order I failed to
7 mention to you is he was also ordered to provide financial
8 documents. He is suing me, that he can't work, he can't do
9 this, can't do that.

10 And he can say that something was provided to Chase
11 Campbell. Chase -- I can get an affidavit. Nothing was sent
12 to me. Nothing was sent to -- I know we're past that point.

13 But, you know, all of Wake Christian's been exonerated.
14 This thing went to federal court. There's been five
15 amendments. And, you know, what I'm dealing with is a -- is a
16 legal bully. This man has harassed me, my family. And I just
17 need this to stop for my well-being.

18 You know, I'm a guy that gets up at 5:30 and goes to
19 work. I don't get to sit around and play law and get help
20 from law firms in Greenville. And I'd just beg for, you know,
21 this to end both with summary -- now, I will tell you there is
22 mediation on the horizon. I would ask that mediation be
23 cancelled, rejected as well, that this case ends today.

24 And, finally, it's, you know, for -- an 82-year-old
25 doesn't deserve this either. And my father-in-law and I are

1 the only ones that haven't been exonerated from a Christian
2 school. So this is just ludicrous, it's unfair, and it's not
3 just.

4 And law -- Rule 37 (b) says that sanctions are
5 appropriate. If I had to choose one or the other, I would --
6 if you just end this case with a restraining order that this
7 man can't continue to file frivolous motions against not only
8 me and others. He has sued Prisma Health and others. That's
9 -- that would be my desire.

10 THE COURT: All right. Well, since all of this is --
11 there's a lot of documents that have been referred to and a
12 lot of motions, a lot of orders, I'm going to review this
13 file, and I'll come up with -- I'll let you know what I come
14 up with.

15 MR. MAPLES: Thank you, Your Honor.

16 THE COURT: All right. Mr. Putnam, we'll be -- you'll be
17 notified.

18 MR. PUTNAM: Thank you, Your Honor.

19 (Hearing Ended at 3:48 pm)

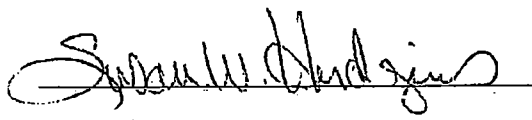
20 (End of Requested Transcript of Record)

Certificate of Reporter

I, the undersigned, Susan W. Hudgins, Official Court Reporter for the Thirteenth Judicial Circuit of the State of South Carolina, do hereby certify that the foregoing is a true, accurate, and complete transcript of record of all the proceedings had and evidence introduced in the trial/hearing of the captioned case, relative to appeal, in the Circuit Court for Greenville County, South Carolina, on the 12th day of May 2021.

I do further certify that I am neither of kin, counsel, nor interest to any party hereto.

September 3, 2021


Circuit Court Reporter

State of South Carolina)
County of Greenville)

In The Court of Common Pleas
Thirteenth Judicial Circuit
2020-CP-23-1450

Michael Gene Putnam,)
Plaintiff,)
vs.)
Wake Christian Academy,)
et al.,)
Defendants.)

Transcript of Record

November 15, 2021
Greenville, South Carolina

B E F O R E:

The Honorable Perry H. Gravely, Judge

A P P E A R A N C E S:

Michael Gene Putnam
Self-represented Litigant

Douglas A. Churdar, Esquire
Attorney for Defendant Maples

Elizabeth B. Harris, CVR-M-CM
Circuit Court Reporter

I N D E X

<u>Witness/Description</u>	<u>Page No.</u>
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Certificate Page.	30
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E X H I B I T S

<u>No.</u>	<u>Description</u>	<u>Ev.</u>
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No exhibits introduced.

1 THE COURT: All right, we have defendant Maples's
2 motion to strike, then we have plaintiff's motion to
3 compel, and defendant's motion for summary judgment. So,
4 let's just go in the order they are. Defendant Maples's
5 motion to strike.

6 MR. CHURDAR: Judge Gravely, may I approach?

7 THE COURT: Yes.

8 MR. CHURDAR: And I have a copy of the order that Your
9 Honor issued, and I've highlighted some stuff and put some
10 numbers on there I'm going to talk about.

11 THE COURT: Yes. Be glad to hear from you.

12 MR. CHURDAR: All right. Good morning, Judge Gravely.
13 Well, Your Honor, I think just as the background, I think
14 the court is familiar, as are a number of other judges,
15 familiar with this particular case. In this particular
16 case, Mr. Putnam is suing his ex-wife's husband and
17 father-in-law for defamation, and I think it's important
18 for the court to recognize -- I know that Mr. Putnam has
19 been before the court before, but in, in, in analyzing his
20 conduct, I think it's important for the court to recognize
21 that Mr. Putnam is intelligent. He's well-educated. He
22 holds a CPA, and he's also a prolific litigator.

23 So, we have before the court a motion to strike which
24 may also, before we end our discussion, end up being a
25 motion for -- characterized as a motion to dismiss or for

1 default or whatever. But as the court has acknowledged in
2 a prior order, Rule 37(b)(2)(c) allows the court to strike
3 or dismiss or default a case when there's been discovery
4 abuse, sufficient discovery abuse to warrant it.

5 And what the court -- and, and we're here because on
6 May the 17th of 2021, Your Honor had this very case in
7 front of him. Judge Sprouse had ordered Mr. Putnam to give
8 complete answers to interrogatories and other discovery
9 requests in a, in a hearing on February 22nd of 2021, and
10 this court found in May of 2021 that he had not done so.
11 He had not provided complete answers to interrogatories to
12 Mr. Maples.

13 Now, we're here asking for a harsh remedy, but I think
14 it's obvious from reading this order, it's obvious from the
15 research that I have done that this harsh remedy is not
16 only warranted. It's also been -- it looks like it was
17 contemplated by this court, and I feel confident that an
18 appellate court would in no way find that the discretion of
19 the court would, would be abused by dismissing this case
20 against Mr. Maples.

21 THE COURT: You must have a heck of a crystal ball
22 there, Mr. Churdar.

23 MR. CHURDAR: I do actually, but anyway, Your Honor,
24 I'll say, you know, first thing is that, you know, the
25 courts say that before a case can be dismissed or defaulted

1 under Rule 37(b) (2) (c), the court needs to determine that
2 bad faith has occurred. And this court found -- I, I put a
3 little number 1 by it:

4 The court finds ---

5 This is Your Honor back in May.

6 --- that the plaintiff has intentionally and
7 willfully violated the order of Judge Sprouse,
8 and the court must fashion an appropriate
9 sanction.

10 Then because in Judge Sprouse's order, he had not let
11 Mr. Putnam know that he could actually have his case
12 against Mr. Maples dismissed, this court found that the
13 summary judgement or dismissal back in May would be too
14 draconian, mentioning, of course, that Judge Sprouse did
15 not set forth the possibility of dismissal for
16 noncompliance as stated in Judge Verdin's order, which this
17 court then resolved that issue by making it clear that his,
18 his case could be dismissed. Then this court -- and we,
19 we, we here reference in this *Balloon...*

20 THE COURT: *Plantation.*

21 MR. CHURDAR: *Balloon Plantation* case about the
22 shotgun versus the rifle shot, and I would say then this
23 court gave Mr. Putnam a ---

24 THE COURT: Do you see who the attorney was on that?

25 MR. CHURDAR: I did notice that; I did notice that.

1 The respondent, unfortunately, the respondent, by the way.

2 But anyway, Judge Gravely, you, you gave him a flesh
3 wound since we're -- as we, as we will continue the
4 analogy, a mere flesh wound with a \$2750 sanction which he
5 was to pay within twenty days, and then warned him at, at
6 the bottom that if he continues not to give these complete
7 answers to the interrogatories within twenty days,
8 additional sanctions will be warranted, including the
9 dismissal of his complaint. Now, here we are six months
10 later, almost a year, ten months, nine or ten months later
11 since Judge Sprouse's order. Still hasn't given Mr. Maples
12 or me anything.

13 So, we got this case; it just keeps going on. He's
14 alleging -- you know, he's not given us any financial
15 information but, but even more importantly, we've asked,
16 hey, who did Mr. Maples defame you to? You know, who, who
17 did he defame you to? What did he say? When was it? This
18 is virtually nothing and so we have nothing since Your
19 Honor's order.

20 So, we believe -- and, and to be clear, borrowing from
21 *Balloon Plantation*, we are asking for a rifle shot here,
22 not a shotgun, and so we're not -- we're just asking for
23 dismissal of Mr. Putnam's case against this defendant, who
24 has not gotten the discovery that was the subject of this,
25 of this order, and he is the aggrieved party.

1 THE COURT: Let me ask you this. Has anything been
2 provided since the May 17th order?

3 MR. CHURDAR: Nothing.

4 THE COURT: No -- even objections, no ---

5 MR. CHURDAR: Nothing.

6 THE COURT: --- cursory responses?

7 MR. CHURDAR: Nothing and, and, and as, as I said, you
8 know, Your Honor, I've looked at all the cases, including
9 -- I looked at all the cases involving dismissal and, and
10 -- under these circumstances and I, I, I cannot even
11 imagine an appellate court would find this court has abused
12 its discretion by dismissing a case when, when Mr. Putnam's
13 given so many -- been given so many opportunities and so
14 many explicit warnings and has been sanctioned six months
15 ago and, and still has not responded.

16 THE COURT: Has he paid the fees?

17 MR. CHURDAR: He did.

18 THE COURT: He did pay that?

19 MR. CHURDAR: He did.

20 THE COURT: All right, Mr. Putnam, why, why have you
21 not -- or tell me how you've complied with my order of May
22 17th.

23 MR. PUTNAM: Well, Your Honor, thank you for hearing
24 this. You probably don't recall because you have so many,
25 you know, cases and so forth, but in that virtual hearing

1 in May, my -- I lost my internet connection after about one
2 minute. I had to call in on my cell phone to the court and
3 tried to, tried to make my case as best I could. Frankly,
4 I think you got pretty frustrated with my, my ---

5 THE COURT: Well, let me ask you. Let's go forward.
6 What have you done to comply with my order of May the 17th?

7 MR. PUTNAM: Well, the discovery which I was
8 sanctioned for not providing had already -- he had
9 terminated his -- Mr. Maples had terminated his
10 relationship with Chace Campbell, and that discovery had
11 already been provided to Chace Campbell. So, when you
12 asked me directly, you said I want a yes or no question.
13 Have -- since this order, have you provided, and I
14 certainly was not going to lie to the court and say yes, I
15 have because -- I said no, I haven't because, and you
16 interrupted me and said, well, I'm finding you in contempt,
17 and this 2750 ---

18 THE COURT: Let me ask you this. Have you provided
19 anything to Mr. Maples or his attorney since my order of
20 May 17, 2021?

21 MR. PUTNAM: Well, Mr. Maples has been pro se since
22 ---

23 THE COURT: Well, either one of them.

24 MR. PUTNAM: Okay. Well ---

25 THE COURT: Since May the 17th, 2021 when I issued my

1 order.

2 MR. PUTNAM: Well, if, if -- Mr. Maples, while he was
3 pro se, he does not accept certified mail. He does not
4 accept registered mail. I mailed documents to him. I
5 mailed pleadings to him, and they simply -- he doesn't
6 bother to go to the post office to pick, to pick the
7 material up, and I don't think I should be prejudiced by
8 the fact that -- I, I do take my role in this case as
9 seriously as I possibly can, and I try to obey the court's
10 rules and study as much as I can. But Mr. Maples just
11 chose to put his head in the sand for the whole summer, and
12 all of this stuff came back and, you know, I don't -- like
13 in the case of restricted mail -- and I've actually got
14 three other envelopes that -- I don't know if I didn't
15 happen to bring -- but, yes, I have attempted to provide
16 additional discovery and additional information, additional
17 answers.

18 THE COURT: Have you filed anything with the court
19 showing that you filed that? What do the rules say about
20 how you can serve discovery responses to somebody?

21 MR. PUTNAM: Well.

22 THE COURT: By regular mail. Once it's put in regular
23 mail, it's been deemed served.

24 MR. PUTNAM: Okay, but, but ---

25 THE COURT: Hand deliver, you could have hand

1 delivered it. Now, how long has Mr. Churdar been on the
2 case?

3 MR. PUTNAM: Well.

4 MR. CHURDAR: Your Honor, I made a notice of
5 appearance in the summer. August, early August.

6 THE COURT: At any time since August, have you tried
7 to send anything to Mr. Churdar?

8 MR. PUTNAM: Well, three days after Mr. Churdar made
9 an appearance in the case, he filed the motion to strike
10 and ---

11 THE COURT: Well, I'd have run over to his office
12 right then. If your complaint's subject to being --
13 strike, you could have run over there and given him
14 everything that you needed to be given him.

15 MR. PUTNAM: Well, honestly, I have no way of knowing
16 between when Mr., Mr. Campbell, when he was terminated,
17 what he provided Mr. Maples or not, and they've not
18 provided -- I, I, I've got supplemental discovery requests
19 to Mr. Maples that he's never responded to, and I'm very
20 specific in my requests. Please look at interrogatory 8.
21 Please look at production number 2. Please look at this.
22 I've gotten nothing from them telling me what it is that
23 they believe is deficient in my responses. And to simply
24 take all the interrogatories and all the discovery requests
25 and just try to shotgun guessing what they think they're

1 missing I don't think is an appropriate way to address it.
2 There's no reason ---

3 THE COURT: Let me ask you this. We had about an hour
4 and a half delay this morning because of a court reporter
5 getting sent. In that hour and a half, did you go over to
6 Mr. Churdar, say here's all the stuff I've been trying to
7 send your client. This should satisfy the judge's order of
8 May the 17th. Did you do that this morning, Mr. Putnam?

9 MR. PUTNAM: I did not see Mr. Churdar.

10 THE COURT: You saw Mr., you saw Mr. Maples, didn't
11 you?

12 MR. PUTNAM: I didn't see Mr. Maples.

13 THE COURT: And then I've sitting in here all morning
14 just like everybody else.

15 MR. PUTNAM: Well, Your Honor, I, I, I have a binder
16 that I -- because some of these have come back within the
17 last two weeks, and I've been putting all this stuff in a,
18 in a, in a binder. But there's no way after just three
19 days being on the case he could make an assertion that he
20 had been able to review all the discovery that had been
21 provided and make an assertion that I had not provided it.
22 That's just not, that's just not realistic. I provided
23 over 1200 pages of discovery in binders at the end of
24 April.

25 THE COURT: Well, he could very easily look and see if

1 you had filed -- I mean, my order's very specific of May
2 the 17th, and he could very easily determine whether
3 anything had been provided after May the 17th.

4 MR. PUTNAM: Well, in fact, the contents of several of
5 these letters are after May 17th.

6 THE COURT: And have been provided to them?

7 MR. PUTNAM: Yes, sir.

8 THE COURT: Not, not been returned but has -- you have
9 -- but they've not been provided?

10 MR. PUTNAM: Well, not, not every one came back, but I
11 do send certified mail so I could file an affidavit with
12 the court.

13 THE COURT: What have you sent them that has not come
14 back since May the 17th?

15 MR. PUTNAM: These are dated July the 6th, May the
16 19th, which was ---

17 THE COURT: Are those the ones that came back to you?

18 MR. PUTNAM: Yes, sir.

19 THE COURT: Did you send any that did not come back to
20 you?

21 MR. PUTNAM: Well, if it, if it -- if I sent it
22 certified mail and it didn't come back, I assume that it
23 was received.

24 THE COURT: You don't get a little something back from
25 the post office that says whether it was received?

1 MR. PUTNAM: I, I get what's called electronic
2 discovery. So, yes, I can ---

3 THE COURT: Do you have that information?

4 MR. PUTNAM: I can print that out from the ---

5 THE COURT: Do you have that information to provide to
6 the court that you've sent them something since May the
7 17th? It's a pretty important question.

8 MR. PUTNAM: I've sent Mr. Maples ---

9 THE COURT: I'm saying do you have any evidence that
10 says you have sent -- that -- sent any of these people and
11 they've received them since May the 17th of 2021?

12 MR. PUTNAM: Well, I'm holding envelopes dated July
13 and August.

14 THE COURT: That have not been accepted?

15 MR. PUTNAM: That, that, that have been, that have
16 been returned. And, in fact, on the, on the docket
17 register now, Mr. Maples's address is Concorde, North
18 Carolina. I've inquired as to Mr. Churdar whether he, in
19 fact, has moved to Concorde, North Carolina. I've not
20 gotten a response on that.

21 THE COURT: Well, I mean, now at this point, don't you
22 have to -- you're supposed to be responding to Mr. Churdar
23 anyway, aren't you? He's the attorney of record as of
24 August.

25 MR. PUTNAM: Yes, but if there, if there was a matter

1 of personal service, I would need to send that, too.

2 THE COURT: Once the complaint's been done, I mean,
3 everything goes through the attorney.

4 MR. PUTNAM: Including a, like, a rule to show cause?

5 THE COURT: Anything goes through the attorney from --
6 yes. Once an attorney is on record, that's who you need to
7 be addressing. You don't need to be going to the
8 individual.

9 All right, so your last, last time. What do you have
10 to show that they have gotten any of the information since
11 May the 17th of 2021?

12 MR. PUTNAM: Well, I've got ---

13 THE COURT: That's not my -- listen to my question,
14 Mr. Putnam. What do you have to show that they have gotten
15 the information that you were required to provide them in
16 my previous order?

17 MR. PUTNAM: I sent, I sent all the material that I
18 had previously supplied again by email and, and sent that
19 to Mr. Maples and Mr. Churdar.

20 THE COURT: When was that?

21 MR. PUTNAM: Well, I'd have to review my email
22 history.

23 THE COURT: Mr. Churdar, have you gotten an email from
24 Mr. Putnam?

25 MR. CHURDAR: No, Your Honor, I haven't, and I think

1 the court should know I met Mr. Putnam out in the hall over
2 an hour ago. We talked. Moreover, moreover, all of the
3 documents that he has notarized, he has notarized by a
4 woman who he has a prior relationship with who works
5 downstairs in Kim Varner's office. I mean, I'm literally
6 in the same building. He comes in there; he's been in
7 there routinely since August. Never brought me anything.
8 Never tried to resolve this in any way, shape, or form.

9 And finally, to the extent there was any question,
10 when I filed the motion to strike, I could -- I dated -- I,
11 I provided him the dates of the orders he was failing to
12 comply with. There's been nothing, zero.

13 MR. PUTNAM: The dates, the dates of the order and the
14 specific orders didn't specify what was lacking or had not
15 been previously provided. And again, there's probably been
16 almost 2000 pages of discovery provided.

17 And, you know, he says I met, met him this morning in
18 the hallway. I didn't know who he -- I didn't -- I was
19 wearing my mask. He was wearing his mask; I didn't know
20 who he was. I asked him if, if he was with Mr. Churdar's
21 firm.

22 And you acknowledged that you were.

23 But that -- we didn't, we didn't discuss, and he went
24 -- he was -- said he had to go off to the bathroom, and so
25 I didn't see, I didn't see him again.

1 THE COURT: All right, I'm going to move on to this --
2 I'm going -- since we have two other motions on here, I'll
3 be glad to -- I'm going to take all this under advisement
4 before I make a ruling.

5 Motion for summary judgment, I'll hear from you. Then
6 I'll hear your motion to compel.

7 MR. PUTNAM: Okay, can I, can I make one more
8 statement related to his motion?

9 THE COURT: Yes.

10 MR. PUTNAM: On August the -- three days after he
11 assumed -- made an appearance, he sent an email. I had --
12 my deposition was scheduled. A deposition of Gale
13 Purkerson was scheduled and Mr. Churdar, three days after
14 he made an appearance, said is there an urgency for this.
15 My October is bad as I'm preparing for a one-and-a-half
16 week trial in federal court beginning November 1st. Can
17 we, can we proceed later? And that was -- can we proceed
18 some time after November 15th, which ironically is today.
19 So, he wrote, he wrote a note to all parties saying I'm not
20 going to be available to do depositions or do anything else
21 because I'm going to be tied up until November 15th.

22 And I think for him to come in here and say -- he, he
23 takes on the client, but he knows when he takes on the
24 client that he's not going to be able to participate in any
25 discovery which is already on -- scheduled for depositions

1 and so forth until November 15th. I, I don't think that's
2 a sincere effort at trying to proceed with discovery that's
3 already been scheduled and so forth.

4 THE COURT: Mr. Churdar, do you want to respond to
5 that?

6 MR. CHURDAR: I think that might be relevant to the
7 argument on the motion for summary judgment. It doesn't
8 have anything to do with the motion to dismiss, strike,
9 default, whatever. My case settled, thankfully, but he was
10 trying to schedule a deposition and I was just not -- I
11 didn't have time for it at the moment.

12 Regarding the motion for summary judgment, Your Honor,
13 Mr. -- so, so, we filed a motion for summary judgment.
14 Referenced the allegations made by Mr. Putnam, which this
15 case was really filed a year and eight months ago. There
16 was one filed even before that, and he's alleging that Mr.
17 Maples has said bad things about him to certain people,
18 false things, defamed him, and he's -- he -- he's never --
19 you know, and, and part of the reason we filed the motion
20 to strike or dismiss is because he's never produced any
21 evidence of what has been said, where it's been said, who
22 it's been said. Just the pleadings, very, very vague
23 pleadings. So, I thought I, I would give the court an
24 additional basis or maybe a separate basis to dismiss his
25 case against Mr. Maples.

1 He's had a lot of time. Now, I'll grant you. He has
2 attempted to take the deposition of his ex-wife but beyond
3 that, there's really nothing that he's done that is
4 realistically going to produce any evidence. He's named
5 some people in, in, in, in opposition to this motion. He,
6 he hasn't brought an affidavit from somebody saying Mr.
7 Maples said this or that about you, absolutely nothing.
8 All he's done is submit an affidavit saying that Mr.
9 Maples's affidavit wherein he says I haven't even talked
10 about this guy, said these negative things about him. He
11 just says that's a lie for this and this and this reason.

12 Also makes a big point and spends his entire, like,
13 four pages of his memorandum pointing out the fact that I'm
14 referencing his original complaint when he has filed an
15 amended complaint which makes the original complaint void.
16 And so, therefore, you know, the motion for summary
17 judgment can't be granted for that reason.

18 I would, I would submit to the court that his response
19 to the motion for summary judgment would either need to be
20 an affidavit of, of a witness, or some evidence supporting
21 his claim for defamation, or even an affidavit of himself
22 as, as many lawyers sometimes do: I haven't had enough
23 time; if I could take this person's deposition, I will get
24 this information for the court. There's none of that. All
25 it is, is, is basically just regurgitating his pleadings

1 and saying that Mr. Maples's affidavit is a lie because of
2 -- because he just knows it is.

3 MR. PUTNAM: And that's, that's just absolutely ---

4 THE COURT: I'll let him -- I'm going to let him
5 finish, and then I will listen to you.

6 MR. CHURDAR: So, you know, we, we've had, we've had
7 sufficient time, and I would ask the court to grant summary
8 judgment as an alternative to or maybe in addition to the
9 motion to dismiss.

10 THE COURT: Mr. Putnam, what evidence do you have that
11 any of these false statements have been published?

12 MR. PUTNAM: In my affidavit in response to -- in
13 opposition to their motion for judgment, summary judgement,
14 I have attached a number of exhibits where Mr. Maples says,
15 well, I only met with Mr. Hoxie ---

16 THE COURT: Okay, I'm asking a very pointed question.
17 What evidence do you have? I'm not talking about his
18 evidence. What evidence do you have that Mr. Maples has
19 published any false statements about you?

20 MR. PUTNAM: Because in my affidavits, his emails,
21 quote, that I shared with Mr. Hoxie, the principal who
22 ended up reporting me for a sex crime investigation. He
23 had, he had -- he says he only met with him one time, but
24 then in another email he says me and my wife met with him.
25 We showed him all these documents and so forth, and I'm

1 sure he's going to find you're not credible, you drug-
2 abusing alcoholic.

3 So, he can't have it both ways. He can't say he met
4 one time and discussed pick -- picking up the child, what
5 the procedures were, and then in another email he and his
6 wife meet with Mr. Hoxie shortly before the DSS
7 investigation is started.

8 THE COURT: Do you have information that says that he
9 said anything to Mr. Hoxie at that time?

10 MR. PUTNAM: He says it.

11 THE COURT: He says that he says these false
12 statements about you?

13 MR. PUTNAM: He said I shared, we shared with Mr.
14 Hoxie all these emails, and then he also forwarded and
15 copied my baby sister on all of that, which just further
16 spreads the junk. And now that Mr. Maples has and Mr.
17 Purkerson have filed an unredacted copy of the sex crime
18 investigation on the public index, my name, my daughter's
19 name appears in hundreds of searches.

20 And it's just -- and it is, and it's -- and Title, I
21 think it's Title 56 as to my report, my investigation was
22 unfounded. Unfounded investigations are not supposed to be
23 even subject to the Freedom Of Information Act. I've
24 talked to the people at the sheriff's department. She
25 says, well, I'm the only one that got it. There was

1 testimony at a family court hearing, a trial, contempt
2 trial in late September where it was admitted and
3 acknowledged that she had obtained -- or that Mr. Maples
4 had obtained the sex crime, unredacted sex crime
5 investigation, twenty-seven pages of absolutely -- stuff
6 that makes you want to throw up, and they, they put it on
7 the public index.

8 I've written Mr. Maples letters telling him please
9 pull that information off. He's failed to do so, and the
10 list of, of Google sites and so forth where my daughter has
11 now been pulled in and her name, full name is sitting out
12 there on Google search results.

13 And I've got to address that separately. I've met
14 with SLED. I've met with Mr. Wilkins's office and -- who
15 -- it was forwarded from SLED and that's -- that
16 investigation is pending right now.

17 But in terms of the -- his motion for -- to strike,
18 he's ---

19 THE COURT: No. We're in the motion for summary
20 judgment now.

21 MR. PUTNAM: Okay. Well, in a motion for summary
22 judgment, all I've got to do -- and I've never seen a
23 scintilla. I don't know really what size that would be,
24 but I assume it would be pretty small. But all I have to
25 do is show that there's a scintilla of evidence that

1 supports my assertions in the complaint. And I do believe
2 the fact that they responded to a complaint that had been
3 superseded as a matter of course, not required by leave of
4 the court but within thirty days after filing it, that if
5 -- certainly if there were a 12(b) motion to dismiss filed
6 fifteen days after they received the complaint and I filed
7 an amended complaint, that motion to dismiss ---

8 THE COURT: All right.

9 MR. PUTNAM: --- would be gone.

10 THE COURT: Again, I'm going to -- I want to zero in
11 on the evidence that you're saying that you have produced,
12 that you have provided evidence that specifically addresses
13 the issues in your complaint.

14 MR. PUTNAM: And it's, and it's in the, in the
15 exhibits submitted to the court.

16 THE COURT: All right, Mr. Churdar.

17 MR. CHURDAR: Your Honor, he talks about this
18 discussion with Mr. Hoxie and, and in support of that, he
19 submits an affidavit from Mr. Maples to himself that says:
20 We showed Mr. Hoxie all the texts of you slamming his
21 school's credibility. That's, that's his evidence of
22 defamation, we showed another person that you're slamming
23 his school's credibility. And then Mr. Maples says to Mr.
24 Putnam: I am quite sure he will not be moved by you, the
25 drug-abusing alcoholic. So, Mr. Maples is calling Mr.

1 Putnam name -- names to him, to him. That's it. That's,
2 that's what he's attached. He has nothing, not a
3 scintilla. Nothing and ---

4 MR. PUTNAM: Was that forwarded to my sister?

5 MR. CHURDAR: I have no idea. If it was, that's ---

6 MR. PUTNAM: You don't have the email that you ---

7 MR. CHURDAR: I have the email.

8 Your Honor, I have the email from Mr. Maples to Mr.
9 Putnam.

10 MR. PUTNAM: Does, does my sister's email address
11 appear on there?

12 THE COURT: Well, this is -- do you have information
13 ---

14 MR. CHURDAR: No.

15 THE COURT: --- that shows that was forwarded to your
16 sister?

17 MR. PUTNAM: Yes. It's on the, it's on the face of
18 the email, and he says forwarded to Ginger so she could see
19 what a disgusting, lousy person you are, in so many words.

20 MR. CHURDAR: There is no evidence that this was
21 forwarded to Ginger. He said something that says forwarded
22 all to Ginger. I don't know what that is.

23 MR. PUTNAM: Well, all is a very ---

24 THE COURT: Do you have any information it was
25 forwarded to Ginger?

1 MR. PUTNAM: Yes. My sister.

2 THE COURT: Evidence, do you have evidence that you've
3 presented to this court?

4 MR. PUTNAM: In his request, in, in his
5 interrogatories response, I asked who he had talked to in
6 the last two years about this whole defamation matter, and
7 he names one person: my sister. Really. In two years of
8 litigation, the only person he's talked to about the
9 litigation is my sister. That is not credible, and
10 credibility should play a role in this.

11 And, and in the, and in the -- in his request to
12 admit, I say: Please verify that you have shared
13 information with representatives at my daughter's school.
14 And he just replies: Denied. Well, he's got two, two
15 emails saying I met with them.

16 THE COURT: Well, they denied it, but you don't have
17 -- okay. All right. I'm going to have -- I'm going to
18 look at the file on that.

19 All right, let's go through your motion to compel and
20 that -- I guess it's to compel Google or I'm not -- I
21 couldn't quite...

22 MR. PUTNAM: Is it possible to get a little bit of
23 water?

24 THE COURT: I think they took all the water out for
25 COVID.

1 MR. PUTNAM: Did you get my prehearing brief?

2 THE COURT: I did. If this is -- I mean, exactly tell
3 me what you are requesting. I know that it had information
4 from Google about some emails, but I really kind of -- your
5 flowchart didn't quite give me the information I needed.

6 MR. PUTNAM: Well, when I was ---

7 THE COURT: I mean, who are you compelling to do what?

8 MR. PUTNAM: In a -- Google obviously is a, is a large
9 corporation that refuses to do anything. I've been
10 hassling those guys for a year and a half. Every time I
11 send them a subpoena ---

12 THE COURT: What are you asking?

13 MR. PUTNAM: Okay. All right.

14 THE COURT: Get to the point.

15 MR. PUTNAM: On July 21st, Judge Verdin, as well as
16 previous to that Judge Hocker, denied their motion to quash
17 the subpoenas. Judge Verdin said, Mr. Putnam, please do
18 this with the subpoenas. Please redo them and direct that
19 the materials be sent directly to my office for a in-camera
20 review.

21 THE COURT: Okay.

22 MR. PUTNAM: That's in her July 21st order. So, I
23 redid the subpoenas; I sent them to Google. Google sent
24 back and said that won't work for us. We need an
25 independent person to send it to who can get the

1 information. Mr. Thames appeared, who's in IT and his CV
2 is, is attached to my documents. He works for Legal Eagle,
3 has an association with them and has been accepted by
4 numerous courts in South Carolina as an IT expert. I have
5 no relationship with him and -- sorry. Still got the dry
6 mouth.

7 THE COURT: I think she went to get you some water.

8 MR. PUTNAM: But they said -- and we had a -- they had
9 -- they scheduled a call on Wednesday a week ago. They
10 didn't tell me when. I just said I'd be available
11 Wednesday and ---

12 THE COURT: So, what do you need from me? You need to
13 get ---

14 MR. PUTNAM: Okay.

15 THE COURT: --- to the point here.

16 MR. PUTNAM: So, so, what I need you to do is to
17 compel the defendants to provide Mr. Thames the brief
18 information he needs about their email address, and he can
19 request that information from Google using their
20 proprietary download solutions. And then without any
21 modifications or anything else, he can forward that
22 directly to Judge Verdin.

23 THE COURT: All right, Mr. Churdar.

24 MR. CHURDAR: Your Honor, just for the record, Judge,
25 Judge Verdin did not direct him to do anything other than

1 if he filed more subpoenas regarding these emails -- and
2 he's looking for two or three years worth of emails, and he
3 wants to dump them on Judge Verdin and have her decide
4 which ones are relevant to this case.

5 This, by the way, has not been preceded by a request
6 for emails through her -- through Mr. Maples's lawyers,
7 which is the way it's normally done. But he got shot down
8 by Google and Hotmail, and now he's asking for the court --
9 and this was not made clear in the motion what he -- what
10 he was -- I, I wasn't sure what he was asking for either.
11 So, this is the first time I've come to really understand
12 what he wants is for my client to give this third party
13 we've never met, don't know, some information to get into
14 his Google account and then let this process begin, which
15 would still result in two or three years worth of emails
16 being dumped on Judge Verdin to review, I guess, or, or her
17 clerk. But, Your Honor, my, my client is not inclined to
18 give his personal information to, to this third party.
19 This has, this has not been explained, but it's, it's not
20 something he should be required to do.

21 I would say this is a fishing expedition, but I think
22 it's worse than that. It's just, just trying to dig
23 through two or three years worth of email in hopes of
24 finding something where Mr. Maples said something negative
25 about, about Mr. Putnam. But in any event, my, my client

1 is not inclined to do that obviously unless ordered to do
2 that.

3 But Mr. Putnam has not requested something like, you
4 know, any emails that mention Mr. Putnam's name or any
5 emails that, you know, that discuss a, a, a sex crime
6 investigation against Mr. Putnam or, or anything like that.
7 And so I think that, that having, having this third party
8 go in and get three years worth of emails is, is overkill
9 to say the least.

10 MR. PUTNAM: Mr., Mr. Thames is just a conduit that

11 ---

12 THE COURT: I understand what he is.

13 MR. PUTNAM: --- allows, allows Google to avoid
14 violation of the federal communications law, according to
15 them. And in an email which was also sent to Judge
16 Verdin's office by Google, they explain all that. And so
17 we're ready to proceed, you know, when -- whenever you are.
18 Mr. Thames is not going to review the emails. He's just
19 going to be a conduit.

20 And when, when he says that Judge Verdin didn't ask me
21 anything, there was no way to re-ask Google and Microsoft
22 to modify the request in the, in the discovery without
23 making changes to the subpoena to direct that the
24 information be sent directly to Judge Verdin, which is what
25 I did. I've gone through a heck of a time in California

1 trying to get these subpoenas domesticated, and I finally
2 did in Santa Clara.

3 THE COURT: I saw that. So, all right, anything else?

4 MR. PUTNAM: The last thing I would say, again, is I,
5 I believe there's substantial case law that, that, that
6 says responses or pleadings or motions as to a complaint
7 that is no longer in effect and has been superseded is --
8 makes that motion moot and should not even be considered by
9 the court.

10 THE COURT: All right. All right, I'll take this
11 under advisement and let y'all know what I come up with.

12 MR. CHURDAR: Your Honor, one other thing. I'm sorry.

13 THE COURT: That's fine.

14 MR. CHURDAR: I did, I did make a note to myself. If,
15 if, in fact, the court grants the sanction of dismissal or
16 default or strikes the complaint against Mr. Maples, I
17 would like for the issue of attorney fees as an additional
18 sanction to be kept open.

19 THE COURT: All right. Thank you.

20 MR. CHURDAR: Thank you.

21 MR. PUTNAM: Thank you.

22 --- END OF TRANSCRIPT OF RECORD ---

CERTIFICATE

I, THE UNDERSIGNED ELIZABETH B. HARRIS, CERTIFIED
VERBATIM OFFICIAL COURT REPORTER FOR THE FIFTH
JUDICIAL CIRCUIT OF THE STATE OF SOUTH CAROLINA, DO
HEREBY CERTIFY THAT THE FOREGOING IS A TRUE, ACCURATE
AND COMPLETE TRANSCRIPT OF RECORD OF ALL THE
PROCEEDINGS HAD AND EVIDENCE INTRODUCED IN THE HEARING
OF THE CAPTIONED CAUSE, RELATIVE TO APPEAL, IN THE
CIRCUIT COURT FOR GREENVILLE RICHLAND COUNTY, SOUTH
CAROLINA, ON THE 15TH DAY OF NOVEMBER, 2021.

I DO FURTHER CERTIFY THAT I AM NEITHER OF KIN,
COUNSEL, NOR INTEREST IN ANY PARTY HERETO.

/S/Elizabeth B. Harris, CVR-M-CM

COLUMBIA, SOUTH CAROLINA

OCTOBER 17TH, 2022

STATE OF SOUTH CAROLINA)
) COURT OF COMMON PLEAS
) 2020-CP-23-01450
COUNTY OF GREENVILLE)
)
)
)
)
MICHAEL GENE PUTNAM,)
) PLAINTIFF,
)
vs.) TRANSCRIPT OF RECORD
)
ROBERT HENRY PURKERSON,)
) DEFENDANT.
)

June 21, 2022
Greenville, South Carolina

B E F O R E:

THE HONORABLE G.D. MORGAN, JR., JUDGE

A P P E A R A N C E S:

MICHAEL GENE PUTNAM
Pro Se Plaintiff

WESLEY JACKSON SHULL, ESQ.
Attorney for the Defendant

Transcribed by:
CHERYL A. SMITH
Circuit Court Reporter
from a WebEx Recording

INDEX

(SW) - Denotes State's Witness
(DW) - Denotes Defense Witness
(IC) - Denotes In Camera

PAGE

There were no witnesses called.

EXHIBITS

<u>NO</u>	<u>DESCRIPTION</u>	<u>ID</u>	<u>EVD</u>
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There were no exhibits introduced.

P R O C E E D I N G S

THE COURT: The next matter is Michael Putnam vs. Wake Christian Academy, et al. This is, it looks like, Defendant Purkerson's motion for summary judgment; is that correct?

MR. SHULL: Yes, sir.

How are you today, Your Honor?

THE COURT: Doing well. Doing well.

I understand the caption, most of the original defendants are all out of the lawsuit; is that correct?

MR. SHULL: Yes, sir. I believe Mr. Purkerson is the loan survivor.

THE COURT: Okay. All right.

MR. PUTNAM: I dispute that. But certainly, Wake Christian Academy and the teachers were dismissed in Federal District Court for lack of personal jurisdiction.

THE COURT: All right. It looks like -- I mean, from the file that I've seen, the only defendant left is Mr. Purkerson, but I may be wrong on that. Yes, sir. Are the other defendants still in it?

MR. SHULL: I believe it's just Mr. Purkerson. I think that Mr. Putnam may have a different interpretation of procedural law than I do, but I'm really only concerned with Mr. Purkerson.

THE COURT: All right. But we're here today just on

1 Mr. Purkerson's motion. Okay.

2 All right. This is a motion for summary judgment.
3 I'll hear from you.

4 MR. SHULL: Yes, sir. May it please the Court. I'm
5 Wes Shull. I'm here on behalf of Mr. Bob Purkerson, who's
6 an 83-year-old retired engineer.

7 To give you a little bit of background on this case
8 -- it's got a pretty long and tortured history. I'll try
9 to get through the pertinent background very quickly for
10 you, sir.

11 Mr. Putnam was previously married to Lyn Purkerson
12 Maples, who was Bob's daughter. They got divorced in
13 2009. They have one child. And Ms. Purkerson, Lyn, was
14 remarried to a man named Rob Maples, and they moved to
15 North Carolina with the child. The child was in school at
16 Wake Christian Academy at this time, and at some point in
17 2016 there was an investigation by the local authorities
18 in Wake County, North Carolina, and by the authorities in
19 Greenville, South Carolina, into Mr. Putnam in regard to
20 some statements that his daughter made to her teacher and
21 the principal and the guidance counselor in 2016.

22 This lawsuit as to all defendants essentially stems
23 from those investigations. He originally filed a lawsuit
24 against everybody but Mr. Purkerson involved in this case
25 including Wake Christian Academy, the guidance counselor

1 there, the principal, I believe Lyn Maples's family law
2 attorney at the time, Vanessa Kormylo and Rob Maples, her
3 current husband as well as several others. They all
4 moved, because they were all residents of the State of
5 North Carolina, to have it removed to Federal Court. And
6 for that reason, in August of 2019, Mr. Putnam amended his
7 complaint to include Bob, who was still a resident of
8 Greenville County, in an attempt to defeat diversity of
9 jurisdiction.

10 That thing was in the Federal Court system for a good
11 long time. It was ultimately dismissed without prejudice
12 based on the federal magistrate's recommendation to
13 Federal Judge Cain and who did find -- they both found
14 that Mr. Purkerson was only added for the purpose of
15 defeating diversity of citizenship.

16 It was dismissed without prejudice, so therefore, in
17 March of 2020, Mr. Putnam refiled a complaint here in
18 Greenville County in Common Pleas. I did not represent
19 Mr. Purkerson at that time. He was represented by another
20 attorney. I didn't become involved until, I think,
21 February of 2021.

22 There was a motion to dismiss that was held in front
23 of Judge Miller. He denied it. And we are currently
24 Number 6, I think, on the docket scheduled for trial on
25 July 25, 2022. So next month we may very well be going to

1 trial.

2 I counted it up, and either myself or the prior
3 attorney or somebody on my behalf has made 12 appearances
4 on Mr. Purkerson's behalf since this thing started the
5 second time in state court. Out of those 12 appearances,
6 one of them was a mediation. At seven of them,
7 Mr. Purkerson was not the moving party at all. And my
8 point to you there is that this thing has been going on
9 just with regard to Mr. Purkerson since 2019, and he has
10 incurred thousands of dollars of legal expenses defending
11 it.

12 We've been in front of Judge Miller twice. We've
13 been in front of Judge Sprouse on this case. We've been
14 in front of Judge Kinlaw twice, Judge Verdin twice, Judge
15 Gravely twice, Judge Maddox and now Judge Morgan.

16 I filed a motion a little bit over a year ago for
17 summary judgment just using the affidavits of witnesses
18 that Mr. Putnam had named in his complaint: Tony Traynham
19 and Sergeant Perry, who's with the Greenville County
20 Sheriff's Office. That was heard in front of Judge
21 Verdin, I think, in April, and she ended up issuing an
22 order denying my motion for summary judgment but requiring
23 that Mr. Putnam submit a list of names of potential
24 witnesses.

25 And I forgot to say I have a memorandum that I filed

1 on June 14th that I'd like to hand up for your
2 consideration, sir.

3 THE COURT: I think you filed it with the Court,
4 didn't you?

5 MR. SHULL: Yes, sir.

6 THE COURT: All right. I've read both your
7 memorandum, and I've also read -- Mr. Putnam, I believe,
8 filed in forma an affidavit or -- but I have read -- let
9 me see what it -- I read Mr. Putnam's -- Plaintiff Michael
10 Gene Putnam's affidavit affirmation in opposition to
11 Defendant Purkerson's motion for summary judgment, and I
12 also read the Defendant Robert Henry Purkerson's
13 memorandum in support of his renewed motion for summary
14 judgment. So I've read both of them.

15 MR. SHULL: Okay. Great. Thank you, sir.

16 MR. PUTNAM: Your Honor, if I could -- before he
17 submits that, Rule 56(c) specifically says that the movant
18 in a motion for summary judgment shall file no less than
19 ten days prior to the hearing whatever it is that they
20 want to supplement.

21 THE COURT: Actually, that's not what the rule says.
22 What the ten-day requirement is that you have to give
23 notice to the opposing party when you -- before a motion
24 is heard, you give -- you file the summary judgment notice
25 ten days ahead.

1 And so I'll hear from you, though, Mr. Putnam. Let
2 me let him get through his argument and then I'll hear ---

3 MR. PUTNAM: I just wanted to let you know I have not
4 been served with what he's -- in any shape, form or
5 fashion.

6 THE COURT: Okay. And I'll give you all the
7 opportunity in the world to address that.

8 So go ahead, Mr. Shull. If you would, continue on.

9 MR. SHULL: Yes, sir. We filed that memorandum and
10 all of the attachments on June 14th. And then it was
11 emailed, and I've got copies of the email from my
12 paralegal to Mr. Putnam on June 15th if you'd like to see
13 it. So he was sent a copy of the memorandum and the
14 attachments.

15 THE COURT: Okay.

16 MR. SHULL: Can I hand this to you?

17 THE COURT: Yeah. I'll take a look at that.

18 MR. SHULL: In addition to that, as you should be
19 aware, I think I had attached three new affidavits from
20 witnesses to my memorandum. And I'm sure that Mr. Putnam
21 has copies of those. The only way he should have been
22 able to get them was either from the witnesses or from my
23 memorandum because I also have some emails that the
24 witnesses forwarded to me that they consider to be
25 threatening that Mr. Putnam was sending to Jeff Fleming to

1 his workplace email threatening to send a sheriff to serve
2 him to embarrass him at his workplace and also mentions
3 somebody named Richard Adams, who's, I believe, his
4 employer, if you would care to see those emails.

5 THE COURT: Yeah. If you've got a copy, I'll take a
6 look at those.

7 MR. SHULL: Yes, sir.

8 THE COURT: And as I understand, Mr. Fleming is the
9 first husband of Ms. Maples?

10 MR. SHULL: He was at one point in time married to
11 Ms. Maples. I'm not sure what order that is. I think he
12 was married ---

13 THE COURT: Okay. And they have a child -- and as I
14 understand, they have a child named Zoie?

15 MR. SHULL: Yes, sir.

16 THE COURT: Okay.

17 MR. SHULL: So essentially, since Judge Verdin's
18 order denying my motion for summary judgment, we have what
19 I would submit to you is five new pieces of record in
20 front of you that we didn't have. One is the affidavit
21 that I had Mr. Purkerson execute that was submitted along
22 with my motion that was filed in April.

23 The second one is Mr. Putnam filed -- or served me
24 with a letter which is attached as Exhibit G to my
25 memorandum with his responses to my discovery that was

1 sent to him back, I believe, in 2020. I had to file a
2 motion to compel that in December, and we got an order
3 compelling discovery responses. That's Exhibit G.

4 On -- Exhibit I is a letter that he sent with
5 additional information.

6 And then Exhibit H is excerpts of the claimant's
7 deposition. I also had to file a motion and appear in
8 court to get an order for him to be compelled to appear at
9 his deposition.

10 I also had to file a motion and appear in court to
11 get an order for him to be compelled to appear at his
12 deposition which did take place.

13 The fourth piece of information in front of you
14 that's new is the affidavit that Mr. Putnam submitted with
15 his motion in opposition this past weekend.

16 And then the fifth piece of information are the three
17 affidavits from the three witnesses, his witnesses that he
18 had previously named: Jeff Fleming, Nikkee Fleming and
19 Zoie Fleming. And like I said, those were attached to my
20 memorandum.

21 I would like to first tackle plaintiff's affidavit
22 that he filed this past weekend, and I -- you should have
23 a copy of it because it was attached to his motion in
24 opposition.

25 You know, I would submit to you that there's very

1 little factual assertions made in this affidavit. If you
2 look at it, Number 5 says that my relationship with
3 Mr. Purkerson has been contentious since my daughter's
4 move in as much as Mr. Purkerson did communicate a
5 defamatory statement to Mr. Jeff Fleming. I would submit
6 to you that the theory that their relationship has been
7 contentious is not a factual, defamatory, negative, false
8 statement. Whether or not Jeffrey Fleming communicated
9 that Mr. Purkerson had made a defamatory statement to
10 Mr. Fleming is hearsay because it's the statement of a
11 nonparty by Mr. Putnam here. So I would admit to you that
12 it doesn't meet the requirements of Rule 56 because Rule
13 56 requires admissible evidence and I don't think that
14 Mr. Putnam's statements about what Mr. Fleming said would
15 be admissible.

16 THE COURT: And you're referring to -- is there a
17 particular paragraph number in his affidavit?

18 MR. SHULL: It's Number 5.

19 THE COURT: Number 5. Okay.

20 MR. SHULL: In Mr. Putnam's affidavit.

21 THE COURT: In Mr. Putnam's affidavit. Okay.

22 MR. SHULL: Yes, sir.

23 Not only that, but it's refuted by Mr. Fleming's
24 affidavit which says the very opposite, that he never had
25 a conversation with Mr. Purkerson. It involved

1 Mr. Purkerson discussing the investigations of DSS or the
2 authorities into Mr. Putnam or that he ever said anything
3 that was factually inaccurate, defamatory or negative.

4 Number 6 on Mr. Putnam's affidavit says that
5 Mr. Purkerson and his wife sat and told my daughter, my
6 daughter's stepsister, I believe, Z, who, I believe, as
7 you've already pointed out, is Zoie, quote, awful,
8 unquote, untrue things about me such that her step mother,
9 Nikkee Fleming, felt compelled to call me and describe how
10 upsetting the statements were, and that Zoie did not
11 believe any of the statements to be true.

12 Again, this is a statement made by a third party
13 witness by Mr. Putnam as to what they told him. It would
14 not be admissible. Secondly, it's refuted by Nikkee
15 Fleming's affidavit that I submitted with my memorandum in
16 which she said the same thing that Jeff Fleming said. She
17 was never -- never had a conversation with Bob Purkerson
18 about the investigation or she does not recall, cannot
19 testify that Mr. Purkerson ever defamed Mr. Putnam to her.
20 So I would admit to you that he doesn't meet his burden
21 under either Number 5 or Number 6 of his own affidavit.

22 Number 7 says that I have -- Mr. Putnam has personal
23 knowledge that Mr. Purkerson made personal, in-person
24 threats at his residence and also via a telephone message
25 left on my answering machine. The transcription of those

1 recordings are included in Exhibits 3 and 4 attached to
2 this affidavit. Further, a sealed copy of these
3 transcripts has been prepared for the submission to this
4 court.

5 What Mr. Purkerson has is he has a voicemail message
6 that -- what Mr. Putnam has is a voicemail message that
7 Mr. Purkerson apparently left on Mr. Putnam's mobile phone
8 in which he made admittedly threatening comments. But,
9 again, I don't think that meets the legal definition of
10 defamation, which I do have spelled out for you on page 10
11 of my memorandum. That requires a message to a third
12 party that is defamatory. One, is defamatory; two, is
13 publish with actual or implied malice; three, is false;
14 four, is published by the defendant; five, concerned the
15 plaintiff; and six, resulted in legally presumed or in
16 special damages. A communication from the defendant to
17 the plaintiff does not count as publication. It has to be
18 published to a third party.

19 In these voicemail messages -- one of them is a
20 voicemail message. One of them is apparently a recording
21 that Mr. Putnam recorded without Mr. Purkerson's knowledge
22 that took place in Mr. Purkerson's driveway. Again, not
23 defamatory statements because not published to a third
24 person.

25 Moving on -- and I think that we could probably just

1 stop right there. Under Rule 56, as the prior attorney
2 was arguing before you, we've submitted an affidavit that
3 has not been refuted by Mr. Purkerson, by Dr. Traynham and
4 by Sergeant Perry.

5 But if we keep going further and look at the evidence
6 that's developed in the past year or so, you have
7 Exhibit G, which was his letter that he sent per the order
8 of Judge Verdin. And it's a letter that he sent to me and
9 to the other attorney who at the time was representing
10 Mr. Maples, who has now been dismissed, listing
11 14 witnesses out that he believed would prove defamation
12 against Mr. Purkerson. These 14 names include
13 Mr. Purkerson's wife, Gail Purkerson, Dr. Traynham, Jeff
14 Fleming, Nikkee Fleming and Zoie Fleming.

15 Out of those five that I just listed of the 14, I
16 have affidavits from four of them denying any defamation.
17 Again, I don't think it's my burden or my job to chase
18 around every witness in the state or in the southeast that
19 Mr. Putnam comes up with, but there are four who have
20 signed affidavits. There are no affidavits or testimony
21 from any other witnesses other than Mr. Putnam in the
22 affidavit I just went over.

23 When I deposed Mr. Putnam, he eliminated eight of the
24 14 witnesses on that letter. And, again, I have 14 from
25 the other -- I have affidavits from four of the other 14

1 making only two more -- two or three more witnesses on
2 that 14 list even viable. And, again, he hasn't gotten
3 any testimony from either one of them. One of those three
4 witnesses is his own daughter.

5 Exhibit I, that was part of his ultimate response to
6 my supplemental interrogatories. He was supposed to
7 completely answer Interrogatory Number 5 and Interrogatory
8 Number 6 that were sent to him some time ago.

9 Interrogatory Number 5 said: Set forth the specific
10 contents of any and all statements you allege Purkerson
11 made concerning you. For each statement identify the date
12 of the statement, the persons to whom the statement was
13 made, and any other persons present when the statement was
14 made. If the statement was a verbal communication or if
15 the statement was a written communication, identify the
16 recipient of the statement and all persons to whom
17 Purkerson provided a copy of the statement.

18 His response to this can be found as Exhibit 2 to
19 what I have submitted as my Exhibit I. He says, "Wes,
20 there are 36 pages of text messages regarding all involved
21 including your client. I have not deposed Nikkee Fleming,
22 Jeff Fleming, Kearson Maples and Zoie Fleming. All are
23 able and willing to testify as to defamatory statements by
24 Robert Purkerson. Depending on whether we have a
25 scheduling hearing or a discovery deadline will determine

1 who and when I am able to depose."

2 Additionally, separated by a piece of colored paper
3 in Exhibit T-22 are emails from Purkerson, and, of course,
4 the one he -- where he is essentially assaulting me in his
5 driveway and then, quote, he can't wait to get his hands,
6 end quote, on me, and he is going to give it to me, quote,
7 un quote, big time. He also mentions DSS and the
8 investigation started shortly after this confrontation
9 where I just -- where I was just trying to pick up my
10 child from Purkerson's home. I'm going to email the audio
11 files because I need to change the format from a .wav file
12 to an mp file. I have much more audio that I will
13 supplement after I can get some professional assistance to
14 make them more audibly clear.

15 And then there's pages and pages and pages of text
16 message correspondences after the fact, after he has filed
17 this lawsuit between him and Nikkee Fleming, none of which
18 shows any defamatory statements made by Purkerson. None
19 of it.

20 Also included in this packet that he sent me per the
21 order of Judge Maddox is a transcription of what
22 Mr. Purkerson said to Mr. Putnam in his driveway where he
23 said he was going to give it to him big time. Again,
24 nondefamatory, not published.

25 An undated email from Bob Purkerson to Jeffrey

1 Fleming, this is one of the few pieces of evidence of a
2 statement made to a third party. I think there are two of
3 them. Let me read to you real quick what this one says.
4 I don't know why the date was redacted out, but it was.
5 "Lyn," his daughter, "just brought us up to date on your
6 contact with Michael. Wow. Michael is a sick, desperate
7 man and is manipulating you big time. What Michael is
8 doing and saying is not true. We are so thankful Zoie is
9 safe and happy with you and is getting the help she needs.
10 You're doing a fine job with her, and we thank you for it.
11 We wish we could help. Thank you, Bob." I would submit
12 to you there's not a defamatory statement in there. He
13 gave his opinion that Mr. Putnam was desperate.

14 THE COURT: What about the statement that he is sick
15 and desperate?

16 MR. SHULL: I think that's his opinion. He didn't
17 make a factual allegation that Mr. Putnam was doing A, B,
18 C, or that Mr. Putnam was a thief.

19 That's the only piece of evidence other than there's
20 another email. And this is an email from Bob directly to
21 Mr. Putnam. There are some people copied on it. I'm not
22 sure who some of the people are. One of the people is --
23 one of the persons is Lyn Purkerson. The subject is
24 "communications." And it says, "All communication with
25 Gail and me must come to me at my email address or home

1 phone. Do not continue texting and calling Gail. I am
2 your only contact starting now." Clearly, no defamatory
3 statements made in that email.

4 The next email is an email, again, from Mr. Purkerson
5 to Mr. Putnam that says -- again, the date was redacted
6 for some reason, "I understand you are lawyered up and you
7 will get lawyered up. The lawyers will try to assassinate
8 the character of each person and everybody will loose
9 [sic] and a judge will make a decision and probably get
10 DSS involved. What will happen to you and 'blank'" -- I
11 believe that was the daughter's name and I redacted it --
12 "and where does this end and when will you get out of our
13 lives?" Again, correspondence directly to the plaintiff.
14 No publication, no defamatory statement made.

15 MR. PUTNAM: You didn't leave anything out in that --
16 in the last sentence of that related to drug abuse,
17 alcohol abuse?

18 THE COURT: Hold on. I'll let you speak, Mr. Putnam.

19 MR. SHULL: I don't know what he just said, but I
20 didn't leave anything out of what I just read you.

21 THE COURT: What exhibit was that?

22 MR. SHULL: I.

23 THE COURT: Exhibit I?

24 MR. SHULL: That was actually the last page of
25 Exhibit I.

1 Well, excuse me, this is another email. This one is
2 from -- excuse me. The last page of Exhibit I is his
3 response to Interrogatory Number 6 that was also per court
4 order. It's Interrogatory Number 6 says, "State with
5 specificity what Purkerson encouraged the child to
6 exaggerate and/or the false statements Purkerson
7 encouraged the child to make. State what aspect of the
8 child's statements were exaggerated or false and the
9 manner in which the statements were exaggerated or false."

10 His response is, "Wes, since I was not present when
11 much of this occurred, I will be relying on the testimony
12 from other individuals, some of the same ones mentioned
13 above. Ms. Hinkle in Mount Pleasant will be able to
14 testify that my daughter eavesdrops on family meetings
15 where Purkerson and Lyn and Rob are behind close doors and
16 'blank' puts her ear up against the wall. My daughter has
17 called me from inside their cars while parked in the
18 driveway and asked me why bad things are said. I'm trying
19 to find the phone recording of those which I believe is in
20 my storage facility. Sometimes if a child hears the same
21 thing over and over, they will begin to believe it. Also,
22 I have been desperately trying to get the emails which I
23 will -- which I believe will unlock a vault of gold in my
24 opinion. I hope to have the audios cleaned up by the end
25 of the week. They're highly time-consuming to work with."

1 When I took Mr. Putnam's deposition, I read all that
2 stuff to him just like I have read it to you and asked him
3 if he had anything to add to it, and he denied that he
4 did. In his deposition -- and my summary of his
5 deposition starts on page 6 of my memorandum. In his
6 deposition, excerpts of which were attached, he could not
7 recall how, when or where he first found out about these
8 alleged defamatory statements that Bob made about him. He
9 stated that he had given me all of the emails and text
10 messages that he had that he thought were relevant.
11 However, the email that I just read to you from Nikkee
12 Fleming that I would submit to you is inadmissible because
13 it's hearsay, it's an email from Nikkee, is refuted by
14 Nikkee's, Zoie's and Jeff's affidavits, and, again,
15 doesn't prove defamation.

16 In his deposition, he stated that the only people who
17 had actually told him that they had heard any defamatory
18 statements made by Mr. Purkerson were Jeff, Nikkee and his
19 daughter. And again, out of those three people, I've got
20 the affidavits refuting it.

21 He admitted that he was never told anything directly
22 regarding any firsthand knowledge of defamatory statements
23 made by Larry Hoxie, Gail Purkerson, Amy Creamer, Barbara
24 Hawkins, Carol Morgan, Taylor Wilson Tucker, Robbie
25 Purkerson or Gloria Walker, Chyna Nunez, Ginger Pop --

1 Ginger Pop, I believe, is Mr. Putnam's own sister -- Diane
2 Jeter. So he eliminated 11 witnesses in his deposition
3 testimony. Out of those 11 witnesses, eight of them were
4 in the original list of witnesses ---

5 THE COURT: The ones you just mentioned had been
6 eliminated?

7 MR. SHULL: Yes. Because he admitted -- and I've got
8 the transcript attached so you can read it. He admitted
9 in his deposition that those witnesses had never told him
10 that Mr. Purkerson came up to me and said X, Y, Z bad
11 about you.

12 He can't prove any financial damages. He's been on
13 Social Security disability since long before any of these
14 supposed tortious defamation defamatory statements were
15 made. And as I just read out to you, special damages or
16 actual damages is one of the key elements to the cause of
17 action of defamation.

18 He admitted when I asked him about the audio
19 recordings that he had submitted to us, of the audio
20 recordings that he had taken of Bob, he admitted that
21 those were not defamatory. And then when I asked him why
22 he had not obtained any affidavits or any testimony from
23 any of these witnesses that he says are supposedly out
24 there, he said, "I'm fine with just turning them loose."
25 And that's a direct quote.

1 And, Your Honor, I would submit to you that what
2 we're going to have is just a bunch of turning loose of
3 witnesses if he can get them here come July. And, you
4 know, this thing has gone on for three years. He has had
5 technically since August of 2019 to present evidence
6 supporting his claim against just Mr. Purkerson. He
7 hasn't done it.

8 Moving on, you know, Rule 56 as was -- and just for
9 your notes, the exhibits from Jeff, Nikkee and Zoie are
10 Exhibits L, M and N to my memorandum.

11 I would submit to you that under Rule 56, plaintiff
12 is resting upon the mere allegations in his pleadings and
13 his response. The affidavit, the parts of it that were --
14 actually would be admissible do not set forth specific
15 facts showing a genuine issue for trial. The only
16 evidence he submitted is either inadmissible or
17 conclusory. He's had since at least March 2020 or since
18 August 2019, whichever one of those two dates you want to
19 use, to come up with this evidence. And I would submit to
20 you that he just has not met his burden. There has not
21 been any rebuttal of the facts that we put forth to you,
22 and I believe -- I believe that his theory is going to be
23 just to call whoever he can, put them on the stand, and
24 hope that they're going to say what he hopes -- that he
25 wants them to say.

1 And with that, Your Honor, I'll conclude this and
2 would ask that you grant the renewed motion for summary
3 judgment. Thank you.

4 THE COURT: Thank you. Let me ask you this. I heard
5 that name, although it was eliminated from being a witness
6 or anything, the name of Carol Morgan. Who -- Mr. Putnam,
7 who is Carol Morgan?

8 MR. PUTNAM: Probably your -- well, your father's --
9 it would be your mom.

10 THE COURT: So the Carol Morgan that Mr. Shull listed
11 is -- has been eliminated as a witness, though, correct?

12 MR. SHULL: I would submit that he eliminated her as
13 a witness in his deposition testimony when he said that
14 none of these people, and I just was going through the
15 list with him. He'd actually submitted a separate list
16 with some additional names, and he eliminated most of them
17 as well. We're essentially down to his daughter, himself
18 -- really his daughter and himself. And I think -- I
19 think all the other witnesses that he's listed, none of
20 them have provided testimony that supports this case,
21 which is obviously what he's got to have. But most of all
22 of them have either been eliminated through his testimony
23 or through affidavits I've managed to run around and get
24 from them.

25 THE COURT: All right. And, again, I just -- I want

1 to make sure I'm clear on this. The -- first of all, the
2 Carol Morgan that Mr. Shull named there -- if you would
3 stand up, please, especially with the microphone because
4 we're doing it WebEx. You don't have to lean down. It
5 will pick you up.

6 MR. PUTNAM: Okay. Am I speaking loud enough?

7 THE COURT: Yeah. You're fine. It will pick you up.

8 So my first question is the Carol Morgan that
9 Mr. Shull just mentioned, and I thought I heard you say
10 that it could be my mother.

11 MR. PUTNAM: I believe that -- I believe that's
12 correct. And I obtained that from Mr. Purkerson's wife's
13 Facebook page where she had communicated with your mom.
14 And at the time I was -- and I think I've gotten over the
15 hump now of being able to get the emails from
16 Mr. Purkerson and Mr. Maples and -- which are going to be,
17 you know, substantially conclusionary. But that certainly
18 was not intended as a slight toward you or your family.

19 THE COURT: And I'm not taking it that way. What I
20 need to make sure, though, is that she is not going to be
21 a witness in this case.

22 MR. PUTNAM: That's correct.

23 THE COURT: All right.

24 MR. SHULL: And I really don't have a stance on that.
25 I don't think that anything would affect your ability to

1 make a ---

2 THE COURT: And yeah. I don't either as long as
3 she's not going to be a witness. And Mr. Putnam is
4 informing the Court that she is not going to be a witness;
5 is that correct?

6 MR. PUTNAM: That's -- that's correct, Your Honor.
7 And I also, when this hearing was docketed to be seen
8 before you, I contacted the counsel for the defendants and
9 told them that I had worked with your dad a substantial
10 number of years that I had services, I was there 28 years,
11 and whether they had any concerns about, you know, that
12 relationship. And they did not. So ---

13 THE COURT: All right.

14 MR. SHULL: I don't remember that communication, but
15 it could have been with one of the other defense
16 attorneys.

17 THE COURT: Do you know who you had that
18 communication with?

19 MR. PUTNAM: Well ---

20 MR. SHULL: It doesn't matter.

21 THE COURT: As long as it doesn't matter. I mean, I
22 just want to make sure that both sides are fine with me
23 hearing this matter because it does not sound like my
24 mother is going to be a witness in this case. And
25 Mr. Putnam is saying he worked with my dad. But I don't

1 know Mr. Putnam, so I don't have any relationship with him
2 as well.

3 So assuming -- well, not assuming anything. Are both
4 of you fine with me going forward on this matter?

5 MR. SHULL: Yes, sir.

6 THE COURT: Okay. Mr. Putnam?

7 MR. PUTNAM: Yes, sir.

8 THE COURT: Okay. All right. Mr. Putnam, I'll hear
9 from you. Yes, sir.

10 MR. PUTNAM: Okay. Your Honor, Mr. Shull filed his
11 motion for summary judgment on, I believe, April 19th of
12 2022. And in that motion, and it's stamped April 19th, he
13 refers -- and as I asserted earlier, I have not seen what
14 someone else told me was over 160 pages of things that
15 were filed last week. I've been working on trying to file
16 my opposition as to what I knew existed.

17 In his -- in his motion that was filed April 19th, he
18 says there is no genuine issue of a material fact which
19 establishes plaintiff's alleged causes of action for
20 defamation, just period. He doesn't make a -- you know,
21 any other reference to that. It's just a statement. He
22 says plaintiff has no evidence to support his allegations
23 including no statements, affidavits or other admissible
24 evidence as required by Rule 56. I think I'll show that
25 that's not correct in just a few minutes.

1 One of the issues is that after the North Carolina
2 defendants were released from the case because I attempted
3 to use the long-arm statute to bring them to South
4 Carolina but couldn't establish sufficient number of
5 contacts for them, so on July the 24th of 2020, I filed
6 under -- pursuant to Rule 15 a motion for relief to amend
7 my complaint with the Court to not only clean up all these
8 defendants that were still appearing out there, but also
9 to modify my allegations and claims as to the parties to
10 be more in line with what the actual facts had become at
11 that time. That motion has not been heard or granted. I
12 have requested that you could grant that today, Your
13 Honor.

14 THE COURT: What did -- tell me again. What is your
15 motion that you said has not been heard?

16 MR. PUTNAM: It's a motion for leave to amend my
17 first amended complaint which was filed about four or five
18 months after the initial complaint. And then after --
19 after -- in state court, in this court, the North Carolina
20 defendants were dismissed, and so in an attempt to clean
21 up that and in an attempt, and several attempts since
22 then, there's nothing in Rule 15 that tells me I have any
23 basis for pushing the Court to make a ruling on that. I
24 do have a motion for issue preservation that I am
25 hopefully going to be able to file this week and ask again

1 for the Court to look at that issue because certainly,
2 five months into the case I don't think that the Court can
3 determine that it was futile or prejudicial in any way.
4 And I do know that was in the middle of COVID and all of
5 that.

6 But I did file my motion. I filed the first amended
7 complaint, and I filed a copy of my proposed second
8 amended complaint with a draft marked over it.

9 So ---

10 THE COURT: Let me ask you this. That motion to
11 amend the complaint, when -- because I'm not seeing it.
12 Not that it's not -- I may be overlooking it. But
13 when ---

14 MR. PUTNAM: July 24th of 2020. And it's on the
15 index.

16 THE COURT: Mr. Putnam, I'm informed by the clerk
17 that there's a note in the file that you withdrew that on
18 December 2, 2020.

19 MR. PUTNAM: No, sir. I have no -- no knowledge of
20 that. I withdrew a motion to quash about that time -- or
21 a motion to compel, actually.

22 THE COURT: So this is a motion back two years ago.

23 MR. PUTNAM: Well, my point -- my point in discussing
24 that is is that when Mr. Shull talks about the allegations
25 of the complaint, the allegations of the complaint are two

1 years old and I've not been allowed to update those
2 allegations to conform to the discovery that has occurred
3 between them. And so there's allegations and information
4 that needs to be -- needs to be updated to conform to
5 that. And everything I read in Rule 15 says, you know,
6 it's actually an abuse of discretion to deny a party a
7 leave to amend.

8 THE COURT: Well, that's not actually the case. It
9 can be an abuse of discretion, but that's just for an
10 appellate court to determine whether it is an abuse of
11 discretion because it depends on the facts of the case and
12 the procedural issues that arise surrounding a motion to
13 amend under Rule 15. So the abuse of discretion is not --
14 that's an appellate -- an appellate court standard that
15 makes a determination as to whether the trial judge did
16 abuse a discretion in his or her discretion in not
17 allowing a Rule 15 amendment.

18 So -- but going back to this motion to leave, this
19 motion to amend plaintiff's first complaint ---

20 MR. PUTNAM: First amended complaint.

21 THE COURT: Plaintiff's notice of motion and motion
22 for leave to amend plaintiff's first amended complaint.
23 And so are you telling the Court that that never was ruled
24 upon? See, we have -- as I told you, the clerk has a note
25 in the file that that was withdrawn. Are you saying that

1 that was not withdrawn?

2 MR. PUTNAM: No. I would have never withdrawn that
3 motion. In fact, I asked Judge Gravely in a hearing about
4 that. And in his order, he just simply said the -- the
5 matter was not part of the -- what was before the Court,
6 and therefore, the Court is not making an order as to that
7 issue.

8 THE COURT: Yes, sir.

9 MR. SHULL: I don't have the public record in front
10 of me, but I'm almost positive that this has already been
11 brought up and has been ruled upon in some subsequent
12 order, either one of Judge Gravely's orders or, I want to
13 say, maybe Judge Verdin's order. I can't tell you the
14 date of the order. But this is not the first time I've
15 heard this, and I think it has been dealt with. It might
16 take some digging on the public record, but I think either
17 Judge Gravely or Judge Verdin dealt with that fairly
18 recently, actually.

19 THE COURT: Okay.

20 MR. PUTNAM: Well, when I filed my motion for issue
21 preservation, because as I understand it and understanding
22 that I'm pro se so I don't know the law certainly as well
23 as Mr. Shull and certainly yourself, but my understanding
24 is the appellate court can't rule or will not address
25 anything that has not been ruled or addressed by the lower

1 court. So I want -- I've got several issues that have not
2 been addressed by the Court, and so I'm going to make this
3 filing and ask that they be addressed so that I can
4 preserve those in some fashion if it ends up that they're
5 never addressed.

6 THE COURT: What are the issues that you feel have
7 not been addressed?

8 MR. PUTNAM: Well, I think the issue related to my
9 leave to amend opens up a lot of opportunity to address
10 issues. If I'm denied on a leave to amend the complaint,
11 that's going to affect substantially what else I'm able to
12 address in there. Some of those include, Your Honor,
13 submissions by the defendants as to a complaint that had
14 already been rendered moot by an amended complaint. So
15 they ask for relief as to the original complaint, but the
16 original complaint has already been rendered moot by the
17 first amended complaint. And so they were granted relief
18 as to a complaint that was of no value or it was a
19 nonissue, as I understand it.

20 THE COURT: It looks like from the file that there
21 have been several hearings, and the issue that you are
22 raising here as far as amending the first amended
23 complaint, those possibly have either been dealt with, but
24 also there's arguments not been raised by you in previous
25 hearings, correct?

1 MR. PUTNAM: Well, in a -- in a -- in a motion that I
2 -- that I filed within the last nine months, I did make a
3 request as to evaluating or reconsidering. But there's
4 been a number of orders and a number of motions to
5 reconsider, and so standing here today, I couldn't tell
6 you which exact one of those, but I'd be glad to get back
7 to the Court. But knowing the importance of my ability to
8 be able to do that, I can assure you that I have not
9 intentionally in any way filed anything that would have
10 been to remove that previous hearing, although I may need
11 to simply re-request leave to amend.

12 THE COURT: And that's not before me here. But the
13 motion to amend the first amended complaint, what is your
14 -- what are you arguing that you want to amend to add?
15 And, again, it's not before me. This motion today is for
16 summary judgment. But you have raised this issue. What
17 is it that you are seeking to amend the first amended
18 complaint to add?

19 MR. PUTNAM: Well, Your Honor, when the -- when the
20 complaint was originally filed, okay, there was no -- I
21 was subject to -- in the fall of 2018, I was subject to a
22 sex crime investigation by Greenville County Sheriff's
23 Office. Okay. And it was determined to be unfounded.
24 And Judge Hodges in Family Court ordered that it be
25 sealed. He ordered that anybody that had copies of

1 anything, that they destroy it, bring it to him. He took
2 the guardian's file, which supposedly she was the only one
3 that had it. He said we were going to take a 15 minute
4 recess and I'm going to have my paralegal shred everything
5 that's in here including tapes, CD's of -- because my poor
6 daughter had to go through a four-hour forensic interview.
7 And none of those things have been -- and Mr. Purkerson
8 and Mr. Maples both got unredacted copies somehow of the
9 investigation report which is not even subject to the
10 Freedom of Information Act.

11 And this whole thing with Mr. Perry, Sergeant Perry,
12 Mr. Purkerson's daughter told the guardian that she got it
13 from Sergeant Perry. Captain Price at the sheriff's
14 office, which, of course, directed to the sheriff, I met
15 with him. He said he talked to Sergeant Perry, and
16 Sergeant Perry denies that he gave her a copy of the
17 report. I asked him, well, did he give it to anybody
18 else? And he said, well, this is -- you didn't ask me
19 that. This is the end of the conversation, and so forth
20 and so on.

21 I met with a Gene Donohue at the solicitor's office.
22 Went through and showed him a copy of the report and so
23 forth. Also a note from the lady at the LEC that's over
24 the Freedom of Information stuff saying I can't -- I can't
25 even give Mr. Putnam a copy of this report. It's supposed

1 to be sealed down in Columbia somewhere.

2 I requested -- I subpoenaed Sergeant Perry to appear
3 at a Family Court hearing because I wanted him to testify
4 about this issue, and he no-showed. And Judge Tiffany
5 sent a deputy to his office over at county square and said
6 if he's in his office, bring his fanny, you know, over
7 here. But he called in sick that day. So we've not
8 gotten that resolved.

9 But I'm just saying that's ---

10 THE COURT: Let me ask you this, though. What is the
11 -- what is this motion that you say you filed back -- it
12 appears it was filed at some point a couple years ago or
13 back in 2020, I guess, what -- as far as the issues that
14 we are here today about this, is there anything that is
15 your -- are you intending to add anything? Or what are
16 you intending to add in the first or to the first amended
17 complaint that would have any relevance to this hearing
18 today?

19 MR. PUTNAM: That is -- that is a -- that is a great
20 question. Because Mr. Purkerson and Mr. Maples have
21 disseminated that report. Okay. I've got -- and I was --
22 I'm going to try -- the motion to seal was a little more
23 complicated than I thought, but I've got -- I've got a
24 copy of the reports. Mr. Purkerson provided an unredacted
25 copy in his production of documents and interrogatories as

1 well as Mr. Maples. And then Mr. Maples filed it ---

2 MR. SHULL: That's not true.

3 MR. PUTNAM: Mr. Maples filed it, put it on the
4 Public Index.

5 THE COURT: Mr. Putnam, what, though -- what are you
6 intending to add to the complaint that has any relevance
7 to the issues before us today?

8 MR. PUTNAM: Your Honor, here is a package from Chase
9 Law, who Chase Campbell was representing both defendants
10 at one time. And this filing November 13, 2020, contains
11 the unredacted copy of the sex crime investigation if
12 you'd like to look at it.

13 THE COURT: You show it to Mr. Shull.

14 MR. PUTNAM: And that is as to Mr. Purkerson.

15 MR. SHULL: First of all, this is a discovery
16 response that was never put on the Public Index. Chase
17 Campbell represented Mr. Maples and Mr. Purkerson before I
18 was involved.

19 Secondly, what he's talking about, Mr. -- first of
20 all, I don't know what any of this has to do with my
21 motion for summary judgment. But one of the complaints
22 that he filed, I can't remember which amended complaint it
23 was, he attached a copy of an investigative report from
24 the sheriff's office from DSS. And that's probably how we
25 got a copy of it. And if you look on the Public Index,

1 he's attached -- I know for a fact Greenville County
2 Sheriff's Office is something that he -- he attached to
3 the Public Index and attached it to his complaint. But I
4 don't know what any of this ---

5 MR. PUTNAM: Totally redacted, Your Honor.

6 THE COURT: But what -- Mr. Putnam, what do any of
7 these issues have to do with the motion for summary
8 judgment as to defamation before me today?

9 MR. PUTNAM: Because according to -- according to
10 Mr. Donahue and also the chief legal counsel for DSS out
11 at Holland Road now, it's a criminal offense to
12 disseminate an unfounded report fully disclosing the names
13 of my child, her dates of birth, her Social Security
14 numbers. Mr. Shull put my driver's license, two years of
15 tax returns, a DSS report with my daughter's name on it on
16 the Public Index December the 22nd, and it was out there
17 for 45 days. And he wouldn't voluntarily remove it. And
18 I had to get -- file a motion before Judge Maddox, and
19 Judge Maddox told him to remove it.

20 MR. SHULL: This was all argued ad nauseam in front
21 of Judge Maddox.

22 THE COURT: And he's already ruled on that.

23 MR. SHULL: He's already ruled on it.

24 I filed a motion to compel, and when I did, I
25 attached his interrogatory responses in my motion --

1 again, this has all been argued in front of Judge Maddox
2 and has nothing to do with the issue before you today. I
3 put in the motion attached is the discovery responses from
4 plaintiff without the exhibits. And my intent was for the
5 exhibits that he had sent to not be added to the Public
6 Index, and they accidentally were. I've apologized for
7 that. I didn't know about it until we were standing right
8 here in one of these courtrooms and he brought it up in
9 front of Judge Maddox or I would have. And that's been
10 taken off the public record.

11 But none of that has anything to do with whether or
12 not Mr. Purkerson in 2017 or 2018 was running around
13 defaming Mr. Putnam. And, again, that's been ruled on by
14 Judge Maddox.

15 MR. PUTNAM: Okay. Your Honor, that's a -- that's a
16 professional liability issue that, you know, is not part
17 of this.

18 THE COURT: But that issue has been -- Judge Maddox
19 has heard that matter and has issued an order.

20 What -- I want to hear what evidence do you have in
21 opposition to their motion for summary judgment that you
22 were defamed by Mr. Purkerson.

23 MR. PUTNAM: May I disseminate?

24 THE COURT: Yes.

25 MR. PUTNAM: Your Honor, this is a -- this is an

1 email from Mr. Purkerson to me. And I've redacted my
2 daughter's name in several places. But in his last
3 sentence he says, "Think about your alcohol abuse, your
4 drug abuse, your financial abuse, your debt, your verbal
5 abuse and unemployment." I believe some or all of those
6 could be determined by a jury as defamatory.

7 THE COURT: Let me -- let me bring this to your
8 attention is that in a defamation case, the defamatory
9 statement has to be published to a third party. The
10 defamatory statements have to be -- and those third
11 parties would be someone other than you. So a statement
12 made by someone to you is not legally defamatory because
13 there's no publication to a third party. So this email
14 that you have handed up -- for the record, it's dated July
15 the 12th, 2020 at 8:13 and 32 seconds a.m. And it says
16 from bpurkerson@hotmail.com to mputnam21@aol.com. And so
17 the language, any statements in that email under the law
18 are not considered defamation because it's not published
19 to a third party.

20 MR. PUTNAM: And, Your Honor, I understand that,
21 which is why in a motion -- or not a motion, but in
22 subpoenas to Google and Microsoft to get access to their
23 email accounts, because I don't know who's copied or blind
24 carbon copied on this information. Judge Hocker gave
25 Ms. Jones at Chase Law a nice lecture and rejected the

1 motion to quash. And in working with Judge Verdin, we
2 finally have a -- and counsel for both defendants agreed
3 to the use of a third party to extract that information.
4 And, you know, a note from Judge Verdin's law clerk, she
5 asked me to reword my -- reword my motion to comply. We
6 had a conference call with Google and her law clerk
7 straightening out the issues related to that.

8 But I would submit that we haven't had a -- we
9 haven't had a scheduling order. Discovery's still
10 pending. I've got three depositions I intend to take in
11 July. I had one scheduled for June 1st, but the
12 transcriptionist in Summerville where that was going to
13 take place called me. And her child was very sick and in
14 the hospital, and so she canceled and I didn't have
15 contacts down there for two days' notice to get it
16 rescheduled.

17 THE COURT: Let me -- again, I want to be sure the
18 record is clear. So the copy of the email that you handed
19 up to the Court, and it's the one I just referenced for
20 the record, this would not be evidence of defamation
21 because there is no publication to a third party. Do you
22 have any evidence in opposition to the motion for summary
23 judgment that creates any issue of fact and proves your
24 allegations of defamation against Mr. Purkerson in this
25 case?

1 MR. PUTNAM: Your Honor, you have a sealed transcript
2 up there, perhaps.

3 MR. SHULL: And I don't have any of that stuff that's
4 been sealed and submitted.

5 THE COURT: And that included your transcripts of
6 phone calls; is that correct, Mr. Putnam?

7 MR. PUTNAM: Like the voicemail that Mr. Purkerson
8 left ---

9 THE COURT: Yes.

10 MR. PUTNAM: --- which there clearly is somebody in
11 the background, a third party? I would like to play that
12 for you.

13 The transcript was part of my filing, so, Mr. Shull,
14 you should have a copy of that.

15 MR. SHULL: I don't know what I have a -- I just see
16 where you have Exhibit 5 and Exhibit 6.

17 MR. PUTNAM: Exhibit 5 and Exhibit 6 ---

18 MR. SHULL: This hasn't been sealed.

19 MR. PUTNAM: --- is unrelated. This is like
20 Exhibit 3.

21 MR. SHULL: I would be remiss if I didn't point to
22 you that all this stuff about Judge Hocker, he filed a
23 motion to compel some time ago, and we appeared in front
24 of Judge Gravely on his motion to compel. And
25 essentially, I think his motion to compel was a request to

1 force Mr. Purkerson and Mr. Maples, who was still in the
2 case at the time, to sign something giving some third
3 party the right to access their Google email accounts.
4 And we argued -- we argued about this in front of Judge
5 Gravely, and he denied the motion. So, again, we're just
6 rehashing stuff that for three years we've all -- we've
7 been in front of seven or eight judges over all this
8 stuff, Your Honor.

9 THE COURT: Mr. Putnam, what I need, again, is
10 evidence today that you have that would support your
11 allegation.

12 (WHEREUPON, an audio recording was played in open court.)

13 MR. PUTNAM: Your Honor, I would submit -- I would
14 submit that under state law regarding the first element,
15 if there is any dispute regarding the truth of the
16 defamatory statement, it is a question for the jury to
17 determine and summary judgment should be denied. And I
18 believe that recording is defamatory, and it was in front
19 of a third party. And where it went from there, I don't
20 know.

21 But summary judgment is such a drastic measure. I've
22 had -- I admit that things have gone slow with COVID and
23 everything else. I've also had three ankle surgeries that
24 prevented me from driving for a total of 62 weeks and now
25 I have a total ankle replacement, a brand-new ankle. But

1 I've tried to navigate this as best I can.

2 The affidavits that Mr. Shull has from Zoie Fleming,
3 Jeff Fleming and Nikkee Fleming are totally contrary to
4 their communications, and we'll straighten that out when
5 we ---

6 THE COURT: Well, here's the thing about it,
7 Mr. Putnam, is that that is testimony. That's sworn
8 testimony that the Court can consider. And so that's why
9 I'm asking you, again, what is the evidence? I assume you
10 are arguing that this phone call -- this voicemail is
11 evidence. What other evidence other than that do you have
12 in opposition to the summary judgment motion?

13 MR. PUTNAM: Ms. Fleming stated ---

14 THE COURT: Is there testimony from Ms. Fleming?

15 MR. PUTNAM: I was going to get that testimony
16 June 1st. I've only had three days' notice. I have not
17 even received the package. And I ---

18 THE COURT: I believe Ms. Fleming -- I believe
19 Ms. Fleming has testified via her affidavit, though,
20 hasn't she?

21 MR. PUTNAM: I haven't -- I haven't seen that. It
22 hasn't been served on me.

23 I don't -- I haven't seen where a pro se party is
24 required to go onto the Public Index eight times a day to
25 see what's been filed. He has no -- his affidavit of

1 service for that stuff dated the middle of last week says
2 Mr. Putnam is going to be served by traditional means
3 because he's not part of the electronic filing system, and
4 it has yet to show up. I always -- you know, he could
5 have had -- he could have had a process server serve that
6 to me.

7 THE COURT: Just for the record, Mr. Shull, were the
8 affidavits -- these affidavits that you submitted in
9 support of your motion, were they served on Mr. Putnam?

10 MR. SHULL: They were emailed to him, which I believe
11 was adequate electrical [sic] service at the time. The
12 affidavits I attached to my motion, which he still has to
13 rebut, were submitted to him. And he clearly had these
14 affidavits. He's clearly read my memorandum because he's
15 harassing the witnesses who signed the affidavits at their
16 work, and now he's going to put in his motion in
17 opposition. He's going to stand here and tell the Court
18 he hasn't even read something that he knows I filed on the
19 Public Index a week ago. And I would submit to you that
20 that's just not logically ---

21 MR. PUTNAM: Your Honor, I have not read his
22 memorandum, and I have not harassed Jeff Fleming. Jeff
23 Fleming, in less than a month ago, told me we're all ready
24 to testify. We're -- we're all in line. Pearson Maples
25 says I can't wait for Mr. Putnam to subpoena my ass,

1 quote, unquote, because I've got -- I've saved everything.
2 I've got tons of stuff.

3 THE COURT: Again, I want to get back to my question
4 again is what evidence today do you have in opposition to
5 the defendant's motion for summary judgment? What
6 evidence do you have in opposition to that motion as we
7 sit here today?

8 MR. PUTNAM: Okay. Well, Your Honor, the only -- the
9 only affidavit that I have from Mr. Purkerson, which is my
10 exhibit -- I'm getting a little scrambled here. Do you
11 have the affidavit of April 18th?

12 THE COURT: Affidavit of who?

13 MR. PUTNAM: Bob Purkerson.

14 MR. SHULL: It's attached to both my motion and it's
15 attached to his motion in opposition.

16 THE COURT: All right. Again, Mr. Putnam, what is
17 the evidence that you have today in opposition to the
18 defendant's summary judgment motion?

19 MR. PUTNAM: Mr. Purkerson's affidavit says it's not
20 based on just personal knowledge. It's based on
21 information and belief. I have read in the last week at
22 least 25 cases in South Carolina including up to the
23 Supreme Court saying information and belief is not an
24 acceptable form of representing an assertion pursuant to a
25 motion for summary judgment. It has to be based on

1 personal knowledge. And so his assertion that it's based
2 on information and belief is a -- I think a fatal flaw in
3 his affidavit, and it should not even be considered by the
4 Court. And in Mr. Shull's motion of April 19th, he says
5 the memorandum of law is attached to this filing. Well,
6 there was nothing attached.

7 So it's been 63 days. Nobody can find a motion -- a
8 memorandum of law in support that I have a reasonable
9 opportunity to oppose and rebut, and then all of a sudden
10 he drops 162 pages bomb, you know, four days from the
11 hearing that the Court, I guess, is saying, you know, have
12 you been able to go through those 162 pages and rebut
13 everything in there? No. You've got a fatal affidavit,
14 you've got a memoranda, a motion saying that there's a
15 supporting memorandum of law, and there is not one. You
16 can't find one on the Public Index, and he -- and I've
17 asked him to email me that memoranda, and he's not sent
18 that to me, have you?

19 THE COURT: Again ---

20 MR. SHULL: (Indiscernible.)

21 MR. PUTNAM: You emailed me an April 19th memorandum.

22 THE COURT: Let's just address -- Mr. Putnam, needs
23 to be addressed -- everything needs to be addressed up
24 here.

25 MR. PUTNAM: I'm sorry.

1 He says -- he just said he emailed me an April 19th
2 memoranda.

3 MR. SHULL: Can I respond, Your Honor?

4 THE COURT: Yes, sir.

5 MR. SHULL: The memorandum was emailed to my
6 paralegal, Taylor Griffiths, who we all know each other
7 well by now, trust me, on June 15th. She also emailed him
8 later that day the affidavit of Zoie Fleming that we
9 uploaded to the Public Index on June 15th. And he's
10 admitted to me in an email that he got the mail with
11 Zoie's affidavit.

12 There have been probably about a thousand emails back
13 and forth between everybody on this thing. He got that
14 email. It was sent to him. He knows about the
15 memorandum. I think he just tried to say that I didn't
16 upload a memorandum to the Public Index. All of us
17 sitting in here knows that's false.

18 THE COURT: I'm looking at it right now.

19 MR. PUTNAM: April 19th?

20 THE COURT: Mr. Putnam, a memorandum is actually not
21 even required. It's not required in state court. It's
22 only prepared by lawyers who want the Court -- to have
23 arguments before the Court. And so in Federal Court it
24 is, in state court it is not.

25 But a memorandum has been filed. It was filed on the

1 index on June the 14th. So it has -- it has been filed.
2 And you -- I have heard you say a couple times or several
3 times a day that you've looked at the Public Index and
4 made references to, well, that was or was not on the
5 Public Index. So it sounds like you have actually been
6 looking at the Public Index.

7 MR. PUTNAM: Well, Your Honor, I can show you an
8 email two or three days ago where I ask him to send me --
9 because in his April 19th filing, he says the memorandum
10 of law is attached.

11 THE COURT: Okay.

12 MR. PUTNAM: So I've been looking for it. So ---

13 THE COURT: Here, again, I want to get back -- I want
14 to know what evidence do you have to present to the Court
15 today in opposition to the defendant's summary judgment
16 motion?

17 MR. PUTNAM: I believe that Mr. Purkerson's
18 affidavit, based on information and belief, is fatal to
19 his affidavit.

20 THE COURT: But even if -- even if that were the
21 case, even if -- and I'm not saying that is the case, but
22 even if that were the case, there are other affidavits
23 that have been filed in the case, and there's other
24 testimony. But the burden -- once the motion for summary
25 judgment is filed, the burden then shifts to you to oppose

1 the motion for summary judgment. You're not allowed to
2 just rely on your arguments or the complaint. You have to
3 come forward with admissible evidence as to what evidence
4 of defamation do you have to present to the Court against
5 or in opposition to the defendant's summary judgment
6 motion.

7 MR. PUTNAM: Well, I'm assuming that the Court has
8 concluded that his message to me where there's people in
9 the background did not contain defamatory statements. If
10 that's the Court's determination ---

11 THE COURT: I have not concluded anything. I'm
12 simply asking what evidence do you have so I can make a
13 decision.

14 MR. PUTNAM: But I -- you know, I would rest on the
15 fact that that was a defamatory communication in the
16 presence of others, and pending Judge Verdin doing her
17 in-camera review of the emails, I think I should be given
18 that opportunity for discovery.

19 And it's been, you know, very difficult dealing with
20 Google and Microsoft and their corporate legal
21 departments. They raise tons of objections. We finally
22 overcame those. And I think I should be given the
23 opportunity, and the law provides for the Court to provide
24 me an opportunity to obtain additional information to
25 provide subsequent affidavits. And I would respectfully

1 request to the Court, whether it's 60 days or whatever the
2 number is, things -- I don't know how long Judge Verdin
3 will take to do her in-camera review, but we've come this
4 far. And if there are -- I've even dropped the request
5 that I get copies of incoming emails. I've modified the
6 request to say that it's only as to outgoing emails.

7 THE COURT: All right. Mr. Shull, what about the
8 issue that Mr. Putnam raises about the phone call?

9 MR. SHULL: The one that he just played?

10 THE COURT: The one that he just played.

11 MR. SHULL: A phone call from Bob to Michael that
12 was, I believe, left -- I think it was a message that he
13 left on his mobile device that I think I alluded to early
14 on in this thing, that, again, was a direct communication
15 from the defendant to the plaintiff. I don't think
16 there's any evidence of any publication of a voicemail.
17 I've left some nasty voicemails on people's mobile phones,
18 unfortunately.

19 THE COURT: What about his argument that there was a
20 third person there in the room that ---

21 MR. SHULL: Well, then I think it's his burden to go
22 figure out who that person was and get testimony. I don't
23 -- it sounded to me like maybe it was a TV in the
24 background.

25 But I will tell you this. The elements of the cause

1 of action of defamation require publication, and it
2 specifically says "is published with actual or implied
3 malice; three, is false." I'm not sure that anything that
4 he said in there can be proven as being false. Most of it
5 was his opinion about how mad he was. "Three, is
6 published by the defendant." So eavesdropping, you'll see
7 in the -- in the evidence that I've submitted, a lot of
8 his theory is is that somebody's going to put their ear to
9 the door and listening to people's private conversations,
10 and that somehow or other constitutes defamation?

11 So number one, if somebody overheard a voicemail
12 message that Bob left on Mr. Putnam's mobile device, I
13 don't think -- A, I don't think there's any evidence that
14 it was published, and B, if somebody was eavesdropping on
15 the message, then that's not publication by the defendant,
16 which is what the elements require.

17 Now, I do want to just very briefly tell you also
18 that the affidavit that Bob signed says it is based upon
19 personal knowledge or information and belief. In the case
20 Dawkins that he cites in his motion in opposition, here's
21 the affidavit that was withheld says "and that the facts
22 are true of his knowledge except those matters and things
23 therein alleged upon information and belief as to those he
24 believes them to be true." That affidavit was upheld in
25 the very case that he cites.

1 So the fact that Purkerson's affidavit is based upon
2 personal knowledge or information and belief doesn't make
3 it somehow faulty. What he's testifying to there is
4 personal information. "I did not have anything to do with
5 the report by my granddaughter made to her teachers or her
6 principal or anyone else at Wake Christian Academy."
7 That's personal knowledge to him, and it says it's based
8 on that. "I have not made any false statements about
9 Michael G. Putnam or made statements concerning any sex
10 crime investigation to anyone." His argument that the
11 affidavit -- that's just not a good argument.

12 THE COURT: All right.

13 MR. PUTNAM: Which, Your Honor, that's -- that's one
14 of the things that I think is additionally fatal about his
15 affidavit is he says I've never made any false statements
16 about Mr. Putnam. He doesn't assert that he's never made
17 any defamatory statements about me.

18 MR. SHULL: They have to be false by definition, I
19 believe.

20 MR. PUTNAM: In Parrish vs. Allison, 376 whatever,
21 2007 Court of Appeals, (indiscernible) claim of defamation
22 or false or defamatory statement was made, colon --
23 semi-colon, it says regarding the first element of
24 defamation, if there is any dispute regarding the truth of
25 the defamatory statement, it is a question for the jury to

1 determine, Ware vs. Citicorp and so forth and so on.

2 THE COURT: All right. I've heard your arguments,
3 and I have read the material, and I will reread everything
4 else. And I will take it under advisement, and I will let
5 you know of my decision.

6 ***** END OF TRANSCRIPT OF RECORD *****
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1 CERTIFICATE OF REPORTER

2
3 STATE OF SOUTH CAROLINA)4 COUNTY OF GREENVILLE)
5
6

7 I, CHERYL A. SMITH, Official Court Reporter for the
8 Thirteenth Judicial Circuit of the State of South
9 Carolina, do hereby certify that the foregoing is a true,
10 accurate and complete Transcript of Record, to the best of
11 my ability based on the audio provided, of the digitally
12 recorded proceedings had from WebEx, and evidence
13 introduced in the trial of the captioned case, relative to
14 appeal, in the Court of Common Pleas for Greenville
15 County, South Carolina, on the 21st day of June, 2021.

16 I do further certify that I am neither of kin,
17 counsel, nor interest to any party hereto.
18

19 September 30, 2022
20

21
22 Cheryl A. Smith

23 Cheryl A. Smith, CVR-M

24 Court Reporter
25

IN THE COURT OF COMMON PLEAS
FOR THE STATE OF SOUTH CAROLINA
GREENVILLE COUNTY

DEPOSITION OF MICHAEL G. PUTNAM

MICHAEL GENE PUTNAM,

Plaintiff,

vs.

CASE NO. 2020-CP-23-01450

WAKE CHRISTIAN ACADEMY, DANA GRAVES CORDELL,
KELLIE O'NEAL AUERWECK, ROBIN CARY MAPLES,
VANESSA HARTMAN KORMYLO, P.A., ROBERT HENRY
PURKERSON,

Defendants.

DEPONENT: MICHAEL G. PUTNAM

DATE: APRIL 12, 2022

TIME: 10:22 AM

LOCATION: WILLSON JONES CARTER & BAXLEY
GREENVILLE, SOUTH CAROLINA

REPORTED BY: VALERIE G. MELKUS, RPR
NCRA REGISTERED PROFESSIONAL
REPORTER
AdvancedOne Legal

ORIGINAL

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF:

MICHAEL G. PUTNAM,
Appearing Pro Se

ON BEHALF OF ROBERT HENRY PURKERSON:

WILLSON JONES CARTER & BAXLEY
BY: WESLEY J. SHULL
325 Rocky Slope Road
Suite 201
Greenville, SC 29607

ALSO PRESENT: Robert Purkerson

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MICHAEL G. PUTNAM

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1 MICHAEL G. PUTNAM,
2 having been first duly sworn, was examined and
3 testified as follows:

4 EXAMINATION

5 BY MR. SHULL:

6 Q. All right. Mr. Putnam, as you know, I'm
7 Wes Shull. You and I know each other by now in
8 this thing, and I'm going to take your deposition
9 today. Have you ever had your deposition taken
10 before?

11 A. Yes.

12 Q. What was that in regard to?

13 A. Well, the company I worked with, IH
14 Services for 28 years, I was --

15 Q. That's IS?

16 A. IH Services.

17 Q. Sorry.

18 A. I was the executive vice president chief
19 financial officer, so I was also responsible for
20 all of our legal affairs. And we had 4200 people
21 in 21 states, so there was always some litigation
22 going on somewhere. So I probably have given 30
23 or 40 depositions.

24 Q. And that was in regards to what kind of
25 cases?

1 A. Workers' comp or employee practices.

2 Q. Employment lawsuits?

3 A. Yeah. Wrongful termination,
4 discrimination.

5 Q. All right. Well, then, you should know
6 the drill. This nice lady here is the court
7 reporter. She takes down everything we say. She
8 types it out word for word in a Q and A form like
9 you're reading a play, and she puts it in
10 something called a transcript. And I tell
11 everybody that I depose that if we have a
12 trial -- or I guess maybe I should say when we
13 have a trial, I'll have a copy of the transcript
14 and I can use it at the trial. All right, sir?

15 A. Yeah. And I'd like to have a copy to
16 review.

17 Q. Sure. Because she says -- types down
18 everything word for word, you got to say yes or
19 no and answer audibly, verbally because when she
20 types up uh-huh, it looks a whole lot like
21 huh-uh! Okay? So I'll remind you of that as we
22 go along today.

23 If you want to take a break, be happy to
24 let you do that get, get more water or something
25 else to drink or use the bathroom. You just

1 can't discuss your testimony while we're on break
2 since we've started this thing up. And that's
3 pretty much it. Do you have any questions of me
4 before we get going?

5 A. No. Being pro se, if I object to the
6 question, I'll still answer the question, but
7 you'll note the objection. Okay?

8 Q. Well, this is a discovery deposition, so
9 you can object to the form.

10 A. (Nodded.)

11 Q. Not that I'm giving you legal advice,
12 but in a discovery deposition, it's a different
13 set of objections, different set of rules. So
14 you do have the right to a lawyer. You know
15 about that, right?

16 A. Yes.

17 Q. And you're choosing to go today without
18 an attorney?

19 A. Right.

20 Q. All right. Is there any reason why you
21 would not be able to understand the questions
22 that I ask you today?

23 A. No. But if I don't understand the
24 question, I'll ask you to rephrase it, please.

25 Q. Sure. And I'll be happy to repeat it.



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1 Just let me know. Okay?

2 A. (Nodded.)

3 Q. You have to --

4 A. Yes, sir.

5 Q. Thank you. You don't have to say sir.

6 You just have to say yes or no. And when I say
7 any reason why you couldn't understand my
8 questions, is there any kind of medication that
9 you're on or anything that would prohibit you
10 from understanding what I'm asking?

11 A. No.

12 Q. Any type of mental health or physical
13 health conditions that would cause you to not
14 understand my questions?

15 A. No, sir.

16 Q. All right. You were about 17 or
17 18 minutes late. And why was that?

18 A. I was -- I received a phone call from my
19 sister who is in hospice, and I -- she only
20 feels -- certain times of day where she feels
21 like she can talk, and so she called me. And I
22 didn't want to lose the signal, so I pulled over
23 to have a brief conversation with her.

24 Q. All right. What is your date of birth?

25 A. January 11, 1956.

1 Q. That makes you how old?

2 A. I'm 66.

3 Q. All right. What is your address, where
4 do you reside?

5 A. 1108 South Main Street, Unit 355, and
6 that's Greenville 29601.

7 Q. How long have you been there, sir?

8 A. Approximately three years.

9 Q. You ever been in the military?

10 A. No, sir.

11 Q. Are you on any medications?

12 A. Yes, sir.

13 Q. All right. If you could give me those.

14 A. Well, I take a medication called
15 irbesartan, which is for blood pressure. I take
16 a medication called metoprolol, which is --

17 Q. That's for blood pressure?

18 A. It controls the rhythm of the heart. I
19 take a medicine called Paxil, P-a-x-i-l, which is
20 a -- kind of an anxiety antidepressive medicine.
21 I take a half a dose once a day. I take Crestor
22 for cholesterol. I take prescription fish oil.
23 It's called Vascepa, which is to lower you
24 triglycerides. I take a baby aspirin, vitamin D,
25 a multivitamin, calcium. I take a medicine

1 called Praluent.

2 Q. Do you know how to spell that?

3 A. P-r-a-l-u-e-n-t. That's a cholesterol
4 medicine as well. And I take Xanax, X-a-n-a-x,
5 as needed, and that's for anxiety.

6 Q. How often do you take the Xanax?

7 A. Well, as I said, I take it as needed.
8 So I might not take it a day, I might take it the
9 next day.

10 Q. How many of those do you take a week,
11 would you say?

12 A. It might depend on the week. If you and
13 I are in court, I might take an extra one.

14 Q. On an average week --

15 A. But maybe 12.

16 Q. About 12 per week in an average week?

17 A. Well, I don't count them, so that's my
18 best estimation.

19 Q. What's the script for, what milligram of
20 the Xanax?

21 A. .5.

22 Q. So when you say 12, you're talking about
23 12 .5-milligram pills?

24 A. Correct.

25 Q. Any other prescription medications?

1 A. I take a medicine called VESicare, which
2 I don't know the milligrams. That's prescribed
3 by my urologist to allow me to sleep through the
4 night without having to get up and go to the
5 men's room.

6 Q. That's for prostate or incontinence
7 or --

8 A. No. It relaxes your -- as I understand
9 it -- I'm not a doctor. As I understand it, it
10 relaxes your bladder to allow it to hold more
11 urine so that you can get through the night. But
12 you can google that if you want a more detailed
13 description.

14 Q. What's your urologist who prescribes
15 that?

16 A. It was David Rice. And he recently
17 retired, so I don't believe I've gotten a new
18 script since he retired. But I will have to
19 select somebody else in the group.

20 Q. Which group is it?

21 A. It's Palmetto Greenville Urology.

22 Q. All right. Any other prescription
23 medication, sir?

24 A. Not that I can think of.

25 Q. All right. Who prescribes the

1 hypertension medication?

2 A. Dr. Trey Chandler.

3 Q. And where is he?

4 A. He's part of Prisma Health.

5 Q. Is he your primary care provider?

6 A. No.

7 Q. What kind of doctor is Dr. Chandler?

8 A. Cardiologist.

9 Q. Does Dr. Chandler prescribe any of these
10 other medications that we talked about?

11 A. He prescribes the irbesartan, the blood
12 pressure, he prescribes the Praluent. He
13 prescribes --

14 Q. Which one is that, sir?

15 A. Praluent. You asked me to spell it for
16 you a moment ago.

17 Q. Okay. Praluent?

18 A. Praluent, P-r-a-l-u-e-n-t.

19 Q. Any of the other medications prescribed
20 by Dr. Chandler?

21 A. Did I mention the metoprolol?

22 Q. Yep. He prescribes that too?

23 A. Yes, sir.

24 Q. Anything else that's prescribed by Dr.
25 Chandler?

1 A. Well, the baby aspirin, but it's not a
2 script. Oh, and I also take Xarelto,
3 X-a-r-e-t-l-o, 20-milligram. That's prescribed
4 by Dr. Chandler.

5 Q. What's that for, sir?

6 A. That is a blood thinner to reduce the
7 risk of throwing a clot.

8 Q. Anything else that we've talked about
9 that's prescribed by Dr. Chandler? I've got he
10 prescribes the hypertension medication, the
11 metoprolol, the Praluent, however you pronounce
12 it, and the baby aspirin. Anything else?

13 A. Not that I recall.

14 Q. All right. Who prescribes the Paxil?

15 A. Dr. Jeffrey Smith.

16 Q. What kind of doctor is he?

17 A. He's a psychiatrist.

18 Q. Does Dr. Smith prescribe any other
19 medication?

20 A. The Xanax and the Paxil.

21 Q. All right. So that leaves us with the
22 Crestor. Who prescribes the Crestor?

23 A. Dr. Chandler.

24 Q. The vitamin D is over-the-counter?

25 A. Excuse me?



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1 Q. The vitamin D is over-the-counter?

2 A. Yes, sir.

3 Q. And you said the VESicare is prescribed
4 by Dr. Rice, who is your urologist, or was your
5 urologist?

6 A. Right.

7 Q. Okay. Any other prescription
8 medications?

9 A. Not that I recall. That's enough.

10 Q. How long have you treated with Dr.
11 Smith, your psychiatrist?

12 A. 20 years.

13 Q. How long have you been prescribed the
14 Xanax?

15 A. 10 years.

16 Q. How long have you been prescribed the
17 Paxil?

18 A. That's an approximate time.

19 Q. How long have you been prescribed the
20 Paxil?

21 A. Five years.

22 Q. All right. Where did you live before
23 you were at 1108 South Main Street?

24 A. I lived at 263 Reedy View Drive. And
25 that's Greenville 29601.

1 Q. Did you own that property at Reedy View
2 Drive?

3 A. No, sir. That was an apartment complex.

4 Q. Do you own where you currently reside at
5 South Main Street?

6 A. No, sir.

7 Q. You rent it?

8 A. I do.

9 Q. How much is the rent?

10 A. 18 -- I just renewed. 1840 a month.

11 Q. 1,840 a month, dollars; is that right?

12 A. Yes. And there are some utility charges
13 and stuff that vary.

14 Q. How much are they normally?

15 A. My power bill runs normally, say, around
16 \$65 a month. I don't have a water bill, and my
17 cable and Internet are included in my lease
18 price.

19 Q. All right. Where were you born?

20 A. Greenville, South Carolina.

21 Q. And have you lived here your whole life?

22 A. No, sir.

23 Q. Where all have you lived, sir?

24 A. I've lived in Mount Pleasant, South
25 Carolina. I lived in New York City. I lived in

1 Montpellier, France, and I lived at Clemson when
2 I was in college.

3 Q. What did you do in Mount Pleasant?

4 A. Executive vice president and chief
5 financial officer for a medical products company.

6 Q. How long was that, sir?

7 A. Approximately eight years.

8 Q. And how long were you in New York?

9 A. Two years.

10 Q. And you were working there somewhere?

11 A. Yes.

12 Q. Where did you work?

13 A. I worked for a firm here in Greenville
14 called KPMG, which is a certified public
15 accounting firm, and they sent me on a rotational
16 assignment to New York in what they call the
17 professional practice group.

18 Q. Okay. What year did you graduate
19 college?

20 A. 1978.

21 Q. Let me back up. Where did you go to
22 high school?

23 A. Wade Hampton High School in Greenville.

24 Q. And you graduated there when?

25 A. 1974.

1 Q. And then you went immediately to
2 Clemson?

3 A. Yes, sir.

4 Q. All right. And I think you just said
5 you graduated in '78 from Clemson?

6 A. I graduated with my bachelor's degree in
7 1978. But you had to have 150 hours in order to
8 sit for the CPA exam, so I had been doing some
9 extra studies that weren't directed toward a
10 specific degree to get the 150 hours to qualify.

11 Q. What was the degree?

12 A. I had a Bachelor of Science in
13 accounting.

14 Q. And then you took extra classes at
15 Clemson to get to 150?

16 A. At Clemson, at Furman. Or they called
17 it a Clemson at Furman program, actually.

18 Q. When did you take the CPA exam?

19 A. Well, I'll try to say this in a way you
20 can understand. In 1977 when I was in the fall
21 of my senior year, I was able to take the CPA
22 exam, but you would not be awarded your -- if you
23 were fortunate enough to pass it, you had to wait
24 until you had your 150 hours in order to get your
25 certificate.

1 Q. You passed it?

2 A. Yes, sir.

3 Q. So you received your CPA, your
4 certificate when?

5 A. In combination with that, you have to
6 have two years of experience working for another
7 CPA, kind of like a residency in medicine or
8 something, before you actually get your license
9 to sign financial statements and tax returns.

10 Q. Okay. So when was that?

11 A. Well, around 1980.

12 Q. All right. Any other education or
13 training?

14 A. I did a six-month program at Harvard
15 University in -- it was called legal risk
16 management, and that was paid for by my company
17 that I was working for.

18 Q. When was that?

19 A. That was probably 1988 or so.

20 Q. Who was the company?

21 A. Support Systems International.

22 Q. And they were located where?

23 A. Charleston.

24 Q. Any other education, training,
25 certificates?

1 A. Mr. Shull, you have to get 40 hours a
2 year of continuing education to maintain your
3 certificate, so each year I would go to different
4 conferences or go to the -- Columbia or someplace
5 where the South Carolina Association of CPAs or
6 the American Institute of CPAs were having
7 training in order to get my 40 hours.

8 So it was no specific curriculum. It
9 was -- as in the case of attorneys, I'm sure, you
10 pick and choose what you have an interest in.

11 Q. All right. Any other education that you
12 can think of?

13 A. No, sir.

14 Q. Now, let me get a little more background
15 from you. Where are you currently working?

16 A. I'm not working.

17 Q. Why?

18 A. In 2018, I fell off a ladder in
19 preparation to sell my home and shattered my
20 ankle, right ankle. And after two different
21 surgeries, my surgeon completed a disability
22 application and I was -- he deemed me as being
23 under total disability.

24 Q. What sources of income do you currently
25 have?

1 A. I have social security disability
2 benefits.

3 Q. How much are they?

4 A. Before or after deduction for medical
5 premiums?

6 Q. What's the gross?

7 A. Around \$3,200.

8 Q. And that's a monthly amount?

9 A. Yes, sir.

10 Q. How long have you received that \$3,200
11 per month?

12 A. Since 2018.

13 Q. All right. Any other sources of income?

14 A. I have a private disability policy with
15 Prudential that will terminate next year, and
16 that pays \$4,000 a month.

17 Q. Why will it terminate?

18 A. That's just the way the policy was
19 written when I bought it in 1991.

20 Q. How long have you been receiving the
21 \$4,000 a month?

22 A. Since 2018.

23 Q. Do you remember when in 2018?

24 A. I don't.

25 Q. Any other sources of income?

1 A. No, sir.

2 Q. Do you have any rental property or
3 anything like that?

4 A. No, sir.

5 Q. Do you own any property at all?

6 A. No, sir.

7 Q. No real estate?

8 A. No, sir.

9 Q. I think if you're 66 you're eligible for
10 social security retirement?

11 A. No, sir, I'm not currently eligible for
12 social security retirement. My -- normal age of
13 retirement is 67 years and 5 months.

14 Q. So the end of the year or so?

15 A. I could be wrong about the five months,
16 whether it's four months, three months,
17 five months, six months, but it's age 67 plus
18 something.

19 Q. All right. Now, you've brought a
20 lawsuit against Mr. Purkerson and some other
21 people, correct?

22 A. Yes, sir.

23 Q. Any other lawsuits?

24 A. Ever?

25 Q. Sure.

1 A. I filed a wrongful termination lawsuit
2 against my employer in Charleston.

3 Q. Who was that?

4 A. Support Systems International.

5 Q. That was filed in Charleston County?

6 A. Yes, sir.

7 Q. When was that, sir?

8 A. Approximately 1988, 1989.

9 Q. How did that conclude?

10 A. With a negotiated settlement.

11 Q. How much did you settle it for?

12 A. I don't recall. It was significantly
13 less than six figures.

14 Q. So less than 100,000?

15 A. Yes, sir.

16 Q. Who was your attorney?

17 A. Susan Rosen.

18 Q. Any other lawsuits?

19 A. I currently have a lawsuit against
20 Prisma Health related to my ankle. It's a
21 medical malpractice action.

22 Q. All right. What happened to your ankle?
23 It's your left ankle?

24 A. Right.

25 Q. Your right ankle?

1 A. Yes, sir. Well, I fell off a ladder and
2 shattered it. That's the best way I can describe
3 it.

4 Q. And that was, I think you said, 2018 --

5 A. Yes, sir.

6 Q. -- that you fell off the ladder?

7 A. Yes, sir.

8 Q. When did you file the lawsuit?

9 A. 2020.

10 Q. And you filed the lawsuit against
11 Prisma?

12 A. It names individual doctors, University
13 Medical Group and Prisma.

14 Q. Do you remember the name of the doctors?

15 A. Stephanie Bailey, James Kyle [sic]
16 Cassas, John D. Adams, Brian Alexander Weatherby,
17 and Prisma as a corporation or --

18 Q. Okay. Are you appearing pro se
19 unrepresented or do you have a lawyer?

20 A. I have an attorney.

21 Q. Who is that?

22 A. His name is Daryl Hawkins.

23 Q. And what's the status of that lawsuit?

24 A. It's in the discovery phase.

25 Q. Has your deposition been taken in that

1 lawsuit?

2 A. Yes, sir.

3 Q. Who was the attorney representing the
4 defendants or -- is it the same attorney?

5 A. The same attorney that's representing me
6 is representing the defendants?

7 Q. No. There's more than one defendant in
8 that case, right?

9 A. They're all employees or under the
10 direction of Prisma Health.

11 Q. Was there only one attorney who took
12 your deposition in that lawsuit?

13 A. Yeah. His name is Kenneth Shaw with the
14 Haynsworth law firm.

15 Q. All right. Any other lawsuits?

16 A. Not other than the one related to the
17 case in point.

18 Q. So we've got three lawsuits. This one
19 that we're here about today, right, the one
20 against your former employer in the '80s for
21 wrongful termination and then the other current
22 one for the med mal for your right ankle,
23 correct?

24 A. Well, two active and one not active.

25 Q. Right. That adds up to three, right?

1 A. Yes, sir.

2 Q. Any magistrate court lawsuits that
3 you've brought?

4 A. I brought a magistrates small claims
5 lawsuit against Best Buy in 2020 for violation of
6 a warranty.

7 Q. What's the status of that lawsuit?

8 A. It was settled.

9 Q. For how much?

10 A. Whatever the cost of the replacement TV
11 was. They just replaced it. I didn't get a
12 check from them. They just brought a new TV and
13 hung it on the wall.

14 Q. Okay. Any other lawsuits?

15 A. Well, I was a defendant in family court.

16 Q. All right. But any other lawsuits where
17 you were the plaintiff other than the four we've
18 talked about?

19 A. Well, I was the plaintiff in a rule to
20 show cause action related to the family court --

21 Q. Anything else?

22 A. -- but I believe I labeled that as
23 petitioner.

24 Q. Okay. Any other lawsuits that you
25 brought, that you were the moving party?

1 A. Not that I recall.

2 Q. Any -- and you said you were the
3 defendant in a lawsuit? Is that what you said,
4 sir?

5 A. Brought by Mr. Purkerson's daughter.

6 Q. That's in family court?

7 A. Yes, sir.

8 Q. Any other lawsuits for which you're a
9 defendant or have been a defendant?

10 A. Not that I recall.

11 Q. All right. Do you have any relatives
12 who live in Greenville County?

13 A. I have Lisa Harris.

14 Q. What relation is she, sir?

15 A. A sister. Grover, G-r-o-v-e-r, Putnam.
16 But he's near the Greer-Spartanburg line, so I
17 technically don't know if he's a citizen of
18 Greenville County or Spartanburg County. It's
19 close.

20 Q. Okay. What's his relation to you?

21 A. He's my brother. That would be all for
22 Greenville.

23 Q. Okay. Let me get your work background
24 from you. I know you graduated from college in
25 '78. Were you a CPA most of your career or in

1 the field?

2 A. Yes.

3 Q. And where did you work coming out of
4 college?

5 A. At the time, it was called Peat Marwick
6 Mitchell & Company, and then we merged with an
7 international firm and we became known as KPMG.

8 Q. That was an accounting firm?

9 A. Yes, sir.

10 Q. How long did you work there, sir?

11 A. Seven years, approximately.

12 Q. And do you remember where you worked
13 after that, sir?

14 A. I went to work for Support Systems
15 International in Charleston.

16 Q. And how long was that?

17 A. Six or seven years.

18 Q. And you were terminated from that
19 employment?

20 A. We sold the business to a company called
21 Hillenbrand Industries out of Batesville,
22 Indiana, and all the executives were offered
23 severance packages.

24 Q. How much was the severance package?

25 A. I'm going to say it was one year.



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1 Q. One year salary?

2 A. One year salary. Continuation of health
3 benefits. But that was the subject of the
4 lawsuit I discussed earlier that Susan Rosen
5 handled. There was a disagreement about what the
6 terms of my employment agreement were.

7 Q. All right. Do you remember where you
8 worked after that?

9 A. I moved back to Greenville and went to
10 work for a company called IH Services.

11 Q. What year was that?

12 A. 1992, 1993, something.

13 Q. And what did they hire you to do?

14 A. I was the chief financial officer of the
15 company.

16 Q. How long did you hold that position,
17 sir?

18 A. I'd say about 27 years.

19 Q. When did you -- when did that employment
20 end?

21 A. In 2015.

22 Q. And why did that employment end?

23 A. The owner of the business passed away in
24 2014, and new management was brought in in an
25 attempt to change the face of the business.

1 Q. Any other employment since '78?

2 A. Not that I recall.

3 Q. Any terminations from those employers
4 that we've talked about, terminations for cause?

5 A. No terminations for cause.

6 Q. None?

7 A. No, sir.

8 Q. All right. I know you were married at
9 one point in time to Lyn. Any other marriages?

10 A. I was married to a lady named Janice
11 Easler, E-a-s-l-e-r, and we were married for
12 seven years, I believe.

13 Q. Do you remember when you divorced her?

14 A. Well, it would have been around 1985.

15 Q. Do you owe her any kind of financial
16 obligations out of that divorce like alimony or
17 any kind of support payments?

18 A. No, sir.

19 Q. Why did you-all divorce?

20 A. Her father was in -- lived in Greenville
21 and was in poor health, and I was traveling a
22 substantial amount. And we just decided our
23 priorities had changed, and we did a one-year
24 separation and she moved back to Greenville to be
25 closer to her dad.

1 Q. Do you know where she is now?

2 A. No, sir.

3 Q. Any other marriages?

4 A. No, sir, besides Lyn Purkerson Maples.

5 Q. Any children other than that one?

6 A. No.

7 Q. All right. Tell me -- did I ask you,
8 who is your primary care provider?

9 A. Oh, Robert Broker, B-r-o-k-e-r.

10 Q. Where is he, sir?

11 A. Simpsonville, South Carolina.

12 Q. Do you know the name of his practice?

13 A. Hillcrest Family Practice, which is
14 owned by Prisma.

15 Q. How long has he been your primary care
16 provider?

17 A. 15 years approximately.

18 Q. Are you treating with any medical
19 providers or professionals currently other than
20 Dr. Chandler, Dr. Smith, Dr. Broker, Dr. Rice?

21 A. Well, I'm not treating with Dr. Rice
22 since he's retired, but --

23 Q. Or a urologist?

24 A. I have not been assigned to a new
25 urologist in the group, so whenever it comes up

1 for my once-a-year thing, I'm sure I'll call and
2 get an appointment with somebody. My surgeon in
3 Charlotte who did my surgeries, his name is Dr.
4 Hodges Davis.

5 Q. And who is he with?

6 A. He's with OrthoCarolina Foot & Ankle.

7 Q. All right. Any type of ongoing health
8 condition or illness? I know you have some high
9 cholesterol and some hypertension. Anything else
10 like that?

11 A. Well, I don't actually have high
12 cholesterol now that I'm on my regimen of
13 medicine, and so it's mostly prophylactic in
14 nature to keep things in a normal range.

15 Q. What do you mean by prophylactic?

16 A. Preventative.

17 Q. Did you injure any body part other than
18 your right ankle in the 2018 fall?

19 A. No.

20 Q. Have you ever treated with a
21 neurologist?

22 A. Yes.

23 Q. When was that?

24 A. The first neurologist I treated with was
25 a Dr. Kent Kistler, and I believe the name of his

1 group was just Neurologist Associates [sic].

2 Q. In Greenville?

3 A. Yes, sir.

4 Q. Any other neurologists?

5 A. I treated with a Dr. Robert Ringel who
6 has been retired for three or four years, I
7 think.

8 Q. Anybody else, any other neurologists?

9 A. I saw a Dr. John Absher when he was in
10 private practice on his own, at his own office.
11 I don't know who his affiliation is now.

12 Q. When was the last time that you treated
13 with a neurologist?

14 A. Whenever Dr. Ringel retired was my last
15 visit, so I'm going to say 2017, '18.

16 Q. What were these neurologists treating
17 you for? Why were you treating with
18 neurologists?

19 A. Dr. Kistler was treating me for muscle
20 twitches.

21 Q. Which muscles?

22 A. Everywhere.

23 Q. Your entire body was twitching?

24 A. Well, I presented with symptoms that
25 would be similar to someone who was in the early



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1 stages of ALS or Lou Gehrig's disease, but it was
2 determined to be -- I'm trying to think of the
3 word -- random, not associated with any general
4 medical issue.

5 Q. Did any of these doctors make an actual
6 diagnosis of anything?

7 A. Well, I had a minor stroke in 2014.

8 Q. Where did you treat for that, sir?

9 A. Dr. Ringel diagnosed that. I didn't
10 know I'd had it. That was caused by my AFib.

11 Q. Any other strokes other than the minor
12 one in 2014?

13 A. No, sir.

14 Q. Have you ever been diagnosed with
15 Alzheimer's or dementia?

16 A. At this rule to show cause trial that
17 finished two weeks ago yesterday, there was
18 testimony by Dr. Selman Watson, PhD, who, in one
19 part of his report, said based on the scoring of
20 my test and so forth and so on that I was above
21 average, and later in the report said he saw some
22 signs associated with age, normal -- a mild --
23 I'm not sure -- Ms. Maples has a copy that was
24 illegally obtained of the report, so you could
25 refer to her for what exactly it says.

1 Q. All right. So the question was have you
2 ever been diagnosed with Alzheimer's or dementia.

3 A. Well, I was -- I forgot how exactly Dr.
4 Ringel worded it, but it was a -- my stroke was
5 in the -- what they call the executive function
6 part of the brain in the front parietal left
7 lobe. And it affects your ability to work with
8 numbers and complex calculations and so forth,
9 and so he diagnosed an impairment based on that.

10 Q. So did Dr. Ringel diagnose you with
11 early onset dementia or Alzheimer's or dementia
12 or Alzheimer's at all?

13 A. He used those words, but then after
14 seeing him for however many years and repeating
15 all the neurocognitive testing, decided it wasn't
16 that, to my recollection. I've not been treated
17 or seen for anything related to that since then,
18 and those words have not come with a -- for the
19 stroke, -- for the stroke, he said that my
20 cardiologist could manage that with the blood
21 thinners and stuff, so --

22 Q. What about Dr. Kistler or Dr. Absher,
23 did they ever make a diagnosis of Alzheimer's or
24 dementia?

25 A. No.

1 Q. What was their diagnosis, do you know?

2 A. It was actually called benign
3 fasciculations. That's f-a-s-c-i-l-a-t-i-o-n-s
4 [sic], which is just another word for twitching.

5 Q. And you talked just a second ago about
6 neurocognitive testing. What neurocognitive
7 testing have you had?

8 A. Well, with Dr. Watson in his office in
9 Columbia, I did a four-hour test of puzzles and
10 different things, and you're timed on it. I
11 don't -- I never obtained any of the thousand
12 questions, you know, thousand things they run by
13 you, so I never saw the results of that.

14 Q. Okay. Have you ever been evaluated or
15 treated with a psychologist other than Dr.
16 Watson?

17 A. Well, Dr. Watson didn't treat me. He
18 did an evaluation.

19 Q. Right. So my question is have you ever
20 been treated or evaluated by a psychologist other
21 than Dr. Watson?

22 A. A Dr. Diehl. Myself and Ms. Maples had
23 evaluations by Dr. Diehl, and I don't remember
24 what his first name is. He's in Spartanburg.

25 Q. Do you know how to spell it?

1 A. It's D-i-e-h-l. I think he's German.

2 Q. Any other treatment or evaluations by
3 any other psychologists?

4 A. Social Security in their evaluation sent
5 me to a person that I think was a psychologist,
6 and it was just a two-hour -- like a two-hour
7 visit. But that was one of about eight different
8 doctors that they send you to. They don't even
9 have shingles outside. Some of them are just in
10 office buildings kind of like this, so --

11 Q. Do you remember that psychologist's
12 name?

13 A. I don't. I do not.

14 Q. That psychologist was in Greenville?

15 A. Yes, uh-huh.

16 Q. All right. When did you apply for
17 social security disability?

18 A. Either 2017 or '18.

19 Q. Did you have an attorney or did you do
20 that by yourself?

21 A. I did that by myself.

22 Q. You had to fill out an application?

23 A. Yes, sir.

24 Q. And you completed that by yourself?

25 A. Yes, sir.

1 Q. Were you accepted to SSD?

2 A. Yes, sir.

3 Q. When was that?

4 A. 2017 or '18. I'm not -- took longer
5 than I wanted.

6 Q. Did they tell you when your date of
7 disability began, when you were accepted?

8 A. Yeah. They -- I believe the date of
9 disability was -- I'm not sure how they came up
10 with it -- was March of 2015.

11 Q. And so you got a lump sum when they
12 backdated it?

13 A. That's right.

14 Q. How much was the lump sum?

15 A. \$40,000 maybe.

16 Q. When you applied for social security
17 disability, what was the basis for the
18 application?

19 A. That I'd had a stroke.

20 Q. Did you have to get some doctors to fill
21 out some forms for you?

22 A. Well, I don't -- I filled out a lot of
23 forms for them and then went and saw a lot of,
24 like I said, different docs. So like I said, I
25 was doing it myself. So I'm not sure if they --

1 I signed releases for all my medical records, but
2 I never saw a -- I never saw any of the reports
3 from the doctors or what they said or what they
4 didn't say. That's all internal with Social
5 Security.

6 Q. When you completed the application for
7 social security disability, did you use
8 Alzheimer's or dementia as one of the reasons
9 that you were disabled?

10 A. I don't know if I used that word or not.
11 I know I used that I had problems with crunching
12 numbers and complex calculations, and again, they
13 got the records from the doctor, so --

14 Q. Okay. What diagnosis did you use when
15 you applied for SSD?

16 A. I may have said possible dementia,
17 possible Alzheimer's. I don't know if there is
18 now; there wasn't then definitive tests, like a
19 blood test or --

20 Q. Okay. And let me just get clarification
21 from you. You possibly put dementia and
22 Alzheimer's or you think you put possible
23 dementia and possible Alzheimer's on the
24 application?

25 A. Well, I don't even know that I have a

1 copy of the application. But I would have used
2 whatever -- however my neurologist phrased it to
3 be consistent. But it was -- again, in the early
4 stages of those things, the effects of a stroke
5 can mimic, you know, other neurological issues.

6 Q. Okay. Do you have a copy of the social
7 security disability application that you
8 completed?

9 A. I don't believe so. But I've gotten rid
10 of the -- as you downsize from a 4100-square foot
11 house to an 1100-square foot apartment, you get
12 rid of a lot of stuff.

13 Q. The last place that you worked was IH
14 Services?

15 A. Like in a full-time?

16 Q. When did your employment with IH
17 Services end?

18 A. 2015.

19 Q. And that's the last time you worked for
20 them?

21 A. Correct.

22 Q. Have you worked anywhere since then?

23 A. Well, the reason I didn't apply for
24 disability at that time was because I thought I
25 was doing well enough to be able to get back into

1 the financial field. And I did some temporary
2 assignments for a company called Robert Half
3 where I was just filling in for a controller or a
4 CFO.

5 Q. How do you spell Robert -- what was the
6 last time?

7 A. Half.

8 Q. Like H-a-l-f?

9 A. Yes, uh-huh.

10 Q. Where are they located?

11 A. All over the world.

12 Q. Were you working out of a particular
13 branch?

14 A. Well, my assignment came of the
15 Greenville office.

16 Q. And where did they assign you?

17 A. It was a company called The Patriot
18 Group in Powdersville.

19 Q. What do they do?

20 A. They're out of business now, so what
21 they did do was produce electrical cabinets for
22 like textile industry.

23 Q. When did you work at The Patriot Group?

24 A. Well, I was only there a month to help
25 get the books closed, but I don't recall the

1 exact year. It might have been 2016-2017. I'm
2 not sure.

3 Q. Have you earned any income from any
4 other source since IH Services?

5 A. Just some part-time pay from Robert Half
6 for a month.

7 Q. And did they assign you anywhere else?

8 A. No.

9 Q. So the only source of income that you
10 earned since your employment at IH Services ended
11 was at The Patriot Group through Robert Half?

12 A. Well, I had a severance agreement with
13 IH Services, and I believe that was one year.

14 Q. One year salary, sir?

15 A. Yeah. That would be the -- that would
16 be my recollection.

17 Q. All right. Did you notify the Social
18 Security Administration when you received the
19 disability award that you had some income that
20 you earned after 2015?

21 A. Well, I didn't apply for social security
22 disability until after I had already worked, and
23 that was issued on like a 1099.

24 Q. Right. I just mean -- I think you said
25 that they backdated your date of disability to

1 2015 and you got an approximate \$40,000 lump sum.
2 Did they account for the income that you had
3 earned since 2015?

4 A. I don't -- I don't recall.

5 Q. Okay. You provided me with some tax
6 returns, and I appreciate that.

7 A. Yeah. So does the rest of the world,
8 and I don't appreciate that.

9 Q. This says that in 2014 you earned
10 \$256,000.64 in wages. And I'm assuming that was
11 from IH Services?

12 A. Well, we had a holding company called
13 Synergy Services, S-y-n-e-r-g-y, and IH Services
14 was one of our operating companies under that
15 holding company. So although my actual work was
16 focused around IH Services, I was paid out of the
17 holding company so that a management fee could be
18 applied to it. So my W-2 was Synergy Services.

19 Q. Okay. And then in 2015, it says,
20 283,781. And that was also from Synergy?

21 A. Yes.

22 Q. And you stopped working there in 2015,
23 right?

24 A. Correct.

25 Q. So does -- that amount, 283,781, is that

1 for just a partial year?

2 A. Well, it includes some actual work time
3 and severance pay.

4 Q. So that includes the severance pay?

5 A. Yes, sir.

6 Q. Here is your 2016, and this says that
7 your wages were 127 -- 127,899. Where did that
8 income -- where did -- those wages, where did you
9 earn those?

10 MR. PUTNAM: I'm going to object on
11 relevance.

12 A. But that may have been a continuation of
13 some severance, which for one year would have
14 floated into 2016.

15 Q. Any other source of income during 2016?

16 A. I'd have to look at those.

17 Q. Do you mind?

18 A. Well, I mean, I don't know if the W-2s
19 are attached or not. I mean, because all that is
20 consolidated into one line item, wages and
21 salaries.

22 Q. This has your 2016 W-2, and it says,
23 Synergy for 125,928.

24 A. And how close is that to --

25 Q. It's close. So you believe that you

1 were still on their payroll because of the --

2 A. Severance.

3 Q. -- severance. So they had agreed to pay
4 you severance, but it wasn't a lump sum; you just
5 stayed on their payroll for an approximate year?

6 A. Yes, I guess that's right.

7 Q. Okay. Do you remember when those
8 payments that you were receiving from Synergy
9 ended in 2016?

10 A. I don't specifically.

11 Q. Do you have any idea?

12 A. I wouldn't want to name a month. Six
13 years ago. The months run together, you know.

14 Q. Okay. Here's your 2017 income tax
15 return, and this says that you earned \$12,957.
16 Now, do you remember where you earned that?

17 A. In 2017?

18 Q. Yes, sir. Here it is. [Tendered].

19 A. Well, I don't see a W-2 for 2017
20 attached, so -- so no.

21 Q. Well, do you remember where you worked
22 in 2017?

23 A. No.

24 Q. Do you have to claim your long-term
25 disability payments from Prudential as income?

1 A. No. Taxable income?

2 Q. Right.

3 A. No.

4 Q. So that \$12,000 wouldn't have come from
5 the disability?

6 A. No. It could have come -- well, that
7 would be a different line item, I guess.

8 Q. Did you work for anybody privately?

9 A. Well, I told you I worked for Robert
10 Half for either 2016 or 2017, so I don't know if
11 that possibly could be associated with that.

12 Q. Okay. And any reason why your work at
13 Robert Half stopped?

14 A. Well, they hired a full-time, long-term
15 controller, CFO, whatever.

16 Q. Okay. Did you want that job as the --

17 A. No.

18 Q. -- permanent CEO of that company?

19 A. No.

20 Q. Why is that? CFO. I'm sorry.

21 A. Well, I knew going in that they were
22 looking for a full-time, long-term CFO, so I
23 never really contemplated that it would be, you
24 know, an extended situation.

25 Q. A question I ask everybody. Any kind of

1 criminal record?

2 A. No.

3 Q. No convictions in the last 10 years?

4 A. No, sir.

5 Q. Have you taken any trips or vacations
6 recently?

7 A. Recently?

8 Q. In the last -- well, since 2016?

9 A. Well, I've gone to see my sister who
10 lives at Pawleys Island and -- but I've not been
11 on an airplane since I broke my ankle, so I
12 haven't gone too far.

13 Q. Okay. The lawsuit for your ankle, what
14 are you seeking as damages?

15 A. Dollar amount?

16 Q. Not necessarily. What are you -- how
17 are you claiming the damage?

18 A. It's a malpractice action related to a
19 misdiagnosis of my ankle fracture.

20 Q. Are you claiming pain and suffering?

21 A. I'd have to ask my attorney who filed
22 the complaint. I know that -- you know, that's
23 not something I've researched, what --

24 Q. Well, with respect to that lawsuit
25 against Prisma for your right ankle, are you

1 claiming lost wages?

2 A. No, sir.

3 Q. Are you claiming any kind of emotional
4 injury?

5 A. I don't know. You can look up the case
6 index. It's 2020-01690.

7 Q. You don't know if you're claiming any
8 lost wages?

9 A. I know I'm not claiming any lost wages.
10 I answered that question.

11 Q. Do you know if you're claiming any
12 emotional injury?

13 A. I don't. I don't know if that's grouped
14 in with a bunch of -- list of possible torts or
15 not. I don't know. That's a very specialized --
16 med mal is a different animal.

17 Q. Well, are you claiming any other type of
18 damage due to the med mal action?

19 A. I don't understand what you're asking.

20 Q. Well, you brought a lawsuit against
21 those defendants, correct?

22 A. Correct.

23 Q. And so the damages that you sustained or
24 that you're claiming that you sustained, I'm just
25 trying to get a handle on that.

1 A. Well, they diagnosed it as an ankle
2 sprain. And I don't want to assert what's
3 written in the complaint, but it was based on a
4 misdiagnosis. That's --

5 Q. All right. So the case that we're here
6 talking about today is a defamation lawsuit,
7 correct, this lawsuit you filed against Mr.
8 Purkerson, correct?

9 A. (Nodded.)

10 Q. You need to say yes, please.

11 A. Yes.

12 Q. Thank you. When do you allege that the
13 defamatory statements were made?

14 A. Well, I'd have to look at the complaint,
15 but it's been continuing.

16 Q. When did the statements start?

17 A. Well, some other people may have to
18 testify to that. It started earlier than I first
19 thought, but

20 Q. When were you first made aware of the
21 defamatory statements made by Mr. Purkerson?

22 A. 2018. That's my best recollection.

23 Q. So what damages are you alleging that
24 you sustained due to Mr. Purkerson's alleged
25 defamatory statements made about you?

1 A. Reputational damage. Damage to the
2 relationship with my daughter. Allegations of
3 being a sex criminal, sex crime criminal. A
4 person having no morals and accusations of an act
5 of moral turpitude.

6 Q. Are you alleging that you sustained any
7 kind of financial damage due to the alleged
8 defamatory statements made by Bob Purkerson?

9 A. As in an inability to work?

10 Q. (Nodded.)

11 A. Is that your question?

12 Q. That could be one. Any financial
13 damage.

14 A. Well, there's -- although I'm pro se,
15 this case has taken -- is expensive any way you
16 do it. And I don't have an attorney because I
17 can't afford one. But I -- I'd have to reread --
18 I'd have to reread the literature on damages that
19 I researched before filing the complaint, what
20 could be asserted and what couldn't be asserted.
21 Again, I'm not an attorney, so --

22 Q. All right. So I asked you if you were
23 alleging any financial damage because of the
24 alleged defamatory statements made about you by
25 Mr. Purkerson, and I believe you just said that

1 there were some expenses associated with the
2 lawsuit you brought?

3 A. There are expenses associated with the
4 lawsuit. If I -- because of the dissemination of
5 the lies and assertions that have been spread
6 through the community, which is my hometown,
7 would eliminate any possibility of a -- earning
8 an income.

9 But -- and I believe there are something
10 called special damages, but I'm not going to sit
11 here and try to explain that to an attorney when
12 I'm not an attorney.

13 Q. All right. What are the expenses
14 associated with the lawsuit that you've
15 sustained?

16 A. Well, direct expenses would be the
17 office supplies, paper, travel, filing expenses
18 with the court, process servers, request of
19 transcripts. Those are things that come to mind.

20 Q. Maybe some filing fees?

21 A. Mr. Shull, I think you know that on the
22 cover sheet of everything I file, there's a
23 filing fee shown on the cover sheet of the
24 filing. So I believe you -- I've not pled to the
25 Court that I'm indigent enough to have a filing

1 fee waived.

2 Q. Okay. Those damages associated with the
3 lawsuit itself, do you have any idea what that
4 equates to?

5 A. I don't. I have the information. I've
6 not added it up.

7 Q. Do you have a ballpark?

8 A. No, sir.

9 Q. And I believe you just testified that
10 you found out about the alleged defamatory
11 statements made by Bob Purkerson sometime in
12 2018?

13 A. That's my recollection. I would have to
14 look at the history of text messages or phone
15 calls from others to validate that precisely.

16 Q. Well, have you not provided me with the
17 text messages and the phone calls?

18 A. Well, I don't -- I haven't -- I've given
19 you what I have that would have been on my
20 computer or on a recording, but I certainly have
21 been informed of things, and I've also -- I've
22 given you everything that I have to the best of
23 my knowledge. But a significant amount of the
24 affirmation of the poisonous mix will come from
25 the testimony of others.

1 Q. So I asked you if you could recall when
2 in 2018 you first found out about the allegedly
3 defamatory statements, and you said you would
4 have to look at text messages and phone calls.

5 A. Well --

6 Q. Is there something in what you have
7 provided me that would help you come up with that
8 answer?

9 A. Probably not. Not precisely.

10 Q. All right. Can you give me an estimate
11 as to when in 2018 you first found out about the
12 alleged defamatory statements?

13 A. Well, understand that it was July
14 the 26th that I fell off the ladder, and so until
15 I got over the acute phase of my injury, I
16 wasn't -- again, I was still a defendant in a
17 family court case which took a significant amount
18 of time, and so I'm not going to try to sort out
19 the two different matters without going back
20 through whatever information I have or can find.
21 But I've provided you what I believe I have.

22 I will say that I had another computer
23 at that time that was -- I guess they used to
24 call them -- not laptops, but more like just a
25 box that's in my storage, and I've not -- it's in

1 an old Windows-based system that's no longer
2 supported. I'm going to need to find some
3 technical assistance to see if there's anything
4 additional in there.

5 Q. What would be on there?

6 A. Possibly e-mails, text messages.

7 Q. You would have text messages on your
8 computer?

9 A. Well, if someone sends you a screenshot
10 of something and attaches it to an e-mail, that's
11 a text message as far as I'm concerned, even
12 though it didn't come to my phone. You may have
13 a different assertion or way to describe that.
14 But if I -- someone sends me a picture of the
15 text message from their phone, I call it a text
16 message. I don't know what you call it.

17 Q. Can you tell me if you first found out
18 about the alleged defamatory statements that Mr.
19 Purkerson made about you before or after you fell
20 off the ladder on July 26, 2018?

21 A. Well, I -- you've listened to and seen a
22 copy of the transcript of his assault in his
23 driveway.

24 Q. I'm not asking about an assault. I'm
25 asking about defamatory statements.



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1 A. Well, he's making defamatory
2 statements -- there were defamatory statements
3 made that -- the recorder simply wasn't on, so --

4 Q. He made defamatory statements about you
5 to you?

6 A. And in the presence of my child and
7 maybe the presence of the police. I don't --
8 certainly his wife.

9 Q. All right. When do you claim that Bob's
10 defamatory statements about you were made?

11 A. Well, it's been continuous since
12 probably 2015 or 2016. But I didn't have
13 knowledge of them, and because they've been
14 continuous -- you know, you seem to be -- wanted
15 me to take a timeline and take a slice out of it.
16 When the defamatory information is continuous and
17 you think the snake is only this long but the
18 snake runs all the way out the window on the
19 other side and you don't find that out until
20 later, it's hard to sit here in this conference
21 room table and discern that.

22 Q. Can you tell me when Mr. Purkerson first
23 made a defamatory statement about you?

24 A. No.

25 Q. Can you tell me when the first



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1 defamatory statement that he made about you that
2 you know of occurred?

3 A. I don't have a precise recollection of
4 that.

5 Q. And you first found out about them in
6 2018, correct?

7 A. I'm not going to say that that's the
8 first time that I was aware of the defamatory
9 statement. When you're --

10 Q. Well, you've already said that, haven't
11 you?

12 A. Well, I'm modifying that to say, you
13 know, I know that there are messages and writings
14 of Mr. Purkerson in 2018, but I can't say --

15 Q. When did you first find out about them?

16 A. -- I can't say that that was the very
17 beginning of when he started making them.

18 Q. I'm asking you when you found out about
19 them. You said that was in 2018, I think, right?

20 A. I said it may have been 2018, but it --
21 when we started having the family court
22 litigation and Mr. Purkerson changed his tone and
23 attitude toward me. I know there were the
24 defamatory assertions, but I don't recall the
25 exact date of when I learned of them.

1 Q. You don't recall the exact date of when
2 you learned of it, but I think you testified that
3 you learned about them in 2018?

4 A. At least in 2018, because I know that
5 when Mr. Purkerson said he was going to get me
6 and get me good and can't wait to get his hands
7 around my neck was in 2018. And it was only --
8 and it was in October of 2018 that a sex crime
9 investigation was initiated which was subsequent
10 to his threats to get his hands around my neck.
11 So I -- and I know that was heard by others. So
12 I know -- I certainly know that was a date, but
13 I'd have to go through and see if there was
14 something.

15 But certainly they've been so continuous
16 in nature that -- if there was a track outside in
17 that green area and you ran that three times a
18 day for four years, could you tell me what day it
19 started raining during that four-year period of
20 time? You probably wouldn't. And this is --
21 when the crap starts flowing, it gets a little
22 bit blended together. But it's been so
23 continuous, even up to today. You know, and when
24 I say today, you know --

25 Q. What defamatory statements has Mr.



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1 Purkerson made about you today?

2 A. I said -- what I was trying to say was
3 I'm not saying today the 12th. Okay? I'm saying
4 up to the current period. Okay?

5 Q. When is the last defamatory statement
6 that you know of that Mr. Purkerson made about
7 you?

8 A. Well, that would have to come from the
9 testimony of other people. So that's the nature
10 of defamation is, one, that it's not true, and,
11 two, that it's shared with others. And others
12 don't call me every day that they may hear
13 something that they know is untrue because it
14 becomes monotonous, and it doesn't do me any good
15 to hear it. But so --

16 Q. Do you remember the instance of when you
17 first were told by somebody else that Mr.
18 Purkerson had said something about you that
19 wasn't truthful?

20 A. Not sitting here today I don't, no.

21 Q. So you can't recall when that happened
22 or who it was who told you about it?

23 A. Well, one, my daughter told me about it.
24 Nikkee Fleming, Jeff Fleming.

25 Q. So all these people are the first people

1 who told you about it?

2 A. I'm just saying they are people that
3 have told me about it. But I'm saying --

4 Q. I'm asking you the first time --

5 A. -- I'm saying I cannot tell you
6 exactly -- you know, I couldn't tell you the
7 date of the first time I had a bad meal at a
8 restaurant. I just don't recall.

9 Q. Well, have you ever sued a restaurant
10 for a bad meal?

11 A. If you want to assert that defamatory
12 statements as to an act of moral turpitude is
13 equivalent to having a bad meal, I'll let you
14 make that assertion, but I don't make that
15 assertion. And I've been personally damaged by
16 the entire Purkerson-Maples gang, and --

17 Q. Well, I'm not worried about the gang.
18 I'm worried about Bob.

19 A. Well, he's part of the gang.

20 Q. So you cannot tell me when anybody first
21 told you that Mr. Purkerson made an untruthful
22 defamatory statement about you? You can't tell
23 me when that happened or who it was who told you
24 about it the first time?

25 A. Not sitting here right now, huh-uh.

1 Q. You think that maybe that was in 2018?

2 A. I know there were defamatory statements
3 made in 2018. I can't tell you that that was the
4 first time I became aware of it and who told me.

5 Q. Who has told you that Bob Purkerson made
6 untruthful statements about you?

7 A. Well, I would prefer to phrase that as
8 what the person considered as defamatory because
9 they would not perhaps know whether it was the
10 truth or not the truth. If you say -- I mean,
11 the U.S. Supreme Court says if you -- if I said
12 Mr. Purkerson is a thief, that's defined by the
13 U.S. Supreme Court as defamatory per se and
14 actionable per se. So we're trying to wordsmith
15 this thing. Different people --

16 Q. No, we're not.

17 A. -- different people -- some people might
18 say, well, he's a thief is not defamatory. Some
19 people might say it is. Some people might say
20 inappropriately touching your child is defamatory
21 and some people might not. I don't know. But I
22 don't know -- but those things have been said,
23 and I guess it will be up to a jury to decide
24 whether they think it's defamatory or not when
25 people testify exactly what was said.

1 Q. You're going to testify in front of a
2 jury too, right?

3 A. Right.

4 Q. So has Mr. Purkerson ever called you a
5 thief that you know of?

6 A. Ever called me a thief?

7 Q. That's the example you just used, I
8 think.

9 A. I used that because that is a matter of
10 caselaw that's been cited for years and years.

11 Q. Okay. Well, I'm not asking for caselaw.
12 I'm trying to find facts.

13 A. Okay.

14 Q. What facts do you have -- and the first
15 fact I have tried to get to was when you first
16 found out about the defamatory statements. The
17 second fact I'm trying to get to is who has told
18 you about it, who were the third parties that he
19 made the statements to?

20 A. I told you that my daughter has told me
21 about it. Mr. Hoxie.

22 Q. Who is that?

23 A. He was the principal at Wake Christian
24 Academy.

25 Q. He was a defendant or no?

1 A. He was. He's one of your witnesses.

2 I'm anxious for you to take his deposition.

3 Q. Do you know Mr. Hoxie's first name?

4 A. Larry.

5 Q. Do you how to spell it? Is it H-o-x --

6 A. -i-e.

7 Q. All right. I have your daughter, Mr.
8 Hoxie. Who else?

9 A. Nikkee Fleming. Jeff Fleming, Zoie
10 Fleming. Tony Traynham. I'm told --

11 Q. Told by whom?

12 A. Pardon me?

13 Q. You just said you were told. Told by
14 whom?

15 A. I was told that Bobby Maples is aware of
16 that.

17 Q. So I want to know people who have
18 communicated directly to you that they heard Mr.
19 Purkerson defaming you.

20 A. Okay. Well, I'll rest on the link,
21 because it's like a chain. Like if you -- if
22 you're sitting at a picnic table and somebody
23 walks up to the first person at the picnic table
24 and there's 10 of them in a row and you whisper
25 something defamatory about me, by the time it

1 gets to the end of the table, the guy is a
2 murderer.

3 So these people in between will be able
4 to complete the chain, and that's one of the
5 reasons why I've been fighting like hell to get
6 the e-mails. And I think that would be much more
7 definitive.

8 Q. All right. I asked you who had told you
9 that Mr. Purkerson had made untruthful statements
10 about you.

11 A. So do you not assert that --

12 Q. I'm asking questions.

13 A. Okay. And I gave you a list of people.
14 And if I want to leave it at that, that's -- I'm
15 going to leave it at that.

16 Q. That's right. And I'm going to read
17 them out to you. When I asked you that question,
18 you said your daughter, right? Is that right?

19 A. Correct.

20 Q. You said Larry Hoxie, correct?

21 A. Correct.

22 Q. Okay. You said Nikkee Fleming, right?

23 A. Yep.

24 Q. You said Jeff Fleming? Sir?

25 A. Yep.

1 Q. And you said Zoie Fleming?

2 A. Yes.

3 Q. And you said Tony Traynham?

4 A. And I would add Dana Cordell, Kellie
5 Auerweck.

6 Q. And that's A-u-e-r-w-e-c-k?

7 A. Uh-huh.

8 Q. And Kellie is with an i-e at the end,
9 right, sir? I'm just doing that for her benefit.

10 A. Okay.

11 Q. Anybody else?

12 A. So I'll leave it at that as to what I
13 can recall right now.

14 Q. Okay. What has your daughter told you
15 that Bob has told her that was untruthful about
16 you? And I'm just going to go through the list.

17 MR. PUTNAM: Well, I object to the
18 question.

19 MR. SHULL: What's the basis for
20 the objection?

21 MR. PUTNAM: Well, restate the
22 question.

23 Q. What has your daughter Ella told you
24 that Bob said about you that was defamatory or
25 untruthful?

1 A. That your dad is a drug-abusing
2 alcoholic.

3 Q. Okay. Anything else that she's said to
4 you?

5 A. I'll have to look at my --

6 Q. Look at what?

7 A. I've got -- you know, you didn't ask me
8 to bring documents today, but I've got -- you
9 know, like I'd call pretrial notes of -- and I'd
10 have to consult other counsel to find out if
11 that's -- has any privilege or not, but I didn't
12 bring that with me, so --

13 Q. Okay. So Ella told you that Bob said,
14 quote, your dad is a drug-abusing alcoholic. Has
15 she said anything else that you can recall that
16 you believe is defamatory against you?

17 A. Well, she's -- it's been repeated to his
18 wife, Gail.

19 Q. Huh-uh. I'm asking you the specific
20 question, what has Ella told you, what are the
21 statements that she's repeated to you that Bob
22 made about you other than, your dad is a
23 drug-abusing alcoholic?

24 A. Well, the defamation occurs when he
25 tells others, not me.

1 Q. Right. That's what I'm trying to get to
2 is -- one of the people you said he told is Ella,
3 so is there anything else that she's told you
4 that Bob said about you?

5 A. I'll have to reflect on that.

6 Q. Okay. The next person is Larry Hoxie.

7 (Off-the-record discussion.)

8 Q. Do you-all want to just break for lunch
9 and come back? It's 12:38. I'll leave it up to
10 you.

11 A. You said this was going to last an hour
12 and a half between you and Mr. Churdar, and I've
13 been limited on Mr. Maples' deposition. So, you
14 know, at some point it's going to be time for me
15 to roll, so if you --

16 Q. You want to press on through?

17 A. If you have changed your mind about how
18 long you think it's going to take --

19 Q. She needs to use the restroom, and then
20 if you want to break for lunch we can do that or
21 we can press on through.

22 A. Well, I'm not planning on spending the
23 whole afternoon here and --

24 Q. I hope it won't take the whole
25 afternoon, but I have to -- the purpose is for me

1 to have some understanding of what your testimony
2 could be at trial, right?

3 A. Do you want me to pull up your e-mail to
4 me in terms of what you said that you would need
5 of my time --

6 Q. No.

7 A. -- and Mr. Churdar?

8 Q. No, I don't want you to do that.

9 A. Do you recall that?

10 Q. It doesn't matter what I recall and what
11 I don't recall.

12 A. Well, when -- I assume we're off the
13 record.

14 Q. No. We're still on the record.

15 A. Well, then, ask away.

16 (A recess was taken.)

17 Q. Back on. All right. Larry Hoxie, what
18 did he tell you that Bob Purkerson said about you
19 that was defamatory?

20 A. Well, he said that Mr. Maples had shown
21 him some information or communicated information
22 that he asserted came from Mr. Purkerson that led
23 him to file a report with the Wake County DSS.

24 Q. Did Mr. Hoxie ever tell you that Bob had
25 said something about you to him, to Mr. Hoxie?

1 A. Not that I recall.

2 Q. All right. The next one is Nikkee
3 Fleming. What has Nikkee Fleming told you that
4 Bob said to her about you that was defamatory?

5 A. We'll just start with a list of words.
6 Drug-abusing alcoholic. Irresponsible parent.
7 Unfit to be a parent. Repeated the allegations
8 of the sex crime investigation.

9 Q. When did Nikkee tell you that Bob told
10 her this about you?

11 A. I'd have to look at -- I had a number of
12 conversations since this lawsuit was filed.

13 Q. Well, no, I'm talking about before the
14 lawsuit. You had grounds for filing the lawsuit,
15 right, or did you just file the lawsuit and then
16 go find the grounds?

17 A. The lawsuit has -- there are grounds for
18 the lawsuit, and -- but I don't know the exact
19 date or time that --

20 Q. Can you estimate it?

21 A. Huh-uh. I've probably talked to -- over
22 the course of this since Bob, Mr. Purkerson's
23 daughter lost custody of her child --

24 Q. I don't know when that was. You brought
25 this lawsuit in 2019.

1 A. I know. I'm just trying to think about
2 the date of when that was and relate that to
3 another date. If you don't want me to process
4 that --

5 Q. No, go ahead, but it might take longer
6 than until 2:00 if you're going to do that for
7 every one of these. And I'm fine with that,
8 but --

9 A. Well, okay. Well, I'll just say I don't
10 recall the exact date.

11 Q. Had she told you that Bob had said those
12 things to her when you filed your original
13 complaint? And just to refresh your
14 recollection, the original complaint, I believe,
15 was filed -- bear with me.

16 A. Are you talking about the case that was
17 removed to federal court?

18 Q. This complaint that we're here about
19 today was originally filed in March of 2020, and
20 then you amended it in June of 2020. But you had
21 filed one that was removed to federal court, and
22 that was filed in 2019, right?

23 A. That's right.

24 Q. When you filed your original complaint
25 in 2019, at that point had Nikkee Fleming told

1 you these things that Mr. Purkerson allegedly
2 said about you?

3 A. I don't recall because Mr. Purkerson
4 wasn't named in the original case that was
5 removed to federal court.

6 Q. What about as of March of 2020, had she
7 told it to you by then?

8 A. Yeah.

9 Q. And she said that Bob said that you were
10 a drug-abusing alcoholic?

11 A. Among a whole list of things.

12 Q. Sure. No, I'm just repeating what you
13 just told me. The first thing you said was that
14 she told you that he said you were a drug-abusing
15 alcoholic, right? Isn't that what you just said?

16 A. Among others.

17 Q. You just told me -- I believe I wrote it
18 down -- that one of the things that Nikkee
19 Fleming said that Bob said about you was that you
20 were a drug-abusing alcoholic.

21 A. Well, I believe that's in one of the
22 text messages, but I can't sit here and affirm
23 the date.

24 Q. Then you also told me just now that he
25 said you were an irresponsible parent, correct?

1 That's what you just said.

2 A. Well, he sent me e-mails to that effect,
3 and the drug-abusing alcoholic. So it's not
4 surprising that it would be shared with others.

5 Q. But it doesn't matter what he told you.
6 I'm trying to figure out what he told Nikkee.

7 A. I know.

8 Q. So Nikkee told you also that he thought
9 you were unfit to be a parent. Isn't that what
10 you just said?

11 A. There's a lot of ways to say that a
12 person is unfit to be a parent without saying
13 those specific words. Okay? So I'm not saying,
14 quote, unquote, that. But if I said someone is
15 totally irresponsible in their parenting skills,
16 someone might interpret that as saying they're
17 unfit to be a parent. It could have been said in
18 a different way. How I processed it and remember
19 it could be different.

20 Q. All right. And then the last thing you
21 said was that she said that he repeated to her,
22 to Nikkee, the allegations of the sex crime
23 investigation, right?

24 A. Or parts of it.

25 Q. Okay. Anything else that Nikkee Fleming

1 has told you that Bob Purkerson said about you
2 that you believe are grounds for a defamation
3 lawsuit?

4 A. I'll have to go through and look at the
5 notes and messages.

6 Q. As we sit here today, is there anything
7 else that you can recall?

8 A. Well, not that I can sitting here.

9 Q. Jeff Fleming was the next person you
10 named. What did Jeff Fleming say that Bob
11 Purkerson told him about you that was untruthful
12 and defamatory?

13 A. Well, Jeff and Nikkee are married, so
14 they likely heard the same thing at the same
15 time.

16 Q. So the same thing as what Nikkee Fleming
17 told you?

18 A. Among others.

19 Q. What are the others?

20 A. You know, I don't know without looking
21 at notes, without looking at letters from Bob to
22 Jeff.

23 Q. Where are those letters?

24 A. You've got a copy of that.

25 Q. I do? Of a letter from Bob to Jeff?

1 A. An e-mail.

2 Q. Okay. Zoie Fleming. What has Zoie said
3 that Bob Purkerson said about you that was
4 untruthful and defamatory?

5 A. Well, Zoie told her stepmother, who then
6 told me.

7 Q. What did Zoie tell you?

8 A. She didn't tell me.

9 Q. She's never said anything to you?

10 A. I didn't say she's never said anything
11 to me. I said that during one of the visits,
12 Zoie couldn't wait to get away from all the --
13 what she believed also, very untruthful things,
14 so -- but Zoie is willing to testify, so I'll let
15 her speak to the specifics.

16 Q. All right. I need you to just answer
17 the questions I'm asking.

18 A. Well, okay. I'm saying I don't know
19 the --

20 Q. Let me repeat it. Zoie Fleming, has she
21 ever told you anything that Bob said about you to
22 her? And I'm not asking what she said to anybody
23 else, to her mother or her stepmother or
24 stepfather or father or whoever. Has she ever
25 called you up or has she ever e-mailed you or



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1 texted you and said, Bob just said X, Y, Z about
2 you?

3 A. Well, I believe there was a call where
4 Zoie was talking to Nikkee, and I could hear her
5 in the background talking to Nikkee. Not me
6 directly, but I heard what she was saying.

7 Q. So you overheard Zoie talking to Nikkee,
8 and what did she say?

9 A. I don't know who else was in the room.

10 Q. What did you hear her say to Nikkee?

11 A. That she had spent the last hour and a
12 half in the car with her grandfather, one of her
13 grandfathers and --

14 Q. Well, which one?

15 A. Well, Mr. Purkerson.

16 Q. You heard her say Mr. Purkerson or Bob?

17 A. Well, they had just gotten back from a
18 trip from Litchfield where Mr. Purkerson -- I
19 don't believe Mr. Fleming has a place at
20 Litchfield.

21 Q. And she said, I just spent the last hour
22 and a half in the car with my grandfather and --

23 A. All they could do is trash Michael.

24 Q. Did she go into any more detail other
25 than to say, all they could do is trash Michael?



1 A. I don't recall.

2 Q. And who is they, do you know who they
3 were?

4 A. I wasn't in the room, so --

5 Q. Well, you were listening?

6 A. Well, that could be -- Mr. Purkerson is
7 sitting in the room, but he's not saying
8 anything. So if I was just listening to this
9 room, I wouldn't know whether he was here or not.
10 So whether her dad, Jeff, was in the room, I
11 don't know.

12 Q. You just said, all they could do is
13 trash Michael, and I'm trying to figure out who
14 they is or who they were. You don't know?

15 A. No. I don't know who else might have
16 been in the car.

17 Q. All right. Tony Traynham, what has --
18 and he's a doctor, right?

19 A. A dentist.

20 Q. What has he told you that he says Bob
21 told about you that was defamatory and
22 untruthful?

23 A. Well, he walked up to me at the
24 CityRange restaurant and asked me why Mr.
25 Purkerson was trashing me and why his daughter



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1 had asked him to provide an affidavit or
2 something to that effect saying, you're a bad
3 parent, that you are an abusive alcoholic, that
4 you bring your child in there for hours on end,
5 and he asked me why -- you know, why they would
6 want to say such bad things about me.

7 Q. Did he go into detail about what Bob was
8 saying about you?

9 A. I think -- you know, the best I can
10 recall is the word trashing, but that's just the
11 best of my recollection.

12 Q. So Dr. Traynham told you that Bob was
13 trashing you?

14 A. Well, he, in effect, asked why the whole
15 family, including Bob

16 Q. I'm not worried about the whole family.
17 I want to know what he told you that Bob said
18 about you.

19 A. Well, I assume what he was asking me
20 about was from Bob, but he had also gotten a call
21 from Lyn.

22 Q. But, see, I'm not here about --

23 A. It's part of the whole -- it's part of
24 the conversation. That's what I'm saying.

25 Q. Right. But the question is what did he



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1 tell you that Bob said about you that was
2 untruthful or defamatory. He said that Bob was
3 trashing you. Did he say anything else?

4 A. Well, he generalized in just saying
5 that, you know -- I said, well, what did he say,
6 and he said, some really bad stuff.

7 Q. Did he elaborate?

8 A. And frankly in a place where there's a
9 lot of other people just hanging around, I didn't
10 want to -- and he didn't either want to further
11 define it.

12 Q. So you-all didn't discuss the details at
13 the CityRange?

14 A. Trashing me is enough for me. Okay?
15 However --

16 Q. Did you ever talk to Mr. Traynham about
17 Bob after that day at CityRange?

18 A. I saw him after that, but we didn't
19 discuss that.

20 Q. Have you ever discussed Bob with Tony
21 Traynham since that day at CityRange when he said
22 that Bob was trashing you and saying really bad
23 stuff about you?

24 A. No, because that was kind of just
25 pre-COVID and nobody was out socializing.

1 Q. Dana Cordell. What has Dana Cordell
2 told you that Bob said about you that was
3 untruthful or defamatory?

4 A. Dana Cordell wrote an affidavit that you
5 should have a copy of that describes that.

6 Q. All right. I've got a copy of an
7 affidavit from her. I think it's in this latest
8 packet of stuff you sent me in February, I think.
9 Maybe it's in this stuff that you sent me. Oh,
10 no. It's attached to one of these complaints.

11 A. And I --

12 Q. Just one second, just so I don't lose
13 track of things. I'm sorry to cut you off,
14 but -- all right. So Exhibit 1 to your March 6,
15 2020, complaint is a signed affidavit or
16 statement by Dana Cordell. Is this what you're
17 talking about? Do you want to look at that?

18 A. Well, I believe she wrote two.

19 Q. Well, let's talk about --

20 A. That was an initial --

21 Q. Well, let's talk about this one. I'm
22 going to hand it to you, and you tell me what in
23 here you believe is a defamatory statement made
24 by Bob to her, please.

25 A. Well, I think it's consistent with Ella

1 saying that her father has an alcohol problem
2 which was -- in bars and so forth, which was
3 reiterated to Ella by Bob. Well, I don't see a
4 direct reference to Bob.

5 Q. And you think there might be another
6 affidavit out there that Dana Cordell signed?

7 A. I'll have to look.

8 Q. Here's another. This one is signed
9 by -- let's go ahead and talk about her -- Kellie
10 Auerweck. What did she say to you that you
11 believe is untruthful and defamatory that she
12 said that Bob said about you?

13 A. Well, again, it's inference.

14 Q. And for the record, I've just handed you
15 Kellie Auerweck's statement, and you're reviewing
16 it, correct, sir?

17 A. One of them. Okay. Again, I don't see
18 a direct reference.

19 Q. Okay. You said there might be another
20 affidavit out there that references Bob and what
21 he was saying about you?

22 A. Well, I guess I would say I may have
23 been incorrect in saying that they had repeated
24 verbatim something that was told to them by Bob.

25 Q. All right. And then you also attached

1 as exhibits to your March 6th complaint -- the
2 third exhibit is a Greenville County Sheriff's
3 Office incident report. Have you seen that, sir?

4 A. Yeah. I guess it's the same.

5 Q. Did you type Exhibit 4 down in the lower
6 right-hand corner?

7 A. This says Exhibit 3.

8 Q. Excuse me. Exhibit 3.

9 A. I don't know if I did or not.

10 Q. Don't know?

11 A. No.

12 Q. Did Kellie Auerweck ever directly
13 communicate with you that Bob had told her
14 something about you that was incorrect or
15 defamatory or false or untruthful?

16 A. I just a moment ago said as to both Dana
17 and Kellie that my -- what I asserted earlier
18 might have been hearsay.

19 Q. All right. Those are the last two
20 people that you named in this deposition today.
21 Now, in your discovery responses that I had you
22 compelled by court order to give me to
23 interrogatory number five -- I'm going to read
24 the interrogatory to you again.

25 Set forth the specific contents of any

1 and all statements you allege Purkerson made
2 concerning you. For each statement, identify the
3 date of the statement, the persons to whom the
4 statement was made and any other persons present
5 when the statement was made if the statement was
6 a verbal communication. Or if the statement was
7 a written communication, identify the recipient
8 of the statement and all persons to whom
9 Purkerson provided a copy of the statement.

10 And here was your response: Wes, comma,
11 there are 36 pages of text messages regarding all
12 involved, including your client. I have not
13 deposed Nikkee Fleming, Jeff Fleming, Kearson
14 Maples and Zoie Fleming. All are able and
15 willing to testify as to defamatory statements by
16 Bob Purkerson. Depending on whether we have a
17 scheduling hearing and a discovery deadline will
18 determine who and when I am able to depose.

19 Additionally, separated by a piece of
20 colored paper in Exhibit -- this says T22. I
21 think maybe that was meant to be Exhibit 2 -- are
22 e-mails from Purkerson, and, of course, the one
23 where he was essentially assaulting me in his
24 driveway and indicates, quote, he can't wait to
25 get his hands on me, end quote -- hands, end

1 quote, on me, and he was going to give it to me,
2 quote, big time, end quote.

3 He also mentions DSS and the
4 investigation started shortly after this
5 confrontation where I was just trying to pick up
6 my child from Purkerson's house. I'm going to
7 e-mail the audio files because I need to change
8 the format from a WAV file to an MP file --
9 that's supposed to be MP3 file, maybe -- much
10 more audio that I will supplement after I can get
11 some professional assistance to make them more
12 audibly clear.

13 Do you remember sending that to me, sir?

14 A. Yeah. Is there a date on it?

15 Q. It's February 21, 2022.

16 A. Okay.

17 Q. Is there anything that you would like to
18 add to that answer I just read to you to
19 interrogatory number five?

20 A. Well, pending getting the e-mail
21 communications, I think there will be a
22 significant supplement once those are received.

23 Q. Do you have anything else you'd like to
24 add to that currently?

25 A. No.

1 Q. All right. Who are these text messages
2 from? These are from Nikkee Fleming?

3 A. I believe so.

4 Q. And these are part of Exhibit 2 to your
5 supplemental interrogatory responses of
6 February 21st?

7 A. Okay, yes.

8 Q. Correct? Go through these text
9 messages, if you don't mind, and show me the
10 defamation by Mr. Furkerson, please.

11 A. What was the request of the production?
12 How was the request worded?

13 Q. The request is interrogatory number
14 five, which I think you completely copied in your
15 response. Didn't you produce all that stuff?

16 A. This goes one, two, three, four, A, B,
17 C, D. I don't see the --

18 Q. All right. Let me show you. Complete
19 answers to interrogatory number five. And I just
20 read interrogatory number --

21 A. But are the text messages in response to
22 a production request?

23 Q. Did you provide me with this
24 information?

25 A. I did. But I'm asking is there a

1 production request saying, please provide me all
2 relevant text messages or whatever?

3 Q. Here's my question to you. You sent
4 this to me, correct?

5 A. I did.

6 Q. Okay. And part of Exhibit 2 are text
7 messages, I think from somebody named Nikkee.
8 Yes?

9 A. There are text messages from Nikkee in
10 there, yeah.

11 Q. Okay. So can you go through the text
12 messages that you produced to me and show me the
13 defamation committed by Bob Burkerson?

14 A. Well, I think the purpose of providing
15 this are the statements related to Kearson's
16 assertion that she saved everything from then
17 that they've said. I've been verbally told what
18 they've said.

19 Jeff just had to tell Bob P. off today
20 via e-mail for dragging Zoie into their mess and
21 told him and Lyn via e-mail they are abusive.
22 And in conversations with Nikkee and Kearson,
23 they expand on that, so -- and apparently have
24 audio that I don't have.

25 Q. Why don't you have the audio?



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1 A. It's up to her to whether she provides
2 it to me or not.

3 Q. Have you tried to get it from her?

4 A. Well, I think some of it is -- well, a
5 decent amount of it is on Zoie's phone. But as
6 you know, Mr. Purkerson -- and I don't know why
7 he would do this to his grandchild -- published
8 on the public index a complete, un-redacted copy
9 of the sex crime investigation.

10 Q. When did he do that?

11 A. When he provided his discovery.

12 Q. He, Mr. Purkerson --

13 A. Yes, sir.

14 Q. -- put a completely un-redacted copy of
15 the sex -- you're sure of that?

16 A. Well, it was provided to me as
17 discovery.

18 Q. Well, that doesn't matter?

19 A. Well, it's on the public index dated May
20 the 3rd.

21 Q. May the 3rd of what year?

22 A. 2020.

23 Q. And Purkerson put an un-redacted copy of
24 the sex crime investigation on the public index
25 on May the 3rd of 2020?

1 A. And I asked Mr. Maples to have it
2 redacted. I've asked the clerk of court to have
3 it removed. I asked you to have it removed,
4 which you refused to do.

5 Q. That's not true.

6 A. I asked you to remove it. In my request
7 for modification to the order, I said, remove
8 these pages and also remove the May 3rd filing of
9 an un-redacted copy of the sex crime --

10 Q. How can I remove something that I didn't
11 file?

12 A. You can request it of the Court.

13 Q. How can I request somebody to redact
14 something that's not mine?

15 A. You can. Ask the Court.

16 Q. Okay. So the Court just does whatever I
17 ask them to do?

18 A. Well, the judge just said to make sure
19 that everything is redacted that --

20 Q. You're talking about Judge Maddox?

21 A. Yeah.

22 Q. Okay. Well, here is my motion that I
23 did file on the public index to compel you to
24 produce those items that you're flipping through
25 right now.

1 A. And have you got Exhibit A there?

2 Q. There it is.

3 THE WITNESS: So, Bob, did you know
4 that your attorney put Ella C. Putnam on --

5 MR. SHULL: You don't ask --

6 THE WITNESS: -- the public index
7 with her date of birth so that she could be
8 mocked and harassed and discriminated against in
9 applying for jobs and going to college, and this
10 sat out there for 45 days?

11 Q. All right. You're not supposed to ask
12 questions. That's not your role here.

13 A. I didn't ask him to answer it.

14 Q. Why would you ask a question if you
15 don't want it answered? All right.

16 A. Because -- and --

17 Q. That's redacted, isn't it? Let me see
18 it.

19 A. It's got my full name and --

20 Q. What's the difference between that and
21 what you attached to your complaint? Show me.

22 A. Well --

23 Q. Show me the difference.

24 A. If you'll look at his discovery -- look
25 at his discovery.

1 Q. No. We're talking about something that
2 was filed on the public index.

3 A. All right. Go to May 3rd. It's
4 completely un-redacted.

5 Q. No, answer my question that I'm asking
6 you. What's the difference between what you
7 attached to your complaint and what I attached to
8 my motion right there?

9 A. Because there are redactions to this.

10 Q. There are some redactions on both,
11 aren't there? Show me where there are redactions
12 on one and not on the other.

13 A. This is not from the May 23rd [sic]
14 filing.

15 Q. I didn't file anything on May 23rd. I
16 filed that motion on December 23rd.

17 A. Well, Mr. Maples is pro se, and Mr.
18 Purkerson --

19 Q. No. Mr. Purkerson didn't file anything
20 on May 3rd.

21 A. Well, he filed it as production, and
22 their production and their answers to
23 interrogatories were exactly duplicates.

24 Q. Well, don't you need to take that up
25 with Mr. Maples?

1 A. I have.

2 Q. All right. I filed a motion for summary
3 judgment and Judge Verdin denied that. Do you
4 remember that?

5 A. There have been so many motions for
6 summary judgment. Mr. Maples files one a month
7 or did.

8 Q. Who do you think has filed more motions
9 in this action, you or any of the other parties?

10 A. I file motions in response to things.
11 If you file a motion for summary judgment and I
12 file a motion in opposition, I don't think that's
13 inappropriate.

14 Q. And the reason why I'm asking you is you
15 provided a list of I believe 18 names in response
16 to Judge Verdin's order to me. Do you remember
17 that?

18 A. Of witnesses?

19 Q. Her order compelled you to provide a
20 list of names of people in the community that you
21 said could testify as to Bob's defaming. Do you
22 remember that?

23 A. I remember that I had filed a redacted
24 copy because I did not want to put other people's
25 information out on the public index.

1 Q. I don't think you filed this on the
2 public index. I'm just talking about what you
3 sent to me, and I guess it was to Rob because he
4 was unrepresented at the time. It had a list of
5 18 names on it.

6 A. Well, I did file and put on the public
7 index that list of names, but it only had first
8 initial, last initial.

9 Q. And some of those names included the
10 people that we've talked about today, correct? I
11 mean, do you remember sending that to me? Let me
12 go grab a copy of it. Let's go off real quick.
13 I'll be right back.

14 (Off-the-record discussion.)

15 Q. All right. Here it is. It's dated
16 May 7, 2021. Dear gentlemen, please find
17 enclosed plaintiff's answers and responses to the
18 Form 4 order issued by the Honorable Letitia H.
19 Verdin on April 27, 2021. In a note of
20 clarification from Judge Verdin's law clerk,
21 Patrick Fant, dated May 5th, 2021, Mr. Fant
22 stated the following, which I used as guidelines
23 in preparing the attached and scheduled names.

24 Quote, the Court only included, quote,
25 mutual friends or acquaintances in Greenville,



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1 South Carolina because of how it was pled in the
2 plaintiff's complaint. If there are other
3 individuals in addition to these individuals in
4 Greenville, the names should be stated in
5 specificity who they are and where they live, end
6 quote.

7 And then you put, of course, people do
8 move, and the information as to a person's city
9 or state is based on my knowledge or other
10 available resources.

11 Do you remember that letter?

12 A. Okay. It's got my signature on it.

13 Q. So my question to you is you listed Gail
14 Purkerson, Amy Creamer, Barbara Hawkins, Diane
15 Jeter, Tony Traynham and Carol Morgan, and those
16 are all people that you listed as in and around
17 Greenville, South Carolina, correct?

18 A. Correct.

19 Q. Do you want to see this?

20 A. No, huh-uh.

21 Q. Out of all those people, we've only
22 talked about Tony Traynham. The other remaining
23 five people, Gail Purkerson, Amy Creamer, Barbara
24 Hawkins, Diane Jeter and Carol Morgan, did any of
25 those people tell you directly that Bob had

1 defamed you or said something untruthful,
2 defamatory about you? I'm not asking did any of
3 them tell somebody else who -- you caught wind of
4 it, but is there any direct communication with
5 any of those people?

6 A. Well, I'm sure Mr. Purkerson talks to
7 his wife.

8 Q. No, no, I'm not asking that. Did Gail
9 Purkerson call you up or e-mail you or text you
10 and say, Bob just said X, Y, Z that was bad about
11 you?

12 A. No. That's why I had mentioned about
13 deposing Gail because of the one person in the
14 family, I think she'll tell the truth. And the
15 other people, Diane Jeter, Barbara Hawkins, Carol
16 Morgan, I've looked on Facebook and found what
17 looks like -- you know, kind of like secret
18 communication, talk -- you know, chats between
19 them. And I think Gail could reveal that and
20 would.

21 Q. So the answer to my question is, no,
22 none of those people have communicated with you
23 directly?

24 A. No.

25 Q. Okay. Continuing on this list with

1 numbers 7 through 14, you listed Gloria Walker,
2 Taylor Wilson Tucker, Jeff Fleming, Nikkee
3 Fleming, Zoie Fleming -- and Zoie is Z-o-i-e.
4 You listed Robbie Purkerson, Carol Purkerson, and
5 you listed Bobby Maples and wife. And Bobby's
6 wife is?

7 A. Kearson.

8 Q. Kearson. So out of that group of
9 people, we've already talked about Jeff Fleming.
10 We've already talked about Nikkee Fleming. We've
11 already talked about Zoie Fleming, and we've
12 already talked about Kearson, who is Bobby
13 Maples' wife, right?

14 A. Right. Well, ex, I think.

15 Q. Ex-wife?

16 A. (Nodded.)

17 Q. All right. So that leaves Gloria
18 Walker. Has she ever said anything directly to
19 you quoting Mr. Purkerson as having defamed you
20 or has said something untruthful about you?

21 A. No.

22 Q. What about Taylor Wilson Tucker, whoever
23 that is? Has that person -- Taylor, is that a
24 man or a woman?

25 A. That's a woman.

1 Q. What's the relation there?

2 A. She's Mr. Purkerson's niece, I believe.

3 Q. Did Taylor ever tell you that Bob had
4 said something untruthful and defamatory about
5 you?

6 A. We're talking about almost a year ago,
7 correct?

8 Q. I'm talking about when you filed the
9 lawsuit.

10 A. Well, I'm talking about the date of this
11 information that you're looking at.

12 Q. Okay. So that's dated May 7, 2021,
13 almost a year ago.

14 A. Right. And I'm confident that in the
15 e-mail communication string, that will all be
16 obvious. And I certainly thought that I would
17 have that by now and would be able to make that
18 connection.

19 Q. Is the answer to my question no with
20 regard to Taylor Wilson Tucker?

21 A. Having talked to me directly?

22 Q. Yes.

23 A. No. Yes. Well, she hasn't talked --
24 it's a double negative.

25 Q. She's never said anything to you?

1 A. She's never said anything to me. None
2 of those --

3 Q. What about Robbie Purkerson?

4 A. None of those people have said anything
5 directly to me.

6 Q. None of these people that are attached
7 to this letter?

8 A. Well, Nikkee Fleming has. Kearson
9 Maples has.

10 Q. Nikkee Fleming has? Oh, that's right.
11 You told me about what she said. Go ahead. I'm
12 sorry.

13 A. Well, I'm saying some of those people
14 have.

15 Q. Yeah, right. The people that we haven't
16 separately discussed earlier in this deposition
17 that are on this list who are -- who I believe is
18 Gloria, Taylor, Robbie, Carol and Bobby, have
19 they ever directly said anything to you repeating
20 what Bob told them about you?

21 A. Well, for instance, Amy Creamer was told
22 by -- not directly by Bob but --

23 Q. Okay. Well, then that's the question.
24 Then you just say no. Is the answer no?

25 A. Yeah.

1 MR. SHULL: I would like to have
2 this marked as Defendants' Number 3.

3 (Exhibit No. 1 was marked for
4 identification.)

5 (Exhibit No. 2 was marked for
6 identification.)

7 (Exhibit No. 3 was marked for
8 identification.)

9 Q. Now, I had the deposition notice marked
10 before you got here and the order of Judge Miller
11 marked before you got here. And I would like for
12 you to --

13 A. Judge Miller was just to make sure we
14 had the deposition today?

15 Q. That's right. All right. I'm going to
16 hand you this. This is your responses to Mr.
17 Purkerson's first set of interrogatories.
18 Actually, that's part of the motion that I filed.
19 There's another list of names that you produced,
20 and these were part of your original responses to
21 Purkerson's first set of interrogatories. Does
22 that look --

23 A. Witnesses?

24 Q. Yes, sir.

25 A. I don't think I affirmed that I had



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1 received written or recorded statements from
2 these people.

3 Q. You provided that list of witnesses,
4 right?

5 A. That was the answer, who do you intend
6 to call as witnesses.

7 Q. Sure. Okay. Can I have it back real
8 quick, please? Thank you. So my question to you
9 there is Lyn Maples, you plan on calling her as
10 your witness against her father?

11 A. I haven't -- I don't have my pretrial
12 plan or whatever else taken that far down the
13 line.

14 Q. I assume -- well, I won't assume. Has
15 Lyn ever said to you anything about Bob defaming
16 you?

17 A. In an e-mail probably.

18 Q. An e-mail that you provided to me?

19 A. I would have to go through every e-mail.

20 Q. All right. The next person on the list
21 that we haven't discussed is Chyna Nunez,
22 C-h-y-n-a N-u-n-e-z, with the Greenville County
23 Sheriff's Office. Do you plan on calling her as
24 a witness?

25 A. She's on your list of witnesses, so --

1 Q. These are your responses, I believe.

2 A. Well, I certainly intend to answer and
3 reply to --

4 Q. Has Ms. Nunez or Officer Nunez ever told
5 you that she had a communication with Mr.
6 Purkerson in which he defamed you?

7 A. I don't recall. I'd have to look at my
8 notes from 2018, 2019 when the investigation was
9 going on.

10 Q. So you don't recall?

11 A. I don't recall.

12 Q. All right. Amy Cramer, what has she
13 told you that Bob said to her?

14 A. I said that Bob didn't say anything
15 directly to her, that Dr. Traynham did.

16 Q. Ginger P. Pop. That's your sister, I
17 think, who lives in Pawleys Island?

18 A. That's correct.

19 Q. Has Ginger Pop ever told you that Bob
20 defamed you to her?

21 A. I'll have to reask her because I
22 obviously came up with that list more than a year
23 ago.

24 Q. Don't remember?

25 A. No, sir.



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1 Q. But as we sit here, you can't say yes to
2 that question?

3 A. I can't definitively say yes.

4 Q. All right. There's somebody named Ms.
5 Elizabeth Martin-Young. Who is she?

6 A. She's the guardian ad litem.

7 Q. Did that person ever tell you that Bob
8 was talking bad about you and defaming you?

9 A. I believe she has.

10 Q. What did she tell you?

11 A. I'll have to look at my -- I have -- she
12 was the guardian. She's been the guardian for
13 five years, so I've got a lot of notes to look
14 at.

15 Q. She's the guardian ad litem in the
16 family court case?

17 A. Right.

18 Q. But you don't remember what she said to
19 you specifically?

20 A. I've had a thousand conversations with
21 her, and I'll have to look at my notes to --

22 Q. So you're not sure that she -- you
23 believe that she told --

24 A. I believe she did.

25 Q. And you don't remember what she said?

1 A. In five -- well, Ms. Purkerson took me
2 to court in 2015. So in seven years of family
3 court litigation, a lot of crap has gone under
4 the river bridge, and for me to sort that out in
5 my mind right now, I couldn't do that. And it
6 continues today.

7 Q. How does it continue?

8 A. Well, we're pending a ruling on --

9 Q. The family court case continues?

10 A. Yeah.

11 Q. Okay. We've already talked about
12 Barbara Hawkins. We already talked about Diane
13 Jeter, and we already talked about -- Robin Cary
14 Maples is on here. He used to be a defendant,
15 right?

16 A. He's a witness.

17 Q. Has Rob Maples ever told you that Mr.
18 Purkerson said false and defamatory statements to
19 him about you?

20 A. He has in e-mails.

21 Q. Did you provide those e-mails to me?

22 A. I think I provided what I had.

23 Q. All right. I asked you earlier about
24 any financial losses on account of the alleged
25 defamation that Mr. Purkerson committed. Do you

1 feel like you lost wages on account of the
2 alleged defamation?

3 A. I don't know.

4 Q. Why don't you know?

5 A. Because of the actions of Maples and
6 Purkerson --

7 Q. I'm not worried about Maples' actions..

8 A. I understand. I understand. But when
9 you publish something, the reputational damage --
10 I don't know. You know -- I'll let a jury spread
11 that mayonnaise on the bread.

12 Q. So the answer is -- well, let me ask.
13 Is there a job out there that you were an
14 applicant for that you did not receive, you
15 didn't get a job offer because of anything that
16 Mr. Purkerson has ever said about you?

17 A. Well, let me say this. There are
18 references if you just google my name that have,
19 as a result, sex offender and six pictures below
20 it, none of which my pictures are in, but which
21 also reference Mr. Purkerson in the title of the
22 Google search, so --

23 Q. What jobs did you apply for where a
24 Google search prevented you from getting a job
25 offer?

1 A. I have -- since my ankle is -- I'm past
2 my third surgery. Since my ankle has gotten
3 better, I've started to try to improve my social
4 life. And I get invitations probably 10 times a
5 week to go out with ladies, but as soon as they
6 find out my real name and google me, I never get
7 a phone call back. And --

8 Q. Does that cost you money?

9 A. And I don't know how you put a dollar
10 amount on the shredding of your reputation in the
11 town that you were born in.

12 Q. Have you not gotten any job -- have
13 there been job opportunities that you didn't get
14 because of something that Mr. Purkerson said
15 about you?

16 A. I know that the people I would call if I
17 was going to try -- like Robert Half will not
18 even return my phone call because it's so
19 pervasive.

20 Q. Have you tried to work, have you sought
21 employment since you were put on social security
22 disability benefits?

23 A. No, because that was about the same time
24 I fell.

25 Q. So the letter from the order from the

1 Social Security Administration that you were sent
2 finding you eligible, when did you receive it?

3 A. I think 2017 or '18.

4 Q. This doesn't have a date on it that I
5 can see. Maybe I'm wrong. But you provided me
6 with this. It's Exhibit 5 to your February 21st
7 supplemental responses. Is that --

8 A. This is November 19, 2017.

9 Q. Okay. Thank you. So since November 19,
10 2017, have you applied for work or sought
11 employment anywhere?

12 A. Well, it was only six months or so after
13 that that I broke my ankle.

14 Q. Okay. So since this was sent to you in
15 2017 -- what's the date again, sir?

16 A. November 19, 2017.

17 Q. You haven't applied for any work since
18 November 19, 2017?

19 A. Well, due to Mr. Purkerson's actions,
20 less than a year later, I was under a sex crime
21 investigation based on fraudulent communication
22 from Mr. Purkerson and --

23 Q. Is the answer, no, you haven't applied
24 for work since you were put on social security
25 disability?

1 A. That's correct.

2 Q. Okay. You have a bag in here; is that
3 right, or a briefcase?

4 A. Yeah. I've got a deposition this
5 afternoon later.

6 Q. Okay. That you're taking?

7 A. I'm sitting in.

8 Q. Are you talking about this deposition?

9 A. No. I'm talking about related to the
10 med mal.

11 Q. I got you. What all is in your
12 briefcase?

13 A. Stuff for later for my med mal.

14 Q. Nothing related to this case?

15 A. No, I don't think so.

16 Q. Is there any kind of recording device in
17 it?

18 A. No.

19 Q. I listened to the disk that you sent me.
20 You sent me a disk with a letter. The letter is
21 dated March 14th. And I listened to what was on
22 the disk again this morning, and it appears that
23 most of those recordings were between you and
24 Zoie; is that correct, sir?

25 A. No. They're between --

1 Q. Or Kearson?

2 A. They're between -- well, some are
3 between Ms. Maples and Zoie.

4 Q. So when I -- sorry.

5 A. And some are, I think, between myself
6 and Kearson Maples.

7 Q. When I listened to them, they all
8 sounded like they were between you and Kearson
9 except for this one that's called, Lyn talking to
10 Zoie in car; is that right?

11 A. Uh-huh.

12 Q. Is that yes?

13 A. Yes.

14 Q. All right. Was Kearson aware that you
15 were recording her during these other recordings?
16 I believe you-all were on the phone together?

17 A. Yeah, she was not.

18 Q. She didn't know you were recording her?

19 A. North Carolina is a single-consent
20 state.

21 Q. Which state?

22 A. North Carolina.

23 Q. Okay. The recording of Lyn talking to
24 Zoie in the car, how did you get that?

25 A. From Zoie.

1 Q. So Zoie recorded her mom in the car?

2 A. Uh-huh.

3 Q. Is that a yes?

4 A. Yes. I'm sorry.

5 Q. Were you in the car at the time?

6 A. No.

7 Q. And all the other recordings, the two
8 parties are you and Kearson, right?

9 A. Well, this is Ms. Maples talking about
10 me.

11 Q. Who is?

12 A. Ms. Maples, his daughter.

13 Q. Yeah. When she says, Michael is evil?

14 A. Well, she says a lot more than that, but
15 I had to -- I'm just putting --

16 Q. Who recorded that?

17 A. Zoie.

18 Q. Now, I listened to it. I didn't hear
19 Bob Purkerson's name in any of this stuff. I
20 really didn't. When you listened to it, did you
21 ever hear any mention of Bob Purkerson when you
22 listened to what you sent me?

23 A. Well, I'd have to re-listen to -- I've
24 listened to it, and I was going to tell you that
25 I had some additional that had -- that I did have

1 somebody clean up to make them legible that I --

2 Q. Okay. As you sit here today, can you
3 recall Bob's name being mentioned on those
4 recordings that you sent to me?

5 A. I don't recall.

6 Q. And then you sent me another recording
7 of Bob when he said he wanted to put -- what did
8 he say again?

9 A. Oh, well, in this first recording,
10 Kearson mentions Bob Purkerson.

11 Q. I didn't hear it. You've put that in
12 the title, but I didn't hear it.

13 A. It's in there, yeah.

14 Q. There's a mention of Bobby?

15 A. No. She -- you may have gotten confused
16 between Bobby and Bob, but --

17 Q. So you're telling me in the recording
18 that you titled, quote, alienation and comments
19 regarding Bob P., sit with daddy, Rob, March 2022
20 talks about Bob Purkerson?

21 A. She does.

22 Q. What does she say about Bob Purkerson?

23 A. That -- well, I haven't listened to it
24 since I sent it to you.

25 Q. All right. In your February 21st

1 supplemental discovery responses, you included a
2 transcript from a recording that you had sent me
3 from August of 2018?

4 A. Correct.

5 Q. And it's labeled as Robert Purkerson's
6 threats to Michael G. Putnam?

7 A. Right.

8 Q. Did Mr. Purkerson know that you were
9 recording him when you took that recording?

10 A. No. Again, it's a single-consent state.

11 Q. And it took place in his driveway? Is
12 that where it took place?

13 A. Well, out in the street.

14 Q. Okay. Where does he defame you there?
15 Was there anybody else present when this was
16 recorded?

17 A. Yes. His wife, my child. He was trying
18 to chest pump me and --

19 Q. Okay. This says that he said, okay, I
20 can't wait to get my hands on you, buddy.

21 Now, what's defamatory about that?

22 A. It's a threat.

23 Q. Okay. Is it defamatory? Is it a false
24 statement about you?

25 A. Well, I don't know that --

1 Q. You had actually just filed a lawsuit
2 against him, hadn't you, in March and then
3 re-filed the complaint in June. Did you expect
4 him to be happy with you?

5 A. His -- if you want to call it his
6 unhappiness, started well before the lawsuit was
7 filed.

8 Q. Is anything on this piece of paper right
9 here defamatory? Is anything a false statement
10 about you that defames your character? You said,
11 well, we still got a ways to go, don't we, and
12 then he said -- according to you, he said, yeah,
13 they do.

14 A. Yeah, we do.

15 Q. Or you said, well, we still got a ways
16 to go, don't we. Yeah, they do. And then he
17 said, you're going to get yours because I'm going
18 to give it to you big-time.

19 A. I didn't --

20 Q. Is there anything defamatory?

21 A. I didn't send you a recording of that.

22 Q. You did.

23 A. Were you able to listen to it?

24 Q. I did.

25 A. Was he able to listen to it?

1 Q. I don't know. But my question to you
2 because this is your deposition is, is any of
3 that defamatory? Maybe it's not nice. Is it
4 defamatory?

5 A. I think if you threaten somebody with
6 assault, you better have a damn good reason to do
7 it.

8 Q. Is any of that defamatory?

9 A. Not as recorded.

10 Q. I think if you file a lawsuit, you
11 better have some evidence

12 A. Well, you know, the Greenville police
13 say I can file an action for assault any time I
14 want to.

15 Q. All right. And attached to this is an
16 e-mail from Bob to Jeff Fleming. How did you get
17 a copy of this?

18 A. I would guess from Jeff.

19 Q. All right. Why did you take out the
20 date? It just says September, and then it looks
21 like you whited out the date. Why did you do
22 that?

23 A. I don't know.

24 Q. And it looks like you blocked out
25 something up here. Why did you do that?

1 A. I don't know what was up there. It
2 might have been sent to me that way. I mean, it
3 was a scanned document.

4 Q. Jeff might have sent it to you with
5 those redactions?

6 A. I don't know, but --

7 Q. What's defamatory in what Bob said to
8 Jeff there?

9 A. Michael is a sick, desperate man.

10 Q. All right. He called you sick and
11 desperate. And that's the defamation?

12 A. I think that is defamatory.

13 Q. You're sick, aren't you? I mean, you've
14 got a broken ankle?

15 A. I don't have a broken ankle anymore.

16 Q. Well, you have an injured ankle?

17 A. I have an ankle replacement.

18 Q. I'm sorry, an ankle replacement. And
19 you have some other ongoing health issues, don't
20 you?

21 A. If you call high blood pressure and --
22 at age 66 or have an atrial fib major medical
23 issues, I guess I do.

24 Q. And when he says that he -- when Bob
25 said that you were manipulating Jeff, you think

1 that's defamatory against you?

2 A. If you say that somebody is manipulating
3 you, I think that's defamatory.

4 Q. All right. Here's an e-mail that you've
5 included from Bob to you, and it cc's Maggie
6 Nowell, N-o-w-e-l-l.

7 A. Yeah.

8 Q. Who is she?

9 A. She is Ms. Maples' first attorney.

10 Q. And this says, all communications with
11 Gail and me must come to me at my e-mail address
12 or home phone. Do not continue texting and
13 calling Gail, who is Mr. Purkerson's wife. I am
14 your only contact starting now.

15 Where is the defamation in any of those
16 statements?

17 A. Well, it's simply not in accordance with
18 the order of the court.

19 Q. Which court?

20 A. Family court.

21 Q. And then here's another communication
22 that's part of Exhibit 3, and this is an e-mail
23 from you -- from Bob to you. Now, why did you
24 take the date out of that?

25 A. I don't know, because some of this

1 information was part of the federal case. You
2 know, I'm not an attorney, so --

3 Q. Well, you represent yourself though,
4 right?

5 A. Yeah, but --

6 Q. Why would you redact a date out of
7 something that was submitted as part of a federal
8 case?

9 A. Well, when Judge Verdin releases the
10 e-mails, then they'll be un-redacted as to the
11 dates, so you should have --

12 Q. You've got this e-mail, because this
13 came from you, right?

14 A. Well, I don't know. I mean, if I
15 printed it out in my history.

16 Q. All right. And here's the body of the
17 e-mail. It says, I understand you are lawyered
18 up, and we will get lawyered up. The lawyers
19 will try to assassinate the character of each
20 person and everybody will loose, and a judge -- I
21 think that's probably supposed to be lose -- and
22 a judge will make a decision and probably get DSS
23 involved. What will happen to Ella and where
24 does this end and when will you get out of our
25 lives, question mark.

1 So my question to you is where is the
2 defamation in that communication?

3 A. Well, I would say that one of the ways
4 that you get out of their lives, which includes
5 my precious daughter, is to defame me to my
6 daughter, and they've done a damn good job of
7 that.

8 Q. All right. You amended your complaint
9 to -- your federal complaint to include Mr.
10 Purkerson back in August of '19.

11 A. Yeah.

12 Q. Is that right?

13 A. Yes.

14 Q. So August of '19, how long ago was that?

15 A. August the 19th of --

16 Q. August 26th of 2019 is when you filed
17 the amended complaint adding Mr. Purkerson as a
18 defendant. Do you remember doing that?

19 A. Yeah, I remember doing that.

20 Q. And here it is. Do you disagree with
21 that date?

22 A. Well, I mean, it would be on the case
23 file.

24 Q. So you've had over three years, going on
25 four years since you've added Bob Purkerson as a

1 defendant to your lawsuit, defamation lawsuit,
2 correct?

3 A. Yeah.

4 Q. And in that three and a half, almost
5 four years, we've gone over the evidence that you
6 have showing that Bob Purkerson defamed you.
7 Have we done that today other than the e-mails
8 that you're waiting to get from Google?

9 A. Well, no. Outside of -- I think you've
10 got to include the testimony of other people that
11 are eyewitnesses, personal witnesses to what Mr.
12 Purkerson has said to them in front of my
13 daughter and others. And I think to leave that
14 out, if you think I wouldn't attempt to try the
15 case without having knowledge of what Ms. Fleming
16 and Ms. Kearson --

17 Q. Well, you talked about what your
18 knowledge is, right, you told me the truth about
19 what they told you that Bob said, right?

20 A. Well, if you read in those text
21 messages, Kearson Maples says, I can't wait for
22 Michael to depose my ass, quote, unquote.

23 Q. Where is that? That's in these text
24 messages?

25 A. It should be.

1 Q. I don't see any text messages from
2 Kearson. These all appear to be from Nikkee. So
3 what you're saying is there's testimony from
4 these people we've talked about, and I think
5 we've culled that down to Ella, Nikkee --

6 A. We haven't culled anything down until we
7 get these e-mails.

8 Q. Let me finish the question, please.
9 Thank you. Ella, Nikkee, maybe Jeff and maybe
10 Zoie because you said you overheard a
11 conversation between Zoie and her mother, is that
12 right?

13 A. Well, you included Ella in that,
14 correct?

15 Q. Yeah. Ella is one of the people we
16 talked about today that you listed when I was
17 asking you --

18 A. Well, Doug has indicated he intends to
19 call her as a witness, so --

20 Q. When I asked you earlier in this
21 deposition to name the people who had told you
22 that Bob had defamed you to them, Ella was one of
23 the -- she was actually the first person you
24 mentioned?

25 A. Yeah. Okay.



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1 Q. Okay? Why have you not gotten
2 affidavits from any of these folks who you say
3 came to you and first-hand reported to you what
4 Bob had told them about you? And you've had
5 three and a half years to do it.

6 A. Well, for two of those years, we were
7 under a pandemic and it was -- the courts were
8 extremely slow, and --

9 Q. What does the court have to do with
10 getting an affidavit from a witness?

11 A. Because -- well, one, I didn't know
12 until a certain point in time what the
13 relationship was between Kearson, Bobby, Rob and
14 Lyn. Lyn filed the family court action in August
15 of 2015 as a single person. On Facebook, there's
16 a picture of her getting married in front of a
17 big house with all these people and my daughter
18 standing on the front porch as a flower girl or
19 something, and then I find out that she got
20 married in Las Vegas a year earlier before she
21 even filed the damn family action where she
22 asserted she was a single person and filed a
23 fraudulent financial declaration saying she was
24 single as well, when she was already married.
25 You know --

1 Q. So I just asked you a question about
2 affidavits and why you haven't gotten anybody to
3 sign an affidavit in three and a half years, and
4 then you start telling me about Lyn's marriage in
5 Las Vegas. So can we -- please just answer the
6 question.

7 A. The reason I haven't is I think it would
8 be a 20-page book from --

9 Q. As to why you haven't gotten any signed
10 affidavits?

11 A. They just want their chance to tell
12 their story.

13 Q. So you've asked them for affidavits and
14 they've --

15 A. I haven't asked them for affidavits.

16 Q. Why have you not asked them?

17 A. Because they've got so much to say, I
18 don't think you could -- I think it would be
19 overwhelming to do that.

20 Q. Just too much for them?

21 A. Both of them are working moms and have
22 children, small children, one disabled, very
23 small child.

24 Q. Who is that?

25 A. Nikkee Fleming.

1 Q. So one of your witnesses is a disabled,
2 very small child?

3 A. No. I'm saying her mother, Nikkee --
4 okay? -- has to take care of a child that every
5 two months has to have a surgery of some sort to
6 help with her -- lengthening her bones and that
7 kind of thing. She's a very busy woman. Kearson
8 Maples has a 4-year-old and a 10- or 11-year-old
9 daughter. She's a single mom now. I'm fine with
10 just turning them loose, which is why I decided
11 not to depose them. That's not necessary.

12 Q. So you think that even though they're
13 too busy to sign an affidavit, you're going to be
14 able to drag them to trial to testify on their
15 behalf?

16 A. Drive them?

17 Q. Drag them. You realize that they're
18 going to have to testify, right?

19 A. Yeah.

20 Q. You have to put up a case?

21 A. Yeah.

22 Q. Okay. And you do realize you've got the
23 burden of proof in your case?

24 A. If you're trying to ask me questions
25 as -- to provide you a totally correct legal

1 response, I don't think I'm in a position to do
2 that. I'm just a --

3 Q. Do you realize that you have to prove
4 your case?

5 A. Yes.

6 Q. Okay. Is there anything else out there
7 that we haven't talked about evidence-wise which
8 you believe proves your case against Mr.
9 Purkerson?

10 A. Besides the e-mails?

11 Q. That we haven't talked about. We've
12 talked about e-mails. We've talked about some
13 witnesses.

14 A. Well, once you get a witness on the
15 stand, I don't think there's any way to sit here
16 today and predict what they're going to say or
17 what may be revealed. I know it's not going to
18 be good.

19 Q. Which witness? Anybody we haven't
20 talked about?

21 A. Well, if we had the e-mails, there might
22 be 25 more on there that -- and there might be
23 evidence of Mr. Maples and Mr. Purkerson sharing
24 and conspiring to do something.

25 Q. There's always a hope. There's always a

1 chance.

2 A. Well --

3 Q. What's that movie? It's Dumb and
4 Dumber. So you're saying there's a chance?

5 A. Yeah. Well, and he ended up marrying
6 that girl.

7 Q. Well, anything else you want to tell me
8 about your case?

9 MR. SHULL: I'm going to give you a
10 chance to think about that if you want to, and in
11 the meantime, can we break and I will talk to
12 him.

13 (A recess was taken.)

14 (The deposition was concluded at
15 2:38 p.m.)

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CERTIFICATE OF REPORTER
STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

I, Valerie G. Melkus, Registered Professional Reporter and Notary Public for the State of South Carolina at Large, do hereby certify that the witness in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and location therein stated; that the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed by computer-aided transcription; that the foregoing is a full, complete and true record of the testimony of the witness and of all objections made at the time of the examination; and that the witness was given an opportunity to read and correct said deposition and to subscribe the same.

Should the signature of the witness not be affixed to the deposition, the witness shall not have availed himself/herself of the opportunity to sign or the signature has been waived.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal on April 22nd, 2022, at Charleston, Charleston County, South Carolina.

Valerie G. Melkus
Valerie G. Melkus, RPR
Registered Professional
Reporter
My Commission expires
December 19, 2026

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DEPONENT CORRECTION SHEET

I, the undersigned, MICHAEL G. PUTNAM, do
hereby certify that I have read the foregoing
deposition and wish to make the following
clarifications and/or corrections, if any.

PAGE	LINE	CHANGE	REASON
------	------	--------	--------

MICHAEL G. PUTNAM

Date

VGM



AdvancedONE
LEGAL

(866) 715-7770
advancedONE.com



NMLS#104564

200 North Cedar St, Summerville, SC 29483

0843.534.5116 | F843.723.5446 | M843.437.8392

From: Bob Purkerson [<mailto:bpurkerson@hotmail.com>]

Sent: Tuesday, September 01, [REDACTED]

To: Jeffrey C. Fleming

Subject: update

Lyn just brought us up to date on your contact with Michael. Wow. Michael is a sick desperate man and is manipulating you big time. What Michael is doing and saying is not true. We are thankful Zoie is safe and happy with you and is getting the help she needs. You are doing a fine job with her and we thank you for it. We wish we could help.

Thank you ----Bob

Received by email from Bob Purkerson and later forwarded to Michael Putnam

Jeffrey C. Fleming

NO. 1564

203 North Cedar St., Summerville, SC 29483

0 841.534.511615 843.723.5461 M 843.437.8372

Frank Lee Pinkerton (William Jackson Pinkerton, son)

နိဂုံးချုပ်စာ: ၀၁၊ ၂၀၁၅ ၁၁:၃၆ AM

Dr. J. C. Fleming

Subject: update

Just brought up to date on your contact with Michael. Wow, Michael is a sick desperate man and is manipulating you big time. What Michael is doing and saying is not true. We are so thankful Zeke is safe and happy with you and is getting the help he needs. You are doing a fine job with her and we thank you for it. We wish we could help.

၁၂၂၂-၁၂၂၃ ခုနှစ်

Судебная коллегия по уголовным делам Верховного Суда Российской Федерации

CONFIDENTIAL

பெரிய அளவுக்குள்ளேயே இருக்கிறதால், இதுவரை 74 சதவீதமான மூலக்கூறுகள் மட்டும் கிடைத்திருக்கின்றன. இதை மேலும் விரிவாக ஆராய்வதற்காக, இதுவரை கிடைத்திருக்கின்ற மூலக்கூறுகளைப் பற்றி, அந்த மூலக்கூறுகளின் அமைப்பைப் பற்றி, அவற்றின் பண்புகளைப் பற்றி ஆராய்ந்து, அவற்றைப் பற்றித் தகவல் கொடுக்கிறதே இந்த ஆய்வு.

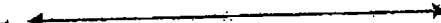
Ex-Royal, Ex-England

• 1986年12月

Subject: Fwd: Spring break 2018

Date: 10/29/2017 8:58:08 AM Eastern Standard Time

From: maples.rob.lyn@gmail.com

To: Cheyenne@aol.com  My sister's email

Cc: MPUTNAM21@aol.com, mputnam2006@gmail.com

Sent from the Internet (Details)

On Oct 28, 2017 5:33 PM, "Rob and Lyn Maples" <maples.rob.lyn@gmail.com>
wrote:

One who is excited to put you down! ~~Anyone who sleeps with their 11 year old~~ Stay
tuned. For your cooments, well that's kind of cute coming from a man with fake hair
and teeth.

Regards

Rob

 COPY

CASE NUMBER: 2020-CP-23-01450

RECORDING OF VOICE MAIL
BY ROBERT H. PURKERSON TO
MICHAEL G. PUTMAN

LEGAL EAGLE
Post Office Box 5682
Greenville, South Carolina 29606
864-467-1373
depos@legaleagleinc.com

1 MALE VOICE:

2 (Inaudible) all over the damn parking lot. You have
3 disgraced my family. You have -- you've dishonored
4 my wife. You've dishonored all of us. And you is
5 just -- you is just trash is what you are. You're
6 just lou -- lousy trash.

7 FEMALE VOICE:

8 This is why we brought cops. We thought he was
9 coming anyway.

10 MALE VOICE:

11 why you bring policemen to my house when you're
12 supposed to pick her up today anyway? We knew that.
13 All you had to do was come by and all you had to do
14 was make your own schedule. Instead you arrive at
15 my house with two damn policemen. You are a lowlife
16 coward, that's what you are. And if you want to
17 defend those words, I'll meet you anywhere anytime.
18 And I can't wait to get my hands on you. Goodbye.
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CERTIFICATE

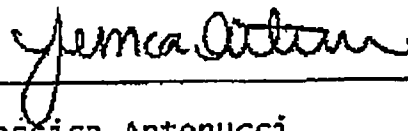
I, the undersigned, Jessica Antonucci, Notary Public in and for the State of South Carolina do hereby certify that:

That the foregoing tape was transcribed at the request of Michael Putnam;

A court reporter was not present at the proceedings and therefore cannot guarantee that every word of testimony could be heard or that the speaking parties are properly identified;

I further certify that I am neither counsel nor solicitor to any of the parties in said suit, nor interested in the event of the cause.

In witness whereof, I have hereunto set my hand and seal this 31st day of May, 2022.



Jessica Antonucci

Notary Public for South Carolina

My Commission expires 7/06/2025



2020CP2301450 : Michael Gene Putnam vs. Wake Christian Academy , defendant, et al

Common Pleas

Case Number 2020CP2301450
Case Subtype Slander/Libel 380

Filed Date 03-06-2020

Status Dismissed

Show/Hide Participants

Plaintiff Michael Gene Putnam et al
Defendant Robin Cary Maples et al
Assigned Judge
File Type Jury

Name	Description	Type	File Date
Michael Gene Putnam	Letter from Clerk of Court to SCCOA	Filing	06-28-2023 09:37:35 AM
Michael Gene Putnam	Plt's Coversheet for Confidential Documents Filed Under Seal	Filing	03-08-2023 03:05:03 PM
Michael Gene Putnam	Plt's Notice/Providing Replacement "Confidential Documents"	Filing	03-08-2023 03:01:26 PM
Michael Gene Putnam	Affidavit/Certificate of Mailing & Emailing	Filing	03-08-2023 02:54:04 PM
Michael Gene Putnam	Plt's/Verified Affidavit/Affirmation as to Replacement Docs	Filing	03-08-2023 02:51:26 PM
Michael Gene Putnam	NEF(10-11-2022 02:23:52 PM) Notice/Other	Filing	10-11-2022 03:54:52 PM
Michael Gene Putnam	Notice of Appeal	Filing	10-11-2022 02:23:52 PM
Robert Henry Purkerson	NEF(09-08-2022 04:47:49 PM) Order/Electronic Form 4	Filing	09-08-2022 04:58:36 PM
Robert Henry Purkerson	Order/Electronic Form 4-Motions Denied	Order	09-08-2022 04:47:49 PM
Michael Gene Putnam	NEF(08-29-2022 04:53:41 PM) Motion/Reconsider	Filing	08-30-2022 08:53:43 AM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Reconsider	Motion	08-29-2022 04:53:41 PM
Robert Henry Purkerson	NEF(08-17-2022 09:06:33 AM) Order/Summary Judgment	Filing	08-17-2022 09:07:01 AM
Robert Henry Purkerson	Order/Summary Judgment	Order	08-17-2022 09:06:33 AM
Michael Gene Putnam	NEF(07-29-2022 09:36:25 AM) Notice/Notice of Appearance	Filing	07-29-2022 09:36:59 AM
Michael Gene Putnam	Notice/Notice of Appearance	Filing	07-29-2022 09:36:25 AM
Michael Gene Putnam	Service/Affidavit And Certificate Of Mailing	Filing	07-26-2022 11:56:43 AM
Michael Gene Putnam	Plt's/Motion/Alter/Reconsider an ORD & Issue Preservation	Motion	07-25-2022 05:01:00 PM
Robert Henry Purkerson	NEF(07-08-2022 01:00:38 PM) Order/Electronic Form 4	Filing	07-08-2022 01:01:08 PM
Robert Henry Purkerson	Order/Electronic Form 4-Def's Motion for S/J Granted	Order	07-08-2022 01:00:38 PM
Michael Gene Putnam	Affidavit and Certificate of Mailing and Emailing	Filing	07-07-2022 04:50:35 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Seal	Motion	07-07-2022 04:45:09 PM
Michael Gene Putnam	Affidavit/Affidavits Of Michael B Oster & William D Johnson	Filing	06-20-2022 02:52:41 PM
Michael Gene Putnam	Memo & Ser In Oppo To Purkerson's Mot For Summary Judgment	Filing	06-17-2022 10:15:37 AM
Michael Gene Putnam	Affidavit In Oppo To Purkerson's Motion For Summary Judgment	Filing	06-17-2022 10:10:49 AM
Robert Henry Purkerson	NEF(06-14-2022 05:13:12 PM) Memo/Memo In Support	Filing	06-15-2022 08:45:18 AM
Robert Henry Purkerson	NEF(06-15-2022 08:19:14 AM) Affidavit/Affidavit of	Filing	06-15-2022 08:42:13 AM
Robert Henry Purkerson	Affidavit/Affidavit of	Filing	06-15-2022 08:19:14 AM
Robert Henry Purkerson	Memo/Memo in Support	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_1	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_2	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_3	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_4	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_5	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_6	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_7	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_8	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_9	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_10	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_11	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_12	Filing	06-14-2022 05:13:12 PM
Robert Henry Purkerson	Memo/Memo in Support-EX_13	Filing	06-14-2022 05:13:12 PM
Case Party Inactive	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	06-01-2022 01:28:32 PM
Douglas A. Churdar	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	06-01-2022 01:28:32 PM
Wesley Jackson Shull	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	06-01-2022 01:28:32 PM
Jeffrey D Wile	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	06-01-2022 01:28:32 PM
Wesley Aaron Vorberger	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	06-01-2022 01:28:32 PM
Robin Cary Maples	NEF(05-25-2022 08:39:09 AM) Order/Electronic Form 4	Filing	05-25-2022 08:39:39 AM
Robin Cary Maples	Order/Electronic Form 4	Order	05-25-2022 08:39:09 AM
Michael Gene Putnam	Affidavit/Certificate of Mailing and Emailing	Filing	05-24-2022 08:42:53 AM
Michael Gene Putnam	Plt/Michael Genn Putnam Motion/Amend	Motion	05-23-2022 04:57:52 PM
Michael Gene Putnam	NEF(05-05-2022 09:00:27 AM) Order/Attorney Fees	Filing	05-05-2022 09:00:50 AM
Michael Gene Putnam	Order/Attorney Fees	Order	05-05-2022 09:00:27 AM
Michael Gene Putnam	NEF(04-20-2022 09:36:08 AM) Order/Electronic Form 4	Filing	04-20-2022 09:36:32 AM
Michael Gene Putnam	Order/Electronic Form 4	Order	04-20-2022 09:36:08 AM

Case Party Inactive	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-19-2022	04:09:33 PM
Douglas A. Churdar	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-19-2022	04:09:33 PM
Wesley Jackson Shull	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-19-2022	04:09:33 PM
Jeffrey D Wile	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-19-2022	04:09:33 PM
Wesley Aaron Vorberger	6/20/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-19-2022	04:09:33 PM
Robert Henry Purkerson	NEF(04-19-2022 09:06:30 AM) Motion/Summary Judgment	Filing	04-19-2022	10:13:06 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Summary Judgment	Motion	04-19-2022	09:06:30 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Summary Judgment-EX_1	Motion	04-19-2022	09:06:30 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Summary Judgment-EX_2	Motion	04-19-2022	09:06:30 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Summary Judgment-EX_3	Motion	04-19-2022	09:06:30 AM
Robin Cary Maples	NEF(04-18-2022 11:39:38 AM) Letter/Letter	Filing	04-18-2022	12:08:33 PM
Robin Cary Maples	Letter/Exhibit for Hearing	Filing	04-18-2022	11:39:38 AM
Robin Cary Maples	Letter/Exhibit for Hearing-EX_1	Filing	04-18-2022	11:39:38 AM
Robin Cary Maples	NEF(04-15-2022 10:44:20 AM) Affidavit/Attorney Fees	Filing	04-18-2022	08:49:30 AM
Robin Cary Maples	Affidavit/Attorney Fees	Filing	04-15-2022	10:44:20 AM
Michael Gene Putnam	Memo/Memo in Opposition	Filing	04-14-2022	04:55:51 PM
Michael Gene Putnam	Affidavit/Certificate Of Mailing & Emailing	Filing	04-07-2022	04:48:00 PM
Michael Gene Putnam	Plt/Michael G Putnam Motion/Amrd Or Correct An Interlocutory	Motion	04-07-2022	04:47:33 PM
Michael Gene Putnam	NEF(04-07-2022 10:14:45 AM) Order/Other	Filing	04-07-2022	10:26:09 AM
Michael Gene Putnam	Order/Other	Order	04-07-2022	10:14:45 AM
Case Party Inactive	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-01-2022	09:40:11 AM
Douglas A. Churdar	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-01-2022	09:40:11 AM
Wesley Jackson Shull	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-01-2022	09:40:11 AM
Jeffrey D Wile	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-01-2022	09:40:11 AM
Wesley Aaron Vorberger	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	04-01-2022	09:40:11 AM
Michael Gene Putnam	Affidavit/Certificate Of Mailing and Emailing	Filing	03-31-2022	04:55:00 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Quash	Motion	03-31-2022	04:53:25 PM
Michael Gene Putnam	NEF(03-24-2022 10:35:05 AM) Order/Electronic Form 4	Filing	03-24-2022	10:45:26 AM
Michael Gene Putnam	Order/Electronic Form 4	Order	03-24-2022	10:35:05 AM
Robin Cary Maples	NEF(03-22-2022 10:29:37 AM) Order/Electronic Form 4	Filing	03-22-2022	10:29:59 AM
Robin Cary Maples	Order/Electronic Form 4	Order	03-22-2022	10:29:37 AM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Alter and/or Amend	Motion	03-02-2022	04:49:35 PM
Michael Gene Putnam	Affidavit/Certificate of Mailing and Emailing	Filing	03-02-2022	10:09:10 AM
Robin Cary Maples	NEF(03-01-2022 03:25:25 PM) Order/Electronic Form 4	Filing	03-01-2022	03:25:48 PM
Robin Cary Maples	Order/Electronic Form 4	Order	03-01-2022	03:25:25 PM
Case Party Inactive	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-25-2022	09:12:09 AM
Douglas A. Churdar	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-25-2022	09:12:09 AM
Wesley Jackson Shull	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-25-2022	09:12:09 AM
Jeffrey D Wile	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-25-2022	09:12:09 AM
Wesley Aaron Vorberger	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-25-2022	09:12:09 AM
Michael Gene Putnam	Service/Affidavit & Certificate of Mailing & Emailing	Filing	02-24-2022	04:58:00 PM
Michael Gene Putnam	Service/Affidavit & Certificate of Mailing & Emailing	Filing	02-24-2022	04:58:00 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Alter and/or Amend	Motion	02-24-2022	04:57:11 PM
Michael Gene Putnam	Service/Certificate Of Delivery of Discovery	Filing	02-24-2022	04:57:00 PM
Case Party Inactive	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2022	10:14:23 AM
Douglas A. Churdar	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2022	10:14:23 AM
Wesley Jackson Shull	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2022	10:14:23 AM
Jeffrey D Wile	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2022	10:14:23 AM
Wesley Aaron Vorberger	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2022	10:14:23 AM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Amend	Motion	02-22-2022	04:51:56 PM
Case Party Inactive	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-18-2022	08:52:51 AM
Douglas A. Churdar	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-18-2022	08:52:51 AM
Wesley Jackson Shull	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-18-2022	08:52:51 AM
Jeffrey D Wile	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-18-2022	08:52:51 AM
Wesley Aaron Vorberger	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-18-2022	08:52:51 AM
Michael Gene Putnam	Affidavit Of Service & Cert of Ser vice By Mail & Emailing	Filing	02-17-2022	04:57:00 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Amend & Exhibits A-E	Motion	02-17-2022	04:56:26 PM
Robin Cary Maples	NEF(02-15-2022 05:00:21 PM) Motion/Set for Hearing	Filing	02-16-2022	09:17:05 AM
Robin Cary Maples	Def/Robin Cary Maples Amended Motion/Attys Fees & Costs	Motion	02-15-2022	05:00:21 PM
Robin Cary Maples	Def/Robin Cary Maples Amended Motion/Attys Fees & Costs-EX_1	Motion	02-15-2022	05:00:21 PM
Case Party Inactive	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-10-2022	09:04:56 AM
Douglas A. Churdar	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-10-2022	09:04:56 AM
Wesley Jackson Shull	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-10-2022	09:04:56 AM
Jeffrey D Wile	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-10-2022	09:04:56 AM
Wesley Aaron Vorberger	4/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	02-10-2022	09:04:56 AM
Robin Cary Maples	NEF(02-09-2022 03:17:29 PM) Motion/Attorney Fees	Filing	02-09-2022	04:28:04 PM

Robin Cary Maples	Def/Robin Cary Maples Motion/Attorney Fees	Motion	02-09-2022	03:17:29 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Attorney Fees-EX_1	Motion	02-09-2022	03:17:29 PM
Robin Cary Maples	NEF(02-09-2022 09:07:42 AM) Order/Electronic Form 4.	Filing	02-09-2022	09:07:57 AM
Robin Cary Maples	Order/Electronic Form 4-Motion Denied	Order	02-09-2022	09:07:42 AM
County Of Greenville Sheriff'S Office	NEF(02-08-2022 03:11:11 PM) Order/Electronic Form 4	Filing	02-08-2022	03:16:42 PM
County Of Greenville Sheriff'S Office	Order/Electronic Form 4-Plt's Motion/Alter or Amend Denied	Order	02-08-2022	03:11:11 PM
Michael Gene Putnam	Plt's Motion/Amend or Correct & Service	Motion	02-04-2022	02:17:38 PM
Robert Henry Purkerson	NEF(02-03-2022 11:28:18 AM) Order/Other	Filing	02-03-2022	11:29:50 AM
Robert Henry Purkerson	Order/Other	Order	02-03-2022	11:28:18 AM
Robin Cary Maples	NEF(02-03-2022 09:03:57 AM) Order/Protective Order	Filing	02-03-2022	09:04:33 AM
Robin Cary Maples	Order/Protective Order	Order	02-03-2022	09:03:57 AM
Robert Henry Purkerson	NEF(02-01-2022 04:31:27 PM) Order/Other	Filing	02-01-2022	04:39:24 PM
Robert Henry Purkerson	Order/Other	Order	02-01-2022	04:31:27 PM
Robin Cary Maples	NEF(01-26-2022 03:23:09 PM) Order/Order Cover Sheet \$25....	Filing	01-26-2022	05:00:18 PM
Robin Cary Maples	Order/Order Cover Sheet \$25.00	Filing	01-26-2022	03:23:09 PM
Robert Henry Purkerson	NEF(01-26-2022 12:30:12 PM) Order/Order Cover Sheet \$25....	Filing	01-26-2022	03:18:37 PM
Robert Henry Purkerson	NEF(01-26-2022 12:26:25 PM) Proposed Order/Other	Filing	01-26-2022	03:06:10 PM
Robert Henry Purkerson	Order/Order Cover Sheet \$25.00	Filing	01-26-2022	12:30:12 PM
Robert Henry Purkerson	Order/Order Cover Sheet \$25.00	Filing	01-26-2022	12:26:25 PM
Michael Gene Putnam	Service/Certificate Of Delivery	Filing	01-21-2022	10:20:11 AM
Michael Gene Putnam	Plt/Michael Gene Putham Motion/Alter and/or Amend	Motion	01-19-2022	04:43:58 PM
Case Party Inactive	3/21/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-11-2022	02:59:39 PM
Douglas A. Churdar	3/21/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-11-2022	02:59:39 PM
Wesley Jackson Shull	3/21/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-11-2022	02:59:39 PM
Jeffrey D Wile	3/21/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-11-2022	02:59:39 PM
Wesley Aaron Vorberger	3/21/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-11-2022	02:59:39 PM
Robert Henry Purkerson	NEF(01-11-2022 02:09:31 PM) Motion/Compel	Filing	01-11-2022	02:28:37 PM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Compel	Motion	01-11-2022	02:09:31 PM
Case Party Inactive	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-06-2022	04:04:29 PM
Douglas A. Churdar	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-06-2022	04:04:29 PM
Wesley Jackson Shull	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-06-2022	04:04:29 PM
Jeffrey D Wile	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-06-2022	04:04:29 PM
Wesley Aaron Vorberger	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	01-06-2022	04:04:29 PM
Michael Gene Putnam	Affidavit/Certificate Of Mailing & Emailing	Filing	01-06-2022	03:40:49 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Amended Supplement In Opposition	Motion	01-06-2022	03:38:12 PM
Robin Cary Maples	NEF(01-03-2022 09:04:03 AM) Order/Electronic Form 4	Filing	01-03-2022	09:04:26 AM
Robin Cary Maples	Order/Electronic Form 4 Denying Plt's Motion to Alter/Amend	Order	01-03-2022	09:04:03 AM
Michael Gene Putnam	Certificate/Certificate of Mailing/Emailing	Filing	12-29-2021	01:35:12 PM
Michael Gene Putnam	Motion/Amend Alter or Reconsider & Exhibits	Motion	12-28-2021	04:51:56 PM
Robin Cary Maples	NEF(12-27-2021 10:57:38 AM) Order/Other	Filing	12-27-2021	10:58:03 AM
Robin Cary Maples	Order/Other-Denying Plt's Motion to Amend, Alter or Reconsid	Order	12-27-2021	10:57:38 AM
Case Party Inactive	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-22-2021	02:26:46 PM
Douglas A. Churdar	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-22-2021	02:26:46 PM
Wesley Jackson Shull	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-22-2021	02:26:46 PM
Jeffrey D Wile	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-22-2021	02:26:46 PM
Wesley Aaron Vorberger	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-22-2021	02:26:46 PM
Michael Gene Putnam	Service/Certificate Of Mailing	Filing	12-22-2021	01:59:24 PM
Michael Gene Putnam	Memo/Memo in Opposition	Filing	12-22-2021	01:59:00 PM
Michael Gene Putnam	Exhibit P Leftout By Plt of Motion/Reconsider Filed 12-20-21	Filing	12-22-2021	01:50:38 PM
Robert Henry Purkerson	NEF(12-22-2021 11:59:11 AM) Motion/Compel	Filing	12-22-2021	01:31:00 PM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Compel	Motion	12-22-2021	11:59:11 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Compel-EX_1	Motion	12-22-2021	11:59:11 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Compel-EX_2	Motion	12-22-2021	11:59:11 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Compel-EX_3	Motion	12-22-2021	11:59:11 AM
Michael Gene Putnam	Affidavit and Certificate of Mailing and Emailing	Filing	12-21-2021	04:36:41 PM
Robin Cary Maples	NEF(12-21-2021 11:40:02 AM) Reply/Other	Filing	12-21-2021	11:49:36 AM
Robin Cary Maples	Reply to Motion to Amend or Alter or Reconsider and Order of	Filing	12-21-2021	11:40:02 AM
Robin Cary Maples	Reply to Motion to Amend or Alter or Reconsider and Order of	Filing	12-21-2021	11:40:02 AM
Michael Gene Putnam	Motion/Amend Alter or Reconsider & Exhibits	Motion	12-20-2021	04:52:53 PM
Robert Henry Purkerson	NEF(12-13-2021 08:38:31 AM) Order/Electronic Form 4	Filing	12-13-2021	08:38:49 AM
Robert Henry Purkerson	Order/Electronic Form 4	Order	12-13-2021	08:38:31 AM
Michael Gene Putnam	Service/Certificate Of Service Certified	Filing	12-10-2021	10:04:20 AM
Michael Gene Putnam	Service/Certificate Of Service Certified	Filing	12-09-2021	10:09:05 AM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	12-09-2021	10:03:42 AM
Case Party Inactive	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-07-2021	02:31:46 PM
Wesley Jackson Shull	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-07-2021	02:31:46 PM

Jeffrey D Wile	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-07-2021	02:31:46 PM
Wesley Aaron Vorberger	1/18/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	12-07-2021	02:31:46 PM
Robin Cary Maples	NEF(12-06-2021 08:38:12 AM) Order/Summary Judgment	Filing	12-06-2021	08:38:24 AM
Robin Cary Maples	Order/Summary Judgment	Order	12-06-2021	08:38:12 AM
Michael Gene Putnam	Filing/Subpoena In A Civil Case	Filing	12-02-2021	04:51:13 PM
Case Party Inactive	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	11-23-2021	08:13:31 AM
Wesley Jackson Shull	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	11-23-2021	08:13:31 AM
Jeffrey D Wile	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	11-23-2021	08:13:31 AM
Wesley Aaron Vorberger	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	11-23-2021	08:13:31 AM
Case Party Inactive	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	11-23-2021	08:13:31 AM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	11-19-2021	02:44:34 PM
Michael Gene Putnam	Certificate of Mailing	Filing	11-18-2021	04:52:27 PM
Michael Gene Putnam	Memo/Memo in Opposition	Filing	11-18-2021	04:51:57 PM
Case Party Inactive	1/10/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	11-16-2021	10:11:24 AM
Wesley Jackson Shull	1/10/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	11-16-2021	10:11:24 AM
Jeffrey D Wile	1/10/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	11-16-2021	10:11:24 AM
Wesley Aaron Vorberger	1/10/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	11-16-2021	10:11:24 AM
Case Party Inactive	1/10/2022_MOTION_Roster/Notice of Motions Roster Publication	Action	11-16-2021	10:11:24 AM
Robin Cary Maples	NEF(11-15-2021 08:07:59 AM) Motion/Quash	Filing	11-15-2021	11:18:03 AM
Robin Cary Maples	Def/Robin Cary Maples Motion/Quash	Motion	11-15-2021	08:07:59 AM
Robin Cary Maples	Def/Robin Cary Maples Motion/Quash-EX_1	Motion	11-15-2021	08:07:59 AM
Robin Cary Maples	Def/Robin Cary Maples Motion/Quash-EX_2	Motion	11-15-2021	08:07:59 AM
Michael Gene Putnam	Plt's Affidavit/Affirmation in Opposition to Def's Motion	Filing	11-12-2021	10:46:43 AM
Michael Gene Putnam	Affidavit/Affidavit and Certificate of Mailing and Emailing	Filing	11-12-2021	10:40:36 AM
Michael Gene Putnam	Plt's Memo/Memo in Opposition to Def's Maples Motion for S/J	Filing	11-12-2021	10:38:33 AM
Michael Gene Putnam	Service/Certificate Of Mailing And Emailing	Filing	11-05-2021	04:17:17 PM
Case Party Inactive	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-03-2021	09:42:24 AM
Wesley Jackson Shull	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-03-2021	09:42:24 AM
Jeffrey D Wile	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-03-2021	09:42:24 AM
Wesley Aaron Vorberger	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-03-2021	09:42:24 AM
Case Party Inactive	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-03-2021	09:42:24 AM
Robin Cary Maples	NEF(11-02-2021 04:03:06 PM) Motion/Summary Judgment	Filing	11-02-2021	04:46:34 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Summary Judgment	Motion	11-02-2021	04:03:06 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Summary Judgment-EX_1	Motion	11-02-2021	04:03:06 PM
Case Party Inactive	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-02-2021	03:31:28 PM
Wesley Jackson Shull	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-02-2021	03:31:28 PM
Jeffrey D Wile	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-02-2021	03:31:28 PM
Wesley Aaron Vorberger	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-02-2021	03:31:28 PM
Case Party Inactive	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	11-02-2021	03:31:28 PM
Michael Gene Putnam	Affidavit/Certificate Of Mailing & Emailing	Filing	11-01-2021	04:58:12 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Compel	Motion	11-01-2021	04:54:33 PM
Michael Gene Putnam	Service/Affidavit & Certificate Of Mailing & Emailing	Filing	10-29-2021	03:13:47 PM
Michael Gene Putnam	Service/Affidavit & Certificate Of Mailing & Emailing	Filing	10-29-2021	03:13:47 PM
Michael Gene Putnam	Rule 11 Affirmation of Attempted Consent of the Parties	Filing	10-28-2021	11:27:40 AM
Case Party Inactive	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	10-11-2021	03:32:45 PM
Wesley Jackson Shull	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	10-11-2021	03:32:45 PM
Jeffrey D Wile	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	10-11-2021	03:32:45 PM
Wesley Aaron Vorberger	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	10-11-2021	03:32:45 PM
Case Party Inactive	12/2/2021_JT_Roster/Notice of Case Roster Publication Sent	Action	10-11-2021	03:32:45 PM
Michael Gene Putnam	Proof of Service	Filing	10-11-2021	02:07:46 PM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	10-05-2021	04:58:23 PM
Michael Gene Putnam	Resp & Oppo And Ser To Maples' Motion To Strike Complaint	Filing	09-10-2021	04:49:00 PM
Michael Gene Putnam	NEF(09-09-2021 11:42:50 AM) Order/Other	Filing	09-09-2021	11:43:17 AM
Michael Gene Putnam	Order/Plt's Motion to Reconsider Denied	Order	09-09-2021	11:42:50 AM
Robin Cary Maples	NEF(09-02-2021 03:14:17 PM) Order/Other	Filing	09-02-2021	03:15:46 PM
Robin Cary Maples	Order/Other	Order	09-02-2021	03:14:17 PM
Case Party Inactive	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	03:58:53 PM
Wesley Jackson Shull	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	03:58:53 PM
Jeffrey D Wile	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	03:58:53 PM
Wesley Aaron Vorberger	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	03:58:53 PM
Case Party Inactive	11/15/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	03:58:53 PM
Case Party Inactive	10/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	11:31:08 AM
Wesley Jackson Shull	10/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	11:31:08 AM
Case Party Inactive	10/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	11:31:08 AM
Jeffrey D Wile	10/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	11:31:08 AM
Wesley Aaron Vorberger	10/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	11:31:08 AM

Case Party Inactive	10/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	08-26-2021	11:31:08 AM
Robin Cary Maples	NEF(08-26-2021 08:49:26 AM) Motion/Strike	Filing	08-26-2021	08:58:16 AM
Robin Cary Maples	Def/Robin Cary Maples Motion/Strike	Motion	08-26-2021	08:49:26 AM
Robin Cary Maples	NEF(08-23-2021 02:16:39 PM) Notice/Notice of Appearance	Filing	08-23-2021	02:17:01 PM
Robin Cary Maples	Notice/Notice of Appearance	Filing	08-23-2021	02:16:39 PM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	08-05-2021	02:36:50 PM
Michael Gene Putnam	Motion/Reconsider and Certificate of Service	Motion	08-04-2021	04:54:57 PM
Michael Gene Putnam	NEF(07-27-2021 10:39:19 AM) Order/Electronic Form 4	Filing	07-27-2021	10:39:47 AM
Michael Gene Putnam	Order/Electronic Form 4	Order	07-27-2021	10:39:19 AM
Michael Gene Putnam	NEF(07-27-2021 10:35:35 AM) Order/Electronic Form 4	Filing	07-27-2021	10:36:13 AM
Michael Gene Putnam	Order/Electronic Form 4	Order	07-27-2021	10:35:35 AM
Michael Gene Putnam	NEF(07-27-2021 09:20:13 AM) Order/Electronic Form 4	Filing	07-27-2021	09:23:13 AM
Michael Gene Putnam	NEF(07-27-2021 09:19:13 AM) Order/Electronic Form 4	Filing	07-27-2021	09:23:05 AM
Michael Gene Putnam	Order/Electronic Form 4 Denying Plt's Motion to Compel	Order	07-27-2021	09:20:13 AM
Michael Gene Putnam	Order/Electronic Form 4 Dismissing Def's Maples Motion S/J	Order	07-27-2021	09:19:13 AM
Michael Gene Putnam	Plt's Affidavit in Opposition to Def Motion for Summ Judg	Filing	07-26-2021	12:01:15 PM
Michael Gene Putnam	Plt's amended opposition to def Motion for summary judgment	Filing	07-23-2021	04:52:57 PM
Michael Gene Putnam	NEF(07-21-2021 02:33:36 PM) Order/Electronic Form 4	Filing	07-21-2021	02:33:55 PM
Michael Gene Putnam	Order/Electronic Form 4	Order	07-21-2021	02:33:36 PM
Michael Gene Putnam	Memo in Opposition to Motion for Summary Judgment	Filing	07-16-2021	04:47:00 PM
Michael Gene Putnam	Affidavit and Certificate of Mailing and Emailing	Filing	07-16-2021	04:06:59 PM
County Of Greenville Sheriff's Office	NEF(07-13-2021 02:33:03 PM) Service/Certificate Of Servi...	Filing	07-13-2021	02:36:59 PM
County Of Greenville Sheriff's Office	Service/Certificate Of Service	Filing	07-13-2021	02:33:03 PM
Michael Gene Putnam	Memo in Response to Plt's Motion for Rule to Show Cause	Filing	07-12-2021	11:37:16 AM
Michael Gene Putnam	Notification of Withdrawal of Subpoena	Filing	07-08-2021	02:16:25 PM
Michael Gene Putnam	Affidavit & Certificate of Mailing	Filing	07-08-2021	02:15:43 PM
Michael Gene Putnam	Service/Certificate Of Service Grvl Sheriffs	Filing	07-01-2021	02:07:22 PM
Michael Gene Putnam	Service/Certificate Of Service	Filing	06-30-2021	04:33:57 PM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-30-2021	10:07:31 AM
Wesley Jackson Shull	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-30-2021	10:07:31 AM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-30-2021	10:07:31 AM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	06-29-2021	09:00:57 AM
Michael Gene Putnam	Service/Affidavit Of Service By Certified Mail	Filing	06-28-2021	04:57:30 PM
Michael Gene Putnam	Service/Affidavit Of Service By Certified Mail	Filing	06-28-2021	04:57:30 PM
Michael Gene Putnam	Service/Certificate Of Mailing	Filing	06-28-2021	04:55:33 PM
Michael Gene Putnam	Plt/Michael G Putnam Motion/Rule to Show Cause	Motion	06-28-2021	04:51:04 PM
Michael Gene Putnam	Service/Certificate Of Service To Each Def	Filing	06-18-2021	04:55:31 PM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-17-2021	04:21:50 PM
Wesley Jackson Shull	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-17-2021	04:21:50 PM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-17-2021	04:21:50 PM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-17-2021	04:21:21 PM
Wesley Jackson Shull	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-17-2021	04:21:21 PM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-17-2021	04:21:21 PM
Michael Gene Putnam	Service/Certificate Of Service To Defs Counsel	Filing	06-15-2021	05:01:00 PM
Michael Gene Putnam	Service/Certificate Of Service To Robin Cary Maples	Filing	06-15-2021	05:01:00 PM
Michael Gene Putnam	Plt/Michael Putnam Motion/Compel Maples & Exhibits A-I	Motion	06-15-2021	05:00:40 PM
Michael Gene Putnam	Plt/Michael Putnam Motion/Compel Purkerson & Exhibits A-C	Motion	06-15-2021	05:00:25 PM
Michael Gene Putnam	Service/Certificate Of Mailing	Filing	06-15-2021	08:43:32 AM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-09-2021	03:17:44 PM
Wesley Jackson Shull	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-09-2021	03:17:44 PM
Case Party Inactive	7/26/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	06-09-2021	03:17:44 PM
Michael Gene Putnam	Plaintiff's Status and Proof of ADR update	Filing	06-09-2021	03:02:04 PM
Robin Cary Maples	Service/Certificate Of Mailing	Filing	06-09-2021	10:25:16 AM
Robin Cary Maples	Def/Robin C Maples Motion/Summary Judgment	Motion	06-09-2021	10:24:22 AM
Michael Gene Putnam	ADR/Proof of ADR	Filing	06-07-2021	02:39:16 PM
Michael Gene Putnam	Service/Certificate Of Service	Filing	06-07-2021	12:03:06 PM
Michael Gene Putnam	Service/Certificate Of Service	Filing	05-27-2021	02:41:57 PM
Robin Cary Maples	NEF(05-24-2021 12:19:05 PM) Order/Electronic Form 4	Filing	05-24-2021	12:19:17 PM
Robin Cary Maples	Order/Electronic Form 4	Order	05-24-2021	12:19:05 PM
Michael Gene Putnam	Plaintiff Michael Gene Putnam Motion/Reconsider And Service	Motion	05-18-2021	04:53:24 PM
Case Party Inactive	7/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	05-17-2021	05:28:46 PM
Wesley Jackson Shull	7/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	05-17-2021	05:28:46 PM
Case Party Inactive	7/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	05-17-2021	05:28:46 PM
Robin Cary Maples	NEF(05-17-2021 01:32:44 PM) Order/Electronic Form 4	Filing	05-17-2021	01:36:35 PM
Robin Cary Maples	Order/Electronic Form 4 Ruling on Multiple Motions	Order	05-17-2021	01:32:44 PM
Michael Gene Putnam	Letter to Judge Gravely	Filing	05-17-2021	12:37:59 PM

Michael Gene Putnam	Affidavit/Affidavit of Michael Gene Putnam and Cert of Mail	Filing	05-17-2021	12:36:20 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	05-14-2021	10:25:14 AM
Robin Cary Maples	Def/Robin Cary Maples Motion/Quash	Motion	05-14-2021	10:24:33 AM
Michael Gene Putnam	Affidavit/Affidavit and certificate of mailing & emailing	Filing	05-10-2021	04:57:32 PM
Michael Gene Putnam	Affidavit/Affidavit and Certificate of Mailing	Filing	05-10-2021	04:56:41 PM
Robin Cary Maples	Affidavit/Affidavit of Robin Maples Motion for Sanctions	Filing	05-03-2021	01:18:50 PM
Robin Cary Maples	Def Robin Maples' Answers to Plt's Request for Production	Filing	05-03-2021	01:17:51 PM
Robin Cary Maples	Def Robin Maples' Amended Answers to Plt's Interrogatories	Filing	05-03-2021	01:17:02 PM
Michael Gene Putnam	NEF(04-27-2021 03:15:58 PM) Order/Electronic Form 4	Filing	04-27-2021	03:17:08 PM
Michael Gene Putnam	Order/Electronic Form 4	Order	04-27-2021	03:15:58 PM
Michael Gene Putnam	Service/Certificate Of Mailing of Subpoena to Def Maples	Filing	04-23-2021	01:38:44 PM
Case Party Inactive	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-21-2021	10:30:01 AM
Wesley Jackson Shull	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-21-2021	10:30:01 AM
Case Party Inactive	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-21-2021	10:30:01 AM
Case Party Inactive	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-21-2021	10:30:01 AM
Wesley Jackson Shull	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-21-2021	10:28:03 AM
Case Party Inactive	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-21-2021	10:28:03 AM
Robert Henry Purkerson	Service/Certificate Of Service	Filing	04-20-2021	03:52:23 PM
Michael Gene Putnam	Certificate Of Service to Robin C Maples	Filing	04-20-2021	11:45:14 AM
Michael Gene Putnam	Certificate Of Service to Robin C Maples	Filing	04-20-2021	11:45:14 AM
Michael Gene Putnam	Certificate Of Service to Robert H Purkerson	Filing	04-20-2021	11:44:26 AM
Michael Gene Putnam	Service/Certificate Of Service	Filing	04-20-2021	11:39:26 AM
Robert Henry Purkerson	NEF(04-19-2021 05:09:04 PM) Service/Certificate Of Servi...	Filing	04-20-2021	09:09:30 AM
Robert Henry Purkerson	NEF(04-19-2021 04:56:48 PM) Memo/Memo in Support	Filing	04-20-2021	08:31:01 AM
Michael Gene Putnam	Affidavit/Affidavit of Plaintiff	Filing	04-19-2021	04:59:00 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion Opposition Summary Judgment	Motion	04-19-2021	04:58:46 PM
Robert Henry Purkerson	Memo/Memo in Support of Motion for Summary Judgment	Filing	04-19-2021	04:56:48 PM
Robert Henry Purkerson	Memo/Memo in Support of Motion for Summary Judgment-EX_1	Filing	04-19-2021	04:56:48 PM
Robert Henry Purkerson	Memo/Memo in Support of Motion for Summary Judgment-EX_2	Filing	04-19-2021	04:56:48 PM
Robert Henry Purkerson	Memo/Memo in Support of Motion for Summary Judgment-EX_3	Filing	04-19-2021	04:56:48 PM
Robert Henry Purkerson	Memo/Memo in Support of Motion for Summary Judgment-EX_4	Filing	04-19-2021	04:56:48 PM
Robert Henry Purkerson	Memo/Memo in Support of Motion for Summary Judgment-EX_5	Filing	04-19-2021	04:56:48 PM
Robert Henry Purkerson	Memo/Memo in Support of Motion for Summary Judgment-EX_6	Filing	04-19-2021	04:56:48 PM
Case Party Inactive	4/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-15-2021	03:42:33 PM
Wesley Jackson Shull	4/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-15-2021	03:42:33 PM
Case Party Inactive	4/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-15-2021	03:42:33 PM
Robert Henry Purkerson	NEF(04-14-2021 12:13:56 PM) Service/Certificate Of Servi...	Filing	04-14-2021	03:02:31 PM
Robert Henry Purkerson	Service/Certificate Of Service	Filing	04-14-2021	12:13:56 PM
Case Party Inactive	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-13-2021	03:18:22 PM
Wesley Jackson Shull	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-13-2021	03:18:22 PM
Case Party Inactive	5/11/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-13-2021	03:18:22 PM
Robert Henry Purkerson	NEF(04-13-2021 07:32:18 AM) Motion/Summary Judgment	Filing	04-13-2021	08:45:27 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Summary Judgment	Motion	04-13-2021	07:32:18 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	04-12-2021	03:16:41 PM
Robin Cary Maples	Service/Affidavit Of Service	Filing	04-12-2021	03:13:00 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Supporting Memo For Sanctions	Motion	04-12-2021	03:10:26 PM
Michael Gene Putnam	NEF(04-12-2021 12:44:22 PM) Order/Electronic Form 4	Filing	04-12-2021	12:44:39 PM
Michael Gene Putnam	Order/Electronic Form 4	Order	04-12-2021	12:44:22 PM
Michael Gene Putnam	NEF(04-12-2021 12:42:25 PM) Order/Electronic Form 4	Filing	04-12-2021	12:42:37 PM
Michael Gene Putnam	Order/Electronic Form 4	Order	04-12-2021	12:42:25 PM
Michael Gene Putnam	NEF(04-12-2021 12:33:51 PM) Order/Electronic Form 4	Filing	04-12-2021	12:34:11 PM
Michael Gene Putnam	Order/Electronic Form 4	Order	04-12-2021	12:33:51 PM
Case Party Inactive	4/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-07-2021	04:16:59 PM
Case Party Inactive	4/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-07-2021	04:15:01 PM
Wesley Jackson Shull	4/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-07-2021	04:15:01 PM
Case Party Inactive	4/19/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	04-07-2021	04:15:01 PM
Robin Cary Maples	Affidavit/Affidavit of Robin C Maples	Filing	04-07-2021	01:55:49 PM
Robin Cary Maples	Affidavit/Affidavit of Robin C Maples	Filing	04-07-2021	01:55:49 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Summary Judgment	Motion	04-07-2021	01:54:43 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Summary Judgment	Motion	04-07-2021	01:54:43 PM
Robert Henry Purkerson	NEF(04-07-2021 11:56:53 AM) Order/Consent Order	Filing	04-07-2021	11:57:09 AM
Robert Henry Purkerson	Order/Consent Order Substitute Counsel	Order	04-07-2021	11:56:53 AM
Robin Cary Maples	NEF(04-07-2021 10:23:24 AM) Order/Consent Order	Filing	04-07-2021	10:26:19 AM
Robin Cary Maples	Order/Consent Order Relieving Counsel	Order	04-07-2021	10:23:24 AM
Robert Henry Purkerson	NEF(04-06-2021 10:47:31 AM) Proposed Order/Consent Order	Filing	04-06-2021	11:42:10 AM
Robert Henry Purkerson	Order/Order Cover Sheet \$25.00	Filing	04-06-2021	10:47:31 AM

Robin Cary Maples	NEF(04-05-2021 04:15:36 PM) Proposed Order/Consent Order	Filing	04-06-2021	08:06:07 AM
Robin Cary Maples	Order/Order Cover Sheet \$25.00	Filing	04-05-2021	04:15:36 PM
Robin Cary Maples	NEF(04-05-2021 10:09:24 AM) Filing/Other	Filing	04-05-2021	11:29:39 AM
Robin Cary Maples	Filing/Other	Filing	04-05-2021	10:09:24 AM
Robin Cary Maples	Filing/Other	Filing	04-05-2021	10:09:24 AM
Robin Cary Maples	NEF(03-25-2021 10:59:09 AM) Service/Certificate Of Servi...	Filing	03-25-2021	11:03:53 AM
Robin Cary Maples	Service/Certificate Of Service to Michael Putnam	Filing	03-25-2021	10:59:09 AM
Robin Cary Maples	NEF(03-23-2021 01:00:23 PM) Order/Other	Filing	03-23-2021	01:00:37 PM
Robin Cary Maples	Order/Other	Order	03-23-2021	01:00:23 PM
Robert Henry Purkerson	NEF(03-11-2021 02:00:45 PM) Response	Filing	03-11-2021	02:15:31 PM
Robert Henry Purkerson	Response To Plaintiff's Status And Proof Of ADR	Filing	03-11-2021	02:00:00 PM
Robin Cary Maples	NEF(03-05-2021 10:22:30 AM) Service/Certificate Of Servi...	Filing	03-05-2021	11:10:28 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	03-05-2021	10:22:30 AM
Michael Gene Putnam	Filing/Status of ADR from Plt Putnam	Filing	03-04-2021	03:56:03 PM
Michael Gene Putnam	ADR/Notice of ADR	Action	03-03-2021	04:19:33 PM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-26-2021	10:13:52 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-26-2021	10:13:33 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-26-2021	10:13:10 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-26-2021	10:12:55 AM
Michael Gene Putnam	Motion/Putnam's Motion In Oppo To Motion To Reconsider	Motion	02-25-2021	04:00:48 PM
Robin Cary Maples	NEF(02-24-2021 03:30:20 PM) Service/Certificate Of Servi...	Filing	02-24-2021	03:57:55 PM
Michael Gene Putnam	Service/Affidavit Of Mailing And Emailing	Filing	02-24-2021	03:36:04 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	02-24-2021	03:30:20 PM
Robin Cary Maples	Notice/Notice of Hearing and Service	Filing	02-24-2021	03:30:20 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	02-24-2021	03:30:20 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	02-24-2021	03:30:20 PM
Robin Cary Maples	NEF(02-24-2021 11:56:43 AM) Service/Certificate Of Servi...	Filing	02-24-2021	12:34:07 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	02-24-2021	11:56:43 AM
Robin Cary Maples	NEF(02-23-2021 07:23:07 PM) Motion/Reconsider	Filing	02-24-2021	09:42:39 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-24-2021	09:03:48 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-24-2021	09:03:33 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-24-2021	09:02:58 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-24-2021	09:02:58 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-24-2021	09:02:58 AM
Wesley Jackson Shull	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-24-2021	09:02:58 AM
Robin Cary Maples	Motion/Reconsider	Motion	02-23-2021	07:23:07 PM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2021	10:04:57 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2021	10:04:57 AM
Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2021	10:04:57 AM
Wesley Jackson Shull	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2021	10:04:57 AM
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Case Party Inactive	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2021	10:04:04 AM
Wesley Jackson Shull	4/5/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	02-23-2021	10:04:04 AM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	02-22-2021	03:04:06 PM
Robin Cary Maples	NEF(02-22-2021 02:06:29 PM) Service/Certificate Of Servi...	Filing	02-22-2021	02:45:22 PM
Michael Gene Putnam	NEF(02-22-2021 02:34:54 PM) Order/Form 4	Filing	02-22-2021	02:35:10 PM
Michael Gene Putnam	Order/Form 4	Order	02-22-2021	02:34:54 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	02-22-2021	02:06:29 PM
Michael Gene Putnam	Motion/Compel	Motion	02-19-2021	04:58:32 PM
Robin Cary Maples	NEF(02-19-2021 03:43:57 PM) Motion/Other	Filing	02-19-2021	04:31:07 PM
Robin Cary Maples	Motion/Other	Motion	02-19-2021	03:43:57 PM
Michael Gene Putnam	Motion/Compel	Motion	01-22-2021	12:09:00 PM
Robert Henry Purkerson	NEF(01-22-2021 06:46:15 AM) Notice/Notice of Appearance	Filing	01-22-2021	06:46:38 AM
Robert Henry Purkerson	Notice/Notice of Appearance	Filing	01-22-2021	06:46:15 AM
Robin Cary Maples	NEF(01-21-2021 11:44:10 AM) Notice/Notice of Hearing and...	Filing	01-21-2021	02:12:32 PM
Robin Cary Maples	NEF(01-21-2021 11:40:57 AM) Service/Certificate Of Servi...	Filing	01-21-2021	12:27:56 PM
Robin Cary Maples	Notice/Notice of Hearing and Service	Filing	01-21-2021	11:44:10 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	01-21-2021	11:40:57 AM
Robin Cary Maples	NEF(01-20-2021 03:29:18 PM) Motion/Compel	Filing	01-20-2021	04:36:47 PM
Robin Cary Maples	Def/Robin Cary Maples Amended Motion/Compel	Motion	01-20-2021	03:29:18 PM
Robin Cary Maples	Def/Robin Cary Maples Amended Motion/Compel-EX_1	Motion	01-20-2021	03:29:18 PM
Robin Cary Maples	Def/Robin Cary Maples Amended Motion/Compel-EX_2	Motion	01-20-2021	03:29:18 PM
Michael Gene Putnam	Bench Order	Order	01-13-2021	09:07:33 AM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	01-07-2021	04:29:41 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	01-07-2021	04:29:41 PM

Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	01-07-2021	04:29:41 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	01-07-2021	04:29:41 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	01-07-2021	04:29:41 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	01-07-2021	04:29:41 PM
Michael Gene Putnam	Service/Affidavit Of Mailing	Filing	12-09-2020	04:35:54 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Quash	Motion	12-09-2020	04:23:49 PM
Robin Cary Maples	NEF(12-07-2020 01:53:00 PM) Service/Certificate Of Servi...	Filing	12-07-2020	03:28:12 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	12-07-2020	01:53:00 PM
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Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	12-07-2020	01:49:58 PM
Robin Cary Maples	NEF(12-07-2020 10:40:42 AM) Service/Certificate Of Servi...	Filing	12-07-2020	12:34:05 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	12-07-2020	10:40:42 AM
Robin Cary Maples	Notice/Notice of Hearing and Service	Filing	12-07-2020	10:40:42 AM
Michael Gene Putnam	Service/Affidavit Of Mailing	Filing	12-07-2020	08:59:15 AM
Michael Gene Putnam	Verification To Answers To Punkerson's Interrogatories	Filing	12-07-2020	08:57:07 AM
Michael Gene Putnam	NEF(12-03-2020 04:19:33 PM) ADR/Notice of ADR	Filing	12-03-2020	04:19:43 PM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	12-03-2020	01:05:29 PM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	12-03-2020	01:05:29 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	12-02-2020	12:15:21 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	12-02-2020	12:15:21 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	12-02-2020	12:15:21 PM
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Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	12-02-2020	12:13:54 PM
Case Party Inactive	2/1/2021_MOTION_Roster/Notice of Motions Roster Publication	Action	12-02-2020	12:13:54 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Dismiss Defs Motion To Compel	Motion	12-01-2020	04:39:14 PM
Michael Gene Putnam	Verification	Filing	11-30-2020	04:31:45 PM
Robin Cary Maples	NEF(11-30-2020 12:07:01 PM) Motion/Compel	Filing	11-30-2020	01:58:53 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Compel	Motion	11-30-2020	12:07:01 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Compel-EX_1	Motion	11-30-2020	12:07:01 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Compel-EX_2	Motion	11-30-2020	12:07:01 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Compel-EX_3	Motion	11-30-2020	12:07:01 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Compel-EX_4	Motion	11-30-2020	12:07:01 PM
Michael Gene Putnam	Notice/Withdrawal of Motion to Compel	Filing	11-19-2020	11:47:57 AM
Case Party Inactive	11/30/2020_MOTION_Roster/Notice of Motions Roster Publicatio	Action	11-19-2020	10:58:12 AM
Case Party Inactive	11/30/2020_MOTION_Roster/Notice of Motions Roster Publicatio	Action	11-19-2020	10:57:23 AM
Case Party Inactive	11/30/2020_MOTION_Roster/Notice of Motions Roster Publicatio	Action	11-19-2020	10:57:23 AM
Case Party Inactive	11/30/2020_MOTION_Roster/Notice of Motions Roster Publicatio	Action	11-19-2020	10:57:23 AM
Robin Cary Maples	NEF(11-16-2020 10:16:08 AM) Service/Certificate Of Servi...	Filing	11-16-2020	11:26:11 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	11-16-2020	10:16:08 AM
Robert Henry Purkerson	Service/Certificate Of Service	Filing	11-16-2020	10:16:08 AM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Compel	Motion	11-13-2020	01:39:28 PM
Michael Gene Putnam	ADR/Alternative Dispute Resolution (Workflow)	Action	10-02-2020	03:39:40 PM
Robin Cary Maples	NEF(10-01-2020 11:01:21 AM) Notice/Notice of Hearing and...	Filing	10-01-2020	11:20:56 AM
Robin Cary Maples	Notice/Notice of Hearing and Service	Filing	10-01-2020	11:01:21 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	10-01-2020	11:01:21 AM
Case Party Inactive	11/30/2020_MOTION_Roster/Notice of Motions Roster Publicatio	Action	09-28-2020	04:21:33 PM
Case Party Inactive	11/30/2020_MOTION_Roster/Notice of Motions Roster Publicatio	Action	09-28-2020	04:21:33 PM
Case Party Inactive	11/30/2020_MOTION_Roster/Notice of Motions Roster Publicatio	Action	09-28-2020	04:21:33 PM
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Robin Cary Maples	Service/Certificate Of Service	Filing	09-25-2020	10:58:35 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	09-25-2020	10:58:35 AM
Robert Henry Purkerson	Service/Certificate Of Service	Filing	09-25-2020	10:58:35 AM
Robin Cary Maples	NEF(09-24-2020 04:37:29 PM) Motion/Quash	Filing	09-25-2020	08:15:19 AM
Robin Cary Maples	Def/Robin Cary Maples Motion/Quash	Motion	09-24-2020	04:37:29 PM
Michael Gene Putnam	Affidavit/Affidavit of Mailing	Filing	09-18-2020	03:30:12 PM
Robin Cary Maples	NEF(09-09-2020 09:23:51 AM) Service/Certificate Of Servi...	Filing	09-09-2020	09:56:18 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	09-09-2020	09:23:51 AM
Robert Henry Purkerson	Service/Certificate Of Service	Filing	09-09-2020	09:23:51 AM
Michael Gene Putnam	Service/Affidavit Of Service (Discovery)	Filing	08-28-2020	02:36:46 PM
Michael Gene Putnam	Service/Affidavit Of Service (Discovery)	Filing	08-28-2020	02:36:46 PM
Michael Gene Putnam	Service/Certificate Of Mailing	Filing	08-11-2020	09:57:07 AM
Michael Gene Putnam	Reply/Reply To Robin Cary Maples' Answer & Counterclaim	Filing	08-11-2020	09:42:46 AM
Michael Gene Putnam	Reply/Reply To Purkerson's Answer & Counterclaim	Filing	08-11-2020	08:44:06 AM
Michael Gene Putnam	Service/Certificate Of Mailing	Filing	07-24-2020	04:10:01 PM
Michael Gene Putnam	Plt/Michael Gene Putnam Motion/Leave to Amend	Motion	07-24-2020	04:09:06 PM

Robin Cary Maples	NEF(07-09-2020 02:31:18 PM) Answer/Answer To Amended Com...	Filing	07-09-2020	03:33:25 PM
Robin Cary Maples	Answer/Answer To Amended Complaint	Filing	07-09-2020	02:31:18 PM
Robert Henry Purkerson	Answer/Answer To Amended Complaint	Filing	07-09-2020	02:31:18 PM
Case Party Inactive	NEF(07-06-2020 12:31:57 PM) Order/Other	Filing	07-06-2020	12:32:09 PM
Case Party Inactive	Order/Other-Dismiss Parties	Order	07-06-2020	12:31:57 PM
Michael Gene Putnam	Certificate of Mailing	Filing	06-26-2020	04:53:12 PM
Case Party Inactive	NEF(06-26-2020 12:52:29 PM) Order/Dismissal	Filing	06-26-2020	12:52:38 PM
Case Party Inactive	Order/Dismissal-as to Def Kormylo	Order	06-26-2020	12:52:29 PM
Robin Cary Maples	NEF(06-26-2020 10:32:21 AM) Service/Certificate Of Servi...	Filing	06-26-2020	10:53:11 AM
Robin Cary Maples	Service/Certificate Of Service	Filing	06-26-2020	10:32:21 AM
Case Party Inactive	NEF(06-25-2020 05:40:10 PM) Order/Order Cover Sheet \$25....	Filing	06-26-2020	09:07:13 AM
Case Party Inactive	Order/Order Cover Sheet \$25.00	Filing	06-25-2020	05:40:10 PM
Michael Gene Putnam	NEF(06-25-2020 02:35:52 PM) Order/Electronic Form 4	Filing	06-25-2020	02:36:02 PM
Michael Gene Putnam	Order/Electronic Form 4/Denying Defs Motions to Dismiss	Order	06-25-2020	02:35:52 PM
Michael Gene Putnam	Plt's Pre-Hearing Brief as to Def Purkerson's Motion/Dismiss	Filing	06-24-2020	04:57:50 PM
Michael Gene Putnam	Plt's Pre-Hearing Brief as to School Defs Motion/Dismiss	Filing	06-24-2020	04:57:32 PM
Michael Gene Putnam	Plt's Pre-Hearing Brief as to Def Maples' Motion/Dismiss	Filing	06-24-2020	04:56:30 PM
Michael Gene Putnam	Plt's Pre-Hearing Brief as to Def Kormylo's Motion/Dismiss	Filing	06-24-2020	04:55:41 PM
Case Party Inactive	NEF(06-22-2020 02:48:30 PM) Memo/Memo in Support	Filing	06-22-2020	03:08:04 PM
Case Party Inactive	NEF(06-22-2020 02:49:55 PM) Memo/Memo in Support	Filing	06-22-2020	03:06:40 PM
Case Party Inactive	Memo/Memo in Support of Def Kormylo's Motion to Dismiss	Filing	06-22-2020	02:49:55 PM
Case Party Inactive	Memo/Memo in Support of Def Kormylo's Motion to Dismiss-EX_1	Filing	06-22-2020	02:49:55 PM
Case Party Inactive	Memo in Support of Def Kormylo's Motion/Relief From Entry De	Filing	06-22-2020	02:48:30 PM
Robert Henry Purkerson	NEF(06-22-2020 12:51:48 PM) Service/Certificate Of Servi...	Filing	06-22-2020	01:01:30 PM
Robin Cary Maples	NEF(06-22-2020 12:50:06 PM) Service/Certificate Of Servi...	Filing	06-22-2020	01:01:09 PM
Robert Henry Purkerson	Service/Certificate Of Service	Filing	06-22-2020	12:51:48 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	06-22-2020	12:50:06 PM
Robert Henry Purkerson	NEF(06-22-2020 12:05:21 PM) Memo/Memo in Support	Filing	06-22-2020	12:12:36 PM
Robert Henry Purkerson	Memo/Memo in Support	Filing	06-22-2020	12:05:21 PM
Robin Cary Maples	NEF(06-22-2020 10:57:30 AM) Memo/Memo in Support	Filing	06-22-2020	11:45:05 AM
Robin Cary Maples	Memo/Memo in Support	Filing	06-22-2020	10:57:30 AM
Case Party Inactive	NEF(06-19-2020 01:38:23 PM) Memo/Memo in Support	Filing	06-19-2020	02:11:00 PM
Case Party Inactive	Memo/Memo in Support of Motion to Dismiss	Filing	06-19-2020	01:38:23 PM
Case Party Inactive	Memo/Memo in Support of Motion to Dismiss-EX_1	Filing	06-19-2020	01:38:23 PM
Robin Cary Maples	NEF(06-18-2020 10:57:41 AM) Motion/Dismiss	Filing	06-18-2020	11:20:42 AM
Robin Cary Maples	Def/Robin Cary Maples Amended Motion/Dismiss & Exhibits A-B	Motion	06-18-2020	10:57:41 AM
Robin Cary Maples	Service/Certificate Of Mailing	Filing	06-18-2020	10:57:41 AM
Michael Gene Putnam	Memo in Response & In Opposition to Def Maples' Motion to Di	Filing	06-12-2020	10:12:47 AM
Michael Gene Putnam	Memo in Opposition to Def's Motion/Set Aside Default & Servi	Filing	06-04-2020	12:00:27 PM
Michael Gene Putnam	Response & Opposition To Motion To Dismiss To Rule 12(b)(6)	Filing	06-02-2020	05:03:40 PM
Michael Gene Putnam	Service/Certificate Of Service	Filing	06-02-2020	04:57:11 PM
Michael Gene Putnam	Notice/Notice of Hearing and Service	Filing	06-02-2020	08:35:39 AM
Case Party Inactive	NEF(05-28-2020 07:05:41 PM) Notice/Notice of Hearing and...	Filing	05-29-2020	08:41:12 AM
Case Party Inactive	Notice/Notice of Hearing and Service	Filing	05-28-2020	07:05:41 PM
Case Party Inactive	Service/Certificate Of Service	Filing	05-28-2020	07:05:41 PM
Robin Cary Maples	NEF(05-28-2020 03:13:05 PM) Service/Certificate Of Servi...	Filing	05-28-2020	03:33:58 PM
Robin Cary Maples	Service/Certificate Of Service	Filing	05-28-2020	03:13:05 PM
Case Party Inactive	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	04:03:37 PM
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Case Party Inactive	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	04:03:37 PM
Douglas A. Churdar	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	04:03:37 PM
Case Party Inactive	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	04:03:37 PM
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Case Party Inactive	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	03:57:34 PM
Douglas A. Churdar	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	03:57:34 PM
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Case Party Inactive	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	03:56:47 PM

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Case Party Inactive	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	03:56:47 PM
Douglas A. Churdar	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	03:56:47 PM
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Douglas A. Churdar	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	03:53:41 PM
Case Party Inactive	6/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action	05-27-2020	03:53:41 PM
Case Party Inactive	NEF(05-26-2020 03:08:15 PM) Motion/Set Aside Default	Filing	05-26-2020	03:30:34 PM
Case Party Inactive	Def/Vanessa Hartman Kormylo Motion/Set Aside Default	Motion	05-26-2020	03:08:15 PM
Case Party Inactive	Service/Certificate Of Service	Filing	05-26-2020	03:08:15 PM
Case Party Inactive	NEF(05-21-2020 02:49:29 PM) Motion/Dismiss	Filing	05-21-2020	03:09:19 PM
Case Party Inactive	Plt/Vanessa Hartman Kormylo Motion/Dismiss	Motion	05-21-2020	02:49:29 PM
Case Party Inactive	Service/Certificate Of Service	Filing	05-21-2020	02:49:29 PM
Case Party Inactive	Affidavit/Non Military Service	Filing	05-20-2020	03:22:17 PM
Michael Gene Putnam	Affidavit/Default	Filing	05-20-2020	03:22:05 PM
Michael Gene Putnam	Motion/Entry of Default	Motion	05-20-2020	03:21:54 PM
Michael Gene Putnam	Service/Affidavit Of Service	Filing	05-20-2020	10:07:50 AM
Michael Gene Putnam	Response & Memo In Opposition To Maples' Motion To Dismiss	Filing	05-19-2020	11:53:39 AM
Michael Gene Putnam	Response & Memo In Opposition To Defs' Motion To Dismiss	Filing	05-18-2020	03:10:14 PM
Michael Gene Putnam	Response & Memo In Oppo To Purkerson's Motion To Dismiss	Filing	05-18-2020	11:19:48 AM
Robert Henry Purkerson	NEF(04-29-2020 03:27:15 PM) Service/Certificate Of Maili...	Filing	04-29-2020	03:53:58 PM
Robin Cary Maples	NEF(04-29-2020 03:22:56 PM) Service/Certificate Of Maili...	Filing	04-29-2020	03:52:28 PM
Robert Henry Purkerson	Service/Certificate Of Mailing	Filing	04-29-2020	03:27:15 PM
Robin Cary Maples	Service/Certificate Of Mailing	Filing	04-29-2020	03:22:56 PM
Case Party Inactive	NEF(04-15-2020 10:04:22 AM) Motion/Dismiss	Filing	04-15-2020	10:40:16 AM
Case Party Inactive	Defs/Wake Christian Academy Motion/Dismiss Amended Complaint	Motion	04-15-2020	10:04:22 AM
Michael Gene Putnam	Plt Response To School Defs Motion/Dismiss & Exh 1	Filing	04-13-2020	04:14:00 PM
Michael Gene Putnam	Plt Response To School Defs Motion/Dismiss & Exh 1	Filing	04-13-2020	04:14:00 PM
Michael Gene Putnam	Plt Response To Def RHP Motion/Dismiss & Exh 1	Filing	04-13-2020	04:14:00 PM
Michael Gene Putnam	Plt Response To Def VHK Motion/Dismiss & CoM	Filing	04-13-2020	04:13:00 PM
Michael Gene Putnam	Service/Affidavit Of Service on Vanessa Hartman Kormylo	Filing	04-13-2020	03:58:00 PM
Michael Gene Putnam	Service/Affidavit Of Service on Rober Henry Purkerson	Filing	04-13-2020	03:58:00 PM
Robert Henry Purkerson	NEF(04-10-2020 04:03:25 PM) Motion/Dismiss	Filing	04-13-2020	09:48:04 AM
Robin Cary Maples	NEF(04-10-2020 02:39:09 PM) Motion/Dismiss	Filing	04-13-2020	09:37:51 AM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Dismiss	Motion	04-10-2020	04:03:25 PM
Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Dismiss-EX_1	Motion	04-10-2020	04:03:25 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Dismiss	Motion	04-10-2020	02:39:09 PM
Robin Cary Maples	Def/Robin Cary Maples Motion/Dismiss-EX_1	Motion	04-10-2020	02:39:09 PM
Robin Cary Maples	NEF(04-09-2020 01:18:47 PM) Notice/Notice of Appearance	Filing	04-09-2020	01:19:05 PM
Robin Cary Maples	Notice/Notice of Appearance	Filing	04-09-2020	01:18:47 PM
Michael Gene Putnam	Service/Certificate Of Service	Filing	04-07-2020	11:37:46 AM
Michael Gene Putnam	Verification/Change or amended	Filing	04-07-2020	09:49:44 AM
Robert Henry Purkerson	NEF(04-06-2020 10:34:52 AM) Service/Certificate Of Servi...	Filing	04-06-2020	11:03:59 AM
Robert Henry Purkerson	Service/Certificate Of Service	Filing	04-06-2020	10:34:52 AM

Michael Gene Putnam	Amended/First Amended Complaint	Filing	04-06-2020	10:10:33 AM
Case Party Inactive	NEF(04-03-2020 09:39:40 PM) Motion/Dismiss	Filing	04-06-2020	08:33:22 AM
Case Party Inactive	Def Vanessa Hartman Kormylo, P.A. Motion/Dismiss	Motion	04-03-2020	09:39:40 PM
Case Party Inactive	Service/Certificate Of Service	Filing	04-03-2020	09:39:40 PM
Case Party Inactive	NEF(04-02-2020 05:51:01 PM) Notice/Notice of Appearance	Filing	04-02-2020	05:51:16 PM
Case Party Inactive	Notice/Notice of Appearance	Filing	04-02-2020	05:51:01 PM
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Robert Henry Purkerson	Def/Robert Henry Purkerson Motion/Dismiss	Motion	04-02-2020	10:09:34 AM
Robin Cary Maples	NEF(04-02-2020 10:05:44 AM) Notice/Notice of Appearance	Filing	04-02-2020	10:05:58 AM
Robin Cary Maples	Notice/Notice of Appearance	Filing	04-02-2020	10:05:44 AM
Case Party Inactive	NEF(03-30-2020 02:48:25 PM) Motion/Dismiss	Filing	03-30-2020	03:29:40 PM
Case Party Inactive	Defs/Wake Christian Academy Motion/Dismiss	Motion	03-30-2020	02:48:25 PM
Case Party Inactive	NEF(03-30-2020 11:12:35 AM) Notice/Notice of Appearance	Filing	03-30-2020	11:12:54 AM
Case Party Inactive	Notice/Notice of Appearance	Filing	03-30-2020	11:12:35 AM
Michael Gene Putnam	Service/Affidavit Of Service S/C On Defendants	Filing	03-24-2020	04:05:44 PM
Case Party Inactive	Notice/Notice of Appearance	Filing	03-23-2020	08:47:19 AM
Michael Gene Putnam	Service/Affidavits Of Service S/C on Purkerson & Kormylo	Filing	03-09-2020	08:39:34 AM
Michael Gene Putnam	Summons & Complaint	Filing	03-06-2020	03:37:56 PM

Disclaimer: The information and documents available here should not be relied upon as an official record of action.
Only filed documents can be viewed. Some documents received in a case may not be available for viewing.
Some documents originating from a lower court, including records and appendices, may not be available for viewing.

Case Information: 2022-001432

Court:	Court of Appeals	Classification:	Appeal - Common Pleas - Other
Short Title:	Michael Gene Putnam v. Robert Henry Purkerson	Case Status:	Final Briefing / Record
	View Full Title		
Consolidated:			
Filed Date:	10/11/2022	Oral Argument Date:	
Disposition Date:		Disposition Type:	
Remittitur Date:			
Lower Court or Tribunal:	Greenville (2020CP2301450)		

- Party Information

Appellate Role	Party Name	Former	Attorney(s)
Appellant	Michael Gene Putnam	N	Thomas Jefferson Goodwyn, Jr. Charles Grant Blackburn
Respondent	Robert Henry Purkerson	N	Wesley Jackson Shull (Former) Langdon Cheves, III Laura C. Tesh

ViewsDisplay: **Event Information**

Filed Date	Event Information	Doc
05/02/2024	Correspondence - Outgoing (Bound Copy Letter)	
04/12/2024	Amended Designation of Matter - Designation of Matter Filed	
04/04/2024	Non-Dispositional Decision - Order to Grant Motion - Strike	
01/03/2024	Motion - Return	
12/21/2023	Initial Brief - No Reply	
12/21/2023	Designation of Matter - Designation of Matter Filed	
12/21/2023	Initial Brief - Respondent	
12/21/2023	Motion - Strike	
12/04/2023	Designation of Matter - Designation of Matter Filed	
12/04/2023	Initial Brief - Appellant (AMENDED)	
11/03/2023	Non-Dispositional Decision - Withdrawn or Ended	
11/03/2023	Correspondence - Outgoing (Setting Deadlines)	
08/11/2023	Motion - "Motion to Withdraw Reply to Proposed Consent Order"	
08/10/2023	Non-Dispositional Decision - Order (Motions to be Relieved as Counsel)	
08/08/2023	Correspondence - Incoming (Appellant's Counsel Withdraws Motion to be Relieved as Counsel)	
08/01/2023	Motion - Reply	
07/24/2023	Correspondence - Incoming (Email from Counsel to Appellant)	
07/24/2023	Correspondence - Incoming (Email from Appellant to Counsel)	
07/21/2023	Motion - Relieve / Withdraw / Substitute as Counsel (Appellant's Counsel)	
07/07/2023	Motion - Relieve / Withdraw / Substitute as Counsel (Respondent's Counsel)	
07/06/2023	Correspondence - Incoming (Email from Wes Shull)	
07/06/2023	Designation of Matter - Designation of Matter Filed (AMENDED)	
07/03/2023	Correspondence - Incoming (Letter from LCT)	
06/22/2023	Correspondence - Incoming (Notice of Transfer Within Firm)	

06/06/2023	Non-Dispositional Decision - Order	
05/25/2023	Non-Dispositional Decision - Extension Granted	
05/25/2023	Designation of Matter - Designation of Matter Filed	
05/25/2023	Motion - Strike (Robert Henry Purkerson)	
05/24/2023	Initial Brief - Respondent	
05/22/2023	Motion - Extension of Time (1st)	
05/22/2023	Motion - Return (Motion to Strike)	
05/08/2023	Motion - Strike	
04/27/2023	Correspondence - Incoming (Letter Regarding New Respondent's Counsel)	
04/24/2023	Designation of Matter - Designation of Matter Filed	
04/24/2023	Initial Brief - Appellant	
04/21/2023	Motion - Amend Notice of Appeal	
04/13/2023	Non-Dispositional Decision - Extension Granted	
04/06/2023	Motion - Extension of Time (3rd)	
03/07/2023	Non-Dispositional Decision - Extension Granted	
03/07/2023	Motion - Extension of Time (2nd) (AIB/DOM)	
01/18/2023	Non-Dispositional Decision - Extension Granted	
01/17/2023	Motion - Extension of Time (1st)	
01/04/2023	Non-Dispositional Decision - Order	
12/19/2022	Transcript Documents - Transcript Delivered - Direct Appeal	
10/31/2022	Motion - Return	
10/27/2022	Motion - Dismiss	
10/13/2022	Correspondence - Outgoing (Notice of Appeal - Initial Letter)	
10/11/2022	Notice of Appeal (Civil) - Initial	

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

G.D. Morgan, Jr., Circuit Court Judge

Perry H. Gravely, Circuit Court Judge

Case No. 2020-CP-23-01450
Appellant Case No.: 2022-001432

RECEIVED

MAY 16 2024

SC Court of Appeals

Michael Gene Putnam.....Appellant,

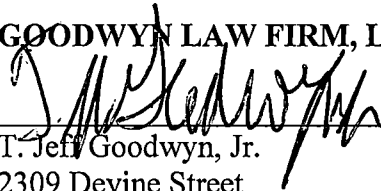
v.

Robert Henry Purkerson.....Respondent.

CERTIFICATE OF COUNSEL

The undersigned hereby certifies that this Record on Appeal, submitted with the consent of all attorneys of record pursuant to Rule 212(b), SCACR, contains all materials proposed to be included by any of the parties and not any other material.

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Attorney for Appellants

Columbia, South Carolina
May 15, 2024