

Exhibit 1

Excerpts from Wife's Responses to Husband's First Set of Interrogatories No. 2-3

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Aug 12 2024

SC Court of Appeals

Respondent's Return to the Court's Order on Petitioner's Motion to Clarify

(August 12, 2024)

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
JUSTIN M. McGEE,)
)
Plaintiff,)
)
-vs-)
)
LINDSAY FOREBACK McGEE,)
)
Defendant.)
_____)

IN THE FAMILY COURT
NINTH JUDICIAL CIRCUIT

**DEFENDANT’S RESPONSES TO
PLAINTIFF’S FIRST SET OF
INTERROGATORIES**

(Re: Motion to Suppress)

CASE NO. 2022-DR-10-3072

**TO: PLAINTIFF, JUSTIN M. McGEE, AND HIS ATTORNEYS, JERRY N. THEOS,
ESQUIRE, MATT ABEE, ESQUIRE, AND MARIE-LOUISE RAMSDALE, ESQUIRE:**

Defendant hereby responds to Plaintiff’s First Set of Interrogatories. In setting forth answers thereto, Defendant does not waive the attorney-client, work product, or any other privilege or immunity from disclosure which may attach to information called for herein or responsive to the interrogatories. Defendant does not concede the relevance or materiality of the interrogatories, and the subject matters to which the interrogatories refer.

1. Identify all persons known or to be witnesses concerning the facts or defenses of the Motion to Suppress, Motion to Supplement Reply, and Motion to Supplement the Record; indicate whether written or recorded statements have been taken from the witnesses; and set forth either a summary sufficient to inform Husband of the important facts known to, or observed by, such witnesses, or provide a copy of any written or recorded statements taken from such witness.

ANSWER:

- a. **Lindsay McGee
664 McCutchen Circle
Charleston, SC 29412**

his sweep and challenges associated with finding these types of covert surveillance equipment.

Defendant reserves the right to supplement her list of witnesses after a review of Plaintiff's responses to discovery.

2. List the Documents or evidence and information submitted to the Family Court or produced in discovery that Wife believes should be suppressed.

ANSWER: Defendant is unable to provide a complete response to this request until discovery is complete and she has a deeper understanding of the audio/video recording devices Plaintiff installed in her home. Notwithstanding, Defendant responds as follows

- a. Plaintiff's Complaint.
- b. All affidavits and exhibits submitted by Plaintiff.
- c. All pleadings, discovery and affidavits submitted in the Keys v. Keys matter.
- d. All affidavits, reports and testimony by John Clayton.

3. List the allegations that Husband has made that Wife believes should be suppressed.

ANSWER: Defendant is unable to provide a complete response to this request until discovery is complete and she has a deeper understanding of the audio/video recording devices Plaintiff installed in her home. Notwithstanding, Defendant responds as follows

- a. All allegations in the complaint and supporting affidavits related to adultery.
- b. All allegations in the complaint and supporting affidavits related to drug use.
- c. All allegations in the complaint and supporting affidavits related to Defendant's parenting.
- d. All allegations contained in the affidavits submitted by Plaintiff.
- e. All allegations contained in the affidavits, reports and testimony by John Clayton.

15. Does Wife know anyone by the name of James or Jimmy Nolan? If Wife's answer to this Interrogatory is yes, identify the individual's full name, address, phone number, alternative email address, and the nature of Wife's relationship with the individual.

ANSWER: No.

16. Does Wife known or have any information as to who created, or is associated with the email address jimmynolan@protonmail.com, or who is responsible for the transmission of the Nolan email to Husband?

ANSWER: No.

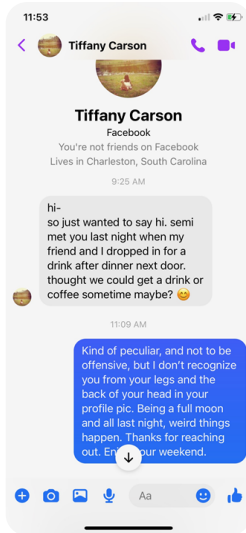
By: 

PETER G. CURRENCE
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ATTORNEYS FOR DEFENDANT

Exhibit 2

Wife's Text Message to Paramour, May 6, 2023

Respondent's Return to the Court's Order on Petitioner's Motion to Clarify
(August 12, 2024)



This is our conversation from this morning

Do you know if the lawyer is calling me Monday? Something's gotta be done about this.

Also, check your location services under your settings on your phone

Oh, and just to clarify, I walked Mimi and Tia to their car last night. Before 10 o'clock. Said the guys next to them made them feel uncomfortable. Nothing shady on anyone's part, but I'm sure that story will get twisted and it'll be something elaborate

5/6/2023 6:53:20 PM

Molly ... yes or no

Drug test wise is the question

Too late

OMG: this is the micro after I texted [redacted]
What are you doing? Oh my God I would like to let you know that that's a thing. Yeah I know we know. Approving is very irritating. Know the menu list you like you. Like your pinky, would you like some hey Siri.L

Yes it shows up

Working. Derby about to start. What time is the show

Delete this Also I'm "dans girl" per 2 introductions

No need to text back. Yay horses. Walking to show now.

Sorry you got labeled. All this deleted