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SC Court of Appeals

EXHIBIT 1

3/13/2025

MARY DOW JACKSON

ELECTRONICALLY FILED - 2025 Jun 12 10:06 AM - KERSHAW - COMMON PLEAS CASE#2024CP2800123

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1 Q: Have you ever given a deposition before?
 2 A: Yes.
 3 Q: How many times have you given a
 4 deposition?
 5 A: Once.
 6 Q: What kind of case was that?
 7 A: In reference to Mr. Ives. That's it.
 8 Q: Even though this is not your first time,
 9 I'm still required to go through several ground
 10 rules per the State court rules, and then I also add
 11 in my own recommendations.
 12 First, while I'm the counsel deposing
 13 you, you need to ask me for any clarifications. If
 14 you answer a question, I'll assume that you
 15 understood it. Now, your lawyer is permitted by the
 16 rules to object to the form of my excellently worded
 17 questions. Even if he does, you still have to
 18 answer. He'll do that by saying object to the form.
 19 The only time you don't answer is when he's jumping
 20 and screaming don't answer. And you'll know when
 21 that happens.
 22 If you need a break, let me know, and
 23 we'll accommodate you. I don't think we'll be here
 24 too terribly long today. I predict about two hours.
 25 During those breaks, however, you're not supposed to

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1 talk about the case or your testimony. And I can
 2 ask you what you talked about even with your lawyers
 3 during breaks in a deposition. So do be mindful of
 4 that.
 5 We have a court reporter who is
 6 transcribing everything that you and I say. So to
 7 keep a clean transcript, let's try to let each other
 8 finish speaking before we jump in. I'll try the
 9 same, and I guarantee I'll make mistakes in that
 10 regard. Also make sure you answer verbally such as
 11 yes or no and not uh-huh, huh-uh, or nods of the
 12 head. Do you have any questions before we get
 13 started?
 14 A: No.
 15 Q: What you did you do to prepare for your
 16 deposition today?
 17 A: Just need to tell the truth.
 18 Q: Okay. Did you review any documents?
 19 A: No.
 20 Q: Tell me about the prior matter you were
 21 deposed in. You said it involved Charles Ives?
 22 A: Yes.
 23 Q: Okay. What kind of case was that?
 24 A: It was just talking about land.
 25 Q: About land?

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1 A: Uh-huh.
 2 MR. PORTER: You have to say yes or no,
 3 dear.
 4 THE WITNESS: Oh.
 5 MR. GLEISSNER: Was that a "yes"?
 6 A: Yes.
 7 MR. GLEISSNER: Thank you.
 8 Q: How long ago was that deposition?
 9 A: 2021.
 10 Q: Where was that deposition?
 11 A: At his lawyer's office, downtown Columbia
 12 Q: Brian Boger?
 13 A: Yes.
 14 Q: What land was at issue in that dispute?
 15 A: He was talking about where his car lot
 16 sit.
 17 Q: Okay. Were multiple lawyers at that
 18 deposition?
 19 A: Maybe two.
 20 Q: And you provided testimony under oath in
 21 that meeting just like you're doing today?
 22 A: Yes.
 23 Q: How long have you known Charles Ives?
 24 A: From there to now, maybe four years.
 25 Q: How did you first meet Charles Ives?

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1 A: At his car lot.
 2 Q: How did that happen?
 3 A: We was just talking.
 4 Q: How did you come to be there?
 5 A: In reference to my late husband.
 6 Q: Did he ask you to come to the car lot?
 7 A: Yes.
 8 Q: Tell me about that. How did he get in
 9 touch with you?
 10 A: A phone call.
 11 Q: How did -- do you know how he got your
 12 number?
 13 A: No.
 14 Q: Okay. How long was the phone call?
 15 A: A couple minutes.
 16 Q: What did he say on the phone call?
 17 A: He just said he would like the meet me,
 18 and that was pretty much it.
 19 Q: Did he say why?
 20 A: In reference to the land where his car lot
 21 sit.
 22 Q: Okay. Well, you say when you got there,
 23 you talked about your late husband?
 24 A: Yes.
 25 Q: Okay. Tell me what you talked about when

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1 you met him at his car lot.
 2 A: He just asked me who my husband was, and I
 3 told him. That was pretty much it.
 4 Q: Did he ask you that on the telephone or at
 5 the car lot?
 6 A: At the car lot.
 7 Q: Okay. What questions did he have for you
 8 about your car lot -- about his car lot?
 9 A: Oh, it was just -- he just said the car
 10 lot sit on the Campbell land. That's it.
 11 Q: How many times have you met with Charles
 12 Ives in person other than that meeting at his car
 13 lot and this deposition or meeting at Brian Boger's
 14 office in approximately 2021?
 15 A: Maybe about three times.
 16 Q: Okay. So there had been three other
 17 occasions where you think you met with Charles Ives?
 18 A: Yes.
 19 Q: Okay. Where have you met with Charles
 20 Ives on those three other occasions?
 21 A: You would always go to the car lot.
 22 Q: Have you ever bought a car from Charles
 23 Ives?
 24 A: No.
 25 Q: So what brought you to the car lot those

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1 other three times?
 2 A: He was just asking different questions.
 3 That's all.
 4 Q: What kind of questions?
 5 A: I don't remember.
 6 Q: What were the questions about?
 7 A: It's just the same questions, pretty much.
 8 Q: Okay.
 9 A: About the car lot.
 10 Q: What about the car lot?
 11 A: Did I know about the Campbell land and
 12 this and that, and I told him no.
 13 Q: Was he trying to see if you could be a
 14 witness for him in his case?
 15 A: I don't know.
 16 Q: The next few questions I ask of everybody
 17 who's deposed. The reason I ask them is because I'd
 18 rather know now if there's any things in your past
 19 than at court. But I know they are embarrassing,
 20 and I do apologize for that. Have you ever been
 21 arrested for a felony?
 22 A: No.
 23 Q: Okay. And other than speeding tickets,
 24 have you been convicted for any misdemeanors in the
 25 last ten years?

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1 A: No.
 2 Q: Have you been involved in any prior legal
 3 cases as a party?
 4 A: Legal cases? No, not really.
 5 Q: Have you ever sued anybody in a lawsuit
 6 other than this case?
 7 A: Probably a minor car accident, and that's
 8 about it.
 9 Q: Have you ever been sued in a lawsuit?
 10 A: No.
 11 Q: What is your current street address?
 12 A: 108 Tilting Rock Drive, Hopkins,
 13 South Carolina 29061.
 14 Q: How long have you lived there?
 15 A: We moved there 2016.
 16 Q: Who over the age of 18, if anybody, lives
 17 there with you?
 18 A: My two daughters and my baby sister.
 19 Q: All right. What are your two daughters'
 20 names?
 21 A: Tyre Channel [ph] Jackson, Melissa
 22 Courtney Jackson.
 23 Q: And what's your sister's name?
 24 A: Joyce Jenette [ph] Dow.
 25 Q: Your date of birth?

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1 A: 8/13/1949.
 2 Q: Do you work anywhere?
 3 A: No.
 4 Q: When's the last time you worked?
 5 A: 2015.
 6 Q: Where did you work?
 7 A: I was working at the school district.
 8 Q: Richland One?
 9 A: Two.
 10 Q: Your two daughters, Tyrese -- am I saying
 11 it right? Tyre?
 12 A: Tyre.
 13 Q: Tyre and Melissa, where do they work?
 14 A: Melissa's a pharmacy tech, and Tyre is
 15 security at Baptist Hospital.
 16 Q: There are two other folks -- or three
 17 other folks in -- strike that.
 18 There are four other folks in the
 19 caption, a Reginald Allen, Bryant Allen, Andre
 20 Allen, and Timothy Johnson. Who are the Allens to
 21 you?
 22 A: My stepsons.
 23 Q: Okay. What about Timothy Johnson?
 24 A: My stepson.
 25 Q: Where are the Allens located? Are they in

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1 Richland County?
 2 A: I think Reginald is in Richland, and Andre
 3 is in Kershaw County. Bryant is in California.
 4 Q: Okay. What does Reginald do? Do you
 5 know?
 6 A: I don't know.
 7 Q: Do you know what Andre does?
 8 A: Not really.
 9 Q: Okay. And do you know what Bryant does in
 10 California?
 11 A: No.
 12 Q: What about Timothy Johnson? Where does he
 13 live?
 14 A: He's in New York.
 15 Q: All right. Do you know what kind of work
 16 he does?
 17 A: He was a prison at the guard -- I mean, a
 18 guard at the prison in New York.
 19 Q: Were you previously married to Gordon
 20 Louis Jackson?
 21 A: Previously.
 22 Q: Were you married to Gordon Louis Jackson?
 23 A: Yes.
 24 Q: What years were you married to Gordon
 25 Louis Jackson?

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1 A: April the 19th, 1974.
 2 Q: Okay. How did you meet Gordon Louis
 3 Jackson?
 4 A: Baseball game.
 5 Q: How long before you were married to him
 6 did y'all meet?
 7 A: It was about a year and a half or more.
 8 Q: So in approximately 1972?
 9 A: Uh-huh.
 10 MR. GLEISSNER: Is that a "yes"?
 11 A: Oh, yes.
 12 Q: Thank you, ma'am.
 13 A: You're welcome.
 14 MR. GLEISSNER: I'm glad I'm serving some
 15 purpose.
 16 THE WITNESS: I need you.
 17 Q: What day did y'all get married?
 18 A: April the 19th, 1974.
 19 Q: How many children did y'all have together?
 20 A: Two.
 21 Q: And that's Tyre and ---
 22 A: Melissa.
 23 Q: --- Melissa?
 24 What kind of work did Gordon Louis
 25 Jackson do?

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1 A: Security.
 2 Q: And Mr. Jackson died in December of 2013?
 3 A: Yes.
 4 Q: I think you mentioned that you have a
 5 stepchild who lives in Kershaw County. Do you have
 6 any other family that lives in Kershaw County?
 7 A: Stepchild?
 8 Q: I thought you said Reginald Allen lives in
 9 Kershaw County?
 10 A: Oh, yes, my stepsons. Yeah.
 11 Q: Do you have any other family in Kershaw
 12 County?
 13 A: Well, in terms of children or just family
 14 Q: Folk who are related to you ---
 15 A: No.
 16 Q: Okay. Do you go church?
 17 A: Yes.
 18 Q: Where do you go to church?
 19 A: Unity Missionary Baptist Church.
 20 Q: Is that in Hopkins?
 21 A: Yes.
 22 Q: Are you a member of any civic
 23 organizations or clubs?
 24 A: No.
 25 Q: Where did you graduate from high school?

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1 A: Bethel High School.
 2 Q: And that was one of the two schools that
 3 merged into Lower Richland; is that right?
 4 A: No. That was in District Two.
 5 Q: Okay.
 6 A: 1967.
 7 Q: What's your highest level of education?
 8 A: High school.
 9 Q: What did you do for your career? I
 10 understand you worked at Richland Two. What kind of
 11 work did you do in your career?
 12 A: Before I went to Richland Two, I worked at
 13 Saw Chain Company.
 14 Q: How is that spelled?
 15 A: It was Saw Chain Company. It ended up
 16 being John Deere.
 17 Q: Okay.
 18 A: Saw Chain Company.
 19 Q: Who do you have your cell phone with,
 20 AT&T, Verizon?
 21 A: AT&T.
 22 Q: Your communications with Charles Ives that
 23 you mentioned, would they have started on your cell
 24 phone, or did he call your home phone?
 25 A: He might have did both. I don't know.

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1 Q: Have you and Charles Ives ever texted?
 2 A: No.
 3 Q: Okay. Did Gordon Louis Jackson, your late
 4 husband, die with or without a will?
 5 A: Without.
 6 Q: I understand the estate was opened in
 7 2023. Is that your understanding?
 8 A: That's sounds about right.
 9 Q: Was there any probate or estate work done
 10 for Gordon back when he died, in 2013, 2014 time
 11 frame? Or was the first time something was done at
 12 the court over his passing in 2023?
 13 A: I went down to the courthouse after he
 14 passed, but they gave me a whole lot of hassle, so I
 15 just stopped.
 16 Q: Okay. Why was the estate opened in 2023,
 17 ten years after Gordon's passing?
 18 A: I guess we opened it because of all the
 19 different talk back and forth. I don't know.
 20 Q: Okay. What do you mean different talk
 21 back and forth?
 22 MR. PORTER: Ms. Jackson, if you -- excuse
 23 me. If your talking about discussions with
 24 your counsel ---
 25 THE WITNESS: Uh-huh.

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1 MR. GLEISSNER: Okay. I would object and
 2 say please don't discuss the discussions that
 3 you had with counsel. If you're talking about
 4 discussion that you had with other people, then
 5 that's okay. I don't have any problem with you
 6 answering those questions. Fair enough?
 7 Fair enough?
 8 MR. PORTER: Yeah. That's a proper
 9 instruction.
 10 MR. GLEISSNER: Okay.
 11 Q: So these -- this talk back and forth that
 12 led you to open his estate, was there talk with
 13 people other than lawyers, or was this conversations
 14 between you and attorneys?
 15 A: Conversations with Mr. Ives and with a
 16 lawyer, I guess.
 17 Q: Did you ever -- these conversations with
 18 Mr. Ives, were lawyers present at those
 19 conversations?
 20 A: Not all. We just chatted a little bit in
 21 his office, and that was pretty much it ---
 22 Q: All right.
 23 A: --- until I did the deposition.
 24 Q: How did you -- did Mr. Ives introduce you
 25 to your lawyers in this case?

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1 A: Yes. When we did the deposition, that's
 2 with the only time I met him.
 3 Q: Your lawyers in this case, so
 4 Mr. Gleissner and Mr. Harling, how did you find
 5 them?
 6 A: I guess through Mr. Ives.
 7 Q: Okay. Did Mr. Ives take you to their
 8 office?
 9 A: No.
 10 Q: Okay. When did you first meet with a
 11 lawyer about matters pertaining to this case?
 12 A: It all was mentioned during the same time
 13 starting in 2023 up until now so ...
 14 Q: Did you meet with a lawyer at the
 15 recommendation of Mr. Ives?
 16 A: Not really.
 17 Q: Okay. Do you understand that you've been
 18 appointed as personal representative of your late
 19 husband's estate, Gordon Louis Jackson?
 20 A: Yes.
 21 Q: Okay. What is your understanding of the
 22 significance of that appointment? Do you understand
 23 what that means, being the personal representative
 24 of the estate?
 25 A: To handle things that's pertaining to my

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1 late husband.
 2 Q: Do you understand that it authorizes you
 3 in some regards to speak on behalf of the estate and
 4 to take certain actions on behalf of the estate?
 5 A: Yes.
 6 Q: Looking at the pleadings, there are some
 7 family members or some step family members of yours
 8 named and your own children. So first off, were
 9 Melissa and Tyre Jackson, your two daughters,
 10 involved in your discussions with Charles Ives or
 11 your decision to pursue a lawsuit in this case?
 12 A: Repeat that, please.
 13 Q: Yeah. I'll break it up too. I'll object
 14 to the form of my question. Were Melissa and Tyre
 15 Jackson, either of them involved in your discussions
 16 with Charles Ives?
 17 A: No. 'Cause they didn't want to go.
 18 Q: Okay. Were either of them involved in
 19 your decision to file a lawsuit in this case?
 20 A: Repeat that, please.
 21 Q: Did you -- who made the decision to file
 22 this lawsuit?
 23 A: I did.
 24 Q: Was any of your other family involved in
 25 that decision?

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1 A: The step children was talking about it.
 2 Q: Okay. Which step children were talking
 3 about it?
 4 A: The four sons.
 5 Q: All four of them were?
 6 A: Yes.
 7 Q: Okay. Any of those four meet with Charles
 8 Ives, to your knowledge?
 9 A: I don't know.
 10 Q: Any of those four join you in any of your
 11 meetings with your lawyers in this case?
 12 A: Yes.
 13 Q: Which four? Which of the four?
 14 A: All four.
 15 Q: Okay. On what basis do you assert that
 16 Gordon Louis Jackson -- actually, let me ask it
 17 differently.
 18 What is your understanding of who
 19 Gordon Louis Jackson's parents were?
 20 A: My understanding?
 21 Q: Yes, ma'am.
 22 A: Because his father said so.
 23 Q: I'm not even getting there yet.
 24 A: Oh.
 25 Q: I'm asking you who his parents were.

Page 22

1 A: Oh.
 2 Q: What is your understanding of who they
 3 were?
 4 A: Viola Jackson-Pope.
 5 Q: And that was his mama; correct?
 6 A: Yes.
 7 Q: All right. Was Viola Jackson-Pope
 8 married?
 9 A: Not at the time Gordon was born, I don't
 10 think so.
 11 Q: Do you keep a copy of Gordon's birth
 12 certificate? Do you have a copy of that?
 13 A: Probably somewhere at home.
 14 Q: Was there anyone listed as father on his
 15 birth certificate; do you know?
 16 A: No.
 17 Q: Okay. What is your understanding of who
 18 Gordon Louis Jackson's dad was?
 19 A: Because Tommy Edward Campbell said so.
 20 Q: I understand that's why you think that.
 21 But you think -- Thomas Edward Campbell? Is that
 22 what you're trying say?
 23 A: Yes.
 24 Q: Okay. All right. And you're referring to
 25 the Thomas Edward Campbell who's been deceased since

Page 23

1 1982?
 2 A: Yes.
 3 Q: Did you know Thomas Edward Campbell?
 4 A: I met him several times.
 5 Q: Okay. And so let me ask the question
 6 you've been trying to answer. On what basis do you
 7 claim that Gordon Louis Jackson is the biological
 8 son of Thomas Edward Campbell?
 9 A: Because Mr. Thomas Edward Campbell said
 10 so.
 11 Q: All right. Anything other than that?
 12 A: No.
 13 Q: All right. To your knowledge, Thomas
 14 Edward Campbell is not listed on Gordon's birth
 15 certificate; correct?
 16 A: Right.
 17 Q: Are there any letters from Thomas Edward
 18 Campbell claiming Gordon Louis Jackson as his child?
 19 A: Not that I've seen.
 20 Q: Do you understand that Thomas Edward
 21 Campbell died without a will?
 22 A: Yes.
 23 Q: So you're not aware of any wills or
 24 testaments by Thomas Edward Campbell that mention
 25 Gordon Louis Jackson; correct?

Page 24

1 A: (No audible response.)
 2 Q: I'll ask it a different way. Are you
 3 aware of any wills or testaments that mention -- by
 4 Thomas Edward Campbell that mention Gordon Louis
 5 Jackson?
 6 A: Not none that I've seen, but he did make
 7 mention of it.
 8 Q: Okay. What do you mean? What did he say
 9 to make mention of it?
 10 A: That he wanted Gordon to come back by
 11 because he must had some paperwork or something,
 12 because we was supposed to go back by that Monday,
 13 but he was killed before we got back by that Monday
 14 so ...
 15 Q: Have you or your family taken any DNA test
 16 to confirm paternity?
 17 A: No.
 18 Q: Are there -- you agree that Gordon Louis
 19 Jackson was not listed at a child of T.E. Campbell
 20 in his obituary?
 21 A: Yes.
 22 Q: Are there any Campbell family obituaries
 23 which mention Gordon Louis Jackson, to your
 24 knowledge?
 25 A: Not that I'm aware of.

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1 Q: Are you aware of any court order or decree
 2 prior to the death of Thomas Edward Campbell that
 3 establish paternity over Gordon Louis Jackson?
 4 A: No.
 5 Q: Are you aware of any written paternity
 6 acknowledgments by Thomas Edward Campbell of Gordon
 7 Louis Jackson?
 8 A: Say that again, please.
 9 Q: Yes, ma'am. Are you aware of any written
 10 paternity acknowledgments by Thomas Edward Campbell
 11 of Gordon Louis Jackson?
 12 A: No.
 13 Q: How many times did you meet Thomas Edward
 14 Campbell?
 15 A: Maybe about four or five.
 16 Q: Okay. Where did you meet Thomas Edward
 17 Campbell those four or five times?
 18 A: At his home.
 19 Q: Okay. And where was that located?
 20 A: I don't remember the exact address, but
 21 his home is down below Highway Pentecostal Church.
 22 Q: How long were those meetings with Thomas
 23 Edward Campbell, those four or five?
 24 A: About maybe about half an hour.
 25 Q: Okay. And what were the purpose of those

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1 meetings?
 2 A: We was just talking in general.
 3 Q: Have -- and your testimony is -- well, let
 4 me ask you. Did Thomas Edward Campbell verbally
 5 acknowledge Gordon Louis Jackson as his child in
 6 those meetings?
 7 A: Yes.
 8 Q: In all four of those meetings?
 9 A: It was always about Gordon.
 10 Q: Sure. But did he state that Gordon was
 11 his child in those meetings?
 12 A: Not every time; no.
 13 Q: Okay. Have any other members of the
 14 Campbell family ever stated that Gordon Louis
 15 Jackson was their relative?
 16 A: Not that I'm aware of.
 17 Q: How many years prior to Thomas Edward
 18 Campbell's death do you think you met Thomas Edward
 19 Campbell?
 20 A: We got married in '74. I saw about --
 21 four or six times, like I said.
 22 Q: And how many years prior to his death do
 23 you think y'all met for the first time?
 24 A: Oh, I don't remember the exact date, year.
 25 Q: Do you think you knew him for a good while

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1 before he was dead, or did you meet him right before
 2 he died?
 3 A: I met him after I married my husband in
 4 '74.
 5 Q: All right. You think you've met him four
 6 to six times between 1974 and 1982?
 7 A: Yeah.
 8 Q: Okay. How early in you and your husband's
 9 relationship did you come to the understanding that
 10 his dad, his biological dad was Thomas Edward
 11 Campbell?
 12 A: From the beginning, pretty much.
 13 Q: Okay. So your husband expressed from the
 14 outset pretty much that his dad was Thomas Edward
 15 Campbell?
 16 A: Yes.
 17 Q: So it was not a mystery to your husband
 18 who his dad was?
 19 A: I ---
 20 Q: He knew his dad was Thomas Edward
 21 Campbell?
 22 A: Yes.
 23 Q: Tell me a little about your husband. What
 24 was his educational background? What was his
 25 highest level of education?

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1 A: High school.
 2 Q: Okay. And he served in the military; is
 3 that correct?
 4 A: Yes.
 5 Q: How many years?
 6 A: Six.
 7 Q: Okay. Was he a smart man?
 8 A: Yes.
 9 Q: Was he outgoing, friendly?
 10 A: Yes.
 11 Q: Was he involved in the church?
 12 A: No.
 13 Q: Okay. Did y'all know any lawyers?
 14 A: No, not really.
 15 Q: Okay. Would you have known how to get
 16 ahold of a lawyer?
 17 A: Yes.
 18 Q: Did y'all know people who knew lawyers?
 19 A: Yes.
 20 Q: Was there a particular lawyer you would
 21 have reached out to in the '70s or early '80s if you
 22 needed something?
 23 A: No.
 24 Q: But you believe you could have found a
 25 lawyer if you needed one?

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1 A: Yes.

2 Q: Do you know if Gordon knew any lawyers?

3 A: I don't know.

4 Q: Did he have any occasion to your knowledge

5 to hire any lawyers in his lifetime?

6 A: I don't know.

7 Q: These children, the Allens and Timothy

8 Johnson, were they produced in prior marriages?

9 A: No.

10 Q: Okay. So Gordon wasn't married prior to

11 you?

12 A: Not that I'm aware of.

13 Q: Do you know if Gordon ever pursued any

14 lawsuits in his life?

15 A: I do not know.

16 Q: Did Gordon ever pursue any legal action to

17 establish that Thomas Edward Campbell was his father

18 prior to his death?

19 A: Not that I'm aware of; no.

20 Q: And that's a poorly worded question. So

21 first off, did Gordon Louis Jackson pursue any legal

22 action to establish that Thomas Edward Campbell was

23 his father prior to Thomas Edward Campbell's death

24 in 1982?

25 A: The not that I'm aware of.

Page 30

1 Q: Did Gordon Louis Jackson pursue any legal

2 action to establish that Thomas Edward Campbell was

3 his father prior to Gordon Louis Jackson's death in

4 2013?

5 A: No.

6 Q: Do you have knowledge of anyone in the

7 Campbell family other than Thomas Edward Campbell

8 acknowledging Gordon Louis Jackson's paternity by

9 Thomas Edward Campbell?

10 A: I don't know.

11 Q: Do you have any -- do you know if any of

12 the other members of the Campbell family had reason

13 to believe or know that Gordon Louis Jackson was

14 Thomas Edward Campbell's child?

15 A: I do not know.

16 Q: Was Gordon Louis Jackson aware that he was

17 Thomas Edward Campbell's child when Thomas Edward

18 Campbell died in 1982?

19 A: Yes.

20 Q: Do you agree that Gordon Louis Jackson

21 would have been 41 years old in 1982?

22 A: Yes.

23 Q: He was born in '41?

24 A: He was born 1941.

25 Q: Did Gordon Louis Jackson expect that he

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1 was supposed to be taken care of in some way by

2 Thomas Edward Campbell after he died?

3 A: I do not know.

4 Q: When did Gordon Louis Jackson learn that

5 he was not receiving anything from Thomas Edward

6 Campbell's estate?

7 A: I don't know.

8 Q: Did you and Gordon Louis Jackson have

9 discussions about Thomas Edward Campbell's estate

10 after he died in 1982?

11 A: No.

12 Q: Okay. Did Gordon Louis Jackson take any

13 action to be included in the estate of Thomas Edward

14 Campbell when Thomas Edward Campbell died or in the

15 three years following thereafter?

16 A: Not that I'm aware of.

17 Q: Did y'all discuss taking any action of

18 that sort?

19 A: No.

20 Q: Why not?

21 A: That was my husband's decision on what he

22 wanted to do.

23 Q: So your husband did not want to take

24 action?

25 A: I don't know.

Page 32

1 Q: Did Gordon Louis Jackson ever attempt

2 contact any of the Campbell family members regarding

3 inheritance rights?

4 A: I don't know.

5 Q: Do you understand that Thomas Edward

6 Campbell's estate was discharged in 1984?

7 MR. GLEISSNER: Object to the form of the

8 question.

9 Go ahead and answer.

10 A: Repeat that, please.

11 Q: Yes, ma'am. Do you understand that Thomas

12 Edward Campbell's estate was discharged in 1984?

13 MR. GLEISSNER: Object to the form of the

14 question.

15 Q: He's allowed to object, but you still

16 answer unless he jumps and screams don't answer.

17 A: When you say 1984...

18 Q: How about this? We'll look at a document

19 on that question. Let's just put a pin in it.

20 Okay. All right. What is the -- is

21 there anything other than -- strike that.

22 What is the factual basis for your

23 claim that the Campbell family knew or should have

24 known that Gordon Louis Jackson was an heir of

25 Thomas Edward Campbell?

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1 A: Repeat that, please.
 2 Q: Sure. Let's go through the family kind of
 3 one by one. Do you understand there are five people
 4 who received an inheritance from the estate of
 5 Thomas Edward Campbell?
 6 A: No.
 7 Q: Okay. Do you know who Thomas Edward
 8 Campbell's heirs-at-law were, his -- what is law
 9 calls natural-born children? Do you know what their
 10 names were?
 11 A: I read them on the obituary.
 12 Q: Okay. Do you understand their names to
 13 have been Claude Campbell, Charles Campbell, Colbert
 14 Campbell, Claytor Campbell, and Vivian Gardner?
 15 A: Yes.
 16 Q: Have you ever met any of those folks?
 17 A: No. I met Claude.
 18 Q: You met Claude?
 19 A: Uh-huh.
 20 Q: How many times did you meet Claude?
 21 A: I seen him several times up at the store
 22 in Elgin.
 23 Q: All right, all right. So other than
 24 Claude, you've never met any of the other siblings?
 25 A: No.

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1 Q: All right. Did Claude ever tell you that
 2 he knew Gordon Louis Jackson was T.E.'s child?
 3 A: No.
 4 Q: Do you have any basis to believe that
 5 Claude knew that Gordon Louis Jackson was T.E.'s
 6 child?
 7 A: Just by his action. That's all.
 8 MR. PORTER: We've got Jonathan Harling
 9 coming in.
 10 MR. GLEISSNER: Hey, Jonathan, we saved
 11 you a seat.
 12 MR. HARLING: Good morning. I thank you.
 13 How are y'all?
 14 Q: What action was that that gave you that
 15 indication?
 16 A: Just in his general speaking. That's all.
 17 Q: Was he polite?
 18 A: Yes.
 19 Q: Okay. Did he call Gordon a relative or
 20 anything like that?
 21 A: No.
 22 Q: But because he was courteous?
 23 A: Uh-huh.
 24 Q: You assume he knew?
 25 A: Right.

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1 Q: Anything else that gives you the
 2 indication that Claude Campbell knew that Gordon
 3 Louis Jackson was Thomas Edward Campbell's son?
 4 A: No.
 5 Q: All right. Do you have any reason to
 6 believe that Charles Campbell, Maxine Campbell's
 7 late husband, knew that Gordon Louis Jackson was
 8 Thomas Edward Campbell's son?
 9 A: I do not know.
 10 Q: Do you have any reason to believe that
 11 Maxine Watts Campbell -- have you ever met
 12 Ms. Maxine Campbell?
 13 A: No.
 14 Q: Do you have any reason to believe that she
 15 knew that Gordon Louis Jackson was Thomas Edward
 16 Campbell's son?
 17 A: I do not know.
 18 Q: Okay. You never met you Claytor Campbell
 19 is that right?
 20 A: No.
 21 Q: Do you have any reason to believe that
 22 Claytor Campbell knew that Gordon Louis Jackson was
 23 Thomas Edward Campbell's son?
 24 A: I do not know.
 25 Q: Have you ever met Tommy Campbell,

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1 Claytor's son who's sitting at the end of the table
 2 other than this morning?
 3 A: No.
 4 Q: Do you have any reason to believe that
 5 Tommy Campbell knew that Gordon Louis Jackson was
 6 Thomas Edward Campbell's son?
 7 A: No.
 8 Q: All right. Colbert Campbell, you've never
 9 met Colbert Campbell; is that right?
 10 A: No.
 11 Q: Do you have any reason to believe that
 12 Colbert, who is deceased, knew that Thomas Edward
 13 Campbell's Gordon Louis Jackson's father?
 14 A: No.
 15 Q: Do you have any reason to believe that
 16 Colbert's widow, Frances, knew that Gordon Louis
 17 Jackson was Thomas Edward Campbell's father?
 18 A: No.
 19 Q: Vivian Gardner, who's the only daughter,
 20 have you ever met her?
 21 A: No.
 22 Q: Do you have any reason to believe that
 23 Vivian knew that Gordon Louis Jackson was Thomas
 24 Edward Campbell's son?
 25 A: I do not know.

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1 Q: All right. So we talked about Claude
 2 Campbell. And anything other than Claude was polite
 3 and courteous that makes you think that Claude knew
 4 that Gordon Louis Jackson was Thomas Edward
 5 Campbell's son?
 6 A: Not that I'm aware of.
 7 Q: Claude's -- you understand Claude's been
 8 deceased since 2017 -- '15? 2015?
 9 A: Yes.
 10 Q: His children are -- or two of his children
 11 are Barry Campbell and Sonja Campbell Parker, and
 12 they're named in this lawsuit. Do you have any
 13 reason to believe that Barry Campbell or Sonja
 14 Campbell Parker knew that Gordon Louis Jackson was
 15 Thomas Edward Campbell's son?
 16 A: I don't know.
 17 Q: All right. Have any of those Campbell
 18 children had any conversations with the other
 19 plaintiffs in this lawsuit that you're aware of,
 20 that being Melissa Jackson, Tyre Jackson, Reginald
 21 Allen, Bryant Allen, Andre Allen, or Timothy
 22 Johnson?
 23 A: Repeat this please.
 24 Q: Sure. And I can break it up, if you need
 25 me to.

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1 A: Okay.
 2 Q: What I'm asking you is did you know if any
 3 of the plaintiffs -- so your daughters, Melissa and
 4 Tyre Jackson; and your stepsons, Reginald Allen,
 5 Bryant Allen, Andre Allen, and Timothy Johnson, if
 6 any of them have had any conversations with the
 7 Campbells. Are you aware ---
 8 A: I don't know.
 9 Q: Okay. Do you have any evidence that any
 10 of the Campbell children knew that Gordon Louis
 11 Jackson was Thomas Edward Campbell's son when Thomas
 12 Edward Campbell's estate was probated?
 13 A: Repeat, that please.
 14 Q: Do you have any evidence that any of the
 15 Campbell children -- when I say Campbell children, I
 16 mean Claude Campbell, Charles Campbell, Colbert
 17 Campbell, Claytor Campbell, and Vivian Gardner --
 18 knew that Gordon Louis Jackson was Thomas Edward
 19 Campbell's son when Thomas Edward Campbell's estate
 20 was probated?
 21 A: I don't know.
 22 Q: Okay. Do you have any evidence that any
 23 of the Campbell children, Claude Campbell, Charles
 24 Campbell, Colbert Campbell, Vivian Gardner, and
 25 Claytor Campbell took action to intentionally

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1 exclude Gordon Louis Jackson from participating in
 2 the estate of Thomas Edward Campbell?
 3 A: I don't know.
 4 Q: I've asked this in two different ways, but
 5 I just want to ask it the same way or this same way
 6 another time, so please forgive me if I sound like a
 7 broken record. Has Gordon Louis Jackson's paternity
 8 by Thomas Edward Campbell ever been legally
 9 established?
 10 A: Not that I'm aware of.
 11 Q: And is it fair to say, to your knowledge,
 12 that Gordon Louis Jackson's paternity by Thomas
 13 Edward Campbell had not been legally established by
 14 the time of Thomas Edward Campbell's death in 1982?
 15 A: (No audible response.)
 16 Q: You want me to ask that a different way?
 17 A: Yeah.
 18 Q: Had Gordon Louis Jackson's paternity by
 19 Thomas Edward Campbell been legally established
 20 prior to Thomas Edward Campbell's death in 1982?
 21 A: No. No more than his father saying so.
 22 Q: Okay. What damages are you seeking in
 23 this lawsuit?
 24 A: Whatever belongs to my husband as a
 25 rightful heir to the Campbell estate.

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1 Q: Do you believe your husband is a rightful
 2 heir to the Campbell estate?
 3 A: His father said that was his son.
 4 Q: Do you understand that the estate has now
 5 been passed on, in some cases multiple times, to
 6 people who are not even the immediate children of
 7 Thomas Edward Campbell?
 8 A: No.
 9 Q: Okay. Do you understand that only one of
 10 the direct recipients of Thomas Edward Campbell's
 11 estate is still living?
 12 A: Yes.
 13 Q: Do you think it's appropriate for the
 14 grandchildren of Thomas Edward Campbell or the
 15 daughters-in-law of Thomas Edward Campbell who
 16 weren't involved in the estate to have to give up
 17 anything they inherited as a result of your lawsuit?
 18 MR. HARLING: Object to the form.
 19 MR. GLEISSNER: I was gonna do that.
 20 MR. HARLING: Sorry.
 21 MR. GLEISSNER: Go ahead and answer.
 22 A: Okay. Repeat, please.
 23 Q: Yeah. Do you think it's appropriate for
 24 the grandchildren of Thomas Edward Campbell or the
 25 daughters-in-law of Thomas Edward Campbell to have

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1 to give up anything they've inherited as a result of
 2 your lawsuit?
 3 MR. GLEISSNER: Object to the form.
 4 A: Yes. Because Mr. Campbell said he was
 5 Gordon's daddy.
 6 Q: Okay. What role did Claude Campbell, to
 7 your knowledge, have in Gordon Louis Jackson's
 8 exclusion from Thomas Edward Campbell's estate?
 9 A: Repeat, that please.
 10 Q: Sure. Do you know if Claude Campbell had
 11 any role in Gordon Louis Jackson's exclusion from
 12 Thomas Edward Campbell's estate?
 13 A: I don't know.
 14 Q: Do you know if Thomas Claytor Campbell had
 15 any role in Gordon Louis Jackson's exclusion from
 16 Thomas Edward Campbell's estate?
 17 A: I do not know.
 18 Q: Do you know if Colbert Harold Campbell had
 19 any role in Gordon Louis Jackson's exclusion from
 20 Thomas Edward Campbell's estate?
 21 A: I do not know.
 22 Q: Do you know if Vivian C. Gardner had any
 23 role in Gordon Louis Jackson's exclusion from Thomas
 24 Edward Campbell's estate?
 25 A: I do not know.

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1 Q: And last, do you know if Charles Campbell
 2 had any role in Gordon Louis Jackson's exclusion
 3 from Thomas Edward Campbell's estate?
 4 A: I do not know.
 5 Q: All right. Do you know if either of the
 6 children named in this lawsuit of Claude Campbell,
 7 who are Sonja Campbell Parker and Barry Campbell,
 8 had any role in Gordon Louis Jackson's exclusion
 9 from Thomas Edward Campbell's estate?
 10 A: I don't know.
 11 Q: Do you know of anything Thomas Claytor
 12 Campbell's son, Claytor -- or Tommy Campbell, had in
 13 Gordon Louis Jackson's exclusion from Thomas Edward
 14 Campbell's estate?
 15 A: No.
 16 Q: Do you know of any role played by Frances
 17 Campbell, the widow of Colbert Campbell, in Gordon
 18 Louis Jackson's exclusion from Thomas Edward
 19 Campbell's estate?
 20 A: No.
 21 Q: Do you know of any role played by Maxine
 22 Campbell in Gordon Louis Jackson's exclusion from
 23 Thomas Edward Campbell's estate?
 24 A: No.
 25 Q: Do you know of anything that Claude

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1 Campbell did that was wrong or fraudulent to your
 2 late husband, Gordon Louis Jackson?
 3 A: I don't know.
 4 Q: Do you know of anything that Thomas
 5 Claytor Campbell did that was wrong or fraudulent to
 6 your late husband Gordon Louis Jackson?
 7 A: No.
 8 Q: Do you know of anything that Colbert
 9 Harold Campbell did that was wrong or fraudulent to
 10 your late husband Gordon Louis Jackson?
 11 A: No.
 12 Q: Do you know of anything that Vivian
 13 Gardner did that was wrong or fraudulent to your
 14 late husband Gordon Louis Jackson?
 15 A: No.
 16 Q: Do you know of anything that Charles
 17 Edward Campbell did that was wrong or fraudulent to
 18 your late husband Gordon Louis Jackson?
 19 A: No.
 20 Q: Do you know of anything that the children
 21 of Claude E. Campbell who are named in this lawsuit
 22 Sonja Campbell Parker and Barry Campbell, did that
 23 was wrong or fraudulent to Gordon Louis Jackson?
 24 A: I don't know.
 25 Q: Do you know of anything that the widow of

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1 Colbert Harold Campbell, Frances Campbell, did that
 2 was wrong or fraudulent to Gordon Louis Jackson?
 3 A: No.
 4 Q: Do you know of anything that the child of
 5 Thomas Claytor Campbell, Tommy Campbell, Jr., did
 6 that was wrong or fraudulent to Gordon Louis
 7 Jackson?
 8 A: No.
 9 Q: And last, do you know of anything that
 10 Maxine Watts Campbell has done that was wrong or
 11 fraudulent to Gordon Louis Jackson?
 12 A: No.
 13 Q: Okay. Other than what you've told me
 14 about Claude being kind to you and your
 15 interactions, do you have any evidence that any of
 16 the five Campbell children, Claude, Thomas Claytor
 17 Campbell, Colbert Harold Campbell, Vivian Gardner,
 18 and Charles E. Campbell knew that Gordon Louis
 19 Jackson was Thomas Edward Campbell's son when the
 20 estate of Thomas Edward Campbell was opened?
 21 A: I don't know.
 22 Q: Okay.
 23 MR. PORTER: Would y'all like to take a
 24 bathroom break?
 25 MR. GLEISSNER: No. I'm fine.

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1 MR. PORTER: Cool. Are you good?
 2 THE WITNESS: Yes.
 3 Q: Okay. Do you have any evidence that
 4 anyone committed a fraud to keep Gordon Louis
 5 Jackson from receiving a portion of the estate of
 6 Thomas Edward Campbell?
 7 A: I do not know.
 8 Q: Do you know if anybody had a duty to
 9 notify Gordon Louis Jackson about the death of
 10 Thomas Edward Campbell?
 11 MR. GLEISSNER: Object to ---
 12 A: Repeat that, please.
 13 MR. GLEISSNER: Oh.
 14 THE WITNESS: Oh.
 15 MR. GLEISSNER: Never mind.
 16 A: Go ahead.
 17 Q: Do you know if anybody had a duty to
 18 notify Gordon Louis Jackson about the death of
 19 Thomas Edward Campbell?
 20 MR. GLEISSNER: Object to the form.
 21 Go head and answer.
 22 A: I don't know.
 23 Q: When did Gordon Louis Jackson learn that
 24 Thomas Edward Campbell died?
 25 A: I don't know.

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1 Q: When did you learn that Thomas Edward
 2 Campbell had died?
 3 A: I heard it in the news and phone calls.
 4 Q: So shortly after his death?
 5 A: Uh-huh.
 6 MR. GLEISSNER: Is that a "yes"?
 7 A: Oh, yes.
 8 Q: Would Gordon Louis Jackson have also
 9 learned shortly after his death?
 10 A: Yes.
 11 Q: Okay. Is there anything that prevented
 12 you or Gordon from taking legal action at that time
 13 over Thomas Edward Campbell's estate?
 14 A: Repeat, that please.
 15 Q: Sure. Is there anything that prevented
 16 y'all from going to take legal action at that time
 17 over Thomas Edward Campbell's estate?
 18 A: That was my husband's choice.
 19 Q: Okay. And so we're clear on the record,
 20 your husband knew he was Thomas Edward Campbell's
 21 son prior to Thomas Edward Campbell's death;
 22 correct?
 23 A: Yes.
 24 Q: And he knew about Thomas Edward Campbell's
 25 death shortly thereafter; correct?

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1 A: Yes.
 2 Q: And at what point did he know he was not
 3 receiving anything from Thomas Edward Campbell after
 4 his death?
 5 A: I don't know.
 6 Q: When did you first come to the -- do you
 7 believe -- you believe now that Gordon Louis Jackson
 8 should have received something from Thomas Edward
 9 Campbell when he died?
 10 A: Yes.
 11 Q: When did you first arrive at that belief?
 12 A: From the time his daddy acknowledged that
 13 that was his son.
 14 Q: Okay. So even before Thomas Edward
 15 Campbell died you believe that Gordon was entitled
 16 to an inheritance?
 17 A: Yes.
 18 Q: So when Thomas Edward Campbell died in
 19 1982, at that time you believed Gordon Louis Jackson
 20 was entitled to an inheritance?
 21 A: Yes. He should have got something.
 22 Q: To your knowledge, did Gordon also believe
 23 back then in the '80s that he was entitled to an
 24 inheritance?
 25 A: Yes.

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1 Q: Did he take any action to receive an
 2 inheritance in the 1980s?
 3 A: No.
 4 Q: Did he take any action to receive an
 5 inheritance during his lifetime?
 6 A: No.
 7 Q: Why did you wait until 2023 to take action
 8 over this inheritance?
 9 A: Why?
 10 Q: Yes, ma'am.
 11 A: Because, like I say, we had been talking
 12 and just decided to take action. That's all.
 13 Q: When you said we were talking, you're
 14 talking about your conversations with Charles Ives?
 15 A: And my children and my stepsons.
 16 Q: And this -- these conversations all began
 17 following your conversations with Charles Ives; is
 18 that right?
 19 A: Yes.
 20 Q: Was it Charles Ives' idea to take this
 21 action?
 22 A: No.
 23 Q: Did Charles Ives make the discussion that
 24 you should pursue an entitlement of Thomas Edward
 25 Campbell's estate?

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1 A: No.

2 Q: Okay. Has Charles Ives assisted in paying

3 any of your legal bills?

4 A: No.

5 MR. GLEISSNER: You already answered.

6 Never mind.

7 Who pays legal bills is kind of

8 attorney-client privilege but ---

9 MR. PORTER: If it's the client.

10 MR. GLEISSNER: Never mind. She already

11 answered.

12 MR. PORTER: If it's the client, yeah.

13 Q: But your testimony is Charles Ives has not

14 assisted in paying your legal bills?

15 A: I don't know.

16 Q: Okay. Have you paid legal bills in this

17 case? And give your attorney time to object if he

18 wants to object to that question.

19 MR. GLEISSNER: I am going to object to

20 that question.

21 A: Me too.

22 MR. GLEISSNER: And her too.

23 MR. PORTER: And I'll -- I'm not gonna

24 require to you file a protective order.

25 MR. GLEISSNER: Thank you.

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1 MR. PORTER: --- right now. I'll let you

2 know. I may do some ruminating. I think what

3 will probably happen is a subpoena in a

4 different case.

5 MR. GLEISSNER: Ruminating away.

6 MR. PORTER: Yeah. Well, I'm not gonna

7 put you on a five-day clock until I get done

8 ruminating. That works?

9 MR. GLEISSNER: I appreciate it.

10 MR. PORTER: Cool.

11 Q: All right. Did you ever look into legal

12 claims over the estate of Thomas Edward Campbell

13 prior to Gordon Louis Jackson dying?

14 A: Repeat that, please.

15 Q: Yes, ma'am. Did you or you and your

16 husband ever look into pursuing legal claims over

17 the estate of Thomas Edward Campbell prior to your

18 husband's death?

19 A: No.

20 Q: And it's fair to say y'all never met with

21 a lawyer about potential claims, you and your

22 husband never met with a lawyer about potential

23 claims during your husband's lifetime?

24 A: No.

25 Q: I created a double negative. Did you and

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1 your husband ever meet with a lawyer about potential

2 claims over this estate during your husband's

3 lifetime?

4 A: No.

5 Q: Have you personally reviewed any probate

6 documents from the estate of Thomas Edward Campbell?

7 A: No.

8 Q: Did you review your lawsuit in this case

9 before it was filed?

10 A: Repeat that, please.

11 Q: Did you review the complaint in this case

12 before it was filed?

13 A: No.

14 Q: Have you reviewed the complaint in this

15 case?

16 A: No.

17 Q: Now, I'll ask a question. Give your

18 lawyer an appropriate amount of time to object. But

19 I think the final part of this question will

20 trigger -- well, I don't think it would be

21 privileged, but obviously they can still object if

22 they want.

23 Have any of your legal bills in this

24 case been paid or agreed to have been paid by any

25 third parties, meaning people who are not parties to

Page 52

1 this lawsuit?

2 A: Repeat that again.

3 Q: Sure. Has anyone who is not a party to

4 this lawsuit agreed to pay your legal bills in this

5 case?

6 A: No.

7 Q: Okay.

8 MR. GLEISSNER: I guess I should have

9 objected but ...

10 THE WITNESS: Well, you got to speak up.

11 MR. GLEISSNER: I'm sorry. I should have

12 objected but ---

13 THE WITNESS: Don't leave me out this ---

14 MR. GLEISSNER: I knew the answer, so I

15 didn't object.

16 THE WITNESS: --- drowning.

17 Q: And your testimony earlier was you found

18 your lawyers in this case through Charles Ives; is

19 that correct?

20 A: Yes.

21 Q: Okay. How did that come about? Did he

22 recommend you call these lawyers?

23 A: I don't remember.

24 Q: Okay. And you've known Charles Ives for

25 approximately four years?

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1 A: Yes.

2 Q: Okay. Other than your family members who

3 are in this lawsuit, so that's Melissa, Tyre,

4 Reginald, Bryant, Andre, and Timothy, do you know of

5 anybody who has knowledge of facts or circumstances

6 that are relevant to Gordon Louis Jackson, the claim

7 that Gordon Louis Jackson is Thomas Edward

8 Campbell's son?

9 A: Repeat that, please.

10 Q: Sure. Do you know of anybody who's gonna

11 be able to testify that Gordon Louis Jackson is

12 Thomas Edward Campbell's son?

13 A: No.

14 Q: Okay. Did Gordon Louis Jackson publicly

15 claim to people other than you during his lifetime

16 that he was Thomas Edward Campbell's son?

17 A: He said he did, but I don't know.

18 Q: Did you ever witness him tell someone

19 other than you that he was Thomas Edward Campbell's

20 son?

21 A: Just the guys he used to hang out with.

22 Q: Okay.

23 MR. PORTER: This will be Exhibit 1.

24 - - -

25 (Probate Court Estate Documents)

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1 of Thomas Edward Campbell Bates

2 Labeled 230 - 235, marked

3 Defendants' Exhibit Number 1 for

4 identification.)

5 - - -

6 MR. HARLING: What number is this?

7 MR. PORTER: 1.

8 Q: I've handed you several documents that

9 bear the Bates number Campbell 230 through 235.

10 Have you ever seen these documents before?

11 A: No.

12 Q: These are documents from the estate of

13 Thomas Edward Campbell. It reflects that Thomas

14 Edward Campbell died without a will on June 12th of

15 1982. My first question is: Do you have any reason

16 to assert that there is a will that exists or

17 existed as of 1982 when Thomas Edward Campbell died?

18 A: I got the indication from him that it was.

19 Now, I can't prove it.

20 Q: What did he say to indicate that to you?

21 A: Because like I said, he mentioned about

22 Gordon coming back that Monday. And that's all I

23 know.

24 Q: Okay. And this lists five children of

25 Thomas Edward Campbell on page 1, Claude Campbell,

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1 Claytor Campbell, Colbert Harold Campbell, Vivian

2 Gardner, and Charles Edward Campbell. And these are

3 said by this document to be the only heirs-at-law.

4 Do you know of any -- strike that.

5 Do you know of -- yeah, I think we've

6 asked that. Bear with me.

7 Turn to the page that -- on the

8 bottom right, says 232.

9 A: Uh-huh.

10 Q: This states that Claude Campbell was the

11 administrator of the estate of Thomas Edward

12 Campbell. Do you know of any role that any of the

13 other Campbell children played in the processing of

14 the estate other than Claude Campbell's role as

15 administrator?

16 A: No.

17 Q: And turn to the last page, please. This

18 states that the administrator complied with Section

19 41 of the Probate Code and published in conformity

20 with law at least one month a citation calling upon

21 all parties concerned to show cause before the 22nd

22 day of August 1983 for why an application for

23 probate should not be granted and that that citation

24 was published in the Chronicle Independent. Do you

25 have any reason to believe that is not true that an

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1 advertisement for this estate was published for a

2 month in the Chronicle Independent?

3 A: Say that again, please.

4 MR. GLEISSNER: He's reading this part.

5 Q: Do you have any reason to believe that

6 what's stated on page 235, that an advertisement for

7 this estate was run for a month in the Chronicle

8 Independent Newspaper was not true, that that didn't

9 actually happen?

10 A: It probably did.

11 Q: Were you aware that there was a newspaper

12 in Kershaw County called the Chronicle Independent?

13 A: Yes.

14 Q: Okay. And you and your husband were aware

15 that Thomas Edward Campbell died in Kershaw County;

16 is that right?

17 A: Yes.

18 Q: You and your husband would have been able

19 to purchase that newspaper at that time if they

20 wanted to [sic]; is that right?

21 A: True.

22 Q: All right.

23 MR. PORTER: One more exhibit.

24 - - -

25 (Copy of Obituary of Gordon

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1 Louis Jackson, marked
 2 Defendants' Exhibit Number 2 for
 3 identification.)
 4 - - -
 5 Q: I've handed you what has been marked as
 6 Exhibit 2, and I apologize the printout's a little
 7 funky.
 8 A: Uh-huh.
 9 Q: This was filed as an exhibit to a motion
 10 in your case. Does this appear to be an accurate
 11 copy of the obituary for your late husband, Gordon
 12 Louis Jackson?
 13 A: Yes.
 14 Q: And are the days of life correct, June 1,
 15 1941, to December 29th, 2013?
 16 A: Yes.
 17 Q: Is there anything that you know that we
 18 haven't talked about here today that leads you to
 19 believe that Gordon Louis Jackson was entitled to a
 20 share of the estate of Thomas Edward Campbell?
 21 A: Yes. Because Mr. Thomas Edward Campbell
 22 said that he had a plot for each one of his children
 23 at Highway Pentecostal Church.
 24 Q: Okay.
 25 A: And he named the children.

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1 Q: Who did he name?
 2 A: Oh, now, I didn't -- I can't call them,
 3 but he named all his children, and that was it.
 4 Q: How many did he name?
 5 A: He named at least about seven.
 6 Q: Okay. Was Gordon Louis Jackson buried in
 7 a plot at that church?
 8 A: No.
 9 Q: Okay. Were you ever given the plot or any
 10 title to a plot at that church?
 11 A: No. I just know what his daddy said.
 12 That's all.
 13 Q: Anything else that we haven't talked about
 14 today that causes you to believe that Gordon Louis
 15 Jackson was entitled or his entitled to a share of
 16 Thomas Edward Campbell's estate?
 17 A: No.
 18 MR. PORTER: All right. Let's take a
 19 five-minute break. I may be done. Thank you,
 20 ma'am.
 21 - - -
 22 (A break was taken.)
 23 - - -
 24 - - -
 25 (Amended Summons and Complaint,

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1 marked Defendants' Exhibit
 2 Number 3 for identification.)
 3 - - -
 4 Q: Ms. Jackson, are you ready?
 5 A: Yes.
 6 Q: Okay. Thank you. The dates of your
 7 husband's life, we didn't put in the record his
 8 birthdate, so let me put that in the record. Do you
 9 agree he was born on June 1, 1941?
 10 A: Yes.
 11 Q: Did y'all go to -- did you and your
 12 husband go to T.E. Campbell's visitation or funeral?
 13 A: We went to the funeral.
 14 Q: Okay. Did you talk to any of the children
 15 of T.E. Campbell who were in attendance at the
 16 funeral?
 17 A: Yes. We spoke to several people.
 18 Q: Which of the kids? Do ---
 19 A: Don't remember. We spoke, and that was
 20 it.
 21 Q: When's the last time you talked to Charles
 22 Ives?
 23 A: Been a long time now.
 24 Q: Has Charles Ives -- I asked you about bill
 25 pay. Has Charles Ives offered to provide testimony

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1 for you in this lawsuit?
 2 A: No.
 3 Q: Okay. Has Charles Ives offered you any
 4 other sort of support or benefit?
 5 A: No.
 6 Q: Okay. I've handed you what's been marked
 7 as Exhibit 3 to your deposition.
 8 A: Uh-huh.
 9 Q: And this is a copy of the amended
 10 complaint in your case. Have you seen this before?
 11 A: I don't think so.
 12 Q: Okay. Paragraph 17 of the complaint on
 13 page 3, it says that the defendants knew or should
 14 have known that Gordon Louis Jackson was a natural
 15 child of Thomas Edward Campbell. Do you believe
 16 that Thomas Edward Campbell's children who are named
 17 in the complaint knew or should have known that
 18 Gordon Louis Jackson was a natural child of Thomas
 19 Edward Campbell?
 20 MR. HARLING: Object to the form.
 21 Q: Let's break that up. Do you know if any
 22 of the children -- and let's look at Exhibit 1. The
 23 front of the Exhibit 1 lists Claude through Charles
 24 E. Do you know if any of them five kids of Thomas
 25 Edward Campbell, Claude, Claytor, Colbert, Vivian,

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1 and Charles knew that Gordon Louis Jackson was a
 2 natural child of Thomas Edward Campbell?
 3 MR. HARLING: Object to the form.
 4 A: I don't know.
 5 Q: Okay. Do you know if any of them should
 6 have known that Gordon Louis Jackson is a natural
 7 child of Thomas Edward Campbell?
 8 A: At least maybe Claude.
 9 Q: And what do you base that on?
 10 A: Because Claude had other outside children
 11 also.
 12 Q: Anything else?
 13 A: That's it.
 14 Q: All right. Turn with me to page 5 of the
 15 amended complaint, please.
 16 A: Okay.
 17 Q: At paragraph 25 it says that the
 18 defendants used actual or constructive fraud,
 19 duress, abuse of confidence, or unconscionable
 20 conduct in order to acquire the property. Do you
 21 have any knowledge of any of the Campbell children
 22 who are listed on Exhibit 1, Claude, Claytor,
 23 Colbert, Vivian, and Charles using actual or
 24 constructive fraud, duress, abuse of confidence, or
 25 unconscionable conduct in order to inherit from

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1 Thomas Edward Campbell?
 2 MR. HARLING: Object to the form.
 3 A: No, I don't know.
 4 Q: Do you have any evidence or knowledge of
 5 any of those five people doing anything with actual
 6 or constructive fraud, duress, abuse of confidence,
 7 or unconscionable conduct to your late husband,
 8 Gordon Louis Jackson?
 9 MR. HARLING: Object to the form.
 10 A: No. Not that I'm aware.
 11 Q: Let me ask you in plain English. What bad
 12 things have Claude Campbell, Claytor Campbell,
 13 Colbert Campbell, Vivian Gardner, or Charles
 14 Campbell done to Gordon Louis Jackson?
 15 A: Nothing. Not I'm aware of.
 16 Q: In this lawsuit you're seeking money
 17 damages. Do you know how much damages you're
 18 seeking?
 19 A: No.
 20 Q: And have you been involved in any efforts
 21 to provide a calculation for the damages you're
 22 seeking?
 23 A: No.
 24 MR. PORTER: I don't have any other
 25 questions. Thank you, ma'am. It's good to

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1 meet you.
 2 THE WITNESS: You're welcome.
 3 MR. GLEISSNER: We don't have any
 4 questions.
 5 - - -
 6 (Witness excused.)
 7 - - -
 8 (The deposition was concluded at 11:05 a.m.)
 9 - - -

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1 SIGNATURE OF DEPONENT
 2 I, the undersigned, MARY DOW JACKSON, do
 3 hereby certify that I have read the foregoing
 4 deposition transcript and find it to be a true and
 5 accurate transcription of my testimony, with the
 6 following corrections, if any:
 7 PAGE LINE CHANGE
 8 _____
 9 _____
 10 _____
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 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 DATE MARY DOW JACKSON

3/13/2025

MARY DOW JACKSON

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CERTIFICATE OF REPORTER

1
2
3 I, Cortney N. Glover, Registered
4 Professional Reporter and Notary Public for the State
5 of South Carolina at Large, do hereby certify:
6 That the foregoing deposition was taken
7 before me on the date and at the time and location
8 stated on page 1 of this transcript; that the
9 deponent was duly sworn to testify to the truth, the
10 whole truth, and nothing but the truth; that the
11 testimony of the deponent and all objections made at
12 the time of the examination were recorded
13 stenographically by me and were thereafter
14 transcribed; that the foregoing deposition as typed
15 is a true, accurate, and complete record of the
16 testimony of the deponent and of all objections made
17 at the time of the examination to the best of my
18 ability.

19 I further certify that I am neither related
20 to nor counsel for any party to the cause pending or
21 interested in the events thereof. Witness my hand, I
22 have hereunto affixed my official seal this 27th day
23 of March 2025, at Columbia, Lexington County, South
24 Carolina.
25

Cortney N. Glover,
Registered Professional Reporter
Notary Public
State of South Carolina at Large
My Commission expires:
December 1st, 2025

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