

RECEIVED

Jul 13 2026

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

IN THE COURT'S ORIGINAL JURISDICTION

Case No. 2026-000713

(Associated Lower Court) Case No. 2021-CP-25-00392
Honorable R. Keith Kelly, presiding

Renee S. Beach, Phillip Beach, Robin Beach, Savannah Tuten, and Seth Tuten,
..... Plaintiffs,

Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Blake Greco, Jason
D'Cruz, Vicky Ward, Max Fratoddi, Henry Rosado, and Private Investigation Services Group,
LLC, Defendants.

Of Whom,

Gregg Roman and Gravitas Synergy Solutions, LLC,Petitioners,

v.

PNC Financial Services Group, INC d/b/a PNC Bank, Renee S. Beach, Phillip Beach, Robin
Beach, Savannah Tuten, and Seth Tuten Respondents.

PETITIONERS' APPENDIX

Taylor M. Smith IV
SC Bar No. 101584
MERIWETHER LAW
923 Calhoun Street
Columbia, South Carolina 29201
(803) 779-2211
(803) 779-6700 (facsimile)
taylor@meriwetherfirm.com (email)
ATTORNEY FOR PETITIONERS

Other Counsel of Record:

Tabor Vaux
S.C. Bar No. 77421
VAUX MARSCHER BERGLIND, P.A.
PO Box 769
Bluffton, SC 29910
Office: (843) 757-2888
tabor.vaux@vmblawfirm.com
ATTORNEY FOR BEACH RESPONDENTS

Mark Brandon Tinsley
S.C. Bar No. 15597
GOODING AND GOODING, P.A.
PO Box 1000
Allendale, SC 29810
Office: (803) 584-7676
mark@goodingandgooding.com
ATTORNEY FOR BEACH RESPONDENTS

John Shannon Nichols
S.C. Bar 4210
BLUESTEIN THOMPSON SULLIVAN, LLC
1614 Taylor Street | PO Box 7965
Columbia, South Carolina 29202
Office: 803.779.7599
Fax: 803 771.8097
john@bluesteinattorneys.com
ATTORNEY FOR BEACH RESPONDENTS

APPENDIX INDEX

	Page
Subpoena to PNC Bank	1
Motion to Quash Subpoena	5
Affidavit of Gregg Roman	10
Supplemental Affidavit of Gregg Roman .	12
Form 4 Order Denying Petitioners Motion to Quash	20
Motion to Reconsider.	29
Form 4 Order Denying Motion to Reconsider	41
Motion for Rule to Show Cause	47
Subpoena to Gregg Roman	50
Response to Motion for Rule to Show Cause	101

STATE OF SOUTH CAROLINA

ISSUED BY THE CIRCUIT COURT IN THE COUNTY OF BEAUFORT

RENEE S. BEACH, PHILLIP BEACH, ROBIN
BEACH, SAVANNAH TUTEN, AND SETH
TUTEN,

PLAINTIFFS

v.

SUBPOENA IN A CIVIL CASE

GREGORY M PARKER, GREGORY M. PARKER,
INC. d/b/a PARKER'S CORPORATION, BLAKE
GRECO, JASON D'CRUZ, VICKY WARD, MAX
FRATODDI, HENRY ROSADO and PRIVATE
INVESTIGATIONS SERVICES GROUP, LLC,

Case Number: 2021-CP-25-00392

DEFENDANTS

Pending in Hampton County

TO: The PNC Financial Services Group, INC d/b/a PNC Bank
32 Shelter Cove Ln., Unit 151
Hilton Head Is., SC 29928

☐ YOU ARE COMMANDED to appear in the above-named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME , AM

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
---------------------	---------------

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects):

See Exhibit A.

PLACE Vaux Marscher Berglind, PA ATTN : Tabor Vaux 1251 May River Rd. Bluffton, SC 29910	DATE AND TIME May 16, 2025 at 4:00 PM
--	---------------------------------------

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME , AM
----------	--------------------

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Attorney/Issuing Officer's Signature
Indicate if Attorney for Plaintiff or Defendant
Attorney's Address and Telephone Number :
1251 May River Road, Bluffton, SC 29910
(843) 757-2888

5/2/2025

Date

Roberts "Tabor" Vaux, Jr.

Print Name

Clerk of Court/Issuing Officer's Signature
Pro Se Litigant's Name, Address and Telephone Number :

Date

Print Name

PROOF OF SERVICE

SERVED	DATE	FEES AND MILEAGE TO BE TENDERED TO WITNESS UPON DAILY ARRIVAL ☐ YES ☐ NO AMOUNT \$
	PLACE	
SERVED ON		MANNER OF SERVICE
SERVED BY		TITLE

DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises—or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance; or

(ii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or

(iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena:

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1)(A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(6)(B). The court may specify conditions for the discovery.

(2)(A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, the receiving party must take reasonable steps to retrieve the information. The person who produced the information must preserve the information until the claim is resolved.

Exhibit A

Any and all financial account records and statements (including but not limited to: account opening documents, signature cards, power of attorney documents, monthly statements, front and back copies of all cancelled checks, deposit tickets, checks in deposit, withdrawal tickets, cashier's checks, courtesy checks, wire transfers, online or internet transfers, alerts on the account or account holder(s), suspicious activity reports, account closure documents, etc.) related to any and all PNC Financial Services Group, INC d/b/a PNC Bank accounts in the name of Gregg Roman and/or Gregg E. Roman (DOB: 05/xx/1985; SSN ending in - 8267) and/or for Gravitas Synergy Solutions, LLC for the time period of February 24, 2019 to present including any account that has been closed or deactivated during said time period.

STATE OF SOUTH CAROLINA**COUNTY OF HAMPTON****IN THE COURT OF COMMON PLEAS****CASE NO. 2021-CP-25-00392****RENEE S. BEACH, PHILLIP BEACH,
ROBIN BEACH, SAVANNAH TUTEN,
AND SETH TUTEN,****Plaintiff,****vs.****GREGORY M PARKER, GREGORY
M. PARKER, INC. d/b/a PARKER'S
CORPORATION, BLAKE GRECO,
JASON D'CRUZ, VICKY WARD, MAX
FRATODDI, HENRY ROSADO and
PRIVATE INVESTIGATIONS
SERVICES GROUP, LLC,****Defendants.****MOTION TO QUASH**

YOU WILL PLEASE TAKE NOTICE that Gregg Roman and Gravitass Synergy Solutions, LLC (hereinafter "the non-parties") move before this court pursuant to Rule 45 and Rule 26(c), SCRCF, as well as pursuant to all other applicable law, for an order quashing the subpoenas issued by the Circuit Court in the County of Beaufort to the non-parties and issuing a protective order preventing the disclosure of such records in this action.

The non-parties so move on the following grounds:

1. Incorporated into this motion are the subpoenas and objections thereto, copies of which are filed as exhibits to this motion.
2. The objections submitted in exhibits to this motion set forth grounds to quash the subpoenas, which grounds are incorporated herein by reference as if here set forth verbatim.
3. All subpoenas issued by the Plaintiff are improper.

4. The subpoena seeks production of "any and all financial account records and statements (including but not limited to: account opening documents, signature cards, power of attorney documents, monthly statements, front and back copies of all cancelled checks, deposit tickets, checks in deposit, withdrawal tickets, cashier's checks, courtesy checks, wire transfers, online or internet transfers, alerts on the account or account holder(s), suspicious activity reports, account closure documents, etc.) related to any and all PNC Financial Services Group, INC d/b/a PNC Bank accounts in the name of Gregg Roman and/or Gregg E. Roman (DOB: 05/xx/1985; SSN ending in -8267) and/or for Gravitas Synergy Solutions, LLC for the time period of February 24, 2019 to present including any account that has been closed or deactivated during said time period."
5. Movant Gregg Roman is a journalist who conducts investigative reporting activities. He maintains confidential relationships with sources and uses his financial accounts to fund journalistic activities. These accounts contain records of financial transactions that would reveal confidential sources, areas of investigation, and proprietary journalistic methods.
6. Movant Gravitas Synergy Solutions, LLC, is a business entity through which Mr. Roman conducts both journalistic activities and private consulting services. Gravitas maintains binding non-disclosure agreements with all clients and vendors, creating contractual obligations of confidentiality that would be violated by disclosure of the requested financial records.
7. Movants are Pennsylvania residents/entities with banking accounts maintained through PNC Bank's Pennsylvania offices. Movants have no connection to Hampton County, South Carolina, or to the underlying litigation.

8. The subpoena requests information that has been gathered pursuant to S.C. Code Ann. § 19-11-100, which sets forth a qualified privilege against disclosure “of any information, document, or item obtained or prepared in the gathering or dissemination of news.”
9. S.C. Code Ann. §19-11-100(A) protects a "person, company, or entity" engaged in or that has been engaged in the gathering and dissemination of news for the public through a newspaper, book, magazine, radio, television, news or wire service, or other medium from being compelled to disclose information underlying news gathering activities.
10. Under S.C. Code Ann. §19-11-100(B), the party seeking to overcome the journalist's privilege must establish by "clear and convincing evidence" that the financial records sought are: (1) material and relevant to the controversy; (2) cannot be reasonably obtained by alternative means; and (3) are necessary to the proper preparation of their case. The requesting party has failed to make this showing.
11. The non-parties are protected by this privilege, as the attached affidavit makes clear.
12. Additionally, the subpoena at issue is defective and otherwise unenforceable because it fails to comply with the Uniform Interstate Depositions and Discovery Act (“UIDDA”), adopted in South Carolina by S.C. Code Ann. §15-47-100 et seq. PNC Bank is headquartered in Pittsburgh, Pennsylvania, presumably where the document production facilities also reside. The procedure identified un UIDDA requires service of the attached subpoena upon the clerk of court for the Pennsylvania county where discovery is sought. These procedures were not followed here, and the subpoena therefore is jurisdictionally defective and void.
13. Even more, as non-parties to this litigation who are not involved in the underlying dispute, movants are entitled to heightened protection from undue burden, expense, and invasion of

privacy. The subpoena seeks six years of highly confidential banking records with no apparent relevance to the claims or defenses in this action. The blanket request for "any and all" financial records is patently overbroad and constitutes an impermissible fishing expedition. The financial records sought constitute trade secrets under the South Carolina Trade Secrets Act, S.C. Code Ann. § 39-8-20, as they would reveal confidential business relationships that derive independent economic value from not being generally known and that have been subject to reasonable efforts to maintain their secrecy through non-disclosure agreements. Section 39-8-20(5)(b) specifically notes that "a trade secret may consist of a simple fact, item, or procedure, or a series or sequence of items or procedures which, although individually could be perceived as relatively minor or simple, collectively can make a substantial difference in the efficiency of a process or the production of a product, or may be the basis of a marketing or commercial strategy." The journalist's network of sources and business relationships constitute such trade secrets.

14. Finally, movants have entered into legally binding non-disclosure agreements (NDAs) with clients, sources, and vendors. Disclosure of financial records would effectively force movants to breach these contractual obligations by revealing the identities of parties with whom they have confidential business relationships.
15. To the extent that the subpoenas seek privileged, otherwise protected, or irrelevant matter, the non-parties move to quash them.
16. This motion is also based on all applicable statutory law, case law, common law, and the record in this action.

WHEREFORE, movants Gregg Roman and Gravitas Synergy Solutions, LLC respectfully request that this Court enter an Order:

(a) Quashing the subpoena directed to PNC Financial Services Group, Inc. d/b/a PNC Bank dated May 2, 2025, in its entirety;

(b) Issuing a protective order preventing the disclosure of movants' confidential financial records;

(c) Alternatively, staying compliance with the subpoena until the jurisdictional and procedural issues can be properly addressed; and

(d) Granting such other relief as the Court deems just and proper.

Upon information and belief, further consultation with opposing counsel concerning the subject of this motion would serve no useful purpose.

Respectfully submitted,

s/ Taylor Smith
Taylor M. Smith IV
S.C. Bar No. 101584
MERIWETHER LAW, LLC
923 Calhoun Street
Columbia, South Carolina 29201
(803) 779-2211
taylor@meriwetherfirm.com
ATTORNEY FOR GREGG ROMAN &
GRAVITAS SYNERGY SOLUTIONS,
LLC

Columbia, South Carolina
May 13, 2025

STATE OF SOUTH CAROLINA

COUNTY OF HAMPTON

IN THE COURT OF COMMON PLEAS

CASE NO. 2021-CP-25-00392

**RENEE S. BEACH, PHILLIP BEACH,
ROBIN BEACH, SAVANNAH TUTEN,
AND SETH TUTEN,**

Plaintiff,

vs.

**GREGORY M PARKER, GREGORY
M. PARKER, INC. d/b/a PARKER'S
CORPORATION, BLAKE GRECO,
JASON D'CRUZ, VICKY WARD, MAX
FRATODDI, HENRY ROSADO and
PRIVATE INVESTIGATIONS
SERVICES GROUP, LLC,**

Defendants.

AFFIDAVIT OF GREGG ROMAN

I, Gregg Roman, being first duly sworn, do hereby depose and say as follows:

1. I am over 18 years of age. I am competent to make this affidavit, and I have personal knowledge of the facts stated in this affidavit.
2. I am a journalist who uses his financial accounts to fund journalistic investigations. I am not a party to this action.
3. Gravitas Synergy Solutions, LLC, is a business entity through which I conduct both journalistic activities and private consulting services. Gravitas maintains binding non-disclosure agreements with all clients and vendors, creating contractual obligations of confidentiality that would be violated by disclosure of the requested financial records. Gravitas is not a party to this action.
4. This case appears to involve claims between the named plaintiffs and defendants regarding matters entirely unrelated to myself or Gravitas.

5. The subpoena seeks production of "any and all financial account records and statements (including but not limited to: account opening documents, signature cards, power of attorney documents, monthly statements, front and back copies of all cancelled checks, deposit tickets, checks in deposit, withdrawal tickets, cashier's checks, courtesy checks, wire transfers, online or internet transfers, alerts on the account or account holder(s), suspicious activity reports, account closure documents, etc.) related to any and all PNC Financial Services Group, INC d/b/a PNC Bank accounts in the name of Gregg Roman and/or Gregg E. Roman (DOB: 05/xx/1985; SSN ending in -8267) and/or for Gravitas Synergy Solutions, LLC for the time period of February 24, 2019 to present including any account that has been closed or deactivated during said time period."
6. I am a journalist engaged in gathering and disseminating news to the public. My financial records document investigative activities including payments to confidential sources, travel expenses to meet with sources, subscription fees for research services, and other expenses that would reveal my network of sources and areas of investigation.
7. Disclosure of this highly personal and proprietary financial information would severely impact my ability to cultivate sources and thus conduct investigations and gather news for publication.

FURTHER AFFIANT SAYETH NOT.

Texas Wise
Sworn to before me this

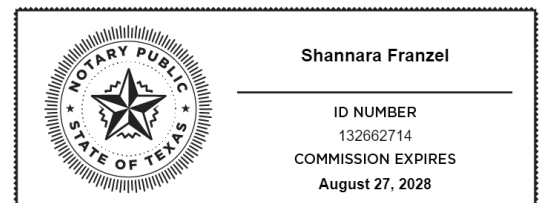
13th day of May, 2025

Shannara Franzel 132662714 (L.S.)

NOTARY PUBLIC FOR Texas

My Commission Expires: 08/27/2028

Gregg E Roman
Gregg Roman



In the Supreme Court

IN THE COURT'S ORIGINAL JURISDICTION

Case No. 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach, Savannah Tuten, and Seth Tuten,
Plaintiffs,

Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Blake Greco, Jason D'Cruz, Vicky Ward, Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC,

Defendants.

Of Whom,

Gregg Roman and Gravitas Synergy Solutions, LLC,
Petitioners,

v.

PNC, Renee S. Beach, Phillip Beach, Robin Beach, Savannah Tuten, and Seth Tuten,

Respondents.

AFFIDAVIT OF GREGG ROMAN
IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS
AND REQUEST FOR INJUNCTIVE RELIEF

I, Gregg Roman, being first duly sworn, do hereby depose and say as follows:

1. I am over 18 years of age. I am competent to make this affidavit, and I have personal knowledge of the facts stated herein. I previously submitted an Affidavit in this matter on May 13, 2025, in support of Non-Party Movants' Motion to Quash Subpoena and Alternative Motion for Protective Order. I submit this Affidavit to inform this Court of material developments since that time and to demonstrate the immediate, irreparable harm that I, my confidential sources, and my clients will suffer if PNC Financial Services Group, Inc. ("PNC") is permitted to produce the subpoenaed financial records.
2. **The threat of disclosure is immediate and imminent.** I am informed by my counsel that Plaintiffs' counsel has made a current request to PNC to supply the records sought by the subpoena, and that PNC is currently preparing to produce those records. The Court of Common Pleas entered its Order denying our Motion to Quash on February 5, 2026, and entered a further Order denying our Motion for Reconsideration on March 13, 2026 (filed

March 16, 2026). Both Orders are now in effect. I am further informed by my counsel that these interlocutory orders cannot be appealed through the ordinary appellate process and that the original jurisdiction of this Court is the only remaining avenue to obtain emergency relief before PNC completes its production. Every day that passes without relief from this Court brings the irreversible disclosure of my confidential sources, investigative methods, and professional relationships closer to reality.

3. **I am an investigative journalist and national security analyst.** I serve as Executive Director of the Middle East Forum (“MEF”), a Philadelphia-based policy research organization founded in 1990 that produces investigative journalism, policy analysis, and public education on Middle East affairs, counterterrorism, and national security. In this capacity, I am actively engaged in the gathering and dissemination of news to the public. I make over 300 media appearances annually as a security analyst, appearing on national and international television, radio, and in print media. I regularly author investigative articles, policy analyses, and opinion pieces published by major news organizations and policy journals. I have testified before the United States Congress on the findings of my investigative work. My investigative reporting has led to congressional action, policy changes at the U.S. Department of State and USAID, and the termination of over \$3 billion in federal grants to organizations with ties to designated terrorist groups.
4. **I know from direct personal experience that the exposure of a journalist’s identity, associations, and connections can be fatal.** In August 2014, my close friend and fellow journalist Steven Sotloff—with whom I attended the Interdisciplinary Center (IDC) Herzliya in Israel—appeared in a video released by the Islamic State (ISIS) threatening his execution. Steven had been held captive for over a year. Upon seeing the video, I immediately recognized that if ISIS discovered Steven’s Jewish faith and Israeli citizenship, they would almost certainly expedite his murder. Steven’s father, Arthur Sotloff, asked me directly to do whatever I could to help save his son. I assembled and led a team of volunteers who worked around the clock for two weeks to identify and remove approximately 4,000 online references to Steven’s Jewish and Israeli identity—contacting news organizations including *The New York Times*, coordinating with Facebook’s security team to remove Steven’s profile, persuading a rabbi in Los Angeles to remove a sermon referencing Steven’s background, working with the Israeli Military Censor to issue a blackout order to the Israeli press, and even physically removing a graduation photograph from the wall of his university in Israel. These efforts were covered by the BBC and reported extensively in *Tablet Magazine*. Despite everything we did, Steven was beheaded by ISIS on September 2, 2014. The experience of watching my friend die—and of spending those two weeks in a desperate, around-the-clock effort to prevent the exposure of identifying information that could accelerate his death—is seared into my consciousness. It is the reason I understand, at the most visceral and personal level, that the disclosure of a journalist’s associations,

connections, and financial relationships is not an abstract legal question. It is a matter of life and death.

5. **My investigative journalism involves clandestine intelligence operations in which sources risk their lives.** I have personally directed or co-directed multiple multi-year undercover investigations that relied on networks of confidential human sources operating at extreme personal risk. These are not abstract or hypothetical source relationships—they are documented, ongoing, and funded through the very financial accounts that the subpoena seeks to expose. I have publicly credited the “brave individuals [who] risked everything to get the truth out.” The following are representative examples from published MEF investigations that I have authored or led:

(a) *Undercover in Syria: How MEF Built a Secret Network in the Heart of a Conflict* (published April 18, 2025). This investigation, which I directed over approximately ten years (2011–2025), involved building and maintaining a clandestine underground network of high-risk informants embedded in regime-controlled areas of Syria. The network included merchants and businessmen with legitimate trade access for movement and observation, civil servants and local professionals, and military personnel—including individuals within the Syrian Army’s 4th Division and 10th Division. These sources operated under active surveillance by the Assad regime, using coded language, irregular reporting schedules, compartmentalized communications, and trusted intermediaries to relay intelligence. They maintained facades of loyalty to the regime while documenting Captagon narcotics production factories, smuggling routes, and command structures. Sources identified specific facilities—including a plastics factory with hidden cargo bays for narcotics and a chocolate factory where drugs were disguised as confectionery—as well as specific trafficking corridors and the roles of named regime figures. Discovery meant torture or death. Sources were motivated by personal losses, including family members killed by the regime, and by a conviction that the truth needed documenting. My financial records document payments to these individuals and the logistical infrastructure that sustained this network over a decade.

(b) *Syria’s Clandestine Chemical Arsenal: The Complete Dossier* (published May 5, 2025). This six-year clandestine intelligence-gathering effort (2018–2024) mapped Syria’s hidden, post-2013 chemical weapons program in unprecedented detail. The investigation relied on a dedicated network of regime insiders, including Branch 450 security and transport personnel, scientists and technicians spanning three generations of the program (from its 1970s founding through the 2010s), administrators, procurement staff, and personnel linked to dual-use front companies. Sources supplied firsthand accounts, intercepted communications, personnel records, and documentary evidence at extreme personal risk of arrest, torture, or execution. They used strict operational security protocols: changing phone numbers, avoiding

applications on work devices, using false identities for travel, and relying on family members as communication relays. The published report states that “[t]he intelligence contained herein is based on firsthand accounts from regime insiders, intercepted communications, and documentary evidence collected at great personal risk by our sources.” My financial records reflect the costs of cultivating and supporting this source network over six years, including payments, travel, and communications infrastructure.

(c) *Terror Finance at the State Department and USAID* (2025; subject of my congressional testimony in February 2025). This multi-year MEF investigation uncovered over \$164 million in approved U.S. taxpayer grants flowing to entities tied to Hamas, Hezbollah, and al-Qaeda affiliates through non-governmental organizations. The investigation relied in part on whistleblowers inside grantee organizations and aid processes who identified ignored red flags on sub-grants to terror-linked groups. My testimony before the United States Congress on these findings drew directly on source relationships and investigative methods that are documented in my financial records. The investigation led to congressional probes, criminal referral requests, and the termination of federal grants exceeding \$3 billion to terror-linked organizations.

(d) *The Antisemitism Laundromat* (published February 18, 2026) and related investigations into Islamist influence operations, Qatar’s foreign influence activities at American universities, and networks operating within the United States. These forensic investigations involve the tracking of funding flows, organizational affiliations, and personnel connections across international networks. My financial records would reveal the research services, intelligence databases, and monitoring tools I use to conduct these investigations, as well as payments to individuals who provide information about these networks.

- 6. My work with the Iranian opposition is a matter of life and death for my sources.** For more than ten years, I have worked closely with Iranian opposition figures, dissidents, activists, and civil society leaders both inside Iran and in the diaspora. Through MEF’s Iran Freedom Initiative, I coordinate with a broad network of individuals who risk imprisonment, torture, and execution by the Islamic Republic for their association with efforts to support democratic change in Iran. This work has included the deployment of over 470 Starlink satellite communications terminals inside Iran to enable opposition communications, the operation of Radio Iran broadcasting, and coordination with opposition groups across all 31 Iranian provinces. My financial records document payments, travel, communications infrastructure, and logistical support connected to this work. Disclosure of these records would reveal the identities of individuals inside Iran who have received support, have communicated with me or my organization, or have participated in opposition activities.

7. **I am currently located in an active conflict zone, which heightens the danger to my sources exponentially.** I reside with my family outside Tel Aviv, Israel. Since February 28, 2026, the United States and Israel have been engaged in a military campaign against Iran. I am writing this affidavit from a country at war. During this period, I have been producing intelligence briefings, policy analyses, and investigative reports in direct connection with the conflict, working with sources across the Middle East under extraordinarily dangerous conditions. The Iranian regime and its intelligence services are actively conducting internal security sweeps to identify and neutralize individuals suspected of collaboration with Western governments, media organizations, or opposition groups. My financial records from the period covered by the subpoena—February 24, 2019 to present—would expose the financial infrastructure supporting these sensitive wartime activities. Disclosure of these records at this moment would provide a documented roadmap of my source network to hostile state actors who are actively hunting for exactly this type of information.
8. **Gravitas Synergy Solutions, LLC maintains binding confidentiality obligations that would be violated by disclosure.** GSS is a business entity through which I conduct both journalistic activities and private consulting services for law firms, corporations, and other clients. GSS maintains binding non-disclosure agreements (“NDAs”) with all clients and vendors. The financial records sought by the subpoena would reveal the identities of GSS’s clients, the nature and scope of engagements, fee arrangements, and the timing and nature of investigative activities conducted on their behalf. Many of these clients retained GSS specifically because of the confidentiality protections inherent in our engagement, including clients involved in sensitive international matters, corporate intelligence, and legal support for ongoing litigation. Disclosure would breach these contractual obligations and destroy the trust upon which my consulting practice depends.
9. **My financial records are uniquely revealing of my journalistic sources and methods.** Unlike a typical individual’s bank records, my PNC account records and those of GSS constitute a detailed operational record of my investigative journalism and consulting practice. These records would reveal: payments to confidential sources, informants, and stringers in the Middle East and elsewhere, including individuals inside Syria who provided intelligence on narcotics trafficking and chemical weapons at risk of their lives; travel expenditures showing when and where I met with sources, including in countries where such meetings could endanger the sources; subscription fees and payments for specialized intelligence databases, research services, and monitoring tools that reveal my areas of active investigation; payments related to communications security infrastructure, including satellite communications terminals deployed inside Iran; compensation arrangements with freelance investigators, translators, and local fixers whose identities must remain confidential; transactions with Iranian diaspora organizations and individuals whose financial connections to my work, if disclosed, could result in

retaliation against their family members still inside Iran; and the identities and fee arrangements of every corporate, legal, and individual client who has retained GSS under NDA.

10. **Once disclosed, the harm cannot be undone.** The subpoena seeks “any and all financial account records and statements” spanning more than seven years, from February 24, 2019 to the present. This encompasses every cancelled check, wire transfer, deposit, withdrawal, and account alert for both my personal accounts and those of GSS. If PNC produces these records, the confidentiality of every source relationship, every client engagement, and every investigative method documented in those records will be permanently and irreversibly destroyed. I know from my experience with Steven Sotloff’s murder that once identifying information is exposed, it cannot be recalled. The two weeks I spent trying to scrub 4,000 online references to Steven’s identity taught me that even a massive, coordinated effort cannot fully contain information once it has been released. Financial records are far more granular and comprehensive than online references—they are a complete map of a journalist’s professional life. No court order can restore confidentiality once these records are in the hands of opposing counsel and potentially made part of the public record. The privilege that the South Carolina Shield Law, S.C. Code Ann. § 19-11-100, and the First Amendment are designed to protect will have been extinguished—and it will have been extinguished without any court ever having applied the mandatory three-prong test required by *Matter of Decker*, 322 S.C. 215, 471 S.E.2d 462 (1995), and without Petitioners’ counsel ever having been heard.
11. **I am not a party to the underlying litigation, and the information Plaintiffs seek is available through other means.** Neither I nor GSS is a party to *Beach v. Parker*. The Plaintiffs have named Private Investigation Services Group, LLC (“PISG”) as a defendant in the underlying action. PISG is subject to full party discovery. Any records of financial transactions between PISG and GSS or me would be available through discovery directed to PISG, which is a party whose own records would contain this information. The Plaintiffs have not demonstrated—and no court has ever found—that my financial records are “highly material and relevant,” that they “cannot be reasonably obtained by alternative means,” or that there is a “compelling and overriding interest” in their disclosure.
12. **I was denied any opportunity to be heard before the trial court ruled on my motion.** My counsel, Taylor M. Smith IV of Meriwether Law, LLC, was never notified of the November 26, 2025 hearing at which the Motion to Quash was considered. My counsel did not appear. The February 5, 2026 Order was entered after a proceeding at which only Plaintiffs’ counsel was heard on my motion. The Order mischaracterizes my motion as concerning “deposition testimony” when it concerned a subpoena duces tecum for bank records, misspells my name as “Greg Romans,” and provides no analysis under any prong of the mandatory *Decker* three-prong test. The March 13, 2026 Order denying

reconsideration similarly fails to address these deficiencies. At no point in these proceedings has any court given meaningful consideration to the journalist's privilege, the First Amendment implications, or the specific, concrete harms that disclosure would cause to me, my sources, and my clients.

13. The danger to my sources is greater today than at any prior point in my career.

Since I submitted my original affidavit in May 2025, the threat environment for my sources has dramatically worsened. The outbreak of open military conflict between the United States, Israel, and Iran in late February 2026 has placed every individual associated with Western-aligned opposition efforts at heightened risk. Iranian intelligence services are conducting internal security sweeps to identify individuals suspected of collaboration with Western governments, media organizations, or opposition groups. My financial records, if disclosed, would provide a documented trail of my relationships with individuals who fall squarely within the categories of persons the Iranian regime is currently targeting. At the same time, my source networks inside Syria remain at risk from successor regime elements and from actors who profited from the Captagon trade and chemical weapons programs that my investigations exposed. I watched a friend die because identifying information could not be fully contained. I have spent the past twelve years of my professional life building source networks that depend entirely on the assurance of confidentiality. The compelled disclosure of my financial records would betray that trust and could cost lives.

14. My investigative work has produced significant public benefits that depend on continued source confidentiality.

The investigations described above have led to congressional testimony, the termination of over \$3 billion in federal grants to terror-linked organizations, policy changes at the U.S. Department of State and USAID, and state-level enforcement actions. My investigations have produced actionable intelligence shared with U.S. and regional security partners. My forthcoming book, working title *The Carthage Doctrine*, draws on years of source relationships that would be compromised by disclosure of my financial records. The public interest in the continued protection of these source relationships—and in the ability of journalists to conduct sensitive national security investigations without fear that their financial records will be exposed in unrelated civil litigation—is substantial and direct.

15. For all of the foregoing reasons, I respectfully urge this Court to grant the relief sought in the Petition for Writ of Injunction and to enjoin PNC from producing the subpoenaed records.

The harm that will result from disclosure is immediate, irreparable, and in the current wartime context, potentially fatal to individuals who have entrusted me with their safety. I have seen firsthand what happens when a journalist's identifying information is exposed to hostile actors. There is no adequate remedy at law. Once these records are produced, no subsequent court order can restore the confidentiality that has been destroyed.

FURTHER AFFIANT SAYETH NOT.

Gregg E Roman

Gregg Roman

Sworn to before me this
18 day of March, 2026

[Signature] (L.S.)

NOTARY PUBLIC FOR Pennsylvania

My Commission Expires: 05/09/2028

Commonwealth of Pennsylvania - Notary Seal
Francisco J Santiago, Notary Public
Northampton County
My commission expires May 9, 2028
Commission Number 1446353

Notarized remotely online using communication technology via Proof.

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2021 CP-25-00392

RENEE S. BEACH, PHILLIP BEACH, ROBIN
BEACH, SAVANNAH TUTEN AND SETH
TUTEN

GREGORY M. PARKER, GREGORY M.
PARKER, INC. D/B/A PARKER'S
CORPORATION, BLAKE GRECO,
JASON D'CRUZ, VICKY WARD, MAX
FRATODDI, HENROY ROSADO AND
PRIVATE INVESTIGATIONS SERVICES
GROUP, LLC,

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: CIRCUIT COURT

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

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. ☒ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCP; ☐ 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: See page 2 for Statement of Judgement.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

Additional Information for the Clerk : Formal orders on the motions heard below to follow the filing of this Form 4.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
N/A		\$
		\$

		\$
If applicable, describe the property, including tax map information and address, referenced in the order:		

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk.

Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter:

E-Filing Note: In E-Filing counties, 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 judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

I. Motion to Quash Amended Subpoena to Non-Party Mandy Matney: **DENIED.**

THIS MATTER came before the Court on November 26, 2025, for a hearing upon Third Party Mandy Matney's Motion to Quash a Subpoena issued by the Defendant's for her deposition testimony. Present and appearing at the hearing were counsel for all parties and counsel for Third Party Mandy Matney (hereinafter "Matney"). Matney asks this Court to quash the subpoena arguing that (i) she is shielded by S.C. Code Ann. §19-11-100; (2) she faces an undue burden under Rule 45(c)(3)(A)(iv), SCRCP; and (3) her testimony lacks relevance.

South Carolina provides a qualified privilege against disclosure for news media. Pursuant to S.C. Code Ann. §19-11-100, any person or entity engaged in gathering and disseminating news through newspapers, books, magazines, broadcast media, or other similar mediums possesses a qualified privilege against the compelled disclosure of information or materials obtained during the news-gathering process. This privilege applies to any judicial, legislative, or administrative proceeding where the party asserting the privilege is not a party in interest. *Id.* Such entities may not be compelled to produce documents or testimony unless the moving party demonstrates, by

clear and convincing evidence, that the privilege was knowingly waived or that the requested information is material and relevant to the controversy, cannot be reasonably obtained through alternative means, and is essential to the proper preparation or presentation of the party's case. *Id.* The prior publication of any information or items obtained during the news-gathering process does not constitute a waiver of this qualified privilege. *Id.* However, a court may compel testimony or disclosure of information if the party seeking it shows (1) the information is highly material and relevant; (2) cannot be reasonably obtained by alternative means; and (3) necessary to the proper preparation or presentation of the case. *Matter of Decker*, 322 S.C. 215, 471 S.E.2d 462 (1995).

Under the South Carolina Rules of Civil Procedure, parties are entitled to request and shall receive from third-parties information Rule 45(c)(3)(A)(iii), SCRPC. This broad allowance to obtain information follows Rule 26(b)(1), SCRPC which similarly allows discovery "regarding any matter...which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party." In the interest of full and complete discovery process, a motion to quash shall only granted if it (i) fails to allow a reasonable time for compliance; or (ii) requires a person who is not a party nor officer, director or managing agent of a partnership that is a party, to travel more than 50 miles from the country where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or (iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or (iv) subjects a person to undue burden.

Relevant evidence is "evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence." Rule 401, SCRE; *State v. Middleton*, 441 S.C. 55 (2023). The test for relevancy "is not stringent, and its standard is not difficult to vault," as "evidence that carries even the probative weight of a feather tips a balanced scale and assists the jury in arriving at the truth of an issue." *State v. White*, 437 S.C. 490 (2022).

Rule 26(c) provides that a Court for good cause shown issue a protective order to protect a person from annoyance, embarrassment, oppression, or undue burden or expense, by ordering the discovery not to take place or placing limitations on the discovery. Once the party seeking the protective order has met its burden of showing good cause by alleging a particularized harm, the party seeking the discovery must come forward and show that the information sought "is both relevant and necessary to the case. *Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241-42, 439 S.E.2d 852, 854 (1994). When both parties meet their burden of proof, the Court must weigh the opposing factors." *Id.*

Here, after consideration of the filings of the parties, the pleadings, and the arguments presented by counsel at the hearing, the Court respectfully **denies** the Motion to Quash because Matney has not established how the qualified privilege would prevent her from being deposed and seeks blanket protection, has not shown an undue burden, and her testimony is relevant. Furthermore, the Court also **denies** Matney's alternative Motion for Protective Order because this Court finds that good cause has not been shown.

II. Greg Romans' and Gravitas Synergy Solutions' Motion to Quash: **DENIED**.

THIS MATTER came before the Court on November 26, 2025, for a hearing upon Third Party Greg Romans' and Gravitas Synergy Solutions' Motion to Quash a Subpoena issued by the Plaintiff's for his deposition testimony. Present and appearing at the hearing were counsel for all parties and counsel for Third Party Greg Romans' and Gravitas Synergy Solutions.

Under the South Carolina Rules of Civil Procedure, parties are entitled to request and shall receive from third-parties information Rule 45(c)(3)(A)(iii), SCRPC. This broad allowance to obtain information follows Rule 26(b)(1), SCRPC which similarly allows discovery "regarding any matter...which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party." In the interest of full and complete discovery process, a motion to quash shall only granted if it (i) fails to allow a reasonable time for compliance; or (ii) requires a person who is not a party nor officer, director or managing agent of a partnership that is a party, to travel more than 50 miles from the country where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or (iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or (iv) subjects a person to undue burden.

South Carolina provides a qualified privilege against disclosure for news media. Pursuant to S.C. Code Ann. §19-11-100, any person or entity engaged in gathering and disseminating news through newspapers, books, magazines, broadcast media, or other similar mediums possesses a qualified privilege against the compelled disclosure of information or materials obtained during the news-gathering process. This privilege applies to any judicial, legislative, or administrative proceeding where the party asserting the privilege is not a party in interest. *Id.* Such entities may not be compelled to produce documents or testimony unless the moving party demonstrates, by clear and convincing evidence, that the privilege was knowingly waived or that the requested information is material and relevant to the controversy, cannot be reasonably obtained through alternative means, and is essential to the proper preparation or presentation of the party's case. *Id.* The prior publication of any information or items obtained during the news-gathering process does not constitute a waiver of this qualified privilege. *Id.* However, a court may compel testimony or disclosure of information if the party seeking it shows (1) the information is highly material and relevant; (2) cannot be reasonably obtained by alternative means; and (3) necessary to the proper preparation or presentation of the case. *Matter of Decker*, 322 S.C. 215, 471 S.E.2d 462 (1995).

Under the South Carolina Rules of Civil Procedure, parties are entitled to request and shall receive from third-parties information Rule 45(c)(3)(A)(iii), SCRPC. This broad allowance to obtain information follows Rule 26(b)(1), SCRPC which similarly allows discovery "regarding any matter...which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party." In the interest of full and complete discovery process, a motion to quash shall only granted if it (i) fails to allow a reasonable time for compliance; or (ii) requires a person who is not a party nor officer, director or managing agent of a partnership that is a party, to travel more than 50 miles from the country where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or (iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or (iv) subjects a person to undue burden.

Rule 26(c) provides that a Court for good cause shown issue a protective order to protect a person from annoyance, embarrassment, oppression, or undue burden or expense, by ordering the discovery not to take place or placing limitations on the discovery. Once the party seeking the protective order has met its burden of showing good cause by alleging a particularized harm, the party seeking the discovery must come forward and show that the information sought "is both relevant and necessary to the case. *Hamm v. S.C. Pub. Serv. Comm'n*, 312 S.C. 238, 241-42, 439 S.E.2d 852, 854 (1994). When both parties meet their burden of proof, the Court must weigh the opposing factors." *Id.*

After consideration of the filings of the parties, the pleadings, and the arguments presented by counsel at the hearing, the Court respectfully **denies** Greg Romans' and Gravitas Synergy Solutions' Motion to Quash. Furthermore, the Court also **denies** Greg Romans' and Gravitas Synergy Solutions Alternative Motion for Protective Order because this Court finds that good cause has not been shown.

III. Non-Parties Hanna Betsill Jones, Samuel R. Clawson, ESQ., and Clawson & Staubes, LLC's Motion to Quash and for Protective Order: **GRANTED**

THIS MATTER came before the Court on November 26, 2025, for a hearing upon Non-Parties Hanna Betsill Jones, Samuel R. Clawson, ESQ., and Clawson & Staubes, LLC's Motion to Quash and for Protective Order. Present and appearing at the hearing were counsel for all parties and counsel for Hanna Betsill Jones, Samuel R. Clawson, ESQ., and Clawson & Staubes, LLC. Counsel for Clawson & Staubes asks this Court to quash the Defendant's November 11, 2025, subpoena, arguing that the subpoena (i) seeks highly privileged, confidential, and private information, and (ii) the subpoena is overbroad, intrusive, unduly burdensome, and intended for improper purposes

Under the South Carolina Rules of Civil Procedure, parties are entitled to request and shall receive from third-parties information Rule 45(c)(3)(A)(iii), SCRPC. This broad allowance to obtain information follows Rule 26(b)(1), SCRPC which similarly allows discovery "regarding any matter...which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party." In the interest of full and complete discovery process, a motion to quash shall only granted if it (i) fails to allow a reasonable time for compliance; or (ii) requires a person who is not a party nor officer, director or managing agent of a partnership that is a party, to travel more than 50 miles from the country

where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or (iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or (iv) subjects a person to undue burden. Further, SCRCP Rule 45(3)(B)(i) provides that the Court may on motion, quash or modify a subpoena if it “requires disclosure of a trade secret or other confidential research, development, or commercial information.”

The attorney work product doctrine protects from discovery documents prepared in anticipation of litigation unless a substantial need can be shown by the requesting party. *Tabaccoville USA, Inc. v. McMaster*, 387 S.C. 287, 294, 692 S.E.2d 526, 530 (2010); *Hickman v. Taylor*, 329 U.S. 495, 67 S.Ct. 385, 91 L.Ed. 451 (1947). A document is made in anticipation of litigation where it is prepared because of the prospect of litigation of an actual claim or potential claim. *Nat’l Union Fire Ins. Co. of Pittsburgh, Pa. v. Murray Sheet Metal Co., Inc.*, 967 F.2d 980, 984 (4th Cir. 1992). The work product of an attorney involving mental impressions, conclusions, opinions, or legal theories concerning the litigation is afforded immunity to the same extent as an attorney client privilege. *Id.* Furthermore, “Rule 26(b)(4)(B) provides a party must show exceptional circumstances to discover facts known or opinions held by an expert retained or employed by the opposing party in anticipation of litigation, but who is not expected to testify.” *Estes v. Grav*, 319 S.C. 551, 462 S.E.2d 561 (Ct. App. 1995).

Rule 26(c) provides that a Court for good cause shown issue a protective order to protect a person from annoyance, embarrassment, oppression, or undue burden or expense, by ordering the discovery not to take place or placing limitations on the discovery. Once the party seeking the protective order has met its burden of showing good cause by alleging a particularized harm, the party seeking the discovery must come forward and show that the information sought “is both relevant and necessary to the case. *Hamm v. S.C. Pub. Serv. Comm’n*, 312 S.C. 238, 241–42, 439 S.E.2d 852, 854 (1994). When both parties meet their burden of proof, the Court must weigh the opposing factors.” *Id.*

Here, after consideration of the filings of the parties, the pleadings, and the arguments presented by counsel at the hearing, the Court finds that the defendants subpoena duces tecum dated November 11, 2025, seeks privileged, confidential, and private information and that the attorney work product doctrine prevents disclosure of materials sought by the defendants. Therefore, the Court **grants** the Motion to Quash. Furthermore, the Court also **grants** the Motion for Protective Order because this Court finds that good cause has been shown and to prevent the disclosure of the Plaintiff’s focus group trade secrets or other confidential research, development, or commercial information.

Counsel for Clauson & Staubes are directed to submit a proposed protective order for review.

- IV. Private Investigator’s Motion to Amend Answer and Assert a Third-Party Complaint Against Gregg Roman and Gravitas Synergy Solutions, LLC: **DENIED.**

THIS MATTER came before the Court on November 26, 2025, for a hearing upon Private Investigator’s Motion to Amend Answer and Assert a Third-Party Complaint Against Gregg Roman and Gravitas Synergy Solutions, LLC. Present and appearing at the hearing were counsel for all parties and counsel for Private Investigator. Private Investigator defendants argue that their motion should be granted arguing that (i) written consent was given by the adverse party, (ii) that the requirements of Rule 14(a) have been satisfied, and (iii) that the amendment and proposed Third-Party Complaint will not legally prejudice any other party.

“A party may amend its pleading once as a matter of course no later than 21 days after serving it, or if the pleading is one to which a responsive pleading is required, 21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), (e), or (f), whichever is earlier. In all other cases, a party may amend his pleading only by leave of court or by written consent of the adverse party.” Rule 15(a), SCRCP. A trial court has discretion to deny a motion to amend if the party opposing the amendment can show a valid reason for denying the motion. S.C. R. Civ. P. 15(a). *Skydive Myrtle Beach, Inc. v. Horry Cnty.*, 426 S.C. 175, 826 S.E.2d 585 (2019).

“A third-party claim may be asserted under Rule 14(a) only when the third party’s liability is in some way dependent on the outcome of the main claim or when the third party is secondarily liable to the defendant.” *Beach v. Hudson*, 298 S.C. 424, 427, 380 S.E.2d 869, 871 (Ct. App. 1989). Rule 14(a) permits any party, including a third-party defendant, to move to strike the third-party claim, or for its severance or separate trial.

Here, this Court finds that the third party's liability is not dependent on the outcome of the main claim. If a third-party claim should have been filed, it was time to do so earlier when the case was filed over four years ago. It will cause confusion or is likely to do so. Allowing the amended answer and assertion of a third-party complaint will delay the trial and re-open discovery. It also appears that there is a forum issue based on the agreements between the Private Investigator defendants and Roman and Company because the agreement expressly states the exclusive jurisdiction for any dispute arising under these agreements is the state or federal courts located in Philadelphia County, Pennsylvania. Further, under Rule 15(a), far more than 21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), (e), or (f) have passed and all parties in fact do not agree or consent to add the claim because the Parker defendants oppose the addition of the third-party claim. Therefore, after consideration of the filings of the parties, the pleadings, and the arguments presented by counsel at the hearing, the Court respectfully **denies** the Motion to Amend Answer and Assert a Third-Party Complaint Against Gregg Roman and Gravitas Synergy Solutions, LLC.

IT IS SO ORDERED.

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

FORM 4C INSTRUCTIONS—JUDGMENT IN A CIVIL CASE
(Instructions for Information Only-Not to be filed with Form 4C)

1. Form 4C-Judgment in a Civil Case has been modified to add order information and enrollment instructions for the clerk of court. The purpose of Form 4 has not changed with the exception that judgment information is provided when applicable.
2. Please note that the Form 4C must be attached to all orders that include information to enroll in the judgment index. The clerk will not be responsible for reading the order to determine enrollment information.

The attorney or prevailing party will prepare and attach the Form 4C when submitting the proposed order that includes judgment enrollment information for the judgment index. The judge will review and sign Form 4C when he or she signs an order that includes judgment enrollment information for the judgment index.

3. Form 4C is not required to be submitted to the Court with orders that do not include information to enroll in the judgment index. If the clerk receives such an order without Form 4C attached, the clerk should enter and process the order pursuant to Rule 58 and Rule 77(d), SC Rules of Civil Procedure (i.e., the clerk should serve notice of entry of the judgment by mail or provide the attorneys with copies of the signed order by other means).
4. The “Information for the Judgment Index” section should be completed when the judgment affects title to real or personal property or if any amount should be enrolled. In the “Judgment in Favor of” column, enter the name of the party to whom the judgment is awarded. In the “Judgment Against” column, enter the name of the person to whom the judgment is against. The judgment amount to be enrolled should be noted in the “Judgment Amount” column. As necessary, describe any property referenced in the order if it is to be enrolled in the judgment index. If there is no judgment information to enroll, indicate “N/A” in one of the boxes in this section of the form.
5. To enter information to accommodate multiple parties, additional Form 4Cs may be used as necessary. Additional space may be inserted on the form as necessary.
6. The section “For the Clerk of Court Office Use Only” should be completed by the clerk as it has been with the previous version of Form 4.
7. If the matter is on appeal to the Circuit Court, then the parties on the form should be changed from Plaintiff and Defendant to Appellant and Respondent.
8. If an arbitrator prepares an order after arbitration, the arbitrator should strike through “Circuit Court Judge” and indicate “Arbitrator” in the signature block.

9. If a Special Circuit Court Judge, Master in Equity, or Special Referee prepares an order after hearing a Circuit Court matter, then he or she should strike through the title "Circuit Court Judge" below the signature line and indicate the appropriate title.
10. When an Order of Foreclosure is filed, neither the parties or debt owed should be listed in the Information for the Judgment Index Section, unless the foreclosure order specifically requires entry of the full judgment amount before the foreclosure sale, pursuant to Section 29-3-650 of the SC Code.
11. If the deficiency judgment is waived in a Foreclosure action, indicate N/A in the "Judgment Amount To Be Enrolled" box.
12. Foreclosure actions should be ended by the Clerk of Court upon receipt of the Order of Foreclosure. Subsequent information, including deficiency judgments, can be added to the action after the case is ended. The Master in Equity should end the action in the MIE system upon the receipt of the Order of Foreclosure.
13. When judgment enrollment information is included in the Information for the Judgment Index Section (for example, when there is a deficiency judgment), only the parties who the judgment is for and against should be included in the Section. Subordinate parties and lienholders should not be included in the box if there is not a judgment amount specifically for or against them.
14. Form 4C is not required to be attached to Transcripts of Judgment and Confession of Judgment.



Hampton Common Pleas

Case Caption: Renee S. Beach , plaintiff, et al VS Gregory M. Parker , defendant, et al

Case Number: 2021CP2500392

Type: Order/Form 4

It is so Ordered.

s/ R. Keith Kelly - 2165

Electronically signed on 2026-02-04 11:40:52 page 9 of 9

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CASE NO. 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin
Beach, Savannah Tuten, and Seth Tuten,

PLAINTIFFS,

MOTION TO RECONSIDER

vs.

Gregory M. Parker, Gregory M. Parker,
Inc. d/b/a Parker's Corporation, Blake
Greco, Jason D'Cruz, Vicky Ward, Max
Fratoddi, Henry Rosado, and Private
Investigation Services Group, LLC,

DEFENDANTS.

YOU WILL PLEASE TAKE NOTICE that that Gregg Roman and Gravitas Synergy Solutions, LLC (hereinafter “the non-parties”) moves before this court in the above-captioned action pursuant to Rules 6 and 59(e), SCRCPP, as well as pursuant to all other applicable law, for an order that vacates, reconsiders, alters, amends, and/or clarifies the court’s order filed February 5, 2026, that denies a motion to quash and for a protective order concerning a subpoena issued by Plaintiffs on May 2, 2025 to PNC Financial Services Group (hereinafter “PNC”) regarding financial records of the non-parties.

The non-parties so move on the following grounds:

1. The February 5, 2026 (Form 4) order begins in the relevant section near bottom of page 3: “This Matter came before the Court on November 26, 2025, for a hearing upon Third Party Greg (sic.) Romans’ and Gravitas Synergy Solutions’ Motion to Quash a Subpoena issued by the Plaintiff’s for his deposition testimony.” A copy of Plaintiffs’ subpoena is attached as Exhibit B to non-parties

motion to quash that was filed May 15, 2025. It commands PNC to provide financial records, not for non-parties to “sit for his deposition.” Neither Non-parties nor PNC (upon information and belief) have been properly served with a subpoena for deposition testimony and this issue is not before the Court. The non-parties request this order be vacated, or at a minimum, altered, pursuant to Rule 59(e), SCRCP to reflect the actual scope of discovery sought in this dispute.

2. The February 5, 2026 (Form 4) continues immediately thereafter in the relevant section near bottom of page 3: “Present and appearing at the hearing were counsel for all parties and counsel for Third Party Greg (sic.) Romans’ and Gravitas Synergy Solutions.” In fact, no counsel appeared for non-parties at this hearing. The undersigned consulted with other counsel for non-parties and has confirmed this fact and as will be explained below, no notice of the motion to quash hearing was provided to the undersigned. The non-parties request the order be vacated and a hearing be scheduled for a hearing on non-parties motion to quash.
3. The non-parties did not receive notice of the November 26, 2025 motion to quash hearing. The filed motion to quash, as shown on Hampton County Public Index, did not (before the hearing) and does not (now) show a date notifying the parties when it will be heard. The Hampton County motion rosters did not (before the hearing) and does not (now) reflect this motion hearing. Assuming the Court believes that the undersigned should have received notice of the hearing in question from an email exchange that occurred around the time of this hearing, it is attached as exhibit A to this motion.

- i. Kindly note the original prompt of this email exchange seeking a hearing from Mr. Bannister: "...The Discovery deadlines is fast approaching and, among other items, there is a Motion to Quash the deposition of a key witness that was recently filed. Addressing all motions pending and additional motions that are likely to be filed this week will probably take ½ day." The non-parties were subject to a deadline fast approaching, were not the key witness motion that was recently filed and did not anticipate filing any additional motions. It did not seem as though non-parties' motion was the subject of the need for motions hearing in such short order.
- ii. Please then note a November 20 reply from Mr. Bannister: "I have included counsel for Mandy Matney, the non-party witness, that filed a Motion to Quash that we wish to address." Exhibit A 4. Again, it seemed to the undersigned that non-parties motion was not a part of the motions sought to be (or actually schedule to be) heard on November 26, 2025.
- iii. The undersigned understood he was likely added to this set of emails not as counsel for non-parties, but instead as counsel for Defendants Private Investigation Services Group, LLC, Henry Rosado and Max Frattodi. The undersigned was relieved as counsel for these defendants in Spring 2025, but the proposed order relieving him as counsel (e-filed May 14, 2025)¹ for these Defendants has yet to be signed.

¹ This is not oldest filing of the undersigned that has not been decided in this matter. Please see Defendants' motion for summary judgment, filed August 25, 2022.

- iv. Finally, assuming the Court indicates the undersigned possessed constructive knowledge of this motion hearing by virtue of the email exchange, it was not proper notice under Rule 6(d), SCRCRCP, where the email exchange begins less than ten days before November 26, 2025 hearing. (“A written motion other than one which may be heard *ex parte*, and notice of the hearing thereof, shall be served not later than ten days before the time specified for the hearing, unless a different period is fixed by these rules or by an order of the court.” Rule 6(d), SCRCRCP, emphasis added.)
 - v. The non-parties request the order be vacated and a hearing be scheduled for a hearing on non-parties motion to quash.
4. The Court’s order also provides (on Page 4) that “[a]fter consideration of the filings of the parties, the pleadings, and arguments presented by counsel at the hearing,” the Court denies non-parties motion. As stated above, no arguments of counsel for non-parties occurred at the hearing. The non-parties request the order be vacated and a hearing be scheduled for a hearing on non-parties motion to quash.
5. The Court’s order finishes “[f]urthermore, the Court also **denies** Greg (sic.) Romans’ and Gravitas Synergy Solutions Alternative Motion for Protective Order because this Court finds good cause has not been shown.” (emphasis in original) The Public Index for this matter does not reflect any countering affidavits to non-parties affidavit in support of the motion to quash, there does not appear to be any evidence or testimony refuting this affidavit taken in at the

hearing, and the Order is silent on findings or conclusions regarding how the motion or affidavit doesn't meet good cause.

6. Regardless of the weight of the evidence in support of non-parties motion to quash, the Court has misunderstood how good cause is established in a case where a privilege is asserted. *See* Rule 26, SCRCR. The Court correctly identified the statute providing the privilege and cites appropriately to Matter of Decker, 322 S.C. 215, 471 S.E.2d 462 (1995), but then fails to apply the test outlined in that authority for how the privilege was overcome. "[A] court may compel testimony or disclosure of information if the party seeking it shows (1) the information is highly material and relevant; (2) cannot be reasonably obtained by alternative means; and (3) necessary to the proper preparation or presentation of the case." Id. It was error to find that this privilege was overcome by Plaintiffs where the subpoena was issued to the financial institution of these non-parties and sought not information concerning any party, claim, or defense to this matter. The privilege attaches, good cause was appropriately illustrated, and the order should be vacated and a hearing be scheduled for a hearing on these non-parties' motion to quash.
7. This motion is also based upon all applicable statutory law, case law, common law, and the complaint in this action, as well as any memoranda that Dyar may submit.

The undersigned has not attempted to reach Plaintiff's counsel to discuss the subject matter of this motion as it would be futile to do so.

[signature next page]

Respectfully submitted,

s/ Taylor Smith
Taylor M. Smith IV
S.C. Bar No. 101584
MERIWETHER LAW, LLC
923 Calhoun Street
Columbia, South Carolina 29201
(803) 779-2211
taylor@meriwetherfirm.com
ATTORNEY FOR GREGG ROMAN &
GRAVITAS SYNERGY SOLUTIONS,
LLC

Columbia, South Carolina
February 11, 2026

RE: Renee S. Beach, plaintiff, et al. vs. Gregory, defendant, et al [IMAN-NPDOCUMENTS.FID17518047]

From Rhett D. Ricard <rricard@maynardnexsen.com>

Date Thu 11/20/2025 4:46 PM

To Jim Bannister <JBannister@bannisterwyatt.com>; Kelly, R. Keith Law Clerk (Anthony Sita) <kkellylc@sccourts.org>; Lindahl, Rebecca K. <rebecca.lindahl@katten.com>

Cc Tabor Vaux <tabor.vaux@vmblawfirm.com>; Mark Tinsley <mark@goodingandgooding.com>; jgrantland@murphygrantland.com <jgrantland@murphygrantland.com>; john@bluesteinattorneys.com <john@bluesteinattorneys.com>; Mark C. Moore <MMoore@maynardnexsen.com>; Debbie Barbier (dbb@deborahbarbier.com) <dbb@deborahbarbier.com>; Markley Dennis Jr. <mdennis@maynardnexsen.com>; lisa.suckow@vmblawfirm.com <lisa.suckow@vmblawfirm.com>; Susan P. McWilliams <SMcWilliams@maynardnexsen.com>; jlyles@murphygrantland.com <jlyles@murphygrantland.com>; drew@radekerlaw.com <drew@radekerlaw.com>; Taylor Smith <Taylor@meriwetherfirm.com>; Teich, Jordan N. <jteich@csvl.law>; Alex Stalvey <AStalvey@bannisterwyatt.com>; meredith@bannonlawgroup.com <meredith@bannonlawgroup.com>; Smith, Hannah E. <hsmith@csvl.law>

All: Copying counsel for Ms. Hannah Betsill Jones for their situational awareness.

Respectfully,

Rhett D. Ricard

Shareholder | Complex Litigation | Labor & Employment

P: (843) 720-1707

RRicard@maynardnexsen.com

205 King Street Suite 400

Charleston, South Carolina 29401



From: Jim Bannister <JBannister@bannisterwyatt.com>

Sent: Thursday, November 20, 2025 4:17 PM

To: Kelly, R. Keith Law Clerk (Anthony Sita) <kkellylc@sccourts.org>; Lindahl, Rebecca K. <rebecca.lindahl@katten.com>

Cc: Tabor Vaux <tabor.vaux@vmblawfirm.com>; Mark Tinsley <mark@goodingandgooding.com>; jgrantland@murphygrantland.com; john@bluesteinattorneys.com; Mark C. Moore <mmoore@maynardnexsen.com>; Debbie Barbier (dbb@deborahbarbier.com) <dbb@deborahbarbier.com>; Markley Dennis Jr. <mdennis@maynardnexsen.com>; lisa.suckow@vmblawfirm.com; Susan P. McWilliams <smcwilliams@maynardnexsen.com>; jlyles@murphygrantland.com; drew@radekerlaw.com; taylor@meriwetherfirm.com; Rhett D. Ricard <rricard@maynardnexsen.com>; Alex Stalvey

<AStalvey@bannisterwyatt.com>; meredith@bannonlawgroup.com
Subject: RE: Renee S. Beach, plaintiff, et al. vs. Gregory, defendant, et al

Anthony,

Counsel for Defendants will be prepared for November 26, 2025 at 9:00 a.m. in person at the Spartanburg County Court House.
 Thank you.

Jim

BANNISTER, WYATT & STALVEY, LLC
 ATTORNEYS AT LAW



James W. Bannister
 PO Box 10007 (29603)
 24 Cleveland St., Suite 100 (29601)
 Greenville, SC

p (864) 298-0084
 f (864) 298-0146
www.bannisterandwyatt.com

This transmission is intended only for the proper recipient(s). It is confidential and may contain attorney-client privileged information. If you are not the proper recipient, please notify the sender immediately and delete this message. Any unauthorized review, copying, or use of this message is prohibited.

From: Kelly, R. Keith Law Clerk (Anthony Sita) <kkellylc@sccourts.org>
Sent: Thursday, November 20, 2025 10:48 AM
To: Lindahl, Rebecca K. <rebecca.lindahl@katten.com>; Jim Bannister <JBannister@bannisterwyatt.com>
Cc: Tabor Vaux <tabor.vaux@vmbllawfirm.com>; Mark Tinsley <mark@goodingandgooding.com>;
jgrantland@murphygrantland.com; john@bluesteinattorneys.com; Mark C. Moore
 <mmoore@maynardnexsen.com>; Debbie Barbier (dbb@deborahbarbier.com) <dbb@deborahbarbier.com>;
mdennis@maynardnexsen.com; lisa.suckow@vmbllawfirm.com; Susan P. McWilliams
 <smcwilliams@maynardnexsen.com>; jlyles@murphygrantland.com; drew@radekerlaw.com;
taylor@meriwetherfirm.com; Rhett D. Ricard <rricard@maynardnexsen.com>; Alex Stalvey
 <AStalvey@bannisterwyatt.com>; meredith@bannonlawgroup.com
Subject: | External | RE: Renee S. Beach, plaintiff, et al. vs. Gregory, defendant, et al

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you all for your responses. In consideration of everyone's requests, Judge Kelly is amenable to scheduling this hearing for Wednesday, November 26 at 9:00 AM at the Spartanburg County courthouse. While appearing in-person is preferred, appearing virtually is also acceptable.

Please note that Judge Kelly has another proceeding which he must preside over in Union at 2:00 PM on the 26th.

If I may be of any further assistance, please let me know.

Kind Regards,

Anthony J. Sita

Law Clerk to the Honorable R. Keith Kelly

South Carolina 16th Judicial Circuit Court
180 Magnolia St., Spartanburg, SC 29306
Office: 864-596-2400

From: Lindahl, Rebecca K. <rebecca.lindahl@katten.com>

Sent: Thursday, November 20, 2025 10:10 AM

To: Bannister, James W. <jbannister@bannisterwyatt.com>; Kelly, R. Keith Law Clerk (Anthony Sita) <kkellylc@sccourts.org>; keithkellyj@sccourts.org

Cc: Tabor Vaux <tabor.vaux@vmblawfirm.com>; Mark Tinsley <mark@goodingandgooding.com>; jgrantland@murphygrantland.com; john@bluesteinattorneys.com; Mark C. Moore <mmoore@maynardnexsen.com>; Debbie Barbier (<dbb@deborahbarbier.com> <dbb@deborahbarbier.com>; mdennis@maynardnexsen.com; lisa.suckow@vmblawfirm.com; Susan P. McWilliams <smcwilliams@maynardnexsen.com>; jlyles@murphygrantland.com; drew@radekerlaw.com; taylor@meriwetherfirm.com; Rhett D. Ricard <rricard@maynardnexsen.com>; Alex Stalvey <AStalvey@bannisterwyatt.com>; meredith@bannonlawgroup.com

Subject: Re: Renee S. Beach, plaintiff, et al. vs. Gregory, defendant, et al

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

I apologize, but I have a dental appointment on November 25 that I really shouldn't postpone. I could do a virtual hearing that morning, or I could Monday November 24 in person.

From: Jim Bannister <JBannister@bannisterwyatt.com>

Sent: Thursday, November 20, 2025 10:03:44 AM

To: Kelly, R. Keith Law Clerk (Anthony Sita) <kkellylc@sccourts.org>; keithkellyj@sccourts.org <keithkellyj@sccourts.org>

Cc: Tabor Vaux <tabor.vaux@vmblawfirm.com>; Mark Tinsley <mark@goodingandgooding.com>; jgrantland@murphygrantland.com <jgrantland@murphygrantland.com>; john@bluesteinattorneys.com <john@bluesteinattorneys.com>; Mark C. Moore <mmoore@maynardnexsen.com>; Debbie Barbier (<dbb@deborahbarbier.com> <dbb@deborahbarbier.com>; mdennis@maynardnexsen.com <mdennis@maynardnexsen.com>; lisa.suckow@vmblawfirm.com <lisa.suckow@vmblawfirm.com>; Susan P. McWilliams <smcwilliams@maynardnexsen.com>; jlyles@murphygrantland.com <jlyles@murphygrantland.com>; drew@radekerlaw.com <drew@radekerlaw.com>; taylor@meriwetherfirm.com <taylor@meriwetherfirm.com>; Rhett D. Ricard <rricard@maynardnexsen.com>; Alex Stalvey <AStalvey@bannisterwyatt.com>; Lindahl, Rebecca K. <rebecca.lindahl@katten.com>; meredith@bannonlawgroup.com <meredith@bannonlawgroup.com>

Subject: RE: Renee S. Beach, plaintiff, et al. vs. Gregory, defendant, et al

EXTERNAL EMAIL – EXERCISE CAUTION

Judge,

After consulting with counsel for the Defendants, we would request that the hearing take place on Tuesday, November 25. We can make ourselves available on Wednesday, November 26, in the morning hours, if necessary.

I have included counsel for Mandy Matney, the non-party witness, that filed a Motion to Quash that we wish to address.

Do you anticipate this being a virtual courtroom event or would we need to be present at the Spartanburg Courthouse? It would be our preference for the hearing to be in-person, but we would rather go forward virtually than postpone getting the motions heard.

Thanks in advance.

Jim



James W. Bannister
PO Box 10007 (29603)
24 Cleveland St., Suite 100 (29601)
Greenville, SC

p (864) 298-0084
f (864) 298-0146
www.bannisterandwyatt.com

This transmission is intended only for the proper recipient(s). It is confidential and may contain attorney-client privileged information. If you are not the proper recipient, please notify the sender immediately and delete this message. Any unauthorized review, copying, or use of this message is prohibited.

From: Kelly, R. Keith Law Clerk (Anthony Sita) <kkellylc@sccourts.org>
Sent: Wednesday, November 19, 2025 3:00 PM
To: Jim Bannister <JBannister@bannisterwyatt.com>; kkellyj@sccourts.org
Cc: Tabor Vaux <tabor.vaux@vmblawfirm.com>; Mark Tinsley <mark@goodingandgooding.com>;
jgrantland@murphygrantland.com; john@bluesteinattorneys.com; Mark C. Moore
<mmoore@maynardnexsen.com>; Debbie Barbier (dbb@deborahbarbier.com) <dbb@deborahbarbier.com>;
mdennis@maynardnexsen.com; lisa.suckow@vmblawfirm.com; Susan P. McWilliams
<smcwilliams@maynardnexsen.com>; jlyles@murphygrantland.com; drew@radekerlaw.com;
taylor@meriwetherfirm.com
Subject: | External | RE: Renee S. Beach, plaintiff, et al. vs. Gregory, defendant, et al

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon Mr. Bannister and Everyone,

We have availability all day Monday, October the 24th, Tuesday the 25th and the morning of the 26th. Will any of these dates work for everyone? Judge Kelly has limited availability the week of December 1st to hear this matter. Please advise at your earliest convenience.

Kind Regards,

Anthony J. Sita

Law Clerk to the Honorable R. Keith Kelly

South Carolina 16th Judicial Circuit Court
180 Magnolia St., Spartanburg, SC 29306

From: Jim Bannister <JBannister@bannisterwyatt.com>

Sent: Tuesday, November 18, 2025 3:56 PM

To: Kelly, R. Keith Law Clerk (Anthony Sita) <kkellylc@sccourts.org>; kkellyj@sccourts.org

Cc: Tabor Vaux <tabor.vaux@vmblawfirm.com>; Mark Tinsley <mark@goodingandgooding.com>; jgrantland@murphygrantland.com; john@bluesteinattorneys.com; Mark C. Moore <mmoore@maynardnexsen.com>; Debbie Barbier (dbb@deborahbarbier.com) <dbb@deborahbarbier.com>; mdennis@maynardnexsen.com; lisa.suckow@vmblawfirm.com; Susan P. McWilliams <smcwilliams@maynardnexsen.com>; jlyles@murphygrantland.com; drew@radekerlaw.com; taylor@meriwetherfirm.com

Subject: Renee S. Beach, plaintiff, et al. vs. Gregory, defendant, et al

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Judge Kelly,

I am writing to ask if you can give us some time for pending motions the week of December 1, 2025, or as soon thereafter as possible. The Discovery deadline is fast approaching and, among other items, there is a Motion to Quash the deposition of a key witness that was recently filed. Addressing all motions pending and additional motions that are likely to be filed this week will probably take a ½ day.

I have done my best to copy all attorneys on this email, if I missed anyone it was unintentional.

Thank you in advance,

Jim

BANNISTER, WYATT & STALVEY, LLC
ATTORNEYS AT LAW



James W. Bannister
PO Box 10007 (29603)
24 Cleveland St., Suite 100 (29601)
Greenville, SC

p (864) 298-0084

f (864) 298-0146

www.bannisterandwyatt.com

This transmission is intended only for the proper recipient(s). It is confidential and may contain attorney-client privileged information. If you are not the proper recipient, please notify the sender immediately and delete this message. Any unauthorized review, copying, or use of this message is prohibited.

CAUTION: Always verbally confirm wiring instructions by phone before sending funds.

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read,

copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**CAUTION:** Always verbally confirm wiring instructions by phone before sending funds.

=====

CONFIDENTIALITY NOTICE:

This electronic mail message and any attached files contain information intended for the exclusive use of the individual or entity to whom it is addressed and may contain information that is proprietary, privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any viewing, copying, disclosure or distribution of this information may be subject to legal restriction or sanction. Please notify the sender, by electronic mail or telephone, of any unintended recipients and delete the original message without making any copies.

=====

NOTIFICATION: Katten Muchin Rosenman LLP is an Illinois limited liability partnership that has elected to be governed by the Illinois Uniform Partnership Act (1997).

=====

**CAUTION:** Always verbally confirm wiring instructions by phone before sending funds.

Confidentiality Notice - The information contained in this e-mail and any attachments to it is intended only for the named recipient and may be legally privileged and include confidential information. If you are not the intended recipient, be aware that any disclosure, distribution or copying of this e-mail or its attachments is prohibited. If you have received this e-mail in error, please notify the sender immediately of that fact by return e-mail and permanently delete the e-mail and any attachments to it. Thank you.

## FORM 4

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

## JUDGMENT IN A CIVIL CASE

CASE NO. 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten and Seth TutenGregory M. Parker, Gregory M. Parker, Inc.,  
d/b/a Parker's Corporation, Black Greco, Jason  
D.Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: Circuit Court

Attorney for : ☐ Plaintiff ☐ Defendant  
or  
☐ Self-Represented Litigant

## 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. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCP; ☐ 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 came on for review before the Honorable R. Keith Kelly upon Gregg Roman's and Gravitas Solutions, LLC's Motion to Reconsider the Court's Order entered on February 5, 2026, denying their Motion to Quash and for a Protective Order concerning a subpoena issued by Plaintiff's on May 2, 2025 to PNC Financial Services Group. In lieu of oral arguments, the parties submitted filings and briefs in support of their respective positions.

This Court has reviewed the pleadings, along with the record, prior filings, and evidence presented at the November 26, 2025 hearing date, along with the applicable law and finds that the motion does not present any newly discovered evidence, manifest errors of law or fact, or an intervening change in controlling law that would warrant relief under SCRCP Rule 59(e).

AND IT APPEARING TO THE COURT that after considering the documents of record, the Motion, and reviewing the arguments of counsel, the Court finds that the Court's Order is sufficient and the Motion should be denied;

NOW, THEREFORE, and based upon the foregoing, it is ORDERED as follows:

1. Gregg Roman's and Gravitas Solutions, LLC's Motion to Reconsider filed on February 11, 2026, is hereby **DENIED**.

IT IS SO ORDERED.

**ORDER INFORMATION**

This order ☐ ends ☒ does not end the case.

Additional Information for the Clerk :

| INFORMATION FOR THE JUDGMENT INDEX                                                                                                                                                                           |                                          |                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------|
| Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below. |                                          |                                                             |
| Judgment in Favor of<br>(List name(s) below)                                                                                                                                                                 | Judgment Against<br>(List name(s) below) | Judgment Amount To be<br>Enrolled<br>(List amount(s) below) |
| N/A                                                                                                                                                                                                          |                                          | \$                                                          |
|                                                                                                                                                                                                              |                                          | \$                                                          |
|                                                                                                                                                                                                              |                                          | \$                                                          |
| If applicable, describe the property, including tax map information and address, referenced in the order:                                                                                                    |                                          |                                                             |

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk.

**Note: Title abstractors and researchers should refer to the official court order for judgment details.**

**E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.**

\_\_\_\_\_  
Circuit Court Judge

\_\_\_\_\_  
Judge Code

\_\_\_\_\_  
Date

**For Clerk of Court Office Use Only**

This judgment was entered on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and a copy mailed first class or placed in the appropriate attorney's box on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ to attorneys of record or to parties (when appearing pro se) as follows:

\_\_\_\_\_  
ATTORNEY(S) FOR THE PLAINTIFF(S)

\_\_\_\_\_  
ATTORNEY(S) FOR THE DEFENDANT(S)

\_\_\_\_\_  
CLERK OF COURT

**Court Reporter:**

**E-Filing Note: In E-Filing counties, 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 judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.**

ELECTRONICALLY FILED - 2026 Mar 16 4:16 PM - HAMPTON - COMMON PLEAS - CASE#2021CP2500392

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

**FORM 4C INSTRUCTIONS—JUDGMENT IN A CIVIL CASE**  
**(Instructions for Information Only-Not to be filed with Form 4C)**

1. Form 4C-Judgment in a Civil Case has been modified to add order information and enrollment instructions for the clerk of court. The purpose of Form 4 has not changed with the exception that judgment information is provided when applicable.
2. Please note that the Form 4C must be attached to all orders that include information to enroll in the judgment index. The clerk will not be responsible for reading the order to determine enrollment information.

The attorney or prevailing party will prepare and attach the Form 4C when submitting the proposed order that includes judgment enrollment information for the judgment index. The judge will review and sign Form 4C when he or she signs an order that includes judgment enrollment information for the judgment index.

3. Form 4C is not required to be submitted to the Court with orders that do not include information to enroll in the judgment index. If the clerk receives such an order without Form 4C attached, the clerk should enter and process the order pursuant to Rule 58 and Rule 77(d), SC Rules of Civil Procedure (i.e., the clerk should serve notice of entry of the judgment by mail or provide the attorneys with copies of the signed order by other means).
4. The “Information for the Judgment Index” section should be completed when the judgment affects title to real or personal property or if any amount should be enrolled. In the “Judgment in Favor of” column, enter the name of the party to whom the judgment is awarded. In the “Judgment Against” column, enter the name of the person to whom the judgment is against. The judgment amount to be enrolled should be noted in the “Judgment Amount” column. As necessary, describe any property referenced in the order if it is to be enrolled in the judgment index. If there is no judgment information to enroll, indicate “N/A” in one of the boxes in this section of the form.
5. To enter information to accommodate multiple parties, additional Form 4Cs may be used as necessary. Additional space may be inserted on the form as necessary.
6. The section “For the Clerk of Court Office Use Only” should be completed by the clerk as it has been with the previous version of Form 4.
7. If the matter is on appeal to the Circuit Court, then the parties on the form should be changed from Plaintiff and Defendant to Appellant and Respondent.
8. If an arbitrator prepares an order after arbitration, the arbitrator should strike through “Circuit Court Judge” and indicate “Arbitrator” in the signature block.

9. If a Special Circuit Court Judge, Master in Equity, or Special Referee prepares an order after hearing a Circuit Court matter, then he or she should strike through the title "Circuit Court Judge" below the signature line and indicate the appropriate title.
10. When an Order of Foreclosure is filed, neither the parties or debt owed should be listed in the Information for the Judgment Index Section, unless the foreclosure order specifically requires entry of the full judgment amount before the foreclosure sale, pursuant to Section 29-3-650 of the SC Code.
11. If the deficiency judgment is waived in a Foreclosure action, indicate N/A in the "Judgment Amount To Be Enrolled" box.
12. Foreclosure actions should be ended by the Clerk of Court upon receipt of the Order of Foreclosure. Subsequent information, including deficiency judgments, can be added to the action after the case is ended. The Master in Equity should end the action in the MIE system upon the receipt of the Order of Foreclosure.
13. When judgment enrollment information is included in the Information for the Judgment Index Section (for example, when there is a deficiency judgment), only the parties who the judgment is for and against should be included in the Section. Subordinate parties and lienholders should not be included in the box if there is not a judgment amount specifically for or against them.
14. Form 4C is not required to be attached to Transcripts of Judgment and Confession of Judgment.



Hampton Common Pleas

**Case Caption:** Renee S. Beach , plaintiff, et al VS Gregory M. Parker , defendant, et al

**Case Number:** 2021CP2500392

**Type:** Order/Form 4

It is so Ordered.

s/ R. Keith Kelly - 2165

Electronically signed on 2026-03-13 14:19:57 page 6 of 6

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiff,

v.

**DEFENDANTS' MOTION FOR RULE TO  
SHOW CAUSE REGARDING GREGG  
ROMAN'S FAILURE TO APPEAR FOR  
DEPOSITION**Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC,

Defendant.

Pursuant to Rule 45(e) of the South Carolina Rules of Civil Procedure, Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, (hereinafter "these Defendants"), by and through their undersigned counsel, move the Court to issue a Rule to Show Cause due to Gregg Roman's failure to appear for his properly noticed deposition.

On November 11, 2025, these Defendants first served a subpoena on Mr. Roman for the taking of his deposition on December 11, 2025. (Exhibit A). Since that time, Mr. Roman has continually evaded judicial process and avoided his deposition, despite having counsel appear for him and participate in litigation on other issues. Counsel was retained for Mr. Roman, and a letter was sent by that counsel on January 6, 2026. (Exhibit B). In that letter, Mr. Roman disputes the validity of the subpoena but misrepresents the law and facts surrounding the case. Defendants would contend that the subpoena was properly served.

Notably, Mr. Roman seemingly acknowledges receipt of the subpoena but continues to evade his deposition due to claims of insufficiency of service of process and potential safety

concerns. As has been previously argued to this Court, those supposed concerns are without merit, as Defendant has offered a remote deposition and tried to accommodate any concerns. (Exhibit C).

Since that time, Defendant has continually attempted to work with counsel for Mr. Roman to secure his deposition. Recently, Attorney Taylor Smith has appeared and filed a Motion to Reconsider this Court's Order on a subpoena on behalf of Gregg Roman and Gravitas Synergy Solutions. Attorney Smith filed the said motion despite the fact that he filed the original answer on behalf of these Defendants and is still listed as counsel of record for these Defendants. Due to his appearance, these Defendants then served him with a deposition notice on February 16, 2026, as counsel for Gregg Roman. (Exhibit D). Mr. Roman again did not appear for his deposition, and Attorney Smith now claims that he is not authorized to accept service on behalf of his client, despite the fact that he has appeared and is voluntarily participating in the litigation. (Exhibit E).

Based on the above showing, these Defendants respectfully request this Court issue a Rule to Show Cause ordering appearance of Gregg Roman to demonstrate why he should not be held in contempt of Court for failure to respond to a properly issued and served subpoena.

**MURPHY & GRANTLAND, P.A.**

*s/John M. Grantland*

---

John M. Grantland, Esquire

S.C. Bar No. 64158

P.O. Box 6648

Columbia, SC 29260

T: 803-782-4100

F: 803-782-4140

[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)

*Attorneys for Defendants Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC*

Columbia, South Carolina  
March 23, 2026

November 11, 2025

**VIA PROCESS SERVER**

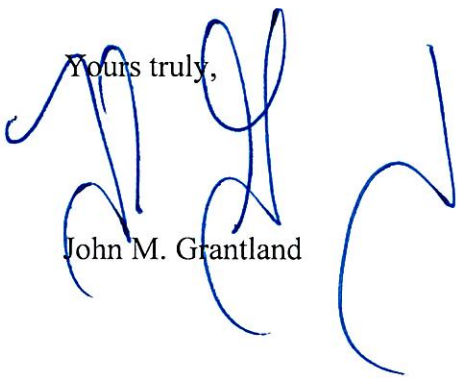
Gregg Roman  
144 N Narberth Ave, Appt 442  
Narberth, PA 19072

Re: Beach, Renee, et al v. Parker, Gregory et al  
Civil Action No.: 2021-CP-25-00392  
Claim No.: CP2107161  
Our File No.: 1352-0005

Dear Mr Roman:

Enclosed please find a subpoena for the taking of your deposition with regard to the above-referenced case, which I am serving upon you by mail. Please note that your deposition will take place on Thursday, December 11, 2025, beginning at 10:00 a.m., at the law offices of Chartwell Law, 130 N. 18<sup>th</sup> Street, Suite 1200, Philadelphia, Pennsylvania, 19103. Also enclosed is a courtesy copy of your deposition notice.

Yours truly,

  
John M. Grantland

JMG/rld  
Enclosure

cc: Mark B. Tinsley, Esquire  
John S. Nichols, Esquire  
Roberts Tabor Vaux, Jr., Esquire  
Mark C. Moore, Esquire  
Rhett D. Ricard, Esquire  
Deborah B. Barbier, Esquire

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC,

Defendants.

**NOTICE OF DEPOSITION  
OF GREGG ROMAN**

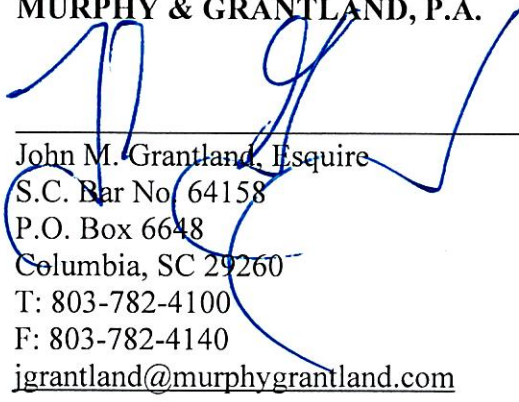
**TO: MARK B. TINSLEY, ESQUIRE, R. TABOR VAUX, JR., ESQUIRE, AND JOHN S. NICHOLS, ESQUIRE, ATTORNEYS FOR PLAINTIFFS, AND TO THE PLAINTIFFS ABOVE NAMED:**

YOU WILL PLEASE TAKE NOTICE that Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, will take the deposition of **Gregg Roman** at the offices of Chartwell Law, 130 N. 18th Street, Suite 1200, Philadelphia, Pennsylvania, 19103, on Thursday, December 11, 2025, at 10:00 a.m., upon oral examination before a Notary Public for South Carolina or some other officer authorized by law to administer oaths. The oral examination shall continue from time to time and day to day until completed, including any adjournments thereof.

**You are hereby notified, and you are further invited to attend and participate.**

*(signature on following page)*

**MURPHY & GRANTLAND, P.A.**



---

John M. Grantland, Esquire

S.C. Bar No. 64158

P.O. Box 6648

Columbia, SC 29260

T: 803-782-4100

F: 803-782-4140

[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)

*Attorneys for Defendants Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC*

Columbia, South Carolina  
November 11, 2025

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco,  
Jason D'Cruz, Vicky Ward, Max Fratoddi,  
Henry Rosado, and Private Investigation  
Services Group, LLC,

Defendants.

**CERTIFICATE OF SERVICE**

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., attorneys for Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, do hereby certify that I have served a copy of the foregoing, **Notice of Deposition of Gregg Roman**, in connection with the above-referenced case by e-mailing and mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

Mark B. Tinsley, Esquire  
Gooding & Gooding, P.A.  
Post Office Box 1000  
Allendale, SC 29810  
[mark@goodingandgooding.com](mailto:mark@goodingandgooding.com)

John S. Nichols, Esquire  
Bluestein Thompson Sullivan, LLC  
Post Office Box 7965  
Columbia, SC 29202  
[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)

Roberts "Tabor" Vaux, Jr., Esquire  
Vaux, Marscher, Berglind, PA  
Post Office Box 769  
Bluffton, SC 29910  
[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)

Mark C. Moore, Esquire  
Rhett D. Ricard, Esquire  
Maynard Nexsen, P.C.  
1230 Main Street, Suite 700  
Columbia SC 29201  
[mmore@maynardnexsen.com](mailto:mmore@maynardnexsen.com)  
[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)

Deborah B. Barbier, Esquire  
Deborah B. Barbier, LLC  
1811 Pickens Street  
Columbia, SC 29201  
[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)

A handwritten signature in blue ink, appearing to read "Renee L. Dillon", written over a horizontal line.

Renee L. Dillon

Columbia, South Carolina  
November 11, 2025

**STATE OF SOUTH CAROLINA**

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF HAMPTON

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten, Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC, Defendants.SUBPOENA IN A CIVIL CASE  
Case Number: 2021-CP-25-00392

Pending in Hampton County

TO: **Gregg Roman, 144 N Narberth Ave, Appt 442, Narberth, PA 19072**☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

|                    |                 |
|--------------------|-----------------|
| PLACE OF TESTIMONY | COURTROOM       |
|                    | DATE AND TIME , |

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

|                                                                                                                                 |                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| PLACE OF DEPOSITION<br><b>Chartwell Law</b><br><b>130 N. 18<sup>th</sup> Street, Suite 1200</b><br><b>Philadelphia PA 19103</b> | DATE AND TIME<br><b>Thursday, December 11, 2025</b><br><b>10:00 a.m.</b> |
|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects:

|       |               |
|-------|---------------|
| PLACE | DATE AND TIME |
|-------|---------------|

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

|          |                 |
|----------|-----------------|
| PREMISES | DATE AND TIME , |
|----------|-----------------|

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

|                                                                                                                                                                                                                                                                |                       |                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------------------|
| Attorney/Issuing Officer's Signature<br>Indicate if Attorney for Plaintiff or Defendant<br>Attorney's Address and Telephone Number :<br><b>Attorney for Defendants Fratoddi, Rosado, and PISG LLC</b><br>4406-B Forest Drive, Columbia, SC 29206, 803-782-4100 | Nov. 11, 2025<br>Date | John M. Grantland, Esquire<br>Print Name |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------------------|

|                                                                                                      |      |            |
|------------------------------------------------------------------------------------------------------|------|------------|
| Clerk of Court/Issuing Officer's Signature<br>Pro Se Litigant's Name, Address and Telephone Number : | Date | Print Name |
|------------------------------------------------------------------------------------------------------|------|------------|

## PROOF OF SERVICE

|           |       |                                                                                                                         |
|-----------|-------|-------------------------------------------------------------------------------------------------------------------------|
| SERVED    | DATE  | FEES AND MILEAGE TENDERED TO WITNESS<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   AMOUNT \$ |
|           | PLACE |                                                                                                                         |
| SERVED ON |       | MANNER OF SERVICE                                                                                                       |
| SERVED BY |       | TITLE                                                                                                                   |

## DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on \_\_\_\_\_

SIGNATURE OF SERVER

Murphy & Grantland, PA, PO Box 6648, Columbia SC 29260  
ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

**(c) Protection of Persons Subject to Subpoenas.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

- i. fails to allow reasonable time for compliance; or
- ii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or
- iii. requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or
- iv. subjects a person to undue burden.

**(B) If a subpoena:**

- i. requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- ii. requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- iii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) Duties in Responding to Subpoena.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

January 6, 2026

VIA EMAIL JGRANTSTRINGHAM@CHARTWELLLAW.COM

**Arianna K. McLaughlin**

Direct Phone 215-665-2143

Direct Fax 267-507-1564

amclaughlin@cozen.com

J. Grant Stringham, Esquire  
Chartwell Law

**Re: Subpoena to Gregg Roman in *Beach et al. v. Park et al.***

Mr. Stringham,

I write on behalf of Gregg Roman regarding a subpoena you claim to have served in the above-referenced matter. The subpoena is procedurally and substantively improper. It suffers fatal defects with respect to service, jurisdiction, burden, and privilege, each of which independently foreclose any deposition of Mr. Roman. We urge you to withdraw any subpoena you claim to have served to avoid unnecessary motion practice and the possibility of sanctions.

**I. Faulty Service Attempts Are Not a Basis to Threaten Mr. Roman with a Bench Warrant**

The Pennsylvania Rules of Civil Procedure require you to properly serve Mr. Roman. You have not done so. As described in a letter from Mr. Scott Sholder dated December 9, 2025, the December 5, 2025, service attempt was deficient. Among other issues, the location was not Mr. Roman's regular place of business and the person purportedly served, Al Manning, is not Mr. Roman's agent or otherwise authorized to accept service on his behalf. To that end, the representation in the Proof of Service that Mr. Manning was authorized to accept service is false. The subpoena is also unenforceable because it failed to provide reasonable notice of the deposition and did not tender the requisite witness and mileage fees. See Pa.R.C.P. 234.2(c); Pa.R.C.P. 4007.1(a).

Nor have you properly served Mr. Roman since December 5, 2025. During our December 30, 2025, call, you represented that you attempted to serve Mr. Roman on December 29, 2025, at his "home" in Pennsylvania, but that his "wife" denied service. That representation cannot be true. Neither Mr. Roman nor his wife were present in the United States at that time, as they moved to Israel in June 2025. Nor does Mr. Roman own, rent, or otherwise occupy residential property in the Commonwealth. So, you are mistaken that you attempted to serve Mr. Roman (via his "wife" or otherwise) at his "home," in Pennsylvania, and any such attempt was patently defective.

Given these circumstances, there is no basis for you to threaten a bench warrant, arrest, or contempt against Mr. Roman. Indeed, the issue is not that Mr. Roman is evading a valid subpoena—as you've suggested—but that your client has failed to properly serve him in the first place. Your attempts to intimidate Mr. Roman are thus improper and fail to absolve your clients of their obligation to properly effectuate service. Moving forward, please comply with your ethical obligations and refrain from threatening criminal or disciplinary action as a means of obtaining an advantage in the civil *Beach* dispute.

## II. The Commonwealth of Pennsylvania Lacks Jurisdiction Over Mr. Roman

Even assuming proper service, Pennsylvania courts lack personal jurisdiction over Mr. Roman. Mr. Roman is the target of terroristic threats stemming from his journalistic activities on matters related to the Middle East. As such, I cannot disclose his precise location without compromising his safety. However, I have been authorized to inform you that Mr. Roman lives and works in Israel—*not* Pennsylvania. Nor does Mr. Roman own property in Pennsylvania or otherwise have sufficient minimum contacts with the Commonwealth. It would accordingly offend notions of fair play and substantial justice to hail him to court in Pennsylvania, particularly in connection with a South Carolina lawsuit that Mr. Roman is not even a party to.

Moreover, given Mr. Roman's absence from the Commonwealth, it is risible for you to claim that he is dodging service. It is abundantly clear based on publicly available resources that he is in Israel. On December 24, 2025, for example, Mr. Roman testified before the Israeli Knesset. See *Gregg Roman Testifies Before the Knesset on the Cost of Redeeming Hostages*, MIDDLE EAST FORUM (Dec. 24, 2025), available at <https://www.meforum.org/spoken/gregg-roman-testifies-before-the-knesset-on-the-cost-of-redeeming-hostages> (last accessed Jan. 5, 2026). We therefore urge you to carefully review the accuracy of any statements you have made with respect to service of Mr. Roman in the Commonwealth, and even more so if you intend on making such statements in court filings.

## III. Any Attempts to Depose Mr. Roman Are Improper and Unduly Burdensome

While no valid subpoena has been served to date, any attempt to compel Mr. Roman's testimony would further impose extraordinary burdens unjustified by the needs of the case. Any subpoena requiring Mr. Roman's deposition testimony is oppressive, unduly burdensome, and would impose needless expense on Mr. Roman in violation of Pennsylvania Rule of Civil Procedure 234.4. See Pa.R.C.P. 234.4(b); *accord* Pa.R.C.P. 4011(a)-(c) ("No discovery... shall be permitted which (a) is sought in bad faith; would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent or any person or party; (c) is beyond the scope of discovery as set forth in Rules 4003.1 through 4003.6."). Such is the case for two separate, yet equally compelling, reasons:

**First**, Mr. Roman has already filed a Motion to Quash in South Carolina that would preclude any attempts to subpoena him in connection with the *Beach* case. While the Court has yet to grant that Motion, a ruling in Mr. Roman's favor would necessarily preclude your attempt to subpoena Mr. Roman in Pennsylvania. Proceeding in Pennsylvania under these circumstances would be duplicative, improper, and contrary to the principles of comity and judicial economy.

**Second**, and as noted, Mr. Roman does not live in Pennsylvania. Rather, to appear for a deposition, Mr. Roman would need to secure costly plane tickets and travel upwards of 14 hours each way. Upon information and belief, Mr. Roman is also subject to imminent call-up in the Israel Defense Force ("IDF") reserves, which may render him unavailable for any noticed future dates as it is likely that he would serve in Gaza, or some other unstable region. The logistical and personal hardship of compelling testimony under these circumstances is manifest and precludes enforcement of any valid subpoena.

As such, even assuming proper service and personal jurisdiction—neither of which exist here—any subpoena would fail under Pennsylvania Rule of Civil Procedure 234.4. While it would

benefit both parties to avoid the time and expense of briefing these issues, Mr. Roman is ready, willing, and able to preserve his rights by responding to any subsequently issued and properly served subpoena with a motion to quash and for a protective order.

**IV. Statutory and Constitutional Privileges Foreclose Mr. Roman's Compelled Testimony**

Lastly, any attempt to meaningfully depose Mr. Roman would be futile. Pennsylvania's Shield Law, 42 Pa. Const. Stat. § 5942, affords privilege to journalists. Mr. Roman is therefore protected against the compelled disclosure of confidential sources or information that could lead to the identification of a source. This protection is absolute—there are no exceptions for civil litigation, criminal investigations, and certainly not for collateral non-party discovery in an out-of-state lawsuit. Your client is thus categorically barred from deposing Mr. Roman on these matters.

The First Amendment also independently protects information including and exceeding the scope of Pennsylvania's Shield Law. The compelled disclosure of a journalist's confidential sources, unpublished resource materials, and editorial processes has a chilling effect on newsgathering that strikes at the heart of press freedom. The First Amendment thus provides a qualified reporter's privilege, which may be overcome by only specific, demonstrated showings of relevance, materiality, necessity, unavailability by alternative means, and crucialness to the moving party's case. Your client cannot meet this exacting standard. Indeed, it is difficult to conceive of an interest substantial enough to outweigh Mr. Roman's protections and the interests protected by the First Amendment where Mr. Roman is not even a party to this lawsuit.

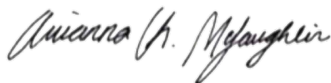
At bottom, any and all information relevant to this action that you may seek from Mr. Roman is protected by these statutory and constitutional guarantees. Any attempt to compel his testimony would contravene Pennsylvania's Shield Law and the First Amendment's reporter's privilege. We therefore respectfully suggest that you withdraw any subpoena you claim to have served and cease any further attempts to serve Mr. Roman to avoid unnecessary motion practice and judicial intervention.

**V. Conclusion**

For the foregoing reasons, your attempts to serve Mr. Roman and require his deposition are improper. Please confirm in writing that you have withdrawn any subpoena you claim to have served and that you will refrain from further service attempts. If you persist, Mr. Roman expressly reserves his rights to file objections and seek all available remedies, including, but not limited to, a protective order and sanctions.

Sincerely,

COZEN O'CONNOR



By: Arianna K. McLaughlin

AKM

cc: Scott Sholder, Esq.  
Nathan Dooley, Esq.

**From:** J. Grant Stringham  
**Sent:** Thursday, January 8, 2026 3:06 PM  
**To:** 'McLaughlin, Arianna' <[AMcLaughlin@cozen.com](mailto:AMcLaughlin@cozen.com)>; Patti Richardson <[prichardson@chartwelllaw.com](mailto:prichardson@chartwelllaw.com)>  
**Cc:** Scott Sholder <[ssholder@cdas.com](mailto:ssholder@cdas.com)>; Dooley, Nathan <[NDooley@cozen.com](mailto:NDooley@cozen.com)>  
**Subject:** Beach, Renee S, Phillip Beach, Robin Beach, Savannah Tuten and Seth Tuten v. Gregory M. Park, et al - Claim No. CP2107161: [EXTERNAL] Beach v. Park - Subpoena to Gregg Roman

Good Afternoon Ms. Mclaughlin,

I responded to your letter to offer you the option to voluntarily assist in the litigation process, which most judges prefer. Your letter misrepresents facts, misquotes a telephone conversation wherein I explained the process for enforcing subpoenas—which you are seemingly unfamiliar with (it's not a criminal proceeding)—and expressly states a motion in South Carolina to quash the pertinent subpoena for Mr. Roman's deposition was filed, though no such motion exists. The actions you are taking in coordination with your client will be reviewed by the Court, as will any further correspondence that misrepresents facts in the South Carolina case.

Respectfully, please revisit 42 Pa.C.S. § 2503 before sending additional threatening correspondence on behalf of Mr. Roman. You may also benefit from reinterviewing Mr. Roman regarding his business and personal contacts in Pennsylvania, including his decision to select Pennsylvania as governing law and Philadelphia County as venue in contract.

Regards,



J. Grant Stringham, Esquire

[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)

D: (215) 972-5468 • M: (541) 310-0614 • F: (215) 972-7008

130 N. 18th Street, Suite 1200, Philadelphia, PA 19103

This email and any files transmitted with it are personal and confidential, and intended solely for the use of the individual or entity to whom it is addressed. They are also subject to the attorney work product and attorney-client privileges. If you received this transmission in error, please notify the sender by reply email and delete the message and any attachments. Thank you.

**From:** McLaughlin, Arianna <[AMcLaughlin@cozen.com](mailto:AMcLaughlin@cozen.com)>  
**Sent:** Wednesday, January 7, 2026 10:02 PM  
**To:** J. Grant Stringham <[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)>; Patti Richardson

<[prichardson@chartwelllaw.com](mailto:prichardson@chartwelllaw.com)>

**Cc:** Scott Sholder <[ssholder@cdas.com](mailto:ssholder@cdas.com)>; Dooley, Nathan <[NDooley@cozen.com](mailto:NDooley@cozen.com)>

**Subject:** [EXTERNAL] RE: Beach, Renee S, Phillip Beach, Robin Beach, Savannah Tuten and Seth Tuten v. Gregory M. Park, et al - Claim No. CP2107161: [EXTERNAL] Beach v. Park - Subpoena to Gregg Roman

Grant,

Your response is noted and will be preserved for the Court's review should any motion practice become necessary. We address your misguided and meritless allegations below.

**Your Conspiracy Allegations Are Baseless and Improper**

Your suggestion that Mr. Roman's retention of counsel to respond to an invalid subpoena somehow constitutes evidence of "continued conspiracy and fraudulent activity" is remarkable. Mr. Roman is not a party to the underlying South Carolina litigation. He is entitled to legal representation, and the assertion that seeking representation may be wielded as evidence of wrongdoing is not only legally unfounded but appears designed to chill Mr. Roman's exercise of his rights. We trust you will reconsider this position before presenting it to any court.

**Our Letter Accurately States the Law and Facts**

You claim our correspondence "inaccurately represents the law and facts" but you identify no specific error. Please identify those alleged errors so that we may meaningfully confer. However, we believe there are none. The service defects we identified—including service upon an unauthorized individual at an incorrect location, failure to tender witness and mileage fees, and inadequate notice—are well-documented. That you have apparently doubled down on your December 29, 2025, service attempt at Mr. Roman's purported Pennsylvania "home" is particularly troubling, as Mr. Roman and his wife have resided in Israel since June 2025 and maintain no residential property in the Commonwealth. You cannot credibly allege that Mr. Roman is wrong about facts related to his own home, wife, and residence. We encourage you to investigate your process server's representations before submitting any attestation to any court.

**Mr. Roman Cannot Disclose His Address Due to Credible Safety Threats**

You request an affidavit disclosing Mr. Roman's current address. We decline. As we already clearly stated in our prior letter, Mr. Roman is the target of terroristic threats arising from his journalistic work on Middle East affairs. Publicly filing his home address—or providing it to opposing counsel in contentious litigation—would compromise his physical safety and that of his family. This is not evasion, nor is it exaggeration; it is a reasonable and necessary precaution that any court would recognize. The suggestion that Mr. Roman must endanger himself to satisfy your unfounded non-party discovery demands underscores the oppressive nature of this subpoena and your conduct in pursuing Mr. Roman overall.

**The Zoom Proposal Does Not Cure the Subpoena's Fatal Defects**

Your offer of a remote deposition is rejected. While seemingly styled as a good-faith accommodation, it addresses only the burden of international travel—one of several independent grounds precluding Mr. Roman's deposition. A Zoom deposition would not cure the defective service, the lack of personal jurisdiction over a non-party witness residing abroad, or the protections afforded by Pennsylvania's Shield Law and the First Amendment's reporter's privilege. Mr. Roman is a journalist. Any testimony you seek regarding his sources, unpublished materials, or editorial processes is categorically privileged. Remote participation does not waive these protections or cure the numerous defects outlined above and in previous correspondence. To the extent you believe there is a legal basis that permits such inquiry—or seek to explore non-privileged matters—please advise us accordingly.

**Your Threats Warrant Sanctions, Not Compliance**

You characterize threats of contempt and bench warrants as “transparent” and “professional.” They are neither. Threatening criminal process against a non-party journalist who has not been validly served—and who resides in a foreign country—is not an ethical explanation of procedure. It is improper coercion, particularly when you admit that even the mere possibility of criminal sanctions is several steps removed from where this dispute currently sits. Pennsylvania Rule of Professional Conduct 4.4 prohibits using means that have no substantial purpose other than to embarrass or burden a third person, and to the extent it is applicable given where the underlying case resides, South Carolina Rule of Professional Conduct 4.5 provides that “[a] lawyer shall not present, participate in presenting, or threaten to present criminal or professional disciplinary charges solely to obtain an advantage in a civil matter.” Your conduct falls squarely within these prohibitions.

We are documenting these communications. Should you proceed with motion practice based on your facially defective subpoena, fabricated “facts,” and meritless threats, we will seek sanctions, including attorneys’ fees, pursuant to 42 Pa.C.S. § 2503 and the Court’s inherent authority.

**Conclusion**

Mr. Roman's position remains unchanged. Withdraw your demand to depose our client and cease further attempts at serving your defective subpoena. If you decline, we will respond to any motion with the full record of your conduct and pursue all available remedies. Our client reserves all rights, remedies, claims, and defenses.

Best,  
Arianna

**Arianna McLaughlin**  
**Associate | Cozen O'Connor**  
One Liberty Place, 1650 Market  
Street Suite 2800 | Philadelphia, PA  
19103  
P: 215-665-2143 F: 267-507-1564  
[Email](#) | [Bio](#) | [Map](#) | [cozen.com](#)

**From:** J. Grant Stringham <[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)>  
**Sent:** Tuesday, January 6, 2026 4:18 PM  
**To:** McLaughlin, Arianna <[AMcLaughlin@cozen.com](mailto:AMcLaughlin@cozen.com)>  
**Cc:** Scott Sholder <[ssholder@cdas.com](mailto:ssholder@cdas.com)>; Dooley, Nathan <[NDooley@cozen.com](mailto:NDooley@cozen.com)>; Patti Richardson <[prichardson@chartwelllaw.com](mailto:prichardson@chartwelllaw.com)>  
**Subject:** RE: Beach, Renee S, Phillip Beach, Robin Beach, Savannah Tuten and Seth Tuten v. Gregory M. Park, et al - Claim No. CP2107161: [EXTERNAL] Beach v. Park - Subpoena to Gregg Roman

**\*\*EXTERNAL SENDER\*\***

Good Afternoon Ms. Mclaughlin,

Please be advised that, pursuant to the claims of civil conspiracy and fraudulent activity in the underlying South Carolina case, and your client's retention of a law firm to conceal his involvement in that case, all communications made by his representatives may be used as evidence, where relevant, to the continued conspiracy and fraudulent activity.

Kindly note your correspondence submitted on today's date inaccurately represents the law and facts surrounding the subpoena and your client's residences, places of business, and rules for effective service; however, those are for the Court to determine. If you would like to submit an affidavit from Mr. Roman containing his current address to support your representations, we are open to receiving same. Furthermore, your allegations related to ethics are unprofessional, unsupported, and inaccurate. To the contrary, being transparent and explaining the process for enforcing subpoenas after application to the court and after continued concealment by an individual is both ethical and professional. The process involves motions, requests for sanctions, then, where warranted, a request for an order of contempt and the issuance of a bench warrant. Unfortunately, your client is attempting to avoid the judicial process, which the court is unlikely to appreciate.

Finally, if you wish to make any good faith representations for the court to consider regarding the current address of Mr. Roman, or have him voluntarily participate remotely via Zoom without any travel burden, please commemorate that information via written response.

Regards,



J. Grant Stringham, Esquire

[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)

D: (215) 972-5468 • M: (541) 310-0614 • F: (215) 972-7008

130 N. 18th Street, Suite 1200, Philadelphia, PA 19103

This email and any files transmitted with it are personal and confidential, and intended solely for the use of the individual or entity to whom it is addressed. They are also subject to the attorney work product and attorney-client privileges. If you received this transmission in error, please notify the sender by reply email and delete the message and any attachments. Thank you.

**From:** McLaughlin, Arianna <[AMcLaughlin@cozen.com](mailto:AMcLaughlin@cozen.com)>

**Sent:** Tuesday, January 6, 2026 9:30 AM

**To:** J. Grant Stringham <[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)>; Patti Richardson <[prichardson@chartwelllaw.com](mailto:prichardson@chartwelllaw.com)>

**Cc:** Scott Sholder <[ssholder@cdas.com](mailto:ssholder@cdas.com)>; Dooley, Nathan <[NDDooley@cozen.com](mailto:NDDooley@cozen.com)>

**Subject:** [EXTERNAL] RE: Beach, Renee S, Phillip Beach, Robin Beach, Savannah Tuten and Seth Tuten v. Gregory M. Park, et al - Claim No. CP2107161: [EXTERNAL] Beach v. Park - Subpoena to Gregg Roman

Grant,

Please see the attached correspondence. We're available to further discuss if you have any questions or concerns.

Best,  
Arianna

**Arianna McLaughlin**  
**Associate | Cozen O'Connor**  
One Liberty Place, 1650 Market  
Street Suite 2800 | Philadelphia, PA  
19103  
P: 215-665-2143 F: 267-507-1564  
[Email](#) | [Bio](#) | [Map](#) | [cozen.com](http://cozen.com)

**From:** J. Grant Stringham <[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)>

**Sent:** Monday, December 29, 2025 5:35 PM

**To:** McLaughlin, Arianna <[AMcLaughlin@cozen.com](mailto:AMcLaughlin@cozen.com)>

**Cc:** Scott Sholder <[ssholder@cdas.com](mailto:ssholder@cdas.com)>; Dooley, Nathan <[NDDooley@cozen.com](mailto:NDDooley@cozen.com)>; Patti Richardson <[prichardson@chartwelllaw.com](mailto:prichardson@chartwelllaw.com)>

**Subject:** RE: Beach, Renee S, Phillip Beach, Robin Beach, Savannah Tuten and Seth Tuten v. Gregory M. Park, et al - Claim No. CP2107161: [EXTERNAL] Beach v. Park - Subpoena to Gregg Roman

**\*\*EXTERNAL SENDER\*\***

Good Afternoon Arianna,

Please call me tomorrow on my cell anytime after 10 a.m. Thanks.

Regards,



J. Grant Stringham, Esquire

[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)

D: (215) 972-5468 • M: (541) 310-0614 • F: (215) 972-7

130 N. 18th Street, Suite 1200, Philadelphia, PA 19103

This email and any files transmitted with it are personal and confidential, and intended solely for the use of the individual or entity to whom it is addressed. They are also subject to the attorney work product and attorney-client privileges. If you received this transmission in error, please notify the sender by reply email and delete the message and any attachments. Thank you.

**From:** McLaughlin, Arianna <[AMcLaughlin@cozen.com](mailto:AMcLaughlin@cozen.com)>

**Sent:** Monday, December 29, 2025 12:44 PM

**To:** J. Grant Stringham <[jgrantstringham@chartwelllaw.com](mailto:jgrantstringham@chartwelllaw.com)>

**Cc:** Scott Sholder <[ssholder@cdas.com](mailto:ssholder@cdas.com)>; Dooley, Nathan <[NDDooley@cozen.com](mailto:NDDooley@cozen.com)>

**Subject:** [EXTERNAL] Beach v. Park - Subpoena to Gregg Roman

Mr. Stringham,

My name is Arianna McLaughlin and I represent Mr. Roman in connection with the attached subpoena along with Cowan DeBaets Abrahams & Sheppard LLP. I was recently retained and am still getting up to speed, but do you have any time this or next week for a call?

Best,  
Arianna

**Arianna McLaughlin**  
**Associate | Cozen O'Connor**

One Liberty Place, 1650 Market  
Street Suite 2800 | Philadelphia, PA  
19103  
P: 215-665-2143 F: 267-507-1564  
[Email](#) | [Bio](#) | [Map](#) | [cozen.com](#)

***Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.***

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC,

Defendants.

**AMENDED NOTICE OF DEPOSITION  
OF GREGG ROMAN**

**TO: MARK B. TINSLEY, ESQUIRE, R. TABOR VAUX, JR., ESQUIRE, AND JOHN S. NICHOLS, ESQUIRE, ATTORNEYS FOR PLAINTIFFS, AND TO THE PLAINTIFFS ABOVE NAMED:**

YOU WILL PLEASE TAKE NOTICE that Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, will take the deposition of **Gregg Roman** at the offices of Chartwell Law, 130 N. 18th Street, Suite 1200, Philadelphia, Pennsylvania, 19103, on Thursday, February 26, 2026, at 10:00 a.m., upon oral examination before a Notary Public for South Carolina or some other officer authorized by law to administer oaths. The oral examination shall continue from time to time and day to day until completed, including any adjournments thereof. **You are hereby notified, and you are further invited to attend and participate.**

*(signature on following page)*

**MURPHY & GRANTLAND, P.A.**



---

John M. Grantland, Esquire  
S.C. Bar No. 64158  
P.O. Box 6648  
Columbia, SC 29260  
T: 803-782-4100  
F: 803-782-4140  
[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)

*Attorneys for Defendants Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC*

Columbia, South Carolina  
January 29, 2026

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco,  
Jason D'Cruz, Vicky Ward, Max Fratoddi,  
Henry Rosado, and Private Investigation  
Services Group, LLC,

Defendants.

**CERTIFICATE OF SERVICE**

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., attorneys for Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, do hereby certify that I have served a copy of the foregoing, **Amended Notice of Deposition of Gregg Roman**, in connection with the above-referenced case by e-mailing and mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

Mark B. Tinsley, Esquire  
Gooding & Gooding, P.A.  
Post Office Box 1000  
Allendale, SC 29810  
[mark@goodingandgooding.com](mailto:mark@goodingandgooding.com)

John S. Nichols, Esquire  
Bluestein Thompson Sullivan, LLC  
Post Office Box 7965  
Columbia, SC 29202  
[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)

Roberts "Tabor" Vaux, Jr., Esquire  
Vaux, Marscher, Berglind, PA  
Post Office Box 769  
Bluffton, SC 29910  
[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)

Mark C. Moore, Esquire  
Rhett D. Ricard, Esquire  
Maynard Nexsen, P.C.  
1230 Main Street, Suite 700  
Columbia SC 29201  
[mmore@maynardnexsen.com](mailto:mmore@maynardnexsen.com)  
[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)

Deborah B. Barbier, Esquire  
Deborah B. Barbier, LLC  
1811 Pickens Street  
Columbia, SC 29201  
[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)

  
\_\_\_\_\_  
Renee L. Dillon

Columbia, South Carolina  
January 29, 2026

**STATE OF SOUTH CAROLINA**

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF HAMPTON

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten, Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC, Defendants.SUBPOENA IN A CIVIL CASE  
Case Number: 2021-CP-25-00392

Pending in Hampton County

TO: **Gregg Roman, 144 N. Narberth Ave, Apt 442, Narberth, PA 19072**☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

|                    |                 |
|--------------------|-----------------|
| PLACE OF TESTIMONY | COURTROOM       |
|                    | DATE AND TIME , |

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

|                                                                                                                                 |                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| PLACE OF DEPOSITION<br><b>Chartwell Law</b><br><b>130 N. 18<sup>th</sup> Street, Suite 1200</b><br><b>Philadelphia PA 19103</b> | DATE AND TIME<br><b>Thursday, February 26, 2026</b><br><b>10:00 a.m.</b> |
|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects:

|       |               |
|-------|---------------|
| PLACE | DATE AND TIME |
|-------|---------------|

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

|          |                 |
|----------|-----------------|
| PREMISES | DATE AND TIME , |
|----------|-----------------|

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

|                                                                                                                                                                                                                                                                       |                          |                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|------------------------------------------|
| Attorney/Issuing Officer's Signature<br>Indicate if Attorney for Plaintiff or Defendant<br>Attorney's Address and Telephone Number :<br><b>Attorney for Defendants Fratoddi, Rosado, and PISG LLC</b><br><b>4406-B Forest Drive, Columbia, SC 29206, 803-782-4100</b> | January 29, 2026<br>Date | John M. Grantland, Esquire<br>Print Name |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|------------------------------------------|

|                                                                                                      |      |            |
|------------------------------------------------------------------------------------------------------|------|------------|
| Clerk of Court/Issuing Officer's Signature<br>Pro Se Litigant's Name, Address and Telephone Number : | Date | Print Name |
|------------------------------------------------------------------------------------------------------|------|------------|

## PROOF OF SERVICE

|           |                   |                                                                                                              |
|-----------|-------------------|--------------------------------------------------------------------------------------------------------------|
| SERVED    | DATE<br>PLACE     | FEES AND MILEAGE TENDERED TO WITNESS<br><input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$ |
| SERVED ON | MANNER OF SERVICE |                                                                                                              |
| SERVED BY | TITLE             |                                                                                                              |

## DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on \_\_\_\_\_

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

**(c) Protection of Persons Subject to Subpoenas.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

- i. fails to allow reasonable time for compliance; or
- ii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or
- iii. requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or
- iv. subjects a person to undue burden.

**(B) If a subpoena:**

- i. requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- ii. requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- iii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) Duties in Responding to Subpoena.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**From:** Taylor Smith <[Taylor@meriwetherfirm.com](mailto:Taylor@meriwetherfirm.com)>  
**Sent:** Wednesday, February 25, 2026 5:04 PM  
**To:** Tabor Vaux <[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)>  
**Cc:** John M. Grantland <[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)>; Mark Tinsley <[mark@goodingandgooding.com](mailto:mark@goodingandgooding.com)>; John Nichols <[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)>; Lisa Suckow <[lisa.suckow@vmblawfirm.com](mailto:lisa.suckow@vmblawfirm.com)>; Angela Still <[angela@goodingandgooding.com](mailto:angela@goodingandgooding.com)>  
**Subject:** Re: Beach/Renee S., et al. v. Parker/Gregory M., et al. - 2021-CP-25-00392

Tabor,

I'm sorry for tardy reply.

No. Neither Mr. Roman nor Gravitass will be available for a deposition by me. I still lack any authority from them to accept service of process, the law doesn't hold I must (constructively or otherwise), and I have yet to be informed of personal service upon either of them.

Kindly let me know if you have any questions or concerns. Thank you.

Taylor

Sent from my iPhone  
(Please excuse any typos)

On Feb 25, 2026, at 3:47 PM, Tabor Vaux <[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)> wrote:  
Taylor, are you going to respond?

Lisa, since he hasn't yet, please call his law firm and see if you can find out.

Tabor Vaux  
Vaux Marscher Berglind, PA  
Bluffton, SC  
843-757-2888

Sent from my iPhone

Begin forwarded message:

**From:** "John M. Grantland" <[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)>  
**Date:** February 24, 2026 at 1:57:09 PM EST  
**To:** Taylor Smith <[Taylor@meriwetherfirm.com](mailto:Taylor@meriwetherfirm.com)>  
**Cc:** [john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com), Tabor Vaux <[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)>, "Rhett D. Ricard" <[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)>, Lisa Suckow <[lisa.suckow@vmblawfirm.com](mailto:lisa.suckow@vmblawfirm.com)>, "Mark C. Moore" <[MMoore@maynardnexsen.com](mailto:MMoore@maynardnexsen.com)>, Deborah Barbier <[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)>, [mdennis@maynardnexsen.com](mailto:mdennis@maynardnexsen.com), [smcwilliams@maynardnexsen.com](mailto:smcwilliams@maynardnexsen.com), [mark@goodingandgooding.com](mailto:mark@goodingandgooding.com), Cheree Aiken

<CAiken@bannisterwyatt.com>, cbhutto@williamsattys.com,  
vmware@williamsattys.com, jbannister@bannisterwyatt.com, Renee Dillon  
<rdillon@murphygrantland.com>, "J. Grant Stringham"  
<jgrantstringham@chartwelllaw.com>

**Subject: RE: Beach/Renee S., et al. v. Parker/Gregory M., et al. - 2021-CP-25-00392**

Taylor,

Are you producing Mr. Roman for a deposition on February 26? Please let us know.

Thank you and take care.

JG

**From:** John M. Grantland

**Sent:** Friday, February 13, 2026 10:45 AM

**To:** 'Taylor Smith' <Taylor@meriwetherfirm.com>

**Cc:** john@bluesteinattorneys.com; tabor.vaux@vmblawfirm.com; Rhett D. Ricard  
<rricard@maynardnexsen.com>; lisa.suckow@vmblawfirm.com; Mark C. Moore  
<mmoore@maynardnexsen.com>; Deborah Barbier <dbb@deborahbarbier.com>;  
mdennis@maynardnexsen.com; smcwilliams@maynardnexsen.com;  
drew@radekerlaw.com; jbrooks@hamptoncountysc.org; Alex Stalvey  
<AStalvey@bannisterwyatt.com>; mark@goodingandgooding.com; Cheree Aiken  
<CAiken@bannisterwyatt.com>; mark@goodingandgooding.com;  
meredith@bannonlawgroup.com; cbhutto@williamsattys.com;  
vmware@williamsattys.com; rebecca.lindahl@katten.com;  
jbannister@bannisterwyatt.com; jteich@csvg.law; esion@csvg.law; abrantner@csvg.law;  
Renee Dillon <rdillon@murphygrantland.com>; J. Grant Stringham  
<jgrantstringham@chartwelllaw.com>; Crawford Krebs <ckrebs@murphygrantland.com>

**Subject: RE: Beach/Renee S., et al. v. Parker/Gregory M., et al. - 2021-CP-25-00392**

Taylor,

I took the judge off this email. Since you have appeared for Gregg Roman, I've asked Renee' to serve you with the notices of deposition we are serving on Mr. and Mrs. Roman in Philadelphia.

If the date and times are not convenient, please let me know. But we have to get Mr. and Mrs. Roman deposed asap.

We first served Roman at his office of the Middle Eastern Forum on December 5, and his other attorney, Scott Sholder objected to the notice and said it wasn't proper.

Since you've appeared again to the court on behalf of Mr. Roman and Gravitass, there should be no objection to service of his notice of deposition on you as his attorney.

Thank you for your help and take care.  
JG

**From:** Taylor Smith <[Taylor@meriwetherfirm.com](mailto:Taylor@meriwetherfirm.com)>  
**Sent:** Friday, February 13, 2026 10:32 AM  
**To:** [kkellylc@sccourts.org](mailto:kkellylc@sccourts.org); [kkellyj@sccourts.org](mailto:kkellyj@sccourts.org)  
**Cc:** [john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com); John M. Grantland  
 <[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)>; [tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com); Rhett D. Ricard  
 <[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)>; [lisa.suckow@vmblawfirm.com](mailto:lisa.suckow@vmblawfirm.com); Mark C. Moore  
 <[mmoore@maynardnexsen.com](mailto:mmoore@maynardnexsen.com)>; Deborah Barbier <[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)>;  
[mdennis@maynardnexsen.com](mailto:mdennis@maynardnexsen.com); [smcwilliams@maynardnexsen.com](mailto:smcwilliams@maynardnexsen.com); Jody Lyles  
 <[JLyles@murphygrantland.com](mailto:JLyles@murphygrantland.com)>; [drew@radekerlaw.com](mailto:drew@radekerlaw.com); [jbrooks@hamptoncountysc.org](mailto:jbrooks@hamptoncountysc.org);  
 Alex Stalvey <[AStalvey@bannisterwyatt.com](mailto:AStalvey@bannisterwyatt.com)>; [mark@goodingandgooding.com](mailto:mark@goodingandgooding.com); Cheree  
 Aiken <[CAiken@bannisterwyatt.com](mailto:CAiken@bannisterwyatt.com)>; [mark@goodingandgooding.com](mailto:mark@goodingandgooding.com);  
[meredith@bannonlawgroup.com](mailto:meredith@bannonlawgroup.com); [cbhutto@williamsattys.com](mailto:cbhutto@williamsattys.com);  
[vmware@williamsattys.com](mailto:vmware@williamsattys.com); [rebecca.lindahl@katten.com](mailto:rebecca.lindahl@katten.com);  
[jbannister@bannisterwyatt.com](mailto:jbannister@bannisterwyatt.com); [jteich@csvg.law](mailto:jteich@csvg.law); [esion@csvg.law](mailto:esion@csvg.law); [abrantner@csvg.law](mailto:abrantner@csvg.law)  
**Subject:** Re: Beach/Renee S., et al. v. Parker/Gregory M., et al. - 2021-CP-25-00392

Judge Kelly,

Good morning.

I represent Gregg Roman and Gravitas Synergy Solutions, LLC.

Pursuant to Rule 59(g), SCRCP, kindly see the attached Motion to Reconsider (with exhibit) filed in the above-referenced matter this week on behalf of these nonparties.

Of course, if you have any questions or concerns, please feel free to contact me.

Thank you.

TAYLOR M. SMITH IV  
Attorney



923 Calhoun Street, Columbia, SC 29201

(803) 779-2211

[meriwetherfirm.com](http://meriwetherfirm.com)

---

**From:** Cheree Aiken <[CAiken@bannisterwyatt.com](mailto:CAiken@bannisterwyatt.com)>

**Sent:** Wednesday, December 3, 2025 1:08 PM

**To:** [kkellylc@sccourts.org](mailto:kkellylc@sccourts.org) <[kkellylc@sccourts.org](mailto:kkellylc@sccourts.org)>; [kkellyj@sccourts.org](mailto:kkellyj@sccourts.org) <[kkellyj@sccourts.org](mailto:kkellyj@sccourts.org)>

**Cc:** [john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com) <[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)>; [jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com) <[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)>; [tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com) <[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)>; Rhett D. Ricard <[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)>; [lisa.suckow@vmblawfirm.com](mailto:lisa.suckow@vmblawfirm.com) <[lisa.suckow@vmblawfirm.com](mailto:lisa.suckow@vmblawfirm.com)>; Mark C. Moore <[mmoore@maynardnexsen.com](mailto:mmoore@maynardnexsen.com)>; [dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com) <[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)>; [mdennis@maynardnexsen.com](mailto:mdennis@maynardnexsen.com) <[mdennis@maynardnexsen.com](mailto:mdennis@maynardnexsen.com)>; [smcwilliams@maynardnexsen.com](mailto:smcwilliams@maynardnexsen.com) <[smcwilliams@maynardnexsen.com](mailto:smcwilliams@maynardnexsen.com)>; [jlyles@murphygrantland.com](mailto:jlyles@murphygrantland.com) <[jlyles@murphygrantland.com](mailto:jlyles@murphygrantland.com)>; [drew@radekerlaw.com](mailto:drew@radekerlaw.com) <[drew@radekerlaw.com](mailto:drew@radekerlaw.com)>; Taylor Smith <[Taylor@meriwetherfirm.com](mailto:Taylor@meriwetherfirm.com)>; [jbrooks@hamptoncountysc.org](mailto:jbrooks@hamptoncountysc.org) <[jbrooks@hamptoncountysc.org](mailto:jbrooks@hamptoncountysc.org)>; Alex Stalvey <[AStalvey@bannisterwyatt.com](mailto:AStalvey@bannisterwyatt.com)>; [mark@goodingandgooding.com](mailto:mark@goodingandgooding.com) <[mark@goodingandgooding.com](mailto:mark@goodingandgooding.com)>

**Subject:** Beach/Renee S., et al. v. Parker/Gregory M., et al. - 2021-CP-25-00392

Dear Judge Kelly: please see attached The Parker's Defendants' Response In Opposition to the July 18, 2025 E-mail of Plaintiffs' Counsel along with Exhibits A-I that have been filed in this matter on today's date regarding the above referenced matter. I am copying all counsel of record on this email. Thank you!

Sincerely,

Cheree Aiken  
Paralegal to James W. Bannister  
Bannister, Wyatt & Stalvey, LLC  
24 Cleveland Street, Ste. 100 (29601)  
P.O. Box 10007  
Greenville, SC 29603  
Phone: 864-298-0084  
Fax: 864-298-0146

**CAUTION:** Always verbally confirm wiring instructions by phone before sending funds.



John M. Grantland  
Phone: (803) 454-1237  
jgrantland@murphygrantland.com

February 16, 2026

**VIA EMAIL & CERTIFIED MAIL—**  
**RETURN RECEIPT REQUESTED**

Taylor M. Smith, IV, Esquire  
Meriwether Law, LLC  
923 Calhoun Street  
Columbia SC 29201  
[taylor@meriwetherfirm.com](mailto:taylor@meriwetherfirm.com)

Re: Beach, Renee, et al v. Parker, Gregory et al  
Civil Action No.: 2021-CP-25-00392  
Claim No.: CP2107161  
Our File No.: 1352-0005

Dear Taylor:

I am in receipt of your Motion to Reconsider on behalf of Gregg Roman and Gravitas Synergy Solutions. As you may know, we have served Mr. Roman in Philadelphia with a subpoena for his deposition and were informed by his Philadelphia counsel that service was not proper. We are attempting to serve him again in Philadelphia currently.

Since you have appeared in this case to file a Motion to Reconsider on behalf of Gregg Roman and Gravitas Synergy Solutions, I am serving you with a Notice of Deposition of Gregg and Stacey Roman for February 26, 2026. If this date is not convenient for you or for Gregg and Stacey Roman, please let me know, and I will be happy to reschedule it for a mutually convenient date.

Thank you for your consideration. I look forward to talking to you soon.

Yours truly,

John M. Grantland

JMG/rld  
Enclosure

cc: Mark B. Tinsley, Esquire (*via email only*)  
John S. Nichols, Esquire (*via email only*)  
Tabor Vaux, Jr., Esquire (*via email only*)

Mark C. Moore, Esquire *(via email only)*  
Rhett D. Ricard, Esquire *(via email only)*  
Deborah B. Barbier, Esquire *(via email only)*  
C. Bradley Hutto, Esquire *(via email only)*

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC,

Defendants.

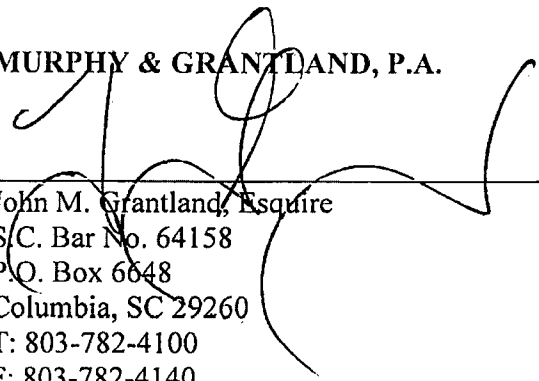
**AMENDED NOTICE OF DEPOSITION  
OF GREGG ROMAN**

**TO: MARK B. TINSLEY, ESQUIRE, R. TABOR VAUX, JR., ESQUIRE, AND JOHN S. NICHOLS, ESQUIRE, ATTORNEYS FOR PLAINTIFFS, AND TO THE PLAINTIFFS ABOVE NAMED:**

YOU WILL PLEASE TAKE NOTICE that Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, will take the deposition of **Gregg Roman** at the offices of Chartwell Law, 130 N. 18th Street, Suite 1200, Philadelphia, Pennsylvania, 19103, on Thursday, February 26, 2026, at 10:00 a.m., upon oral examination before a Notary Public for South Carolina or some other officer authorized by law to administer oaths. The oral examination shall continue from time to time and day to day until completed, including any adjournments thereof. **You are hereby notified, and you are further invited to attend and participate.**

*(signature on following page)*

**MURPHY & GRANTLAND, P.A.**



---

John M. Grantland, Esquire  
S.C. Bar No. 64158  
P.O. Box 6648  
Columbia, SC 29260  
T: 803-782-4100  
F: 803-782-4140  
[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)

*Attorneys for Defendants Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC*

Columbia, South Carolina  
January 29, 2026

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco,  
Jason D'Cruz, Vicky Ward, Max Fratoddi,  
Henry Rosado, and Private Investigation  
Services Group, LLC,

Defendants.

**CERTIFICATE OF SERVICE**

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., attorneys for Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, do hereby certify that I have served a copy of the foregoing, **Amended Notice of Deposition of Gregg Roman**, in connection with the above-referenced case by e-mailing and mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

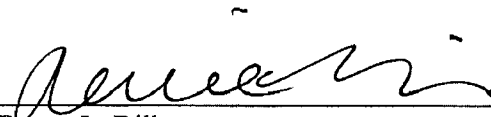
Mark B. Tinsley, Esquire  
Gooding & Gooding, P.A.  
Post Office Box 1000  
Allendale, SC 29810  
[mark@goodingandgooding.com](mailto:mark@goodingandgooding.com)

John S. Nichols, Esquire  
Bluestein Thompson Sullivan, LLC  
Post Office Box 7965  
Columbia, SC 29202  
[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)

Roberts "Tabor" Vaux, Jr., Esquire  
Vaux, Marscher, Berglind, PA  
Post Office Box 769  
Bluffton, SC 29910  
[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)

Mark C. Moore, Esquire  
Rhett D. Ricard, Esquire  
Maynard Nexsen, P.C.  
1230 Main Street, Suite 700  
Columbia SC 29201  
[mmore@maynardnexsen.com](mailto:mmore@maynardnexsen.com)  
[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)

Deborah B. Barbier, Esquire  
Deborah B. Barbier, LLC  
1811 Pickens Street  
Columbia, SC 29201  
[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)

  
\_\_\_\_\_  
Renee L. Dillon

Columbia, South Carolina  
January 29, 2026

# STATE OF SOUTH CAROLINA

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF HAMPTON

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten, Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC, Defendants.

SUBPOENA IN A CIVIL CASE  
Case Number: 2021-CP-25-00392

Pending in Hampton County

TO: **Gregg Roman, 144 N. Narberth Ave, Apt 442, Narberth, PA 19072**

☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME ,

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

**Chartwell Law**

**130 N. 18<sup>th</sup> Street, Suite 1200**

**Philadelphia PA 19103**

DATE AND TIME

**Thursday, February 26, 2026**

**10:00 a.m.**

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects:

PLACE

DATE AND TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME ,

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Attorney/Issuing Officer's Signature

Indicate if Attorney for Plaintiff or Defendant

Attorney's Address and Telephone Number :

*Attorney for Defendants Fratoddi, Rosado, and PISG LLC*

4406-B Forest Drive, Columbia, SC 29206, 803-782-4100

January 29, 2026

Date

John M. Grantland, Esquire

Print Name

Clerk of Court/Issuing Officer's Signature

Date

Print Name

Pro Se Litigant's Name, Address and Telephone Number :

## PROOF OF SERVICE

|           |                           |                                                                                                                    |
|-----------|---------------------------|--------------------------------------------------------------------------------------------------------------------|
| SERVED    | DATE _____<br>PLACE _____ | FEES AND MILEAGE TENDERED TO WITNESS<br><input type="checkbox"/> YES <input type="checkbox"/> NO   AMOUNT \$ _____ |
| SERVED ON | MANNER OF SERVICE         |                                                                                                                    |
| SERVED BY | TITLE                     |                                                                                                                    |

## DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on \_\_\_\_\_  
 SIGNATURE OF SERVER \_\_\_\_\_  
 ADDRESS OF SERVER \_\_\_\_\_

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

**(c) Protection of Persons Subject to Subpoenas.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

- i. fails to allow reasonable time for compliance; or
  - ii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or
  - iii. requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or
  - iv. subjects a person to undue burden.
- (B) If a subpoena:
- i. requires disclosure of a trade secret or other confidential research, development, or commercial information, or
  - ii. requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
  - iii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) Duties in Responding to Subpoena.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC,

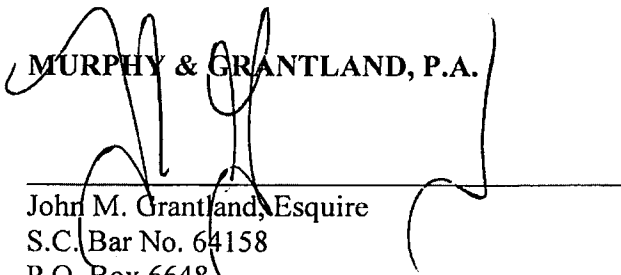
Defendants.

**NOTICE OF DEPOSITION  
OF STACEY ROMAN**

**TO: MARK B. TINSLEY, ESQUIRE, R. TABOR VAUX, JR., ESQUIRE, AND JOHN S. NICHOLS, ESQUIRE, ATTORNEYS FOR PLAINTIFFS, AND TO THE PLAINTIFFS ABOVE NAMED:**

YOU WILL PLEASE TAKE NOTICE that Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, will take the deposition of **Stacey Roman** at the offices of Chartwell Law, 130 N. 18th Street, Suite 1200, Philadelphia, Pennsylvania, 19103, on Thursday, February 26, 2026, at 1:00 p.m., upon oral examination before a Notary Public for South Carolina or some other officer authorized by law to administer oaths. The oral examination shall continue from time to time and day to day until completed, including any adjournments thereof. **You are hereby notified, and you are further invited to attend and participate.**

*(signature on following page)*



MURPHY & GRANTLAND, P.A.

---

John M. Grantland, Esquire  
S.C. Bar No. 64158  
P.O. Box 6648  
Columbia, SC 29260  
T: 803-782-4100  
F: 803-782-4140  
[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)

*Attorneys for Defendants Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC*

Columbia, South Carolina  
January 29, 2026

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco,  
Jason D'Cruz, Vicky Ward, Max Fratoddi,  
Henry Rosado, and Private Investigation  
Services Group, LLC,

Defendants.

**CERTIFICATE OF SERVICE**

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., attorneys for Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, do hereby certify that I have served a copy of the foregoing, **Notice of Deposition of Stacey Roman**, in connection with the above-referenced case by e-mailing and mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

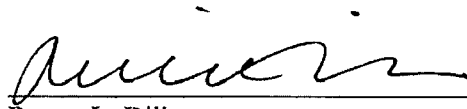
Mark B. Tinsley, Esquire  
Gooding & Gooding, P.A.  
Post Office Box 1000  
Allendale, SC 29810  
[mark@goodingandgooding.com](mailto:mark@goodingandgooding.com)

John S. Nichols, Esquire  
Bluestein Thompson Sullivan, LLC  
Post Office Box 7965  
Columbia, SC 29202  
[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)

Roberts "Tabor" Vaux, Jr., Esquire  
Vaux, Marscher, Berglind, PA  
Post Office Box 769  
Bluffton, SC 29910  
[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)

Mark C. Moore, Esquire  
Rhett D. Ricard, Esquire  
Maynard Nexsen, P.C.  
1230 Main Street, Suite 700  
Columbia SC 29201  
[mmore@maynardnexsen.com](mailto:mmore@maynardnexsen.com)  
[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)

Deborah B. Barbier, Esquire  
Deborah B. Barbier, LLC  
1811 Pickens Street  
Columbia, SC 29201  
[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)



---

Renee L. Dillon

Columbia, South Carolina  
January 29, 2026

**STATE OF SOUTH CAROLINA**

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF HAMPTON

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten, Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC, Defendants.

SUBPOENA IN A CIVIL CASE

Case Number: 2021-CP-25-00392

Pending in Hampton County

TO: **Stacey Roman, 144 N. Narberth Ave, Apt 442, Narberth, PA 19072**

☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

**Chartwell Law**

**130 N. 18<sup>th</sup> Street, Suite 1200**

**Philadelphia PA 19103**

DATE AND TIME

**Thursday, February 26, 2026**

**1:00 p.m.**

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects:

PLACE

DATE AND TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Attorney/Issuing Officer's Signature  
Indicate if Attorney for Plaintiff or Defendant  
Attorney's Address and Telephone Number :

*Attorney for Defendants Fratoddi, Rosado, and PISG LLC*

4406-B Forest Drive, Columbia SC 29206, 803-782-4100

January 29, 2026

Date

John M. Grantland, Esquire

Print Name

Clerk of Court/Issuing Officer's Signature

Pro Se Litigant's Name, Address and Telephone Number :

Date

Print Name

## PROOF OF SERVICE

|           |                   |                                                                                                            |
|-----------|-------------------|------------------------------------------------------------------------------------------------------------|
| SERVED    | DATE<br>PLACE     | FEES AND MILEAGE TENDERED TO WITNESS<br><input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$ |
| SERVED ON | MANNER OF SERVICE |                                                                                                            |
| SERVED BY | TITLE             |                                                                                                            |

## DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on \_\_\_\_\_  
SIGNATURE OF SERVER

\_\_\_\_\_  
 ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

**(c) Protection of Persons Subject to Subpoenas.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

- i. fails to allow reasonable time for compliance; or
- ii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or
- iii. requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or
- iv. subjects a person to undue burden.

**(B) If a subpoena:**

- i. requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- ii. requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- iii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) Duties in Responding to Subpoena.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

November 25, 2025

**VIA EMAIL & U.S. MAIL**

Taylor Smith, IV, Esquire  
Meriwether Law LLC  
923 Calhoun Street  
Columbia, SC 29201  
[taylor@meriwetherfirm.com](mailto:taylor@meriwetherfirm.com)

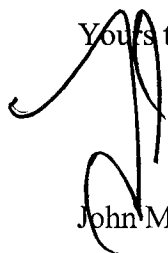
Re: Beach, Renee, et al v. Parker, Gregory et al  
Civil Action No.: 2021-CP-25-00392  
Claim No.: CP2107161  
Our File No.: 1352-0005

Dear Taylor:

Enclosed please find our Notice of Deposition of Gregg Roman. We have noticed Mr. Roman's deposition for Thursday, December 11, 2025, at 10:00 a.m., at 130 N. 18<sup>th</sup> Street, Suite 1200, in Philadelphia. I am attempting to serve Mr. Roman with a domesticated subpoena by process server. Since you are still attorney of record and have not been relieved as counsel for Mr. Roman, I wanted to make sure you had a copy of this deposition notice and subpoena, which I am serving on you as Mr. Roman's counsel.

Please let me know if you have any questions.

Yours truly,



John M. Grantland

JMG/rld  
Enclosures

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC,

Defendants.

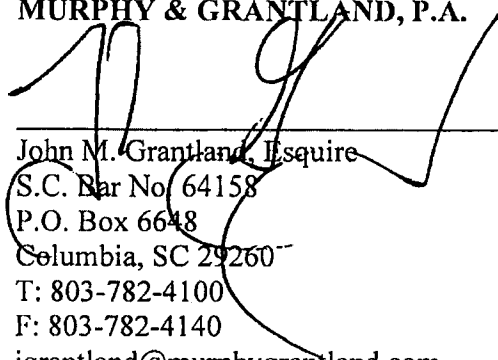
**NOTICE OF DEPOSITION  
OF GREGG ROMAN**

**TO: MARK B. TINSLEY, ESQUIRE, R. TABOR VAUX, JR., ESQUIRE, AND JOHN S. NICHOLS, ESQUIRE, ATTORNEYS FOR PLAINTIFFS, AND TO THE PLAINTIFFS ABOVE NAMED:**

YOU WILL PLEASE TAKE NOTICE that Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, will take the deposition of **Gregg Roman** at the offices of Chartwell Law, 130 N. 18th Street, Suite 1200, Philadelphia, Pennsylvania, 19103, on Thursday, December 11, 2025, at 10:00 a.m., upon oral examination before a Notary Public for South Carolina or some other officer authorized by law to administer oaths. The oral examination shall continue from time to time and day to day until completed, including any adjournments thereof. **You are hereby notified, and you are further invited to attend and participate.**

*(signature on following page)*

**MURPHY & GRANTLAND, P.A.**



---

John M. Grantland, Esquire  
S.C. Bar No. 64158  
P.O. Box 6648  
Columbia, SC 29260  
T: 803-782-4100  
F: 803-782-4140  
[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)

*Attorneys for Defendants Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC*

Columbia, South Carolina  
November 11, 2025

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF HAMPTON

CIVIL ACTION NO: 2021-CP-25-00392

Renee S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten,

Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco,  
Jason D'Cruz, Vicky Ward, Max Fratoddi,  
Henry Rosado, and Private Investigation  
Services Group, LLC,

Defendants.

**CERTIFICATE OF SERVICE**

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., attorneys for Defendants Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC, do hereby certify that I have served a copy of the foregoing, **Notice of Deposition of Gregg Roman**, in connection with the above-referenced case by e-mailing and mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

Mark B. Tinsley, Esquire  
Gooding & Gooding, P.A.  
Post Office Box 1000  
Allendale, SC 29810  
[mark@goodingandgooding.com](mailto:mark@goodingandgooding.com)

John S. Nichols, Esquire  
Bluestein Thompson Sullivan, LLC  
Post Office Box 7965  
Columbia, SC 29202  
[john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com)

Roberts "Tabor" Vaux, Jr., Esquire  
Vaux, Marscher, Berglind, PA  
Post Office Box 769  
Bluffton, SC 29910  
[tabor.vaux@vmblawfirm.com](mailto:tabor.vaux@vmblawfirm.com)

Mark C. Moore, Esquire  
Rhett D. Ricard, Esquire  
Maynard Nexsen, P.C.  
1230 Main Street, Suite 700  
Columbia SC 29201  
[mmore@maynardnexsen.com](mailto:mmore@maynardnexsen.com)  
[rricard@maynardnexsen.com](mailto:rricard@maynardnexsen.com)

Deborah B. Barbier, Esquire  
Deborah B. Barbier, LLC  
1811 Pickens Street  
Columbia, SC 29201  
[dbb@deborahbarbier.com](mailto:dbb@deborahbarbier.com)



---

Renee L. Dillon

Columbia, South Carolina  
November 11, 2025



John M. Grantland  
Phone: (803) 454-1237  
jgrantland@murphygrantland.com

November 11, 2025

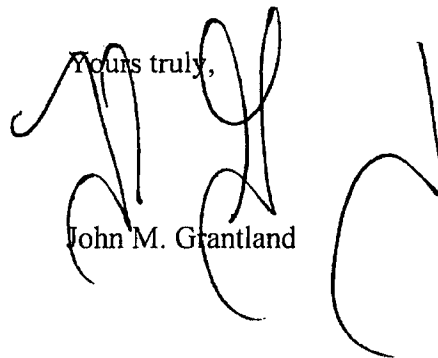
**VIA PROCESS SERVER**

Gregg Roman  
144 N Narberth Ave, Appt 442  
Narberth, PA 19072

Re: Beach, Renee, et al v. Parker, Gregory et al  
Civil Action No.: 2021-CP-25-00392  
Claim No.: CP2107161  
Our File No.: 1352-0005

Dear Mr Roman:

Enclosed please find a subpoena for the taking of your deposition with regard to the above-referenced case, which I am serving upon you by mail. Please note that your deposition will take place on Thursday, December 11, 2025, beginning at 10:00 a.m., at the law offices of Chartwell Law, 130 N. 18<sup>th</sup> Street, Suite 1200, Philadelphia, Pennsylvania, 19103. Also enclosed is a courtesy copy of your deposition notice.

Yours truly,  
  
John M. Grantland

JMG/rld  
Enclosure

cc: Mark B. Tinsley, Esquire  
John S. Nichols, Esquire  
Roberts Tabor Vaux, Jr., Esquire  
Mark C. Moore, Esquire  
Rhett D. Ricard, Esquire  
Deborah B. Barbier, Esquire

# STATE OF SOUTH CAROLINA

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF HAMPTON

Rence S. Beach, Phillip Beach, Robin Beach,  
Savannah Tuten, and Seth Tuten, Plaintiffs,

v.

Gregory M. Parker, Gregory M. Parker, Inc.  
d/b/a Parker's Corporation, Blake Greco, Jason  
D'Cruz, Vicky Ward, Max Fratoddi, Henry  
Rosado, and Private Investigation Services  
Group, LLC, Defendants.

SUBPOENA IN A CIVIL CASE

Case Number: 2021-CP-25-00392

Pending in Hampton County

TO: Gregg Roman, 144 N Narberth Ave, Appt 442, Narberth, PA 19072

☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

Chartwell Law

130 N. 18<sup>th</sup> Street, Suite 1200

Philadelphia PA 19103

DATE AND TIME

Thursday, December 11, 2025

10:00 a.m.

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects:

PLACE

DATE AND TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Attorney/Issuing Officer's Signature

Indicate if Attorney for Plaintiff or Defendant

Attorney's Address and Telephone Number :

Attorney for Defendants Fratoddi, Rosado, and PISG LLC

4406B Forest Drive, Columbia, SC 29206, 803-782-4100

Nov. 11, 2025

Date

John M. Grantland, Esquire

Print Name

Clerk of Court/Issuing Officer's Signature

Date

Print Name

Pro Se Litigant's Name, Address and Telephone Number :

## PROOF OF SERVICE

|           |                   |                                                                                                                         |
|-----------|-------------------|-------------------------------------------------------------------------------------------------------------------------|
| SERVED    | DATE<br>PLACE     | FEES AND MILEAGE TENDERED TO WITNESS<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   AMOUNT \$ |
| SERVED ON | MANNER OF SERVICE |                                                                                                                         |
| SERVED BY | TITLE             |                                                                                                                         |

## DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on \_\_\_\_\_

SIGNATURE OF SERVER

Murphy & Grantland, PA, PO Box 6648, Columbia SC 29260  
ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

**(c) Protection of Persons Subject to Subpoenas.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

- i. fails to allow reasonable time for compliance; or
- ii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or
- iii. requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or
- iv. subjects a person to undue burden.

**(B) If a subpoena:**

- i. requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- ii. requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- iii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) Duties in Responding to Subpoena.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**STATE OF SOUTH CAROLINA  
COUNTY OF HAMPTON**

**Renee S. Beach, Phillip Beach, Robin Beach, Savannah Tuten, and Seth Tuten,**

**Plaintiffs,**

**-vs-**

**Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Blake Greco, Jason D'Cruz, Vicky Ward, Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC,**

**Defendants.**

**IN THE COURT OF COMMON PLEAS**

**CASE NO. 2021-CP-25-00392**

**ROMAN RESPONSE TO  
DEFENDANTS' FRATODDI,  
ROSADO, AND PRIVATE  
INVESTIGATION SERVICES  
GROUP, LLC MOTION FOR RULE  
TO SHOW CAUSE AND NOTICE  
FOR AND MOTION FOR  
SANCTIONS**

NON-PARTY GREGG ROMAN by and through undersigned counsel, hereby responds to Defendant's Max Fratoddi, Henry Rosado, and Private Investigation Services Group, LLC (hereinafter the "Defendants") Motion for the issuance of a Rule to Show Cause as to why the Non-Party Roman should not be held in contempt for failing to comply with a subpoena for deposition.

Non-Party Roman has not failed to comply with a subpoena for deposition. As can be seen by the Defendant's own exhibits, not only has there not been an affidavit of service filed stating that Non-Party Roman has been served, there is also no proof that the subpoena has been domesticated in the Commonwealth of Pennsylvania and even if such proof were present and the Court ordered his appearance to argue why sanctions should not be ordered, his testimony would be privileged and his deposition could not be taken in accordance with laws and constitutions of South Carolina, Pennsylvania or the United States of America.

Defendants' Motion and Rule to Show Cause on its own terms fails to establish a legal duty for Mr. Roman to appear for a deposition. Defendants' Exhibit A states in the letter it was

served to Non-Party Roman via Process Server at 144 N. Narberth Ave., Apt. 442, Narberth, PA 19072, dated November 11, 2025. (According to Defendants' Exhibit C this is not Mr. Roman's dwelling house or usual place of abode, as required for service of process.) No affidavit of service by this process server has been filed. (Further, as you can see by the Non-Party Roman's Exhibit A, the addressed used by the Defendants is a United States Post Office not a residence or place of business of Roman.) Therefore, under SCRCF Rule 4(d)(1), Defendants' motion fails to establish that proper service of process occurred, thus creating no duty of deposition appearance under Rule 30, SCRCF or the laws of this state.

Next, Defendants' Motion for Rule To Show Cause Exhibit B provides that on January 6, 2026, Ms. McLaughlin, Esquire, sent a letter to Mr. Stringham stating that she was writing on behalf of Mr. Roman. This letter stated the facts as to why the subpoena as provided in the Commonwealth of Pennsylvania were not properly served. *First*, at the time the "subpoenas" were attempting to be served on Mr. Roman, Mr. Roman no longer resided in Pennsylvania, or for that matter, the United States, as of June 2025, and therefore the Commonwealth of Pennsylvania did not have jurisdiction over Mr. Roman and service was not proper. *Second*, the subpoena that was served on December 9, 2025, at Mr. Roman's supposed place of business, is not his regular place of business, he has no staff at that location, and no one in management of the building had permission to accept service for him. *Third*, the "attempted service" on December 29, 2026, at his "home" is defective for 2 reasons. The first, as we have already established, the address Defendant was using is a U.S. Post Office. Second, as of this date, Roman and his family have resided outside of the United States. *Fourth*, if service of the subpoena been proper in the Commonwealth of Pennsylvania, Mr. Roman has protection in the Commonwealth of Pennsylvania as a journalist under the Pennsylvania Shield Law, 42 Pa. Const. Stat. § 5942. under the First Amendment's

reporter's privilege. In the Commonwealth, this protection is absolute. There are no exceptions for criminal investigations, civil litigation, and for non-party discovery in out of state litigation. *Fifth*, as a noted investigative journalist and a national security analyst that covers Middle Eastern matters, Mr. Roman's safety (and that of his sources) is of the utmost concern. Mr. Roman's most recent affidavit is attached as Non-Party Roman's Exhibit B and speaks as to the reasons for the non-disclosure of his location. Defendants' motion on its own terms fails to establish that a legal duty was created for appearance a deposition or that sanctions are appropriate for such a failure to appear.

Finally, Defendant's motion for rule show cause appears to intimate that personal service is no longer required in this action, yet fails to state any authority for this position. Mr. Roman has indeed retained Meriwether Law to represent him in quashing a subpoena for bank records issued by the Plaintiffs in this case, as accurately described in Defendants Exhibit D and E. And yes, Mr. Roman has not given the undersigned the authority to accept service on behalf of himself or Gravitas Synergy Solutions. Absent a client's authority to accept service of process or law which provides that an attorney's appearance for that client means the attorney must always accept future service of process, there is simply no lawful basis for holding that notification to an attorney such as the undersigned, constitutes service of process in this matter.

Rule 45(e), SCRCP, provides the requested remedy for Mr. Roman's purported contempt of court. *Id.* ("Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a non-party to attend a deposition, permit an inspection, or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A); or if served without an adequate time to respond; or if service is made

upon an individual under Rule 4(d)(1) and the individual did not receive or acknowledge the subpoena.) As made abundantly clear by the record of this matter there was no proper service of any of Defendants' subpoenas in this matter upon Mr. Roman. Despite this, Mr. Roman must now appear at a hearing seeking contempt sanctions for what Defendants understand did not actually occur. Most troubling is that it appears from Defendants Motion and its Exhibits that at least counsel for Defendants was aware by January 2026 that Roman and his family no longer resided in the United States (*See* Defendants Exhibit B), yet Defendants' Counsel signed issued a new subpoena to Mr. Roman at the same address of previously defective subpoena (*See* Defendants Exhibit D, 6-7), one Counsel must have known at that time was not a place linked to Mr. Roman in any meaningful manner. Regardless, Defendants now proceed with this motion and the use of the Court's time and power. Rule 30(b)(2), SCRCR provides that "plaintiff's attorney shall sign the notice, and his signature constitutes a certification by him that to the best of his knowledge, information, and belief the statement and supporting facts are true. The sanctions provided by Rule 11 are applicable to the certification." It is Defendants' counsel's signature upon the Feb. 26 subpoena and the signing of this instant motion that warrant sanction against Defendants' counsel's conduct.

Discovery sanctions are imposed "to penalize those whose conduct may be deemed to warrant such a sanction, and to deter those who might be tempted to such conduct in the absence of such a deterrent." *Karppi v. Greenville Terrazzo Co.*, 327 S.C. 538, 545, 489 S.E.2d 679, 683 (Ct.App.1997) (*quoting National Hockey League v. Metropolitan Hockey Club, Inc.*, 427 U.S. 639, 96 S.Ct. 2778, 49 L.Ed.2d 747 (1976)). "If defendants' counsel has taken action warranting sanctions, dismissing the issue without ruling on its merits allows them to go unpenalized. Such action also decreases the likelihood of others being deterred from similar misconduct." *Creighton*

*v. Coligny Plaza Ltd. P'ship*, 334 S.C. 96, 123-124, 512 S.E.2d 510, 524-525 (Ct. App. 1998)(page number omitted). Additionally, SCRCP Rule 30(g)(2) provides for relief for Mr. Roman in this matter: “[i]f the party giving the notice of the taking of a deposition of a witness fails to serve a subpoena upon him and the witness because of such failure does not attend, and if another party attends in person or by attorney because he expects the deposition of that witness to be taken, the court may order the party giving the notice to pay such other party the reasonable expenses incurred by him and his attorney in attending, including reasonable attorney's fees.” Again, no notice of this deposition as provided by proper personal service of this subpoena was accomplished; however, if had been, then the policy of this rule should state that sanctions for Roman would be appropriate in this matter.

WHEREFORE, Non-Party Gregg Roman respectfully requests that this Court enter an Order:

- (a) Denying the Relief Defendants seek in their Motion and Rule to Show Cause;
- (b) Granting sanctions in the form of an award of reasonable attorney’s fees and costs associated with defending against this purported, not actual, service of a process and this motion; and
- (c) Granting such other relief as the Court deems just and proper.

Upon information and belief, further consultation with opposing counsel concerning the subject of this motion would serve no useful purpose.

[signature next page]

Respectfully submitted,

s/ Taylor Smith  
Taylor M. Smith IV  
S.C. Bar No. 101584  
MERIWETHER LAW  
923 Calhoun Street  
Columbia, South Carolina 29201  
(803) 779-2211  
taylor@meriwetherfirm.com  
ATTORNEY FOR GREGG ROMAN

Columbia, South Carolina  
May 13, 2026