

RECEIVED

Jul 21 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Family Court

Civil Action Court Case Nos.: 2025-DR-26-2774 & 2026-DR-26-1083

Appellate Case No. 2026-001137

Stuart M. Axelrod,

Petitioner,

v.

Carla Ericson,

Respondent.

Reply Affidavit of Stuart Axelrod

Personally appeared before me, Stuart M. Axelrod, who being duly sworn, deposes and says that:

1. I am over the age of eighteen (18) years and am competent to make this affidavit. I have personal knowledge of the matters so stated, and to those matters stated on information and belief, I have a good faith basis for believing them to be true.
2. This affidavit is filed to respond¹ to the false statements contained in the Affidavit of Carla Ericson dated July 6, 2026 filed with this Court with her counsel's *undated* "Response" which appeared to have been docketed by this Court on July 6, 2026.

¹ I am not responding to Ericson's extraneous allegations as to what she believes my motives are and other irrelevant information about her dog, repairs to a home in which she is living with my consent, and for which I pay the mortgage, utilities and until recently, her full-time maid. This addresses only her false statements about the illegal activity which is documented. I acknowledge I swapped her Lexus automobile out with a Mercedes Benz which I provide at no cost to her. The Mercedes was fully insured, registered, freshly serviced and fully detailed. I

3. Carla and I became adverse when I asked her for a divorce on August 1, 2025 or August 2, 2025, although we lived in the same house until November 28, 2025² but living essentially separately. It was clear after August 1, 2025 or August 2, 2025 that any implied right Carla might have had to access any of my personal belongings including emails expressly ended when we became adverse. Once that occurred, I had a reasonable expectation of privacy as to all matters, and Carla had no right to access my electronic devices or anything else of mine once we were adverse.
4. Carla never used my personal email address or my desktop computer at home. The only device on which my personal email was accessible in our home was on my personal desktop computer in my office; Carla did not use my office for any purpose either before we became adverse or after. I was unaware she even knew how to use my desktop until I later learned she had illegally intercepted my personal emails, including an October 10, 2025 confidential email from my personal lawyers, which she forwarded to two of her personal friends on October 14, 2025. I learned all of this in November, 2025. She has identified dozens of illegally intercepted personal emails and produced copies in her discovery responses in family court litigation. I am informed and believe that Carla admitted intercepting my personal emails and providing them to her lawyer in a hearing at the S.C. Department of Employment and Workplace on June 30, 2026³.

also voluntarily pay her health insurance since she was terminated from employment (termination for cause was upheld by the SCDEW hearing officer). By way of context, however, Carla has independent income from her active marijuana license on farmland in California, where Carla resides. She has not resided in South Carolina for more than five (5) years. I also continue to pay living expenses for Carla's mother in California.

² Carla brought her friend Ruth Le May to the house and I was preparing dinner. Le May assaulted me in the presence of my friend Joe. I fled the house with Joe and moved elsewhere.

³ The transcript is being prepared and not yet available to my knowledge.

5. Before we became adverse, Carla would occasionally show me a picture of something on her iPad that she wanted to recreate or use in her art studio, and she would email it from her iPad to my personal email address. However, Carla did not know how to print or convert the images to be printed. She never used my desktop computer or used my personal email address even before we became adverse, other than to send the images she wanted me to print. Carla did not use my desktop and did not know how to print anything from my personal email or from my computer. Carla did not have a printer. Once we became adverse, she was not allowed into my personal office, although I did not lock the door to the office.
6. Carla admits in Paragraph 2 of her affidavit that the basis for requesting a divorce when she filed in December 2025 was adultery. She could have had no knowledge of any alleged adultery without accessing my personal email account or digging through papers in my private office after we became adverse. The person with whom she alleges adultery was not a part of my life prior to asking Carla for a divorce.
7. On information and belief, the forensic consultant whose affidavit is already of record in this case has subsequently identified by date recordings made by Carla on that particular device beginning on July 25, 2025, through August 2025. The recording on July 28, 2025, records a female voice saying, "This is Carla." The device could not have been purchased in September 2025 because the forensic consultant has recovered dated recordings on the single device which was recovered from my bedroom were made as early as July 25, 2025.
8. I am informed and believe there are two specific instances where someone accessed the audio device, one on August 12, 2025, and a second occasion on August 19, 2025,

when an attempt was made to “reformat” the audio recorder. I am informed and believe this may relate to deleted .wav files that Mr. Watkins reported in his original report.

9. I am informed that at least one recording, on July 28, 2025, contains a female voice speaking with a criminal defense client who was represented by my law firm. The female voice is advising the client when to appear for “roll call” which is a typical event in handling of a criminal defense case. I certainly never authorized Carla to make audio recordings of communications with clients of the law firm.
10. I am informed by Mr. Watkins that the same device that was found in my bedroom also made recordings starting on October 1, 2025, and continued on October 2, 3, 9, 10 and 11, 2025. This is a single device that also contains recordings from July 2025 until the device was discovered and sent for forensic examination. The device could not have been purchased in September 2025.
11. I certainly never consented to Carla recording me at any time, and certainly none of my clients, either before or after we became adverse.
12. On October 14, 2025, months after we became adverse, Carla gained access to my personal desktop computer without my permission at the former marital home which we both occupied at that time. Carla sent an email from my personal email account (so it appears to have been sent by me) to one of her friends, as well as to her work email, then sent it to another friend from her own email account. The email she forwarded to her friends was an email I had received from my domestic attorneys on October 10, 2025, discussing strategy for possible domestic litigation (which had not yet been filed, Carla filed on December 8, 2025). A redacted copy of this transmission is attached as **Exhibit A** to this affidavit.

13. A copy of Carla's discovery responses from family court received April 27, 2026, list all emails Carla intercepted from my personal email. A redacted copy of the discovery response is attached as **Exhibit B** to this affidavit. In Paragraph 7 on Page 2, Carla lists the emails she intercepted from my personal email (continuing to Page 5). The production also included copies of each of the intercepted emails (unnumbered PDF Page 13-16). The verification attached to the discovery responses (unnumbered PDF page 18) includes Carla's sworn testimony that Carla "has personally [the content of the discovery responses] furnished [the content] to said attorney."
14. I have been attempting to settle the domestic case with Carla since before I was forced to flee the marital home on November 28, 2026. Carla filed for divorce. I have attempted to settle repeatedly. She and her attorneys refuse to discuss settlement.

FURTHER DEPONENT SAYETH NOT.


Stuart M. Axelrod

Sworn to before me
this 13th day of July, 2026



Notary Public for South Carolina

Printed name of notary: Lori Burrue

My Commission expires: 2/22/32

Lori Burrow

From: Carla Ericson
Sent: Tuesday, October 14, 2025 10:32 AM
To: Katarina Bonnevier
Subject: FW: Axelrod - Attorney Client Privileged

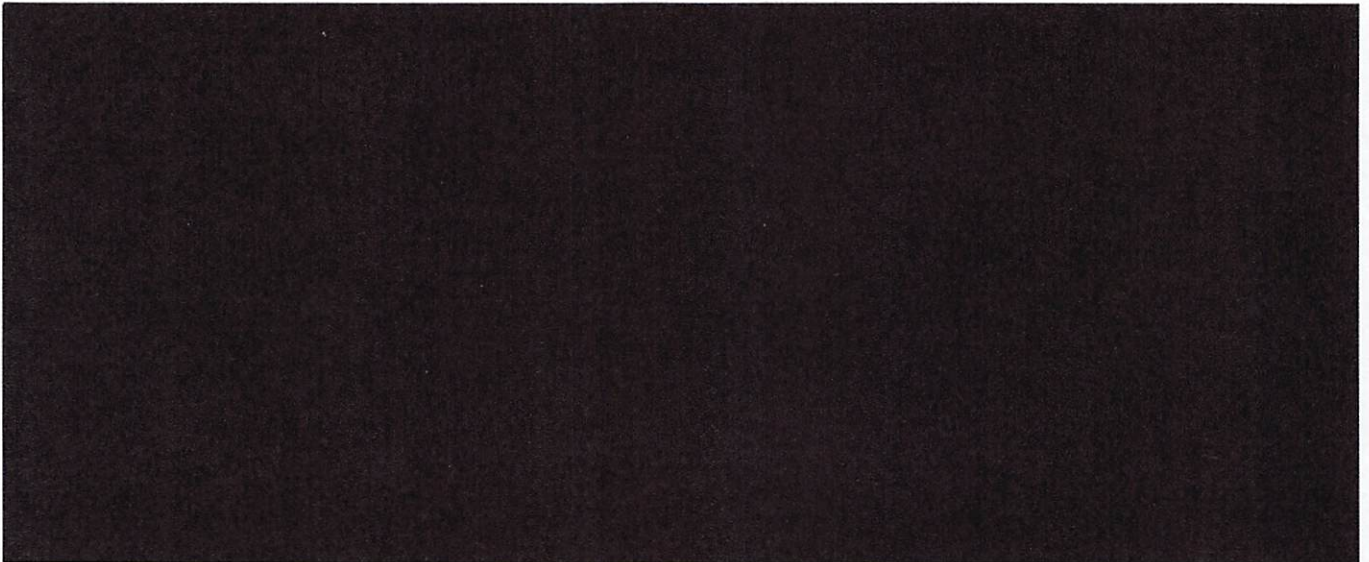
Follow Up Flag: Follow up
Flag Status: Flagged

From: Stuart Axelrod <legalbeagle@hotmail.com>
Sent: Tuesday, October 14, 2025 7:46 AM
To: ruthlemay@me.com; Carla Ericson <carla@gotaxelrod.com>
Subject: Fw: Axelrod - Attorney Client Privileged

From: Joshua Calder <joshua@mclarenandlee.com>
Sent: Friday, October 10, 2025 4:54 PM
To: Stuart Axelrod <legalbeagle@hotmail.com>
Cc: Jim McLaren <jimclaren@mclarenandlee.com>; Michelle Smoak <michelle@mclarenandlee.com>; Renee Smith <Renee@mclarenandlee.com>; Angela M. Parnell <para@mclarenandlee.com>
Subject: Axelrod - Attorney Client Privileged

Dear Stuart,

I spoke with Jim about our conversation on you paying Carla to leave the house. He said he thinks that may work and he would make an offer, but less than what you mentioned to me. Jim did want to put at least a few things out there for the three of us to think on:



[REDACTED]

Jim or I may have more to add after we think on this over the weekend. Let me know if you have any questions.

Thank you,

Josh

=====

Joshua M. Calder, Esquire
Associate Attorney
MCLAREN & LEE, ATTORNEYS
P.O. Box 11809
1508 Laurel Street
Columbia, South Carolina 29211-1809
TEL 803-799-3074
FAX 803-252-3548
E-MAIL Joshua@mclarenandlee.com

This electronic message is from a law firm. It may contain confidential or privileged information. If you received this transmission in error, please reply to the sender to advise of the error and delete this transmission and any attachments.

VH von Herrmann Law Firm
www.vonHerrmannLaw.com

Exhibit B

William B. von Herrmann, Esquire†
bvhlaw00@gmail.com

Heather S. von Herrmann, Esquire
hvh@vhlf.pro

†Certified Civil Court Mediator
*Certified Family Court Mediator

April 27, 2026

VIA E-MAIL & U.S. MAIL

TO: James T. McLaren, Esq.
McLaren & Lee
Attorneys and Counselors at Law
P.O. Box 11809
Columbia, SC 29201
jmclaren@mcclarenandlee.com

Joshua McNeil Calder, Esq.
Calder Law Firm, LLC
1227 16th Avenue, #106
Conway, SC 29526
josh@calder-law.com

RE: *Carla L. Ericson vs. Stuart M. Axelrod*
Case No.: 2025-DR-26-2774

Dear Counsel,

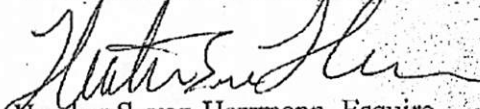
Please find enclosed *Plaintiff's Answers to Defendant's First Set of Interrogatories to Plaintiff* and *Plaintiff's Responses to Defendant's First Set of Requests for Production to Plaintiff*.

Also enclosed is a List of Documents Provided, Flash Drive, Verification, and Certificate of Mailing.

With kind regards, I am

Very truly yours,

VON HERRMANN LAW FIRM


Heather S. von Herrmann, Esquire

HvH/mv

Enclosures: As stated

c: Co-Counsel, Alexandra D. Varner (via e-mail)
Client (via e-mail)

2026 APR 30 AM 11:20
MCLAREN FAMILY LAW
RECEIVED

IN THE FAMILY COURT FOR THE
FIFTEENTH JUDICIAL CIRCUIT

DOCKET NO: 2025-DR-26-2774

**PLAINTIFF'S ANSWERS TO
DEFENDANT'S FIRST SET OF
INTERROGATORIES TO
PLAINTIFF**

Plaintiff,

PLAINTIFF

Defendant.

Ruth LeMay

526 Redwood Avenue

Myrtle Beach, SC 29577

(843) 333-2566

Ruth and Plaintiff have been friends for sixteen (16) years. Ruth would testify as to many aspects of the parties' relationship and Defendant's behavior. No recorded or written statement.

Mary Jones

White Water Road

Myrtle Beach, SC 29579

(843) 658-1232

Mary is a very close friend of Plaintiff. They have discussed all elements of the divorce since Plaintiff discovered Defendant was cheating on her with another woman. Mary offered emotional support. No recorded or written statement.

Plaintiff reserves the right to supplement this answer at a later date.

2. List the names and addresses of any expert witnesses with whom you or your attorney have consulted with or propose to use as a witness at the trial of the case, together with a summary of each expert's expected testimony, and state (a) the subject matter on which the expert or experts are expected to testify; (b) the substance of the facts and opinions to which each of the experts named in response to the preceding interrogatory is expected to testify; (c) furnish a summary of the grounds for each opinion expected to be elicited from each of the experts named in response to this interrogatory; and (d) if you will do so without a Request for Production, Inspection and Copying of Documents, please provide a copy of any written report, memorandum or other written document prepared by each expert witness.

ANSWER: Lester "Chip" Johnson, 712 Charter Lane, Charleston, South Carolina 29072.

- a. Phone/computer forensic examiner and private investigator;**
- b. Testimony on computer and phone examination;**
- c. None at this time; and**

d. None at this time.

Plaintiff reserves the right to supplement this answer at a later date.

3. Set forth a list of photographs, plats, sketches or other prepared documents in your possession that relate to the claim or defense in the case.

ANSWER: Please refer to the attached List of Documents Provided.

Plaintiff reserves the right to supplement this answer at a later date.

4. State the names and addresses of all persons other than your attorney with whom you have discussed your spouse or your matrimonial dispute from the date of separation through the date of your responses, and summarize all comments made by you and such third parties with respect to your spouse or your matrimonial dispute.

ANSWER: Please see answer to Interrogatory #1.

Plaintiff reserves the right to supplement this answer at a later date.

5. Have you, or anyone on your behalf, conducted surveillance or investigated your spouse? If so, please provide the details, including the name and address of the investigator, the dates of surveillance and investigation, the results of such surveillance and investigation, state where such items may be inspected, and if tracking devices were used. Also, list and describe all reports (oral and written), videos, photographs, and other demonstrative evidence resulting from such surveillance and investigation.

ANSWER: An investigation was conducted by Bulldog PI, LLC, 1000 S. Commons Drive, Suite 102, #370, Myrtle Beach, SC 29588. Investigators were Melissa Bridges, Wade Alford, and Taylor King. Full investigation file is attached.

Plaintiff reserves the right to supplement this answer at a later date.

6. During the course of your present marriage, have you or anyone at your direction intercepted, recorded, and/or attempted to intercept or record any of your spouse's or any other person's telephone or other communications? If so, please state the nature and method of interception and/or recording or the attempt to intercept or record, identify the person who

intercepted and/or recorded the communications or attempted to do so, the dates of said interception and/or recordings, and, the custodian of said recordings and/or transcriptions thereof.

ANSWER: Plaintiff placed a recording device in the parties' master bedroom after Plaintiff overheard Defendant having a masturbating session with his mistress, Marylynn Bishop. That device was confiscated by Defendant and Plaintiff never received any data from the device.

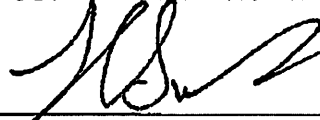
Plaintiff reserves the right to supplement this answer at a later date.

7. From January 1, 2025, to present, have you or anyone at your direction accessed Defendant's email accounts or electronic devices? If so, please state when these accounts/devices were accessed, what emails or documents were reviewed or copied or forwarded, and identify any and all third parties which were sent information or documentation obtained from Defendant's email and identify what specific documentation or information was sent to said third-parties.

ANSWER: Yes, Plaintiff has accessed Defendant's email from the parties' home computer. Plaintiff forwarded certain emails to the witnesses listed above for safekeeping. See Responses to Interrogatory #6 and Request to Produce.

Plaintiff reserves the right to supplement this answer at a later date.

VON HERRMANN LAW FIRM



Heather S. von Herrmann, Esquire
von Herrmann Law Firm
Attorney for Plaintiff
212 Elm Street
Conway, SC 29526
Phone: (843) 488-1030
Fax: (843) 488-1035

Dated: April 27, 2026
Conway, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Carla Ericson,

Plaintiff,

vs.

Stuart M. Axelrod,

Defendant.

) IN THE FAMILY COURT FOR THE
) FIFTEENTH JUDICIAL CIRCUIT

) DOCKET NO: 2025-DR-26-2774

) **PLAINTIFF'S RESPONSES TO**
) **DEFENDANT'S FIRST SET OF**
) **REQUESTS FOR PRODUCTION**
) **TO PLAINTIFF**

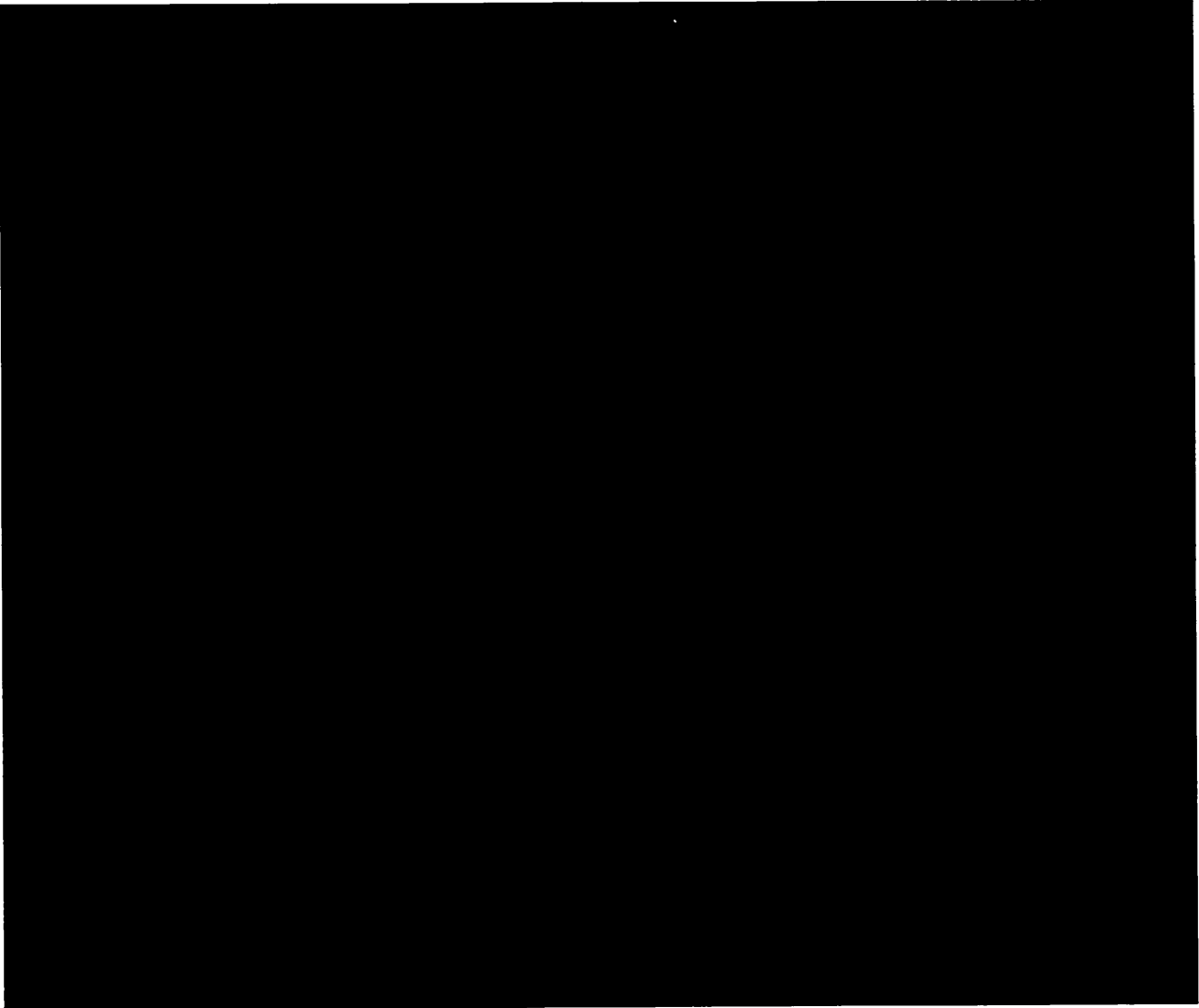
TO: STUART M. AXELROD AND HIS ATTORNEYS, JAMES T. MCLAREN,
ESQUIRE, AND JOSHUA M. CALDER, ESQUIRE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



7. Copies of all emails or other written communications accessed by Plaintiff from any of Defendant's electronic devices or email accounts from January 1, 2025 to present.

RESPONSE: Please see attached copies of:

- 10/10/2025 Email to Stuart Axelrod from Jim McLaren, Michelle Smoak, Renee Smith, and Angela M. Parnell, Subject: Axelrod – Attorney Client Privileged
- 9/22/2025 Email to Stuart Axelrod from Clark Crist, Subject: PFS
- SouthState Bank Confidential Personal Financial Statement dated 5/20/2024
- PSG ProSure Group Continuation Certificate

- 9/26/2025 Email to Stuart Axelrod from Tirsha Vassar, Subject: Invoice 60308 from NORTHGATES IN MOTION, INC. – Reminder Past Due
- 10/1/2025 Adobe Partners, LLC Profit & Loss – All Transactions, Expenses by Vendor Detail 1/2017-12/2017, Expenses by Vendor Detail 1/2018-12/2018, Expenses by Vendor Detail 1/2019-12/2019
- 9/17/2025 Email to Stuart Axelrod from Adam Maciel, Subject: Attention Sanoma Growers
- 10/3/2025 Email to Stuart Axelrod from customerservice@danburymint.com, Subject: Thank you for your order
- 9/16/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Good morning
- 9/17/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Marilynne Bishop shared [REDACTED] with you, with attached letter
- 9/14/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Marilynne Bishop shared [REDACTED] with you, with attached letter
- 9/24/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Fwd: Invitation to appear on WRNN99.5 Morning Show October 2025
- 8/3/2025 Email to/from Stuart Axelrod from/to Marilynne Bishop, Subject: Re:
- 8/21/2025 Email to/from Stuart Axelrod from/to Marilynne Bishop, Subject: Re: [REDACTED]
- 9/22/2025 Email from/to Stuart Axelrod to/from Marilynne Bishop, Subject: Re: Look okay?
- 9/18/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: [REDACTED]
- 8/22/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: [REDACTED]
- 8/17/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: [REDACTED]
- 9/11/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: [REDACTED]
- 9/17/2025 Email from Delta Air Lines to Stuart Axelrod, Subject: Your Flight Receipt – MARILYNNE BISHOP 04OCT25

- 9/17/2025 Email from Delta Air Lines to Stuart Axelrod, Subject: Your Flight Receipt
– STUART AXELROD 04OCT25
- 9/30/2025 Email from Delta Air Lines to Stuart Axelrod, Subject: Your Flight Receipt
– NEIL C ROUGH 04OCT25
- 9/29/2025 Email from Anne Sikorski to Stuart Axelrod, Cc Peter Wechsler, Subject:
Annuity Values
- Fee Contract between Stuart Marc Axelrod and McLaren & Lee, Attorneys at Law
- McLaren & Lee, Attorneys Invoice 9/29/2025
- Client Novel Instructions from McLaren & Lee
- Stuart Axelrod's Biography
- 10/8/2025 History – Payentry for Stuart Axelrod for 1/1/2025 – 12/31/2025
- Ballard & Watson Attorneys at Law letter to Stuart Axelrod dated 10/28/2025
- Handwritten list of assets – Stuart and Carla
- Snapshot of Excel Spreadsheet listing Stuart Axelrod's assets
- 10/13/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Painting added
- 10/8/2025 Email to Shamar Brown, Cc: Stuart Axelrod from Lori Burrow, Subject:
RE: Stuart's Earnings
- 10/9/2025 Email to Lori Burrow, Cc: Stuart Axelrod from Shamar Brown, Subject:
RE: Stuart's Earnings
- 10/10/2025 Email from Joshua Calder to Stuart Axelrod, Cc: Jim McLaren, Michelle
Smoak, Renee Smith, Angela M. Parnell, Subject: Axelrod – Attorney Client
Privileged
- Transaction Record – Sonoma County Agricultural Commissioner 10/9/2025
- 2025 Axelrod YTD Profit & Loss – YTD thru 10.8.2025
- Department of Cannabis Control California, Receipt of Payment 10/6/2025, Paid by
Stuart Axelrod
- Department of Cannabis Control California, Receipt of Payment 10/6/2025, Paid by
Loree Tackmier
- Sonoma County 2025-2026 Property Tax Bill – 3977 Old Adobe Road, Petaluma, CA
94954-9242, 35.61 Acres

- Sonoma County 2025-2026 Property Tax Bill – 3977 Old Adobe Road, Petaluma, CA 94956, 201.10 Acres
- Permit Sonoma – DRAFT Conditions of Approval dated 10/2025
- Notice of Waiver of a Board of Zoning Adjustments Public Hearing for an Existing Cannabis Cultivation Operation, dated 10/2/2025
- 10/7/2025 Email from Your recent Best Western Stay to Stuart Axelrod, Subject: Your recent stay at Best Western Petaluma Inn
- 6/5/2025 Email from Shaun Mordecai to Maggie Furlong, Cc: Haleigh Frye, Subject: Re: 3988 Adobe Rd
- 9/11/2025 Email from Craig Snook to Peter Kiel, Stuart Axelrod, and Vince Goble, Subject: RE: UPC23-0004 (3977 Adobe Rd) Application Completeness Review
- 9/29/2025 Email from David Fambro to Stuart Axelrod, Subject: It's Time To Schedule Your Next Appointment With Peter Wechsler
- Snapshot of Axelrod 401K.PDF
- Anniversary Report – Stuart M Axelrod & Associates
- 7/10/2025 Email from Craig Snook to Peter Kiel, Vince Goble, Cc: Stuart Axelrod, Subject: FW: Axelrod Ericson Schooler Lease
- 10/5/2023 Email from Your Recent Best Western Stay to Stuart Axelrod, Subject: Your recent stay at Best Western Petaluma Inn
- 10/3/2025 Email from Best Western Hotels & Resorts to Stuart Axelrod, Subject: Check-In Now for your Oct-04-2025 stay at Best Western Petaluma Inn

Plaintiff reserves the right to supplement this response at a later date.

****SIGNATURE PAGE TO FOLLOW****

VON HERRMANN LAW FIRM

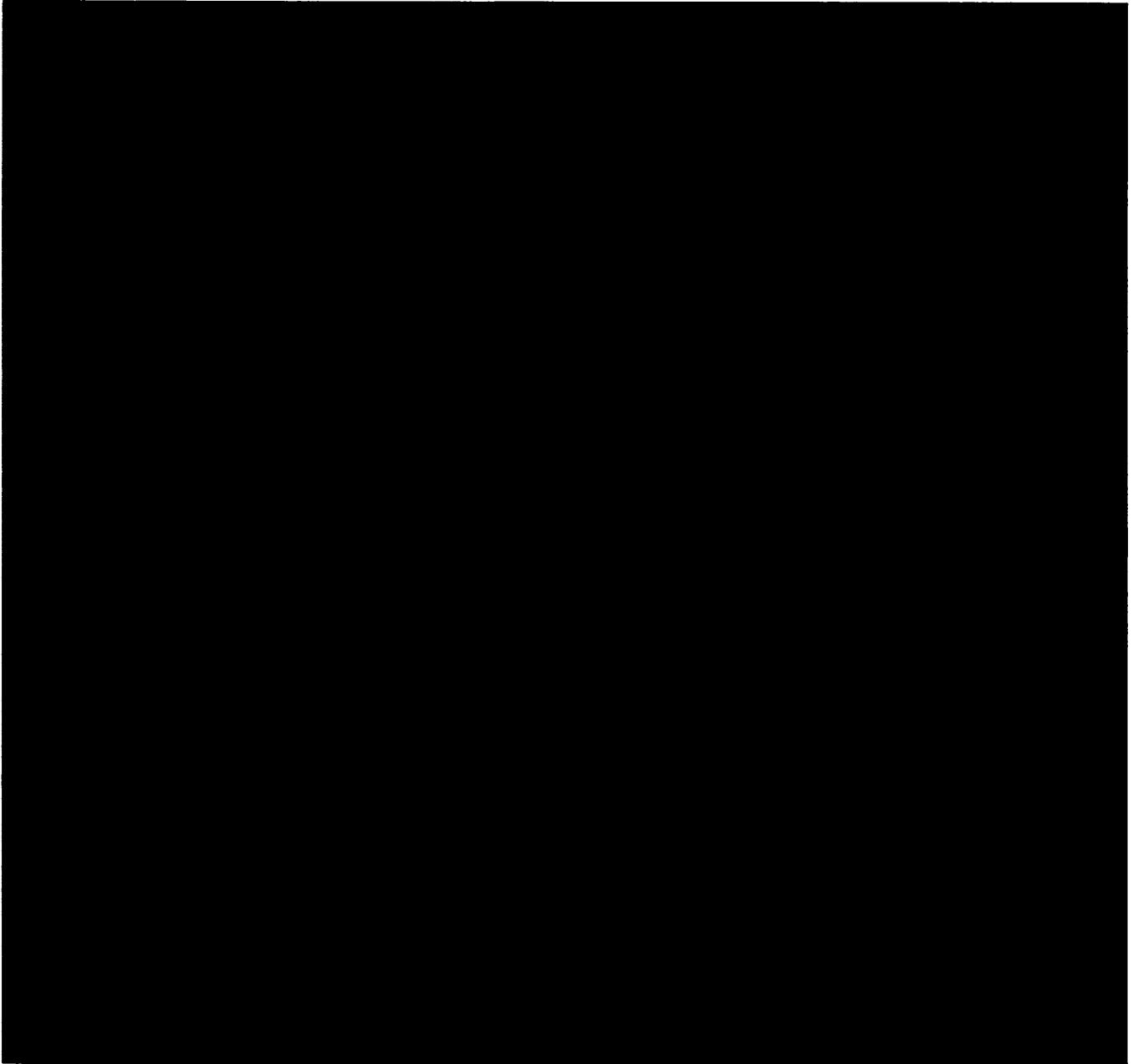


Heather S. von Herrmann, Esquire
von Herrmann Law Firm
Attorney for Plaintiff
212 Elm Street
Conway, SC 29526
Phone: (843) 488-1030
Fax: (843) 488-1035

Dated: April 27, 2026
Conway, South Carolina

List of Documents Provided

Ericson vs. Axelrod



11/18/2024

17. PI Report, pictures and videos – Bulldog PI, LLC

18. Emails and documents obtained from Defendant's computer and/or email:

- 10/10/2025 Email to Stuart Axelrod from Jim McLaren, Michelle Smoak, Renee Smith, and Angela M. Parnell, Subject: Axelrod – Attorney Client Privileged
- 9/22/2025 Email to Stuart Axelrod from Clark Crist, Subject: PFS
- SouthState Bank Confidential Personal Financial Statement dated 5/20/2024
- PSG ProSure Group Continuation Certificate
- 9/26/2025 Email to Stuart Axelrod from Tirsha Vassar, Subject: Invoice 60308 from NORTHGATES IN MOTION, INC. – Reminder Past Due
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- 9/17/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Marilynne Bishop shared “Dearest Stuart1” with you, with attached letter
- 9/14/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Marilynne Bishop shared “Dearest Stuart” with you, with attached letter
- 9/24/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Fwd: Invitation to appear on WRNN99.5 Morning Show October 2025
- 8/3/2025 Email to/from Stuart Axelrod from/to Marilynne Bishop, Subject: Re:
- 8/21/2025 Email to/from Stuart Axelrod from/to Marilynne Bishop, Subject: Re: Subscribe for more #poem #philosophy #poetry #love #quotes #viral
- 9/22/2025 Email from/to Stuart Axelrod to/from Marilynne Bishop, Subject: Re: Look okay?
- 9/18/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Hey, there Delilah!! #heytheredelilah #trending #lyrics #edit
- 8/22/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Heavy Heart
- 8/17/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: CNBC: Psychologist: People in the happiest relationships talk about 5 things every day—that most don’t
- 9/11/2025 Email to Stuart Axelrod from Marilynne Bishop, Subject: Ryan

- 9/17/2025 Email from Delta Air Lines to Stuart Axelrod, Subject: Your Flight Receipt – MARILYNNE BISHOP 04OCT25
- 9/17/2025 Email from Delta Air Lines to Stuart Axelrod, Subject: Your Flight Receipt – STUART AXELROD 04OCT25
- 9/30/2025 Email from Delta Air Lines to Stuart Axelrod, Subject: Your Flight Receipt – NEIL C ROUGH 04OCT25
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- 9/11/2025 Email from Craig Snook to Peter Kiel, Stuart Axelrod, and Vince Goble, Subject: RE: UPC23-0004 (3977 Adobe Rd) Application Completeness Review
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- Snapshot of Axelrod 401K.PDF
- Anniversary Report – Stuart M Axelrod & Associates
- 7/10/2025 Email from Craig Snook to Peter Kiel, Vince Goble, Cc: Stuart Axelrod, Subject: FW: Axelrod Ericson Schooler Lease
- 10/5/2023 Email from Your Recent Best Western Stay to Stuart Axelrod, Subject: Your recent stay at Best Western Petaluma Inn
- 10/3/2025 Email from Best Western Hotels & Resorts to Stuart Axelrod, Subject: Check-In Now for your Oct-04-2025 stay at Best Western Petaluma Inn

COPY

STATE OF SOUTH CAROLINA)

COUNTY OF HORRY)

Carla L. Ericson,)

Plaintiff,)

vs.)

Stuart M. Axelrod,)

Defendant.)

IN THE FAMILY COURT FOR THE
FIFTEENTH JUDICIAL CIRCUIT
CASE NO.: 2025-DR-26-2774

VERIFICATION

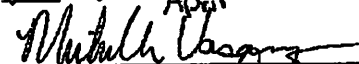
PERSONALLY appeared before me the Plaintiff in the foregoing action, who being duly sworn, deposes and says:

- (a) That this Deponent has read *Plaintiff's Answers to Defendant's First Set of Interrogatories to Plaintiff* and *Plaintiff's Responses to Defendant's First Set of Requests for Production to Plaintiff*.
- (b) That the *Plaintiff's Answers to Defendant's First Set of Interrogatories to Plaintiff* and *Plaintiff's Responses to Defendant's First Set of Requests for Production to Plaintiff* prepared by this Deponent's attorney are based upon information this Deponent has personally furnished to said attorney.
- (c) That *Plaintiff's Answers to Defendant's First Set of Interrogatories to Plaintiff* and *Plaintiff's Responses to Defendant's First Set of Requests for Production to Plaintiff* are true and correct and are based upon the personal knowledge of this Deponent, and, as to those, this Deponent verily believes the same to be true.
- (d) That this Deponent has authorized said attorney to present *Plaintiff's Answers to Defendant's First Set of Interrogatories to Plaintiff* and *Plaintiff's Responses to Defendant's First Set of Requests for Production to Plaintiff* to Defendant's counsel.
- (e) That this Deponent understands that this Verification is sworn to and given under oath.


Carla L. Ericson, Plaintiff

SWORN to before me this

27th day of ~~March~~ ^{April}, 2026.



Notary Public of South Carolina

My Commission Expires 1-2-2029



STATE OF SOUTH CAROLINA
COUNTY OF HORRY

**IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT
CASE NO.: 2025-DR-26-2774**

Carla L. Ericson.

Plaintiff,

vs.

Stuart M. Axelrod,

Defendant.

CERTIFICATE OF MAILING

I, Michelle Vasquez, of the von Herrmann Law Firm, certify that I have this day emailed and mailed a copy of the document(s) listed below, with sufficient postage attached thereto, as follows:

DOCUMENT(S):

- **Plaintiff's Answers to Defendant's First Set of Interrogatories to Plaintiff**
- **Plaintiff's Responses to Defendant's First Set of Requests for Production to Plaintiff**
- **List of Documents Provided**
- **Verification**
- **Flash Drive**
- **Certificate of Mailing**

ADDRESSEE:

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Michelle Vasquez

Dated: April 27, 2026