

RECEIVED

Sep 30 2026

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

ORIGINAL JURISDICTION

Appellate Case No. 2026-000713

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

Ex Parte:

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.

RESPONDENTS' SUPPLEMENTAL APPENDIX

John S. Nichols
SC Bar No. 4210
Bluestein Thompson
Sullivan, LLC
post Office Box 7965
Columbia, South Carolina
29202
(803) 779-7599

Mark B. Tinsley
SC Bar No. 15597
Gooding & Gooding, PA
Post Office Box 1000
Allendale, SC 29810
(803) 584-7676

Roberts "Tabor" Vaux, Jr.
SC Bar No. 77421
Vaux Marcher Berglind, PA
Post Office Box 769
Bluffton, South Carolina
29910
(843) 757-2888

Attorneys for Beach/Tuten Respondents

INDEX

Order of September 14, 2026	1
Exhibit A to July 26, 2026 Email to Court	8
Documents Initially Submitted to Circuit Court under Seal	31

STATE OF SOUTH CAROLINA)
COUNTY OF SPARTANBURG)

IN THE COURT OF COMMON PLEAS
SEVENTH JUDICIAL CIRCUIT

RENEE S. BEACH, PHILLIP BEACH,)
ROBIN BEACH, SAVANNAH TUTEN)
and SETH TUTEN,)

CASE NO. 2026-CP-42-04208

Plaintiffs,

v.

**ORDER REGARDING
THE PARKERS DEFENDANTS'
AMENDED MOTION TO
CONFIRM CONFIDENTIALITY
DESIGNATIONS**

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

Defendants.

Defendants Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Blake Greco, and Jason D'Cruz (the "Parkers Defendants") filed an amended motion for this Court to "confirm confidential designations" regarding their document production. Plaintiffs Renee S. Beach, Phillip Beach, Robin Beach, Savannah Tuten and Seth Tuten ("Plaintiffs") filed a response contending the Parkers Defendants' designations with regard to certain documents did not meet the test of the Confidentiality Order this Court entered on December 31, 2025, and the designations should be removed on the subset of documents Plaintiffs desired to file with the Supreme Court of South Carolina in *Ex parte Roman v. PNC Financial Services Group, Inc.*, App. Case No. 2026-000713 (S.C. Sup. Ct. 2026), a collateral matter pending in that Court's original jurisdiction. Pursuant to Paragraph 7 of the Confidentiality Order and Rule 41.1, SCRCF, Plaintiffs provided the documents to the Court under seal.

On August 25, 2026, the Parkers Defendants notified Plaintiffs that they removed the "confidential" designation to one portion of the documents, so there is no issue regarding those particular documents before the Court. The Court held a WebEx conference on September 8, 2026, to discuss whether to order the removal of Defendants' "Confidential" designation as to the remaining documents identified as "Exhibit A" in an email to the Court dated July 26, 2026.

The Court has reviewed the filings by the parties and had discussions on this issue at the WebEx conference. After consideration of the arguments, review of the Confidentiality Order, and review of the parties' filings, the Court makes the following rulings as to the documents identified as "Exhibit A" to the July 26, 2026, email.¹

The Confidentiality Order this Court entered on December 31, 2025, provides:

3. **Documents Which May be Designated Confidential.** Any party may designate documents as confidential but only after review of the documents by an attorney who has, in good faith, determined that the documents contain information protected from disclosure by statute, sensitive personal information, trade secrets, or confidential research, development, or commercial information. Information or documents which are available in the public sector may not be designated as confidential.

(Order, p. 2, ¶ 3, 5). The Order provides further:

9. **Challenges to Designation as Confidential.** Any CONFIDENTIAL designation is subject to challenge. The following procedures shall apply to any such challenge:

¹ The parties also discussed the Parkers Defendants' designations regarding all of the remaining documents the Parkers Defendants produced. However, the only issue before the Court at this time is whether the Court should confirm the Parkers Defendants' designation of the documents contained in Exhibit A as "confidential." Nothing in this Order should be construed to address any other issue.

- a. The burden of proving the necessity of a Confidential designation remains with the party asserting confidentiality.
- b. A party who contends that documents designated CONFIDENTIAL are not entitled to confidential treatment shall give written notice to the party who affixed the designation of the specific basis for the challenge. The party who so designated the documents shall have fifteen (15) days from service of the written notice to determine if the dispute can be resolved without judicial intervention and, if not, to move for an Order confirming the Confidential designation.
- c. Notwithstanding any challenge to the designation of documents as confidential, all material previously designated CONFIDENTIAL shall continue to be treated as subject to the full protections of this Order until one of the following occurs:
 - (1) the party who claims that the documents are confidential withdraws such designation in writing;
 - (2) the party who claims that the documents are confidential fails to move timely for an Order designating the documents as confidential as set forth in paragraph 9.b. above; or
 - (3) the court rules that the documents should no longer be designated as confidential information.
- d. Challenges to the confidentiality of documents may be made at any time and are not waived by the failure to raise the challenge at the time of initial disclosure or designation.

(Order of Dec. 31, 2025, pp.; 5-6, ¶ 9).

Pursuant to Paragraph 9(b) of the Confidentiality Order, Plaintiffs notified the Parker Defendants in writing of their challenge to the manner in which the Parker Defendants designated these particular documents as "Confidential." The Parker Defendants timely moved

pursuant to Paragraph 9(b) for an Order confirming their Confidential Designations as to the documents Plaintiffs seek to use in the *Roman* matter.

Regarding the specific documents contained in Exhibit A, the Court first rules that these materials are not protected by the attorney-client privilege or the attorney work product doctrine. Those issues have been decided by previous orders entered in this case. *See, e.g., Deloitte & Touche, LLP v. Unisys Corp.*, 358 S.C. 179, 184 n.3, 594 S.E.2d 523, 525 n.3 (2004) (“one circuit judge does not have the power to review, modify, affirm or reverse the findings of another circuit judge”).

Next, the Court deems that the documents contained in Exhibit A are not confidential under Paragraph 3 of the Confidentiality Order. That paragraph requires that a document meet one of the following tests:

- (1) the document must contain information protected from disclosure by statute;
- (2) the document must contain sensitive personal information;
- (3) the document must contain a trade secret; or
- (4) the document must contain confidential research, development, or commercial information.

Order of 12/31/25, p. 2, ¶ 3). The documents in Exhibit A meet none of these tests.

The Parkers Defendants contend the documents contain “strategy and communications in navigating potential [civil] liability” and “confidential commercial information about the business strategy of responding to legal liabilities” related to the Parkers Defendants’ efforts to mitigate their civil liability in the *Beach v. Gregory M. Parker, Inc.*, No. 2019-CP-25-00111 (the “Boat Crash litigation”), and therefore the documents meet the fourth test under Paragraph 3 set

forth above. However, after reviewing the subject materials the Court finds these materials are not confidential commercial information as contemplated by Paragraph 3. *Cf. Rech v. Wal-Mart Stores E., L.P.* No. 8:19-cv-2514 (D.S.C. 2020), 2020 WL 3396723, at *2 (“Confidential commercial information has been defined as important proprietary information that provides the business entity with financial or competitive advantage when it is kept secret and results in competitive harm when it is released to the public.”).

The Parkers Defendants also contend “the materials generated belong to Mr. Parker and his attorneys” and a nondisclosure agreement among them deems all of this material to be “proprietary and confidential.” However, Paragraph 3 does not provide the Parkers Defendants may designate materials claimed to be “proprietary” as “confidential.” Rather, strictly construing the terms of the Confidentiality Order, the documents must meet one of the four (4) tests set forth in Paragraph 3. *See, e.g., DePuy Synthes Products, Inc. v. Veterinary Orthopedic Implants, Inc.*, 990 F.3d 1364, 1370 (2021) (parties seeking confidentiality must present a strong justification to overcome the presumption of public access; “where a protective order purports to address the confidentiality of information on the public docket, the presumption of public access applies - and [courts] have an independent duty to protect the public’s right of access - even when the parties agree to maintain confidentiality of publicly filed information pursuant to a protective order”).

Lastly, the Parkers Defendants claim that they have “legitimate concerns” that protected documents may be disseminated to third parties. The Parkers Defendants provided no proof that anyone has used confidential documents in any manner in violation of the December 31, 2025, Confidentiality Order. Even so, Plaintiffs completely complied with Paragraph 9 and then

Paragraph 7 (filing under seal) of the Order and withheld the documents from the Supreme Court filing pending a ruling by this Court. Furthermore, the Court deems the documents contained in Exhibit A are not confidential as defined by Paragraph 3.

For the reasons stated the documents contained in Exhibit A are deemed not confidential. Plaintiffs are permitted to use these documents accordingly, including filing them with the Supreme Court in the *Roman* matter.

IT IS SO ORDERED.



Spartanburg Common Pleas

Case Caption: Renee S. Beach , plaintiff, et al VS Gregory M. Parker , defendant, et al
Case Number: 2026CP4204208
Type: Order/Other

It is so Ordered.

s/ R. Keith Kelly - 2165

Electronically signed on 2026-09-14 16:04:08 page 7 of 7

EXHIBIT A

Documents Plaintiffs Propose to Include
in the Appendix with the Supreme Court

CONFIDENTIAL

Witness Deposition	Tinsley	Vaux	Griffith	Dean	Tillar	Bower
CONFIDENTIAL	CONFIDENTIAL		CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL
Morgan Doughty (B)	Present 20 objections	Present		145 pages		4 pages 5 objections
Miley Altman (B)	2 pages 12 objections	Present	122 pages			6 pages 1 objection
Connor Cook (B)	Present 12 objections	Present	134 pages			Present 4 objections
Buster Murdaugh	5 pages 5 objections		80 pages	Present	Present 2 objections	Present
Aaron Jambriska (O)	39 pages	Present	47 pages	Present		Present
Ken Labadie (P)	25 pages		Present	Present		Present
Kevin Long (P)	69 pages	Present	Present 8 objections	Present		Present
Mark Marcelar (O)	15 pages		5 pages	Present		1 page
Sarah Bragg (P)	62 pages	Present	Present 4 objections	Present		Present
Shane Patterson (W)	3 pages 14 objections	Present	40 pages	Present	Present	
Shayna Gadson (P)	39 pages 4 objections	Present	18 pages 2 objections	Present		Present
Steven Domino (O)	11 pages 1 objection	Present	47 pages	Present		Present 2 objections
Tajecha Cohen (P)	92 pages 10 objections	Present	25 pages 24 objections	Present		Present
Jeff Bush (P)	41 pages	Present	2 pages 4 objections	Present		Present
Blake Greco (P)	20 pages	Present	Present 5 objections	Present		Present

CONFIDENTIAL

1/20/22, 3:06 PM

Gmail - 4.9.21 Parker's Strategy Memo



Wesley Donahue <wesleydonahue@gmail.com>

4.9.21 Parker's Strategy Memo

2 messages

Christlana Purves <christlana@laurensgruop.com> Fri, Apr 9, 2021 at 4:01 PM
To: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdoruz@bakerlaw.com>
Cc: Wesley Donahue <wesleydonahue@gmail.com>, Marisa Brandt <marisa@laurensgruop.com>, Lynn Stokes-Murray <lstokes-murray@burr.com>, SBruning@burr.com

Good afternoon,

Attached is a strategy memo detailing our plan to utilize traditional press, coalitions and legislative avenues to benefit Parker's.

Let us know if there are any questions/concerns and if you'd like to find time to discuss.

Hope everyone has a great weekend.

Thanks,
Christlana

@Christlana Purves
Vice President
770-666-5103
Laurensgruop.com

4.9.21 Parker's Strategy Memo.pdf
106K

Christlana Purves <christlana@laurensgruop.com> Mon, Apr 12, 2021 at 1:55 PM
To: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdoruz@bakerlaw.com>
Cc: Wesley Donahue <wesleydonahue@gmail.com>, Marisa Brandt <marisa@laurensgruop.com>, Lynn Stokes-Murray <lstokes-murray@burr.com>, SBruning@burr.com

Jual wanted to circle back and see if there were any thoughts on this. We'll be sending around a calendar invite for our weekly calls on Tuesday shortly.

> On Apr 9, 2021, at 4:01 PM, Christlana Purves <christlana@laurensgruop.com> wrote:
>
> Good afternoon,
> [Quoted text hidden]
> <4.9.21 Parker's Strategy Memo.pdf/>
>
>
> @Christlana Purves
> Vice President
> 770-666-5103
> Laurensgruop.com
>

<https://mail.google.com/mail/u/0/?ik=d2e1ad2234&vt=smtp&search=all&permthid=thread-f903A1696594374955962148&siml=insg-1963A1696594374955962148...> 1/1

CONFIDENTIAL LAURENSGROUP_001081

CONFIDENTIAL

1/28/21, 3:38 PM

Gmail - Daily Laurens Group Update - February 2, 2021



Wesley Donohue <wesleydonohue@gmail.com>

Daily Laurens Group Update - February 2, 2021

1 message

Marisa Brand <marisa@laurensagroup.com>

Tue, Feb 2, 2021 at 4:48 PM

To: Wesley Donohue <wesleydonohue@gmail.com>, Christellana Purves <christellana@laurensagroup.com>, Tim Kelly <tim@pushdigital.com>

Action Items

- Set up calls with investment firms for Was - Christellana/Marisa
- Finalizing pitch deck for investment groups - Christellana/Marisa
- Develop Was' media/press plan - Christellana/Marisa/Tim
- Start developing pitch for NRA - Christellana
- Continue BizDev research - Marisa/Tim/Intorn
- Finalize SmallBiz Op-Ed - Was/Marisa

Other Things in the Works

- Parker's approval for research and PI - We've sent over the updated PI contract, Jason has not sent the engagement letter to Georgetown Group. We've requested to see that research as well, Jason is waiting on Greg to sign off on the research before sending.
- Reviewing LG ad budget
- Podcast logistics

Completed Items

- Sent pitch to Northeast Processing
- South Carolina hedge fund research
- Research group and PI for Parker's

Marisa Brand
Director of Laurens Group
714-363-7386

Laurens Group

**PUSH
DIGITAL**

<https://mail.google.com/mail/u/0/?ik=d261e42334kyjow=pt&search=all&permmsgid=thread.163A1690621728048837623&siml=tag-163A1690621728048837623> 1/1

CONFIDENTIAL LAURENSGROUP_001108

CONFIDENTIAL

Subject: Re: 3.12.21 Parker's Update
Date: Saturday, March 20, 2021 at 5:48:47 PM Eastern Daylight Time
From: Christianna Purves <christiana@laurensigroup.com>
To: Jason D'Cruz <jdcruz@bakerlaw.com>
CC: Marisa Brand <marisa@laurensigroup.com>

The research group has everything put together and is ready to release the book to us, but needs half of the invoice paid before they do that. Have you all sent the \$12,500 yet?

> On Mar 12, 2021, at 4:02 PM, Christianna Purves <christiana@laurensigroup.com> wrote:

>

> Hey Jason —

>

> We've attached a few items to this email.

>

> 1. Update to send to the group — this outlines the pitch we are taking to FitNews next week. Let me know if you have any issues with that.

> 2. Pricing memo we discussed. Let me know if that needs to be adjusted.

> 3. Invoice from Georgetown Group — \$12,500 is due now and the remaining \$12,500 is due once we have the completed book.

>

> Let us know if you need anything else.

>

> Thanks!

> Christianna

>

> <3.12.21 Parker's Update.pdf>

> <Parker's Expenses Memo.pdf>

>

> <Baker Hostetler Invoice 022321A.doc>

>

> Christianna Purves

> Vice President

> 770-656-5103

> Laurensigroup.com

>

>

>

Page 229 of 349

CONFIDENTIAL LAURENSGROUP_003026

CONFIDENTIAL

Monday, April 4, 2022 at 15:45:38 Eastern Daylight Time

Subject: Re: 3.3.21 Parker's Update

Date: Wednesday, March 3, 2021 at 3:59:45 PM Eastern Standard Time

From: Christina Purves <christiana@laurensgruip.com>

To: Wesley Donehue <wesleydonehue@gmail.com>

CC: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>, Marisa Brand <marisa@laurensgruip.com>

Yes, we paid the \$2,500.

On Mar 3, 2021, at 3:57 PM, Wesley Donehue <wesleydonehue@gmail.com> wrote:

Did you tell the research team that I would cover the extra cost beyond what Jason wanted to pay?

On Wed, Mar 3, 2021 at 3:32 PM Christina Purves <christiana@laurensgruip.com> wrote:

Hi Greg and Jason —

Attached you will find an update on where we are with pitching Parker's narrative to the press. The PI has been in the field tracking Buster and was able to confirm the vehicle Paul is driving. She has trackers on both of the vehicles and will use those to track their habits, and ultimately catch Paul acting halligant.

The research team has begun expanding upon the existing research and organizing the existing research into a format we can use to start pitching aspects of our narrative. Contract is signed and I believe they've sent the initial invoice to Jason.

Let me know if you all would like to schedule a call with the PI. She will continue to upload surveillance and reports to our Murdaugh folder.

Thank you!
Christiana

Page 257 of 349

CONFIDENTIAL LAURENSGROUP_003054

CONFIDENTIAL

Subject: PI Update on Murdaugh

Date: Tuesday, March 2, 2021 at 11:48:07 AM Eastern Standard Time

From: Christiana Purves <christiana@laurensgruop.com>

To: Jason D'Cruz <jdcruz@bakerlaw.com>

CC: Marisa Brand <marisa@laurensgruop.com>

Hi Jason —

The PI uploaded a report from her surveillance this weekend and verification of Paul's vehicle. A GPS tracker has been placed on his truck. Let me know if you have issues accessing the folder. Thanks!

<https://www.dropbox.com/sh/gjymbwae044wrr/AACymMkZYZIFt0Sf0BHKGED6a?dl=0>

Christiana Purves
Vice President
770-656-5103
Laurensgruop.com

Page 260 of 349

CONFIDENTIAL LAURENSGROUP_003057

CONFIDENTIAL

To: D'Cruz, Jason <jdcruz@bakerlaw.com>
Cc: John Neumann <jneumann@georgetowngroup.com>; wesley@pushdigital.com; Marisa Brand
<marisa@pushdigital.com>
Subject: Re: Research for Parker's

Hey John --

Spoke with Jason this afternoon and he'd like the contract to be between you all and BakerHostetler LLP.
Jason is also finalizing the current research they have to send over to you, as well as the engagement
letter.

Thanks!
Christina

On Jan 22, 2021, at 9:42 AM, D'Cruz, Jason <jdcruz@bakerlaw.com> wrote:

John,

Give me a call at your convenience. 404-457-7601. Thanks.

From: John Neumann <jneumann@georgetowngroup.com>
Sent: Thursday, January 21, 2021 5:49 PM
To: Christina Purves <christiana@laurensgroup.com>
Cc: D'Cruz, Jason <jdcruz@bakerlaw.com>; wesley@pushdigital.com; Marisa Brand
<marisa@pushdigital.com>
Subject: Re: Research for Parker's

[External Email: Use caution when clicking on links or opening attachments.]

Thanks Christina. Glad to look over any existing research that Jason can provide.

On Jan 21, 2021, at 4:38 PM, Christina Purves
<christiana@laurensgroup.com> wrote:

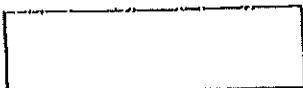
Hi John --

Wanted to put you on an email with Jason who works for Greg Parker to discuss
the proposal you sent over to us earlier. Jason has some research that they've
done internally that may reduce the amount of research needed from you all,
but wanted you to take a look and give us your thoughts.

I'll let Jason send over the research they have on this case. And so you
everyone has it at the top of their inbox, I've attached the research proposal
from John.

Thanks,
Christina

Christiana Purves
Vice President
770-858-6103 (Cell)



<Research Proposal.doc>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any fax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that may present in this email, or any attachment, that have arisen as a result of e-mail transmission.

No engagement letter. We will enter into your contract. Please send so I can review. As we discussed, please insert a modest retainer so we can send the information to you and then you can revise the quote for services. Thanks.

From: Christiana Purves <christiana@laurengroup.com>

Sent: Friday, February 5, 2021 8:24 PM

To: D'Cruz, Jason <jdcruz@bakarlaw.com>

Cc: John Neumann <jneumann@georgetowngroup.com>; Wesley@pushdigital.com; Marisa Brand <marisa@pushdigital.com>

Subject: Re: Research for Parker's

Hey John —

CONFIDENTIAL

Monday, April 4, 2022 at 1:48:48 Eastern Daylight Time

Subject: Re: 1.29.21 Parker's Update

Date: Thursday, February 4, 2021 at 8:01:13 PM Eastern Standard Time

From: Greg Parker <gparker@parkersav.com>

To: D'Cruz, Jason <jdcruz@bakerlaw.com>

CC: Christiana Purves <christiana@laurensgruop.com>, Wesley Donehue <wesleydonehue@gmail.com>, Marisa Brand <marisa@pushdigital.com>

Please

Sent from my iPhone

On Feb 4, 2021, at 5:58 PM, D'Cruz, Jason <jdcruz@bakerlaw.com> wrote:

For attorney client privilege issues, Baker should engage her. Thanks.

From: Christiana Purves <christiana@laurensgruop.com>

Sent: Tuesday, February 2, 2021 1:49 PM

To: gparker@parkersav.com; D'Cruz, Jason <jdcruz@bakerlaw.com>

Cc: Wesley Donehue <wesleydonehue@gmail.com>; Marisa Brand

<marisa@pushdigital.com>

Subject: Re: 1.29.21 Parker's Update

[External Email: Use caution when clicking on links or opening attachments.]

Jason -- I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thanks!

> On Jan 29, 2021, at 10:42 AM, Christiana Purves <christiana@laurensgruop.com> wrote:

>

>

> Good morning,

>

> Attached you will find an update on where we are with the strategy we discussed to begin changing the narrative in support of Parker's. The two main items we need in order to begin working with reporters are the research to develop a road map and citations for the press, and a private investigator to verify Paul Mordough's reckless behavior and discover additional information on the players in this case.

>

> Let us know if you need anything else from us to lockdown the research firm and private investigator or if you'd like to discuss any of this further.

>

> Thank you!

> Christiana

> <Parker's Update 1_29_21.pdf>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Page 298 of 349

CONFIDENTIAL LAURENSGROUP_003093

CONFIDENTIAL

Subject: Re: Parker's Strategy Memo from Laurens Group
Date: Tuesday, January 26, 2021 at 8:46:50 PM Eastern Standard Time
From: Christiana Purves <christiana@laurensgruop.com>
To: D'Cruz, Jason <jdcruz@bakerlaw.com>
CC: Kingsley Roda <kingsley@pushdigital.com>, Marisa Brand <marisa@pushdigital.com>, gparker@parkersav.com <gparker@parkersav.com>, wesley@pushdigital.com <wesley@pushdigital.com>

Attachments: Image001.png

No. However, she works with several prominent attorneys in the area and comes recommended by a colleague.

On Tue, Jan 26, 2021 at 8:20 PM D'Cruz, Jason <jdcruz@bakerlaw.com> wrote:

Have you used this investigator before?

From: Christiana Purves <christiana@laurensgruop.com>
Sent: Tuesday, January 26, 2021 6:07 PM
To: D'Cruz, Jason <jdcruz@bakerlaw.com>; gparker@parkersav.com
Cc: wesley@pushdigital.com; Marisa Brand <marisa@pushdigital.com>; Kingsley Roda <kingsley@pushdigital.com>
Subject: Re: Parker's Strategy Memo from Laurens Group

Good evening,

We have identified an excellent private investigator from SC who knows the state and the Beaufort/Hampton area well. She has already done preliminary research on Paul, the family, the lawyers and others involved in this case and she is confident that she'll be able to track Paul, get photos/videos of him partying and being reckless at bars, but will also track down any hidden assets and investigate the connections between the lawyers and others.

After just the initial look into this case, she can already tell there's a lot to be uncovered here. She can be in Hampton County as early as tomorrow and begin tracking his movements. She will begin working covert until we get what we need on Paul and the family, to be sure no one is tipped off.

I've attached the proposal to this email. Let us know what you all think and if you want to discuss, but we think we should get her on board as soon as possible so she can start giving us reports.

Page 311 of 349

CONFIDENTIAL LAURENSGROUP_003108

Best,
Christinna

On Wed, Jan 20, 2021 at 4:44 PM Christinna Purves <christinna@laurensigroup.com> wrote:

Good afternoon,

Following up on the research aspect of the strategy memo. Attached is a proposal from Georgetown Group. The price is a little higher than we initially expected due to the complex nature of the research needed, but we think we should move forward on the initial \$30,000. Let us know your thoughts.

Best,
Christinna

Christinna Purves
Vice President
770-888-8103 (Cell)



On Wed, Jan 20, 2021 at 11:17 AM Marisa Brand <marisa@pushdigital.com> wrote:

Good morning!

I'm adding Kingsley here to help us set up a call to walk through this plan for the end of the week or early next week.

Thanks,
Marisa

On Fri, Jan 15, 2021 at 12:08 PM D'Cruz, Jason <jdcruz@harkerlaw.com> wrote:

Let's discuss. I have some concerns about FITS news approach.

CONFIDENTIAL

Monday, April 4, 2022 at 15:44:25 Eastern Daylight Time

Subject: Daily Memo
Date: Wednesday, May 12, 2021 at 11:50:37 AM Eastern Daylight Time
From: Wesley Doneluo <wesley@pushdigital.com>
To: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerluw.com>
CC: Christiana Purves <christiana@laurensigroup.com>, Marisa Brand
<marisa@pushdigital.com>, Stokes-Murray, Lynn <LStokes-Murray@burr.com>, Bruning,
Shannon <SBruning@burr.com>
Attachments: Parker's Update 5_11_21.pdf

Greg, I am sending today's memo because I have added some notes that I really need you to read. I have posted them here also:

Many orison have started with "X reporter is my friend." **NO REPORTER IS YOUR FRIEND.**

A lot of us have good relationships with the press, but we always need to remember that they have their own agendas and cannot be trusted as "friends or friendly." There are members of the press who can be allies, but if they are claiming they can be trusted to write a story in the light you'd like yourself or the problem to be told, they are not being truthful or they are corrupt.

The job of the press is to report on the news, even though most of them have their own agendas. The ones we find who have less of a bias than others are still expected to report on the issue, so if something is said on or off the record that is off color or that peaks their interest, we should expect it to be on the front page of the paper the next morning. We know we're stating the obvious, but just want everyone to keep that in the back of their minds when engaging with reporters no matter how friendly they may be towards us.

Greg, I am extremely concerned that you are talking to reporters that you deem as friendly and I am especially worried that you are talking to national reporters without us involved. We all agreed on a press strategy - local papers first. This is because we are more likely to sway local reporters with the angle we want. We can then take those local stories to the national press. National press is way more likely to follow the angle of a local reporter than an angle we are pushing.

Greg, even more so, I am VERY concerned with the way you can come across to these reporters. I know it's hard sometimes to see yourself from the view of a reporter, legislator or even a potential juror because you're in the middle of the lawsuit, but you are a very wealthy CEO who might come across as playing the victim when a young woman was killed. One state

Page 28 of 849

CONFIDENTIAL LAURENSGROUP_002625

CONFIDENTIAL

senator told me exactly that.

Again, I want to emphasize - THIS IS NOT A NORMAL BUSINESS STORY. A young woman is dead and you could be held financially liable. The image is not good at all. You could very easily be labeled as the wealthy gas tycoon who doesn't care about a dead girl as long as you can stay in business and get richer. We all know that is absolutely not true, but that is how the other side will try to define you. That's exactly how I expect Dick Harpoatlian to frame you on the Senate floor.

That's also the way you could come across to a reporter if you aren't incredibly careful. And truthfully, if you don't slow down and stop looking so aggressive, that's exactly the way I think this will end up. Why take the risk? Slow down, let us handle the reporters. Keep yourself away from reporters until we need you. Do a cost benefit analysis of this and you will see that the benefits could come at extreme cost to your reputation and your legacy.

I know you are annoyed by how slow this is happening but I ask you to take note of a few things. During COVID when businesses are struggling to even stay open and have way bigger fish to fry than this issue, we have made it a top issue for leading associations. The Majority Leader of the Senate is sponsoring a bill with an all-star roster of cosponsors. We just got the research back 46 days ago and pitched this story to reporters three weeks ago, with two of them at the P&O meeting to get this thing done. No one has reported on this yet, so it will understandably take a little longer while the reporters get a grasp on the issue. We need to slow down, stick to the strategy and stop making moves that could get you in trouble.

Another item to note is the ultimate press strategy for Parker's. As discussed, the best case scenario would be to have the press start looking into joint and several liability issues and connect them to Harpoatlian in order to ultimately have the jury view Parker's in the best light and see the Murdaugh's for who they are. In order to do this, we need the local press to first report on this issue. Hampton and Beaufort County residents will read the Post and Courier, the State, the Hilton Head Island Packet, the Beaufort Gazette before they read national papers.

Wesley Donahue
CEO
843.460.7990 (cell)
843.2256520 (office)

CONFIDENTIAL

you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

Wesley Donahue
CEO
848.460.7990 (cell)
848.2256528 (office)

Subject: Re: April 14th
Date: Tuesday, April 6, 2021 at 11:57:09 AM Eastern Daylight Time
From: Wesley Donahue <wesley@pushdigital.com>
To: Greg Parker <gparker@parkersav.com>
CC: Bruning, Shannon <SBruning@burr.com>, Christiana Purves
<christiana@laurensigroup.com>, Stokes-Murray, Lynn <LStokes-Murray@burr.com>
Attachments: Image001.png

Ok,

Will — anything salacious.

P&C - substantive issue stuff.

On Tue, Apr 6, 2021 at 11:44 AM Greg Parker <gparker@parkersav.com> wrote:

I continue to wonder if the Post and Courier is a better vehicle for tort reform. I have a great relationship with them already. At what point do we try to use them rather than Will? Will might be a great partner for the Murlaugh's but the P&C might be better for tort reform. Wesley please include this in your strategy memo. G

Greg Parker

CEO

The Parker Companies

17 W. McDonough St.

Savannah, GA 31401

www.parkersav.com

Office: 912.721.2881

Page 164 of 459

CONFIDENTIAL LAURENSGROUP_000539

CONFIDENTIAL

1/28/22, 9:27 PM

Gmail - 3.3.21 Parker's Update



Wesley Donohue <wesleydonohue@gmail.com>

3.3.21 Parker's Update

3 messages

Christiana Purves <christiana@laurensgrupp.com>

Wed, Mar 3, 2021 at 3:32 PM

To: Greg Parker <gparker@parkeradv.com>, Jason D'Cruz <jdcruz@bakerlaw.com>

Co: Wesley Donohue <wesleydonohue@gmail.com>, Marisa Brand <marisa@laurensgrupp.com>

Hi Greg and Jason --

Attached you will find an update on where we are with pitching Parker's narrative to the press. The PI has been in the field tracking Buster and was able to confirm the vehicle Paul is driving. She has trackers on both of the vehicles and will use those to track their habits, and ultimately catch Paul acting belligerent.

The research team has begun expanding upon the existing research and organizing the existing research into a format we can use to start pitching aspects of our narrative. Contract is signed and I believe they've sent the initial invoice to Jason.

Let me know if you all would like to schedule a call with the PI. She will continue to upload surveillance and reports to our Murdaugh folder.

Thank you!
Christiana

Christiana Purves
Vice President
770-666-5103
Laurensgrupp.com

3.3.21 Parker's Update.pdf
00K

Wesley Donohue <wesleydonohue@gmail.com>

Wed, Mar 3, 2021 at 3:50 PM

To: Christiana Purves <christiana@laurensgrupp.com>

Co: Greg Parker <gparker@parkeradv.com>, Jason D'Cruz <jdcruz@bakerlaw.com>, Marisa Brand <marisa@laurensgrupp.com>

Did you tell the research team that I would cover the extra cost beyond what Jason wanted to pay?

[Quoted text hidden]
[Quoted text hidden]
Christiana Purves
Vice President
770-666-5103
Laurensgrupp.com

Wesley Donohue
CEO | Push Digital
www.pushdigital.com

o, wesley@pushdigital.com
o, 843.460.7800
i, twillor.com/wesleydonohue

https://mail.google.com/mail/u/0/?ik=a2e1e42234&view=pt&search=all&pe=mid=thread:16211693214257330191728&siml=msg-16211693214257330191728... 1/2

CONFIDENTIAL LAURENSGROUP_001074

CONFIDENTIAL

1128127, 3:27 PM

Small - 3.3.2) Parker's Update

f. facebook.com/wesleydonehew

本報記者採訪報導，未經本報許可，不得轉載。

Christellana Purvoss christellana@laurensgroup.com
 2014-2015 Laurens Group, Inc. All rights reserved. © 2015 Laurens Group, Inc.

To: Wesley Donohue <wwealeydonohue@gmail.com>

To: Wesley Donohill <wesleydonohill@gmail.com>
Cc: Greg Parker <gparker@parkerhav.com>, Jason D'Cruz <jdcruz@bakertlaw.com>, Marisa Brand
<marisa@laurensigroup.com>

Wed, Mar 3, 2021 at 3:58 PM

Yes, we paid the \$2,800.

On Mar 3, 2021, at 3:57 PM, Wesley Donohue <wesleydonohue@gmail.com> wrote:

[Quoted text hidden]

<https://mail.google.com/mail/u/0/?ikd261a4223d&visi=smp&read=ok&ui=permanid&read=fgGA1693X4425733043728&siml=msg-f783A169324425733043728...> 2/2

CONFIDENTIAL LAURENSGROUP_001076

Gmail - Net 1,29,21 Proker's Update

Wesley Donohue <wesleydonohue@gmail.com>

'1 messages

Thu, Feb 4, 2021 at 3:32 PM

Christiana Purves <christiana@laurengroup.com>
 To: Greg Parker <gparker@parkeraav.com>
 Co: Marisa Brand <marisa@laurengroup.com>, Jason D'Cruz <jdoruz@bakerluw.com>, Wesley Donehue
 <wesleydonehue@gmail.com>

Great! We will get moving on it.

> On Feb 4, 2021, at 2:21 PM, Greg Parker <gparker@parkersav.com> wrote:

3

✓ Yes we are, Total focus to get pictures of Paul Drinking

3

> Sent from my iPhone

3

>> On Feb 4, 2021, at 2:51 PM, Chirlianna Purves <chirlianna@lauranagroup.com> wrote:

2

>> Just wanted to touch base before the end of the week and see if you all are ready to move forward with the PI.

•

>> Let us know if you need anything from us.

3

>> Thanks!

>> Chirbilana

22

>>>> On Feb 2, 2021, at 1:49 PM, Christellana Purvis <christellana@laurensagroup.com> wrote:

2

>>> Jason — I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thankol

3

>>> <Paul Murdaugh Investigation Conknot.pdf>

:

:

>>>>> On Jan 20, 2021, at 10:42 AM, Christlana Purves <christlann@laurensgroup.com> wrote:

>>>> Good morning,

>>>> Attached you will find an update on where we are with the strategy we discussed to begin changing the narrative in support of Parler's. The two main themes we need in order to begin working with reporters are the research to develop a road map and citations for the press, and a private investigator to verify Paul Murdaugh's reckless behavior and discover additional information on the players in this case.

>>>> Let us know if you need anything else from us to lockdown the research firm and private investigator or if you'd like to discuss any of this further.

>>>> Thank you!

>>>> Christiana

>>>> <Parker's Undate 1_20_21.pdf>

> The information contained in this communication from the sender is
> confidential, it is intended solely for use by the recipient and others
> authorized to receive it. If you are not the recipient, you are hereby
> notified that any disclosure, copying, distribution or taking action in
> relation of the contents of this information is strictly prohibited and may
> be unlawful.

https://oai.gob.gob.mx/oai/2.0?verb=GetRecord&id=1690798152271408634&metadataPrefix=oai_dc&from=1690798152271408634 1/1

25

CONFIDENTIAL

Monday, April 4, 2022 at 12:22:56 Eastern Daylight Time

Subject: RE: Paul Murdaugh Investigation Contract
Date: Friday, February 5, 2021 at 2:22:33 PM Eastern Standard Time
From: D'Cruz, Jason <jdcruz@bakerlaw.com>
To: Christiana Purves <christiana@laurensgruop.com>
Cc: Sara C. <sara@inquiryagency.net>, Marisa Brand <marisa@laurensgruop.com>

BakerHostetler LLP

Thanks.

-----Original Message-----

From: Christiana Purves <christiana@laurensgruop.com>
Sent: Friday, February 5, 2021 2:14 PM
To: D'Cruz, Jason <jdcruz@bakerlaw.com>
Cc: Sara C. <sara@inquiryagency.net>; Marisa Brand <marisa@laurensgruop.com>
Subject: Re: Paul Murdaugh Investigation Contract

[External Email: Use caution when clicking on links or opening attachments.]

Hey Sara — I'm putting you on an email with Jason D'Cruz. Parker's would like for the contract to be between you and the law firm, Baker.

Jason — Do you mind providing the exact name you'd like to have on the contract?

Thank you, both!

> On Feb 2, 2021, at 1:49 PM, Christiann Purves <christiana@laurensgruop.com> wrote:
>
> Jason — I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thanks!
>
> <Paul Murdaugh Investigation Contract.pdf>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result

Page 39 of 59

CONFIDENTIAL LAURENSGROUP_001723

CONFIDENTIAL

Monday, April 4, 2022 at 12:22:56 Eastern Daylight Time

of e-mail transmission.

Subject: Re: Paul Murdaugh Investigation Contract
Date: Friday, February 5, 2021 at 2:14:19 PM Eastern Standard Time
From: Christiana Purves <christiana@laurensgroup.com>
To: Jason D'Cruz <jdcruz@bakerlaw.com>
CC: Sara C. <sara@inquiryagency.net>, Marisa Brand <marisa@laurensgroup.com>

Hey Sara -- I'm putting you on an email with Jason D'Cruz. Parker's would like for the contract to be between you and the law firm, Baker.

Jason -- Do you mind providing the exact name you'd like to have on the contract?

Thank you, both!

> On Feb 2, 2021, at 1:49 PM, Christiana Purves <christiana@laurensgroup.com> wrote:
>
> Jason -- I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thanks!
>
> <Paul Murdaugh Investigation Contract.pdf>

Page 40 of 55

CONFIDENTIAL LAURENSGROUP_001724

CONFIDENTIAL

Laurens Group

MEMORANDUM—South Carolina Project

To: Greg Parker

From: Wesley Donehue

Date: December 6, 2020

Overview

When faced with a multifaceted crisis that lay at the nexus of the law, politics, and media, I believe it is prudent to take strategic action in Parker's defense as it relates to the murder of Mallory Beach. Likewise, it is pragmatic to protect the future of the company's business in South Carolina and the great investment Parker's has already made in the state. The Laurens Group is prepared to develop and execute plans on two fronts—forming and solidifying a fact-based media narrative of the murder and its true perpetrators while also navigating the legislative initiatives that would prevent an inevitable insurance crisis for every seller of alcohol in the state. This document is meant to be a brief overview of the broader strategy segments that the Laurens Group would develop should it be retained by Parker's.

Telling the Whole Story

Considering the breadth and width of corruption, media manipulation, and blatant untruthfulness that has taken place thus far, the full story of Mallory Beach's murder must be told with more veracity and aggressive tact. The goal of telling the full story surrounding the Murdaugh family, their exploits, and their overt disdain for the rule of law is to dampen the family's influence among South Carolina officials who would then be hesitant to align themselves with such scandal, allowing for a more fair process to take its natural course. Additionally, and maybe more importantly, it places the blame on the murderer, Paul Murdaugh, and not Parker's in the minds and opinions of the public. I believe that the story must be told from third parties and not Parker's itself, insulating the company. Because so many aspects of the story contain elements of intrigue, I am confident that there will be significant interest on the part of media outlets to cover the story correctly.

The Laurens Group's work as it relates the above strategy may include, but is not limited to, the following:

- > Seeding media placements in prominent South Carolina publications and digital properties
- > Pitching national outlets on the "oldest ball" and scandalous aspects of the story for broadcast television and long-form print publications
- > Developing talking points for 3rd party verifiers who will be quoted by the press



CONFIDENTIAL LAURENSGROUP_001356

CONFIDENTIAL

Laurens Group

- Creating a media research packet in conjunction with research professionals for dissemination among investigative journalists
- Tracking and investigating the Murdaugh's current corruption and poor lifestyle choices
- Surveying statewide public opinion on the story in general and opinions of the Murdaugh's and Parker's for strategic use
- Logging all media mentions and social media verbatim for tactical insight

Stopping An Insurance Crisis

Unfortunately, the end result of this circumstance may never be justice for Mallory Beach but, instead, the closure of South Carolina businesses and loss of thousands of jobs due to skyrocketing liability insurance for those who sell alcohol in the state. Every industry impacted—bars, restaurants, liquor stores, groceries, hotels and convenience stores—should be rallied together to influence state officials to create an environment where the businesses can thrive rather than face the threat of collapse. Likewise, during a difficult year with COVID restrictions putting many of these exact businesses on the brink, rising insurance costs compound stress placed on South Carolina's hospitality industry. The Laurens Group proposes developing a legislative strategy in conjunction with a seasoned lobbyist that pressures South Carolina's public officials to act swiftly on what is an impending crisis.

The Laurens Group's work as it relates the above strategy may include, but is not limited to, the following:

- Developing an advocacy group to be the voice of this legislation and tell the stories of small business owners who are struggling and are now being additionally victimized by bad legislation and greedy trial lawyers
- Recruiting the coalition of members of the above group among industry leaders, business owners and advocates
- Creating the paid media strategy and advertising that will ultimately pressure South Carolina at large to contact their legislators in favor of this new legislation
- The seeding of 'Letters to the Editors' of statewide publications advocating on behalf of the legislation
- The recruitment of high profile federal, state and locally elected and formerly elected officials to endorse the advocacy group

Retaining the Laurens Group

Our goal is to win and we'll do everything within our ability to accomplish our client's goals. It is very likely that achieving the two goals above will require actions and strategies that have not yet been perceived. We're not in the business of nickel and



CONFIDENTIAL LAURENSGROUP_001357

CONFIDENTIAL

Laurens Group

diminishing our clients. We seek to have a long term relationship with every individual and organization with whom we work. We want raving fans who tell others about the quality and effectiveness of our talent. The Laurens Group is confident that we can develop and execute both goals laid out above.

Fees for these projects will be \$25,000 a month, for a period to be negotiated once knowledge of both the legal and legislative timelines are more clear. It is also likely that there will be additional costs once the plans are developed. As the plan is developed, we will make costs transparent and submit those for approval to Parker's before we execute upon them.

Finally, Parker's is the type of business with whom we want to be in the trenches. The pride you take in your work and what you've built is inspirational and worth defending. We would be honored to help you in any way we can.



CONFIDENTIAL LAURENSGROUP_001358

CONFIDENTIAL INFORMATION
TO BE SUBMITTED TO COURT
IN CONNECTION WITH THE
MOTION TO SEAL

From: Google Calendar on behalf of Craig Linder
To: Rhett D. Ricard
Subject: Accepted: Call RE Subpoena to Ms. Bauerlein @ Fri Oct 10, 2025 11:30am - 12pm (EDT) (Rhett D. Ricard)
Attachments: Invite.ics

Call RE Subpoena to Ms. Bauerlein

Craig Linder
has accepted this invitation.

Resending with new Teams path. Please use the link by phone.

Microsoft Teams Need help?
Join the meeting now
Meeting ID: 210 024 865 988
Passcode: mhM2Ug995

Dial in by phone
+1 469-213-3760, 512728900# United States, Puerto Rico
Find a local number
Phone conference ID: 512 728 900#
Join on a video conferencing device
Team link key: maynardnexsen@m.navy.mil <mailto:maynardnexsen@m.navy.mil>
Video ID: 116 230 635 2
More info
For organizers: Meeting options | Reset dial-in PIN
[https://cdn.cookielaw.org/logos/20b66d5d-9d75-48b2-a574-4722bb717316/3cd714e3-6596-45b9-b1f5-731e467d4d277b29d0f0-n608-485d-b8]-
o94de0985f2o/Logo.png <https://url.us.m.milincastprotect.com/vs/k3J8CnSYNN89W1QqBivvUWTWN-7domain=google.com>]
https://www.maynardnexsen.com/ <https://url.us.m.milincastprotect.com/vs/k3J8CnSYNN89W1QqBivvUWTWN-7domain=google.com>
Org help | Privacy and security

When

Friday Oct 10, 2025 • 11:30am – 12pm (Eastern Time - New York)

Location

Microsoft Teams Meeting
View map <https://url.us.m.milincastprotect.com/vs/YYPnVCYvM4URM3o5gsVWuzJox7domain=calendar.google.com>

Guests

Rhett D. Ricard <mailto:ricard@maynardnexsen.com>
- organizer
Craig Linder <mailto:craig.linder@dowjones.com>
- creator
Mark C. Moore <mailto:mmoore@maynardnexsen.com>
Jbannister@bannisterwyatt.com <mailto:jbannister@bannisterwyatt.com>
- optional
Dobornik Barber <mailto:dbb@dobornikbarber.com>
- optional
View all guest info <https://url.us.m.milincastprotect.com/vs/vi-JCkRnOO2wRn6uQlVuOm0137domain=calendar.google.com>
Invitation from Google Calendar <https://url.us.m.milincastprotect.com/vs/YYPnVCYvM4URM3o5gsVWuzJox7domain=calendar.google.com>

You are receiving this email because you are an attendee on the event.

Forwarding this invitation could allow any recipient to send a response to the organizer, be added to the guest list, invite others regardless of their own invitation status, or modify your RSVP. Learn more <https://url.us.m.milincastprotect.com/vs/pf88CmZ2MM8ym75KcQimR-7m1?domain=support.google.com>

CONFIDENTIAL

PARKERS_DEFENDANTS_000743

From: Google Calendar on behalf of Craig Linder
To: Rhett D. Ricard
Subject: Accepted: Call RE Subpoena to Ms. Bauerlein @ Fri Oct 10, 2025 11:30am - 12pm (EDT) (Rhett D. Ricard)
Attachments: Invitations

Call RE Subpoena to Ms. Bauerlein

Craig Linder
has accepted this invitation.

Did in by phone
+1 469-213-3760, 3421 14809th United States, Pritco
Find a local number

When

Friday Oct 10, 2025 • 11:30am – 12pm (Eastern Time - New York)

Guests

Rhett D. Ricard <mailto:rricard@maynardnussen.com>
- organizer
Craig Linder <mailto:craig.linder@doyjones.com>
- creator
Mark C. Moore <mailto:mcmoores@maynardnussen.com>
Jbannister@bannisterwyatt.com <mailto:jbannister@bannisterwyatt.com>
- optional
Deborah Barber <mailto:dbb@deborahbarber.com>
- optional
View all guest info <https://url.us.m.minecastprotect.com/s/1EoXC68mzzCLW9yOnpFusJfQv7domain=calendar.google.com>
Invitation from Google Calendar <https://url.us.m.minecastprotect.com/s/AVIKjC73nWVzQR6KpTWiDuoJyG2?domain=calendar.google.com/>

You are receiving this email because you are an attendee on the event.

Forwarding this invitation could allow any recipient to send a response to the organizer, be added to the guest list, invite others regardless of their own invitation status, or modify your RSVP. Learn more <https://url.us.m.minecastprotect.com/s/8x_C82oGBINKM0yU2iPay4yoB?domain=support.google.com>

From: Kutrow, Bradley R.
To: Rhett D. Ricard
Cc: Craig Under
Subject: Beach v. Parker 25CV031907-910 (Wake County)
Date: Friday, December 6, 2024 1:14:05 PM
Attachments: Jackson Subpoena Objection.pdf

Mr. Ricard –

This firm represents Valerie Bauerlein Jackson. I've attached her Objection to the subpoena served on her in Wake County.

Best regards,

Brad Kutrow

Bradley R. Kutrow
Partner
McGulreWoods LLP
201 N. Tryon St.
Suite 3000
Charlotte, NC 28202-2146
T: +1 704 343 2049
M: +1 704 201 6984
F: +1 704 444 8743
bkutrow@mcgulrewoods.com
Bio | VCard | www.mcgulrewoods.com



This e-mail from McGulreWoods may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading or forwarding to others.

McGuireWoods

McGuireWoods LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202-2140
Phone: 704.343.2000
Fax: 704.343.2300
www.mcguirewoods.com

Bradley R. Kulrow
Direct: 704.343.2040
bkulrow@mcguirewoods.com

December 5, 2025

BY EMAIL AND U.S. MAIL

Rhett Ricard
205 King Street, Suite 400
Charleston, SC 29401
RRicard@maynarddixsen.com

Re: Wake County Superior Court Subpoena to Valerie Jackson

Dear Mr. Ricard:

This firm represents Valerie Jackson, whose professional byline is Valerie Bauerlein, in connection with the referenced document subpoena issued under Rule 45 of the North Carolina Rules of Civil Procedure. This letter will serve as Ms. Jackson's objection to that subpoena under Rule 45(c), and supplements the previous objections and responses of Craig Linder, Associate General Counsel of Dow Jones & Company, Inc., Ms. Jackson's employer, in his previous communications with you.

First, to renew a point that Mr. Linder has made in his previous communications to you, any documents or information created or obtained by Ms. Jackson in connection with her work as reporter for *The Wall Street Journal* is the property of Dow Jones, its publisher. Dow Jones owns and controls such documents, so the subpoena to Ms. Jackson is misdirected. As Mr. Linder indicated, Dow Jones is willing to accept service of a subpoena duly issued to Dow Jones by a New York court.

Second, even if such documents were owned and controlled by Ms. Jackson, they would be subject to the protections of North Carolina's Shield Law, N.C. Gen. Stat. § 8-53.11, and the parallel protections afforded to journalists by the First Amendment. *See, e.g., Pengosh v. Jacobs Engineering Group, Inc.*, 2020 WL 5709256 (E.D.N.C. March 24, 2020). The Shield Law provides a qualified privilege against disclosure in any legal proceeding for confidential or nonconfidential information and documents obtained or prepared by journalists. Essentially all the documents within the descriptions in the numbered requests served with your subpoena are subject to this qualified privilege. The privilege cannot be overcome without a greater weight-of-the-evidence showing that the document at issue is "relevant and material to the proper administration of the legal proceeding" for which it is sought; that it cannot be obtained from any alternative sources; and that it is essential to maintenance of a claim or defense asserted by the person on whose behalf the document is sought. The subpoena does not articulate any basis on which this statutory privilege could be overcome. There appear to be many other sources for the documents and information purportedly sought by the subpoena, including the parties and their attorneys.

Third, and in addition to these critical threshold objections, the requests in the subpoena are extremely broad and would impose undue burden and expense on Ms. Jackson (or Dow Jones). Requests demanding "all documents" or "any and all communications," without sufficient specificity, impose undue expense on Ms. Jackson as a non-party. Under Rule 45(c)(1), the party and counsel issuing a non-party subpoena has an affirmative duty to avoid imposing unreasonable burden and expense. Here, that duty is heightened further by the statutory and First Amendment protections accorded to Ms. Jackson.

Atlanta | Austin | Baltimore | Charlotte | Charlottesville | Chicago | Dallas | Houston | Jacksonville | London | Los Angeles - Century City
Los Angeles - Downtown | New York | Norfolk | Pittsburgh | Raleigh | Richmond | San Francisco | Tysons | Washington, D.C.

CONFIDENTIAL

PARKERS_DEFENDANTS_000746

January 1, 1988
Page 2

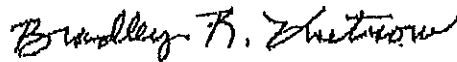
Fourth, and to ensure that all objections to the subpoena are set forth, Ms. Jackson objects to the numbered "Subpoena Requests" as follows:

- Request 1 seeks "published articles" which, by definition, are available from alternative public sources.
- Request 2 seeks unpublished drafts of articles, which are protected by § 8-53.11 and case law extending First Amendment protection to drafts, outtakes, and the editorial process.
- Request 3 similarly seeks internal editorial communications within a newsgathering organization that are similarly protected from disclosure by § 8-53.11(b).
- Requests 4, 5, and 6 likewise seek documents and information "obtained and prepared while acting as a journalist" that are specifically protected from disclosure by § 8-53.11(b).
- Request 7 seeks documents relating to corrections, clarifications or retractions "considered or issued" after publication of news articles. No such documents exist because no corrections, clarifications, or retractions were considered or issued.
- Requests 8 and 9 seek "any and all communications" between Ms. Jackson and the parties to the underlying *Beach v. Parker* cases, their counsel, or associates of their counsel. Any such communications are plainly obtainable from the parties and their counsel, so these requests violate § 8-53.11(c).

Finally, to address another topic that you and Mr. Linder communicated about, we understand that the Plaintiffs in the *Beach v. Parker* Case No. 2021-CP-25-00392 had listed Ms. Jackson as a person with "knowledge" about the facts events, claims, and defenses "surrounding" that lawsuit. Whatever knowledge and information Ms. Jackson may have acquired in the course of her newsgathering work and is therefore within the protection provided by § 8-53.11. Accordingly, we have no reason to believe Ms. Jackson would be a witness in that or any case.

If it would be helpful to discuss this matter further, I am glad to do so. To be clear, however, Ms. Jackson will fully assert her statutory and constitutional protections as a journalist.

Very truly yours,



Bradley R. Kutrow

Co: Craig Linder, Dow Jones & Co.

CONFIDENTIAL

PARKERS_DEFENDANTS_000747

From: Craig Linder
To: Rhett D. Ricard
Cc: Mark C. Moore; dbb@deborahbarbler.com; James W. Bannister (JBannister@bannisterwyatt.com)
Subject: Re: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.) (JMAN-NPD DOCUMENTS, FID17518047)
Date: Thursday, October 9, 2025 3:50:56 PM
Attachments: image001.jpg

Same here. Could you send a dial-in or another link?

Craig Linder | Vice President & Associate General Counsel

Dow Jones & Company

craig.linder@dowjones.com

On Thu, Oct 9, 2025 at 3:39 PM Rhett D. Ricard <RRRicard@maynardnexsen.com> wrote:

11:30 AM tomorrow works for me.

Respectfully,

Rhett D. Ricard
Shareholder | Complex Litigation
P: (843) 720-1707
RRRicard@maynardnexsen.com

205 King Street Suite 400
Charleston, South Carolina 29401



From: Mark C. Moore <MMoore@maynardnexsen.com>
Sent: Thursday, October 9, 2025 3:37 PM
To: Craig Linder <craig.linder@dowjones.com>
Cc: Rhett D. Ricard <RRRicard@maynardnexsen.com>; dbb@deborahbarbler.com; James W. Bannister (JBannister@bannisterwyatt.com) <JBannister@bannisterwyatt.com>
Subject: RE: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.) [JMAN-

CONFIDENTIAL

PARKERS_DEFENDANTS_000748

NPDOCUMENTS.FID17518047]

Mr. Linder:

I can do a call in that window. Would 11:30 work for everyone?

Mark C. Moore
Shareholder | Criminal Defense & Investigations | Litigation | Compliance
P: (803) 540-2148
MMoore@maynardnexasen.com

1230 Main Street
Suite 700
Columbia, South Carolina 29201



From: Craig Linder <craig.linder@dowjones.com>
Sent: Thursday, October 9, 2025 3:30 PM
To: Mark C. Moore <MMoore@maynardnexasen.com>
Cc: Rhett D. Ricard <RRicard@maynardnexasen.com>; ddb@deborahbarbler.com; James W. Bannister (JBannister@bannisterwyatt.com) <JBannister@bannisterwyatt.com>
Subject: Re: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.) (IMAN-NPDOCUMENTS.FID17518047)

Thank you for your email, Mr. Moore. I'd be happy to discuss tomorrow. I am free between 11 a.m. and 1 p.m. ET. Would you or your colleagues have availability in that window?

Thanks,

Craig

CONFIDENTIAL

PARKERS_DEFENDANTS_000749

Craig Linder | Vice President & Associate General Counsel

Dow Jones & Company

craig.linder@dowjones.com

On Wed, Oct 8, 2025 at 11:47 AM Mark C. Moore <MMoore@maynardnexusen.com> wrote:

Mr. Linder:

Thank you for your email. Can we set up a call tomorrow or Friday to discuss? As you can see, I am copying my co-counsel on this email.

Best,

Mark

Mark C. Moore
Shareholder | Criminal Defense & Investigations | Litigation | Compliance
P: (803) 640-2146
MMoore@maynardnexusen.com

1230 Main Street
Suite 700
Columbia, South Carolina 29201



From: Craig Linder <craig.linder@dowjones.com>
Sent: Tuesday, October 7, 2025 5:10 PM
To: Mark C. Moore <MMoore@maynardnexusen.com>

CONFIDENTIAL

PARKERS_DEFENDANTS_000750

Subject: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.)

Dear Mr. Moore --

I am counsel to Dow Jones & Company, the publisher of *The Wall Street Journal*. I understand that you have issued subpoenas that would purport to require Dow Jones employee Valerie Bauerlein to produce a number of records and other materials that you believe to be relevant in the case of *Beach et al. v. Parker et al.*, Case 25CV034907-910, now pending in South Carolina Circuit Court.

The materials that you appear to be seeking would not be the property of Ms. Bauerlein. Instead, any materials that Ms. Bauerlein may have created or have access to in the course of her work as a Dow Jones employee would be owned and controlled by Dow Jones at our corporate offices in New York.

To avoid needless legal expenses for all parties, I would suggest that you withdraw any subpoena directed to Ms. Bauerlein and, if you remain interested in any materials controlled by Dow Jones, instead issue a subpoena to Dow Jones properly domesticated in New York.

If you'd like, I'd be happy to review any domesticated New York subpoena and discuss our willingness to accept service of such a subpoena in New York in order to potentially save the expense and burden of service costs. And, of course, I am otherwise happy to discuss with you any aspect of this matter.

This is not a complete statement of Dow Jones's rights, all of which are reserved.

Best,

Craig Linder

Craig Linder | Vice President & Associate General Counsel

CONFIDENTIAL

PARKERS_DEFENDANTS_000751

Dow Jones & Company

craig.linder@dowjones.com

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.

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.

CONFIDENTIAL

PARKERS_DEFENDANTS_000752

From: Craig Linder
To: Rhett D. Ricard
Cc: dhh@dchoraharbiter.com; James W. Bannister (JBannister@bannisterwyatt.com); Mark C. Moore
Subject: Re: Subpoena to Valerie Bauerlein (Beach) et al. v. Parker et al. (JMAN-NPDOCUMENTS.FID17518047)
Date: Monday, December 1, 2025 1:40:55 PM
Attachments: image001.jpg

Dear Rhett --

Thanks for your kind words about Thanksgiving -- I hope you and your family had a nice holiday as well. That said, I am surprised by your email: My recollection of our October 10 conversation is that you had indicated that you would provide a copy of what you had described as an interrogatory response in which the plaintiffs in your case had indicated that Ms. Bauerlein would be testifying on their behalf, and we had tentatively agreed to speak again after you had provided that information. Unless I have missed something (and apologies if I have), until today's email I had heard nothing more on this matter. Ms. Bauerlein remains uncertain as to why the plaintiffs in this case would believe her to be testifying, as she, like all WSJ reporters, does not voluntarily become engaged in litigation, and she is unsure of any basis the plaintiffs could have for such an assertion. That's particularly true because, as your email notes, Ms. Bauerlein does not personally control any documents that she may have created or obtained in the course of her work as an employee of Dow Jones. I'd be happy to discuss further.

Thanks,
Craig

Craig Linder
VP & ASSOCIATE GENERAL COUNSEL



E: craig.linder@dowjones.com

On Mon, Dec 1, 2025 at 12:13 PM Rhett D. Ricard <RRRicard@mynardnexsen.com> wrote:

Craig,

We hope you had a happy Thanksgiving. We wanted to provide you notice that Ms. Bauerlein has failed to provide any documents in response to our subpoena in accordance with the deadline set forth in our subpoena to her. We understand from our phone call with you that your company asserts possession of responsive documents; however, we still believe Ms. Bauerlein possesses some documents in her individual capacity, which she has not produced. She should produce those documents that she possesses in her individual capacity within five (5) business days; otherwise, we intend to seek judicial relief. If you are aware of whether she has hired personal counsel, please let us know and we can direct this correspondence to her personal counsel.

CONFIDENTIAL

PARKERS_DEFENDANTS_000753

Please let us know if you have any questions or concerns.

Respectfully,

Rhett D. Ricard
Shareholder | Complex Litigation | Labor & Employment
P: (843) 720-1707
RRRicard@maynardnexusen.com

205 King Street Suite 400
Charleston, South Carolina 29401



From: Craig Linder <craig.linder@dowjones.com>
Sent: Thursday, October 9, 2025 3:30 PM
To: Mark C. Moore <MMoore@maynardnexusen.com>
Cc: Rhett D. Ricard <RRRicard@maynardnexusen.com>; dbb@deborahbarbier.com; James W. Bannister (JBannister@bannisterwyatt.com) <JBannister@bannisterwyatt.com>
Subject: Re: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.) [IMAN-NPDOCUMENTS.FID17518047]

Thank you for your email, Mr. Moore. I'd be happy to discuss tomorrow. I am free between 11 a.m. and 1 p.m. ET. Would you or your colleagues have availability in that window?

Thanks,

Craig

Craig Linder | Vice President & Associate General Counsel
Dow Jones & Company

CONFIDENTIAL

PARKERS_DEFENDANTS_000754

craig.linder@dowjones.com

On Wed, Oct 8, 2025 at 11:47 AM Mark C. Moore <MMoore@maynardnexusen.com> wrote:

Mr. Linder:

Thank you for your email. Can we set up a call tomorrow or Friday to discuss? As you can see, I am copying my co-counsel on this email.

Best,

Mark

Mark C. Moore
Shareholder | Criminal Defense & Investigations | Litigation | Compliance
P: (803) 540-2146
MMoore@maynardnexusen.com

1230 Main Street
Suite 700
Columbia, South Carolina 29201



From: Craig Linder <craig.linder@dowjones.com>
Sent: Tuesday, October 7, 2025 5:10 PM
To: Mark C. Moore <MMoore@maynardnexusen.com>
Subject: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.)

Dear Mr. Moore --

CONFIDENTIAL

PARKERS_DEFENDANTS_000755

I am counsel to Dow Jones & Company, the publisher of *The Wall Street Journal*. I understand that you have issued subpoenas that would purport to require Dow Jones employee Valerie Bauerlein to produce a number of records and other materials that you believe to be relevant in the case of *Beach et al. v. Parker et al.*, Case 25CV034907-910, now pending in South Carolina Circuit Court.

The materials that you appear to be seeking would not be the property of Ms. Bauerlein. Instead, any materials that Ms. Bauerlein may have created or have access to in the course of her work as a Dow Jones employee would be owned and controlled by Dow Jones at our corporate offices in New York.

To avoid needless legal expenses for all parties, I would suggest that you withdraw any subpoena directed to Ms. Bauerlein and, if you remain interested in any materials controlled by Dow Jones, instead issue a subpoena to Dow Jones properly domesticated in New York.

If you'd like, I'd be happy to review any domesticated New York subpoena and discuss our willingness to accept service of such a subpoena in New York in order to potentially save the expense and burden of service costs. And, of course, I am otherwise happy to discuss with you any aspect of this matter.

This is not a complete statement of Dow Jones's rights, all of which are reserved.

Best,

Craig Linder

Craig Linder | Vice President & Associate General Counsel

Dow Jones & Company

craig.linder@dowjones.com

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.

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.

From: Rhett D. Ricard
To: Craig Linder
Cc: dbb@deborahbarbler.com; James W. Bannister (JBannister@bannisterwyatt.com); Mark C. Moore
Dcc: The Parker Companies_062033_00013_Conspiracy Lawsuit E_Mails
Subject: RE: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.) [IMAN-NPDOCUMENTS.FID17518047]
Date: Monday, December 1, 2025 4:17:10 PM
Attachments: 2025.07.22 - Pls Answers to Parker INT.pdf
Image001.jpg

Craig,

Please see page 2 of the attached. Whether she does or does not have responsive documents, she or her counsel should respond to us within the next five (5) business days.

Respectfully,

Rhett D. Ricard
Shareholder | Complex Litigation | Labor & Employment
P: (843) 720-1707
RRRicard@maynardnexsen.com

205 King Street Suite 400
Charleston, South Carolina 29401



From: Craig Linder <craig.linder@dowjones.com>
Sent: Monday, December 1, 2025 1:40 PM
To: Rhett D. Ricard <RRRicard@maynardnexsen.com>
Cc: dbb@deborahbarbler.com; James W. Bannister (JBannister@bannisterwyatt.com)
<JBannister@bannisterwyatt.com>; Mark C. Moore <MMoore@maynardnexsen.com>
Subject: Re: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.) [IMAN-NPDOCUMENTS.FID17518047]

Dear Rhett --

Thanks for your kind words about Thanksgiving -- I hope you and your family had a nice holiday as well. That said, I am surprised by your email; My recollection of our October 10 conversation is that you had indicated that you would provide a copy of what you had described as an interrogatory response in which the plaintiffs in your case had indicated that Ms. Bauerlein would be testifying on their behalf, and we had tentatively agreed to speak again after you had provided that information. Unless I have missed something (and apologies if I have), until today's email I had heard nothing more on this matter. Ms. Bauerlein remains uncertain as to why the plaintiffs in this case would believe her to be testifying, as she, like all WSJ reporters, does not

CONFIDENTIAL

PARKERS_DEFENDANTS_000758

voluntarily become engaged in litigation, and she is unsure of any basis the plaintiffs could have for such an assertion. That's particularly true because, as your email notes, Ms. Bauerlein does not personally control any documents that she may have created or obtained in the course of her work as an employee of Dow Jones. I'd be happy to discuss further.

Thanks,
Craig

Craig Linder
VP & ASSOCIATE GENERAL COUNSEL

Dow Jones



E: craig.linder@dowjones.com

On Mon, Dec 1, 2025 at 12:13 PM Rhett D. Ricard <RRicard@maynardhesssen.com> wrote:

Craig,

We hope you had a happy Thanksgiving. We wanted to provide you notice that Ms. Bauerlein has failed to provide any documents in response to our subpoena in accordance with the deadline set forth in our subpoena to her. We understand from our phone call with you that your company asserts possession of responsive documents; however, we still believe Ms. Bauerlein possesses some documents in her individual capacity, which she has not produced. She should produce those documents that she possesses in her individual capacity within five (5) business days; otherwise, we intend to seek judicial relief. If you are aware of whether she has hired personal counsel, please let us know and we can direct this correspondence to her personal counsel.

Please let us know if you have any questions or concerns.

Respectfully,

Rhett D. Ricard
Shareholder | Complex Litigation | Labor & Employment
P: (843) 720-1707
RRicard@maynardhesssen.com

205 King Street Suite 400
Charleston, South Carolina 29401

CONFIDENTIAL

PARKERS_DEFENDANTS_000759



From: Craig Linder <craig.linder@dowjones.com>
Sent: Thursday, October 9, 2025 3:30 PM
To: Mark C. Moore <MMoore@maynardnexsen.com>
Cc: Rhett D. Ricard <RRicard@maynardnexsen.com>; djb@deborahharbier.com; James W. Bannister (JBannister@bannisterwyatt.com) <JBannister@bannisterwyatt.com>
Subject: Re: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.) (IMAN-NPDOCUMENTS.FID17518047)

Thank you for your email, Mr. Moore. I'd be happy to discuss tomorrow. I am free between 11 a.m. and 1 p.m. ET. Would you or your colleagues have availability in that window?

Thanks,
Craig

Craig Linder | Vice President & Associate General Counsel
Dow Jones & Company
craig.linder@dowjones.com

On Wed, Oct 8, 2025 at 11:47 AM Mark C. Moore <MMoore@maynardnexsen.com> wrote:

Mr. Linder:

Thank you for your email. Can we set up a call tomorrow or Friday to discuss? As you can see, I am copying my co-counsel on this email.

Best,

Mark
Mark C. Moore
Shareholder | Criminal Defense & Investigations | Litigation | Compliance
P: (803) 540-2146
MMoore@maynardnexsen.com

1230 Main Street
Suite 700
Columbia, South Carolina 29201

CONFIDENTIAL

PARKERS_DEFENDANTS_000760



From: Craig Linder <craig.linder@dowjones.com>
Sent: Tuesday, October 7, 2025 5:10 PM
To: Mark C. Moore <MMoore@maynardnexsen.com>
Subject: Subpoena to Valerie Bauerlein (Beach et al. v. Parker et al.)

Dear Mr. Moore --

I am counsel to Dow Jones & Company, the publisher of *The Wall Street Journal*. I understand that you have issued subpoenas that would purport to require Dow Jones employee Valerie Bauerlein to produce a number of records and other materials that you believe to be relevant in the case of *Beach et al. v. Parker et al.*, Case 25CV034907-910, now pending in South Carolina Circuit Court.

The materials that you appear to be seeking would not be the property of Ms. Bauerlein. Instead, any materials that Ms. Bauerlein may have created or have access to in the course of her work as a Dow Jones employee would be owned and controlled by Dow Jones at our corporate offices in New York.

To avoid needless legal expenses for all parties, I would suggest that you withdraw any subpoena directed to Ms. Bauerlein and, if you remain interested in any materials controlled by Dow Jones, instead issue a subpoena to Dow Jones properly domesticated in New York.

If you'd like, I'd be happy to review any domesticated New York subpoena and discuss our willingness to accept service of such a subpoena in New York in order to potentially save the expense and burden of service costs. And, of course, I am otherwise happy to discuss with you any aspect of this matter.

This is not a complete statement of Dow Jones's rights, all of which are reserved.

Best,
Craig Linder

Craig Linder | Vice President & Associate General Counsel
Dow Jones & Company
craig.linder@dowjones.com

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,

CONFIDENTIAL

PARKERS_DEFENDANTS_000761

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.

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.

STATE OF SOUTH CAROLINA
COUNTY OF HAMPTON

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT

Case 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.

PLAINTIFF'S ANSWERS TO
DEFENDANT GREGORY M.
PARKER, INC. D/B/A PARKER'S
CORPORATION'S FIRST SET OF
INTERROGATORIES

TO: MARK C. MOORE, ESQUIRE, SUSAN P. MCWILLIAMS, ESQUIRE,
DEBORAH B. BARBIER, ESQUIRE, MARKLEY DENNIS, JR., ESQUIRE, AND
RHETT D. RICARD, ESQUIRE, ATTORNEYS FOR GREGORY M. PARKER,
INC. D/B/A PARKER'S CORPORATION

STANDARD INTERROGATORIES

1. Give the full names, correct addresses, and telephone numbers of persons known to you to have knowledge concerning the facts, events, claims, or defenses surrounding this lawsuit, and indicate whether written or recorded statements (including affidavits) have been taken from the witnesses and, if so, indicate who has possession of such statements. If no statements have been taken, set forth a specific summary sufficient to inform the parties of the important facts known to or observed by the witnesses.

ANSWER: a) Stevon Peterson
c/o Andy Savage, Esq.
Savage Law Firm
15 Prioleau Street
Charleston, SC 29401

Mr. Peterson is a private investigator who was hired by Andy Savage, Esq. to investigate the death of Stephen Smith. In the course of his investigation, Mr. Peterson spoke with Sara Capelli and Vicky Ward. Audio recordings of those phone calls are attached hereto.

- b) Sara Capelli, Private Investigator
1330 Song Sparrow Road
Hanahan, SC 29410

Ms. Capelli is a private investigator who was hired on behalf of Greg Parker to investigate Paul Murdaugh and to document his behavior. In the course of her investigation, Ms. Capelli purchased alcohol for minors multiple times in an attempt to obtain information from the minors. Ms. Capelli exchanged text messages with the undersigned that are attached hereto. Further, recordings of phone calls between Ms. Capelli and Steven Peterson are also attached.

- c) Valerie Bauerlein, Journalist
1211 Avenue of the Americas
New York, NY 10036

Mrs. Bauerlein is an investigative journalist, writer, and author who published an article in the Wall Street Journal on August 13, 2022, and attached hereto, titled "A Convenience- Store Magnate, Teen Drinking and a Fatal Boat Crash: The Legal Case Shaking South Carolina." Upon information and belief, Mrs. Bauerlein interviewed a number of people while writing the story, including Mark Moore, Esq. and Deborah Barbier, Esq., who represent Greg Parker. Further, upon information and belief, Ms. Barbier told Mrs. Bauerlein that Gregg Roman, Max Fratoddi, and Henry Rosado were hired to work on behalf of Greg Parker.

- d) Vicky Ward
c/o Fenno Law Firm, LLC
P.O. Box 20220
Charleston, SC 29413

Ms. Ward is an investigative journalist, writer, and author. She was initially a defendant in this case but has since settled with the Plaintiffs. Please see her attached affidavit and exhibits, along with the phone calls referenced above. In the making of a documentary on the

Murdaugh family, Ms. Ward produced and released a trailer on or about November 24, 2021 titled "Murdaugh Murders: Deadly Dynasty." The trailer included six scenes from Plaintiffs confidential mediation video in the wrongful death case and photographs of Mallory Beach's body that have not been released publicly. She was provided the mediation video and photograph's of Mallory's body by Gregg Roman.

- e) Gregg Roman, Director of the Middle East Forum
1650 Market Street, Suite 3600
Philadelphia, PA 19103

Gregg Roman is a journalist and director of the Middle East Forum. He published an article on his website (greggroman.us) on July 27, 2021 titled "Death and Justice: The Murdaugh Family Murders." Mr. Roman worked for or on behalf of Greg Parker. In the course of his work, he was provided Plaintiffs confidential mediation video in the wrongful death case and unreleased photographs of Mallory Beach's body. Please see Affidavit of Vicky Ward and exhibit attached thereto. Mr. Roman and Ms. Ward co-produced a three episode documentary titled "Murdaugh Murders: Deadly Dynasty" that aired on the Discovery ID channel and is available to stream on Discovery+. The documentary includes video of Paul Murdaugh that was obtained by Sara Capelli, previously unreleased Snapchat videos of the boat occupants, and previously unreleased photographs of Mallory Beach's body.

- f) Mohamed Fahmy
(address unknown at this time)

Mr. Fahmy is a self-purported investigative journalist who is the former editor-in-chief of The Investigative Journal, which, upon information and belief, is a propaganda machine and has been sued for the same. Upon information and belief, Mr. Fahmy worked with Gregg Roman, and on Greg Parker's behalf, in publishing Mr. Roman's blog article that was released July 27, 2021 and other nefarious activities, including the smear campaign that Mr. Parker attempted to launch in the Spring of 2021.

- g) Jennifer Acree
Vaux Marscher Berglund, PA
1251 May River Road
Bluffton, SC 29910

Jennifer Acree is the office manager at Vaux Marscher Berglund, PA. Mr. Fratoddi spoke to Ms. Acree about renting office space at Vaux Marscher Berglund for himself and his partner, Henry Rosado.

- h) Eleanor McManus
1120 20th St. NW, Suite 700
North Washington, DC 20036

Ms. McManus is a public relations specialist hired by, or on behalf of, Greg Parker. She will testify about her involvement in the Parker campaign and Mark Moore's response once he was informed about the contents of the Wall Street Journal article.

- i) Deborah Barbier, Esq.
1811 Pickens Street
Columbia, SC 29201

Mrs. Barbier will testify that Gregg Roman, Max Fratoddi, and Henry Rosado were hired by an investigative firm that was hired on Greg Parker's behalf to dig into the Murdaugh family.

- j) Mark Moore, Esq.
1230 Main Street, Suite 700
Columbia, SC 29201

Mr. Moore will testify that Gregg Roman, Max Fratoddi, and Henry Rosado were hired by an investigative firm that was hired on Greg Parker's behalf to dig into the Murdaugh family. Further, Mr. Moore will testify about his efforts to harass the Beach family and the false statements he has made publicly.

- k) Steve LeBlanc, Esq.
416 E North Street
Greenville, SC 29601

Mr. LeBlanc is an attorney who copyrighted the confidential mediation video.

- l) Max Fratoddi
Private Investigations Services Group, LLC
c/o Andrew Radeker
Harrison, Radeker & Smith, P.A.
PO Box 50143
Columbia, SC 29250

Mr. Fratoddi is a private investigator who was hired on behalf of Greg Parker. No known written or recorded statements. Please see responses above and below.

- m) Henry Rosado
Private Investigations Services Group, LLC
c/o Andrew Radeker
Harrison, Radeker & Smith, P.A.
PO Box 50143
Columbia, SC 29250

Mr. Rosado is a private investigator who was hired on behalf of Greg Parker. No known written or recorded statements. Please see responses above and below.

- n) Wesley Donehue
o) Christina Purves
p) Jane Cahane

Ms. Cahane will testify about her experience with Mohammad Fahmy, Gregg Roman, and The Investigative Journal.

- q) A representative of the Beaufort County Sheriff's Office

A representative of the Beaufort County Sheriff's Office will testify as to the photographs of Mallory Beach's body that their investigators took and that those photographs were released to Parker's counsel, Mitch Griffith, Esq., but have never been released publicly.

- r) Sara Capelli

Ms. Capelli will testify about the investigation she performed on behalf of Parkers and their representatives.

- s) Sandy Sem, Esq.
- t) David Leggett, Esq.
Assistant Attorney General

Mr. Leggett will testify consistent with his affidavit dated December 13, 2021.

- u) Liz Farroll
- v) A representative of Warner Brothers

A representative of Warner Brothers will testify to material releases for material used in the trailer produced by Vicky Ward and in the Discovery+ documentary Murdaugh Murders: Deadly Dynasty.

- w) A representative of Blackfin Productions
- x) A representative of Blackfin Productions will testify to material releases for material used in the trailer produced by Vicky Ward and in the Discovery+ documentary Murdaugh Murders: Deadly Dynasty.
- y) Plaintiffs named above.
- z) Any witness named by any other party in this matter.
- aa) Plaintiffs reserve the right to supplement this answer as the case progresses.

2. Set forth a list of photographs, plats, sketches, or other prepared documents in your possession that relate to the claims or defenses in the case.

- ANSWER:
- a) Transcript of an interview between Craig Melvin and Greg Parker
 - b) Trailer for Murdaugh Family Murders: Deadly Dynasty
 - c) 2022.8.13 WSJ- A Convenience-Store Magnate, Teen Drinking and a Fatal Boat Crash_The Legal Case Shaking South Carolina
 - d) Affidavit of Michael Virzi
 - e) Affidavit of Vicky Ward with Exhibits A and C (Mallory Beach's body redacted)

CONFIDENTIAL

Witness Deposition	Tinsley	Vaux	Griffith	Dean	Tillar	Bower
TOTALS	123 pages 78 objections		520 pages 178 objections	135 pages	11 pages 2 objections	11 pages 12 objections
Morgan Doughty (B)	Present 20 objections	Present		145 pages		4 pages 5 objections
Miley Altman (B)	2 pages 12 objections	Present	122 pages			6 pages 1 objection
Counor Cook (B)	Present 12 objections	Present	134 pages			Present 4 objections
Buster Murdaugh	5 pages 5 objections		80 pages	Present	Present 2 objections	Present
Aaron Jambriska (O)	39 pages	Present	47 pages	Present		Present
Ken Labadie (P)	25 pages		Present	Present		Present
Kevin Long (P)	69 pages	Present	Present 8 objections	Present		Present
Mark Mercier (O)	15 pages		5 pages	Present		1 page
Sarah Bragg (P)	62 pages	Present	Present 4 objections	Present		Present
Shano Patterson (W)	3 pages 14 objections	Present	40 pages	Present	Present	
Shayna Gadson (P)	39 pages 4 objections	Present	18 pages 2 objections	Present		Present
Steven Domino (O)	11 pages 1 objection	Present	47 pages	Present		Present 2 objections
Tajeshia Cohen (P)	92 pages 10 objections	Present	25 pages 24 objections	Present		Present
Jeff Bush (P)	41 pages	Present	2 pages 4 objections	Present		Present
Blake Greco (P)	20 pages	Present	Present 5 objections	Present		Present

CONFIDENTIAL

1/28/22, 3:06 PM

Gmail - 4.9.21 Parker's Strategy Memo



Wesley Donehue <wesleydonehue@gmail.com>

4.9.21 Parker's Strategy Memo

2 messages

Fri, Apr 9, 2021 at 4:01 PM

Christiana Purves <christiana@laurensgruop.com>

To: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>

Cc: Wesley Donehue <wesleydonehue@gmail.com>, Marisa Brand <marisa@laurensgruop.com>, Lynn Stokes-Murray <lstokes-murray@burr.com>, SBruning@burr.com

Good afternoon,

Attached is a strategy memo detailing our plan to utilize traditional press, coalitions and legislative avenues to benefit Parker's.

Let us know if there are any questions/concerns and if you'd like to find time to discuss.

Hope everyone has a great weekend.

Thanks,
Christiana

@Christiana Purves
Vice President
770-656-5103
Laurensgruop.com

4.9.21 Parker's Strategy Memo.pdf
106K

Mon, Apr 12, 2021 at 1:55 PM

Christiana Purves <christiana@laurensgruop.com>

To: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>

Cc: Wesley Donehue <wesleydonehue@gmail.com>, Marisa Brand <marisa@laurensgruop.com>, Lynn Stokes-Murray <lstokes-murray@burr.com>, sbruning@burr.com

Just wanted to circle back and see if there were any thoughts on this. We'll be sending around a calendar invite for our weekly calls on Tuesday shortly.

> On Apr 9, 2021, at 4:01 PM, Christiana Purves <christiana@laurensgruop.com> wrote:

>

> Good afternoon,

[Quoted text hidden]

> <4.9.21 Parker's Strategy Memo.pdf>

>

>

> @Christiana Purves

> Vice President

> 770-656-5103

> Laurensgruop.com

>

<https://mail.google.com/mail/u/0/?ik=d2e1e42234&view=pt&search=all&permthid=thread-f%3A1696594374955962148&siml=msg-f%3A1696594374955962148...> 1/1

CONFIDENTIAL LAURENSGROUP_001081

CONFIDENTIAL

1/28/22, 3:38 PM

Gmail - Daily Laurens Group Update—February 2, 2021



Wesley Donehue <wesleydonehue@gmail.com>

Daily Laurens Group Update—February 2, 2021

1 message

Marisa Brand <marisa@laurensgroup.com>

Tue, Feb 2, 2021 at 4:48 PM

To: Wesley Donehue <wesleydonehue@gmail.com>, Christlana Purves <christlana@laurensgroup.com>, Tim Kelly <tim@pushdigital.com>

Action Items

- Set up calls with investment firms for Wes—Christlana/ Marisa
- Finalizing pitch deck for investment groups — Christlana/Marisa
- Develop Wes' media/press plan—Christlana/ Marisa/Tim
- Start developing pitch for NRA—Christlana
- Continue BizDev research—Marisa/ Tim/Intern
- Finalize SmallBiz Op-Ed—Wes/ Marisa

Other Things in the Works

- Parker's approval for research and PI—We've sent over the updated PI contract. Jason has not sent the engagement letter to Georgetown Group. We've requested to see that research as well. Jason is waiting on Greg to sign off on the research before sending.
- Reviewing LG ad budget
- Podcast logistics

Completed Items

- Sent pitch to Northeast Processing
- South Carolina hedge fund research
- Research group and PI for Parker's

Marisa Brand
Director of Laurens Group
714-363-7388

Laurens Group

**PUSH
DIGITAL**

<https://mail.google.com/mail/u/0/?ik=d2e1a42234&view=pt&search=all&spanid=thread-f93A1690621728048837623&siml=msg-f93A1690621728048837623> 1/1

CONFIDENTIAL LAURENSGROUP_001108

CONFIDENTIAL

Subject: Re: 3.12.21 Parker's Update
Date: Saturday, March 20, 2021 at 5:43:47 PM Eastern Daylight Time
From: Christiana Purves <christiana@laurensigroup.com>
To: Jason D'Cruz <jdcruz@bakerlaw.com>
CC: Marisa Brand <marisa@laurensigroup.com>

The research group has everything put together and is ready to release the book to us, but needs half of the invoiced paid before they do that. Have you all sent the \$12,500 yet?

> On Mar 12, 2021, at 4:02 PM, Christiana Purves <christiana@laurensigroup.com> wrote:
>
> Hey Jason —
>
> We've attached a few items to this email.
>
> 1. Update to send to the group — this outlines the pitch we are taking to FlitsNews next week. Let me know if you have any issues with that.
> 2. Pricing memo we discussed. Let me know if that needs to be adjusted.
> 3. Invoice from Georgetown Group — \$12,500 is due now and the remaining \$12,500 is due once we have the completed book.
>
> Let us know if you need anything else.
>
> Thanks!
> Christiana
>
> <3.12.21 Parker's Update.pdf>
> <Parker's Expenses Memo.pdf>
>
> <Baker Hostetler Invoice 022321A.doc>
>
> Christiana Purves
> Vice President
> 770-656-5108
> Laurensigroup.com
>
>
>

Page 229 of 849

CONFIDENTIAL LAURENSGROUP_003026

CONFIDENTIAL

Monday, April 4, 2022 at 15:45:36 Eastern Daylight Time

Subject: Re: 3,3,21 Parker's Update

Date: Wednesday, March 3, 2021 at 3:59:45 PM Eastern Standard Time

From: Christiana Purves <christiana@laurensgruop.com>

To: Wesley Donehue <wesleydonehue@gmail.com>

CC: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>, Marisa Brand <marisa@laurensgruop.com>

Yes, we paid the \$2,500.

On Mar 3, 2021, at 3:57 PM, Wesley Donehue <wesleydonehue@gmail.com> wrote:

Did you tell the research team that I would cover the extra cost beyond what Jason wanted to pay?

On Wed, Mar 3, 2021 at 3:32 PM Christiana Purves <christiana@laurensgruop.com> wrote:

Hi Greg and Jason —

Attached you will find an update on where we are with pitching Parker's narrative to the press. The PI has been in the field tracking Buster and was able to confirm the vehicle Paul is driving. She has trackers on both of the vehicles and will use those to track their habits, and ultimately catch Paul acting belligerent.

The research team has begun expanding upon the existing research and organizing the existing research into a format we can use to start pitching aspects of our narrative. Contract is signed and I believe they've sent the initial invoice to Jason.

Let me know if you all would like to schedule a call with the PI. She will continue to upload surveillance and reports to our Murdaugh folder.

Thank you!
Christiana

Page 257 of 849

CONFIDENTIAL LAURENSGROUP_003054

CONFIDENTIAL

Subject: PI Update on Murdaugh

Date: Tuesday, March 2, 2021 at 11:48:07 AM Eastern Standard Time

From: Christiana Purves <christiana@laurensgroup.com>

To: Jason D'Cruz <jdcruz@bakerlaw.com>

CC: Marisa Brand <marisa@laurensgroup.com>

Hi Jason —

The PI uploaded a report from her surveillance this weekend and verification of Paul's vehicle. A GPS tracker has been placed on his truck. Let me know if you have issues accessing the folder. Thanks!

<https://www.dropbox.com/sh/gjxymbwce044wrr/AAcymMKZYIFl0S/g3HXGF05a?dl=0>

Christiana Purves
Vice President
770-656-5108
Laurensgroup.com

Page 260 of 249

CONFIDENTIAL LAURENSGROUP_003057

CONFIDENTIAL

To: D'Cruz, Jason <jdcruz@bakerlaw.com>
Cc: John Neumann <jneumann@georgetowngroup.com>; wesley@pushdigital.com; Marisa Brand
<marisa@pushdigital.com>
Subject: Re: Research for Parker's

Hey John --

Spoke with Jason this afternoon and he'd like the contract to be between you all and BakerHostetler LLP.
Jason is also finalizing the current research they have to send over to you, as well as the engagement
letter.

Thanks!
Christiana

On Jan 22, 2021, at 9:42 AM, D'Cruz, Jason <jdcruz@bakerlaw.com> wrote:

John,

Give me a call at your convenience. 404-457-7601. Thanks.

From: John Neumann <jneumann@georgetowngroup.com>
Sent: Thursday, January 21, 2021 5:49 PM
To: Christiana Purves <christiana@laurensgruop.com>
Cc: D'Cruz, Jason <jdcruz@bakerlaw.com>; wesley@pushdigital.com; Marisa Brand
<marisa@pushdigital.com>
Subject: Re: Research for Parker's

[External Email: Use caution when clicking on links or opening attachments.]

Thanks Christiana. Glad to look over any existing research that Jason can provide.

On Jan 21, 2021, at 4:38 PM, Christiana Purves
<christiana@laurensgruop.com> wrote:

Hi John --

Wanted to put you on an email with Jason who works for Greg Parker to discuss
the proposal you sent over to us earlier. Jason has some research that they've
done internally that may reduce the amount of research needed from you all,
but wanted you to take a look and give us your thoughts.

I'll let Jason send over the research they have on this case. And so you
everyone has it at the top of their inbox, I've attached the research proposal
from John.

Thanks,
Christiana

Christiana Purves
Vice President
770-666-6103 (Cell)



<Research Proposal.doc>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result of e-mail transmission.

No engagement letter. We will enter into your contract. Please send so I can review. As we discussed, please insert a modest retainer so we can send the information to you and then you can revise the quote for services. Thanks.

From: Christiana Purves <christiana@laurensgroup.com>

Sent: Friday, February 5, 2021 3:24 PM

To: D'Cruz, Jason <jdcruz@bakerlaw.com>

Cc: John Neumann <jneumann@georgetowngroup.com>; wesley@pushdigital.com; Marisa Brand <marisa@pushdigital.com>

Subject: Re: Research for Parker's

Hey John —

CONFIDENTIAL

Monday, April 4, 2022 at 15:45:45 Eastern Daylight Time

Subject: Re: 1.29.21 Parker's Update
Date: Thursday, February 4, 2021 at 8:01:19 PM Eastern Standard Time
From: Greg Parker <gparker@parkersav.com>
To: D'Cruz, Jason <jdcruz@bakerlaw.com>
CC: Christiana Purves <christiana@laurensgruop.com>, Wesley Donehue <wesleydonehue@gmail.com>, Marisa Brand <marisa@pushdigital.com>

Please

Sent from my iPhone

On Feb 4, 2021, at 5:53 PM, D'Cruz, Jason <jdcruz@bakerlaw.com> wrote:

For attorney client privilege issues, Baker should engage her. Thanks.

From: Christiana Purves <christiana@laurensgruop.com>
Sent: Tuesday, February 2, 2021 1:49 PM
To: gparker@parkersav.com; D'Cruz, Jason <jdcruz@bakerlaw.com>
Cc: Wesley Donehue <wesleydonehue@gmail.com>; Marisa Brand <marisa@pushdigital.com>
Subject: Re: 1.29.21 Parker's Update

(External Email: Use caution when clicking on links or opening attachments.)

Jason — I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thanks!

> On Jan 29, 2021, at 10:42 AM, Christiana Purves <christiana@laurensgruop.com> wrote:

>

>

> Good morning,

>

> Attached you will find an update on where we are with the strategy we discussed to begin changing the narrative in support of Parker's. The two main items we need in order to begin working with reporters are the research to develop a road map and citations for the press, and a private investigator to verify Paul Murdaugh's reckless behavior and discover additional information on the players in this case.

>

> Let us know if you need anything else from us to lockdown the research firm and private investigator or if you'd like to discuss any of this further.

>

> Thank you!

> Christiana

> <Parker's Update 1_29_21.pdf>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Page 296 of 349

CONFIDENTIAL LAURENSGROUP_003093

CONFIDENTIAL

Subject: Re: Parker's: Strategy Memo from Laurens Group
Date: Tuesday, January 26, 2021 at 8:46:50 PM Eastern Standard Time
From: Christiana Purves <christiana@laurensgroup.com>
To: D'Cruz, Jason <jdcruz@bakerlaw.com>
CC: Kingsley Roda <kingsley@pushdigital.com>, Marisa Brand <marisa@pushdigital.com>, gparker@parkersav.com <gparker@parkersav.com>, wesley@pushdigital.com <wesley@pushdigital.com>

Attachments: Image001.png

No. However, she works with several prominent attorneys in the area and comes recommended by a colleague.

On Tue, Jan 26, 2021 at 8:20 PM D'Cruz, Jason <jdcruz@bakerlaw.com> wrote:

Have you used this Investigator before?

From: Christiana Purves <christiana@laurensgroup.com>
Sent: Tuesday, January 26, 2021 6:07 PM
To: D'Cruz, Jason <jdcruz@bakerlaw.com>; gparker@parkersav.com
Cc: wesley@pushdigital.com; Marisa Brand <marisa@pushdigital.com>; Kingsley Roda <kingsley@pushdigital.com>
Subject: Re: Parker's: Strategy Memo from Laurens Group

Good evening,

We have identified an excellent private investigator from SC who knows the state and the Beaufort/Hampton area well. She has already done preliminary research on Paul, the family, the lawyers and others involved in this case and she is confident that she'll be able to track Paul, get photos/videos of him partying and being reckless at bars, but will also track down any hidden assets and investigate the connections between the lawyers and others.

After just the initial look into this case, she can already tell there's a lot to be uncovered here. She can be in Hampton County as early as tomorrow and begin tracking his movements. She will begin working covert until we get what we need on Paul and the family, to be sure no one is tipped off.

I've attached the proposal to this email. Let us know what you all think and if you want to discuss, but we think we should get her on board as soon as possible so she can start giving us reports.

Page 811 of 349

CONFIDENTIAL LAURENSGROUP_003108

Best,

Christiana

On Wed, Jan 20, 2021 at 4:44 PM Christiana Purves <christiana@laurensgroup.com> wrote:

Good afternoon,

Following up on the research aspect of the strategy memo. Attached is a proposal from Georgetown Group. The price is a little higher than we initially expected due to the complex nature of the research needed, but we think we should move forward on the initial \$30,000. Let us know your thoughts.

Best,

Christiana

Christiana Purves
Vice President
770-666-5103 (Cell)



On Wed, Jan 20, 2021 at 11:17 AM Marisa Brand <marisa@pushdigital.com> wrote:

Good morning!

I'm adding Kingsley here to help us set up a call to walk through this plan for the end of the week or early next week.

Thanks,

Marisa

On Fri, Jan 15, 2021 at 12:06 PM D'Cruz, Jason <jdcruz@bakerlaw.com> wrote:

Let's discuss. I have some concerns about FITS news approach.

CONFIDENTIAL

Monday, April 4, 2022 at 15:44:35 Eastern Daylight Time

Subject: Dally Memo
Date: Wednesday, May 12, 2021 at 11:59:37 AM Eastern Daylight Time
From: Wesley Donehue <wesley@pushdigital.com>
To: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>
CC: Christiana Purves <christiana@laurensgruop.com>, Marisa Brand <marisa@pushdigital.com>, Stokes-Murray, Lynn <LStokes-Murray@burr.com>, Bruning, Shannon <SBruning@burr.com>
Attachments: Parker's Update 5_11_21.pdf

Greg, I am sending today's memo because I have added some notes that I really need you to read. I have pasted them here also:

Many crises have started with "X reporter is my friend." **NO REPORTER IS YOUR FRIEND.**

A lot of us have good relationships with the press, but we always need to remember that they have their own agendas and cannot be trusted as "friends or friendly." There are members of the press who can be allies, but if they are claiming they can be trusted to write a story in the light you'd like yourself or the problem to be told, they are not being truthful or they are corrupt.

The job of the press is to report on the news, even though most of them have their own agendas. The ones we find who have less of a bias than others are still expected to report on the issue, so if something is said on or off the record that is off color or that peaks their interest, we should expect it to be on the front page of the paper the next morning. We know we're stating the obvious, but just want everyone to keep that in the back of their minds when engaging with reporters no matter how friendly they may be towards us.

Greg, I am extremely concerned that you are talking to reporters that you deem as friendly and I am especially worried that you are talking to national reporters without us involved. We all agreed on a press strategy - local papers first. This is because we are more likely to sway local reporters with the angle we want. We can then take those local stories to the national press. National press is way more likely to follow the angle of a local reporter than an angle we are pushing.

Greg, even more so, I am VERY concerned with the way you can come across to these reporters. I know it's hard sometimes to see yourself from the view of a reporter, legislator or even a potential juror because you're in the middle of the lawsuit, but you are a very wealthy CEO who might come across as playing the victim when a young woman was killed. One state

Page 28 of 349

CONFIDENTIAL LAURENSGROUP_002825

CONFIDENTIAL

senator told me exactly that.

Again, I want to emphasize - THIS IS NOT A NORMAL BUSINESS STORY. A young woman is dead and you could be held financially liable. The image is not good at all. You could very easily be labeled as the wealthy gas tycoon who doesn't care about a dead girl as long as you can stay in business and get richer. We all know that is absolutely not true, but that is how the other side will try to define you. That's exactly how I expect Dick Harpootlian to frame you on the Senate floor.

That's also the way you could come across to a reporter if you aren't incredibly careful. And truthfully, if you don't slow down and stop looking so aggressive, that's exactly the way I think this will end up. Why take the risk? Slow down, let us handle the reporters. Keep yourself away from reporters until we need you. Do a cost benefit analysis of this and you will see that the benefits could come at extreme cost to your reputation and your legacy.

I know you are annoyed by how slow this is happening but I ask you to take note of a few things. During COVID when businesses are struggling to even stay open and have way bigger fish to fry than this issue, we have made it a top issue for leading associations. The Majority Leader of the Senate is sponsoring a bill with an all-star roster of cosponsors. We just got the research back 45 days ago and pitched this story to reporters three weeks ago, with two of them at the P&C hoping to get this thing done. No one has reported on this yet, so it will understandably take a little longer while the reporters get a grasp on the issue. We need to slow down, stick to the strategy and stop making moves that could get you in trouble.

Another item to note is the ultimate press strategy for Parker's. As discussed, the best case scenario would be to have the press start looking into joint and several liability issues and connect them to Harpootlian in order to ultimately have the jury view Parker's in the best light and see the Murdaugh's for who they are. In order to do this, we need the local press to first report on this issue. Hampton and Beaufort County residents will read the Post and Courier, the State, the Hilton Head Island Packet, the Beaufort Gazette before they read national papers.

Wesley Donahue
CEO
843.460.7990 (cell)
843.2256528 (office)

CONFIDENTIAL

you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

Wesley Donehue
CEO
843.460.7990 (cell)
843.2256528 (office)

Subject: Re: April 14th
Date: Tuesday, April 6, 2021 at 11:57:09 AM Eastern Daylight Time
From: Wesley Donehue <wesley@pushdigital.com>
To: Greg Parker <gparker@parkersav.com>
CC: Bruning, Shannon <SBruning@burr.com>, Christiana Purves
<christiana@laurens-group.com>, Stokes-Murray, Lynn <LStokes-Murray@burr.com>
Attachments: Image001.png

Ok.

Will — anything salacious.

P&C - substantive issue stuff.

On Tue, Apr 6, 2021 at 11:44 AM Greg Parker <gparker@parkersav.com> wrote:

I continue to wonder if the Post and Courier is a better vehicle for tort reform. I have a great relationship with them already. At what point do we try to use them rather than Will? Will might be a great partner for the Murdaughs but the P&C might be better for tort reform. Wesley please include this in your strategy memo. G

Greg Parker

CEO

The Parker Companies

17 W. McDonough St.

Savannah, GA 31401

www.parkersav.com

Office: 912.721.2881

CONFIDENTIAL

1/28/22, 3:27 PM

Gmail - 3.3.21 Parker's Update



Wesley Donohue <wesleydonohue@gmail.com>

3.3.21 Parker's Update

3 messages

Christlana Purves <christlana@laurensgruop.com>
To: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>
Cc: Wesley Donohue <wesleydonohue@gmail.com>, Marisa Brand <marisa@laurensgruop.com>

Wed, Mar 3, 2021 at 3:32 PM

Hi Greg and Jason —

Attached you will find an update on where we are with pitching Parker's narrative to the press. The PI has been in the field tracking Buster and was able to confirm the vehicle Paul is driving. She has trackers on both of the vehicles and will use those to track their habits, and ultimately catch Paul acting belligerent.

The research team has begun expanding upon the existing research and organizing the existing research into a format we can use to start pitching aspects of our narrative. Contract is signed and I believe they've sent the initial invoice to Jason.

Let me know if you all would like to schedule a call with the PI. She will continue to upload surveillance and reports to our Murdaugh folder.

Thank you!
Christlana

Christlana Purves
Vice President
770-868-5103
Laurensgruop.com

3.3.21 Parker's Update.pdf
85K

Wesley Donohue <wesleydonohue@gmail.com>
To: Christlana Purves <christlana@laurensgruop.com>
Cc: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>, Marisa Brand <marisa@laurensgruop.com>

Wed, Mar 3, 2021 at 3:56 PM

Did you tell the research team that I would cover the extra cost beyond what Jason wanted to pay?

[Quoted text hidden]
[Quoted text hidden]
Christlana Purves
Vice President
770-868-5103
Laurensgruop.com

Wesley Donohue
CEO | Push Digital
www.pushdigital.com

e. wesley@pushdigital.com
o. 848.460.7880
t. twitter.com/wesleydonohue

<https://mail.google.com/mail/u/0/?ik=d201e42234&view=pt&search=all&permmsgid=thread-f903A1693244257330431728&siml=msg-f903A1693244257330431728...> 1/2

CONFIDENTIAL LAURENSGROUP_001074

CONFIDENTIAL

1/28/22, 3:27 PM

Gmail - 3/3/21 Parker's Update

f, facebook.com/wesleydonehue

#####

Christlana Purves <christlana@laurensgruop.com>

Wed, Mar 3, 2021 at 3:59 PM

To: Wesley Donehue <wesleydonehue@gmail.com>

Cc: Greg Parker <gparker@parkersav.com>, Jason D'Cruz <jdcruz@bakerlaw.com>, Marisa Brand
<marisa@laurensgruop.com>

Yus, we paid the \$2,500.

On Mar 3, 2021, at 3:57 PM, Wesley Donehue <wesleydonehue@gmail.com> wrote:

[Quoted text hidden]

<https://mail.google.com/mail/u/0/?ik=d2e1a42234&view=pt&search=all&permthid=thread-f%3A1693244257330431728&siml=msg-f%3A1693244257330431728...> 2/2

CONFIDENTIAL LAURENSGROUP_001075

CONFIDENTIAL

1/28/21, 3:37 PM

Gmail - Re: 1.29.21 Parker's Update



Wesley Donehue <wesleydonehue@gmail.com>

Re: 1.29.21 Parker's Update

1 message

Thu, Feb 4, 2021 at 3:32 PM

Christiana Purves <christiana@laurensigroup.com>

To: Greg Parker <gparker@parkersav.com>

Co: Marisa Brand <marisa@laurensigroup.com>, Jason D'Cruz <jdcruz@bakerlaw.com>, Wesley Donehue <wesleydonehue@gmail.com>

Great! We will get moving on it.

> On Feb 4, 2021, at 2:21 PM, Greg Parker <gparker@parkersav.com> wrote:

>

> Yea we are. Total focus to get pictures of Paul Drinking

>

> Sent from my iPhone

>

>> On Feb 4, 2021, at 2:51 PM, Christiana Purves <christiana@laurensigroup.com> wrote:

>>

>> Just wanted to touch base before the end of the week and see if you all are ready to move forward with the PI.

>>

>> Let us know if you need anything from us.

>>

>> Thanks!

>> Christiana

>>

>>> On Feb 2, 2021, at 1:49 PM, Christiana Purves <christiana@laurensigroup.com> wrote:

>>>

>>> Jason — I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thanks!

>>>

>>> <Paul Murdaugh Investigation Contract.pdf>

>>>

>>>

>>>> On Jan 29, 2021, at 10:42 AM, Christiana Purves <christiana@laurensigroup.com> wrote:

>>>>

>>>>

>>>>

>>>> Good morning,

>>>>

>>>> Attached you will find an update on where we are with the strategy we discussed to begin changing the narrative in support of Parker's. The two main items we need in order to begin working with reporters are the research to develop a road map and citations for the press, and a private investigator to verify Paul Murdaugh's reckless behavior and discover additional information on the players in this case.

>>>>

>>>> Let us know if you need anything else from us to lockdown the research firm and private investigator or if you'd like to discuss any of this further.

>>>>

>>>> Thank you!

>>>> Christiana

>>>> <Parker's Update 1_29_21.pdf>

>

>

> The information contained in this communication from the sender is
> confidential. It is intended solely for use by the recipient and others
> authorized to receive it. If you are not the recipient, you are hereby
> notified that any disclosure, copying, distribution or taking action in
> relation of the contents of this information is strictly prohibited and may
> be unlawful.

<https://mail.google.com/mail/u/0/?ik=d2e1a42234&view=pt&search=all&permmsgid=thead-f%3A1690798152271408634&siml=msg-f%3A1690798152271408634> 1/1

CONFIDENTIAL LAURENSGROUP_001291

CONFIDENTIAL

Monday, April 4, 2022 at 12:22:56 Eastern Daylight Time

Subject: RE: Paul Murdaugh Investigation Contract
Date: Friday, February 5, 2021 at 2:22:33 PM Eastern Standard Time
From: D'Cruz, Jason <jdcruz@bakerlaw.com>
To: Christiana Purves <christiana@laurensgroup.com>
CC: Sara C. <sara@inquiryagency.net>, Marisa Brand <marisa@laurensgroup.com>

BakerHostetler LLP

Thanks,

-----Original Message-----

From: Christiana Purves <christiana@laurensgroup.com>
Sent: Friday, February 5, 2021 2:14 PM
To: D'Cruz, Jason <jdcruz@bakerlaw.com>
Cc: Sara C. <sara@inquiryagency.net>; Marisa Brand <marisa@laurensgroup.com>
Subject: Re: Paul Murdaugh Investigation Contract

[External Email: Use caution when clicking on links or opening attachments.]

Hey Sara — I'm putting you on an email with Jason D'Cruz. Parker's would like for the contract to be between you and the law firm, Baker.

Jason — Do you mind providing the exact name you'd like to have on the contract?

Thank you, both!

> On Feb 2, 2021, at 1:49 PM, Christiana Purves <christiana@laurensgroup.com> wrote:
>
> Jason — I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thanks!
>
> <Paul Murdaugh Investigation Contract.pdf>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result

Page 39 of 55

CONFIDENTIAL LAURENSGROUP_001723

CONFIDENTIAL

Monday, April 4, 2022 at 12:22:56 Eastern Daylight Time

of e-mail transmission.

Subject: Re: Paul Murdaugh Investigation Contract

Date: Friday, February 5, 2021 at 2:14:19 PM Eastern Standard Time

From: Christiana Purves <christiana@laurensgruop.com>

To: Jason D'Cruz <jdcruz@bakerlaw.com>

CC: Sara C. <sara@inquiryagency.net>, Marisa Brand <marisa@laurensgruop.com>

Hey Sara — I'm putting you on an email with Jason D'Cruz. Parker's would like for the contract to be between you and the law firm, Baker.

Jason — Do you mind providing the exact name you'd like to have on the contract?

Thank you, both!

> On Feb 2, 2021, at 1:49 PM, Christiana Purves <christiana@laurensgruop.com> wrote:

>

> Jason — I've attached the updated private investigator contract per our discussion. Let us know if this looks good and we'll get it signed. Thanks!

>

> <Paul Murdaugh Investigation Contract.pdf>

CONFIDENTIAL

Laurens Group

MEMORANDUM—South Carolina Project

To: Greg Parker

From: Wesley Donehue

Date: December 5, 2020

Overview

When faced with a multifaceted crisis that lay at the nexus of the law, politics, and media, I believe it is prudent to take strategic action in Parker's defense as it relates to the murder of Mallory Beach. Likewise, it is pragmatic to protect the future of the company's business in South Carolina and the great investment Parker's has already made in the state. The Laurens Group is prepared to develop and execute plans on two fronts—forming and solidifying a fact-based media narrative of the murder and its true perpetrators while also navigating the legislative initiatives that would prevent an inevitable insurance crisis for every seller of alcohol in the state. This document is meant to be a brief overview of the broader strategy segments that the Laurens Group would develop should it be retained by Parker's.

Telling the Whole Story

Considering the breadth and width of corruption, media manipulation, and blatant untruthfulness that has taken place thus far, the full story of Mallory Beach's murder must be told with more veracity and aggressive fact. The goal of telling the full story surrounding the Murdaugh family, their exploits, and their overt disdain for the rule of law is to dampen the family's influence among South Carolina officials who would then be hesitant to align themselves with such scandal, allowing for a more fair process to take its natural course. Additionally, and maybe more importantly, it places the blame on the murderer, Paul Murdaugh, and not Parker's in the minds and opinions of the public. I believe that the story must be told from third parties and not Parker's itself, insulating the company. Because so many aspects of the story contain elements of intrigue, I am confident that there will be significant interest on the part of media outlets to cover the story correctly.

The Laurens Group's work as it relates the above strategy may include, but is not limited to, the following:

- Seeding media placements in prominent South Carolina publications and digital properties
- Pitching national outlets on the "click bait" and scandalous aspects of the story for broadcast television and long-form print publications
- Developing talking points for 3rd party verifiers who will be quoted by the press



CONFIDENTIAL LAURENSGROUP_001356

CONFIDENTIAL

Laurens Group

- Creating a media research packet in conjunction with research professionals for dissemination among investigative journalists
- Tracking and investigating the Murdaugh's current corruption and poor lifestyle choices
- Surveying statewide public opinion on the story in general and opinions of the Murdaugh's and Parker's for strategic use
- Logging all media mentions and social media verbatim for tactical insight

Stopping An Insurance Crisis

Unfortunately, the end result of this circumstance may never be justice for Mallory Beach but, instead, the closure of South Carolina business and loss of thousands of jobs due to skyrocketing liability insurance for those who sell alcohol in the state. Every industry impacted—bars, restaurants, liquor stores, groceries, hotels and convenience stores—should be rallied together to influence state officials to create an environment where the businesses can thrive rather than face the threat of collapse. Likewise, during a difficult year with COVID restrictions putting many of these exact businesses on the brink, rising insurance costs compound stress placed on South Carolina's hospitality industry. The Laurens Group proposes developing a legislative strategy in conjunction with a seasoned lobbyist that pressures South Carolina's public officials to act swiftly on what is an impending crisis.

The Laurens Group's work as it relates the above strategy may include, but is not limited to, the following:

- Developing an advocacy group to be the voice of this legislation and tell the stories of small business owners who are struggling and are now being additionally victimized by bad legislation and greedy trial lawyers
- Recruiting the coalition of members of the above group among industry leaders, business owners and advocates
- Creating the paid media strategy and advertising that will ultimately pressure South Carolina at large to contact their legislators in favor of this new legislation
- The seeding of 'Letters to the Editors' of statewide publications advocating on behalf of the legislation
- The recruitment of high profile federal, state and locally elected and formerly elected officials to endorse the advocacy group

Retaining the Laurens Group

Our goal is to win and we'll do everything within our ability to accomplish our client's goals. It is very likely that achieving the two goals above will require actions and strategies that have not yet been perceived. We're not in the business of nickel and



CONFIDENTIAL LAURENSGROUP_001357

CONFIDENTIAL

Laurens Group

dimming our clients. We seek to have a long term relationship with every individual and organization with whom we work. We want raving fans who tell others about the quality and effectiveness of our talent. The Laurens Group is confident that we can develop and execute both goals laid out above.

Fees for these projects will be \$25,000 a month, for a period to be negotiated once knowledge of both the legal and legislative timelines are more clear. It is also likely that there will be additional costs once the plans are developed. As the plan is developed, we will make costs transparent and submit those for approval to Parker's before we execute upon them.

Finally, Parker's is the type of business with whom we want to be in the trenches. The pride you take in your work and what you've built is inspirational and worth defending. We would be honored to help you in any way we can.



CONFIDENTIAL LAURENSGROUP_001358