IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

RECEIVED
Nov 09 2026
S.C. SUPREME COURT

Clyde Marcus Jones, II, *on behalf of himself and all others similarly situated*,

Plaintiffs,

v.

Duke Energy Corporation and Duke Energy Carolinas, LLC,

Defendants.

Case No. 3:24-cv-01281-MGL

DUKE ENERGY CORPORATION AND DUKE ENERGY CAROLINAS, LLC'S MOTION FOR SUMMARY JUDGMENT

EXHIBIT LIST

Exhibit	Title/Description
1	Deposition of Jeff Lineberger, Mar. 20, 2026
2	"Duke Power Company Reservoir Mosquito Control Program, 1923-1998: A Brief History," DUK_00003571
3	"A Brief Summary of Duke Power Company's WWII (1942-1943) Mosquito Control," DUK_00000027
4	"Duke Power Company Impoundment Mosquito Control Program," DUK_00002581
5	"The Duke Power Company Reservoir Mosquito Control Program: Seventy Five Years of Service," DUK_00006812
6	Deposition of Bob Barden, Mar. 13, 2026
7	"Termination of Duke Energy's Mosquito Control Program | November 2016," DUK_00011453
8	"Duke Power Mosquito Control Program: Approximate Program Costs and Cost Reduction Options," DUK_00004508

9	"Invasive Aquatic Plant (weed) and Mosquito Control Services," DUK_00004366
10	Examples of Lake Wateree Mosquito Control Program Spray Logs, DUK_00001825
11	1943 Letter from D. F. Ashton to F. M. Boldridge, DUK_00000164
12	EPA Final Report, Feb. 25, 1976, "PCBs in the United States Industrial Use and Environmental Distribution," DUK_00100922
13	Exhibit JGL-1 to 30(b)(6) Deposition of Jeff Lineberger (excerpted)
14	Deposition of David Roche, Mar. 11, 2026
15	30(b)(6) Deposition of Jeff Lineberger, Apr. 20, 2026
16	Report of Harold W. Brown, MD, Aug. 12, 1968, DUK_00000536
17	Draft: "Present Approaches to Mosquito Control on Duke Power Company Impoundments," DUK_00000295
18	30(b)(6) Deposition of Zachary Hall, Apr. 20, 2026
19	Ex. ZSH-1 to 30(b)(6) Deposition of Zachary Hall (excerpted)
20	Deposition of James Glover, PhD, Mar. 27, 2026
21	Deposition of Deke Gunderson, PhD, Mar. 23, 2026
22	Deposition of Robert Workman, PhD, Mar. 11, 2026
23	Deposition of Gretchen Greene, PhD, Mar. 9, 2026
24	"1940s tales, risk of PCBs spur probe at Wateree," *The State*, Aug. 9, 1997
25	"State will test for PCBs in Lake Wateree fish," *The State*, Dec. 13, 2009
26	"Toxic chemicals in popular S.C. lake," *The State*, Aug. 25, 2010 (at DUK_00012100)
27	Deposition of Michael Tachovsky, PhD, Mar. 2, 2026
28	Greenville, S.C. news report, July 8, 2014, DUK_00012110
29	Deposition of Plaintiff Clyde Marcus Jones, II, Oct. 8, 2025
30	Deposition of Eric Butler, PhD, Apr. 8, 2026
31	Plat of 1778 Sailing Club Road, DUK_00100431

32	Property Records for 1778 Sailing Club Road, DUK_00100433
33	Deposition of John Milton Deal, Jr., Mar. 25, 2026
34	Certificate of Appraiser and Uniform Residential Appraisal Report, JONES_001249
35	Deposition of Martha Jones, Mar. 30, 2026
36	VRBO Listing and Reviews for 1778 Sailing Club Road (Ex. 5 to Plaintiff's Deposition)
37	Plaintiff's Response to Duke Energy's Request for Production No. 32
38	Westinghouse Electric Corporation 1979 correspondence, DUK_00102413
39	Deposition of Deborah Phillips, Mar. 27, 2026
40	Deposition of Dennis Phillips, Mar. 27, 2026
41	Tachovsky Expert Report (excerpted)
42	Deposition of William Beckham, Oct. 17, 2025
43	Deposition of Henry Beckham, Oct. 14, 2025

Exhibit 31

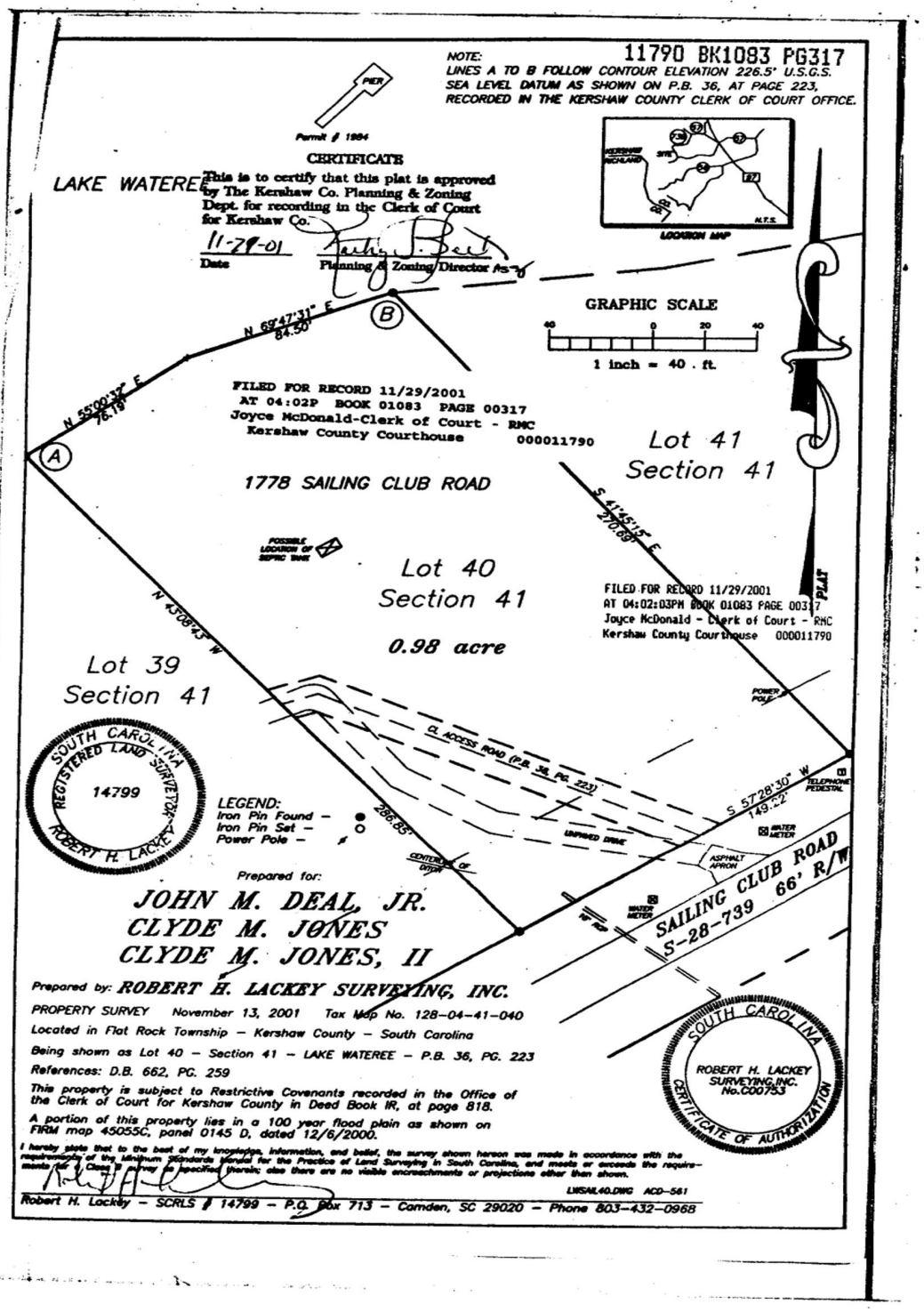
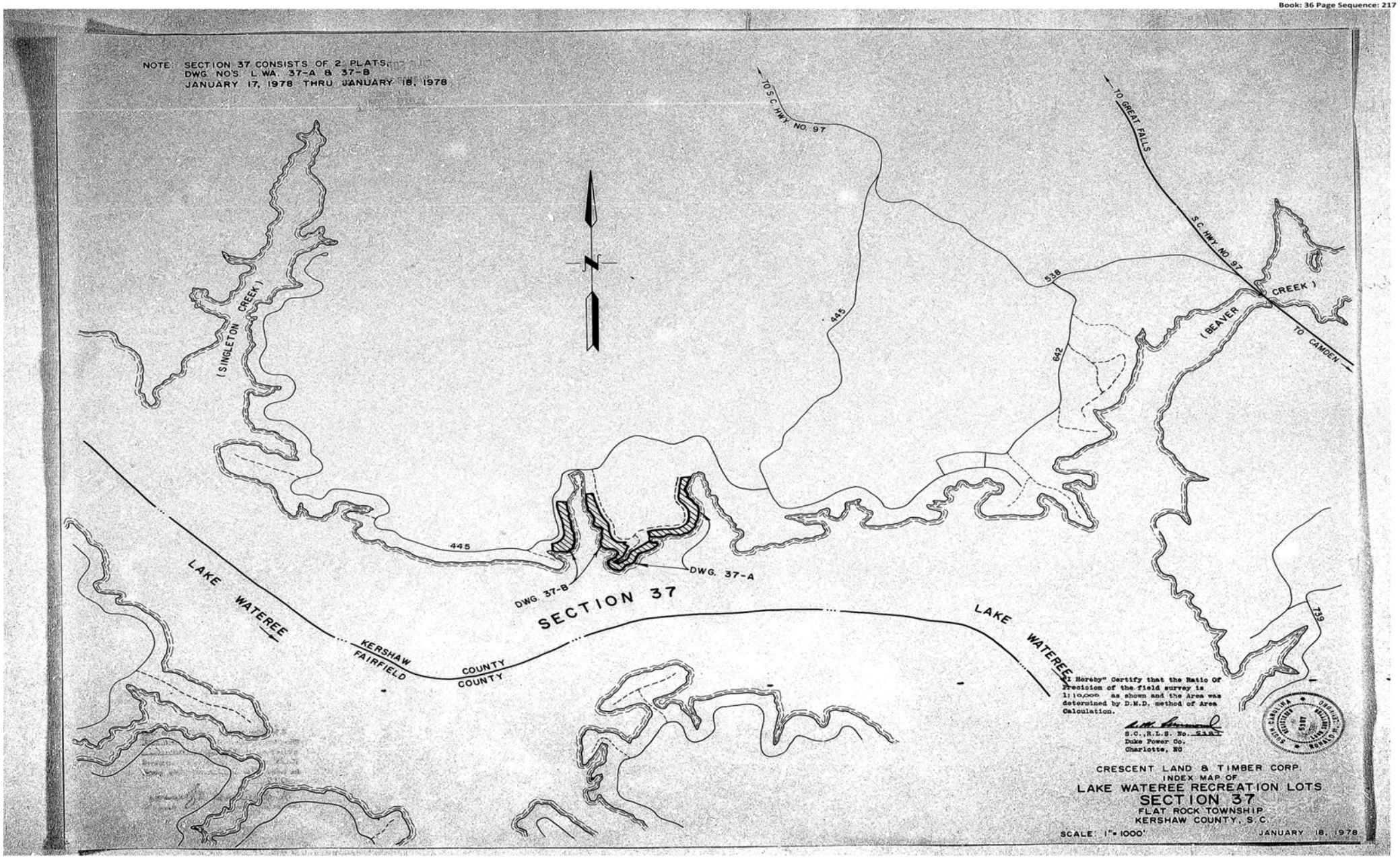
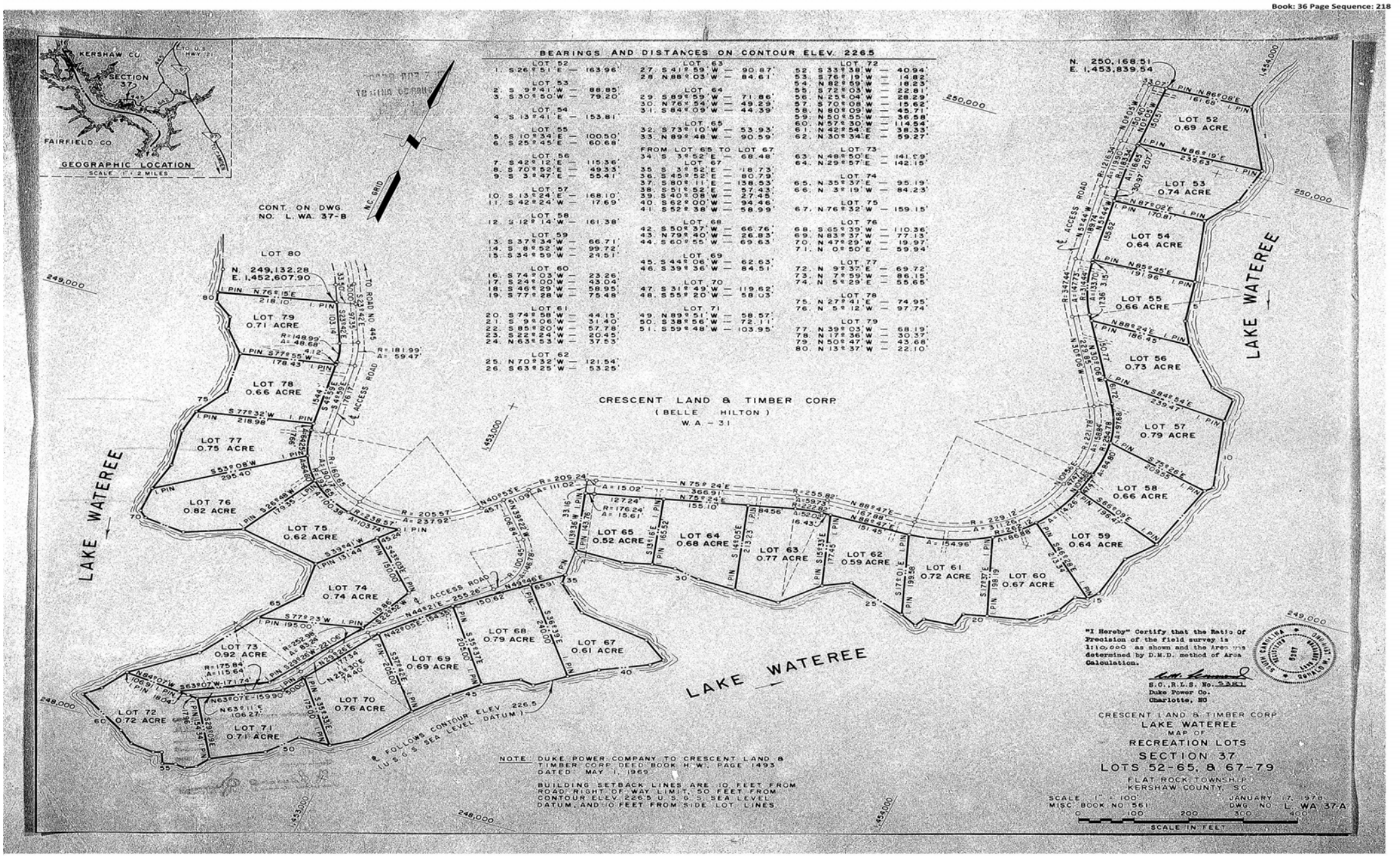

11790 BK1083 PG317
NOTE:
LINES A TO B FOLLOW CONTOUR ELEVATION 226.5' U.S.G.S.
SEA LEVEL DATUM AS SHOWN ON P.B. 36, AT PAGE 223,
RECORDED IN THE KERSHAW COUNTY CLERK OF COURT OFFICE.
PIER
Permit # 1984
CERTIFICATE
This is to certify that this plat is approved by The Kershaw Co. Planning & Zoning Dept. for recording in the Clerk of Court for Kershaw Co.
11-29-01
Date
Planning & Zoning Director
LAKE WATEREE
LOCATION MAP
GRAPHIC SCALE
1 inch = 40 . ft.
N 69°47'31" E
84.50'
N 55°00'37" E
78.19'
FILED FOR RECORD 11/29/2001
AT 04:02P BOOK 01083 PAGE 00317
Joyce McDonald-Clerk of Court - RMC
Kershaw County Courthouse 000011790
1778 SAILING CLUB ROAD
Lot 41
Section 41
S 41°45'15" E
270.69'
POSSIBLE LOCATION OF SEPTIC TANK
Lot 40
Section 41
0.98 acre
FILED FOR RECORD 11/29/2001
AT 04:02:03PM BOOK 01083 PAGE 00317
Joyce McDonald - Clerk of Court - RMC
Kershaw County Courthouse 000011790
PLAT
N 43°08'43" W
Lot 39
Section 41
POWER POLE
SOUTH CAROLINA
REGISTERED LAND SURVEYOR
14799
ROBERT H. LACKEY
LEGEND:
Iron Pin Found –
Iron Pin Set –
Power Pole –
286.85'
CL ACCESS ROAD (P.B. 36, PG. 223)
S 57°28'30" W
149.22'
TELEPHONE PEDESTAL
WATER METER
UNPAVED DRIVE
ASPHALT APRON
CENTERLINE OF DITCH
WATER METER
TIP
SAILING CLUB ROAD
S-28-739 66' R/W
Prepared for:
JOHN M. DEAL, JR.
CLYDE M. JONES
CLYDE M. JONES, II
Prepared by: ROBERT H. LACKEY SURVEYING, INC.
PROPERTY SURVEY November 13, 2001 Tax Map No. 128-04-41-040
Located in Flat Rock Township – Kershaw County – South Carolina
Being shown as Lot 40 – Section 41 – LAKE WATEREE – P.B. 36, PG. 223
References: D.B. 662, PG. 259
This property is subject to Restrictive Covenants recorded in the Office of the Clerk of Court for Kershaw County in Deed Book IR, at page 818.
A portion of this property lies in a 100 year flood plain as shown on FIRM map 45055C, panel 0145 D, dated 12/6/2000.
I hereby state that to the best of my knowledge, information, and belief, the survey shown hereon was made in accordance with the requirements of the Minimum Standards Manual for the Practice of Land Surveying in South Carolina, and meets or exceeds the requirements for a Class S survey as specified therein; also there are no visible encroachments or projections other than shown.
LWSAL40.DWG ACD-561
Robert H. Lackey – SCRLS # 14799 – P.O. Box 713 – Camden, SC 29020 – Phone 803-432-0968
SOUTH CAROLINA
ROBERT H. LACKEY SURVEYING, INC.
No.C00753
CERTIFICATE OF AUTHORIZATION

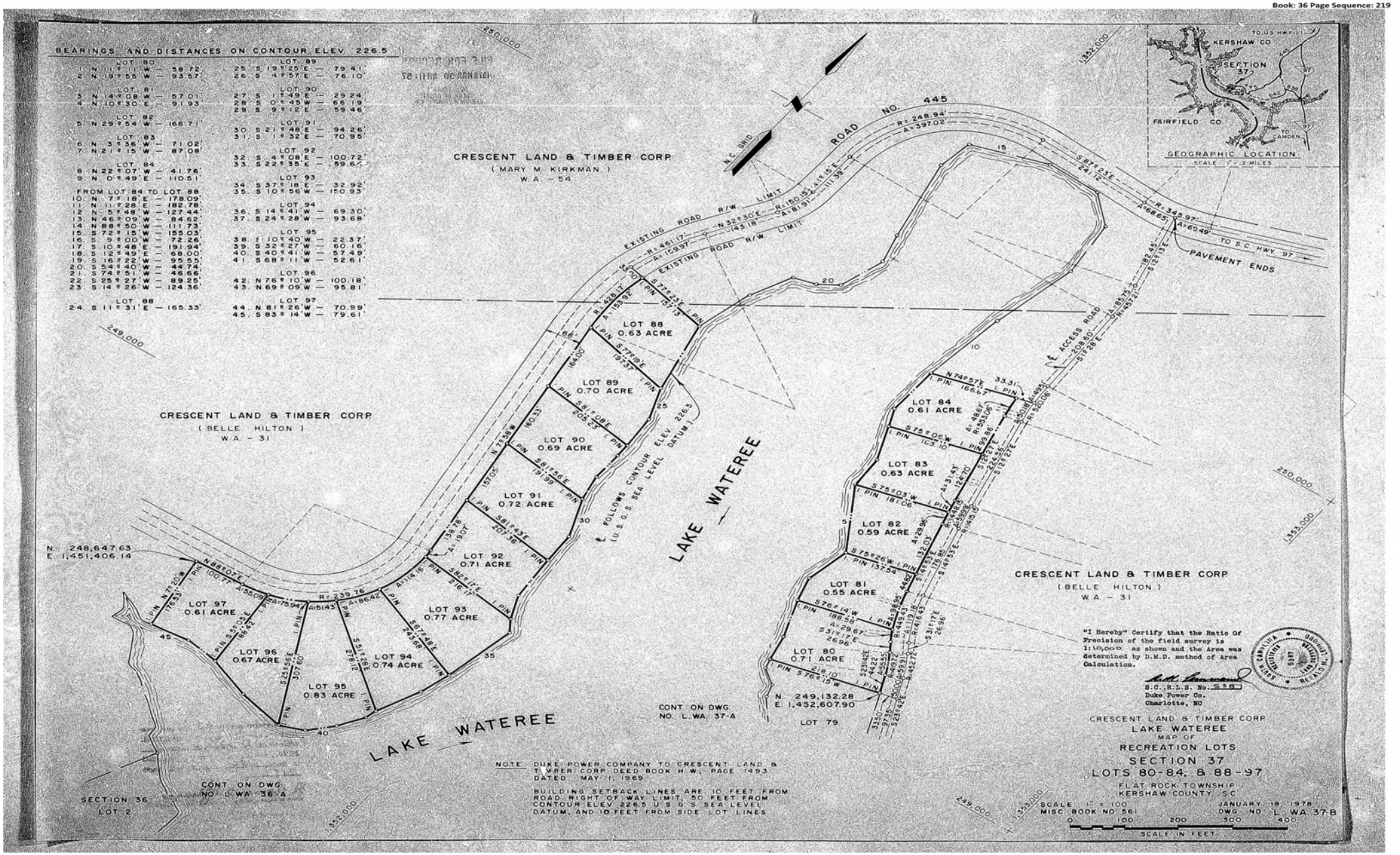
Exhibit 32

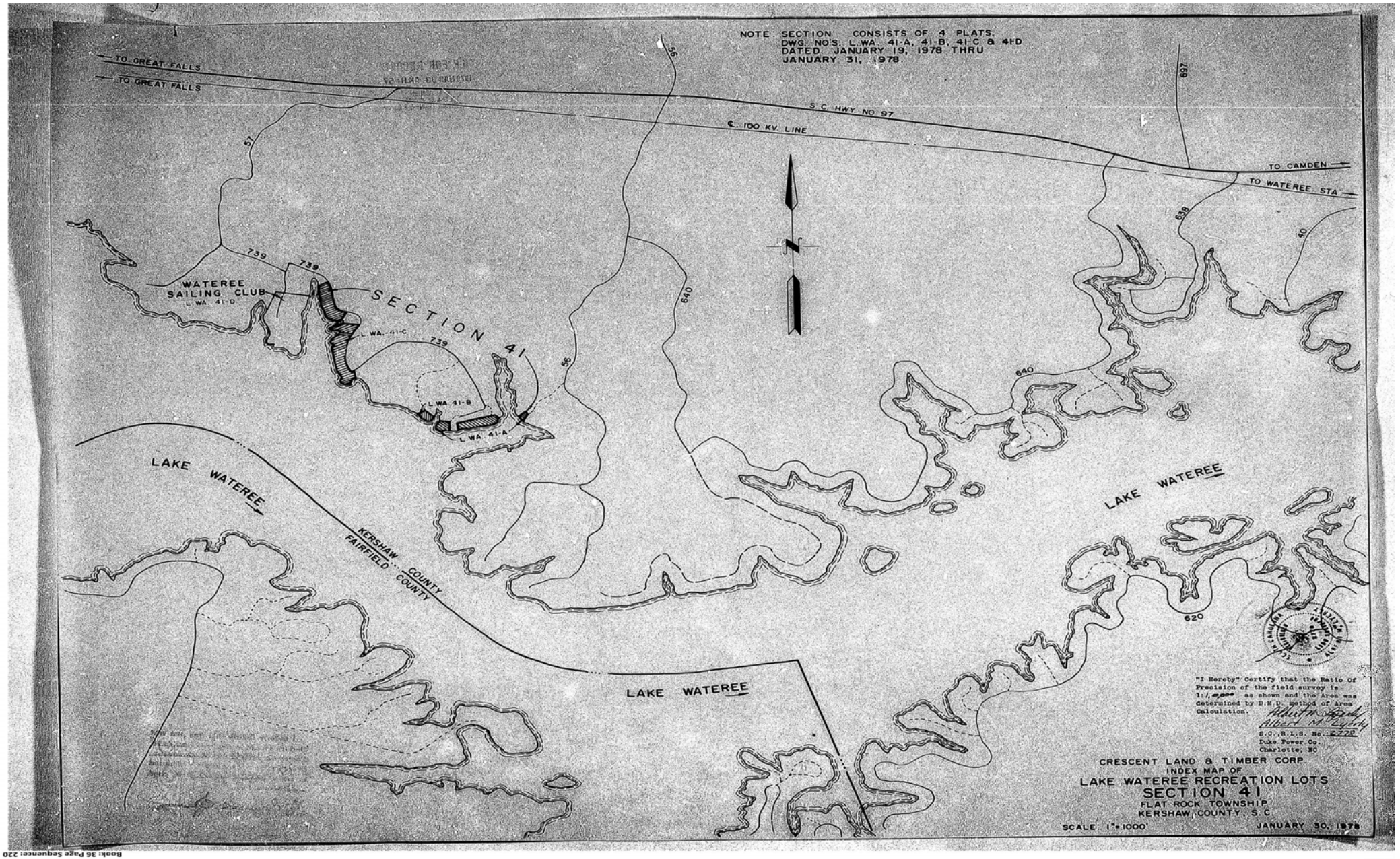
Book: 36 Page Sequence: 217

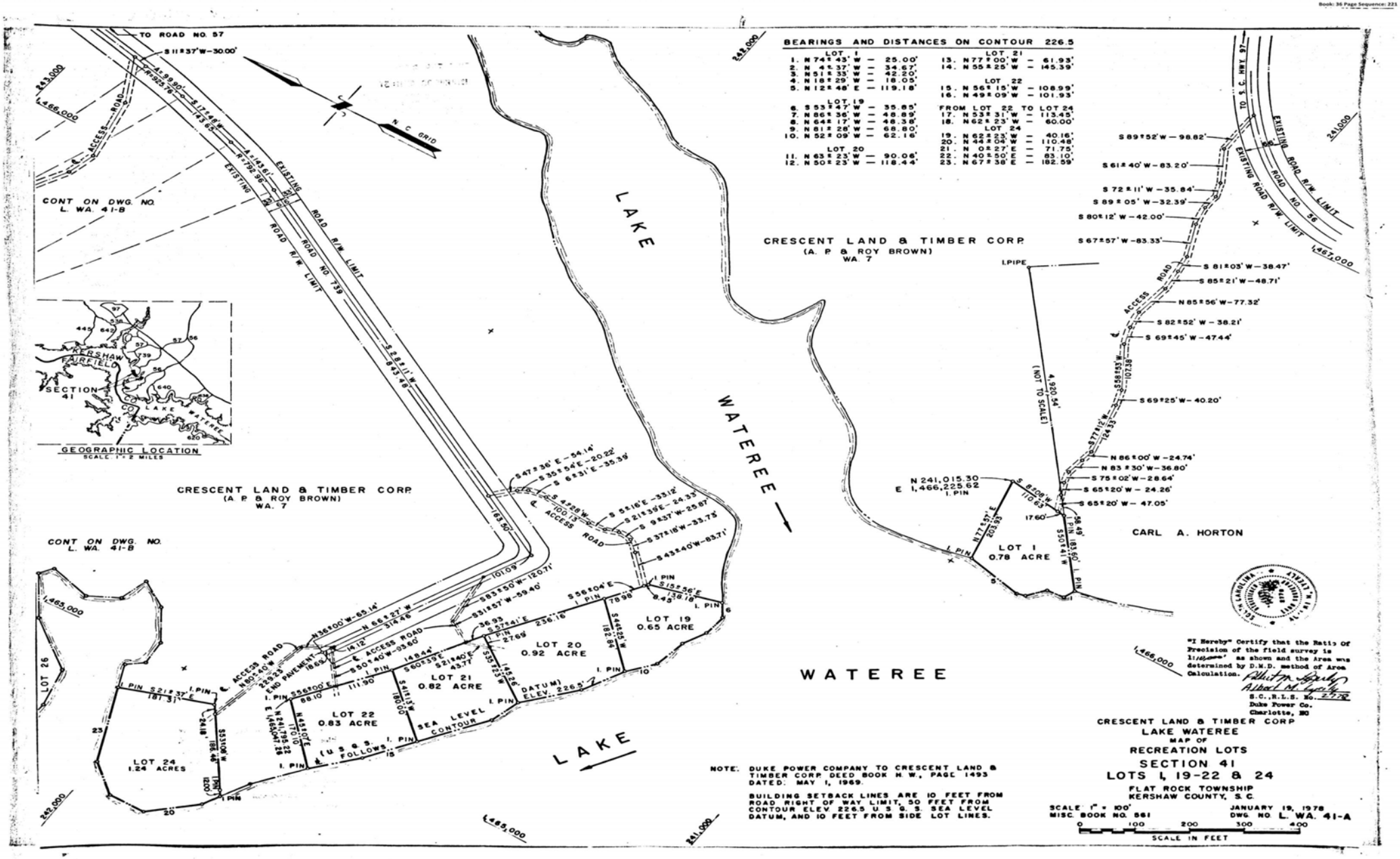



Book: 36 Page Sequence: 218
KERSHAW CO.
SECTION 37
FAIRFIELD CO.
GEOGRAPHIC LOCATION
SCALE 1" = 2 MILES
TO U.S. HWY 21
N.C. GRID
CONT. ON DWG. NO. L. WA. 37-8
BEARINGS AND DISTANCES ON CONTOUR ELEV. 226.5
N. 250,168.51
E. 1,453,839.54
N. 249,132.28
E. 1,452,607.90
LOT 80
LOT 79 0.71 ACRE
LOT 78 0.66 ACRE
LOT 77 0.75 ACRE
LOT 76 0.82 ACRE
LOT 75 0.62 ACRE
LOT 74 0.74 ACRE
LOT 73 0.92 ACRE
LOT 72 0.72 ACRE
LOT 71 0.71 ACRE
LOT 70 0.76 ACRE
LOT 69 0.69 ACRE
LOT 68 0.79 ACRE
LOT 67 0.61 ACRE
LOT 65 0.52 ACRE
LOT 64 0.68 ACRE
LOT 63 0.77 ACRE
LOT 62 0.59 ACRE
LOT 61 0.72 ACRE
LOT 60 0.67 ACRE
LOT 59 0.64 ACRE
LOT 58 0.66 ACRE
LOT 57 0.79 ACRE
LOT 56 0.73 ACRE
LOT 55 0.66 ACRE
LOT 54 0.64 ACRE
LOT 53 0.74 ACRE
LOT 52 0.69 ACRE
CRESCENT LAND & TIMBER CORP
(BELLE HILTON)
W.A. - 31
LAKE WATEREE
TO ROAD NO. 445
ACCESS ROAD
FOLLOWS CONTOUR ELEV 226.5 (U.S.G.S. SEA LEVEL DATUM)
NOTE: DUKE POWER COMPANY TO CRESCENT LAND & TIMBER CORP. DEED BOOK H-W, PAGE 1493 DATED MAY 1, 1969.
BUILDING SETBACK LINES ARE 10 FEET FROM ROAD RIGHT-OF-WAY LIMIT, 50 FEET FROM CONTOUR ELEV. 226.5 U.S.G.S. SEA LEVEL DATUM, AND 10 FEET FROM SIDE LOT LINES
"I Hereby" Certify that the Ratio of Precision of the field survey is 1:10,000 as shown and the Area was determined by D.M.D. method of Area Calculation.
S.C. R.L.S. No. 5361
Duke Power Co.
Charlotte, NC
CRESCENT LAND & TIMBER CORP
LAKE WATEREE
MAP OF
RECREATION LOTS
SECTION 37
LOTS 52-65, & 67-79
FLAT ROCK TOWNSHIP
KERSHAW COUNTY, S.C.
SCALE 1" = 100'
JANUARY 17, 1978
MISC. BOOK NO. 561
DWG. NO. L. WA 37-A
SCALE IN FEET

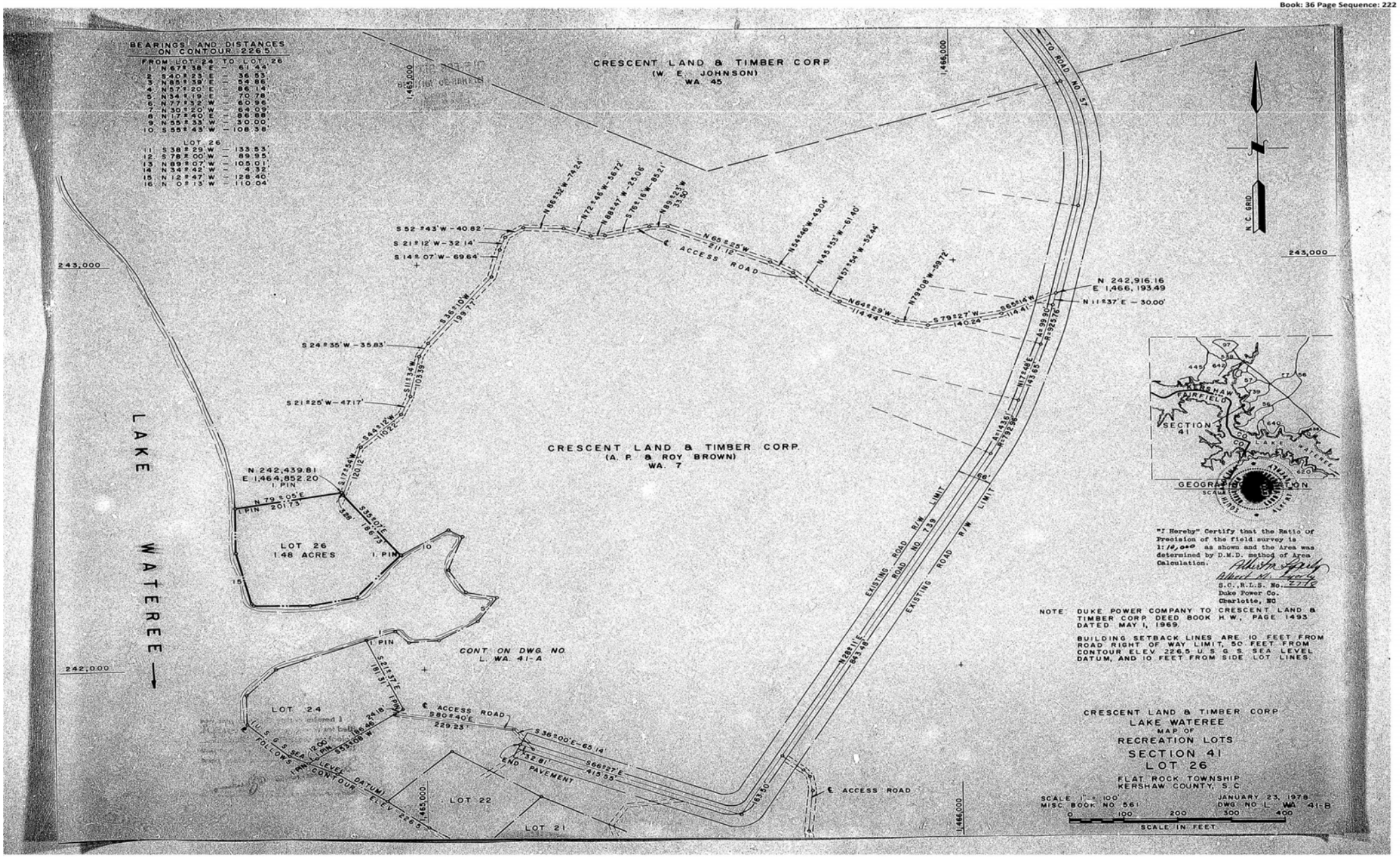
Book: 36 Page Sequence: 219

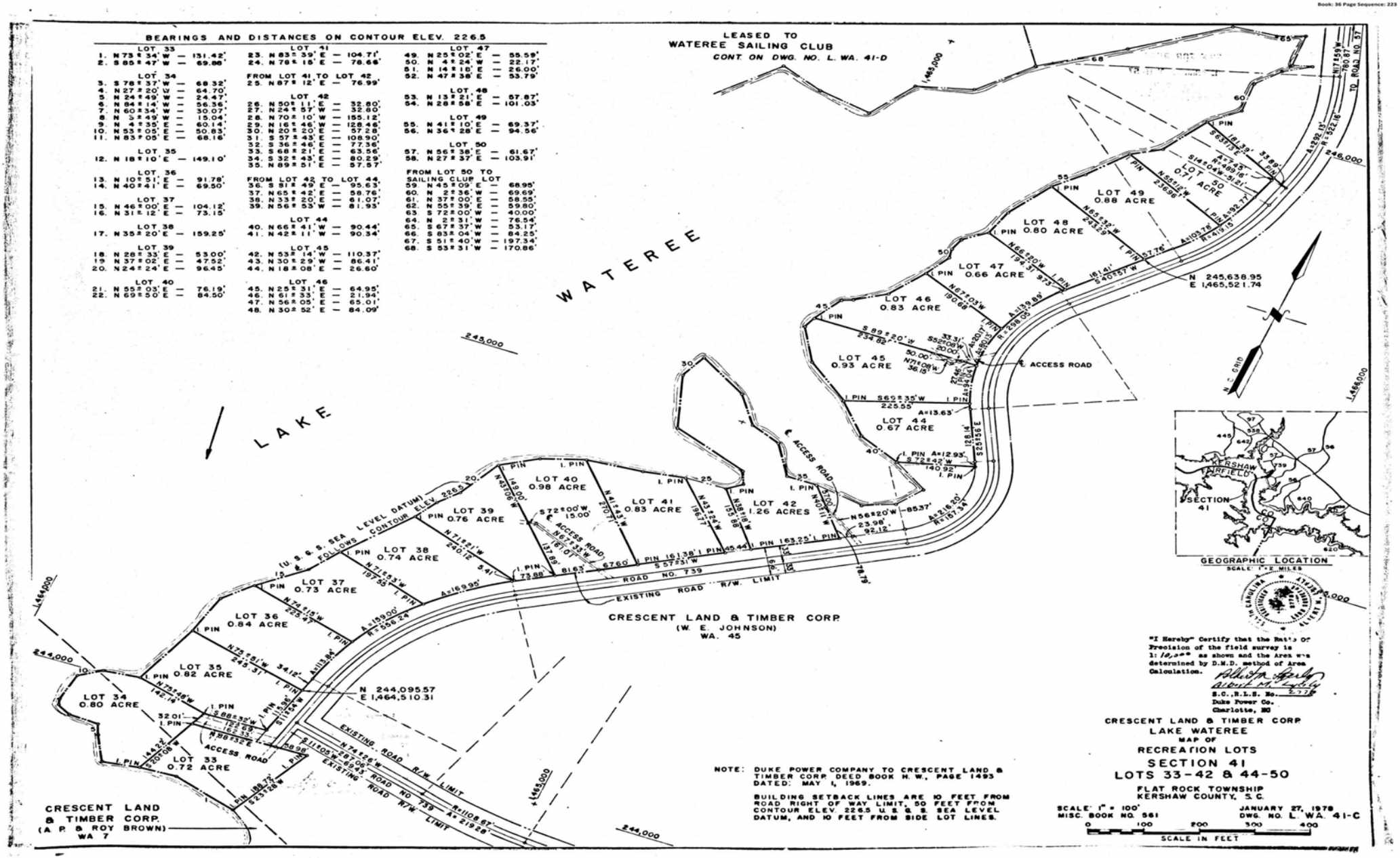



NOTE SECTION CONSISTS OF 4 PLATS,
DWG. NO'S. L.WA. 41-A, 41-B, 41-C & 41-D
DATED JANUARY 19, 1978 THRU
JANUARY 31, 1978.
TO GREAT FALLS
TO GREAT FALLS
S.C. HWY. NO. 97
℄ 100 KV. LINE
TO CAMDEN
TO WATEREE STA.
WATEREE SAILING CLUB
L.WA. 41-D
SECTION 41
L.WA. 41-C
L.WA. 41-B
L.WA. 41-A
LAKE WATEREE
KERSHAW COUNTY
FAIRFIELD COUNTY
LAKE WATEREE
LAKE WATEREE
"I Hereby" Certify that the Ratio Of Precision of the field survey is 1:1,000+ as shown and the Area was determined by D.M.D. method of Area Calculation.
Albert McCurdy
S.C., R.L.S. No. 2778
Duke Power Co.
Charlotte, NC
CRESCENT LAND & TIMBER CORP.
INDEX MAP OF
LAKE WATEREE RECREATION LOTS
SECTION 41
FLAT ROCK TOWNSHIP
KERSHAW COUNTY, S.C.
SCALE 1"=1000'
JANUARY 30, 1978


TO ROAD NO. 57
S 11° 37' W - 30.00'
ACCESS ROAD
EXISTING ROAD R/W LIMIT
ROAD NO. 739
CONT ON DWG. NO. L. WA. 41-B
N. C. GRID
LAKE
WATEREE
GEOGRAPHIC LOCATION
SCALE: 1" = 2 MILES
KERSHAW
FAIRFIELD
SECTION 41
CRESCENT LAND & TIMBER CORP
(A. P. & ROY BROWN)
WA. 7
BEARINGS AND DISTANCES ON CONTOUR 226.5
LOT 1
1. N 74° 43' W - 25.00'
2. N 41° 37' W - 34.67'
3. N 51° 33' W - 42.20'
4. N 18° 29' W - 18.05'
5. N 12° 48' E - 119.18'
LOT 19
6. S 53° 47' W - 35.85'
7. N 86° 36' W - 48.89'
8. N 64° 17' W - 48.38'
9. N 81° 28' W - 68.80'
10. N 52° 09' W - 62.16'
LOT 20
11. N 63° 23' W - 90.06'
12. N 50° 23' W - 118.44'
LOT 21
13. N 77° 00' W - 61.93'
14. N 55° 25' W - 145.39'
LOT 22
15. N 56° 15' W - 108.99'
16. N 49° 09' W - 101.93'
FROM LOT 22 TO LOT 24
17. N 53° 31' W - 113.45'
18. N 62° 23' W - 60.00'
LOT 24
19. N 62° 23' W - 40.16'
20. N 44° 04' W - 110.48'
21. N 0° 27' E - 71.75'
22. N 40° 50' E - 83.10'
23. N 67° 38' E - 182.59'
LOT 20
0.92 ACRE
LOT 21
0.82 ACRE
LOT 22
0.83 ACRE
LOT 19
0.65 ACRE
LOT 24
1.24 ACRES
LOT 26
SEA LEVEL CONTOUR DATUM) ELEV. 226.5
(U.S.G.S. FOLLOWS)
I PIPE
(NOT TO SCALE)
N 241,015.30
E 1,466,225.62
I PIN
LOT 1
0.78 ACRE
CARL A. HORTON
EXISTING ROAD R/W LIMIT
ROAD NO. 56
TO S.C. HWY. 97
S 89° 52' W - 98.82'
S 61° 40' W - 83.20'
S 72° 11' W - 35.84'
S 89° 05' W - 32.39'
S 80° 12' W - 42.00'
S 67° 57' W - 83.33'
S 81° 03' W - 38.47'
S 85° 21' W - 48.71'
N 85° 56' W - 77.32'
S 82° 52' W - 38.21'
S 69° 45' W - 47.44'
S 69° 25' W - 40.20'
N 86° 00' W - 24.74'
N 83° 30' W - 36.80'
S 75° 02' W - 28.64'
S 65° 20' W - 24.26'
S 65° 20' W - 47.05'
"I Hereby" Certify that the Ratio of Precision of the field survey is 1:10,000+ as shown and the Area was determined by D.M.D. method of Area Calculation.
Albert M. Lyerly
S.C., R.L.S. No. 2778
Duke Power Co.
Charlotte, NC
CRESCENT LAND & TIMBER CORP
LAKE WATEREE
MAP OF
RECREATION LOTS
SECTION 41
LOTS 1, 19-22 & 24
FLAT ROCK TOWNSHIP
KERSHAW COUNTY, S.C.
SCALE 1" = 100'
MISC. BOOK NO. 561
JANUARY 19, 1978
DWG. NO. L. WA. 41-A
SCALE IN FEET
NOTE: DUKE POWER COMPANY TO CRESCENT LAND & TIMBER CORP DEED BOOK H.W., PAGE 1493 DATED: MAY 1, 1969.
BUILDING SETBACK LINES ARE 10 FEET FROM ROAD RIGHT OF WAY LIMIT, 50 FEET FROM CONTOUR ELEV 226.5 U.S.G.S. SEA LEVEL DATUM, AND 10 FEET FROM SIDE LOT LINES.

Book: 36 Page Sequence: 222





DUK_00100439

Exhibit 33

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Clyde Marcus Jones, II, on behalf of himself and all others similarly situated,

Plaintiffs,

vs. Case No. 3:24-cv-01281-MGL

Duke Energy Corporation and Duke Energy Carolinas, LLC,

Defendants.

VIDEOTAPED TELECONFERENCE

DEPOSITION OF: JOHN MILTON DEAL, JR.

DATE: Wednesday, March 25, 2026

TIME: 9:31 a.m.

TIME ENDED: 11:16 a.m.

LOCATION: PARKER POE ADAMS & BERNSTEIN, LLP
1221 Main Street, Suite 1100
Columbia, South Carolina

REPORTED BY: YVONNE R. THURSTON-BOHANNON
Registered Merit Reporter,
Certified Realtime Reporter

A. Me, my brother-in-law and my father-in-law.
Q. Okay. And was the intent that it was being divided family-wise one-third apiece?
A. Correct.
Q. Is that the intent?
A. Yes.
Q. Okay. And had you ever owned any other properties on Lake Wateree?
A. Me personally, no.
Q. Okay.
A. I did grow up there. My family owned property, but not me personally.
Q. Where -- where did your family own property?
A. We owned at the time Deal's Marina. It is now Clearwater Cove. It was on Baron Dekalb Road. I -- I grew up there.
Q. Who in your family owned the Marina?
A. My mother and my father.
Q. Okay. And did they operate it together?
A. Yes. Yes.
Q. And how long did they own the marina?
A. Probably from 1958 to 1984, about 25

years.

Q. And then what year were you born?

A. 1961.

Q. And so you were in -- basically involved with Lake Wateree your whole life?

A. Oh, yes, sir.

Q. Did you grow up and work any at the Marina?

A. Yes.

Q. You had a lot of interesting jobs, right?

A. As soon as I was able to pick up dead fish, yes, sir --

Q. Okay.

A. -- I was working.

Q. All right. And how far is the Marina from the Sailing Club Road property?

A. I'd say by water by about three miles, something like that.

Q. How about by land?

A. By land probably eight or ten.

Q. Okay. When did your parents sell the marina?

A. 1984.

Q. Okay. So you said they owned it '58 to

lives in Charleston, South Carolina.

Q. And what do they do?

A. Margaret and her husband own three wine venues. They sell, distribute wine. And Emily works for a jewelry wholesaler, and she's their marketing person.

Q. And Margaret and Emily, have they shared with you that they have a lot of wonderful memories about the use and enjoyment of Lake Wateree --

A. Yes.

Q. -- through their --

MR. SHEHEEN: Object to form.

BY MR. DUNLAP:

Q. -- through their childhood?

A. Yes.

Q. And from time to time Austin may object, and that's just something that he's doing to preserve an objection for purposes of the court.

A. Okay.

Q. It doesn't impact anything you're doing.

A. Okay.

Q. He's not going to instruct you not to answer anything --

In terms of your family's use of the property, was it consistent throughout the time that you had an ownership interest that you would use it a lot during the summer?

A. Yes.

Q. And particularly the holidays in the summer?

A. Yes.

Q. What about off season holidays, did you use it a lot then?

A. Probably not as much, but some if it was nice weather, yeah.

Q. Okay.

A. Yes.

Q. So some in the fall you might go out, some in the spring you might go out --

A. Yes.

Q. -- is that fair?

A. Yes.

Q. Maybe not so much in the winter?

A. Correct. Yes.

Q. Okay. And during all those seasons your family was able to use and enjoy and have wonderful memories of the property and Lake Wateree; is that fair?

A. Yes.
Q. Okay. And in terms of the -- the other families, you've indicated that both of them were able to have the same level of enjoyment of the use and -- and enjoyment of the property the entire time that they also used the property; is that fair?
A. Yes.
Q. And so they -- identify each family and tell me if they used the property during -- seasonally about the same as you did.
A. Identify the families?
Q. Yes.
A. Like Mark's mother and father, yes. And my family and my -- my children, yes. And Marcus, II, and his family, yes.
Q. Okay. And you don't recall anyone throughout your ownership of the property ever saying that they regretted spending time out there, do you?
A. No.
Q. And in terms of the kind of activities that you would engage in with your family at the property -- we talked a little bit about your boating experience --

A. Uh-huh.
Q. -- and expertise --
A. Uh-huh.
Q. -- as a five-year-old boater --
A. Uh-huh.
Q. -- but let's -- let's talk now about experiences at the property. Did you ever fish at the property?
A. No.
Q. Okay. You're just not a fisherman?
A. No. No.
Q. And -- but you would have boated from the property?
A. Yes.
Q. And what kind of boat did you own?
A. We had a pontoon boat for a while, and we had a 20 foot Sea Ray for a while.
Q. Were these family boats that you all bought together or --
A. Yes. Uh-huh.
Q. Okay.
A. Yes.
Q. So the third of --
A. Yes.
Q. Okay. How long did you have a pontoon

boat?

A. We had the pontoon boat from when our children were born probably till they were nine or ten. So, you know, say, ten years. Then they wanted something faster.

Q. And then the Sea Ray about how long?

A. Probably another ten years. Till they went to college.

Q. And did you teach them how to water ski?

A. Oh, yes.

Q. Teach them how to tube?

A. Uh-huh. Yes.

Q. And non -- I'm guessing those were wonderful activities and memories for you and --

A. Yes.

Q. -- your family on -- on Lake Wateree?

A. Yes.

Q. And when you would pull up to the property, there's a dock --

A. Yes.

Q. -- there?

Would you -- you would dock there --

A. Yes.

Q. -- at that dock?

A. Uh-huh.
Q. Was there ever a boathouse?
A. No.
Q. Okay. And were there times that you and the other two family owners that you all would go out --
A. Yes.
Q. -- and boat?
A. Yes.
Q. And that would include the pontoon and the Sea Ray?
A. Yes.
Q. And that would include water skiing and tubing?
A. Yes.
Q. Any other boating activities with the other families?
A. Other than just riding, yes.
Q. And those are probably some of the best memories you have in your life --
A. Yes.
Q. -- when you were out on Lake Wateree using the boat and from the property that you owned the third of --
A. Yes.

Q. -- for all of those years --
A. Yes.
Q. -- is that fair?
A. Yes.
Q. And the same would be fair as to the other two families, they would use and enjoy it to the same extent you and your family did in terms of the boating activities, water skiing and tubing?
A. Yes, sir.
Q. Okay. What about using a paddle board, did you ever use a paddle board?
A. Me personally, no.
Q. Did anybody in the family?
A. Yes.
Q. Who would have enjoyed that?
A. My children and some of my -- some of Mark's family.
Q. Yes, sir.
And so the children were able to use and enjoy the paddle board, had wonderful memories of that; is that fair?
A. Yes.
Q. Okay. What -- what other type activities -- are there any other water activities?
A. We had some kayaks, just other

floatables, noodles, just general water stuff.

Q. Who in the family enjoyed the kayaking?

A. My wife would have and Mark's wife and -- and, again, the children.

Q. And all of them were able to use and enjoy the kayaking and would have wonderful memories of their times on Lake Wateree doing that --

A. Yeah.

Q. -- from the property?

A. Yes.

Q. And so when you go out to the dock area, if you try to wade into the water, is it a gradual drop or is it --

A. Gradual, yes.

Q. Okay. So they were able to just take the -- the kayak as an example or a paddle board and launch --

A. Sure.

Q. -- right there --

A. Yes.

Q. -- off of the ground?

A. Yes.

Q. Okay. Are there any other activities like grilling outdoors that you particularly

enjoyed?

A. We would grill, and we would come -- we call it cook a fire, which is a bon fire, so, yeah.

Q. Okay. Where would you put the bon fire? Down near the water?

A. On the beach, yes, sir.

Q. Okay. Who would build the bon fire?

A. Just me or Mark.

Q. And did you roast marshmallows out there?

A. Yes, sir.

Q. And I'm very confident the entire time they used and enjoyed roasting marshmallows and eating on the beach; is that fair?

A. Yes, sir.

Q. Did you ever do that at sunset?

A. Yes, sir.

Q. And those are probably lifelong memories for you and your family; is that fair?

A. Yes, sir.

Q. Okay. And the same would be true of the rest of your family and the other two families, they would have all used and enjoyed that, and you observed them using and enjoying it and developing those wonderful family memories; is that fair?

A. Yes.
Q. Any other boating activities you can think of?
A. That's about it.
Q. Okay. Did any of the families go out during the winter?
A. Occasionally we would bundle up and go out, but not often.
Q. Not often.
What about the other two families?
A. Probably the same. If -- if you're talk -- still talking about winter, no, sir.
Q. So probably two or three times in the winter --
A. Maybe.
Q. -- at most?
A. Uh-huh.
Q. Okay. And that was purely because of the weather?
A. Yes.
Q. Okay. Bear with me just a minute.
A. Sure.
Q. Do you own a boat today?
A. I do not.
Q. When did you sell your boat or your

interest in the boat?
A. I don't know. I don't remember.
Q. Within about the time you sold --
A. Yes.
Q. -- your interest in the property?
A. Sure.
Q. How about your use of the property since you sold, have you been out there any?
A. Yes.
Q. And you've done the same sort of activities; is that fair?
A. Yes.
Q. And you go out there with your family; is that fair?
A. Yes.
Q. And you've been out there with the other families?
A. Yes.
Q. Okay. And that would include Mark?
A. Yes.
Q. And is he the current owner of the -- one of the owners of the property?
A. Yes.
Q. And then I think he's a -- has a daughter who is a part owner?

A. Yes.
Q. Okay. Do you have any grandchildren?
A. Do I? No.
Q. Okay. Did you ever own a jet ski?
A. Not me personally, no.
Q. Somebody in the family, though?
A. Yes.
Q. Who is that?
A. Mark.
Q. And was Mark able to use and enjoy the jet ski throughout the time that he had it at the property?
A. Yes.
Q. And I'm sure he has wonderful memories of that as well --
A. I'm sure.
Q. -- is that true?
A. Yes.
Q. Where did he buy it?
A. I do not know.
Q. Okay. Does he still have it?
A. I would say no, but let's say I don't know.
Q. Did anyone in your family fish?
A. At the property? No.

Q. And that was just a choice because some people just don't care to fish; is that fair?
A. Yes. Yes.
Q. Fishing requires a lot of patience and --
A. And you're talking about my four immediate family members?
Q. Yes, sir.
A. Yeah, that is correct.
Q. Okay. Did you ever swim in the water?
A. Ever? Yes.
Q. As a child --
A. Yes.
Q. -- when you were growing up?
A. Yes.
Q. And at the property, the Sailing Club Road property, did the children that you have and the other children who were in the family, did they all use and enjoy swimming in the lake?
A. Yes.
Q. Anyone else, any of the adults enjoy swimming?
A. Yes.
Q. Who? Who?
A. All the adults. Everybody in the

family.

Q. Okay.

A. There's nobody that did not want to get in the water.

Q. Have you ever been a member of any Lake Wateree homeowners associations?

A. Yes.

Q. Tell me about that.

A. I don't remember the year, but the treasurer of that group was retiring and they needed a new treasurer, and that became my job. And I was treasurer for 20 years, and it was the Lake Wateree Association.

Q. And how often did that meet?

A. Once a month.

Q. Where would it meet?

A. We would meet at the back of First Community Bank for many years, and then we moved to one of the churches on the lake.

Q. Okay.

A. I don't remember the name of the church, but the bank sold and we just had to find somewhere else.

Q. Yes, sir.

Was there a sailing club and boating

A. Correct.
Q. -- with the II being Mark?
A. Correct.
Q. Okay. And so this was purchased on or around November 29th of 2001 from this gentleman William [sic] C. Copp for $114,900. Is that what it looks like?
A. Yes.
Q. Did you know Mr. Copp?
A. I do not.
Q. Did any in your -- anyone in your family know him?
A. As far as I know, no.
Q. Do you know if they still live in the area?
A. I do not.
Q. Did Mr. Copp ever mention to you or disclose any information containing the PCB impacts?
MR. SHEHEEN: Object to form.
THE WITNESS: No.
BY MR. DUNLAP:
Q. And so the three of you all bought the property together and divided it into thirds?
A. Correct.

deed for distribution. Do you see under -- it says, "In the Probate Court" on the right-hand side?

A. Uh-huh.

Q. It says, "Deed of Distribution"?

A. Yes.

Q. Do you see that?

A. Yes, sir.

Q. Okay. And so this is where the property was actually passed to Emily Jones, his wife; is that fair?

A. That's a fair assumption, yes.

Q. All right. Then we're going to go to the next exhibit which we're going to mark as Exhibit 3 which is Bates JONES 68.

(Deal Exhibit 3, Title to Real Estate, Bates Stamped JONES_000068 Through JONES_000071, marked for identification.)

BY MR. DUNLAP:

Q. Okay? And this document says, "Title to Real Estate." Do you see that?

A. Yes.

Q. And this indicates that John M. Deal, Jr., and Emily C. Jones sold their right and interest in the property to Clyde M. Jones, which

is Mark --
A. Yes.
Q. -- on June 3, 2020, for $46,000?
A. Yes.
Q. Is that what it says?
A. Yes, sir.
Q. And is that accurate?
A. Yes, sir.
Q. So on June the 3rd of 2020, you and Emily C. Jones sold the interest that you all had in the Sailing Club Road property; is that right?
A. Yes.
Q. And the price that Mark paid for it on June 3 of 2020, the grand total price was $46,000; is that accurate?
A. Yes.
Q. And were you satisfied with that price?
A. Yes.
Q. Was it a fair price?
A. Yes.
Q. Were there any negotiations leading up to the determination of that number?
A. Not that I recall.
Q. How was that number determined?
A. I think our accountant was involved and

THE WITNESS: I -- I just see the signs that Duke posts on the billboards.
BY MR. DUNLAP:
Q. Right.
And you've been aware of that for a long time, right?
A. Yes.
Q. And when Mark bought out your interest in 2020, he was aware there were PCB impacts at Lake Wateree; is that right?
MR. SHEHEEN: Object to form.
THE WITNESS: I do not know.
BY MR. DUNLAP:
Q. He was aware of the fish tissue study, right?
MR. SHEHEEN: Object to form.
THE WITNESS: I don't know.
BY MR. DUNLAP:
Q. Okay. And you're aware of it through the signs posted at Lake Wateree?
A. Yes.
Q. Have you ever -- have you ever read anything about the fish tissue study?
A. I would say yes.
Q. And would that have been about the time

Q. Bear with me just a minute.
A. Sure.
MR. SHEHEEN: We're actually about an hour. Do you mind if I take a quick break?
MR. DUNLAP: No problem.
MR. SHEHEEN: Thank you.
MR. DUNLAP: Go off the record.
THE VIDEOGRAPHER: We're going off record at 11:29 a.m. [sic].
(A recess transpired.)
THE VIDEOGRAPHER: We're back on the record at 10:42 a.m.
BY MR. DUNLAP:
Q. The existence or nonexistence of PCB impacts didn't have any influence at all in the determination of the $46,000 that was paid for the interest being acquired; is that --
A. No, I mean, that --
Q. That is accurate?
A. That is accurate.
MR. DUNLAP: Okay. Let's pull up the next exhibit on the screen. And this is going to be JONES Bates number 2.
(Deal Exhibit 4, Title to Real Estate, Bates Stamped JONES_000002, marked for

A. Just whenever it was rented.
Q. And when you say you would take the trash, you would haul it off --
A. Uh-huh.
Q. -- the trash off?
A. Uh-huh. Yes.
Q. Are you aware that the advertising encouragement was to use and enjoy the water?
A. Yes.
Q. And are you aware that there were references that the property provides kayaks and a paddle board?
A. Yes.
Q. Did anyone in the family ever discuss potential PCB impacts with renters or potential renters?
MR. SHEHEEN: Object to the form.
THE WITNESS: As far as I know, no.
BY MR. DUNLAP:
Q. Was fishing equipment made available to renters?
A. I don't know.
Q. If that was advertised in the VRBO records, that's not something you would dispute, is it?

Q. And no realtor, appraiser or other real estate professional has ever told you that it would be difficult to sell this property?

A. No.

MR. SHEHEEN: Object to form.

MR. DUNLAP: Let's take a break. I think I'm close.

THE VIDEOGRAPHER: We're off the record at 11:16 a.m. This is the end of media one.

(A recess transpired.)

THE VIDEOGRAPHER: We're back on the record at 11:28 a.m. This is the beginning of media two.

BY MR. DUNLAP:

Q. You and your family and the other families that had an ownership interest in the Sailing Club property have used and enjoyed the property as much after you sold your interest as before --

A. Yes.

Q. -- is that fair?

And like on most lakes around the holidays you've indicated that your usage of it was very reliable?

A. Yes.

Q. Is that a fair way --
A. Yes.
Q. -- to describe it?
A. Yes.
Q. You wanted to be there, right?
A. Yes.
Q. And your -- your -- the rest of your family, your personal family and your extended family wanted to be there?
A. Right. Yes.
Q. And so -- and on the holidays like the July 4th fireworks display, there would be thousands of people out on the lake enjoying Lake Wateree; is that fair?
A. Yes.
Q. And on Memorial Day there would be thousands of people out on Lake Wateree enjoying the holiday --
A. Yes.
Q. -- is that right?
A. Yes.
Q. And on Labor Day there would be thousands of people out on the water enjoying Lake Wateree; is that fair?
A. Yes. Yes.

Q. And you would have seen water skiing, tubing, fishing, all those kinds of activities?
A. Yes.
Q. You would have seen swimming?
A. Yes.
Q. And you would have seen maybe some other activities that were people just having a good time enjoying the families in the water --
A. Yes.
Q. -- is that fair?
And that's been true from really from your very early childhood through today --
A. Yes.
Q. -- you've noticed this over the years?
A. Yes.
Q. Okay.
MR. DUNLAP: At this time I don't have any further questions. I just want to mention my ask --
THE WITNESS: Okay.
MR. DUNLAP: -- that you could look and see if you have any appraisals --
THE WITNESS: Okay.
MR. DUNLAP: -- and -- and if so, if you can provide them to Austin --

CERTIFICATE OF REPORTER

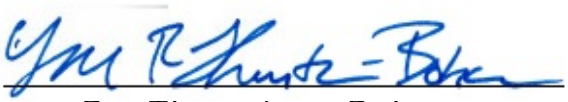
I, Yvonne R. Thurston-Bohannon, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public for the State of South Carolina at Large, do hereby certify:

That the reading and signing of the foregoing deposition by the witness is waived.

That the foregoing transcript was taken before me on the date and at the time and location stated on page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal March 31, 2026, at Columbia, Richland County, South Carolina.



Yvonne R. Thurston-Bohannon
Registered Merit
Reporter, CRR
My Commission expires
May 14, 2035

Exhibit 34

FIRST PALMETTO
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EQUAL HOUSING LENDER

Certificate of Appraiser Independence

Inspection date: 14 April, 2020
Order # : xxxxx5035
Borrower name: Clyde Marcus Jones II
Property Address: 1778 Sailing Club Road
Camden, SC 29020

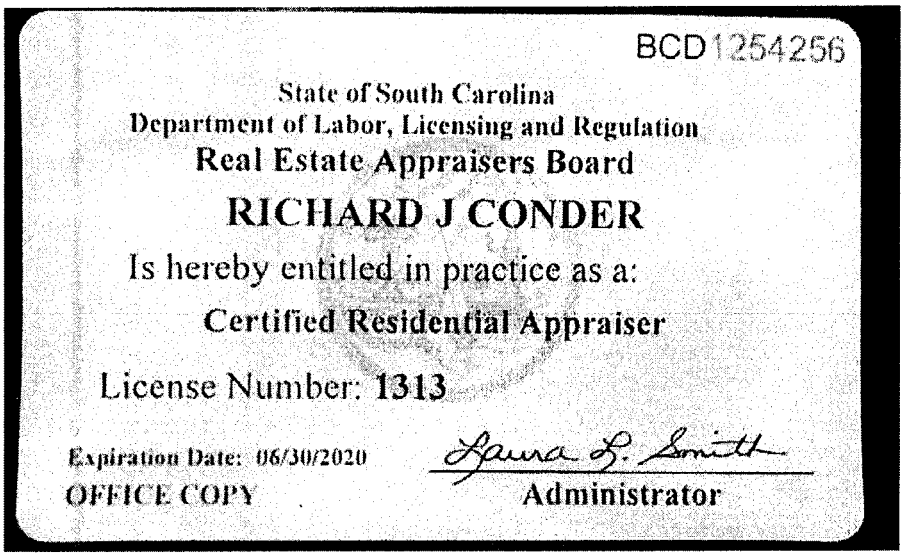
First Palmetto Bank certifies that the above referenced appraisal has been completed in compliance with all current appraisal independence requirements as defined by the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Interagency Appraisal and Evaluation Guidelines, Fannie Mae, Freddie Mac and the Federal Housing Administration, in strict adherence to our non-influence policy and process:

- No employee, director, officer or agent of the lender or any other third party acting as joint venture partner, independent contractor, appraisal company, appraisal management company or partner on behalf of the lender, has influenced or attempted to influence the development, reporting, result, or review of the appraisal in any manner.
- The Lender/Client named on the appraisal report submitted the appraisal order through a secure self-managed appraisal software platform, or through approved and compliant 3rd party integration.
- Appraiser selection was performed by a non-compensated member of First Palmetto Bank. Appraiser selection was performed utilizing a selection methodology of management-approved policies based on the location of the subject property, appraiser availability and historical quality and performance metrics.
- The appraiser's compensation was not in any way dependent on the value arrived at or the closing of the loan. The appraiser was compensated directly by the First Palmetto Bank and not by a First Palmetto Bank staff member that receives compensation based on loan sales.
- The terms and conditions of the engagement contract between the First Palmetto Bank and the appraiser prohibit the appraiser from inappropriate communication with First Palmetto Bank origination staff or attempting to obtain value/loan information from the borrower/property owner.
- No estimate regarding the Subject Property's value, proposed loan amount or proposed loan-to-value ratio was provided or communicated by First Palmetto Bank to the appraiser.
- For all transactions: By proper use of a secure self-managed appraisal software platform, First Palmetto Bank'S loan production staff is unaware of the identity of the appraiser until the final appraisal report is delivered. Likewise the appraiser is provided with only the First Palmetto Bank's company name and address for inclusion in the appraisal report and is never provided with the identity or contact information of the originator of the loan. For purchase transactions, the purchase agreement was provided to the appraiser as required by USPAP Standards Rule 1-5(a).
- All communication between the selected appraiser and First Palmetto Bank was conducted through First Palmetto Bank's Appraisal Department. First Palmetto Bank is unaware of any communication to the appraiser for this appraisal assignment made by anyone that is in violation of the terms of current Appraiser Independence Requirements.

Corporate Address:
First Palmetto Bank
407 Dekalb Street
Camden, SC 29020-4437

Photograph Addendum

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



BCD1254256

State of South Carolina
Department of Labor, Licensing and Regulation
Real Estate Appraisers Board

RICHARD J CONDER

Is hereby entitled in practice as a:

Certified Residential Appraiser

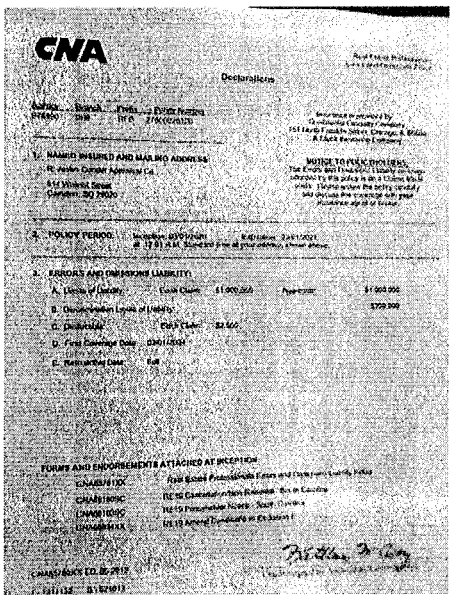
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Expiration Date: 06/30/2020

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Laura L. Smith
Administrator

License



CNA

Declarations

E&O

Uniform Residential Appraisal Report

File # 2000084 2000084

The purpose of this summary appraisal report is to provide the lender/client with an accurate, and adequately supported, opinion of the market value of the subject property.

SUBJECT

Property Address 1778 Sailing Club Rd | City Camden | State SC | Zip Code 29020
Borrower Clyde Marcus Jones, II | Owner of Public Record J M Deal, Jr | County Kershaw
Legal Description Deed Book 3485, pg-17; Plat Book 1083, pg-317
Assessor's Parcel # 128-04-41-040 | Tax Year 2019 | R.E. Taxes $ 5,525
Neighborhood Name Lake Wateree | Map Reference 17900 | Census Tract 9703.00
Occupant [X] Owner [ ] Tenant [ ] Vacant | Special Assessments $ 0 | [ ] PUD | HOA $ 0 [ ] per year [ ] per month
Property Rights Appraised [X] Fee Simple [ ] Leasehold | Other (describe)
Assignment Type [ ] Purchase Transaction [X] Refinance Transaction [ ] Other (describe)
Lender/Client First Palmetto Bank | Address 1105 Broad St, Camden, SC 29020
Is the subject property currently offered for sale or has it been offered for sale in the twelve months prior to the effective date of this appraisal? [X] Yes [ ] No
Report data source(s) used, offering price(s), and date(s). DOM 105;Subject is listed on CMLS#485818 for $499,000. Subject has been on the market for 105 days.

CONTRACT

I [ ] did [ ] did not analyze the contract for sale for the subject purchase transaction. Explain the results of the analysis of the contract for sale or why the analysis was not performed.

Contract Price $ | Date of Contract | Is the property seller the owner of public record? [ ] Yes [ ] No | Data Source(s)
Is there any financial assistance (loan charges, sale concessions, gift or downpayment assistance, etc.) to be paid by any party on behalf of the borrower? [ ] Yes [ ] No
If Yes, report the total dollar amount and describe the items to be paid.

NEIGHBORHOOD

Note: Race and the racial composition of the neighborhood are not appraisal factors.

Neighborhood Characteristics				One-Unit Housing Trends				One-Unit Housing			Present Land Use %	
Location	[ ] Urban	[ ] Suburban	[X] Rural	Property Values	[ ] Increasing	[X] Stable	[ ] Declining	PRICE	AGE		One-Unit	70 %
Built-Up	[ ] Over 75%	[X] 25-75%	[ ] Under 25%	Demand/Supply	[ ] Shortage	[X] In Balance	[ ] Over Supply	$ (000)	(yrs)		2-4 Unit	%
Growth	[ ] Rapid	[X] Stable	[ ] Slow	Marketing Time	[ ] Under 3 mths	[X] 3-6 mths	[ ] Over 6 mths	100	Low	0	Multi-Family	%
								900	High	60	Commercial	2 %
								425	Pred.	15	Other	28 %

Neighborhood Boundaries Generally Bound area along the waterfront properties of Lake Wateree and bound north by Hwy 97, south by River Rd, east by Hwy 601 and west by I-77.

Neighborhood Description Has Access to Kershaw County schools, churches and shopping. Lake Wateree is gradually becoming a year round community with custom homes being built as well as the upgrade of existing homes. Demand has been stable over the last year and foreclosures are limited. Values appear to be stable over the last year.

Market Conditions (including support for the above conclusions) Economic conditions and employment are stable. There is a stable market in Kershaw County for refinancing and new construction is stable. Conventional mortgage funding is adequate and rates are under 4%. The market has been stable over the last year, but the COVID-19 outbreak has made recent demand slow in the last few weeks.

SITE

Dimensions According to GIS Maps | Area 42689 sf | Shape Mostly Rectangular | View B;Wtr;
Specific Zoning Classification R-15 | Zoning Description Residential
Zoning Compliance [X] Legal [ ] Legal Nonconforming (Grandfathered Use) [ ] No Zoning [ ] Illegal (describe)
Is the highest and best use of subject property as improved (or as proposed per plans and specifications) the present use? [X] Yes [ ] No If No, describe

Utilities	Public	Other (describe)		Public	Other (describe)	Off-site Improvements - Type	Public	Private
Electricity	[X]	[ ]	Water	[X]	[ ]	Street Asphalt	[X]	[ ]
Gas	[ ]	[X] Bottle	Sanitary Sewer	[ ]	[X] Septic	Alley None		

FEMA Special Flood Hazard Area [ ] Yes [X] No | FEMA Flood Zone X | FEMA Map # 45055C0170F | FEMA Map Date 09/28/2018
Are the utilities and off-site improvements typical for the market area? [X] Yes [ ] No If No, describe
Are there any adverse site conditions or external factors (easements, encroachments, environmental conditions, land uses, etc.)? [ ] Yes [X] No If Yes, describe
There were no adverse easements or encroachments observed during visual inspection. However, a title search is always recommended. Septic tank appeared to be working with no foul odor or green spots noticed in the yard. Subject home appears to be located above in the flood zone according to GIS flood maps. The lot is in the flood area below the house. Subject shares a drive with the lot on the left side facing the lake.

IMPROVEMENTS

General Description		Foundation		Exterior Description	materials/condition	Interior	materials/condition
Units	[X] One [ ] One with Accessory Unit	[ ] Concrete Slab	[X] Crawl Space	Foundation Walls	Post/Good	Floors	Hdwd/Cpt/Gd
# of Stories	1.5	[ ] Full Basement	[ ] Partial Basement	Exterior Walls	Vinyl Siding/Good	Walls	Drywall/Good
Type	[X] Det. [ ] Att. [ ] S-Det./End Unit	Basement Area	0 sq.ft.	Roof Surface	Architectural/Good	Trim/Finish	Average+/Wood
	[X] Existing [ ] Proposed [ ] Under Const.	Basement Finish	0 %	Gutters & Downspouts	As needed/Gd	Bath Floor	Vinyl/Good
Design (Style)	Trad	[ ] Outside Entry/Exit	[ ] Sump Pump	Window Type	Vinyl DHung/Good	Bath Wainscot	Enamel Paint/Good
Year Built	2003	Evidence of	[ ] Infestation None Obser	Storm Sash/Insulated	Insulated/Good	Car Storage	[ ] None
Effective Age (Yrs)	8	[ ] Dampness	[ ] Settlement	Screens	Yes/Good	[X] Driveway	# of Cars 3
Attic	[ ] None	Heating	[X] FWA [ ] HWBB [ ] Radiant	Amenities	Woodstove(s) # 0	Driveway Surface	Gravel
[ ] Drop Stair	[ ] Stairs	[ ] Other	Fuel Electric	[ ] Fireplace(s) # 0	[ ] Fence None	[ ] Garage	# of Cars 0
[ ] Floor	[X] Scuttle	Cooling	[X] Central Air Conditioning	[ ] Patio/Deck None	[X] Porch CPO	[X] Carport	# of Cars 2
[ ] Finished	[ ] Heated	[ ] Individual	[ ] Other	[ ] Pool None	[X] Other Stg Room	[ ] Att.	[ ] Det. [X] Built-in

Appliances [X] Refrigerator [X] Range/Oven [X] Dishwasher [X] Disposal [X] Microwave [ ] Washer/Dryer [ ] Other (describe)
Finished area above grade contains: 6 Rooms | 4 Bedrooms | 3.0 Bath(s) | 2,171 Square Feet of Gross Living Area Above Grade
Additional features (special energy efficient items, etc.). Subject has a nice lot with a beach area, dock, good view and parking area near the home. There is a large covered porch, hdwd floors in the living areas down and a large room up that makes a good rec room or place for the kids to stay with a full bath.
Describe the condition of the property (including needed repairs, deterioration, renovations, remodeling, etc.). C3;Kitchen-updated-less than one year ago;Bathrooms-updated-less than one year ago;Subject has not had any major updates due to the home being well maintained, but the interior was painted in the last two months.

Are there any physical deficiencies or adverse conditions that affect the livability, soundness, or structural integrity of the property? [ ] Yes [X] No If Yes, describe

Does the property generally conform to the neighborhood (functional utility, style, condition, use, construction, etc.)? [X] Yes [ ] No If No, describe

Form 1004UAD - "TOTAL" appraisal software by a la mode, inc. - 1-800-ALAMODE

Uniform Residential Appraisal Report

File # 2000084 2000084

There are 6 comparable properties currently offered for sale in the subject neighborhood ranging in price from $ 425,000 to $ 499,900

There are 4 comparable sales in the subject neighborhood within the past twelve months ranging in sale price from $ 410,000 to $ 481,570

SALES COMPARISON APPROACH

FEATURE	SUBJECT	COMPARABLE SALE # 1		COMPARABLE SALE # 2		COMPARABLE SALE # 3	
Address	1778 Sailing Club Rd Camden, SC 29020	2005 Lakeshore Rd Camden, SC 29020		2169 Lakeshore Rd Camden, SC 29020		35 Retreat Ln Liberty Hill, SC 29074	
Proximity to Subject		1.95 miles SE		1.85 miles SE		2.01 miles NW	
Sale Price	$		$ 452,000		$ 462,000		$ 481,570
Sale Price/Gross Liv. Area	$ 178.83 sq.ft.	$ 234.20 sq.ft.		$ 222.01 sq.ft.		$ 215.18 sq.ft.	
Data Source(s)		CMLS#475908;DOM 237		CMLS#480960;DOM 1		CMLS#486854;DOM 6	
Verification Source(s)		Tax Records/Driveby		Tax Records/Driveby		Tax Records/Driveby/MLS	
VALUE ADJUSTMENTS	DESCRIPTION	DESCRIPTION	+(-) $ Adjustment	DESCRIPTION	+(-) $ Adjustment	DESCRIPTION	+(-) $ Adjustment
Sales or Financing		ArmLth		ArmLth		ArmLth	
Concessions		VA;0		Conv;0		Conv;0	
Date of Sale/Time		s04/20;c03/20		s10/19;c10/19		s03/20;c01/20	
Location	N;WtrFr;	N;WtrFr;		N;WtrFr;		N;WtrFr;	
Leasehold/Fee Simple	Fee Simple	Fee Simple		Fee Simple		Fee Simple	
Site	42689 sf	30,928 sf	0	27007 sf	0	40075 sf	0
View	B;Wtr;	N;Wtr;	+10,000	N;Wtr;	+10,000	B;Wtr;	
Design (Style)	DT1.5;Trad	DT1.5;Trad		DT1.5;Trad		DT1.5;Trad	
Quality of Construction	Q3	Q3	-5,000	Q3	-5,000	Q3	-5,000
Actual Age	17	12	0	20	0	13	0
Condition	C3	C3		C3		C3	
Above Grade Room Count (Total / Bdrms. / Baths)	6 / 4 / 3.0	8 / 3 / 2.1	+1,000	6 / 3 / 2.1	+1,000	8 / 4 / 3.1	-2,500
Gross Living Area	2,171 sq.ft.	1,930 sq.ft.	+12,050	2,081 sq.ft.	+4,500	2,238 sq.ft.	-3,350
Basement & Finished	0sf	0sf		0sf		0sf	
Rooms Below Grade							
Functional Utility	Average	Average		Average		Average	
Heating/Cooling	Htpump/CAC	Htpump/CAC		Htpump/CAC		FWA/AC	0
Energy Efficient Items	Insul Windows	Insul Windows		Insul Windows		Insul Windows	
Garage/Carport	2cp3dw	2ga3dw	-5,000	2ga2dw	-5,000	2cp3dw	
Porch/Patio/Deck	CPO	CPOs	0	CPO/Decks/Scrn	-3,000	Scrn Pch/Deck	-2,000
Other	Dock	Dock/Ramp	-5,000	Dock/Stg/Ramp	-5,000	Dock/Fp	-2,000
Exterior	Vinyl	HardiPlank	0	HardiPlank	0	Vinyl	
Net Adjustment (Total)		X + -	$ 8,050	+ X -	$ -2,500	+ X -	$ -14,850
Adjusted Sale Price of Comparables		Net Adj. 1.8 % Gross Adj. 8.4 %	$ 460,050	Net Adj. 0.5 % Gross Adj. 7.3 %	$ 459,500	Net Adj. 3.1 % Gross Adj. 3.1 %	$ 466,720

I X did did not research the sale or transfer history of the subject property and comparable sales. If not, explain

My research did X did not reveal any prior sales or transfers of the subject property for the three years prior to the effective date of this appraisal.

Data Source(s) Public Record

My research did X did not reveal any prior sales or transfers of the comparable sales for the year prior to the date of sale of the comparable sale.

Data Source(s) Public Record

Report the results of the research and analysis of the prior sale or transfer history of the subject property and comparable sales (report additional prior sales on page 3).

ITEM	SUBJECT	COMPARABLE SALE #1	COMPARABLE SALE #2	COMPARABLE SALE #3
Date of Prior Sale/Transfer				
Price of Prior Sale/Transfer				
Data Source(s)	Tax Assessor	Tax Assessor	Tax Assessor	Tax Assessor
Effective Date of Data Source(s)	04/15/2020	04/15/2020	04/15/2020	04/15/2020

Analysis of prior sale or transfer history of the subject property and comparable sales None of the Comparable sales have sold in the last year prior to their sale date. The subject has not sold in the last three years.

Summary of Sales Comparison Approach After searching records, the appraiser feels these are the best available sales. Subject is a nice lake home with good quality and condition for this type home. There were limited sales like the subject. Sales 1 and 2 had slightly less view of the big water so an adjustment was made. Subject had formica tops and all sales had granite so an adjustment was made under quality. Sale 3 had the most similar view. All sales were considered in the final estimate of value. Due to the COVId-19 conditions, the estimated value was on the lower side of these sales.

Indicated Value by Sales Comparison Approach $ 460,000

RECONCILIATION

Indicated Value by: Sales Comparison Approach $ 460,000 Cost Approach (If developed) $ Income Approach (If developed) $

Most weight was given to the Sales Comparison Approach in the final value because it is the most accurate indicator for residential property. The Cost Approach would be an unreliable approach due to the age. The Income Approach is not applicable due to the area being mostly owner occupied.

This appraisal is made X 'as is', subject to completion per plans and specifications on the basis of a hypothetical condition that the improvements have been completed, subject to the following repairs or alterations on the basis of a hypothetical condition that the repairs or alterations have been completed, or subject to the following required inspection based on the extraordinary assumption that the condition or deficiency does not require alteration or repair: The property is appraised under the extraordinary assumption the home has no termite, electrical, mold, water, HVAC or structural problems.

Based on a complete visual inspection of the interior and exterior areas of the subject property, defined scope of work, statement of assumptions and limiting conditions, and appraiser's certification, my (our) opinion of the market value, as defined, of the real property that is the subject of this report is $ 460,000, as of 04/14/2020, which is the date of inspection and the effective date of this appraisal.

Uniform Residential Appraisal Report

File # 2000084 2000084

ADDITIONAL COMMENTS

I certify, as the appraiser, that I have completed all aspects of this valuation, including reconciling my opinion of value, free of influence from the client, client's representatives, borrower, or any other party to the transaction.

The typical exposure time for similar homes in this area was 1 - 10 months. The definition of exposure time used was taken from the Definitions section of the 2018-2019 version of USPAP.

Appraisals are no guarantee that the property is free from defects. The appraisal only establishes the value of the property for mortgage insurance purposes. Owners need to secure their own home inspections through the services of a qualified inspector and satisfy themselves about the condition of the property when construction is completed. The intended user of this report is the lender/client for loan purposes.

I have performed no services, as an appraiser or in any other capacity, regarding the property that is the subject of this report within the three-year period immediately preceding acceptance of this assignment.

The highest and best use of the subject property is a residential home.

There is not enough data available at this time to indicate the market has changed in the last few weeks, but the COVID-19 virus gives concern that the short term market could be impacted with slowing demand. Interest rates continue to be low which should help the market.

COST APPROACH

COST APPROACH TO VALUE (not required by Fannie Mae)

Provide adequate information for the lender/client to replicate the below cost figures and calculations.

Support for the opinion of site value (summary of comparable land sales or other methods for estimating site value) Subject site value was based on lot sales on the lake.

ESTIMATED [ ] REPRODUCTION OR [ ] REPLACEMENT COST NEW

Source of cost data

Quality rating from cost service Effective date of cost data

Comments on Cost Approach (gross living area calculations, depreciation, etc.)

Cost approach was not done due to the subject's age and current market conditions.

OPINION OF SITE VALUE			=$ 165,000
DWELLING	1,632	Sq.Ft. @ $	=$
		Sq.Ft. @ $	=$
			=$
Garage/Carport		Sq.Ft. @ $	=$
Total Estimate of Cost-New			=$
Less Physical	Functional	External	
Depreciation			=$( )
Depreciated Cost of Improvements			=$
"As-is" Value of Site Improvements			=$
Estimated Remaining Economic Life (HUD and VA only)	57 Years	INDICATED VALUE BY COST APPROACH	=$

INCOME

INCOME APPROACH TO VALUE (not required by Fannie Mae)

Estimated Monthly Market Rent $ X Gross Rent Multiplier = $ Indicated Value by Income Approach

Summary of Income Approach (including support for market rent and GRM)

PUD INFORMATION

PROJECT INFORMATION FOR PUDs (if applicable)

Is the developer/builder in control of the Homeowners' Association (HOA)? [ ] Yes [ ] No Unit type(s) [ ] Detached [ ] Attached

Provide the following information for PUDs ONLY if the developer/builder is in control of the HOA and the subject property is an attached dwelling unit.

Legal Name of Project

Total number of phases Total number of units Total number of units sold

Total number of units rented Total number of units for sale Data source(s)

Was the project created by the conversion of existing building(s) into a PUD? [ ] Yes [ ] No If Yes, date of conversion.

Does the project contain any multi-dwelling units? Yes No Data Source

Are the units, common elements, and recreation facilities complete? [ ] Yes [ ] No If No, describe the status of completion.

Are the common elements leased to or by the Homeowners' Association? [ ] Yes [ ] No If Yes, describe the rental terms and options.

Describe common elements and recreational facilities.

This report form is designed to report an appraisal of a one-unit property or a one-unit property with an accessory unit; including a unit in a planned unit development (PUD). This report form is not designed to report an appraisal of a manufactured home or a unit in a condominium or cooperative project.

This appraisal report is subject to the following scope of work, intended use, intended user, definition of market value, statement of assumptions and limiting conditions, and certifications. Modifications, additions, or deletions to the intended use, intended user, definition of market value, or assumptions and limiting conditions are not permitted. The appraiser may expand the scope of work to include any additional research or analysis necessary based on the complexity of this appraisal assignment. Modifications or deletions to the certifications are also not permitted. However, additional certifications that do not constitute material alterations to this appraisal report, such as those required by law or those related to the appraiser's continuing education or membership in an appraisal organization, are permitted.

SCOPE OF WORK: The scope of work for this appraisal is defined by the complexity of this appraisal assignment and the reporting requirements of this appraisal report form, including the following definition of market value, statement of assumptions and limiting conditions, and certifications. The appraiser must, at a minimum: (1) perform a complete visual inspection of the interior and exterior areas of the subject property, (2) inspect the neighborhood, (3) inspect each of the comparable sales from at least the street, (4) research, verify, and analyze data from reliable public and/or private sources, and (5) report his or her analysis, opinions, and conclusions in this appraisal report.

INTENDED USE: The intended use of this appraisal report is for the lender/client to evaluate the property that is the subject of this appraisal for a mortgage finance transaction.

INTENDED USER: The intended user of this appraisal report is the lender/client.

DEFINITION OF MARKET VALUE: The most probable price which a property should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and seller, each acting prudently, knowledgeably and assuming the price is not affected by undue stimulus. Implicit in this definition is the consummation of a sale as of a specified date and the passing of title from seller to buyer under conditions whereby: (1) buyer and seller are typically motivated; (2) both parties are well informed or well advised, and each acting in what he or she considers his or her own best interest; (3) a reasonable time is allowed for exposure in the open market; (4) payment is made in terms of cash in U. S. dollars or in terms of financial arrangements comparable thereto; and (5) the price represents the normal consideration for the property sold unaffected by special or creative financing or sales concessions* granted by anyone associated with the sale.

*Adjustments to the comparables must be made for special or creative financing or sales concessions. No adjustments are necessary for those costs which are normally paid by sellers as a result of tradition or law in a market area; these costs are readily identifiable since the seller pays these costs in virtually all sales transactions. Special or creative financing adjustments can be made to the comparable property by comparisons to financing terms offered by a third party institutional lender that is not already involved in the property or transaction. Any adjustment should not be calculated on a mechanical dollar for dollar cost of the financing or concession but the dollar amount of any adjustment should approximate the market's reaction to the financing or concessions based on the appraiser's judgment.

STATEMENT OF ASSUMPTIONS AND LIMITING CONDITIONS: The appraiser's certification in this report is subject to the following assumptions and limiting conditions:

1. The appraiser will not be responsible for matters of a legal nature that affect either the property being appraised or the title to it, except for information that he or she became aware of during the research involved in performing this appraisal. The appraiser assumes that the title is good and marketable and will not render any opinions about the title.

2. The appraiser has provided a sketch in this appraisal report to show the approximate dimensions of the improvements. The sketch is included only to assist the reader in visualizing the property and understanding the appraiser's determination of its size.

3. The appraiser has examined the available flood maps that are provided by the Federal Emergency Management Agency (or other data sources) and has noted in this appraisal report whether any portion of the subject site is located in an identified Special Flood Hazard Area. Because the appraiser is not a surveyor, he or she makes no guarantees, express or implied, regarding this determination.

4. The appraiser will not give testimony or appear in court because he or she made an appraisal of the property in question, unless specific arrangements to do so have been made beforehand, or as otherwise required by law.

5. The appraiser has noted in this appraisal report any adverse conditions (such as needed repairs, deterioration, the presence of hazardous wastes, toxic substances, etc.) observed during the inspection of the subject property or that he or she became aware of during the research involved in performing the appraisal. Unless otherwise stated in this appraisal report, the appraiser has no knowledge of any hidden or unapparent physical deficiencies or adverse conditions of the property (such as, but not limited to, needed repairs, deterioration, the presence of hazardous wastes, toxic substances, adverse environmental conditions, etc.) that would make the property less valuable, and has assumed that there are no such conditions and makes no guarantees or warranties, express or implied. The appraiser will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because the appraiser is not an expert in the field of environmental hazards, this appraisal report must not be considered as an environmental assessment of the property.

6. The appraiser has based his or her appraisal report and valuation conclusion for an appraisal that is subject to satisfactory completion, repairs, or alterations on the assumption that the completion, repairs, or alterations of the subject property will be performed in a professional manner.

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APPRAISER'S CERTIFICATION: The Appraiser certifies and agrees that:

1. I have, at a minimum, developed and reported this appraisal in accordance with the scope of work requirements stated in this appraisal report.

2. I performed a complete visual inspection of the interior and exterior areas of the subject property. I reported the condition of the improvements in factual, specific terms. I identified and reported the physical deficiencies that could affect the livability, soundness, or structural integrity of the property.

3. I performed this appraisal in accordance with the requirements of the Uniform Standards of Professional Appraisal Practice that were adopted and promulgated by the Appraisal Standards Board of The Appraisal Foundation and that were in place at the time this appraisal report was prepared.

4. I developed my opinion of the market value of the real property that is the subject of this report based on the sales comparison approach to value. I have adequate comparable market data to develop a reliable sales comparison approach for this appraisal assignment. I further certify that I considered the cost and income approaches to value but did not develop them, unless otherwise indicated in this report.

5. I researched, verified, analyzed, and reported on any current agreement for sale for the subject property, any offering for sale of the subject property in the twelve months prior to the effective date of this appraisal, and the prior sales of the subject property for a minimum of three years prior to the effective date of this appraisal, unless otherwise indicated in this report.

6. I researched, verified, analyzed, and reported on the prior sales of the comparable sales for a minimum of one year prior to the date of sale of the comparable sale, unless otherwise indicated in this report.

7. I selected and used comparable sales that are locationally, physically, and functionally the most similar to the subject property.

8. I have not used comparable sales that were the result of combining a land sale with the contract purchase price of a home that has been built or will be built on the land.

9. I have reported adjustments to the comparable sales that reflect the market's reaction to the differences between the subject property and the comparable sales.

10. I verified, from a disinterested source, all information in this report that was provided by parties who have a financial interest in the sale or financing of the subject property.

11. I have knowledge and experience in appraising this type of property in this market area.

12. I am aware of, and have access to, the necessary and appropriate public and private data sources, such as multiple listing services, tax assessment records, public land records and other such data sources for the area in which the property is located.

13. I obtained the information, estimates, and opinions furnished by other parties and expressed in this appraisal report from reliable sources that I believe to be true and correct.

14. I have taken into consideration the factors that have an impact on value with respect to the subject neighborhood, subject property, and the proximity of the subject property to adverse influences in the development of my opinion of market value. I have noted in this appraisal report any adverse conditions (such as, but not limited to, needed repairs, deterioration, the presence of hazardous wastes, toxic substances, adverse environmental conditions, etc.) observed during the inspection of the subject property or that I became aware of during the research involved in performing this appraisal. I have considered these adverse conditions in my analysis of the property value, and have reported on the effect of the conditions on the value and marketability of the subject property.

15. I have not knowingly withheld any significant information from this appraisal report and, to the best of my knowledge, all statements and information in this appraisal report are true and correct.

16. I stated in this appraisal report my own personal, unbiased, and professional analysis, opinions, and conclusions, which are subject only to the assumptions and limiting conditions in this appraisal report.

17. I have no present or prospective interest in the property that is the subject of this report, and I have no present or prospective personal interest or bias with respect to the participants in the transaction. I did not base, either partially or completely, my analysis and/or opinion of market value in this appraisal report on the race, color, religion, sex, age, marital status, handicap, familial status, or national origin of either the prospective owners or occupants of the subject property or of the present owners or occupants of the properties in the vicinity of the subject property or on any other basis prohibited by law.

18. My employment and/or compensation for performing this appraisal or any future or anticipated appraisals was not conditioned on any agreement or understanding, written or otherwise, that I would report (or present analysis supporting) a predetermined specific value, a predetermined minimum value, a range or direction in value, a value that favors the cause of any party, or the attainment of a specific result or occurrence of a specific subsequent event (such as approval of a pending mortgage loan application).

19. I personally prepared all conclusions and opinions about the real estate that were set forth in this appraisal report. If I relied on significant real property appraisal assistance from any individual or individuals in the performance of this appraisal or the preparation of this appraisal report, I have named such individual(s) and disclosed the specific tasks performed in this appraisal report. I certify that any individual so named is qualified to perform the tasks. I have not authorized anyone to make a change to any item in this appraisal report; therefore, any change made to this appraisal is unauthorized and I will take no responsibility for it.

20. I identified the lender/client in this appraisal report who is the individual, organization, or agent for the organization that ordered and will receive this appraisal report.

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21. The lender/client may disclose or distribute this appraisal report to: the borrower; another lender at the request of the borrower; the mortgagee or its successors and assigns; mortgage insurers; government sponsored enterprises; other secondary market participants; data collection or reporting services; professional appraisal organizations; any department, agency, or instrumentality of the United States; and any state, the District of Columbia, or other jurisdictions; without having to obtain the appraiser's or supervisory appraiser's (if applicable) consent. Such consent must be obtained before this appraisal report may be disclosed or distributed to any other party (including, but not limited to, the public through advertising, public relations, news, sales, or other media).

22. I am aware that any disclosure or distribution of this appraisal report by me or the lender/client may be subject to certain laws and regulations. Further, I am also subject to the provisions of the Uniform Standards of Professional Appraisal Practice that pertain to disclosure or distribution by me.

23. The borrower, another lender at the request of the borrower, the mortgagee or its successors and assigns, mortgage insurers, government sponsored enterprises, and other secondary market participants may rely on this appraisal report as part of any mortgage finance transaction that involves any one or more of these parties.

24. If this appraisal report was transmitted as an "electronic record" containing my "electronic signature," as those terms are defined in applicable federal and/or state laws (excluding audio and video recordings), or a facsimile transmission of this appraisal report containing a copy or representation of my signature, the appraisal report shall be as effective, enforceable and valid as if a paper version of this appraisal report were delivered containing my original hand written signature.

25. Any intentional or negligent misrepresentation(s) contained in this appraisal report may result in civil liability and/or criminal penalties including, but not limited to, fine or imprisonment or both under the provisions of Title 18, United States Code, Section 1001, et seq., or similar state laws.

SUPERVISORY APPRAISER'S CERTIFICATION: The Supervisory Appraiser certifies and agrees that:

1. I directly supervised the appraiser for this appraisal assignment, have read the appraisal report, and agree with the appraiser's analysis, opinions, statements, conclusions, and the appraiser's certification.

2. I accept full responsibility for the contents of this appraisal report including, but not limited to, the appraiser's analysis, opinions, statements, conclusions, and the appraiser's certification.

3. The appraiser identified in this appraisal report is either a sub-contractor or an employee of the supervisory appraiser (or the appraisal firm), is qualified to perform this appraisal, and is acceptable to perform this appraisal under the applicable state law.

4. This appraisal report complies with the Uniform Standards of Professional Appraisal Practice that were adopted and promulgated by the Appraisal Standards Board of The Appraisal Foundation and that were in place at the time this appraisal report was prepared.

5. If this appraisal report was transmitted as an "electronic record" containing my "electronic signature," as those terms are defined in applicable federal and/or state laws (excluding audio and video recordings), or a facsimile transmission of this appraisal report containing a copy or representation of my signature, the appraisal report shall be as effective, enforceable and valid as if a paper version of this appraisal report were delivered containing my original hand written signature.

APPRAISER R Justin Conder

Signature

Name R Justin Conder

Company Name Justin Conder Appraisal Company

Company Address 514 Walnut Street
Camden, SC 29020

Telephone Number 803-243-0123

Email Address Justinconder@hotmail.com

Date of Signature and Report 04/16/2020

Effective Date of Appraisal 04/14/2020

State Certification # 1313

or State License #

or Other (describe) State #

State SC

Expiration Date of Certification or License 06/30/2020

ADDRESS OF PROPERTY APPRAISED

1778 Sailing Club Rd
Camden, SC 29020

APPRAISED VALUE OF SUBJECT PROPERTY $ 460,000

LENDER/CLIENT

Name No AMC

Company Name First Palmetto Bank

Company Address 1105 Broad St, Camden, SC 29020

Email Address appraisals@fpsb.com

SUPERVISORY APPRAISER (ONLY IF REQUIRED)

Signature

Name

Company Name

Company Address

Telephone Number

Email Address

Date of Signature

State Certification #

or State License #

State

Expiration Date of Certification or License

SUBJECT PROPERTY

☐ Did not inspect subject property

☐ Did inspect exterior of subject property from street
Date of Inspection

☐ Did inspect interior and exterior of subject property
Date of Inspection

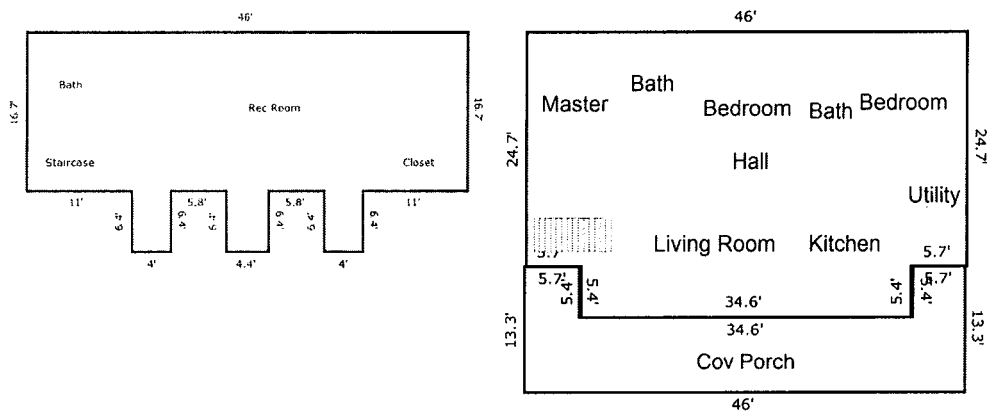
COMPARABLE SALES

☐ Did not inspect exterior of comparable sales from street

☐ Did inspect exterior of comparable sales from street
Date of Inspection

Building Sketch

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



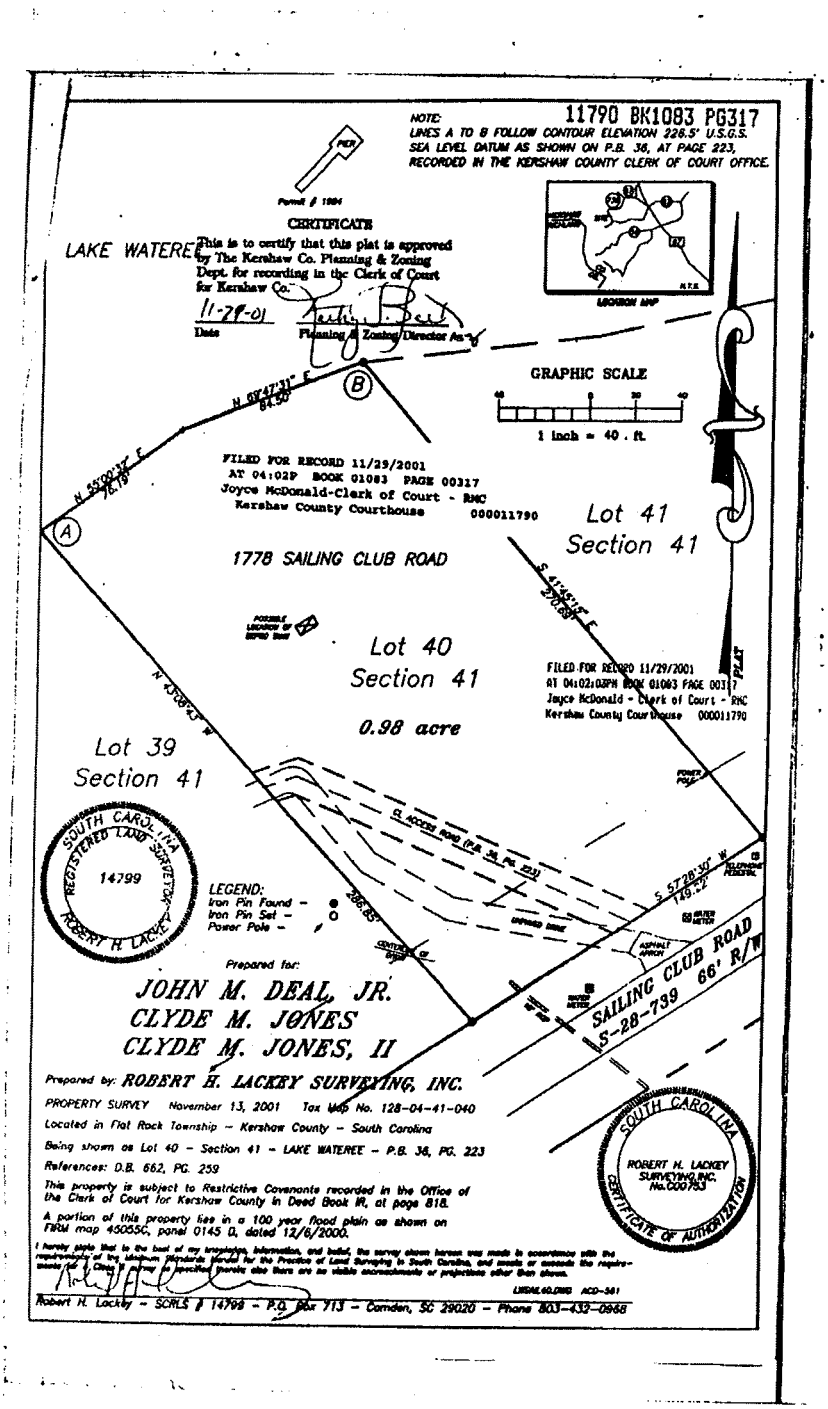
TOTAL Sketch by a la mode, inc.

Area Calculations Summary

Living Area		**Calculation Details**	
First Floor	1323.04 Sq ft	34.6 × 5.4	= 186.84
		24.7 × 46	= 1136.2
First Floor	847.56 Sq ft	4 × 6.4	= 25.6
		4.4 × 6.4	= 28.16
		4 × 6.4	= 25.6
		16.7 × 46	= 768.2
Total Living Area (Rounded):	**2171 Sq ft**		
Non-living Area			
Porch	424.96 Sq ft	46 × 7.9	= 363.4
		5.4 × 5.7	= 30.78
		5.4 × 5.7	= 30.78

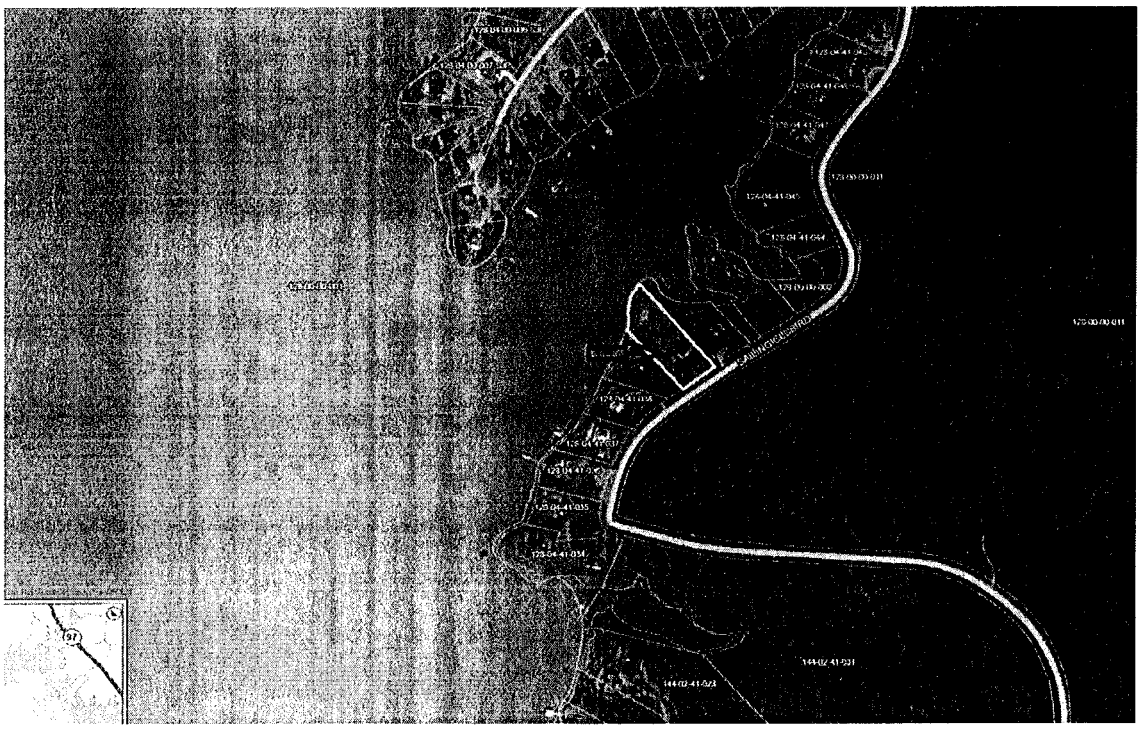
Plat Map

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



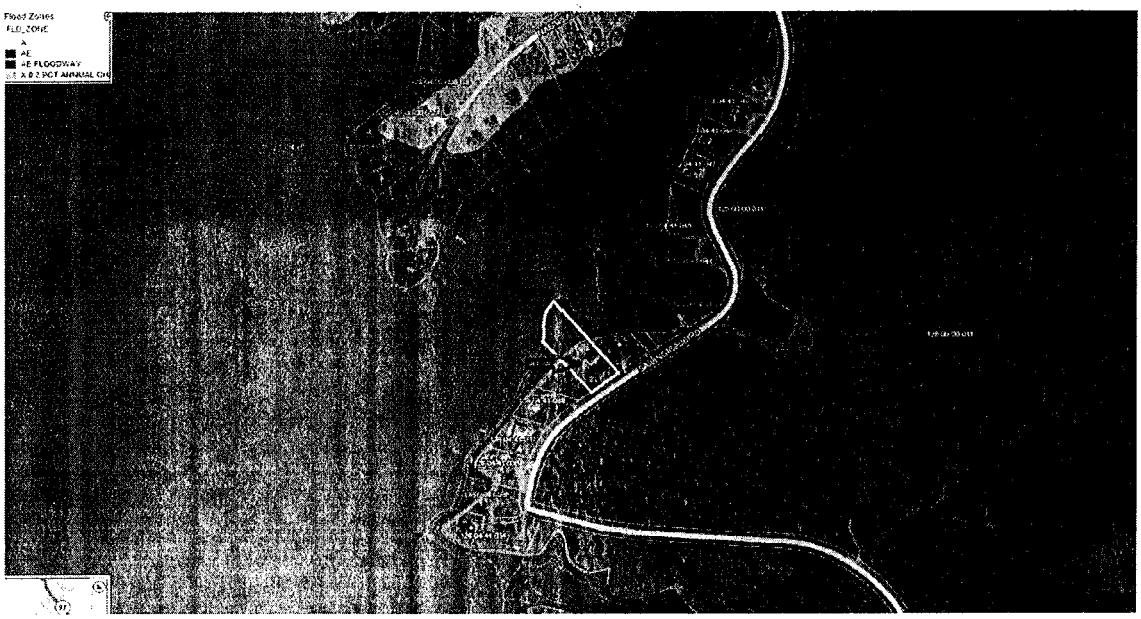
Site Map

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



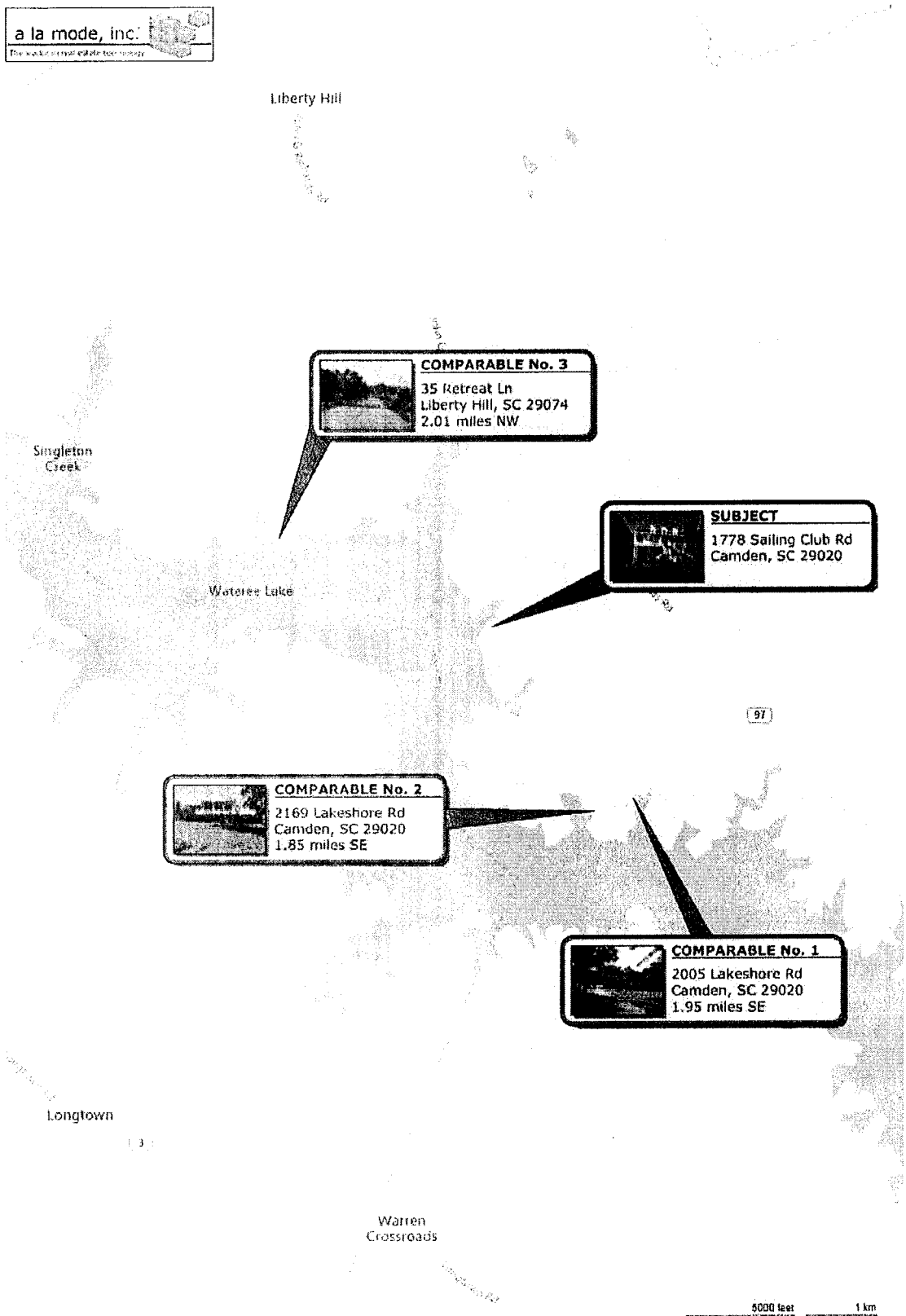
Flood Map

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



Location Map

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



Subject Photo Page

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



Subject Front

1778 Sailing Club Rd

Sales Price	
Gross Living Area	2,171
Total Rooms	6
Total Bedrooms	4
Total Bathrooms	3.0
Location	N;WtrFr;
View	B;Wtr;
Site	42689 sf
Quality	Q3
Age	17



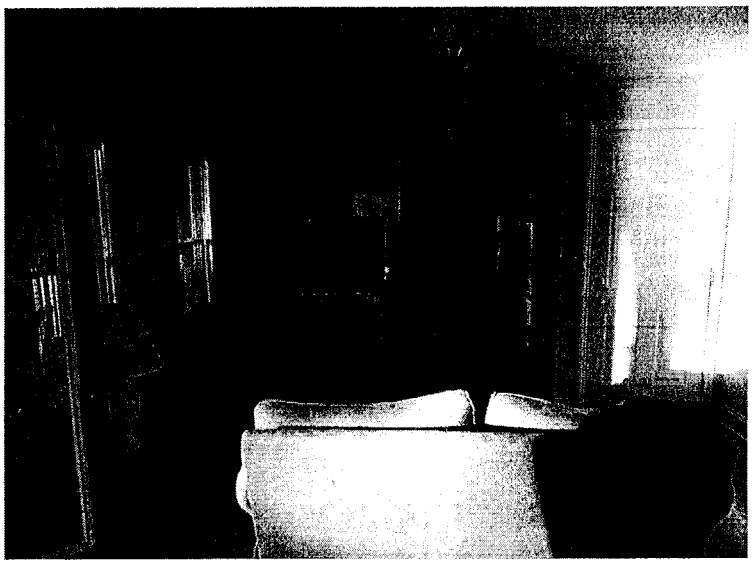
Subject Rear



Subject Street

Subject Interior Photo Page

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



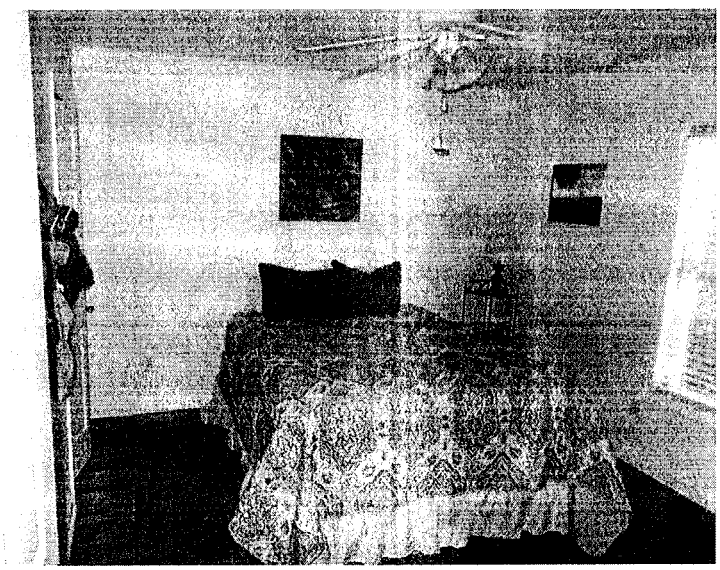
Subject Interior

1778 Sailing Club Rd

Sales Price	
Gross Living Area	2,171
Total Rooms	6
Total Bedrooms	4
Total Bathrooms	3.0
Location	N;WtrFr;
View	B;Wtr;
Site	42689 sf
Quality	Q3
Age	17



Subject Interior



Subject Interior

Subject Interior Photo Page

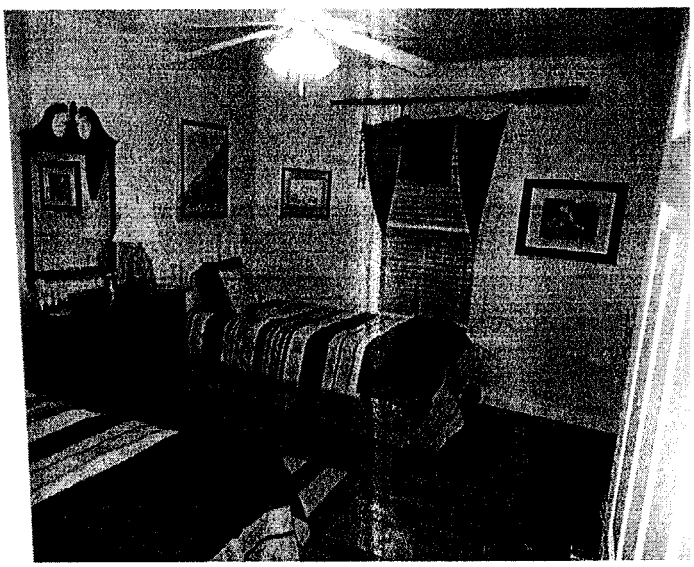
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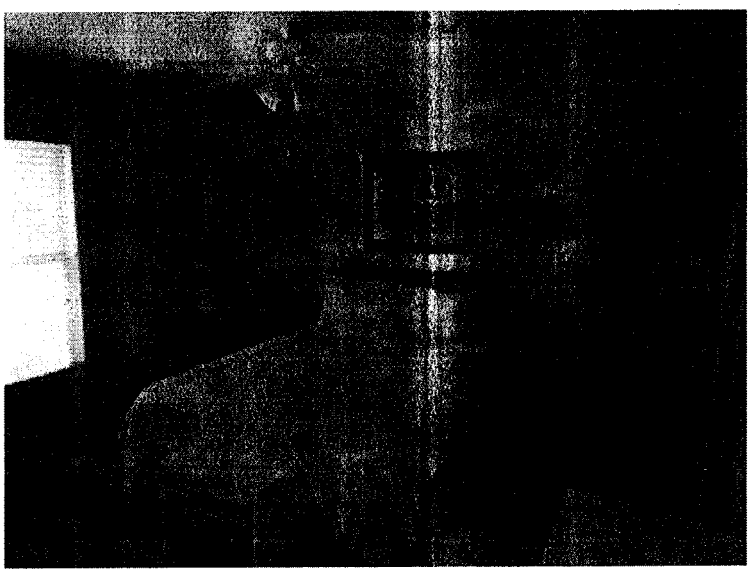
Subject Interior

1778 Sailing Club Rd

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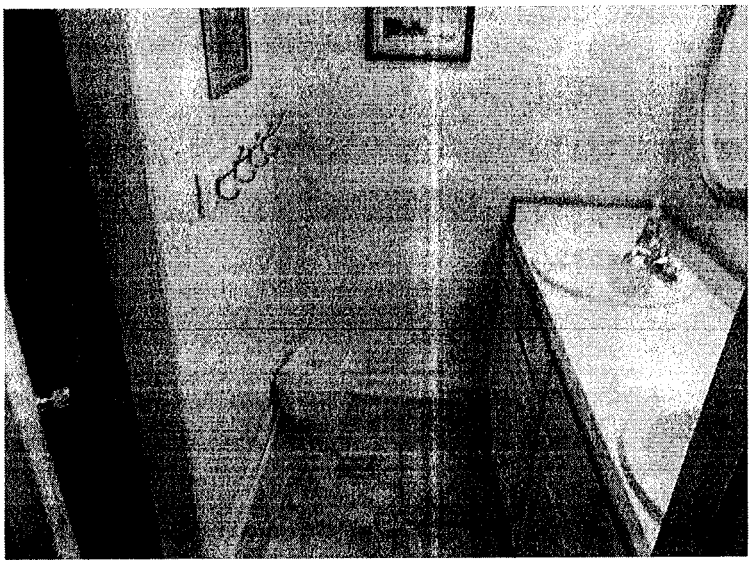
Subject Interior



Subject Interior

Subject Interior Photo Page

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City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



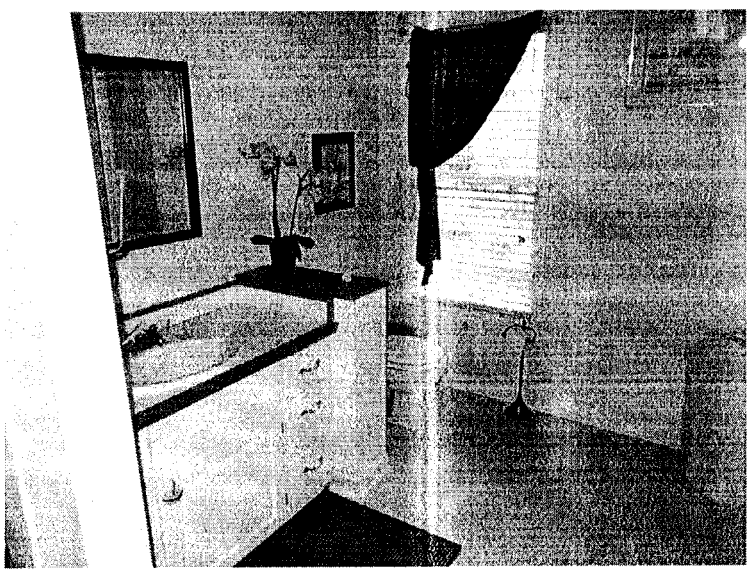
Subject Interior

1778 Sailing Club Rd

Sales Price	
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Subject Interior



Subject Interior

Subject Photo Page

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



Carport/Stg

1778 Sailing Club Rd

Sales Price	
Gross Living Area	2,171
Total Rooms	6
Total Bedrooms	4
Total Bathrooms	3.0
Location	N;WtrFr;
View	B;Wtr;
Site	42689 sf
Quality	Q3
Age	17



Dock



View

Comparable Photo Page

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



Comparable 1

2005 Lakeshore Rd

Prox. to Subject	1.95 miles SE
Sales Price	452,000
Gross Living Area	1,930
Total Rooms	8
Total Bedrooms	3
Total Bathrooms	2.1
Location	N;WtrFr;
View	N;Wtr;
Site	30,928 sf
Quality	Q3
Age	12



Comparable 2

2169 Lakeshore Rd

Prox. to Subject	1.85 miles SE
Sales Price	462,000
Gross Living Area	2,081
Total Rooms	6
Total Bedrooms	3
Total Bathrooms	2.1
Location	N;WtrFr;
View	N;Wtr;
Site	27007 sf
Quality	Q3
Age	20



Comparable 3

35 Retreat Ln

Prox. to Subject	2.01 miles NW
Sales Price	481,570
Gross Living Area	2,238
Total Rooms	8
Total Bedrooms	4
Total Bathrooms	3.1
Location	N;WtrFr;
View	B;Wtr;
Site	40075 sf
Quality	Q3
Age	13

Comparable Photo Page

Borrower	Clyde Marcus Jones, II						
Property Address	1778 Sailing Club Rd						
City	Camden	County	Kershaw	State	SC	Zip Code	29020
Lender/Client	First Palmetto Bank						



Comparable 3

MLS Photo
Prox. to Subject
Sale Price
Gross Living Area
Total Rooms
Total Bedrooms
Total Bathrooms
Location
View
Site
Quality
Age

Comparable

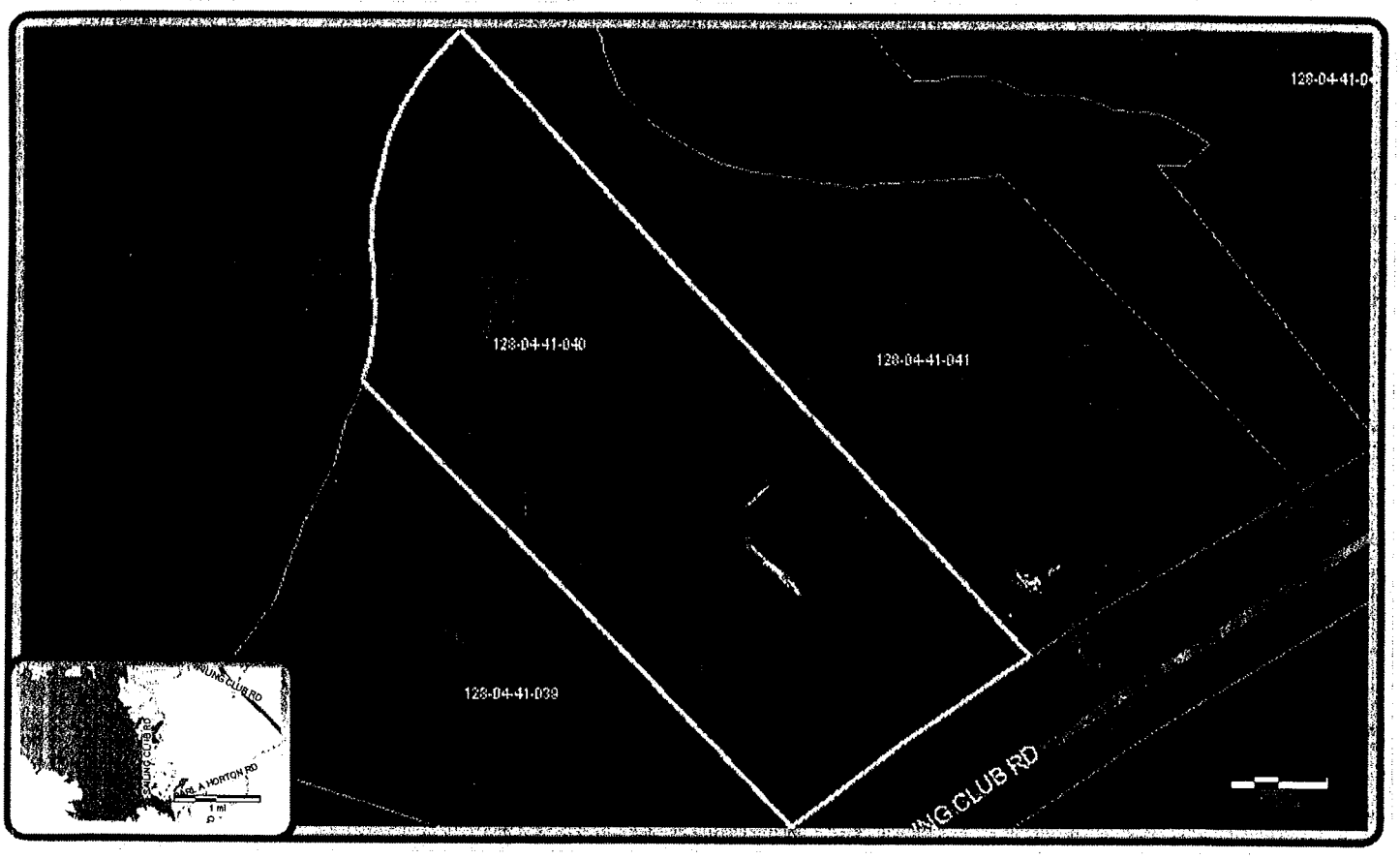
Prox. to Subject
Sale Price
Gross Living Area
Total Rooms
Total Bedrooms
Total Bathrooms
Location
View
Site
Quality
Age

Comparable

Prox. to Subject
Sale Price
Gross Living Area
Total Rooms
Total Bedrooms
Total Bathrooms
Location
View
Site
Quality
Age

Parcel Information Report (2020/05/19 16:45)

128-04-41-040



General Information

Parcel Number 128-04-41-040	**Building Type** Residential	**Grantor** COPP WILLIARD C
Owner Name DEAL J M JR	**Finished Building Area** 2107	**Previous Deed Book-Page** 1089-318
Owner Name2	**Number Of Bedrooms** 0	**Previous Sale Date** 2001/11/29
Owner Name3	**Number Of Full Baths** 0	**Previous Sale Price** $114,900.00
Location Address 1728 SAILING CLUB RD CAMDEN, SC 29020	**Exterior Wall Type**	**Zoning**
Mailing Address 112 WELSH STREET CAMDEN,SC 29020	**Detached Garage Carport**	**Deed Book-Page** 3489-17
Legal Description LAKE WATEREE	**Primary LandUse Code** RG	**Plat Book** 1089
Year Built 2003	**Taxable Land Value** 160000	**Plat Page** 317
Total Acreage 0.00	**Total Yard Item Value** 1800	**District** 281
Sale Date 2016/02/12	**Total Building Value** 129600	
Sale Price $0.00	**Total Taxable Value** 291000	
Sale Type No Match	**Total Full Market Value** 291000	

Exhibit 35

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Clyde Marcus Jones, II, on behalf of himself and all others similarly situated,

Plaintiffs,

vs. Case No. 3:24-cv-01281-MGL

Duke Energy Corporation and Duke Energy Carolinas, LLC,

Defendants.

VIDEOTAPED TELECONFERENCE
DEPOSITION OF: MARTHA JONES
DATE: Monday, March 30, 2026
TIME: 9:34 a.m.
TIME ENDED: 10:35 a.m.
LOCATION: PARKER POE ADAMS & BERNSTEIN, LLP
1221 Main Street, Suite 1100
Columbia, South Carolina
REPORTED BY: YVONNE R. THURSTON-BOHANNON
Registered Merit Reporter,
Certified Realtime Reporter
Job No. CS7934395

would make this deposition difficult for you today, do you?

A. No.

Q. And do you consider yourself to be in good health today?

A. Yes.

Q. Have you ever had any major health issues?

A. No, I have not.

Q. What's your date of birth?

A. Seven -- July 18th, 2001.

Q. And so how old are you today?

A. I am 24 years old.

Q. Where did you grow up?

A. Camden, South Carolina.

Q. And where did you live in Camden, the address?

A. 410 Hampton Street.

Q. And that is different from the Lake Wateree property; is that right?

A. Yes.

Q. What's the address for the Lake Wateree property?

A. 1778 Sailing Club Road.

Q. And it looked like to me, unless my

math is fooling me, that you were born the year the property was originally bought for the family; is that right?

A. I -- I am not sure.

Q. Okay. If the property was bought in November of 2001, you were born in July of that year --

A. Yes.

Q. -- is that right?

A. Uh-huh.

Q. And so you spent your childhood using the Lake Wateree property; is that fair?

A. Yes.

Q. What's your Social Security number?

THE VIDEOGRAPHER: Can we go off the video for that?

MR. DUNLAP: Sure.

(Off-the-record discussion.)

THE VIDEOGRAPHER: We are back on the record at 9:40 a.m.

BY MR. DUNLAP:

Q. Tell me about your educational history.

A. I graduated from Camden High School, and then I went on -- in 2019, and then I went to the University of South Carolina and graduated in

Sailing Club Road property, how would you describe it?

A. Huh. That's a very good question. Beautiful.

Q. Anything else?

A. It's very family oriented.

Q. Anything else?

A. No.

Q. Is it fair to say that you have in your lifetime had some of your best lifetime memories using and enjoying Lake Wateree?

A. Yes.

Q. When you all would go to the property, did -- did the -- did the children sleep on the top level?

A. Yes.

Q. And mom and dad would have slept below?

A. Yes.

Q. So you were trusted, huh?

A. Yes.

Q. Do you know how many acres the property is?

A. No.

Q. Is the only structure on the property the house?

15 years.

Q. Okay. How often do you go now?

A. Not as often as I used to.

Q. So four, five times a summer?

A. Probably so, yeah.

Q. Ten times a summer?

A. Probably maybe once a month in the summer, twice a month, more around a summer holiday.

Q. And as you were growing up before you moved out of the home, did -- during the summer you all would go weekly --

A. Yes.

Q. -- or would you just stay up there the whole summer?

A. We would pretty much be in and out of town weekly throughout the whole summer.

Q. And the property is waterfront; is that right?

A. Yes.

Q. How deep is the water off the dock?

A. I am not sure.

Q. You could walk into the water from the land; is that --

A. Yes.

Q. And is it -- was it your observation that your dad was able to use and enjoy the property and Lake Wateree while you were growing up?

A. Yes.

MR. SHEHEEN: Object to the form.

BY MR. DUNLAP:

Q. Has it also been your observation that after your childhood when you were no longer still living at home that your dad continued to use and enjoy the Lake Wateree property and would have cherished memories of the use and enjoyment of the property?

MR. SHEHEEN: Object to the form.

THE WITNESS: I am not sure since I was not there since I left home.

BY MR. DUNLAP:

Q. Have you ever been there with him --

A. Yes.

Q. -- since you left home?

A. Uh-huh.

Q. And on those occasions when you were there with him, was he able to use and enjoy the property to the fullest extent, and do you think that he would have cherished memories about those

times as well?

MR. SHEHEEN: Object to the form.

THE WITNESS: I'm not sure about the "fullest extent" part, but, yes, we did enjoy the lake together.

BY MR. DUNLAP:

Q. And he would have been there with you and your sister and your mom many times?

A. Yes.

Q. And -- and that's still true today. You all are still going and using and enjoying the property; is that fair?

A. Yes.

Q. And your mom, was she able to use and enjoy the property while you were growing up, and is it your observation of her that she would have had cherished memories of using and enjoying the property, correct?

A. Yes.

Q. Both the property and Lake Wateree?

A. Yes.

Q. Was there a sailing club close to your property?

A. Yes.

Q. And so if you -- if you went to the

A. I could not tell you an exact date. It was pretty young.
Q. Five?
A. Probably before that.
Q. Okay.
A. Yeah.
Q. And maybe early on with a life jacket just floating?
A. Yes. Yes.
Q. Okay. So during the summer would you all swim on a daily basis, you and your sister?
A. Yes.
Q. And did your sister enjoy swimming too?
A. Yes.
Q. Who was the better swimmer?
A. Me.
Q. What about a kayak or paddle board, did you all ever have --
A. Yes.
Q. Which -- both?
A. We had a paddle board.
Q. And who enjoyed using the paddle board?
A. My sister and I did.
Q. So during the summers if you were out there during the week, I'm guessing every day when

CERTIFICATE OF REPORTER

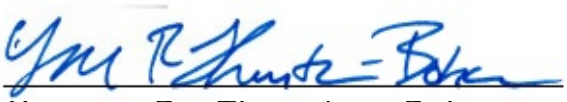
I, Yvonne R. Thurston-Bohannon, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public for the State of South Carolina at Large, do hereby certify:

That the reading and signing of the foregoing deposition by the witness is waived.

That the foregoing transcript was taken before me on the date and at the time and location stated on page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal April 1, 2026, at Columbia, Richland County, South Carolina.



Yvonne R. Thurston-Bohannon
Registered Merit
Reporter, CRR
My Commission expires
May 14, 2035

Exhibit 36

Entire home

Serenity with a Sunset

Lakefront vacation home in Camden with kitchen



10 **Exceptional**

See all 61 reviews >

EXHIBIT 8W
PENGAD 800-631-6989
#5 JONES
10-8-25

4 bedrooms 3 bathrooms Sleeps 13 2100 sq ft

Popular amenities

Dryer
Washer
Kitchen
Parking available
Barbecue grill
Outdoor Space

See all >

Explore the area



Lake Wateree State Park
Lake Wateree 2 min drive
Carolina Motorsports Park 42 min drive

See all about this area >

Camden, SC
View in a map >

Add dates for prices

Check-in
Select date

Check-out
Select date

Travelers
1 room, 2 travelers

Check availability

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Where to? Camden, South Carolina, United States ... Dates Oct 10 - Oct 12 Travelers 2 travelers Search

← See all properties Save

Entire home

Serenity with a Sunset

Lakefront vacation home in Camden with kitchen



Overview Amenities Policies Location

Overview Amenities Policies Location

10 Exceptional

See all 61 reviews >

4 bedrooms

3 bathrooms

Sleeps 13

2100 sq ft

Popular amenities

Dryer

Parking available

Washer

Barbecue grill

Kitchen

Outdoor Space

See all >

Explore the area



Lake Wateree State Park

Lake Wateree 2 min drive

Carolina Motorsports Park 42 min drive

See all about this area >

Camden, SC

View in a map >

Add dates for prices

Check-in
Select date

Check-out
Select date

Travelers
1 room, 2 travelers

Check availability

Rooms & beds

4 bedrooms (sleeps 13)



Bedroom 1

1 Queen Bed



Bedroom 2

1 Queen Bed



Bedroom 3

1 Double Bed



Bedroom 4 +4

6 Twin Beds and 2 Double Futons

3 bathrooms

Bathroom 1

Soap · Towels provided · Bathtub or shower · Toilet · Hair dryer

Bathroom 2

Soap · Towels provided · Bathtub or shower · Toilet

Bathroom 3

Soap · Towels provided · Toilet · Shower only

Overview Amenities Policies Location

Spaces

Porch or lanai
Kitchen
Garden
Dining area

See all rooms and beds details

About this property

Serenity with a Sunset

Location: 1778 Sailing Club Road (Google is incorrect- which says 1784)
Main floor: Large porch with lots of seating, 3 bedrooms (Q, Q, F), 2 full baths (tub/shower), greatroom, eat-in kitchen, laundry & pantry. Top floor: open floor (5 T, 1 futon with top T bunk), sitting area with tv, full bath (shower-no tub).
Under house: all open space with seating. Outdoors: large parking area, large yard, large beach with shade, large dock. AMAZING view of lake.

Our prices include all fees. No hidden fees.

Rooms & beds

4 bedrooms (sleeps 13)



Bedroom 1

1 Queen Bed



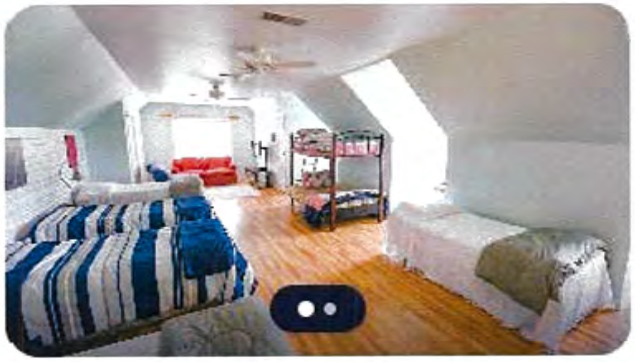
Bedroom 2

1 Queen Bed



Bedroom 3

1 Double Bed



Bedroom 4

6 Twin Beds and 2 Double Futons

Open upstairs room- sleeps 8

Rooms & beds



Bedroom 3

1 Double Bed



Bedroom 4

6 Twin Beds and 2 Double Futons
Open upstairs room- sleeps 8

3 bathrooms

Bathroom 1

Soap · Towels provided · Bathtub or shower · Toilet · Hair dryer
In Main bedroom. 2-sink vanity

Bathroom 2

Soap · Towels provided · Bathtub or shower · Toilet
Hall

Bathroom 3

Soap · Towels provided · Toilet · Shower only
Upstairs

Spaces

Dining area
Seating for 11 people
Table seats 8, bar seats 3, porch table seats 4

Kitchen

Lawn/garden

Porch/veranda
Porch

Overview Amenities Policies Location

About this property

Serenity with a Sunset

Location: 1778 Sailing Club Road (Google is incorrect- which says 1784)
Main floor: Large porch with lots of seating. 3 bedrooms (Q, Q, F). 2 full baths (tub/shower). greatroom. eat-in kitchen. laundry & pantry. Top floor: open floor (5 T, 1 futon with top T bunk). sitting area with tv. full bath (shower-no tub).
Under house: all open space with seating. Outdoors: large parking area. large yard. large beach with shade. large dock. AMAZING view of lake.

Our prices include all fees. No hidden fees.

Amenities

- Kitchen
- Washer
- Dryer
- Free WiFi
- Air conditioning
- Outdoor Space

See all 63 amenities

Have a question?

Beta

Get instant answers with AI powered search of property information and reviews.

Ask a question
Is there free parking?

Amenities

Essentials

- Wireless internet
- Free wifi
- Internet
- Towels provided
- Linens provided
- Air conditioning
- Hair dryer
- Toilet paper
- Paper towels
- Basic soaps
- Heating

Kitchen

- Kitchen
- Refrigerator
- Dishwasher
- Microwave
- Stove
- Oven
- Grill
- Kitchen island
- Dishes & utensils
- Dining table
- Coffee maker
  Pot and pod
- Coffee grinder
- Kettle
- Blender
- Ice maker
- Toaster
- Lobster pot

Outside

- Fire pit
- Outdoor furniture
- Beach chairs
- Kayak/canoe
  2 Kayaks, 1 paddle board
- Water sports gear
  There is a dock large enough for at least 2 boats. Guests may use Wateree Marina for boat ramp. (see watereemarina.com)

Entertainment

Amenities

Entertainment

Games
Board games, corn hole, cards, poker chips, puzzles

Books

Television
Greatroom=Smart tv. Main bedroom=TV with Roku. Upper floor=TV with Roku

Smart TV

DVD player
Upstairs only

Video library
We do have some dvd's.

Baby & toddler

Baby gate

Books for kids

Laundry

Washing machine

Dryer

Iron & board

Parking

Parking
Large driveway

Safety

Carbon monoxide detector not reported (host has not indicated whether there is a carbon monoxide detector on the property; consider bringing a portable detector)

Smoke detector (host has indicated there is a smoke detector on the property)
Every room

Deadbolt lock

Fire extinguisher
Pantry

First aid kit
Hall closet

Exterior lighting

Emergency exit route
Upstairs has emergency ladder if needed.

Fire station contact
911

Hospital contact
911

Police contact
911

Accessibility

Wheelchair inaccessible

Amenities

Parking
Large driveway

Safety

Carbon monoxide detector not reported (host has not indicated whether there is a carbon monoxide detector on the property; consider bringing a portable detector)

Smoke detector (host has indicated there is a smoke detector on the property)
Every room

Deadbolt lock

Fire extinguisher
Pantry

First aid kit
Hall closet

Exterior lighting

Emergency exit route
Upstairs has emergency ladder if needed.

Fire station contact
911

Hospital contact
911

Police contact
911

Accessibility

Wheelchair inaccessible

Location type

Waterfront

Lake

Lake view

Nearby activities

Boating

Marina

Suitability

Minimum age limit for renters

Pets

No pets allowed

Notes

There is an extra refrigerator, table umbrellas, fishing equipment, beach chairs and a few water toys/floats, in storage area under house.

Overview Amenities Policies Location

Similar properties



Lake Front 6 Bedroom Home on Beautiful Lake Wateree.

Ridgeway

- ✓ Kitchen
- ✓ Washer
- ✓ Dryer
- ✓ Air conditioning

10/10 (44 reviews)



Impeccable Home w/ Dock & Pool on Lake Wateree!

Camden

- ✓ Pool
- ✓ Kitchen
- ✓ Washer
- ✓ Dryer

9.6/10 (35 reviews)



Charming Waterfront Ridgeway Cabin w/ Dock!

Ridgeway

- ✓ Kitchen
- ✓ Free WiFi
- ✓ Air conditioning
- ✓ Outdoor Space

9.8/10 (47 reviews)



The Estate: 4-BR, 6000 SF

Camden

- ✓ Hot Tub
- ✓ Kitchen
- ✓ Washer
- ✓ Dryer

9.4/10 (18 reviews)



Rel
V:
Li
✓
✓
✓
✓
9.8

House Rules

Check in after 3:00 PM

Check out before 11:00 AM

Minimum age to rent: 21

Children
Children allowed: ages 0-17

Events
No events allowed

Pets
No pets allowed

Smoking
Smoking is not permitted

Important information

You need to know

Extra-person charges may apply and vary depending on property policy

Government-issued photo identification and a credit card, debit card, or cash deposit may be required at check-in for incidental charges

Special requests are subject to availability upon check-in and may incur additional charges; special requests cannot be guaranteed

Onsite parties or group events are strictly prohibited

Host has not indicated whether there is a carbon monoxide detector on the property; consider bringing a portable detector with you on the trip

Host has indicated there is a smoke detector on the property

Safety features at this property include a fire extinguisher, a first aid kit, and a deadbolt lock

We should mention

This property does not have elevators

About the neighborhood

Camden

Located in Camden, this vacation home is on the waterfront. Camden Archives and Museum and Historic Camden Revolutionary War Site are cultural highlights, and some of the area's landmarks include Battle of Hanging Rock Monument and Bethesda Presbyterian Church. Looking to enjoy an event or a game while in town? See what's happening at Carolina Motorsports Park or Springdale Race Course. Take an opportunity to explore the area for water adventures such as motor boating.

View more Vacation Homes in Camden



Camden, SC
View in a map

Overview Amenities Policies Location

View more Vacation Homes in Camden



Camden, SC
View in a map

What's nearby

Lake Wateree - 2 min drive - 1.0 km

Springdale Race Course - 34 min drive - 30.7 km

Bethesda Presbyterian Church - 37 min drive - 33.2 km

Historic Camden Revolutionary War Site - 40 min drive - 35.2 km

Carolina Motorsports Park - 42 min drive - 31.3 km

Restaurants

The Retreat At Lake Wateree - 62 min drive

Windmill Restaurant - 59 min drive

Creekside Grill & Ale - 8 min drive

Club Clyde - 74 min drive

Beaver Creek Restaurant - 8 min drive

Getting around

Camden Station - 28 min drive

Columbia Metropolitan Airport (CAE) - 73 min drive

Frequently asked questions

- **Is Serenity with a Sunset pet-friendly?**
- **What time is check-in at Serenity with a Sunset?**
- **What time is check-out at Serenity with a Sunset?**
- **Where is Serenity with a Sunset located?**

Overview Amenities Policies Location

10 Exceptional
61 reviews

Reviews are presented in chronological order, subject to a moderation process, and verified unless otherwise labeled.

Learn more

10 - Excellent	57
8 - Good	4
6 - Okay	0
4 - Poor	0
2 - Terrible	0

10/10 Cleanliness

10/10 Check-in

10/10 Communication

10/10 Location

9.8/10 Listing accuracy

10/10 Excellent

Robin M.
Jan 13, 2025

Liked: Cleanliness, check-in, communication, location, listing accuracy

Girls weekend

Our stay here was excellent! The house was very clean and we had a great time. The view of the lake was beautiful and had a beach area that is great for families. We will definitely stay here again!

Stayed 2 nights in Jan 2025

0

10/10 Excellent

Jennifer M.
Apr 27, 2025

Liked: Cleanliness, check-in, communication, location, listing accuracy

Lovely home!

Great lake property. Loved sitting on the porch w coffee in the mornings.

Stayed 3 nights in Apr 2025

0

10/10 Excellent

Dina C.
Jun 8, 2025

Liked: Cleanliness, check-in, communication, location, listing accuracy

Had another great year!! Always choose this house because it's the best. Fits our needs perfectly!!

Stayed 7 nights in Jun 2025

0

Overview Amenities Policies Location

0

See all reviews

About the host

Hosted by Marc Jones



Marc and Kathryn Jones live in Camden, SC.

Why they chose this property

Built in 2003 and named for the owners' deep Gamecock ties, "The Roost" gives its visitors a spectacular view of Lake Wateree any time of day. With the sunrise, observe the egret or duck as he takes his early morning route across the serene lake. Mornings are only disturbed by the of the occasional fisherman's lure. Throughout the lazy day, there is always a view of a few sailboats resting at the dock of the sailing club just across the cove. Breezy days often bring their captains out to play and practice their nautical skills. Evenings are not for only observing, but for participating in one of the most breath-taking sunsets anywhere. From the porch, from the shore, or from the dock the sunset view is a spiritual experience.

What makes this property unique

The view and the beach!

Languages:

English

Tell us how we can improve our site

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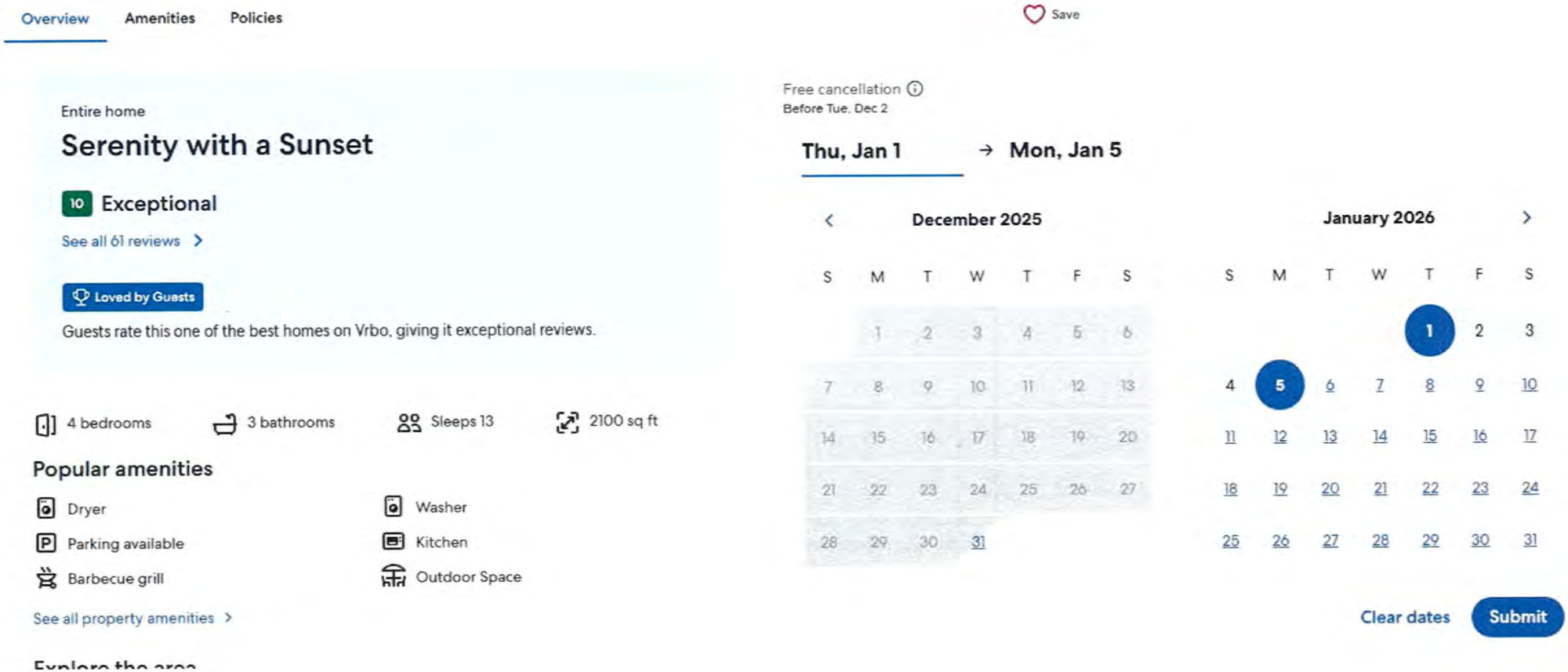
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Policies
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Serenity with a Sunset
10 Exceptional
See all 61 reviews
Loved by Guests
Guests rate this one of the best homes on Vrbo, giving it exceptional reviews.
4 bedrooms
3 bathrooms
Sleeps 13
2100 sq ft
Popular amenities
Dryer
Washer
Parking available
Kitchen
Barbecue grill
Outdoor Space
See all property amenities
Free cancellation
Before Tue, Dec 2
Thu, Jan 1
Mon, Jan 5
December 2025
January 2026
S M T W T F S
Clear dates
Submit

Vrbo

Where to?
Serenity with a Sunset

Dates
Nov 7 - Nov 10

Tra
2

Filters | Popular | Price | Rooms & spaces | Sort by recommended | Compare properties

80 properties

How our sort order works

Members always get our best prices when signed in

Sign in Learn more

You picked this property →



Camden

Serenity with a Sunset

House · Sleeps 13 · 4 bedrooms · 3 bathrooms

Nov 7 - Nov 10

10 Exceptional
61 reviews

We are sold out for your dates

Available for similar dates

Wed, Dec 31 - Sat, Jan 3

Thu, Jan 1 - Sun, Jan 4

Fri, Jan 2 - Mon, Jan 5

Overview Amenities Policies

Save

Entire home

Serenity with a Sunset

10 Exceptional

See all 61 reviews >

Loved by Guests

Guests rate this one of the best homes on Vrbo, giving it exceptional reviews.

4 bedrooms 3 bathrooms Sleeps 13 2100 sq ft

Popular amenities

- Dryer
- Parking available
- Barbecue grill
- Washer
- Kitchen
- Outdoor Space

See all property amenities >

Explore the area

Lake Wateree State Park

Free cancellation

Before Wed, Dec 3

Your dates are available

Start date Jan 2

End date Jan 5

Travelers 2 travelers

$514

$1,541 for 3 nights

All fees included

Starting at $84/mo or 0% APR with affirm. Learn more

Request to book

You will not be charged yet

Contact host

Property # 1127295

Entire home

Serenity with a Sunset

10 Exceptional

See all 61 reviews >

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4 bedrooms | 3 bathrooms | Sleeps 13 | 2100 sq ft

Popular amenities

- Dryer
- Washer
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See all property amenities >

Explore the area



- Lake Wateree State Park
- Lake Wateree — 2 min drive
- Carolina Motorsports Park — 42 min drive

This property is not available for your dates on Vrbo. Try new dates to check availability.

See available properties for these dates
View search results

Sat, Dec 27 → Mon, Dec 29

October 2025

S	M	T	W	T	F	S
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5	6	7	8	9	10	11
12	13	14	15	16	17	18
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November 2025

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23	24	25	26	27	28	29
30						

Clear dates | Submit

Entire home

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See all property amenities >

Explore the area



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November 2025

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December 2025

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21	22	23	24	25	26	27
28	29	30	31			

Clear dates Submit

Entire home

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4 bedrooms | 3 bathrooms | Sleeps 13 | 2100 sq ft

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See all property amenities >

Explore the area



Lake Wateree State Park

Lake Wateree 2 min drive

This property is not available for your dates on Vrbo. Try new dates to check availability.

See available properties for these dates

View search results

Sat, Dec 27 → Mon, Dec 29

January 2026

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
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February 2026

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22	23	24	25	26	27	28

Clear dates Submit

Guest reviews

Loved by Guests

10/10 Exceptional

61 reviews

What guests liked

- The house was very clean and well-maintained. (2 reviews)
- The property provided a comfortable and enjoyable experience for families with kids who had a blast. (2 reviews)
- The beach at the property was perfect for relaxation and a great spot for a lake weekend. (2 reviews)

From real guest reviews summarized by AI.

Cleanliness	Check-in	Communication	Location	Listing accuracy
10	10	10	10	9.8

Search reviews

Sort by: Most Recent

Traveler type: All

10/10 Excellent

Verified traveler
Traveled with family and young children
Sep 22, 2025

Liked: cleanliness, check-in, communication, location

Nice property. We thoroughly enjoyed our family vacation. Beautiful sunsets and nice beach

Stayed 3 nights in Sep 2025

Guest reviews

8/10 Good

DeeDee H.
Traveled with family and young children
Jul 20, 2025

Liked: cleanliness, check-in, communication, location, listing accuracy

Lovely house with plenty of beds but not enough sitting room if you're a big family and stuck inside due to weather. The only real complaint we had was there was 1/2 a roll of toilet paper left in each bathroom and 1 extra in the hall closet. We bought a 12 pack and stocked up for the next family! And less than 1/2 a roll of paper towels. We bought a 2 pack and left what we didn't use. The beach area was full of trash and dead fish but we cleaned that up. Enough of the cons!For the pros: This place has a large sitting area under the house, we used that space every evening. The porch is fantastic for morning coffee. The best part was the easy access to the water! We lounged in the water all day long. It was exactly what we hoped for. Fishing off the pier was a bonus. Albeit the pier needs a little repair.Great stay for our family getaway. We would definitely book here again.

See less

Stayed 3 nights in Jul 2025

10/10 Excellent

Meagan J.
Traveled with family and young children
Jun 15, 2025

Liked: cleanliness, check-in, communication, location, listing accuracy

Just left an incredible vacation at this amazing house! The house was clean, well stocked, and a great setup for large families. The beach was the perfect spot for the kids to play and adults to relax. Marc and Kathryn were amazing to work with and replied quickly anytime we had a question. Already planning to rebook for next summer. My husband said his favorite part was pretending to rub Howard's Rock and run down the hill - GO TIGERS!

Stayed 6 nights in Jun 2025

Guest reviews

10/10 Excellent

Dina C.
Traveled with family and young children
Jun 8, 2025

Liked: cleanliness, check-in, communication, location, listing accuracy

Had another great year!! Always choose this house because it's the best. Fits our needs perfectly!!

Stayed 7 nights in Jun 2025

10/10 Excellent

Brad S.
Traveled with family
May 8, 2025

Liked: cleanliness, check-in, communication, location, listing accuracy

Stayed 4 nights in Apr 2025

10/10 Excellent

Jennifer M.
Apr 27, 2025

Liked: cleanliness, check-in, communication, location, listing accuracy

Lovely home!

Great lake property. Loved sitting on the porch w coffee in the mornings.

Stayed 3 nights in Apr 2025

10/10 Excellent

Robin M.
Traveled with group
Jan 13, 2025

Liked: cleanliness, check-in, communication, location, listing accuracy

Girls weekend

Our stay here was excellent! The house was very clean and we had a great time. The view of the lake was beautiful and had a beach area that is great for families. We will definitely stay here again!

Stayed 2 nights in Jan 2025

Guest reviews

10/10 Excellent

Kawsar T.
Dec 5, 2024

Liked: cleanliness, check-in, communication, location, listing accuracy

Great house!

A beautiful house, clean lots of things to do inside on a cold winter day. Beautiful view of the lake and sunset. My family greatly enjoyed our time there.

Stayed 2 nights in Nov 2024

10/10 Excellent

Angela G.
Traveled with family and young children
Jul 29, 2024

Liked: cleanliness, check-in, communication, location, listing accuracy

Relaxing

Overall a relaxing weekend. The house had everything we needed.

Stayed 3 nights in Jul 2024

10/10 Excellent

Renee H.
Traveled with family and young children
Oct 30, 2023

Liked: cleanliness, check-in, communication, location, listing accuracy

Great House!

My family had a great time. The house was awesome and the lake was so nice. The kids had a blast fishing and swimming.

Stayed 5 nights in Oct 2023

Guest reviews

10/10 Excellent

Anabella F.
Traveled with partner, traveled with group
Sep 17, 2023

Liked: cleanliness, check-in, communication, location, listing accuracy

Best lake property I've ever stayed

The photos of this house do not give the property justice! The view was spectacular and the beach at the bottom was the perfect hangout spot for a lake weekend! The hosts were also kind enough to supply us some birthday decorations for my boyfriends birthday! The room setups were perfect for our big group, and the property had a nice area for us to safely put our jet ski in the water without having to go to a boat launch! Everyone in our group loved the house, and we will definitely be returning! Can't wait until our next stay!

See less

Stayed 2 nights in Sep 2023

10/10 Excellent

za9L3faho8yzWdPKNpD9To7iRkL0Kq+g9gESlkyzNNmgtPxgvPeTEilPAAAAcDBuBgkqhkiG9w0BBwagY3.
May 11, 2023

Liked: cleanliness, check-in, communication, location, listing accuracy

Everything you need to relax

It was a great experience to stay in this house for a weekend. The house is spacious, very clean, very well equipped and the owner is very responsive.

Stayed 2 nights in Apr 2023

Guest reviews

10/10 Excellent

Bryan M.
Apr 23, 2023

Liked: cleanliness, check-in, communication, location, listing accuracy

Amazing

Our group loved our stay here. It was great for us and will be great for a large group, particularly with children and teens. The entire upstairs floor is essentially an open suite geared toward this, within earshot of the main floor. Views over the water are breathtaking, particularly at sunset. The yard is massive and offers plenty of space to roam and play. We're already discussing and looking forward to our return trip!

Stayed 2 nights in Apr 2023

10/10 Excellent

kathy t.
Dec 26, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

Great house for big families.

Home was just what we needed for an extended family holiday getaway. Spacious, clean and very comfortable. Hosts were extremely helpful with all of our needs.

Stayed 3 nights in Dec 2022

10/10 Excellent

MICHAEL H.
Dec 6, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

Comfortable home with beautiful view

The home was was well laid out for our group of seven. It could have easily accommodated several more people. The place had everything we needed to make meals. The huge yard gently sloped to a sandy beach. The view was as stunning and we really liked the privacy of the home. We hope to stay there again.

Stayed 2 nights in Nov 2022

Guest reviews

10/10 Excellent

Lauren O.
Oct 28, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

The most hospitable and generous

The Jones family went above and beyond to make sure the stay was comfortable and enjoyable. We couldn't be more thankful.

Stayed 2 nights in Oct 2022

10/10 Excellent

Angela C.
Aug 3, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

Fantastic setting!

The property worked out great for our family. The beach is was great for little ones who visited and the front porch is great to relax on! It's on a quiet cove with beautiful views of sunrise and sunset. Would definitely stay again.

Stayed 3 nights in Jul 2022

10/10 Excellent

Dina C.
Jun 16, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

Great week at lake wateree

Great experience renting lake house. Thank you so much for sharing your home. We had a wonderful time

Stayed 7 nights in Jun 2022

Guest reviews

10/10 Excellent

Michael B.
May 19, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

Beautiful home

This stay was awesome! Home is very nice, and so much to do at the residence! We really enjoyed this home, and I highly recommend staying here....

Stayed 3 nights in May 2022

10/10 Excellent

Tyler J.
May 1, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

BEAUTIFUL HOME!!

My group and I had a wonderful time this weekend at this Lake House. The only thing that we didn't like was walking up the hill from the boat, it definitely gave our legs a work out! 10/10 recommend this!!

Stayed 2 nights in Apr 2022

10/10 Excellent

Craig G.
Jan 31, 2022

Liked: cleanliness, check-in, communication, location, listing accuracy

Everything you need for a great weekend

Excellent

Stayed 2 nights in Jan 2022

Guest reviews

10/10 Excellent

David W., Simpsonville, SC USA
Nov 7, 2021

Liked: cleanliness, check-in, communication, location

Stunning Property

Booked this property for our friends and family to gather together for the weekend while attending the Gamecocks & Gators football game. Not only was it a wonderful experience to watch our Gamecocks beat the Gators, but to be able to stay at this beautiful property with a short drive from Columbia made it even better. Such stunning views from every area of the property and tons of room to house 11 people. We are all already planning our next trip to book this property during the warmer months. The only thing we would recommend is that the online information be updated as some items noted are no longer valid and a bit confusing.. However, that didn't change our experience or our thoughts to give this property a lesser rating as ehe owners were excellent with responding to our questions and working with us for any additional accommodations. Will definitely be looking into booking this property again in 2022.

See less

Stayed 3 nights in Nov 2021

10/10 Excellent

Joel R.
Sep 20, 2021

Liked: cleanliness, check-in, communication, location, listing accuracy

Great location

Second time staying here perfect for family gatherings.

Stayed 4 nights in Sep 2021

Guest reviews

10/10 Excellent

Nicole P.
Aug 16, 2021

Liked: cleanliness, check-in, communication, location, listing accuracy

Fantastic Vacation

This is our second summer at this property and it is wonderful. Everything was easy and accurate. The view is amazing and the property is clean with lots of sleeping room! Great when you have kids! Thank you for a wonderful vacation before school started!

Stayed 7 nights in Aug 2021

10/10 Excellent

Glenn H., Florence, SC
Jul 16, 2021

Liked: cleanliness, check-in, communication, location, listing accuracy

This place was beautiful.

There were lots of extra toys that were not listed. Kayaks, paddle board, and a pool table which we enjoyed playing every night while listening to music. The driveway is a little steep especially when trying to get up while pulling my boat. I would recommend putting your boat in the water first before getting to the house. Overall this place is beautiful and relaxing.

Stayed 7 nights in Jul 2021

Guest reviews

10/10 Excellent

Sue M.
Jul 2, 2021

Liked: cleanliness, check-in, communication, location, listing accuracy

Great choice

As one previous reviewer said, the pictures don't do this property justice. Stunning lot. Not knowing what might be available, I took all the kitchen equipment I thought I would need, but the kitchen is well equipped. The owner is VERY responsive. The downstairs air went out one evening. I texted him late that evening and a repairman was at our door first thing the next morning and had it back up and running right away. We rented a pontoon from the nearby marina for a day and docked at Beaver Creek Grill for lunch. Might look rough but the service was great and everyone's food was delicious. The only problem I had on our trip was climbing the hill and the stairs, but that is because I'm almost seventy and have had two knee and hip replacements and almost all the lake homes are on hills and built high. No problem for rest of our party. Overall just great experience. Thank you for sharing your home.

See less

Stayed 7 nights in Jun 2021

10/10 Excellent

Sheri A.
May 2, 2021

Liked: cleanliness, check-in, communication, location, listing accuracy

Weekend getaway

Lovely lake home in great location with beautiful views of Lake Wateree. The owners were responsive to questions about the property and easy to work with.

Stayed 2 nights in Apr 2021

Guest reviews

10/10 Excellent

Verified traveler
Mar 28, 2021

Liked: cleanliness, check-in, communication, location, listing accuracy

Perfect lakeside home

Marc and Kathryn were attentive and extremely accommodating with us. So much to do at the house and so much more to do on the lake. Definitely recommend highly!

Stayed 4 nights in Mar 2021

10/10 Excellent

Verified traveler
Nov 23, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Relaxing Rental Home

We had a wonderful time at your beautiful lakefront home. Thank you for the use of your kayaks and paddle boat! The family enjoyed many outside activities. It was so relaxing to rest there in between busy activities for the wedding! Thank you for the use of your home. The only issue we had was lack of towels. We left a few for future renters to use!

Stayed 3 nights in Nov 2020

10/10 Excellent

JP K.
Oct 22, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Never wanted to leave!

The house was incredible - big open spaces to hang out. View of the lake and yard make you feel like you're at a private resort. They aren't kidding about the sunset, it is magical. We brought a golf team for a college event here and everyone slept comfortably. Great weekend getaway for anyone! Porch is so peaceful to sip on a hot tea or have breakfast first thing in the morning. Hosts were spot on with everything explained. Hope we can come back some time!

Stayed 2 nights in Oct 2020

Guest reviews

10/10 Excellent

Greg W., Inman
Oct 12, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Guys weekend

Awesome place to hangout with friends and family. Great fishing spot!

Stayed 2 nights in Sep 2020

10/10 Excellent

Joel R.
Oct 6, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

We vacation each fall with family 6 adults 3 children it was great as advertised we will rent agaian

It was great

Stayed 3 nights in Sep 2020

10/10 Excellent

Paige B.
Sep 15, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

A must on Wateree!

The house and location was great. We really enjoyed the beach area. The owners were extremely friendly and accommodating. We would absolutely book another stay!

Guest reviews

10/10 Excellent

stacey s.
Aug 9, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Perfect

Absolutely perfect!!! Couldn't ask for a better place to have a vacation with the family. Thank you for opening up your home to us hope to stay again.

Stayed 3 nights in Jul 2020

10/10 Excellent

Lynn L.
Aug 9, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Ultimate Lakehouse

This lakehouse was in a perfect location. Dock for boat and great depth for swimming (for young and old) . It has its own private beach. The house was clean and well stocked although we brought most everything we needed. Short drive to local restaurants and small stores. You couldn't ask for a better place to vacation. Bring your own tiger paws. There are Gamecocks everywhere!

Stayed 4 nights in Jul 2020

10/10 Excellent

Angela H., Charlotte, NC
Aug 4, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Absolutely Amazing

This is our new favorite spot for cousins weekend. Enough space for everyone & in the perfect location. The marina is just around the corner which made it convenient for our two boats & fun spot to listen to music on our sunset cruise. No boat no problem, sit on the dock, the beach or the porch to watch the sunset & listen to music just across the canal. The owners were great to work with & always available. Thank you again! Can't wait to go back! Angie

Stayed 3 nights in Jul 2020

Guest reviews

10/10 Excellent

Casey V.
Jul 5, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Summer lake vacation

We really enjoyed our stay! The house was great, had lots of room and everything we needed and more. The only issue we had was that the driveway was steep and difficult to get a boat and trailer in and out, other than that it was perfect! Thanks for a great vacation!

Stayed 5 nights in Jun 2020

8/10 Good

john d.
Jul 5, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Vacation review

We enjoyed everything about the property: access to lake, nice play area for kids, large area for adults to enjoy the sunbathing. Hope to be able to return next year.

Stayed 7 nights in Jun 2020

10/10 Excellent

annette g.
Jul 1, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

Family getaway

This is our second stay and we love to come back this summer if they're not booked. Perfect for kids, lots of space indoor and outdoor ! Lovely sunsets. They owners are very nice and accommodating.

Stayed 3 nights in Jun 2020

Guest reviews

10/10 Excellent

annette g.
May 3, 2020

Liked: cleanliness, check-in, communication, location, listing accuracy

View

AmaZIng sunset !

Stayed 3 nights in Apr 2020

10/10 Excellent

Verified traveler
Oct 24, 2019

Liked: cleanliness, check-in, communication, location, listing accuracy

Very nice beautiful view

My family had a very good time enjoy the place very much it was clean we have a beautiful view

10/10 Excellent

Tara P.
Oct 3, 2019

Liked: cleanliness, check-in, communication, location, listing accuracy

The BEST Time!

This place is PERFECT for a large family, several families, or even a weekend girls' trip (like what we did). The location can't be beat. Early morning coffee on the dock, watching the sunset while sipping a beverage on the beach, just a wonderful place.

Stayed 2 nights in Sep 2019

Guest reviews

10/10 Excellent

Tom W.
Oct 3, 2019

Liked: cleanliness, check-in, communication, location, listing accuracy

Comfortable and beautiful setting

The setting is lovely with wonderful views and easy access to the lake. House is comfortable with all the amenities.

10/10 Excellent

Jeff N.
Jul 11, 2019

Liked: cleanliness, check-in, communication, location, listing accuracy

Family Lake Time

This house was perfect for our family lake getaway. The house is beautiful, the views are amazing, there is plenty of dock space for all your toys, and the owners are awesome and accommodating. Would definitely recommend.

Stayed 2 nights in Jun 2019

10/10 Excellent

Daniel B.
Jun 26, 2019

Liked: cleanliness, check-in, communication, location, listing accuracy

Great vacation!

Everything was as advertised. Upstairs is great for kids. Good beach.

Stayed 5 nights in Jun 2019

Guest reviews

10/10 Excellent

Ginger C.
May 7, 2019

Great weekend getaway!

All the comforts of home away from the hustle and bustle of life's demands allowed our family time to regroup and reenergize over the Easter weekend! Hope to return again soon!

Stayed 4 nights in Apr 2019

10/10 Excellent

Amber S.
Apr 28, 2019

Perfect location

Our family had the best time here, the location was perfect. Not too close to town but not too far either. The lake was beautiful and the beach was so perfect to hang out on. Best vacation in years.

Stayed 3 nights in Apr 2019

10/10 Excellent

Phil H.
Apr 18, 2019

Roost

House was great. Very clean. No issues

Stayed 2 nights in Mar 2019

Guest reviews

10/10 Excellent

Kelley D., Rock Hill, SC
Sep 3, 2018

Great Long Weekend!!

We had a great stay in the Roost! Home was well stocked with kitchen items and has everything you need. The beach and dock are awesome! We swam and played all weekend in the water. I would definitely rent this house again. Homeowners are very nice and very responsive. We didn't need anything during our stay but if we had I know they would have helped in any way!

Stayed 3 nights in Aug 2018

8/10 Good

Susan R.
Aug 28, 2018

Great family rental. The kids loved having the upstairs to themselves.

Great house and setting. Our family had a grand time. Would rent again. Just wish it was pet friendly.

Stayed 4 nights in Aug 2018

10/10 Excellent

Bobby P.
May 7, 2018

Home at the lake!

We all did not want to leave! Both kids and adults agreed it was one of the best family trips! You got a little piece of the beach with the sand down at the water. The kids had a blast in the sand and the guys fished day and night off the dock! It was absolutely amazing! The house was beautiful like the pictures and had plenty enough room.

Stayed 2 nights in Apr 2018

Guest reviews

10/10 Excellent

Michael S.
May 5, 2018

Wonderful House!

We stayed here with a large group of people to attend a conference nearby and loved every minute we got to spend at the house! I would definitely recommend this house to anyone looking to stay in the area!

Stayed 2 nights in Apr 2018

10/10 Excellent

sherman b.
Mar 25, 2018

Perfect

Nice folks, nice house

Stayed 28 nights in Feb 2018

This review comes from a trusted partner site and has not been verified.

10/10 Excellent

Kelly C.
Mar 22, 2018

Serenity

Most peaceful vacation we've had in years, pictures don't do this place justice

Stayed 3 nights in Mar 2018

10/10 Excellent

Craig S.
Feb 5, 2018

Great!

We had a great time at the Roost this weekend. Would love to come back this fall for another stay. Pictures do not do this property justice!

Stayed 2 nights in Jan 2018

X Guest reviews

8/10 Good

William W.
Jan 15, 2018

The property was truly gorgeous. We had our extended family over.

Lots of room for guests/ extended family. Good living space layout. Would recommend and rent again ourselves.

Stayed 6 nights in Dec 2017

This review was submitted before 2018 and has not been verified.

10/10 Excellent

Marcel M.
Oct 3, 2017

Lovely Lake house!!!!

Excellent conditions! The house is really awesome and looking better than in the pictures. We were 6 adults and 5 kids and it was plenty of space. All of us were accommodated properly, we have fun swimming, fishing, grilling etc. Two thumbs up for Mr. and Mrs. Jones (the owners) hospitality! We love it and we definitively plan to come again!

Stayed 2 nights in Sep 2017

This review was submitted before 2018 and has not been verified.

10/10 Excellent

Ann T.
Sep 5, 2017

The lake house was lovely. Even better that pictures show.

Peaceful and relaxing! We'd stay here again! Very reasonably priced for the number and quality of accommodations.

Stayed 2 nights in Aug 2017

Guest reviews

This review was submitted before 2018 and has not been verified.

10/10 Excellent

Andrew M.
Sep 5, 2017

Great experience! Better than expected! Amazing sunsets.

Highly recommend this property. Everything right there. Remote but not too far from civilization. Clearly a lake house. Lots of lake-related items and equipment. But, not clear what we were allowed to use (boat, jet ski, float, kayak, canoe, cart,etc.) Also, ants got into several cars. Would be good to warn people to spray around tires to keep ants out of vehicles. Otherwise, had a great time! Thanks again!

Stayed 4 nights in Aug 2017

This review was submitted before 2018 and has not been verified.

10/10 Excellent

Clay C.
Aug 19, 2017

House was wonderful! The pictures didn't do it justice! Amazing location with a great view!

We loved staying at The Roost. The house is beautiful and the property was well kept. The generous sized beach area was wonderful and gave us all a place to play and relax. There is plenty of room for large families like mine. Would definitely consider staying here again!!

Guest reviews

Sep 5, 2017

Great experience! Better than expected! Amazing sunsets.

Highly recommend this property. Everything right there. Remote but not too far from civilization. Clearly a lake house. Lots of lake-related items and equipment. But, not clear what we were allowed to use (boat, jet ski, float, kayak, canoe, cart,etc.) Also, ants got into several cars. Would be good to warn people to spray around tires to keep ants out of vehicles. Otherwise, had a great time! Thanks again!

Stayed 4 nights in Aug 2017

This review was submitted before 2018 and has not been verified.

10/10 Excellent

Clay C.
Aug 19, 2017

House was wonderful! The pictures didn't do it justice! Amazing location with a great view!

We loved staying at The Roost. The house is beautiful and the property was well kept. The generous sized beach area was wonderful and gave us all a place to play and relax. There is plenty of room for large families like mine. Would definitely consider staying here again!!

This review was submitted before 2018 and has not been verified.

10/10 Excellent

Karen L.
Aug 14, 2017

Beautiful spacious lakefront home with immaculate deep water views

This spacious lake front home exceeded expectations for our short Lake Wateree family vacation. The home provided all the amenities needed for a relaxing stay. My 7 year old son caught a catfish, blue gill, and yellow pirch from the two docks on the property. We also enjoyed using the pool table and the cornhole boards during our stay. The family pictures throughout the home added a very special touch... the home creates beautiful family memories for everyone that has the opportunity to spend time here. Kathryn was extremely informative and very responsive! Sadly, the home is up for sale and it doesn't appear that we'll have the opportunity to stay in this lovely home again. I'd love to make future memories for my boys here!

See less

Stayed 3 nights in Aug 2017

1/28



Exterior

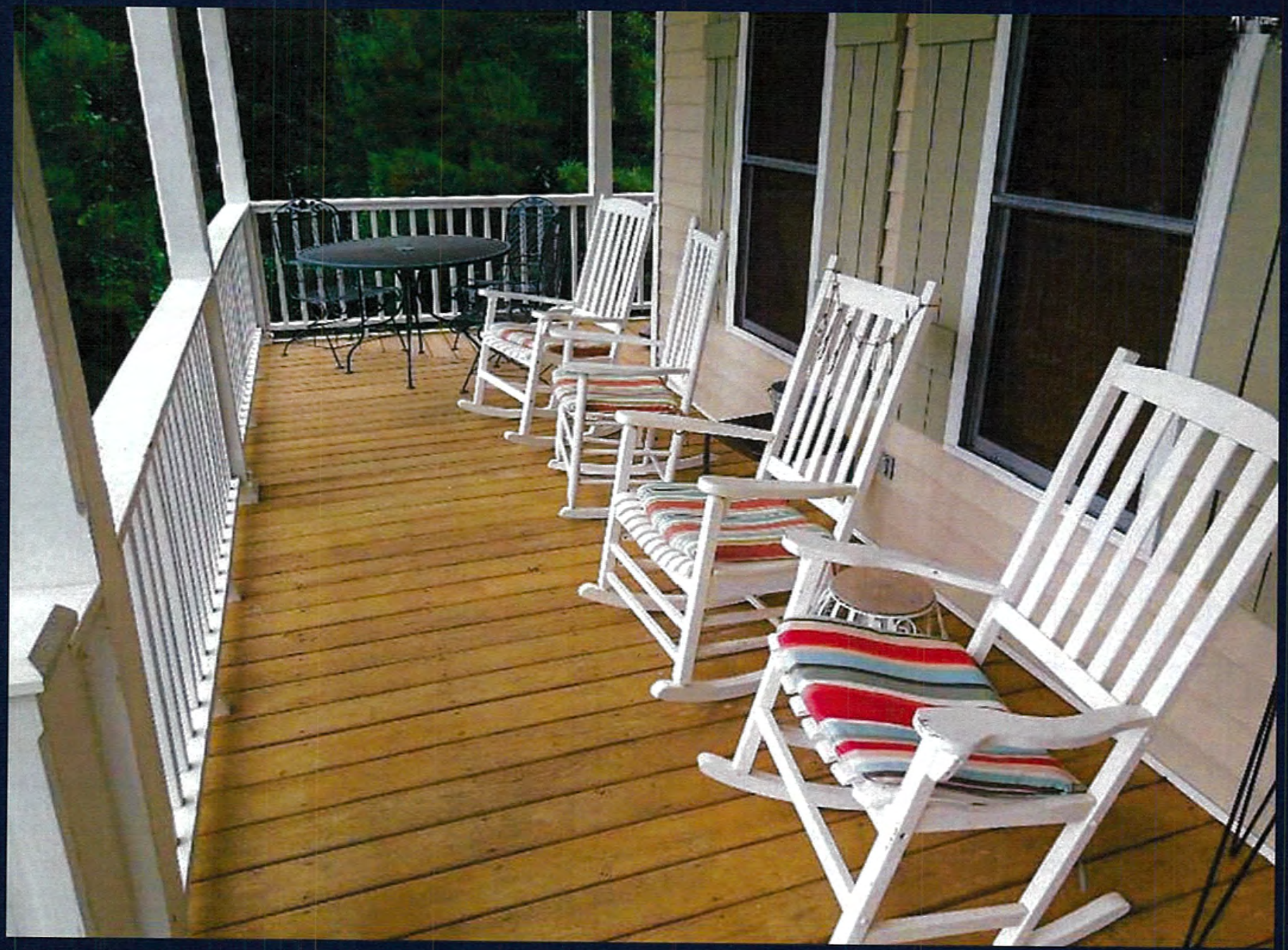
2/28



Exterior

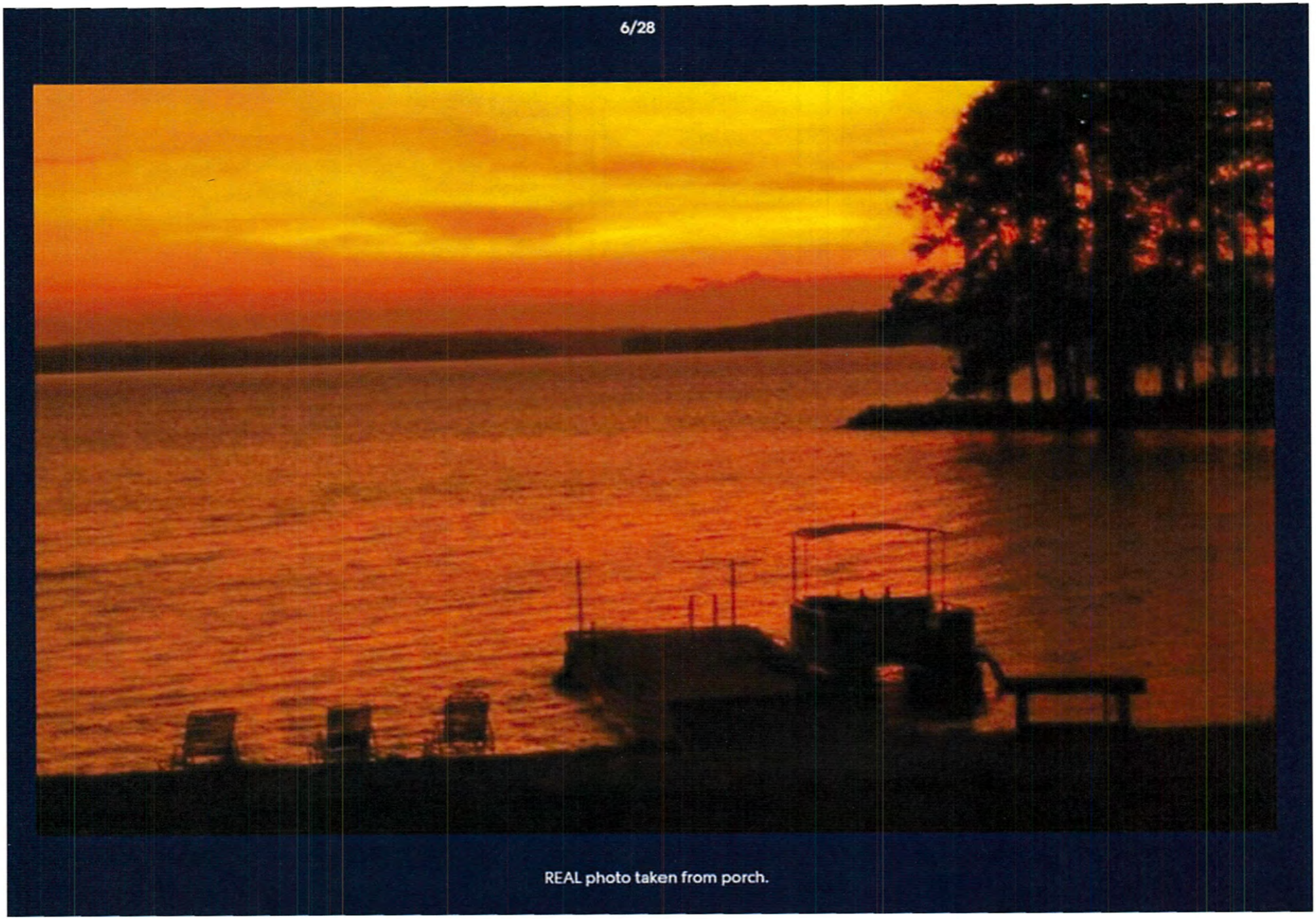


Property grounds



Property grounds

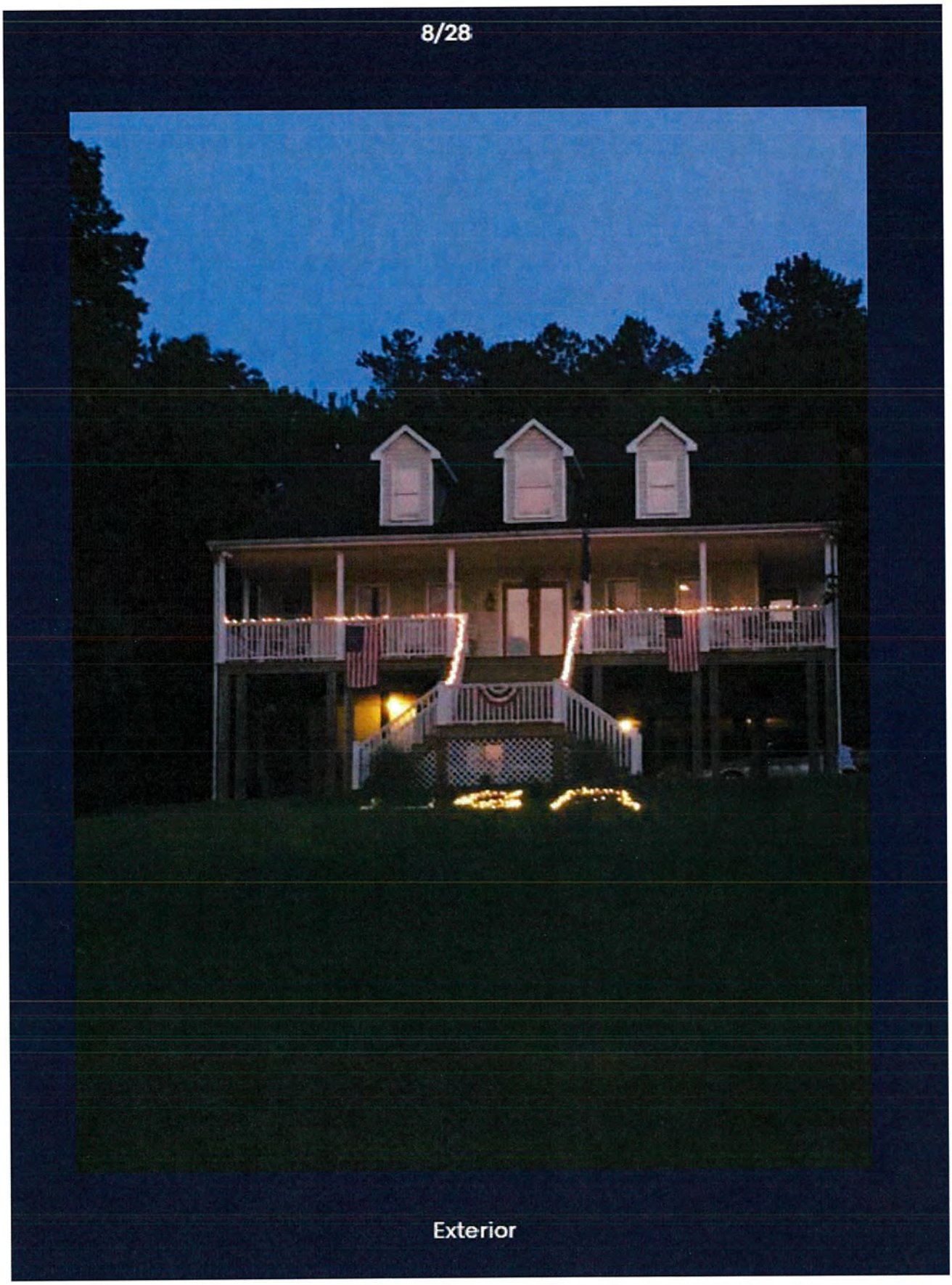

5/28
Real Sunset!


6/28
REAL photo taken from porch.

7/28



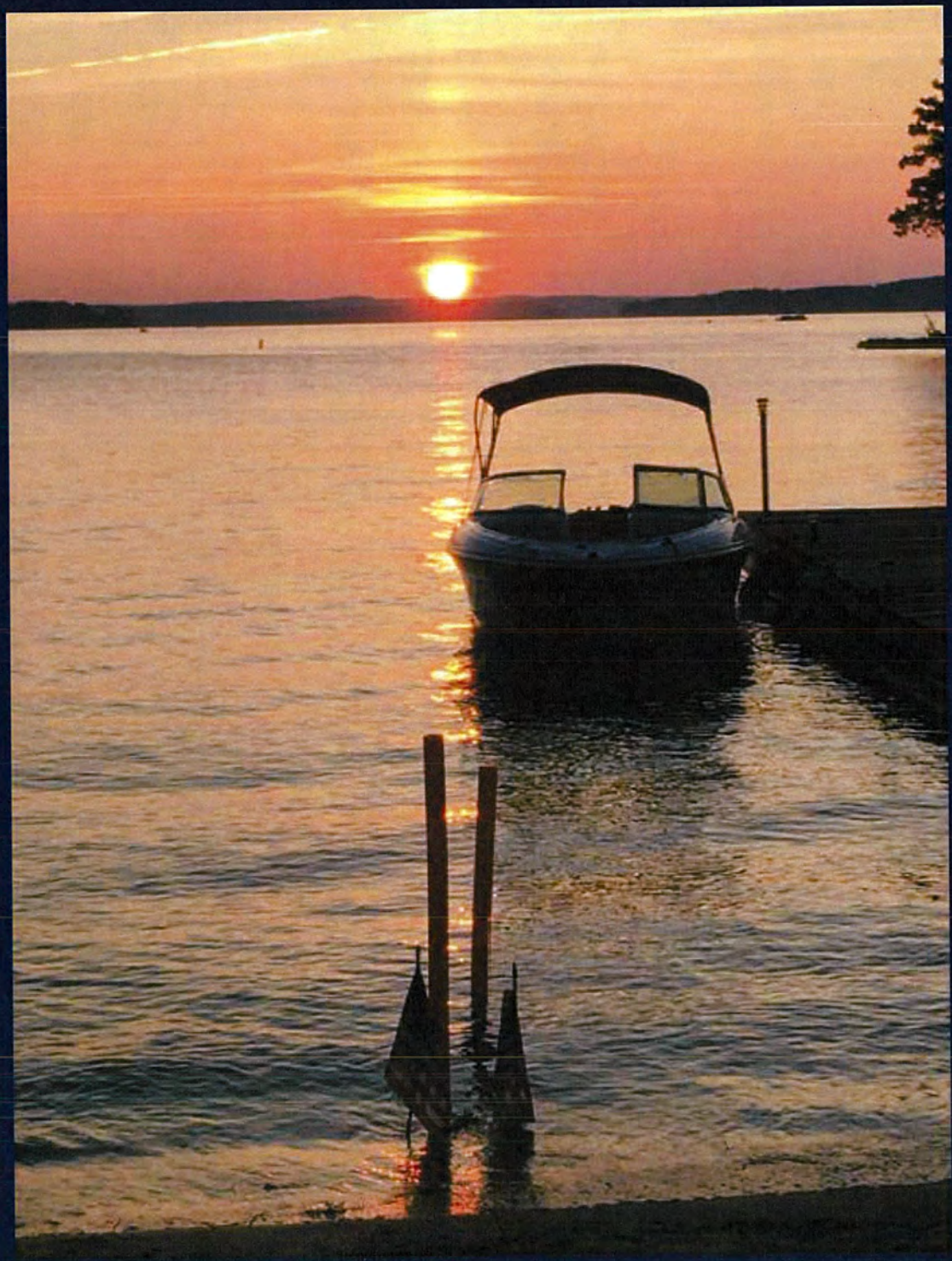
Upstairs Bathroom


8/28
Exterior



Property grounds

10/28



Miscellaneous



Miscellaneous

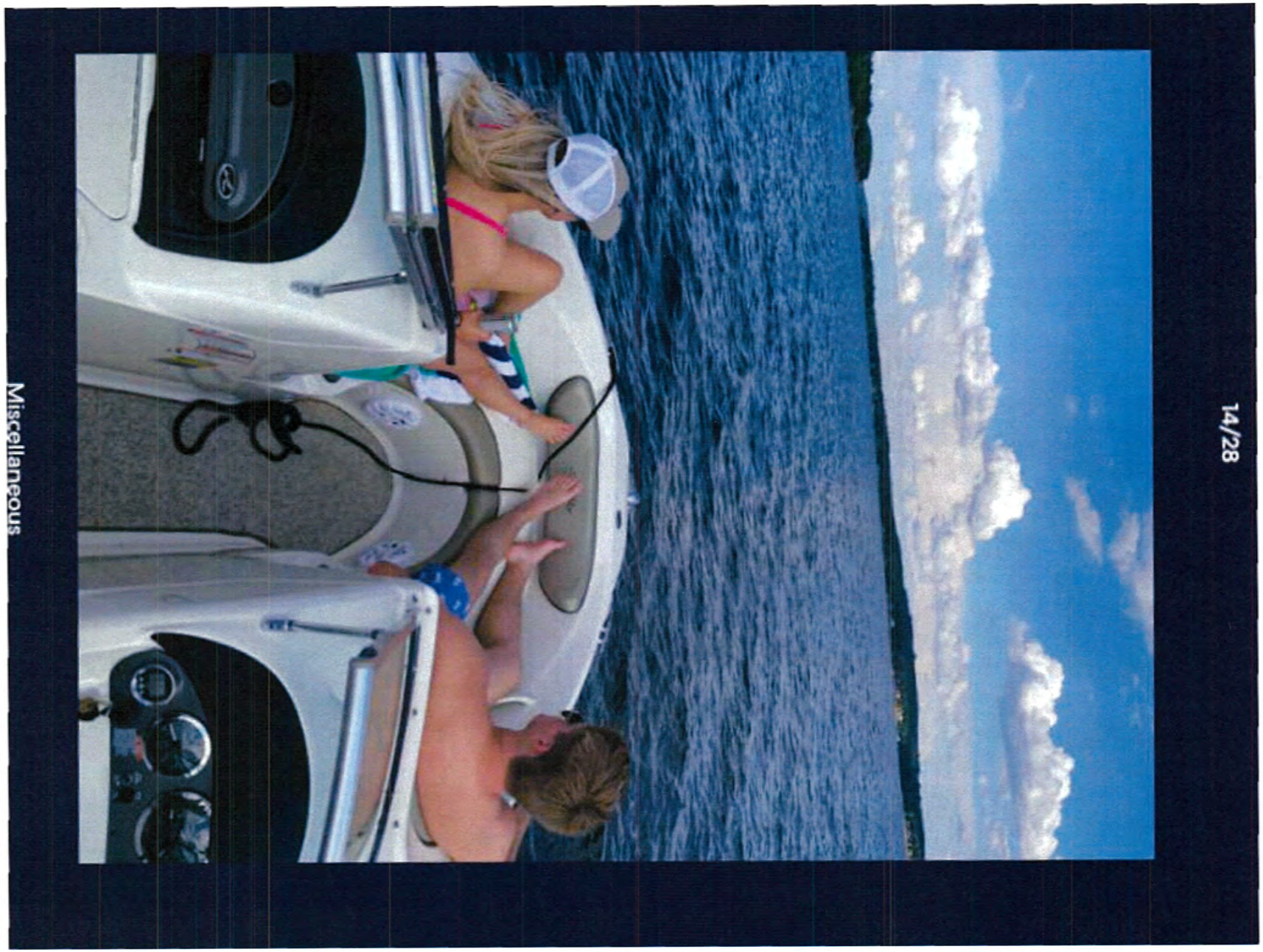


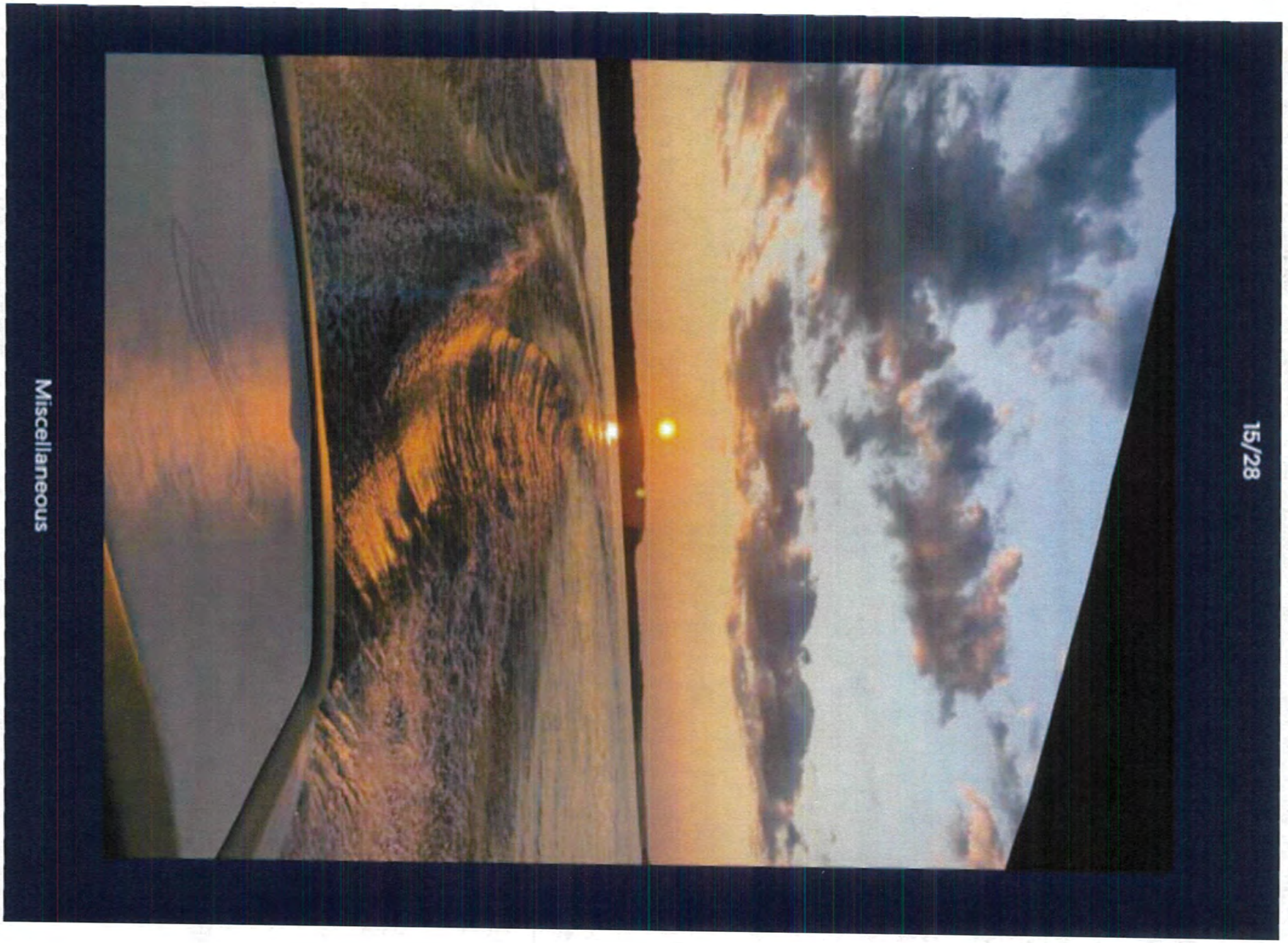
Property grounds



Property grounds

3:24-cv-01281-MGL Date Filed 05/08/26 Entry Number 114-6 Page 62 of 77


Miscellaneous
14/28


Miscellaneous
15/28

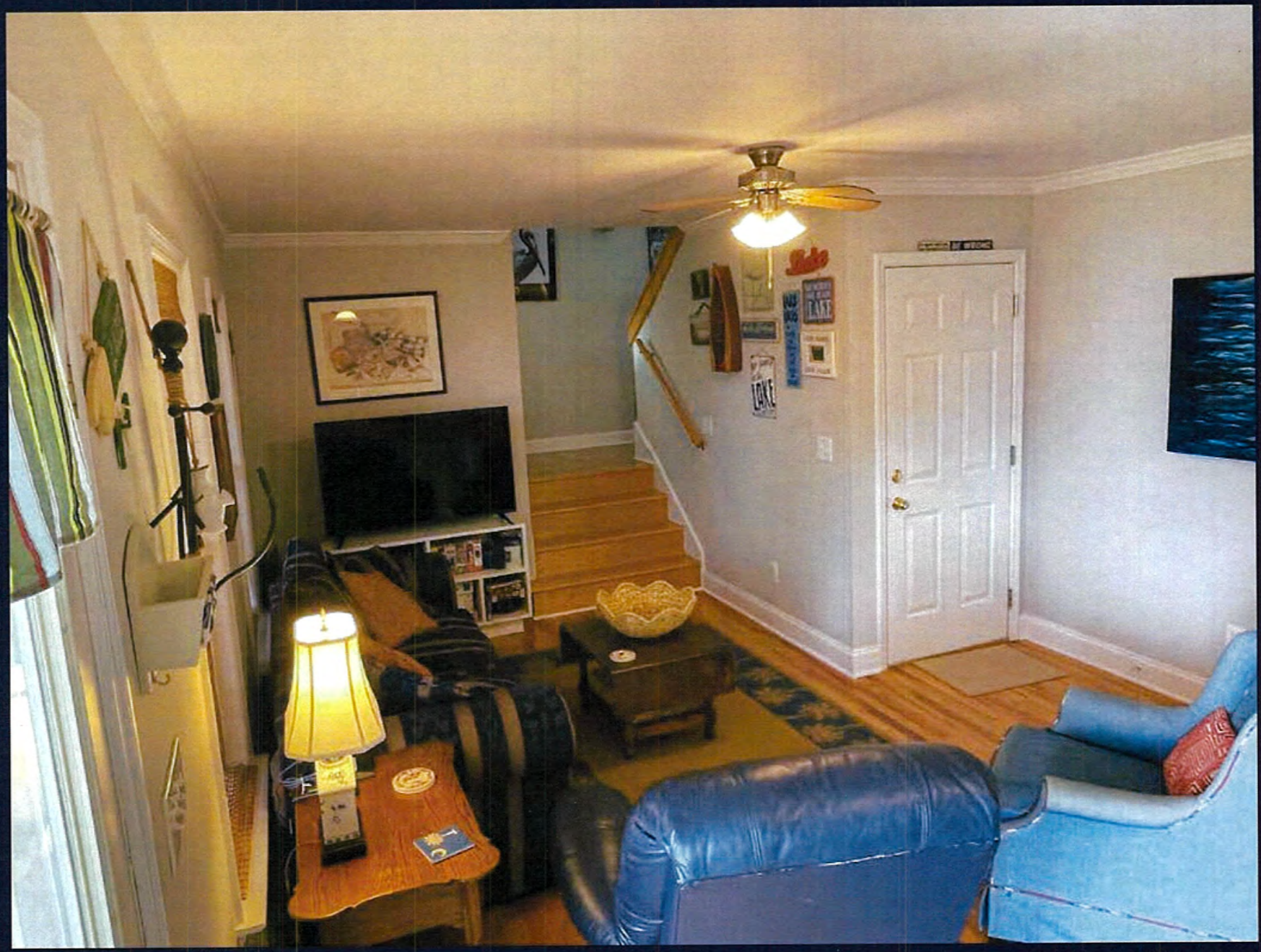


Exterior

17/28

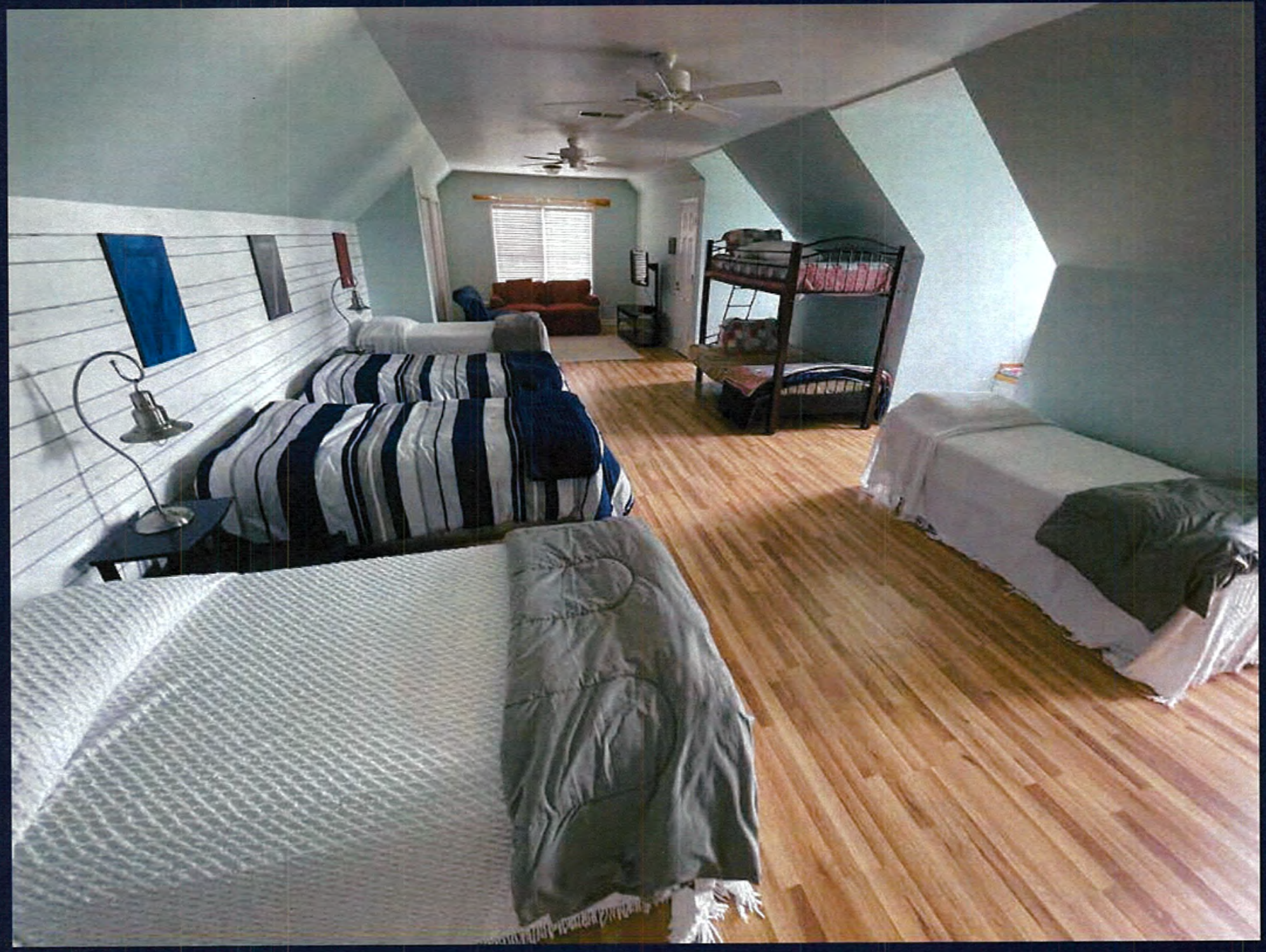


Room



Living area


Beach
19/28



Room



Bathroom



Living area



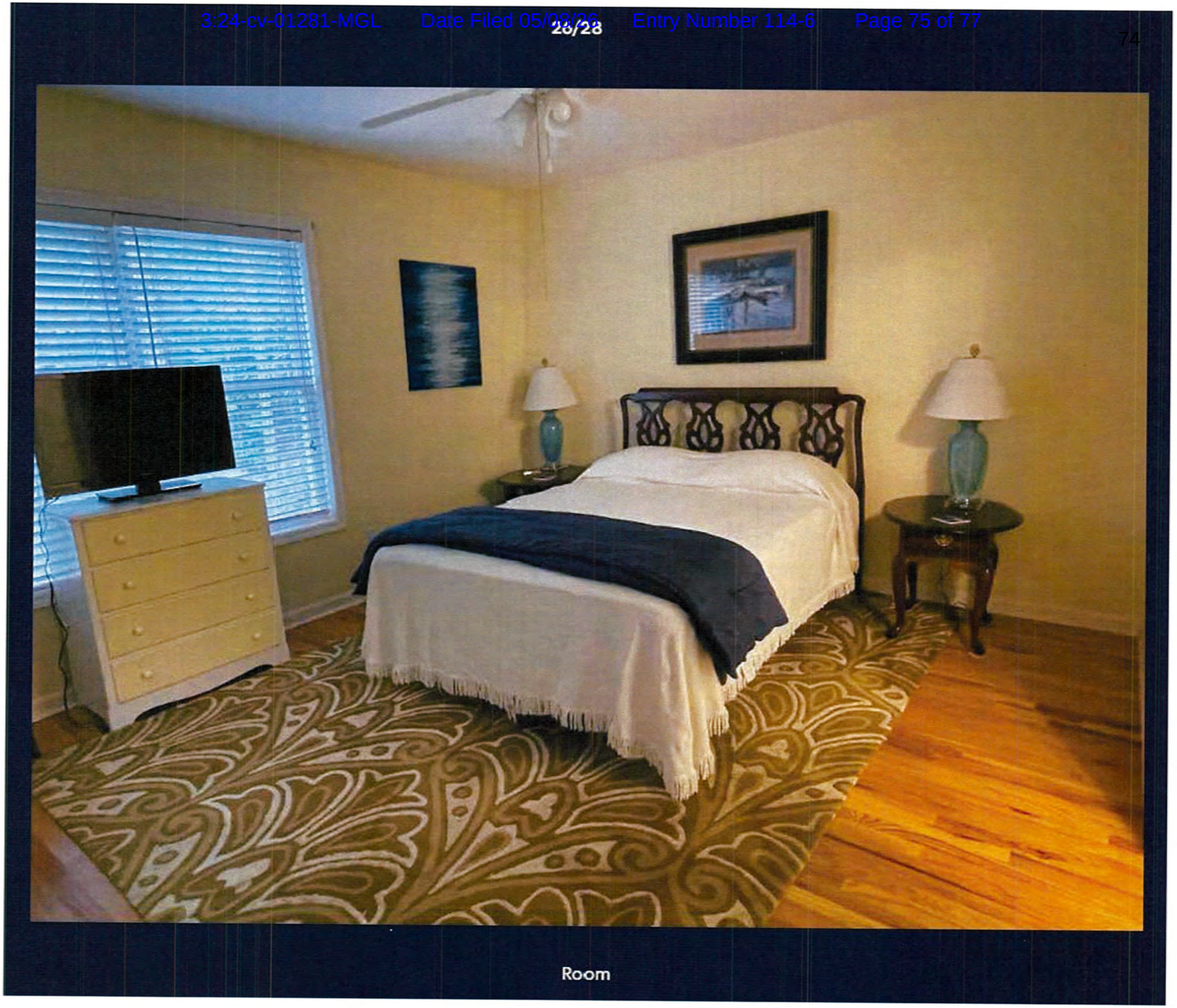
Private kitchen



Room



Room



Room


Bathroom
27/28



Property grounds

Exhibit 37

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Clyde Marcus Jones, II; Dennis Phillips, and Deborah Phillips, on behalf of themselves and all others similarly situated, Plaintiffs, v. Duke Energy Corporation and Duke Energy Carolinas, LLC, Defendants.	Civil Action No.: 3:24-cv-1281-MGL **PLAINTIFFS' RESPONSES TO DEFENDANTS' FIRST REQUESTS FOR PRODUCTION**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Clyde Marcus Jones, II, on behalf of himself and all others similarly situated ("Plaintiff"), hereby respond to Defendants Duke Energy Corporation and Duke Energy Carolinas, LLC (collectively "Defendants") First Set of Requests for Production.

Plaintiffs' responses are based on information currently available to Plaintiff and expressly reserves the right to supplement or modify these responses in the event that additional information becomes available.

GENERAL RESPONSES

The following general responses are incorporated in and made a part of each response set forth below:

1. In responding to each of Defendants' Requests, Plaintiff has conducted a thorough and reasonable search of its records and files where responsive documents are most apt to be found, including but not limited to electronically stored information that is reasonably accessible. Plaintiff has produced or is producing herewith all non-privileged and responsive

documents resulting from this thorough and reasonable search. Plaintiff has not logged privileged communications with the undersigned attorneys.

2. Plaintiff has endeavored not to produce any privileged or protected documents responsive to these Requests. In the event that any privileged or protected document has been produced, such production was unintentional and inadvertent and should not be construed as a waiver of the applicable privilege or protection.

3. Plaintiff expressly reserves and does not waive the right to object to the relevancy, authenticity, competency, and/or admissibility of any documents which have been or will be produced in response to any of Defendants' Requests.

4. Plaintiff reserves the right to modify, supplement, clarify, or amend these responses as discovery in this matter continues.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

Produce all Documents identified, referenced, referred to, or relied upon by You in responding to Defendants' First Interrogatories.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, and duplicative, as it seeks "all Documents" identified, referenced, or relied upon in response to 23 separate interrogatories, many of which seek information not within Plaintiff's possession, custody, or control. Plaintiff further objects to the extent this request seeks expert materials not yet disclosed, or privileged communications protected by the attorney-client privilege or work product doctrine. Subject to and without waiving any objection, should Plaintiff withhold any document on the basis of privilege, same will be identified in a

REQUEST FOR PRODUCTION NO. 30

Produce any Documents sufficient to Identify the existence of any lien or easement on the Property.

RESPONSE: Plaintiff would refer Defendant to the Title to Real Property, produced herewith, which provides Duke Energy with the right to ingress and egress over the subject property.

REQUEST FOR PRODUCTION NO. 31

Produce any photographs, videos, maps, plats, drawings, blueprints, or other renderings of the Property, including photographs and videos sufficient to show the interior and exterior of the Property.

RESPONSE: Plaintiff has produced and produces herewith documents in his possession responsive to this request.

REQUEST FOR PRODUCTION NO. 32

Produce any Documents describing any Tests for PCBs or other contaminant in water, soil, air, or other environmental source located at, on, under, or anywhere adjacent to the Property, including for each Test the entity that conducted it, when it was conducted, where it was conducted, and the results of each test or inspection.

RESPONSE: Plaintiff objects to this request because it is overbroad, unduly burdensome, and seeks documents not limited in time or scope. The request also seeks technical and scientific materials that may not be within Plaintiff's control, particularly where testing was conducted by third parties or regulatory agencies. Plaintiff further objects to the extent this request seeks expert-related materials or environmental testing data that are not yet due under Rule 26(a)(2) and any forthcoming scheduling order. Subject to and without waiving any objection, other than remediation performed as a result of flooding (said documents

produced herewith) Plaintiff is not currently in possession of information responsive to this request but reserves the right to supplement and/or modify this request as discovery in this matter continues, and consistent with the Court's scheduling order in this case.

REQUEST FOR PRODUCTION NO. 33

Produce all Documents reflecting any monetary damage or diminution of value of the Property as a result of PCBs allegedly located at, on, under, or anywhere adjacent to the Property.

RESPONSE: Plaintiff objects to this request because it is overly broad, unduly burdensome, and not proportional to the needs of the case. The request seeks "all Documents" without limitation as to time and scope and includes vague and undefined terms such as "reflecting" and "adjacent to the Property." Plaintiff further objects to the extent that the calculation of monetary damages is premature. Plaintiff reserves the right to supplement and/or modify this response as discovery continues and consistent with the Court's scheduling order in this case.

REQUEST FOR PRODUCTION NO. 34

Produce all Documents related to any interference with, interruption of, or prevention of Your use or enjoyment of the Property as a result of PCBs allegedly located at, on, under, or anywhere adjacent to the Property, including from any water, soil, air, or other environmental source.

RESPONSE: Plaintiff objects to this request because Defendants intend to limit or otherwise preclude Plaintiff from introducing categories of damages or from allowing a jury to determine the value of the damages. Subject to and without waiving any objection, Plaintiff refers Defendant to the fish consumption advisories issued by the South Carolina Department of Environmental Services f/k/a the South Carolina Department of Health and Environmental Control ("DES"), and similar DES literature.

neighborhood, or homeowners' association is not material to the allegations of PCB contamination, property rights infringement, or damages asserted in the operative complaint. Subject to and without waiving any objection, Plaintiff is a member of the Wateree Homeowner's Association and the Wateree Sailing Club, and will search for documents pertaining to his membership in both.

REQUEST FOR PRODUCTION NO. 41:

Produce all Documents or Social Media posts originating from or mentioning any Plaintiff and relating to water contamination, soil contamination, PCBs, Lake Wateree, or any Defendant in the Action.

RESPONSE: Plaintiff objects to this request to the extent that this request is overly broad and seeks information beyond Plaintiff's possession or reasonable control. Plaintiff cannot be certain that he possesses "all documents or social media posts." Subject to but without waiving any objection, Plaintiff has made no social media posts regarding the matters set forth above, and, further, is not aware of any post responsive to this request.

Respectfully submitted,

WYCHE, P.A.

s/Jessica L. Fickling
Jessica L. Fickling (Fed. ID No. 11403)
Jim May (Fed. ID No. 11355)
M. Lucy Dinkins (Fed. ID No. 11961)
P.O. Box 12247
Columbia, SC 29211-2247
P: (803) 254-6542
jfickling@wyche.com
jmay@wyche.com
ldinkins@wyche.com

SAVAGE, ROYAL & SHEHEEN, LLP

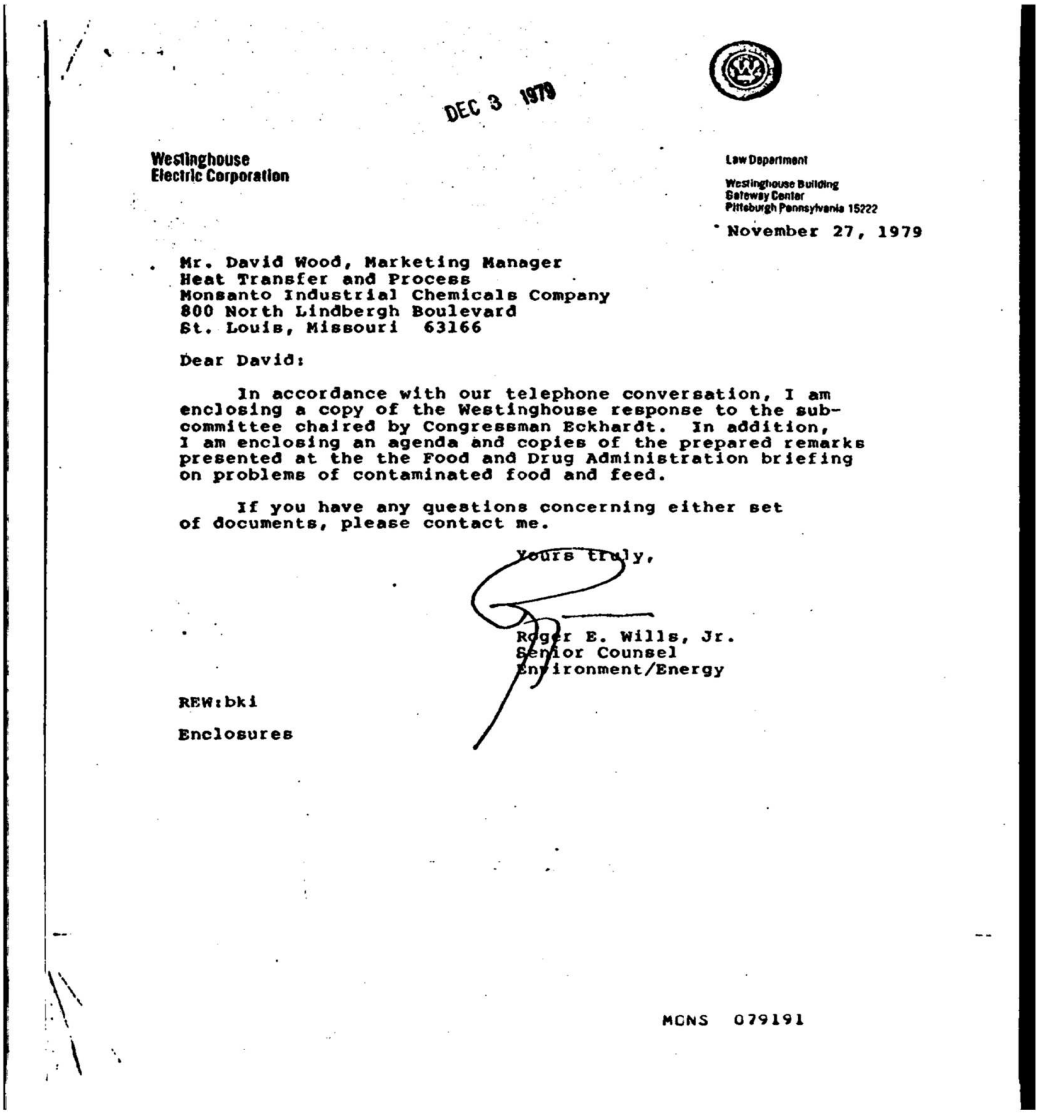
Vincent A. Sheheen (Fed. ID No. 7016)
Austin M. Sheheen (Fed. ID No. 13938)
P.O. Drawer 10
Camden, S.C. 29021
P: (803) 432-4391
vsheheen@thesavagefirm.com
asheheen@thesavagefirm.com

SPEIGHTS & SOLOMONS, LLC

A. Gibson Solomons, III (Fed. ID No. 7769)
Post Office Box 685
Hampton, SC 29924
P: (803) 943-4444
gsolomons@speightsandsolomons.com
Attorneys for Plaintiffs

October 3, 2025

Exhibit 38



DEC 3 1979

Westinghouse
Electric Corporation

Law Department
Westinghouse Building
Gateway Center
Pittsburgh Pennsylvania 15222

November 27, 1979

Mr. David Wood, Marketing Manager
Heat Transfer and Process
Monsanto Industrial Chemicals Company
800 North Lindbergh Boulevard
St. Louis, Missouri 63166

Dear David:

In accordance with our telephone conversation, I am enclosing a copy of the Westinghouse response to the sub-committee chaired by Congressman Eckhardt. In addition, I am enclosing an agenda and copies of the prepared remarks presented at the the Food and Drug Administration briefing on problems of contaminated food and feed.

If you have any questions concerning either set of documents, please contact me.

Yours truly,

Roger E. Wills, Jr.
Senior Counsel
Environment/Energy

REW:bki

Enclosures

MONS 079191

Westinghouse
Electric Corporation

Transmission and Distribution

J D Campbell
Vice President
Transformer Divisions

Westinghouse Building
Gateway Center
Pittsburgh Pennsylvania 15222

November 8, 1979

The Honorable Bob Eckhardt
Chairman, Subcommittee on Oversight
and Investigations
The United States House of
Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

Westinghouse Electric Corporation is pleased to have this opportunity to cooperate in your inquiry into the potential health hazards posed by Polychlorinated Biphenyls and the Environmental Protection Agency's implementation of the ban on the manufacturing, distribution and use of PCBs.

As requested in your letter, dated October 24, 1979, we are providing the following answers to your questions in the order presented:

1. Westinghouse Electric Corporation manufactured PCB transformers using the trade name "Inerteen." Westinghouse announced on July 15, 1976, that it would end production of Inerteen-filled transformers in December 1976. Westinghouse actually shipped the last Inerteen transformers in early to mid-1977.

Westinghouse ceased the manufacturing of Inerteen transformers when rules were proposed by the U.S. EPA under Sections 307(a) and 311 of the Federal Water Pollution Control Act Amendment of 1972. In addition, the sole U.S. supplier announced its intention to cease the manufacture of PCBs and the U.S. Senate included within the bill for the Toxic Substances Control Act a provision for the elimination of PCBs.

2. Westinghouse manufactured both mineral oil-filled and Inerteen-filled transformers. Our customers specified the type of dielectric fluid required in particular applications but separate lists distinguishing the two types of transformers were not maintained.

MONS 079192

However, Westinghouse did utilize the word "Inerteen" on the transformer nameplate and after 1970 has used an additional nameplate recommending extreme care in the handling of the transformer (Attachment 1). Moreover, Westinghouse supplied an instruction book containing recommendations for the handling and disposal of Inerteen and Inerteen transformers (Attachment 2).

Westinghouse learned in 1976 that PCBs were unintentionally present in some mineral oil transformers. After an investigation, Westinghouse notified its customers of this possibility and suggested that mineral oil-filled transformers be checked for PCB content when performing repair, routine maintenance or disposal (Attachment 3). In addition, Westinghouse issued a press release to four trade publications concerning this situation (Attachment 4). When final EPA rules published May 31, 1979, did not require testing of mineral oil-filled transformers, Westinghouse notified those customers who received transformers filled with mineral oil during the 1976 period when PCB tests of its oil-filling system indicated the possibility of the presence of PCBs in excess of 500 ppm that 40 CFR 761 should be consulted for the applicable options or actions available with respect to these transformers (Attachment 5).

3. After Westinghouse ceased the manufacture of Inerteen transformers, equipment used in their manufacture was decontaminated and tested to insure that the decontamination procedures were effective.

4. Prior to April 1978, Westinghouse utilized licensed chemical waste landfills or licensed high temperature incinerators for disposal of contaminated solids and liquids. Subsequent to April 1978, solid wastes have been shipped to EPA permitted PCB landfills. However, since the U.S. EPA has not issued a permit to a commercial high temperature incinerator, PCB liquids are being stored in accordance with the requirements of 40 CFR 761.

5. Westinghouse has long maintained an active industrial hygiene program and has utilized available information to insure that employes are protected (Attachment 6).

MONS 079193

6. The standard transformer dielectric fluid is mineral oil. Westinghouse also manufactures some types of transformers filled with silicone or a high temperature hydrocarbon fluid when specified by the purchaser for an application where a fire resistant fluid is needed. Because neither silicone nor high temperature hydrocarbon fluids have fire resistant properties equal to Inerteen Westinghouse is continuing research on other dielectric fluids.

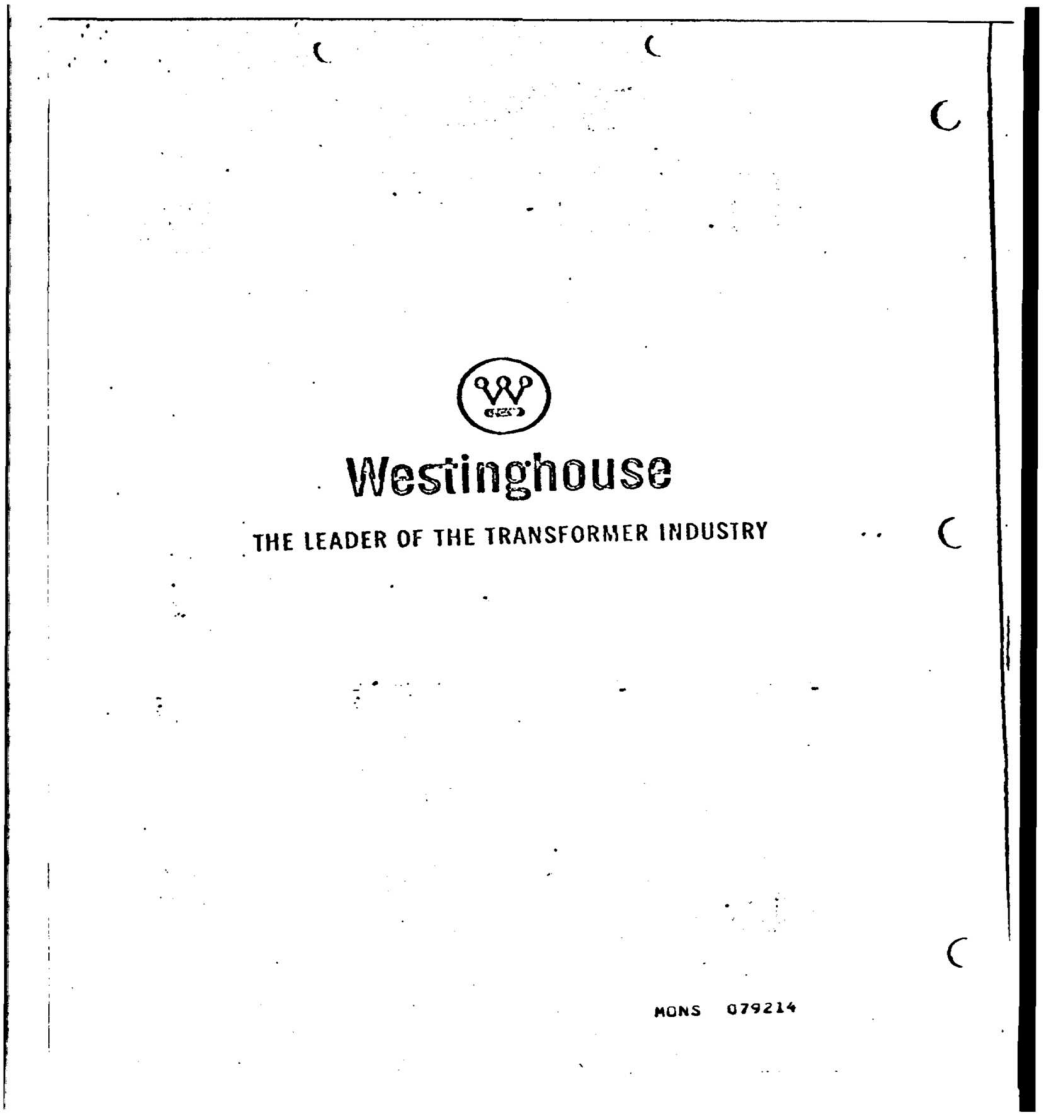
7. Westinghouse has facilities which service transformers in accordance with 40 CFR 761 and a petition for exemption from the PCB ban rules. Westinghouse does not rebuild, in accordance with 40 CFR 761, PCB transformers.

If you desire any further information please contact me.

Sincerely,

J. O. Campbell

MONS 079194


Westinghouse
THE LEADER OF THE TRANSFORMER INDUSTRY
MONS 079214

ATTACHMENT 3

ghouse Electric Corporation

Westinghouse Building
Gateway Center
Pittsburgh Pennsylvania 15222

November 22, 1976

TO INDUSTRY PURCHASING EXECUTIVES

Since the late 1930's, the electrical industry has manufactured apparatus using askarels (which contain polychlorinated biphenyls, or PCB's) as a coolant and insulating fluid, and apparatus using mineral oils. Users have characteristically specified PCB's for use in installations where a high degree of fire resistance is required.

In late 1970 studies began to indicate that PCB's had a tendency to persist and accumulate in the environment. Since that time, Westinghouse has attached an additional identifying label to each askarel-filled transformer sold.

As a result of recent investigations, we have determined that some oil-filled transformers may contain varying concentrations of PCB's.

There is no operating problem with transformers that may have PCB's mixed with mineral oil. The electrical characteristics remain basically unchanged.

Currently there are no nationally established standards for allowable levels of PCB's in oil for closed electrical systems. A number of states have recently enacted legislation providing for special reporting, labeling and/or disposition of PCB's. Because legislation varies in different states, it is suggested that customers institute any special procedures which may be required for conformance.

In addition, when performing repair, routine maintenance or disposal, oil-filled transformers should be checked for the presence of PCB's. We also suggest that you check your own transformer oil storage and handling systems for possible presence of PCB's.

In order to determine the extent of the presence of PCB's in oil-filled environments, the National Electrical Manufacturers Association (NEMA) has commissioned a study by a special task force. This study could include electrical apparatus as well as oil-storage and transportation facilities.

D. P. Keiser

D. P. Keiser
Marketing Manager
Transmission and Distribution Group

MONS 079215

ATTACHMENT 4

This news release was mailed November 24 to the following four publications:

Electrical Construction & Maintenance
Electrical Contractor
Industrial Maintenance & Plant Operation
Plant Engineering

Contact: J. P. Daley
Telephone: (412) 255-3363

FOR USE: At Will

PITTSBURGH, Nov. 24 -- Since the late 1930's, the electrical industry has supplied transformers using askarels which contain PCB's (polychlorinated biphenyls) for use in installations where a high degree of fire resistance is required, such as schools, hospitals and high-rise buildings. In addition, major applications of PCB's were carbonless paper, fire resistent hydraulic fluids, heat transfer fluids and plasticizers. Moreover, capacitors containing PCB's are used in fluorescent lighting ballasts, air conditioning compressors, and television receivers.

In late 1970 studies began to indicate that PCB's had a tendency to persist and accumulate in the environment. Since that time, Westinghouse has attached an additional identifying label to each PCB-filled transformer shipped.

Westinghouse said recent tests it has conducted indicate that some oil-filled transformers may contain varying concentrations of PCB's.

The company said the presence of PCB's in mineral oil does not affect the performance of the transformers.

- more -

MONS 079216

Currently there are no nationally established standards for allowable levels of PCB's in oil for closed electrical systems. A number of states have recently enacted legislation providing for special reporting, labeling and/or disposition of PCB's. Because legislation varies in different states, it is suggested that customers institute any special procedures which may be required for conformance.

In addition, when performing repair, routine maintenance or disposal, oil-filled transformers should be checked for the presence of PCB.

On November 8, the National Electrical Manufacturers Association (NEMA) commissioned a special task force to study the possibility that PCB's may be present in detectable quantities in oil-filled electrical apparatus and oil-storage systems for electrical insulating oil.

##2610-71##

-1176-

MONS 079217

Exhibit 39

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Clyde Marcus Jones, II, on behalf of himself and all others similarly situated,

Plaintiffs,

vs. Case No. 3:24-cv-01281-MGL

Duke Energy Corporation and Duke Energy Carolinas, LLC,

Defendants.

VIDEOTAPED TELECONFERENCE
DEPOSITION OF: DEBORAH PHILLIPS
DATE: Friday, March 27, 2026
TIME: 11:20 a.m.
TIME ENDED: 12:54 p.m.
LOCATION: AC Hotel
225 West Main Street
Spartanburg, South Carolina
REPORTED BY: YVONNE R. THURSTON-BOHANNON
Registered Merit Reporter,
Certified Realtime Reporter

there, were there a lot of people there using and enjoying Lake Wateree?

A. From time to time. It depended on the time of the day and the day. Sometimes yes, there were a lot of people there. Sometimes no.

Q. So there were times, though, that there were a lot of people out there using and enjoying the lake; is that fair?

A. That's fair.

Q. How long did it take to get from your property in Gaffney to the property at Lake Wateree?

A. Roughly an hour and a half.

Q. When you all bought the property in 2014 until you sold it, did you all ever have any significant improvements to the property or renovations, additions, et cetera? Did you do anything significant?

A. We did some work on the dock. We painted somewhat, and we had to put some things in the house, furniture and whatnot. We had to repair some things. That's about it.

Q. No major renovation?

A. No. Uh-uh.

Q. Okay. In terms of your time there,

were there times that in your opinion you were able to use and enjoy the property?

A. Yes, we did have enjoyment.

Q. And during those times were there ever times when you had enjoyment there with your family there and in watching them -- the grandchildren play in the water, that's something that you enjoyed; is that fair?

A. It was -- it was -- they didn't get to come often.

Q. But when they did, were you able to use and enjoy -- I mean, were you able to enjoy --

A. On those rare occasions, yeah. Yes.

Q. And how often did your children come?

A. My daughter did not like to come. She -- she had -- it was just a busy time in her life, and so they may come -- she didn't come. But, now, our son-in-law and the other two grandchildren may be able to come once a year, but maybe not. It's -- they didn't use it very much. Our son would come more often, but that might have only been I would say maybe four times a year. Just he couldn't get there either, and the more children they had, the more locked down they were.

Q. Why did you decide to sell the

to still pay $635,000 for your property after being informed in this disclosure form about the fish advisories; is that right?

A. Yes.

Q. And this disclosure about the fish advisories did not cause the purchasers to change their mind and refuse to buy the property, did it --

MR. SHEHEEN: Object to form.

BY MR. DUNLAP:

Q. -- did it?

A. I'm -- I'm assuming not.

Q. And since you all have owned the property, have the purchasers complained to you all in any way about the issues -- any issues since they bought the property?

A. They have not.

Q. And that means the purchasers have never reached out to you all since they bought the property and indicated that they were unable to use and enjoy the property, did they?

A. They have not.

Q. And the purchasers have never reached out to you all since they bought the property and complained about any PCB issues, have they?

CERTIFICATE OF REPORTER

I, Yvonne R. Thurston-Bohannon, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public for the State of South Carolina at Large, do hereby certify:

That the reading and signing of the foregoing deposition by the witness is waived.

That the foregoing transcript was taken before me on the date and at the time and location stated on page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal April 1, 2026, at Columbia, Richland County, South Carolina.



Yvonne R. Thurston-Bohannon
Registered Merit
Reporter, CRR
My Commission expires
May 14, 2035

Exhibit 40

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Clyde Marcus Jones, II, on behalf of himself and all others similarly situated,

Plaintiffs,

vs. Case No. 3:24-cv-01281-MGL

Duke Energy Corporation and Duke Energy Carolinas, LLC,

Defendants.

VIDEOTAPED TELECONFERENCE

DEPOSITION OF: DENNIS PHILLIPS

DATE: Friday, March 27, 2026

TIME: 9:21 a.m.

TIME ENDED: 11:17 a.m.

LOCATION: AC Hotel
225 West Main Street
Spartanburg, South Carolina

REPORTED BY: YVONNE R. THURSTON-BOHANNON
Registered Merit Reporter,
Certified Realtime Reporter

A. Yes.
Q. And did you also swim any?
A. Yes. I did.
Q. And so you would have swam there off the dock, right?
A. Yes.
Q. And as the property went down to the water, was it grad -- a gradual slope going down?
A. Yes.
Q. And so you could walk directly into the water --
A. Yes.
Q. -- if you wanted to without getting on the dock?
A. Yes.
Q. And so you would swim every summer that you owned the property?
A. Maybe. I didn't swim much. I didn't. I'm too old.
Q. Okay. And then -- well, let -- let me back up.

Do you have children?
A. I do.
Q. Okay. And how old are they?
A. 42 and 40.

A. That's correct.
Q. And what -- what kind of fish did you catch?
A. Crappie, catfish. Crappie, however you pronounce it.
Q. How often would you go out in the times that you were down there? Ten times a year? 15 times a year?
A. No. Maybe three or four times a year.
Q. Okay. And when you went out and you did that, did you catch and release or did you take -- take the fish back?
A. I usually gave the fish away.
Q. Who would you give it to?
A. My neighbor.
Q. And what was your neighbor's name?
A. Shane and -- Varnadore.
Q. And --
A. But I -- go ahead.
Q. No, sir, you go ahead.
A. I kept some too. Not much. I didn't have much success, but --
Q. Did you eat any of the fish?
A. I did.
Q. And did your neighbors eat the fish

A. Yes.
Q. And there were -- you and your family have some wonderful lifetime memories at Lake Wateree; is that fair?
A. Yes, sir.
Q. You were glad you bought the property and were able to use and enjoy it for all those years; is that fair?
A. Yes, sir.
Q. And some of your cherished family memories are probably with you and your family and also with your golfing buddies when you all were using and enjoying the property; is that right?
A. Yes. Yes, sir.
Q. And I believe you indicated that you and your family would enjoy some of the holidays there at Lake Wateree? Like you would be there on July 4th and enjoy the fireworks display from your dock; is that fair?
A. Yes.
Q. And there were some Memorial Days, Labor Days that you all would have been there; is that fair?
A. Yes.
Q. And you would used and enjoyed the

property at that time; is that fair?
A. Yes.
Q. And you would have enjoyed the fireworks display July 4th at Lake Wateree; is that fair?
A. Yes.
Q. And you would have enjoyed using the property and enjoying the property on Memorial Day and Labor Day with your family; is that fair?
A. Yes.
Q. And when you were doing this, when you were using and enjoying the property during these holiday events and -- like July 4th, there would have been thousands of other people using and enjoying Lake Wateree at that time; is that fair?
A. Yes, there were people -- people there. I don't know how many, but --
Q. Lots and lots --
A. -- there was a good many people there on the 4th, yes.
Q. Okay. And that would be true Memorial Day and Labor Day, the summer --
A. Yes.
Q. -- holidays?
They would have been using and enjoying

realtor nor the prior owners mentioned anything to you about that?

A. Not at the time.

MR. SHEHEEN: Object to form.

THE WITNESS: No.

BY MR. DUNLAP:

Q. Okay. So we're in -- we're in 2014 and you buy the property and you pay $283,000 which you financed with a lender to buy the property at Lake Wateree. Is that how we started out here initially?

A. Correct.

Q. How long did you look before you decided on this property?

A. Maybe two weeks.

Q. Were you excited to try to find a place there?

A. You bet.

Q. It's a nice break from the construction, right?

A. You bet.

Q. And so you owned the property until -- you actually sold it in May of 2025; is that right?

A. That's right.

Q. And you listed the property prior to

that sale in around December of 2024; is that right?

A. I -- I --

Q. Is that your memory?

A. The best of my memory.

Q. And you sold it for $635,000; is that right?

A. That's correct.

Q. And that was over twice what you bought it for; is that right?

A. Yes.

Q. And you were pleased with that price; is that right?

A. I wouldn't go that far.

Q. Did you ever tell anyone that you were happy with the price that you received for the property?

A. Not to my knowledge. I didn't tell them I was unhappy, but I didn't tell them I was a hundred percent pleased, so...

Q. But it was over twice what you paid for it?

A. It was.

Q. Why did you decide to sell the property?

Q. Okay. Just depended on how much you caught?
A. How much -- just what little bit.
Q. And for those did you keep some of those to consume?
A. I usually didn't. I was too lazy to clean them most of the time, so...
Q. And so you -- you were giving them away or -- or release them, one of the two?
A. Release them or give them away, and I would eat some for sure.
Q. Which fish do you like to eat the most?
A. Crappie.
Q. You testified earlier that you fished some from your dock and that you also would go out in the boat, right?
A. Correct.
Q. When you went out in I believe the bass boat --
A. Right.
Q. -- where would you go the most?
A. At Lake Wateree?
Q. Yes.
A. Usually up toward Cedar Creek.
Q. The fish advisory that was in place at

Lake Wateree did not impact how often you fished, did it?

A. No.

Q. It was not a factor?

A. No.

Q. And the fish advisory at Lake Wateree did not impact how often you engaged in water activities like boating, kayaking, swimming --

A. No.

Q. -- canoeing, whatever? Okay.

MR. DUNLAP: Okay. Let's do this. Let's take about a five-minute break.

MR. SHOEMAKE: Sure.

THE VIDEOGRAPHER: The time on camera is approximately 10:44 a.m. We are off the record.

(A recess transpired.)

THE VIDEOGRAPHER: The time on camera is approximately 10:59 a.m. We are back on the record.

Counsel may proceed.

BY MR. DUNLAP:

Q. I want to go back and pick up on a couple of things that you said. You told me about the company that you worked for and the period of time that you worked for them. Take me through the

CERTIFICATE OF REPORTER

I, Yvonne R. Thurston-Bohannon, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public for the State of South Carolina at Large, do hereby certify:

That the reading and signing of the foregoing deposition by the witness is waived.

That the foregoing transcript was taken before me on the date and at the time and location stated on page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal April 1, 2026, at Columbia, Richland County, South Carolina.



Yvonne R. Thurston-Bohannon
Registered Merit
Reporter, CRR
My Commission expires
May 14, 2035

Exhibit 41

EXPERT REPORT

In the Matter Of:

Clyde Marcus Jones, II, et al.
v.
Duke Energy Corporation and Duke Energy Carolinas, LLC

Lake Wateree PCB

Client:

Wyche, P.A.
807 Gervais Street, Suite 301
Columbia, South Carolina 29201

Prepared By:

Landmark Research Group, LLC
33971 Selva Road, Suite 230
Dana Point, CA 92629



Landmark Research Group, LLC
33971 Selva Road, Suite 230
Dana Point, California 92629
Office: (949) 497-7600
www.LandmarkResearch.com

February 10, 2026

Jessica Fickling, Esq.
Wyche, P.A.
807 Gervais Street, Suite 301
Columbia, South Carolina 29201

Re: Lake Wateree PCB

Dear Ms. Fickling:

In accordance with your request, we have set forth an evaluation of the unimpaired market value of the improved residential proposed class properties ("subject properties").

The accompanying report is considered a restricted appraisal report. This report can only be understood in combination with the supporting work file documentation, deposition, and trial testimony. Accordingly, the work file is considered a part of this report. This report may be presented to the court in the legal matter Clyde Marcus Jones, II, et al. v. Duke Energy Corporation and Duke Energy Carolinas, LLC. As discovery may be ongoing, Landmark Research Group reserves the right to revise and supplement this report.

Very truly yours,



Michael Tachovsky, PhD
Certified General Real Estate Appraiser (9013)

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REAL ESTATE MARKET TRENDS

The division of Economic Research at the Federal Reserve Bank of St. Louis (FRED) is responsible for expanding economic knowledge by producing research in many fields, including applied microeconomics, macroeconomics, and money/banking.[33] The Federal Reserve Bank of St. Louis is a leading, respected resource for economic and financial information.[34] The FRED publishes a house price index in numerous markets across the country, including those markets relevant to this study. While real estate valuation professionals may consider trending prices in a neighborhood(s), using the FRED index is an appropriate approach.[35] Accordingly, the FRED House Price Index for Kershaw and Fairfield Counties, South Carolina were studied. The Kershaw County FRED Index indicated that the current housing cycle started in approximately 2012, while the Fairfield County FRED Index indicated that the current housing cycle started in approximately 2014. To account for slight differences, the data used in the unimpaired analysis were from January 1, 2014, to January 31, 2026.

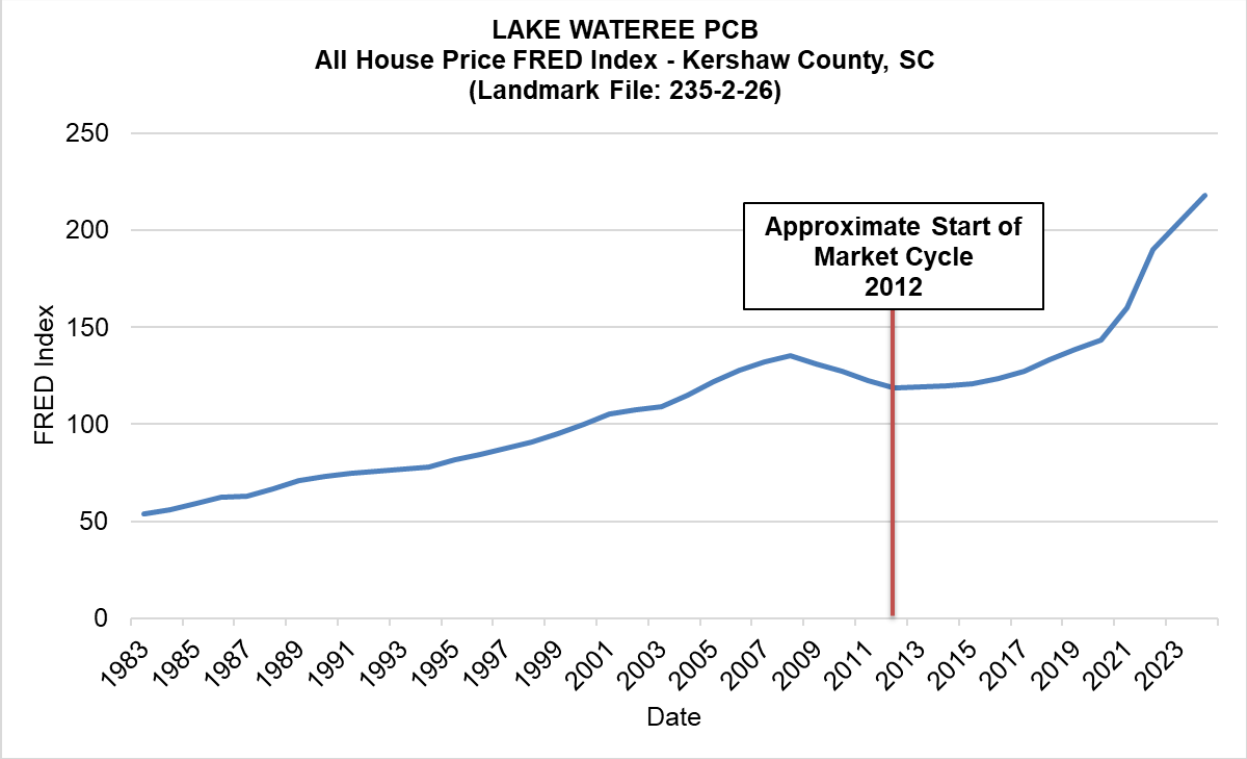


Figure 4: Kershaw County, SC FRED Index Market Trends Graph

[33] "About Economic Research at the St. Louis Fed," Economic Research at the Federal Reserve Bank of St. Louis, accessed December 17, 2019, https://research.stlouisfed.org/about.html.
[34] Dan L. Swango, "Economic Research Resources," *The Appraisal Journal* (Spring 2017): 148.
[35] Michael Tachovsky, "Stigma: A Case Study Analysis of Long-Term Environmental Risk Effect," *The Appraisal Journal* (Spring 2022): 120.

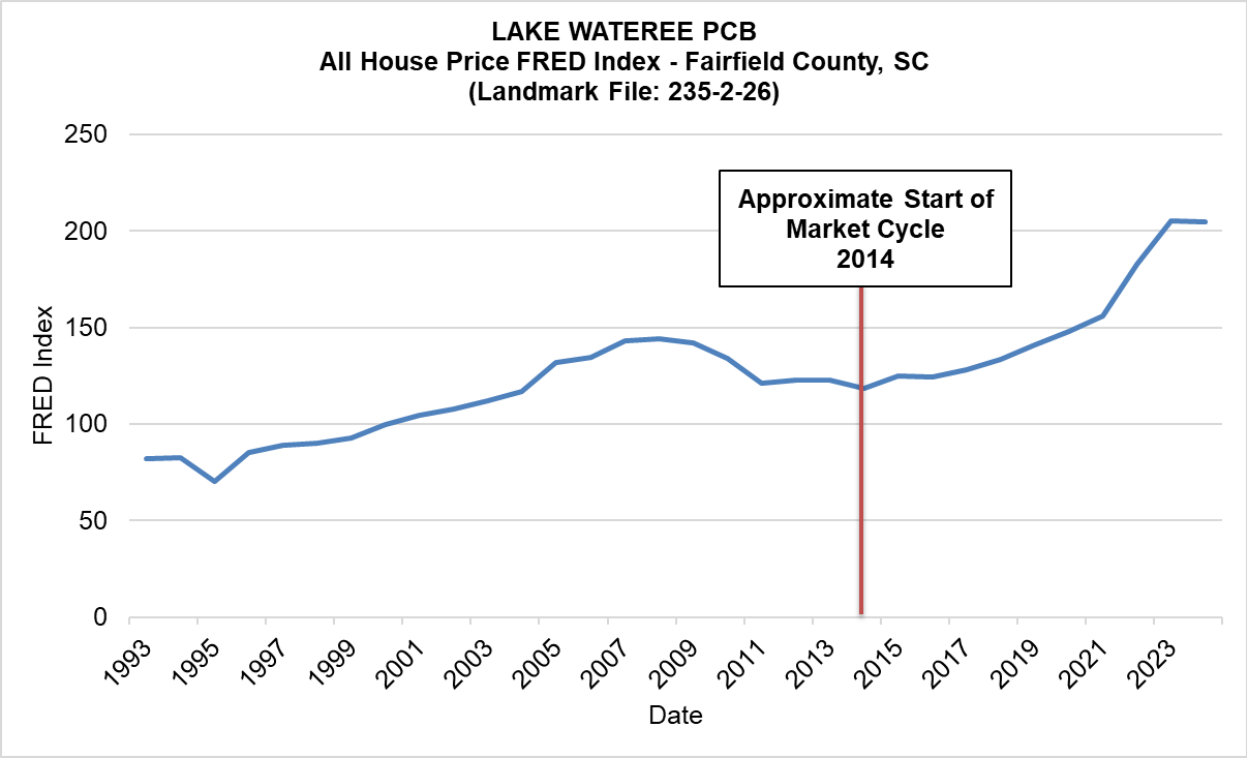


Figure 5: Fairfield County, SC FRED Index Market Trends Graph

Exhibit 42

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Clyde Marcus Jones, II, Dennis Phillips, and Deborah Phillips, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs. Case No. 3:24-cv-01281-MGL

Duke Energy Corporation and Duke Energy Carolinas, LLC,

Defendants.

VIDEOTAPED TELECONFERENCE

DEPOSITION OF: WILLIAM P. BECKHAM

DATE: Friday, October 17, 2025

TIME: 11:03 a.m.

TIME ENDED: 1:16 p.m.

LOCATION: Springhill Suites by Marriott
140 Wall Street
Camden, South Carolina

REPORTED BY: YVONNE R. THURSTON-BOHANNON
Registered Merit Reporter,
Certified Realtime Reporter

Job No. CS7650966

football coach?

A. No. He was not.

Q. And 1816, again, is a form that you signed as being in charge; is that right?

A. Correct.

Q. Did you ever go out on a boat with Mr. Jones or Mr. Hutchinson?

A. I worked with Mr. Hutchinson the first -- in '60 -- '65, '66 and '60 -- '66 and '67. However, at one point he was -- he went to a Boy Scout camp and Red Lynch was -- who was the head football coach took his place. So he worked for me about a month, but I can't remember if it was '66 or '67. I would say '67.

Q. And just to make sure I remember this right, you never saw drums being transported in or out?

A. No. Never did.

Q. All right. Bear with me just a minute.

In your affidavit if you'll go back to it, in paragraph 11 -- and actually before I ask you that, let me ask you another question.

In terms of the liquid that was in the barrel, from your own knowledge and expertise, you don't know what it was, do you?

A. Not really. I was -- the only thing I was told it was burnt diesel fuel, but I had -- you know. It was a job and it paid well.

Q. But you just don't -- you just don't have the expertise --

A. No.

Q. -- to have made a determination about what the liquid was, right?

A. No.

Q. Now, you used some language in here about an oil being burnt. What -- what does that mean?

A. I was told that it was burnt diesel fuel, you know. But Hutch may have said that. Hell, he may not have known. I mean, he just -- I can't tell you what it was.

I mean, that was -- somebody said, "What are you putting out?"

I said, "I'm putting out burnt diesel fuel."

Q. But you didn't know?

A. No, I didn't know.

Q. And so what did it smell like?

A. It didn't have a pungent smell. I mean, it was -- it smelled like oil, like --

whether -- what's in the barrels. There's no check, "Well, we put out one outboard oil used and we put out one transformer oil used." You -- you see that those columns are all blank?

A. Correct.

MR. DUNLAP: Objection.

BY MR. SOLOMONS:

Q. Is that because -- is the brake likelihood because you guys didn't know what was in the barrels?

MR. DUNLAP: Objection.

THE WITNESS: Correct.

BY MR. SOLOMONS:

Q. Yeah.

Did anyone from Duke ever explain -- come explain to y'all what was in the barrels?

A. No.

Q. Did anyone from Duke ever come and tell you that what you were putting in the lake could be harmful to your health?

MR. DUNLAP: Objection.

THE WITNESS: No.

BY MR. SOLOMONS:

Q. Did -- did anyone from Duke ever advise you that -- that the sprayer was using unsafe

CERTIFICATE OF REPORTER

I, Yvonne R. Thurston-Bohannon, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public for the State of South Carolina at Large, do hereby certify:

That the reading and signing of the foregoing deposition by the witness was not requested.

That the foregoing transcript was taken before me on the date and at the time and location stated on page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal October 17, 2025, at Columbia, Richland County, South Carolina.



Yvonne R. Thurston-Bohannon
Registered Merit
Reporter, CRR
My Commission expires
May 14, 2035

Exhibit 43

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CASE NO. 3:24-cv-01281-MGL

CLYDE MARCUS JONES, II, DENNIS PHILLIPS, AND DEBORAH PHILLIPS, ON BEHALF OF THEMSELVES AND ALL OTHERS SIMILARLY SITUATED,

Plaintiffs,

vs.

DUKE ENERGY CORPORATION AND DUKE ENERGY CAROLINAS, LLC,

Defendants.

DEPOSITION OF:	HENRY BECKHAM
DATE:	October 14, 2025
TIME:	9:14 a.m.
LOCATION:	Sheraton Myrtle Beach 2101 North Oak Street Myrtle Beach, South Carolina
TAKEN BY:	Counsel for the Defendants
REPORTED BY:	KAREN M. BECKMAN, CSR

Job No. CS7650964

A. No. 97.
Q. 97. Can you make that 7 a little more clear?
A. (The witness complies.)
Q. There you go. There.
When you would come in in the mornings to work here at the property, where would you park?
A. I don't remember.
Q. Okay.
A. Near the shed. Probably tried to find a shady tree to leave the car, you know, at the time.
Q. Okay. The container that was used, it was a large container, right? The tank?
A. The fuel oil?
Q. Yes.
A. Yes.
Q. And in terms of the content -- you've just referred to fuel oil -- how do you know what was in the tank?
A. I was under the impression speaking with the people at Duke that we would talk to from time to time and my impression of that whole operation had been that this was burned transformer oil that Duke had taken out of transformers that

were no longer in service. They were using that. Now, I don't know if that was there or if it was home heating oil. I don't know.

Q. So you personally don't know --

A. No.

Q. -- what was in it? Okay.

Can you estimate the size of the tank for me? I mean, are we talking something that was roughly the size of a tanker trunk used to transport gasoline via semi?

A. I think so. I want to say I remember, I want to say, around several thousand gallons. And, yeah, that probably would be a good description would be where you would see a fuel tanker on a truck.

Q. And was it there the whole time you worked there?

A. Again, they put it there when they built the shed.

Q. Right.

So it was there. I just want to confirm that?

A. Yes.

Q. Okay. What was on that spot before the container?

Do you see in the column where it says Fuel Oil #2 used and then Fuel is stricken and they handwrote above that Little Motor? Do you see that?

A. Yes.

Q. Do you recall motor oil being used?

A. Again, there was never any distinction. I didn't know what was in the barrel. When it had oil, it was oil. And then the only oil I would have used outside of what we were spraying would have been that outboard oil for the gas mix. I have no idea what that little motor refers to.

Q. Okay. All right.

For just a minute, let's go back to the first page of this exhibit. Charles Wilson, is he still around?

A. Charlie was a friend of -- he and Buster grew up together. He was from Camden. They were at Clemson together. And I assume Charlie was filling in at some point for somebody.

Q. Okay. And then if you look on the next page, it refers to Mr. Hutchinson, who I think you said was the assistant football coach --

A. Yeah.

Q. -- is that right?

And then on this page, under Number of

entire childhood and life?

A. I don't know if the barrel was leaking, but there was leakage over the time of handling these things.

MR. DUNLAP: Objection.

I'm sorry. I just needed to say that before he asked another question.

BY MR. SHEHEEN:

Q. In the very beginning when you were discussing the affidavit that I drew up after speaking with you, you said that you had no edits to that affidavit. Would it be appropriate to say that you had no edits because it precisely summarized the conversation we had had?

MR. DUNLAP: Objection.

THE WITNESS: I think it summarizes the conversation we had.

BY MR. SHEHEEN:

Q. Okay. Just a couple more here, Mr. Beckham. You testified earlier that your understanding of the substance that went -- that you were spraying included burnt transformer oil. Who did you speak to that gave you that understanding?

MR. DUNLAP: Objection.

THE WITNESS: That was my understanding. It may have been my brother. It may have been my uncle. It may have been Mr. Swearingen. It may have been Mr. Watts, who was kind of the mechanic for Duke Power Company. But, I mean, it was just like it was never one day that somebody said this is what it is. It was just always my understanding that that's what we had.

BY MR. SHEHEEN:

Q. During your time working with the Mosquito Control Program, this was your only job, right?

A. It was a summer job.

Q. And what was your understanding of who you were working for?

A. Duke Power Company.

Q. And during this program, you were just following orders; is that correct to say?

MR. DUNLAP: Objection.

THE WITNESS: Yes.

BY MR. SHEHEEN:

Q. Were you ever asked for any input in best practices for spraying the lake?

A. No.

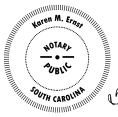
Q. Was it your understanding that Duke was

CERTIFICATE OF REPORTER

I, Karen M. Beckman, Court Reporter and Notary Public for the State of South Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 14th day of October, 2025, at Myrtle Beach, Horry County, South Carolina.



Karen Beckman
Court Reporter
My Commission expires
September 3, 2035