

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)

IN THE COURT OF COMMON PLEAS
FOR THE SIXTEENTH JUDICIAL CIRCUIT

Civil Action No. 2012-CP-46-3151

The Winthrop University Trustees for the)
State of South Carolina,)

AFFIDAVIT OF BERT PICKENS

)
Plaintiff,)

v.)

)
Pickens Roofing and Sheet Metals, Inc.,)

)
Defendant.)

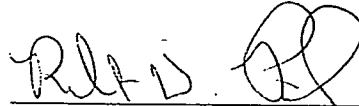
PERSONALLY appeared before me, Bert Pickens, who, being duly sworn, deposes and states that the following is based upon his own personal knowledge, except those matters stated upon information and belief, and as to those matters, he believes them to be true:

1. I am a citizen and resident of Spartanburg, South Carolina.
2. I am over the age of eighteen and am of sound mind to give this affidavit.
3. I am an employee of Pickens Roofing and Sheet Metals, Inc. ("Pickens Roofing"), a family-owned roofing contractor that has been in operation for more than one hundred years.
4. At no time from January 1, 2013 to December 31, 2015 has Pickens Roofing employed more than 50 persons and had gross revenues of more than Five Million Dollars (\$5,000,000).
5. The Plaintiff's judgment entered against Pickens Roofing in the above-captioned action exceeds Pickens Roofing's insurance coverage by more than One Million (\$1,000,000) Dollars.



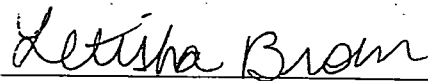
6. Any attempt to execute the Plaintiff's judgment prior to the resolution of the pending appeal in the above-captioned matter will have a materially adverse impact upon the financial position of Pickens Roofing.

FURTHER AFFIANT SAYETH NAUGHT.



Bert Pickens

SWORN TO BEFORE ME THIS 16th
DAY OF November 2016.



Letisha Brown
NOTARY PUBLIC FOR SOUTH CAROLINA

MY COMMISSION EXPIRES: December 27, 2017