

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
G. Thomas Cooper, Jr., Circuit Court Judge

RECEIVED

Case No. 2014-CP-40-6224
Appellate Case No.: 2016-000989

OCT 19 2016
SC Court of Appeals

Carol Goodson-Eaddy.....Appellant,

v.

**Travien L. Capers, Gregory A. Brown, Robert Davis, Herbert Bell, James Randolph, Jr.,
Harry Thompson, James Brown, Frank M. Jones, Edwin L. Rivers, Sr., Lever Thompson,
Jr., Fred Davis, Harry L. Jones, Sr., David J. Clarkson, Larry B. Brown, Grady Wilson,
and Dorothy B. Adams.....Respondents.**

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1 State of South Carolina) Court of Common Pleas
2 County of Richland) No.: 2014-CP-40-6224
3
4

5 Carol Goodson-Eaddy,)
6 Plaintiff,)
7 vs.) Deposition of
8) CAROL GOODSON-EADDY
9 Travien L. Capers,)
10 Gregory A. Brown, Robert)
11 Davis, Herbert Bell,)
12 James Randolph, Jr.,)
13 Harry Thompson, James)
14 Brown, Frank M. Jones,)
15 Edwin L. Rivers, Sr.,)
16 Lever Thompson, Jr.,)
17 Fred Davis, Harry L.)
18 Jones, Sr., David J.)
19 Clarkson, Larry B.)
20 Brown, Grady Wilson, and)
21 Dorothy B. Adams,)
22) September 3, 2015
23 Defendants.)
24
25

17 Deposition on oral examination of Carol
18 Goodson-Eaddy, reported by Jeffrey M. Thomas,
19 Registered Professional Reporter and Notary Public
20 in and for the State of South Carolina; said
21 deposition taken pursuant to agreement and in
22 accordance with the South Carolina Rules of Civil
23 Procedure, at the Offices of Murphy & Grantland, PA,
24 4406-B Forest Drive, Columbia, South Carolina, on
25 September 3, 2015, at the hour of 10:00 a.m.

Appearances

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18	each copy of transcript.)	
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23 * * * * *

1 This deposition is taken in
2 accordance with the South Carolina Rules of Civil
3 Procedure.

4 It is agreed and stipulated by the
5 Deponent and respective counsel that the reading and
6 signing of the deposition by the Deponent is
7 expressly not waived.

8 WHEREUPON:

9 CAROL GOODSON-EADDY, being duly sworn
10 and cautioned to speak the truth, the whole truth
11 and nothing but the truth, testifies as follows:

12 EXAMINATION

13 BY MR. FARR:

14 Q. All right. If you will state your full
15 name for the record, please.

16 A. Carol Goodson-Eaddy.

17 Q. And have you ever given a deposition
18 before?

19 A. No, sir.

20 Q. Go over a few rules for you to keep in
21 mind. You heard most of them yesterday, but just a
22 refresher for you. There is a court reporter seated
23 here. He's recording everything, so make sure all
24 of your answers are out loud. Use clear words like
25 yes or no rather than uh-huh or uh-uh.

1 And if you will wait for me to finish my
2 question before you answer, I will try to wait for
3 you to finish your answers before I ask my next
4 question so we don't talk at the same time and
5 jumble the transcript.

6 If you do not understand a question that I
7 ask you today, please have me repeat myself or
8 rephrase my question so you understand what is being
9 asked before you answer. If you do answer I will
10 assume you understood my question. Is that fair?

11 A. Yes, sir.

12 Q. Your attorney may object to some questions
13 that I ask today, just like I did yesterday. It's
14 being noted for the record so that the court
15 reporter can include it in the transcript, and we
16 can talk to a judge later about whether the question
17 was phrased properly.

18 If he does object, you can go ahead and
19 answer the question after he notes his objection
20 unless he specifically tells you, do not answer the
21 question.

22 A. Okay.

23 Q. If we do take a break, and you are free to
24 take a break at any time, but if we do take one you
25 don't have the same attorney/client privileges that

1 you would normally have until this deposition is all
2 through.

3 So until the deposition is finally
4 completed, please keep that in mind when you have
5 any discussions. Don't discuss your testimony with
6 someone because while the deposition is ongoing if
7 you discuss your testimony, then you would have to
8 disclose what you talked about if asked.

9 So the safe thing is for people to not
10 discuss their testimony until it's all through just
11 because you don't have the privileges attach during
12 this time. We will go ahead and get started. If
13 you do have any questions at any point, please
14 address those to me. Go ahead?

15 A. When you say you can't talk about the
16 deposition, during this time or after it's over
17 with?

18 Q. During this time.

19 A. Okay.

20 Q. Once the deposition is over, and we are
21 through with your testimony, then you can once again
22 discuss freely. And you will have your
23 attorney/client privilege back, but while -- from
24 the start -- from once you get sworn in until the
25 deposition is through, that is the period that you

1 can't.

2 A. Okay.

3 Q. All right. We'll go ahead and get
4 started. What is your current address?

5 A. 1204 Clarkson Road, Hopkins, 29061.

6 Q. How long have you lived on Clarkson Road?

7 A. Since 1991.

8 Q. Who lives there with you?

9 A. My husband.

10 Q. What is his name?

11 A. William Daniel Eaddy, but his real name is
12 Willie Daniel Eaddy, but we call him William.

13 Q. All right. And is Danny a middle name or
14 does --

15 A. Daniel.

16 Q. Daniel a middle name or --

17 A. Yes.

18 Q. -- is it part of his last name?

19 A. Yes. Daniel Eaddy, uh-huh.

20 Q. And what does William Eaddy do?

21 A. He's retired.

22 Q. From what?

23 A. Berlex Lab.

24 Q. Do you have any children?

25 A. Yes.

1 Q. What are their names and ages?

2 A. Shawn Hill. He is 31.

3 Q. Shawn Hill?

4 A. Yes, Shawn. Shawn Hill. Shane Dyckes,
5 D-y-c-k-e-s. He is 26.

6 Q. Any others?

7 A. Just grandkids.

8 Q. Have you ever been married before William
9 Eaddy?

10 A. Yes.

11 Q. Who else have you married?

12 A. I married Herbert Hill, Shawn's father.
13 And Willie Dyckes, Shane's father.

14 Q. When were you married to Herbert Hill?

15 A. I got married -- my mother died in '81.
16 '82.

17 Q. How long were you married to Herbert Hill?

18 A. Two years.

19 Q. What happened at the end of that marriage?
20 Did he pass? Divorce?

21 A. No, we just divorced.

22 Q. Okay. Is he still living?

23 A. Yes.

24 Q. Where does he live?

25 A. Florida.

1 Q. Does Shawn live in South Carolina?

2 A. Yes, he does.

3 Q. Where does he live?

4 A. He just moved into an apartment off of
5 Piney Grove Road.

6 Q. And is Shawn married?

7 A. No.

8 Q. Does Shawn have children?

9 A. Yes, he does.

10 Q. Are any of them over the age of 18?

11 A. No.

12 Q. That is what I expected that answer to be,
13 but just asked to make sure.

14 A. Okay.

15 Q. How about Willie Dyckes, when did you
16 marry him?

17 A. I think I married him in '88. Got married
18 in '88.

19 Q. And how long were you married to Willie
20 Dyckes?

21 A. Two years.

22 Q. Did that end in divorce?

23 A. Divorce, uh-huh.

24 Q. Where does Willie Dyckes lives?

25 A. He lives in Columbia.

1 **Q. What is his address?**

2 A. I know it's Cindy Drive, Columbia. That
3 is all I know.

4 **Q. Is Shane his only child?**

5 A. He has a daughter.

6 **Q. And does she live around here?**

7 A. I don't know too much about her. I just
8 know her name is Shante. That's all. She lives in
9 Nevada I want to say, but I stand to be corrected.

10 **Q. Where does Shane live?**

11 A. Shane lives in Charlotte, North Carolina.

12 **Q. Does Shane have children?**

13 A. His fiancée has three kids.

14 **Q. And does his fiancée live in Charlotte as**
15 **well?**

16 A. Yes.

17 **Q. I believe I asked this. Shawn is not**
18 **married; is that correct?**

19 A. Shawn is not married. Shane was married.
20 Shane is getting married.

21 **Q. Does your husband have any children?**

22 A. Yes, he does.

23 **Q. Who would those be?**

24 A. He has three. He has a son and two
25 daughters.

1 Q. What are their names and ages?

2 A. Well, Keith, Tasha, and Saletha.

3 Q. Can you spell that last one?

4 A. No. I don't know how to spell Saletha.

5 Q. Saletha?

6 A. Saletha.

7 Q. All right. How old is Keith?

8 A. I think all of them are in their 40s. I
9 really don't know.

10 Q. Do they all have the same mother?

11 A. Yes, they do.

12 Q. Is she still alive?

13 A. Yes, she is.

14 Q. Is she still in Richland County?

15 A. No. Their mother is from Florida.

16 Q. Okay. So she lives in Florida?

17 A. Yes. And with my stepchildren, I might
18 have their age incorrect because I don't really know
19 their age. 40s and 50s. I don't know.

20 Q. Do they live around here?

21 A. No. They live in New Jersey.

22 Q. All three of them?

23 A. No. Except for -- two live in New Jersey
24 and one lives in Florida.

25 Q. All right. What is your date of birth?

1 A. [REDACTED]

2 Q. And we've gone through a listing of some
3 of your relatives in Richland County. Before I get
4 into more relatives, where are you from originally?

5 A. Hopkins, South Carolina.

6 Q. Lived there all of your life?

7 A. Except for military and when I moved away
8 and lived in D.C.

9 Q. Are your parents living?

10 A. No, my parents are deceased.

11 Q. Do you have any brothers or sisters?

12 A. Yes.

13 Q. Do they live in Richland County?

14 A. All but one.

15 Q. All right. Let's go through those. Who
16 are your brothers and sisters?

17 A. My oldest sister is Leila Harrison. She
18 lives in Savannah, Georgia. My oldest brother is
19 Napoleon. He lives in Columbia.

20 Q. What is Napoleon's last name?

21 A. All of them are Goodson. He's the III.
22 Napoleon Goodson, III.

23 Q. Is Napoleon married?

24 A. Yes.

25 Q. What is his wife's name?

1 A. I think her name is Sue Ann.

2 Q. Does he have any children over the age of
3 18?

4 A. Yes.

5 Q. Who would those be?

6 A. Napoleon, IV; Sandy Goodson; and Latina
7 Morris.

8 Q. What other brothers or sisters do you
9 have?

10 A. Thomas Goodson.

11 Q. Is he married?

12 A. Yes, he is.

13 Q. What is his wife's name?

14 A. Herdie Steen.

15 Q. Does he have any children over the age of
16 18?

17 A. Yes.

18 Q. What are their last names?

19 A. Thomas and Michael Goodson.

20 Q. What other siblings do you have?

21 A. Jacqueline Brown. There are 10 of us.

22 Q. All right. Is Jacqueline Brown married?

23 A. Yes.

24 Q. To who?

25 A. Anthony Brown.

1 Q. Does she have any children over the age of
2 18?

3 A. Yes, she does.

4 Q. What are their names?

5 A. Deidre Brown, Anthony Brown, and Carlos
6 Brown.

7 Q. Carlos Brown?

8 A. Carlos, uh-huh.

9 Q. All right. Who else?

10 A. Heyward Goodson.

11 Q. Heyward?

12 A. Heyward. W-a-r-d -- H-e-y.

13 Q. And is Heyward married?

14 A. Yes. No, he's divorced.

15 Q. Is his ex-wife still in Columbia?

16 A. No, excuse me, I take that back. He's
17 married but separated. Have to think about it.
18 Excuse me. My candy dropped.

19 Q. That's all right. You can get it if you
20 need to. Heyward's wife's name is what?

21 A. Heyward's first wife's name is Mary
22 Bennett. His second wife -- Mary is the ex-wife.
23 And his second wife is Estell Goodson.

24 Q. Does he have children over the age of 18?

25 A. Yes.

1 Q. Who would they be?

2 A. From his first marriage; Carla Renee
3 Goodson. And Heyward, II, from the second marriage.

4 Q. All right. And who is the next sibling?

5 A. Calvin Goodson. That is my twin.

6 Q. Is Calvin married?

7 A. No.

8 Q. Calvin have any children over the age of
9 18?

10 A. Yes.

11 Q. Who would they be?

12 A. Her name is Laura Butler.

13 Q. Laura Butler?

14 A. I don't know her married name.

15 Q. And who is Laura Butler's mother?

16 A. Mary. Mary Tucker. I don't know her
17 married name.

18 Q. Does she live in the area still?

19 A. She lives in Florida, Jacksonville.

20 Q. Who are your other siblings?

21 A. Michael Goodson.

22 Q. Is Michael married?

23 A. No.

24 Q. Does Michael have any children over the
25 age of 18?

1 A. No.

2 Q. Does he have any children at all?

3 A. Yes.

4 Q. And who is their mother?

5 A. What was her name? I have no idea what
6 her name is. I just know the son.

7 Q. All right. Who is the next sibling?

8 A. Eleanor Patterson.

9 Q. Who is she married to?

10 A. She's not. She's divorced.

11 Q. Who is she divorced from?

12 A. George Patterson.

13 Q. Does she have any children over the age of
14 18?

15 A. Yes.

16 Q. Who would they be?

17 A. Carmella Patterson and Donneta Della La
18 Cruz. Della La Cruz.

19 Q. Della La Cruz?

20 A. Yes.

21 Q. Who is the next sibling?

22 A. Adopted. Latasha Monique Goodson.

23 Q. Is she married?

24 A. I do not know.

25 Q. Do you know if she has any children?

1 A. Yes.

2 Q. Are any of them over the age of 18?

3 A. No.

4 Q. Does she still live in Richland County?

5 A. Yes.

6 Q. Who is the next sibling?

7 A. I think that is the 10 of us including
8 myself.

9 Q. Any other relatives that you see more than
10 once a year with a last name other than Harrison,
11 Goodson, Morris, Brown, Butler, Patterson, Della La
12 Cruz?

13 A. Out of my siblings?

14 Q. Yes.

15 A. I see my younger sister a lot.

16 Q. Okay. And I'm saying any -- any relatives
17 that you have in Richland County with a last name
18 other than the ones I just mentioned that you see
19 more than once a year?

20 A. Yes.

21 Q. Okay. Who are -- what are the other names
22 of relatives that you see?

23 A. Joyce Sims, Wanda Scott. That is
24 basically it for right now that I can think of
25 because I mostly spend my time with them.

1 Q. Okay. You went to school in Hopkins?

2 A. Yes, I did.

3 Q. What high school did you go to?

4 A. Lower Richland.

5 Q. What year did you finish there?

6 A. Twelfth grade.

7 Q. What year did you finish?

8 A. Oh, I apologize. '74. 1974. I didn't
9 hear what you said.

10 Q. Did you go on for any additional schooling
11 after that?

12 A. Yes, I did.

13 Q. Where did you go?

14 A. Benedict College.

15 Q. Did you graduate?

16 A. Two years. Sophomore year I quit. I went
17 into the military.

18 Q. What branch?

19 A. U.S. Army.

20 Q. How long were you in?

21 A. Three years.

22 Q. What was your rank at discharge?

23 A. E-4.

24 Q. Honorable discharge?

25 A. Yes.

1 **Q. Did you ever attend any additional**
2 **schooling after you got out of the military?**

3 A. I don't -- if I did, I went to Tech, but
4 I'm not sure so I can't answer that.

5 **Q. Did you ever obtain any degree?**

6 A. No. Only degree I have -- well, it's not
7 a degree. I have a certificate in -- now they are
8 called ward clerks. I was a ward clerk. Now they
9 are called unit secretaries. I got a certificate in
10 that from Midlands Tech.

11 **Q. What year did you get out of the Army?**

12 A. 1980.

13 **Q. Do you currently work?**

14 A. No.

15 **Q. When did you last work?**

16 A. 1993. January 8th of 1993.

17 **Q. What job was that?**

18 A. I was at School District One. Richland
19 County School District One. I want to say it was
20 January 8th, 1993, because I went on Disability at
21 that time.

22 **Q. What were you doing at the School**
23 **District?**

24 A. I was a clerical assistant.

25 **Q. What was the circumstances around leaving**

1 **that job?**

2 A. My disability. I went on Disability.

3 **Q. What is your disability?**

4 A. Sarcoidosis, Stage 4.

5 **Q. You had Stage 4 at the time you went on**
6 **Disability?**

7 A. Yes. I was placed on Disability in 1992,
8 but I couldn't leave work until '93.

9 **Q. Tell me how the sarcoidosis affects you.**

10 A. I have a short of breath, weight loss. So
11 many things. Mostly I'm tired a lot. Can't walk
12 too long without taking breaks. Have to rest a lot.

13 **Q. What is the current prognosis for you? Is**
14 **it stable? You just medicate or how does that --**
15 **how are you dealing with it?**

16 A. It is serious, but stable.

17 **Q. Does your -- let me ask you this. Your**
18 **husband retired. When did he retire?**

19 A. I think it was in 2001, somewhere along in
20 there. I'm not sure.

21 **Q. When did the two of you marry?**

22 A. In 2000. January 1st, 2000.

23 **Q. And he retired just before or just after**
24 **that?**

25 A. Ask me that again, please?

1 Q. Did he retire just before you got married
2 or just after you got married?

3 A. I'm not sure. I'm not sure.

4 Q. Is the Retirement and the Disability the
5 only sources of income you currently have?

6 A. I don't know what you are asking me.

7 Q. Your sources of income currently?

8 A. Okay. I am also a disabled vet. I became
9 that later, but my Disability came from Social
10 Security.

11 Q. All right. Other than the Disability that
12 you receive and your husband's retirement, what
13 other sources of income do you have?

14 A. The V.A.

15 Q. Is your disability tied to your military
16 service?

17 A. Yes.

18 Q. What do they attribute the connection to?

19 A. They weren't sure, but I was diagnosed
20 with sarcoidosis in the military, but I didn't know
21 that until years later. It was in my medical
22 records. And a dentist discovered it, but they
23 didn't tie that in until the middle '80s, almost
24 late '80s.

25 Q. When did you first start going to Zion

1 **Benevolent Baptist Church?**

2 A. As a child. So very young age. About
3 seven years old.

4 Q. You've been a member there ever since?

5 A. I've been a member -- when I was baptized
6 in '68.

7 Q. Any roles that you've served at the
8 church?

9 A. Yes.

10 Q. What roles?

11 A. I was on the By-Law Ministry, Constitution
12 and By-Law Ministry. The History Ministry. And I
13 was just a person that would help out wherever
14 needed.

15 Q. Other than the sarcoidosis, have you had
16 any other medical treatment that you've gone through
17 with the military or any ongoing problems that you
18 sustained due to the military service?

19 A. Yes.

20 Q. What else?

21 A. From the sarcoidosis I developed asthma
22 because of the seriousness where it attacked my
23 lungs. So -- and just here July of last year I was
24 awarded P.T.S.D.

25 Q. Who do you treat with for the P.T.S.D.?

1 A. The V.A.

2 Q. Anything else you treat with the V.A.
3 other than P.T.S.D., asthma, and sarcoidosis?

4 A. That is basically it. That is about all.
5 Anything that I need to be treated I go to the V.A.

6 Q. Do you see any other doctor or mental
7 health professional or any kind of medical
8 professional other than the V.A.?

9 A. Just the V.A.

10 Q. Do you recall in the last 10 years
11 treating with the V.A. anything other than the
12 P.T.S.D., the asthma, and the sarcoidosis?

13 A. I was just awarded P.T.S.D in 2014, so
14 just sarcoidosis and asthma.

15 Q. What is the P.T.S.D related to?

16 A. When I was in Germany I was in a very bad,
17 abusive relationship. And I was having a very
18 difficult time with that.

19 Q. You were in Germany what years?

20 A. From '78 to '80. From '79 to '80.
21 Eighteen months in the States and 18 months
22 overseas.

23 Q. And what relationship were you in in
24 Germany?

25 A. I was in a relationship with a female --

1 not a female. A male. Excuse me. A male.

2 Q. Who was that?

3 A. A guy named Samstein.

4 Q. And you were abused in that relationship?

5 A. Very much. Yes, very much.

6 Q. And you've now gotten a P.T.S.D diagnosis
7 35 years later?

8 A. Yes. Because I was trying to explain to
9 them what I was going through.

10 Q. You were trying to explain to who?

11 A. To the V.A.

12 Q. When?

13 A. Since I -- not since I was going there. I
14 just didn't talk about it. I don't like to talk
15 about it because it bothers me. So I kind of like
16 back away from it.

17 So I finally got the courage to start
18 talking about it a couple of years ago, but it
19 seemed like no one was paying any attention. So
20 then when this crisis with the church came up, I
21 started seeing it all over again. It's like I'm --
22 it's coming at me, and I can't -- so I had to see a
23 counselor.

24 Q. And you saw a counselor at the V.A.?

25 A. Yes.

1 Q. And they realized that you had this
2 problem from 35 years ago that is just now coming to
3 light?

4 A. I guess, yes. Uh-huh.

5 Q. So the P.T.S.D diagnosis relates all to
6 that situation that happened in Germany in the late
7 1970s?

8 A. Yes. They are relating some of that to
9 that, yes, because they could place me in Germany at
10 that time. And basically I just went through a
11 difficult period. And it's very hard to talk about.
12 It really is.

13 Q. Is it physical abuse? Psychological
14 abuse?

15 A. It's physical. It's more physical than
16 anything.

17 Q. Other than sarcoidosis, the asthma, the
18 P.T.S.D, from the -- from what happened back in
19 Germany?

20 A. Uh-huh.

21 Q. Is there anything else where you've had to
22 treat with the V.A.?

23 A. I have mood swings, but I have not been
24 treated for that.

25 Q. All right.. So no other treatment that

1 **you've had other than --**

2 A. Uh-uh. Just for the P.T.S.D.

3 **Q. The P.T.S.D from -- from your military**
4 **service?**

5 A. Yes.

6 **Q. The sarcoidosis and the asthma?**

7 A. Yes.

8 **Q. With the P.T.S.D diagnosis, has it**
9 **primarily been anxiety issues?**

10 A. Yes.

11 **Q. And have they provided you medications for**
12 **that?**

13 A. No. I refuse medication.

14 **Q. What treatment method are they giving you**
15 **for the P.T.S.D?**

16 A. Talk about it.

17 **Q. All right. So it's more of a counseling**
18 **prescription, if you will?**

19 A. Yes. Uh-huh. Talk about it. Yoga.
20 Exercise. And that is what I do.

21 **Q. Has that all helped?**

22 A. Yes. Yes. And bake cakes.

23 **Q. And that prescription of talking about it**
24 **and yoga, that was done by someone at the V.A.?**

25 A. Yes. I had the counseling at the V.A.

1 And they recommend that I take yoga through the
2 V.A., but I do it at home.

3 Q. And all of that is to help with your
4 P.T.S.D from Germany?

5 A. Yes. Well, any kind of anxiety that comes
6 upon me. And I also did seek counseling for this
7 matter that happened with the church.

8 Q. Okay. When did you first seek counseling
9 for the matter with the church?

10 A. In November.

11 Q. When did you first seek counseling for
12 anything else at the V.A.?

13 A. Pertaining to this case?

14 Q. No, just ever.

15 A. I've been going to the V.A. since 1980.

16 Q. For counseling?

17 A. No, not for counseling.

18 Q. When did you first seek any counseling at
19 the V.A. for any anxiety or other mental stresses
20 that you were having?

21 A. I'm not sure.

22 Q. Have you been counseling at the V.A. for
23 multiple years?

24 A. It's been, I would say, less than five
25 years.

1 Q. And that counseling all up until November
2 related to what happened in Germany?

3 A. No.

4 Q. What else were you counseled for?

5 A. When me and my husband separated.

6 Q. Okay. William?

7 A. Yes.

8 Q. When did you and William separate?

9 A. About two or three years ago.

10 Q. Why did you separate?

11 A. There was a lot going on in our marriage.

12 Q. Any particular thing that caused you to
13 separate?

14 A. It's personal.

15 Q. I understand it's personal, but you've
16 just said that you are attributing counseling to the
17 current lawsuit.

18 A. Yes.

19 Q. So if there is -- if there is counseling
20 that is attributed to the current lawsuit, then I
21 have to go into all of your counseling.

22 A. Okay.

23 Q. So --

24 A. Are you talking about my marriage now?

25 Q. Yes. Right now I'm talking about the

1 marriage.

2 A. Okay.

3 Q. The reasons you and William separated?

4 A. We had so many. I think my attention was
5 away from him. He felt neglected.

6 Q. Because of what?

7 A. I think I had my interest more into church
8 than I did my marriage.

9 Q. Whose decision was it to separate?

10 A. He had enough. It was his.

11 Q. Did you agree with the decision?

12 A. No.

13 Q. Did the two of you move into separate
14 houses for a period?

15 A. Yes.

16 Q. Who moved out?

17 A. He did.

18 Q. Where did he go?

19 A. Baptist Row to a senior home.

20 Q. And what did you do during that period
21 where he was out?

22 A. Chased him.

23 Q. Did you start going to counseling before
24 or after you separated?

25 A. I went to counseling after we separated.

1 Q. And what was the -- what were you going
2 through at that point that made you feel the need to
3 have counseling to help?

4 A. Try to resolve -- you know, resolve my
5 marriage.

6 Q. Were you having anxiety?

7 A. That I was.

8 Q. Physical problems as well?

9 A. Yes. Anxiety mostly.

10 Q. What other problems were you having other
11 than anxiety?

12 A. I was crying a lot. Crying a lot.
13 Because I felt it was my fault.

14 Q. Did you ever have any weight loss problems
15 during that period or have you struggled with that
16 since the diagnosis of sarcoidosis?

17 A. Since the diagnosis of sarcoidosis. I've
18 gained weight.

19 Q. How long did you go to counseling for the
20 relationship?

21 A. I'm not sure. My counseling sessions
22 don't last long because after a period of time I get
23 tired of hearing about it. So then I decide to act
24 on it. I don't like to keep hearing myself whine.
25 So I told them, I said, I'm done. I'm ready to move

1 on.

2 Q. You told who that?

3 A. The counselor.

4 Q. And when did you and William reconcile?

5 A. After the issue with the church. He
6 decided to stand beside me.

7 Q. So the two of you were separated for two
8 years?

9 A. Probably, give or take.

10 Q. And you were struggling with anxiety
11 throughout that entire period?

12 A. When we were separated, yes.

13 Q. And you were counseling throughout that
14 period?

15 A. Yes. But my counseling didn't last long
16 because after a period of time I don't like to hear
17 myself repeat the same thing. So I told her I was
18 ready to go. But I don't know exactly -- I don't
19 like for a counseling session to last over a year.

20 Q. Had the counseling session that you had
21 with your separation lasted longer than a year?

22 A. I don't think so.

23 Q. Was that the first time you had ever gone
24 through counseling?

25 A. No.

1 **Q. When else had you gone through counseling?**

2 A. When my children were younger.

3 **Q. Where was that counseling?**

4 A. At the V.A.

5 **Q. When was that?**

6 A. I have no idea, but it's been when they
7 were younger. I had to -- trying to deal with my
8 oldest son going through his stages in life. I
9 didn't know how to handle a male -- young male. So
10 I had to read books about things that they would go
11 through because what he was -- he was just going
12 through a change in life.

13 And at that time I didn't have anyone that
14 I could talk to about what I was going through with
15 my oldest son. I reached out to the pastors, but --
16 and the community, but they didn't stick with it too
17 long.

18 **Q. Was that when he was a child? An**
19 **adolescent?**

20 A. Yeah.

21 **Q. Young adult?**

22 A. Well, he's an adult. He's on his own now,
23 but as a growing teenager. And I needed a lot of
24 help with my sons.

25 **Q. Sometime around the year 2000?**

1 A. It was before 2000.

2 Q. All right.

3 A. Yes. Before I was married. And it was
4 after -- it was after my divorces, and my sons was
5 growing up. They were growing up, and I needed help
6 with them.

7 Q. So other than the counseling when your
8 sons were growing up, and the counseling when you
9 were separated from William, was there any other
10 counseling you had gone through prior to last year?

11 A. Not at the V.A. Now that you -- bring
12 back things to me. Mostly when my sons were younger
13 I reached out for help with them to help me to help
14 them. Went to United Way. That was just to get
15 some counseling.

16 Q. And when did you say was the P.T.S.D
17 diagnosis?

18 A. It was last year; 2014.

19 Q. What time of year? Late in the year?

20 A. July.

21 Q. So July 2014 you got the P.T.S.D
22 diagnosis?

23 A. Yes.

24 Q. Do you remember which date in July?

25 A. No.

1 **Q. So before all of this stuff with the**
2 **church -- let me split that out. You were diagnosed**
3 **with P.T.S.D in July?**

4 A. Yes.

5 **Q. You had been counseling with the V.A. up**
6 **to that point?**

7 A. I had been counseling with Dr. -- I don't
8 know the name. Blair-Baker or Baker-Blair about
9 the -- not so much with the P.T.S.D., but with my
10 issues with the church and my marital problems.

11 **Q. And Dr. Blair is at the V.A.?**

12 A. Yes, she is. I usually to get her name
13 backwards. I don't know if it's Baker-Blair or
14 Blair-Baker.

15 **Q. Did you ever call the suicide crisis line?**

16 A. Yes, I did.

17 **Q. What was that about?**

18 A. Because I feared for my life.

19 **Q. When did you fear for your life?**

20 A. Shortly after I started with the church
21 issues I started getting phone calls. People were
22 hanging up. Strange cars were driving past my
23 house. And my husband suggested that he really was
24 afraid for me, he said, because you don't know what
25 people might do, so you need to watch yourself.

1 **Q. Did Sylvia Baker-Blair take part in the**
2 **P.T.S.D diagnosis?**

3 A. No.

4 **Q. Who --**

5 A. Not that I'm aware.

6 **Q. Who gave you the P.T.S.D diagnosis?**

7 A. That was through the administration, V.A.
8 Administration. That diagnosis came down from them.
9 And I went to -- I had a C&P.

10 **Q. Did you have to see any medical personnel**
11 **when you were obtaining that diagnosis?**

12 A. I went to C&P. That is how. I applied
13 for it, for P.T.S.D., and then you have to go
14 through a process. And that was -- after that then
15 they assign you for a C&P exam.

16 **Q. Tell me about that exam.**

17 A. That is when a doctor who specializes in
18 P.T.S.D listens to you. And you tell her your
19 story, what happened to you, and I did.

20 **Q. And they provided the diagnosis at that**
21 **point?**

22 A. Yes. Uh-huh. I told her about a lot of
23 things. And I cried.

24 **Q. What all were you telling them about?**

25 A. Telling them about what I went through.

1 **Q. In Germany?**

2 A. Yes. I'm not sure if I mentioned the
3 church things or not. I'm not sure. I don't know
4 that I did. I shared that with my counselor.

5 **Q. That was before you received any letter**
6 **from the church?**

7 A. No, I didn't go to counseling until
8 after --

9 **Q. I'm talking about the P.T.S.D diagnosis.**

10 A. That came in July, but I'm not sure what
11 date.

12 **Q. You had already gone through the exam, the**
13 **C&P exam?**

14 A. I'm not sure.

15 **Q. You don't know when you went through that**
16 **exam?**

17 A. All I know is the date that I was awarded.
18 So --

19 **Q. Were you awarded immediately following the**
20 **exam or was it a few weeks?**

21 A. No. No. No. It's a process. It's a
22 process. So apparently it had to be before. I'm
23 not sure.

24 **Q. But do you feel like it was a few months**
25 **before they gave you the diagnosis or was it a few**

1 **days?**

2 A. I went through a process. And when I got
3 the letter it was July that it was awarded, July of
4 2014. So apparently you just don't get the letter
5 saying so. So I know I went through a process.
6 So --

7 **Q. So the -- you would have been seeing and**
8 **applying for this diagnosis for a year?**

9 A. Let me see how long did I apply for. I'm
10 not sure when I applied for P.T.S.D. All I can
11 remember is when I was awarded.

12 **Q. And you don't remember anything about when**
13 **you took the exam?**

14 A. I remember when I took the exam, but I
15 can't remember what -- was it last year I took the
16 exam or before that.

17 **Q. Do you remember if it was winter or spring**
18 **or summer?**

19 A. I really -- that is one thing I never
20 thought about.

21 **Q. But the V.A. would have that -- those**
22 **records?**

23 A. Yes. Yes. Uh-huh.

24 **Q. And you would have told the V.A. that you**
25 **were having a lot of anxiety and a lot of problems**

1 that you were dealing with from these memories from
2 Germany?

3 A. It's not just that, but the P.T.S.D came
4 from that, from the anxiety from Germany.

5 Q. When you went back to counseling in
6 November last year did they change your diagnosis at
7 all?

8 A. No.

9 Q. Did they ever prescribe anything new that
10 they hadn't told you before?

11 A. No.

12 Q. You just saw them and had a chance to talk
13 through things?

14 A. Talk. I don't believe in a lot of
15 medication. I take enough.

16 Q. And how many visits did you make to the
17 counselor?

18 A. Quite a few. But offhand how many times?
19 I don't know. But whenever they were scheduled, I
20 went.

21 Q. And you don't remember how many were
22 scheduled?

23 A. I don't know if I went once a month. I'm
24 not sure. But I went once a month. Whenever was
25 scheduled. We tried -- she tried to set them where

1 they were like a month apart. So after I got
2 through -- after a period I got tired of hearing it,
3 so I just -- I told her I was finished. I'm
4 through. I'm tired of hearing myself whine. And
5 she said, are you ready to go? And I said, I'm
6 ready to go.

7 Q. I've been provided with one record from
8 November 13, 2014, and nothing else. Do you believe
9 you went to the V.A. more than just that one time?

10 A. Oh, yes. I noticed, too, it was the
11 crisis hot line, they had the wrong year on there
12 because --

13 Q. Do you have the records for any additional
14 visits?

15 A. No, but I can get them.

16 Q. And when you went and just kind of talked
17 through things with the counselor you didn't have
18 any change in diagnosis or change in prescription?

19 A. No. I didn't -- no medication.

20 Q. Any other treatment or counseling that you
21 went through other than with the V.A.?

22 A. No, that is it.

23 Q. With the P.T.S.D. diagnosis that you've
24 received from the V.A., does that provide for you
25 the right to counseling whenever needed?

1 A. Yes.

2 Q. At no charge?

3 A. Correct.

4 Q. So the counseling that you went through
5 beginning in November last year, there were no
6 charges for that?

7 A. Correct.

8 MR. BEALE: Peter, let me state for
9 the record I think she probably doesn't realize
10 this, but there is a charge for veterans that comes
11 out of Atlanta. And I'll get those records for you
12 and make sure you have what the bill is for the V.A.

13 MR. FARR: Certainly. And any other
14 treatment records.

15 MR. BEALE: And I apologize. Yeah.
16 And any other treatment records. I apologize. I
17 just don't think she realizes that it exists, but
18 I'll get it for you. And I'll get all the rest of
19 those records, also.

20 BY MR. FARR:

21 Q. V.A. has never sent you a bill for any
22 counseling?

23 A. No.

24 Q. When you went and talked with the V.A.
25 about the time that you were obtaining the P.T.S.D.

1 diagnosis you mentioned that you talked about your
2 time in Germany. Did you also talk through the
3 issues with your separation from your husband or was
4 it just the time in Germany?

5 A. Those are two separate issues there.

6 Q. Right.

7 A. When I went for the P.T.S.D. that had
8 nothing to do with -- that was a separate -- totally
9 separate from --

10 Q. Just related to your military service?

11 A. That's correct.

12 Q. In some of the papers provided by your
13 attorney there was this letter. And I'm just trying
14 to find out is this a letter that you wrote?

15 A. There was a group of us.

16 Q. All of you typed portions of it or did one
17 person author it on behalf of the group?

18 A. I think one person typed this.

19 Q. Who would have typed it?

20 A. I have no idea, but I know I didn't.

21 Q. You did not?

22 A. No.

23 Q. When you would type a letter is it
24 typically something that you would have on your
25 computer and then you would print it out and bring

1 **it?**

2 A. Usually when I type something my signature
3 is on it.

4 **Q. Okay. But you don't have any idea who**
5 **typed that?**

6 A. No.

7 **Q. Were you part of the group --**

8 A. Yes.

9 **Q. -- that is referred to?**

10 A. Yes.

11 **Q. Who all was in the group?**

12 A. I don't have that, but that was the -- let
13 me see. I stand to be corrected. There was quite a
14 few of us on that. You want me to name them?

15 **Q. Yes, please.**

16 A. Okay. - To the best of my knowledge.
17 Myself, Nadine Taylor, Cara Brown, James Brown, but
18 they put those two with their names. Now, let me
19 ask you this. Are you talking about who signed
20 this? Who wrote this?

21 **Q. I'm talking about this letter here that**
22 **says, "We are a group of concerned members," and**
23 **you've identified yourself as part of that group.**

24 A. Yes.

25 **Q. I'm wondering who the group is.**

1 A. Oh, what I'm naming was the people in the
2 past lawsuit, so I can't answer this.

3 **Q. But you are part of the group. And you**
4 **don't have any idea what group you are part of?**

5 A. What I'm saying to you is that I was a
6 part of a lawsuit, but who actually wrote this, I
7 cannot tell you because I don't know, but I was a
8 part of the group of the lawsuit. Now, this is not
9 my writing, my typing.

10 **Q. When was the lawsuit that you are talking**
11 **about?**

12 A. It was -- it was in 2008.

13 **Q. All right. Tell me about that lawsuit.**

14 A. Well, it was -- it really wasn't a lawsuit
15 at first. What we wanted the former pastor to do
16 was do a check and balance. Get all the business
17 and legal aspects of the church in order.

18 **Q. And this letter that is in front of you --**

19 MR. FARR: Why don't we go ahead and
20 mark it as Exhibit 1 just for ease of reference.

21 (Deposition Exhibit 1 marked for
22 identification.)

23 BY MR. FARR:

24 **Q. This letter that is marked as Exhibit 1,**
25 **all of you would have signed it as well?**

1 A. On the lawsuit we did.

2 Q. Okay. But the letter itself was not
3 signed?

4 A. I don't see no signature on here.

5 Q. Was the letter ever delivered to anyone?

6 A. I think it went to church members, but I'm
7 not sure. I'm really am not sure. I can't answer
8 something that I don't know. I really don't know.

9 Q. Is this letter something you agreed with
10 everything that was written?

11 A. Oh, yes. Yes. Because it talks about the
12 financial and business -- may I see it, please?

13 Q. Certainly.

14 A. Okay. The financial and legal business of
15 the church. I remember what our concern was. And
16 that is what our basic concern was the financial and
17 legal business of the church.

18 Q. So you were a part of the group that was
19 saying, here is our position?

20 A. Yes. We met with the pastor.

21 Q. And the letter says no lawsuit has been
22 filed, but there was one filed later, is that what
23 happened?

24 A. Yes.

25 Q. And the group of you had Attorney Beale

1 **involved?**

2 A. Yes.

3 **Q. And tell me about what happened with the**
4 **lawsuit.**

5 A. Well, when we went to Pastor Tucker with
6 our concerns, basically we were ignored. So that is
7 when I took it -- I was up there at Attorney Beale's
8 office one day handling some other matters, legal
9 matters. And I asked, do you handle church matters?
10 And he agreed that yes.

11 So I was telling him about what we were
12 going through at our church. And so he asked me, he
13 said, if you can get the members together I can meet
14 with you guys and talk. So we met. And so all of
15 them came. A good group of them came and they
16 vented their frustrations. And from there it went
17 to -- he wrote a letter to meet with -- talk with
18 Pastor Tucker.

19 **Q. What was the lawsuit about?**

20 A. It was about getting his business and
21 legal matters -- financial matters of the church in
22 order.

23 **Q. When you file a lawsuit you are making a**
24 **claim for something.**

25 A. Right.

1 **Q. What was the claim you were making?**

2 A. Well, that is what we were doing because
3 there was an issue with the money, the finances in
4 the church and the way it was being handled. And I
5 knew it wasn't right. And I could see. I was not
6 blind to see that the way they were handling the
7 money and how they were doing that it just wasn't
8 right.

9 So -- and when Pastor Tucker came, he knew
10 there were some issues within the church. And he
11 said that he promised to make sure that he would do
12 right by the members, but apparently he went and
13 made a left turn. He went to the left instead of
14 the right.

15 **Q. And who exactly did you sue?**

16 A. We didn't sue anyone.

17 **Q. It says a lawsuit was filed on**
18 **February 14, 2008.**

19 A. Yes. But it never went anywhere because
20 of Pastor Tucker.

21 **Q. Once a lawsuit is filed with the court --**

22 A. Okay.

23 **Q. -- you have sued someone.**

24 A. Okay.

25 **Q. Do you understand that?**

1 A. Now. Yes, I do now.

2 **Q. All right. Who did you sue?**

3 A. Pastor Tucker and the officers which was
4 O'Dell Moody, Harry Lee Jones, and Larry Brown. I
5 think those were the three along with Pastor Tucker.

6 **Q. Did you ever try to bring any of these**
7 **matters to a church vote in 2008 before filing the**
8 **lawsuit?**

9 A. Yes. We tried to meet with him.

10 **Q. I'm not saying meet with a pastor. I'm**
11 **saying did you ask the church to vote on it?**

12 A. We couldn't do anything. That is why we
13 were trying to meet with the pastor to talk about
14 our concerns.

15 **Q. Was there ever any sort of church meeting,**
16 **annual meeting that took place?**

17 A. When we had meetings they were short,
18 cut-and-dry. It was like, you know, he didn't want
19 to address our concerns. It was like they were
20 never -- we could never voice our opinion. We could
21 never talk about what needed to be addressed. So
22 most of the time the meetings either were -- he
23 would adjourn the meetings.

24 **Q. The -- were there ever any elections for**
25 **the pastor or for the deacons?**

1 A. Yes. Yes. Not for the pastor. Tucker
2 came he had -- they had a couple of elections on him
3 that I stand to be corrected, but I do remember we
4 voting on -- the first time I couldn't vote on
5 Pastor Tucker, but the second time I was able to
6 vote on him.

7 **Q. Why could you not vote on him?**

8 A. Because Trustee Larry Brown said I
9 couldn't vote on it.

10 **Q. Why not?**

11 A. He said because I didn't put any money in
12 the church.

13 **Q. You went to church and you never tithed or**
14 **gave any money?**

15 A. I didn't give enough.

16 **Q. How much did you give?**

17 A. I would give like \$10 every Sunday or
18 every other Sunday, whatever I had. Mostly was \$10,
19 and I would give it in cash.

20 **Q. And with that church that has long been**
21 **the process is they want you to be giving a certain**
22 **amount in order to fully participate?**

23 A. Yes. It's mostly you have to put in like
24 520 a year or something like that. And I would just
25 give. I would give. I didn't know. See, I

1 wasn't -- I guess meet the requirements to vote at
2 the time. And then -- so I couldn't vote the first
3 time for Pastor Tucker, but I was able to vote the
4 second time.

5 Q. And when the election came up for the
6 deacons, how about that? Were you allowed to vote
7 then?

8 A. We never vote on the deacons.

9 Q. There is never ever any time in the
10 meeting where they --

11 A. All they say is that we make a
12 recommendation that we keep the same officers.

13 Q. Okay. And you vote?

14 A. No. We just -- a person will get up and
15 make the motion and then somebody else will second.

16 Q. And then?

17 A. That is it.

18 Q. They don't say all in favor?

19 A. All in favor? Yes, they will say that.

20 Q. So that is a vote?

21 A. No, that is not a vote. We are supposed
22 to have an election.

23 Q. Do you understand that when a motion is
24 presented and is seconded and then people asked for
25 those in favor of the motion to make some sort of

1 **yeah or nay vote that that is a vote?**

2 A. That is not how it's done by the by-laws.

3 **Q. When that vote took place did anybody ever**
4 **stand up and say, we object to this process?**

5 A. It wouldn't do any good.

6 **Q. So the answer is, no, you didn't?**

7 A. No. It wouldn't do it. Yeah. We had
8 them, and they would record. It was one for, one
9 against, no, but you can't -- it doesn't matter. If
10 you have a motion on the floor, someone can get up
11 and say, let's adjourn, and they will do it.

12 **Q. Was the group that had a problem back in**
13 **2008 the majority of the church?**

14 A. Yes. The majority of the church was in
15 favor.

16 **Q. And so if you had more people in favor**
17 **than there were opposed, and one of you stood up and**
18 **said, we don't want to vote for him, and the**
19 **majority of you then said, no, we do not vote for**
20 **him, do you understand that that would have meant**
21 **the person was not elected?**

22 A. You are asking me -- you are saying three
23 different things. So can you break it down so I can
24 understand what you are saying?

25 **Q. Certainly.**

1 A. Okay.

2 Q. Do you understand that the majority wins
3 in a vote?

4 A. Yes.

5 Q. But you are saying you had a majority in
6 favor of your position?

7 A. What position?

8 Q. That you did not like how the business was
9 being handled and wanted a change in leadership?

10 A. That's correct.

11 Q. And a majority of the members wanted that?

12 A. Yes.

13 Q. But never decided to vote on that?

14 A. I'm still kind of like with the last part
15 of it, it's like you got it twisted.

16 Q. The majority of members who apparently
17 held your position never voted to establish your
18 position; is that correct?

19 A. My position?

20 Q. Yes. For a change.

21 A. The majority of members, all of us came
22 together. And a group of us went to pastor -- to
23 the pastor and talked about our changes. Me and
24 Sister Nadine Taylor, we went together ourselves,
25 but he wouldn't listen to us. We tried to go before

1 the deacons and talk. He would not let us talk with
2 the deacons about our concerns. It was more like it
3 was his way or no way.

4 **Q. Okay. And so nobody stood up and tried to**
5 **vote any of the deacons out?**

6 A. No, because it was like I remember one
7 time under Pastor Tucker that we had a standing
8 vote. And that is the first time that I can recall
9 that being in our church, that I can recall that
10 being like whatever he put on the floor, people
11 stood on it. So you didn't get an accurate head
12 count.

13 **Q. And so your group never voted on these**
14 **issues. It just decided to file a lawsuit because**
15 **your concerns weren't being acted on?**

16 A. There was no need to vote because we
17 couldn't vote. And once you have a motion and a
18 person second it, usually the person that is putting
19 the motion on the floor and the person that seconds
20 it are the person that are for the pastor.

21 **Q. All right.**

22 A. And if you have 10 people that say nay,
23 they are going to shout -- they are going to listen
24 to the nays and not the -- the yeas and not the
25 nays. I apologize. I had that backwards.

1 Q. And no one in your group ever put a motion
2 on the floor and one of the others of the group
3 seconded it to vote on these issues?

4 A. There was no need. You couldn't.

5 Q. So instead of attempting to vote, you just
6 sued them because you weren't getting your way?

7 A. No, it's not getting our way. It's
8 because he would not listen to our concerns.

9 MR. FARR: Now, looking at another
10 document your attorney provided that I'll mark as
11 Exhibit 2.

12 (Deposition Exhibit 2 marked for
13 identification.)

14 BY MR. FARR:

15 Q. This document indicates that you at some
16 point did make a motion in a meeting; is that
17 correct?

18 A. Yes.

19 Q. So you knew the process to do that?

20 A. Yes.

21 Q. Tell me about that motion.

22 A. Well, we had a deacon. And I went to him;
23 Deacon Jones. And I had some concerns. And he
24 wouldn't listen.

25 Q. Same as what had happened in 2008?

1 A. Basically. He wouldn't listen. He
2 just -- you couldn't -- you could not reason with
3 him. He was rude. He just was not a person that
4 you could reason with.

5 Q. And so tell me about your motion.

6 A. It was put to the floor, but there was --
7 of course I was expected to be out voted.

8 Q. Even though you had a majority of members
9 that favored you?

10 A. Yes.

11 Q. Where were all the members that favored
12 you?

13 A. They didn't stand up.

14 Q. So you had the motion. You had the
15 opportunity to vote. And people didn't vote with
16 you?

17 A. They would not do it. As a matter of
18 fact, David Clarkson was one of the ones that was
19 saying that we needed a new deacons board. Quite a
20 few of us saying, we need to change these deacons
21 out. They are no good. They are not listening to
22 the members' concerns.

23 Q. Did you have a written motion in front of
24 you that you were reading off of?

25 A. No. I submitted a letter in a little

1 thing. You have to put everything in writing.

2 **Q. And what was the -- what did you**
3 **specifically list off in the motion?**

4 A. That I make a motion that Deacon Frank
5 Jones be dismissed as the chairman of the Deacons
6 Ministry.

7 **Q. Did you list reasons?**

8 A. Yes.

9 **Q. What were the reasons?**

10 A. His rudeness. He doesn't -- he wouldn't
11 listen. Basically is that he didn't show any
12 concern to my concern that is. And all of my
13 concerns were church matters.

14 **Q. You charged him with rudeness and**
15 **deceitfulness?**

16 A. Yes.

17 **Q. And not listening?**

18 A. Right. There could have been some other
19 things on there, but I -- but I do know he's a
20 very -- very rude.

21 **Q. What did you mean when you accused him of**
22 **being deceitful?**

23 A. He would lie to you. He would tell you if
24 you have a concern and you -- well, I'm going to
25 take it. I'm going to address it to the deacons,

1 and we are going to bring it before the church. It
2 never came before the church.

3 Q. So you in the meeting stood and accused
4 him of being deceitful and rude and not listening?

5 A. I -- yeah. It was read out by the clerk.

6 Q. Your charge was read out?

7 A. Yes. Yes.

8 Q. Did you speak at all on the -- after the
9 motion was read?

10 A. I think I did because I remember being on
11 the floor because when you have a motion you have to
12 stand and state your name. So, yes, I'm the type of
13 person that if I sign something or write something,
14 I'm going to sign it.

15 Q. And you stood and said, yes, that is my
16 motion, and further explained?

17 A. I made a motion, yes.

18 Q. And you then explained to the body what --

19 A. Yes.

20 Q. Why you were making the motion?

21 A. Yes.

22 Q. Told them that you felt he was rude?

23 A. Yes.

24 Q. Told them you felt he was deceitful?

25 A. Right.

1 **Q. Told them you felt he never listened?**

2 A. Yes. And he just needed to be removed as
3 the chairman because he was not doing what he was
4 supposed to do as a chairman of the Deacons
5 Ministry, not listening to the concerns of church
6 matters.

7 **Q. And you lost the vote 23 to five?**

8 A. That's correct.

9 **Q. After this motion in 2010, did anything**
10 **change as far as how things were run by the leaders?**

11 A. No, not that I'm aware of.

12 **Q. And you had tried the democratic process**
13 **and failed?**

14 A. Yes.

15 **Q. And so the membership had spoken that they**
16 **wanted the leadership to continue in the manner it**
17 **was going through their voting actions?**

18 A. Well, let me say this. The members voiced
19 their opinion. It was like whispering. They would
20 whisper to one another about what we don't have. We
21 don't have any deacons to listen to our concerns.
22 And we need to do a clean sweep.

23 **Q. But the way you actually speak is through**
24 **voting, correct?**

25 A. Yes. And when you have a chance to speak

1 up in the meetings, but you have to have a statement
2 there. And you have to put in your proposal. And I
3 do -- I do put my proposals in, but they have to
4 review your proposals before they are brought before
5 the church meetings.

6 And if they feel that they are legit, they
7 have a -- some concerns, then they will bring them
8 before the church body, but very rarely that that
9 happens. Some do, but not all of them get there.

10 **Q. And just like this motion in 2010, the**
11 **chance was there to vote and the vote lost?**

12 A. The vote lost. And the same people that
13 were speaking about his behavior, they did not take
14 a stand. And I mean when I say stand, I don't mean
15 stand up, but didn't vote.

16 MR. BEALE: Let's take a break for a
17 second.

18 MR. FARR: Sure.

19 (Recess 11:28 to 11:36.)

20 BY MR. FARR:

21 **Q. All right. We're back on the record after**
22 **a short break. And we've talked about 2010 when**
23 **there was the situation with Deacon Frank Jones.**
24 **There was your motion that you read and then**
25 **commented on in support of the motion. And then**

1 there was the vote. And following that Deacon Jones
2 was still in his position and time marched on. What
3 was life at the church like after that in 2010?

4 A. I stand to be corrected, the clerk reads
5 the -- the moderator reads your proposals or
6 recommendations or suggestions. Then you get up and
7 you say your reasons why, whatever. But little has
8 changed. To answer your question, little has
9 changed in the church.

10 Q. All right. You were still upset with the
11 leadership of the church following that 2010
12 meeting?

13 A. Disappointed.

14 Q. You still had disputes with how they ran
15 things?

16 A. Correct. Yes.

17 Q. You still would talk amongst yourselves or
18 you would talk with whatever group you happened to
19 be with about your disappointment?

20 A. That's correct.

21 Q. Was Nadine one of the ones that you would
22 have these conversations with, Nadine Taylor?

23 A. Nadine and others. Yes, she was one of
24 them. You are speaking of Nadine Taylor?

25 Q. Yes. She also had the -- did she ever say

1 to you that she felt your concerns were true and she
2 thought Deacon Jones was rude and deceitful?

3 A. Well, she may not have seen it that way,
4 but she agreed with his demeanor.

5 Q. What about his demeanor?

6 A. His ways. He was a very rude man. He was
7 -- I mean, you couldn't -- you can't reason with
8 Deacon Jones. He's not a man you can reason with.

9 Q. In 2010 Travien Capers was not yet at the
10 church, correct?

11 A. I think he came in March of 2010.

12 Q. At the time of that meeting there was an
13 interim pastor?

14 A. That's correct.

15 Q. And, in fact, Nadine Taylor had a motion
16 to have Pastor Ladson remain as interim pastor.
17 That was seconded and voted on and approved?

18 A. Yes.

19 Q. The problems at the church from your
20 perspective predated Travien Capers?

21 A. Yes, uh-huh.

22 Q. And once he came later in 2010 you never
23 had any change in your belief that the church was
24 not being run properly?

25 A. Well, when Pastor Capers came I knew in my

1 heart that I thought he was going to do right as
2 well. I mean, he was going to -- he's a young
3 pastor coming in with new ideas. And I felt that
4 would have been good for the church because we
5 needed to be more updated.

6 **Q. And did things change?**

7 A. A little. Just a little.

8 **Q. Tell me the next time after this meeting**
9 **in 2010 that you recall things coming to a head**
10 **where you felt that you needed to speak out.**

11 A. It wasn't until 2013 I want to say, and I
12 stand to be corrected on that year, when I was in
13 the sanctuary and Deacon Brown approached me. And
14 he said -- he asked me to refrain from asking
15 questions in the church meetings.

16 **Q. Which church meeting?**

17 A. Any church meeting. It didn't matter.

18 **Q. So January 2010 you had spoken, and then**
19 **whenever the next church meeting was --**

20 A. Well, when Pastor Capers came in in 2010
21 there was no -- everything was -- I thought in my
22 opinion it was going along fine.

23 **Q. So you stopped speaking in the meetings**
24 **for a period?**

25 A. Well, we had meetings, but a lot of people

1 weren't coming because it was like he had his
2 agenda. It was short and very timely. And so the
3 members felt that here they are back again, they are
4 not being heard because when he says that his
5 meeting is going to be over within 30 minutes to an
6 hour, it's going to be over with. And they felt
7 that was not enough time to voice your concerns if
8 you had an issue that needed to be addressed.

9 **Q. Did you still show up and voice your**
10 **concerns?**

11 A. Yes, but it wasn't -- I didn't really have
12 too much in a sense to say because I just didn't --
13 I just voiced my concern about something that was --
14 it was about the musician. And his name was
15 Clarence Sims.

16 **Q. And what did you say about Clarence Sims?**

17 A. We were talking about trying to establish
18 a musician. And I was one of the ones that was for
19 him. And that is when I was saying that I don't
20 know why, but this particular Sunday I was just
21 laying around in the sanctuary. And Deacon Brown
22 says, oh, there you are. I wanted to talk with you.
23 I said, you want to talk with me? He said, yes.

24 So we -- he sat down. And he said that he
25 didn't sleep for a week. I should refrain from

1 asking questions, and I should go along with what is
2 going on within the leadership.

3 **Q. That was just a conversation between you**
4 **and Deacon Brown?**

5 A. No. Later -- later Nadine came in on the
6 conversation.

7 **Q. Okay. And did he communicate anything to**
8 **Nadine?**

9 A. Basically the same thing, uh-huh. And
10 they talked about the musician, but my thing was I
11 was going to support the musician because I just
12 thought he was an okay guy.

13 **Q. Did you recall anything Deacon Brown said**
14 **other than asking you to refrain from asking**
15 **questions?**

16 A. After he said it to me, then Nadine came
17 in. And they started talking. And she's more on
18 the musical level as far as she sings in the choir.
19 So they were talking more like that, and he was
20 talking -- there was a conversation there. So --

21 **Q. Anything else that you recall being said?**

22 A. There was a lot, but I just can't recall
23 because it was -- but I do remember him telling me
24 that he couldn't sleep for a week.

25 **Q. What is the next thing that you recall**

1 **having to speak up about?**

2 A. Well, after Pastor Capers got settled in,
3 and I started seeing where there -- here again we
4 didn't have a voice. So -- and I really didn't --
5 and sometimes when we had meetings they were
6 canceled and the meetings were held on Sundays, had
7 Sunday meetings. And they would vote on stuff. And
8 according to our by-laws, we don't do any voting on
9 Sunday. He couldn't get the members to come.

10 So most of the members were at church. He
11 would excuse the visitors from the church. And they
12 would go out and sit in the cars or go out -- some
13 of them would leave or wherever they would go. I
14 don't know because I was inside the church. I can't
15 speculate what they did. But -- and that is when he
16 would address these issues from the pulpit.

17 **Q. So the non-members would leave so that**
18 **everybody could speak freely?**

19 A. Correct. Yes. Where he could present
20 what he wanted to talk about in the church meeting
21 that was postponed or canceled because we didn't
22 have a quorum.

23 **Q. Okay. Your lawsuit has been over**
24 **defamation. I would like for you to go through with**
25 **me and tell me when you were -- when the defamation**

1 happened, each particular instance, so we can talk
2 through those instances.

3 A. Okay.

4 Q. What is the first time that you contend
5 that somebody defamed you, either slander or libel?

6 A. When I got that letter from Pastor Capers.

7 Q. Okay. So prior to that there was nothing
8 that anybody had ever said that you considered to be
9 defamation?

10 A. Not that I'm aware of.

11 Q. And nobody had ever written anything that
12 you considered to be defamation?

13 A. About me?

14 Q. Right.

15 A. No.

16 Q. Let me just make sure I am clear with you.

17 (Deposition Exhibit 3 marked for
18 identification.)

19 BY MR. FARR:

20 Q. And I know it was marked yesterday, but
21 I'll go ahead and mark it again. When you reference
22 the letter that is the first instance of any
23 defamation you are talking about the August 30,
24 2014, letter that is marked as Exhibit 3 here?

25 A. Yes.

1 Q. Okay. Prior to that there was no
2 defamation or slander or anything written about you
3 or anything like that?

4 A. Not that I'm aware of.

5 Q. Okay. Your lawsuit is over this letter
6 and the meeting or is it just the letter?

7 A. The meeting?

8 Q. Is it -- well, let's start with the
9 letter.

10 A. Which letter? This letter?

11 Q. This letter right here.

12 A. Okay.

13 Q. Is this the only written defamation that
14 you are aware of?

15 A. No. There is another one.

16 Q. Okay. What other?

17 A. There is the one that Pastor Caper sent
18 me. This was -- it was not a defamation, but it was
19 the one requesting to meet with me.

20 Q. Okay. I understand there may have been
21 other communication.

22 A. Okay. Okay.

23 Q. And forgive me for my poor question. My
24 question to you is is there anything that has been
25 written that you consider to be defamatory to you

1 **apart from this letter?**

2 A. No, not that I'm aware of.

3 **Q. Is there anything that has been spoken**
4 **that you consider to be defamatory to you apart from**
5 **this letter?**

6 A. In the past pertaining to Zion Benevolent
7 I have been called a troublemaker. Here comes
8 trouble.

9 **Q. Well, we get into this spoken stuff in a**
10 **minute then.**

11 A. Okay.

12 **Q. Let's start with this letter.**

13 A. Okay.

14 **Q. That may make things easier for us to work**
15 **through.**

16 A. Okay.

17 **Q. All right. So once again Exhibit 3, which**
18 **is a letter dated August 30, 2014, that I believe**
19 **you received in the mail sometime after**
20 **September 10, 2014?**

21 A. Correct.

22 **Q. Is the letter that you are referring to?**

23 A. Yes.

24 **Q. And that is the only written thing that**
25 **you are aware of that slanders you in any way?**

1 A. Yes.

2 Q. Or that defames you in any way?

3 A. Yes.

4 Q. This letter is addressed to you, correct?

5 A. Correct.

6 Q. It was mailed to you, correct?

7 A. Yes.

8 Q. Are you aware of it being mailed to anyone
9 else?

10 A. Not that I'm aware of.

11 Q. So it came just to you?

12 A. Yes. That I'm aware of.

13 Q. And I just want to slowly walk through the
14 letter.

15 A. Okay.

16 Q. And I want you to tell me each point that
17 you consider to be defamatory in the letter.

18 A. Okay.

19 Q. So if you want to start from the top, if
20 you just want to read and as you go tell me when you
21 come across something.

22 A. "From the inception of the Christian
23 church early in the first century, men and women of
24 conviction have been the cornerstone of church
25 administration. The writers of the New Testament

1 have given instruction on how the church should
2 function from the pulpit to the pew. At times,
3 Biblical instruction is not always followed and
4 respect for the sanctity of the House of God is
5 forgotten. To this end, we write to you.

6 For years now, your presence and
7 demonstrative actions have been the topic of adverse
8 conversations around our church. Your deliberate
9 disrespect for church administration and ignorance
10 to scriptural protocol has wearied the heart of the
11 faithful, and the church administrations has decided
12 to no longer stand idly by as if such behaviors are
13 condoned.

14
15 MR. BEALE: If you want to just read
16 that to yourself."

17 Right here I feel that -- "Again, the
18 church is tired of the disruptions caused in
19 meetings, the argumentative nature and disrespect
20 shown to church officials -- "

21 COURT REPORTER: Could you speak up
22 just a little bit?

23 THE WITNESS: Oh, okay.

24 MR. BEALE: If you want to just read
25 that to yourself, maybe that would be simpler.

1 MR. FARR: Yeah, that may be easier.

2 MR. BEALE: Because he's having to
3 take all of this down.

4 THE WITNESS: Oh, okay.

5 MR. BEALE: So just read it to
6 yourself, and then you can answer his question.
7 That would probably be easier.

8 THE WITNESS: Oh, okay. Okay.

9 MR. FARR: All right.

10 MR. BEALE: Is that okay with you?

11 MR. FARR: Yeah, that is fine.

12 BY MR. FARR:

13 Q. And you tell me what will be easier. Do
14 you want to stop as you get to a point and discuss
15 that?

16 A. Yes.

17 Q. Or do you want to read the whole thing and
18 then go back?

19 A. I would rather like break it down --

20 Q. Okay.

21 A. -- because I'm not too sure.

22 Q. All right. So you've read now through the
23 first paragraph?

24 A. Yes.

25 Q. And the first paragraph you have nothing

1 that you feel defames you?

2 A. I'm trying to figure out when it says,
3 from the inception of the Christian -- early --
4 church early in the first century.

5 Q. That is not talking about you.

6 A. Okay. Okay.

7 Q. Is that -- you don't see anything in that
8 first paragraph that talks --

9 A. Okay.

10 Q. -- negatively about you, do you?

11 A. Okay. Okay. Okay. The second paragraph
12 does.

13 Q. Okay. What is -- what is particularly
14 written, and I just want you to read the exact
15 language that is here, and tell me -- that you say
16 defames you?

17 A. My presence and actions have been a topic
18 of conversations around the church.

19 Q. All right. So when they write to you and
20 say, "Your presence and demonstrative actions have
21 been the topic of adverse conversations around our
22 church," that is a sentence that you feel defames
23 you?

24 A. Yes. Uh-huh.

25 Q. Okay. All right. And we will continue

1 on. How about the next sentence?

2 A. The next paragraph -- the next -- not the
3 next -- the next sentence.

4 Q. Okay. The one that begins, "You're
5 deliberate"?

6 A. Yes. Uh-huh.

7 Q. Okay. That entire sentence?

8 A. That entire sentence.

9 Q. Okay. How about the following sentence?

10 A. The next one.

11 Q. That is another one that does?

12 A. Yes.

13 Q. The one that begins, "Again, the church is
14 tired"?

15 A. Yes.

16 Q. All right. How about the next sentence?

17 A. Yes, the next one as well.

18 Q. Where it says, "We write to share with you
19 what the Holy Bible records about such decisions and
20 the conclusions to which we, the undersigned, have
21 arrived"?

22 A. Yes.

23 Q. That sentence defames you?

24 A. Not -- well, the next one. Okay. In the
25 context of --

1 Q. Okay. And we will get to that one in a
2 minute.

3 A. Okay.

4 Q. But in Paragraph 2 now --

5 A. Okay. You are still with two?

6 Q. Yes. In paragraph --

7 A. Okay. Okay. I apologize. I'm getting
8 ahead.

9 Q. That's all right. I'm just trying to
10 slowly plod through this.

11 A. Okay.

12 Q. In Paragraph 2 your testimony is that
13 Sentences Number 1, 2, and 3 all defame you?

14 A. And also what they write with the Holy
15 Bible, what have they interpreted the Holy Bible
16 towards me.

17 Q. Okay. So all of Paragraph 2 --

18 A. Yes.

19 Q. -- is what you consider defamatory?

20 A. Yes.

21 Q. All right. Let's move to Paragraph 3.

22 A. That whole paragraph.

23 Q. All right. Let's move on to Paragraph 4
24 that goes onto the next page..

25 A. Okay.

1 Q. It begins, "In examination of"?

2 A. Yes. That one as well.

3 Q. All right. And then the quote from
4 Hebrews isn't defamatory, is it?

5 A. I think it's in the context of the way
6 he's -- has written it.

7 Q. All right. Moving on to Paragraph 5 that
8 begins with the word "Finally"?

9 A. Very much so, yes.

10 Q. And then how about Paragraph 6 that begins
11 with the word, "Finally, 1 Corinthians 5:13
12 records"?

13 A. Very much.

14 Q. Okay. Your testimony would be that the
15 items here in Paragraphs 2 through 6 are not true;
16 is that correct?

17 A. Can you rephrase that, please?

18 Q. Certainly. You've testified now that you
19 believe Paragraphs 2 through 6 of this letter are
20 defamatory?

21 A. Very much.

22 Q. You believe that what is stated in those
23 paragraphs is not true?

24 A. True.

25 Q. When you received this letter it was sent

1 to you by the leadership of the church?

2 A. Yes.

3 Q. And they are the ones who you would expect
4 to properly carry out church administration?

5 A. I'm not sure what you are asking me.

6 Q. Sure. You would expect those people to be
7 the ones to properly lead the church?

8 A. No, not all of them.

9 Q. And I'm not talking about the individuals.
10 I'm talking about the office that they held. Is
11 that who you believe would be the people -- the
12 offices that should properly lead the church?

13 A. The deacons and the pastor.

14 Q. And you believe they would be the ones to
15 properly --

16 A. They were supposed to be the spiritual
17 leaders, yes.

18 Q. Properly run the church?

19 A. Yes.

20 Q. Properly handle discipline?

21 A. Yes.

22 Q. Properly lead the church where it needs to
23 go?

24 A. If it's done in a correct manner, yes.

25 Q. And those were the offices that these

1 individuals held?

2 A. Yes.

3 Q. Is there anyone who has signed this letter
4 that you don't have of?

5 A. It's not that I -- it's just the way they
6 are running things at the church. There are not
7 checks and balances. And personally as individuals
8 I don't have problems with them, but I have problems
9 with the way they handle the church affairs,
10 business affairs. And if you've got a concern you
11 are supposed to use the chain of command.

12 Q. Is there anyone who signed this letter
13 that you do not feel is responsible for the letter?

14 A. Responsible as in what way?

15 Q. For --

16 A. Their mind? The state of mind?

17 Q. For the words -- for the words in the
18 letter.

19 A. I have no idea because they signed it.

20 Q. Okay. Now, looking through that letter
21 that is marked as Exhibit 3, the two-page letter. I
22 want to kind of slowly walk through the statements
23 themselves now. We've looked at them in general and
24 mentioned the paragraphs that have the language. I
25 want to, if we can, boil down to what is it -- what

1 is it that is being said.

2 And if you need to take a break, let me
3 know. I'm happy to do that. Are you good to carry
4 on or do you want to take a few minutes?

5 A. It's not going to stop it, so I'll go.

6 Q. Okay. If you do need to take one, if you
7 just want to walk out that's -- we'll go off the
8 record at that point.

9 Looking at Paragraph 2, they are talking
10 about actions of disrespect, being argumentative,
11 and being disruptive. Is that what your
12 understanding of that paragraph says?

13 A. Yes.

14 Q. All right. So disrespect, argumentative,
15 disruptive. Is there anything else that is being
16 said about you other than those three things in that
17 paragraph?

18 A. Ignorance.

19 MR. BEALE: What was that? I'm
20 sorry. I couldn't understand you.

21 MR. FARR: Ignorance. There is -- on
22 Line 3 of the letter -- of the paragraph.

23 THE WITNESS: Excuse me. I need some
24 tissues.

25 MR. FARR: Certainly.

1 THE WITNESS: Habitual.

2 BY MR. FARR:

3 Q. You are talking about habitual desire to
4 turn church affairs into legal matters?

5 A. Yes.

6 Q. What do you feel that is saying about you?

7 A. That I'm quick to run to a lawyer than try
8 to resolve the issue myself.

9 Q. Do you think they said that based on your
10 prior dealings with the lawyer and bringing Attorney
11 Beale into the matter?

12 A. This is what Pastor Capers did because if
13 it wasn't for the stand he wouldn't be the pastor of
14 the church. If it wasn't for the movement he would
15 not have ever been one of the candidates because we
16 had a process of selecting pastors, and so he was
17 one of the top two.

18 Q. All right. So just to review now, you
19 feel that Paragraph 2 accuses you of being
20 disrespectful, argumentative, disruptive, ignorant
21 of Scriptural protocol?

22 A. Yes.

23 Q. And quick to run to a lawyer?

24 A. Yes.

25 Q. Anything else that you feel that that

1 particular paragraph is saying about you? I'm
2 sorry. I didn't hear you.

3 A. Say it again?

4 Q. Okay. Anything else that you feel
5 Paragraph 2 says about you other than those five
6 things?

7 A. No.

8 Q. Is that a no?

9 A. No.

10 Q. Okay. Moving on to Paragraph 3 now. What
11 do you feel Paragraph 3 is saying about you that is
12 defamatory?

13 A. That I'm a troublemaker. That is what I
14 get out of that. Always starting confusion.

15 Q. Anything else?

16 A. Displeasing with my presence.

17 Q. Okay.

18 A. Because they don't end peacefully.

19 Q. Anything else you feel that that paragraph
20 is saying other than you being a troublemaker?

21 A. Talking about my unbecoming behavior.

22 Q. Do you feel that is the same as
23 troublemaker or is that something different?

24 A. It could be the same.

25 Q. Do you feel that anything is being said

1 other than troublemaker in Paragraph 3?

2 A. And it's like displeasure is like they hate
3 to see me. I feel like they hate to see my
4 presence. That is the way I take that.

5 Q. Because?

6 A. Of being a person that is standing up for
7 the church.

8 Q. Okay. So you feel that there they are
9 saying because you are a troublemaker we don't want
10 to see you?

11 A. Right.

12 Q. And other than troublemaker, there is not
13 anything else that they are saying about you in that
14 paragraph. Is that your understanding?

15 A. They are saying this about me.

16 Q. Saying what?

17 A. What you just asked me about.

18 Q. That they feel you are a troublemaker?

19 A. Yes.

20 Q. And that makes them displeased to see you?

21 A. Right.

22 Q. Paragraph 4, what is that -- what do you
23 feel that is saying about you?

24 A. That I don't have the right to speak up in
25 the church because I'm not -- I'm a nobody.

1 Q. And I don't -- I want to make sure I'm
2 clear with my question. I don't -- I don't want to
3 ask you what you feel they are trying to communicate
4 to you. I want you to tell me what you feel they
5 are saying defamatory about you. Do you understand
6 the difference of what I'm asking there?

7 A. I think so.

8 Q. Okay. What do you feel in Paragraph 4
9 they are saying about you that you think is false
10 and defamatory?

11 A. Disrespectful of authority, of their
12 leadership.

13 Q. So in Paragraph 4 you feel they are
14 calling you disrespectful?

15 A. Yes.

16 Q. Anything else?

17 A. And that I don't have a voice.

18 Q. Okay. They are calling you not having a
19 voice?

20 A. Yes. I feel like I'm a nobody because I'm
21 not an officer.

22 Q. Okay.

23 A. Yeah.

24 Q. So they are calling you disrespectful and
25 they are calling you not an officer, so not having a

1 voice?

2 A. Yes. And assuming an authoritative voice
3 when I'm not an officer of the church.

4 Q. So usurping authority, is that how you
5 understand that to be?

6 A. I'm just asking questions.

7 Q. Okay.

8 A. Voicing my concerns.

9 Q. Anything else in Paragraph 4 that you feel
10 they are calling you other than disrespectful and
11 assuming an authoritative voice without being an
12 officer?

13 A. I'm just trying to figure out in
14 Paragraph 4 that they want me to be a yes person.

15 Q. Okay. And, again, I'm not trying to --
16 I'm not trying to get you to say what you feel they
17 are asking you to do. I'm more interested in what
18 you feel they are calling you or saying about you
19 that is false and defamatory.

20 A. Okay.

21 Q. So we talked about they feel you are
22 disrespectful and you feel that is false and
23 defamatory?

24 A. Yes.

25 Q. They say that you are not an officer, but

1 **you are assuming an authoritative voice?**

2 A. Right.

3 **Q. And you feel that is false and defamatory?**

4 A. Well, I'm not an officer. I'm a member of
5 the church.

6 **Q. But you feel that saying that you have**
7 **assumed an authoritative voice is false?**

8 A. Yes.

9 **Q. Okay. All right. And that is all for**
10 **Paragraph 4?**

11 A. Yes, that is 4.

12 **Q. And moving on now to Paragraph 5. What do**
13 **you feel they are saying about you in Paragraph 5**
14 **that is false and defamatory?**

15 A. I'm unworthy.

16 **Q. And what part are they saying -- where do**
17 **they say that you are unworthy?**

18 A. Do you know -- do you not know that the
19 saints should judge the world and that the world
20 should be judged by you. You are unworthy to judge
21 the smallest matters.

22 **Q. That -- they are quoting a passage of**
23 **Scripture, correct?**

24 A. Yes. But I think they are taking it out
25 of context. That is my opinion. And I feel like

1 this is me, that I am considered unworthy.

2 Q. All right. Anything else you feel is
3 being said about you?

4 A. Yes. I speak to your shame.

5 Q. Do you understand that is still part of
6 the 1 Corinthians passage?

7 A. Yes. Yes. Yes. It's like my behavior is
8 shameful.

9 Q. All right. Anything else?

10 A. Yes. A heathen and a publican.

11 Q. And where is that?

12 A. It's the last.

13 Q. Okay. And that is again taken from a
14 passage of Scripture?

15 A. Yes.

16 MR. BEALE: A heathen and a what?

17 THE WITNESS: Publican.

18 BY MR. FARR:

19 Q. Anything else you feel Paragraph 5 is
20 saying about you other than that you are unworthy,
21 shameful, heathen, and publican?

22 A. Yes. Publican, uh-huh.

23 Q. Anything else you feel Paragraph 5 is
24 saying?

25 A. No.

1 Q. And Paragraph 6, what do you feel that
2 Paragraph 6 is saying about you that you feel is
3 false?

4 A. Wicked. They should put me away. A
5 wicked person.

6 Q. Anything else?

7 A. Yes. Rescinding my membership.

8 Q. What are they -- what are they saying
9 there that is false?

10 A. Because I'm a wicked person.

11 Q. Okay. So wicked is what you feel is false
12 and defamatory?

13 A. Yes. Uh-huh.

14 Q. What else in that paragraph that you feel
15 is false and defamatory?

16 A. Mostly that, putting away that wicked
17 person. And I'm trying to figure out where they
18 want to put me. I know where they are putting me
19 out at.

20 Q. So going back through Paragraphs 2 through
21 6 is where the defamatory language is. And other
22 than what you've just told me for each of those
23 paragraphs, do you feel there is anything else that
24 is false and defamatory in this letter that we
25 haven't mentioned?

1 A. Not that I can think of pertaining to me,
2 no more than when they are officially
3 excommunicating me.

4 Q. I'm going to read through the list that
5 you just gave me again, and then I'm going to ask
6 you some questions about it.

7 A. Okay.

8 MR. BEALE: I object to that. I just
9 ask you to do one at a time.

10 MR. FARR: Okay. Certainly.

11 MR. BEALE: Because that's a bit
12 overwhelming. It's a lot of material you just
13 covered.

14 BY MR. FARR:

15 Q. Fair enough. When they talk about -- when
16 they express things in the letter that you feel is
17 calling you disrespectful, are they saying anything
18 about your ability to perform your job?

19 A. They never said anything about my job.
20 They are talking about my -- disrespectful, it's
21 like when I have an issue I address it.

22 Q. Okay. All of these things in this letter,
23 does it say anything in the letter anywhere about
24 you not being able to be fit for your job?

25 A. No.

1 Q. Does it say --

2 MR. BEALE: Will you clarify job?

3 BY MR. FARR:

4 Q. Sure. Your profession.

5 A. My profession at the church?

6 Q. No, what you do for a living.

7 A. No, I'm not -- no.

8 Q. Does anything in this letter say anything
9 about you being somehow adulterous or unfaithful or
10 not chaste?

11 A. No.

12 Q. Does anything in this letter say -- accuse
13 you at all of having some disease?

14 A. No.

15 Q. Does anything in this letter accuse you of
16 a criminal act under the laws of the State?

17 A. No.

18 Q. Does anything in this letter address
19 conduct other than what was being told you about the
20 church meetings or is it all related to the church
21 meetings that they are talking about?

22 A. All related to the church meetings.

23 Q. When you received this letter and read it,
24 it hurt your feelings?

25 MR. BEALE: Object to the form of the

1 question.

2 BY MR. FARR:

3 Q. Did it hurt your feelings when you
4 received the letter and read it?

5 A. Yes.

6 Q. What other ways did it damage you other
7 than hurting your feelings?

8 A. I was disappointed.

9 Q. Anything else?

10 A. Humiliated, embarrassed, public
11 humiliation.

12 Q. Now, with the letter, where were you when
13 you got it?

14 A. I was in my yard.

15 Q. You read it then?

16 A. Yes.

17 Q. Was anybody reading it with you?

18 A. No. No.

19 Q. So at the time you were reading it there
20 wasn't anything public about it, correct?

21 A. I don't know. I was reading it. I don't
22 know what -- on the other end. I can't speak for
23 the other end.

24 Q. You are not aware of the letter going to
25 anyone else, correct?

1 A. No.

2 Q. Have you ever heard of anyone else
3 receiving a copy of the letter?

4 A. Not that -- no.

5 Q. Any other damage that the letter caused
6 apart from what you just mentioned about hurting
7 your feelings, being humiliated, being upset?

8 A. Embarrassed.

9 Q. Being embarrassed. Anything else?

10 A. Not that I can think of. Well, I smile
11 when I'm out, but I cry when I'm alone.

12 Q. All right. Let's move on at this point
13 and get back to talking about any other defamation.
14 Apart from this letter, what else has been written
15 or said that you feel defames you?

16 A. The letter that Pastor asked to meet with
17 me.

18 Q. Okay. He sent you an e-mail?

19 A. Yes.

20 Q. When was that?

21 A. The next day after the meeting, July the
22 22nd.

23 Q. All right. So there was an e-mail to you
24 on July 22?

25 A. That's correct.

1 Q. Who all did it go to? Just you?

2 A. I have no idea. I really don't.

3 Q. All right. What was in the e-mail that
4 you felt defamed you?

5 A. Oh, goodness. That he had gotten -- I'm
6 trying to remember now. That he had gotten several
7 calls about my behavior, which I didn't think
8 nothing was wrong with it. And that I was a topic
9 of -- there was so much he had written. And he was
10 entertaining gossip. There was so much that he
11 said.

12 Q. So he, in an e-mail to you, wrote that he
13 had gotten calls about your behavior?

14 A. Yes.

15 Q. Did you feel that was false, that he had
16 not gotten calls?

17 A. Oh, I don't know. I really don't know.

18 Q. And what else was said in there that you
19 felt was defamatory?

20 A. I don't know. I would have to get the
21 letter for you.

22 Q. I may be missing it. I'm not sure I have
23 that. I take that back. Is that the e-mail you are
24 talking about?

25 A. Yes.

1 MR. FARR: Let me run and make a copy
2 of it real quick.

3 (Recess 12:20 to 12:22.)

4 (Deposition Exhibit 4 marked for
5 identification.)

6 BY MR. FARR:

7 Q. All right. I'm going to go back on the
8 record now. I'm going to show you what I've marked
9 as Exhibit 4.

10 MR. FARR: You want a copy?

11 MR. BEALE: Uh-huh.

12 BY MR. FARR:

13 Q. That is the e-mail that you were
14 testifying to was another instance that you believe
15 you were defamed?

16 A. Yes.

17 Q. This went from Travien Capers to you?

18 A. Yes.

19 Q. And is there anyone else who received the
20 e-mail other than you?

21 A. Just according to this it came from him to
22 me.

23 Q. Your e-mail address is the
24 soso24@bellsouth.net?

25 A. Correct.

1 Q. And, again, same thing we did with the
2 letter in Exhibit 3. I'm going to ask you to go
3 through this e-mail that is marked as Exhibit 4.
4 And as you come across something that you believe is
5 false and defamatory, if you will go ahead and let
6 me know?

7 A. This whole letter is false.

8 Q. All right. We will just walk through
9 line-by-line then.

10 A. Okay.

11 Q. First sentence. Is there anything in the
12 first sentence that you believe is false and
13 defamatory?

14 A. I tried to figure out God's mercies have
15 been renewed for me. Excuse me.

16 MR. FARR: Go off the record a
17 second.

18 (Discussion off the record.)

19 BY MR. FARR:

20 Q. All right. Back on the record. With this
21 e-mail of July 22 that is marked as Exhibit 4, the
22 first sentence is, "I pray your day is going well
23 and God's mercies have been renewed for you." In
24 that sentence do you believe there is anything false
25 and defamatory?

1 A. I'm trying to figure that one out. I
2 understand prayers, but God's mercy.

3 **Q. Is there anything that you feel is false**
4 **said about you in that sentence?**

5 A. God's mercy has been renewed for me.

6 **Q. That he prays that God's mercies have been**
7 **renewed?**

8 A. Yeah. I didn't know God's mercies had not
9 been.

10 **Q. So you believe that is false?**

11 A. Yeah. Because I'm not understanding what
12 he is saying.

13 **Q. Okay. What do you feel he's saying about**
14 **you in that sentence?**

15 A. Well, he's praying that my day -- my day
16 is going well that day and God's mercies have been
17 renewed for you. And I'm trying to figure out what
18 does he mean by God's mercy.

19 **Q. So as you read this e-mail you are not**
20 **aware of anything that is defamatory. You are just**
21 **not sure what he means?**

22 A. No. I'm -- I'm not certain why I got the
23 e-mail.

24 **Q. Okay. How about the second sentence?**
25 **What do you feel is false about you in that**

1 **sentence?**

2 A. Well, there is nothing. He just said he
3 wanted to meet and speak with me concerning a few
4 matters.

5 Q. All right. How about the third sentence?
6 What do you feel is false in that sentence?

7 A. The meeting that was disappointing.

8 Q. That is false?

9 A. Yes.

10 Q. It was not a disappointing meeting?

11 A. I didn't think so.

12 Q. Disappointing would be how he felt about
13 the meeting?

14 A. Yes.

15 Q. So it's not false about you. It's false
16 about the meeting?

17 A. It's not -- I guess what I'm saying is I
18 didn't realize the meeting was disappointing until I
19 got this e-mail.

20 Q. All right. But he's not saying anything
21 false about you in that sentence; is that correct?

22 A. Not yet to speak with me and last night,
23 this morning concerning exchanges.

24 Q. Okay. Is there anything false about you
25 up to that point?

1 A. No more than -- well, I just already
2 covered about God's mercy. No.

3 Q. Okay. All right. Moving on to the next
4 sentence where he says that he would like to speak
5 with you and possibly your husband, is there
6 anything false up to that point?

7 A. No.

8 Q. How about the next portion of the sentence
9 where he says, what seems to be a habitual cycle of
10 what are being seen as disruptions in the church's
11 formal meetings?

12 A. Yes. Disruption and disrespect.

13 Q. All right. So you feel he's calling you
14 disruptive and disrespectful?

15 A. Very. Yes.

16 Q. All right. What else in that sentence,
17 anything?

18 A. No. No more than that.

19 Q. All right. How about the next sentence?
20 What do you feel he is saying about you there?

21 A. That I don't have a Christian character.

22 Q. Okay. You are moving to the sentence that
23 begins the following paragraph?

24 A. Yes, uh-huh.

25 Q. All right.

1 A. And that is false because I raised -- in
2 the church meetings you just don't get up and shout.
3 You have to stand to your feet. They give you the
4 mic, and you identify yourself. And I do follow the
5 proper protocol. You just don't shout out. You
6 have to state your name.

7 **Q. Anything you feel that he said to you that**
8 **is false and defamatory up to that point other than**
9 **that you are disruptive, disrespectful, and lack a**
10 **Christian character?**

11 A. Yes. That is -- that is defamatory when
12 he says I don't -- I reflect -- I respect -- like I
13 don't have a Christian character. And if I have a
14 question, please raise them. And I did it in the
15 manner that -- first of all, we didn't have a mic,
16 so you can't hear.

17 So everybody was yelling. Not -- we don't
18 have a mic. We can't hear her. So they went and
19 got a mic. And they gave me the mic. And I stated
20 my name, and I presented my question.

21 **Q. The next sentence talks about comments**
22 **being made that challenge the personal integrity of**
23 **one of our officers. What comment was that?**

24 A. I said to Pastor Capers when I asked
25 Deacon Brown a question. I don't know exactly what

1 the question was. And he walked off to keep from
2 answering it. And I said to Pastor Capers, "See
3 what kind of deacon you have."

4 **Q. What did you mean by that?**

5 A. He didn't answer the question. To keep
6 from answering the question he walked off. And that
7 is the problem that we have with our deacons.

8 **Q. What do you feel that conduct was saying**
9 **about him that you wanted to communicate through**
10 **your sentence?**

11 A. I'm trying to think. It had to do with --
12 I don't know if it was the construction --

13 **Q. How would you characterize his behavior**
14 **that you were trying to communicate to Pastor**
15 **Capers?**

16 A. How would I challenge Deacon Brown or
17 Pastor Capers' behavior?

18 **Q. How would you characterize Deacon Brown's**
19 **behavior to show what you meant by your statement**
20 **about, see what kind of deacon you have?**

21 A. He was being evasive because when -- I
22 don't remember exactly what the question was, but he
23 kept saying something about the County has to do
24 this and the County because it had to do with
25 something pertaining to construction of the church,

1 of Zion Benevolent Baptist Church.

2 And he kept saying something about the
3 County have to do this and before we could do this
4 the County got to come by and do this. He was never
5 giving -- he would never give you a straight answer
6 to your question.

7 So at that time I was on my feet, and I
8 had the mic. And I said to Pastor Capers, you see
9 what kind -- when he walked off, never answered my
10 question, I said, see what kind of deacon you have.

11 **Q. Do you think that was an appropriate**
12 **comment?**

13 A. Yes.

14 **Q. For a meeting?**

15 A. Yes. Because it wasn't -- I wasn't being
16 loud or disrespectful. I just said, see what kind
17 of deacon you have, because he wouldn't answer the
18 question that was presented. Even if they don't
19 answer a question, normally they say, if I don't
20 know the answer I will get back with you.

21 And I really think what it was -- now it's
22 coming back to me. I could be wrong, but when they
23 were doing the construction of the church I asked
24 about the asbestos. And they said that they had
25 done a survey.

1 And I asked to see the survey. They told
2 me I could see it, but I had to come in the office
3 to see it, alone that is. And I said, no, bring it
4 out here so the rest of the members could see it as
5 well.

6 **Q. Moving on through the e-mail now, what is**
7 **the next thing you see that you feel is false and**
8 **defamatory?**

9 A. I don't see the problem, but it's like my
10 disposition and the church is having unrest about
11 it.

12 **Q. Where is that at?**

13 A. The last.

14 **Q. You feel that he is saying that you are**
15 **causing unrest in the church?**

16 A. Yes, uh-huh.

17 **Q. And just so I can make sure I'm clear, in**
18 **this e-mail dated July 22, 2014, you believe that**
19 **you are being called disruptive, disrespectful,**
20 **lacking a Christian character, and causing unrest in**
21 **the church?**

22 A. Correct.

23 **Q. Anything else you feel is being said about**
24 **you that is false and defamatory?**

25 A. No.

1 Q. And this e-mail went just to you?

2 A. That I'm aware of.

3 Q. All right. Now, other than Exhibit 3,
4 which was the letter dated August 30, and Exhibit 4,
5 which was the e-mail dated July 22, are you aware of
6 any other written communication that was disruptive
7 to you -- I mean that was defamatory to you?

8 A. No.

9 Q. How about any spoken words that were
10 defamatory to you at any point by the people you
11 have sued?

12 A. Trustee Larry Brown after Pastor Tucker
13 was ousted from the church -- and I don't mean to be
14 disrespectful in what I'm saying. I'm just quoting
15 his words. He said, "I'm going to fuck you up."

16 Q. And when did he say that?

17 A. After Pastor Tucker was ousted from the
18 church, and I think he was ousted in 2000.

19 Q. Okay. So back in 2000 --

20 A. Yes.

21 Q. -- you felt --

22 A. 2008 to be correct.

23 Q. Okay. In 2008?

24 A. Uh-huh.

25 Q. Seven years ago you feel that there was

1 **something that was said that was defamatory to you?**

2 A. Yes. And because of getting a counsel,
3 and because of Larry Brown has a history of
4 shooting, and he's kind of like a bully, I just
5 don't trust his state of mind.

6 **Q. Did you ever sue him for that statement?**

7 A. No. No.

8 **Q. And that is not part of this lawsuit?**

9 A. No. No. What it is, Deacon O.J. Moody
10 and Deacon Robert Anderson quickly defused the
11 situation.

12 **Q. And I'm referring to the current lawsuit.**

13 A. Okay.

14 **Q. What are you suing these individuals for**
15 **as far as any spoken words or is it just the**
16 **written?**

17 A. Can I see the -- one of -- the letter --
18 the letter that -- this one right here, if I can
19 look at it.

20 **Q. Okay.**

21 A. What I know is strictly hearsay.

22 **Q. Okay. So you are not -- as far as your**
23 **lawsuit goes, the only defamation is the two**
24 **letters --**

25 A. Yes.

1 Q. -- that we've looked at?

2 A. Yes.

3 Q. Nothing else?

4 A. Nothing that I could say, you know.

5 Q. No other spoken words said about you that
6 you feel are defamatory?

7 A. Well, they didn't say anything, but
8 Trustee Lever Thompson and James Randolph saw me at
9 McDonald's, and they laughed in my face. And I knew
10 it was me because I was the only person around. I
11 was talking to another person that I knew, and they
12 were in the company of that person.

13 Q. When was that that they laughed?

14 A. It was after I was served.

15 Q. After you were served with what?

16 A. This letter.

17 Q. Okay.

18 A. They are normally at McDonald's on Garners
19 Ferry.

20 Q. All right. So they were over there. They
21 laughed, and you felt that was directed toward you?

22 A. Yes. Yes. Like it was funny that I was
23 put out of the church.

24 Q. Anything else spoken by any of these
25 people that you are suing for being defamatory?

1 A. No.

2 Q. All right. So your entire lawsuit relates
3 to Exhibit 3 and Exhibit 4?

4 A. Yes.

5 Q. When you received the letter that is
6 marked as Exhibit 3 you mentioned your reaction
7 initially as far as the feelings that you had. Once
8 that moment passed what did you do as far as talking
9 to anyone or writing anything? What did you do?

10 A. I took it to Attorney Beale.

11 Q. Okay. Did you ever communicate with
12 anyone else about the letter other than Attorney
13 Beale?

14 A. The night before -- this was September the
15 11th, 9/11. September the 8th is when we had the
16 special called meeting. And in that called meeting
17 Pastor Capers was very angry, very angry. And he
18 had a letter in his hand. I don't know what --
19 which letter it was, but he was waving a letter.
20 And he said -- he said all kinds of things. I could
21 tell he was a mad man.

22 Q. And I'm talking about after you received
23 the letter.

24 A. I'm going back -- it's going to lead up to
25 this.

1 Q. Okay. Go ahead.

2 A. Yeah. And then he had a special called
3 meeting September the 8th at Palmetto Law Center.
4 And so he said when he got the letter from Attorney
5 Beale how angry he was. He said that he had -- he
6 said so much that -- that night until he asked the
7 members. He told them that he had something in
8 place, and that he was going to put me out of the
9 church if I did not repent or apologize to him.

10 And I said -- I said, excuse me, I'm not
11 going to sit here and let him just continue beating
12 up on me. So I asked could I stand and defend
13 myself. So he gave me that right. And I said,
14 "Pastor Capers, why are you pulling the church into
15 this when this is between me and you?" And he said,
16 "This is a church matter." I said, "Yes, it is." I
17 said, "But you are not God."

18 And he wanted me to repent and apologize
19 in front of the church to him. I told him, "You
20 want me to apologize and repent to you?" I said,
21 "No, you are not God." So he said if I didn't, he
22 had something in place. And I don't know the letter
23 that he was waving in his hand was that the letter
24 or not. I cannot say, but he did explain to -- and
25 I'm missing a lot of stuff.

1 I'm just trying to visualize it in my mind
2 as I go while I'm talking. And so the members
3 voiced their opinion. They said, "No. No. You
4 can't do that." And he said I was out of order. I
5 was disrespectful. So one of the members said,
6 "When did you say she was out of order? When was
7 she disrespectful?"

8 And he never answered the questions that
9 was presented. And so that -- some other things
10 went on that I asked questions about. And he told
11 me that I could have brought my husband and I could
12 have -- I wasn't going to meet with him alone. He
13 said he could have had his wife there. I said, "No.
14 Your wife don't like me." She attempted to throw
15 water on me. So she threw a bottle at me, and I
16 threw the bottle back. So --

17 **Q. You felt this was not the appropriate way**
18 **to go about church discipline?**

19 A. No.

20 **Q. Is that correct?**

21 A. No. Whether you know it or not, I've
22 taken a lot. And so the next day when the
23 members -- afterwards we talked. And they said
24 "Well, it's over with now. We done voiced our
25 opinion. You are going to be in -- you are going to

1 stay in the church." I said, "No, you all, it's not
2 over." And they said, "How do you know?" And I
3 said, "Because I know."

4 Because Minister Wilson said, "Well, maybe
5 we can talk about this at another -- at a later
6 date." And he said, "It won't happen." And then
7 the meeting was adjourned.

8 **Q. All right.**

9 A. And so the members were thinking that it
10 was over because they voted down, and I told them,
11 no. No. It was not.

12 **Q. And then you received the letter?**

13 A. Then I received the letter. I knew --
14 when I saw that letter I knew what it was. I didn't
15 know what was in it as far I knew it had to be
16 something about the special called meeting. Put it
17 like this, I knew when I saw it my instinct was that
18 is for me. Without even me opening the letter I
19 knew. I said, "Well, I got my letter. I knew I was
20 going to get this."

21 **Q. Then you got it and read it. And what did**
22 **you do next after you had read it and digested it**
23 **and had the period where you were disciplined?**

24 A. I called Attorney Beale.

25 **Q. Okay. Did you call anyone else to talk**

1 **about the letter?**

2 A. After I spoke with Attorney Beale, yes.

3 **Q. Who did you call and talk with?**

4 A. I only spoke with -- I think I talked with
5 Rosa. I said, "Rosa, you all's vote didn't count."
6 I told Carey Bell, "You all's vote didn't count."
7 And I told Ms. Jowers. I said, "You told me it was
8 over," but it was not over. But I didn't tell them
9 what was in the letter. I told them that I received
10 the letter. I didn't read -- I didn't read the
11 contents to them.

12 **Q. Who all have you shown the letter to?**

13 A. This is -- nobody. Now, after it's --
14 quite a few people have seen it now.

15 **Q. Okay. You've shown it to several people?**

16 A. The people that -- yeah. They didn't
17 believe it. Most people that once they heard about
18 it, they did not believe that -- I said, "Well, I'm
19 not lying." I said, "It has happened." And one of
20 the deacons had said that the pastor told them that
21 he was going to pray on it.

22 **Q. What deacon was that?**

23 A. Robert Davis. Before he sent it out.

24 **Q. Did Robert Davis sign the letter?**

25 A. Yes, he did. I'm going to say I don't

1 know whether his mother-in-law had passed, but we
2 were sitting under the tent. I don't know if this
3 was before I got the letter. No, this is before I
4 got the letter. And he was talking with me; Robert
5 Davis. And he said, "You have saved this church
6 twice."

7 **Q. Did you write any letter back to anybody**
8 **about the actions?**

9 A. No. Uh-huh. No.

10 **Q. Did you call any of these people and say,**
11 **"What is this?"**

12 A. No. No. I have no contact with them.

13 **Q. Okay.**

14 A. No. The only person that I -- that did
15 make contact with me was Rivers. And he was at the
16 motion to dismiss hearing.

17 **Q. Who is that?**

18 A. Edwin Rivers.

19 **Q. Edwin Rivers?**

20 A. Yes, uh-huh.

21 **Q. Okay. What did Edwin Rivers say?**

22 A. That he was on my side.

23 **Q. Okay. And what did he say about the**
24 **letter?**

25 A. Well, he didn't. He didn't -- he didn't

1 talk. He just told me he was on my side. And he
2 asked me was I all right. I told him I was fine.

3 **Q. Does he know you've sued him?**

4 A. Yes, he knew.

5 **Q. So he's on your side against himself?**

6 A. I'm just telling you what he said. That
7 is the answer he gave me.

8 **Q. Okay.**

9 A. Now, I don't think that Robert Davis -- we
10 were talking about -- we weren't talking about this
11 letter right here when he was talking to me in
12 general. He was just -- yeah, he was talking about
13 just my ways as far as how I had stood up for the
14 church and how I had saved the church twice. He was
15 speaking on my behalf.

16 **Q. Do you remember the first time that you**
17 **showed this letter to someone else other than**
18 **Attorney Beale to show them what it really said?**

19 A. I don't recall who I showed it to first.

20 **Q. Do you remember, was it within a week?**
21 **Within a day?**

22 A. I don't know. I don't know. Because once
23 I got the attorney and stuff I didn't feel it was a
24 secret then.

25 **Q. Okay. So you started showing it to people**

1 **at that point?**

2 A. No, I didn't show it to a lot of people,
3 but I just -- people that asked me about was it true
4 that I was excommunicated, and they didn't believe
5 it.

6 Q. **And that is when you showed them?**

7 A. Yes, uh-huh.

8 Q. **And you figured by that point you had gone**
9 **and gotten an attorney. There is no secret?**

10 A. I got an attorney before then, uh-huh.

11 Q. **Okay.**

12 A. It's just --

13 Q. **Have you written up any sort of statement**
14 **or list of what has happened to help you remember**
15 **these events?**

16 A. Pertaining to this?

17 Q. **Yes.**

18 A. I have written statements of pertaining to
19 what has happened within the church, the members are
20 not -- that happened within the church, and they
21 were not excommunicated.

22 Q. **Okay. What about things that have gone on**
23 **in the church since the lawsuit has been filed?**

24 A. Have I written a list of things that have
25 happened? Well, I haven't been to the church so I

1 can't tell what is going on. So, no.

2 **Q. Have you talked to anyone about your**
3 **deposition today?**

4 A. They know that I had -- people called and
5 prayed for me. As far as what is the details about
6 it, no, because I can't tell them what is going on.
7 I just -- people prayed for me.

8 **Q. Did you ever talk to anyone about the**
9 **deposition of Travien Capers yesterday?**

10 A. No more than it was just it's over, that
11 our deposition is over. And I had a concern with
12 someone was parked over there in the Citizen's --
13 First Citizen's parking lot. And I thought that
14 that person was sitting there for a long period of
15 time watching Mr. Beale's office.

16 **Q. Who was that?**

17 A. I don't know. I was just -- I guess maybe
18 my paranoia. I just saw a van that pulled up there.

19 **Q. Prior to the deposition yesterday who had**
20 **you talked with about Travien Capers' deposition**
21 **coming up?**

22 A. I don't know.

23 **Q. Who told you that Travien had said he**
24 **wasn't going to come to a deposition?**

25 A. He said it.

1 Q. When?

2 A. He said it in the church meeting. Not
3 about this deposition. He said he was not going to
4 answer no lawyer.

5 Q. You heard him say that?

6 A. Yes.

7 Q. You are talking -- okay. So you are
8 talking about back before all of this or while all
9 of this was happening, while you were still at the
10 church?

11 A. Right.

12 Q. Okay. Did you ever hear anything about
13 Travien saying he wasn't going to show up for his
14 deposition yesterday?

15 A. What I'd been hearing is just hearsay.

16 Q. Who did you hear it from?

17 A. Not about -- he wasn't going to no court.
18 Not about no deposition.

19 Q. Who did you hear that from?

20 A. Mostly church members.

21 Q. Who?

22 A. Let me see. Who did say that? As far as
23 his deposition, no.

24 Q. Who said he wasn't going to go to court?

25 A. He said that he wasn't, but he was talking

1 --

2 **Q. Who told you that?**

3 A. He said it from the pulpit.

4 **Q. Who told you that he said that?**

5 A. No, I'm misunderstanding what you are
6 asking me.

7 **Q. Who told you that Travien Capers said**
8 **that? You said church members informed you. I want**
9 **to know the names of church members that have**
10 **informed you of that.**

11 A. That he was not coming to court?

12 **Q. Right.**

13 A. I don't think that -- what they were
14 telling me I think was just pure speculation.

15 **Q. And I want their names.**

16 A. You want their names?

17 **Q. Yes.**

18 A. Nadine Taylor.

19 **Q. Anyone else?**

20 A. That is basically who I would speak with.

21 **Q. Who told you that Travien Capers had told**
22 **people the lawsuit was over?**

23 A. No one in particular told just like --
24 what they were telling me is really hearsay. So it
25 was -- well, Nadine Taylor for one. She was one of

1 the ones that was saying that he would say in the
2 pulpit; but, see, I didn't know I could bring
3 hearsay here.

4 Q. You talked with Nadine Taylor a good bit
5 about your case?

6 A. That is my cousin, uh-huh. We talk a lot.

7 Q. What all else have you talked with her --
8 Nadine Taylor about this case?

9 A. We just speculate about where it's going
10 and what we think the outcome of it will be because
11 we don't know. Trying -- hoping that everything
12 will resolve itself and that we -- that I will be
13 reinstated into the church.

14 Q. Is that your goal with this lawsuit is
15 just to be reinstated?

16 A. Somewhat.

17 Q. What else is your goal with the lawsuit?

18 A. I want to see those 16 people pay for what
19 they did to me. They really --

20 Q. You want them to lose their position?

21 A. They could. If it was a vote and my vote
22 matters. If it was one vote, and that one vote
23 matters, I would be the person to vote.

24 Q. So your goal is to be reinstated and for
25 these 16 people to lose their position?

1 A. To be voted on. At least to be voted on.

2 **Q. And that is what you are looking for with**
3 **the lawsuit?**

4 A. Somewhat.

5 MR. BEALE: And I would object in
6 part to the question because I think the lawsuit
7 speaks for itself. She's asked for certain relief
8 in it. And I think that is self-explanatory, but
9 that said, you go ahead and answer the questions.
10 BY MR. FARR:

11 **Q. Have you ever written anything to anyone**
12 **other than your attorney about the lawsuit or about**
13 **the behavior of these individuals?**

14 A.. No.

15 MR. FARR: I am going to take a short
16 break and look over a few things.

17 (Recess 12:57 to 1:04 p.m.)

18 MR. FARR: Back on the record.

19 BY MR. FARR:

20 **Q. We've been here a little while. As far as**
21 **your testimony has gone so far, have you understood**
22 **all of my questions or at least gotten clarification**
23 **when you did not understand?**

24 A. Yes.

25 **Q. Has everything you told me been the truth**

1 to the best of your knowledge and recollection?

2 A. Yes.

3 Q. Is there any portion of your testimony
4 that you wish to further explain or change in any
5 way?

6 A. I didn't -- yes. I didn't talk about --
7 when we talked about my P.T.S.D.

8 Q. Okay.

9 A. And my blood pressure has been elevated
10 since this has happened. My normal blood pressure
11 is 100 over 68.

12 Q. Have you had to treat with a -- start
13 treating with a physician?

14 A. Well, I have a physician at the V.A.
15 anyway.

16 Q. Okay.

17 A. But --

18 Q. Have you had a change in diagnosis dealing
19 with your blood pressure since all this?

20 A. No. The only thing that -- I know what is
21 causing it, that I have -- since I have pulmonary --
22 not pulmonary, but sarcoidosis Stage 4, I have to
23 take it for my pressure of the heart.

24 Q. You take blood pressure medication for
25 that?

1 A. Yes.

2 Q. And has your dosage changed at all?

3 A. They are working on that now because they
4 can't get the pressure down under 120.

5 Q. And has any doctor ever attributed that
6 blood pressure control to what is going on with the
7 letter?

8 A. A doctor agreed with me, my doctor, but I
9 don't know if he recorded that or not.

10 Q. When did it start going up?

11 A. Shortly after I got this letter. It was
12 normally -- my blood pressure is, like I say, it's
13 normally 100. At the most it might get 120, but
14 it's like 146.

15 Q. When do you first recall that being over
16 120?

17 A. Shortly after I got my September letter.

18 Q. So you will have a doctor visit in
19 September that shows your blood pressure higher?

20 A. It might. It might not. Because I didn't
21 really -- well, when I talked to my doctor -- my
22 doctor is Dr. Peter. That is my primary care
23 doctor. And I share with him a lot of things. And
24 I don't know if he puts it in the record or not.
25 It's me, patient to doctor.

1 Q. And then you filed the lawsuit a couple
2 months after receiving this letter, correct?

3 A. After I got the letter I immediately took
4 it to Attorney Beale.

5 Q. Anything else you need to further explain
6 or change about your testimony?

7 A. Not that I'm aware of. One thing I would
8 like to clarify.

9 Q. All right.

10 A. Is that in the church meetings you have to
11 stand and recognize -- identify yourself.

12 Q. Okay.

13 A. And then you are given a mic. And each
14 and every time that I have stood to my feet I was
15 given a mic to speak.

16 Q. Okay.

17 A. So I want that to be clear. That is why
18 I'm trying to figure out where did I become so
19 disruptive. And some of these same defendants here
20 were with me in the prior lawsuit, and they were
21 with me until Pastor Capers came along. They
22 were -- they were with me.

23 The only people that I can tell you that
24 was not in my corner was Trustee Larry Brown who is
25 the treasurer. And at the time Harry Jones, but we

1 had mend our fences.

2 Q. All right.

3 A. So I didn't really have any problems with
4 any of them. They really supported me. This is why
5 I think I'm more hurt and disappointed by their
6 actions because, he likes my cakes. And he would
7 come, and I would bake cakes for him. I call him
8 over and say, "Come on. I got some cake," but I had
9 no idea he felt like this. Hidden issues. I think
10 this is what is hurting. This is what is so hurting
11 and disappointing.

12 Q. All right. Well, I don't have any further
13 questions if you don't have any further changes?

14 A. No.

15 Q. Thanks so much.

16 A. Okay.

17 THE WITNESS: This is over?

18 MR. BEALE: No. I've got a couple
19 questions.

20 EXAMINATION

21 BY MR. BEALE:

22 Q. Ms. Goodson-Eaddy, were you an active
23 member of Zion Benevolent Baptist Church --

24 A. Yes.

25 Q. -- from the 1960s until you were

1 excommunicated by these defendants by that letter of
2 August 30, 2014?

3 A. Yes.

4 Q. Had you been an active member in that
5 church?

6 A. Yes.

7 Q. Was Mr. Capers and the deacons and
8 trustees, were they actually elected by the church
9 body in 2010 when Capers first came?

10 A. Yes. Only the pastor was, but not the
11 trustees and the deacons.

12 Q. All right. And did you attend the
13 majority of the meetings -- the church meetings that
14 were held after that?

15 A. After Pastor Capers came?

16 Q. Yes.

17 A. Yes. Up until 2013.

18 Q. Yeah. And was there ever any elections in
19 2011, 2012, and 2013, that were done in accordance
20 with the church's constitution and by-laws?

21 A. Only one that I know of.

22 Q. Pardon?

23 A. Only one that I know of, and that was one
24 when they voted for Pastor Capers.

25 Q. And that was in what year?

1 A. When he first came.

2 Q. To the best of your knowledge did the
3 church members ever have an opportunity to exercise
4 their right to vote on the pastor and the deacons
5 and trustees after that date?

6 A. No, sir.

7 Q. Now, in this specially called meeting
8 September 8, 2014, at that time you had not received
9 the letter of August 30th; is that correct?

10 A. That's correct.

11 Q. And you didn't know anything about the
12 fact that the -- Capers and the rest of these
13 defendants had actually signed off on a letter
14 August 30th, did you?

15 A. No, I did not.

16 Q. So the August 8, 2014, were you aware of
17 any issues about you being on the agenda to be
18 excommunicated?

19 A. Was it -- excuse me? Attorney Beale, was
20 it September the 8th?

21 Q. Yes. The meeting that --

22 A. Okay. September the 8th?

23 Q. Yes.

24 A. No. Because they had on the agenda
25 Palmetto Law Center.

1 Q. Right. And to the best of your knowledge
2 nothing had ever been mentioned prior to that
3 meeting about the fact that they were going to take
4 up whether or not you should be excommunicated from
5 the church?

6 A. That was done September the 8th.

7 Q. Right. But I'm saying did either Capers
8 or any of the trustees or deacons make the
9 membership aware that this issue was going to be
10 decided on September the 8th?

11 A. Yes.

12 Q. Huh?

13 A. Yes, he did.

14 Q. How did he do that?

15 A. He had a letter in his hand, but he didn't
16 state. He said that they had something already in
17 place to put me out of the church, but I had to
18 repent and apologize to him. If I didn't, then they
19 were going to go through with what they had planned
20 to put me out.

21 Q. Okay. Let me -- let me restate the
22 question.

23 A. Okay.

24 Q. The question was prior to that meeting had
25 Capers or any of the trustees or deacons made the

1 church members, including you, aware of the fact
2 that --

3 A. No.

4 Q. -- there would be a discussion about
5 whether or not you were to be excommunicated?

6 A. No.

7 Q. Now, at that meeting on September the 8th
8 how many members of the church were present at that
9 meeting, roughly, as best you recall?

10 A. I would say less than a hundred.

11 Q. Okay. And how many members are there in
12 the church that you know of?

13 A. I think it's a -- the membership is about
14 300.

15 Q. Okay. And did he attempt -- did Capers
16 attempt to bring before the people that were present
17 the fact that he wanted to excommunicate you?

18 A. Yes.

19 Q. And what was the response from the
20 membership that was there?

21 A. They said, "No, you can't do that." And
22 one spoke up, another one, and said I was out of
23 order. And he said, "Well, when did you call her
24 out of order?"

25 Q. And did any of the trustees or deacons

1 that were present ask that the matter be not
2 discussed further?

3 A. Mr. Wilson asked Pastor Capers to -- let's
4 talk about this matter later. He said, "No, it
5 won't happen."

6 Q. Well, I'm sorry. Who said it won't
7 happen?

8 A. Pastor Capers said it.

9 Q. I see. And was there ever any type of
10 actual vote taken by the members that were present
11 at that September the 8th meeting?

12 A. The only thing when he said that he was
13 going to put me out they yelled out, "No, you can't
14 do that," but no vote as far as written ballots.

15 Q. Well, any vote at all about -- in other
16 words, was the question posed to those members,
17 should we excommunicate Carol Goodson-Eaddy?

18 A. Yes.

19 Q. Was that issue put to the members for a
20 vote?

21 A. Pastor Capers -- I don't know if you call
22 that putting it to a vote, but he -- he was talking.
23 And he said that he was going to put me out of the
24 church -- Sister Eaddy out of the church. And the
25 members screamed out, "No, you can't do that."

1 Q. Did he say why to the members of the
2 church, why he wanted to have you excommunicated?

3 A. Well, one thing he said that he was
4 extremely angry, like a mad man, that he received a
5 letter from your office, Attorney Beale's office.

6 Q. Well, I understand that, but did he say
7 any reasons other than getting some letter why you
8 should be put out of the church you had been a life
9 long member of?

10 A. Pastor Capers said so much, Attorney
11 Beale, I don't remember.

12 Q. Well, stop and think. Take your time.

13 A. Okay. Okay. He said that he asked to
14 meet with me. And I refused without an attorney.

15 Q. Did he say anything about you being a
16 troublemaker?

17 A. Yes, he did. He did say that.

18 Q. And was that a false statement by him?

19 A. Yes, it is.

20 Q. And he made that statement to the hundred
21 or so members that were present?

22 A. Yes, he did.

23 Q. Now let me ask you this. After that
24 meeting ended there had not been any vote by the
25 church members to excommunicate you; is that

1 correct?

2 A. That's correct.

3 Q. But you were unaware that the -- Capers
4 and several of the trustees and deacons had already
5 signed off on a letter that was a week or so before
6 that?

7 A. That's correct.

8 Q. The August 30th letter?

9 A. That's correct.

10 Q. In that letter they clearly were
11 excommunicating you, were they not?

12 A. Yes.

13 Q. Now, let me ask you this. After you
14 received that letter -- you being a life long member
15 of the church, has anybody come up to you and asked
16 you why you are not coming to the church anymore?

17 A. Yes.

18 Q. Okay. And what, if anything, did those
19 people ask you?

20 A. Well, first of all, some of the things
21 that they said was like they couldn't believe that
22 they had done what they did. Who gave them the
23 authority to put me out of the church? Who gave the
24 pastor of all people authority to put me out of the
25 church when he's not even a member of the church.

1 Q. Right. And if you can, tell us if you can
2 recall who some of these people were that came up to
3 you after you were excommunicated and asked you
4 about what the pastor had done?

5 A. One of them was Nadine Taylor.

6 Q. I understand.

7 A. Okay.

8 Q. But how about anybody else? Can you
9 remember anybody else?

10 A. My cousin.

11 Q. And who was the cousin that asked you
12 that?

13 A. Joyce Sims.

14 Q. Joyce?

15 A. Sims. Uh-huh.

16 Q. Sims?

17 A. Yes.

18 Q. S-i-m-s?

19 A. Yes. S-i-m-s.

20 Q. And where does Joyce live?

21 A. She lives on Bluff Road.

22 Q. And is she a member of that church, Zion?

23 A. She used to be.

24 Q. Used to be?

25 A. Yes.

1 Q. But she now is no longer a member of the
2 church?

3 A. That's correct. She followed her husband
4 which they are burying him today.

5 Q. All right. Now, in reference to that
6 question about whether or not -- who all came up and
7 asked you or surprised or shocked by the fact that
8 you had been put out of the church, I would ask you
9 to think about that question. And if you come up
10 with any other information to be sure to let me know
11 so I can let -- you remember somebody else?

12 A. Yes. As a matter of fact, my cousin Wanda
13 Scott.

14 Q. Wanda Scott?

15 A. Yes.

16 Q. Okay.

17 A. She had asked me -- she had heard that I
18 was suing the church. She didn't even -- she
19 doesn't attend. She's back to Zion Benevolent, but
20 she left Zion Benevolent and she followed Pastor
21 Tucker.

22 And she said people were coming up to her
23 asking her what happened with me, why was I put out
24 of the church. She said she couldn't answer. Why
25 was I suing the church. She said she couldn't

1 answer because she couldn't believe that -- why
2 would I sue the church.

3 Q. Right.

4 A. And so I told them I'm not suing the
5 church.

6 Q. You've never sued the church in this
7 lawsuit, have you?

8 A. Never. Never.

9 Q. The only people you've sued was Capers and
10 the trustees and deacons that signed off on the
11 letter?

12 A. That's correct..

13 Q. Okay. So Wanda Scott?

14 A. Yes.

15 Q. Anybody -- if you do think of anybody else
16 be sure to let me know. And I can let counsel know.

17 MR. BEALE: And then we can keep the
18 deposition open and you can ask her any questions
19 you want to.

20 MR. FARR: Okay.

21 MR. BEALE: About if she's able to
22 think of anybody else, but --

23 THE WITNESS: Attorney Beale, when
24 you asked me the question just now and I answered
25 never, were you saying did I ever sue Zion

1 Benevolent before?

2 BY MR. BEALE:

3 Q. No, I didn't ask you that.

4 A. Okay. I want to be clear on that.

5 Q. I said in this lawsuit did you ever sue
6 Zion Benevolent Baptist Church in this lawsuit?

7 A. No.

8 Q. No?

9 A. No.

10 Q. And I wanted to ask you, counsel was
11 talking to you about that meeting that you attended
12 sometime prior to July the 22nd when you got that
13 e-mail from Capers, you had been in attendance at a
14 meeting, correct? Some -- some church meeting?

15 A. That's correct.

16 Q. Did a question come up about some \$147,000
17 being missing from the budget that was presented?

18 A. Yes. I was reading the budget that was
19 passed out, and I asked the question -- stood to my
20 feet. And I -- of course, I said, everybody, you
21 know who I am. And I asked the question what
22 happened to \$147,000.

23 Q. Yeah. And this budget was the one that
24 had been attached to the agenda?

25 A. That's correct.

1 Q. And it had been prepared by the officers
2 of the church; is that correct?

3 A. Yes.

4 Q. So when you asked this question what
5 answer did you get?

6 A. It was in another account.

7 Q. I don't understand. What -- how did they
8 -- what did they say about where did the \$147,000
9 go?

10 A. Well, they had two accounts. They had a
11 building fund account and a construction account.

12 Q. Right.

13 A. And they said that the money went into a
14 construction account.

15 Q. But is that what the budget showed that
16 was attached to the agenda?

17 A. No. No. No, sir, it did not.

18 Q. It just showed there was \$147,000 missing?

19 A. Yes.

20 Q. And that was the question that you had?

21 A. That's correct.

22 Q. And who had gave you an answer to that
23 question?

24 A. Lever Thompson was on the floor answering
25 the questions because Trustee Brown was not there.

1 Q. Who is he?

2 A. He's -- he was somebody that was taking
3 Larry Brown's place because he was out of town.

4 Q. Okay. But what did Larry Brown do?

5 A. He's the treasurer.

6 Q. He's the treasurer. Okay. So somebody
7 else was standing in for him?

8 A. In place of him.

9 Q. All right.

10 A. But Deacon Gregory Brown was up, too,
11 addressing the issue about the money because he's
12 handling the money as well.

13 Q. Okay. And so what was his response to
14 your question about the \$147,000?

15 A. That is when he was rallying when that
16 happened.

17 Q. He was what?

18 A. Rallying.

19 Q. What does that mean?

20 A. He was all over the place talking.

21 Q. Oh, okay.

22 A. The County this and the County that. And
23 something about the County back and forth. And he
24 never answered the question directly. And so he
25 walked off. And I said to Pastor Capers, "You see

1 what kind of deacon you have?"

2 **Q. So did anybody give you any answer as to**
3 **what happened to the 47 -- \$147,000?**

4 A. No.

5 **Q. Did you think that was a sizable sum of**
6 **money?**

7 A. Yes, it is.

8 **Q. Did you think that was a legitimate**
9 **question for you as a member of that church to ask?**

10 A. Yes.

11 **Q. Do you think you deserved an answer?**

12 A. Yes.

13 **Q. Did you ever get an answer?**

14 A. Not that night.

15 **Q. Did you ever get an answer from anybody?**

16 A. No. You are talking about the night of
17 'that meeting?

18 **Q. No. I'm talking about after the**
19 **meeting -- you didn't get any answers at the**
20 **meeting, so what happened after the meeting?**

21 A. They had a meeting and they show cause.

22 **Q. They what?**

23 A. They show cause where the money was in the
24 construction account. And that was in the special
25 called meeting.

1 Q. When was that?

2 A. September the 8th.

3 Q. No. September the 8th you said the budget
4 that was attached there was missing \$147,000.

5 A. Okay. What they did when they had the
6 special called meeting they talked about the budget.
7 They talked about -- and they talked about Palmetto
8 Law Center. There was three things that was
9 addressed.

10 Q. I understand that, but you mean in the
11 September 8th meeting they corrected the mistakes
12 that were made in that budget?

13 A. Yes. And they said that it was in a
14 construction account. They had created a
15 construction account. I don't know if it was the
16 September 8th. There is so much that was going on.
17 I want to say -- I never did get a straight answer
18 that night.

19 Q. Well, I understand that. And that was the
20 July meeting that you had?

21 A. That's correct.

22 Q. And did Capers ever call you after that
23 meeting and try to give you an explanation about
24 what happened?

25 A. No. No. He did not.

1 Q. Did the treasurer ever call you and try to
2 give you any explanation?

3 A. No.

4 Q. And the next time you heard anything at
5 all about the budget was the September 8th meeting?

6 A. Yes.

7 Q. And that was the time they tried to
8 excommunicate you?

9 A. That's correct.

10 Q. Okay. Ms. Goodson-Eaddy, I wanted to ask
11 you a question about as far as the deacons and the
12 trustees were concerned, to the best of your
13 knowledge in 2011, '12, '13, was there ever any
14 elections held where the church body voted on those
15 positions as trustees and deacons?

16 A. No.

17 Q. To the best of your knowledge was there
18 ever any election other than the one in 2010?

19 A. No.

20 Q. And how was it that you -- the meetings
21 that you attended, how was it that they accomplished
22 the fact that they had to be elected each year?

23 A. Would you rephrase that?

24 Q. Yes. How did the trustees and the deacons
25 and even the pastor, how did they continue to

1 **operate the church if they weren't elected by the**
2 **people?**

3 A. Well, they were doing the annual church
4 meeting. Someone, which is most of the -- one of
5 the defendants would say, "I make a motion that we
6 retain the same officers." And one of the
7 defendants get up and second it. And for it, and
8 all of them in the little group would say yeah. And
9 that is it. It doesn't matter about the nays.

10 Q. And was there ever any notices sent out to
11 the membership prior to these annual meetings
12 saying, we are going to have a vote on the pastor,
13 the deacons, and the trustees?

14 A. No.

15 Q. And your understanding is that that is
16 what is required by the church's constitution and
17 by-laws?

18 A. Yes.

19 MR. BEALE: Okay. Okay. That is all
20 I've got. Answer any questions that counsel may
21 have for you.

22 THE WITNESS: Okay.

23 MR. FARR: Nothing further. We are
24 all through.

25 (Whereupon, the taking of the

1 deposition was concluded at 1:30 p.m.)
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1 Certificate of Reporter

2
3 I, Jeffrey M. Thomas, Registered
4 Professional Reporter and Notary Public in and for
5 the State of South Carolina, do hereby certify that
6 I reported the deposition of Carol Goodson-Eaddy on
7 the 3rd day of September, 2015; that the witness was
8 first duly sworn by me, and that the foregoing 137
9 pages constitute a true and correct transcription of
10 the said deposition.

11 I further certify that I am neither
12 attorney nor counsel for, nor related to or employed
13 by, any of the parties connected with this action,
14 nor am I financially interested in said cause.

15 I further certify that the original of
16 said transcript shall be hereafter sealed and
17 delivered to PETER E. FARR, ESQUIRE, Murphy &
18 Grantland, PA, 4406-B Forest Drive, Columbia, South
19 Carolina. This sealed original transcript shall be
20 retained by the above party, who shall be
21 responsible for filing same with Court prior to
22 trial or any hearing which might result in a final
23 order on any issue.

24 In witness whereof I set my hand and seal
25 this 17th day of September, 2015.

My Commission
expires 12/14/17

Jeffrey M. Thomas, RPR
and Notary Public for the
State of South Carolina

1 Verification of Deponent
2

3 I, Carol Goodson-Eaddy, have read the
4 foregoing deposition testimony, which was reported
5 by Jeffrey M. Thomas, RPR and Notary Public in and
6 for the State of South Carolina, on September 3,
7 2015.

8 I find the transcript of the deposition to
9 be a true and accurate transcript according to my
10 testimony on that date, with the exception of
11 _____ corrections as listed on the attached
12 errata page, which was filled in by me.

13
14
15 _____
16 Carol Goodson-Eaddy

17
18 _____, 20____.

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February 17, 2008

Dear Members of Zion Benevolent Baptist Church

We are a group of concerned members that care about the financial and legal business of our Church. No law suit has been filed against Zion Benevolent Baptist Church. All of us are members of this Church body just like you are.

Out of concern for our Church, we hired Palmetto Law Center, P.C. and Attorney Hammond A. Beale to look into the issues that concerned us because Rev. Tucker refused to meet with us and answer the questions we had about the legal status of our church and how it was being operated. Rev. Tucker refused to discuss these issues with us. Thus, we asked Attorney Beale to write Rev. Tucker and the Chairmen of the Deacons and Trustees the enclosed letter dated 12/20/07. As stated in the letter, if the requested information was not forthcoming, Attorney Beale was prepared to file a Summons and Complaint against Rev. Tucker and the Chairmen of the Deacons and Trustees.

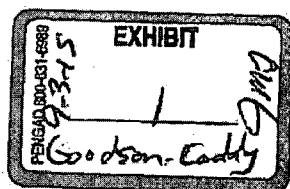
No lawsuit was ever filed because Rev. Tucker hired attorney Regina Lewis who in turn has furnished to us some of the requested information. However, there still remains serious unanswered questions as shown in Attorney Beale's letter dated 1/31/08. Attorney Lewis has told attorney Beale she was to meet with Rev. Tucker and other leaders of the Church and is supposed to call Attorney Beale and let him know whether the remaining information is to be furnished to him.

Again, we state as long as Rev. Tucker was willing to resolve the serious issues and furnish the information that had been requested, no lawsuit would be filed. The requested information was not furnished to Attorney Beale so we have now filed a lawsuit on 2/14/08.

If anyone has any questions, feel free to contact attorney Beale at 803-783-4570. He will be happy to answer any questions you may have.

Sincerely,

Concerned Members



January 5, 2010 Special Called Meeting 7:00pm

Purpose: To Discuss Internal Affairs of the Church.

7:00pm Devotion by Deacons

7:10pm Meeting opened by Deacon Frank Jones.

7:13pm Pastor Ladson addresses all those attending, suggesting we sing another song and have another prayer to allow more members to come in.

7:18pm Pastor Ladson requests that someone be willing to take notes of motions to give to late members for insight on that issue/motion.

7:22pm Letter read by Clerk, Anthony Brown, per request by Pastor Ladson. (See letter). Pastor Ladson discuss and explain the letter.

Nadine Taylor motion to have Pastor Ladson remain Interim Pastor with all duties and responsibilities as outline in the By-laws dated 2003. Seconded and approved.

Motioned by Felicia Robinson to move on past the present item that we are discussing, (duties and responsibilities of the Interim Pastor). Seconded and approved.

Motion by Ann Jones to go on with the vote for the Pastor on January 19, 2010 and bring in new Pastor on March 7, 2010 if elected. Also, continue with discussion of By-laws. Motion seconded. Vote 24 - Yes / 23--Opposed (No).

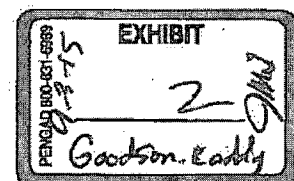
** Suggestion: By-Law Ministry, Deacons and Trustees meet on January 9, 2010 to set up dates and times for discussion of By-Laws and announce to Church Body. Also, any church member is welcome to attend.

** Suggestion: Asking other Ministries to help the Missionary with funerals / hardship needs.

* Motion read from Carol Goodson Eaddy. (See handout): She seeks the dismissal of Deacon Frank Jones as Chairman and as member of Deacons Ministry for reasons of his deceitfulness, rudeness, and poor attendance. Motion seconded. (Vote) Yes -5 / No - 23.

Motion to adjourn by Ronnie Clarkson.

10:40pm Adjournment.



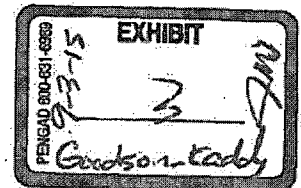
Zion
GENEVOLENT
BAPTIST CHURCH
est. 1870

201 Meeting House Road, Hopkins, SC 29061

(803)776-79

August 30, 2014

Mrs. Carol Goodson-Eaddy
1204 Clarkson Road
Hopkins, SC 29061



Dear Carol,

From the inception of the Christian church early in the first century, men and women of conviction have been the cornerstone of church administration. The writers of the New Testament have given instruction on how the church should function from the pulpit to the pew. At times, Biblical instruction is not always followed and respect for the sanctity of the House of God is forgotten. To this end, we write to you.

For years now, your presence and demonstrative actions have been the topic of adverse conversations around our church. Your deliberate disrespect for church administration and ignorance to scriptural protocol has wearied the heart of the faithful, and the church administration has decided to no longer stand idly by as if such behaviors are condoned. Again, the church is tired of the disruptions caused in meetings, the argumentative nature and disrespect shown to church officials and even more disturbingly, your habitual desire to turn church affairs into legal matters. We write to share with you what the Holy Bible records about such decisions and the conclusion to which we, the undersigned have arrived.

In the context of the perpetual disruptions, 1 Corinthians 14:33 records, "For God is not the author of confusion, but of peace, as in all churches of the saints." The church as a whole has been long displeased with even your presence in church meetings because they rarely end peaceably with you there. The ledger of such unbecoming behavior has gone on for too long. Again, such behaviors from you have been longstanding, but they now come to an end.

In examination of the disrespect for church administration, again, the demonstrations are habitual. You have seemed to assume an authoritative voice when in fact you are not an officer of this church. Such blatant disrespect for the scriptural authority of the Pastor, Deacons and officials of this church have gone uncorrected for too long. What the administration is charged to do is for your benefit, and not your detriment, but your disposition shows your indifference to this charge. Hebrews 13:17 reads, "Obey them that have rule over you, and submit yourselves; for they watch for your souls, as they must give account, that

Dr. Travien L. Capers
Senior Pastor

Gregory Brown
Chairman of
Deacon's Ministry

Anthony Brown
Clerk

April Griffin
Secretary

"Not willing that any should perish but that all should come to repentance." - 2nd Peter 3:9(c)



they may do it with joy, and not with grief: for that is unprofitable for you." Over the last few years you have made the spiritual responsibilities of the respective pastors, deacons and other officials more than difficult.

Finally, you seem to have an unusual obsession with turning church affairs into legal matters. 1 Corinthians 6:1-7 writes, "Dare any of you, having a matter against another, go to law before the unjust, and not before the saints? Do ye not know that the saints shall judge the world? and if the world shall be judged by you, are ye unworthy to judge the smallest matters? Know ye not that we shall judge angels? how much more things that pertain to this life? If then ye have judgements of things pertaining to this life, set them to judge who are least esteemed in the church. I speak to your shame. Is it so, that there is not a wise man among you? no, not one that shall be able to judge between the brethren? But brother goeth to law with brother, and that before the unbelievers. Now therefore there is utterly a fault among you, because you go to law one with another. Why do ye rather not take wrong? why do ye not rather suffer yourselves to be defrauded?" What is even more disturbing is that when the Pastor asked to speak with you regarding your concerns and disposition, you responded by saying that a conversation would only be had if an attorney was present. Such a response is nothing short of ungodly. Matthew 18:15-17, "Moreover if thy brother shall trespass against thee, go and tell him his fault between thee and him alone; if he shall hear thee, thou has gained thy brother. But if he will not hear thee, then take with thee one or two more, that in the mouth of two or three witnesses every word may be established. And if he shall neglect to hear them, tell it to the church; but if he neglect to hear the church, let him be unto thee as a heathen and a publican."

Finally, 1 Corinthians 5:13 records, "But them that are without God judgeth. Therefore put away from among yourselves that wicked person." Please know that the abbreviated aforementioned matters are more than substantive cause for us to exercise our decisive action of rescinding your membership of Zion Benevolent Baptist Church of Hopkins, South Carolina. Your name will be removed from the church record on the date this document is signed. We also hereby officially revoke all privileges of membership that are extended to partakers of this body. You are no longer welcome in any official church meetings or gatherings, and we encourage you to worship elsewhere so we may do so in peace. This letter has been sent by Certified Mail.

We will keep you in our prayers.

Travien L. Capers

Dr. Travien L. Capers, Pastor

Lawrence Thompson Jr.

Paul Davis

Robert Davis

Angus A. Brown

Herbert Bell

James Rantall

Harry Thompson

Dred A.W.L.

James Jones Jr.

Edwin S. Jones Jr.

David J. Clarke

Des. James Brown

Larry Brown

Margaret B. Adams

Subject: Last Night

From: revtcapers@bellsouth.net (revtcapers@bellsouth.net)

To: soso24@bellsouth.net;

Date: Tuesday, July 22, 2014 12:27 PM

Sister Carleen,

I pray your day is going well and God's mercies have been renewed for you. I wanted to know your availability for a good day and time we could sit and speak concerning a few matters. The meeting last night was disappointing and I had more than a few "concerned members" to speak with me between last night and this morning concerning the exchanges.

I'd like to speak with you, and possibly your husband (should you desire his presence there) regarding what seems a habitual cycle of what are being seen as disruptions in the church's formal meetings and the level of disrespect shown toward the officers of our church. Please let me be clear in saying I don't feel as if anything was directed toward me personally, but I stand with the officials of our church when we make presentations, so it's my obligation to see if matters need to be discussed further and quickly assuage any perceived misconceptions.

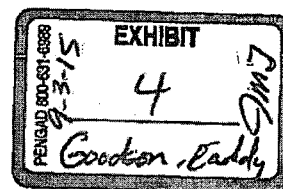
We want members that have questions to please raise them, but do so in a manner that respects our sanctuary and reflects a Christian character. In the discourse had on last night comments were made that challenged the personal integrity of one of our officers and such wasn't appreciated. The meeting as a whole on last night was forgettable, as some have been in the past and I am seeking to absolve any future meetings ending in similar fashion. Again, please let me know your availability for us to speak. Should you desire your husband to come, please know I have no issue with speaking before him, but these matters must be resolved quickly because there is unrest in the church regarding your disposition in these meetings.

As always, you know how to reach me should you have any questions, comments or concerns. Please send my warmest regards to your family.

Yours Because of Calvary,

Pastor Capers

Sent from my iPhone



1 STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
2 COUNTY OF RICHLAND) C/A NO.: 2014-CP-40-6224
3

4 Carol Goodson-Eaddy,)
5 Plaintiff,) DEPOSITION OF
6 vs.) NADINE TAYLOR
7 Travien L. Capers, Gregory A. Brown,) SEPTEMBER 16, 2015
8 Robert Davis, Herbert Bell, James)
9 Randolph, Jr., Harry Thompson, James)
10 Brown, Frank M. Jones, Edwin L.)
11 Rivers, Sr., Lever Thompson, Jr.,)
12 Fred Davis, Harry L. Jones, Sr.,)
13 David J. Clarkson, Larry B. Brown,)
14 Grady Wilson, and Dorothy B. Adams,)
15 Defendants.)
16

17 Deposition on oral examination of NADINE TAYLOR,
18 reported by Patricia G. Bachand, Court Reporter and Notary
19 Public in and for the State of South Carolina; pursuant to
20 Rule 30 of the South Carolina Rules of Civil Procedure;
21 said deposition was taken at the law offices of Murphy &
22 Grantland, PA, 4406-B Forest Drive, Columbia, South
23 Carolina, on Wednesday, the 16th day of September, 2015,
24 scheduled for ten o'clock a.m. and commencing at the hour
25 of 10:05 a.m.

APPEARANCES:

REPRESENTING THE PLAINTIFF:

HAMMOND A. BEALE, ESQ.

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REPRESENTING THE DEFENDANTS:

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21	Court Reporter's Legend:	
22	dashes [--]	Intentional or purposeful interruption
23	...	Indicates trailing off
24	[ph]	Denotes phonetically written
25	[sic]	Written as said

1 This deposition is taken in accordance with the
2 South Carolina Rules of Civil Procedure.

3 It is agreed and stipulated by the deponent and
4 respective counsel that the reading and signing of the
5 deposition by the deponent is expressly not waived.

6 WHEREUPON:

7 NADINE TAYLOR, being duly sworn and cautioned to
8 speak the truth, the whole truth and nothing but the truth,
9 testifies as follows:

10 EXAMINATION BY MR. BEALE:

11 Q. Ms. Taylor, my name is Peter Farr. We met a few
12 minutes ago. I represent a number of defendants in a
13 lawsuit brought by Mr. Carol Goodson-Eaddy. And you are
14 listed as a witness in that case; is that your
15 understanding as to why you're here today?

16 A. Yes, it is.

17 Q. Have you ever given a deposition like this
18 before?

19 A. No, I haven't.

20 Q. I'll go over a few rules for you to keep in mind.
21 And you've done a great job so far with the first couple of
22 questions, but there is a court reporter seated next to
23 you, she's recording everything that's said. So make sure
24 all your answers are out loud. The recording can't pick up
25 you nodding your head or pointing at me, or anything like

1 that. Make sure you use clear words like "yes" or "no,"
2 rather than "uh-huh" or "uh-uh," just so there's no
3 confusing what your answers are.

4 And please allow me to finish my question before
5 you answer. I will try to allow you to completely finish
6 your answers before I ask the next question, so that we
7 don't talk at the same time and jumble the recording.

8 If you do not understand any question asked to
9 you today, please have the attorney who asks it repeat
10 himself or rephrase that question so you understand exactly
11 what's being asked before you answer. And if you go ahead
12 and answer, we will assume you understood the question; is
13 that fair?

14 A. That's fair.

15 Q. If you need to take a break at any time, that's
16 fine. Just let us know and we'll take a few minutes, if you
17 want to stretch your legs, or whatever, and then we'll come
18 back.

19 The attorneys at times will object to one
20 another's questions. Mr. Beale may object to a question
21 that I ask; I may object to a question he asks. We're just
22 noting that for the record, you still go ahead and answer
23 the question even if someone objects.

24 If you have any questions at any time, please
25 direct those questions to the attorney who is asking you

1 questions at the time of your question. Sound good?

2 A. It's very good.

3 Q. All right. We'll go ahead and move forward,
4 then. What is your full name?

5 A. My full name is Nadine Sullivan Taylor.

6 Q. And what is your current address?

7 A. 3015 Eastway Drive, Columbia, South Carolina
8 29209.

9 Q. What is your date of birth?

10 A. [REDACTED]

11 Q. Who lives with you there on Eastway Drive?

12 A. No one.

13 Q. Are you married?

14 A. Divorced.

15 Q. Is your ex-husband still alive?

16 A. He's deceased.

17 Q. Do you have any children?

18 A. Yes, I do.

19 Q. Are any of them over the age of 18?

20 A. Yes.

21 Q. Do any of them live in Richland County?

22 A. Yes.

23 Q. And what are their names and ages?

24 A. Joseph Taylor, 45; Aaron Taylor, 36.

25 Q. And those are your only two children?

1 A. Yes, they are.

2 Q. Is Joseph married?

3 A. No.

4 Q. Does he have any children over the age of 18?

5 A. No.

6 Q. Has he ever been married?

7 A. Yes.

8 Q. Is his ex-wife still alive?

9 A. Yes.

10 Q. Is she in Richland County?

11 A. No.

12 Q. Is Aaron married?

13 A. No.

14 Q. Has he ever been married?

15 A. No.

16 Q. Does he have any children over the age of 18?

17 A. No.

18 Q. Do you have parents that are still alive?

19 A. No.

20 Q. Do you have any family in Richland County, other

21 than your two sons?

22 A. Yes.

23 Q. And who would those be?

24 A. My sons, my brother --

25 Q. What's your brother's name?

1 A. Kenneth L. Harper.

2 Q. I'm sorry, what was that last name?

3 A. Harper, H-a-r-p-e-r.

4 Q. All right. Is Kenneth married?

5 A. Yes.

6 Q. Who's he married to?

7 A. Sharon Scott.

8 Q. Does he have any children over the age of 18?

9 A. Yes.

10 Q. And do they live in Richland County?

11 A. No.

12 Q. All right. Other than your brother Kenneth, what

13 other relatives do you have? And your sons.

14 A. Do you want me to name all of them?

15 Q. Well, let's start with this: Do you have any

16 other siblings in Richland County?

17 A. No.

18 Q. Where are you from, originally?

19 A. Hopkins, South Carolina.

20 Q. And you've lived in Richland County all your

21 life?

22 A. Yes.

23 Q. Where did you go to school?

24 A. Booker T. Washington High School, Benedict

25 College. I took some course in Maryland, from the

1 University of Maryland, Towson State, and George Washington
2 University. And the University of South Carolina.

3 Q. Okay. At Benedict College, did you obtain a
4 degree?

5 A. Yes, I did.

6 Q. And what was the degree?

7 A. A bachelor of arts.

8 Q. And what year was that?

9 A. 1968.

10 Q. And with any of the other colleges that you went
11 to, did you obtain any further degree?

12 A. In Maryland, I received a -- an APC certificate,
13 which is the equivalence of a master's degree. At the
14 University of South Carolina, plus the state, I receive a
15 master's in education plus thirty.

16 Q. What do you currently do for work?

17 A. I'm retired?

18 Q. What are you retired from?

19 A. Teaching.

20 Q. Where did you teach last?

21 A. Richland School District One.

22 Q. And where did you teach?

23 A. Millcreek Elementary.

24 Q. And when did you retire?

25 A. I officially retired in 1999, from Lexington

1 School District One, and I taught ten years more in
2 Richland One.

3 Q. All elementary school --

4 A. Yes.

5 Q. -- the whole way?

6 A. Yes. Sorry.

7 Q. We've talked about some of your relatives --

8 (Ms. Goodson-Eaddy joins the proceedings.)

9 MS. GOODSON-EADDY: Good morning.

10 MR. FARR: Good morning. How are you?

11 (To the reporter) That's Ms. Carol Goodson-
12 Eaddy.

13 BY MR. FARR:

14 Q. We've talked about some of your relatives, your
15 children, your brother, and now let's move out into the
16 broader pool of your relatives, cousins. I want to focus
17 on ones that you see regularly. And by "regularly," I mean
18 more than once a year, you see them in a social setting.

19 A. Carol Goodson-Eaddy.

20 Q. And she is your cousin?

21 A. Yes.

22 Q. How exactly is she related to you?

23 A. She's a third cousin.

24 Q. Is that on your mother's side? Father's side?

25 How?

1 A. My mother's side.

2 Q. All right. And so you have a great-grandmother
3 that is also in Ms. Goodson-Eaddy's direct line? Or have
4 you sat down and actually figured it out?

5 A. No, I haven't sat down and figured it out.

6 Q. Fair enough. Other than Ms. Carol Goodson-Eaddy,
7 what other cousins do you have, that you see more than once
8 per year?

9 A. (The witness pauses.)

10 Q. To help you think through it, do you have a
11 family reunion?

12 A. We do.

13 Q. When you go --

14 A. Once in a while.

15 Q. When you go to that, how big it is?

16 A. Big.

17 Q. Okay. When you go there, how many people do you
18 normally see, that you see anytime other than that -- at
19 that family reunion?

20 A. There are quite a few. There are a lot of them
21 that I see.

22 Q. What are some common last names?

23 A. Adams, Goodson, Sumter, Clarkson. There are
24 others, that I don't remember just now. But given time, I
25 probably could recall them later.

1 **Q. Tell me when you first started going to Zion**
2 **Benevolent Baptist Church?**

3 A. I've gone there all my life, even before I was
4 born.

5 **Q. Do you still go there?**

6 A. Yes.

7 **Q. And do you have any official role at the church,**
8 **currently?**

9 A. Yes.

10 **Q. What is your role right now?**

11 A. I am over the Kingdom Lights, which is a small
12 children's singing group; chairperson of the Praise and
13 Worship Ministry; a member of the Lydia Circle; a member of
14 the musical choir; assist with singing with the Young
15 Adults Gospel Choir. And, presently, I think that's it.

16 **Q. In the last five years, have you held any other**
17 **positions at the church, other than what you just**
18 **mentioned?**

19 A. I worked on the constitution and bylaws, but it
20 wasn't -- I was the secretary there.

21 **Q. And when was that?**

22 A. You said five years going back? It ended --
23 excuse me -- back in 2010, I think. I'm guessing here. I
24 know I shouldn't. But when Pastor Capers became pastor.

25 **Q. Do you know why you are named as a witness in**

1 **this lawsuit?**

2 A. Yes.

3 **Q. Why is it?**

4 A. I was present at a church meeting when the --
5 when Carol was mentioned to be excommunicated from the
6 church.

7 **Q. So you were present at the meeting where it was**
8 **announced --**

9 A. Right.

10 **Q. -- to the membership?**

11 A. Yes.

12 **Q. This was a special-called meeting in August; is**
13 **that right? Or do you remember?**

14 A. My memory is September.

15 **Q. Okay. Any other area where you are a witness to**
16 **this case? Or is that just that meeting, that looks like**
17 **it was Monday, September 8th, 2014?**

18 A. Yes.

19 **Q. That's the only area in which you're a witness in**
20 **this case, to your understanding?**

21 A. That's the only area where he mentioned putting
22 her out of the church.

23 **Q. And when you say "he mentioned," are you talking**
24 **about Mr. Beale?**

25 A. I'm speaking of Pastor Capers.

1 Q. Okay. That's that only -- the only time you
2 heard him talking about this issue, was at that meeting?

3 A. Yes.

4 Q. There was -- there's been some talk in this case,
5 about a letter that was dated August 30. Have you seen any
6 such letter addressed to Ms. Goodson-Eaddy, that was dated
7 August 30, and signed by a number of people at the church?

8 A. Yes.

9 Q. Ms. Goodson-Eaddy showed you that letter?

10 A. Yes..

11 Q. And there was another -- an e-mail of July 22,
12 2014, about a meeting in July. Have you seen any such e-
13 mail?

14 A. Yes.

15 Q. And the e-mail addressed to Ms. Goodson-Eaddy,
16 from Travien Capers?

17 A. No, that was not the one.

18 Q. Okay. Other than -- other than those two pieces
19 of correspondence, only one of which you've seen, and the
20 meeting, is there anything else that you're aware of that
21 you witnessed, where Mr. Capers or any one of the
22 defendants was saying something about Ms. Goodson-Eaddy?

23 A. I don't remember.

24 Q. In the meeting of September 8, 2014, that was a
25 special-called church meeting; is that correct?

1 A. My memory says "yes."

2 Q. Which means that's a meeting separate from the
3 regular church service, where just the members would come
4 to the meeting?

5 A. Yes.

6 Q. And was that -- that meeting where it was
7 announced that Ms. Goodson-Eaddy was no longer going to be
8 a member of the church?

9 A. No.

10 Q. Tell me about the -- tell me what you know about
11 the meeting.

12 A. During that meeting, we had an agenda. And
13 towards the end, Pastor Capers held up an envelope -- a
14 yellow envelope in his right hand, and he started off,
15 began by saying, "I'm mad. I'm very mad."

16 And from there, he went on to tell us why he was
17 angry, he was mad. And then he started saying things about
18 a person in the church who was a troublemaker, and that
19 people had complained about her. And then he proceeded to
20 say she was a troublemaker. And then he called her name.
21 And eventually, Carol Eaddy raised her hand, asked could
22 she speak, that she was -- not going to sit there any
23 longer, since he had called her name, and let him say all
24 these things about her.

25 And from there they had a conversation, back and

1 forth with each other. And then, eventually, he mentioned
2 -- he said if she did not apologize and repent to him
3 before the church, he had something in place -- already had
4 something in place, he and the deacons, to have her removed
5 from the church. And the members of the church said, "No,
6 we're not having anyone put out of church."

7 So there was a little discussion there about
8 having a member put out of the church.

9 **Q. Other than Mr. Capers calling Ms. Goodson-Eaddy a**
10 **troublemaker, was there anything else he said directly**
11 **about her in that meeting, that you recall?**

12 A. He said a lot, but I can't recall exactly the
13 words that he used. He said so much.

14 **Q. Was it your understanding that his comments were**
15 **his method of church discipline for Ms. Goodson-Eaddy, for**
16 **whatever he perceived she had done?**

17 A. Would you rephrase that again?

18 **Q. Certainly. Mr. Capers was speaking at this**
19 **meeting, correct?**

20 A. Yes.

21 **Q. And he was speaking about Ms. Goodson-Eaddy,**
22 **correct?**

23 A. Yes.

24 **Q. And he was speaking to the members of the church,**
25 **correct?**

1 A. Yes.

2 Q. And his comments were about his church discipline
3 of Ms. Goodson-Eaddy? Is that correct?

4 A. He did not mention anything about church
5 discipline, per se, as written in our constitution and
6 bylaws.

7 Q. Was it your understanding that he was trying to
8 communicate church discipline that he was enforcing against
9 Ms. Goodson-Eaddy that day?

10 A. No, it was not my understanding in that church --

11 Q. What was your understanding of what he was trying
12 to communicate?

13 A. That if she didn't repent and apologize to him
14 before the church, he already had something in place to
15 have her removed as a member of the church. That was my
16 understanding.

17 Q. And you don't understand that to be his method of
18 discipline for her, as what he had in place?

19 A. I thought it was a warning at the time, when he
20 said it.

21 Q. What do you think he meant by he had something in
22 place? What did you think he had in place?

23 A. I didn't know at the time.

24 Q. And you found out later what it was?

25 A. Yes.

1 **Q. And what was it?**

2 **A. The letter sent to her, removing her as a member**
3 **of Zion Benevolent Church and telling her that she was no**
4 **longer welcome on the church grounds, in any form or**
5 **fashion, for any functions whatsoever.**

6 **Q. So at that meeting, he mentioned her behavior,**
7 **and he mentioned action that would be taken. And that**
8 **action turned out to be terminating her membership, and**
9 **prohibiting her from coming to the church; is that**
10 **accurate?**

11 **A. He mentioned termination her behave -- her**
12 **membership -- or having something in place to -- for her,**
13 **if she didn't -- he need an apology and repentance from**
14 **her. And it mentioned being a troublemaker.**

15 **Q. So he mentioned her actions that he called being**
16 **a troublemaker; he mentioned what he said she needed to go;**
17 **he mentioned some action he may take; and that action**
18 **turned out to be terminating her membership and preventing**
19 **her from coming to the church?**

20 **A. If I remember correctly, that's...**

21 **Q. Anything else you remember being discussed in**
22 **that meeting, other than those items?**

23 **A. Yes. He and I had an exchange about using a law**
24 **-- a lawyer. And he said, "We cannot go to lawyers to**
25 **handle church matters."**

1 And prior to that, he just said that in extending
2 one family's plot with the cemetery, that they had used a
3 lawyer to that. So I called him on that. I said, "You
4 just mentioned to us, about using a lawyer. And you just
5 used one yourself to handle that."

6 And he proceeded to tell me how that was dealing
7 with the church, and the other was not.

8 **Q. And that was a private exchange you two --**

9 A. No.

10 **Q. -- had afterward?**

11 A. That was during church meeting. And I said
12 either -- "In either case, a lawyer is being used."

13 **Q. Anything else you remember being a topic of**
14 **discussion?**

15 A. There was some unfinished business that was
16 handled prior, but I was focusing in on that exchange that
17 happened there at that time.

18 **Q. The exchange about use of a lawyer? Or the**
19 **exchange with Ms. Goodson-Eaddy?**

20 A. The exchange with Ms. Goodson-Eaddy and...

21 **Q. Anything more you remember said about Ms.**
22 **Goodson-Eaddy at that meeting, other than what we've**
23 **discussed?**

24 A. Right now, I don't remember.

25 **Q. Did anything about the discussion of Ms. Goodson-**

1 Eaddy, change your opinion of Ms. Goodson-Eaddy in any way?

2 A. No.

3 Q. The letter that Ms. Goodson-Eaddy showed you,
4 that was dated August 30, did anything in that letter
5 change your opinion of Ms. Goodson-Eaddy in any way?

6 A. Not for me.

7 Q. Ms. Goodson-Eaddy gave a deposition already in
8 this matter, and mentioned two other cousins of her, that
9 are Wanda Scott and Joyce Sims. And she mentioned that you
10 were her cousin. Is Wanda Scott and Joyce Sims relatives
11 of yours as well? Or is that a different side of Ms.
12 Goodson-Eaddy's family?

13 A. I know that Wanda Scott is, but I'm not sure
14 about Joyce.

15 Q. Is there anyone to whom you have spoken about
16 this lawsuit, or what's going on in the case, or the
17 allegations in the lawsuit?

18 A. Yes.

19 Q. Who else have you spoken with?

20 A. Some other cousins. Do I need to name them?

21 Q. Sure.

22 A. Vanessa Wimbush, Sandra Johnson, Sharon Scott,
23 Kevin Belton, Superior Edwards. Another minister --

24 Q. And who is that?

25 A. Stanley Ladson. Reverend Stanley Ladson. My

1 brother, Kenneth Harper. Jacqueline Brown, Carol's sister.

2 Q. Any others?

3 A. There are others I've spoke to about it, but I
4 don't recall all their names.

5 Q. Have you spoke with Ms. Goodson-Eaddy about the
6 lawsuit?

7 A. Yes, I have.

8 Q. Tell me about those conversations. What have
9 they involved?

10 A. I told her I was very hurt that it had happened;
11 I didn't agree with it, and that I didn't know the reason
12 she was really excommunicated from the church, name taken
13 off the church roll. And just -- very hurtful to have that
14 happen.

15 Q. What have you discussed with Ms. Goodson-Eaddy
16 about this lawsuit?

17 A. I told her that I would be a witness for her, if
18 she needed help, that I'm hoping that she could -- that it
19 could be resolved, that she could become a member of the
20 church again. 'Cause she's done so much work for Zion
21 Benevolent. And that she's changed since -- she's sort of
22 withdrawn now, instead of being the lively person she was.

23 Q. And what has she told you about the lawsuit?

24 A. As far for the past year, in order to avoid other
25 people asking me about it, I didn't ask any questions, and

1 she didn't volunteer specific information. We just talked
2 personally about it -- or my feelings about it.

3 Q. Have you spoken with her attorney at all?

4 A. Yes.

5 Q. And what have you spoken with him about?

6 A. This lawsuit.

7 Q. And what about? What things have you discussed?

8 A. The letter that was sent to her. And, basically,
9 that was it. The letter that was sent to her, and my
10 behavior in this deposition as well.

11 Q. Your behavior at this deposition?

12 A. Yeah. To tell the truth.

13 Q. And you met with him to prepare for this
14 deposition?

15 A. Yes.

16 Q. And what did you talk about as far as the letter?

17 A. The contents that were in it. That's it. I'm
18 sorry.

19 Q. And what was communicated to you about what to do
20 about the letter?

21 A. I was not told what to do about the letter, but
22 except to tell the truth.

23 Q. What specifically in the letter were you looking
24 at?

25 A. When Attorney Beale and I met, we did not -- I

1 did not look at the letter. As a matter of fact, I haven't
2 seen it in approximately a year. I haven't specifically
3 looked at the letter.

4 Q. And is the last time Ms. Goodson-Eaddy showed you
5 the letter?

6 A. Yes, upon my request.

7 Q. Did she show you it to you initially upon your
8 request? Or you just requested to see it, again, about a
9 year ago?

10 A. I requested to see it the first time.

11 Q. She had told you that she received one?

12 A. Yes.

13 Q. Is that the only time you'd seen the letter was
14 when you asked her to see it?

15 A. I saw it a second time.

16 Q. Is that when you requested to see it again?

17 A. Yes, I did.

18 Q. And what were you looking for when you requested
19 to see the letter again?

20 A. The language that was used; signatures, people
21 that signed it; and to see whether I could believe it, that
22 this action was taking place.

23 Q. Why did you want to look at the signatures of who
24 signed it?

25 A. Because I wanted to know if all of the deacons

1 and all of the trustees were in agreement with that -- what
2 had been done.

3 Q. And did you ever go talk to any of the people
4 that signed the letter --

5 A. Not --

6 Q. -- about it?

7 A. Not at -- no, not about the case.

8 Q. About the letter?

9 A. No.

10 Q. What discussions have you had with those other
11 people you had mentioned, about this matter or about the
12 lawsuit?

13 A. I basically talked about her being excommunicated
14 from the church, name taken from the roll, and that I
15 didn't understand. Because the pastor never did convey to
16 the -- to the members his reasons for -- exactly for
17 putting her out. So I still didn't understand what level
18 that rose to in order for a person to be put out of the
19 church, and membership taken off the roll. And we
20 discussed other cases, like in California, where some
21 things had happened like that before, to other people.

22 Q. And what cases?

23 A. They didn't name exactly what cases that they
24 were talking about that, where pastors had put people out
25 of the church.

1 Q. Who was talking to you about cases?

2 A. Superior Edwards and Kevin Belton, we just
3 discussed -- just generally discussing that.

4 Q. You felt that during the meeting there should
5 have been more explanation about what Ms. Goodson-Eaddy had
6 done to deserve this kind of discipline.

7 A. I think that if you're going to -- according to
8 our constitution and bylaws, if you're going to
9 excommunicate someone from the church, the church members
10 need to know exactly why this is occurring.

11 Q. So you feel that more information about Ms.
12 Goodson-Eaddy's actions, about why Mr. Capers felt she was
13 a troublemaker, all of that should have been disclosed to
14 the members in order for them to have the information
15 needed to evaluate the situation?

16 A. I feel that if you're going to take actions such
17 as those, there need to be details instead of "I'm angry.
18 I'm mad. She's a troublemaker." What makes her a
19 troublemaker? Details.

20 Q. What else have you discussed about the lawsuit,
21 or about the events of that meeting with some of the others
22 that you mentioned, other than the cases in California?

23 A. Nothing else that I --

24 Q. And wanting more --

25 A. -- can recall. Nothing.

1 Q. And wanting more information that you discussed.
2 No other details that you remember?

3 A. Not at this time.

4 Q. In all your discussions with different people
5 about the lawsuit, did anyone have any further details on
6 anything that Travien Capers or any of the others had
7 actually said about Ms. Goodson-Eaddy, that would give you
8 some of those more details?

9 A. No.

10 Q. You're not aware of anyone, in and around the
11 church, that got any more information about Ms. Goodson-
12 Eaddy, other than what was mentioned at that meeting?

13 A. No, not about the case.

14 Q. Or about Ms. Goodson-Eaddy's actions? Did you
15 learn any more that anyone knew about what Mr. Capers said
16 about Ms. Goodson-Eaddy's actions?

17 A. I received a call from some -- a young man,
18 saying that she was a bully. But I don't know whether that
19 came from Capers or not, and --

20 Q. You don't know who called you and said that?

21 A. Yes, I do.

22 Q. Who said that?

23 A. Bernard Brailsford.

24 Q. And what was he saying?

25 A. That I -- he asked did I know that she was a

1 bully, and I told him, "No, that in all my years of knowing
2 her, I'd never known her to be a bully."

3 Q. But as far as you know, that was just coming from
4 him?

5 A. As far as I know.

6 Q. Anyone else who you're aware of said anything, or
7 had any more information on anything else said about Ms.
8 Goodson-Eaddy?

9 A. No.

10 Q. Have you understood all of my questions?

11 A. Yes, I have.

12 MR. FARR: All right. I don't have any
13 further for you.

14 MR. BEALE: I've just got a couple of quick
15 questions.

16 EXAMINATION BY MR. BEALE:

17 Q. Ms. Taylor, you've been a member of this church
18 for about 70-some years or --

19 A. Yes.

20 Q. -- at least gone to the church and then became a
21 member. But for all your life, basically.

22 A. Yes.

23 Q. And you're familiar with the fact that the church
24 is run by its constitution and bylaws; is that what you
25 understand?

1 A. Yes.

2 Q. And what is it that the constitution and bylaws
3 does, as you understand?

4 A. The constitution and bylaws govern our church.
5 And it's based upon the Bible and Roberts Rules.

6 Q. Right. And do you understand that issues such as
7 this matter here, excommunication, or putting -- putting
8 somebody out of the church, that these issues need to be
9 brought before the church congregation, and voted upon?

10 A. Yes.

11 Q. And to your knowledge, was that ever done in this
12 case?

13 A. No, it wasn't.

14 Q. What is your understanding about who took this
15 action?

16 A. My understanding is that the pastor and the
17 deacons who signed and the trustees who signed took that
18 action.

19 Q. Did all the deacons and trustees sign the letter?

20 A. No.

21 Q. And was the membership ever given notice that
22 there was going to ever be any vote taken on putting her
23 out of the church?

24 A. No.

25 Q. To the best of your knowledge, is that the way

1 the church was to be run, based on your constitution and
2 bylaws?

3 A. Yes.

4 Q. Okay. Does the pastor and the deacons and bylaws
5 have a right to just make these decisions, unilaterally,
6 without the -- the vote of the congregation?

7 A. According to our constitution and bylaws, any
8 major decisions have to be voted on by the members of the
9 church, because that -- we define the church as its
10 members.

11 Q. And that's who has -- that is the church, is the

12 --

13 A. That is the church.

14 Q. -- members. And I believe, if I understand
15 correctly, is Mr. Capers, is he ever a member of the
16 church?

17 A. No, he's not.

18 Q. Yet, he was the one that signed this letter,
19 along with some of the deacons and trustees.

20 A. Yes.

21 Q. But he was the one that was speaking out at this
22 meeting on September the 8th, Capers was.

23 A. Yes.

24 Q. And when he brought up this issue about wanting
25 to put her out of the church, what was the response of the

1 membership that was present?

2 A. They were against it.

3 Q. But was there any formal vote or anything taken?

4 A. There was no vote taken.

5 Q. And then as -- what you understand is, that after
6 September 8th, at that specially-called meeting, that she
7 received this letter that you've referred to, that was
8 dated August 30th?

9 A. Yes.

10 Q. And that was the letter that supposedly
11 excommunicated her from the church?

12 A. Yes.

13 MR. BEALE: Okay. That's all I got. Thank
14 you very much.

15 RE-EXAMINATION BY MR. FARR:

16 Q. Ms. Taylor, you understood at that September
17 meeting was, that Travien Capers was speaking to the
18 membership as in his role as pastor?

19 A. Yes.

20 Q. And you felt that he just did not explain fully
21 what he needed to explain to the members as pastor of the
22 church should?

23 A. He didn't explain to the church.

24 Q. And it was your understanding, after looking at
25 that letter, that the letter was being signed by Travien

1 Capers in his role as pastor, and by these deacons in their
2 role as deacons of the church?

3 A. Restate that, please.

4 Q. Sure. The letter that you have seen, that Ms.
5 Goodson-Eaddy showed you, do you remember that letter?

6 A. Yes.

7 Q. And Travien Capers signed it, correct?

8 A. Yes.

9 Q. And multiple deacons and trustees signed it,
10 correct?

11 A. Yes.

12 Q. Was it your understanding that they were signing
13 that as pastor and deacons and trustees of the church?

14 A. To my knowledge, yes.

15 MR. FARR: All right. I don't have any
16 further questions, then.

17 RE-EXAMINATION BY MR. BEALE:

18 Q. That raises one other question I wanted to ask
19 you. According to the constitution and bylaws, isn't it a
20 requirement that the pastor and the deacons and the
21 trustees be elected annually by the church?

22 A. Yes.

23 Q. And to the best of your knowledge, other than
24 2010 when Mr. Capers was hired as pastor, do you know of
25 any other votes that were ever taken on an annual basis to

1 elect him as pastor of the church? I'm talking about votes
2 by the congregation.

3 A. Explain that again -- or ask that again for me,
4 please.

5 Q. Yeah. Okay. I'd be glad to.

6 A. Details.

7 Q. At the annual conference that's held in January
8 of each year, the members, according to the constitution
9 and bylaws, are supposed to vote on a pastor and the
10 deacons and the trustees. Do you understand that?

11 A. I do.

12 Q. And my question is: To the best of your
13 knowledge, at the 2011 conference annual meeting, '12, '13,
14 '14, and even this year '15, has there ever been a vote on
15 hiring the pastor again as the pastor of the church?

16 A. No, not by ballot.

17 Q. Well, but is that the way you normally do elect
18 the pastor of the church, at the annual meeting, is by
19 written ballot?

20 A. Just the first time he was hired, he was elected
21 by written ballot. And since then there has not been no
22 written ballot on the pastor, nor the officers of the
23 church.

24 Q. That's right. Yeah. And so if he -- if he has
25 not -- if he and the trustees and deacons have not been

1 elected by the members of the church, as required by the
2 constitution, are they acting as pastor and deacons and
3 trustees if they're not properly elected?

4 A. They're acting, though not properly elected.

5 Q. So in other words, if you're not elected, do you
6 have the authority to act as the pastor or trustee or a
7 deacon of the -- if the people of the church have not voted
8 you in that position?

9 A. No, I don't think so.

10 MR. BEALE: That's all I've got.

11 RE-EXAMINATION BY MR. FARR:

12 Q. Ms. Taylor, how was the voting done? Was it by
13 voice vote?

14 A. Yes.

15 Q. So there's a voice vote at the January meeting
16 every year for the past for the deacons and the trustees?

17 A. Yes.

18 MR. FARR: Nothing further. Thank you.

19 MR. BEALE: Just a minute.

20 RE-EXAMINATION BY MR. BEALE:

21 Q. At these annual meetings from 2011 on, was the
22 members of the church given notice that there was going to
23 be a vote taken on whether or not they were hire or
24 continue to use the pastor and the deacons and trustees?

25 A. I don't remember, specifically, whether there was

1 or not. The members know that annually, in January, that
2 we have such a meeting. And I think -- I guess it's
3 expected to do that -- to do -- to take care of that kind
4 of business. But as -- it's just a voice-and-hand-raise
5 kind of thing -- voting that's done, instead of by ballot.

6 Q. I see. And when you have this annual meeting, is
7 each of the members required to sign in?

8 A. Yes.

9 Q. And how is it determined that the people who are
10 raising their hand are qualified to vote?

11 A. I don't know.

12 Q. Is there ever any mention of how many people are
13 needed to vote on these issues, such as the pastor and the
14 deacons and the trustees?

15 A. According to our constitution and bylaws, I think
16 -- I remember -- I think it's two-third majority.

17 Q. Two-thirds. Okay. And would you agree with me
18 that you have to determine that the people that are there
19 are qualified to vote?

20 A. Yes.

21 Q. And you don't know of anything that was ever done
22 to make that determination at any of these meetings.

23 A. I'm not sure about that.

24 MR. BEALE: Okay. Thank you.

25 Further deponent sayeth not.

1 (There being no further questions, the deposition
2 concluded at 10:54 a.m.)
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1 CERTIFICATE OF REPORTER

2 I, PATRICIA G. BACHAND, COURT REPORTER AND NOTARY
3 PUBLIC IN AND FOR THE STATE OF SOUTH CAROLINA AT LARGE,
4 HEREBY CERTIFY THAT I REPORTED THE DEPOSITION OF NADINE
5 TAYLOR, ON WEDNESDAY, THE 16TH DAY OF SEPTEMBER, 2015, THAT
6 THE WITNESS WAS FIRST DULY SWORN BY ME AND THAT THE
7 FOREGOING 35 PAGES CONSTITUTE A TRUE AND CORRECT
8 TRANSCRIPTION OF SAID DEPOSITION.

9 I FURTHER CERTIFY THAT I AM NEITHER ATTORNEY NOR
10 COUNSEL FOR, NOR RELATED TO OR EMPLOYED BY ANY OF THE
11 PARTIES CONNECTED WITH THIS ACTION, NOR AM I FINANCIALLY
12 INTERESTED IN SAID CAUSE.

13 I FURTHER CERTIFY THAT THE ORIGINAL OF SAID TRANSCRIPT
14 WAS THEREAFTER SEALED BY ME AND DELIVERED TO PETER E. FARR,
15 ESQ., MURPHY & GRANTLAND, PA, 4406-B FOREST DRIVE,
16 COLUMBIA, SOUTH CAROLINA, WHO WILL RETAIN THIS SEALED
17 ORIGINAL TRANSCRIPT AND SHALL BE RESPONSIBLE FOR FILING
18 SAME WITH THE COURT PRIOR TO TRIAL OR ANY HEARING WHICH
19 MIGHT RESULT IN A FINAL ORDER ON ANY ISSUE.

20 IN WITNESS WHEREOF, I HAVE SET MY HAND AND SEAL THIS
21 23RD DAY OF SEPTEMBER 2015.

22 _____
23 PATRICIA G. BACHAND, COURT REPORTER
24 MY COMMISSION EXPIRES APRIL 9, 2017
25

1 VERIFICATION OF DEPONENT
2

3 I, NADINE TAYLOR, HAVE READ THE FOREGOING DEPOSITION
4 CONSISTING OF 35 PAGES, WHICH WAS REPORTED BY PATRICIA G.
5 BACHAND, COURT REPORTER AND NOTARY PUBLIC IN AND FOR THE
6 STATE OF SOUTH CAROLINA, ON SEPTEMBER 16TH, 2015.

7 I FIND THE TRANSCRIPT OF THIS DEPOSITION TO BE A TRUE
8 AND ACCURATE TRANSCRIPT ACCORDING TO MY TESTIMONY ON THAT
9 DATE, WITH THE EXCEPTION OF _____, CHANGES AND/OR
10 CORRECTIONS LISTED ON THE ATTACHED ERRATA SHEET WHICH WAS
11 FILLED IN BY ME.
12

13 _____
14 NADINE TAYLOR

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16 _____, 2015
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This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears to be a standard notebook page or a sheet of stationery designed for writing. The edges of the paper are slightly irregular, suggesting it might be a scan of a physical document. There is no handwriting or other markings on the page.

Dated: _____

Nadine Taylor

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STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Carol Goodson-Eaddy,

Plaintiff,

v.

Travien L. Capers, Gregory A. Brown, Robert Davis, Herbert Bell, James Randolph, Jr., Harry Thompson, James Brown, Frank M. Jones, Edwin L. Rivers, Sr., Lever Thompson, Jr., Fred Davis, Harry L. Jones, Sr., David J. Clarkson, Larry B. Brown, Grady Wilson, and Dorothy B. Adams,

Defendants.

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO: 2014-CP-40-6224

ANSWERS TO DEFENDANTS'

**FIRST SET OF INTERROGATORIES TO
THE PLAINTIFF**

FILE

**TO: PETER E. FARR, ESQUIRE, ATTORNEY FOR DEFENDANTS, AND TO THE
DEFENDANTS ABOVE-NAMED:**

1. Give the names, addresses, and telephone numbers of persons known to the party or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements, police statements, or other interviews or statements have been taken from the witnesses and indicate who has possession of such statements.

ANSWER:

a. *Carol Goodson-Eaddy; 1204 Clarkson Rd; Hopkins, SC
29061; 803-776-7123;*

- b. *Travien L. Capers; 112 Westport Drive; Columbia, SC
29223; 803-843-6690;***
- c. *Robert Davis; 8329 Bluff Rd; Gadsden, SC 29052;
803-353-7138;***
- d. *Larry B. Brown; 421 Goodwin Way, Gadsden, SC 29252;
803-353-0875;***
- e. *James Brown; 207 Goodwin Way; Gadsden, SC 29052; 803-
353-7182;***
- f. *Harry L. Jones, Sr.; 200 Nazery Circle; Hopkins, SC 29061;
803-695-1904;***
- g. *Frank Jones; 161 Coolstream Drive; Columbia, SC 29223;
803-754-7847;***
- h. *Edwin Rivers; 109 Appleton Corner Way; Hopkins, SC
29061; 803-783-5078;***
- i. *Dorothy B. Adams; 117 Worrall Drive; Hopkins, SC 29061;
803-783-2973;***
- j. *David J. Clarkson; 1709 ThornDyke Drive, Columbia, SC
29204; 803-691-0039;***
- k. *James Randolph; 1475 Minervaville Rd; Hopkins, SC
29061; 803-776-9393;***

- l. Herbert Bell; 234 Nazery Circle; Hopkins, SC 29061;
803-351-1295;*
- m. Harry Thompson; 1240 Z C Clarkson Rd; Hopkins, SC
29061; 803-783-4812;*
- n. Gregory Brown; 1117 Weston Rd; Hopkins, SC 29061; 803-
776-5754;*
- o. Grady Wilson; 5021 Old Leesburg Rd; Hopkins, SC 29061;
803-477-5209;*
- p. Fred Davis; 401 Meetinghouse Rd; Hopkins, SC 29061; 803-
776-6764;*
- q. Lever Thompson Jr; 3104 Ulmer Rd; Columbia, SC 29209;
803-647-0054;*
- r. Nadine Taylor; 3015 Eastway Drive; Columbia, SC 29209;
803-776-4175.*

*No written or recorded statements taken from any witnesses herein
identified.*

- 2. Give the names and addresses of persons you intend to call as
witnesses at the trial of this case.

ANSWER:

- a. ***Carol Goodson-Eaddy; 1204 Clarkson Rd; Hopkins, SC 29061;***
- b. ***Travien L. Capers; 112 Westport Drive; Columbia, SC 29223;***
- c. ***Robert Davis; 8329 Bluff Rd; Gadsden, SC 29052;***
- d. ***Larry B. Brown; 421 Goodwin Way, Gadsden, SC 29052;***
- e. ***James Brown; 207 Goodwin Way; Gadsden, SC 29052;***
- f. ***Harry L. Jones, Sr.; 200 Nazery Circle; Hopkins, SC 29061;***
- g. ***Frank Jones; 161 Coolstream Drive; Columbia, SC 29223;***
- h. ***Edwin Rivers; 109 Appleton Corner Way; Hopkins, SC 29061;***
- i. ***Dorothy B. Adams; 117 Worrall Drive; Hopkins, SC 29061;***
- j. ***David J. Clarkson; 1709 Thorn Dyke Drive, Columbia, SC 29204;***
- k. ***James Randolph; 1475 Mineralville Rd; Hopkins, SC 29061;***
- l. ***Herbert Bell; 234 Nazery Circle; Hopkins, SC 29061;***
- m. ***Harry Thompson; 1240 Z C Clarkson Rd; Hopkins, SC 29061;***
- n. ***Gregory Brown; 1117 Weston Rd; Hopkins, SC 29061;***

- o. Grady Wilson; 5021 Old Leesburg Rd; Hopkins, SC 29061;*
 - p. Fred Davis; 401 Meetinghouse Rd; Hopkins, SC 29061;*
 - q. Lever Thompson Jr; 3104 Ulmer Rd; Columbia, SC 29209;*
 - r. Nadine Taylor; 3015 Eastway Drive; Columbia, SC 29209;*
3. Set forth a list of photographs, plats, sketches or other prepared documents in possession of the party that relates to the claim or defense in the case.

ANSWER:

- a. Zion Benevolent Baptist Church (hereinafter ZBBC)
Constitution & By-Laws, Adopted August, 1986 and Revised,
April, 2003.*
- b. "Robert Rules of Order" (Current Edition)*
- c. Emails and correspondence between Defendant Capers, all
other Defendants and Plaintiff, Ground Breaking Ceremony
April 13, 2014 none particularly April 14, 2014 letters,
April 17, 2014, July 22, 2014, July 23, 2014, August 30, 2014
and September 8, 2014.*
- d. Selected Minutes from Annual and Semi-Meeting of ZBBC.
1. ZBBC Meetings
2. January 18, 2005, 7:20pm; Minutes/Semi-Annual
Church Meeting,
July 20, 2004*

3. *Semi Annual Church Meeting, 7:00pm, July 26, 2005; Minutes/ January 18, 2005, Annual Church Meeting*
4. *Semi Annual Church, July 26, 2005; Minutes/Special Called Church Meeting, May 24, 2005, 7:00pm*
5. *Annual Church Meeting, 7:00pm; March 14, 2006; Minutes/July 26, 2005, Semi-Church Meeting*
6. *Semi-Annual Meeting, 7:10pm; July 18, 2006; Minutes/Annual Church Meeting, March 14, 2006*
7. *Annual Meeting, 7:08pm; Minutes/January 16, 2007;*
8. *Annual Meeting, 7:15pm; January 16, 2007; Minutes/July 18, 2006- Meeting officially cancelled;*
9. *Annual Church Meeting, 7:05pm; January 15, 2008, Minutes/Annual Meeting, January 16, 2007;*
10. *February 17, 2008 Letter written to ZBBC members (Case No.:2008-CP-40-1165)*
11. *July 16, 2008; Letter terminate Pastor Tucker;*
12. *March 2, 2010, Annual Church Meeting, 7:03pm Minutes/February 24, 2009;*
13. *Special Called Meeting, 7:00pm; April 28, 2009*
14. *Special Called Meeting, 7:09pm; August 11, 2009*
15. *Special Called Meeting, 7:04pm; November 16, 2009; Motion/Carol Eaddy;*
16. *Special Called Meeting, 7:00pm; December 14, 2009;*
17. *Special Called Meeting, 7:00pm; January 5, 2010; Motion read by Carol Goodson-Eaddy*
18. *Special Called Meeting, 7:00pm; January 19, 2010;*
19. *Meeting of/all members after Regular Church Services,; January 24, 2010*
20. *Special Called Meeting, 7:00pm; February 2, 2010*
21. *Semi Annual Meeting, 7:00pm; July 20, 2010; Second by Carol Eaddy to accept Felicia Robinson as church secretary*
22. *Special Called Meeting, 7:00pm; November 22, 2010*
23. *Semi Annual Church Meeting, 7:05pm; Minutes/July 19, 2011*
24. *Special Called Meetings, 6:52pm; Minutes/ November 21, 2011*
25. *Agenda Church Meeting, 7:00pm, 02/13/2012*
26. *Special Called Meeting, 7:00pm; February 13, 2012;*

27. *Special Called Meetings, May 15, 2012, 7:00pm; June 5, 2012, 7:00pm; June 24, 2012*
28. *Semi-Annual Church Meeting, 7:08pm; July 16, 2012; Minutes/January 17, 2012*
29. *Called Meeting, October 21, 2012; after church service*
30. *Annual Church Meeting, 7:00pm; January 14, 2013; Minutes/Semi-Annual Meeting, July 16, 2012*
31. *Church Meeting, 7:06pm; February 9, 2013; Minutes. Annual Meeting, January 14, 2013*
32. *Semi-Annual Church Meeting, July 15, 2013, Minutes/Annual Meeting; January 14 & February 10, 2013*
33. *Annual Church Meeting, 7:04pm; January 15, 2014, Semi-Annual Meeting on July 15, 2013*
34. *In 2013, Deacon Brown met with me after Sunday church service in the sanctuary and said, "He didn't sleep a week, because of asking questions that I should go along with the process, refrain from asking him, the pastor or any official questions in any church meetings.*
35. *Semi-Annual Church Meeting, 7:05pm July 21, 2014; Minutes/Annual Church Meeting, January 15, 2014*
36. *Annual Church Meeting, 7:07pm; January 14, 2015; Minutes/Semi-Annual Church Meeting, July 21, 2014*
37. *Letter from Pastor Capers request a meeting w/Carol Goodson-Eaddy, 12:27pm; July 22, 2014*
38. *Special Call Church Meeting, 7pm; Agenda; September 8, 2014(Palmetto Law Center) Main topic/Carol Goodson-Eaddy being excommunicated;*
39. *Pastor Capers sent an emailed/church family, 12:28pm; July 23, 2014; disrespectful to the Sanctuary and uncouth displays in the meeting;*
40. *August 18, 2014, Attorney Beale sent Pastor Capers a letter of Carol Goodson-Eaddy concerns and requesting a meet with Pastor Capers and Carol Goodson-Eaddy;*
41. *August 30, 2014, Letter of Excommunication written to Carol Goodson-Eaddy Signed by Defendants;*
42. *Pastor Capers, Deacon Gregory Brown, Carol Goodson-Eaddy email correspondences-Ground Breaking April 13, 2014-Re:(Roddy Egister)*

- 43. Emailed Deacon Gregory Brown, 11:45pm; April 14, 2014; Subject: Rody Egister, Contractor's status**
- 44. Answer from Deacon Gregory Brown/information discreet from membership, 12:17pm; April 16, 2014; Subject: Rody Egister, (Roddy Egister) Contractor**
- 45. Answered Deacon Brown/ Felt threatened, 1:45pm; April 16, 2014; What I meant by the threat, if I share the information with members in the church that I Carol Goodson-Eaddy was going to excommunicated.**
- 46. Reply from Deacon Gregory Brown/misunderstood/ 2:59pm; April 16, 2014;**
- 47. Answer from Pastor Capers/felt Deacon Brown was not threatening, 3:51pm; April 16, 2014**
- 48. Act in response to Pastor Capers email, 5:59pm; April 16, 2014;**
- 49. Correction I emailed to Pastor Capers, 6:21pm; April 16, 2014**
- 50. Emailed Deacon Brown/bringing awareness about Mr. Egister, 1:42pm; April 17, 2014;**
- 51. Letter from Pastor Capers request a meeting w/ Carol Goodson-Eaddy, 12:27pm; July 22, 2014; disrespectful to the sanctuary and uncouth displays in the meeting;**
- 52. Pastor Capers sent email to church family at the Semi-Annual (7-21-14) Church Meeting, members present were uncouth, 12:28pm; July 23, 2014**
- 53. August 18, 2014, Letter from Attorney Beale mailed to Pastor Capers;**
- 54. August 30, 2014; Letter of Excommunication written to Carol Goodson-Eaddy Signed by Defendants**
- 55. Special Call Church Meeting, 7pm; Agenda; September 8, 2014; (Palmetto Law Center) Main topic/ Carol Goodson-Eaddy being excommunicated**

4. Set forth a list of photographs, plats, sketches or other prepared documents of any kind which you intend to introduce as exhibits or evidence in the trial of the case.

ANSWER:

a. ***Minutes from Annual and Semi- Meetings of ZBBC. Zion
Benevolent***

- 1. ZBBC Meetings***
- 2. January 18, 2005, 7:20pm; Minutes/Semi-Annual
Church Meeting,
July 20, 2004***
- 3. Semi Annual Church Meeting, 7:00pm, July 26, 2005;
Minutes/ January 18, 2005, Annual Church Meeting***
- 4. Semi Annual Church, July 26, 2005; Minutes/Special
Called Church Meeting, May 24, 2005, 7:00pm***
- 5. Annual Church Meeting, 7:00pm; March 14, 2006;
Minutes/July 26, 2005, Semi-Church Meeting***
- 6. Semi-Annual Meeting, 7:10pm; July 18, 2006;
Minutes/Annual Church Meeting, March 14, 2006***
- 7. Annual Meeting, 7:08pm; Minutes/January 16, 2007;***
- 8. Annual Meeting, 7:15pm; January 16, 2007;
Minutes/July 18, 2006***
- 9. Annual Church Meeting, 7:05pm; January 15, 2008,
Minutes/Annual Meeting, January 16, 2007;***
- 10. February 17, 2008 Letter to ZBBC members
(Case No.: 2008-CP-40-1165)***
- 11. July 16, 2008; Letter to terminate Pastor Tucker;***
- 12. March 2, 2010, Annual Church Meeting, 7:03pm
Minutes/February 24, 2009;***
- 13. Special Called Meeting, 7:00pm; April 28, 2009***
- 14. Special Called Meeting, 7:09pm; August 11, 2009***
- 15. Special Called Meeting, 7:04pm; November 16, 2009;
Motion/Carol Eaddy;***
- 16. Special Called Meeting, 7:00pm; December 14, 2009***
- 17. Special Called Meeting, 7:00pm; January 5, 2010;
Motion read by Carol Goodson-Eaddy***
- 18. Special Called Meeting, 7:00pm; January 19, 2010;***
- 19. Meeting of/all members after Regular Church Services,;
January 24, 2010***
- 20. Special Called Meeting, 7:00pm; February 2, 2010***

21. *Semi Annual Meeting, 7:00pm; July 20, 2010; Second by Carol Eaddy to accept Felicia Robinson as church secretary*
22. *Special Called Meeting, 7:00pm; November 22, 2010*
23. *Agenda; January 18, 2011; Annual Church Meeting;*
24. *Semi Annual Church Meeting, 7:05pm; Minutes/July 19, 2011*
25. *Special Called Meetings, 6:52pm; Minutes/ November 21, 2011*
26. *Agenda Church Meeting, 7:00pm, 02/13/2012*
27. *Special Called Meeting, 7:00pm; February 13, 2012;*
28. *Special Called Meetings, May 15, 2012, 7:00pm; June 5, 2012, 7:00pm; June 24, 2012*
29. *Semi-Annual Church Meeting, 7:08pm; July 16, 2012; Minutes/January 17, 2012*
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33. *Semi-Annual Church Meeting, July 15, 2013, Minutes/Annual Meeting; January 14& February 10, 2013*
34. *Annual Church Meeting, 7:04pm; January 15, 2014, Semi-Annual Meeting on July 15, 2013*
35. *In 2013, Deacon Brown met with me after Sunday church service in the sanctuary and said, "He didn't sleep a week, because of asking questions that I should go along with the process, refrain from asking him, the pastor or any official questions in any church meetings.*
36. *Semi-Annual Church Meeting, 7:05pm July 21, 2014; Minutes/Annual Church Meeting, January 15, 2014*
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38. *Letter from Pastor Capers request a meeting w/Carol Goodson-Eaddy, 12:27pm; July 22, 2014*
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40. *Pastor Capers sent an emailed/church family, 12:28pm; July 23, 2014 ; Ground Breaking , April 13, 2014Re: Roddy Egister*
41. *August 30, 2014, Letter of Excommunication written to Carol Goodson-Eaddy Signed by Defendants*
42. *Pastor Capers, Deacon Gregory Brown, Carol Goodson-Eaddy email correspondences*
43. *Emailed Deacon Gregory Brown, 11:45pm; April 14, 2014; Subject: Rody Egister, (Roddy Egister) Contractor's status*
44. *Answer from Deacon Gregory Brown/information discreet from membership, 12:17pm; April 16, 2014; Subject: Rody Egister, (Roddy Egister) Contractor;*
45. *Answered Deacon Brown/ Felt threatened, 1:45pm; April 16, 2014; What I meant by the threat, if I share the information with members in the church that I Carol Goodson-Eaddy was going to excommunicated.*
46. *Reply from Deacon Gregory Brown/misunderstood/ 2:59pm; April 16, 2014;*
47. *Answer from Pastor Capers/felt Deacon Brown was not threatening, 3:51pm; April 16, 2014*
48. *Act in response to Pastor Capers email, 5:59pm; April 16, 2014;*
49. *Correction I emailed to Pastor Capers, 6:21pm; April 16, 2014*
50. *Emailed Deacon Brown/bringing awareness about Mr. Egister, 1:42pm; April 17, 2014; April 17, 2014@ 2:34 p.m. Received email from Pastor Capers;*
51. *Letter from Pastor Capers request a meeting w/ Carol Goodson-Eaddy, 12:27pm; July 22, 2014;*
52. *Pastor Capers sent email to church family at the Semi-Annual (7-21-14) Church Meeting, members present were uncouth, 12:28pm; July 23, 2014*
53. *August 18, 2014, Attorney Beale sent Pastor Capers a letter requesting a meeting with Pastor Capers and Carol Goodson-Eaddy.*
54. *August 30, 2014; Letter of Excommunication written to Carol Goodson-Eaddy Signed by Defendants*

55.Special Call Church Meeting, 7pm; Agenda; September 8, 2014; (Palmetto Law Center) Main topic/ Carol Goodson-Eaddy being excommunicated

5. Set forth the names and addresses of all physicians, chiropractors, psychiatrists, psychologists, counselors, or other health care professionals who have treated the party and all hospitals to which the party has been committed in connection with the said injuries and also set forth a statement of all medical costs involved, indentifying the costs associated with each medical provider.

ANSWER:

Dr. Baker Blair, VA Hospital, Columbia, South Carolina, Costs to be provided at a later date.

6. Set forth the names and addresses of all physicians or other health care professionals who have treated the party and all hospitals or other medical facilities to which the party has been committed in the last ten years for something other than the incidents giving rise to this lawsuit, and give the dates and reasons for each treatment.

ANSWER:

Plaintiff has been treated regularly at the VA Hospital, Columbia, S.C. Dr. Prashed private physician who retired and no longer in

private practice. Dates and reasons for treatment to be provided later.

7. Please provide a detailed explanation of the party's alleged physical disability (if any) as a result of the incident in question.

ANSWER:

Non-applicable

8. Set forth a statement of all other damages claimed to have been sustained by the party.

ANSWER:

VA Hospital medical bills, defamation of character, public humiliation, shunned by people, more nervous, the fear of being spotted alone, may cause bodily harm. Impatience with husband from the stress of this case, withdrawn, depressed, cry when alone. Felt violated and stoned by fifteen men, who are the Defendants, while one woman who is the sixteen Defendant cheered them on. Overwhelmed with this matter, known in the church and community as a trouble maker. Results felt that I 'Carol Goodson-Eaddy' needed counseling.

9. List the names and addresses of any expert witnesses whom the party proposes to use as a witness at the trial of the case.

ANSWER:

None accept for the Physicians hereinabove identified.

10. For each expert witness, please provide the following:
 - a. State the expert's qualifications;
 - b. State the subject matter on which each expert is expected to testify;
 - c. State the substance of the facts and opinions to which the expert is expected to testify; and
 - d. Summarize the grounds for each opinion.

ANSWER:

See medical reports attached to Plaintiff's response to Request to Produce.

11. For each person known to the party or counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

ANSWER:

Nadine Taylor was present when the Defendants defamed Plaintiff in front of her and other members of the ZBBC Congregation.

12. Please describe in detail the nature of the party's alleged emotional distress and mental anguish (if any) as a result of the incident in question.

ANSWER:

VA Hospital medical bills, defamation of character, public humiliation, shunned by people, more nervous, the fear of being spotted alone, may cause bodily harm. Impatience with husband from the stress of this case, withdrawn, depressed, cry when alone. Felt violated and stoned by fifteen men, who are the Defendants, while one woman who is the sixteen Defendant cheered them on. Overwhelmed with this matter, known in the church and community as a trouble maker. Results felt that I 'Carol Goodson-Eaddy' needed counseling.

13. If the party is claiming lost wages or loss of earning capacity (past or future), please set forth the exact amounts of lost income and/or loss of earning capacity, the dates which you lost time for work, and the employers from whom you lost time for work.

ANSWER:

Non-applicable.

14. Describe in detail the nature of any alleged injuries (past and future) you allege you suffered as a result of the incident in question.

ANSWER:

VA Hospital medical bills, defamation of character, public humiliation, shunned by people, more nervous, the fear of being spotted alone, may cause bodily harm. Impatience with husband from the stress of this case, withdrawn, depressed, cry when alone. Felt violated and stoned by fifteen men, who are the Defendants, while one woman who is the sixteen Defendant cheered them on. Overwhelmed with this matter, known in the church and community as a trouble maker. Results felt that I 'Carol Goodson-Eaddy' needed counseling.

15. State your date of birth, driver's license number, Social Security number, telephone numbers and providers for all phones (landlines and cellular) in the past ten (10) years, and any other names you have gone by during your lifetime.

ANSWER:

Plaintiff's date of Birth is [REDACTED]; Plaintiff's SC Driver's license No. [REDACTED]; Plaintiff's SS# is [REDACTED]; Plaintiff's telephone No's are home-[REDACTED], fax no- [REDACTED], and

mobile [REDACTED]; other names Plaintiff's has been known as are Carol Carleen Goodson, Carol Hill, Carol Dyckes, and Carol Eaddy.

16. State your addresses as well as the names and ages of all persons residing in your household from 2005 to present along with the dates of each person's residency.

ANSWER:

Plaintiff's addresses from 2005 to present are

a. 1204 Clarkson Rd, Hopkins, SC 29061

(1) Plaintiff has lived at this address since 2005 with William Daniel Eaddy, her husband.

(2) Also living there was Shawn Hill and Shane Dyckes, Plaintiff's sons.

(3) Also living there was Plaintiff's cousins Catasha Bell-Browning and her daughters Amaya, Amani, and Aliah. They lived with Plaintiff from July, 2013 to July, 2014 and they now reside in Georgia.

17. Describe how the occurrences complained of in this action happened in comprehensive, narrative detail, giving all events in the order in which they

occurred before, during, or after the occurrence, which had any bearing on the cause and manner of the occurrence.

ANSWER:

VA Hospital medical bills, defamation of character, public humiliation, shunned by people, more nervous, the fear of being spotted alone, may cause bodily harm. Impatience with husband due to this case, continue to bake to ease mind, disappointed, because the majority of the Defendants supported me, "Carol Goodson-Eaddy" financially in the prior church matter, felt used, depressed and stressed; known in the church and community as a trouble maker.

18. As to each alleged instance of defamation against the Plaintiff, provide to the greatest detail possible:

- a. The date of each alleged instance;

ANSWER: *Correspondences from Defendants dated*

7/22/14, 7/23/14, August 30, 2014 and 9/8/14 also instances occurred 4/14/14, 4/16/14, and 4/17/14.

- b. The place (state, address and location within the address) and time each instance occurred;

ANSWER: *201 Meetinghouse Road, Hopkins, S.C. 29061; also occurred in emails and phones calls.*

- c. The person who defamed the Plaintiff;

ANSWER: All of the named Defendants and times and places hereinabove identified.

- d. To whom the Plaintiff was defamed;

ANSWER: All of the named Defendants and times and places herein identified.

- e. Any individuals at the location at the time of the alleged instance, regardless of whether the individual was a witness;

ANSWER: Members in the Congregation who attended the Special Called Meeting on 9/8/14

1. Carol Goodson-Eaddy

2. Nadine Taylor

3. Anthony Brown

4. Harry Thompson

5. Larry B. Brown

6. Helen W. Brown

7. Carrie Bell Brown

8. Rosa Johnson

9. Ida Randolph

10. Willard Steed

11. Marian Gibson

12. John Gibson

13. Herbert Randolph

14. Charles Belton

15. Inez Belton

16. Ora Bell Green

17. Teresa Wilson

18. Grady Wilson

19. Patricia Goodwin

20. Betty Nowell

21. Frank Jones

22. Harry Lee Jones

- 23. Regina Anderson**
- 24. Ella Sumter**
- 25. Amy Jowers**
- 26. Luther Jowers**
- 27. Gwen Manning**
- 28. Vanessa Wimbush**
- 29. Thomas A. Goodson**
- 30. Sandra Johnson**
- 31. Lillie Wilson**
- 32. John Wilson**
- 33. Bertha Jones**
- 34. Eloise Daniels**
- 35. Fred Davis**
- 36. Valerie Rivers**
- 37. Jessica Robinson**
- 38. David Riley**
- 39. Gregory Brown**
- 40. James Randolph**
- 41. Herbert Bell**
- 42. Brenda Goodwin**
- 43. Willis Brown**
- 44. David Jerome 'Ronnie' Clarkson**
- 45. Elaine Clarkson**
- 46. John Randolph**
- 47. Lever Thompson**
- 48. Lilly Mae Thompson**
- 49. April Griffin**
- 50. Ann I Jones**
- 51. Vivian Lowman**
- 52. Sebrenna Goodson**
- 53. Ella Mae Thompson (Deceased May 10, 2015)**
- 54. Edwin Rivers**
- 55. James Brown**
- 56. Felicia Robinson**
- 57. Grady Wilson**
- 58. Travien Capers**
- 59. Robert Davis**
- 60. Elizabeth Adams**
- 61. Ivy Davis**
- 62. Willie Gilyard**

- 63. Mary Jane Montgomery**
- 64. Marie Jones**
- 65. Kenny Randolph**
- 66. Ashley Faulks**
- 67. Joe Randolph**
- 68. James Hopkins**
- 69. Laura Kelly**
- 70. Julia Anderson**
- 71. Earlene Henry**
- 72. Carrie Goodwin**

f. A narrative account of each instance of defamation, giving all events in the order in which they occurred before, during or after the occurrence, including the manner in which any defamatory statements were published; and

ANSWER: *See correspondences dated 7/22/14, 7/23/14, 8/30/14 and 9/8/14, all previously discussed.*

g. Identify any documents containing the alleged defamatory writing.

ANSWER: *Plaintiff would refer you back to ZBBC Minutes of meeting held by the church.*

- 1. ZBBC Meetings**
- 2. January 18, 2005, 7:20pm; Minutes/Semi-Annual Church Meeting, July 20, 2004**
- 3. Semi Annual Church Meeting, 7:00pm, July 26, 2005; Minutes/ January 18, 2005, Annual Church Meeting**
- 4. Semi Annual Church, July 26, 2005; Minutes/Special Called Church Meeting, May 24, 2005, 7:00pm**
- 5. Annual Church Meeting, 7:00pm; March 14, 2006; Minutes/July 26, 2005, Semi-Church Meeting**
- 6. Semi-Annual Meeting, 7:10pm; July 18, 2006; Minutes/Annual Church Meeting, March 14, 2006**
- 7. Annual Meeting, 7:08pm; Minutes/January 16, 2007;**
- 8. Annual Meeting, 7:15pm; January 16, 2007;**
- 9. February 17, 2008; Letter to ZBBC members**

(Case No.2008-CP-40-1165)

- 10. July 16, 2008 Letter to terminate Pastor Tucker;**
- 11. Minutes/July 18, 2006-Meeting officially cancelled, however they have minutes.**
- 12. Annual Church Meeting, 7:05pm; January 15, 2008, Minutes/Annual Meeting, January 16, 2007;**
- 13. March 2, 2010, Annual Church Meeting, 7:03pm Minutes/February 24, 2009;**
- 14. Special Called Meeting, 7:00pm; April 28, 2009**
- 15. Special Called Meeting, 7:09pm; August 11, 2009**
- 16. Special Called Meeting, 7:04pm; November 16, 2009; Motion/Carol Eaddy;**
- 17. Special Called Meeting, 7:00pm; December 14, 2009**
- 18. Special Called Meeting, 7:00pm; January 5, 2010; Motion read by Carol Goodson-Eaddy**
- 19. Special Called Meeting, 7:00pm; January 19, 2010;**
- 20. Meeting of/all members after Regular Church Services,; January 24, 2010**
- 21. Special Called Meeting, 7:00pm; February 2, 2010**
- 22. Semi Annual Meeting, 7:00pm; July 20, 2010; Second by Carol Eaddy to accept Felicia Robinson as church secretary**
- 23. Special Called Meeting, 7:00pm; November 22, 2010**
- 24. Semi Annual Church Meeting, 7:05pm; Minutes/July 19, 2011**
- 25. Special Called Meetings, 6:52pm; Minutes/ November 21, 2011**
- 26. Agenda Church Meeting, 7:00pm, 02/13/2012**
- 27. Special Called Meeting, 7:00pm; February 13, 2012;**
- 28. Special Called Meetings, May 15, 2012, 7:00pm; June 5, 2012, 7:00pm; June 24, 2012**
- 29. Semi-Annual Church Meeting, 7:08pm; July 16, 2012; Minutes/January 17, 2012**
- 30. Called Meeting, October 21, 2012; after church service**
- 31. Annual Church Meeting, 7:00pm; January 14, 2013; Minutes/Semi-Annual Meeting, July 16, 2012**
- 32. Church Meeting, 7:06pm; February 9, 2013; Minutes. Annual Meeting, January 14, 2013**

33. *Semi-Annual Church Meeting, July 15, 2013, Minutes/Annual Meeting; January 14& February 10, 2013*
34. *Annual Church Meeting, 7:04pm; January 15, 2014, Semi-Annual Meeting on July 15, 2013*
35. *In 2013, Deacon Brown met with me after Sunday church service in the sanctuary and said , "he didn't sleep a week, because of asking questions that I should go along with the process, refrain from asking him or the pastor questions in any church meetings.*
36. *Semi-Annual Church Meeting, 7:05pm July 21, 2014; Minutes/Annual Church Meeting, January 15, 2014*
37. *Special Call Church Meeting, 7pm; Agenda; September 8, 2014(Palmetto Law Center) Main topic/Carol Goodson-Eaddy being excommunicated*
38. *Annual Church Meeting, 7:07pm; January 14, 2015; Minutes/Semi-Annual Church Meeting, July 21, 2014*
39. *Letter from Pastor Capers request a meeting w/Carol Goodson-Eaddy, 12:27pm; July 22, 2014*
40. *Pastor Capers sent an emailed/church family, 12:28pm; July 23, 2014*
41. *August 18, 2014, Attorney Beal mailed letter to Pastor Capers about Carol Goodson-Eaddy concerns;*
42. *August 30, 2014, Letter of Excommunication written to Carol Goodson-Eaddy Signed by Defendants*
43. *Pastor Capers, Deacon Gregory Brown, Carol Goodson-Eaddy email correspondences*
44. *Emailed Deacon Gregory Brown, 11:45pm; April 14, 2014; Subject:Rody Eigster, Contractor's status*
45. *Answer from Deacon Gregory Brown/informationdiscreet from membership, 12:17pm; April 16, 2014; Subject: Rody Egister, Contractor*
46. *Answered Deacon Brown/ Felt threatened, 1:45pm; April 16, 2014; What I meant by the threat, if I share the information with members in the church that I Carol Goodson-Eaddy was going to excommunicated. In 2013, Deacon Brown had met with me after Sunday church service in the sanctuary and said , "he didn't sleep a week, because of asking questions that I should go along*

- with the process, refrain from asking him, the pastor or any official questions in any church meetings.*
- 47. Reply from Deacon Gregory Brown/misunderstood/ 2:59pm; April 16, 2014;*
 - 48. Answer from Pastor Capers/felt Deacon Brown was not threatening, 3:51pm; April 16, 2014*
 - 49. Act in response to Pastor Capers email, 5:59pm; April 16, 2014;*
 - 50. Correction I emailed to Pastor Capers, 6:21pm; April 16, 2014*
 - 51. Emailed Deacon Brown/bringing awareness about Mr. Egister, 1:42pm; April 17, 2014;*
 - 52. Letter from Pastor Capers request a meeting w/ Carol Goodson-Eaddy, 12:27pm; July 22, 2014;*
 - 53. Pastor Capers sent email to church family at the Semi-Annual (7-21-14) Church Meeting, members present were uncouth, 12:28pm; July 23, 2014*
 - 54. August 18, 2014, Attorney Beale mailed Pastor Capers a letter of concerns from Carol Goodson-Eaddy.;*
 - 55. August 30, 2014; Letter of Excommunication written to Carol Goodson-Eaddy Signed by Defendants*
 - 56. Special Call Church Meeting, 7pm; Agenda; September 8, 2014; (Palmetto Law Center) Main topic/ Carol Goodson-Eaddy being excommunicated*

19. State whether the Plaintiff has made any other claims against others or sought or received remuneration from others relating to the incident alleged in the Complaint.

ANSWER:

None

20. Please state the Plaintiff's, place of birth, educational background, present address, and present occupation.

ANSWER:

- (a) Plaintiff place of birth is Hopkins, South Carolina;***
- (b) She attended two years of college***
- (c) Her present address is 1204 Clarkson Road, Hopkins, SC
29061***
- (d) Disabled Veteran.***

21. Describe any criminal record that the Plaintiff may have, including the nature of the charge, date and place of arrest, and conviction, if any.

ANSWER:

None

22. If the party has ever been involved in any other legal action, whether family, criminal, or civil, either as a Plaintiff or Defendant, give the court, case number, names of other parties, counsel for parties, description of the action and disposition of each.

ANSWER:

***Burlington Coat Factory; 5-19-2008, and ZBBC v. Gerald A.
Tucker, February 14, 2008***

23. Identify all insurance claims made by the party in the last five (5) years, including the name of the carrier, the type of policy and policy number under which the claim was made, the type of claim, and the amount of the claim.

ANSWER:

Burlington Coat Factory; 5-19-2008, and ZBBC v. Gerald A. Tucker, February 14, 2008

24. Identify the date the Plaintiff first retained counsel in this matter.

ANSWER:

August 18, 2014; Palmetto Law Center, P.C.

25. Identify all agents, servants, representatives, private investigators, or others who made any investigation into this incident on the party's behalf.

ANSWER:

None

26. Identify any and all documents you have sent to any of the Defendants.

ANSWER:

Seek dismissal of Deacon Frank Jones Minutes of a Special Called Meeting on 1/5/10.

27. Identify any and all documents in your possession received from or relating to the Defendants.

ANSWER:

Zion Benevolent Baptist Church (hereinafter ZBBC)

Constitution & By-Laws, Adopted August, 1986 and Revised, April, 2003.

“Robert Rules of Order” Current edition

Emails and correspondence between Defendant Capers, all

Defendants named Defendant and Plaintiff, Ground

Breaking Ceremony, April 13, 2014 none particularly April

14, 2014 letters, April 16, 2014 April 17, 2014, July 22, 2014,

July 23, 2014, August 30, 2014 and September 8, 2014.

See medical reports attached to Plaintiff’s response to

Request to Produce. And see question 18.

28. Please identify all social networking websites, internet groups, forums, organizations, or other entities of which Plaintiff is a member, has an account or identifying information concerning internet websites such as, but not limited to, Facebook, My Space, Twitter, Linked In, InstaGram, etc.

ANSWER:

ecread.net

PALMETTO LAW CENTER, P.C.



**Hammond A. Beale, Esquire
P.O. Box 9526
Columbia, South Carolina 29290
(803) 783-4570
(803) 776-7862
Attorneys for the Plaintiff**

Columbia, South Carolina

May 15, 2015

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Carol Goodson-Eaddy,

Plaintiff,

v.

Travien L. Capers, Gregory A. Brown, Robert Davis, Herbert Bell, James Randolph, Jr., Harry Thompson, James Brown, Frank M. Jones, Edwin L. Rivers, Sr., Lever Thompson, Jr., Fred Davis, Harry L. Jones, Sr., David J. Clarkson, Larry B. Brown, Grady Wilson, and Dorothy B. Adams,

Defendants.

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO: 2014-CP-40-6224

PLAINTIFF'S ANSWER TO

**DEFENDANTS' FIRST SET OF REQUEST
FOR PRODUCTION**

FILE

**TO: PETER E. FARR, ESQUIRE, ATTORNEY FOR DEFENDANTS, AND TO THE
DEFENDANTS ABOVE-NAMED:**

1. All medical and psychological reports, bills, hospital records or any other bills, reports or records relating to any alleged personal injury.

ANSWER:

Records from VA Hospital, Columbia, S.C.

2. All repair bills, estimates, reports, or other written or printed documents relating to any claimed damage to personal or real property.

ANSWER:

None

3. All statements or any other written or printed documents concerning any claims for lost wages, income or for any other damages allegedly resulting from the incident as set forth in the Complaint.

ANSWER:

None

4. All photographs, diagrams, drawings, or other similar material relating to the claims set forth in the Complaint.

ANSWER:

Emails and correspondences between Defendant Deacon Greg Brown, Defendant Capers and Plaintiff; Ground Breaking Ceremony April 13, April 14, 16, and 17, 2014; ones dated July 22, 2014, July 23, 2014, August 30, 2014 and September 8, 2014.

5. All statements of possible witnesses, whether written, oral, summarized, or otherwise reproduced in any manner, relating to the incident as set forth in the Complaint.

ANSWER:

None

6. Any and all expert's files, notes or reports.

ANSWER:

See medical reports from VA Hospital, Columbia, S.C.,

7. Any and all documents (paper or electronically stored on phone or computer or any other electronic device) relating to the incident alleged in the Complaint, or to any Defendant, including but not limited to emails, correspondence, text messages, statements, communications, receipts, brochures, flyers, handouts, or bulletins.

ANSWER:

See emails and correspondences referenced in our response to question 4.

8. All tax returns, both Federal and State returns, for the five (5) years preceding the incident set forth in the Complaint as well as any returns made subsequent to the incident set forth in the Complaint.

ANSWER:

Not applicable as Plaintiff does not claim lost wages.

9. Any documents, of any kind, referenced in Plaintiff's Answers to Defendants' Interrogatories.

ANSWER:

*Constitution and Bylaws of Zion Benevolent Baptist Church
(hereinafter ZBBC) adopted August, 1986 and Revised April, 2003.*

1. ZBBC Meetings

*2. January 18, 2005, 7:20pm; Minutes/Semi-Annual Church
Meeting,*

- July 20, 2004;*
- 3. Semi Annual Church Meeting, 7:00pm, July 26, 2005;*
- January 18, 2005, Annual Church Meeting;*
- 4. Semi Annual Church, July 26, 2005; Special Called*
- Church Meeting, May 24, 2005, 7:00pm;*
- 5. Annual Church Meeting, 7:00pm; March 14, 2006; July*
- 26, 2005, Semi-Church Meeting;*
- 6. Semi-Annual Meeting, 7:10pm; July 18, 2006; Annual*
- Church Meeting, March 14, 2006;*
- 7. Annual Meeting, 7:08pm; January 16, 2007;*
- 8. Annual Meeting, 7:15pm; January 16, 2007; July 18, 2006*
- 9. Annual Church Meeting, 7:05pm; January 15, 2008,*
- Annual Meeting, January 16, 2007;*
- 10. February 17, 2008 letter written to ZBBC Members*
- (Case No.: 2008-CP-40-1165)*
- 11. July 16, 2008, Letter to terminate Pastor Tucker;*
- 12. March 2, 2010, Annual Church Meeting, 6:55pm;*
- February 24, 2009;*
- 13. Special Called Meeting, 7:00pm; April 28, 2009;*
- 14. Special Called Meeting, 7:09pm; August 11, 2009;*

- 15.Special Called Meeting, 7:04pm; November 16, 2009;***
- 16.Special Called Meeting, 7:00pm; December 14, 2009***
- 17.Special Called Meeting, 7:00pm; January 5, 2010;***
- 18.Special Called Meeting, 7:00pm; January 19, 2010;***
- 19.Meeting of/all members after Regular Church Services,;***
January 24, 2010;
- 20.Special Called Meeting, 7:00pm; February 2, 2010;***
- 21.Semi Annual Meeting, 7:00pm; July 20, 2010;***
- 22.Special Called Meeting, 7:00pm; November 22, 2010;***
- 23.Agenda, January 18, 2011, Annual Church Meeting;***
- 24.Semi Annual Church Meeting, 7:05pm; July 19, 2011;***
- 25.Special Called Meetings, 6:52pm; November 21, 2011;***
- 26.Agenda Church Meeting, 7:00pm, 02/13/2012; Special***
Called Meeting, 2/13/12, 7:00pm;
- 27.Special Called Meeting, 7:00pm; February 13, 2012;***
- 28.Special Called Meetings, May 15, 2012, 7:00pm; June 5,***
2012, 7:00pm; June 24, 2012;
- 29.Semi-Annual Church Meeting, 7:08pm; July 16, 2012;***
January 17, 2012;
- 30.Called Meeting, October 21, 2012; after church service;***

31. Annual Church Meeting, 7:00pm; January 14, 2013;

Minutes, July 16, 2012;

32. Church Meeting, 7:06pm; February 9, 2013; Annual

Meeting, January 14, 2013;

33. Semi-Annual Church Meeting, July 15, 2013, Annual

Meeting; January 14 & February 10, 2013;

34. Annual Church Meeting, 7:04pm; January 15, 2014,

Semi-Annual Meeting on July 15, 2013;

35. In 2013, Deacon Brown met with me after Sunday church

service in the sanctuary and said, "He didn't sleep a week,

because of asking questions that I should go along with the

process, refrain from asking him, the pastor or any official

questions in any church meetings.

36. Semi-Annual Church Meeting, 7:00pm July 21, 2014;

Annual Church Meeting, January 15, 2014;

37. Letter from Pastor Capers request a meeting w/Carol

Goodson-Eaddy, 12:27pm, July 22, 2014;

38. Pastor Capers sent email to church family/members at the

Semi-Annual (7-21-14) disrespectful to the sanctuary, and

uncouth displays in the meeting 12:28pm,

July 23, 2014;

***39. August 18, 2014; Attorney Beale mailed letter to Pastor
Capers;***

***40. Letter of Excommunication written to Carol Goodson-
Eaddy Signed by Defendants;***

***41. Special Call Church Meeting, 7pm; Agenda; September 8,
2014(Palmetto Law Center) Main topic/Carol Goodson-
Eaddy being excommunicated***

***42. Annual Church Meeting, 7:07pm; January 14, 2015;
Semi-Annual Church Meeting, July 21, 2014***

***43. Pastor Capers, Deacon Gregory Brown, Carol Goodson-
Eaddy email correspondences; emailed Deacon Gregory
Brown, April 13, 2014 attend Ground Breaking Ceremony
and 11:45pm, April 14, 2014, Subject: Rody Egister,
Contractor's status;***

***44. Answer from Deacon Gregory Brown/ information discreet
from membership, 12:17pm, April 16, 2014, Subject: Rody
Egister, Contractor;***

***45. Answered Deacon Brown/ felt threatened, 1:45pm, April
16, 2014; What I meant by the threat, if 'I Carol Goodson-***

Eaddy' shared information with members in the church that I was going to be put out of the church. I really couldn't understand what Deacon Gregory Brown was implying, when I had concerns that needed to be addressed.

46. Reply from Deacon Gregory Brown/ misunderstood his email/, 2:5pm, April 16, 2014;

47. Answer from Pastor Capers/ felt Deacon Brown was not threatening, 3:51pm, April 16, 2014;

48. Act in response to Pastor Capers' email, 5:59pm, April 16, 2014;

49. Correction emailed to Pastor Capers, 6:21pm, April 16, 2014;

50. Emailed Deacon Brown/bringing awareness about Mr. Egister, 1:42pm; April 17, 2014;

51. Pastor Capers answered April 17, 2014 at 2:34pm

10. Any documents, of any kind, used or consulted when answering Defendants' Interrogatories to Plaintiffs.

ANSWER:

Constitution and Bylaws of Zion Benevolent Baptist Church

(hereinafter ZBBC) adopted August, 1986 and Revised April, 2003.

11. Please permit counsel for Defendant to access, inspect, and copy all of Plaintiff's accounts to any social networking websites, internet groups, forums, organizations, or other entities identified by Plaintiff in response to Defendant's Interrogatories. This request is intended to include access to all written materials, information, correspondence, writings, internet posts, updates, email, photographs, email, etc. contained in the accounts or profiles so identified.

ANSWER:

None

PALMETTO LAW CENTER, P.C.



Hammond A. Beale, Esquire
P.O. Box 9526
Columbia, South Carolina 29290
(803) 783-4570
(803) 776-7862
SC Bar No.: 599
Attorneys for the Plaintiff

Columbia, South Carolina

May 15, 2015

Subject: Last Night

From: revtcapers@bellsouth.net (revtcapers@bellsouth.net)

To: soso24@bellsouth.net;

Date: Tuesday, July 22, 2014 12:27 PM

Sister Carleen,

I pray your day is going well and God's mercies have been renewed for you. I wanted to know your availability for a good day and time we could sit and speak concerning a few matters. The meeting last night was disappointing and I had more than a few "concerned members" to speak with me between last night and this morning concerning the exchanges.

I'd like to speak with you, and possibly your husband (should you desire his presence there) regarding what seems a habitual cycle of what are being seen as disruptions in the church's formal meetings and the level of disrespect shown toward the officers of our church. Please let me be clear in saying I don't feel as if anything was directed toward me personally, but I stand with the officials of our church when we make presentations, so it's my obligation to see if matters need to be discussed further and quickly assuage any perceived misconceptions.

We want members that have questions to please raise them, but do so in a manner that respects our sanctuary and reflects a Christian character. In the discourse had on last night comments were made that challenged the personal integrity of one of our officers and such wasn't appreciated. The meeting as a whole on last night was forgettable, as some have been in the past and I am seeking to absolve any future meetings ending in similar fashion. Again, please let me know your availability for us to speak. Should you desire your husband to come, please know I have no issue with speaking before him, but these matters must be resolved quickly because there is unrest in the church regarding your disposition in these meetings.

As always, you know how to reach me should you have any questions, comments or concerns. Please send my warmest regards to your family.

Yours Because of Calvary,

Pastor Capers

Sent from my iPhone



Annual Meeting

January 14, 2013 @ 7pm

Devotion by Deacons

Opening Prayer

Meeting Called to Order

Old Business

Reading of Minutes

Unfinished Business (if any)

New Business

Financial Reports

Bereavement Packet

Minister(s) of Music (To be presented by Deacon Brown)

Building Project (To be presented by Deacon Brown)

Election of Officers (To be presented by Deacon Brown)

Closing Prayer/Benediction/Meeting Adjourned

Zion Benevolent Baptist Church
Church Meeting
February 9, 2013
(Minutes from Annual Meeting on January 14, 2013)

6:53 pm Devotion by Deacons
7:06 pm Pastor Travien Capers officially opens meeting with prayer

Old Business:

1) Minutes by Clerk, Anthony Brown

- *Motion by Gloria Thompson to accept report with any corrections. Seconded and approved.*

New Business:

1) Treasurer Report by Trustee Larry Brown (see handouts):

Tape Ministry	\$5,328.78
Sunday School	\$5,257.54
Business Checking Funds	\$119,816.99
Building Fund	\$241,083.37
Total Church Funds	\$ 371,486.68

- *Motion by Trustee Harry Jones to accept report with any necessary corrections. Seconded and approved.*

2) Budget Report by Ashley Foulks (see handout):

- *Motion by Trustee Jacie Weston to accept report as given with any necessary corrections. Seconded and approved.*

3) Bereavement Policy (See copy of documents):

- Explanation of documents by Pastor Capers
- These documents are not fully comprised at this time. There could be some changes.
- *Motion by Trustee Harry Jones to accept document with any additions. Seconded and approved.*

4) Minister(s) of Music, Presented by Deacon Gregory Brown:

- Looking for a true minister of music
- Brother William Jones is willing to be Assistant Musician if we acquire a Minister of Music. Brother Clarence Sims is not qualified to be Minister of Music. Deacon Ministry has offered the Minister of Music position to Brother William Jones.
- This item was just a presentation to the body for discussion and recommendations.

5) Building Project, Presented by Deacon Gregory Brown (see blueprint as shown):

- Projected cost for additions to pulpit, rear bathrooms, and extension of 30 ft in rear of church will cost \$291,000.
- *Motion by Minister Teresa Wilson to get additional information on this project in order to proceed forward. Seconded and approved.*

6) Election of Officers, Presented by Deacon Gregory Brown:

- *Motion by Deacon Gregory Brown to retain all officers & pastor until next special called meeting, and for voting to be done by written ballot. Seconded and approved.*

Prayer and Adjournment

Zion Benevolent Baptist Church
Semi-Annual Church Meeting
July 15, 2013
(Minutes from Annual Meeting on January 14 & February 10, 2013)
Continuation of January 14 Annual Meeting

Devotion by Deacons

Meeting officially opened by Pastor Capers

1) Restating motion for retaining elected officers

****Motioned and approved by attending members****

2) By-Laws Discussion- Voting/Elections.

(see handouts from Pastor)

a. Should we have written ballots or hand/vocal voting?

b. We are now using By-Laws from 2003 until all new changes are installed.

Prayer and Adjournment

Zion Benevolent Baptist Church
Annual Church Meeting
January 14, 2013 @ 7:00 pm
(Minutes from Semi-Annual Church Meeting on July 16, 2012)

7:02 pm Devotion by Deacons

7:11 pm Meeting opened by Pastor Travien Capers

1) Report from Clerk, Anthony Brown:

- Minutes from last meeting(s)
- *Trustee Harry Jones: Motion to accept report with any corrections. Seconded and approved.*

2) Treasurer Report, Trustee Larry Brown:

- Business Checking acct. balance: \$85,777.78
- Building Fund acct. balance: \$241,008.10
- Total Church Funds: \$326,785.88
- *Deacon Robert Anderson: Motion to accept report. Seconded and approved.*

3) New Church Logo, Presented by Pastor Travien Capers & April Griffin:

- After discussion, Pastor Capers says that everything about logo has not been completely finalized.
- If any member has more questions or any suggestions, Please see Pastor Capers, April Griffin, Deacon Robert Anderson, Trustee Harry Jones, or Anthony Brown.

4) Scholarship Ministry/ Education Ministry:

- This is the 3rd & final reading (see handout)
- Note: There were some changes at 2nd reading. No changes since that time.
- *David Clarkson: Motion to accept these changes for the By-Laws. Seconded and approved.*

5) Church Discipline (2nd Reading):

- See handout from 1st reading
- Note: No additional changes since 1st reading
- If members have any suggestions, please contact By-Law Ministry prior to next (3rd) reading.
- *Deacon Herbert Bell: Motion to accept. Seconded and approved.*

Zion Benevolent Baptist Church
Church Meeting
February 9, 2013
(Minutes from Annual Meeting on January 14, 2013)

6:53 pm Devotion by Deacons

7:06 pm Pastor Travien Capers officially opens meeting with prayer

Old Business:

1) Minutes by Clerk, Anthony Brown

- *Motion by Gloria Thompson to accept report with any corrections. Seconded and approved.*

New Business:

1) Treasurer Report by Trustee Larry Brown (see handouts):

Tape Ministry	\$5,328.78
Sunday School	\$5,257.54
Business Checking Funds	\$119,816.99
Building Fund	\$241,083.37
Total Church Funds	\$ 371,486.68

- *Motion by Trustee Harry Jones to accept report with any necessary corrections. Seconded and approved.*

2) Budget Report by Ashley Foulks (see handout):

- *Motion by Trustee Jacie Weston to accept report as given with any necessary corrections. Seconded and approved.*

3) Bereavement Policy (See copy of documents):

- Explanation of documents by Pastor Capers
- These documents are not fully comprised at this time. There could be some changes.
- *Motion by Trustee Harry Jones to accept document with any additions. Seconded and approved.*

4) Minister(s) of Music, Presented by Deacon Gregory Brown:

- Looking for a true minister of music
- Brother William Jones is willing to be Assistant Musician if we acquire a Minister of Music. Brother Clarence Sims is not qualified to be Minister of Music. Deacon Ministry has offered the Minister of Music position to Brother William Jones.
- This item was just a presentation to the body for discussion and recommendations.

5) Building Project, Presented by Deacon Gregory Brown (see blueprint as shown):

- Projected cost for additions to pulpit, rear bathrooms, and extension of 30 ft in rear of church will cost \$291,000.
- *Motion by Minister Teresa Wilson to get additional information on this project in order to proceed forward. Seconded and approved.*

6) Election of Officers, Presented by Deacon Gregory Brown:

- *Motion by Deacon Gregory Brown to retain all officers & pastor until next special called meeting, and for voting to be done by written ballot. Seconded and approved.*

Prayer and Adjournment

Zion Benevolent Baptist Church
Semi-Annual Church Meeting
July 21, 2014
(Minutes from Annual Church Meeting on January 15, 2014)

6:58 p.m. Devotion by Deacons

7:05 p.m. Pastor Travien Capers addresses the body of attending members with prayer and scripture (Acts 13:36), and officially opens meeting.

1) Minutes from last meeting by Clerk, Anthony Brown

- *Motion to receive minutes by Trustee Harry Jones. Approval of minutes.*

2) 2014 Church Forecast by Pastor Travien Capers

- *(See Screen Presentation)*
- **The Strategic Plan for the Church**
 - a) **Finances:** To work with the Deacons & Finance Ministry regarding the oversight of church finances.
 - b) **Building Project/ Expansion:** Proceeding as proposed with expansion project, also waiting for changes in weather to have ground breaking on project.
 - c) **Youth Ministry:** We need some work to be done with our Youth Ministry. We need members and retired teachers to give input to help the youth and Youth Ministry. We need to teach our youth to know why they are here and the need to be active in the church.
 - d) **Constitution and By-Laws Ministry:** We need to get back to work updating and clarifying our Constitution and By-Laws.
 - e) **Deacons Ministry and all Ministries:** All Ministry leaders and ministry members need to be active within their ministry.
 - f) **Music Ministry:** We are looking for a Minister of Music that can master music and song preparations. Must be able to do more than just play music; must be an asset to the music ministry and to the body.

3) Treasurer Report Building Fund by Trustee Larry Brown

- *(See handout)*
- Tape Ministry..... \$ 5,968.78
- Sunday School..... \$ 6,339.70
- Business Acct..... \$136,014.58
- Building Fund Acct..... \$251,116.60
- *Motion to receive Report by Deacon Herbert Bell. Approval of Report.*

4) Budget Report by Trustee Lever Thompson

- *(See handout)*
- *Motion to receive Report by Helen Brown. Approval of Report.*

5) Church Officers

- *Motion to retain all officers in some position if they are willing to serve by Trustee David Clarkson. Approval of Motion.*

8:10 p.m. Meeting adjourned in song and prayer by Pastor Travien Capers.

Zion Benevolent Baptist Church

Semi-Annual Church Meeting

July 15, 2013

(Minutes from Annual Meeting on January 14 & February 10, 2013)

Continuation of January 14 Annual Meeting

Devotion by Deacons

Meeting officially opened by Pastor Capers

1) Restating motion for retaining elected officers

****Motioned and approved by attending members****

2) By-Laws Discussion- Voting/Elections.

(see handouts from Pastor)

a. Should we have written ballots or hand/vocal voting?

b. We are now using By-Laws from 2003 until all new changes are installed.

Prayer and Adjournment

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
G. Thomas Cooper, Jr., Circuit Court Judge

Case No. 2014-CP-40-6224

Carol Goodson-Eaddy.....Appellant,

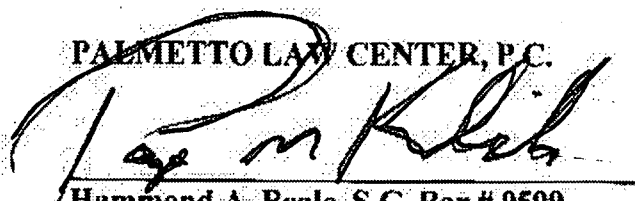
v.

Travien L. Capers, Gregory A. Brown, Robert Davis, Herbert Bell, James Randolph, Jr.,
Harry Thompson, James Brown, Frank M. Jones, Edwin L. Rivers, Sr., Lever Thompson,
Jr., Fred Davis, Harry L. Jones, Sr., David J. Clarkson, Larry B. Brown, Grady Wilson,
and Dorothy B. Adams.....Respondents.

CERTIFICATE OF COUNSEL

The undersigned certifies that this Record on Appeal contains all material proposed to be
included by any of the parties and not any other material.

PALMETTO LAW CENTER, P.C.



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