

STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

Melvina Robinson,

Plaintiff,

vs.

Wal-Mart Stores, Inc.; Wal-Mart  
Neighborhood Market; Wal-Mart Stores  
East, LP; and Wal-Mart Supercenter,

Defendants.

COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT

Civil Action No. 2017-CP-08-1343

AFFIDAVIT OF  
MELVINA ROBINSON  
IN SUPPORT OF MOTION  
FOR NEW TRIAL OR AMENDMENT  
OF JUDGMENT

Melvina Robinson, after being sworn, deposes and states as follows:

1. I am 51 years of age and reside at 110 Gatehouse Drive, Summerville, South Carolina 29486.
2. On February 27, 2019, the day after the trial in this case in favor of the Defendants where the Defendants' witnesses testified that they did not remember me, my children or the incidents we described in our testimony, I visited the Walmart store at 1317 North Main Street, Summerville, South Carolina 29483 to shop.
3. I came upon Melissa Glover, an employee of Walmart at the register who recognized me from previous visits including in 2015 when the incidents occurred. Unlike the Walmart employees that testified at the trial, she remembered clearly that on September 22, 2015, something happened then involving me and that I complained to Gage at the self-checkout counter. Gage and I then went to the Customer Service Counter and spoke with Walmart Manager named "Heather."
4. She further stated to me that there were problems then with the Asset Protection employees at Walmart, and that they no longer worked there.
5. I have a recording of my conversation with Ms. Glover.

\_\_\_\_\_  
Melvina Robinson

Sworn to and subscribed before me  
this \_\_\_\_ day of \_\_\_\_\_, 2019

\_\_\_\_\_  
Notary Public of South Carolina  
My Commission Expires: \_\_\_\_\_

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**SC Court of Appeals**

STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

Melvina Robinson,

Plaintiff,

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Wal-Mart Stores, Inc.; Wal-Mart  
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NINTH JUDICIAL CIRCUIT

Civil Action No. 2017-CP-08-1343

AFFIDAVIT OF  
CLIFFORD T. BROWN, JR.

Clifford T. Brown, Jr., after being sworn, deposes and states as follows:

1. I am 19 years of age and reside with my mother, Melvina Robinson, at 110 Gatehouse Drive, Summerville, South Carolina 29486.
2. I am the son of Melvina Robinson and Clifford T. Brown, Sr.
3. I graduated from Ashley Ridge High School in 2017, where I played football as a linebacker and basketball as a power forward. I am 5'10" tall and weigh 225 lbs.
4. I attended Shaw University in North Carolina for a year after high school, and currently attend Trident Technical College in Charleston, South Carolina. I still play football and basketball.
5. Sometime after the week of July 4, 2015, I was with my mother, Melvina Robinson, at the Walmart located at 1317 N. Main St., Summerville, South Carolina. Walmart workers followed her, and then they stopped her and looked at her basket. The employees did not wear uniforms.

\_\_\_\_\_  
Clifford T. Brown, Jr.

Sworn to and subscribed before me  
this \_\_\_\_ day of \_\_\_\_\_, 2019

\_\_\_\_\_  
Notary Public of South Carolina  
My Commission Expires: \_\_\_\_\_

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1 Q. Okay. So there was no --

2 A. Once they dropped it -- once the judge dropped it, it  
3 was like, okay.

4 Q. All right. Did you have to spend any time in jail?

5 A. Yes. Like maybe a couple hours and my church came and  
6 got me out.

7 Q. Okay. All right. Any other times that you've been  
8 arrested?

9 A. Not ever.

10 Q. In this particular case, Ms. Robinson, my  
11 understanding is that you filed a charge of discrimination with  
12 the Human Affairs Commission in Columbia?

13 A. I did.

14 Q. Okay. And through the Human Affairs Commission's  
15 dealings with your charge, did you ever have a mediation or  
16 anything like that?

17 A. They didn't want one.

18 Q. Who didn't?

19 A. Wal-Mart.

20 Q. Did you -- what happened with your charge of  
21 discrimination?

22 A. What happened to the -- before?

23 Q. No. With the --

24 A. For me to cause it, I mean, to get one?

25 Q. No. After you filed it with Human Affairs, what did

1 Human Affairs do with it?

2 A. They said that there's nothing they can do, that I can  
3 take it -- get a lawyer and go for them through that way.

4 Q. Okay. Did you ever go to Columbia, to the Human  
5 Affairs office --

6 A. Never.

7 Q. -- and meet with anyone there?

8 A. Nobody.

9 Q. Okay. Was that the first time that you had ever  
10 brought a complaint through Human Affairs?

11 A. Yes.

12 Q. Okay.

13 A. Because it was that deep.

14 Q. Uh-huh. Who advised you to pursue something with  
15 Human Affairs?

16 A. Myself.

17 Q. Okay. So you did some research and determined --

18 A. Yes.

19 Q. All right. Did you file complaints -- other than this  
20 lawsuit did you complain about this Wal-Mart treatment with any  
21 other person or state agency or any governmental body?

22 A. No.

23 Q. Okay. So just the present lawsuit that we're here  
24 about today, and then the Human Affairs complaint that you made?

25 A. Right.

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SC Court of Appeals

1 Q. Okay. And what I hear you saying is that Human  
2 Affairs got back with you at some point and said they weren't  
3 going to do anything with it, is that pretty --

4 A. Because they said -- they told me that if they're  
5 unwilling to, I guess, be legible or eligible for their wrong,  
6 that if they're not agreeing to it, it's nothing they can do.  
7 They can't make -- yeah.

8 MR. POPOWSKI: You should finish your  
9 sentence. Don't let her talk over you.

10 A. Yes. It's nothing that they can do. That I can go and  
11 take them to court, yes.

12 Q. Do you remember the names of anyone you spoke with at  
13 Human Affairs?

14 A. No. I have it on my phone.

15 Q. Okay. Do you have your phone with you?

16 A. Yes.

17 Q. Okay. If you could take a look and let me know, that  
18 would be helpful. Let's just take a break.

19 (Whereupon, a short recess  
20 was taken.)

21 A. Ellis Margaret.

22 Q. Okay.

23 A. And Henley Ellis. I guess that's the same person.  
24 Margaret Henley Ellis.

25 Q. Okay.

1 A. Yes.

2 Q. At the Human Affairs Commission?

3 A. Yes.

4 Q. Do you have a number for them?

5 A. Human -- for South Carolina Human Affairs Commission,  
6 803-737-7782.

7 Q. All right, thank you. Have you worked outside the  
8 home in a job for pay in the last ten years?

9 A. Yeah.

10 Q. Okay.

11 A. Well, not really. I've had like summer jobs where I  
12 was going to bring in my criminal justice field so I can learn  
13 how to work around kids.

14 Q. Okay.

15 A. So it was at my home. So three years for that.

16 Q. You worked out of your home?

17 A. No, it was -- yeah, it was out of my home but in my  
18 home. It was like I set-up camp, summer camp.

19 Q. Okay.

20 A. For three months. Like for three years, but for three  
21 months, summer months.

22 Q. Okay, while the kids were out of school?

23 A. Right.

24 Q. All right. You ran a camp?

25 A. Yes.

1 Q. What did you call it?

2 A. It was -- I just called it -- I can't remember the  
3 name I called it, but it was a camp for the youth in the  
4 neighborhood.

5 Q. Okay. And did you have to be like certified or  
6 licensed through DHEC or any state agency to run a camp?

7 A. No.

8 Q. Okay. So it's not like a daycare?

9 A. It was through the -- no, it was through the summer  
10 program, through like the free lunch program.

11 Q. Uh-huh.

12 A. That came into my -- I used it at my house.

13 Q. When do you think was the last time you've done that  
14 with now being 2018?

15 A. I did it like two years ago. About two or three years  
16 ago.

17 Q. Okay. And did you do it three summers in a row?

18 A. Right.

19 Q. All right. And then you just stopped doing that?

20 A. Right.

21 Q. How many campers would you have?

22 A. About 60 or 70 kids.

23 Q. Okay. And was that something where you would get paid  
24 for doing that?

25 A. I mean, when I got paid, it went back into getting the

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Melvin Robinson  
160 Gatehouse Dr  
Summerville SC 29486

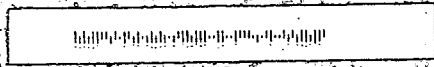


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