

AFFIDAVIT OF JAMES HACKNEY

Appeared before me, James Hackney, who, having been duly sworn, did state the following to me:

I, James Hackney, of 6813 Capri Place, Bethesda, Maryland 20817 and to the best of my personal knowledge, information and belief provide as follows:

1. I am over 18 years old and not suffering from any disability that would render me incompetent to offer the following testimony.
2. In August 2018, I began seeking counsel to represent Ms. Stephanie Schoumacher in litigation before the Court of Common Pleas in the County of Beaufort, South Carolina.
3. On the recommendation of a college classmate and partner in the Washington office of Nelson Mullins, I contacted Mr. Andrew Connor, an associate in the Charleston office of Nelson Mullins.
4. After reviewing the file, Mr. Connor agreed to represent Ms. Schoumacher and informed me that the fees would be in the neighborhood of \$50,000.
5. Mr. Connor and I reached an agreement where I would be responsible for paying the fees on behalf of Ms. Schoumacher. (See attached emails)
6. Since October 2018, Nelson Mullins has mailed all invoices to me at my home address, 6813 Capri Place, Bethesda, Maryland 20817
7. A trial was held on March 18, 2019 before Judge Dukes, a Master in Equity.
8. At the time of the trial, the fees billed by the Nelson Mullins team were approximately \$60,000
9. A decision was rendered by Judge Dukes in September 2019
10. Following Judge Dukes decision, Mr Connor discussed with Ms. Schoumacher and me the possibility of filing an appeal on one single issue.
11. Mr. Connor assured Ms. Schoumacher and me that the fees for the appeal would not be substantial, owing to the fact that the brief had essentially already been written and that most of the additional work would be handled by summer associates and/or junior associates at the firm.
12. An appeal on behalf of Ms. Schoumacher was filed in December 2019.
13. Subsequent to the trial before Judge Dukes, an additional amount of fees totaling approximately \$165,000 has been billed by Nelson Mullins.
14. The total fees billed by Mr. Connor and Nelson Mullins since September 2018 are now approximately \$225,000.
15. Since payment of the fees are my responsibility, as agreed in September 2018, I have discussed on numerous occasions with Mr. Connor and Mr. John Kobos, also of Nelson Mullins, the enormity of the fees billed and the possibility of some kind of significant discount.
16. I have recently learned that Mr. Connor is leaving Nelson Mullins as of January 31, 2022.
17. It is my intention to continue the discussions with Mr. Kobos in order to reach a settlement regarding the fees.

Further affiant sayeth naught.

Sworn before me this 27th day of January 2022 by: James Hackney (James Hackney)

Notary:



[Signature]

Stephanie M, Schoumacher
1353 Iris Street, N.W.
Washington, D.C. 20012
Case No. 2019-002079

RECEIVED
FEB 22 2022
SC Court of Appeals

South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, South Carolina 29201.

February 14, 2022

Dear Clerk of Court:

On January 14, 2020 my attorney, Andrew Connor, filed a motion to withdraw from my case for failure to "„,fulfill an obligation to the lawyer regarding the lawyer's services or payment...".

Attached is a copy of a signed, notarized affidavit from James Hackney stating that he retained Mr. Connor, of Nelson Mullins at that time, to replace the firm I had hired. All invoices were sent to Mr. Hackney as he was, solely, responsible for the fees charged by Mr. Connor. Mr. Connor can attest to these facts.

I am sending this information pursuant to Mr. Connor's motion to withdraw from my case, with the hope that it, like the motion, will become a part of my case record.

Sincerely,



Stephanie Schoumacher

Schoumachee
1353 Iris St, N.W.
Washington, DC 20012

CAPITAL DISTRICT 208

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Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, S.C. 29211
(Case No. 2019-002079)

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