

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
 Alexis Berg,)
)
 Plaintiff,)
)
 vs.)
)
 Patrick Bryant, John Osborne, Eric)
 Bowman, Pommer Group, LLC,)
 Assignment Desk Works, LLC and)
 GLT2, LLC,)
)
 Defendants.)

Patrick Bryant,)
)
 Third-Party Plaintiff,)
)
 vs.)
)
 Nancy Ruth Mace, Melissa Britton,)
 and Alexis Berg,)
)
 Third Party Defendants.)
 _____)

IN THE COURT OF COMMON PLEAS
 FOR THE NINTH JUDICIAL CIRCUIT
 C/A NO.: 2025-CP-10-03124

**)THIRD-PARTY DEFENDANT NANCY
)MACE’S ANSWER TO THIRD- PARTY
)PLAINTIFF PATRICK BRYANT’S THIRD
)PARTY COMPLAINT**

THIRD PARTY DEFENDANT, NANCY RUTH MACE, BY AND THROUGH
 COUNSEL ANSWERS THIRD PARTY DEFENDANT PLAINTIFF'S
 AMENDED THIRD PARTY COMPLAINT AS FOLLOWS:

FACTS COMMON TO ALL COUNTS

1. Each and every paragraph of Third-Party Plaintiff’s Amended Third-Party Complaint not specifically admitted, qualified or explained is hereby denied.
2. Responding to Paragraph 1, Mace denies the characterization that she made claims "without any proof." Mace admits that she has made statements regarding events that

occurred on or about October 26, 2018, based on materials she discovered on Bryant's phone, which she accessed with his express permission.

3. Responding to Paragraph 2, Mace denies this paragraph in its entirety. Mace did not conspire with anyone to fabricate any assault. Mace discovered materials on Bryant's phone—which she accessed with his express permission—and subsequently reported what she discovered to law enforcement.
4. Responding to Paragraph 3, Mace admits that she communicated with Berg regarding materials she discovered on Bryant's phone, including telling Berg she had seen a video from Bryant's phone. Mace admits that Berg instituted the present suit on or about June 10, 2025. Mace denies that her allegations are false. Mace accessed Bryant's phone with his express permission and reported what she discovered.
5. Responding to Paragraph 4, Mace denies this paragraph in its entirety. Mace did not concoct a false narrative, did not blackmail Bryant, and did not act to ruin Bryant for personal gain. Mace discovered materials on Bryant's phone—which she accessed with his express permission—and reported what she discovered to law enforcement.
6. Responding to Paragraph 5, Mace denies that Berg is a pawn in any scheme. Mace denies that no assault took place; Mace viewed a video on Bryant's phone depicting an unconscious woman being sexually assaulted. Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations concerning Britton's motives or Berg's fault and therefore denies the same.
7. Responding to Paragraph 6, Mace denies this paragraph. This paragraph states a legal conclusion to which no response is required. To the extent a response is required, Mace denies that her actions were solely personal or for personal gain and denies that she is judicially estopped from seeking certification that her alleged actions were within the

scope of her employment as a United States Congresswoman pursuant to the Westfall Act, 28 U.S.C. §2679.

8. Responding to Paragraph 7, Mace denies this paragraph in its entirety. Mace denies that Bryant is a victim. Mace denies that she falsely branded Bryant a rapist and voyeur; Mace viewed multiple videos and photographs on Bryant's phone depicting what appeared to be unconscious women being sexually assaulted. Mace denies weaponizing falsehoods, fabricating criminal allegations, or abusing private relationships. The remainder of this paragraph consists of argument and rhetoric to which no response is required. To the extent a response is required, it is denied.
9. Responding to Paragraph 8, Mace admits that Bryant is a resident of Charleston County, South Carolina and that Bryant is the founder of Harbor Freight Entrepreneur, a past Chairman of the Charleston Chamber of Commerce, upon information and belief. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph and therefore denies the same.
10. Responding to Paragraph 9, Mace denies that she is a resident of Charleston County, South Carolina. Mace is a resident of Berkeley County South Carolina. Mace admits that she has been sued in her personal capacity in this action but reserves all defenses, including but not limited to certification that her alleged actions were within the scope of her employment as a United States Congresswoman pursuant to the Westfall Act, 28 U.S.C. §2679, any defenses available under the Federal Tort Claims Act, and that her actions are protected by the Speech or Debate Clause, U.S. Const. art. I, §6, cl. 1.
11. Responding to Paragraph 10, Mace admits that Defendant Britton is a resident of Charleston County, upon information and belief.
12. Responding to Paragraph 11, Mace admits that Defendant Berg is a former resident of Charleston County, now residing in Minnesota, upon information and belief.

13. Responding to Paragraph 12, Mace admits that venue is proper in Charleston County, South Carolina pursuant to S.C. Code Ann. § 15-7-30. Mace denies that all acts alleged herein occurred within Charleston County, as certain of Mace's alleged conduct occurred elsewhere, including in Washington, D.C. in connection with her duties as a United States Congresswoman.
14. Responding to Paragraph 13, this paragraph pertains to Defendant Berg and does not require a response from Mace. To the extent a response is required, this paragraph contains legal conclusions to which no response is required. To the extent factual allegations are contained herein, Mace lacks sufficient knowledge or information to form a belief as to the truth of such allegations and therefore denies the same.
15. Responding to Paragraph 14, this paragraph contains legal conclusions to which no response is required. To the extent factual allegations are contained herein, Mace denies that she wrongfully converted Bryant's phone and data, denies that she manipulated data, denies that she blackmailed Bryant, and denies that she conspired with Britton to fabricate an alleged assault. Mace accessed Bryant's phone with his express permission after Bryant added her thumbprint to his phone and told her she could access it whenever she wanted. Mace reported what she discovered to law enforcement.
16. Responding to Paragraph 15, Mace admits this paragraph.
17. Responding to Paragraph 16, Mace admits this paragraph.
18. Responding to Paragraph 17, Mace denies that she became "paranoid." Mace admits that in the summer and fall of 2023, she had concerns that Bryant was being unfaithful during their relationship, based on her discovery of HIV-related medication in his possession, based on the fact that Bryant was on a dating app and other behavior.
19. Responding to Paragraph 18, Mace admits that the parties experienced strain and conflict in their relationship but denies that this strain arose merely from "suspicions." The

significant strain and conflict in the relationship arose after Mace discovered Bryant's HIV-related medication, after Bryant physically assaulted her multiple times, after the discovery Bryant was on a dating app, and after Mace accessed Bryant's phone with his express permission and discovered inappropriate, illicit and illegal photographs and videos and potential Child Sexual Abuse Material (CSAM).

20. Responding to Paragraph 19, Mace admits that the deterioration of the parties' relationship gave rise to disputes. Mace denies that the "events" forming the basis of this action are accurately characterized by Bryant elsewhere in the Third-Party Complaint.
21. Responding to Paragraph 20, Mace denies that her suspicions were "unfounded," as Bryant was on a dating app during their relationship. Mace admits that in the fall of 2023 she sought access to Bryant's phone. Bryant thereafter gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted.
22. Responding to Paragraph 21, Mace denies that Bryant refused to provide her access to his phone. Mace denies that Bryant declined to provide his passcode, fingerprint, or any other means of access to the phone. To the contrary, Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted. Bryant also provided Mace with a four-digit code for his safe, which Bryant chose to use for hidden folders on his phone. Mace admits that she placed an air tag on Bryant's car for one day in August 2023. Mace admits that she attempted to access Bryant's laptop, but this occurred after she discovered videos and photographs on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted after she discovered she and other women, including some of his female employees and wives of some of his male employees, and other women were filmed on a hidden camera without their knowledge, permission or consent.

23. Responding to Paragraph 22, Mace admits that she communicated with Eric Bowman on occasion, but rarely, during the summer or fall of 2023. Upon information and belief, Mace admits that Bowman is a Charleston County resident and a business associate of Bryant. The remaining allegations of said paragraph are denied.
24. Responding to Paragraph 23, Mace denies that she asked Bowman if he knew anyone who could "hack into" Bryant's phone. Mace admits that in August 2023 she asked Bowman about hiring a private investigator. Mace admits that she later told Bowman she no longer needed one or had taken care of it. Mace denies knowledge of changing message settings on her communications with Bowman to automatically delete after one day. Mace lacks sufficient knowledge or information as to whether such settings were ever enabled or by whom. The remaining allegations of said paragraph are denied.
25. Responding to Paragraph 24, Mace admits that she inquired about hiring a private investigator. Mace denies the remaining allegations of said paragraph.
26. Responding to Paragraph 25, Mace admits that she and Bryant were engaged to be married and living together during the time period referenced herein. The remaining allegations of said paragraph are denied.
27. Responding to Paragraph 26, Mace admits that on or about the morning of November 13, 2023, she accessed Bryant's phone while he was asleep. Mace denies that this was "without his permission." Bryant had given Mace express permission to access his phone, he added her thumbprint to his phone, and told her she could access it whenever she wanted. Bryant's phone, however, was on his nightstand when he awoke and not in Mace's possession.
28. Responding to Paragraph 27, Mace denies that Bryant had to "retrieve" his phone from her on the morning of November 13, 2023, because the phone was on his nightstand when he awoke. Mace denies that she "hacked" the phone. Mace accessed hidden folders

on Bryant's phone using a four-digit code that Bryant had provided to her for his safe; Bryant chose to use the same code for both his safe and the hidden folder on his phone. Mace lacks sufficient knowledge or information to form a belief as to what Bryant discovered upon reviewing his phone or when he became concerned and therefore denies those allegations. Mace denies that she downloaded an application called "Mr. Fone" on the morning of November 13, 2023.

29. Responding to Paragraph 28, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
30. Responding to Paragraph 29, Mace denies the allegations of this paragraph.
31. Responding to Paragraph 30, Mace admits that data from Bryant's phone was transferred to another device. Mace denies that this was done "without consent" or that it violated Bryant's privacy rights. Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted. Mace subsequently provided this data to law enforcement.

MACE'S ATTEMPTS TO BLACKMAIL BRYANT

32. Responding to Paragraph 31, Mace denies meeting with Wesley Donehue on or about November 7-9, 2023.
33. Responding to Paragraph 32, Mace denies that she told Donehue she had "hacked" Bryant's devices. Mace accessed Bryant's phone with his express permission after Bryant added her thumbprint to his phone and told her she could access it whenever she wanted. Mace admits that she told Donehue that Bryant had filmed women without their consent. Mace denies stating that she would use the information to "get her houses."
34. Responding to Paragraph 33, Mace denies this paragraph.

35. Responding to Paragraph 34, Mace denies that Donehue urged her to report what she found on Bryant's phone to the authorities. Mace denies that she refused to report it. Mace denies stating "I'm going to use this information to get my houses." Mace reported what she discovered directly to law enforcement.
36. Responding to Paragraph 35, Mace admits that she told Donehue she felt unsafe around Bryant but not during a November 2023 meeting. Mace admits that she traveled to the Caribbean with Bryant. Mace denies stating she was going to get a 'free Caribbean vacation.' Mace admits that while on the trip she intended to continue reviewing Bryant's phone, which she had express permission to access.
37. Responding to Paragraph 36, Mace denies meeting with Donehue in November 2023. Mace denies that this characterization is accurate or complete. Mace is not required to have disclosed her future legislative intentions during a private conversation with a political consultant. The remaining allegations of said paragraph are denied.
38. Responding to Paragraph 37, Mace denies this paragraph.
39. Responding to Paragraph 38, Mace admits that on November 13, 2023, a preservation letter was sent to Bryant from her attorneys. Mace admits that the letter addressed preservation of evidence and referenced potential violations of South Carolina's voyeurism statute. The letter speaks for itself, and Mace denies any characterization inconsistent with its contents.
40. Responding to Paragraph 39, Mace admits that she communicated with Bowman on or about November 30, 2023, regarding a constituent-related request. The remaining allegations of said paragraph are denied.
41. Responding to Paragraph 40, Mace admits that she communicated with Bryant in November 2023. To the extent Bryant possesses Verizon records or screenshots, those

documents speak for themselves. The remaining allegations of said paragraph are denied.

42. Responding to Paragraph 41, Mace objects to this paragraph on the grounds that it seeks to disclose confidential mediation communications in violation of Rule 8 of the South Carolina Alternative Dispute Resolution Rules. Subject to and without waiving this objection, Mace admits that she and Bryant participated in pre-suit mediation on January 8, 2024, regarding the Properties. Mace denies the remaining allegations in this paragraph.

THE OCTOBER 2018 POOL INCIDENT AT BRITTON'S RESIDENCE

43. Responding to Paragraph 42, Mace was not present at the alleged gathering. Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
44. Responding to Paragraph 43, Mace was not present at the alleged incident. Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
45. Responding to Paragraph 44, this paragraph pertains to Defendant Britton's alleged conduct, not Mace. Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
46. Responding to Paragraph 45, Mace disputes Bryant's denial of any alleged assault or wrongdoing; Mace viewed multiple videos and photographs on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted. The remaining allegations in this paragraph pertain to Defendant Britton's alleged conduct. Mace was not present at the alleged gathering and lacks sufficient knowledge or information to

form a belief as to the truth of the allegations regarding Britton's conduct and therefore denies the same.

47. Responding to Paragraph 46, this paragraph pertains to Defendant Britton's alleged conduct, not Mace. Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
48. Responding to Paragraph 47, Mace admits she was in contact with Britton in early 2024. Mace denies that any conspiracy was formed or that there was any coordinated effort to harm Bryant. The remaining allegations in this paragraph pertain to Britton's conduct. Mace lacks sufficient knowledge or information to form a belief as to the truth of those allegations and therefore denies the same.
49. Responding to Paragraph 48, upon information and belief, Mace admits she met with Britton in early 2024. Mace denies that no video exists; Mace viewed multiple photos and videos on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted. Mace denies any conspiracy to frame or defraud Bryant, Bowman, or Osborne. The remaining allegations of said paragraph are denied.

MACE CONTACTS BERG

50. Responding to Paragraph 49, Mace denies that any conspiracy existed or that Berg was targeted. Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations regarding Berg's employment history or personal characteristics and therefore denies the same.
51. Responding to Paragraph 50, Mace admits that on or about April 6, 2024, she called Berg. Mace admits that during this call she told Berg she had seen a video on Bryant's phone depicting Berg unconscious. Mace denies that she used the term 'gang rape' or 'gang raped.' Mace admits that she identified the location as Eric Bowman's home and

identified the men she believed were involved: Bryant, Bowman and John Osborne. Mace denies any characterization that her statements were false.

52. Responding to Paragraph 51, Mace admits that Berg conveyed to Mace that she had no independent memory of the alleged events because she was unconscious. The remaining allegations of said paragraph are denied.
53. Responding to Paragraph 52, Mace denies that she gave varying versions of events. Mace admits that she provided information to law enforcement and that she possessed materials. Mace denies that she urged Berg to undergo medical testing. Mace admits that Berg stated during this call that she had no memory of any assault and expressed disbelief. The remaining allegations of said paragraph are denied.

DEFAMATORY STATEMENTS BY BERG

54. Responding to Paragraph 53, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
55. Responding to Paragraph 54, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
56. Responding to Paragraph 55, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
57. Responding to Paragraph 56, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
58. Responding to Paragraph 57, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
59. Responding to Paragraph 58, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.

60. Responding to Paragraph 59, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
61. Responding to Paragraph 60, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
62. Responding to Paragraph 61, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
63. Responding to Paragraph 62, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
64. Responding to Paragraph 63, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.

TORTIOUS INTERFERENCE BY BERG

65. Responding to Paragraph 64, upon information and belief, Mace admits that Berg previously worked for ADW. Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations regarding Berg's specific position and therefore denies the same.
66. Responding to Paragraph 65, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
67. Responding to Paragraph 66, Mace denies the allegations in this paragraph.
68. Responding to Paragraph 67, Mace denies the allegations in this paragraph.
69. Responding to Paragraph 68, Mace denies the allegations in this paragraph.

COUNTER-CLAIM AGAINST BERG

70. Responding to Paragraph 69, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.

71. Responding to Paragraph 70, upon information and belief, Mace admits that venue is proper in Charleston County.
72. Responding to Paragraph 71, upon information and belief, Mace admits that this Court has subject matter jurisdiction over this matter.

COUNT I – DEFAMATION (Berg)

73. Responding to Paragraph 72, Mace incorporates by reference her responses to the preceding paragraphs as if fully set forth herein.
74. Responding to Paragraph 73, Mace denies that her claims regarding Bryant were false or defamatory. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph regarding Berg's statements and therefore denies the same.
75. Responding to Paragraph 74, the court filings referenced herein speak for themselves. Mace denies that the allegations contained therein were false. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph and therefore denies the same.
76. Responding to Paragraph 75, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, this paragraph states legal conclusions to which no response is required. Statements made in pleadings are absolutely privileged under South Carolina law and cannot form the basis for a defamation claim. To the extent factual allegations are contained herein, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations regarding Berg's court filings and therefore denies the same.
77. Responding to Paragraph 76, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, this paragraph states legal conclusions to which no response is required. Statements made in pleadings are absolutely privileged under

South Carolina law and cannot form the basis for a defamation claim. To the extent factual allegations are contained herein, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations regarding Berg's court filings and therefore denies the same.

78. Responding to Paragraph 77, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, this paragraph states a legal conclusion to which no response is required.
79. Responding to Paragraph 78, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, Mace lacks sufficient knowledge or information to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
80. Responding to Paragraph 79, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, this paragraph states a legal conclusion to which no response is required.
81. Responding to Paragraph 80, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, Mace denies that Berg's statements were false. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph and therefore denies the same.
82. Responding to Paragraph 81, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, Mace denies that Bryant is entitled to any damages. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph and therefore denies the same.
83. Responding to Paragraph 82, Mace denies that any conspiracy existed or that she devised any plan to convince ADW employees to turn on Bryant or leave the company. Mace

denies that Berg's action is frivolous and denies that there is no proof of any alleged assault.

COUNT II – TORTIOUS INTERFERENCE (Berg)

84. Responding to Paragraph 83, Mace incorporates by reference her responses to the preceding paragraphs as if fully set forth herein.
85. Responding to Paragraph 84, Mace denies the allegations in this paragraph.
86. Responding to Paragraph 85, Mace denies the allegations in this paragraph.
87. Responding to Paragraph 86, Mace denies the allegations in this paragraph.
88. Responding to Paragraph 87, this paragraph is directed at Berg, not Mace. To the extent a response is required from Mace, this paragraph states a legal conclusion to which no response is required.
89. Responding to Paragraph 88, Mace denies the allegations in this paragraph.
90. Responding to Paragraph 89, Mace denies the allegations in this paragraph.

COUNT III – CIVIL CONSPIRACY (Berg)

91. Responding to Paragraph 90, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.
92. Responding to Paragraph 91, Mace denies the allegations in this paragraph.
93. Responding to Paragraph 92, Mace denies the allegations in this paragraph.
94. Responding to Paragraph 93, Mace denies that any conspiracy existed. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph regarding Berg's communications and therefore denies the same.
95. Responding to Paragraph 94, Mace denies the allegations in this paragraph.

BRYANT'S THIRD-PARTY CLAIMS AGAINST MACE AND BRITTON

96. Responding to Paragraph 95, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.
97. Responding to Paragraph 96, upon information and belief, Mace admits that venue is proper in Charleston County.
98. Responding to Paragraph 97, upon information and belief, Mace admits that this Court has subject matter jurisdiction over this matter.

COUNT I – DEFAMATION (Mace)

99. Responding to Paragraph 98, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.
100. Responding to Paragraph 99, Mace admits she made statements to Donehue regarding Bryant. Mace denies that those statements were false or defamatory.
101. Responding to Paragraph 100, this paragraph states legal conclusions to which no response is required. To the extent factual allegations are contained herein, Mace denies them.
102. Responding to Paragraph 101, this paragraph states legal conclusions to which no response is required. To the extent factual allegations are contained herein, Mace denies that her statements were false or made with reckless disregard for the truth.
103. Responding to Paragraph 102, the characterization of whether Mace's statements were made outside the scope of her employment states a legal conclusion to which no response is required. Mace denies that her statements were outside the scope of her duties as a United States Congresswoman. The timing and subject matter of legislation introduced by Mace is a matter of public record. Mace denies that she had not reported to law enforcement. Mace reported Bryant's conduct to the South Carolina Law Enforcement Division, which opened an investigation on or about December 14, 2023.

104. Responding to Paragraph 103, Mace denies the allegations in this paragraph.
105. Responding to Paragraph 104, Mace denies that her statements were false or defamatory. Mace denies that Bryant is entitled to any damages. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph and therefore denies the same.

COUNT II – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (Mace)

106. Responding to Paragraph 105, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.
107. Responding to Paragraph 106, Mace admits that she accessed Bryant's phone and obtained photographs and other data. Mace denies that she did so "without authorization." Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted.
108. Responding to Paragraph 107, Mace denies the allegations in this paragraph. Mace had express authorization to access Bryant's phone.
109. Responding to Paragraph 108, Mace denies the allegations in this paragraph. Mace did not improperly obtain any information. The information Mace discovered on Bryant's phone was not innocuous; it depicted what appeared to be an unconscious woman being sexually assaulted and other women photographed or filmed without their knowledge or consent. Mace denies that she threatened Bryant or conditioned any disclosure on transfer of ownership of the Properties.
110. Responding to Paragraph 109, Mace denies this paragraph. Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted. Mace's conduct was not intentional, reckless, or carried out with knowledge or substantial certainty that it would cause Bryant severe

emotional distress. Mace discovered materials on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted and reported what she discovered directly to law enforcement.

111. Responding to Paragraph 110, Mace denies the allegations in this paragraph.
112. Responding to Paragraph 111, Mace denies the allegations in this paragraph. Mace denies that Bryant is entitled to any damages.
113. Responding to Paragraph 112, Mace denies this paragraph. The characterization of whether Mace's actions related to her position as a United States Congresswoman states a legal conclusion to which no response is required. Mace denies that her motivation was to coerce Bryant into relinquishing ownership of the Properties. Mace discovered materials on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted, other material that constituted voyeurism and possible CSAM, and reported what she discovered to law enforcement.

COUNT III – CONVERSION (Mace)

114. Responding to Paragraph 113, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.
115. Responding to Paragraph 114, Mace admits that Bryant had a legal right to ownership of his phone. Mace denies that Bryant denied each and every request by Mace to access and/or possess his phone. To the contrary, Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted.
116. Responding to Paragraph 115, Mace denies the allegations in this paragraph. Mace had express permission to access Bryant's phone and did not wrongfully convert or retain it.

117. Responding to Paragraph 116, Mace denies the allegations in this paragraph. Mace had express permission to access Bryant's phone. To the extent this paragraph references a spoliation charge, this states a legal conclusion to which no response is required.
118. Responding to Paragraph 117, Mace denies the allegations in this paragraph.
119. Responding to Paragraph 118, Mace denies this paragraph. The characterization of whether Mace's actions related to her position as a United States Congresswoman states a legal conclusion to which no response is required. Mace denies that her motivation was to coerce Bryant into relinquishing ownership of the Properties. Mace discovered materials on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted, other materials that constituted voyeurism and possible CSAM, and reported what she discovered to law enforcement.

COUNT IV – INVASION OF PRIVACY (Mace)

120. Responding to Paragraph 119, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.
121. Responding to Paragraph 120, Mace denies this paragraph. Bryant did not have a reasonable expectation of privacy as to Mace, given that Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted.
122. Responding to Paragraph 121, Mace admits that she accessed Bryant's phone and obtained photographs and information. Mace denies that she did so "without Bryant's knowledge or consent." Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted.
123. Responding to Paragraph 122, Mace denies the allegations in this paragraph.

124. Responding to Paragraph 123, Mace admits she shared limited information regarding what she discovered on Bryant's phone with Donehue in order to enlist his help to inform a potential victim whom Mace believes was photographed and/or filmed without her knowledge or consent. To the extent this paragraph alleges Mace was required to obtain Bryant's consent to share such information, this states a legal conclusion to which no response is required. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations and therefore denies the same.
125. Responding to Paragraph 124, Mace denies the allegations in this paragraph.
126. Responding to Paragraph 125, Mace denies the allegations in this paragraph.
127. Responding to Paragraph 126, Mace denies the allegations of this paragraph.
128. Responding to Paragraph 127, Mace denies this paragraph. The characterization of whether Mace's actions related to her position as a United States Congresswoman states a legal conclusion to which no response is required. Mace denies that her sole motivation was to coerce Bryant into relinquishing ownership of the Properties. Mace discovered materials on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted, other materials that constituted voyeurism and possible CSAM, and reported what she discovered to law enforcement.

COUNT V – CIVIL CONSPIRACY (Mace and Britton)

129. Responding to Paragraph 128, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.
130. Responding to Paragraph 129, Mace denies the allegations in this paragraph.
131. Responding to Paragraph 130, Mace admits that in November 2023 she was in a personal relationship with Bryant. Mace denies that she unlawfully accessed Bryant's phone or devices. Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted. Mace

admits she obtained information from Bryant's phone. Mace denies that she sought to use any images as leverage to obtain ownership of the Properties. The timing of Mace's report to law enforcement and any contemplation of legislation are addressed elsewhere. Mace discovered materials on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted, and other materials that constituted voyeurism and possible CSAM, and reported what she discovered directly to law enforcement.

132. Responding to Paragraph 131, Mace denies the allegations in this paragraph.
133. Responding to Paragraph 132, Mace denies that any conspiracy existed. Mace denies that her actions were motivated by personal retaliation or financial gain. The characterization of whether Mace's actions related to any legislative or governmental purpose states a legal conclusion to which no response is required. Mace reported what she discovered on Bryant's phone directly to law enforcement. The timing of that report was affected by factors unrelated to any alleged improper motive.
134. Responding to Paragraph 133, Mace denies the allegations in this paragraph.
135. Responding to Paragraph 134, Mace denies the allegations in this paragraph.
136. Responding to Paragraph 135, Mace denies the allegations in this paragraph.
137. Responding to Paragraph 136, Mace denies that any conspiracy existed or that she devised any plan to convince ADW employees to turn on Bryant or leave the company. Mace denies that Berg's action is frivolous and denies that there is no proof of any alleged assault.
138. Responding to Paragraph 137, Mace denies that any conspiracy existed. Mace lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in this paragraph regarding Berg's communications and therefore denies the same.

139. Responding to Paragraph 138, Mace denies the allegations in this paragraph.

COUNT VI – AIDING AND ABETTING CRIMINAL CONDUCT (Britton)

140. Responding to Paragraph 139, Mace incorporates by reference her responses to all preceding paragraphs as if fully set forth herein.

141. Responding to Paragraphs 140 – 145, said paragraphs are directed at Defendant Britton, not Mace. To the extent any response is required from Mace, Mace lacks sufficient knowledge or information to form a belief as to the truth of said allegations in these paragraphs regarding Britton's alleged conduct and therefore denies them.

FOR A FIRST AFFIRMATIVE DEFENSE

142. Bryant's Amended Third-Party Complaint fails to state facts sufficient to constitute a cause of action against Mace upon which relief can be granted and therefore should be dismissed pursuant to Rule 12(b)(6), SCRCF.

FOR A SECOND AFFIRMATIVE DEFENSE

143. Mace's statements regarding Bryant were true. Mace viewed multiple videos and photographs on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted, other materials that constituted voyeurism and possible CSAM. Mace reported what she discovered directly to law enforcement. Truth is an absolute defense to defamation.

FOR A THIRD AFFIRMATIVE DEFENSE

144. To the extent Bryant's defamation claims are based on statements made in judicial pleadings or filings, such statements are absolutely privileged under South Carolina law and cannot form the basis for a defamation claim.

FOR A FOURTH AFFIRMATIVE DEFENSE

145. Mace's statements to law enforcement and to others with a legitimate interest in the subject matter were made in good faith and are protected by qualified privilege under South Carolina law.

FOR A FIFTH AFFIRMATIVE DEFENSE

146. Bryant's claims for conversion, invasion of privacy, and related torts fail because Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted. Mace's access to Bryant's phone was authorized and consensual.

FOR A SIXTH AFFIRMATIVE DEFENSE

147. Bryant's claim for intentional infliction of emotional distress fails because Mace's conduct does not rise to the level of extreme and outrageous conduct required to sustain such a claim under South Carolina law.

FOR A SEVENTH AFFIRMATIVE DEFENSE

148. Bryant's civil conspiracy claims fail because no conspiracy existed between Mace and any other party. Mace did not enter into any agreement to commit an unlawful act or to accomplish a lawful act by unlawful means.

FOR AN EIGHTH AFFIRMATIVE DEFENSE

149. To the extent Mace's actions relate to her legislative functions as a United States Congresswoman, including but not limited to her work on legislation addressing voyeurism and sexual assault, such actions are protected by the Speech or Debate Clause of the United States Constitution, U.S. Const. art. I, § 6, cl. 1.

FOR A NINTH AFFIRMATIVE DEFENSE

150. Bryant's claims are barred by the doctrine of unclean hands. Bryant's own alleged conduct, including the recording of women without their consent, precludes him from

seeking equitable relief or damages arising from Mace's discovery and reporting of that conduct.

FOR A TENTH AFFIRMATIVE DEFENSE

151. Bryant failed to take reasonable steps to mitigate his alleged damages, and any recovery should be reduced accordingly.

FOR AN ELEVENTH AFFIRMATIVE DEFENSE

152. Bryant's claims are barred to the extent they seek to impose liability for Mace's speech on matters of public concern, which is protected by the First Amendment to the United States Constitution.

FOR A TWELFTH AFFIRMATIVE DEFENSE

153. Mace acted in good faith in discovering and reporting what appeared to be criminal activity depicted on Bryant's phone. Mace's actions in reporting suspected criminal conduct to law enforcement are protected under South Carolina law and public policy.

FOR A THIRTEENTH AFFIRMATIVE DEFENSE

154. To the extent Bryant is a public figure or limited purpose public figure, his defamation claims fail because Mace did not act with actual malice. Mace did not make any statements with knowledge of their falsity or with reckless disregard for the truth.

FOR A FOURTEENTH AFFIRMATIVE DEFENSE

155. To the extent applicable, Bryant's own conduct contributed to any alleged damages he claims to have suffered, and any recovery should be reduced or barred accordingly.

FOR A FIFTEENTH AFFIRMATIVE DEFENSE

156. Mace reserves the right to assert additional affirmative defenses as discovery progresses and additional facts become known.

FOR A SIXTEENTH AFFIRMATIVE DEFENSE

157. Mace reserves her right to seek certification under the Westfall Act, 28 U.S.C. § 2679, that she was acting within the scope of her employment as a United States Congresswoman at all times relevant to Bryant's claims. Upon such certification, the United States shall be substituted as the party defendant.

FOR A SEVENTEENTH AFFIRMATIVE DEFENSE

158. Bryant's invasion of privacy claim fails because Bryant had no reasonable expectation of privacy as to Mace. Bryant gave Mace express permission to access his phone, added her thumbprint to his phone, and told her she could access it whenever she wanted. Bryant thereby waived any expectation of privacy in the contents of his phone as to Mace.

FOR AN EIGHTEENTH AFFIRMATIVE DEFENSE

159. Mace's actions were taken for a legitimate purpose. Mace discovered materials on Bryant's phone depicting what appeared to be an unconscious woman being sexually assaulted and took steps to identify the victims and report the conduct to law enforcement. Mace's actions were justified and undertaken to protect victims of alleged criminal conduct.

FOR A NINETEENTH AFFIRMATIVE DEFENSE

160. To the extent Mace was acting within the scope of her employment as a United States Congresswoman, Bryant's exclusive remedy, if any, lies against the United States under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671-2680. Certain claims asserted by Bryant, including defamation and intentional torts, are excepted from the FTCA's waiver of sovereign immunity under 28 U.S.C. § 2680 and are therefore barred.

RESPONSE TO BRYANT'S PRAYER FOR RELIEF

Mace denies that Bryant is entitled to any of the relief requested in his Prayer for Relief. Mace reserves all defenses, including certification that her alleged actions were within the scope of her employment as a United States Congresswoman pursuant to the Westfall Act, 28 U.S.C. § 2679, any defenses under the Federal Tort Claims Act, absolute privilege for statements made in judicial proceedings, qualified privilege, and any protections afforded by the Speech or Debate Clause, U.S. Const. art. I, § 6, cl. 1.

MACE'S PRAYER FOR RELIEF

WHEREFORE, having answered Bryant's Amended Third-Party Complaint, Third Party Defendant Nancy Ruth Mace respectfully requests that this Court:

- a. Dismiss Bryant's Amended Third-Party Complaint in its entirety and with prejudice;
- b. Enter judgment in favor of Mace on all claims asserted against her;
- c. Award Mace her costs and attorney's fees incurred in defending this action;
- d. Grant such other and further relief as this Court deems just and proper;
- e. Mace reserves the right to amend this Answer and to assert counterclaims as discovery progresses and additional facts become known; and
- f. Mace demands a trial by jury on all issues so triable.

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December 19, 2025

Florence, SC