

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON)	CASE NO.: 2025-CP-10-2671
)	
ASSIGNMENT DESK WORKS, LLC,)	
)	
Plaintiff,)	PLAINTIFF’S RETURN TO
)	DEFENDANT’S MOTION EMERGENCY
vs.)	MOTION FOR JUDICIAL
)	DETERMINATION REGARDING
ALEXIS BERG,)	USE OF EVIDENCE
)	
Defendant.)	
_____)	

TO: DEFENDANT ABOVE-NAMED AND HER ATTORNEY, MARYBETH MULLANEY, ESQ.:

The Plaintiff, by and through their undersigned counsel, responds to the Defendant’s Emergency Motion for Judicial Determination Regarding Use of Evidence as follows:

BACKGROUND

Contrary to the characterization of this action by Defendant in her Motion, this case actually asserts claims against Defendant for breach of contract and requests injunctive relief from the Court. The facts alleged in support of the breach are as follows:

Despite and in violation of this restraint against non-disparagement, Defendant made false and disparaging statements about ADW’s co-founder and managing member, Patrick Bryant, to third parties. In particular, on or about February 12, 2025, Defendant contacted Erin Gunther, an ADW, employee and told her she was sexually assaulted in the presence of Patrick Bryant and encouraged her to leave her position with ADW because of Patrick Bryant’s actions. and further suggested that ADW was not a place where employees should want to work. Defendant also admitted to contacting and discussing these allegations with other current and former ADW employees in an effort to spread her disparaging claims.

Compl. ¶ 8.

Bryant’s relationship with other women has absolutely nothing to do with the claims or defenses in this case. Furthermore, despite the efforts of Defendant and Nancy Mace to accuse

Bryant of a multitude of sexual crimes, not one woman other than Defendant as brought an action against Bryant, including Mace. The Court has already limited the scope of discovery in this case to what allegedly happened the night of October 25 – 26, 2018. The fact that counsel for Defendant continues to argue that her efforts to produce pictures of other women unrelated to this litigation are consistent with her ethical duty to advocated zealously for her client is a total mischaracterization of her obligation to Defendant and just another example of her willingness to exceed the bounds of professionalism and reasonableness.

WHEREFORE, Plaintiff respectfully requests that this Court issue an Order:

- A. Denying Defendant’s Motion;
- B. Awarding attorney’s fees and cost, as well as any other sanctions to Plaintiff; and
- C. Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

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March 4, 2026
Charleston, South Carolina