

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)
)
)
ASSIGNMENT DESK)
WORKS, LLC,)
)
Plaintiff,)
vs.)
)
ALEXIS BERG,)
)
Defendant.)

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2025-CP-10-02671

SUPPLEMENTAL BRIEF

BY
JULIE J. ARMSTRONG
CLERK OF COURT
2026 MAR -5 PM 4: 37

FILED

MEMORANDUM REGARDING PENDING MOTIONS

COMES NOW, Representative Nancy R. Mace (“Rep. Mace”), providing the Court additional information relevant to the pending motions.

First, I have been excused from the hearing tomorrow March 6, 2026. My understanding is that none of the motions relating to me directly will be heard. I had previously told the Court that I would file a supplemental brief outlining my position. This is that filing.

Second, I note that this case arises from another case where Defendant prevailed in a wage payment dispute against Plaintiff. Then, Defendant spoke truthfully about being the victim of sexual assault at the hands of someone other than the Plaintiff but is now, remarkably, being sued by the Plaintiff for her truthful and courageous statement.

Third, I have become involved because my personal files were made available by a google drive to Plaintiff’s attorney, Marybeth Mullaney (“Ms. Mullaney”) on the express basis of my seeking legal advice from her, assisting her client in the SLED investigation against Plaintiff and others, and assisting her client in her lawsuit with Plaintiff and others. I believed there was information relevant to all parties on all fronts and I would never keep relevant information in

my possession hidden from a rape victim. I entrusted Ms. Mullaney with information because I believed my information was being protected. On or about May 2025, I asked Ms. Mullaney to evaluate my potential causes of action. At the time I was also informed of her client's "class action" lawsuit and operated on that basis. There was also an ongoing SLED investigation that multiple victims were involved with. For the above reasons, I shared the google drive.

Unbeknownst to me, and without my consent, Ms. Mullaney or her office staff, downloaded all of the files in my google drive. See Exhibit A where I sought her legal advice:

On May 17, 2025, at 6:53 a.m., Rep. Mace wrote to Mullaney:

"Can we talk asap? I'd like to ask your thoughts about me also filing a suit against Patrick Bryant. After Ali files hers. CNM"

Mullaney responded the same day at 12:15 p.m.,

"Hey. Just saw this. Yes, I can. Feel free to call my cell phone. (Number redacted). Kind Regards, Marybeth."

That phone call took place on May 18, 2025 for more than 30 minutes, and the discussion during that call included discussions of Ms. Mullaney's "class action" lawsuit and the possibility representing me in claims against Mr. Bryant and others. Ms. Mullaney expressed specific interest in representing me in a class action on behalf of multiple victims. She was also interested in pursuing other victims. I was also intent on assisting her client, a rape victim, in the law enforcement investigation. Thus, based on the representations made by Ms. Mullaney, I agreed to allow Ms. Mullaney to review the evidence folder so she could make a judgment as to whether it would be supportive of legal claims and claims for the criminal investigation.

On or about May 29, 2025 I held a press conference at my office reading from what I was told was a "class action" lawsuit. After the press conference Ms. Mullaney informed me it was no longer a "class action" lawsuit.

Additionally, I copied Ms. Mullaney and her client on dozens of emails to SLED in support of the open and ongoing criminal investigation. To reiterate, I also provided access to to my google drive which I believed had information for a rape victim in support of the criminal investigation into her rape. *I've spent my career fighting for victims - in this criminal investigation, in courtrooms, in committee rooms, and on the floor of Congress.* I will do everything I can to assist a victim in getting justice, but that does not mean I, as a victim, can be revictimized by an attorney taking advantage of my private information, protected ny numerous privileges, and revictimizing me all over again.

In no way, shape or form, did I ever give Ms. Mullaney or her client “free reign” over my personal documents which are unrelated to her client’s civil suits or the criminal investigation. I have thousands of files, and there is no way I would have been able to produce documents to assist her or her client if she and her client didn’t have access to my files.

Rep. Mace’s evidence was provided to Ms. Mullaney via google drive with the understanding that it was confidential and under the condition that the information would not be shared with anyone without my express permission. When Ms. Mullaney received the evidence, she again assured me that she would not share the information without my express permission. Unbeknownst to me, Ms. Mullaney, through her paralegal, took all my files, including my personal information, much of which was and is completely unrelated to the claims discussed with Ms. Mullaney, much of which is private, personal and sensitive information, and nearly all of which has nothing to do with this particular case. **See Exhibit B** that reveals the extent of the unauthorized download of my personal files: Ms. Mullaney states:

*“In June, shortly after I filed the lawsuit, Nancy gave me access to her Google Drive because she believed it contained information that would be helpful to Ali’s case. I had my paralegal download the contents at that time, **not fully realizing the scope of what it contained**”*

and that many of the documents would not be relevant to Ali's case..."

This admission is stunning given the express purpose of my providing access to my files for review. And from that unauthorized action of Ms. Mullaney, all of this incredible back and forth of motions has ensued. All of that material should be returned because it is protected by the attorney-client privilege, work-product doctrine, common interest privilege, law enforcement investigative privilege, and privileges related to being a prospective client.

South Carolina Rules of Professional Conduct, Rule 1.18 states that: "A person who engages in mutual communication with a lawyer about the possibility of forming a client-lawyer relationship with respect to a matter is a prospective client only when there is a reasonable expectation that the lawyer is likely to form the relationship." South Carolina Rules of Professional Conduct 1.18. Even where no client-lawyer relationship ensues, a lawyer shall not use or reveal information they learned from a potential client, except as Rule 1.9 would permit with respect to information of a former client. *Id.*

Here, I approached Ms. Mullaney for the specific purpose of seeking representation for a number of civil claims. This is evidenced by the email attached as **Exhibit A**. This communication indicates that I and Ms. Mullaney had a reasonable expectation that we were likely to form a client-lawyer relationship. This is further evidenced by the fact that I shared her confidential, personal information and evidence with Ms. Mullaney for the purpose of ascertaining whether I would have a viable claim against Mr. Bryant. Moreover, there is nothing in writing from Ms. Mullaney putting me on notice that she was not going to represent me.

As such, I was a prospective client under the South Carolina Rules of Professional Conduct, and I am entitled to the protections that are afforded to prospective clients - any information sent to Ms. Mullaney shall not be disclosed or used for any other purpose. *Id.* Rule

1.18. Unfortunately, Ms. Mullaney, and others, have both used the information for other purposes and disseminated my private materials publicly. It is improper for my personal information to be used or revealed in any form and it should be returned to me immediately.

Fourth, I note that I had phone calls and text messages with Ms. Mullaney and her client discussing her case and other possible cases. For the Court additional evidence of the attorney-client and common interest relationship with Ms. Mullaney. On June 10, 2025, Ms. Mullaney communicated with Rep. Mace and Ms. Berg in a group text message in which Ms. Mullaney sought Rep. Mace's express consent before adding factual allegations to her amended complaint, asking: "*Nancy are you ok with me adding in a sentence to the amended that states you Bryant settled the dispute over the homes they owned together in mediation on May 28, 2024?*" Rep. Mace responded affirmatively. Ms. Mullaney also discussed coordinated litigation strategy with Rep. Mace, including suing GLT2 and ADW for abuse of process. This is not the conduct of an attorney and a mere third-party witness - this is the conduct of an attorney and a client or an attorney and a prospective client. These communications further establish that Rep. Mace's materials were shared in the context of a protected relationship and may not be used or disclosed by Ms. Mullaney or any party who received them through her. **See Exhibit C and Exhibit D.**

Fifth, I note that ADW's counsel has filed numerous motions and filled them with unsupported statements, no evidence, lack of any context, and nothing but salacious storytelling meant to impugn my character and that of Ms. Berg. All of this, and counsel has never sent me a subpoena for evidence or testimony, preferring unsupported nonsense to actual, legally obtained evidence. I merely seek the protections available to me under Rules 26 and 45 and other applicable rules or laws that may be applicable here, to allow for the return of my personal files,

which would then, if the parties so desire, be subject - potentially - to production under the protections that have thus far been unavailable to me because of the unauthorized and improper download and distribution of the materials.

Sixth, I note that ADW's counsel filed a pleading on March 4, 2026 asserting as "undisputed" that Rep. Mace stole Bryant's S22 phone. This is false, and notably irreconcilable with Bryant's own sworn Amended Third-Party Complaint, filed November 6, 2025, in which Bryant alleged he "immediately retrieved his Phone from Mace." Bryant cannot have immediately retrieved his phone and simultaneously had it stolen by Rep. Mace. At least one of these sworn statements is false, and ADW's counsel had an obligation under Rule 11 to investigate this contradiction before repeating it as "undisputed" fact in a court filing. I will have much more to say about the continued false statements in court pleadings regarding Mr. Bryant's S-22 device.

I look forward to the opportunity to present further information and argument in support of my position soon.

This 5th day of March, 2026.

s/ Nancy R. Mace

A handwritten signature in black ink that reads "Nancy Mace". The signature is written in a cursive, flowing style.

Nancy R. Mace
Member of Congress
Pro Se

EXHIBITS

EXHIBIT A

1/30/26, 7:21 AM

Nancy Mace for Governor Mail - Patrick Bryant



Nancy Mace <nancy@nancymace.org>

Patrick Bryant

2 messages

Nancy Mace <nancy@nancymace.org>
To: marybeth@mullaneylaw.net

Sat, May 17, 2025 at 6:53 AM

Can we talk asap? I'd like to ask your thoughts about me also filing a suit against Patrick Bryant. After Ali files hers.

CNM

Marybeth Mullaney <marybeth@mullaneylaw.net>
To: Nancy Mace <nancy@nancymace.org>

Sat, May 17, 2025 at 12:17 PM

Hey. Just saw this. Yes, I can. Feel free to call my cell phone. (843) 813-8089

Kind Regards,
Marybeth

The logo for Marybeth Mullaney, consisting of the lowercase letters 'mm' in a large, blue, serif font.

MARYBETH MULLANEY

ATTORNEY AT LAW

4900 O'Hear Ave. Ste 100 & 200 North Charleston, SC 29405

P: 843-588-5587 / F: (843) 459-8554

marybeth@mullaneylaw.net

[Quoted text hidden]

EXHIBIT B

From: Marybeth Mullaney <marybeth@mullaneylaw.net>
Sent: Sunday, January 18, 2026 5:16 PM
To: D. Craig Brown <craigbrown@craigbrownlawfirm.com>
Cc: Bennett Kesler <bennett@mullaneylaw.net>
Subject: Nancy's Google Drive

Hi Craig,

I hope you are having a nice weekend. I wanted to follow up with you on Nancy's Google Drive.

In June, shortly after I filed the lawsuit, Nancy gave me access to her Google Drive because she believed it contained information that would be helpful in Ali's case. I had my paralegal download the contents at that time, not fully realizing the scope of what it contained and that many of the documents would not be relevant to Ali's case.

I have already produced the pictures and videos of women that Mace reportedly found on Bryant's phone in the ADW v. Berg case that were in her Google Drive. (I have not produced them in the Berg v. Bryant case in light of the Judge's ruling at the 12/30/25 hearing) Given that Ali's defense is that she was speaking the truth and that Bryant recorded her and other women without their knowledge, I turned over the pictures and videos from Nancy's Google Drive that appeared to have been taken of women without their knowledge. I did not produce the entire drive.

I have now had the opportunity to review all the documents my paralegal downloaded, and I believe there may be additional documents that could be considered relevant to Ali's defense in the ADW v Berg case and also relevant in the Berg v. Bryant case. However, I do not want to turn over any additional documents until I've had a chance to speak with

EXHIBIT C

Alexis Berg, MaryBeth Mullaney
Group message



Nancy are you ok with me adding in a sentence to the amended that states you Bryant settled the dispute over the homes they owned together in mediation on May 28, 2024?

MaryBeth Mullaney • Jun 10, 2025

Yes



Jun 10, 2025

My motion for an emergency hearing is being filed right now!

Or dismissal and sanctions... whatever it's called



Jun 10, 2025

Ok working on mine



I will file the amended complaint shortly

MaryBeth Mullaney • Jun 10, 2025



Are you also filing a motion or complaint in the
GLT case too?



Jun 10, 2025

Yes

Just a motion



But I added GLT into the amended complaint
and am suing them for abuse of process

MaryBeth Mullaney • Jun 10, 2025



Is that part of the amended complaint suing
them for abusive process or is that a separate
thing?



Jun 10, 2025



It is part of it. That is why I am filing the
amended complaint. To sue GLT2 and ADW

MaryBeth Mullaney • Jun 10, 2025

Alexis Berg, MaryBeth Mullaney
Group message



It is part of it. That is why I am filing the amended complaint. To sue GLT2 and ADW

MaryBeth Mullaney · Jun 10, 2025

Ahhh gotcha!

Can I get in on suing GLT 2 Also with you?

Or is that not a thing?



Jun 10, 2025



Let's email Mary Grace and Bill and get their thoughts on that

MaryBeth Mullaney · Jun 10, 2025

Or maybe you amend your defamation complaint against Bowman to add in those claims and Defendants. Let's see what Bill and Mary Grace think



MaryBeth Mullaney · Jun 10, 2025



EXHIBIT D

Phone records show calls between Ms. Mullaney and Rep. Mace on the following dates, but not limited to:

May 18, 2025 - 33 minutes

May 19, 2025 - 2 minutes

May 22, 2025- 11 minutes

May 25, 2025 - 5 minutes

May 25, 2025 - 11 minutes

May 26, 2025 - 33 minutes

May 29, 2025 - 2 minutes

May 29, 2025 - 4 minutes

May 29, 2025 - 12 minutes

June 3, 2025 - 23 minutes

June 3, 2025 - 37 minutes

June 4, 2025 - 2.5 minutes

June 8, 2025 - 22 minutes

June 9, 2025 - 3 minutes

June 9, 2025 - 3 minutes

June 9, 2025 - 3 minutes