

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT

ASSIGNMENT DESK WORKS,

CASE NO. 2025-CP-10-2671

Plaintiff,

**ORDER REGARDING THIRD-PARTY  
NEUTRAL**

vs.

ALEXIS BERG,

Defendant.

The Court issues this Order to resolve the following motions of Proposed Intervenor Nancy Mace ("Mace"): (1) Mace's Emergency Motion to Intervene, Dismiss, and for Sanctions; (2) Mace's Motion to Stay; and (3) Mace's Emergency Motion for Restraining Order, all filed on Jan. 27, 2026, and following hearing of same on May 14, 2026. Attorneys Cordes Ford and Bill Hunter appeared for Mace. Attorney Marybeth Mullaney appeared for Defendant. Attorney Rene Dukes appeared for Plaintiff. Attorney Matt Gallo appeared for Patrick Bryant, a party to a related case (*Jane Doe v. Patrick Bryant* 2025-CP-10-3124, currently removed to Federal Court pending resolution of a motion to remand) and an owner of Plaintiff. The primary subject of the motions and this order is the proper disposition of materials stored in Mace's Google Drive, access to which is currently possessed by Ms. Mullaney. Upon receiving argument and considering the briefing and proposed order on file from the above-named counsel, the Court hereby orders as follows:

1. Already-Produced Materials Remain in the Record, No Claw-Back. All documents from Mace's Google Drive that have already been produced in this case and in *Jane Doe v. Patrick Bryant* 2025-CP-10-3124 shall remain in production in both matters. Nothing in this Order shall limit, restrict, or otherwise impair Defendant's right to use the already-produced materials in her defense in either action, including in depositions, motions, at trial, or in any related proceedings,

subject to any rulings by the Court **and subject to a Confidentiality Order**. All such documents produced shall remain confidential until later Order of this Court to the contrary, if any. Defendant's counsel has provided Mace's counsel with a copy of any documents or files that have been produced in this case from the Google Drive. Defendant's counsel shall further specify to whom such productions have been made in this or any other case. Defendant's counsel shall have a continuing duty to supplement the confirmatory disclosure to Mace's counsel upon discovery of any documents produced in litigation from the Google Drive that were not included in her initial production to Mace.

2. Unproduced and Produced Materials Shall Be Provided to a Neutral to Determine Whether Documents Exist Which Would Require Production. All materials from Mace's Google Drive that have not yet been produced in either case and which have been produced in either case shall be provided to a third-party neutral to evaluate the documents for discovery purposes. The third-party neutral shall treat all documents or items received as confidential and will sign a sworn declaration confirming such obligation. The Court recognizes that Mace objects to this procedure.

Once the third-party neutral has completed the task of determining whether additional documents could warrant production in this matter only, the third-party neutral shall provide a list of the documents he or she believes warrant inclusion in discovery. A copy of those items shall be produced to the attorneys in this matter as Attorney's Eyes Only. Following the production to the attorneys, each party shall have thirty days to object to the disclosure of any document listed by the neutral. Any such motion objecting to inclusion shall be filed under seal.

3. No Finding Regarding Privilege or Admissibility. Nothing in this Order constitutes a finding or ruling that any materials produced from Mace's Google Drive are privileged, unprivileged, admissible, or inadmissible. All such questions are reserved for determination by

this Court on proper motion.

4. No Finding Regarding Prior Productions. Nothing in this Order shall be construed as a finding or admission regarding the propriety or impropriety of any prior production of documents in this litigation.

5. No Finding Regarding Ownership of Materials in Mace's Google Drive. Nothing in this Order shall be construed as a determination at this time as to ownership of the 11,000+ files in Mace's Google Drive, as both Mace and Bryant claim ownership.

6. No Consent. This is not a Consent Order.

**IT IS SO ORDERED!**

---

Donald Hocker  
Circuit Court Judge