

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF SPARTANBURG) SEVENTH JUDICIAL CIRCUIT
))
) C/A No. 2026CP4204208
))
Renee S. Beach, Phillip Beach, Robin Beach) AMANDA MATNEY'S
Savannah Tuten, and Seth Tuten,) REPLY IN SUPPORT OF HER
Plaintiffs,) RULE 59(e) MOTION TO
) RECONSIDER THE ORDER
v.) FINDING HER IN CONTEMPT
) AND THE CONFIDENTIALITY
) ORDER
Gregory M. Parker, Gregory M. Parker, Inc.)
d/b/a Parker's Corporation, Blake Greco,)
Jason D'Cruz, Vicky Ward, Max Fratoddi,)
Henry Rosado, and Private Investigation)
Services Group, LLC,)
Defendants.)

Amanda "Mandy" Matney ("Ms. Matney") submits this Reply in support of her Rule 59(e) Motion to Reconsider filed August 2, 2026 (the "Motion"), and in reply to the Parker's Defendants' Response in Opposition filed August 18, 2026 (the "Response"). In addition to the arguments previously raised by Ms. Matney, Ms. Matney would submit the following reply.

SUMMARY OF ARGUMENT

The Parker's Defendants argue that Ms. Matney had a full opportunity to challenge the reasonableness of \$171,500 in attorney's fees and simply failed to take it. Their own recitation of the facts shows otherwise. As they explain in their Response, they asked the Court's law clerk whether the itemized billing should be submitted to the law clerk and only to the law clerk, the law clerk told them that it should, and they submitted the billing on that basis. On the afternoon of the same day, Ms. Matney's counsel wrote asking to see the itemized fees and to be heard on their reasonableness, and the Court signed the Order fixing the award the following morning. Ms. Matney was never given a fair opportunity to challenge the reasonableness of the fee.

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

The Parker's Defendants fall back on the position that Ms. Matney should have used the Confidentiality Order to obtain the records. That Order was signed three hours after the Contempt Order and filed the same morning, five minutes behind it, so it could not have given her access at any point before the award was set. It does not give her access now either, because by its terms it governs documents that have been produced, and the itemized billing was never produced to her.

Second, fourteen pages of the Response, together with its exhibits, consist of material that did not exist on July 13, 2026. Because a Rule 59(e) motion asks whether the Order rests on error given the record the Court had before it, the additional material the Parker's Defendants have submitted to buttress their argument that Ms. Matney should be held in contempt should be stricken. If it is not stricken, Ms. Matney should be permitted to answer it with evidence concerning these matters.

Third, when a rule to show cause was aimed at the Parker's Defendants' own investigator in this case, their counsel told this Court that the absence of a supporting affidavit was a fatal defect that no later filing could cure. Ms. Matney would now submit the same authority and reasoning in support of her motion to alter or amend.

Ms. Matney asks the Court to grant the Motion. At a minimum, she asks the Court to vacate the fee award, order the itemized billing produced to her counsel, and hold an evidentiary hearing on reasonableness before any fee is imposed.

I. MS. MATNEY NEVER HAD A FULL AND FAIR OPPORTUNITY TO LITIGATE THE REASONABLENESS OF THE FEES.

A. Ms. Matney requested to challenge the reasonableness of the fees.

On July 2, 2026, the Court's law clerk asked the Parker's Defendants to provide "an affidavit of attorney fees and costs related to the missed deposition." (Resp. in Opp. ¶ 29; Motion,

Ex. A at 5-6.) On July 9, 2026, the law clerk asked them to "provide, under seal, itemized bill statements related to Mrs. Matney's deposition, the Rule to Show Cause hearing, and the May 15 and June 22 contempt proceedings." (Resp. in Opp. ¶ 30; Motion, Ex. A at 3-4.) The Parker's Defendants then asked the law clerk "whether to submit the bill statements to the law clerk and only to the law clerk," and the law clerk "responded in the affirmative." (Resp. in Opp. ¶ 31; Motion, Ex. A at 2-3.) They accordingly "submitted the requested itemized bill statements solely to the Court's law clerk." (Resp. in Opp. ¶ 32.) At 4:22 p.m. that same day, Ms. Matney's counsel wrote to renew the request "to see the itemized fees and for an opportunity to be heard on the reasonableness of the requested fees." (Resp. in Opp. ¶ 33; Motion, Ex. A at 1.)

The Court signed the Order the next morning, July 10, 2026, at 11:33:14 a.m. (Order at 22.) It signed the Confidentiality Order that afternoon at 2:52:31 p.m. (Confidentiality Order at 8.) Both were filed on July 13, 2026, the Order at 9:30 a.m. and the Confidentiality Order at 9:35 a.m.

Ms. Matney did not sit on her rights. She asked in writing to see the billing and to be heard on it before the Order issued, and the reason she never saw it was the Court's own instruction that the statements be provided to the law clerk and to no one else.

The certified statement¹ of Rebecca K. Lindahl, attached as Exhibit A, sets out the same sequence from counsel's side. Ms. Lindahl attests that she asked to see the itemized fees and to be heard on their reasonableness, that the itemized billing statements were never provided to Ms. Matney or to her counsel, and that she has never seen or reviewed them. She further attests that the decision not to disclose the detailed invoices to Ms. Matney's counsel significantly impaired her ability to challenge the reasonableness of the fees this Court awarded. (Ex. A.) Had the invoices been produced, Ms. Lindahl would have examined the hourly rate applied to each timekeeper and

¹ This statement was certified by an officer of the Court. However, the Certification will be supplemented with a notarized affidavit.

each task, determined which entries were attributable to the March 27 nonappearance and its enforcement as opposed to the other matters litigated at the same hearings, looked for duplication of effort among the three law firms, identified any block-billed entries that cannot be apportioned, and determined which entries the Court removed in arriving at its 44.7% reduction. (Ex. A.) She was able to do none of that from the affidavits alone.

The Parker's Defendants answer with Rule 7(b)(1), SCRCP, which they read to require that any request for relief be made by written motion. That reading omits the balance of the rule they quote, which calls for a writing "unless made during a hearing or trial in open court with a court reporter present." Ms. Matney's counsel asked in open court, on the record, for the opportunity to review the fee submissions and to be heard on their reasonableness, and the Court indicated that she would have that chance. (Ex. B, Video of June 22, 2026.) In any event, the Parker's Defendants themselves obtained a ruling from this Court on the manner of submission, which is the very ruling that kept the billing from Ms. Matney, by e-mail to the law clerk and without filing any motion at all. (Resp. in Opp. ¶ 31.)

B. Contrary to the Assertions of the Parker Defendant's, Ms. Matney did seek reconsideration of the confidentiality order.

The Parker's Defendants state that Ms. Matney and her counsel "have essentially ignored this Order," that they have "yet to make any request ... for access to billing records," and that a motion to reconsider "is not the proper vehicle by which to obtain such records." (Resp. in Opp. at 23.)

The document they were answering is captioned "Rule 59(e) Motion to Reconsider Non-Party Amanda Matney's Order Finding Her in Contempt Contempt and Confidentiality Order." Its opening paragraph asks the Court to "reconsider[] ... the confidentiality order to the extent that it

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

denies her the ability to examine detail billing for the contempt matter." (Motion at 1.)² Its first request for relief asks the Court to "give Ms. Matney and her counsel full access to the sealed fee affidavits and billing records and hold a hearing on their reasonableness before any fee is awarded." (Motion at 34 ¶ 1.) The challenge to the Confidentiality Order therefore appears both in the caption and in the opening paragraph of the very motion the Response was written to oppose.

C. The Confidentiality Order did not provide sufficient remedy for non-disclosure of billing records.

The Parker's Defendants next say that Ms. Matney should have used the Confidentiality Order to obtain the billing records and "perhaps used that access to support a motion to reconsider," and that her failure to do so in "the over thirty-five (35) days" since its entry waives the point. (Resp. in Opp. at 23.)

Beyond that, the Confidentiality Order was signed three hours after the Order that fixed the award at \$171,500, and the two were filed the same morning. There was accordingly no interval during which Ms. Matney could have used the Confidentiality Order to test the bills before the number was set. Due process requires an opportunity to be heard before the sanction is imposed, and not a procedure that first becomes available afterward. See *Roadway Express, Inc. v. Piper*, 447 U.S. 752, 767, 100 S. Ct. 2455, 2464, 65 L. Ed. 2d 488 (1980) (attorney's fees "should not be assessed lightly or without fair notice and an opportunity for a hearing on the record").

The Confidentiality Order also does not do the work the Parker's Defendants assign to it. By its terms it reaches "all attorney fee affidavits and attorney fee itemized billing statements produced to Mandy Matney's Contempt Proceedings." (Confidentiality Order ¶ 1.) The itemized

² This sentence contained a transcription error cause by a misunderstanding in a speech to text app used by one of Ms. Matney's Attorneys.

statements were never produced, having gone to the law clerk alone. (Resp. in Opp. ¶ 32.) Paragraph 4.b, on which the Parker's Defendants rely, provides only that certain categories of persons "may be allowed to review" designated documents, and that permission is conditioned on a certification by counsel and presupposes a document that has been produced to someone in the first place. Paragraph 7.b sets out the procedure for challenging a confidential designation, and it requires the challenging party to give "written notice ... of the specific basis for the challenge," which is not something a person can supply as to a document she has never seen. The Parker's Defendants appear to recognize as much, because their offer to produce the records is expressly conditioned on "the approval of the Court" and on further conditions of their own devising. (Resp. in Opp. at 23.) Nothing in the Confidentiality Order gives Ms. Matney a right of access she can exercise on her own.

D. Without the itemized billing, Ms. Matney cannot test the rates charged.

The Order awarded \$85,650.00 to Maynard Nexsen, PC, \$45,950.00 to Deborah B. Barbier, LLC, and \$39,900.00 to Bannister, Wyatt & Stalvey, LLC. (Order at 21.) Ms. Matney has located two documents bearing on what two of those lawyers have charged, and have sworn was reasonable, in other matters within the last two years.

Submitted under seal as Exhibit C is the Letter of Engagement that Maynard Nexsen PC executed on June 23, 2025 with the Clerk of the South Carolina House of Representatives and the House Ethics Committee, for the investigation of Robert John "RJ" May III. It was produced under the South Carolina Freedom of Information Act. Mark C. Moore signed it, and it identifies him as "the Firm partner primarily responsible for supervising this Engagement." (Ex. C ¶¶ 3, 5.) Paragraph 6 of this agreement sets forth a substantially lower hourly rate for Mr. Moore.

Attached as Exhibit D is the Affidavit of Deborah B. Barbier, sworn October 7, 2024 and filed in Crespo v. Riviere, C/A Nos. 2022-CP-02-02323 and 2022-CP-02-02324, in the Court of Common Pleas for Aiken County, which appears in the Record on Appeal at RoA_0444 through RoA_0449. Ms. Barbier swore in that affidavit that "[t]he \$750 hourly rate for my attorney services and the \$425.00 hourly rate for Valerie McDonald in Exhibit 1 reflect the customary rates of my firm's billing during the relevant period," and that those rates "are consistent with the customary rates of other South Carolina attorneys of similar experience, competence, and reputation." (Ex. D ¶ 21.) She swore to those rates in a case that consumed ten days of trial and resulted in a verdict of \$45 million. (Ex. D ¶¶ 23, 28.)

The hourly rates allegedly charged to Mr. Parker far exceed the rates alleged by the attorneys in this case. As a result, Ms. Matney is being charged a far higher rate than what these attorneys charged a short time ago.

This evidence bears on the fifth Collins factor, "the fee customarily charged in the locality for similar services." *Blumberg v. Nealco, Inc.*, 310 S.C. 492, 494, 427 S.E.2d 659, 660 (1993). Under *Blumberg*, "[w]hen an award of attorney's fees is requested ... the court should make specific findings of fact on the record for each factor set forth in *Collins*." *Id.* Without the detailed billing and a specific finding on the record, Ms. Matney is uncertain if the Court awarded the attorneys their fully requested hourly fee.

Exhibit D and E are also instructive on the procedure ordinarily followed in these matters. When the reasonableness of Ms. Barbier's own fee was at issue, her affidavit attached an "Itemized Statement of Time" that "sets forth a detailed itemization of our efforts in tenths of an hour," and she swore that she had reviewed it. (Ex. D ¶¶ 20, 25.) That itemization was filed in the public

record the Record on Appeal. Ms. Matney asked so that they could be challenged by the other party.

E. Without the itemized billing, Ms. Matney cannot test the hours, the allocation among three firms, or the reduction.

The rates are only one component of the award. The Parker's Defendants requested \$310,533.39, the Court awarded \$171,500.00, and the Order describes the result as "a 44.7% percent reduction of the total fees and costs originally requested." (Order at 21.) The Parker's Defendants offer that reduction as proof that "the Court carefully evaluated reasonableness and exercised restraint." (Resp. in Opp. at 27.) The reduction also establishes that a substantial share of what was requested was not recoverable. Which entries came out, from which firm, and on what basis, the Order does not say, and Ms. Matney has no way of determining. She cannot tell whether the reduction removed time billed to matters outside the contempt, or whether it was an across-the-board cut that left such time in the award at a lower figure.

The Order excluded the Motion to Quash, finding that it "was filed as a matter of right." (Order at 18.) It did not exclude the February 17, 2026 Motion for Reconsideration, and in fact expressly included that motion in the award. (Order at 20.) That motion was filed five weeks before the March 27 nonappearance, and the Response's own Legal Standards section quotes *Elam v. South Carolina Department of Transportation* for the proposition that a party "must file such a motion" to preserve an issue for appellate review. 361 S.C. 9, 24, 602 S.E.2d 772, 780 (2004); (Resp. in Opp. at 20). Whether the hours attributable to that motion fall inside the \$171,500 or inside the 44.7% is not something Ms. Matney can determine from an affidavit.

If the contempt finding stands, the only fees properly chargeable to Ms. Matney are those incurred to enforce the deposition obligation she was found to have disobeyed, and determining

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

which hours those are requires the itemized billing. The contempt order, as it stands, lacks sufficient clarity on how the reduction applies.

Ms. Lindahl states the consequence directly: without the itemized billing statements, her ability to challenge the reasonableness of the fees was significantly impaired. (Ex. A.) The difficulty here is not one of inconvenience. When the only evidence of reasonableness is withheld from the person who has been ordered to pay, she cannot be heard on the subject in any meaningful sense.

II. THE NEW EXHIBITS AND FACTUAL ASSERTIONS IN THE RESPONSE SHOULD BE STRICKEN; IN THE ALTERNATIVE, MS. MATNEY SHOULD BE PERMITTED TO RESPOND TO THEM.

Section D of the Response runs from paragraph 37 to paragraph 50 and spans fourteen pages. Together with its accompanying footnotes and exhibits, it reproduces social media posts dated July 14, July 15, July 16 and July 30, 2026, and August 6, August 10, August 15 and August 17, 2026; a GoFundMe page and its running total "[a]s of August 16, 2026"; podcast episodes released on July 7, July 14 and July 21, 2026; and a Facebook post dated August 15, 2026. Exhibit 2 to the Response is "[a] full copy of the GoFundMe website."

The Order issued on July 13, 2026, so none of that material was before the Court when it ruled, and none of it could have been. Rule 59(e) asks whether the Order, on the record the Court had when it entered it, rests on an error of law, an overlooked fact, or an issue not ruled upon. Evidence created after the Order cannot answer that question, and it cannot supply a basis for a finding the Order does not contain.

Ms. Matney has had no opportunity to object to any of these exhibits, to cross-examine anyone about them, to place them in context, or to offer evidence in response. Nor is the material

**COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR**

offered merely as background. The Parker's Defendants rely on it as proof, asserting that it demonstrates "her disrespect for the rule of law," that certain of the statements "support a finding of willfulness on Ms. Matney's part," and that Ms. Matney is using her supporters "as a shield." (Resp. in Opp. ¶¶ 41, 47.) In substance, the Court is being asked to sustain an order entered on July 13 on the strength of evidence assembled on August 18, none of it sworn and none of it subject to any response by Ms. Matney.

Ms. Matney asks the Court to strike paragraphs 37 through 50 of the Response, footnotes 4, 9, 10 and 13, Exhibits 1 and 2, and any other factual assertion in the Response that was not before the Court on July 13, 2026.

If the Court declines to strike this material, Ms. Matney asks in the alternative for leave to respond to it by affidavit, by documentary evidence and by testimony, and for a hearing at which to do so. She should not be required to leave a one-sided account of matters postdating the Order standing unanswered in the record of a motion directed at that Order.

III. THE PARKER'S DEFENDANTS TOOK THE OPPOSITE POSITION IN THIS CASE WHEN A RULE TO SHOW CAUSE WAS DIRECTED AT THEIR SIDE.

The Parker's Defendants treat the missing affidavit as a formality satisfied by substantial compliance, rest that argument on State v. Nathans, 49 S.C. 199, 27 S.E. 52 (1897), and say that Ms. Matney's failure to address Nathans is "not only telling, but fatal." (Resp. in Opp. at 36.)

On March 15, 2022, in this case, the Parker's Defendants told this Court the opposite. Plaintiffs had moved for a rule to show cause against Sara Capelli and Inquiry Agency, LLC, non-parties who had been served with document subpoenas and who had been represented by Nexsen Pruet, LLC, the firm now known as Maynard Nexsen. The Parker's Defendants filed a Return opposing that motion, asserting a "personal right or privilege in the information sought by the

**COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR**

subpoena." (Ex. E at 4.) The Return was signed by Mark C. Moore, Susan P. McWilliams and Deborah B. Barbier, all three of whom signed the Response now before the Court. (Ex. E at 8.)

Their first argument was the one Ms. Matney advances here:

A charge of constructive contempt brought by a rule to show cause must be based on an affidavit or verified petition, and the failure to support the rule to show cause by an affidavit or verified petition is a fatal defect. ... However, Plaintiffs' counsel failed to submit an affidavit or verified petition. Further, any attempt to submit an affidavit after filing the Motion would run afoul of Rule 6(d) of the South Carolina Rules of Civil Procedure. ... Therefore, at the outset, the Motion fails because of its violation of Rule 6(d) and failure to attach an affidavit.

(Ex. E at 5.)

The authority they cited for that proposition was *State v. Kennerly*, 331 S.C. 442, 450-51, 503 S.E.2d 214, 219 (Ct. App. 1998), *aff'd*, 337 S.C. 617, 524 S.E.2d 837 (1999), together with *Toyota of Florence, Inc. v. Lynch*, 314 S.C. 257, 442 S.E.2d 611 (1994). (Ex. E at 5.) *Toyota of Florence* holds that "[t]he failure to support the rule to show cause by an affidavit or verified petition is a fatal defect." 314 S.C. at 267, 442 S.E.2d at 617. The Court of Appeals restated that holding in *Miller v. Miller*, 375 S.C. 443, 455, 652 S.E.2d 754, 760 (Ct. App. 2007), which is the decision this Court's Order relies on for the contempt power and the fee standard, and which the Parker's Defendants themselves cited in the same 2022 Return. (Ex. E at 7 n.3.) *Toyota of Florence* is a decision of the Supreme Court of South Carolina and remains good law, while *Nathans*, on which the Response rests this portion of its argument, was decided in 1897.

The Return went further. It told this Court that "[c]ontempt is an extreme measure; this power vested in a court is not lightly asserted," quoting *Bigham v. Bigham*, 264 S.C. 101, 104, 212 S.E.2d 594, 596 (1975), which is the same decision the Response now cites for a different proposition. (Ex. E at 3; Resp. in Opp. at 21.) It argued that a party who answers an objection with a contempt motion rather than a motion to compel has "exercise[d] blatant disregard for the clear

procedural requirements of the applicable rule" by jumping "immediately to moving the Court for the ultimate sanction here, contempt." (Ex. E at 6.) And it closed by asking the Court to see the motion "for what it is: an attempt to intimidate, annoy, embarrass, and oppress." (Ex. E at 7.)

Ms. Matney does not rely on judicial estoppel. South Carolina has adopted that doctrine "as it relates to matters of fact, not law," and it requires, among other elements, that the party have succeeded in maintaining the earlier position and that the inconsistency form part of an intentional effort to mislead the court. *Cothran v. Brown*, 357 S.C. 210, 215-16, 592 S.E.2d 629, 632 (2004). Ms. Matney's argument does not depend on any of that.

The 2022 Return is the Parker's Defendants' own considered statement to this Court, in this action, of what South Carolina law requires before a person may be brought in on a rule to show cause, and they made that statement at a time when the requirement operated to the benefit of their side of the case. It is also an answer to any suggestion that Ms. Matney's objection is opportunistic or newly minted, since the objection she raised in writing on April 6, 2026, and again on May 13, 2026, is the objection their own counsel raised in 2022, on the same authority, in this same case.

The Parker's Defendants have not explained why Toyota of Florence governed when the respondents to a rule to show cause were subpoena recipients on their side of this case, but does not govern when the respondent is the journalist they subpoenaed. Respectfully, they should be required to do so.

IV. INACCURACIES IN THE RETURN THAT NEED TO BE CORRECTED.

The table below sets out a sample. It is not a complete list of the discrepancies between the Response and the record, and Ms. Matney does not waive any discrepancy omitted from it. She has confined the table to items that can be resolved by comparing the Response either to a document already before this Court or to the Response itself.

**COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR**

No.	The Response States	The Record Shows
1.	The Response's first argument heading states that Ms. Matney "Had a Full Opportunity to Challenge the Reasonableness of Attorneys' Fees and Costs and Failed to Do So." (Resp. in Opp. at 22.)	The Parker's Defendants asked the law clerk whether the itemized statements should be submitted "to the law clerk and only to the law clerk," the law clerk "responded in the affirmative," and they then "submitted the requested itemized bill statements solely to the Court's law clerk." (Resp. in Opp. ¶¶ 31-32.) Ms. Matney has never seen them.
2.	Ms. Matney made no oral motion challenging the reasonableness of the fees at the May 15 or June 22, 2026 hearings, and so raises the issue for the first time on reconsideration. (Resp. in Opp. at 24 & n.12.)	Ms. Matney's Counsel Requested the opportunity to object to the reasonableness on June 22, 2026. The Court indicated that she could on July 6. (Ex. B).
3.	A request to be heard on reasonableness required a written motion under Rule 7(b)(1), SCRCP. (Resp. in Opp. at 24.)	Rule 7(b)(1) requires a writing "unless made during a hearing or trial in open court with a court reporter present." The Parker's Defendants themselves obtained the Court's direction on how to submit the billing under seal by e-mail to the law clerk, without any motion. (Resp. in Opp. ¶ 31.)
4.	Ms. Matney and her counsel "have essentially ignored" the Confidentiality Order and have "yet to make any request" for access, and she "never challenged" it. (Resp. in Opp. at 23.)	The Motion the Response answers is captioned "Rule 59(e) Motion to Reconsider Non-Party Amanda Matney's Order Finding Her in Contempt and Confidentiality Order," and it asks the Court to reconsider "the confidentiality order to the extent that it denies her the ability to examine detail billing for the contempt matter." (Motion at 1; see also id. at 34 ¶ 1.)
5.	Ms. Matney "could have immediately sought such access (by motion or agreement) following the issuance of the Confidentiality Order and perhaps used that access to support a motion to reconsider." (Resp. in Opp. at 23.)	The Order fixing the award at \$171,500 was signed at 11:33:14 a.m. on July 10, 2026, and the Confidentiality Order was signed at 2:52:31 p.m. that same afternoon. Both were filed on July 13, 2026, five minutes apart. (Order at 22; Confidentiality Order at 8.)
6.	Ms. Matney's motion to deposit the sanction with the Clerk "shows she has the ability to pay," so that her request for an ability-to-pay inquiry "rings hollow." (Resp. in Opp. at 29.)	Ms. Matney's motion to deposit funds indicate that Luna Shark Productions, LLC will be paying the funds on her behalf.
7.	"Ms. Matney never filed a police report." (Resp. in Opp. at 35.)	Incident report filed by Ms. Matney and Mr. Moses concerning James Seidel on April 2, 2026 (Ex. G), and a report filed by counsel Rebecca Lindahl with the Charlotte-Mecklenburg Police Department (Ex. H).

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

Ms. Matney sets these out because the Parker's Defendants ask the Court to deny reconsideration largely on the strength of their factual account of what occurred. To the extent that account cannot be reconciled with the record, the Court should not rely upon it.

CONCLUSION

Ms. Matney respectfully asks the Court to grant the Motion for the reasons stated in it and above, and specifically to:

1. Vacate the \$171,500.00 fee award; or, at a minimum, order the Parker's Defendants to produce the itemized billing statements to Ms. Matney's counsel subject to the Confidentiality Order, and hold an evidentiary hearing on reasonableness, at which Ms. Matney may examine the affiants and present evidence, before any fee is imposed, followed by specific findings of fact on each Collins factor;
2. Strike paragraphs 37 through 50 of the Response, footnotes 4, 9, 10 and 13, Exhibits 1 and 2, and any other factual assertion in the Response that was not before the Court on July 13, 2026; or, in the alternative, grant Ms. Matney leave to respond to that material by affidavit, documentary evidence and testimony, and set a hearing for that purpose;
3. Grant the remaining relief requested in the Motion; and
4. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Respectfully submitted,

s/ Stuart Axelrod
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COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

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September 4, 2026

INDEX OF EXHIBITS

- Ex. A Certification of Rebecca K. Lindahl.
- Ex. B Video recording of the June 22, 2026 hearing (relevant excerpt). (SUBMITTED TO THE COURT DIRECTLY ON FLASH DRIVE).
- Ex. C Maynard Nexsen PC Letter of Engagement, South Carolina House of Representatives and House Ethics Committee, dated June 23, 2025, produced pursuant to the South Carolina Freedom of Information Act. (SUBMITTED TO THE COURT DIRECTLY AS IT IS MARKED CONFIDENTIAL).³
- Ex. D Affidavit of Deborah B. Barbier and Invoices filed in Crespo v. Riviere, C/A Nos. 2022-CP-02-02323 and 2022-CP-02-02324.

³ This document was obtained through a Freedom of Information Act request. However, out of an abundance of caution, Miss Matney is submitting it to the court directly to put it under seal since it is marked confidential.

- Ex. E Return to Plaintiffs' Motion for Rule to Show Cause on Behalf of Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Blake Greco and Jason D'Cruz, filed March 15, 2022.
- Ex. F Incident report of Amanda Matney and David Moses, April 2, 2026. (SUBMITTED TO THE COURT DIRECTLY WITH REQUEST TO FILED UNDER SEAL).
- Ex. G Charlotte-Mecklenburg Police Department report of Rebecca K. Lindahl. (SUBMITTED TO THE COURT DIRECTLY WITH REQUEST TO FILED UNDER SEAL).

COURTESY OF
LUNASHARK MEDIA

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR