

EXHIBIT C
AFFIDAVIT OF CHAD HOLBROOK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
C/A No.: 2:17-cv-01792-RMG

Matthew Heath,

Plaintiff,

AFFIDAVIT OF CHAD HOLBROOK

v.

College of Charleston, Glenn F. McConnell,
President of the College of Charleston and
Matt Roberts, Director of Athletics, in their
official and individual capacities,

Defendants.

The affiant, Chad Holbrook, being duly sworn, states as follows:

1. I am the Head Baseball Coach at the College of Charleston. I assumed this position on or about July 20, 2017.
2. I have reviewed the texts that Steve Abrams identified following his review of my cell phone (attached as Exhibit "A"). I have also reviewed the statements made in the affidavit of Matt Roberts dated October 24, 2018 (attached as Exhibit "B").
3. I occasionally spoke with Matt Roberts from January 1, 2017 to July 1, 2017, and I was aware that Matt Heath was under investigation by school officials in June 2017 based solely on published news reports at the time. However, during this period I did not have any discussions with Matt Roberts about that investigation or anything else regarding Matt Heath, and no one who could be considered my "agent" did so.
4. I resigned under pressure as the coach of the USC baseball team on June 6, 2017. Up until that date, I was focused exclusively on doing everything in my power to keep that job. After

my resignation, for the rest of June and into early July my sole focus and attention was the consideration of an attractive coaching job offer in another state.

5. I sent the texts to my father, Eddie Holbrook, on April 17, 2017 and April 23, 2017 that are listed in Exhibit "A." During the college baseball season in the Winter and Spring of 2017, there was widespread public discussion concerning my future as the coach of the USC baseball team. I knew that my father – a former college basketball coach who was also forced to leave his position as the coach at Furman University – had suffered from two heart attacks and an additional atrial fibrillation and he was very concerned about my future. I sent him the texts on April 17, 2017 and April 23, 2017 as a way to give him some assurance about my future, especially since he knew that Matt Roberts and I were friends. Those texts were simply made to my father to minimize any undue stress on his everyday life considering his health history.

6. Similarly, the text I sent to my father dated June 11, 2017 on Exhibit "A" came shortly after my resignation from USC. Again, my father was in athletics and he has had serious health issues from the stress of his profession both in and out of athletics. Any communication with him was my attempt to minimize stress and worry in his life regarding my personal future.

7. I also received texts from Dale Herman, Scott Forbes, Jerry Meyers, and my sister, Nicole Arendas, that are listed on Exhibit "A." None of these texts were sent by me, and none relate to a communication between me and Matt Roberts.

8. From time to time, other college baseball coaches asked me to provide them with Matt Roberts' contact information due to my personal friendship with Matt Roberts, and on occasion I would do so. But in doing so, I never discussed anything with Matt Roberts regarding Matt Heath's position, performance, or future at the College of Charleston.

9. When I turned my cell phone over to Steve Abrams, I presumed that Mr. Abrams would search for communications between Matt Roberts and me. I understood that Judge Gergel's order stated that the College of Charleston "is ordered to produce to Steven Abrams the cell phone of its employee Chad Holbrook, for a forensic examination of any communications with Matt Roberts during the period of January 1, 2017 to July 1, 2017." I understand that Mr. Abrams exceeded this search parameter and did so without my permission.

Respectfully submitted,

/s/ Chad Holbrook
Chad Holbrook

Sworn and subscribed to this
the 24th day of December, 2018.

/s/ Karl S. Bowers, Jr.
Notary Public for South Carolina

My Commission Expires: 11/16/19

EXHIBIT A
TEXTS IDENTIFIED BY STEVE ABRAMS

12/13/2018

Mobilyze Report

Communications - Messages

Message Count	7
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Messages from/to:

Eddie Holbrook ((704) 473-7865)

2017-04-17 09:06:36 (EDT) Outgoing iMessage
 Date Delivered: 2017-04-17 09:06:38 (EDT)

Sent by: Self ((803) 622-0053)



Matt Roberts is the AD at C of C. I may go down there and coach a few years.

2017-04-23 10:31:34 (EDT) Outgoing iMessage
 Date Delivered: 2017-04-23 10:31:36 (EDT)

Sent by: Self ((803) 622-0053)



Don't say anything but Matt Roberts really want me to come be his baseball coach at the college of Charleston I'm thinking about it strongly. Please don't say anything

Messages from/to:

Dale Herman ((919) 423-8106)

Received from: Dale Herman ((919) 423-8106)



2017-06-01 19:11:05 (EDT) Incoming iMessage
 Date Read: 2017-06-01 19:11:18 (EDT)

Amy just said "Chad and Matt Roberts together. Wow". Lol

Confidential

Messages from/to:

Eddie Holbrook ((704) 473-7865)

2017-06-11 09:45:02 (EDT) Outgoing iMessage
 Date Delivered: 2017-06-11 09:45:04 (EDT)

Sent by: Self ((803) 622-0053)



Hope matt Roberts can pull it off

Messages from/to:

Scott Forbes ((919) 619-7010)

Received from: Scott Forbes ((919) 619-7010)



2017-06-13 09:43:52 (EDT) Incoming iMessage
 Date Read: 2017-06-13 09:44:03 (EDT)

Good morning my man! Can you send me Matt Roberts cell?

Messages from/to:

Jerry Meyers ((803) 394-1350)

Received from: Jerry Meyers ((803) 394-1350)

12/13/2018

Mobilyze Report



2017-06-26 22:45:41 (EDT)
Date Read: 2017-06-26 22:45:49 (EDT)

Incoming iMessage

Ok. Here's the scenarios.
If you go to Vandy, I know you'll have a bunch of guys ask you to recommend them to Matt Roberts. I wanted to see if that happens if you would recommend me first or tied for first.
If YOU go to CofC, I want to be on your staff If you want me.
Bakich wants me to fly up this weekend and I may do that. I just want to get a feel for any other options that are possibilities.
If Florida opens up I'd try to go there if a pitching job opened up.
You have any feel for what might happen? Can u keep me posted if things break?
I appreciate it.
Thanks.
Good luck deciding on Vandy and congrats for getting the opportunity.

Messages from/to:

Nicole Arendas ((336) 209-4080)

Received from: Nicole Arendas ((336) 209-4080)



2017-07-01 10:37:20 (EDT)
Date Read: 2017-07-01 10:47:29 (EDT)

Incoming iMessage

Good grief. I'm so sick of people in South Carolina. So now they're saying CoC firing their coach is a setup between you and Matt Roberts? I have no idea how you do what you do...

Confidential

EXHIBIT B
AFFIDAVIT OF MATT ROBERTS

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
C/A No.: 2:17-cv-01792-RMG

Matthew Heath,

Plaintiff,

AFFIDAVIT OF MATT ROBERTS

v.

College of Charleston, Glenn F. McConnell,
President of the College of Charleston and
Matt Roberts, Director of Athletics, in their
official and individual capacities,

Defendants.

The affiant, Matt Roberts, being duly sworn, states as follows:

1. I am the Athletic Director of the College of Charleston. I assumed this position on or about January 1, 2017. On that date, Matthew Heath was the Head Baseball Coach at the College of Charleston.

2. When I assumed my current position at the College of Charleston, Chad Holbrook was the Head Baseball Coach at the University of South Carolina. Chad Holbrook has been a personal friend of mine for many years.

3. From January 1, 2017 to July 1, 2017, on occasion I spoke with Chad Holbrook concerning personal matters.

4. However, during this period, I never communicated with Chad Holbrook in any regard concerning:

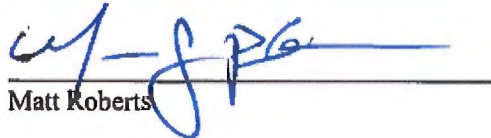
- a. Matthew Heath's performance as the Head Baseball Coach for the College of Charleston,

- b. Matthew Heath's future as a coach for the College of Charleston,
- c. Any investigation or discipline concerning Matthew Heath,
- d. Whether the College of Charleston would hire another person to replace Matthew Heath,
- e. Whether Chad Holbrook was interested in the position of Head Baseball Coach at the College of Charleston, or
- f. Whether Chad Holbrook was interested in leaving the University of South Carolina to coach in any capacity at the College of Charleston.

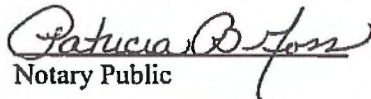
5. In sum, from January 1, 2017 to July 1, 2017, I never discussed Matthew Heath's position, performance, or future at the College of Charleston in any regard with Chad Holbrook, or anyone acting on Chad Holbrook's behalf.

6. Further the affiant sayeth naught.

Respectfully submitted,


Matt Roberts

Sworn and subscribed to this
the 24 day of October, 2018.


Notary Public

My Commission Expires:

