

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT) FOURTEENTH JUDICIAL CIRCUIT
CASE NO.: 2019-CP-25-00111

Renee S. Beach, as P.R. of the Estate of)
Mallory Beach,) PENDING IN HAMPTON COUNTY
Plaintiff,)
vs.) AFFIDAVIT OF NON-PARTY
Gregory M. Parker, Inc., et al.) VICKY WARD
Defendants.)

Personally appeared before me, Vicky Ward, who being duly sworn deposes and states as follows:

1. I am over 18 years of age and am a resident of the State of New York.
2. My full-time profession is as a journalist. I have been an employee of or contributor to numerous media outlets, including but not limited to, The New York Times, CNN, Vanity Fair, the New York Post, the Huffington Post, Town & Country, Esquire, the Financial Times, Bloomberg TV, MSNBC and other news organizations.
3. I have reported on numerous topics of national and international interest throughout my career.
4. My office is located in New York City.
5. Currently, I am working on a project to produce a news documentary concerning the Murdaugh family of Hampton County, South Carolina.
6. I am not a party in the above captioned lawsuit.
7. I do not live in Beaufort County, South Carolina.

8. I am not employed in Beaufort County, South Carolina; nor do I have an office in Beaufort County.

9. I do not regularly transact business in person in Beaufort County, South Carolina; nor do I regularly transact business in person in any county in South Carolina.

10. As a part of my newsgathering efforts for the documentary about the Murdaugh family, I spent four days in South Carolina in September 2021. To the best of my recollection, it was my first visit to South Carolina for work, and my first visit to Beaufort County for any purpose.

11. During my four days of newsgathering in South Carolina, I spent approximately two days working in Beaufort County, one day working in Hampton County, and one day working in Richland County.

12. The vast majority of my work that is necessary for the completion of the news documentary about the Murdaughs will be completed in my office in New York.

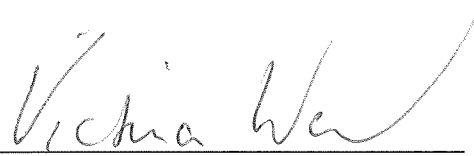
13. Without confirming or denying that any materials responsive to the present subpoena exist or are in my possession or control, I hereby assert that any such materials would have been obtained or prepared by me while engaged in the gathering and dissemination of news for the public for the documentary referenced herein.

14. Without confirming or denying that I have any information that is responsive to the present subpoena or as to which I might testify in the deposition requested in the subpoena, I hereby assert that any such information would have been obtained or prepared by me while engaged in the gathering and dissemination of news for the public for the documentary referenced herein.

15. During my 4-day visit to South Carolina in September, I requested an interview with attorney Mark Tinsley. On the morning of September 17, 2021, as I was preparing to leave for


the airport to head back to my home and office in New York, attorney Tinsley phoned to tell me that he would grant me an in-person interview. I told him that I was scheduled to board a plane back to New York that morning, and requested that he do the interview by Zoom video that night instead once I returned to my office in New York. Attorney Tinsley insisted on the in-person interview that day. In reliance on his promise to grant me the in-person interview, I changed my flight and the flight of my camera crew -- and took my camera crew to meet attorney Tinsley at his requested interview location: the law offices of Vaux, Marscher, Berglind, P.A. in Bluffton, South Carolina. When I arrived, attorney Tinsley was not present or available for an interview. Instead, a process server met me and served me with the present subpoena.

FURTHER AFFIANT SAYETH NAUGHT.



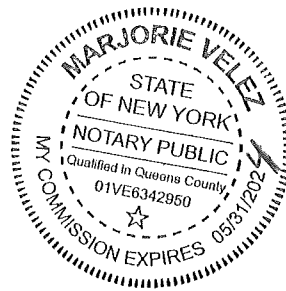
Vicky Ward

Sworn to and subscribed before me
this 30 day of September, 2021



Notary Public for State of New York
My Commission expires: May 31, 2024

COUNTY OF NEW YORK



STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT) FOURTEENTH JUDICIAL CIRCUIT
CASE NO.: 2019-CP-10-06115

Renee S. Beach, as P.R. of the Estate of)
Mallory Beach,) [PENDING IN HAMPTON COUNTY]

Plaintiff,)

vs.)

Gregory M. Parker, Inc., et al.)

Defendants.)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached **Affidavit of Non-Party Vicky Ward** has this day been served upon the person(s) named below via electronic mail and by mailing a copy of same in the United States Mail with sufficient postage properly affixed thereto to:

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ATTORNEYS FOR DEFENDANTS RICHARD ALEXANDER MURDAUGH AND
RICHARD ALEXANDER MURDAUGH, JR.

The Honorable Daniel Dewitt Hall
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MOUNT PLEASANT, SC
September 30, 2021