

<p>STATE OF SOUTH CAROLINA COUNTY OF HAMPTON</p> <p>MANUEL SANTIS-CRISTIANI, Plaintiff,</p> <p>v.</p> <p>RICHARD ALEXANDER “Alex” MURDAUGH, RONNIE L. CROSBY, WILLIAM F. BARNES, III, RUSSELL LAFFITTE, PALMETTO STATE BANK, AND PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK, P.A., Defendants.</p>	<p>IN THE COURT OF COMMON PLEAS</p> <p>Case No.: 2022-CP-25-00285</p> <p>PLAINTIFF’S RESPONSES TO DEFENDANTS PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK, P.A., RONNIE L. CROSBY, AND WILLIAM F. BARNES FIRST SET OF INTERROGATORIES TO PLAINTIFF</p>
<p>Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Ronnie L. Crosby, and William F. Barnes, Interpleader Plaintiffs,</p> <p>v.</p> <p>Manuel Santis-Cristiani, Richard Alexander “Alex” Murdaugh, Russell Laffitte, Palmetto State Bank, and Medical University Hospital Authority d/b/a Medical University of South Carolina, Interpleader Defendants.</p>	

TO: GLENN WALTERS, ESQUIRE, ATTORNEY FOR PLAINTIFF MANUEL SANTIS-CRISTIANI:

Pursuant to Rule 33 of the South Carolina Rules of Civil Procedure, the undersigned attorney for Plaintiff provides the following responses to DEFENDANTS PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK, P.A., RONNIE L. CROSBY, AND WILLIAM F. BARNES FIRST SET OF INTERROGATORIES TO PLAINTIFF:

RESPONSES TO DEFENDANTS' INTERROGATORIES

1. Identify each person who provided information or otherwise consulted or assisted in connection with providing answers to the Interrogatories and identify the specific Interrogatories for which each such person supplied information or was consulted or assisted, the nature of any such consultation or assistance, and whether the information supplied was based on personal knowledge.

Answer: Blanca Simpson and Manuel Santis Cristiani provided information in connection with providing answers to all the interrogatories based on their personal knowledge. Each person aided with all the interrogatories contained herein. Additionally, Plaintiff's attorneys also assisted with the responses to these interrogatories.

2. Give the names and addresses of persons known to the parties or counsel to be witnesses concerning the facts of the case and set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

**Answer: Manuel Santis Cristiani
LOC Santo Doming Corona S/N
LOC Santo Domingo Corona 30187
LOC Margaritas, Chiapos Mexico
No written or recorded statement**

**Nick Gladd
No written or recorded statement**

**Andrew Pride (By phone)
No written or recorded statement.**

Alex Murdaugh
Lieber Correctional Institute
Transcript of Murder Trial of Richard Alexander, Direct
and Cross. Possession: Trial Court Reporter.

William Barnes, III.
Address unknown
Affidavit of William F. Barnes, III,
Dated 10/20/2022; filed in the action on 10/21/2022

Gordon Spurill
Address unknown
No written or recorded statement.

Patrick Sugg, Esquire
Address unknown
No written or recorded statement.

Blanca Simpson
94 Wescott Street
Brunson, SC 29911
No written or recorded statement.

Russell Laffitte
Address unknown
Statements at Federal Bond Hearing, dated September 6,
2022, before Judge Molly H. Cherry. Doc. No. 28.

Norris Lightsey Laffitte.
Address Unknown
Testimony in the federal trial of Russell LaFitte.
Doc No. 35.

Ronnie L. Crosby
Address Unknown
Transcript of Trial Testimony during federal trial of
Russell LaFFitte. Doc. No. 22.
Also statements to Post and Courier reporters, Doc. No.
23.

Jeanne Seckinger, CPA
Address Unknown
Transcript of Trial Testimony during Murder trial.
And Copy of Trial Testimony during the federal trial
Of Russell LaFFitte. Doc No. 30.

**Chris Wilson
Address Unknown.
Statement made to Reporter Eric Levenson.
Doc. No. 24
Also Trial Transcript of his testimony at the Murder Trial
of Richard Alexander Murdaugh. Transcript in
possession of court reporter.**

**Lee D. Cope
Address Unknown
Affidavit of Lee D. Cope, dated 10/21/2022, filed
10/21/2022.**

**Plaintiff is also a witness. No statements that are
discoverable.**

3. State the name, address, and telephone number of each person who has investigated the facts of this case for or on behalf of Plaintiff and for each person, state the nature of the investigation.

ANSWER: Plaintiff's attorney of record have investigated the facts of this case on behalf of the Plaintiff. As to the nature of the investigation, such information is objectionable on attorney-s work product privilege.

4. Describe all correspondence, including text messages, notes, emails, telephone messages, memoranda, or other communication of any kind, whether recorded, written, or oral, related to the settlement of Civil Action 2011-CP-15-764 (the "Underlying Lawsuit").

ANSWER: Any such documents are known by the Defendants', and such documents were in possession of the Defendants, including Russell Laffitte.

5. Describe any funds recovered from the Underlying Lawsuit, including the amount(s), date(s) received, and manner(s) of receipt.

6. Describe all attempts to contact the Defendants in this lawsuit about the settlement of the Underlying Lawsuit consistent with the statement by Plaintiff's counsel that the Plaintiff "has demanded over and over again, give me an accounting." Hearing Transcript, December 1, 2022, p. 36, 19 – 20.

ANSWER: Plaintiff made no such attempts, and no such attempts were necessary in light of the existing facts. When Blanca Simpson was in the bank making with Russell Laffitte in or about November 2016, she saw the settlement papers which revealed that the amount recovered for Plaintiff greatly exceeded the amount that was being sent to the Plaintiff. Plaintiff became aware of the fraud once the financial investigation surrounding Richard Alexander Murdaugh started in 2021. Until the criminal investigations were commenced, Plaintiff was not aware that \$70,000.00 of his money had been misappropriated. To this day, Plaintiff is not aware of the total amount of money that was received. The settlement documents are going to be subpoenaed from the defense attorneys involved in the settlement. At that time, this interrogatory will be supplemented. Again, Blanca Simpson hired counsel with the Power of Attorney provided by Plaintiff. Like Defendants not contacting Plaintiff concerning his money, Plaintiff did not contact them concerning his pursuit of justice. The mere fact that Ms. Simpson will testify under oath that the amount that she saw on the papers possessed by Mr. Laffitte was greater than the amount sent was sufficient, standing alone, to initiate this lawsuit—there was no requirement under the laws of this state to contact the Defendants under the prevailing circumstances—including the indictment of Richard Alexander Murdaugh for stealing Plaintiff's \$70,000.00.

7. Please state all residential addresses of the Plaintiff from the time of the filing of the Underlying Lawsuit to the present, and the dates during which Plaintiff resided at each address.

ANSWER: Plaintiff objects to this interrogatory and will provide the information under seal later. At least two individuals associated with the fraud conspiracy have died. Based on the advice of counsel, Plaintiff will provide this information on the assurance from Counsel that such information will be protected.

8. List the names of any expert witnesses whom the plaintiff intends to use at the trial of this case and include a statement of the facts and documents which support each expert's opinion(s).

**Answer: Desa Ballard
236 State Street,
West Columbia, SC 29169
Plaintiff reserves the right to supplement additional
information as this discovery continues.**

Additionally, Plaintiff will move to amend its pleading to include a RICO action. An expert will be retained to support this cause of action and this answer will be supplemented.

9. If the Plaintiff or someone acting on Plaintiff's behalf has had conversations with any employee of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A. between December 2008 and the present, please state when, where, and with whom such conversations were had.

ANSWER: Blanca Simpson has had conversations with employees of PMPED. The exact nature of such conversations is unknown. Plaintiff intends to take the deposition of Ms. Simpson, and this answer will be supplemented accordingly.

10. State with specificity the amount of Plaintiff's outstanding debt to MUSC that remains unpaid at present. If any payment were made to MUSC for Plaintiff's medical debt, please state such payments here.

ANSWER: First, MUSC has a judgment against the Plaintiff. Defendants are aware of this judgment. Plaintiff will contest any debt previously owed by MUSC. Plaintiff is not aware of the amount that MUSC claims as a debt. Once this paperwork is received, Plaintiff will supplement this answer. No payments have been made to MUSC, and no payments are planned.

11. Identify all facts and evidence which support or refute the allegations of Paragraph 31 of the Complaint that Defendants "Barnes, Crosby, and PMPED aided and abetted Defendants Laffitte and Palmetto in the breach of their fiduciary duties."

ANSWER:

1. The facts will show that Johnny Parker was receiving payments from Russell Laffitte that was part of the criminal conspiracy between Richard Alexander Murdaugh. He received at least two payments from the stolen money. This conduct facilitate the criminal conspiracy between Richard Alexander Murdaugh and Russell Laffitte. Johnny Parker is a significant member of PMPED. His conduct of receiving stolen funds from the criminal conspiracy is imputed to PMPED, and such conduct aided and abetted Defendants' breach of their fiduciary duties.

2. Barnes and Crosby were members of PMPED. They breach their duties as attorneys, as explained by the affidavit testimony of Desa Ballard. Moreover, the facts will show that these two attorneys of record in Plaintiff's accident case did absolutely nothing to ensure that appropriate accounting and disbursement of funds were made in the settlement case. The evidence will show that Richard Alexander Murdaugh and Mr.

Laffitte started the criminal conspiracy as early as 2013 and possibly 2011. See, the trial Norris Lightsey's trial testimony n the Russell Laffitte criminal trial. Barnes and Crosby's inaction in fulfilling their attorney-client responsibilities to the Plaintiff aided and abetted the criminal conspiracy between Murdaugh and Laffite, and their inaction further aided and abetted Laffitte in violating the fiduciary obligations that he had to Plaintiff. Barnes and Crosby's inaction is imputable to PMPED.

3. It took over 10 years for the PMPED firm, Crosby, and Barnes to discover that Richard Alexander Murdaugh was stealing clients funds, and this discovery was made only because of external investigations. Plaintiff's \$70,000.00 was stolen in or about 2016. There is a requirement for PMPED, Crosby, and Barnes to reconcile their trust accounts on a monthly basis. The failed to carry out this reconciliation and didn't even discover that the funds were stolen until 2021 or thereabout. This inaction aided and abetted Palmetto and Laffitte to breach their fiduciary obligation owed to the Plaintiff. As a matter of fact, had PMPED and its attorney, Murdaugh, Crosby, and Barnes, reconciled their trust account in 2011 they would have discovered that Murdaugh was stealing funds.

4. Richard Alexander Murdaugh's father was also receiving large financial payoffs from Russell Laffitte. This conduct aided and abetted Palmetto and Laffitte's breach of its fiduciary obligations to the Plaintiff.

12. If you contend that Defendants Barnes, Crosby, and PMPED aided and abetted Defendants Laffitte and Palmetto in the breach of their fiduciary duties, identify all evidence that Defendants Barnes, Crosby, and/or PMPED had actual knowledge of the alleged breach of fiduciary duty.

ANSWER: The answer to this Interrogatory is the same as the answer provided to Interrogatory 12 above, the same being incorporated by reference as the answer to this interrogatory.

13. If you contend that Defendants Barnes, Crosby, and PMPED participated in a civil conspiracy, identify all evidence that Defendants Barnes, Crosby, and/or PMPED had an agreement with anyone else to carry out an unlawful act or to carry out a lawful act in an unlawful way.

ANSWER: The answer to this Interrogatory is the same as the answer provided to Interrogatory 12 above, the same being incorporated by reference as the answer to this interrogatory.

14. Identify the unnamed third parties who participated in the alleged conspiracy set forth in Paragraph 37 of the Complaint.

ANSWER: The unnamed third parties are as follows:

- a. Maggie Murdaugh, who received substantial financial rewards from the criminal conspiracy.
- b. Buster Murdaugh, who received substantial financial reward from the criminal conspiracy.
- c. Russell Laffitte
- d. Unknown Board Members of Palmetto Saving Bank.
- e. Chris Wilson
- f. All attorneys of PMPED during the relevant times.

15. Specifically state each fact and identify each document upon which the Plaintiff relied to support the allegations in Paragraph 43 of the Complaint that the Defendants have unlawfully converted the Plaintiff's settlement funds from Civil Action No.: 2011-CP-15-764.

ANSWER: All documents provided in response to the Defendant's request for production of documents, to wit, the following documents:

- a. Answer of Defendant's Palmetto State Bank to Plaintiff's Complaint. Filed December 18, 2022. Doc. No. 12.**
- b. Indictment of Richard "Alex" Murdaugh, Case No. 2021 GS-47-31, filed in the Case by Plaintiff on December 29, 2022. Doc. No. 13.**
- c. Transcript of Hearing in this case held on December 1, 2022. Doc. No. 14.**
- d. Answer in this case filed by PMPED, dated January 19, 2023. Doc. No. 15.**
- e. Answer of Russell L. Laffitte, dated February 3, 2023. Doc. No. 16.**
- f. Affidavit of Desa Ballard, including the Supplemental Affidavit of Desa Ball. Doc. No. 17.**
- g. Supplemental Affidavit of Desa Ballard. Doc. No. 18.**
- h. Settlement Disbursement Sheet provided by Defendants during the December 1, 2022 Hearing.**
- i. Copy of Trial Transcript of Richard Alexander Murdaugh during his criminal trial for murder.**

- j. Copy of Trial Transcript of Testimony of Jeanne Seckinger during the Criminal Trial of Richard for murder.**
- k. Copy of Trial Transcript of Testimony of Mark Ball during the Criminal Trial of Richard for murder.**
- l. Trial Transcript of testimony of Ronnie Crosby during the federal trial of Russell Laffitte. Doc. No. 22.**
- m. Post and Courier Newspaper Article, dated November 10, 2022, entitled “Former Murdaugh law partner testifies only bank could see funds diverted”, written by Thad Moore (tmoore@postandcourier.com and Jocelyn Grzeszczak (jgrzeszczak@postandcourier.com). Doc. No. 23.**
- n. CNN Article by Eric Levenson dated February 9, 2023, entitled “Best Friend testifies Alex Murdaugh admitted to drug addiction and stealing money [quoting Chris Wilson]”. Doc. No. 24.**
- o. Trial transcript of Ronnie L. Crosby during criminal trial of Richard Alexander Murdaugh for murder. Doc. No. 25.**
- p. Transcript Vol IX from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 26.**
- q. Transcript Vol VII from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 27.**
- r. Transcript of federal Bonding hearing for Russell Laffitte, dated September 6, 2022, before Molly H. Cherry. Doc. No. 28.**
- s. Transcript Vol III from Russell Laffitte’s federal trial in case No. 9:22-cr-00658. Doc. No. 29.**

- t. **Transcript Vol II from Russell Laffitte's federal trial in case No. 9:22-cr-00658. Doc. No. 30.**
- u. **Transcript Vol IV from Russell Laffitte's federal trial in case No. 9:22-cr-00658. Doc. No. 31.**
- v. **Transcript Vol V from Russell Laffitte's federal trial in case No. 9:22-cr-00658. Doc. No. 32.**
- w. **Transcript Vol VI from Russell Laffitte's federal trial in case No. 9:22-cr-00658. Doc. No. 33.**
- x. **Transcript Vol I from Russell Laffitte's federal trial in case No. 9:22-cr-00658. Doc. No. 35.**
- y. **POA signed by Plaintiff to Russell LaFFitte. Possession: Defendant Law Firm and or Russell LaFFitte.**

And, All documents in the personal injury file as possessed by the Defendant Law Firm. Possession: PMPED Law Firm.

16. Set forth an itemized statement of all damages, exclusive of pain and suffering, claimed to have been sustained by the Plaintiff in this lawsuit.

Answer: The exact amount of Plaintiff's damages are unknown at this time because it cannot be determined exactly how much the law firm retrieved on the Plaintiff's behalf from the personal injury lawsuit. At this point, certainly the \$70,000 is damages, plus the intangible emotional damages in excess of \$400,000.00. Additionally, punitive damages cannot be measured with certainty at this point because we do not know the net worth of the Defendants.

The following interrogatories shall be deemed to continue from the time of service until the time of the trial of the case so that information sought which comes to the knowledge of the Plaintiff or their representative or attorney, after answers to interrogatories have been submitted, shall be transmitted to Defendants' attorneys.

Dated: July 25, 2023

At Orangeburg, SC

s/ *Glenn Walters, Sr.*
GLENN WALTERS, Sr., Esquire
1910 Russell Street (29115)
Post Office Box 1346
Orangeburg, SC 29116
Phone: 803 531-8844
Fax: 803 531-3628

Lead Attorney for Plaintiff

Co-Counsel:

s/ *Korey L. Williams*
Korey L. Williams, Esquire
Law Office of Korey L. Williams & Associates
450 Summers Avenue (29115)
Post Office Box 39
Orangeburg, SC 29116
(803) 878.3588
(803) 878.3718 (fax)
SC Bar No.: 76219

<p>STATE OF SOUTH CAROLINA</p> <p>COUNTY OF HAMPTON</p> <p>MANUEL SANTIS-CRISTIANI,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>RICHARD ALEXANDER “Alex” MURDAUGH, RONNIE L. CROSBY, WILLIAM F. BARNES, III, RUSSELL LAFFITTE, PALMETTO STATE BANK, AND PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK, P.A.,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;">IN THE COURT OF COMMON PLEAS</p> <p style="text-align: center;">Case No.: 2022-CP-25-00285</p> <p style="text-align: center;">PROOF OF SERVICE</p>
<p>Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Ronnie L. Crosby, and William F. Barnes,</p> <p style="text-align: center;">Interpleader Plaintiffs,</p> <p>v.</p> <p>Manuel Santis-Cristiani, Richard Alexander “Alex” Murdaugh, Russell Laffitte, Palmetto State Bank, and Medical University Hospital Authority d/b/a Medical University of South Carolina,</p> <p style="text-align: center;">Interpleader Defendants.</p>	

I, Glenn Walters, Sr., certify that I have caused a copy of foregoing responses to be served on **Wallace K. Lightsey, Esquire**, addressed as follows: Post Office Box 728, Greenville, SC 29602-0728; Email: wlightsey@wyche.com, on July 26th 2023, with postage prepaid, with return address clearly visible. In the same manner, I also caused the other attorneys of record to be served the foregoing responses:

Phillip Donald Barber PO Box 1090 Columbia SC 29202

Wallace K. Lightsey , PO Box 728 Greenville SC 29602

James Hunter May, PO Box 12247 Columbia SC 29211

Jessica L. Monsell, 200 E. Broad Street Suite 400 Greenville SC 29601

Matthew Terry Richardson, PO Box 12247 Columbia SC 29211

James Whittington Clement, PO Box 22167 Charleston SC 29413

Margaret Nicole Fox, PO Box 999 Columbia SC 29202

Thomas P. Gressette, Jr. PO Box 22167 Charleston SC 29413

Griffin, James Mixon PO Box 999 Columbia SC 29202

Andrew R. Hand, 1410 Laurel Street PO Box 1090 (29202) Columbia SC 29201

Richard A. Harpootlian, Richard A. Harpootlian, P.A. PO Box 1090 Columbia SC 29202

C. Scott Masel, PO Box 808 Myrtle Beach SC 29578

Korey L. Williams, PO Box 39 Orangeburg SC 29116

Dated: July 25th, 2023

/s/ Glenn Walters, Sr.
GLENN WALTERS, Sr., Esquire