

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

IN RE:

v.

A MATTER UNDER INVESTIGATION
BY GRAND JURY NUMBER 1

IN RE:

TONY B. POUGH, JOSEPH BRUNSON
and TIMOTHY McQUEEN,

Movants.

AFFIDAVIT OF CHARLENE SIMS

NO. 3:07-mc-135

The undersigned affiant, after being duly sworn upon her oath, deposes and says as follows:


1. I am Charlene Sims; I am over the age of twenty-one (21) years; and, I make this statement of my own personal knowledge.
2. I have worked in the Law Office of Hemphill P. Pride II for a period of one (1) year eleven (11) months.
3. One of my primary responsibilities is to notify clients via United States Mail and/or telephone of forthcoming court appearances, etc.
4. On November 16, 2007, I notified Messrs. Tony Pough, Joseph Brunson, and Timothy McQueen via United States Mail of the scheduled show cause hearing on Wednesday, November 28, 2007, at 9:30 a.m. and, at which time I enclosed a copy of the Order signed by the Honorable Margaret B. Seymour mandating the appearance of said Movants at same. [See copy of letter attached hereto.]
5. On November 16, 2007, I left detailed messages on the mobile phones of said Movants and, at the homes of Messrs. Joseph Brunson and Timothy McQueen, I spoke with Mr. Tony Pough who was informed of the information stated in paragraph 4.

6. Additionally, Mr. Pough stated that he would confer with Messrs. Joseph Brunson and Timothy McQueen to discuss who would visit the Law Office of Hemphill P. Pride II on November 17, 2007 to retrieve documents filed and submitted by L. Walter Tollison III, Esq. in regard to the Motion for Contempt and To Dismiss Bankruptcy. However, no one came to retrieve said documents.

The above and foregoing is true and complete to the best of my knowledge and recollection.


Charlene Sims

SWORN to and subscribed before me
this 28 day of November 2007


Notary Public for South Carolina
My Commission Expires: 10-28-2010

LAW OFFICE
OF
HEMPHILL P. PRIDE II

1401 GREGG STREET
COLUMBIA, S C 29201
TELEPHONE (803) 256-8015
TELE-COPIER (803) 771-8014

MAILING ADDRESS
P.O. BOX 4529
COLUMBIA, SC 29240

November 16, 2007

Mr. Timothy McQueen
44 Ravenglass Way
Blythewood, South Carolina 29016

Mr. Joseph Brunson
209 Raintree Lane
Hopkins, South Carolina 29061

Mr. Tony Pough
1907 Henderson Street
Columbia, South Carolina 29201

RE: A Matter Under Investigation by Grand Jury #1

Dear Messrs. McQueen, Brunson and Pough:

Please be advised that you are Ordered by the Honorable Margaret B. Seymour, United States District Judge, to be present at a show cause hearing in the above-referenced matter scheduled for Wednesday, November 28, 2007 at 9:30 a.m. [Copy of Order enclosed.] The show cause hearing will be held at the following location, to wit:

MATTHEW J. PERRY, JR. COURTHOUSE
901 Richland Street
Columbia, South Carolina 29201

You should arrange to meet me in Court on November 28 at 9:00 a.m. Meanwhile, please call the office to confirm receipt of this letter as your cooperation is greatly appreciated.

Sincerely,



Hemphill P. Pride II

HPPII/cs

Enclosure