



Will Grove
Thirteenth Judicial Circuit, Seat 3
Amendment to Personal Data Questionnaire
Originally Submitted, July 15, 2020

November 12, 2020

Erin B. Crawford
Chief Counsel
Judicial Merit Selection Commission
Post Office Box 142
Columbia, SC 29202

RE: Personal Data Questionnaire Supplement

Dear Ms. Crawford:

Please accept this supplement to my Judicial Merit Selection Commission Personal Data Questionnaire, to clarify and amend responses to questions 36, 39, and an addendum to question 52.

Please strike my previous answer and replace it with the following response to Question 36:

36. Itemize (by amount, type, and date) all expenditures, other than those for travel and room and board, made by you, or on your behalf in furtherance of your candidacy for the position you seek. If you have spent over \$100, have you reported your expenditures to the House and Senate Ethics Committees?

Postage: \$90.20 on November 11, 2020

I purchased postage to mail letters to members of the General Assembly, other than those who serve on the JMSC, to introduce myself and announce my candidacy.

Please strike my previous answer and replace it with the following response to Question 39:

39. Describe any financial arrangements or business relationships you have, or have had in the past, that could constitute or result in a possible conflict of interest in the position you seek or currently hold. Explain how you would resolve any potential conflict of interest.

My wife, Kathleen Lyall Grove, is an income partner practicing exclusively in workers' compensation defense in the Greenville, SC office of MGC Law. We share finances, so some of our household income is derived from MGC Law, which maintains a workers' compensation practice as well as a civil litigation defense practice. If a matter came before me and one of the parties was represented by MGC Law, I would disclose this information and invite a discussion as to whether either party believed a legitimate conflict of interest existed.

Please strike my previous answer and replace it with the following response to Question 47:

47. Have you ever been sued by a client? Have you ever been a named party (personally or professionally) in or had a pecuniary interest in any civil or criminal proceedings? If so, give details, including, but not limited to, dates, and resolutions.

Since the filing of my original application, I have been made aware of one case where I was named as a defendant:

1) 4:14-cv-00012-MGL:

Derrick L. Jones v. Daniel Shipp, Richard Jones, Mr. Marcus Woodson, Mr. William Grove, Mr. Johnny Sapp, Pam Johnson, James Samuel

Filed: 12/23/2013
Dismissed: 03/19/2014

Plaintiff Derrick L. Jones filed the above case on December 23, 2013 in The United States District Court for the District of South Carolina. The case was dismissed without prejudice and without service of process by The Honorable Mary G. Lewis on March 19, 2014.

Please supplement my previous answer with the following addition to Question 52:

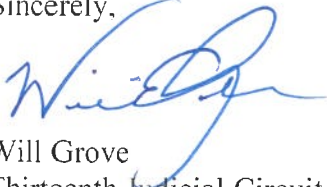
52. Have you requested any third parties to contact members of the General Assembly on your behalf before the final and formal screening report has been released? Describe the campaigning you have done for this election and include a list of those individuals you have asked to campaign on your behalf and, to the best of your knowledge, those who have campaigned for you on their own initiative.

In addition to the answer in my original submission, on November 12, 2020, I mailed a letter to the members of the General Assembly, save for those currently serving on the JMASC, introducing myself and announcing my candidacy. In this communication, I

limited my comments to be introductory in nature and I have not sought, nor received, a pledge or commitment from any member of the General Assembly.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Will Grove". The signature is fluid and cursive, with a large initial "W" and a long, sweeping tail.

Will Grove
Thirteenth Judicial Circuit
Candidate, Seat 3

Enclosures