



## PERSONAL DATA QUESTIONNAIRE

Amendment to question #47 (original answer submitted July 20, 2018)

I was named as a Defendant in a federal law suit brought pro se by a South Carolina inmate, captioned Clark D. Thomas v. Charleston County, et.al., Civil Action No. 2:17-cv-01958-MBS-MGB. There are 43 named defendants, including Judges who have apparently ruled against Mr. Clark at some point in time. The civil action was filed July 21, 2017. The Complaint appears to be 233 pages. I have attached the email from SC Court Administration Director Tonnya Kohn dated November 15, 2017, which notified myself and several other Judges of the existence of the suit (I still do not recall ever being served), with a note that the SC Attorney General's office would be requested to represent the SCJD defendants named in the suit. I thought that the suit had been dismissed or summary judgment granted, and had heard nothing since Director Kuhn's email. After my JMSC attorney interview with Charles Appleby, he noted the existence of the suit and that I did not include it as part of my answer to Question #47 on page 13 of my PDQ. I had simply forgotten about it and assumed it was dismissed. I followed up with SCJD Director Kuhn and she responded by email October 30, 2018, that there was a recommendation to dismiss but that the Judge had not yet ruled. She also noted nothing has been filed since February 2018 and continues to be monitored for developments.

I've attached a copy of the 2 emails with Director Kuhn, the civil suit page 1 which reflects the case heading, and a copy of page 121 of the suit so that you can see the entire complaint is 233 pages. If you should need a copy of the entire complaint, please let me know but it would be cumbersome to produce the copies.

My recollection is that several years ago I heard motions as part of a private Family Court action in Charleston County involving Mr. Thomas, when I was assigned as a visiting Judge. The motions took approximately 2 hours, Mr. Clark represented himself, and he was already incarcerated on charges relating to the divorce or separation. I recall several judges had already been conflicted out of the case because Mr. Clark had made complaints against the resident judges and so visiting judges were being assigned his motions. My only involvement with Mr. Clark was in my capacity as a Family Court Judge presiding over a case in which he was a Party.

I hope this will provide the information you need as a correction to my JMSC PDQ Question #47.

Date 11/6/18 Signature 