ELECTRONICALLY FILED - 2026 Jan 12 11:45 AM - CHARLESTON - COMMON PLEAS - CASE#2025CP1003124

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Alexis Berg, Plaintiff, vs. Patrick Bryant, John Osborne, Eric Bowman, Pommer Group LLC, Assignment Desk Works LLC and GLT2, LLC, Defendants.	IN THE COURT OF COMMON PLEAS FOR THE NINTH JUDICIAL CIRCUIT C/A NO.: 2025-CP-10-03124 **DEFENDANTS PATRICK BRYANT'S AND ERIC BOWMAN'S ORDER TO SHOW CAUSE AND MOTION FOR CIVIL CONTEMPT AGAINST NANCY MACE BASED ON HER REPEATED VIOLATIONS OF THE COURT'S NOVEMBER 26, 2025 GAG ORDER**
Patrick Bryant, Third Party Plaintiff, vs. Nancy Ruth Mace and Melissa Britton, Third Party Defendants.	

Patrick Bryant ("Bryant") and Eric Bowman ("Bowman"), through their respective counsel, hereby move for an Order to Show Cause holding Third Party Defendant Nancy Ruth Mace in civil contempt for repeated violations of this Court's November 26, 2025 Gag Order and state as follows:

I. NANCY MACE'S PRIOR DEPLORABLE CONDUCT TOWARDS PARTIES AND THEIR COUNSEL

1. Since February 10, 2025, Nancy Mace has repeatedly disparaged and defamed Patrick Bryant, Eric Bowman and Jon Osborne by calling them "rapists" "criminals" and

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"predators" during Congressional speeches and through her social media platforms (including her official Congressional accounts).

2. Despite no evidence of any wrongdoing, Mace continued her deplorable conduct in speeches, and on social media up through the filing of the First Amended Complaint dated June 10, 2025. She even escalated her defamatory remarks towards Bryant calling him a pedophile and serial rapist.

3. On November 6, 2025, Bryant filed a Third-Party Complaint against Nancy Mace, based in part on her defamatory remarks, in addition to claims for her theft and conversion of his cell phone (which she admitted to accessing a private, secure folder on his cell phone in her responses to Bryant's Request for Admissions).

4. Mace, who had not yet retained an attorney, continued her deplorable and unprofessional conduct, but this time directed it at Bryant's attorney. By way of example:

- On November 14, 2025, Mace lashed out at Bryant's counsel, Nosizi Ralephata who was simply trying to confirm if Mace had counsel, in three separate e-mails, by stating:

> *…Cute but also careless Nosizi. I hope Bryant is paying you well. And I hope he pays out his sanctions in court soon. Rape Victim Jane Doe and I are patiently waiting.*
>
> *What's most fucked up about this is you have a rapist, suing rape victims. Sick. Disgusting. Gross. Also, note how I did not say "alleged" in my previous sentence. You guys are completely cooked.*
>
> *You poked the wrong bear*
>
> ***
>
> *If you'd like to see what I really think of alleged rapist Bryant - please continue to follow me on all of my social media accounts.*
>
> *I'll see you in court.*

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CNM

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No, you opened this pandora's box and you can deal with the consequences. I will fight like hell to protect women and girls with every fiber of my being. It's why I signed the Epstein discharge petition to my own personal and professional detriment. Wait until you hear about the possible CHILD SEXUAL ABUSE MATERIAL on your client's phone (allegedly).

Your process server tried to force his way into my federal office this morning. Threatened to "throw" paperwork at me at a public event. Then denied it. And mind you, I've already been physically assaulted by your client on 3 separate occasions.

FUCK YOU AND EVERY PEDOPHILE AND RAPIST YOU'VE EVER REPRESENTED.

CNM

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- Then, only two days later on November 16, 2025, Mace threatened

Bryant's other counsel, Matthew Gallo and took a malicious jab at Mr. Gallo's deceased mother:

Matt,

"Your mom."

That's my response to your continued harassment of a sitting Member of Congress and victim of your client's continued abuse. Keep it up and see what happens. That's a promise, not a threat.

Sincerely,

CNM

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5. These are the actions of a sitting Congressman. Mace then proceeded to boast about her unhinged conduct on "X" claiming she "threatened Bryant's attorneys."

II. THE COURT'S GAG ORDER, EXTENSION, AND NOTICE

6. On November 17, 2025, Bryant filed a Temporary Restraining Order to stop Mace's profanity filled threats and public smears against Bryant, Bowman and Osborne.

7. On November 26, 2025, this Court entered a written Gag Order in this action. The Gag Order was circulated by Judge Hocker, via e-mail, to all counsel of record on November 26, 2025 at 2:23 p.m.

8. The Gag Order directs counsel to provide their clients with a copy of the Order. Counsel for Mace, Craig Brown was copied on the e-mail and therefore received the Gag Order. Thus, Mace and her agents had actual notice of the Gag Order.

9. The Gag Order applies to "all of the above parties" including Nance Mace, and to their agents, representatives and attorneys.

10. The Gag Order sought to "[e]nsure that every party to this case receives a fair, just, and reasonable resolution to their respective claims, interests and concerns."

11. The Gag Order specifically prohibits:

> **a. Making or publishing any comment about any aspect of this case (other than attorney client communications) via oral, written, social media, text or any other form of communication;**
>
> **b. Making or publishing any comment about any party or attorney to this case or anyone connected to this case (other than attorney client communications) via oral, written, social media, text or any other form of communication; and**
>
> **c. Publishing, transmitting, posting or sharing any documents, videos, photographs or any other materials related to any aspect of this case and or any party and or attorney and or any person connected to this case (other than attorney client communications).**

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A true and correct copy of the Gag Order is attached as **Exhibit 1**.

12. By subsequent email instructions to counsel dated December 18, 2025, the Court extended the Gag Order. A copy of Judge Hocker's December 18 e-mail is attached as **Exhibit 2**.

13. During the December 30 hearing, and after the Court was advised of Mace's continuing public statements, the Court stated on the record that it would consider contempt proceedings relating to violations of the Gag Order upon the filing of an appropriate motion. This Motion follows.

III. MACE'S BLATANT VIOLATIONS OF THE GAG ORDER

14. After entry and extension of the Gag Order, and during its effective period, Mace has repeatedly made and amplified public statements about this case, about parties to this case, and about persons connected to this case, and has published related video and email content, in direct violation of the Gag Order.

15. *First*, on November 26, 2025, at 6:43 p.m.[1], Mace, from her verified X account ***@RepNancyMace***, publicly responded to a post reporting that "Eric Bowman has been granted bond on his domestic violence and harassment charges, 60k each" by stating: "*Not nearly enough. Very concerned for the safety of his victims. Keeping them in my prayers tonight."*

16. The post names Eric Bowman, labels unnamed persons "his victims," and comments on alleged criminal conduct that is the subject of this matter. A true and correct copy of Mace's X post is attached as **Exhibit 3.**

[1] Notably, it only took Mace less than 4-hours to violate the Court's Gag Order.

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17. *Second*, on November 28, 2025, at approximately 11:00 a.m., from the same verified @RepNancyMace account, Mace posted: "IMPEACH ALL CORRUPT JUDGES" and, in the same thread: "Especially including those in South Carolina SPECIFICALLY."

18. It may be reasonably inferred that Mace is criticizing the same judges she criticized only days earlier when naming Mr. Bowman. A true and correct copy of Mace's X post is attached as **Exhibit 4**.

19. *Third*, after the Court extended the Gag Order, counsel for Eric Bowman, Robert Merting, emailed the Court to report that Mace had posted a video on Instagram from @repnancymace on December 27, 2025 at 10:00 pm in which Mace referred to Eric Bowman by his full name, called him a "wife beater," and associated his name with "pedophiles," implying criminal conduct that has not been alleged in this litigation. Counsel's email, dated December 29, 2025 includes a link to the video. A true and correct copy of Mr. Merting's email is attached as **Exhibit 5,** and a copy of the Instagram video and a transcript of the same are attached as **Exhibits 6 and 7**[2].

20. *Fourth*, on December 1, 2025, Mace's Congressional office sent a mass email newsletter titled "Rep. Nancy Mace says 2 more women accuse her ex-fiancé of abuse." The newsletter states, among other things, that:

a. "Two additional women have come forward to report alleged abuse by Patrick Bryant," bringing renewed urgency to ongoing investigations and the need for potential victims to seek help;

b. "The allegations against Bryant include purported child sexual exploitation material, multiple rape accusations, and hidden cameras used to film women without their knowledge or consent;"

[2] A copy of Instagram video will be downloaded to a thumb drive and sent via FedEx to Your Honor's attention.

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c. "Patrick Bryant and his attorneys continue to harass his victims for doing what's right," followed by, "I WILL NOT be silenced. I will fight for you;" and

d. Urges anyone who believes they may have been victimized by Patrick Bryant or who has information relevant to "ongoing investigations" to contact Ms. Mace's federal office, which will provide contact information for law enforcement investigators, including SLED, connect victims with resources, and "protect" those who come forward.

A true and correct copy of this newsletter is attached as **Exhibit 8.**

21. Mace will argue that this newsletter was sent in furtherance of her official Congressional duties and her first amendment rights cannot be infringed. This argument is baseless as the Gag Order specifically prohibits identifying and disparaging the parties and their counsel. Additionally, Mace's theft and conversion of Bryant's phone were not performed in connection with *any* Congressional duties, and she certainly does not have First Amendment rights for such unlawful actions.

22. In sum, Exhibits 3-8 identify Patrick Bryant and/or Eric Bowman by name, accuse them of serious criminal conduct that overlaps with issues in this case, accuse Patrick Bryant and his attorneys of "harassing" alleged victims, solicit additional complainants and witnesses concerning Patrick Bryant, and attack judges "including those in South Carolina specifically" while the Gag Order was in effect.

23. Mace did not stop there. After the December 30 hearing in which the Court extended the Gag Order, Mace, from her verified @RepNancyMace account, again amplified the same video in which she refers to Eric Bowman as a "wife beater" and links him to "p*dophiles" by publishing a new, pinned X post that states, "When your state Attorney General drops nearly every case and or charge against p*dos, that's when you know your state is a p*dophile paradise,"

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while tweeting her December 27, 2025 video post. This post was published on December 31, 2025, at approximately 4:29 p.m.

24. This new tweet, which is pinned at the top of her profile and has been viewed more than 20,000 times, republished and further disseminated the same video content during the effective period of the Gag Order. A true and correct copy of this pinned post is attached as **Exhibit 9**.

25. Each of the communications described above is a "comment about" parties, attorneys, and/or persons connected to this case, or about aspects of this case and the underlying allegations and is published through social media or email to the general public. Each communication therefore falls squarely within the conduct prohibited by the Gag Order.

26. Mace has persisted in this conduct despite the entry of the Gag Order, the Court's email extending it, counsel's direct email to the Court identifying a specific violation, and the Court's statement at the December 30 hearing that it would consider contempt proceedings upon motion. Her conduct is deliberate, repeated, and continuing.

IV. ARGUMENT

27. To support civil contempt, a movant party must show that a valid court order exists, that the parties had knowledge of the order, and that she willfully disobeyed it.

28. The Gag Order is clear and specific. It was served on counsel for Mace, Craig Brown, and he was obligated to convey it to his client. The Court later extended the Order and reminded counsel of its force and effect.

29. Additionally, the Court reminded counsel of the Gag Order's effect, and Mace was personally present for the hearing and this reminder.

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30. The social media posts, video, and newsletter described above were made after entry and extension of the Gag Order. They refer to Patrick Bryant and Eric Bowman by name, accuse them of serious criminal acts, accuse Patrick Bryant and his attorneys of misconduct, solicit "victims" and witnesses against them, and disparage judges connected to this case. They are precisely the kind of public comments about parties and persons connected to this case, and the kind of publication of materials related to this case, that the Gag Order prohibits.

31. Any suggestion that these communications are insulated because they originated from a Congressional office or from the @RepNancyMace account fails for two reasons. *First*, the Gag Order applies to "all of the above parties" and to their "agents or representatives," and to "any" form of communication. It is not limited to speech in a "personal" capacity. *Second*, these communications are public, social media statements about specific litigants and judges in this case – not legislative acts.

32. Mace's public declaration in her newsletter that "I WILL NOT be silenced. I will fight for you" in the same communication where she attacks Patrick Bryant and his attorneys and recruits additional "victims" is direct evidence of her intent to continue speaking publicly about this litigation despite the Gag Order. Her repeated posts following entry and extension of the Order show willful disobedience, not inadvertence.

33. Furthermore, Mace's violations undermine the Court's ability to ensure a fair and orderly adjudication, risk tainting the jury pool, and cause ongoing reputational harm to Bryant and Bowman.

34. Civil contempt sanctions are necessary to coerce compliance and to compensate movants for the expense of enforcing the Court's Order.

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V. RELIEF REQUESTED

35. For these reasons, Patrick Bryant and Eric Bowman respectfully request that the Court:

A. Issue an Order to Show Cause directing Nancy Mace to appear and show cause why she should not be held in civil contempt for violating the Gag Order;

B. After hearing, find that Mace has willfully violated the Gag Order through:

- The November 26, 2025 X post concerning Eric Bowman's bond;
- The November 28, 2025 X thread calling to "IMPEACH ALL CORRUPT JUDGES" and "especially including those in South Carolina specifically";
- The Instagram video described in Exhibits 5 through 7;
- The December 27, 2025 X video and related posts concerning "pedophile" cases and "predators" in South Carolina; and
- The mass email newsletter titled "Rep. Nancy Mace says 2 more women accuse her ex-fiancé of abuse" and related communications from her office.

C. Order Mace to immediately cease all public communications that violate the Gag Order and to remove or cause to be removed the identified posts, videos and electronic publications to the extent within her control, and to refrain from reposting or republishing the same or substantially similar content during the pendency of the Gag Order;

D. Penalize Mace for violating this Court's Order via a significant consequence to ensure that Mace remembers this Court's current and future Orders and follows them without hesitation.[3]

[3] Mr. Bowman would note that an extended stay in this County's fine correctional institution is an effective and lasting means for conveying the seriousness with which this Court takes its orders.

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E. Impose a coercive civil fine upon Mace in an amount to be set by the Court for each violation found, and for any future violation to ensure continuing compliance with the Gag Order and any further order of this Court;

F. Enter an order of civil contempt that includes a period of incarceration to be imposed only if Mace fails to comply with the Gag Order and this Court's further directives, so that she retains the ability to purge the contempt by full compliance;

G. Require Mace to issue a corrective statement, in language approved by the Court, to the same audiences who received the identified communications, including recipients of the email newsletter and followers of the identified social media accounts, stating that she is prohibited by Court order from making further public statements about this case and that all parties are entitled to a fair adjudication in court;

H. Award Movants their reasonable attorney's fees and costs incurred in investigating these violations and bringing this Motion; and

I. Grant such other and further relief as the Court deems just and proper.

Dated: January 12, 2026

GORDON REES SCULLY MANSUKHANI LLP

By *s/ Nosizi Ralephata*

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