

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

PHIL BRYANT

PLAINTIFF

vs.

Civil Action No.:

23-238-JM

MARY MARGARET WHITE &  
DEEP SOUTH TODAY d/b/a MISSISSIPPI TODAY

DEFENDANTS

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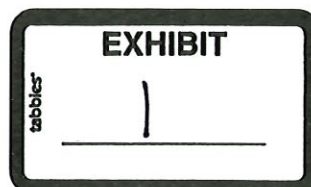
INITIAL WRITTEN DISCOVERY TO MARY MARGARET WHITE

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COMES NOW, Plaintiff Phil Bryant, and serves the following interrogatories, requests for production of documents and things, and requests for admission on Defendant Mary Margaret White pursuant to Rules 33, 34, and 36 of the Mississippi Rules of Civil Procedure:

**DEFINITIONS**

1. The word “person(s)” shall mean all individuals and entities, including sole proprietorships, associations, companies, partnerships, joint ventures, corporations, individuals, and other juridical entities.
2. “Communication” includes face-to-face oral discussion, telephonic discussion, written exchanges, e-mail, text messages, voice messages, and other similar electronic communications.
3. “Document” is used in its broadest sense and includes, but is not limited to, any printed, typewritten, handwritten, graphic or recorded matter of any type and description, however denominated and however and by whomever prepared, recorded, produced, reproduced, disseminated or made, including, but not limited to, the following: Any letter, telephone bill, calls, minutes, resolutions, telegrams, cables, teletypes, report, chart, affidavit, statement, accountants’ statement, financial statement, bank records, book of account, ledger, work sheet, balance sheet,



information sheet, data sheet, log book, journal, list, book, manuscript, desk calendar, appointment book, diary, business records, personal records of employees, opinion, memorandum, summary or record or tape recording or transcript of any conversation or meeting, notes, notebooks, paper, photograph, audio or video tape, recording, microfilm, microfiche, study, contract, written agreement, check, receipt, invoice, bill, computer printout, communication, summary of interview, report and/or summary of investigations, and/or any other writing of whatever description, including computer tapes, computer cards, disk, diskettes, any information contained in any computer although not yet printed and any draft, carbon, photographic copy, preliminary take or version of any such material the contents of which differs in any respect from the original.

4. Something “relating to” or which “relates to” any given subject means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is anyway pertinent to that subject.

5. “Identify” when used concerning a person or persons means to state the name, address, and telephone number of each person, to note the name of the present employer, place of employment, and job title, if any, of each such person, and if such person was affiliated at any time with any party to this litigation, by employment or otherwise, to state the nature, including job title if any, and dates of such affiliation.

6. “Identify” when used concerning a document means to specify the nature of the document; to state the date, if any, appearing on the document, or if none, the date upon which the document was prepared; to describe the document; to identify each person who wrote, signed, dictated or otherwise participated in the preparation of the document; to identify each person, if any, who was an addressee thereof; and, if it now exists, to identify each person having custody of the document.

7. “Identify,” when used concerning communication, means to identify the persons who engage in the communication, the date on which they engaged in the communication, identify any document(s) referenced in the communication, and set forth the entire substance of the communication in full detail.

8. “You” and any pronoun variation of “you” refer to Mary Margaret White.

9. The “subject incident” is when you made the following statement during the 16<sup>th</sup> annual Knight Media Forum in February 2023: “We’re the newsroom that broke the story about \$77 million in welfare funds, intended for the poorest people in the poorest state in the nation, being embezzled by a former governor and his bureaucratic cronies to be used on pet projects like a state-of-the-art volleyball stadium at Brett Favre’s alma mater.”

10. “Bryant” is former-Governor Phil Bryant.

11. “White” is Mary Margaret White.

**COMBINED REQUESTS FOR ADMISSION, INTERROGATORIES, & REQUESTS  
FOR PRODUCTION**

Be advised that, pursuant to Miss. R. Civ. P. 36(b) and 37(a)(4), an insufficient answer or objection to any request for admission will result in a motion in which Bryant will seek an award of attorneys' fees and other reasonable expenses. Additionally, pursuant to Miss. R. Civ. P. 37(c), be advised that your failure to admit the truth of any matter requested below that Bryant later proves to be truthful will result in a motion in which Bryant seeks an award of the reasonable expenses incurred in proving the matter, including attorneys' fees.

1. Please admit you attended the 16<sup>th</sup> annual Knight Media Forum in February 2023.
2. Please admit that a goal of the 16<sup>th</sup> annual Knight Media Forum was to discuss ways to restore trust in the news among the public.
3. Please admit that you participated in a panel discussion titled "The Key to Scaling News Start-Ups" held during the 16<sup>th</sup> annual Knight Media Forum.
4. Please admit that you discussed Mississippi Today's business and reporting during the panel discussion.
5. Please admit that you acted in the course-and-scope of your employment with Mississippi Today while participating in the panel discussion.
  - a. If your answer to this request is anything other than an unqualified admission, please identify all persons, documents, and communications that support your answer
  - b. If your answer to this request is anything other than an unqualified admission, please produce all documents and communications that support your answer.
6. Please admit that you made the following statement during the 16<sup>th</sup> annual Knight Media Forum in February 2023: "We're the newsroom that broke the story about \$77 million in welfare funds, intended for the poorest people in the poorest state in the nation, being embezzled

by a former governor and his bureaucratic cronies to be used on pet projects like a state-of-the-art volleyball stadium at Brett Favre's alma mater.”

7. Please admit that the “we’re” referenced in the quote is Mississippi Today.
8. Please admit that the “newsroom” referenced in the quote is Mississippi Today’s newsroom.
9. Please admit that the “former governor” referenced in the quote is Bryant.
10. Please admit that you accused Bryant of embezzling “\$77 million in welfare funds.”
11. Please admit that you were not under the influence of alcohol or drugs when you made the quoted statement.
12. Please admit that your physical and mental faculties were intact when you made the quoted statement.
13. Please admit that you intended to communicate the quoted statement to all persons who attended your presentation.
14. Please admit that you intended all persons who heard the quoted statement to understand that you accused Bryant of embezzling \$77 million in welfare funds.
15. Please admit that Bryant did not embezzle \$77 million in welfare funds.
  - a. If your answer to this request is anything other than an unqualified admission, please identify all persons, documents, and communications that support your answer
  - b. If your answer to this request is anything other than an unqualified admission, please produce all documents and communications that support your answer.
16. Please admit that, to the best of your knowledge, your claim that Bryant embezzled \$77 million in welfare funds is false.

- a. If your answer to this request is anything other than an unqualified admission, please identify all persons, documents, and communications that support your answer
- b. If your answer to this request is anything other than an unqualified admission, please produce all documents and communications that support your answer.

17. Please admit that your claim that Bryant embezzled \$77 million is defamatory.

- a. If your answer to this request is anything other than an unqualified admission, please identify all persons, documents, and communications that support your answer
- b. If your answer to this request is anything other than an unqualified admission, please produce all documents and communications that support your answer.

18. Please admit that you intended to harm or damage Bryant when you claimed he embezzled \$77 million in welfare funds.

- a. If your answer to this request is anything other than an unqualified admission, please identify all persons, documents, and communications that support your answer
- b. If your answer to this request is anything other than an unqualified admission, please produce all documents and communications that support your answer.

19. Please admit that Mississippi Today published the following statements on May 17, 2023:

I misspoke at a recent media conference regarding the accusations against former Governor Phil Bryant in the \$77 million welfare scandal. He has not been charged with any crime. My remark was inappropriate, and I sincerely apologize.

Mississippi Today has published at least 29 times over the course of its coverage of the welfare scandal, including multiple times in “The Backchannel” investigative series, that Gov. Bryant has not been charged with any crime. My mistake was unintentional and an inaccurate representation of the facts.

This statement will be shared across Mississippi Today’s platforms, including our website, social media, newsletter, mobile app and text service. I have requested that the video of my remark be retracted with this apology.

20. Please admit that you authored the statements published by Mississippi Today on May 17, 2023.

21. Please admit that your May 17, 2023, statement does not retract your claim that Bryant embezzled \$77 million in welfare funds.

22. Please admit that your May 17, 2023, statement does not apologize for your claim that Bryant embezzled \$77 million in welfare funds.

23. Please admit that your May 17, 2023, statement does not state that Bryant did not embezzle \$77 million in welfare funds.

24. Please admit that you have not corrected your claim that Bryant embezzled \$77 million in welfare funds with a clear and unqualified statement that Bryant did not embezzle \$77 million in welfare funds.

25. Please admit that, before participating in the February 2023 panel discussion, you knew the panel discussion would be recorded and uploaded to the Knight Foundation's website for anyone to view on demand.

- a. If your answer to this request is anything other than an unqualified admission, please identify all persons, documents, and communications that support your answer
- b. If your answer to this request is anything other than an unqualified admission, please produce all documents and communications that support your answer.

**INTERROGATORIES**

1. Please identify all persons who may possess discoverable information, no matter whether you intend to introduce that person as a witness in support of your case or whether you intend to introduce that person for impeachment, and for each person, please set forth a summary of the testimony you anticipate the person will provide.

2. Please identify all documents and communications related to your claim that Bryant embezzled \$77 million in welfare funds.

3. Please identify all documents and communications relevant to this suit's claims and defenses.

4. Please identify each person you spoke to regarding the plaintiff within the past three (3) years.

5. Please identify all documents that you authored in whole or part regarding the plaintiff.

6. Please identify any expert witness you have retained to offer an opinion in this suit, and for each such expert witness, provide the following:

- a. a complete statement of all opinions the witness will express and the basis and the reasons for them;
- b. the facts or data considered by the witness in forming the opinions;
- c. any exhibits that will be used to summarize or support the opinions;
- d. the witness's qualifications, including a list of all publications authored in the previous ten years;
- e. a list of all other cases in which, during the previous four years, the witness testified as an expert at trial or by deposition; and



f. a statement of the compensation for the study and testimony in the case.

7. Please identify every individual you will or may call as a witness at the trial of this action, specify them as “will call” or “may call” witnesses, and provide a summary of the testimony you anticipate each witness will provide.

8. Please identify all persons with whom you communicated regarding a retraction, apology, or correction of your claim that Bryant embezzled \$77 million of welfare funds, and for each person, please set forth a summary of the communication between you and the person.

9. Please fully explain why you have not done the following:

- a. Fully and unequivocally retracted your claim that Bryant embezzled \$77 million in welfare funds;
- b. Fully and unequivocally apologized for claiming Bryant embezzled \$77 million in welfare funds; and
- c. Corrected your claim by fully and unequivocally stating that Bryant did not embezzle \$77 million in welfare funds.

10. Please identify all persons with whom you have spoken about the subject incident, the dates you spoke with said person, and provide a complete recitation of what you said in each discussion.

11. Please identify all your employers for the previous ten years, and for each employer, please identify the following:

- a. All training you received concerning the ethical codes, rules, or standards applicable to journalists and journalism industry employees who provide the public with newsworthy information;

- b. All training you received concerning the importance of providing honest and truthful information to the public; and
- c. The reasons why you separated from the employer.

12. Please identify the date and time on which you first became aware that you provided false and misleading information during the subject incident, and if someone else made you aware, please identify the person who brought the matter to your attention.

13. Please identify all communications you have had with Adam Ganucheau and/or Anna Wolfe relating to the following:

- a. The subject incident;
- b. Your note published by Mississippi Today on May 17, 2023;
- c. Bryant;
- d. Communications that Anna Wolfe has had with any person regarding her reporting of the scandal involving employees and contractors of the Mississippi Department of Human Services;
- e. Communications that Adam Ganucheau has had with any person regarding Wolfe's reporting of the scandal involving employees and contractors of the Mississippi Department of Human Services;
- f. Anna Wolfe's December 16, 2021, interview with former-U.S. Congressman Ronnie Shows; and
- g. All documents and communications Anna Wolfe relied on to support her statements in her December 16, 2021, interview with former-U.S. Congressman Ronnie Shows.

**REQUESTS FOR PRODUCTION**

1. Please produce complete copies of all insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse payments made to satisfy the judgment.

2. Please produce complete copies of all codes of ethics you adhere to in performing your professional duties.

3. Please produce complete copies of all written policies and procedures of Mississippi Today to which you adhere in performing your professional duties.

4. Please produce all documents and communications that you reviewed in preparation for your February 2023 panel discussion.

5. Please produce all documents and communications related to your claim that Bryant embezzled \$77 million in welfare funds.

6. Please produce all documents and communications related to your claim that Bryant embezzled \$77 million in welfare funds that you generated or reviewed after your panel discussion.

7. Please produce all documents, communications, and other tangible things within your possession, custody, or control relevant to this suit's claims and defenses. If you claim that any document, communication, or thing is privileged, please produce a privilege log that identifies the document, communication, or thing; that describes the content of the document, communication, or thing; that identifies the author and recipients of the document, communication, or thing, and that identifies the date the document, communication, or thing was created.

8. Please produce a detailed financial statement or any other documents and communications which reflect the following as of the date of production:

- a. a description and value of all your assets;
- b. a description and amount of all your liabilities;

- c. your net worth; and
- d. your balance sheets for the years 2022 and 2023.

9. Please produce all documents and communications you have obtained or will obtain via subpoena duces tecum in this action.

10. Please produce all documents and communications you have obtained or will obtain via authorizations and/or releases.

11. Please produce all documents and communications which support or substantiate all your defenses to this action.


12. Please produce documents and communications related to blogs, forums, or other websites you commented on regarding the plaintiff, including the username/handle under which the comments were made.

13. Please produce all communications you have had about the plaintiff within the past two years.

14. Please produce all documents and communications you have authored that relate to the plaintiff in any way.

15. Please produce all documents and communications that relate to your note that was published by Mississippi Today on May 17, 2023, including, but not limited to, all drafts, edits, and notes.

RESPECTFULLY SUBMITTED, this 26<sup>th</sup> day of July 2023.

By:   
William M. Quin II

Attorney for Plaintiff, the Honorable Phil Bryant,  
64<sup>th</sup> Governor of the State of Mississippi

**OF COUNSEL:**

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W. Thomas McCraney (MS Bar # 10171)  
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Email: wquin@mmqnlaw.com  
tmccraney@mmqnlaw.com

**CERTIFICATE OF SERVICE**

I, William M. Quin II, attorney for Phil Bryant, do hereby certify that a true and correct copy of the foregoing document has been served along with copies of the summons and complaint to:

Mary Margaret White  
3908 Cambridge Street  
Jackson, Mississippi 39216

Deep South Today  
750 Woodlands Parkway, Ste. 100  
Ridgeland, Mississippi 39157

This, the 26<sup>th</sup> day of July 2023.

  
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William M. Quin II