

Timeline

Links to Related Filings	Jones Lawsuit	Scruggs Indictment Re: Lackey	Scruggs v Wilson	Related Events	Comment
	Jones began work for SKG				
	SKG established as “Joint Venture Agreement”				
	Date of SKG agreement shown as Exhibit I				Benton withdrew leaving 5 partners with 4 as the deciding # of votes.
	Profit sharing terms of SKG agreement as stated in suit.				35% share of profit allocated to Nutt for financing. Suit claims Agreement silent as to % of fees for all other parties (not partners)
	Scruggs calls Jones re: profit sharing. Jones worked from 11/05 – 3-06 according to the lawsuit.				1 payment of \$1M to be paid by Nutt outside the venture and no other payment. Jones requests by-out or binding arbitration
	SKG presses Jones to take less than Jones felt due.				
				Trial date referenced in Jones lawsuit.	
	Jones rejects offer				

	<p>Jones gives notice to SKG to buy-out or go to binding arbitration per terms of Agreement</p> <p>Jones requests accounting of SKG expenses</p> <p>Jones gives notice SKG is in breach of Agreement</p>			SKG reportedly had received fees as of this date in Jones	
	Backstrum writes all 5 parties for suggestions on fee allocation.				Partners, not parties, is used here.
	Jones writes Backstrum invoking right to arbitration or mediation				
	Jones request account of SKG income and expense from Meg McAlister of Nutt firm.				
				State Farm Settlement \$26,500,000 awarded	
	Jones gives SKG notice invoking right to arbitration				
	Blackmon notifies SKG partners that Jones had rights to arbitration if 4 of the 5 couldn't agree on split.				
	SKG partner Lovelace lets Jones know he is willing to "work this out..." via fax				

					Qualifying deadline
		From on or about 3/07 until 11/07 defendants conspired with one another and with others...			
	<p>Jones informed by others – after presenting information on the firm’s full performance, that firm would be offered a payment.</p> <p>Further, if firm declined to accept payment, the relationship with SKG would be terminated.</p>			<p>Meeting of the Joint Venture partners w/ Lovelace present by phone.</p> <p>Barnett offered a 6% share of fees earned by the Joint Venture followed by other communication and eventual notice of removal from SKG by vote.</p> <p>Vote also revoked all rights and right to earned fee.</p>	
	<p>SKG cut check for 3% to Jones (\$617,924.43).</p> <p>Jones rejected check.</p>				
	<p>Jones files suit.</p> <p>Asks for 20% of all declared SKG fees, 20% of all future fees, interest since 12/06 plus punitive damages from Scruggs and Barrett.</p>	On and about 3/15/07 – 3/28/07 defendants met to discuss how to influence outcome of Jones lawsuit		Jones retains Grady Tollison.	In 1972 he [Merkel] was a founding member of the law firm of Holcomb Dunbar Connell Merkel & Tollison and continued his litigation practice there until 1982 when he formed the Clarksdale firm Merkel & Cocke.
				Lipstick on a pig ad in CL (Scruggs)	

		Balducci travel to Calhoun City to meet with Judge Lackey.		Supreme Court appoints Lackey Scruggs – WAPT winning lawsuit is priority; keeping Dale from winning is another.	Judge Lackey does not immediately report this visit as “bribe”. He discusses his concern with others including Judge Howorth who was college roommate of John Jones.
		On or about May 3, Balducci notified Judge Lackey of a change in plans and said they would rely on motion to compel arbitration rather than a motion for summary judgment.			
		On or about May 4, Backstrom emailed a proposed order to Balducci. On or about May 4, Balducci faxed a copy to Judge Lackey.			
		On or about May 9, Balducci had a conversation with Judge Lackey and discussed his close relationship with Scruggs “ saying only the 2 of them that had discussed “this is me and Dick”			
				Judge Lackey rules	

				on George Dale	
		Between 5/9 and 9/21 Balducci had several more conversations with Judge Lackey.			
		Immediately after meeting with Judge Lackey and agreeing to pay \$40,000, Balducci called Backstrom			
				Balducci and Langston fill action against Auditor Phil Bryant over \$14M attorney's fees awarded for MCI settlement.	Center of Excellence at Blair E. Batson Hospital for Children; UMC establish and support through MCI settlement funds. SB3024 2007
		Patterson had conversation with Balducci discussing the bribe.			
					Periodic Campaign Finance Report 7/1 – 9/30
		Patterson placed a call to Balducci and said he wanted to know what was going on the "order" and that he'd talked with Scruggs about 15 times and needed to call Dickie. Dickie called Patterson and they discussed Tim coming to the office when he left Calhoun City.			

		<p>Tim was to deliver the order, leave it on Dickie's desk and pick up a package.</p> <p>On or about 10/18 Dickie "prepared and caused to be prepared a \$40K check to Balducci and false document as "cover" to reimburse Tim for bribe.</p> <p>On or about 10/18 Balducci delivered the order and picked up \$40K check and false documentation.</p> <p>On or about 10/18 Balducci called Backstrom and told him he'd delivered "those papers" we've been waiting on.</p>			
					Pre-General Campaign Finance Report 19/1-10/27
		<p>On or about 11/1, Balducci delivered \$10K to Judge Lackey and obtained an amended order.</p> <p>On or about 11/1 Balducci discussed the amended order with Scruggs and Backstrom stating "we paid for this ruling let's be sure it says what we want</p> <p>On 11/1 Balducci had</p>			

		discussion with Dickie wherein Scrus agreed to take care of extra \$10 to Judge and hire "Balducci" to do jury instructions on unrelated case..			
		On 11/5 Scruggs caused email to be sent to Balducci forwarding part of the false documentation for \$10K On 11/5 Balducci traveled to Oxford and took hand delivery of the check and cover letter w/attached documentation.			
		On or about 11/13 Backstrom and Balducci had conversation wherein they discussed scheme for a favorable ruling.			
		Indictment filed.			
					Period Campaign Finance Report 11/28 – 12/31