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August 17, 2022

VIA U.S. POSTAL EXPRESS MAIL - EL 747371493 US

AND

FACSIMILE 1-325-949-6916

AND

verizonlegalprocesscompliance@one.verizon.com

VerizonLegalProcessCompliance@verizon.com

Verizon
Verizon Security Subpoena Compliance
180 Washington Valley Road
Bedminster, NJ 07921

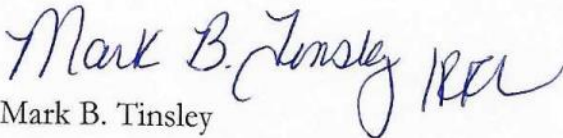
Re: 2021-CP-25-00392; Subpoena to Verizon Subpoena Compliance Department

Dear Sir/Madam:

Enclosed please find **Plaintiff's Motion to Quash Subpoena to Verizon Subpoena Compliance Department with exhibits** which I am providing to you pursuant to your letter addressed to me dated August 12, 2022.

Furthermore, I am providing you with proof of Notice of Electronic Filing of said motion with the court. A filed copy will be provided upon receipt.

Sincerely,



Mark B. Tinsley

MBT/rfl

enc

From: efiledonotreply@sccourts.org
Sent: Wednesday, August 17, 2022 11:57 AM
To: mark@goodingandgooding.com
Cc: receipts@goodingandgooding.com
Subject: Courtesy NEF RE: 2021CP2500392

******* IMPORTANT NOTICE - READ THIS INFORMATION *******
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2021CP2500392

Official File Stamp: 08-17-2022 11:52:45 AM
Court: CIRCUIT COURT
Common Pleas
Hampton
Case Caption: Renee S. Beach , plaintiff, et al VS Gregory M. Parker , defendant, et al
Document(s) Submitted: Motion/Quash
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
Filed by or on behalf of: Mark Brandon Tinsley

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Susan Pedrick McWilliams for Gregory M. Parker, Jason D'Cruz, Blake Greco,
Gregory M. Parker, Inc. D/B/A Parker'S Corporation
Taylor Meriwether Smith, IV for Private Investigations Services Group, Llc, Henry
Rosado, Max Fratoddi
Andrew Sims Radeker for Private Investigations Services Group, Llc, Henry Rosado,
Max Fratoddi
John Martin Grantland for Private Investigations Services Group, Llc, Henry Rosado,
Max Fratoddi
Sarah Megan Larabee for Private Investigations Services Group, Llc, Henry Rosado,
Max Fratoddi
Rhett Douglas Ricard for Gregory M. Parker, Jason D'Cruz, Blake Greco
Edward T. Fenno for Vicky Ward
Benjamin John Tripp for Vicky Ward
Mark Brandon Tinsley for Renee S. Beach et al
Ralph E. Tupper for Private Investigations Services Group, Llc et al
Deborah B. Barbier for Gregory M. Parker, Jason D'Cruz, Blake Greco, Gregory M.
Parker, Inc. D/B/A Parker'S Corporation
Cheryl D. Shoun for Gregory M. Parker, Jason D'Cruz, Blake Greco, Gregory M.
Parker, Inc. D/B/A Parker'S Corporation

Mark Carroll Moore for Gregory M. Parker, Jason D'Cruz, Blake Greco, Gregory M. Parker, Inc. D/B/A Parker'S Corporation

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



STATE OF SOUTH CAROLINA )  
COUNTY OF HAMPTON )

IN THE COURT OF COMMON PLEAS  
FOURTEENTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-25-000392

RENEE S. BEACH, PHILLIP BEACH, )  
ROBIN BEACH, SAVANNAH TUTEN, )  
and SETH TUTEN, )

Plaintiffs, )

v. )

GREGORY M. PARKER, GREGORY M. )  
PARKER, INC. d/b/a PARKER'S )  
CORPORATION, BLAKE GRECO, )  
JASON D'CRUZ, VICKY WARD, )  
MAX FRATODDI, HENRY ROSADO and )  
PRIVATE INVESTIGATIONS SERVICES )  
GROUP, LLC, )

Defendants. )

**PLAINTIFFS' MOTION TO QUASH  
SUBPOENA TO VERIZON SUBPOENA  
COMPLIANCE DEPARTMENT**

YOU WILL PLEASE TAKE NOTICE THAT pursuant to Rules 26(c), 45(c)(3)(A), and 45(c)(3)(B), SCRCF, Plaintiffs, by and through their undersigned attorneys, respectfully move the Court for an Order quashing the subpoena issued by and on behalf of Defendants Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Jason D'Cruz and Blake Greco (hereinafter "the Parker Defendants") to Verizon Subpoena Compliance Department dated August 2, 2022, a copy of which is attached hereto as Exhibit 1. In the exhibit attached to the subpoena, the Parker Defendants seek records of **all** outgoing and incoming calls for Mark B. Tinsley's business cellular number, from the time of the boat crash until present, as well as text messages between Mark Tinsley and certain individuals.<sup>1</sup> For the following reasons, the subpoena should

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<sup>1</sup> The Parker Defendants have also subpoenaed Wesley Donehue's phone records. Plaintiffs do not object in any way to Verizon's compliance with that subpoena.

be quashed.

This action involves allegations that the Parker Defendants conspired with themselves, Vicky Ward and others to harm the Beach family. One of the overt acts in furtherance of that conspiracy is the provision of a confidential mediation video, photographs of Mallory Beach's dead body that were collected by the Parker Defendants and their team of lawyers, and other evidence not publicly available, by the Parker Defendants to others, culminating in those materials being used by Defendant Ward and others as part of the documentary entitled *The Murdaugh Murders: Deadly Dynasty* that recently aired on Investigation Discovery.<sup>2</sup>

The Parker Defendants' defense is based on the premise that the "leak" to Ward either came from the Beach family through their undersigned counsel or from the Parker Defendants. According to them, because the leak did not come from the Parker Defendants, it must have come from the Beach family. That is how they have chosen to defend the case--by denying that they are the source of the leak. Instead, they have repeatedly claimed that Plaintiffs' undersigned counsel leaked these materials, is therefore a necessary witness, and should be disqualified from representing the Plaintiffs, not just in this case but also in the boat crash litigation.<sup>3</sup> That is what this subpoena is really about; it is about Greg Parker trying to be rid of Mark B. Tinsley based on misrepresentations.

The starting point is defining the "leak" that serves as one of the acts in furtherance of their

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<sup>2</sup> Because the Beach family copyrighted the mediation video and sent cease and desist letters to the companies responsible for the production and airing of the documentary threatening the violation of the copyright would result in legal action, the Beach family was able to stop the mediation video from being aired.

<sup>3</sup> Thus far, multiple attempts by Parker to inject these allegations into the boat crash litigation have failed, being rejected by Judge Hall.

conspiracy. The “leak” is the provision of certain documents to the people responsible for the Blackfin production of *The Murdaugh Murders: Deadly Dynasty*. This documentary, co-produced by Gregg Roman and Vicky Ward, recently aired on Investigation Discovery. The ultimate question is whether the Parker Defendants and their confidants gave these materials to Blackfin production company or the people responsible for it. Unquestionably, the Blackfin production had images from the confidential mediation video produced in the boat crash litigation; photographs of Mallory’s dead body that were collected by counsel for the Parker Defendants; exhibits from doctors’ depositions taken in the boat crash litigation; never-released Snapchat videos; and video surveillance of Paul Murdaugh, drinking alcohol at a fraternity party in March of 2021, taken by Greg Parker’s private investigator. All of these materials have been aired by Blackfin at some point.

This last item, the video surveillance of Paul Murdaugh, is significant. It was taken by Sara Capelli, a private investigator hired by Greg Parker to surveil Paul Murdaugh for Greg Parker’s purpose of obtaining video footage of Paul drinking. This video surveillance is part of the purported “confidential work-product” of Greg Parker that is the subject of a petition for a writ of mandamus filed by Greg Parker and pending in the Supreme Court.<sup>4</sup>

Why does this matter? Sara Capelli was hired by Greg Parker after the boat crash to obtain video surveillance of Paul Murdaugh drinking alcohol supposedly to show his propensity to drink.<sup>5</sup> That video is part of the Blackfin production, *The Murdaugh Murders: Deadly Dynasty*,

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<sup>4</sup> As the court may recall, the Parker Defendants indicated they would be appealing the court’s ruling ordering that the documents be produced to Plaintiff. Although a notice of appeal was initially filed with the Court of Appeals, they quickly abandoned the frivolous appeal.

<sup>5</sup> Significantly, Paul was 21 years old when this occurred.

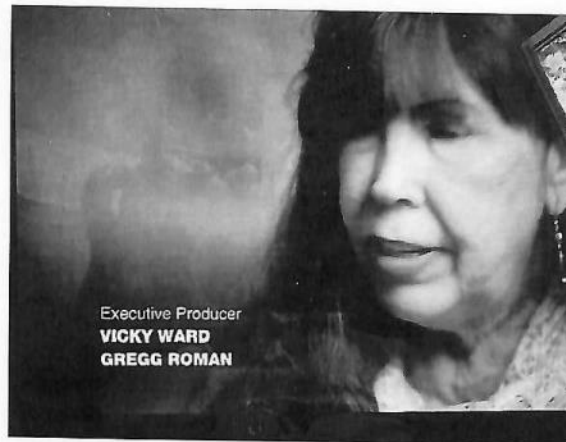


whose executive co-producers are none other than Gregg Roman and Vicky Ward.<sup>6</sup> At the time of the “leak”, only the Parker Defendants and Capelli had access to that video. In fact, as this Court is aware, the “knife fighter” documents show Capelli’s video being sent by email on March 2, 2021, from a partner at the Laurens Group to only one person: Jason D’Cruz—Greg Parker’s personal counsel.

As the recent *Wall Street Journal* article confirms, Greg Parker and his team admitted on the record that Gregg Roman, who they referred to as an “investigative journalist”, was hired and paid by Greg Parker to write an article entitled “*Death and Justice: The Murdaugh Family Murders*” that was published on July 27, 2021, on Gregg Roman’s website [www.greggroman.us](http://www.greggroman.us), and to create this Blackfin documentary. Further, also according to the interview recounted in the *Wall Street Journal* article, Parker and his team allege Gregg Roman’s service contract ended well before the airing of the documentary. This could mean Parker went back and gave the surveillance to the production team outside of Gregg Roman’s contract or they have simply misrepresented the facts again. Either way, Vicky Ward, of course, is Gregg Roman’s partner in crime and his executive co-producer for the documentary, as confirmed in the image below that appeared at the end of the documentary:

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<sup>6</sup> In the documentary, the video has a caption that says “original cell phone” video, rather than accurately describing it as Sara Capelli’s surveillance video.



The Sara Capelli video is definitely a smoking gun and a nexus that directly connects Greg Parker and his team to the “leak” to the Blackfin production, ignoring for the moment that Greg Parker has admitted the connection. This nexus is the link that binds these co-conspirators to the true narrative—one of their own making that they cannot escape—not through false statements to the press, subpoenas for undiscoverable information, appeals claiming work-product or attorney-client privilege, or other filings with this Court.

Interestingly, Parker and his lawyers also ignore the fact that Defendant Ward confirms the undersigned is not the source of the leak. In her Answer filed June 7, 2022, Defendant Ward admits and confirms that she had the information in her possession **before** she ever talked to Mr. Tinsley. See, Defendant Ward’s Answer (Defendant [Ward] admits that **after she already had possession of a certain video with content related to the Murdaugh family and Beach family**, Plaintiff’s counsel, Mark Tinsley, made statements to Defendant [Ward] that the video was part of a confidential mediation process and that whoever provided the video to her violated the mediation rules”)(emphasis added).<sup>7</sup>

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<sup>7</sup> As the text messages between Mark Tinsley and Vicky Ward make clear, she had the materials  
Page 5 of 7



Under the pretense of “looking for evidence of the leak”, the Parker Defendants issued the subpoena at issue seeking **all** of Mr. Tinsley’s business phone records. However, they know that the information sought by the subpoena cannot provide any information about the source of the leak. They know this because they are, and have confirmed that they are, the source of the leak. The purpose of the subpoena is not to collect records that have potential to prove anything concerning the source of the “leak” but rather to collect these records in an attempt to invade counsel’s work product and to annoy and oppress the undersigned.<sup>8</sup> That the information sought in this subpoena will shed any light on the “leak” by Parkers is a false narrative, used to deflect and derail the undersigned’s search to expose the truth.

Moreover, even without the reality that Greg Parker has confirmed that he and his team are the source of the leak, it is not possible that Verizon has any records that would prove or even be reasonably calculated to lead to the discovery of evidence that might prove the source of the “leak”. A simple Google search reveals all that Verizon maintains is a log of phone calls and text (SMS) messages that shows the numbers that participated in the call or text and the beginning and ending

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from her “sources”, i.e., the Parker Defendants, prior to discussing the matter with the undersigned. See, text messages attached hereto as Exhibit 2. Of particular importance is after Ward told Tinsley and Vaux that Parker and his lawyer were the source, she was requested to sign an affidavit to that effect or film Greg Parker being questioned about it. The September 16, 2021, text from Tinsley to Ward asks about whether her “production” company would allow her to do that; unbeknownst to Tinsley, the “production” company was Greg Parker’s employee and secret operative, so Ward texts back that she “cant (sic) get into where our source material comes from”. As a side note, the undersigned is not sure if Ward’s late-night text (9/13/21 at 11:05 p.m.) (“Room 455...all clothes ok!”) was meant to get Tinsley to engage or intended to be sent to Gregg Roman or someone else; regardless, the undersigned did not respond.

<sup>8</sup> Exhibit A to the subpoena asks for records of all outgoing and incoming calls from Tinsley’s business phone. There is no way to transmit any of the “leaked” materials through a phone call even if one occurred. Further, neither Ward’s nor Gregg Roman’s numbers are included in part two of Exhibit A--Ward and Roman are the people to whom the materials were leaked.

time of a phone call. Verizon does not maintain the content of text messages **beyond several days** and has no data related to I-messages. Since a record that a phone call or text message occurred will not prove anything, the information will not lead to the discovery of any admissible evidence.

In short, this subpoena is about creating a false narrative that the Beach family or their undersigned counsel are the source of the leak or have done something untoward. Greg Parker, Mark Moore, and the rest of the Parker team have knowingly made demonstrably, false statements about the Beach family and their undersigned counsel in an effort to concoct a way to argue to have him disqualified from this case, as well as the boat crash case, because they know this is their only chance to escape the truth.

For each of these reasons, the subpoena is unduly burdensome, could potentially require disclosure of information protected by the work product and attorney-client privileges, and will result in annoyance, embarrassment, and oppression. Moreover, the subpoena is procedurally improper because it was issued to and served on an out-of-state entity without being properly domesticated by the State of New Jersey. The Plaintiffs therefore respectfully request an Order quashing the subpoena.

GOODING AND GOODING, P.A.

By: s/Mark B. Tinsley

Mark B. Tinsley – S.C. Bar # 15597

P.O. Box 1000

Allendale, SC 29810

803-584-7676

Attorneys for Plaintiffs

August 17, 2022



STATE OF SOUTH CAROLINA  
COUNTY OF HAMPTON

|                                                                                                                                                                                                                         |                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|
| RENEE S. BEACH, PHILLIP BEACH, ROBIN BEACH,<br>SAVANNAH TUTEN, AND SETH TUTEN,<br><br>Plaintiffs,                                                                                                                       | IN THE COURT OF COMMON PLEAS<br>CASE NO. 2021-CP-25-00392 |
| v.                                                                                                                                                                                                                      | <b>SUBPOENA</b>                                           |
| GREGORY M. PARKER, GREGORY M. PARKER, INC.<br>d/b/a PARKER'S CORPORATION, BLAKE GRECO,<br>JASON D'CRUZ, VICKY WARD, MAX FRATODDI, HENRY<br>ROSADO, AND PRIVATE INVESTIGATION SERVICES<br>GROUP, LLC,<br><br>Defendants. | Pending in Hampton County, SC                             |

TO: **Verizon Subpoena Compliance Department, 180 Washington Valley Rd., Bedminster, NJ 07921**

☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

|                    |               |
|--------------------|---------------|
| PLACE OF TESTIMONY | COURTROOM     |
|                    | DATE AND TIME |

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

|                     |               |
|---------------------|---------------|
| PLACE OF DEPOSITION | DATE AND TIME |
|---------------------|---------------|

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below. **See Exhibit "A" attached for documents to be produced.**

|                                                                                                             |                               |
|-------------------------------------------------------------------------------------------------------------|-------------------------------|
| 1230 Main Street, Suite 700 (29201)<br>Post Office Drawer 2426<br>Columbia, SC 29202<br>ATTN: Mark C. Moore | August 22, 2022 at 10:00 a.m. |
|-------------------------------------------------------------------------------------------------------------|-------------------------------|

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| PREMISES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | DATE AND TIME |
| ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION |               |

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.


|                                                                                                                                                                                                                           |                |                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-------------------------------|
| Attorney/Issuing Officer's Signature<br><br>Indicate if Attorney for Plaintiff or Defendant<br>Attorney's Address and Telephone Number | 8/2/22<br>Date | Rhett D. Ricard<br>Print Name |
| Attorney for Defendants Gregory M. Parker, Gregory M. Parker, Inc. d/b/a Parker's Corporation, Jason D'Cruz, and Blake Greco<br>205 King Street, Suite 400, Charleston, SC 29403 - - 843.577.9440                         |                |                               |
| Clerk of Court/Issuing Officer's Signature<br>Pro Se Litigant's Name, Address and Telephone Number :                                                                                                                      | Date           | Print Name                    |

EXHIBIT "1"



EXHIBIT "A"

DOCUMENTS TO BE PRODUCED

- Records of all outgoing and incoming calls, including but not limited to call logs and any corresponding data including the time of day the call was made and the duration of the communication, for the time period February 23, 2019 to the present for wireless cell phone number 803-300-4925 associated with customer Mark Tinsley.
- All messages, whether SMS or iMessage communications, for the time period February 23, 2019 to the present, between the phone number 803-300-4925 associated with customer Mark Tinsley and the following phone numbers:
  - 843-460-7990;
  - 843-532-4045;
  - 804-814-5364;
  - 803-422-1874;
  - 913-707-2041; and
  - 843-368-7423.

12:18



Vicky

Text Message  
Sat, Sep 11, 10:20 AM

Hi Mark, it's Vicky Ward. So when could I come meet with you? As of now I am pretty open starting Tuesday morning. Let me know. Look forward! Best, Vicky

Sat, Sep 11, 8:55 PM

Tuesday likely works best for me. Not sure what time yet. I'll likely be in Bluffton

Sat, Sep 11, 11:19 PM

Great. Keep me posted.

Mon, Sep 13, 11:30 AM

Hi Mark, any thoughts on timing for tomorrow? Best, Vicky

What works for you

Morning works better for me

Ok. I am staying in Hilton Head



EXHIBIT "2"

12:18



Vicky

Ok. I am staying in Hilton Head  
so that works. What time?

I'll find out shortly

Mon, Sep 13, 2:57 PM

How about 10 am in Bluffton?

Mon, Sep 13, 4:39 PM

Perfect. Where am I coming?

I'll figure it out

Mon, Sep 13, 9:14 PM

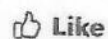
1251 May River Rd., Bluffton, SC  
29910

Mon, Sep 13, 11:05 PM

Room 455...all clothes ok!

Tue, Sep 14, 1:03 PM

case that killed Marilyn Beach, motion says



Like



Comment



Share



Janice Koehle Johnson and 65 others

40 photos





12:18

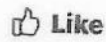
LTE 



Vicky

Tue, Sep 14, 1:03 PM

**Case that killed Manory Beach, motion says**



Like



Comment



Share



**Janice Koehle Johnson and 65 others**

**48 shares**

**Most Relevant** ▾



**John Michnuk**

Imagine that, can't find an island packet newspaper in a Parkers since this story came out. Hmmm. I wonder why?

16m Like Reply



Write a reply...



Top Fan

**Sandra Wetherall-Wachtel**  
**Justice for Mallory**

2d Like Reply



...

islandpacket.com



islandpacket.com



Tue, Sep 14, 2:23 PM

Thank you for your time today.  
Much appreciated.

Tue, Sep 14, 10:37 PM



12:18

LTE 



Vicky

Tue, Sep 14, 10:37 PM

Is the guy they arrested the guy  
who phoned you???

No. The guy arrested is who I  
was phoned about

Got it. Amazing....

Wed, Sep 15, 7:03 AM

Did you see the NYT? [https://  
www.nytimes.com/2021/09/14/  
us/alex-murdaugh-shooting-  
arrest.html](https://www.nytimes.com/2021/09/14/us/alex-murdaugh-shooting-arrest.html)

What do you make of that????  
Tbd....

Thu, Sep 16, 12:08 PM

Hi Mark, wondering if we can  
chat re getting a snippet of you  
for our sizzle tomorrow? I know  
you are in depositions today. I  
hear you are a big hunter and I  
was wondering if there was  
somewhere to film you that  
illustrates that? You will probably  
be on camera overreaching...



12:18

LTE 



Vicky

Thu, Sep 16, 12:08 PM

Hi Mark, wondering if we can chat re getting a snippet of you for our sizzle tomorrow? I know you are in depositions today. I hear you are a big hunter and I was wondering if there was somewhere to film you that illustrates that? You will probably say I am overreaching. 😊

Thu, Sep 16, 9:46 PM

Hey. So where are we on the Parker's affidavit or filming?

I wanted to film you tomorrow! As you probably guessed I cant get into where our source material comes from, but think that the reporting I am doing ought to be helpful to you and your clients so hope you would consider helping me with that by letting me interview you. Your call, obviously. Best V

Fri, Sep 17, 8:34 AM





12:19



Vicky

material comes from, but think that the reporting I am doing ought to be helpful to you and your clients so hope you would consider helping me with that by letting me interview you. Your call, obviously. Best V

Fri, Sep 17, 8:34 AM

Where do you want to meet?

Oh wow... we are headed to the airport...let me talk to the crew. Where are you?

Which airport?

What time?

Could you zoom at 5pm today?

No

Can you stop by Tabor's office. It's on the way

We would have to take a later flight. Seeing what we can do

