

<p>STATE OF SOUTH CAROLINA COUNTY OF HAMPTON</p> <p>MANUEL SANTIS-CRISTIANI,  Plaintiff,  v.  RICHARD ALEXANDER “Alex” MURDAUGH, RONNIE L. CROSBY, WILLIAM F. BARNES, III, RUSSELL LAFFITTE, PALMETTO STATE BANK, AND PETERS, MURDAUGH, PARKER, ELTZROTH &amp; DETRICK, P.A.,  Defendants.</p>	<p>IN THE COURT OF COMMON PLEAS</p> <p><b>Case No.: 2022-CP-25-00285</b></p> <p><b>MOTION BY DEFENDANTS AND INTERPLEADER PLAINTIFFS PETERS, MURDAUGH, PARKER, ELTZROTH &amp; DETRICK, P.A., RONNIE L. CROSBY, AND WILLIAM F. BARNES, III TO INTERPLEAD DISPUTED FUNDS WITH THE COURT, TO BE DISMISSED FROM THIS ACTION WITH PREJUDICE, AND TO ASSESS SANCTIONS AGAINST PLAINTIFF’S COUNSEL</b></p>
<p>PETERS, MURDAUGH, PARKER, ELTZROTH &amp; DETRICK, P.A., RONNIE L. CROSBY, AND WILLIAM F. BARNES, III,  Interpleader Plaintiffs,  v.  MANUEL SANTIS-CRISTIANI, RICHARD ALEXANDER “ALEX” MURDAUGH, RUSSELL LAFFITTE, PALMETTO STATE BANK, AND MEDICAL UNIVERSITY HOSPITAL AUTHORITY D/B/A MEDICAL UNIVERSITY OF SOUTH CAROLINA,  Interpleader Defendants.</p>	

COMES NOW Defendants and Interpleader Plaintiffs Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A. (“PMPED”), Ronnie L. Crosby (“Crosby”), and William F. Barnes, III (“Barnes”), by and through undersigned counsel, and hereby move the Court to allow PMPED to deposit funds held by PMPED, which are at issue in this case, to dismiss PMPED, Crosby, and Barnes from this

action with prejudice, and to sanction Plaintiff's counsel for violating Rule 11, SCRPC, by filing a pleading making false and highly defamatory allegations against Movants without any good faith basis for those allegations and without conducting a reasonable investigation of the facts prior to filing suit.

This motion is based on the following incontrovertible facts, which are substantiated by public court records and the affidavits and documents attached to this motion. *See* Exhibits A - H filed herewith. The undersigned certify that they did not consult with Plaintiff's counsel prior to filing this motion as it would serve no useful purpose, as the undersigned previously attempted to communicate with Plaintiff's counsel concerning their basis for filing this action but Plaintiff's counsel did not respond to the undersigned's efforts to communicate with them.

1. Plaintiff's counsel filed the Complaint on October 7, 2022, asserting that Plaintiff is entitled to settlement proceeds from personal injury litigation in which PMPED represented Plaintiff. The Complaint alleges that Plaintiff was not aware of the terms of the settlement and did not receive any funds from the settlement. Both of these allegations are demonstrably false.

2. Plaintiff was one of several passengers injured in a rollover accident that occurred in November 2008 in Colleton County. PMPED was hired to represent the occupants of the vehicle in a products liability case against Ford Motor Company and Michelin North America. Alex Murdaugh, an employee of PMPED at the time, handled the case with assistance from Ronnie Crosby and William Barnes.

3. Because Plaintiff is a Mexican national and does not speak English, he required the services of an interpreter to keep him informed. For this purpose, Blanca Simpson, of Brunson, South Carolina, was engaged to serve as interpreter for Plaintiff. During the course of Plaintiff's

case, Ms. Simpson assumed the role of interpreter, assisted with making travel arrangements for the Plaintiff, and served as the liaison between PMPED and the Plaintiff.

4. The case was settled following a mediation on March 8, 2013. Plaintiff traveled from Mexico to Hampton County to participate in the mediation of his case. Plaintiff was present for the mediation, as was Ms. Simpson, who interpreted for the attorneys and explained the settlement to Plaintiff. Plaintiff was fully aware of the terms of the settlement and approved them.

5. The settlement was not finalized at the mediation, but rather was consummated in the days following it. Because of the diplomatic and financial obstacles involved in travel to the United States, Plaintiff granted a Power of Attorney to Russell Laffitte (“Laffitte”) so that Laffitte could sign the settlement papers on his behalf. Laffitte signed the settlement agreement on behalf of Plaintiff, as requested.

6. As a result of the accident that was the basis of the lawsuit, Plaintiff was treated for several weeks at the Medical University of South Carolina (“MUSC”) for injuries sustained in the wreck. Plaintiff’s outstanding medical expenses totaled \$330,738.47, according to a complaint filed by MUSC in the Court of Common Pleas, Case No. 2014CP105656, captioned as *Medical University Hospital Authority d/b/a Medical University of South Carolina v. Manuel Santis-Cristiani*. A default judgment in the amount of \$331,247.38 against Mr. Santis-Cristiani resulted from that action.

7. Upon information and belief, Alex Murdaugh entered into communication with the attorney representing MUSC, with the intent of reaching an agreement on a reduced amount for which MUSC would settle its claim for repayment of Plaintiff’s medical bills. Upon information and belief, MUSC agreed to accept \$70,000 in exchange for a full release of its lien against Plaintiff’s settlement.

8. Attorneys' fees and litigation expenses were paid from the settlement funds, leaving \$143,857.24. Of that amount, \$70,000.00 was held in escrow for payment of the MUSC lien.

9. Upon information and belief, instead of making the agreed-upon \$70,000 payment to MUSC, on or around August 11, 2016, Murdaugh requested that PMPED issue a check in the amount of \$70,000 made payable to "Forge" for a structured settlement. In fact, Murdaugh had opened a business account using the fictitious name "Forge" for the purpose of surreptitiously diverting funds from PMPED's trust account. *See* the Indictment for Obtaining Signature or Property By False Pretenses, and Computer Crime filed November 18, 2021, Case No. 2021-GS-47-31 of the State Grand Jury of South Carolina (detailing the "Forge" scheme and the theft of \$70,000).

10. According to bank records, Murdaugh deposited the \$70,000 check to his "Forge" account and, in so doing, converted the funds. *Id.* Movants had no knowledge of Murdaugh's criminal misconduct at the time.

11. In October of 2016, PMPED issued a check made payable to Plaintiff of all remaining settlement funds, or \$73,857.24. The check was deposited at Palmetto State Bank on November 10, 2016, in anticipation of transmitting the funds to Plaintiff by international wire transfer. *See* Exhibit A.

12. Immediately following their deposit, the Plaintiff's settlement funds totaling \$73,857.24 USD, or 1,457,687.83 Mexican Pesos, were sent by international wire transfer through Palmetto State Bank to the Plaintiff's bank account at Banco Azteca. In short, Plaintiff received the entire amount of the settlement that was due to him. The allegation made in the Complaint in this action that Plaintiff did not receive his settlement monies is demonstrably false. *See* Exhibit B.

13. In September of 2021, lawyers at PMPED uncovered Alex Murdaugh's fraudulent "Forge" scheme and the theft of funds from clients, from the law firm, and from his law partners and family members individually. PMPED demanded Alex Murdaugh's immediate resignation and reported his misconduct promptly to law enforcement and attorney disciplinary authorities. *See Exhibit C.*

14. PMPED replenished its trust account for the money that Alex Murdaugh had misappropriated in connection with the Santis-Cristiani settlement, depositing \$70,000 thereto, by PMPED check number 150477 on September 27, 2021. *See Exhibit D.*

15. PMPED presently retains the Funds ("Funds"), which total \$70,000.

16. Since learning of the above-mentioned misappropriation, PMPED has made countless unsuccessful attempts to enter in contact with Plaintiff, including through Plaintiff's interpreter, Blanca Simpson, from late 2021 through the summer of 2022. *See Exhibits E, F, G, and H.*

17. At that time, PMPED was not aware that the MUSC lien had not been satisfied, and therefore was endeavoring to have the Funds sent to the Plaintiff. Ms. Simpson represented to Lee D. Cope, an attorney formerly with PMPED, that the Plaintiff wanted Ms. Simpson to hold the Funds for him in the U.S. and asked that PMPED pay the Funds directly to Ms. Simpson to be held in an account in her name. Mr. Cope, however, insisted that PMPED attorneys speak with the Plaintiff himself to confirm that he wished for Ms. Simpson to hold the Funds for him. Because Ms. Simpson never arranged such a call and Plaintiff never provided such confirmation, PMPED continued to keep the Funds in trust. *See Exhibit E.*

18. This past summer, Ms. Simpson informed Ronnie Crosby that Mr. Santis-Cristiani had engaged attorney Korey Williams to represent him. Mr. Crosby called Mr. Williams and told

him of the Funds being held in trust. Mr. Williams told Mr. Crosby that he would be back in touch. *See Exhibit F.*

19. On July 27, 2022, Mr. Crosby received a call from Glenn Walters, who said that Mr. Williams had associated him to work on the case. Mr. Crosby asked Mr. Walters to reach out to the undersigned in order to resolve the Plaintiff's claim. (Mr. Walters never contacted the undersigned.) After the conversation ended, Mr. Crosby called Mr. Walters back and told him that PMPED would provide the Santis-Cristiani client file if Mr. Walters produced a written authorization to do so signed by the Plaintiff, as required by Rule 1.6(a) of the South Carolina Rules of Professional Conduct. No such authorization was ever provided. Neither Mr. Williams nor Mr. Walters made any effort whatsoever to obtain the client file. To this date, they have not done so.

20. William Barnes first learned of the suit and the allegations made in it against him on October 10, 2022. Prior to that time, Mr. Barnes had not received any communication from Plaintiff's counsel and had no knowledge of any potential claim against him by the Plaintiff. *See Exhibit G.*

21. Believing that Blanca Simpson would have knowledge refuting the allegations in the Complaint, Mr. Barnes called her and had a seven-minute conversation on the telephone. He asked her specifically about the allegations that the Plaintiff was not aware that funds were recovered for him in the settlement of his case and that he never received any of the settlement recovery. Ms. Simpson stated in response that Plaintiff was aware of the settlement and had received funds from it. *Id.*

22. Ms. Simpson further stated that she was not aware that the suit had been filed and that she had not seen, read, or reviewed the allegations of the Complaint. As to Mr. Barnes

personally, she said that “you didn’t do anything wrong” and expressed surprise that Mr. Barnes had been named as a defendant in the suit. *Id.*

23. On October 11, 2022, after learning of this action and the allegations made against him, Ronnie Crosby contacted Ms. Simpson to ask her if she was aware that a suit had been filed on the Plaintiff’s behalf and that it named Mr. Crosby personally as a defendant. Ms. Simpson said that she had just learned about the suit the day before in a conversation with William Barnes. *See Exhibit F.*

24. Mr. Crosby asked Ms. Simpson specifically about the allegation that Plaintiff was not informed of the amount of funds recovered on his behalf and had never received any of the settlement funds. Ms. Simpson then confirmed that Plaintiff was aware of the settlement and had in fact received funds from it. She said that she had engaged Korey Williams to represent the Plaintiff under a power of attorney she had from the Plaintiff. She expressed surprise that the suit named Crosby and Barnes individually and said that she was not aware of anything they had done wrong. *Id.*

25. PMPED does not dispute that the Funds should be disbursed, but PMPED only recently learned of the outstanding lien held by MUSC, which calls into question whether Plaintiff is entitled to these Funds. Upon information and belief, MUSC has received no payment for medical services provided to Plaintiff, and the \$70,000 at issue was misappropriated by Alex Murdaugh from MUSC, not from the Plaintiff.

26. For these reasons, PMPED files this Interpleader Complaint seeking leave to deposit the Funds with the Court so that it may determine where the Funds should properly be applied.

27. PMPED asks that the Court accept these Funds, that PMPED be granted leave to interplead the Funds with the Clerk of Court pursuant to Rule 22, SCRCP, and that PMPED,

Ronnie L. Crosby, and William F. Barnes, III, be discharged from liability as to all claims in this matter and dismissed from this action with prejudice.

28. Movants also ask that, upon the conclusion of this action, Plaintiff be released from any further liability on the MUSC lien, and that said lien and debt be fully discharged.

29. Movants also ask the Court to impose such sanctions as it deems appropriate, for the actions of Plaintiff's counsel in filing their complaint with highly defamatory and false allegations against Movants, without any investigation, without any good faith basis for the allegations, and without even requesting or reviewing the client file offered to them by Ronnie Crosby, which would have immediately alerted them to the fact that their allegations were false.

30. Upon information and belief, Plaintiff's counsel drafted the allegations based solely on information provided to them by Blanca Simpson, without further investigation, or that they simply made up. Ms. Simpson, however, was not aware that the suit had been filed until William Barnes called her on October 10, 2022, and had not seen, read, or reviewed the allegations of the Complaint prior to its filing. In her conversations with Mr. Barnes and Mr. Crosby, she explicitly contradicted key allegations of the Complaint.

31. Upon information and belief, Plaintiff's counsel never spoke with the Plaintiff prior to filing suit, never asked him to review the complaint, and never even informed him that they were filing suit in his name.

32. Rule 11 of the South Carolina Rules of Civil Procedure allow a court to impose an appropriate sanction against attorneys upon motion for failure to make a reasonable inquiry to determine that the complaint stood well-grounded in fact and warranted by existing law, and for filing the complaint for an improper purpose. These sanctions, when awarded, serve to "deter future litigation abuse." *Kovach v. Whitley*, No. 28109, 2022 S.C. LEXIS 100, at \*3 n.4 (Aug. 31, 2022) (citing *In re Kunstler*, 914 F.2d 505, 522 (4th Cir. 1990)). Movants respectfully submit that

the facts summarized above and supported by the attached affidavits and materials present an appropriate case for Rule 11 sanctions against Plaintiff's counsel.

33. Movants also ask that the Court enter such other and further relief as it considers just and proper.

Respectfully submitted,

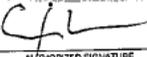
WYCHE, P.A.

s/Wallace K. Lightsey  
Wallace K. Lightsey (SC Bar # 6476)  
James H. May (SC Bar #74278)  
Jessica L. Monsell (SC Bar #105232)  
Post Office Box 728  
Greenville, SC 29602-0728  
Telephone: 864-242-8200  
E-Mail: wlightsey@wyche.com  
jmay@wyche.com  
jmonsell@wyche.com

**ATTORNEYS FOR DEFENDANT &  
INTERPLEADER PLAINTIFF PMPED,  
RONNIE L. CROSBY, AND WILLIAM F.  
BARNES, III**

# **EXHIBIT A**

## **PMPED Client Disbursement Check**

<b>PETERS, MURDAUGH, PARKER, ELTZROTH &amp; DETRICK, P.A.</b> <small>CLIENT TRUST ACCOUNT P.O. BOX 457 HAMPTON, SC 29924</small>		 <b>PALMETTO STATE BANK</b> <small>HAMPTON, S. C. 29924 67-259/532</small>	51699
PAY TO THE ORDER OF <i>Manuel Santis-Cristiani</i>		10/14/2016	Security Features: Details on back. 
\$ 73,857.24 <i>Seventy-Three Thousand, Eight Hundred Fifty-Seven &amp; 24/100 Dollars</i>		DOLLARS	
<i>Manuel Santis-Cristiani</i> REDACTED		 AUTHORIZED SIGNATURE	
MEMO <i>Settlement Proceeds</i>		REDACTED	
⑈00051699⑈			

DDA Debits - 11/10/2016

PALMETTO STATE BANK 1115 1/2 S. STATE ST. HAMPTON, SC 29924 TEL: 803/733-1111 FAX: 803/733-1112 WWW.PALMETTOSTATEBANK.COM		ENDORSE HERE <i>PCBB wire transfer</i>	
⑈00051699⑈ TRF DT=11/10/2016 TRF AM=11:58:06 AM BranchName=PALMETTO STATE BANK-HAMPTONB=89 Inst=PALMETTO STATE BANK RNum=>053202686< TrfDt=5-TrfDt=11/10/16			

DDA Debits - 11/10/2016

## **EXHIBIT B**

### **Palmetto State Bank Wire Transfer**



**FUNDS MANAGEMENT**

- ACCOUNT SUMMARY
- TODAY'S ACTIVITY
- INTRADAY BALANCING
- TRANSACTIONS
- ACTIVITY SEARCH
- DOMESTIC WIRES
- INTL SERVICES
- PROCESSING LOG

**FRB CASH SHIP**

**STATEMENTS/NOTICES**

**TRANSFER FILES**

**REPORT CENTER**

**PCBB REPORTS**

**RESOURCES**

**FED FUNDS RATE**

**INTERNATIONAL PAYMENT REQUEST**

When sending Mexican Peso payments, it is essential that you include the CLABE (Clave Bancaria Estandarizada). The CLABE is an account number comprised of 18 digits inclusive of bank code, branch location, account number, and control digit. If you send a transaction to Mexico without a valid CLABE, you may incur some fees and/or risk the transaction failing to complete.

<b>Transaction Type</b>	Wire		
<b>BNF Name</b>	MANUEL SANTIS CRISTIANI/	REDACTED	
<b>BNF Bank</b>	BANCO AZTECA		
<b>BNF Currency</b>	MXN		
<b>Amount (MXN)*</b>	73,857.24 MXN	<b>Your Rate</b> 0.051087	<b>Amount (USD)</b> 3,773.14
<b>Conversion Type</b>	Amount entered in foreign currency; USD equivalent calculated during processing.		
<b>Is REG E?</b>	NO, this is not a consumer remittance payment.		
<b>Notes to BNF</b>	Account Number: REDACTED		

**EMAIL NOTIFICATIONS (NOT SENT WITH WIRE)**

**PCBB COMMENTS**

Transaction originally entered on 11/17 12:58 PM EST by blindblad, and was last modified on 11/17 01:00 PM EST by thumbert.

Approved by thumbert on 11/17 01:00 PM EST.

**BACK**

**Beneficiary Detail**

<b>Internal I.D.</b>	PETERS MURDAUGH PARKER	<b>Client Code</b>	
<b>BNF's Name</b>	MANUEL SANTIS CRISTIANI/GREGORIO SANTIS CRISTIANI		
<b>Currency</b>	MXN - New Peso	<b>Country</b>	MEXICO
<b>BNF Bank Name</b>	BANCO AZTECA	<b>Swift Code</b>	AZTKMXMM
<b>Account No</b>	REDACTED		
<b>Bank Code</b>			
<b>BNF's Bank Address</b>		<b>BNF's Mailing Address</b>	
<b>Street 1</b>	1A CALLE SUR PTE	<b>Street 1</b>	REDACTED
<b>Street 2</b>	8 COL COMITAN	<b>Street 2</b>	
<b>Street 3</b>		<b>Street 3</b>	
<b>City, State/Prov</b>	DE DOMINGUEZ, CHIAPAS	<b>City, State/Prov</b>	REDACTED CHIAPAS
<b>Zip/Postal Code</b>		<b>Zip/Postal Code</b>	
<b>Country</b>	MEXICO	<b>Country</b>	MEXICO
<b>Payment notification?</b>	No	<b>BNF Email</b>	

ELECTRONICALLY FILED - 2022 Oct 21 5:13 PM - HAMPTON - COMMON PLEAS - CASE#2022CP2500285

<b>Correspondent Bank Information</b>			
Bank Name		ABA No.	
Swift Code		BNF Account No. at Correspondent Bank	
Secondary Bank Name		Secondary ABA No.	
		BNF Account No. at Secondary Bank	
<hr/>			
<b>Remitter Name</b>	PETERS MURDAUGH PARKER ELTZROTH		
<hr/>			
<b>Additional Remitter Details</b>		<b>Originator Details</b>	
BIC/ABA No	REDACTED	Name	Palmetto State Bank
Account No		BIC/ABA No	REDACTED
Street 1	94 WESCOTT ST	Account No	REDACTED
Street 2		Street 1	601 1st Street West
City, State/Prov	BRUNSON,SC	Street 2	
Zip/Postal Code	29911	City, State/Prov	Hampton,SC
Country	USA	Zip/Postal Code	29924-2541
		Country	USA



FUNDS MANAGEMENT

- ACCOUNT SUMMARY
- TODAY'S ACTIVITY
- INTRADAY BALANCING
- TRANSACTIONS
- ACTIVITY SEARCH
- DOMESTIC WIRES
- INTL SERVICES
- PROCESSING LOG

FRB CASH SHIP

STATEMENTS/NOTICES

TRANSFER FILES

REPORT CENTER

PCBB REPORTS

RESOURCES

FED FUNDS RATE

### INTERNATIONAL PAYMENT REQUEST

When sending Mexican Peso payments, it is essential that you include the CLABE (Clave Bancaria Estandarizada). The CLABE is an account number comprised of 18 digits inclusive of bank code, branch location, account number, and control digit. If you send a transaction to Mexico without a valid CLABE, you may incur some fees and/or risk the transaction failing to complete.

<b>Transaction Type</b>	Wire		
<b>BNF Name</b>	MANUEL SANTIS CRISTIANI/	REDACTED	
<b>BNF Bank</b>	BANCO AZTECA		
<b>BNF Currency</b>	MXN		
<b>Amount (USD)*</b>	70,084.10 USD	<b>Your Rate</b> 0.050645	<b>Amount (MXN)</b> 1,383,830.59
<b>Conversion Type</b>	Amount entered in USD; foreign equivalent calculated during processing.		
<b>Is REG E?</b>	NO, this is not a consumer remittance payment.		
<b>Notes to BNF</b>	REDACTED		
<b>EMAIL NOTIFICATIONS (NOT SENT WITH WIRE)</b>			
<b>PCBB COMMENTS</b>			

Transaction originally entered on 11/18 04:32 PM EST by blindblad, and was last modified on 11/21 09:52 AM EST by thumbert.

Approved by thumbert on 11/21 09:52 AM EST.

[BACK](#)

#### Beneficiary Detail

<b>Internal I.D.</b>	PETERS MURDAUGH PARKER	<b>Client Code</b>	
<b>BNF's Name</b>	MANUEL SANTIS CRISTIANI/	<b>REDACTED</b>	
<b>Currency</b>	MXN - New Peso	<b>Country</b>	MEXICO
<b>BNF Bank Name</b>	BANCO AZTECA	<b>Swift Code</b>	AZTKMXMM
<b>Account No</b>	REDACTED		
<b>Bank Code</b>			
<b>BNF's Bank Address</b>		<b>BNF's Mailing Address</b>	
<b>Street 1</b>	1A CALLE SUR PTE	<b>Street 1</b>	REDACTED
<b>Street 2</b>	8 COL COMITAN	<b>Street 2</b>	
<b>Street 3</b>		<b>Street 3</b>	
<b>City, State/Prov</b>	DE DOMINGUEZ, CHIAPAS	<b>City, State/Prov</b>	REDACTED CHIAPAS
<b>Zip/Postal Code</b>		<b>Zip/Postal Code</b>	
<b>Country</b>	MEXICO	<b>Country</b>	MEXICO
<b>Payment notification?</b>	No	<b>BNF Email</b>	

ELECTRONICALLY FILED - 2022 Oct 21 5:13 PM - HAMPTON - COMMON PLEAS - CASE#2022CP2500285

Correspondent Bank Information			
Bank Name		ABA No.	
Swift Code		BNF Account No. at Correspondent Bank	
Secondary Bank Name		Secondary ABA No.	
		BNF Account No. at Secondary Bank	
<hr/>			
Remitter Name	PETERS MURDAUGH PARKER ELTZROTH		
<hr/>			
Additional Remitter Details		Originator Details	
BIC/ABA No	REDACTED	Name	Palmetto State Bank
Account No	REDACTED	BIC/ABA No	REDACTED
Street 1	94 WESCOTT ST	Account No	REDACTED
Street 2		Street 1	601 1st Street West
City, State/Prov	BRUNSON,SC	Street 2	
Zip/Postal Code	29911	City, State/Prov	Hampton,SC
Country	USA	Zip/Postal Code	29924-2541
		Country	USA

# **EXHIBIT C**

## **Misappropriation Check**



## **EXHIBIT D**

# **Trust Account Replenishment Check**

Manuel Santis - Christiani



09/27/2021 4:13 PM  
br# 69 Tr# 3 Seq# 127  
Account X) REDACTED  
DFA Deposit \$70,000.00

We appreciate your business!

Neighbors helping neighbors.

**PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.**  
ATTORNEY ACCOUNT  
P.O. BOX 457  
HAMPTON, SC 29924



**PALMETTO  
STATE BANK**  
HAMPTON, S. C. 29924  
67-259/532

150477

9/25/2021

PAY TO THE  
ORDER OF

PMPED Client Trust Account

\$ 70,000.00

Seventy Thousand & No/100 Dollars

DOLLARS

PMPED Client Trust Account

AUTHORIZED SIGNATURE

MEMO

replace RAM misappropriated funds - M. Sanits-Cristiani

⑈00 150477⑈

REDACTED

PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A. • ATTORNEY ACCOUNT

150477

9/25/2021 PMPED Client Trust Account

Invoice Date	Invoice No.	Description	Amount
9/25/2021		replace RAM misappropriated funds - M. Sanits-Cristiani	\$70,000.00

DEPOSIT TICKET

CASH

PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.  
CLIENT TRUST ACCOUNT  
P.O. BOX 457  
HAMPTON, SC 29924

70,000 00

DATE 9/27/2021

SIGNATURE



STOP HERE FOR LESS CASH  
**PALMETTO  
STATE BANK**  
HAMPTON S C 29924

67-259/532

REGISTRATION NUMBER 67-259/532  
ALL BANKING SERVICES ARE PROVIDED BY  
PALMETTO STATE BANK, A MEMBER OF THE  
FIRST FIDELITY GROUP

1

70,000 00

REDACTED

00 2

**ELTZROTH & DETRICK, P.A.**

007026-008064

Manuel Santis-Cristiani v. Ford Motor Company

150477

Replace RAM Misappropriated Funds - Manuel Santis-

70,000 00

**EXHIBIT E**

**Lee Cope Affidavit**

<p>STATE OF SOUTH CAROLINA COUNTY OF HAMPTON</p> <p>MANUEL SANTIS-CRISTIANI,  Plaintiff,  v.</p> <p>RICHARD ALEXANDER “Alex” MURDAUGH, RONNIE L. CROSBY, WILLIAM F. BARNES, III, RUSSELL LAFFITTE, PALMETTO STATE BANK, AND PETERS, MURDAUGH, PARKER, ELTZROTH &amp; DETRICK, P.A.,  Defendants.</p>	<p>IN THE COURT OF COMMON PLEAS</p> <p><b>Case No.: 2022-CP-25-00285</b></p> <p><b>AFFIDAVIT OF LEE D. COPE</b></p>
<p>Peters, Murdaugh, Parker, Elzroth &amp; Detrick, P.A., Ronnie L. Crosby, and William F. Barnes,  Interpleader Plaintiffs,  v.</p> <p>Manuel Santis-Cristiani, Richard Alexander “Alex” Murdaugh, Russell Laffitte, Palmetto State Bank, and Medical University Hospital Authority d/b/a Medical University of South Carolina,  Interpleader Defendants.</p>	

Personally appeared before me, Lee D. Cope, the undersigned who upon being duly sworn states

1. In late 2021 or early 2022, I ran into Blanca Simpson at the Food Lion grocery store in Hampton, South Carolina. We were talking about how she was doing in the aftermath of Maggie

and Paul's death and the discovery of Alex's thefts. She also brought up the Cristiani matter with which I was only vaguely familiar. I told her we should meet at the office to discuss.

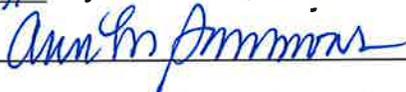
2. Sometime after that encounter, she came to the office so we could discuss the Cristiani matter. During that meeting, she informed me that she had been in contact with Cristiani and that he did not want his money in a Mexican bank account because the government would take it. Instead, he wanted it in an account here in the United States. She told me that he wanted her to have control over the account. I told her that we would need to talk with him before we could do anything like that. She then explained it was very difficult to contact him. I responded that we would need to do so before any further action could be taken.

3. I do not recall having any further conversations with her.

  
\_\_\_\_\_  
Lee D. Cope

Sworn to before me this

21 day of October, 2022.

  
\_\_\_\_\_  
Notary Public for South Carolina

My Commission Expires: 3/6/2030

**EXHIBIT F**

**Ronnie Crosby Affidavit**

<p>STATE OF SOUTH CAROLINA COUNTY OF HAMPTON</p> <p>MANUEL SANTIS-CRISTIANI, Plaintiff,</p> <p>v.</p> <p>RICHARD ALEXANDER "Alex" MURDAUGH, RONNIE L. CROSBY, WILLIAM F. BARNES, III, RUSSELL LAFFITTE, PALMETTO STATE BANK, AND PETERS, MURDAUGH, PARKER, ELTZROTH &amp; DETRICK, P.A.,</p> <p>Defendants.</p>	<p>IN THE COURT OF COMMON PLEAS</p> <p>Case No.: 2022-CP-25-00285</p> <p><b>AFFIDAVIT OF RONNIE L. CROSBY</b></p>
<p>Peters, Murdaugh, Parker, Elzroth &amp; Detrick, P.A., Ronnie L. Crosby, and William F. Barnes, Interpleader Plaintiffs,</p> <p>v.</p> <p>Manuel Santis-Cristiani, Richard Alexander "Alex" Murdaugh, Russell Laffitte, Palmetto State Bank, and Medical University Hospital Authority d/b/a Medical University of South Carolina,</p> <p>Interpleader Defendants.</p>	

Upon penalty of perjury, I, Ronnie L. Crosby, having first been duly sworn, depose and say that the following is true and correct:

1. I have personal knowledge of the facts set forth in this Affidavit. I am a citizen of the State of South Carolina and am competent to swear to the matter set forth below and do so of my own free will.

2. I am a defendant personally named in the above-captioned action.

3. On October 10, 2022, I was made aware of a lawsuit brought against me by Manuel Santis-Cristiani.

4. Prior to that point, I had not been made aware of a potential claim against me personally by Mr. Santis-Cristiani's lawyers, Glenn Walters, Sr., or Korey L. Williams.

5. As of October 18, 2022, I still have not been served with the lawsuit.

6. In June 2022, I spoke to Blanca Simpson as a part of our continuing effort to advise Mr. Santis-Cristiani about monies that we had restored to trust following the discovery of the theft of \$70,000 by Alex Murdaugh. Mrs. Simpson served as an interpreter during the representation of Mr. Santis-Cristiani and she helped facilitate his travel from Mexico to South Carolina in March of 2013 for a mediation. It was my belief that she may still have contact information that we could use.

7. After Mrs. Simpson informed me that Korey Williams was representing Mr. Santis-Cristiani, I called Mr. Williams and informed him of the money in trust. Mr. Williams said he would get back to me.

8. On July 27, 2022, I received a call from attorney Glenn Walters who indicated that Mr. Williams had associated him to help on the case. I told him we were represented by attorney Wallace Lightsey and told him to reach out to Mr. Lightsey. After our conversation I called Mr. Walters back and told him that we would provide a copy of the file if he would provide a written authorization signed by Mr. Santis-Cristiani. I have never spoken to Mr. Walters or Mr. Williams since that day and was surprised to learn that a lawsuit had been filed.

9. The lawsuit accuses me of being in a conspiracy with others and stealing from a client.

10. After reviewing the allegations in the Complaint, I knew I had done nothing wrong and knew that some of the more relevant allegations were in fact false.

11. On October 11, 2022, I reached out to Mrs. Simpson and asked her if she was aware that Mr. Santis-Cristiani had filed a lawsuit and named me personally. She told me that she learned about it the day before in a conversation with William Barnes.

12. I asked Mrs. Simpson specifically about paragraph 20 of the complaint, which alleges that Mr. Santis-Cristiani was not informed of the amount of funds recovered on his behalf and "to this date, the Plaintiff [Mr. Santis-Cristiani] has never received the funds from the Product Liability Case."

13. Mrs. Simpson told me that Mr. Santis-Cristiani was aware of the settlement and had in fact received funds from the Product Liability Case.

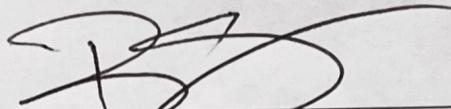
14. Mrs. Simpson told me that she had power of attorney over Mr. Santis-Cristiani and that she signed paperwork with Corey Williams to represent Mr. Santis-Cristiani.

15. I asked Mrs. Simpson why William Barnes and I had been sued as we had done nothing wrong. She confirmed that she was unaware of anything we had done wrong and told me that we should not be in the case. She also told me that "this wasn't supposed to go this far" and that it was supposed to be a settlement with the firm "because of all that had gone on."

16. Mrs. Simpson told me she was not aware that the lawsuit had been filed until William Barnes called her, and had not seen, read, or reviewed the allegations of the filed Complaint.

17. I declare under penalty of perjury, under the laws of the United States of America and of the State of South Carolina, that the above is true and correct.

AS TO ANYTHING FURTHER, THE AFFIANT SAITH NOT.

  
Ronnie L. Crosby

Sworn to and subscribed before me this

18<sup>th</sup> day of October, 2022.

Notary Public for South Carolina



My Commission Expires:

2

**BARBARA SPADE**  
Notary Public  
South Carolina  
My Comm. Expires March 28, 2026



# **EXHIBIT G**

## **William Barnes Affidavit**

STATE OF SOUTH CAROLINA  
COUNTY OF HAMPTON

MANUEL SANTIS-CRISTIANI,  
Plaintiff,

v.

RICHARD ALEXANDER "Alex"  
MURDAUGH, RONNIE L. CROSBY,  
WILLIAM F. BARNES, III, RUSSELL  
LAFFITTE, PALMETTO STATE BANK,  
AND PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.,

Defendants.

Peters, Murdaugh, Parker, Eltzroth & Detrick,  
P.A., Ronnie L. Crosby, and William F.  
Barnes,

Interpleader Plaintiffs,

v.

Manuel Santis-Cristiani, Richard Alexander  
"Alex" Murdaugh, Russell Laffitte, Palmetto  
State Bank, and Medical University Hospital  
Authority d/b/a Medical University of South  
Carolina,

Interpleader Defendants.

IN THE COURT OF COMMON PLEAS

**Case No.: 2022-CP-25-00285**

**AFFIDAVIT OF  
WILLIAM F. BARNES, III**

WFB  
1

Upon penalty of perjury, I, William F. Barnes, III, having first been duly sworn, depose and say that the following is true and correct:

1. I have personal knowledge of the facts set forth in this Affidavit. I am a citizen of the State of South Carolina and am competent to swear to the matter set forth below and do so of my own free will.

2. I am a defendant personally named in the above-captioned action.

3. On October 10, 2022, I was made aware of a lawsuit brought against me by Manuel Santis-Cristiani.

4. Prior to learning of the lawsuit on October 10, 2022, I had not been made aware of a potential claim against me personally by Mr. Santis-Cristiani's lawyers, Glenn Walters, Sr. or Korey L. Williams.

5. As of October 20, 2022, I still have not been served with the lawsuit.

6. After reviewing the allegations in the Complaint, I knew that the essence of what was being alleged was completely untrue.

7. In the underlying Product Liability Case, Mr. Santis-Cristiani required the services of a Spanish-speaking interpreter because he does not speak English. Ms. Blanca Simpson served as his interpreter.

8. I had reason to believe that Ms. Simpson would have knowledge of facts that would readily refute the allegations in the Complaint, because she served as the liaison between PMPED and Mr. Santis-Cristiani and was present at the mediation with Mr. Santis-Cristiani.

9. On October 10, 2022, I called Ms. Simpson and the two of us had a seven (7) minute phone conversation.

10. I asked Ms. Simpson specifically about paragraph 20 of the complaint, which alleges that Mr. Santis-Cristiani was not informed of the amount of funds recovered on his behalf and “to this date, the Plaintiff [Mr. Santis-Cristiani] has never received the funds from the Product Liability Case.”

11. Ms. Simpson told me that Mr. Santis-Cristiani was aware of the settlement and had in fact received funds from the Product Liability Case.

12. Near the end of the conversation, Ms. Simpson told me that she currently has a power of attorney for Mr. Santis-Cristiani.

13. During the conversation, Ms. Simpson expressed surprise that I had been personally named in the lawsuit.

14. Ms. Simpson told me that “You didn’t do anything wrong.”

15. She also stated that “You and Ronnie [Crosby] should not be defendants in this case.”

16. She was neither aware that a lawsuit had been filed, nor had she seen, read, or reviewed the allegations of Plaintiff’s Complaint.

17. I declare under penalty of perjury, under the laws of the United States of America and of the State of South Carolina, that the above is true and correct.

AS TO ANYTHING FURTHER, THE AFFIANT SAITH NOT.

*[SIGNATURE PAGE TO FOLLOW]*

*Wil. Barnes*

William F. Barnes, III

Sworn to and subscribed before me this

20 day of October, 2022.

*Lois Megan Davis*  
Notary Public for South Carolina

My Commission Expires: 7/29/2031



*WFB*  
4

# **EXHIBIT H**

## **Chelci Avant Affidavit**

STATE OF SOUTH CAROLINA  
COUNTY OF HAMPTON

MANUEL SANTIS-CRISTIANI,  
Plaintiff,

v.

RICHARD ALEXANDER "Alex"  
MURDAUGH, RONNIE L. CROSBY,  
WILLIAM F. BARNES, III, RUSSELL  
LAFFITTE, PALMETTO STATE BANK,  
AND PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.,

Defendants.

Peters, Murdaugh, Parker, Elzroth & Detrick,  
P.A., Ronnie L. Crosby, and William F.  
Barnes,

Interpleader Plaintiffs,

v.

Manuel Santis-Cristiani, Richard Alexander  
"Alex" Murdaugh, Russell Laffitte, Palmetto  
State Bank, and Medical University Hospital  
Authority d/b/a Medical University of South  
Carolina,

Interpleader Defendants.

IN THE COURT OF COMMON PLEAS

**Case No.: 2022-CP-25-00285**

**AFFIDAVIT OF CHELCI S. AVANT**

Personally appeared before me, Chelci S. Avant, the undersigned who upon being duly sworn states:

1. I have personal knowledge of the facts set forth in this Affidavit. I am a citizen of the State of South Carolina and am competent to swear the matter set forth below and do so of my own free will.
2. After PMPED discovered misappropriation related to the settlement of Mr. Manuel Santis-Cristiani, I was asked to locate and contact him.
3. The purpose of contacting Manuel Santis-Christiani was to inform him of misappropriation of settlement funds in his case by Alex Murdaugh.
4. Despite several attempts, I was unsuccessful in my efforts to speak with Manuel-Santis-Cristiani because he is a resident and citizen of Mexico.
5. In February of 2022, my colleague Lee D. Cope informed me that Blanca Simpson, Alex Murdaugh's former housekeeper, had reliable contact information for Santis-Cristiani.
6. I texted Blanca Simpson on February 10, 2022 to request Manuel Santis-Cristiani's phone number. *See Exhibit A.*
7. On March 10, 2022, I tried to contact Manuel Santis-Cristiani via text message, using the phone number provided by Blanca Simpson. *See Exhibits A and B.*
8. In this text message, I stated that our firm found a problem with his file that we needed to discuss with him. *See Exhibit B.*
9. To date, I have not received a response.
10. I declare under penalty of perjury, under the laws of the United States of America and the State of South Carolina, that the above is true and correct.

AS TO ANYTHING FURTHER, THE AFFIANT SAITH NOT.

Chelci S. Avant  
Chelci S. Avant

Sworn to before me this  
18 day of October, 2022.

Rebecca E. Gardner

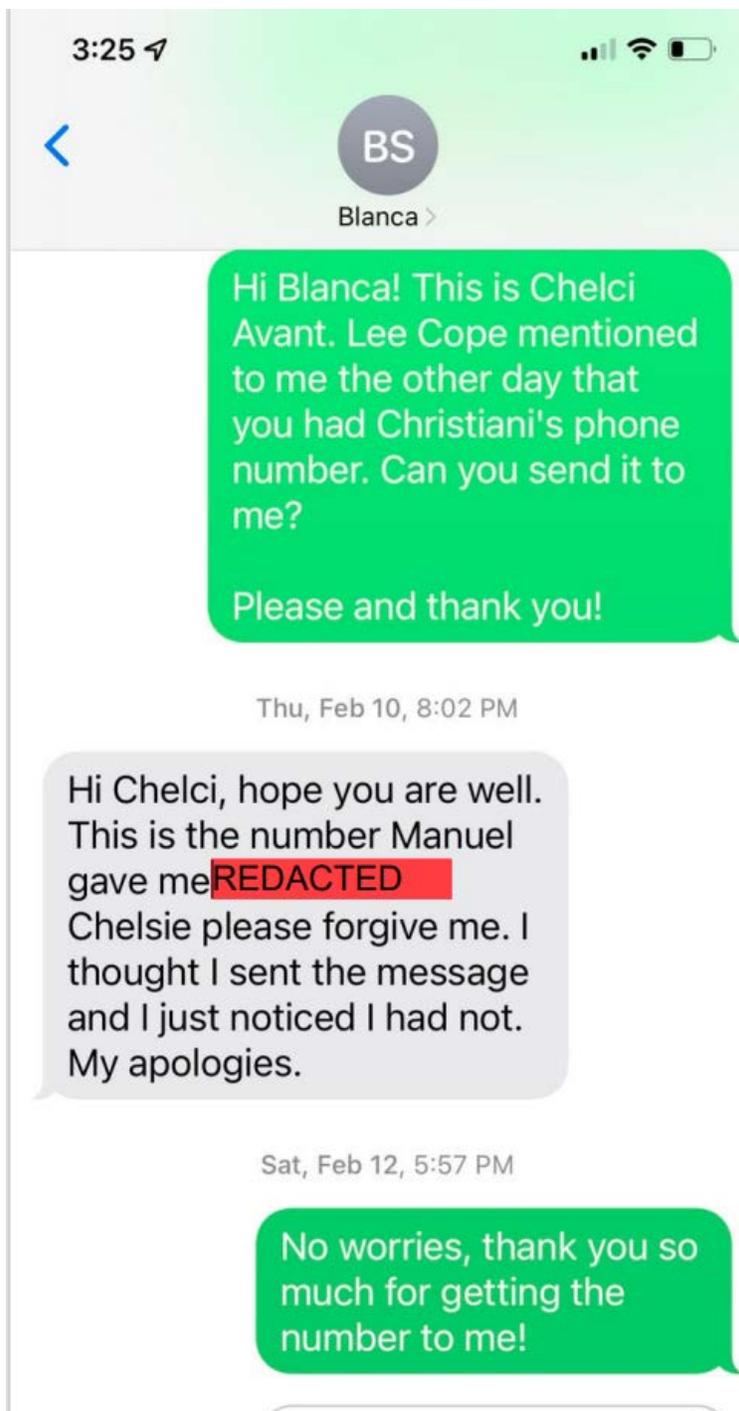
Notary Public for South Carolina

My Commission Expires: 08/30/2032



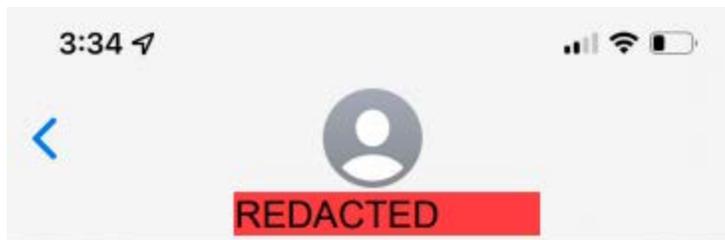
# **EXHIBIT A**

## **Text messages exchanged with Ms. Blanca Simpson**



# **EXHIBIT B**

**Text message sent to Plaintiff**



Text Message  
Thu, Mar 10, 1:37 PM

¡Hola Manuel! Mi nombre es Chelci Avant. Alex Murdaugh solía trabajar en mi firma y creo que manejó su archivo, hemos encontrado un problema que debemos discutir con usted. ¿Puedes hablar ingles?

