

STATE OF SOUTH CAROLINA)
)
COUNTY OF HAMPTON)

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

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.)

SUMMONS
CIVIL CONSPIRACY/OUTRAGE
(Jury Trial Demanded)

TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint upon the subscriber at his office at 265 Barnwell Highway, Allendale, South Carolina, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, Plaintiffs will apply to the Court for the relief demanded in the Complaint and judgment by default will be rendered against you for the relief demanded in the Complaint.

GOODING AND GOODING, P.A.

By: s/Mark B. Tinsley

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Attorneys for Plaintiff

December 3, 2021

STATE OF SOUTH CAROLINA)
)
COUNTY OF HAMPTON)

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

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

Plaintiffs,)

v.)

COMPLAINT
CIVIL CONSPIRACY/OUTRAGE
(Jury Trial Demanded)

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.)

The Plaintiffs allege:

1. Renee Beach is a citizen of the state of South Carolina, is the natural mother of Mallory Beach, and is the duly appointed Personal Representative of the Estate of Mallory Beach, the plaintiff in the civil action pending in Hampton County entitled *Renee S. Beach, as Personal Representative of the Estate of Mallory Beach v. Gregory M. Parker, Inc, et al.*, Case No. 2019-CP-25-00111 (hereinafter referred to as “the Civil Action”. As part of her efforts in the Civil Action and in accordance with the confidential mediation process required by the South Carolina Alternative Dispute Resolution Rules (hereinafter referred to as “SCADRR”), Renee Beach produced a confidential mediation presentation video. This confidential video remains the private property of Renee Beach.

2. Phillip Beach is a citizen of the state of South Carolina, is the natural father of Mallory Beach and is a beneficiary of the Estate of Mallory Beach, the plaintiff in the civil action

pending in Hampton County entitled *Renee S. Beach, as Personal Representative of the Estate of Mallory Beach v. Gregory M. Parker, Inc, et al.*, Case No. 2019-CP-25-00111.

3. Robin Beach is a citizen of the state of South Carolina and is the wife of the natural father of Mallory Beach.

4. Savannah Tuten is a citizen of the state of South Carolina and is the natural child of Renee Beach and Phillip Beach and the sister of Mallory Beach. To date, Savannah Tuten has refused to give and has never given a public interview about the death of her sister.

5. Seth Tuten is a citizen of the state of South Carolina and is the husband of Savannah Tuten and the brother-in-law of Mallory Beach. To date, Seth Tuten has refused to give and has never given a public interview about the death of Mallory Beach.

6. Upon information and belief, Defendant Gregory M. Parker is a citizen of the state of Georgia and the owner and CEO of Defendant Gregory M. Parker, Inc. a/k/a Parker's Corporation (hereinafter "Parker's"), a foreign corporate entity which maintains agents and employees, transacts business, owns and/or manages real estate, and otherwise is connected by ownership and operation to gas stations and convenience stores located in South Carolina. Further, Parker's is a named defendant in the Civil Action and on July 7, 2020, Plaintiffs' counsel emailed Parker's counsel of record in the Civil Action the confidential mediation video as a part of the confidential mediation process in the Civil Action. In Court filings subsequent to July 7, 2020, Parker's asked the Court for permission to use the confidential mediation video, recognizing that the video was in fact the confidential property of Renee Beach as Personal Representative of her daughter's Estate. Upon information and belief, Parker's counsel of record in the Civil Action shared the confidential mediation video with Defendants Parker, Greco and D'Cruz.

7. Upon information and belief, Defendant Blake Greco is a citizen of the state of Georgia and acts as General Counsel of Defendant Parker's. Defendant Greco has attended or participated in most of the proceedings in the Civil Action. Defendant Blake Greco owed an independent duty to Plaintiffs to maintain the confidentiality of the mediation video and at all times herein acted in his own personal interest, outside the scope of his representation of Defendant Parker's.

8. Upon information and belief, Defendant Jason D'Cruz is a citizen of the state of Georgia and acts as personal legal counsel of Defendant Gregory Parker and advises or directs activities of Parker's in its handling of the Civil Action. Defendant D'Cruz has attended and participated in proceedings in the Civil Action. Defendant D'Cruz owed an independent duty to Plaintiffs to maintain the confidentiality of the mediation video and at all times herein acted in his own personal interest, outside the scope of his representation of Defendant Gregory Parker and/or Parker's.

9. Upon information and belief, Defendant Vicky Ward is a citizen of the state of New York who acting in concert with others has produced and released or plans to produce and release what she claims to be a "documentary" entitled "The Murdaugh Murders". On or prior to November 24, 2021, Defendant Ward and those with whom she is acting in concert published publicly a video "trailer" for her documentary entitled "The Murdaugh Murders". The "trailer" video incorporates six (6) different sections from the confidential mediation video belonging to the Beach family.

10. Upon information and belief, Defendants Max Fratoddi, Henry Rosado, and Private Investigations Services Group, LLC are all citizens of South Carolina, who worked with Parker, Greco, and D'Cruz in furtherance of a plan to launch and present a social media campaign to inflict

severe emotional distress upon the Plaintiffs to diminish their resolve to prosecute Parker's for contributing to causing the death of Mallory Beach in the Civil Action and arranged for or participated in the distribution of the confidential mediation and other private materials to Vicky Ward and others.

11. The Court has jurisdiction over the parties hereto and the subject matter hereof. Additionally, at the time the causes of action accrued, the Plaintiffs were residents of Hampton County and the most substantial acts or omissions giving rise to the causes of action set forth herein occurred in Hampton County.

12. In and through the Civil Action, Defendants Gregory M. Parker, Blake Greco, Jason D'Cruz, and Parker's, through what amounts to an abuse of process and fraudulent means, with the intent and ulterior motive to harm the family, were able to obtain photographs of Mallory Beach's dead body. Upon information and belief, these photographs have never been made public by any law enforcement agency nor anyone else.

13. Prior to September 14, 2021, Defendants Parker, Greco, and D'Cruz hired social media "knife fighters" and others to affect the proceedings in the Civil Action and to devise a way to harm the Plaintiffs to affect their resolve in prosecuting the Civil Action. These Defendants and those with whom they conspired, upon information and belief, created fake social media posts in order to harass and emotionally harm the Plaintiffs. Further, these Defendants conspired with Defendants Fratoddi, Rosado and Private Investigations Services Group, LLC who worked with Parker, Greco, and D'Cruz in furtherance of the plan to launch and present a social media campaign and to misappropriate the private property of the Plaintiffs, invade their privacy and misappropriate their images, all in an effort to inflict severe emotional distress upon the Plaintiffs to diminish their resolve to prosecute Parker's for contributing to causing the death of Mallory Beach in the Civil

Action. In furtherance of their conspiracy, these Defendants arranged for and/or participated in the production of the confidential video to Vicky Ward. Additionally, the Defendants, singularly or in concert, arranged for and provided Ward with photographs of Mallory Beach's dead body.

14. On or about September 14, 2021, Vicky Ward was told that the confidential video she had in her possession was in fact confidential and in her possession in violation of the confidential mediation process and its rules. In an attempt to get the Plaintiffs and their counsel to appear in her documentary, Vicky Ward acknowledged that Parker and his law firm, referencing Defendant D'Cruz's law firm Baker Hostetler, "had an agenda" and that she had "nothing to do with them other than having their stuff." The Plaintiffs and their counsel refused to participate in Ward's documentary.

15. Despite Plaintiffs' refusal to participate in Ward's documentary, on or before November 24, 2021, Ward and others with whom she is acting in concert published a "trailer" for the documentary entitled "The Murdaugh Murders" featuring portions of the confidential mediation video and photographs of Mallory's dead body. Further, Ward and others with whom she is acting in concert plan to use and publish the remaining portions of the confidential video including images of the Plaintiffs.

16. At no time have the Plaintiffs ever agreed in any way to participate in Defendant Ward's tasteless and completely obscene production.

17. Upon information and belief, Defendant Ward and others aided and abetted the other Defendants in their civil conspiracy to use their abuse of process and violation of the SCADR to inflict severe emotional distress upon the Plaintiffs and to harass them in a manner so unconscionable it shocks the conscience.

FOR A FIRST CAUSE OF ACTION
(Civil Conspiracy)

18. The Plaintiffs reiterate the allegations contained herein as if fully and completely repeated verbatim here.

19. The Defendants, excluding Defendant Ward, conspired with each other and others to engage in actions through surreptitious activities, the abuse of process and violations of the SCADR with the intent to harm the Plaintiffs and inflict extreme emotional distress upon them. Upon information and belief, Defendant Ward and others ratified the initial conspiracy, aided and abetted the initial conspiracy for money or for their own personal remuneration, and joined in the conspiracy to harm the Plaintiffs, invade their privacy, steal their confidential property and inflict severe emotional distress upon the Plaintiffs. In furtherance of their common design or plan to injure, coerce and damage the Plaintiffs, the Defendants have made false statements, violated the SCADR, stolen or helped to steal private confidential property with no right to do so, avoided or attempted to avoid the discovery of these illegal activities by filing false documents, and other things that have yet to be discovered, without any reasonable basis to do so.

20. As a direct and proximate result of the Defendants' actions, the Plaintiffs have suffered extreme emotional and mental distress, worry and anxiety, they have had their images stolen for profit of others, they have had their privacy invaded, and other damages to be determined at the trial of this matter.

21. Furthermore, because the Defendants acted knowingly with a conscious disregard for the Plaintiffs and their rights and with actual malice, the Plaintiffs are entitled to punitive damages.

FOR A SECOND CAUSE OF ACTION
(Outrage/Intentional Infliction of Emotional Distress)

22. The Plaintiff reiterate the allegations contained herein as fully and completely repeated verbatim.

23. The Defendants' actions were intentional, reckless, willful, wanton, and oppressive, constituted extreme and outrageous conduct and exceeded all bounds of decency and were atrocious and utterly intolerable in a civilized society. Moreover, no reasonable person could be expected to endure such conduct and distress.

24. As a direct and proximate result of the outrageous conduct of the Defendants, the Plaintiffs have suffered extreme emotional distress, nervousness, worry, anxiety, hysteria, physical sickness, loss of sleep, loss of enjoyment of life, depression and other damages as may be determined at trial.

WHEREFORE, the Plaintiffs pray for judgments against the Defendants in such sums as are sufficient to adequately compensate for their actual damages, for such punitive damages as the jury may reasonably award, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

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