

STATE OF SOUTH CAROLINA
COUNTY OF HERRY

) IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
CASE NO.: _____

) JOHN PAUL MILLER,

) Plaintiff,

) vs.

) MELISSA MANCARI

) Defendant.

) **SUMMONS**

TO THE DEFENDANT NAMED ABOVE:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action which is herewith served upon you and to serve a copy of your Answer to the said Complaint on the Attorney for the aforesaid Plaintiff located at 5307 North Kings Highway, Myrtle Beach, SC 29577, within thirty (30) days after the service hereof; exclusive of the date of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint and for judgment by default.

s/Russell B. Long
RUSSELL B. LONG
Bar Number: 65402
Attorney for the Plaintiff
5307 North Kings Highway
Myrtle Beach, SC 29577
843-449-1222 FAX 843-497-0562
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September 16, 2024
Myrtle Beach, South Carolina

STATE OF SOUTH CAROLINA) IN THE FIFTEENTH JUDICIAL CIRCUIT
)
COUNTY OF HORRY) COURT OF COMMON PLEAS
)
JOHN PAUL MILLER,) CIVIL ACTION No. 2024-CP-26-
)
)
Plaintiff,)
vs.) **COMPLAINT**
)
)
MELISSA MANCARI,)
)
Defendant.)
)

Now comes the Plaintiff John Paul Miller (hereinafter referred to as "Plaintiff") by and through his undersigned attorney, and complains of the Defendant Melissa Mancari (hereinafter referred to as "Defendant") and would show unto this honorable Court that:

JURSDICTION AND VENUE

1. Plaintiff is a citizen and resident of Horry County, South Carolina.
2. Upon information and belief, Defendant is currently a citizen and resident of Horry County, South Carolina.
3. This Honorable Court has personal jurisdiction over the parties to this Civil Action, including by and through S.C. Code Section 36-2-803, subject matter jurisdiction over the issues hereto, and venue for this action is proper in Horry County, South Carolina.

GENERAL ALLEGATIONS OF FACT

4. All allegations of fact made previously are repeated as if set forth here verbatim.
5. On or about August 30, 2024, Defendant, falsely and with malice aforethought, made an appearance on "The Robbie Harvey" (@TheRobbieHarvey) , a Youtube channel with over 105,000 subscribers,

claiming to be employed as a paralegal in a local Domestic Relations law firm. In this interview, Defendant claimed to have spoken with Plaintiff many months prior on a telephone call, purportedly a call initiated by the Plaintiff, to seek marital legal advice. Defendant published to the audience at that time that Plaintiff told her that he wanted to "destroy" his wife, and was seeking an attorney that would help pursue that endeavor. Defendant then went on in the interview proclaiming that she believed that Plaintiff either murdered his wife, or had a role in the death of his wife, neither of which is true. Plaintiff's wife's death had been, at the time of this publication, ruled a suicide by the authorities in Robeson County, North Carolina, the location of her self inflicted demise.

6. The following day, August 31, 2024, Defendant made another social media appearance for the sole purpose of defaming and destroying the reputation of the Plaintiff. On this occasion the Defendant appeared on a Tic Toc influencers account for a two part extended interview, for the sole purpose of proliferating the false and harmful claims about Plaintiff. Again Defendant shared lies and untruths about Defendant on the Tic Toc channel "Steph's Case Files", claiming to have spoken with Defendant in her capacity as a paralegal months prior, making false statements alleged to be quotes by Plaintiff, and sharing her beliefs that Plaintiff was an abusive husband and was responsible for his wife's death. This two part interview was viewed by thousands of people.
7. During the months prior, Plaintiff began seeing posts of videos and photos of himself, apparently filmed from a location adjacent to his attorney's office, the Winslow Law Firm. On Friday September 6, after an appointment with the Winslow Firm, Plaintiff stopped into the adjacent attorneys offices to inquire as to who might be responsible for constantly harassing him by filming him every time he visited his attorney. After a conversation with the attorney and her paralegal, Plaintiff realized that the

paralegal that had been defaming and slandering him on social media, Melissa Mancari, actually worked in that office adjacent to his attorney's office.

8. The following day, on September 7, 2024, Defendant again appeared on Tic Toc to publish her false and defamatory statements about Plaintiff. During this one hour and a half interview Defendant claimed that Plaintiff had appeared at her place of employment, and that while there he threatened her. The Defendant's supervising attorney was present for the entire encounter on September 6, 2024 and indicated to counsel when questioned that Plaintiff did not threaten the Defendant, this being just another one of Defendants outrageous lies about Plaintiff.
9. Upon information and belief, Defendant, falsely and with malice aforethought, has also spoken similar untruths regarding Plaintiff to local citizens, as well as her social media assault against him.
10. Plaintiff has suffered damages related to his reputation as a result of this. Furthermore, Defendant's lies about Plaintiff have caused a local stir. Resulting in other local residents harassing, stalking and threatening the life of Plaintiff. Plaintiff and his family have been placed in harms way by Defendants grossly negligent and intentional public accusations. Defendants actions have caused a barrage of libelous and slanderous conduct by many others, and relentless cyber bullying targeted at the Plaintiff.

FOR A FIRST CAUSE OF ACTION-DEFAMATION

(Slander/Libel)

11. All allegations of fact made previously are repeated as if set forth here verbatim.
12. Upon information and belief, Defendant has made multiple knowingly false statements, asserting that Plaintiff murdered or caused the death of his

wife, and provided those statements to multiple social media outlets and to other individuals.

13. The allegations by Defendant are defamatory and made with actual malice.
14. Upon information and belief, as a result of Defendant's libel, Plaintiff has been harmed and damages have been incurred, including but not limited to actual and future damage to reputation.

FOR A SECOND CAUSE OF ACTION-DEFAMATION

(Slander/Libel Per Se)

15. All allegations of fact made previously are repeated as if set forth here verbatim.
16. Upon information and belief, the unsubstantiated, spoken allegations by the Defendant were false and made with the expectation and intention of harming the Plaintiff and his reputation, and to deter third persons from associating or dealing with the Plaintiff.
17. Plaintiff is informed and believes that he is entitled to recover his consequential, nominal, actual, and special damages, costs, attorneys fees, and punitive damages from the Defendant upon a finding of Slander/ Libel per se.

FOR A THIRD CLAIM FOR RELIEF AND MOTION FOR PRELIMINARY AND

PERMANENT INJUNCTION

18. All allegations of fact made previously are repeated as if set forth here verbatim.
19. Plaintiff is informed and believes that all Social Media outlets, including but not limited to Facebook, Instagram, X, Tic Tac and Youtube will not remove the defamatory comments except upon the direction of Defendant.

wife, and provided those statements to multiple social media outlets and to other individuals.

13. The allegations by Defendant are defamatory and made with actual malice.
14. Upon information and belief, as a result of Defendant's libel, Plaintiff has been harmed and damages have been incurred, including but not limited to actual and future damage to reputation.

FOR A SECOND CAUSE OF ACTION-DEFAMATION

(Slander/Libel Per Se)

15. All allegations of fact made previously are repeated as if set forth here verbatim.
16. Upon information and belief, the unsubstantiated, spoken allegations by the Defendant were false and made with the expectation and intention of harming the Plaintiff and his reputation, and to deter third persons from associating or dealing with the Plaintiff.
17. Plaintiff is informed and believes that he is entitled to recover his consequential, nominal, actual, and special damages, costs, attorneys fees, and punitive damages from the Defendant upon a finding of Slander/ Libel per se.

FOR A THIRD CLAIM FOR RELIEF AND MOTION FOR PRELIMINARY AND

PERMANENT INJUNCTION

18. All allegations of fact made previously are repeated as if set forth here verbatim.
19. Plaintiff is informed and believes that all Social Media outlets, including but not limited to Facebook, Instagram, X, Tic Tac and Youtube will not remove the defamatory comments except upon the direction of Defendant.

20. Plaintiff will continue to suffer irreparable harm, damage, and injury unless the Defendant is compelled to stop defaming Plaintiff, and to remove from social media all defamatory statements published by Defendant.
21. Upon information and belief, Plaintiff is entitled to a preliminary and permanent injunction of this Court compelling Defendant to stop making these defamatory statements about Plaintiff, and to remove and forever delete those statements already made.
22. Plaintiff will be irreparably harmed in the absence of such injunctive relief.
23. A balancing of equities favors Plaintiff's request for injunctive relief.
24. Plaintiff is entitled to an Order awarding preliminary and permanent injunctive relief, as well as attorney's fees and costs for bringing this action.

PRAYER FOR RELIEF

WHEREFORE, having fully set forth his Complaint against the Defendant, the Plaintiff prays for the following relief:

- A. That the Court make findings and rulings on these matters in favor of the Plaintiff;
- B. That Plaintiff have and recover judgment against the Defendant in the amount of One Million (\$1,000,000.00) Dollars as will fully and fairly compensate Plaintiff for his actual, general and consequential damages as will be proven at trial of this action;
- C. That a hearing be scheduled for the granting of a Preliminary Injunction compelling Defendant to stop making false statements about the Plaintiff, and to remove the defamatory comments from all social media platforms where published;
- D. That upon a final hearing, grant Plaintiff a Permanent Injunction compelling Defendant to remove the defamatory comments for all social media platforms permanently;

- E. That Plaintiff have and recover from Defendant prejudgment interest; costs and reasonable attorney's fees incurred for bringing this action;
- F. That Plaintiff have and recover from Defendant an award for punitive damages in the amount of Five Million (\$5,000,000.00) Dollars.
- G. For such other relief as the Court deems just and proper.

Respectfully submitted.

s/Russell B. Long

Russell B. Long, Attorney for the Plaintiff
Russell B. Long, P.A.
5307 N. Kings Hwy
Myrtle Beach, SC. 29577
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ashely@rblongpa.com

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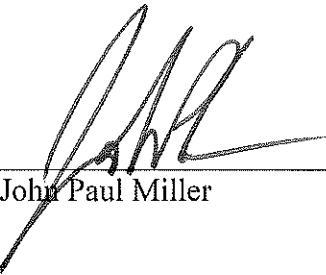
Defendant.

VERIFICATION

PERSONALLY appeared before me the Plaintiff, John Paul Miller, above named in the foregoing cause of action, who, being duly sworn, deposes and states:

1. That this Deponent has read all allegations contained in the attached pleadings;
2. That the attached pleadings were prepared by the Deponent's attorney based upon information this Deponent has personally furnished to said attorney;
3. That the allegations contained in the attached pleadings are true and correct, and are based upon the personal knowledge of this Deponent except for those allegations which are based upon this Deponents information and belief and as to those, this Deponent verily believes the same to be true;
4. That this Deponent has authorized said attorney to file the attached pleadings. To present the same to the Court and secure any necessary Order based thereon and to attach said pleadings and necessary process based thereon; and
5. That this Deponent understands that this Verification is sworn to and given under oath.

Dated: Sept. 16, 2024


John Paul Miller

SWORN TO before me this
16 day of September, 2024.


Notary Public for South Carolina

My Commission Expires: 2/6/34

Ashley S. Hein
S.C. Notary Public
My Commission Exp.
February 6th, 2034