

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

Jane Doe #1

Plaintiffs,

vs.

John-Paul Miller, Reginald Wayne Miller
a/k/a Reginal Wayne Miller, All Nations
Cathedral Church f/k/a Cathedral Baptist
Church of the Grand Strand, Inc., Solid
Rock Ministries, Inc.

Defendants.

COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
CASE NO.: 2025-CP-26-01517

SUMMONS
(Jury Trial Requested)

TO THE DEFENDANT NAMED ABOVE:

YOU ARE HEREBY SUMMONED and required to answer the Defendant's Counterclaim in this action which is herewith served upon you and to serve a copy of your Answer to the said Counterclaim 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
russelllonglaw@rblongpa.com

March 18, 2024
Myrtle Beach, South Carolina

STATE OF SOUTH CAROLINA)
COUNTY OF HORRY)

COURT OF COMMON PLEAS)
FIFTEENTH JUDICIAL CIRCUIT)
CASE NO.: 2025-CP-26-01517)

Jane Doe #1)

Plaintiffs,)

vs.)

Defendant John Paul Miller's Answers to
Plaintiff, Jane Doe #1's Complaint
and COUNTERCLAIM

John-Paul Miller, Reginald Wayne Miller)
a/k/a Reginal Wayne Miller, All Nations)
Cathedral Church f/k/a Cathedral Baptist)
Church of the Grand Strand, Inc., Solid)
Rock Ministries, Inc.)

Defendants.)

The Defendant, John-Paul Miller, by and through his undersigned counsel, hereby answering the Complaint of the above-named Plaintiff, and setting forth his defenses, respectfully alleges and would show unto this Honorable Court as follows:

FOR A FIRST DEFENSE

Each and every allegation of the Complaint not specifically admitted is herein expressly denied.

FOR A SECOND DEFENSE

1. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 1, and therefore denies the same and demands strict proof thereof.
2. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 2, and therefore denies the same and demands strict proof thereof.
3. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 3, and therefore denies the same and demands strict proof thereof.
4. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 4, and therefore denies the same and demands strict proof thereof.
5. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 5, and therefore denies the same and demands strict proof thereof.

6. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 6, and therefore denies the same and demands strict proof thereof.
7. Defendant, John Paul Miller admits the allegations contained in paragraph 7.
8. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 8, and therefore denies the same and demands strict proof thereof.
9. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 9, and therefore denies the same and demands strict proof thereof.
10. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 10, and therefore denies the same and demands strict proof thereof.
11. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 11, and therefore denies the same and demands strict proof thereof.
12. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 12, and therefore denies the same and demands strict proof thereof.
13. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 13, and therefore denies the same and demands strict proof thereof.
14. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 13, and therefore denies the same and demands strict proof thereof.
15. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 15, and therefore denies the same and demands strict proof thereof.
16. Defendant, John Paul Miller admits the allegations contained in paragraph 16.
17. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 17, and therefore denies the same and demands strict proof thereof.
18. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 18, and therefore denies the same and demands strict proof thereof.
19. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 19, and therefore denies the same and demands strict proof thereof.
20. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 20, and therefore denies the same and demands strict proof thereof.
21. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 21, and therefore denies the same and demands strict proof thereof.

22. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 22, and therefore denies the same and demands strict proof thereof.

23. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 23, and therefore denies the same and demands strict proof thereof.

24. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 24, and therefore denies the same and demands strict proof thereof.

25. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 25, and therefore denies the same and demands strict proof thereof.

26. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 26, and therefore denies the same and demands strict proof thereof.

27. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 27, and therefore denies the same and demands strict proof thereof.

28. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 28, and therefore denies the same and demands strict proof thereof.

29. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 29, and therefore denies the same and demands strict proof thereof. Defendant John Paul Miller turned eighteen (18) years old on May 20, 1997.

30. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 30, and therefore denies the same and demands strict proof thereof.

31. Defendant, John Paul Miller admits the allegations contained in paragraph 31.

32. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 32, and therefore denies the same and demands strict proof thereof.

33. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 33, and therefore denies the same and demands strict proof thereof.

34. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 34, and therefore denies the same and demands strict proof thereof.

35. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 35, and therefore denies the same and demands strict proof thereof.

36. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 36, and therefore denies the same and demands strict proof thereof.

37. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 37, and therefore denies the same and demands strict proof thereof.

38. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 38, and therefore denies the same and demands strict proof thereof.

39. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 39, and therefore denies the same and demands strict proof thereof.

40. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 40, and therefore denies the same and demands strict proof thereof.

41. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 41, and therefore denies the same and demands strict proof thereof.

42. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 42, and therefore denies the same and demands strict proof thereof.

43. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 43, and therefore denies the same and demands strict proof thereof.

44. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 44, and therefore denies the same and demands strict proof thereof.

45. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 45, and therefore denies the same and demands strict proof thereof.

46. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 46, and therefore denies the same and demands strict proof thereof.

47. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 47, and therefore denies the same and demands strict proof thereof.

48. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 48, and therefore denies the same and demands strict proof thereof.

49. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 49, and therefore denies the same and demands strict proof thereof.

50. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 50, and therefore denies the same and demands strict proof thereof.

51. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 51, and therefore denies the same and demands strict proof thereof.

52. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 52, and therefore denies the same and demands strict proof thereof.

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56. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 56, and therefore denies the same and demands strict proof thereof.

57. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 57, and therefore denies the same and demands strict proof thereof.

58. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 58, and therefore denies the same and demands strict proof thereof.

59. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 59, and therefore denies the same and demands strict proof thereof.

60. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 60, and therefore denies the same and demands strict proof thereof.

61. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 61, and therefore denies the same and demands strict proof thereof.

62. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 62, and therefore denies the same and demands strict proof thereof.

63. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 63, and therefore denies the same and demands strict proof thereof.

64. Defendant, John Paul Miller admits the allegations contained in paragraph 64.

65. Defendant, John Paul Miller admits the allegations contained in paragraph 65.

66. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 66, and therefore denies the same and demands strict proof thereof.

67. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 67, and therefore denies the same and demands strict proof thereof.

68. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 68, and therefore denies the same and demands strict proof thereof.

69. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 69, and therefore denies the same and demands strict proof thereof.

70. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 70, and therefore denies the same and demands strict proof thereof.

71. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 71, and therefore denies the same and demands strict proof thereof.

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79. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 79, and therefore denies the same and demands strict proof thereof.

80. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 80, and therefore denies the same and demands strict proof thereof.

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101. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 101, and therefore denies the same and demands strict proof thereof.

102. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 102, and therefore denies the same and demands strict proof thereof.

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107. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 107, and therefore denies the same and demands strict proof thereof.

108. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 108, and therefore denies the same and demands strict proof thereof.

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117. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 117, and therefore denies the same and demands strict proof thereof.

118. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 118, and therefore denies the same and demands strict proof thereof.

119. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 119, and therefore denies the same and demands strict proof thereof.

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130. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 130, and therefore denies the same and demands strict proof thereof.

131. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 131, and therefore denies the same and demands strict proof thereof.

132. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 132, and therefore denies the same and demands strict proof thereof.

133. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 133, and therefore denies the same and demands strict proof thereof.

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135. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 135, and therefore denies the same and demands strict proof thereof.

136. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 136, and therefore denies the same and demands strict proof thereof.

137. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 137, and therefore denies the same and demands strict proof thereof.

138. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 138, and therefore denies the same and demands strict proof thereof.

139. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 139, and therefore denies the same and demands strict proof thereof.

140. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 140, and therefore denies the same and demands strict proof thereof.

141. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 141, and therefore denies the same and demands strict proof thereof.

142. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 142, and therefore denies the same and demands strict proof thereof.

143. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 143, and therefore denies the same and demands strict proof thereof.

144. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 144, and therefore denies the same and demands strict proof thereof.

145. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 146, and therefore denies the same and demands strict proof thereof.

146. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 146, and therefore denies the same and demands strict proof thereof.

147. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 147, and therefore denies the same and demands strict proof thereof.

148. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 148, and therefore denies the same and demands strict proof thereof.

149. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 149, and therefore denies the same and demands strict proof thereof.

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151. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 151, and therefore denies the same and demands strict proof thereof.

152. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 152, and therefore denies the same and demands strict proof thereof.

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156. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 156, and therefore denies the same and demands strict proof thereof.

157. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 157, and therefore denies the same and demands strict proof thereof.

158. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 158, and therefore denies the same and demands strict proof thereof.

159. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 159, and therefore denies the same and demands strict proof thereof.

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161. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 161, and therefore denies the same and demands strict proof thereof.

162. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 162, and therefore denies the same and demands strict proof thereof.

163. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 163, and therefore denies the same and demands strict proof thereof.

164. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 164, and therefore denies the same and demands strict proof thereof.

165. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 165, and therefore denies the same and demands strict proof thereof.

166. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 166, and therefore denies the same and demands strict proof thereof.

167. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 167, and therefore denies the same and demands strict proof thereof.

168. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 168, and therefore denies the same and demands strict proof thereof.

169. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 169, and therefore denies the same and demands strict proof thereof.

170. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 170, and therefore denies the same and demands strict proof thereof.

171. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 171, and therefore denies the same and demands strict proof thereof.

172. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 172, and therefore denies the same and demands strict proof thereof.

173. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 173, and therefore denies the same and demands strict proof thereof.

174. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 174, and therefore denies the same and demands strict proof thereof.

175. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 175, and therefore denies the same and demands strict proof thereof.

176. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 176, and therefore denies the same and demands strict proof thereof.

177. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 177, and therefore denies the same and demands strict proof thereof.

178. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 178, and therefore denies the same and demands strict proof thereof.

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180. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 180, and therefore denies the same and demands strict proof thereof.

181. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 181, and therefore denies the same and demands strict proof thereof.

182. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 182, and therefore denies the same and demands strict proof thereof.

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185. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 185, and therefore denies the same and demands strict proof thereof. \

186. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 186, and therefore denies the same and demands strict proof thereof.

187. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 187, and therefore denies the same and demands strict proof thereof.

188. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 188, and therefore denies the same and demands strict proof thereof.

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199. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 199, and therefore denies the same and demands strict proof thereof.

200. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 200, and therefore denies the same and demands strict proof thereof.

201. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 201, and therefore denies the same and demands strict proof thereof.

202. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 202, and therefore denies the same and demands strict proof thereof.

203. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 203, and therefore denies the same and demands strict proof thereof.

204. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 204, and therefore denies the same and demands strict proof thereof.

205. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 205, and therefore denies the same and demands strict proof thereof.

206. Defendant John Paul Miller denies the allegations in Complaint number two hundred-six (206) and demands strict proof thereof.

207. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 207, and therefore denies the same and demands strict proof thereof.

208. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 208, and therefore denies the same and demands strict proof thereof.

209. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 209, and therefore denies the same and demands strict proof thereof.

210. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 210, and therefore denies the same and demands strict proof thereof.

211. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 211, and therefore denies the same and demands strict proof thereof.

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235. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 235, and therefore denies the same and demands strict proof thereof.

236. Defendant lacks information sufficient to form a belief as to the allegations contained in paragraph 236, and therefore denies the same and demands strict proof thereof.

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COUNTERCLAIM

GENERAL ALLEGATIONS OF FACT

Plaintiff has made public statements accusing Defendant of sexual abuse and misconduct. Such statements are slander and libel against Defendant. Plaintiff has made the same allegations by making social media appearances causing other social media platforms to further slander and libel Defendant based on Plaintiff's accusations. Defendant has suffered damages related to his reputation as a result of these accusations made by Plaintiff. Defendant has been placed in harms way by Plaintiffs grossly negligent and intentional public accusations. Plaintiff's actions have caused a barrage of libelous and slanderous conduct by many others and relentless cyber bullying targeted at Defendant.

FOR A FIRST CAUSE OF ACTION-DEFAMATION

(Slander/Libel)

Defendant realleges and reincorporates the above Paragraphs as if fully set forth herein verbatim.

1. Upon information and belief, Plaintiff has made multiple knowingly false statements, asserting Defendant engaged in sexual abuse and predatory conduct towards individuals, targeting minors.
2. Upon information and belief, Plaintiff has made multiple knowingly false statements, asserting Defendant used his position in power to manipulate and exploit vulnerable people.
3. Upon information and belief, Plaintiff has made multiple knowingly false statements, asserting Defendant built and maintained a system of sexual misconduct.
4. Upon information and belief, Plaintiff has made multiple knowingly false statements to the public about her interactions with Defendant.
5. The allegations made by Plaintiff are defamatory and made with actual malice.
6. Upon information and belief, as a result of Plaintiff's libel, Defendant has been harmed and damages have been incurred, including but not limited to actual and future damages to reputation.

FOR A SECOND CAUSE OF ACTION-DEFAMATION

(Slander/Libel Per Se)

Defendant realleges and reincorporates the above Paragraphs as if fully set forth herein verbatim.

7. Upon information and belief, the unsubstantiated, spoken allegations by Plaintiff were false and made with the expectation and intention of harming Defendant and his reputation, and to deter third persons from associating or dealing with Plaintiff.

8. Defendant is informed and believes that he is entitled to recover his consequential, nominal, actual and special damages costs, attorneys fees and punitive damages from Plaintiff upon a finding of Slander/Libel per se.

**FOR A THIRD CLAIM FOR RELIEF AND MOTION FOR PRELIMINARY AND
PERMANENT INJUNCTION**

Defendant realleges and reincorporates the above Paragraphs as if fully set forth herein verbatim.

9. Defendant is informed and believes that all Social Media outlets, including but not limited to Facebook, Instagram Tik Tok and Youtube will not remove the defamatory information except under the direction of Plaintiff.

10. Defendant will continue to suffer irreparable harm, damage and injury unless the Plaintiff is compelled to stop defaming Defendant, and to remove from social media all defamatory statements published by Plaintiff and to third parties that use social media for journalism.

11. Upon information and belief, Defendant is entitled to a preliminary and permanent injunction of this Court compelling Plaintiff to cease these defamatory statements about Defendant and to remove and forever delete any statements already made.

PRAYER FOR RELIEF

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

- A. That the Court make findings and rulings on these matters in favor of the Defendant;
- B. That Defendant have and recover judgment against the Plaintiff in an amount this Court deems just and proper to compensate Defendant 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 Plaintiff to cease making false statements about the Defendant, and to remove the defamatory comments from all social media platforms where published;
- D. That a final hearing grant Defendant a Permanent Injunction compelling Plaintiff to remove the defamatory comments for all social media platforms permanently.
- E. That Defendant have and recover from Plaintiff prejudgment interest; costs and reasonable attorney's fees incurred for this action;
- F. That Defendant have and recover from Plaintiff an award for punitive damages in an amount the Court deems just and proper;
- G. For such other relief as the Court deems just and proper.

Respectfully submitted.

s/Russell B. Long
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Myrtle Beach, South Carolina

