

CLERK OF COURT  
FAMILY COURT

**STATE OF SOUTH CAROLINA** ) **IN THE FAMILY COURT**  
 2022 JAN 12 PM 12:20 C.A. # 2022-DR-37-09  
**COUNTY OF OCONEE** )  
 )  
**James Lloyd,** )  
 Plaintiff, )  
 )  
 vs. ) **SUMMONS AND NOTICE**  
 )  
**Kendra Wilson,** )  
 Defendant. )

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You are hereby summoned and required to answer the Complaint in this action, a copy of which is attached hereto and herewith served upon you, and to serve a copy of your Answer to same upon the subscriber at [REDACTED] Greenville, South Carolina 29601, within thirty (30) days after the service of the same, exclusive of the day of such service. If you fail to answer said within the thirty day period, the Plaintiff(s) will apply to the Court for the relief demanded therein and judgment will be taken against you by default.

**IN THE EVENT YOU ARE AN INFANT OVER FOURTEEN YEARS OF AGE OR AN IMPRISONED PERSON**, you are further summoned and notified to apply for the appointment of a Guardian ad Litem to represent you in this action within thirty (30) days after the service of this Summons and Notice upon you. If you fail to do so, application for such appointment will be made by the Plaintiff(s) herein.

**IN THE EVENT YOU ARE AN INFANT UNDER FOURTEEN YEARS OF AGE OR ARE INCOMPETENT OR INSANE**, then you and the Guardian or committee are further summoned and notified to apply for the appointment of a Guardian ad Litem to represent said infant under fourteen years of age or said incompetent or insane person within thirty (30) days after the service of this Summons and Notice upon you. If you fail to do so, application for such appointment will be made by the Plaintiff(s) herein.

  
 Kimberly F. Dunham  
 215 Whitsett Street  
 Greenville, South Carolina 29601  
 864-282-8686  
 Attorney for the Plaintiff

Greenville, South Carolina

Dated: January 16, 2022

Written request for a final hearing in this case  
 must be delivered by a party or his/her attorney  
 to the Clerk of Court's office within 365 days of  
 this filing date. Failure to comply with this rule  
 shall result in the dismissal of the case by the Court  
 on 01/12/23

STATE OF SOUTH CAROLINA ) IN THE FAMILY COURT  
2022 JAN 12 PM 12:20 2022-DR-37-09  
COUNTY OF OCONEE )  
James Lloyd, )  
Plaintiff, )  
vs. )  
Kendra Wilson, )  
Defendants. )

---

**COMPLAINT**

The Plaintiff, complaining of the Defendant, would respectfully show as follows:

**I.**

The Defendant and minor child are citizens and residents of Oconee County, State of South Carolina and have resided therein for at least six (6) months prior to the commencement of this action. Plaintiff is a citizen and resident of Greenville County, State of South Carolina

**II**

Defendant, Kendra Wilson is the Mother of a minor child, K.W., born in 2020. The minor child was born out of wedlock. Connor Lloyd filed an action to establish paternity on October 26, 2020 (2020-DR-37-529). Paternity testing was conducted in the prior action and confirmed Connor Lloyd as Father of the minor child. Under a Second Temporary Order Connor Lloyd was granted a graduated visitation schedule due to the young age of the minor child. Connor Lloyd was murdered on August 18, 2021 only days before his first overnight visitation was to occur. His murder remains under investigation. Plaintiff is the paternal grandfather of K.W.

*Written request for a final hearing in this case must be delivered by a party or his/her attorney to the Clerk of Court's office within 365 days of his filing date. Failure to comply with this rule will result in the dismissal of the case by the Clerk.*

01/12/23

### III.

Since his granddaughter's birth Plaintiff has been unreasonably deprived of the opportunity to visit with his grandchild for periods of time in excess of ninety (90) days. At two separate hearings Defendant has submitted Affidavits to the Court stating how horrible Plaintiff and his Wife are. Defendant has been unwilling to agree to any **Court Ordered** grandparent visitation. Awarding grandparent visitation on a temporary and permanent basis will not interfere with the parent-child relationship and there are compelling reasons to award grandparent visitation in this matter. Without court intervention the minor child will be prevented from knowing her paternal family in any kind of meaningful manner.

### IV.

Plaintiff is informed and believes that the Defendant, should reimburse the Plaintiff the temporary and permanent attorney's fees and costs incurred by the Plaintiff.

**WHEREFORE**, Kimberly F. Dunham prays for the following relief:

- [1] That the Plaintiff should be granted temporary and permanent grandparent visitation with Cora.
- [2] That the Defendant be ordered to pay the Plaintiff's temporary and permanent attorney's fees and costs.
- [3] That the Plaintiff be granted such other and further relief as this court deems just and proper.



**Kimberly F. Dunham  
215 Whitsett Street  
Greenville, South Carolina 29601  
Phone: 864-282-8686  
Facsimile: 864-282-8688  
Attorney for the Plaintiff**

Greenville, South Carolina

Dated: January 10, 2022



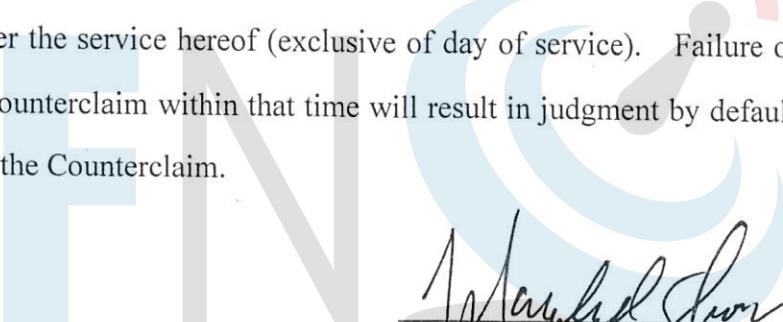
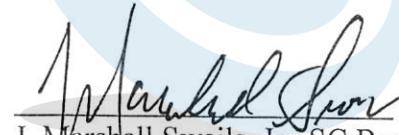
STATE OF SOUTH CAROLINA ) IN THE FAMILY COURT  
 ) TENTH JUDICIAL CIRCUIT  
COUNTY OF OCONEE )  
 )  
James Lloyd, )  
Plaintiff, )  
 )  
vs. )  
 )  
Kendra Leigh Wilson, )  
Defendant. ) Docket No: 2022-DR-37-09

**SUMMONS**

YOU ARE HEREBY SUMMONED and REQUIRED to answer the Counterclaim in this action, a copy of which is herewith served upon you, (which was filed in the Office of the Clerk of Court on the 18 day of May, 2022 and to serve a copy of your Reply or other responsive pleadings upon J. Marshall Swails, Jr., Attorney at Law, 8 Williams Street, Post Office Box 10261, Greenville, South Carolina, 29603, within thirty (30) days after the service hereof (exclusive of day of service). Failure on your part to answer the Counterclaim within that time will result in judgment by default for the relief demanded in the Counterclaim.

FILED OCONEE COUNTY, SC  
MELISSA C. BURTON  
CLERK OF COURT

2022 MAY 18 PM 3:35

  
  
J. Marshall Swails, Jr., SC Bar# 79067  
Attorney at Law  
Post Office Box 10261  
Greenville, SC 29603  
Phone: (864) 233-6225  
Facsimile: (864) 298-0033

Greenville, South Carolina  
Dated: 5/3/22

STATE OF SOUTH CAROLINA ) IN THE FAMILY COURT  
COUNTY OF OCONEE ) TENTH JUDICIAL CIRCUIT  
James Lloyd, )  
Plaintiff, )  
vs. ) ANSWER AND COUNTERCLAIM  
Kendra Leigh Wilson, )  
Defendant. ) Docket No: 2022-DR-37-09

2022 MAY 18 PM 3:35

FILED OCONEE COUNTY, SC  
MELISSA C. BURTON  
CLERK OF COURT

The defendant, answering the Complaint of plaintiff, would respectfully allege as follows:

1. Each and every allegation of the Complaint not hereinafter qualified, admitted or explained is denied and strict proof is demanded thereof.
2. The allegations contained in Paragraphs 1 and 2 of the Complaint are admitted.
3. The allegations contained in Paragraphs 3 and 4 of the Complaint are denied and strict proof is demanded thereof.

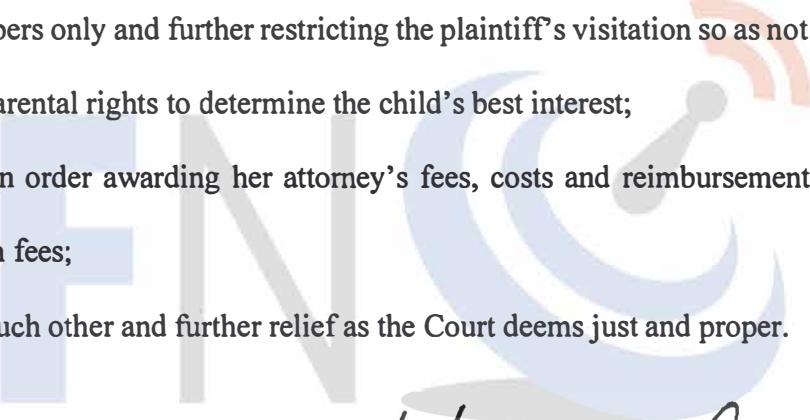
**FOR A SECOND DEFENSE AND BY WAY OF COUNTERCLAIM**

4. The allegations contained in the first defense are realleged and incorporated as if fully repeated herein.
5. The defendant would show that this Court lacks jurisdiction pursuant to South Carolina Code of Laws §63-3-530 (33) in that this defendant has not unreasonably deprived the grandparent of the opportunity to visit with the child. The defendant would therefore request that this matter be dismissed with costs.
6. The defendant would show that in the event this action is not dismissed, that any visitation granted to the plaintiff be restricted to plaintiff and his immediate family only and would further request that such visitation does not interfere with her parental rights to determine the best interest of the minor child.

7. The defendant would show that she has been required to retain the services of an attorney and has further been required to pay Guardian ad Litem fees, all of which are burdensome and contrary to the financial needs of the minor child. The defendant would therefore request that she be granted attorney's fees and reimbursement of Guardian ad Litem fees.

WHEREFORE, having fully pleaded, the defendant prays as follows:

1. For an order dismissing the Complaint of plaintiff and awarding this defendant with costs, attorney's fees and paid Guardian ad Litem fees;
2. For an order restricting the plaintiff's visitation to plaintiff's immediate family members only and further restricting the plaintiff's visitation so as not to interfere with her parental rights to determine the child's best interest;
3. For an order awarding her attorney's fees, costs and reimbursement of Guardian ad Litem fees;
4. For such other and further relief as the Court deems just and proper.



  
JLMarshall Swails, SC Bar#79067  
Attorney for Defendant  
Post Office Box 10261  
Greenville, South Carolina 29603  
Telephone: (864) 233-6225  
Facsimile: (864) 298-0033

Greenville, South Carolina  
Dated: 5/3/22