

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
CASE NO.: 2025-CP-26-01796

Jane Doe #2

Plaintiffs,

vs.

SUMMONS
(Jury Trial Requested)

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., Cathedral Hall
Academy f/k/a Grand Strand Academy

Defendants.

TO THE PLAINTIFF 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

April 29, 2025

Myrtle Beach, South Carolina
 STATE OF SOUTH CAROLINA
 COUNTY OF HORRY

COURT OF COMMON PLEAS
 FIFTEENTH JUDICIAL CIRCUIT
 CASE NO.: 2025-CP-26-01796

Jane Doe #2

Plaintiffs,

vs.

**DEFENDANT JOHN PAUL MILLER'S
 ANSWERS TO PLAINTIFF'S COMPLAINT
 AND DEFENDANT'S COUNTERCLAIM
 TO PLAINTIFF**

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.
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COUNTERCLAIM

GENERAL ALLEGATIONS OF FACT

Plaintiff has made statements accusing Defendant of sexual abuse and misconduct through this lawsuit against Defendant. Such statements are slander and libel against Defendant. Defendant has never met the Plaintiff personally and 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 due to this lawsuit.

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 through this lawsuit.
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. The allegations made by Plaintiff are defamatory and made with actual malice.
5. 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.

6. 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 Defendant.

7. 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.

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 Defendant have and recover from Plaintiff prejudgment interest; costs and reasonable attorney's fees incurred for this action;
- D. That Defendant have and recover from Plaintiff an award for punitive damages in an amount the Court deems just and proper;
- E. For such other relief as the Court deems just and proper.

Respectfully submitted.

s/Russell B. Long
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April 29, 2025
Myrtle Beach, South Carolina