

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF HAMPTON)	
)	Civil Action No: 2019-CP-25-00111
Renee S. Beach, as Personal Representative)	
of the Estate of Mallory Beach,)	
)	
Plaintiff,)	
vs.)	VERIFIED PROOF OF CLAIM FOR
)	PETERS, MURDAUGH, PARKER,
Gregory M. Parker, Inc. d/b/a Parker’s)	ELTZROTH, AND DETRICK, P.A.
Corporation, Richard Alexander Murdaugh,)	
Richard Alexander Murdaugh, Jr., John)	
Marvin Murdaugh, as P.R. of the Estate of)	
Margaret Kennedy Branstetter Murdaugh,)	
and Randolph Murdaugh, IV, as P.R. of the)	
Estate of Paul Terry Murdaugh,)	
)	
Defendants.)	

Mark Ball, as Treasurer of the firm known as Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. (the “Claimant”), by and through the undersigned attorneys, hereby submits the following Verified Proof of Claim pursuant to Paragraph 7 of the Order Entering Scheduling Order and Appointing Special Referee to Administer the Claims Process filed on September 19, 2023, in Civil Action No.: 2019-CP-25-00111.

1. A statement of the nature of the claim and the monetary value of the claimed damages or judgment.

Defendant Richard Alexander Murdaugh’s (“Murdaugh”) personally engaged in an extensive scheme of intricate financial crimes to the detriment of his clients and law firm. Claimant files this Verified Proof of Claim based on all equitable maxims and to the extent applicable through an action at law and/or equity in support of the recoupment of the costs incurred by Claimant as a result of Murdaugh’s illegal schemes of stealing money rightfully owed to clients and for stealing money owed to Claimant. As a result of Murdaugh’s illegal conduct, Claimant, and in some incidents Claimant’s insurance companies, reimbursed affected clients to make them whole for the actions of Murdaugh. The Claimant also incurred other expenses as detailed in the attached spreadsheet. The attached spreadsheet documents the losses incurred by Claimant due to Murdaugh’s illegal conduct. In total, Claimant incurred over \$14 million attributable to Murdaugh’s illegal conduct. Claimant requests a fraction of that amount, as set forth in the attached documentation, as it proceeds in equity and at law to reimbursement.

2. The date of the loss.

Murdaugh began schemes to defraud Clients and the Claimant dating back to at least 2005. The Claimant discovered the first of these schemes on September 2 and 3, 2021. After discovering the

actions of Murdaugh, the Claimant took it upon itself to address and repay the clients that Murdaugh defrauded. These payments, expenses, money misappropriated, as well as money stolen from the Claimant, represent the amount owed to the Claimant from the Receivership.

3. A statement of any and all amounts received to date in satisfaction or partial satisfaction of the damages underlying the claim.

Claimant refers to the attached spreadsheet to document the amounts received in satisfaction or partial satisfaction of the losses incurred by Claimant as a result of Murdaugh's illegal conduct. Moreover, the Claimant in equity has offered offsets of certain money it has received as fees from unrelated cases, to offset its claim.

4. Reasonably sufficient evidence to substantiate the claim and claimed damages, including, but not limited to a sworn affidavit of the Claimants attesting to the validity and accuracy of the submitted Claim.

Claimant has provided herein, an affidavit from Mark Ball, as the Treasurer and Representative of Claimant, attesting to the validity and accuracy of the submitted Claim, as well as the undersigned verify the claims.

5. Additional evidence in support of the claim.

Claimant will provide additional supporting documentation to the Receivers as it contains personal identifying information of numerous individuals. The Claimant has previously submitted some if not all of this information to the United State District Court for South Carolina, S.C Attorney General, South Carolina Law Enforcement Division, U.S. Attorney for South Carolina as well as other investigative authorities.

Respectfully submitted,

s/Jim May

Wallace K. Lightsey (SC Bar # 6476)

Matthew T. Richardson (SC Bar # 15647)

Jim May (SC Bar # 74278)

Brian R. Critzer (SC Bar # 103159)

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*Attorneys for Claimant Peters, Murdaugh,
Parker, Eltzroth and Detrick, P.A.*

October 27, 2023

Columbia, South Carolina

<p>STATE OF SOUTH CAROLINA COUNTY OF HAMPTON</p> <p>Renee S. Beach, as Personal Representative of the Estate of Mallory Beach,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>Gregory M. Parker, Inc. d/b/a Parker's Corporation, Richard Alexander Murdaugh, Richard Alexander Murdaugh, Jr., John Marvin Murdaugh, as P.R. of the Estate of Margaret Kennedy Branstetter Murdaugh, and Randolph Murdaugh, IV, as P.R. of the Estate of Paul Terry Murdaugh,</p> <p style="text-align: center;">Defendants.</p>	<p>IN THE COURT OF COMMON PLEAS FOURTEENTH JUDICIAL CIRCUIT CIVIL ACTION No: 2019-CP-25-00111</p> <p style="text-align: center;">AFFIDAVIT OF CLAIMANT PETERS, MURDAUGH, PARKER, ELTZROTH, AND DETRICK, P.A.</p>
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PERSONALLY, appeared before me, the undersigned Notary Public, the Claimant, MARK BALL, as Treasurer of the firm formerly known as Peters, Murdaugh, Parker, Eltzroth, and Detrick, P.A. who being duly sworn stated as follows:

1. I am a competent adult over the age of eighteen and can testify to the following of my own personal knowledge.
2. I am a citizen and resident of Colleton County, South Carolina.
3. That I have read the attached **Proof of Claim with attachment** and based on the best of my knowledge, know, and understand the contents thereof; that the same is true and accurate based on my personal knowledge.
4. That I make these true and accurate statements of my own free will, under the penalty of perjury, and that I am not under the influence of any medication, drugs, alcohol, or duress of any type.
5. That prior to signing this Affidavit, I personally reviewed the unredacted Loss Summary Attachment; that the figures contained therein, are complete and accurate to the best of my knowledge.

FURTHERMORE, THE CLAIMANT SAYETH NOT.



A handwritten signature in blue ink, appearing to be "Mark Ball", written over a horizontal line.

Mark Ball

SWORN TO before me this
27th day of October, 2023

A handwritten signature in blue ink, appearing to be "Jeanne Seckinger", written over a horizontal line.

Notary Public for South Carolina
My commission Expires: 11-14-27

COURTESY OF
LUNA SHARK MEDIA

Peters, Murdaugh, Parker, Eitzroth, and Detrick, P.A.

Client	PMPED \$Stolen	Payments to Clients for Funds Stolen	Costs Incurred by PMPED due to RAM Actions	Prejudgment Interest	Total \$ Incurred	Insurance Payments	Repayments to Firm	Total Reductions	Net Loss Incurred by PMPED	*Fees Credited	Net Amount Requested by PMPED	***Restitution Ordered
[REDACTED]	\$ 77,000.00	\$ 148,073.46			\$ 225,073.46			\$ -	\$ 225,073.46	\$ 119,383.43	\$ 105,690.03	
[REDACTED]	\$ 1,358.52	\$ 354,334.48			\$ 355,693.00			\$ -	\$ 355,693.00	\$ 188,666.62	\$ 167,026.38	
[REDACTED]	\$ 114,789.17	\$ 60,411.66			\$ 175,200.83			\$ -	\$ 175,200.83	\$ 92,929.99	\$ 82,270.84	
[REDACTED]		\$ 15,893.58			\$ 15,893.58			\$ -	\$ 15,893.58	\$ 8,430.27	\$ 7,463.31	
[REDACTED]		\$ 112,500.00		\$ 60,000.00	\$ 172,500.00			\$ -	\$ 172,500.00	\$ 91,497.42	\$ 81,002.58	
[REDACTED]	\$ 300,000.00	\$ 450,000.00		\$ 60,000.00	\$ 810,000.00			\$ -	\$ 810,000.00	\$ 429,640.06	\$ 380,359.94	
[REDACTED]		\$ 608,056.14			\$ 608,056.14			\$ -	\$ 608,056.14	\$ 322,525.04	\$ 285,531.10	
[REDACTED]	\$ 46,787.80	\$ 136,740.20			\$ 183,528.00			\$ -	\$ 183,528.00	\$ 97,346.89	\$ 86,181.11	
[REDACTED]		\$ 7,500.00			\$ 7,500.00			\$ -	\$ 7,500.00	\$ 3,978.15	\$ 3,521.85	
[REDACTED]		\$ 28,400.00		\$ 21,000.00	\$ 49,400.00			\$ -	\$ 49,400.00	\$ 26,202.74	\$ 23,197.26	
[REDACTED]		\$ 169,333.34			\$ 169,333.34			\$ -	\$ 169,333.34	\$ 89,817.76	\$ 79,515.58	
[REDACTED]		\$ 50,000.00			\$ 50,000.00			\$ -	\$ 50,000.00	\$ 26,520.99	\$ 23,479.01	
[REDACTED]		\$ 95,541.17		\$ 60,000.00	\$ 155,541.17			\$ -	\$ 155,541.17	\$ 82,502.12	\$ 73,039.05	
[REDACTED]		\$ 102,500.00		\$ 60,000.00	\$ 162,500.00	\$ 26,989.21		\$ 26,989.21	\$ 135,510.79	\$ 71,877.61	\$ 63,633.18	
[REDACTED]		\$ 150,000.00		\$ 100,000.00	\$ 250,000.00	\$ 100,000.00		\$ 100,000.00	\$ 150,000.00	\$ 79,562.97	\$ 70,437.03	
[REDACTED]		\$ 294,210.06			\$ 294,210.06			\$ -	\$ 294,210.06	\$ 156,054.85	\$ 138,155.21	
[REDACTED]		\$ 19,500.00			\$ 19,500.00			\$ -	\$ 19,500.00	\$ 10,343.19	\$ 9,156.81	
[REDACTED]		\$ 9,569.30			\$ 9,569.30			\$ -	\$ 9,569.30	\$ 5,075.75	\$ 4,493.55	
[REDACTED]	\$ 50,000.00	\$ 75,000.00			\$ 125,000.00			\$ -	\$ 125,000.00	\$ 66,302.48	\$ 58,697.52	
[REDACTED]		\$ 30,000.00			\$ 30,000.00			\$ -	\$ 30,000.00	\$ 15,912.59	\$ 14,087.41	
[REDACTED]	\$ 100,000.00				\$ 100,000.00			\$ -	\$ 100,000.00	\$ 53,041.98	\$ 46,958.02	
[REDACTED]		\$ 89,133.44		\$ 500,000.00	\$ 589,133.44	\$ 500,000.00		\$ 500,000.00	\$ 89,133.44	\$ 47,278.14	\$ 41,855.30	\$ 89,133.44

Client	PMPED \$Stolen	Payments to Clients for Funds Stolen	Costs Incurred by PMPED due to RAM Actions	Prejudgment Interest	Total \$ Incurred	Insurance Payments	Repayments to Firm	Total Reductions	Net Loss Incurred by PMPED	*Fees Credited	Net Amount Requested by PMPED	***Restitution Ordered
		\$ 1,360,000.00			\$ 1,360,000.00		\$ 680,000.00	\$ 680,000.00	\$ 680,000.00	\$ 360,685.49	\$ 319,314.51	\$ 680,000.00
		\$ 350,245.08		\$ 250,000.00	\$ 600,245.08	\$ 250,000.00		\$ 250,000.00	\$ 350,245.08	\$ 185,776.94	\$ 164,468.14	\$ 350,245.08
		\$ 369,581.46			\$ 369,581.46			\$ -	\$ 369,581.46	\$ 196,033.34	\$ 173,548.12	\$ 369,581.46
	\$ 792,000.00				\$ 792,000.00		\$ 792,000.00	\$ 792,000.00	\$ -	\$ -	\$ -	
				\$ 10,000.00	\$ 10,000.00	\$ 10,000.00		\$ 10,000.00	\$ -	\$ -	\$ -	
		\$ 3,900,000.00			\$ 3,900,000.00	\$ 3,875,000.00		\$ 3,875,000.00	\$ 25,000.00	\$ 13,260.50	\$ 11,739.50	
**2021 Chevrolet Suburban			\$ 70,306.00		\$ 70,306.00			\$ -	\$ 70,306.00	\$ 37,291.70	\$ 33,014.30	
Personal Credit Card Charges	\$ 17,236.52				\$ 17,236.52			\$ -	\$ 17,236.52	\$ 9,142.59	\$ 8,093.93	
Case Resolution Payments			\$ 372,821.63		\$ 372,821.63			\$ -	\$ 372,821.63	\$ 197,751.99	\$ 175,069.64	
Professional Fees Paid			\$ 2,078,025.05		\$ 2,078,025.05	\$ 588,010.79		\$ 588,010.79	\$ 1,490,014.26	\$ 790,333.11	\$ 699,681.15	\$ 102,100.77
Miscellaneous Exp Incurred			\$ 3,015.26		\$ 3,015.26			\$ -	\$ 3,015.26	\$ 1,599.35	\$ 1,415.91	
Totals	\$ 1,499,172.01	\$ 8,986,523.37	\$ 2,524,167.94	\$ 1,121,000.00	\$ 14,130,863.32	\$ 5,350,000.00	\$ 1,472,000.00	\$ 6,822,000.00	\$ 7,308,863.32	\$ 3,876,766.06	\$ 3,432,097.26	\$ 1,591,062.85

* As of 9/3/21, RAM was not entitled to any additional compensation from PMPED because of his disloyalty and dishonesty. The amounts in this column reflects fees he may have been entitled to but for his criminal, immoral, unethical, and disloyal conduct.

** The 2021 Chevrolet Suburban was purchased by the firm for RAM in December 2021. The vehicle has been seized by SLED since June 2021.

*** Restitution totaling \$1,591,062.85 has been ordered payable to PMPED from US v Fleming and US v Laffitte. RAM is jointly and severally liable for these amounts.

is currently pending litigation. \$70,000 has been paid by the firm by way of interpleader with the court. These amount is not reflected in these figures. PMPED will alert the receivers on the disposition of the matter.

Fees Credited:		
PMPED	1/1/21 to 8/31/21 (less overhead)	\$ 602,508.17
PMPED	9/1/21 to 12/31/21	\$ 974,637.21
PMPED	Year 2022	\$ 1,882,071.21
PMPED	YTD 9/19/23	\$ 81,397.03
PLG	Year 2022	\$ 187,287.23
PLG	YTD 9/19/23	\$ 148,865.21
Total Fees Credited		\$ 3,876,766.06