

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

MICA A. MILLER,
PLAINTIFF,

V.

JOHN-PAUL MILLER,
DEFENDANT.

IN THE FAMILY COURT
FOR THE
FIFTEENTH JUDICIAL CIRCUIT

CASE NO.: 2024-DR-26-0860

NOTICE OF REPRESENTATION

TO: THE HORRY COUNTY CLERK OF COURT AND THE ATTORNEY FOR
PLAINTIFF, REGINA B. WARD, ESQ.

PURSUANT to Rule 8 of the South Carolina Rules of Family Court, you are hereby notified that the undersigned will appear for and represent Defendant, John-Paul Miller, in the above-referenced action.



Brana J. Williams
Ryan A. Stampfle
Joi Y. Page
Katlin M. Floyd
Attorneys for Defendant

INDIGO FAMILY LAW, LLC
2055 Glens Bay Road
Surfside Beach South Carolina 29575
843-215-6100 Fax: 843-215-6105

Dated this 23rd day of May 2024
in Surfside Beach, South Carolina

STATE OF SOUTH CAROLINA)
)
 COUNTY OF HORRY)
)
 SIERRA FRANCIS, ON BEHALF)
 OF MICA ACACIA MILLER AND)
 AS THE SPECIAL)
 ADMINISTRATOR FOR THE)
 ESTATE OF MICA ACACIA)
 MILLER,)
 Plaintiff,)
)
 v.)
)
 JOHN-PAUL MILLER and SOLID)
 ROCK MINISTRIES, INC., d/b/a)
 SOLID ROCK CHURCH AT)
 MARKET COMMON, a/k/a SOLID)
 ROCK @ MARKET COMMON,)
 a/k/a SOLID ROCK CHURCH,)
 Defendants.)

IN THE FAMILY COURT OF THE
 FIFTEENTH JUDICIAL CIRCUIT

LIS PENDENS
Tax Map: 185-24-01-070
PIN: 441-15-04-0012

FILE NO: 2024-DR-26-00860

FILED
 HORRY COUNTY
 2024 MAY 16 PM 4:15
 RENEE N. DENNIS
 CLERK OF COURT
 HORRY COUNTY, SC

TO THE DEFENDANTS ABOVE-NAMED:

NOTICE IS HEREBY GIVEN that an action has been commenced within the statutory time period in the Family Court of the Fifteenth Judicial Circuit upon Complaint of the above-named Plaintiff against the above-named Defendant in an action involving the property described herein below:

Address: [REDACTED]
 Myrtle Beach, SC 29588

Description: All that certain piece, parcel or tract of land situate, lying and being located in Socastee Township, Horry County, South Carolina, being shown and designated as Lot 48, Cascades at Azalea Lakes, Phase II, on a survey entitled "Final Subdivision Plat of Cascades At Azalea Lakes Phase II", prepared by ETS Engineering and Technical Services, Inc., dated March 24, 2004, and recorded May 13, 2004 in Plat Book 197 at Page 115, in the Office of the Register of Deeds for Horry County, South Carolina.

SUBJECT to that certain Declaration of Covenants and Restrictions for Cascades At Azalea Lakes dated February 11, 2004, and recorded February 12, 2004 in the Office of the Register of Deeds for Horry County in Deed Book 2696 at Page 1126, as amended by First Amendment dated September 8, 2004, and recorded September 8, 2004 in Deed Book 2789 at Page 618.

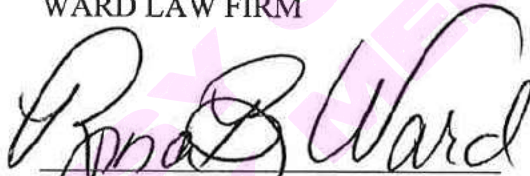
RCAM/RED

This being the identical property conveyed unto John-Paul Miller and Kirk Hanna by deed of Ronald James Cote and Priscilla C. Cote, recorded on January 14, 2016, in Deed Book 3885 at Page 2818, in the Office of the Register of Deeds of Horry County, South Carolina.

This being the identical property conveyed unto John-Paul Miller herein by Deed from John-Paul Miller and Kirk Hanna, recorded on November 18, 2020, in Deed Book 4363 at Page 1842, in the Horry County Register of Deeds Office.

This being the identical property conveyed unto Solid Rock Ministries, Inc., by deed of John-Paul Miller, recorded on December 18, 2023, in Deed Book 4756 at Page 1987, in the Office of the Register of Deeds of Horry County, South Carolina.

WARD LAW FIRM



REGINA B. WARD, ESQ.

S.C. Bar No.: 73-718

Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC

9007 Highway 544

Myrtle Beach, South Carolina 29588

Office: (843) 488-WARD (9273)

www.AttorneyReginaWard.com

Date: 5/15/2024

STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

SIERRA FRANCIS, AS THE SPECIAL)
ADMINISTRATOR FOR THE ESTATE OF)
MICA ACACIA MILLER,)
)
Plaintiff,)


AFFIDAVIT OF SERVICE

v.)

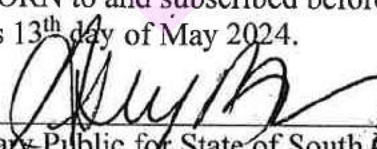
JOHN-PAUL MILLER and SOLID ROCK)
MINISTRIES, INC., d/b/a SOLID ROCK)
CHURCH AT MARKET COMMON, a/k/a)
SOLID ROCK @ MARKET COMMON,)
and a/k/a SOLID ROCK CHURCH,)
)
Defendants.)

FILE NO.: 2024-DR-26-00860

PERSONALLY APPEARED before me, the undersigned Herb McCandless, Jr., who
deposes and states that he is over the age of eighteen (18) and not a party to this action, and hereby
certifies that on the 7th day of May, 2024, at 7:12 p.m., he served Solid Rock Ministries through
their Registered Agent, John-Paul Miller, by hand delivering a clocked copy of Summons to
Amended Complaint, Amended Complaint, Amended Motion for Temporary Relief and Notice of
Temporary Hearing scheduled for June 5, 2024, at 2:30 p.m., at his residence located at 246
Coldwater Circle, Myrtle Beach, SC 29588.


Herb McCandless, Jr.

SWORN to and subscribed before me
This 13th day of May 2024.


Notary Public for State of South Carolina
My Commission Expires: 2/22/30



FILED
HORRY COUNTY
2024 MAY 13 P 4:23
RENEEN N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

SCANNED


STATE OF SOUTH CAROLINA)
)
 COUNTY OF HORRY)
)
 SIERRA FRANCIS, AS THE SPECIAL)
 ADMINISTRATOR FOR THE ESTATE OF)
 MICA ACACIA MILLER,)
)
 Plaintiff,)
)
 v.)
)
 JOHN-PAUL MILLER and SOLID ROCK)
 MINISTRIES, INC., d/b/a SOLID ROCK)
 CHURCH AT MARKET COMMON, a/k/a)
 SOLID ROCK @ MARKET COMMON,)
 and a/k/a SOLID ROCK CHURCH,)
)
 Defendants.)

IN THE FAMILY COURT OF THE
 FIFTEENTH JUDICIAL CIRCUIT

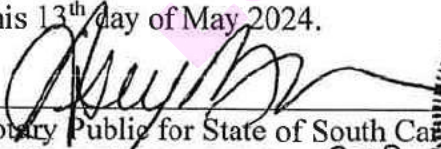
AFFIDAVIT OF SERVICE

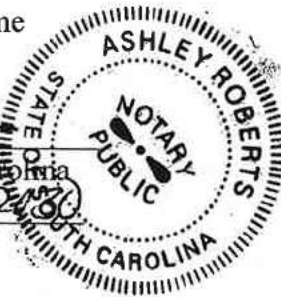
FILE NO.: 2024-DR-26-00860

PERSONALLY APPEARED before me, the undersigned Herb McCandless, Jr., who deposes and states that he is over the age of eighteen (18) and not a party to this action, and hereby certifies that on the 7th day of May, 2024, at 7:12 p.m., he served John-Paul Miller personally by hand delivering a clocked copy of Summons to Amended Complaint, Amended Complaint and Amended Motion for Temporary Relief, at his residence located at 246 Coldwater Circle, Myrtle Beach, SC 29588.


 Herb McCandless, Jr.

SWORN to and subscribed before me
 This 13th day of May 2024.


 Notary Public for State of South Carolina
 My Commission Expires: 2-12-2030



FILED
 HORRY COUNTY
 2024 MAY 13 P 4:23
 RENE E. ELVIS
 CLERK OF COURT
 HORRY COUNTY, SC

SCANNED

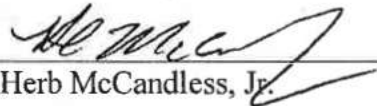
STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)
)
SIERRA FRANCIS, AS THE SPECIAL)
ADMINISTRATOR FOR THE ESTATE OF)
MICA ACACIA MILLER,)
)
Plaintiff,)
)
v.)
)
JOHN-PAUL MILLER,)
)
Defendant.)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

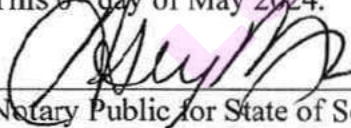
AFFIDAVIT OF SERVICE

FILE NO.: 2024-DR-26-00860

PERSONALLY APPEARED before me, the undersigned James Franklin Cole., who deposes and states that he is over the age of eighteen (18) and not a party to this action, and hereby certifies that on the **6th day of May, 2024, at 1:15 p.m.**, he served John-Paul Miller personally a copy of the Certificate of Appointment of Special Administrator associated with Horry County Probate Court Case Number: 2024-ES-26-01446, a clocked copy of the Supplemental Complaint, Plaintiff's First Set of Interrogatories to Defendant, and Plaintiff's First Set of Requests for Production of Documents, at his residence located at 246 Coldwater Circle, Myrtle Beach, SC 29588.


Herb McCandless, Jr.

SWORN to and subscribed before me
This 6th day of May 2024.


Notary Public for State of South Carolina
My Commission Expires: 2-12-2030



SCANNED

STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)
)
SIERRA FRANCIS, ON BEHALF OF)
MICA ACACIA MILLER AND AS)
THE SPECIAL ADMINISTRATOR)
FOR THE ESTATE OF MICA)
ACACIA MILLER,)

Plaintiff)

v.)

JOHN-PAUL MILLER and SOLID)
ROCK MINISTRIES, INC., d/b/a)
SOLID ROCK CHURCH AT)
MARKET COMMON, a/k/a SOLID)
ROCK @ MARKET COMMON, and)
a/k/a SOLID ROCK CHURCH,)

Defendants.)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

AMENDED
NOTICE OF MOTION
AND
MOTION FOR
TEMPORARY RELIEF

RENEE M. EVANS
CLERK OF COURT
1501 MARKET COMMON
CONWAY, SC 29526

2024 MAY -7 P 4:45

FILED
HORRY COUNTY

FILE NO.: 2024-DR-26-00860

**TO THE ABOVE-NAMED DEFENDANTS, JOHN-PAUL MILLER AND
SOLID ROCK MINISTRIES, INC.:**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, through her attorney, Regina B. Ward, Esq., will move before the presiding Judge of the Family Court at the Horry County Courthouse, Conway, South Carolina on June 5, 2024, at 2:30 p.m. before the Honorable Jan Bromell-Holmes at the Horry County Family Court located on the 2nd floor of 1301 2nd Avenue, Conway, SC 29526 for a Temporary Order granting the herein requested relief.

Based upon the pleadings which have been filed in this matter, Plaintiff hereby moves before this Honorable Court for a hearing *pendente lite* to determine the following issues:

1. Property in Possession of Robeson County Police: Granting Plaintiff Special Administrator possession of all of Wife's personal property taken into evidence by the Robeson County Police and/or any other law enforcement agency associated with the investigation of the death of Plaintiff Wife Mica Miller; such property consisting of her cell phone, purse and contents, her vehicle, clothing and any other property taken into evidence.
2. Vehicles: Granting Plaintiff Special Administrator possession of the two vehicles Plaintiff Wife normally drove and requiring Defendant Husband to pay for all liens, taxes, maintenance, and insurance for vehicles;
3. Personal Property: Granting Plaintiff Special Administrator possession of Wife's personal cell phone Plunge Ice Bath, Apple AirPods, Apple TV, iPhone, Laptop, Apple Watch, and her firearms;
4. Restraining Orders: Granting the restraining orders as to person, property, and debt for the protection of the Plaintiff as requested in the Complaint and set forth below:
 - a. Persons: Restraining Defendant from coming about, abusing, harming, harassing, communicating, threatening, or otherwise interfering with Plaintiff Special Administrator, immediate family members, and Plaintiff wife's close friends in any manner whatsoever, including via electronic means, social media, and third parties;
 - b. Restraining Order-Dissemination: Restraining Defendant from sharing any photos, videos, or communication, including private and/or provocative photos, private and/or provocative videos, and/or private and

provocative communication, of the Plaintiff with any third party via social media, text message, or email, or any other means whether it be directly, anonymously, or indirectly by way of third party;

- c. Property: Restraining and enjoining Defendant from disposing, encumbering, transferring, selling, hypothecating, pledging, destroying, or otherwise altering the status or value of any marital asset in any manner, pending a Final Order of this Court; further requiring Defendant to account for any and all marital and/or non-marital assets which Defendant has in any way depleted, liquidated, altered, transferred, or encumbered for the past three years; and
 - d. Restraining Order-Debts: Restraining Defendant from incurring any bills or obligations for services, property, or any other matter in the name of Plaintiff and holding Defendant solely and exclusively responsible for any and all debts currently in Defendant's name and hold Plaintiff harmless on same.
5. Advanced Costs of Forensic Evaluator: Requiring the Defendants to pay in advance the costs of a forensic accountant evaluation;
 6. Attorney's Fees/Costs: Requiring Defendants to pay all of Plaintiff attorney's fees, suit monies and court costs incurred by the Plaintiff; and
 7. Equitable Relief: For such other and further relief as this Court may deem just and proper.

I SO MOVE.

WARD LAW FIRM



REGINA B. WARD, ESQ.
S.C. Bar No.: 73-718
Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, South Carolina 29588
O: 843-488-WARD (9273)
F: 843-488-9272
www.AttorneyReginaWard.com

Date: 5/7/2024

COURTESY
LUNA SHARK MEDIA

STATE OF SOUTH CAROLINA

COUNTY OF Horry

SIERRA FRANCIS, ON BEHALF OF MICA ACACIA MILLER AND AS THE SPECIAL ADMINISTRATOR FOR THE ESTATE OF MICA ACACIA MILLER,

Plaintiff

v.

JOHN-PAUL MILLER and SOLID ROCK MINISTRIES, INC., d/b/a SOLID ROCK CHURCH AT MARKET COMMON, a/k/a SOLID ROCK @ MARKET COMMON, and a/k/a SOLID ROCK CHURCH,

Defendants.

IN THE FAMILY COURT OF THE FIFTEENTH JUDICIAL CIRCUIT

SUMMONS TO AMENDED COMPLAINT

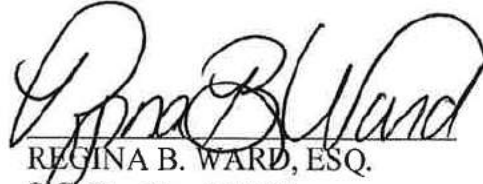
FILE NO.: 2024-DR-26-00860

TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to Answer the Amended Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Amended Complaint on the subscriber, or subscribers, at her office at 9007 Hwy 544, Myrtle Beach, South Carolina 29588, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to Answer the Amended Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Amended Complaint.

SCANNED

WARD LAW FIRM



REGINA B. WARD, ESQ.
S.C. Bar No.: 73-718
Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, South Carolina 29588
O: 843-488-WARD (9273)
F: 843-488-9272
www.AttorneyReginaWard.com

Date: 5/7/2024

COURTESY
LUNA SHARK MEDIA

STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)
)
SIERRA FRANCIS, ON BEHALF OF)
MICA ACACIA MILLER AND AS)
THE SPECIAL ADMINISTRATOR)
FOR THE ESTATE OF MICA)
ACACIA MILLER,)

Plaintiff)

v.)

JOHN-PAUL MILLER and SOLID)
ROCK MINISTRIES, INC., d/b/a)
SOLID ROCK CHURCH AT)
MARKET COMMON, a/k/a SOLID)
ROCK @ MARKET COMMON, and)
a/k/a SOLID ROCK CHURCH,)

Defendants.)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

AMENDED COMPLAINT
(Add Third Party Defendant)

FILE NO.: 2024-DR-26-00860

Plaintiff, complaining of the Defendants herein, would respectfully show unto this Honorable Court as follows:

JURISDICTION / VENUE

1. Plaintiff, Sierra Francis, is the duly appointed Special Administrator for the Estate of Mica Acacia Miller, who passed away on April 27, 2024. (Attached Exhibit A – *Certificate of Appointment of Special Administrator*)

2. Plaintiff Mica Acacia Miller (Wife) and Defendant John-Paul Miller (Husband) are citizens and residents of Horry County, South Carolina, and have been so for more than three (3) months prior to filing this action.

3. Plaintiff Wife and Defendant are husband and wife, having been married on November 7, 2017, in Horry County, State of South Carolina.

4. Of said marriage, no children have been born and no children are expected.

5. Defendant, Solid Rock Ministries, Inc., (Church) is a non-profit corporation, incorporated under the laws of the State of South Carolina, doing business in the State of South Carolina which has an office and church building located at 803 Howard Street, City of Myrtle Beach, County of Horry, State of South Carolina. (Exhibit B – *Certificate of Existence*)

6. Plaintiff is informed and believes that Defendant Church is a mere extension of himself as Defendant Husband is the Organizer and Senior Pastor of the church, doing business as and operating as Solid Rock Church at Market Common. (Exhibit C – *Articles of Incorporation*)

7. Upon information and belief, as outlined further hereinbelow, the Defendant Church holds title to marital real estate, the marital home, which belongs to the marital estate and therefore is subject to the jurisdiction of the Family Court for the purposes of equitable division.

8. Pursuant to §§20-3-30, 20-3-50, and 20-3-60 of the *Code of Laws of South Carolina*, this Court has jurisdiction over the parties and thereto and the subject matter herein and Horry County is the proper venue for this action.

FOR A FIRST CAUSE OF ACTION
(*Separate Maintenance and Support*)

9. The allegations contained in the forgoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

10. As a result of unfortunate circumstances, Wife and Defendant Husband separated on or about February 6, 2024, and have lived separate and apart since that time.

11. Plaintiff Wife states that due to irreconcilable differences they are no longer able to remain together in the capacity of husband and wife.

FOR A SECOND CAUSE OF ACTION
(Equitable Apportionment of Marital Property and Debts)

12. The allegations contained in the forgoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

13. During the course of this marriage the parties have accumulated marital assets. In addition, the parties have incurred certain debts. Plaintiff is informed and believes that some of the assets and some of the debts may not be a part of the marital estate under the definitions set out under South Carolina law.

14. Plaintiff Wife has contributed, both directly and indirectly, to the acquisition of marital property. Plaintiff is informed and believes Plaintiff is entitled to an Order of this Court determining the non-marital assets and debts, if any; and equitably apportioning the marital asset and debts in accordance with all applicable law.

15. Upon information and belief, Plaintiff is entitled to an equitable distribution of marital property pursuant to the *Equitable Apportionment of Marital Property Act* and desires that the same be granted to Plaintiff both *pendente lite* and permanently.

FOR A THIRD CAUSE OF ACTION
(Third-Party Defendant-Holding Marital Property)

16. The allegations contained in the forgoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

17. The marital home of the Wife, Mica Miller, and her Husband John-Paul Miller is located at [REDACTED] Myrtle Beach, SC [REDACTED]

wherein they resided together from the beginning of the marriage until their date of separation.

18. Pursuant to the Deed recorded with the Horry County Registrar of Deeds, the marital home was owned prior to the marriage by Defendant Miller and Kirk Hanna, having been purchased on January 14, 2016.

19. On November 17, 2020, during the marriage, Defendant Husband and Kirk Hanna transferred the property solely to Defendant Husband's name.

20. On November 18, 2020, during the marriage, Defendant Husband took out a Purchase Money Mortgage, secured by the marital home, in the amount of ONE HUNDRED NINETY-NINE THOUSAND FIVE HUNDRED (\$199,500.00) Dollars which was satisfied on December 12, 2023.

21. On July 7, 2021, during the marriage, pursuant to the Horry County Registrar of Deeds, Defendant Husband took out a mortgage against the property in the amount of TWO HUNDRED EIGHT THOUSAND FIVE HUNDRED EIGHTY-SEVEN (\$208,587.00) Dollars which was satisfied on December 22, 2023.

22. Upon information and belief, the monthly mortgage payments from these two (2) mortgages were paid from joint marital funds.

23. During the course of the marriage the Millers invested a significant amount of money, believed to be approximately \$90,000, in the upgrades and improvements to the marital home, which upon information and belief was also paid for from joint marital funds.

24. On October 9, 2023, Wife Mica Miller (decedent) filed an action for divorce from her husband John-Paul Miller, but it was dismissed at the behest of Defendant Husband on February 13, 2024.

25. Pursuant to the Deed recorded with the Horry County Registrar of Deeds, on December 15, 2023, while a divorce action was pending, Defendant, John-Paul Miller, "sold" the marital home to the Defendant Solid Rock Ministries, Inc., for ONE HUNDRED SIXTY-NINE THOUSAND THREE HUNDRED THIRTY-ONE and 31/100 (\$169,331.31), which is believed to be significantly less than the actual value of the real estate.

26. Upon information and belief, Defendant Miller's supposed sale of the marital home to Defendant Church is believed to have been his attempt to defraud and deprive his wife, Mica Miller, from her fair share of the marital asset.

27. Upon information and belief, Defendant Church is in collusion with the Defendant Husband in an attempt to deprive Wife from her fair share of the marital estate.

28. Based on the foregoing stated facts and other facts as may be determined, Plaintiff is of the belief that the "pre-marital" home was transmuted to marital property and therefore is subject to equitable division.

29. If the Family Court finds that the marital home was not transmuted, Plaintiff takes the position that a special equity interest was created, which is also subject to equitable division.

30. Plaintiff seeks an order of this Court to determine whether the property held by the Defendant Church is marital property subject to equitable division and if so, adding the value of the asset to the marital estate.

31. Plaintiff further seeks that this Court find that the Defendant Church assisted and/or conspired to deprive Wife of her fair share of the marital asset and reverse

the “sale”/transfer of the property to the Defendant Church, thereby restoring it to the marital estate.

FOR A FOURTH CAUSE OF ACTION
(Restraining Orders – Persons & Property)

32. The allegations contained in the forgoing paragraphs of Plaintiff’s Complaint are incorporated by reference herein as if fully restated.

33. Plaintiff is informed and believes Defendant should be enjoined and restrained from coming about, abusing, harming, harassing, communicating, threatening, or otherwise interfering with Plaintiff, Plaintiff’s immediate family members, and Plaintiff’s close friends in any manner whatsoever, including via electronic means, social media, and third parties. Plaintiff desires that the restraining order be granted to Plaintiff both *pendente lite* and permanently.

34. Plaintiff is informed and believes Plaintiff is entitled to an Order of this Court restraining and enjoining Defendant from sharing with any third party any photos, videos, or communication, including private and/or provocative photos, private and/or provocative videos, and/or private provocative communications, of Plaintiff vis social media, text message, or email, or any other means whether it be directly, anonymously, or indirectly by way of third party.

35. Plaintiff is informed and believes Plaintiff is entitled to an Order restraining and enjoining Defendant from disposing, encumbering, transferring, selling, hypothecating, pledging, destroying, or otherwise altering the status of value of any marital asset in any manner, pending a Final Order of this court.

36. Plaintiff is informed and believes Plaintiff is entitled to an Order restraining and enjoining Defendant from incurring any bills or obligations for services,

property, or any other matter in the name of Plaintiff and holding Defendant solely and exclusively responsible for any and all debts currently in Defendant's name and holding Plaintiff harmless on the same.

FOR A FIFTH CAUSE OF ACTION
(Name Change)

37. The allegations contained in the forgoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

38. Plaintiff Wife is seeking to restore her maiden name, Mica Acacia Francis.

39. Alternatively, Plaintiff Special Administrator requests that Wife's name be amended to drop the last name "Miller."

40. Plaintiff is informed and believes that Wife is entitled to have her maiden name, restored to her, or to have the last name Miller dropped, for she is deceased and her estate is not trying to hide from any debts, obligations, or any other legal responsibilities that may exist.

41. Accordingly, Plaintiff is seeking an Order of this Court restoring Wife's maiden name, Mica Acacia Francis, or alternatively granting a name change to Mica Acacia.

42. Plaintiff seeks to have the court issue an order to all agencies requiring that her death certificate and any other relevant documents reflect the name change.

FOR A SIXTH CAUSE OF ACTION
(Financial Accounting & Forensic Expert Fees)

43. The allegations contained in the forgoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

44. Based on the actions of the Defendant Husband in connivance with the Defendant Church in attempting to conceal and or deprive Wife of her fair share of the

marital estate, Plaintiff seeks an order requiring Defendant Husband to account for any and all marital and/or non-marital assets which Defendant has in any way depleted, liquidated, altered, transferred, or encumbered since for the past three (3) years.

45. Plaintiff further seeks the appointment of a Financial Forensic expert to conduct a financial investigation into the marital estate and requests that Defendants be required to advance the costs of the forensic expert's financial investigation to the Plaintiff.

FOR A SEVENTH CAUSE OF ACTION
(Attorney Fees and Costs Against Defendant Husband)

46. The allegations contained in the forgoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

47. As a result of Defendant Husband's actions, Plaintiff was forced to retain the services of an attorney and Plaintiff is informed and believes that but for Defendant's actions, there would be no need for Plaintiff to spend money on legal fees or costs associated with this proceeding and/or Plaintiff would not have to incur unnecessarily additional attorney fees and costs associated with this proceeding.

48. Further, upon information and belief, Defendant is in a financially superior position to Plaintiff and therefore, is better able to pay the costs and expenses associated with this action.

49. Plaintiff is, therefore, informed and believes Plaintiff is entitled to an Order of this court requiring Defendant to pay all of Plaintiff's attorney fees, costs, and other litigation expenses.

FOR AN EIGHTH CAUSE OF ACTION
(Attorney Fees/Costs Against Third-Party Defendant)

50. The allegations contained in the forgoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

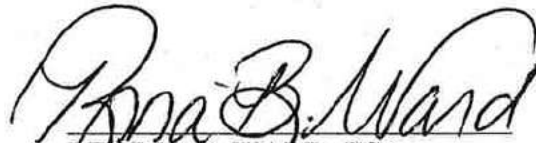
51. Plaintiff is informed and believes that Plaintiff is entitled to recover attorney fees and costs from the Defendant Church due to its bad acts in colluding with Defendant Husband to hide marital assets for the purposes of depriving Wife from her fair share of the marital estate and due to the additional attorney fees and expenses expected to be incurred as a result of such collusion.

WHEREFORE, Plaintiff prays for an Order of this Court as follows:

- a. Awarding Plaintiff a Decree of Separate Maintenance and Support;
- b. Granting Plaintiff an Order equitably apportioning the marital assets and debts in accordance with all applicable law, and granting an equitable distribution of marital property pursuant to the *Equitable Apportionment of Marital Property Act* both *pendente lite* and permanently;
- c. Determining the marital residence is marital property or alternatively that a special equity interest exists in the property and is subject to an equitable division;
- d. Granting an Order determining whether property held by the third party Defendant Church is marital and if so, reversing the transfer/sale of the property and restoring it to the marital estate or alternatively adding the value of the asset to the marital estate;

- e. Issuing the restraining orders as to persons, property, and debt as sought hereinabove, both *pendente lite* and permanently;
- f. Granting an Order changing wife's last name and requiring the death certificate and other pertinent documents to be amended to delete the last name Miller;
- g. Granting a Financial Accounting and appointment of a Forensic Expert to conduct a financial investigation into the marital estate for any fraudulent transfers of marital property including money and accounts;
- h. Requiring the Defendants to pay for the costs of a Forensic Expert and financial investigation in advance;
- i. Requiring Defendant Husband to pay for Plaintiff's attorney fees and costs of litigation;
- j. Requiring Defendant Church to pay for attorney fees and costs of litigation; and
- k. Awarding such other and further relief as this Court may deem just and proper.

WARD LAW FIRM



REGINA B. WARD, ESQ.
S.C. Bar No.: 73-718
Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, SC 29588
O: 843-488-WARD (9273)

www.AttorneyReginaWard.com

Date:

5/7/2024

STATE OF SOUTH CAROLINA)
) IN THE PROBATE COURT
)
COUNTY OF: HORRY)
)
)
IN THE ESTATE OF:)
)
MICA ACAICA MILLER, DECEASED) CASE NUMBER 2024ES2601446

CERTIFICATE OF APPOINTMENT

This is to certify that

Sierra Francis

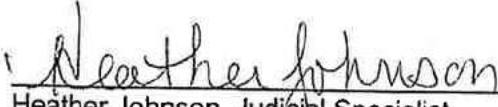
Is the duly qualified

SPECIAL ADMINISTRATOR

in the above matter and that this appointment, having been executed on the 3rd day of May, 2024, is now in full force and effect, including authorization to receive all monies, income, principal, interest & dividends of and belonging to said estate.

RESTRICTIONS: The Special Administrator is appointed for the limited purposes of appearing on behalf of Decedent's Estate in any litigation in which Decedent's estate may have an interest, including but not limited to marital litigation; obtaining medical, tax, or other confidential records of the Decedent; gaining access to and taking possession of any Wills, deeds to cemetery plots, and insurance policies, or other Estate related documents in Decedent's safe deposit box (if any); and protecting, preserving, and maintaining the estate of the Decedent until the appointment and qualification of a Personal Representative, at which time the Special Administrator shall deliver possession and control of the Decedent's property to the Personal Representative and the Special Administrator's appointment will be terminated.

Executed this 3rd day of May, 2024.


Heather Johnson, Judicial Specialist

Do not accept a copy of this
Certificate of Appointment
Without the raised seal of
The Probate Court.

The State of South Carolina



Office of Secretary of State Mark Hammond

Certificate of Existence

I, Mark Hammond, Secretary of State of South Carolina Hereby Certify that:

SOLID ROCK MINISTRIES, INC., a nonprofit corporation duly organized under the laws of the State of South Carolina on May 19th, 2006, has as of the date hereof filed as a nonprofit corporation for religious, educational, social, fraternal, charitable, or other eleemosynary purpose, and has paid all fees, taxes and penalties owed to the State, that the Secretary of State has not mailed notice to the company that it is subject to being dissolved by administrative action pursuant to S.C. Code Ann. §33-31-1421, and that the nonprofit corporation has not filed articles of dissolution as of the date hereof.

Given under my Hand and the Great Seal
of the State of South Carolina this 7th day
of May, 2024.


Mark Hammond, Secretary of State

CERTIFIED TO BE A TRUE AND CORRECT COPY
AS TAKEN FROM AND COMPARED WITH THE
ORIGINAL ON FILE IN THIS OFFICE

May 07 2024
REFERENCE ID: 1616802

**STATE OF SOUTH CAROLINA
SECRETARY OF STATE
NONPROFIT CORPORATION
ARTICLES OF INCORPORATION**

Mark Hammond
SECRETARY OF STATE OF SOUTH CAROLINA

EARLY IN BLACK INK

Pursuant to Section 33-31-202 of the South Carolina Code of Laws, as amended, the undersigned corporation submits the following information

1. The name of the nonprofit corporation is Solid Rock Ministries, Inc
2. The initial registered office of the nonprofit corporation is [REDACTED]
Myrtle Beach Horry South Carolina 29588
City County State Zip Code

The name of the registered agent of the nonprofit corporation at that office is
John-Paul Miller
Print Name

I hereby consent to the appointment as registered agent of the corporation

John-Paul Miller
Agent's Signature

3. Check "a", "b", or "c" whichever is applicable. Check only one box
- a The nonprofit corporation is a public benefit corporation
 - b The nonprofit corporation is a religious corporation
 - c The nonprofit corporation is a mutual benefit corporation
4. Check "a" or "b", whichever is applicable
- a This corporation will have members
 - b This corporation will not have members
5. The address of the principal office of the nonprofit corporation is
[REDACTED] Myrtle Beach Horry South Carolina 29588
Street Address City County State Zip Code

6. If this nonprofit corporation is either a public benefit or religious corporation (when box "a" or "b" of paragraph 3 is checked), complete either "a" or "b", whichever is applicable, to describe how the remaining assets of the corporation will be distributed upon dissolution of the corporation.
- a Upon dissolution of the corporation, assets shall be distributed for one or more exempt purposes within the meaning of section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future Federal tax code, or shall be distributed to the Federal government, or to a state or local government, for a public purpose. Any such asset not so disposed of shall be disposed of by the Court of Common Pleas of the county in which the principal office of the corporation is then located, exclusively for such purposes or to such organization or organizations, as said court shall determine, which are organized and operated

060623-0247 FILED 05/19/2006
SOLID ROCK MINISTRIES, INC

Filing Fee \$25.00 ORIG



Mark Hammond South Carolina Secretary of State

CERTIFIED TO BE A TRUE AND CORRECT COPY
AS TAKEN FROM AND COMPARED WITH THE
ORIGINAL ON FILE IN THIS OFFICE

May 07 2024
REFERENCE ID: 1616802

**STATE OF SOUTH CAROLINA
SECRETARY OF STATE
NONPROFIT CORPORATION
ARTICLES OF INCORPORATION**

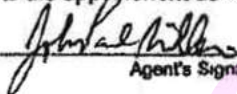

SECRETARY OF STATE OF SOUTH CAROLINA **EARLY IN BLACK INK**

Pursuant to Section 33-31-202 of the South Carolina Code of Laws, as amended, the undersigned corporation submits the following information

1. The name of the nonprofit corporation is Solid Rock Ministries, Inc
2. The initial registered office of the nonprofit corporation is _____
Myrtle Beach Horry South Carolina 29588
City County State Zip Code

The name of the registered agent of the nonprofit corporation at that office is
John-Paul Miller
Print Name

I hereby consent to the appointment as registered agent of the corporation


Agent's Signature

3. Check "a", "b", or "c" whichever is applicable. Check only one box
- a The nonprofit corporation is a public benefit corporation
- b The nonprofit corporation is a religious corporation
- c The nonprofit corporation is a mutual benefit corporation
4. Check "a" or "b", whichever is applicable
- a This corporation will have members
- b This corporation will not have members
5. The address of the principal office of the nonprofit corporation is
Myrtle Beach Horry South Carolina 29588
Street Address City County State Zip Code

6. If this nonprofit corporation is either a public benefit or religious corporation (when box "a" or "b" of paragraph 3 is checked), complete either "a" or "b", whichever is applicable, to describe how the remaining assets of the corporation will be distributed upon dissolution of the corporation.
- a Upon dissolution of the corporation, assets shall be distributed for one or more exempt purposes within the meaning of section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future Federal tax code, or shall be distributed to the Federal government, or to a state or local government, for a public purpose. Any such asset not so disposed of shall be disposed of by the Court of Common Pleas of the county in which the principal office of the corporation is then located, exclusively for such purposes or to such organization or organizations, as said court shall determine, which are organized and operated

060523-0247 FILED: 05/19/2006
SOLID ROCK MINISTRIES, INC
Filing Fee \$25.00 ORIG

Mark Hammond South Carolina Secretary of State

CERTIFIED TO BE A TRUE AND CORRECT COPY
AS TAKEN FROM AND COMPARED WITH THE
ORIGINAL ON FILE IN THIS OFFICE

Solid Rock Ministries, Inc.

Name of Corporation

May 07 2024

REFERENCE ID: 1616802

Mark Hammond
SECRETARY OF STATE OF SOUTH CAROLINA

exclusively for such purposes

Upon dissolution of the corporation, consistent with the law, the remaining assets of the corporation shall be distributed to

7 If the corporation is a mutual benefit corporation (when box "c" of paragraph 3 is checked), complete either "a" or "b", whichever is applicable, to describe how the (remaining) assets of the corporation will be distributed upon dissolution of the corporation

a Upon dissolution of the mutual benefit corporation, the (remaining) assets shall be distributed to its members, or if it has no members, to those persons to whom the corporation holds itself out as benefiting or serving

b Upon dissolution of the mutual benefit corporation, the (remaining) assets, consistent with the law, shall be distributed to

8 The optional provisions which the nonprofit corporation elects to include in the articles of incorporation are as follows (See 33-31-202(c) of the 1976 South Carolina Code of Laws, as amended, the applicable comments thereto, and the instructions to this form)

9 The name and address of each incorporator is as follows (only one is required)

Name	Address	Zip Code
John-Paul Miller	[REDACTED]	Myrtle Beach, SC 29588
Name	Address	Zip Code
Name	Address	Zip Code

10 Each original director of the nonprofit corporation must sign the articles but only if the directors are named in these articles

Name (Only if named in articles)	Signature of director
Name (Only if named in articles)	Signature of director
Name (Only if named in articles)	Signature of director

11 Each incorporator must sign the articles

John-Paul Miller
Signature of incorporator

Signature of incorporator

Signature of incorporator

STATE OF SOUTH CAROLINA)
 COUNTY OF HORRY)
 SIERRA FRANCIS, AS THE)
 SPECIAL ADMINISTRATOR FOR)
 THE ESTATE OF MICA ACAICA)
 MILLER,)
 Plaintiff)
 v.)
 JOHN-PAUL MILLER,)
 Defendant.)

IN THE FAMILY COURT OF THE
 FIFTEENTH JUDICIAL CIRCUIT

SUPPLEMENTAL COMPLAINT
 (Substitute Special Administrator as Plaintiff)

FILE NO.: 2024-DR-26-00860

Plaintiff, complaining of Defendant herein, would respectfully show unto this
 Honorable Court as follows:

FOR A CAUSE OF ACTION
 (Substitution of Party)

1. The allegations contained in the paragraphs of Plaintiff's Complaint filed on April 16, 2024, are incorporated by reference herein as if fully restated.
2. On April 16, 2024, Plaintiff Mica Acaica Miller (not deceased), filed this matter for Separate Support and Maintenance and on April 25, 2024, Defendant John-Paul Miller was personally served with the Summons and Complaint.
3. On April 27, 2024, Plaintiff Mica Acaica Miller (Decedent) passed away and on May 3, 2024, the Horry County Probate Court issued a Certificate of Appointment naming Sierra Francis, as the Special Administrator for the limited purposes of appearing on behalf of Decedent's Estate in any litigation in which Decedent's estate may have an interest, including but not limited to marital litigation.


SSCANED

4. Granting the substitution of the Special Administrator as the Plaintiff on behalf of the Estate of Mica Acaica Miller.

WHEREFORE, Plaintiff prays for an Order of this Court as follows:

- a. Awarding Plaintiff all relief requested in the Complaint filed on April 16, 2024;
and
- b. Substituting the Special Administrator as Plaintiff on behalf of the Decedent's Estate to pursue all matters that have not been abated by Decedent's death.
- c. Awarding such other and further relief as this Court may deem just and proper.

WARD LAW FIRM


REGINA B. WARD, ESQ.
S.C. Bar No.: 73-718
Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, SC 29588
O: 843-488-WARD (9273)

www.AttorneyReginaWard.com

Date: 5/6/2024

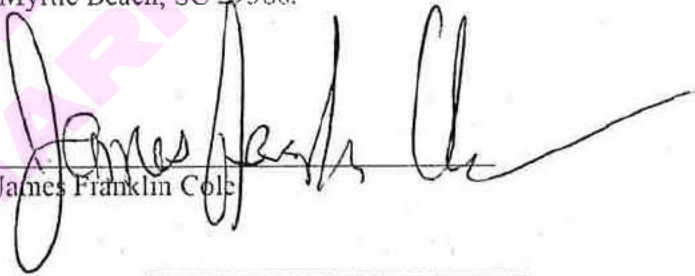
STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)
)
MICA A. MILLER,)
)
) Plaintiff,)
)
) v.)
)
JOHN-PAUL MILLER,)
)
) Defendant.)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT


AFFIDAVIT OF SERVICE

FILE NO.: 2024-DR-26-00860

PERSONALLY APPEARED before me, the undersigned James Franklin Cole., who deposes and states that he is over the age of eighteen (18) and not a party to this action, and hereby certifies that on the 25th day of April, 2024, at 5:38 p.m., he served John-Paull Miller personally a clocked copy of the Family Court Coversheet, Summons, Complaint, Verification, Notice of Motion for Temporary Relief, Notice of Temporary Hearing scheduled for June 5, 2024, at 2:30 p.m., an enclosure letter, and a copy of an Electronically Stored Information preservation letter at his residence located at 246 Coldwater Circle, Myrtle Beach, SC 29588.


James Franklin Cole

SWORN to and subscribed before me
This 2nd day of May 2024.


Notary Public for State of Virginia
My Commission Expires: 12-31-2026

MICHAEL DAVID CREWS
NOTARY PUBLIC
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES DEC. 31, 2026
COMMISSION # 7794878

FILED
HORRY COUNTY
2024 MAY - 3 A 11: 19
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

SCANNED

NOTICE OF HEARING
(to be completed by scheduling clerk only)

A HEARING HAS BEEN SET IN THIS MATTER ON THE 5th DAY OF JUNE, 2024 AT 2:30pm BEFORE
THE HONORABLE Jan Bromell Holmes IN FAMILY COURTROOM NUMBER TBD

Krystle Housand, Scheduling Clerk

MOTION OR RULE REQUEST
(to be completed by moving party)

CAPTION: Mica A. Miller v. John-Paul Miller
CASE NUMBER: 2024-DR-0860 DATE MOTION FILED: 04/16/2024
MOVING ATTORNEY: Regina B. Ward, Esq. REPRESENTS: Plaintiff
TELEPHONE: 843-488-9273 FAX: [Click here to enter text.](#)
GUARDIAN AD LITEM: None
NATURE OF MOTION: Motion for Temporary Relief IF OTHER:
ESTIMATED TIME NEEDED: 15 minutes

DATES AVAILABLE:

May: 13, 15, 21-22
June: 4-6, 13, 17, 18, 20, 24-27
July: 11, 15-18, 25, 29-31
August: 1, 5-8, 12-15, 19-22, 26-27, 29
September: 3-5, 9-12, 16-17, 19, 23-26, 30
October: 1-3, 7-10, 15-17, 21-24, 28-30
November: 4-7, 12-14, 18-21

FILED
HORRY COUNTY
2024 APR 23 P 12:37

LUNA SHARKY OF ME

CERTIFICATION REGARDING GUARDIAN *AD LITEM*

I certify that I have obtained available dates from the Guardian *ad Litem* prior to submitting this hearing request or that there is no Guardian *ad Litem* appointed in the case at this time.

Michaela Wilson

Print name

Date: 04/17/24

This form must be submitted with all hearing requests or a hearing will not be scheduled.

COURTESY OF
LUNA SHARK MEDIA

Housand, Krystle

From: Michaela Wilson <Michaela@wlf.legal>
Sent: Monday, April 22, 2024 12:30 PM
To: Housand, Krystle
Subject: Re: Miller v. Miller-Motion Request
Attachments: Notice of Hearing.docx; Motion for Temp Relief-CLOCKED.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Krystle,

My apologies for the draft watermark. Please see attached clean version for the Miller v. Miller hearing request. I'm sorry about that! Please let me know if there is anything else needed.

Thank you!

Sincerely,

Michaela W. Wilson
Law Clerk to Regina B. Ward, Esq.

Ward Law Firm
LAW FIRM OF REGINA B WARD, LLC
Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, SC 29588

Office: 843-488-9273

Web: www.AttorneyReginaWard.com

CONFIDENTIALITY NOTICE: This e-mail message and all attachments is being sent by or on behalf of a lawyer and may constitute information that is legally privileged or confidential, or otherwise legally exempt from disclosure and is intended solely for the use of the intended addressee. If you are not the intended recipient or an employee or agent responsible for delivering this message to the named recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. Further, you are not authorized to retain, read, copy or disseminate all or any part of this e-mail message. If you have received this message in error, please notify the sender immediately by electronic mail or by telephone at (843) 488-9273 and delete this message and any copies or backups. Also, delete this message from your computer files. Thank you for your assistance.

From: Housand, Krystle <Housand.Krystle@horrycountysc.gov>
Sent: Monday, April 22, 2024 12:13 PM
To: Michaela Wilson <Michaela@wlf.legal>
Subject: RE: Miller v. Miller-Motion Request

Michaela,

The attachment that was submitted had draft on it.

Krystle D. Housand, Administrative Assistant
Horry County Government
Family Court Scheduling Clerk
1301 Second Avenue,
Conway, South Carolina, 29526
Tel: (843) 915-8981 Fax: (843) 915-8972
Housand.Krystle@horrycountysc.gov

From: Michaela Wilson <Michaela@wlf.legal>
Sent: Wednesday, April 17, 2024 12:11 PM
To: Housand, Krystle <Housand.Krystle@horrycountysc.gov>
Subject: Miller v. Miller-Motion Request

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Krystle,

Please see attached clocked Motion for Temporary Relief and hearing request for Miller v. Miller 2024-26-0860.

Let me know if you need anything else from us. Thank you!

Sincerely,

Michaela W. Wilson
Law Clerk to Regina B. Ward, Esq.

Ward Law Firm

LAW FIRM OF REGINA B. WARD LLC

Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, SC 29588

Office: 843-488-9273

Web: www.AttorneyReginaWard.com

CONFIDENTIALITY NOTICE: This e-mail message and all attachments is being sent by or on behalf of a lawyer and may constitute information that is legally privileged or confidential, or otherwise legally exempt from disclosure and is intended solely for the use of the intended addressee. If you are not the intended recipient or an employee or agent responsible for delivering this message to the named recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. Further, you are not authorized to retain, read, copy or disseminate all or any part of this e-mail message. If you have received this message in error, please notify the sender immediately by electronic mail or by telephone at (843) 488-9273 and delete this message and any copies or backups. Also, delete this message from your computer files. Thank you for your assistance.

All e-mail correspondence to and from this address may be subject to public disclosure under the South Carolina Freedom of Information Act (FOIA). This correspondence is intended exclusively for the individual or entity to which it is addressed and may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure.

**COURTESY OF
LUNA SHARK MEDIA**

STATE OF SOUTH CAROLINA)
)
 COUNTY OF HORRY)
)
MICA A. MILLER,)
 Plaintiff,)
 v.)
)
JOHN-PAUL MILLER,)
 Defendant.)

IN THE FAMILY COURT
 FIFTEENTH JUDICIAL CIRCUIT

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

File No.: 2024-DR-26-0860

Plaintiff's Attorney: <u>Regina B. Ward, Esq., Bar No. 73-718</u> Address <u>Law Firm of Regina B. Ward, LLC.</u> <u>9007 Highway 544</u> <u>Myrtle Beach, SC 29588</u> Phone: <u>843-488-9273</u> Fax: <u>843-488-9272</u> Email: <u>RBW@WLF.Legal</u> Other: <u>Jess@WLF.Legal</u>	Defendant: Address: Phone: _____ Fax: _____ Email: _____ Other: _____
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information	
Nature of Motion: <u>Temporary Hearing</u> Estimated Time Needed: <u>15 minutes</u> Court Reporter Needed: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
SECTION II: Motion/Order Type	
<input type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
Signature of Attorney for <input type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant	Date Submitted
SECTION III: Motion Fee	
<input checked="" type="checkbox"/> PAID – AMOUNT: \$25.00 <input type="checkbox"/> EXEMPT: (check reason)	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	
JUDGE'S SECTION	JUDGE CODE _____ Date _____
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	Judge Signature _____
CLERK'S VERIFICATION	
Collected by: <u>[Signature]</u> Date Filed: <u>4/10/2024</u> <input checked="" type="checkbox"/> MOTION FEE COLLECTED: \$ 25.00 <input type="checkbox"/> CONTESTED – AMOUNT DUE: \$ _____	

SCANNED

STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)
)
MICA A. MILLER,)
)
Plaintiff,)
)
v.)
)
JOHN-PAUL MILLER,)
)
Defendant.)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

NOTICE OF MOTION
AND
MOTION FOR
TEMPORARY RELIEF

FILE NO.: 2024-DR-26-860

FILED
HORRY COUNTY

TO THE ABOVE-NAMED DEFENDANT, JOHN-PAUL MILLER:

YOU WILL PLEASE TAKE NOTICE that Plaintiff, through her attorney, Regina B. Ward, Esq., will move before the presiding Judge of the Family Court at the Horry County Courthouse, Conway, South Carolina on the fifth (5th) day after service hereof; or as soon thereafter as counsel might be heard, for a Temporary Order granting the herein requested relief.

Based upon the pleadings which have been filed in this matter, Plaintiff hereby moves before this Honorable Court for a hearing *pendente lite* to determine the following issues:

- a) Marital Home: Granting Defendant continued use and possession of the marital home and the furnishings and contents; and requiring Defendant to be solely responsible to make timely payments as to the mortgage, utilities, insurance, tax and other expenses associated with maintaining the household.
- b) Spousal Support: Requiring Defendant to pay spousal support through the *South Carolina State Disbursement Unit* of a type and in an amount to be determined as appropriate and equitable by the Court, both *pendente lite* and permanently.

c) Vehicles: Granting each party use and possession of their respective vehicles and requiring each to pay for all liens, taxes, maintenance, and insurance for vehicles.

d) Personal Property: Granting Plaintiff possession of her Plunge Ice Bath, Apple AirPods, Apple TV, iPhone, Laptop, Apple Watch, and her firearms.

e) Restraining Orders: Granting the restraining orders as to person, property, and debt for the protection of the Plaintiff as requested in the Complaint and set forth below:

1. Persons: Restraining Defendant from coming about, abusing, harming, harassing, communicating, threatening, or otherwise interfering with Plaintiff, Plaintiff's immediate family members, and Plaintiff's close friends in any manner whatsoever, including via electronic means, social media, and third parties;
2. Restraining Order-Dissemination: Restraining Defendant from sharing any photos, videos, or communication, including private and/or provocative photos, private and/or provocative videos, and/or private and provocative communication, of the Plaintiff with any third party via social media, text message, or email, or any other means whether it be directly, anonymously, or indirectly by way of third party;
3. Property: Restraining and enjoining Defendant from disposing, encumbering, transferring, selling, hypothecating, pledging, destroying, or otherwise altering the status or value of any marital asset in any manner, pending a Final Order of this Court; further requiring Defendant

to account for any and all marital and/or non-marital assets which Defendant has in any way depleted, liquidated, altered, transferred, or encumbered since the parties separated on February 6, 2024, or in anticipation thereof; and

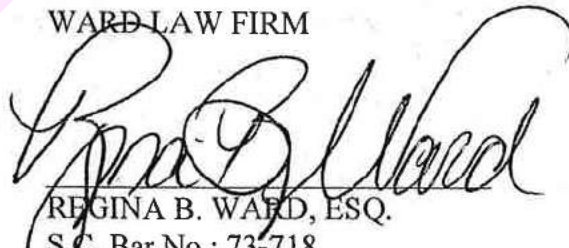
4. Restraining Order-Debts: Restraining Defendant from incurring any bills or obligations for services, property, or any other matter in the name of Plaintiff and holding Defendant solely and exclusively responsible for any and all debts currently in Defendant's name and hold Plaintiff harmless on same.

f) Attorney's Fees/Costs: Requiring Defendant to pay all of Plaintiff attorney's fees, suit monies and court costs incurred by the Plaintiff; and

g) Equitable Relief: For such other and further relief as this Court may deem just and proper.

I SO MOVE.

WARD LAW FIRM



REGINA B. WARD, ESQ.
S.C. Bar No.: 73-718
Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, South Carolina 29588
O: 843-488-WARD (9273)
F: 843-488-9272
www.AttorneyReginaWard.com

Date:

4/15/2024

Miller v. Miller
2024-DR-26-860

Motion for Temporary Relief
3 of 3

STATE OF SOUTH CAROLINA)
)
 COUNTY OF HORRY)
)
 MICA A. MILLER,)
)
 Plaintiff,)
)
 v.)
)
 JOHN-PAUL MILLER,)
)
 Defendant.)

IN THE FAMILY COURT OF THE
 FIFTEENTH JUDICIAL CIRCUIT

FAMILY COURT COVERSHEET

FILE NO.: 2024-DR-26-0860

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for docketing purposes for the Clerk of Court and must be signed and dated, and filled out completely. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

Submitted by: Regina B. Ward, Esq.
 Address: Law Firm of Regina B. Ward, LLC
9007 Hwy 544 Myrtle Beach, SC 29588
 Email: RBW@wlf.legal

SC Bar # 73-718
 Telephone # 843-488-9273
 Fax # 843-488-9272
 Other: Michaela@wlf.legal

DOCKETING INFORMATION

- This case is subject to MEDIATION pursuant to the Family Court Alternative Dispute Resolution Rules.
- This case is exempt from ADR (certificate attached).

**Nature of Action Codes
 (Check One)**

Marital Dissolution

- Divorce (110)
- Annulment (120)
- Separate Support and Maintenance (130)
- Registration of Foreign Divorce Decree – without support/custody (190)
- Registration of Foreign Divorce Decree – with support/custody (191)
- Marital Dissolution – Other (199) _____

Abuse and Neglect

- Abuse and Neglect – Child (210)
- Abuse and Neglect – Adult (220)
- Abuse and Neglect – Other (299) _____

Juvenile Delinquency

- Truancy (311)
- Incurable (312)
- Runaway (313)
- Criminal Offense – Drug (315)
- Criminal Offense – Against a Person (316)
- Criminal Offense – Property (317)
- Criminal Offense – Public Order (318)
- Criminal Offense – Other (320)
- Juvenile Delinquency – Other (399) _____

Protection from Domestic Abuse

- Domestic Abuse – Intimate Partner (410)
- Domestic Abuse – Minor (420)
- Registration of Foreign Order of Protection (490)
- Domestic Abuse – Other (499) _____

Support

- Child Support – Private (501)
- Child Support – Administrative Process (502)
- Child Support – Judicial Process (503)
- Registration of Foreign Order of Support (504)
- UIFSA – Outgoing (505)
- UIFSA – Incoming (506)
- Modification of Child Support – Private (507)
- Modification of Child Support – DSS (508)
- Modification of Alimony (525)
- College Expenses (530)
- Support – Other (599) _____

Custody/Visitation

- Child Custody/Visitation (610)
- Modification of Custody/Visitation (615)
- Temporary Custody – Nonparent (616)
- Registration of Foreign Child Custody Order (690)
- Visitation Involvement Parenting (VIP) (DSS only) (691)
- Custody/Visitation – Other (699) _____

Miscellaneous Actions

- Name Change (710)
- Correction/Birth Record (720)
- Judicial Bypass (730)
- Adoption (740)
- Foreign Adoption (741)
- Post Dissolution Equitable Distribution (750)
- Paternity – Private (761)
- Paternity – DSS (762)
- Termination of Parental Rights – Private (771)
- Termination of Parental Rights – DSS (772)
- Miscellaneous Actions – Others (799) _____

Submitting Party Signature: Regina B. Ward Date: 4/15/2024

Custodial Parent (if applicable): _____

Note: Frivolous civil proceedings are subject to sanctions pursuant to Rule 11, SCRPC, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §§ 15-36-10 et seq.

SCCA 467 (3/2019)

SCANNED

4/16/2024

Effective January 1, 2016, family court actions in all counties are subject to mediation. Under the provisions of the Supreme Court's Rules for Alternative Dispute Resolution (ADR), mediation is defined as an informal process in which a third-party mediator facilitates settlement discussions between parties. Any settlement is voluntary. In the absence of settlement, the parties lose none of their rights to trial.

Also under the ADR Rules, the parties may agree on a mediator or the Clerk of Court will appoint a mediator from the certified list. If the Clerk appoints a mediator from the list, the mediator will be certified by the Board of Arbitrator and Mediator Certification and may be either a lawyer, a licensed mental health professional or any other individual meeting the certification requirements.

Whether or not the mediator is a lawyer, if appointed by the court, the charge per hour is set at a specified amount under the provisions of ADR Rule 9. Parties are responsible for payment of the mediator as set out in ADR Rule 9.

SUPREME COURT RULES REQUIRE MEDIATION OF ALL CONTESTED DOMESTIC RELATIONS ACTIONS. IF THE DOCKETING INFORMATION ON PAGE 1 OF THIS COVERSHEET INDICATES THAT THIS CASE IS SUBJECT TO **MEDIATION** YOU ARE NOTIFIED THAT MEDIATED SETTLEMENT CONFERENCES ARE REQUIRED IN THIS CASE, AND THAT THE COURT-ANNEXED ADR RULES SHALL APPLY TO ALL CASES IN WHICH MEDIATION IS REQUIRED. FOR ADDITIONAL INFORMATION CONCERNING THE PROCESS AND TIME FRAMES, PLEASE CONSULT THE ADR RULES. KEY SECTIONS OF THE RULES ARE IDENTIFIED BELOW.

CONTESTED ACTIONS INVOLVING CUSTODY AND VISITATION

Rule 3	Actions Subject to ADR
Rule 4(d)(1)(3)(4) &(5)	Appointment of Mediator by Family Court
Rule 5(g)	Scheduling in Family Court
Rule 6(g)	Agreement in Family Court
Rule 7(f)	Reporting Results of Conference
Rule 9	Compensation of Neutral

ALL OTHER CONTESTED ACTIONS

Rule 3	Actions Subject to ADR
Rule 4(d)(2)(3)(4) &(5)	Appointment of Mediator by Family Court
Rule 5(g)	Scheduling in Family Court
Rule 6(g)	Agreement in Family Court
Rule 7(f)	Reporting Results of Conference
Rule 9	Compensation of Neutral

Indigent Cases: Where a mediator has been appointed, a party may move before the Chief Judge for Administrative Purposes to be exempted from payment of neutral fees and expenses based upon indigency. Applications for indigency shall be filed no later than ten (10) days after the ADR conference has been concluded. Determination of indigency shall be in the sole discretion of the Chief Judge for Administrative Purposes.

Please Note: Attendance at mediated settlement conferences is mandatory. You must comply with the Supreme Court rules regarding court-ordered mediation. Failure to do so may affect your case and may result in sanctions.

Note: Frivolous civil proceedings are subject to sanctions pursuant to Rule 11, SCRPC, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §§ 15-36-10 et seq.

STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)
)
MICA A. MILLER,)
)
)
Plaintiff,)
)
v.)
)
JOHN-PAUL MILLER,)
)
Defendant.)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

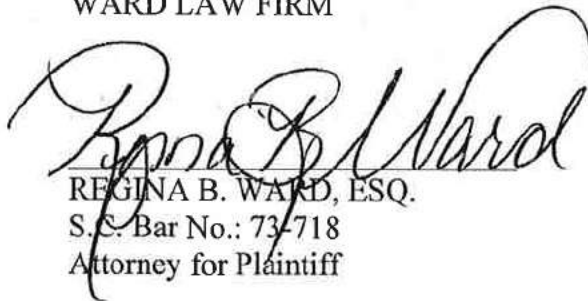
SUMMONS

FILE NO.: 2024-DR-26-860

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to Answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber, or subscribers, at her office at 9007 Hwy 544, Myrtle Beach, South Carolina 29588, within thirty (30) days after the service hereof, exclusive of the day 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.

WARD LAW FIRM


REGINA B. WARD, ESQ.
S.C. Bar No.: 73-718
Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC
9007 Hwy 544
Myrtle Beach, South Carolina 29588
O: 843-488-WARD (9273)
F: 843-488-9272
www.AttorneyReginaWard.com

Date: 4/15/2024

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

MICA A. MILLER,

Plaintiff

v.

JOHN-PAUL MILLER,

Defendant.

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

COMPLAINT

(Separate Maintenance & Support)

FILE NO.: 2024-DR-26-

860

Plaintiff, complaining of Defendant herein, would respectfully show unto this Honorable Court as follows:

JURISDICTION / VENUE

1. Plaintiff and Defendant are citizens and residents of Horry County, South Carolina, and have been so for more than three (3) months prior to filing this action.
2. Plaintiff and Defendant are husband and wife, having been married on November 7, 2017, in Horry County, State of South Carolina.
3. Of said marriage, no children have been born and no children are expected.
4. Pursuant to §§20-3-30 and 20-3-60 of the *Code of Laws of South Carolina*, this Court has jurisdiction over the parties hereto and the subject matter herein and Horry County is the proper venue for this action.

FOR A FIRST CAUSE OF ACTION

(Separate Maintenance and Support)

5. The allegations contained in the foregoing paragraphs of Plaintiff's Complaint are incorporated by reference herein as if fully restated.

6. As a result of unfortunate circumstances, Plaintiff and Defendant separated on or about February 6, 2024, and have lived separate and apart since that time.

7. Plaintiff states that due to irreconcilable differences that they are no longer able to remain together in the capacity of husband and wife.

8. Plaintiff is informed and believes Plaintiff is entitled to an order of this Court awarding Plaintiff a Decree of Separate Maintenance and Support allowing the parties to live separate and apart and seeks an Order granting such relief.

FOR A SECOND CAUSE OF ACTION
(Spousal Support)

9. The allegations contained in the foregoing paragraphs of Plaintiff's complaint are incorporated by reference herein as if fully restated.

10. Plaintiff states during the seven (7) year marriage, she has been a dutiful wife and faithfully devoted to Defendant, to their church, and to this marriage. She supported Defendant in his career and concentrated her efforts on her husband and the church.

11. Plaintiff states further that during the parties' seven (7) year marriage, she made extensive, vital contributions of an indirect and direct nature to Defendant's successful career, to the parties' welfare and income, and to the acquisition, maintenance, and preservation of property.

12. Plaintiff is informed and believes Defendant is a healthy, able-bodied person, who is self-employed operating a profitable business and is earning a substantial income and is capable of contributing to the support of Plaintiff.

13. During the entirety of this marriage, Plaintiff has been primarily dependent upon Defendant for financial support and Defendant's contribution is necessary for Plaintiff to make ends meet.

14. Plaintiff has been an employee of Defendant's business for the majority of their marriage.

15. Plaintiff is unable to meet Plaintiff's current and ongoing financial needs and therefore asks this Court to Order Defendant to pay Plaintiff for separate maintenance and support.

16. Given the disparity in the incomes of the parties, Defendant's fault in the breakdown of the marriage, the lifestyle of the parties, and all other relevant statutory and common law factors, Plaintiff is informed and believes Plaintiff is entitled to and requests, an Order of this Court requiring Defendant to pay alimony to her through the South Carolina State Disbursement Unit, of a type and in an amount to be determined as appropriate and equitable by the Court, both *pendente lite* and permanently.

17. Further, Plaintiff requests an Order of this Court permanently barring Defendant from any type of alimony, and desires that the same be granted to Plaintiff, both *pendente lite* and permanently.

FOR A THIRD CAUSE OF ACTION

(Equitable Apportionment of Marital Property and Debts)

18. The allegations contained in the foregoing paragraphs of Plaintiff's complaint are incorporated by reference herein as if fully restated.

19. During the course of this marriage the parties have accumulated marital assets. In addition, the parties have incurred certain debts. Plaintiff is informed and

believes that some of the assets and some of the debts may not constitute marital property under the definitions set out under South Carolina law.

20. Plaintiff has contributed, both directly and indirectly, to the acquisition of marital property. Plaintiff is informed and believes Plaintiff is entitled to an Order of this Court determining the non-marital assets and debts, if any; and equitably apportioning the marital assets and debts in accordance with all applicable law. Upon information and belief, Plaintiff is entitled to an equitable distribution of marital property pursuant to the *Equitable Apportionment of Marital Property Act* and desires that the same be granted to Plaintiff both *pendente lite* and permanently.

FOR A FOURTH CAUSE OF ACTION
(Restraining Orders-Persons and Property)

21. The allegations contained in the foregoing paragraphs of Plaintiff's complaint are incorporated by reference herein as if fully restated.

22. Plaintiff is informed and believes Defendant should be enjoined and restrained from coming about, abusing, harming, harassing, communicating, threatening, or otherwise interfering with Plaintiff, Plaintiff's immediate family members, and Plaintiff's close friends in any manner whatsoever, including via electronic means, social media, and third parties. Plaintiff desires that the restraining order be granted to Plaintiff both *pendente lite* and permanently.

23. Plaintiff is informed and believes Plaintiff is entitled to an Order of this Court restraining and enjoining Defendant from sharing any photos, videos, or communication, including private and/or provocative photos, private and/or provocative videos, and/or private and provocative communication, of Plaintiff with any third party

via social media, text message, or email, or any other means whether it be directly, anonymously, or indirectly by way of third party.

24. Plaintiff is informed and believes Plaintiff is entitled to an Order restraining and enjoining Defendant from disposing, encumbering, transferring, selling, hypothecating, pledging, destroying, or otherwise altering the status or value of any marital asset in any manner, pending a Final Order of this Court. Further requiring Defendant to account for any and all marital and/or non-marital assets which Defendant has in any way depleted, liquidated, altered, transferred, or encumbered since the parties separated on February 6, 2024, or in anticipation thereof.

25. Plaintiff is informed and believes Plaintiff is entitled to an Order restraining and enjoining Defendant from incurring any bills or obligations for services, property, or any other matter in the name of Plaintiff and holding Defendant solely and exclusively responsible for any and all debts currently in Defendant's name and hold Plaintiff harmless on same.

FOR A FIFTH CAUSE OF ACTION
(Attorney Fees and Costs)

26. The allegations contained in the foregoing paragraphs of Plaintiff's complaint are incorporated by reference herein as if fully restated.

27. As a result of Defendant's actions, Plaintiff was forced to retain the services of an attorney and Plaintiff is informed and believes that but for Defendant's actions, there would be no need for Plaintiff to spend money on legal fees or costs associated with this proceeding.

28. Further, upon information and belief, Defendant is in a financially superior position to Plaintiff and therefore, is better able to pay the costs and expenses associated with this action.

29. Plaintiff is, therefore, informed and believes Plaintiff is entitled to an Order of this Court requiring Defendant to pay all of Plaintiff's attorney fees, costs, and other expenses, *pendente lite*.

WHEREFORE, Plaintiff prays for an Order of this Court as follows:

- a. Awarding Plaintiff a Decree of Separate Maintenance and Support;
- b. Granting Plaintiff an Order requiring Defendant to pay alimony through the State Disbursement Unit, of a type and in an amount to be determined as appropriate and equitable by the Court, both *pendente lite* and permanently;
- c. Granting Plaintiff an Order barring Defendant from receiving any type of alimony both *pendente lite* and permanently;
- d. Granting Plaintiff an Order of this Court determining the non-marital assets and debts, if any; equitably apportioning the marital assets and debts in accordance with all applicable law, and granting an equitable distribution of marital property pursuant to the *Equitable Apportionment of Marital Property Act* both *pendente lite* and permanently;
- e. Issuing the restraining orders as to persons, property, and debt as sought hereinabove, both *pendente lite* and permanently;
- f. Requiring Defendant to pay for Plaintiff's attorney fees and costs of litigation;
and
- g. Awarding such other and further relief as this Court may deem just and proper.

WARD LAW FIRM



REGINA B. WARD, ESQ.
S.C. Bar No.: 73-718
Attorney for Plaintiff

Law Firm of Regina B. Ward, LLC
1017 Fourth Avenue
Conway, South Carolina 29526
O: 843-488-WARD (9273)
F: 843-488-9272
www.AttorneyReginaWard.com

Date: 4/15/2024

COURTESY
LUNA SHARK MEDIA

STATE OF SOUTH CAROLINA)

IN THE FAMILY COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT

COUNTY OF HORRY)

MICA A. MILLER,)

Plaintiff,)

VERIFICATION

v.)

JOHN-PAUL MILLER,)

FILE NO.: 2024-DR-26-0860

Defendant.)

PERSONALLY appeared before me, Mica A. Miller, who after first being duly sworn, states that she has read the foregoing Complaint and Motion for Temporary Relief and that the allegations contained therein are true of her own knowledge, except as to those matters stated upon information and belief, and as to those, she believes them to be true.

Mica Miller

MICA A. MILLER

SWORN to and subscribed before me
this 10th day of April 2024.

Jessica Rodriguez
Notary Public for South Carolina

My Commission Expires: 2/13/2029



FILED
2024 APR 11 10 42
Horry County