

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

FILED
HORRY COUNTY
2024 MAY - 7 P 4:45

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.
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Attorney for Plaintiff

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Date:

5/7/2024

COURTESY MEDIA
LUNA SHARK MEDIA