

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

JOHN-PAUL MILLER,

PLAINTIFF,

V.

MICA ACACIA MILLER,

DEFENDANT.

IN THE FAMILY COURT FOR THE
15TH JUDICIAL CIRCUIT

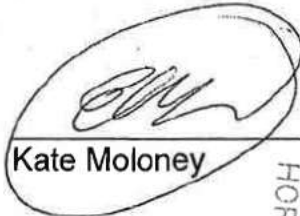
CASE NO. 2024-DR-26-0419

AFFIDAVIT OF SERVICE

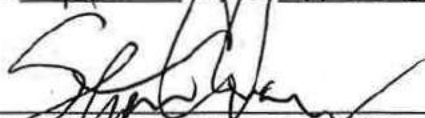
PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being
duly sworn says that (s)he served a copy of the following documents:

1. NOTICE OF MOTION HEARING (MARCH 26, 2024 AT 3:15 PM)
2. FAMILY COURT COVERSHEET
3. SUMMONS
4. COMPLAINT
5. VERIFICATION
6. MOTION AND ORDER INFORMATION FORM AND COVERSHEET
7. NOTICE OF MOTION AND MOTION FOR TEMPORARY RELIEF

on **MICA ACACIA MILLER** by delivery to HER personally at her place located at, [REDACTED]
[REDACTED] MYRTLE BEACH, SOUTH CAROLINA 29577, AT 8:20 AM ON
FEBRUARY 28, 2024, and that deponent is not a party of this action, is OVER eighteen
(18) years of age and has no interest therein or connection therewith.


Kate Moloney

Sworn to and Subscribed before me
this 14 day of March 2024


Notary Public for the State of South Carolina
My Commission Expires: 7/1/2025

FILED
HORRY COUNTY
2024 MAR 15 A 9:48
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

JOHN-PAUL MILLER,

PLAINTIFF,

v.

MICA ACACIA MILLER,

DEFENDANT.

IN THE FAMILY COURT
OF THE
15TH JUDICIAL CIRCUIT

CASE NO.: 2024-DR-26-419

CERTIFICATE OF SERVICE

I, Diana L. Palumbo, Paralegal at Indigo Family Law, certify that, on the 13th day of March 2024, I served via First-Class Mail, postage prepaid, the following documents to Defendant, Mica Miller, as set forth below:

Document(s) Served:

- Stipulation of Dismissal Without Prejudice, filed February 23, 2024; and
- Certificate of Service.

Served Upon:

Mica Miller

[REDACTED]
Myrtle Beach, SC 29577

FILED
HORRY COUNTY
2024 MAR 14 A 9:20
GENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Diana L. Palumbo

Diana L. Palumbo, Paralegal
Indigo Family Law, LLC
2055 Glens Bay Road
Surfside Beach, SC 29575
843-215-6100 phone
843-215-6105 facsimile

Sworn to and Subscribed before me
this 13th day of March 2024

Cynthia Lemon
Notary Public for South Carolina
My Commission Expires: 11/8/2026

SG [Signature]

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

JOHN-PAUL MILLER,

PLAINTIFF,

V.

MICA ACACIA MILLER,

DEFENDANT.

IN THE FAMILY COURT
OF THE
FIFTEENTH JUDICIAL CIRCUIT

CASE NO.: 2024-DR-26-0419

STIPULATION OF DISMISSAL
WITHOUT PREJUDICE

WHEREAS, Plaintiff, John-Paul Miller, has hereby requested that this case be dismissed pursuant to Rule 41 (a), without prejudice as to all claims filed or which could have been filed or arising out of the subject matter of the case above captioned.

WHEREAS, Defendant, Mica Acacia Miller, has neither filed an Answer to the Complaint nor has a Notice of Appearance been filed by an attorney on her behalf.

NOW, THEREFORE, and pursuant to Rule 41(a) SCRP, Plaintiff hereby dismisses and ends, without prejudice, all claims of which could have been filed against each other in the above-captioned matter.

I MOVE, STIPULATE, AND CONSENT:



Brana J. Williams
Attorney for Plaintiff

Dated: March 11, 2024

FILED
HORRY COUNTY
2024 MAR 12 P 12:22
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

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

A HEARING HAS BEEN SET IN THIS MATTER ON THE 26th DAY OF MARCH, 2024, AT 3:15 pm
BEFORE THE HONORABLE Melissa Frazier IN FAMILY COURTROOM NUMBER TBD

Krystle Housand, Scheduling Clerk

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

CAPTION: John-Paul Miller v. Mica Acacia Miller
CASE NUMBER: 2024-DR-26-0419 DATE MOTION FILED: 2-23-24
MOVING ATTORNEY: Brana J. Williams REPRESENTS: Plaintiff
TELEPHONE: (843) 215-6100 FAX: (843) 215-6105
GUARDIAN AD LITEM: None
NATURE OF MOTION: Motion for Temporary Relief IF OTHER:
ESTIMATED TIME NEEDED: 15 minutes

DATES AVAILABLE: March: 14; 18-20; 26-27
April: 1-5; 8; 10-11; 12 AM; 15; 17; 19; 22; 24-26; 29
May: 1-3; 6-8; 10; 13-15; 17; 20-21; 23-24; 29-31
June: 3; 5-7; 12; 14; 17; 19-21; 4-28

RENEE H. EDWARDS
CLERK OF COURT
2024 FEB 26 P 2:34
FILED
HONRY COUNTY

LUNA SHARKY OF MEDIA

CERTIFICATION REGARDING GUARDIAN *AD LITEM*

I certify that there is no Guardian *ad Litem* appointed in the case at this time.

Diana L. Palumbo, Paralegal to Brana J. Williams
Print name

Date: February 26, 2024

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

COURTESY OF
LUNA SHARK MEDIA

Housand, Krystle

From: Diana Palumbo <dianap@indigofamilylaw.com>
Sent: Monday, February 26, 2024 10:55 AM
To: Housand, Krystle
Cc: Johana Bufford; Cindy Lemon-Scott; Joi Page
Subject: John-Paul Miller v. Mica Acacia Miller - 2024-DR-26-0419
Attachments: Hearing Request Form - MTR.docx; Motion for Temporary Relief FILED 2-23-24.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.

Good morning,

Attached is a hearing request form for a 15-minute motion hearing in the above matter.

A filed copy of the Motion is attached for your reference.

Thanks.

Diana L. Palumbo | Paralegal | 843-215-6100



2055 Glenns Bay Road, Surfside Beach, SC 29575

PLEASE NOTE THAT THIS IS A COMPANY EMAIL AND NOT INTENDED FOR PERSONAL USE.

CONFIDENTIALITY NOTICE: This e-mail has been sent from a law firm. It may contain privileged and confidential information intended solely for the use of the above named. If you are not an intended recipient, you are hereby notified that any dissemination or duplication of this e-mail or attachment(s), if any, is prohibited, and that there shall be no waiver of any privilege or confidence by your receipt of this transaction. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law. If you are unsure whether you are an intended recipient of this e-mail, please immediately contact Indigo Family Law, LLC.

STATE OF SOUTH CAROLINA)

COUNTY OF HORRY)

JOHN-PAUL MILLER,)

Plaintiff,)

vs.)

MICA ACACIA MILLER,)

Defendant.)

IN THE FAMILY COURT
15th JUDICIAL CIRCUIT

**MOTION AND ORDER INFORMATION
FORM AND COVERSHEET**

Docket No. 2024-DR-26- **419**

Plaintiff's Attorney:
Brana J. Williams, Bar No. 64193
Address:
2055 Glens Bay Road
Surfside Beach, SC 29575
Phone: 843-215-6100 Fax 843-215-6105
E-mail: brana@indigofamilylaw.com Other:

Defendant's Attorney:
_____, Bar No. ____
Address:

Phone: _____ Fax _____
E-mail: _____ Other: _____

- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
- FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
- PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I: Hearing Information

Nature of Motion: Motion for Temporary Relief

Estimated Time Needed: 15 Minutes

Court Reporter Needed: **YES** / **NO**

SECTION II: Motion/Order Type

- Written motion attached**
- Form Motion/Order**

I hereby move for relief or action by the court as set forth in the attached proposed order.

Brana J Williams

Signature of Attorney for Plaintiff / Defendant

February 23, 2024

Date submitted

SECTION III: Motion Fee

- PAID – AMOUNT: \$25.00**
- EXEMPT:**
 - (check reason) Rule to Show Cause in Child or Spousal Support
 - Domestic Abuse or Abuse and Neglect
 - Indigent Status State Agency v. Indigent Party
 - Sexually Violent Predator Act Post-Conviction Relief
 - Motion for Stay in Bankruptcy
 - Motion for Publication Motion for Execution (Rule 69, SCRPC)
 - 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: _____
- Other: _____

JUDGE'S SECTION

Motion Fee to be paid upon filing of the attached order.

Other:

JUDGE CODE _____ Date: _____

Judge Signature: _____

Collected by: VH

Date Filed: 2-23-24

CLERK'S VERIFICATION

MOTION FEE COLLECTED: \$ 25.00

CONTESTED – AMOUNT DUE: \$ _____

PAID

Custodial Parent (if applicable): N/A

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

JOHN-PAUL MILLER,

PLAINTIFF,

V.

MICA ACACIA MILLER,

DEFENDANT.

IN THE FAMILY COURT
OF THE
FIFTEENTH JUDICIAL CIRCUIT

CASE NO.: 2024-DR-26-419

NOTICE OF MOTION AND
MOTION FOR TEMPORARY RELIEF

TO: MICA ACACIA MILLER, ABOVE-NAMED DEFENDANT

YOU WILL PLEASE TAKE NOTICE that Plaintiff, by and through his undersigned counsel of record, will move before the Presiding Judge of the Family Court at the Horry County Judicial Complex, on the fifth (5th) day hereafter, or as soon as this matter may be heard, requesting certain *pendente lite* relief; and, at that time, you should appear before the Presiding Judge for the purpose of presenting evidence, if you have any, relative to the following issues:

1. For an order granting Plaintiff exclusive use and possession of the home and its contents, located at [REDACTED] Myrtle Beach, SC 29588, which is owned by the church where he is employed as a pastor;
2. For an order granting Plaintiff use of the Honda Accord and granting Defendant use of the Honda CRV and requiring that each be responsible for the associated expenses of the vehicle each is driving;
3. For an order subjecting the parties to a "no adverse contact order" (NACO), which will restrain the parties from engaging, directly or indirectly, in any adverse conduct towards one another including but not limited to following or stalking the other party;

4. For an order restraining Defendant from threatening, harming, molesting, bothering, stalking, interfering with, following, or from any adverse contact;

5. For an order of this Court restraining the parties from making social media posts about the other party, any current paramours or spouses, and about any legal actions pending that involve the parties on any site owned, controlled or edited by either party;

6. Due to Plaintiff's employment as a pastor, he requests an order of this Court restraining both parties from mentioning or making disparaging remarks about the other party to anyone, including church or school employees or church members, whether directly, or on social media, or at either party's place of employment, or to co-workers, or to new significant others;

7. For an order restraining the parties from disposing, encumbering or dissipating any marital assets acquired during the parties' marriage and from changing any policies or beneficiaries of life, hazard, health, automobile, dental or other insurance until such time as a final hearing on the case;

8. For an order requiring the parties to be responsible for any debt in his or her respective name and for an order restraining Defendant from entering into any further debt on behalf of Plaintiff and that any debts that Defendant does enter into shall be solely her responsibility;

9. For an Order awarding Plaintiff, a reasonable amount of attorney's fees, and suit costs of and from Defendant; and

10. For such other and further relief as this Court may deem just and proper.

Brana Williams

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

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 February 2024
in Surfside Beach, South Carolina

COURTESY OF
LUNA SHARK MEDIA

STATE OF SOUTH CAROLINA)

COUNTY OF HORRY)

JOHN-PAUL MILLER,)

Plaintiff,)

vs.)

MICA ACACIA MILLER,)

Defendant.)

IN THE FAMILY COURT
15TH JUDICIAL CIRCUIT

FAMILY COURT COVERSHEET

Docket No. 2024-DR-26-419

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: Brana J. Williams SC Bar # 64193
Address: 2055 Glens Bay Road Telephone # 843-215-6100
Surfside Beach, SC 29575 Fax # 843-215-6105
Email: brana@indigofamilylaw.com Other: dianap@indigofamilylaw.com

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:

Brana J Williams

Brana J. Williams

Date: February 22, 2024

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 (4/2021)

PAID

SCANNED

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

Date 2-23-25

Custodial Parent (if applicable): _____

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. Determination of indigency shall be in the sole discretion of the Chief Judge for Administrative Purposes. Application of a party to be exempt from payment of neutral fees due to indigency should be filed prior to the scheduling of the ADR conference.

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, SCRCP, 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

JOHN-PAUL MILLER,

PLAINTIFF,

V.

MICA ACACIA MILLER,

DEFENDANT.

IN THE FAMILY COURT
OF THE
15TH JUDICIAL CIRCUIT

CASE NO. 2024-DR-26-419

SUMMONS
(Separate Support and Maintenance)

TO: MICA ACACIA MILLER, ABOVE-NAMED DEFENDANT

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to said Complaint on Indigo Family Law, LLC, 2055 Glens Bay Road, Surfside Beach, South Carolina 29575-4831, within thirty (30) days after the service hereof, exclusive of the date of such service; and if you fail to answer this Complaint within thirty (30) days, judgment by default will be rendered against you in Court for the relief demanded in the Complaint.

Brana J Williams

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

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 February 2024
in Surfside Beach, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

JOHN-PAUL MILLER,

PLAINTIFF,

V.

MICA ACACIA MILLER,

DEFENDANT.

IN THE FAMILY COURT
OF THE
FIFTEENTH JUDICIAL CIRCUIT

CASE NO: 2024-DR-26-419

COMPLAINT
(Separate Support And Maintenance)

FILED
FEBRUARY 23 2024
P. 3:48
Horry County

TO: MICA ACACIA MILLER, ABOVE-NAMED DEFENDANT

Plaintiff, John-Paul Miller, by and through his undersigned attorney, would respectfully allege and show unto this Honorable Court the following:

Jurisdiction

1. Plaintiff is a citizen and resident of the County of Horry, State of South Carolina, and has been so for more than three (3) months prior to the commencement of this action.
2. Defendant is a citizen and resident of the County of Horry, State of South Carolina, and have been so for more than three (3) months prior to the commencement of this action.
3. The parties are husband and wife, having been married on November 7, 2017, in Horry County, South Carolina.
4. There were no children born of this marriage and no children are expected from their union.
5. The parties separated on or about February 12, 2024, and they have lived continuously separate and apart, without cohabitation, since that date.

6. This is an action for the right to live separate and apart, equitable distribution/special equity, conditions on conduct, attorney's fees and costs and other incidental relief.

7. Plaintiff is informed and believes that this Court has jurisdiction of the parties and the subject matter before it.

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

8. Because of the serious nature of the marital difficulties which exist between the parties, Plaintiff does now intend to live separate and apart from Defendant without any form of cohabitation with her.

9. Plaintiff is informed and believes that he is entitled to live separate and apart from the Defendant, as if they are were longer husband and wife and requests an Order of Separate Support and Maintenance.

FOR A SECOND CAUSE OF ACTION
(Equitable Distribution and Special Equity)

10. Plaintiff alleges that during the parties' marriage, they have acquired both real and personal property, as well as marital debt, which are subject to apportionment by this Court.

11. Plaintiff alleges he has made both direct contributions, and those of an indirect nature, of industry and labor to the acquisition, preservation and maintenance of marital property.

12. Therefore, Plaintiff requests an order of this Court granting him equitable distribution of and special equity in the parties' property, whether real, personal or mixed and irrespective of title; and equitably apportioning their marital debt.

FOR A THIRD CAUSE OF ACTION
(Occupancy of Home)

13. Plaintiff alleges that he currently resides in the home located at [REDACTED] Myrtle Beach, SC 29588 and he has lived there since the separation. He further alleges that he has continued to pay all costs associated with the home since the parties' separation, whether himself or as a condition of his employment.

14. Plaintiff requests an order of this Court granting Plaintiff exclusive occupancy, use, and possession of the home, real property and its contents and further requests an order restraining Defendant from entering the home located at 246 Coldwater Circle, Myrtle Beach, SC 29588, *pendente lite* and permanently

FOR A FOURTH CAUSE OF ACTION
(Personal Vehicles)

15. During the course of the parties' marriage, Plaintiff and Defendant have had use of his or her own personal vehicles.

16. Plaintiff is informed and believes that the parties should be entitled to exclusive use and control of their own personal vehicles, *pendente lite* and permanently.

FOR A FIFTH CAUSE OF ACTION
(Conditions on Conduct)

17. To facilitate as much as possible under the circumstances and a moderate atmosphere between the parties, Plaintiff requests an Order of this court subjecting the parties to a "no adverse contact order" (NACO) which will restrain the parties from engaging, directly or indirectly, in any adverse conduct towards one another including but not limited to following or stalking the other party, *pendente lite* and permanently.

18. An order which restrains Defendant from threatening, harming, molesting, bothering, stalking, interfering with, following, or from any adverse contact, *pendente lite*

and permanently.

19. Plaintiff requests an order of this Court restraining the parties from making social media posts about the other party, any current paramours or spouses, and about any legal actions pending that involve the parties on any site owned, controlled or edited by either party, *pendente lite* and permanently.

20. Plaintiff requests an order of this Court restraining both parties from accessing the other's party's social media sites or to use the other party's social media identity, *pendente lite* and permanently.

21. Due to Plaintiff's employment as a pastor, he requests an order of this Court restraining both parties from mentioning or making disparaging remarks about the other party to anyone, including employees of the church or school or members of the church, whether directly, or on social media, or at either party's place of employment, or to co-workers, or to new significant others, *pendente lite* and permanently.

22. Plaintiff is informed and believes that Defendant will attempt to hide or sell marital assets in an attempt to deprive Plaintiff of an equitable distribution. Plaintiff is also fearful of what Defendant will do when served these papers. Plaintiff is informed and believes that both parties should be restrained from disposing, encumbering or dissipating any marital assets acquired during the parties' marriage and from changing any policies or beneficiaries of life, hazard, health, automobile, dental or other insurance until such time as a final hearing on the case, *pendente lite* and permanently.

23. Plaintiff requests an order of this Court restraining Defendant from entering into any further debt on behalf of Plaintiff and that any debts that Defendant does enter into shall be solely her responsibility, *pendente lite* and permanently.

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

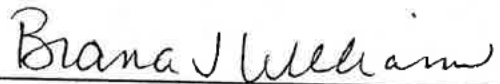
24. Solely based on the actions of Defendant, Plaintiff has been forced to retain the services of an attorney to bring this action and thereby be responsible for the costs of doing so.

25. Accordingly, given that Defendant is the reason Plaintiff has been forced to bring this action, as well as other factors, Plaintiff requests an order of this Court requiring Defendant to pay all the fees and attorney costs and the costs of bringing this action.

WHEREFORE, Plaintiff prays that this Honorable Court inquire into this matter and that it issue its Order awarding unto him the following relief *pendente lite* and permanently:

- a. An Order of Separate Support and Maintenance from Defendant and allowing the parties to continue to live separate and apart as if unmarried;
- b. An order for equitable distribution of and special equity in the parties' property, whether real, personal or mixed and irrespective of title; and equitably apportioning their marital debt, *pendente lite* and permanently;
- c. An order granting Plaintiff the exclusive use, possession, of the home located at [REDACTED] Myrtle Beach, SC 29588, and with all of its contents;
- d. An order granting Plaintiff and Defendant exclusive use of their personal vehicles;
- e. An order subjecting the parties to a "no adverse contact order" (NACO), which will restrain the parties from engaging, directly or indirectly, in any adverse conduct towards one another including but not limited to following or stalking the other party;
- f. An order restraining Defendant from threatening, harming, molesting, bothering, stalking, interfering with, following, or from any adverse contact;

- g. An order restraining the parties from making social media posts about the other party, any current paramour(s) or spouse(s) and about any legal actions pending that involve the parties on any site owned, controlled or edited by either party;
- h. An order restraining the parties from accessing the other's social media sites or from use of the other party's social media identity;
- i. An order restraining the parties from mentioning or making disparaging remarks about the other party to anyone, including employees of the church or school or members of the church, whether directly, or on social media, or at either party's place of employment, or to co-workers, or to new significant others;
- j. An order restraining the parties from disposing, encumbering or dissipating any marital assets, from changing any policies or beneficiaries of life, hazard, health, automobile, dental or other insurance;
- k. An order restraining the Defendant from entering into any further debt on behalf of Plaintiff and that any debts Defendant does enter into shall be solely her responsibility;
- l. An order awarding Plaintiff a reasonable amount of attorney's fees and suit costs of and from Defendant; and
- m. For such other and further relief as this Court may deem just and proper.



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

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

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

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

JOHN-PAUL MILLER,

PLAINTIFF,

V.

MICA ACACIA MILLER,

DEFENDANT.

IN THE FAMILY COURT
OF THE
15TH JUDICIAL CIRCUIT

Case No. 2024-DR-26-419

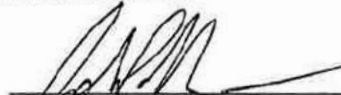
VERIFICATION

FILED
FEB 23 P 3:49
FAMILY COURT
15TH JUDICIAL CIRCUIT
HORRY COUNTY
SOUTH CAROLINA

PERSONALLY, appeared before me, John-Paul Miller, Plaintiff in this action, who being duly sworn, deposes and under oath states:


Plaintiff has read the allegations contained in the attached Complaint, which was prepared by Plaintiff's attorney based upon information that Plaintiff personally furnished to the said attorney. The allegations contained in the attached pleadings are true and correct based upon the personal knowledge of Plaintiff, except for allegations, which are based upon information and belief, and to those allegations, Plaintiff believes the same to be true. Plaintiff has authorized said attorney to file the attached pleadings, to present said pleadings to the Court, and to secure any necessary Orders based thereon, and to secure service upon the adverse party in compliance with the SCRCF.

FURTHER THE AFFIANT SAYETH NAUGHT.



John-Paul Miller

SUBSCRIBED and sworn to before me this 23rd day of February 2024.



Notary Public for South Carolina
My commission expires: 2-4-31

