

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 COMMONS,
a/k/a SOLID ROCK CHURCH,

DEFENDANTS.

IN THE FAMILY COURT
OF THE
FIFTEENTH JUDICIAL CIRCUIT

CASE NO.: 2024-DR-26-0860

DEFENDANT JOHN-PAUL MILLER'S
ANSWER AND COUNTERCLAIMS TO
PLAINTIFF'S COMPLAINT

FILED
HORRY COUNTY
2024 JUN -6 P 23
RENEE N. EMMETT
CLERK OF COURT
HORRY COUNTY, SC

Defendant, John-Paul Miller, answering Plaintiff's Complaint, respectfully alleges
as follows:

FOR A FIRST DEFENSE
(General Denial)

1. Each and every allegation of the Plaintiff's Complaint, which is not hereinafter specifically admitted, modified or explained, is denied and strict proof is demanded thereof.

FOR A SECOND DEFENSE
(Response to Plaintiff's Complaint)

2. Defendant John-Paul Miller admits the allegations contained in **Paragraphs One (1), Two (2), Three (3), Four (4), Five (5), Eight (8), Ten (10), Eleven (11), Thirteen (13), Fifteen (15), and Seventeen (17)** of the Amended Complaint.

3. Defendant John-Paul Miller is without sufficient information in which to admit or deny **Paragraphs Seven (7), Eighteen (18), Nineteen (19), Twenty (20), Twenty-**

One (21), Twenty-Two (22), Twenty-Three (23), Twenty-Five (25), and Twenty-Eight (28). Accordingly, these Paragraphs are denied.

4. Defendant denies the allegations contained in **Paragraphs Six (6), Fourteen (14), Twenty-Four (24), Twenty-Six (26), Twenty-Seven (27), Twenty-Nine (29), Thirty (30), Thirty-One (31), Thirty-Four (34), Thirty-Eight (38), Thirty-Nine (39), Forty (40), Forty-One (41), Forty-Two (42), Forty-Four (44), Forty-Five (45), Forty-Seven (47), Forty-Eight (48), Forty-Nine (49), and Fifty-One (51)** of the Amended Complaint and demands strict proof thereof.

5. Defendant John-Paul Miller joins Plaintiff in requesting the relief requested in **Paragraphs Thirty-Three (33), Thirty-Five (35), and Thirty-Six (36)** of the Amended Complaint and requests that the Restraining Orders requested in these Paragraphs be mutual in nature and scope.

6. Defendant John-Paul Miller is informed and believes that no response is required for **Paragraphs Nine (9), Twelve (12), Sixteen (16), Thirty-Two (32), Thirty-Seven (37), Forty-Three (43), Forty-Six (46), and Fifty (50)** of Plaintiff's Amended Complaint.

FOR A THIRD DEFENSE AND FIRST COUNTERCLAIM
(Restrictions on Conduct)

7. 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 restrict 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.

8. An order restricting both parties from making or allowing others to make

disparaging remarks about the other party, *pendente lite* and permanently.

FOR A FOURTH DEFENSE AND SECOND COUNTERCLAIM
(Attorney's Fees and Costs)

9. Based on the actions of Plaintiff, Defendant has been forced to retain the services of an attorney to defend this action and thereby, be responsible for the costs of doing so.

10. Defendant is informed and believes that Plaintiff should be responsible for his attorney's fees and costs. Accordingly, he requests an order of this Court requiring Plaintiff to pay all of Defendant's attorney's fees and costs associated with this action.

WHEREFORE, having set forth the Answer, Defendant requests that the Court grant the parties the following relief:

- a. For an order granting Defendant's requests for mutual restrictions on conduct, *pendente lite* and permanently;
- b. For an order denying Plaintiff's request for a posthumous name change;
- c. For an order denying Plaintiff's request for contributions towards a financial forensic expert;
- d. For an order denying Plaintiff's request for attorney's fees and costs associated with this action, *pendente lite* and permanently;
- e. For an order requiring Plaintiff to pay Defendant's attorney's fees and costs incurred in this litigation, *pendente lite* and permanently; and
- f. For such other and further relief as to this Honorable Court may deem just and proper.



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Dated this 31st day of May 2024
in Surfside Beach, South Carolina

COURTESY OF
LUNA SHARK MEDIA

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

IN THE FAMILY COURT FOR THE
FIFTEENTH JUDICIAL CIRCUIT

DOCKET NO.: 2024-DR-26-00860

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.

**DEFENDANT SOLID ROCK
MINISTRIES' ANSWER AND
COUNTERCLAIMS TO PLAINTIFF'S
AMENDED COMPLAINT**

FILED
HORRY COUNTY
2024 JUN -6 P 4:12
RENEEN N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

The Defendant, Solid Rock Ministries, Inc., hereinafter Defendant Solid Rock Ministries, answering the Amended Complaint of the Plaintiff, would respectfully show and allege as follows:

FOR A FIRST DEFENSE

Each and every allegation contained in the Plaintiff's Amended Complaint not hereinafter specifically admitted, qualified or explained is denied and strict proof demanded thereof.

FOR A SECOND DEFENSE

1. Defendant Solid Rock Ministries admits the allegations in paragraph 1 of Plaintiff's Amended Complaint, upon information and belief.
2. Defendant Solid Rock Ministries admits the allegations in paragraph 2 of Plaintiff's Amended Complaint, upon information and belief.
3. Defendant Solid Rock Ministries admits the allegations in paragraph 3 of Plaintiff's Amended Complaint, upon information and belief.

SCANNED

4. Defendant Solid Rock Ministries admits the allegations in paragraph 4 of Plaintiff's Amended Complaint, upon information and belief.
5. Defendant Solid Rock Ministries admits the allegations in paragraph 5 of Plaintiff's Amended Complaint.
6. The allegations in paragraph 6 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.
7. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 8 of Plaintiff's Amended Complaint and therefore denies the same.
8. The allegations in paragraph 8 of Plaintiff's Amended Complaint contain a conclusion of law, and as such require no response from this Defendant. To the extent a response is deemed required, Defendant Solid Rock Ministries denies the allegations set forth in Paragraph 8 and demands strict proof thereof.
9. In responding to paragraph 9, Defendant Solid Rock Ministries re-alleges and incorporates its responses to Paragraphs 1 through 8 above as if fully restated herein.
10. Defendant Solid Rock Ministries admits the allegations in paragraph 10 of Plaintiff's Amended Complaint, upon information and belief.
11. Defendant Solid Rock Ministries admits the allegations in paragraph 11 of Plaintiff's Amended Complaint, upon information and belief.
12. In responding to paragraph 12, Defendant re-alleges and incorporates its responses to Paragraphs 1 through 11 above as if fully restated herein.
13. Paragraph 13 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response

is deemed required, Defendant Solid Rock Ministries denies the allegations in Paragraph 13 of the Amended Complaint.

14. Paragraph 14 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries denies the allegations in Paragraph 14 of the Amended Complaint.

15. Paragraph 15 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries denies the allegations in Paragraph 15 of the Amended Complaint.

16. In responding to paragraph 16, Defendant re-alleges and incorporates its responses to Paragraphs 1 through 15 above as if fully restated herein.

17. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 17 of Plaintiff's Amended Complaint and therefore denies the same.

18. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 18 of Plaintiff's Amended Complaint and therefore denies the same.

19. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 19 of Plaintiff's Amended Complaint and therefore denies the same.

20. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 20 of Plaintiff's Amended Complaint and therefore denies the same.

21. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 21 of Plaintiff's Amended Complaint and therefore denies the same.

22. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 22 of Plaintiff's Amended Complaint and therefore denies the same.

23. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 23 of Plaintiff's Amended Complaint and therefore denies the same.

24. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 24 of Plaintiff's Amended Complaint and therefore denies the same.

25. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 25 of Plaintiff's Amended Complaint and therefore denies the same.

26. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 26 of Plaintiff's Amended Complaint and therefore denies the same.

27. The allegations in paragraph 27 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

28. Defendant Solid Rock Ministries lacks knowledge or information to form a belief as to the truth of the allegations set forth in paragraph 28 of Plaintiff's Amended Complaint and therefore denies the same.

29. The allegations in paragraph 29 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

30. The allegations in paragraph 30 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

31. The allegations in paragraph 31 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

32. In responding to paragraph 32, Defendant re-alleges and incorporates its responses to Paragraphs 1 through 31 above as if fully restated herein.

33. The allegations in paragraph 33 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

34. The allegations in paragraph 34 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

35. The allegations in paragraph 35 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

36. The allegations of paragraph 36 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

37. In responding to paragraph 37, Defendant re-alleges and incorporates its responses to Paragraphs 1 through 36 above as if fully restated herein.

38. Paragraph 38 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response

is deemed required, Defendant Solid Rock Ministries takes no position with regard to with regard to paragraph 38 of Plaintiff's Amended Complaint.

39. Paragraph 39 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries takes no position with regard to with regard to paragraph 39 of Plaintiff's Amended Complaint

40. Paragraph 40 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries takes no position with regard to paragraph 40 of Plaintiff's Amended Complaint.

41. Paragraph 41 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries takes no position with regard to paragraph 41 of Plaintiff's Amended Complaint.

42. Paragraph 42 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries takes no position with regard to paragraph 42 of Plaintiff's Amended Complaint.

43. In responding to paragraph 43, Defendant re-alleges and incorporates its responses to Paragraphs 1 through 42 above as if fully restated herein.

44. The allegations in paragraph 44 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

45. The allegations in paragraph 45 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

46. In responding to paragraph 46, Defendant re-alleges and incorporates its responses to Paragraphs 1 through 45 above as if fully restated herein.

47. Paragraph 47 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries denies the allegations in paragraph 47 and strict proof is demanded thereof.

48. Paragraph 48 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries denies the allegations in paragraph 48 and strict proof is demanded thereof.

49. Paragraph 49 of Plaintiff's Amended Complaint does not contain an allegation directed at Defendant Solid Rock Ministries and therefore no response is required. To the extent a response is deemed required, Defendant Solid Rock Ministries denies the allegations in paragraph 49 and strict proof is demanded thereof.

50. In responding to paragraph 50, Defendant re-alleges and incorporates its responses to Paragraphs 1 through 49 above as if fully restated herein.

51. The allegations in paragraph 51 of Plaintiff's Amended Complaint are denied and strict proof is demanded thereof.

Restraining Orders

52. The Defendant Solid Rock Ministries requests a restraining order that restrains the Plaintiff from coming about the church campus, bothering, harassing, contacting, or otherwise persecuting

church members or officials either at their place of worship, or at their homes, places of employment, or at any other place and by any other means. This request is made both *pendente lite* and permanently.

Attorney's Fees & Expert Fees

53. Defendant Solid Rock Ministries continues to believe that this case should be amicably resolved; however, in the event such a resolution is not accomplished due to the Plaintiff's actions or positions, Defendant Solid Rock Ministries would respectfully request that the Court award it fees and costs including but not limited to, attorney's fees, vendor fees, expert witness fees, and court costs.

WHEREFORE, having fully responded to Plaintiff's Complaint, Defendant Solid Rock Ministries would respectfully request this Court:

- A. Inquire into the matter and issue such orders as are just and proper;
- B. Grant it the affirmative relief requested in this Counterclaim; and
- C. For such other and further relief as this Court may deem just and proper.

Russell B. Long, P.A.

BY: 

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Myrtle Beach, SC
June 6, 2024