

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )

IN THE FAMILY COURT OF THE  
FIFTEENTH JUDICIAL COURT  
Civil Action No. 01-DR-26-

SUSAN MILLER, )  
Social Security [REDACTED] )  
Plaintiff, )

vs. )

REGINAL WAYNE MILLER, )  
Social Security [REDACTED] )  
Defendant. )

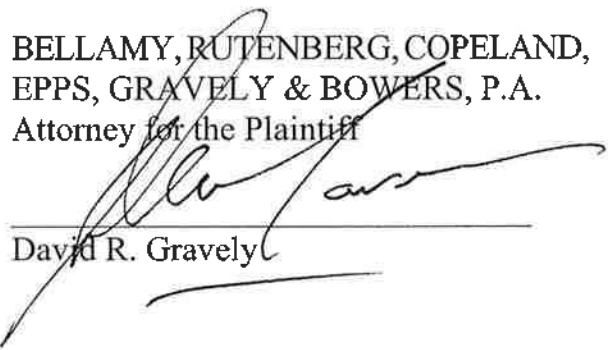
FILED  
01 MAY 10 AM 9:59

**SUMMONS FOR RELIEF**  
(Complaint Served)

TO: THE DEFENDANT ABOVE NAMED:

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 the said Complaint on the subscribers at their office at 1000 29th Avenue North, Myrtle Beach, South Carolina 29577, within thirty (30) days after the service hereof; exclusive of the day of such service; and if you fail to do so, the Plaintiff in this action will apply to the court for judgment by default for the relief demanded in the Complaint and a judgment will be rendered against you.

BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.  
Attorney for the Plaintiff

  
\_\_\_\_\_  
David R. Gravely

Myrtle Beach, South Carolina  
May 9, 2001

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )

IN THE FAMILY COURT OF THE  
FIFTEENTH JUDICIAL COURT  
Civil Action No. 01-DR-26-

SUSAN MILLER, )  
Social Security [REDACTED] )  
Plaintiff, )

vs. )

REGINAL WAYNE MILLER, )  
Social Security [REDACTED] )  
Defendant. )

01 MAY 10 AM 9:59  
FILED

COMPLAINT

The Plaintiff, complaining of the Defendant, would respectfully show and allege unto this Honorable Court as follows:

1. The Plaintiff and Defendant are citizens and residents of the County of Horry, State of South Carolina, and have been for a period in excess of one year prior to the commencement of this action and are subject to the jurisdiction of this Honorable Court.
2. The Plaintiff and Defendant are husband and wife, having been married on April 14, 1974. Three children have been born of this marriage, namely John-Paul Miller, whose date of birth is May 20, 1979; Patrick Ryan Miller, whose date of birth is December 7, 1983; and Lacy Noelle Miller, whose date of birth is December 27, 1990.
3. The parties last resided together in Horry County, South Carolina on February 25, 2001 when the Defendant left the parties' marital residence, and have remained separate and apart without cohabitation since February 25, 2001.

4. The Plaintiff is informed and believes she is entitled to an order of separate support and maintenance from the Defendant.
5. The Plaintiff has been primarily responsible for the necessary care, control and maintenance of the parties' minor children, and she is informed and believes that she is a fit and proper person to be awarded the sole care, custody and control of the parties' minor children, both pendente lite and permanently.
6. The Plaintiff seeks an order of this Court requiring the Defendant to pay unto her child support in an amount established by the South Carolina Department of Social Services Guidelines, both pendente lite and permanently.
7. The Plaintiff seeks an order of this Court granting her and the parties' minor children use and possession of the marital residence located at 1859 Southwood Drive, Surfside Beach, South Carolina, both pendente lite and permanently.
8. The Plaintiff seeks an order of this Court granting her use and possession of the vehicle which is presently in her possession, both pendente lite and permanently.
9. The Plaintiff seeks an order of this Court requiring the Defendant to pay unto the Plaintiff a suitable sum of alimony and/or spousal support on a periodic basis in an amount to be established by this Court both pendente lite and permanently.
10. The Plaintiff has aided and assisted in the accumulation of all assets acquired during the marriage, not only by her direct contribution, but also by her indirect contribution. The Plaintiff has foregone various opportunities for the betterment of the marriage and, based upon her contributions, the Plaintiff is entitled to an equitable apportionment of all assets acquired during the marriage, regardless of title, on account of her contributions thereto, in such sums, amounts, and manners as this court may deem fit, proper and equitable.

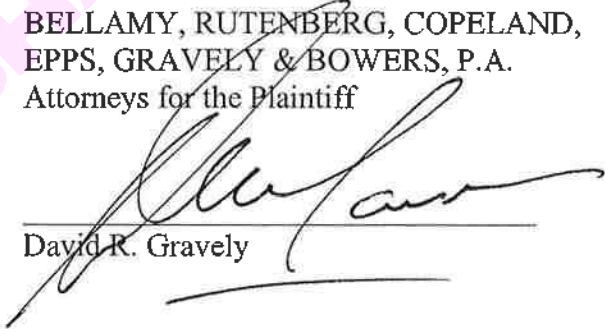
11. That as a result of the conduct of the Defendant, the Plaintiff has found it necessary to institute this proceeding and thereby has and will incur substantial attorney's fees, costs and suit money.
12. The Plaintiff is informed and believes she is entitled to an award of pendente lite attorney's fees, costs and suit money as well as such an award on a permanent basis, to enable her to properly and adequately prepare and present her case.
13. The Plaintiff believes it may become necessary, in order to properly present her case, to conduct discovery, and she requests this Court to permit both parties to engage in discovery in the preparation and trial of this case pursuant to the South Carolina Rules of Civil Procedure.
14. The Plaintiff seeks a restraining order prohibiting the Defendant from assigning, pledging, transferring, disposing of, dissipating, hypothecating or in any manner altering any marital asset whether titled individually or jointly or whether real, personal or mixed, without prior order of this court.
15. The Plaintiff seeks an order restraining and prohibiting the Defendant from calling, contacting, harassing, molesting, coming about, or interfering with the Plaintiff.

WHEREFORE, the Plaintiff prays as follows:

- a. For an order of separate support and maintenance;
- b. Custody of the parties' minor children, both pendente lite and permanently;
- c. Child support from the Defendant, both pendente lite and permanently;
- d. Alimony from the Defendant, both pendente lite and permanently;
- e. Equitable division of all marital assets;
- f. Attorney fees and costs of this action from the Defendant, both pendente lite and

- permanently;
- g. Use and possession of the marital residence, both pendente lite and permanently;
  - h. Use and possession of the vehicle presently in her possession, both pendente lite and permanently;
  - i. Discovery;
  - j. For a mutual restraining order prohibiting each party from assigning, pledging, transferring, disposing of, dissipating, hypothecating or in any manner altering any marital asset whether titled individually or jointly or whether real, personal or mixed, without prior order of this court; and
  - k. An order restraining and prohibiting the Defendant from calling, contacting, harassing, molesting, coming about, or interfering with the Plaintiff.
  - l. For such other and further relief as this Honorable Court might deem just and proper.

BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.  
Attorneys for the Plaintiff

  
\_\_\_\_\_  
David R. Gravely

Myrtle Beach, South Carolina

May 9, 2001

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )

VERIFICATION

FILED  
01 MAY 10 AM 9:59

PERSONALLY appeared before me the Plaintiff in the foregoing action who, being duly sworn, says:

- (a) That this Deponent has read the allegations contained in the attached pleading consisting of four (4) pages.
- (b) That the attached pleading was prepared by this Deponent's attorney based upon information this Deponent has personally furnished to said attorney.
- (c) That the allegations contained in the attached pleading are true and correct, and are based upon the personal knowledge of this Deponent, except for those allegations which are based upon this Deponent's information and belief and, as to those, this Deponent verily believes the same to be true.
- (d) That this Deponent has authorized said attorney to file the attached pleading, to present the same to the court and secure any necessary orders based thereon, and to secure service upon the adverse party of the attached pleading and necessary process based thereon.

Susan Miller  
Susan Miller

SWORN to before me this 9th  
day of May, 2001.

Greg Deal (L. S.)  
Notary Public for South Carolina  
My Commission Expires: 1-30-2005