

STATE OF SOUTH CAROLINA )  
)  
COUNTY OF HORRY )  
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)  
)  
)

**2025CV261090093**  
CIVIL CASE NUMBER  
  
**IN THE MAGISTRATE'S COURT**  
  
**SUMMONS**

John Paul Miller  
4869 hwy 17 bypass  
Myrtle Beach, SC 29577

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PLAINTIFF(S)

Vs

Samuel [REDACTED] Rickman  
[REDACTED] Woodfield Dr  
Myrtle Beach, SC 29588-7508

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DEFENDANT(S)

**TO THE DEFENDANT(S) NAMED ABOVE:**

**YOU ARE SUMMONED** and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within THIRTY days from the first day after receipt of this summons. Your Answer must be received by the:

**Myrtle Beach Magistrate Court**  
**1201 21st Avenue North**  
**Myrtle Beach, SC 29577**  
**Phone: (843) 915-5293**  
**Fax: (843) 444-6131**

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:

\_\_\_\_\_  
JUDGE

**READ ATTACHED INSTRUCTIONS CAREFULLY**

January 10, 2025



## **SUPPLEMENT TO PLAINTIFF'S COMPLAINT**

### **FACTS COMMON TO ALL COUNTS**

1. Defendant has engaged in a persistent pattern of harassment against Plaintiff, including screaming and demonstrating against Plaintiff's mere existence in public locations throughout Horry County.

2. Defendant's presence scares Plaintiff because Defendant often smells of marijuana smoke. Plaintiff is unaware of what other drugs Defendant uses on a daily basis but fears that Defendant may not be able to control himself or his anger due to his habitual drug use.

3. Defendant regularly posts videos or comments about Plaintiff on social media, all of which cause Plaintiff severe emotional distress and public humiliation.

4. Though Defendant and those like him refer to the demonstrations as "protests", they are anything but legitimate and do not protest anything other than Plaintiff's existence. In fact, the "rallies" are nothing more than poorly organized mobs harassing and stalking the Plaintiff and others.

5. Defendant helped to create and perpetuate a fictional tale about Plaintiff and his late wife in an effort to create a cause that Defendant can "serve" through false concern and outrage.

6. Defendant uses Plaintiff's name and image to promote his social media accounts and status among the other stalkers and demonstrators.

7. Defendant's conduct is intended to enrage the public, harm Plaintiff, and enrich Defendant through monetizing social media accounts, channels, and platforms.

8. Much of Defendant's conduct is carried out under the guise that he is helping Plaintiff's late wife and protesting domestic violence, a crime that Plaintiff was never charged with committing and for which there is no factual basis.

9. The interest that a subset of people has in Plaintiff, and in the life of his late wife, was created entirely by Defendant and others like him who have determined on their own that Plaintiff is guilty of a crime that law enforcement officials have cleared him of or never charged him with committing.

10. Defendant has published false and defamatory statements about Plaintiff on various social media platforms, including Facebook, with the intent to damage Plaintiff's reputation and interfere with his ministry.

11. Defendant's actions have been calculated to intimidate Plaintiff from appearing in public and conducting his normal activities, including the operation of his church.

12. Defendant's actions have been calculated to intimidate or influence others from congregating at Plaintiff's church or with Plaintiff in any setting.

13. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to live his life without interference from Defendant or others who are influenced by Defendant's actions.

14. As a direct result of Defendant's actions, friends and acquaintances of Plaintiff have expressed reluctance to be seen with Plaintiff or to do business with Plaintiff or his affiliated companies.

15. Defendant's harassment and intimidation of Plaintiff and those associated with him have interfered with Plaintiff's ability to earn a living, conduct church services, minister to his congregation, and maintain relationships with church members and the broader religious community.

16. As a direct result of the Defendant's actions, multiple church members have expressed reluctance to attend services and baptisms, and attendance and participation have declined.

17. Defendant's actions have created a dangerous environment for Plaintiff, placing him in fear for his safety and the safety of others.

18. Nothing being posted or stated about Plaintiff by Defendant is newsworthy or in the public interest.

**AS AND FOR A FIRST CAUSE OF ACTION**  
(Invasion of Privacy)

19. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

20. Defendant engaged in a pattern of intentional, substantial, and unreasonable intrusion upon Plaintiff's life.

21. Defendant's actions served no legitimate purpose and would have caused a reasonable person to suffer substantial emotional distress.

22. Defendant intentionally intruded upon Plaintiff's private affairs and concerns.

23. The intrusion would be highly offensive to a reasonable person.

24. Defendant engaged in a pattern of words and conduct that served no legitimate purpose and caused Plaintiff to reasonably fear for his safety or suffer substantial emotional distress.

25. Defendant's conduct constitutes the unwarranted appropriation or exploitation of Plaintiff's personality and private affairs, with which the public has no legitimate concern, or the wrongful intrusion into Plaintiff's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

26. Defendant invaded Plaintiff's right to privacy in one or more of the following ways: wrongfully appropriating Plaintiff's personality; publicizing the Plaintiff's private affairs, which have no legitimate public concern; or wrongfully intruding into Plaintiff's private affairs.

27. Defendant's actions also violated South Carolina criminal statutes prohibiting harassment and stalking.

28. Law enforcement officers have refused to enforce criminal statutes enacted to protect people like the Plaintiff, leaving Plaintiff no choice but to bring this action.

29. As a direct and proximate result of Defendant's actions, Plaintiff has suffered damages, including emotional distress, reputational harm, anxiety, and other injuries, in an amount to be proven, but not more than \$7,500.00.



## IN THE MYRTLE BEACH MAGISTRATE COURT

### INSTRUCTIONS FOR DEFENDANT

1. If you do not wish to oppose plaintiff's claim you may:
  - a. Contact plaintiff and make an out-of-court settlement with the plaintiff before the trial date and file with the magistrate court a dismissal of the case signed by the plaintiff, or
  - b. Make no answer to the complaint. In that case, the plaintiff will be given a default judgment against you in the amount specified in the complaint.
  
2. If you wish to oppose the claim:
  - a. You must file an answer with the magistrate's court within the time limit specified in the summons. If you fail to answer within that time period, you lose your right to defend the case and the plaintiff may be given a default judgment against you in the amount specified in the complaint. Your answer may be made in writing in a form approved by the magistrate, or your answer may be made orally to the magistrate's court if you appear in person within the time limit specified in the summons.
  - b. If you answer within the specified time, you will be notified of the time and date of the trial. You must maintain a correct mailing address with the court and you must appear for trial. Should you fail to appear, you lose your right to defend the case and the plaintiff may be given a default judgment against you in the amount specified in the complaint.
  - c. At the time for trial you must bring with you all books, papers, witnesses, and evidence you have to establish your defense. You are required to comply with the South Carolina Rules of Evidence.
  - d. At your request the court will issue a subpoena for any witness you may need (you must request the subpoena as soon as possible and before the trial date). There is a fee of \$3.00 for the magistrate to prepare and mail a subpoena. If the subpoena is delivered by a deputy, there is an additional service fee of \$8.00 that must be paid to the court. Further, you will be responsible to the witness for a fee of \$25.00.
  
3. If you desire a jury trial, you must request one in writing at least **five (5)** working days prior to the date set for trial. If no jury trial is timely requested, the matter will be heard and decided by the magistrate.
  
4. If you have a claim against the plaintiff that grows out of the same transaction or occurrence as the plaintiff's claim, you may file a counterclaim. The counterclaim must be filed with the magistrate within the time limit specified in the summons for answering. The counterclaim must be made in writing in a form approved by the magistrate, or it may be made orally to the magistrate's court if you appear in person within the time limit specified in the summons. Your counterclaim will be tried at the same time as the plaintiff's claim if it does not exceed the jurisdiction of the magistrate to hear. If the counterclaim exceeds the magistrate's jurisdiction, the entire matter will be transferred to the circuit court.
  
5. If you have a claim against the plaintiff that does not grow out of the same occurrence or transaction as the plaintiff's claim, you may file a claim (complaint) against the plaintiff. This claim would be heard separate and apart from the plaintiff's claim against you.
  
6. If you are a member of the Armed Services of the United States, please advise the court upon receipt of this summons.
  
7. If you are under 18 years of age, please advise the court upon receipt of this summons.
  
8. If you are a prisoner in any municipal, county, state, or federal jail or prison, please advise the court upon receipt of this summons.
  
9. You may be represented by an attorney, but are not required to have one. The magistrate's court will explain the procedure of the court and will help you prepare papers related to your action if you require such assistance. The court cannot, however, represent you or provide you with an attorney or give you any legal advice.
  
10. If you are a business and are going to be represented by a Non-Lawyer, a Non-Lawyer Authorization Form must be included with your Answer/Counterclaim. (See 33-1-103 SC Code of Laws)

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COUNTY OF HORRY )  
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[REDACTED] Woodfield Dr  
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**DEFENDANT(S)**

On \_\_\_\_\_ I was served with a Complaint requiring me to answer within thirty days from the date of service. My Answer, which is hereby filed with the **Myrtle Beach Magistrate Court**, is as follows:

CHECK ONE:

A.  I contest the jurisdiction of the court based on the following: (use additional pages if necessary)

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B.  I admit everything in the complaint and do not want a trial.

C.  I admit that I am responsible, but not for the total amount claimed by the Plaintiff(s) because: (use additional pages if necessary) \_\_\_\_\_

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D.  I deny that I am responsible at all because: (use additional pages if necessary)

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**YOU MUST FILE THIS DOCUMENT WITH THE COURT WITHIN THIRTY DAYS**

THE DEFENDANT/PLAINTIFF STATES THAT THE INFORMATION CONTAINED IN THIS ANSWER IS TRUE AND CORRECT TO THE BEST OF HIS/HER KNOWLEDGE.

DATED: \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF DEFENDANT(S) (OR ATTORNEY)  
\*\*IF MORE THAN ONE DEFENDANT, ALL MUST FILE ANSWER\*\*

**PLEASE RETURN TO:**  
**Myrtle Beach Magistrate Court**  
**1201 21st Avenue North**  
**Myrtle Beach, SC 29577**  
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