

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Jane Doe #2

Plaintiff,

vs.

John-Paul Miller, Reginald Wayne Miller
a/k/a Reginal Wayne Miller, All Nations
Cathedral Church f/k/a Cathedral Baptist
Church of the Grand Strand, Inc., Solid
Rock Ministries, Inc., Cathedral Hall
Academy f/k/a Grand Strand Academy,

Defendants.

IN THE COURT OF COMMON PLEAS

FIFTEENTH JUDICIAL CIRCUIT

C/A#: 2025-CP-26-01796

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR ORDER OF DEFAULT AND
FOR HEARING ON DAMAGES AS TO
DEFENDANTS REGINALD WAYNE
MILLER A/K/A REGINAL WAYNE
MILLER, ALL NATIONS CATHEDRAL
CHURCH F/K/A CATHEDRAL BAPTIST
CHURCH OF THE GRAND STRAND, INC.
AND CATHEDRAL HALL ACADEMY
F/K/A GRAND STRAND ACADEMY**

The Plaintiff, by and through her undersigned counsel and pursuant to SCRCP 55 does hereby move for an order of default against Defendants Reginald Wayne Miller a/k/a Reginal Wayne Miller, All Nations Cathedral Church f/k/a Cathedral Baptist Church of the Grand Strand, Inc. and Cathedral Hall Academy f/k/a Grand Strand Academy and for a hearing to determine and establish the amount of damages to which Plaintiff is entitled.

Defendant Reginald Wayne Miller a/k/a Reginal Wayne Miller, was personally served with the Summons and Complaint on April 10, 2025, by a duly authorized process server. Service was effected both upon him individually and in his capacity as a representative of Defendants All Nations Cathedral Church f/k/a Cathedral Baptist Church of the Grand Strand, Inc. and Cathedral Hall Academy f/k/a Grand Strand Academy. Plaintiff's counsel has not been contacted by any retained counsel to answer the complaint or to obtain an extension for the complaint on behalf of Defendants Reginald Wayne Miller a/k/a Reginal Wayne Miller, All Nations Cathedral Church f/k/a Cathedral Baptist Church of the Grand Strand, Inc. and Cathedral Hall Academy f/k/a Grand

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Strand Academy. This motion is made and based upon the Affidavit of Default filed herewith demonstrating that good and valid service was obtained upon the said Defendants. More than thirty (30) days has passed and no Answer, Motion or other responsive pleading has been entered by said Defendants Reginald Wayne Miller a/ka Reginal Wayne Miller, All Nations Cathedral Church f/k/a Cathedral Baptist Church of the Grand Strand, Inc. and Cathedral Hall Academy f/k/a Grand Strand Academy.

**MCGOWAN, HOOD, FELDER &
PHILLIPS, LLC**

s/S. Randall Hood

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Rock Hill, South Carolina
May 28, 2025

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