

EXHIBIT A

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
)
COUNTY OF HAMPTON) CIVIL ACTION NO.: 2021CP25____
)
Randolph Murdaugh, IV,)
)
Plaintiff,)
)
v.) **SUMMONS**
) (Non-Jury Action Requested)
)
Richard Alexander Murdaugh,)
)
Defendant.)

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at P.O. Box 457, Hampton, SC 29924, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

s/Randolph Murdaugh, IV
BY: _____
Randolph Murdaugh, IV (SC Bar #64305)
P.O. Box 457
Hampton, SC 29924
(803) 943-2111

October 28, 2021

Hampton, South Carolina

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF HAMPTON) CIVIL ACTION NO.: 2021CP25_____

Randolph Murdaugh, IV,)

Plaintiff,)

v.)

Richard Alexander Murdaugh,)

Defendant.)

COMPLAINT

(Non-Jury Action Requested)

The Plaintiff alleges:

1. That Plaintiff is a citizen and resident of Hampton County, South Carolina.

2. That Defendant is a resident of the state of South Carolina.

3. In the days prior to September 2, 2021, Defendant represented to Randolph Murdaugh, IV that he needed a loan to cover an overdrawn bank account and that Defendant had already written other checks including checks to workers which will make the account more overdrawn. Defendant did not disclose that he was in poor financial condition.

4. Defendant requested that Plaintiff loan Defendant Seventy-Five Thousand and 00/100 (\$75,000.00) Dollars and requested that Randolph Murdaugh, IV deposit it into Defendant's Palmetto State checking account and Randolph Murdaugh, IV agreed and deposited the Seventy-Five Thousand and 00/100 (\$75,000.00) Dollars into Defendant's Palmetto State checking account. It was Plaintiff's belief that Defendant would repay the \$75,000 loan within thirty (30) days and Defendant has not repaid that loan.

5. That later Randolph Murdaugh, IV transported Defendant to a rehabilitation facility for treatment for drug addiction. In order to get Defendant's treatment, Defendant requested that Randolph Murdaugh, IV pay for the initial treatment in the amount of Fifteen Thousand and 00/100 (\$15,000.00)

Dollars and Randolph Murdaugh, IV wrote a check to the facility so that Defendant could get his treatment, and Randolph Murdaugh, IV has not been reimbursed by the Defendant for this money.

6. Richard Alexander Murdaugh, Jr. began selling assets of Defendant and applying the proceeds to known debts of Defendant. Upon information and belief these debts are at Palmetto State Bank and at the rehabilitation facility that was treating Defendant for his drug addiction. One asset Richard Alexander Murdaugh, Jr. was attempting to sell was a Kubota tractor and another was a rotary cutter. After receiving offers from uninterested potential buyers of these items, Richard Alexander Murdaugh, Jr. offered these items for sale to Randolph Murdaugh, IV for the same price, in exchange for cancellation of debt by Randolph Murdaugh, IV. Randolph Murdaugh, IV purchased these items in exchange for cancellation of Forty-Three Thousand Five Hundred and 00/100 (\$43,500.00) Dollars in debt.

7. Of the total loan of Ninety Thousand and 00/100 (\$90,000.00) Dollars, there remains Forty-Six Thousand Five Hundred and 00/100 (\$46,500.00) Dollars unpaid (after cancellation of \$43,500.00 for the tractor and rotary cutter).

8. Defendant is in default on the loans in the amount of Forty-Six Thousand Five Hundred and 00/100 (\$46,500.00) Dollars.

WHEREFORE, Randolph Murdaugh, IV request the court to give credit for the sale of the above equipment and thereafter order judgment against Defendant in the amount of Forty-Six Thousand Five Hundred and 00/100 (\$46,500.00) Dollars.

s/Randolph Murdaugh, IV

BY: _____

Randolph Murdaugh, IV (SC Bar#64305)

P.O. Box 457

Hampton, SC 29924

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October 28, 2021