

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
 )  
 COUNTY OF HORRY ) FIFTEENTH JUDICIAL CIRCUIT  
 )  
 )  
 Harold "HG" Gene Worley, Jr., ) C/A No. 2019-CP-26-  
 )  
 ) Plaintiff, )  
 )  
 vs. )  
 )  
 Meredith Carter Bauer, )  
 )  
 ) Defendant. )

**SUMMONS**  
(Jury Trial Demanded)

TO: THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the Plaintiff's attorney, Thomas C. Brittain, at The Brittain Law Firm, P.A., 4614 Oleander Drive, Myrtle Beach, South Carolina 29577, within thirty (30) days after the service hereof, exclusive of the date of such service and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

Dated at Myrtle Beach, South Carolina, on the 3<sup>rd</sup> day of September 2019.

**THE BRITTAIN LAW FIRM, P.A.**

                  s/Thomas C. Brittain                    
 Thomas C. Brittain, Esq.  
 SC Bar #893  
 4614 Oleander Drive  
 Myrtle Beach, SC 29577  
 (843) 449.8562  
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 ) Plaintiff, )  
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**COMPLAINT**  
(Jury Trial Demanded)

NOW COMES the Plaintiff, by and through his undersigned attorney, Thomas C. Brittain, hereby complaining of the Defendant, would allege and show unto this Court as follows:

**PARTIES AND JURISDICTION**

1. That Plaintiff Harold “HG” Gene Worley (hereinafter “Plaintiff”) at all times relevant herein was a private citizen and resident of the State of South Carolina, County of Horry.
2. That Defendant Meredith Carter Worley (hereinafter “Defendant”) at all times relevant herein was a private citizen and resident of the State of South Carolina, County of Horry.
3. That, upon information and belief, all pertinent and relevant acts that resulted in this action occurred in Horry County, South Carolina.
4. Jurisdiction and venue are proper and appropriate in this Horry County Court of Common Pleas.

**FACTS**

5. That Plaintiff and Defendant began dating in 2000, married thereafter on June 12, 2004, and their three children were born of the marriage.
6. That in and around 2016 the marriage had soured – the parties argued a lot of the time to the extent that the Defendant would isolate himself from the Plaintiff to minimize the

conflict in the home. However, throughout this time, the Defendant spent time with his children playing with them and caring for their every need as he had always done.

7. That the parties had irreconcilable differences that led to a filing for divorce.

8. That on or about August 24, 2016, the Defendant moved out of the marital residence with the three children.

9. That on or about September 5, 2016, North Myrtle Beach Police served Plaintiff with an arrest warrant for criminal sexual conduct with a minor or attempt-first degree; he was released on a personal recognizance bond later that day.

10. That prior to his arrest Plaintiff had never been accused of mistreating his children in any way by his wife, his children, other family members, friends, acquaintances, etc.

11. That, on the date of his arrest, Plaintiff was rushed to the hospital with chest pains caused by stress and anxiety surrounding the false accusations and his arrest.

12. That, upon information and belief, the criminal charges against Defendant were a result of false and misleading statements along with a fabricated photograph produced by Defendant, a sinister and illegal act.

13. That, upon information and belief, the Defendant alleged that the Plaintiff committed unlawful conduct towards their minor child in an effort to gain leverage regarding child custody in the divorce proceeding.

14. That the Defendant's actions were part and parcel of a scheme of parental alienation, fraud, abuse of process, slander and malicious prosecution, all to the benefit of the Defendant and to the detriment of the Plaintiff as well as to the detriment of their three children.

15. That the Defendant gave a Voluntary Statement to North Myrtle Beach Police, dated September 2, 2016, that states in part: "I was scared that if I left the house completely HG

would stop monetary support and try to take the children away from me” and admitted to others that she knew he was not a pedophile and had not harmed the boys.

16. Upon information and belief, the Defendant had malicious reasons to institute, procure, and participate in a scheme to gain leverage in their marital litigation and specifically regarding child custody.

17. That the Defendant’s efforts were thwarted by the truth of the matter.

18. That the testimony of Plaintiff’s and Defendant’s twin sons during the criminal trial was clearly coached.

19. That on or about April 11, 2019 the Plaintiff was found not guilty by a jury of his peers on all charges.

20. That the Defendant acted maliciously for an ulterior purpose in an effort to defame the Plaintiff and gain full custody of their minor children.

**AS A FIRST CAUSE OF ACTION**  
(Abuse of Process)

21. That Plaintiff repeats and reiterates the above-stated allegations as if set forth herein verbatim.

22. That the Defendant acted with ill intent for an ulterior purpose – parental alienation.

23. That the Defendant’s scheme was a willful act in the abuse of process that is not proper in the regular conduct of the proceeding and, further, even after Plaintiff’s acquittal of all charges the Defendant and her lawyers continued in the abuse of process by forcing domestic court proceedings in spite of the jury verdict.

24. That Defendant’s conduct constituted a definite act including but not limited to threats that are not authorized by the process and were aimed at an object not legitimate in the use of the process – parental alienation and the Defendant’s rights under the law.

25. That the Defendant's improper motive – gaining child custody and harming the Plaintiff's reputation and character – was not properly involved in the proceedings.

26. That the Defendant used a criminal proceeding for an end not lawfully warranted by it that has caused irreparable harm to the Plaintiff and his family.

**AS A SECOND CAUSE OF ACTION**  
(Malicious Prosecution)

27. That Plaintiff repeats and reiterates the above-stated allegations as if set forth herein verbatim.

28. That the Defendant instituted, procured, and participated in a criminal proceeding against the Plaintiff in an effort to destroy the Plaintiff's opportunity to be a father to his children and maintain his reputation in the community among other irreparable harms and damages.

29. That the Defendant acted with malice and without probable cause.

30. That the criminal proceedings instituted, procured, and participated in by the Defendant's allegations resulted in favor of the Plaintiff.

**AS A THIRD CAUSE OF ACTION**  
(Defamation/Libel Per Se)

31. That Plaintiff repeats and reiterates the above-stated allegations as if set forth herein verbatim.

32. That Defendant's allegations were malicious, unfounded, and employed for an ulterior purpose in an effort to disparage and harm the Defendant.

33. That the Defendant's actions were in violation of the Plaintiff's right to enjoy his good reputation, unimpaired by false and defamatory attacks, accusations, and narrative.

34. That the Defendant's allegations were published to the community through her own means as well as police reports, warrants, and records of the martial litigation.

35. That the Defendant's actions and narrative were defamatory per se in an effort to degrade the Plaintiff and his character and reputation in the estimation of his friends, family acquaintances, and the public.

36. That the Defendant's actions and narrative were intended to disgrace the Plaintiff and to render him unfit to be a father to his children.

37. That the Defendant acted with calculated ill will with the conscious indifference towards the Plaintiff's rights.

38. As a direct and proximate result of the Defendant's actions, combining and concurring, the Plaintiff has suffered economic and material losses as a result of the defamation.

**AS A FORTH CAUSE OF ACTION**  
(Intentional Infliction of Mental/Emotional Distress)

39. That Plaintiff repeats and reiterates the above-stated allegations as if set forth herein verbatim.

40. As a direct and proximate result of the Defendant's actions, the Plaintiff has suffered emotional distress, humiliation, mental anguish, pain and suffering.

41. The Defendant has willfully and intentionally violated the law by abusing the legal process all in acts against the Plaintiff.

42. As a direct and proximate result of the Defendants' intentional misconduct of false and misleading information and statements, the Defendant created a false impression of the Plaintiff for the primary purpose of gaining custody of the children in addition to encouraging third parties to injure, humiliate, or retaliate the Plaintiff, his family, his business, reputation and the like, when she knew such claims were false.

43. The intentional violations of the law are evidence of the Defendant's willfulness to cause distress to the Plaintiff, the minor children, the Worley family, and many others.

44. The Defendant's conduct, combining and concurring, were so extreme and outrageous as to exceed all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized society; no other act could be as sinister as to knowingly coach children to lie about their father as to sexual misconduct.

45. The Defendant's actions have caused economic injury to the Plaintiff and caused his person, his family, business associates, and others undue harm.

46. The Defendant's abuse of process to stir up hostility directed to the Plaintiff is so severe that no reasonable person could be expected to endure it.

47. The Plaintiff is entitled to a trial by jury, and for damages against the Defendant, jointly and severely, for both actual and punitive damages in an amount to be calculated by the trier of the facts.

**WHEREFORE**, Plaintiff, having complained of the Defendant, prays to this Honorable Court that Plaintiff be awarded all actual, consequential and special damages as described herein as well as punitive damages and any further relief this Court deems just and proper.

**THE BRITTAIN LAW FIRM, P.A.**

s/Thomas C. Brittain  
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Myrtle Beach, South Carolina  
September 3, 2019.