

STATE OF SOUTH CAROLINA
COUNTY OF HAMPTON

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT

Renee S. Beach, as Personal Representative
of the Estate of Mallory Beach,

C/A#: 2019-CP-25-00111

Plaintiff,

vs.

**MOTION TO COMPEL SUBPOENA
RESPONSE FROM MARTIN'S FUNERAL
HOME**

Gregory M. Parker, Inc. d/b/a Parker's
Corporation, Richard Alexander Murdaugh,
Richard Alexander Murdaugh, Jr., John
Marvin Murdaugh, as PR of the Estate of
Margaret Kennedy Branstetter Murdaugh,
and Randolph Murdaugh, IV, as PR of the
Estate of Paul Terry Murdaugh,

Defendants.

Co-Receivers John T. Lay, Jr. and Peter M. McCoy, Jr. ("Co-Receivers") hereby give notice of their intent to move, and does so move, for an Order of this Court compelling a response to the subpoena *duces tecum* served on John Martin of Martin's Funeral Home ("Martin's").

In reviewing the banking records for Richard Alexander Murdaugh, Sr. ("Alex"), the Co-Receivers discovered a series of wires, communications, and transactions whereby Alex appeared to personally fund the purchase by John Martin, owner of Martin's Funeral Home in Estill, South Carolina, of a number of assets including real property owned by Hall Jones & Brown Funeral Home located in Brunswick, Georgia. The information discovered includes

wiring instructions to Southeastern Bank in the amount of \$110,253.76 on January 14, 2020 from Alex's personal checking account. See documents attached as **Exhibit A**.¹

A cursory review of Alex's financial records does not indicate that John Martin has repaid Alex for the purchase that occurred in January 2020 although it is clear that John Martin operates a funeral home both in Estill and Brunswick, Georgia. The website for Martin's Funeral home (martinsfuneralhomellc.com) specifically lists a Brunswick location at the property listed in the wire instructions: 2005 G Street Brunswick, GA 31520.

Attached hereto as **Exhibit B** is a copy of the subpoena sent to Martins that was served on January 27, 2022. Attached hereto as **Exhibit C** is a copy of the signed certified green card proving service. Attached hereto as **Exhibit D** is a copy of the reminder letter sent to Martin's on March 18, 2022. As of the date of this motion, Co-Receivers have not received a response from Martin's or anyone on behalf of Martin's.

Co-Receivers hereby respectfully request that this Court issue its Order compelling Martin to respond to the subpoena. Co-Receivers' counsel certifies that they have attempted in good faith to resolve the matter contained in this Motion.

[Signature to Follow]

¹ It appears that the initial wire was in the amount of \$147,000, but that this amount was returned by Southeastern Bank. A few days later the amount of \$110,253.76 was wired from Alex's personal checking account after specific instruction from Southeastern Bank.

**CO-RECEIVERS JOHN T. LAY, JR. AND
PETER M. McCOY, JR.**

s/Amy L.B. Hill

Amy L.B. Hill, SC Bar No. 68541

Jordan M. Crapps, SC Bar No. 100580

Gallivan, White & Boyd, P.A.

P.O. Box 7368

Columbia, SC 29202-7368

ahill@gwblawfirm.com

jcrapps@gwblawfirm.com

(803) 779-1833 Ofc

April 26, 2022

Counsel for Co-Receivers