

STATE OF SOUTH CAROLINA

COUNTY OF HAMPTON

RENEE S. BEACH, as Personal Representative
of the Estate of MALLORY BEACH,

Plaintiff,

vs.

GREGORY M. PARKER, INC. d/b/a
PARKER'S CORPORATION, RICHARD
ALEXANDER MURDAUGH, and
RANDOLPH MURDAUGH, IV, as P.R. of the
Estate of PAUL TERRY MURDAUGH,

Defendants.

IN THE COURT OF COMMON PLEAS

FOURTEENTH JUDICIAL CIRCUIT

Case No. 2019-CP-25-00111

**RICHARD ALEXANDER MURDAUGH,
JR.'S MOTION FOR A PROTECTIVE
ORDER AND MOTION TO QUASH
RECORDS SUBPOENA**

PLEASE TAKE NOTICE that Richard Alexander Murdaugh, Jr. ("Buster Murdaugh") by and through his undersigned attorneys, hereby moves this Honorable Court for a Protective Order and Order Quashing the records subpoena issued to Richard A. Murdaugh, Jr. a/k/a Buster Murdaugh, attached as Exhibit A¹ pursuant to the South Carolina Rules of Civil Procedures 26 and 45. The basis for this Motion is that the subpoena seeks information that is irrelevant to the claims in the above-captioned case, overly broad, beyond the scope of discovery, and seeks confidential and private information from a non-party.

This Motion is supported by the South Carolina Rules of Civil Procedure, applicable case law, oral arguments, and any memoranda or affidavits submitted in support of this Motion, and any other such materials the court may receive at or prior to the time of the hearing on this Motion.

Pursuant to Rule 11, SCRCP, the undersigned affirms that prior to filing this Motion, she communicated with opposing counsel and has attempted in good faith to resolve the matter contained herein, but that no resolution could be had.

[SIGNATURE PAGE TO FOLLOW]

¹ Exhibit A is a copy received from Plaintiff's Counsel with personal information redacted.

HAYNSWORTH SINKLER BOYD, P.A.

By: *s/E. Elliot Condon*

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October 6, 2023

Charleston, South Carolina