

STATE OF SOUTH CAROLINA COUNTY OF LEXINGTON	IN THE COURT OF COMMON PLEAS ELEVENTH JUDICIAL CIRCUIT
Joanie Newhouse, Plaintiff, vs. Ryan Lindler, Sr. and Ryan Lindler, Jr. Defendant(s).	CIVIL ACTION NO.: 2026-CP-32-____ SUMMONS (JURY TRIAL DEMANDED)

TO: RYAN LINDLER, SR. AND RYAN LINDLER, JR; DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to answer the Complaint, a copy of which is now served to you, and to serve a copy of your Answer to this Complaint to the subscriber, Lori S. Murray, Esquire, at her office via P.O. Box 2332, Columbia, SC 29202, within THIRTY (30) days after service, excluding the day of service. If you fail to Answer the Complaint within that time, judgment by default will be rendered against you for the relief demanded in the Complaint.

s/Lori S. Murray
Lori S. Murray, Esquire
SC Bar No. 11324
2016 Lincoln Street (29201)
P.O. Box 2332
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ATTORNEY FOR PLAINTIFF

Columbia, South Carolina

Dated this 25th day of August 2026

STATE OF SOUTH CAROLINA COUNTY OF LEXINGTON	IN THE COURT OF COMMON PLEAS ELEVENTH JUDICIAL CIRCUIT
Joanie Newhouse, Plaintiff, vs. Ryan Lindler, Sr. and Ryan Lindler, Jr. Defendant(s).	CIVIL ACTION NO.: 2026-CP-32-____ COMPLAINT (JURY TRIAL DEMANDED)

TO: RYAN LINDLER, SR. AND RYAN LINDLER, JR; DEFENDANTS:

Comes now the Plaintiff, Joanie Newhouse, by and through her attorney Lori S. Murray, complaining of the Defendants Ryan Lindler, Sr. and Ryan Lindler, Jr. alleging the following:

PARTIES AND JURISDICTION

1. The Plaintiff Joanie Newhouse, at all times relevant to this Complaint, was a citizen and resident of the County of Lexington, State of South Carolina.
2. Upon information and belief, Defendant Ryan Lindler, Sr., ("Lindler, Sr.") at all times relevant to this Complaint, was a citizen and resident of the County Lexington, State of South Carolina.
3. Upon information and belief, Defendant Ryan Lindler, Jr. ("Lindler, Jr."), at all times relevant to this Complaint, was a citizen and resident of the County Lexington, State of South Carolina.
4. Venue is proper as the substantial acts and occurrences giving rise to this Complaint occurred.

FACTUAL ALLEGATIONS

5. This action arises out of the December 6, 2023, murder of Kevin Lester Newhouse ("Kevin"), son of Plaintiff Joanie Newhouse. On that date, Kevin Newhouse was shot four times in the back by Defendant Ryan Lindler, Jr. at the direction of Ryan Lindler, Sr. This ruthless and senseless murder occurred in the presence of his mother, Plaintiff Joanie Newhouse.
6. On December 6, 2023, Kevin, son of Plaintiff Joanie Newhouse, was walking down his street carrying a machete he used to cut brush. At some point, Kevin did come across and enter property owned by the Defendants.
7. Upon information and belief, Defendant Lindler Sr. saw Kevin on his property through his surveillance camera and raced to the scene to confront Kevin.
8. Upon information and belief, Defendant Lindler Sr. confronted Kevin on his property and an altercation took place during which time Kevin was disarmed.
9. Defendant Lindler Sr. then marched Kevin back down to his own residence using a stick or cattle prod to forcefully direct his movements by hitting him on the front or back of his legs. When he reached Kevin's house, he knocked on the door which was answered by Kevin's mother, Plaintiff Joanie Newhouse.
10. Lindler Sr. asked to speak to Plaintiff's husband, but he was not home. Lindler Sr. then explained to Plaintiff that Kevin was trespassing on his property. Plaintiff advised Lindler Sr. to leave her property and informed him that he was now the one trespassing.
11. The conversation spilled out into the front yard of Plaintiff's home with her continuing to inform Lindler Sr. he was trespassing and asking him to leave her property.

12. Kevin Newhouse attempted to escape the conflict and enter his home multiple times but was prohibited from doing so by Lindler's Sr. and his cattle prod.
13. Defendant Lindler Sr. continued to prevent Kevin from entering his home, so Kevin attempted to walk around to the back yard and enter through the back door. Plaintiff followed them to the backyard continuing to ask Defendant Lindler, Sr., to leave her son alone and exit her property.
14. Defendant Lindler, Sr. did not leave her son alone. Defendant Lindler, Sr. did not leave her property. Instead, a physical altercation broke out between Defendant Lindler, Sr. and Kevin where in Defendant Lindler, Sr. placed Kevin in a choke-hold from behind.
15. Upon information and belief, Defendant Lindler, Sr., at some point called his son Defendant Linder, Jr. and told him to come to the scene.
16. Defendant Lindler, Jr. managed to find his father in Plaintiff's back yard and arrived on the property carrying a loaded weapon.
17. Upon seeing his son, Defendant Lindler, Sr. threw Kevin on the ground and yelled "Shoot him" to his son Defendant Lindler, Jr.
18. Defendant Lindler, Jr. then shot Kevin Newhouse four times in his back directly in front of his mother, Plaintiff Newhouse.
19. When Lexington County officers arrived on scene, Defendants Lindler Sr. and Lindler Jr. told officers Kevin was armed with the machete and that Kevin's dogs had bitten them. Neither of these statements are true. Kevin was unarmed and the dogs were chained up.
20. To the extent Defendant Lindler, Sr. did not directly fire the fatal shot(s), he did knowingly give substantial assistance and encouragement to Defendant Lindler,

Jr. and/or acted pursuant to a common plan or design to commit the tortious conduct described herein.

**INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS CAUSE OF ACTION**

21. The allegations of Paragraphs 1 through 20 are incorporated herein as if repeated verbatim.
22. The Defendants did act in concert and/or aided and abetted each other in the murder of Kevin Newhouse.
23. Defendants engaged in extreme and outrageous conduct by intentionally shooting and killing Kevin in his mother's presence.
24. Defendants did intend to cause or act with reckless disregard of the probability of causing severe emotional distress to Plaintiff Joanie Newhouse who was mere feet away and witnessed her son's murder.
25. The murder of Kevin Newhouse in front of the Plaintiff was so extreme and outrageous that it exceeds all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized community.
26. As a direct and proximate result of Defendants' actions, the Plaintiff has suffered severe emotional distress, anxiety, post trauma stress disorder and depression.
27. The emotional distress suffered by the Plaintiff was so severe that no reasonable person could be expected to endure it.

WHEREFORE, Plaintiff prays for judgement against the Defendants for actual damages and punitive damages in an amount to be determined by the tryer of fact,

for the costs associated with this action, including attorney's fees, and for such relief as this Court may deem just and proper.

s/Lori S. Murray .
Lori S. Murray, Esq.
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P.O. Box 2332
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(803) 779-4472
ATTORNEY FOR PLAINTIFF

Columbia, South Carolina
August 25, 2026