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Feb 27 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

) IN THE COMMON PLEAS COURT
) 14th Judicial Circuit
) CIVIL ACTION NO. 08-CP-07-1636

CAROLYN RITTER, PERSONAL
REPRESENTATIVE OF THE ESTATE OF
BEVERLY COLLIER GAY AKA BEVERLY
A. GAY

Plaintiff,

-vs-

MOSES MOUZONE AND CECELIA
MOUZONE
Defendants.

PERMANENT RESTRAINING
ORDER FREEZING ASSETS AND
REQUIRING THE RETURN OF
ASSETS TO THE PLAINTIFF

2008 JUL 23 PM 9:40
ELIZABETH M. SMITH
BEAUFORT COUNTY, S.C.
CLERK OF COURT

THIS MATTER CAME BEFORE ME BY, an Emergency Motion for Restraining
Order to Freeze the Assets of the Defendants filed on July 9, 2008. A hearing was scheduled for
July 23, 2008. Defendants requested an expedited hearing which was convened on July 16,
2008. Present at the hearing was the Plaintiff, Carolyn Ritter and her counsel Alysoun Eversole
and Gregory Galvin, the Defendants, Moses and Cecelia Mouzone and their counsel Hugh Davis.
Also present were two potential witnesses for the Plaintiff, Manuel Jenkins and Karen Polite.

After introductory comments and the presentation of evidentiary documents to the Court
by Plaintiff's counsel, the parties agreed to the following Restraining Order Freezing Assets and
relinquishment of certain assets of the Defendants and other relief as follows until the time of
trial in this case.

1. Within 10 days of the date of this Order the Defendants, Moses & Cecelia
Mouzone will disclose, in writing, a list of each and every bank account,
investment account, certificate of deposit, money market account, or stock or

other financial account, the name of the institution and the account number in the Defendant's possession or control from September 28, 2005 to date, including accounts which may have been closed. Defendants shall affirm in the presence of a notary that the list is a complete list of all financial accounts in their possession or control from September 28, 2005 to date.

2. Within 30 days of the date of this Order, Moses Mouzone shall provide a full, accurate and complete accounting of his expenditures and exercising of authority over the assets of Beverly Gay from the date of the execution of the Power of Attorney to date.
3. The Defendants shall immediately deliver to the Plaintiff possession of the following by and through Plaintiff's Attorney, Eversole Law Firm, PC 1509 King Street, Beaufort, SC:
 - a. 2007 Toyota Camry (VIN JTNBE46K373085060), the keys and the title;
 - b. 2004 Cadillac Deville (VIN 1G6KD54Y04U245196) the keys and the title; and
 - c. 1997 Club Car Golf Cart purchased on 11/13/06 for \$4,221.00 from Surcliffe Golf Carts the keys and the title.
4. Plaintiff shall store these vehicles in a safe location pending further Court Order. The Defendants shall deliver to Plaintiff the titles to the Toyota Tundra (VIN 5TBRC3810YS026631), Mazda Tribute (VIN 4F2YU08121KM19929) and Toyota Sequoia (VIN STDZT34A04S233043) which the Plaintiff shall hold in trust pending resolution of this case or further Court Order. Defendants may

continue to use these vehicles and shall further provide to Plaintiff proof of insurance for these vehicles.

5. Within 24 hours of the date of this Order, Defendants shall provide to the Plaintiff the VIN Number of the covered trailer which is in the Defendant's possession.

IT IS FURTHER ORDERED, the Defendants, Moses Mouzone and Cecelia Mouzone are restrained from transferring, disposing of, selling, or encumbering any real or personal property, or any investment accounts, stocks, certificates of deposit, money market accounts, or any other personal property, funds or assets until further Order of this Court.

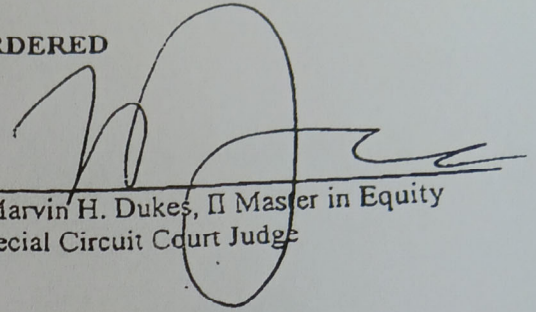
IT IS FURTHER ORDERED, that all bank accounts or other financial accounts owned by or controlled by Moses Mouzone and/or Cecelia Mouzone are hereby frozen. The Defendants, Moses Mouzone and Cecelia Mouzone are hereby prohibited from withdrawing funds or changing in any manner whatsoever, any of their financial accounts with the following two exceptions. Ms. Mouzone receives \$689.00 per month from Social Security that is deposited directly into South Carolina Bank and Trust Account Number *****3970 and Ms. Mouzone receives \$1044.00 per month from Social Security Disability which is deposited directly into her MCAS Account Number *****8020. Defendants may withdraw from the aforementioned accounts up to the amount of the stated benefit amounts. All remaining monies or deposits into the accounts shall remain frozen until further Order of this Court.

IT IS FURTHER ORDERED, that the Plaintiff may petition this Court for the freezing of additional assets, even those not specifically named in this order.

IT IS FURTHER ORDERED, that either party is entitled to an expedited hearing on the matter by request.

IT IS FURTHER ORDERED that nothing herein shall be considered precedent for the balance of the case.

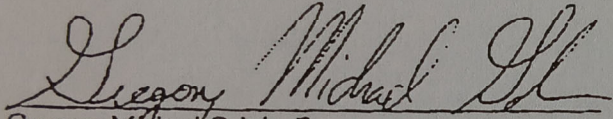
SO ORDERED



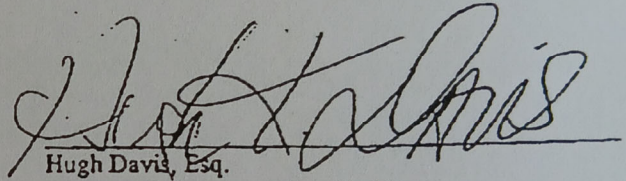
Judge Marvin H. Dukes, II Master in Equity
And Special Circuit Court Judge

Beaufort, South Carolina
23 day of July, 2008

AGREED:



Gregory Michael Galvin, Esq.
Eversole Law Firm, PC
Attorney for Carolyn Ritter,
the Personal Representative of Beverly Gay



Hugh Davis, Esq.
Attorney for Moses & Cecelia Mouzone