

encumbering, liquidating, wasting, spending, converting, dissipating, or otherwise disposing of the mobile homes identified as:

1. A 2022 SMSP (make) PRIME (model) mobile home (with Vin: ALS23834AB) and
2. A 2022 SUNS (make) PR1328 (model) mobile home (with VIN: ALS23833AB)
3. With further respect to these mobile homes, it is Ordered that the registered/titled owner of said mobile homes shall be responsible during the pendency of this action to obtain and/or maintain adequate property insurance coverage of said mobile homes and provide through their counsel a Certificate of Insurance thereon within one month of this Order. If Defendants are un able to obtain insurance coverage, then Defendants shall be solely liable for any damages to the property. This Court finds that although rent payment may be relevant in this action, a ruling on rental value and its payment is not ripe for determination at this time. However, Plaintiff shall be granted protection of her interest in her solely owned real property that consists of 100 acres in Loris South Carolina as well as her right to exclusive control thereof during the pendency of this action except for a fifty-yard radius around the homes in which Defendants reside and their driveways directly to their residences from the paved public roadway.

THEREFORE, IT IS ORDERED that DEFENDANTS ARE ENJOINED from and shall not interfere in Plaintiff's exclusive use and control of her real property. For further clarity, all Plaintiff real property (land) that is outside of the fifty yards surrounding the mobile homes in which Defendants reside shall be exclusively controlled by the Plaintiff; and Defendants are enjoined from any interference with Plaintiff's and/or Plaintiff's agents' entry, control, moving, removing, cleaning, maintaining, modifying, and any other use, control, or enjoyment of said real property. Further, if Defendants claim any right, title and interest to any personal property outside

of the fifty-yard radius of the homes in which Defendants reside, they shall relocate it within one month of the signing of this order and/or refrain from interfering with Plaintiff and/or Plaintiff's agent(s) after the expiration of one months from the date of this order. If after one months from this order, Plaintiff or Plaintiff's agent choses to remove any unwanted items thereon, including but not limited to animal fences, hunting blinds, shed, lean-tos, chicken coops, trash, toys, signs, cameras, plants, sheds, recreational vehicles, etc., the Defendants and/or any agent of the Defendants shall be enjoined from interfering with Plaintiff's right to exclusive control of said land.

FURTHER DEFENDANTS ARE ENJOINED from removing or having a third party remove any signs that Plaintiff places on her land that provide "Notice" to anyone on her property. Said "Notice" signs may include but are not limited to: NO TRESPASSING, NO HUNTING, NO MUD BOGGING, NO RECREATIONAL ACTIVITY, NO OFF-ROAD VEHICLES, NO FISHING, NO KYAKING, NO ENTRY WITHOUT AUTHORIZATION OF FRANCES WILLETTS.

FURTHER, DEFENDANTS ARE RESTRAINED AND ENJOINED from digging, wasting, and/or removing any timber, minerals, dirt, and/or other tangible benefits from Plaintiff's real property without a written agreement and/or permission given by Plaintiff.

DEFENDANTS ARE FURTHER RESTRAINED AND ENJOINED from inviting and/or allowing any child in their custody and/or control and/or friend, relative, or other invitee from going anywhere on Plaintiff's real property that is not in the vicinity of the homes in which Defendants reside.

DEFENDANTS ARE FUTHER RESTRAINED AND ENJOINED from hiding, selling, damaging, encumbering, liquidating, wasting, dissipating, or otherwise disposing the properties

listed below that are the subject of Plaintiff's complaint (that includes Replevin, Constructive Fraud, Conversion of Bailee, and other cause of action) identified as follows:

- a. A Kubota lawnmower,
- b. A new SMSP (make) PRIME (model) 2022 mobile home (with VIN: ALS23834AB),
- c. A new 2022 SUNS (make) PR1328 (model) mobile home (with VIN: ALS23833AB),
- d. Furniture in the homes placed on the Plaintiff's land,
- e. All goats (except two goats paid for by Demi Brinson and their offspring)
- f. Plaintiff's silverware, pots and pans, recliners, towels, sheets,
- g. Drake, the Boykin Spaniel,
- h. Utility Trailer with serial number 16V1U1922M3069350,
- i. Upright freezer,
- j. Luggage (2 pieces)
- k. Guns, rifles, shotgun, ammunition
- l. Welder,
- m. Air Compressor
- n. Chickens
- o. Chicken coop
- p. Step Exercise equipment
- q. Business records including but not limited to the following:
 - i. Plaintiff's architectural plans
 - ii. Permits pulled in Plaintiff's name
 - iii. Documents related to the purchase of the homes and expenses related thereto
 - iv. Banking records
 - v. Finance records regarding loans
 - vi. Personal vital records
- r. Personal Dell Laptop computer,
- s. Jewelry and/or priceless heirlooms
- t. Flat Screen TVs
- u. Rolex watch
- v. Wedding Ring
- w. Livestock feeders

This Court makes no finding herein regarding the rightful ownership or the whereabouts of these listed properties but is placing an Order of Protection thereon and enjoining the Defendants from disposing, hiding, concealing their whereabouts, selling, and or delivering them to a third party other than the Plaintiff or Plaintiff's counsel.

I find that justice requires the above referenced protections of the Plaintiff's interests in the

real and personal properties listed above during the pendency of this action. I find that without protection, Plaintiff may suffer irreparable harm for which no remedy would be available.

THEREFORE, IT IS ORDERED THAT the above protections are granted, the Defendants are enjoined from the above referenced actions, that any violation of this Order would be subject to contempt powers of this Court, and persons found to have violated this order shall be subject to fines, incarceration or both.

Therefore, it is

ORDERED that the Plaintiff's, Motion for Protection and Injunction is hereby granted as set forth above.

AND IT IS SO ORDERED on this _____ day of October, 2024.

**Kristi Curtis, Presiding Judge
Fifteenth Circuit Court Judge**



Horry Common Pleas

Case Caption: Frances Hufham Willetts VS David Thomas Roberts Jr , defendant, et al
Case Number: 2023CP2606918
Type: Order/Temporary Injunction

So Ordered

s/ Kristi F. Curtis, Circuit Court Judge, No. 2762