EXHIBIT 1

STATE OF SOUTH CAROLINA COUNTY OF LEXINGTON Bruce and Joanne Loveless, Plaintiffs, vs. Cameron Hinckley, Kris Hinckley and Diana Hinckley, Defendants.	IN THE COURT OF COMMON PLEAS Case No. 2024-CP-32-05200 **ORDER**

This matter comes before the Court on the Motion to Compel and for Sanctions (the Motion) filed by Plaintiffs Bruce and Joanne Loveless. Based on the briefing submitted by the parties and argument presented during a hearing on October 28, 2025, and for the reasons set forth herein, the Court GRANTS the motion.

BACKGROUND AND PROCEDURAL HISTORY

Plaintiffs allege that on or about December 17, 2023, Defendant Cameron Hinckley ("Cameron") entered the Loveless's home and stabbed Bruce Loveless multiple times, severely injuring him. Plaintiffs filed this action on December 17, 2024, alleging claims against Cameron and his parents, Defendants Kris and Diana Hinckley ("Parent Defendants"). In brief summary, Plaintiffs allege that Cameron had a history of threatening, violent, and unlawful conduct; that this history was known to Parent Defendants; that Parent Defendants took Cameron into their South Carolina home to live under their supervision; and that the attack on Mr. Loveless was the result both of Cameron's conduct and of the Parent Defendants' failure to properly supervise and monitor Cameron.

DISCOVERY HISTORY

Plaintiffs' filings related to the Motion set forth the history of Plaintiffs' efforts to obtain

discovery materials and Parent Defendants' resistance to such discovery. As this history relevant to the relief ordered herein, the Court summarizes it here.

Third-party Subpoenas

Plaintiffs began their discovery efforts by serving subpoenas on California law-enforcement agencies and the Church of Jesus Christ of Latter-day Saints ("the Church"). The subpoenas to law-enforcement agencies sought communications and other documents related to arrests of Cameron in various incidents in California. Parent Defendants sent objection letters to each of the subpoenaed agencies.

The subpoena to the Church sought documents related to Cameron's stalking and harassment of a Church Bishop and his wife in California. Parent Defendants again sent an objection letter. They also took the additional step of filing a motion to quash and an amended motion to quash, asserting the subpoena violated Parent Defendants' religious freedom rights, intruded on the priest-penitent privilege, and was overbroad and vague.[1] The Court largely rejected Parent Defendants' arguments, denying the motion to quash except as to their tithing records. Parent Defendants moved for reconsideration of the Court's order, which was denied.

Motion to Stay

Shortly after the hearing on the motion to quash, Parent Defendants filed a motion to stay these proceedings pending resolution of the criminal charges pending against Cameron relating to the assault. Parent Defendants maintained that going forward with this action would place a "significant and unduly prejudicial" burden on them, including because "[p]roceeding with discovery will place [Parent] Defendants in the unenviable position of having to answer discovery

[1] In their motion and at the hearing, Parent Defendants complained that Plaintiffs served the subpoenas before engaging in any other discovery efforts. The Court is not aware of, nor have Parent Defendants provided, any rule or other authority requiring first-party discovery before third-party discovery.

questions that may interfere or damage the prosecution or defense of their son." After granting Parent Defendants' request for additional time to submit a memorandum in support of the requested stay, the Court denied the motion on August 29, 2025. Parent Defendants then moved for reconsideration, stating they were "not aware of the exact basis of the denial." The Court denied reconsideration, noting that a stay was not warranted merely because "the two cases … impact each other," which the Court noted "is not an unusual situation in our court system." Ultimately, the Court saw "little to no merit" in Parent Defendants' argument as to the relationship between the criminal and civil matters.

Plaintiffs' Discovery Requests/Parent Defendants' Responses

Plaintiffs served discovery requests—interrogatories, requests for production ("RFPs"), and requests for admission ("RFAs")—on Parent Defendants on July 21, 2025. On August 20, 2025—the day their responses were due—Parent Defendants filed a motion for a protective order, contending that (1) their motion to stay was still pending; (2) Cameron's motion to strike certain allegations of the complaint was set to be heard on August 25, 2025, and that motion "relate[d] directly to specific" discovery requests; and (3) Plaintiffs had propounded 21 requests for admission to Diana Hinckley, in excess of the maximum of 20. Notably, Parent Defendants did not consult with Plaintiffs prior to filing the motion for protective order. *See* Rule 11, SCRCP.

Also on August 20, Parent Defendants served responses to the RFAs (but not to the interrogatories or RFPs). Each Parent Defendant made substantially the same objection to each and every RFA:

> Defendant objects to this Request for the following reasons: 1) Defendant's motion to stay the present matter is still pending; 2) Defendant Cameron Hinckley's motion to strike allegations of Plaintiff's Complaint related to this Request is still pending; 3) Defendant's motion for a protective order is still pending; and 4) the Request seeks admission of evidence not reasonably calculated to

> lead to the discovery of admissible evidence pursuant to Rule 26(b) of the South Carolina Rules of Civil Procedure.

Each Parent Defendant also objected to the phrases "interactions," "mentally unstable and/or bellicose," "mental health condition," and "violent episode, like the incident," claiming they were overly broad, vague, or argumentative. Diana Hinckley additionally objected to the fact that Plaintiffs had posed 21 RFAs to her. *Cf.* Rule 36(c), SCRCP (limiting a party to 20 requests for admission per opposing party).

On September 9, 2025, following denial of Parent Defendants' motion for stay and Cameron's motion to strike, Plaintiffs' counsel met and conferred with counsel for Parent Defendants regarding the discovery requests. The following day, Plaintiffs asked Parent Defendants to respond to the requests by September 12, 2025. On September 12, Parent Defendants informed Plaintiffs that they had not been able to review the discovery requests.

Plaintiffs' Motion to Compel

Plaintiffs filed their motion to compel on September 16, 2025, seeking the following relief:

> • Order all the Requests for Admission issued to Defendant Kris Hinckley to be deemed admitted;
>
> • Order Requests 1-20 of the Requests for Admission issued to Defendant Diana Hinckley to be deemed admitted;
>
> • Order Defendant Parents to meaningfully engage in discovery, including by promptly providing complete and fulsome responses to Plaintiffs' Interrogatories and Requests for Production;
>
> • Order Parent Defendants to turn in all electronic devices within their home for data preservation and capture; and
>
> • Impose Sanctions against Parent Defendants, including the costs associated with this Motion, for their repeated frivolous delays in this litigation.

On October 26, 2025, Parent Defendants filed an affidavit of Kris Hinckley stating that from August 3 to September 11, 2025, Parent Defendants were in Idaho taking "full-time care" of

Kris Hinckley's mother in a hospice facility, and they were again in Idaho from October 2 to October 17 in connection with her death and funeral.[2] On October 27, 2025, Parent Defendants filed a memorandum in opposition to the motion to compel. The Court heard argument on October 28, 2025.

ANALYSIS

As our Supreme Court has stated, "discovery serves as an important tool in the truth-seeking function of our legal system." *Oncology & Hematology Assocs. of S.C., LLC v. S.C. Dep't of Health & Env't Control*, 387 S.C. 380, 388, 692 S.E.2d 920, 924 (2010). Moreover, "the scope of discovery is broad." *Id.* This truth-seeking function is preserved by Rule 37(a), SCRCP, which provides that when discovery responses are absent, inadequate, or evasive, a party may move for entry of an order compelling complete and fulsome responses to discovery requests.

Requests for Admission

"A party may serve upon any other party a written request for the admission … of the truth of any matters within the scope of Rule 26(b) set forth in the request that relate to statements or opinions of fact or of the application of law to fact[.]" Rule 36(a), SCRCP. "The purpose of Rule 36 is to allow parties to narrow the issues and determine which facts do not need to be proven because they are admitted." *Scott v. Greenville Housing Auth.*, 353 S.C. 639, 650, 579 S.E.2d 151, 157 (Ct. App. 2003). Under Rule 36(a), a "matter for which an admission is requested" is deemed admitted unless the receiving party timely serves "a written answer or objection." Further,

> [i]f objection is made, the reasons therefor shall be stated. The answer shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that a party qualify his

[2] While the Court has no objective basis to question the averments in Kris Hinckley's affidavit, it is somewhat surprising that the extenuating circumstances of his mother's terminal illness were not mentioned in Parent Defendants' motion for protective order, filed on August 20, 2025.

> answer or deny only a part of the matter of which an admission is requested, he shall specify so much of it as is true and qualify or deny the remainder.

Id.; *see also Scott*, 353 S.C. at 645, 579 S.E.2d at 154 (recognizing that a failure to respond to requests for admissions renders any matter listed in the request admitted for trial).[3] *cf.*

Here, Parent Defendants responded to Plaintiffs' RFAs by reciting a list of pending motions and, as to some RFAs, claiming without further explanation that certain terms were overly broad, vague, or argumentative. The Court agrees with Plaintiffs that these objections were insufficient to satisfy the requirements of Rule 36(a).

South Carolina courts have repeatedly held that boilerplate and non-specific objections and objections are tantamount to no objections at all.[4] *State Farm Fire & Cas. Co. v. Admiral Ins. Co.*, 225 F. Supp. 3d 474, 485 (D.S.C. 2016) ("Boilerplate, general objections standing alone waive any actual, specific objections."); *United States v. Town of Irmo*, No. 3:18-cv-03106-JMC, 2020 WL 1025686, at *5 (D.S.C. Mar. 3, 2020) ("'[A]n evasive or incomplete disclosure, answer, or response' to a discovery request is 'treated as a failure to disclose, answer, or respond.'" (quoting Fed. R. Civ. P. 37(a)(4)); *see also* The Honorable Roger M. Young, Sr., Memorandum,

[3] There is some authority for the proposition that a motion for protective order, filed timely and made in good faith, may "operate to prevent the matters from being admitted." *Baughman v. Am. Tel. & Tel. Co.*, 306 S.C. 101, 110, 410 S.E.2d 537, 542 (1991). Here, however, such motion was denied as Parent Defendants abandoned their motion for a protective order when they failed to appear at the October 15, 2025 hearing. *Cf. Taylor v. Taylor*, 747 S.W.2d 940, 945 (Tex. App. 1988) (holding that requests for admission were properly deemed admitted when responding parties moved for protective order but failed to request a hearing, "thereby waiving any contention that their motion for protective order … prevented the court from deeming admitted the matters requested to be admitted").

[4] Although the cited cases concern the federal version of Rule 36, "[t]he federal rule on requests for admissions is substantively similar to our rule." *Scott*, 353 S.C. at 649, 579 S.E.2d at 156.

Preparation for Discovery Motions (Circuit Ct., 9th Jud. Circuit, Aug. 29, 2019)[5] ("Objections that state that the discovery request is 'vague, overly broad, or unduly burdensome' are, standing alone, meaningless and will be found meritless by the Court." (emphasis omitted)).

Accordingly, all RFAs posed by Plaintiffs to Kris Hinckley are hereby deemed admitted, and RFAs 1-20 posed by Plaintiffs to Diana Hinckley are deemed admitted.

Parent Defendants' Other Discovery Responses

Having reviewed the materials submitted by the parties in connection with this Motion, the Court agrees with Plaintiffs that Parent Defendants' responses to Plaintiffs' interrogatories and RFPs were so inadequate and evasive as to constitute no responses at all. *See* Rule 37(a)(3) (providing that "an evasive or incomplete answer is to be treated as a failure to answer").

Plaintiffs' Motion provides the following as illustrative examples of deficiencies in Parent Defendants' discovery responses:

- In response to Plaintiffs' RFPs:
    - Parent Defendants produced nonresponsive documents and failed to produce responsive documents and communications;
    - Parent Defendants refused to produce documents and communications concerning their financial support of Cameron, which are relevant to Plaintiffs' contention that Parent Defendants had and/o assumed a duty to supervise and control Cameron's conduct;
- In response to Plaintiffs' interrogatories:[6]
    - Parent Defendants refused to answer certain interrogatories on the improper grounds that they "seek[] information that is more

[5] *Available at* https://lex-co.sc.gov/sites/lexco/files/Documents/Lexington%20County/Departments/master%20in%20equity/JudgeYoungMemo.pdf.

[6] Although this deficiency was not specifically identified by Plaintiffs, in reviewing the materials submitted in connection with the Motion the Court observed that neither Kris nor Diana verified their interrogatory answers. *See* Rule 33(a), SCRCP ("Each interrogatory shall be answered separately and fully in writing under oath …. The answers are to be signed by the person making them ….").

appropriately obtained through Defendant's deposition";

- Parent Defendants refused to provide information concerning their financial support for Cameron, which is relevant to Plaintiffs' contention that Parent Defendants had and/o assumed a duty to supervise and control Cameron's conduct;
- Parent Defendants provided contradictory answers to interrogatories. For example, Kris Hinckley answered Interrogatory No. 18 by denying knowledge that Cameron "had violent tendencies or had previously harmed or threatened to harm others," but answered Interrogatory No. 23 by describing an incident in which Kris Hinckley called law enforcement to the Hinckley residence because Cameron refused to put down a firearm and then fired it in the air; and
- Kris Hinckley refused to answer Interrogatory Nos. 14-16 on the grounds that "Defendant Cameron Hinckley did not reside with the [Parent] Defendants," when Parent Defendants produced documents (1) showing Cameron's address as 1051 Point View Road in Chapin, South Carolina, which is Parent Defendants' address, and (2) reflecting a statement by Diana Hinckley that "Cameron has recently moved back to the above address with them."

In addition to the foregoing, it also appears that there is concern regarding the preservation of evidence potentially stored on electronic devices in Parent Defendants' possession.

The Court agrees with Plaintiffs that Parent Defendants' discovery responses are deficient and that the motion to compel should be granted.

Motion for Sanctions / Award of Costs and Fees

Rule 37, SCRCP, provides that if a motion to compel is granted,

> the court shall, after opportunity for hearing, require the party or deponent whose conduct necessitated the motion or the party or attorney advising such conduct or both of them to pay to the moving party the reasonable expenses incurred in obtaining the order, including attorney's fees, unless the court finds that the opposition to the motion was substantially justified or that other circumstances make an award of expenses unjust.

Rule 37(a)(4), SCRCP; *see Ball v. Canadian Am. Exp. Co.*, 314 S.C. 272, 277, 442 S.E.2d 620, 623 (Ct. App. 1994) ("Under Rule 37(a)(4), SCRCP, the court shall require the payment of

reasonable expenses incurred in obtaining the order compelling discovery, including attorneys' fees.").

The Court declines to grant costs and fees at this time. As of this date, the Court does not have a fees and costs affidavit relative to sanctions. Accordingly, this request shall be held in abeyance until such affidavit is submitted.

CONCLUSION

For the reasons set forth above, the Court ORDERS that:

- All requests for admission issued to Kris Hinckley are deemed admitted;
- 1-20 of requests for admission to Diana Hinckley are deemed admitted;
- Parent Defendants shall engage in discovery with complete and full responses to discovery, including verifications of interrogatory answers, within 30 days of the filing date of this order;
- Parent Defendants shall turn in any and all electronic devices within their home and/or within their custody and control for data preservation and capture within 15 days of the filing date of this order; and
- Any affidavit of costs and fees incurred by Plaintiffs in seeking the relief afforded herein shall be filed and served within 30 days of the filing date of this order.

IT IS SO ORDERED.

Hon. George M. McFaddin, Jr.
S.C. Circuit Court Judge

Lexington Common Pleas

Case Caption: Bruce Loveless , plaintiff, et al VS Cameron Hinckley , defendant, et al

Case Number: 2024CP3205200

Type: Order/Compel

So Ordered

S/George M. McFaddin, Jr., #2759

EXHIBIT 2

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Lexington
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2024CP3205200

Bruce Loveless et al
PLAINTIFF(S)

Cameron Hinckley et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

☐ **JURY VERDICT**. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.

☑ **DECISION BY THE COURT**. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

☐ **ACTION DISMISSED** (*CHECK REASON*): ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other

☐ **ACTION STRICKEN** (*CHECK REASON*): ☐ Rule 40(j), SCRCP; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other

☐ **STAYED DUE TO BANKRUPTCY**

☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** *(CHECK APPLICABLE BOX)*: ☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☑ Statement of Judgment by the Court:

It is within the Court's discretion to issue a motion to reconsider ruling without a hearing. I do so and I decline to hold the hearing.

I respectfully decline to alter or amend the Order in question. And, I decline to extend any deadlines in the Order.

That a Court grants discovery does not mean it is, or will be, admissible in trial.

ORDER INFORMATION

This order ☐ ends ☑ does not end the case. ☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 02/13/2026 .

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

Lexington Common Pleas

Case Caption:	Bruce Loveless , plaintiff, et al VS Cameron Hinckley , defendant, et al
Case Number:	2024CP3205200
Type:	Order/Electronic Form 4

So Ordered

S/George M. McFaddin, Jr., #2759