

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable George M. McFaddin, Jr., Circuit Court Judge

Case No. 2024-CP-32-05200

RECEIVED

MAR 31 2026

SC Court of Appeals

Bruce and Joanne Loveless,..... Respondents,

v.

Cameron Hinckley, Kris Hinckley, and Diana Hinckley,..... Appellants

of whom Kris Hinckley and Diana Hinckley are the..... Appellants.

**APPELLANTS' MEMORANDUM OF LAW
REGARDING APPEALABILITY OF ORDERS**

Appellants Kris Hinckley and Diana Hinckley respectfully submit this response to the Court's letter dated March 16, 2026, which requested memoranda regarding the appealability of two (2) Orders dated January 29, 2026, and February 13, 2026. The first Order, dated January 29, 2026, granted the Motion to Compel against Ms. Hinckley, and deemed her initial responses to Respondents' Requests for Admission "admitted." The second, issued February 13, 2026, is a Form 4 Order denying reconsideration. Taken together, the Orders are appealable, as they affect a substantial right by, in practical effect, striking Ms. Hinckley's Answer and affirmative defense to Respondent's trespass claim, withdrawing it as a material issue from the case, foreclosing a determination on the merits, and precluding her from correcting the error.

FACTUAL AND PROCEDURAL BACKGROUND

This case arises from the events of December 17, 2023, when Appellants' adult son Cameron Hinckley ("Cameron"), stabbed Bruce Loveless inside his home. Mr. Loveless was a neighbor of Appellants.

Following the incident, Cameron was detained in Lexington County and charged with attempted murder, first-degree burglary, and possession of a weapon. On February 20, 2026, the Honorable Debra R. McCaslin, presiding over the Court of General Sessions for the County of Lexington, adjudged Cameron not guilty by reason of insanity and committed him to the Department of Mental Health. On December 17, 2024, Respondents Bruce and Joanne Loveless (the "Lovelesses" or the "Respondents") filed suit against Cameron Hinckley, Kris Hinckley, and Diana Hinckley. (A copy of the Respondents' Complaint is attached hereto as **Exhibit A**.) The Respondents' First Cause of Action for "Trespass against Defendants Cameron Hinckley and Diana Hinckley," outlined in paragraphs 80-85, provide as follows:

80. In the evening of December 17, 2023, Defendants Cameron and Diana both intentionally entered onto Plaintiffs' property without permission.
81. Defendants' actions to trespass onto Plaintiffs' property were intentional and affirmative acts...
83. Defendants' actions caused Plaintiffs' harm, which was a direct result of Defendants Cameron's and Diana's invasion.
84. Defendants Cameron and Diana's trespass on the Loveless Residence was willful, wanton, or in reckless disregard to Plaintiffs' rights.
85. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

Appellants answered on January 15, 2025, denying the allegations of paragraphs 80-85 of Respondents' Complaint. (Answer of Kris Hinckley and Diana Hinckley, attached hereto as **Exhibit B.**) (*Id.* ¶ 176.) Additionally, Appellants asserted the affirmative defense of license. On April 29, 2025, Appellants filed a Motion to Stay the proceedings. The motion was necessary because Cameron was an incompetent party in need of a Guardian ad litem (GAL) and the parallel prosecution of both matters, without a GAL in place, raised significant due process, constitutional, and privilege concerns. On May 8, 2025, the court ordered Cameron be provided with a GAL. On June 11, 2025, a GAL appeared on his behalf. The matter was stayed by the lower court for thirty days following the appointment of the GAL. On May 20, 2024, Cameron Hinckley was deemed incompetent and unable to stand trial in accordance with S.C. Code Ann. §44-23-410 and institutionalized by the Honorable Walton J. McLeod, IV.

I. Appellants' Responses to Respondents' Requests for Admission

On July 21, 2025, Respondents served their First Requests for Admission, First Sets of Interrogatories, and First Requests for Production of Documents on Appellants. On August 20, 2025, Appellants filed a Motion for a Protective Order. (A copy of the Respondents' Motion is attached hereto as **Exhibit C.**) That same day, Appellants timely answered Respondents Requests to Admit. (A copy of Appellants' initial answers is attached as **Exhibit D.**) Appellants' responses expressly referenced the pending Motion for a Protective Order, and consistent with *Baughman v. American Tel. and Tel. Co.*, explained "a motion for a protective order may be an appropriate response of a party upon whom a request for admissions is served." *Baughman v. American Tel. and Tel Co.*, SC 306 S.C. 101, 109, 410 S.E.2d 537, 542 (1991). They also raised proper objections to the requests, as all the parties had presented significant threshold issues to the Court and were awaiting its guidance. The Request for Admission in question here, which targets the core of

paragraphs 80-85 of Respondents' trespass claim against Ms. Hinckley, is stated as follows: "11. Admit that you were not invited into Plaintiffs' residence on December 17, 2023, by Plaintiff Bruce or Plaintiff Joanne." Appellant Ms. Hinckley responded, referring Respondents to the numerous pending motions, which included a Motion to Stay. As an aside, Ms. Hinckley was invited by text message from Joanne Loveless. (See text exchange between J. Loveless and D. Hinckley, dated December 17, 2023, attached hereto as **Exhibit E**.)

On September 16, 2025, Respondents filed a Motion to Compel against Appellants. (A copy of Respondents' Motion to Compel is attached as **Exhibit F**.) Respondents' Motion to Compel noted Appellants responded to the requests for admission served upon them, but argued the responses were insufficient because of their objections. On October 16, 2025, the court denied Appellants' Motion for a Protective Order.

On October 23, 2025, Appellants amended their responses to Respondents' Requests for Admission, withdrawing all objections and providing clear admissions or denials to each request. (A copy of Appellants supplemental responses is attached as **Exhibit G**.) Therein, Ms. Hinckley expressly denied Request No. 11, in support of her contention that she was invited into Plaintiffs' Residence on December 17, 2023. Respondents were supplied with a copy of Appellants' Amended Responses to Respondents' Requests for Admission that same day via e-mail. In that message, counsel sought consultation on the amended discovery responses. (A copy of counsel's correspondence is attached as **Exhibit H**.) Appellants did not receive a response to their request for consultation, nor were they provided with any indication that there were deficiencies in their Amended Responses to the Requests for Admission.

II. October 28, 2025, Motion to Compel Hearing

On October 28, 2025, the Honorable George M. McFaddin, Jr. heard Respondents' Motion to Compel. In that setting the court did not address the sufficiency of Appellants' Amended Responses to Respondents' First Requests for Admission, Respondents' failure to consult with Appellants pursuant to Rule 11 SCRPC, nor did it address whether Appellants' responses to Respondents' Requests for Admission, initial or amended, complied with Rule 36 SCRPC. (A transcript of the October 28, 2025, proceedings is attached as **Exhibit I.**) At the hearing, Respondents did not present Appellants' supplemental responses, which complied with Rule 36, nor did Respondents meaningfully address or challenge their sufficiency. Respondents instead, argued "there was nothing to amend," and asked the court to take the unprecedented step of disregarding Appellants' supplemental responses entirely, retroactively deeming the initial responses "admitted." Despite there being no procedural process for this request, the court consented and retroactively deemed the Respondents initial responses "admitted." The supplemental responses were not acknowledged in the January 29 Order.

The court's decision to retroactively consider the Respondents' responses and treat Appellants' requests as "admitted" effectively adjudicated the merits of the trespass claim against Appellant Diana Hinckley.

LAW/ANALYSIS

South Carolina Code §14-3-330(2)(c) provides for appellate jurisdiction to review, "An order affecting a substantial right made in an action when such an order (a) in effect determines the action and prevents a judgment from which an appeal might be taken or discontinues the action, (b) grants or refuses a new trial, (c) strikes out an answer or any part thereof or any pleading in any action. *See* S.C. Code Ann. § 14-3-330; *see also* Jean Hofer Toal, Amelia Walker & Margaret

Baker, *Appellate Practice in South Carolina*, 151 (3d ed. SC Bar) (providing “[t]he appellate courts may immediately review an order affecting a substantial right in an action when such order strikes an answer, or any part thereof, or any pleading.”). Discovery sanctions under Rule 37(b)(2), SCRPC are generally “interlocutory and not immediately appealable.” *Richardson v. Halcyon Real Estate Services, LLP*, 439 S.C. 419, 887 S.E.2d 153 (2023). However, in this case, the orders in question go beyond mere discovery issues because they have the effect of striking portions of the Appellants’ answer. The test for immediate appealability of orders striking pleadings requires courts to examine the effect of the order rather than its procedural label. “An order affects a substantial right by striking a pleading if the order removes a material issue from the case, thereby preventing the issue from being litigated on the merits, and preventing the party from seeking to correct any errors in the order during or after trial.” *Thornton v. South Carolina Elec. & Gas Corp.*, 391 S.C. 297, 705 S.E.2d 475 (2011). An order is a final judgment if it disposes of “the whole subject-matter or be a termination of the particular proceedings or action, leaving nothing to be done but to enforce by execution what has been determined.” *Richardson*, 439 S.C. at 426, 887 S.E.2d at 157 (quoting *Good v. Hartford Accident & Indem. Co.*, 201 S.C. 32, 41-41, 21 S.E.2d 2019, 212 (1942)). If the court must take a further act “prior to a determination of the rights of the parties, then the order is interlocutory.” *Mid-State Distribs., Inc. v. Century Imps., Inc.* 310 S.C. 330, 335, 426 S.E.2d 777, 780 (1993).

Rule 36(a), SCRPC, states:

“A party may serve upon another party a written request for the admission, for purposes of the pending action only, of the truth of any matters within the scope of Rule 26(b)..that relate to statements or opinions of fact or of the application of law to fact...The matter is admitted unless, within 30 days after the service of the request, or within such shorter or longer time as the court may allow or as stipulated in writing by the parties pursuant to Rule 29 and 6(b), SCRPC, the party to whom the request is directed serves upon the party requesting the admission a written

answer or objection addressed to the matter...If the court determines that an answer does not comply with the requirements of this rule, it may order either that the matter is admitted or that an amended answer be served.”

Any matter admitted under Rule 36 is “conclusively established unless the court on motion permits withdrawal or amendment of the admission.” *Id.*

Here, Respondents asserted a cause of action for trespass against Ms. Hinckley, whom they allege intentionally entered their property without permission. South Carolina defines trespass as occurring when “any person who, without legal cause or good excuse, enters into the dwelling house, place of business or on the premises of another person after having been warned not to do so or any person who, having entered into the dwelling house...or on the premises of another person without having been warned fails and refuses, without good cause or good excuse, to leave immediately upon being ordered or requested to do so by the person in possession.” *See* S.C. Code § 16-11-620. The effect of Ms. Hinckley “admitting” Request for Admission No. 11, which calls her to “Admit that you were not invited into Plaintiffs’ residence on December 17, 2023, by Plaintiff Bruce or Plaintiff Joanne,” is that it establishes the trespass claim against her and it strikes her affirmative defense of license. It leaves no genuine dispute, and no avenue of relief for Ms. Hinckley.

There is no procedural mechanism that allows a party to bypass supplemental responses and retroactively deem Appellant’s Request for Admission No. 11 “admitted.” This, combined with the court’s refusal to consider Appellant Ms. Hinckley’s amended responses, prevents the proper adjudication of the trespass claim, which will be treated as fully established at trial. By essentially striking Ms. Hinckley’s affirmative defense and portion of her Answer in this manner, the court did more than impose a discovery sanction, it affected her substantive right to defend herself against a trespass claim. As a result, the Orders function as a final determination against

Ms. Hinckley and fall squarely within the scope of immediately appealable orders under S.C. Code § 14-3-330(2)(c). This is precisely the type of substantial right referenced in controlling precedent, where an order “affects a substantial right by striking a pleading if the order removes a material issue from the case, thereby preventing the issue from being litigated on the merits, and preventing the party from seeking to correct any errors...during or after trial.” *See Thornton*, 391 S.C. at 304, 705 S.E.2d at 479.

The Orders, which apply to multiple parallel claims asserted against Mr. Hinckley, are sufficiently connected and should be reviewed collectively. *Hodge v. UniHealth Post-Acute Care of Bamberg, LLC*, 422 S.C. 544, 575 n.9, 813 S.E.2d 292, 309 n.9 (Ct. App. 2018) (stating “courts may accept appeals of interlocutory orders not ordinarily appealable when appealed with a companion issue proper for review but not when the issues appealed lacked of sufficient nexus.”); *Ferguson v. Charleston Lincoln/Mercury, Inc.*, 344 S.C. 502, 510, 544 S.E.2d 285, 290 (Ct. App. 2001), *aff’d as modified sub nom. Ferguson v. Charleston Lincoln Mercury, Inc.*, 349 S.C. 588, 564 S.E.2d 94 (2002) (providing “an interlocutory order may be reviewed if it contains appealable issues which are properly before the court.”). The circuit court erred in the same manner with respect to the deemed admissions of Mr. Hinckley. In other words, the errors in the order regarding Diana Hinckley’s deemed admissions are the same error in the order regarding Kris Hinckley’s deemed admissions. Therefore, this Court should hear both issues at the same time.

For these reasons, the Orders of January 29, 2026, and February 13, 2026, are immediately appealable, and Appellants Kris Hinckley and Diana Hinckley respectfully request that this Court accept appellate review to address these critical procedural and substantive errors.

CONCLUSION

For the above reasons, the Court should accept appellate review of the Order granting Respondents' September 16, 2025, Motion to Compel.

HAYNSWORTH SINKLER BOYD, P.A.

s/ Roopal S. Ruparelia

Roopal S. Ruparelia (SC Bar No. 16003)

Diana L. Murray (SC Bar 106165)

1201 Main Street, 22nd Floor

Post Office Box 11889 (29211-1889)

Columbia, South Carolina 29201

(803) 779.3080 - telephone

(803) 765.1243 - fax

rruparelia@hsblawfirm.com

dmurray@hsblawfirm.com

s/Bess J. DuRant (SC Bar No. 77920)

Sowell & DuRant, LLC

1325 Park Street, Ste. 100

Columbia, SC 29201

(803) 722-1100

Bdurant@sowelldurant.com

Attorneys for Appellant Kris and Diana Hinckley

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable George M. McFaddin, Jr., Circuit Court Judge

PROOF OF SERVICE

I certify that I have served the Appellants Kris and Diana Hinckley's Memorandum of Law on Appealability of Orders on all attorneys of record by electronic mail on March 26, 2026, addressed to:

Rhett Ricard, Esquire (SC Bar No. 102353)
J. David Black, Esquire (SC Bar No. 68499)
Nick Fowler, Esquire (SC Bar No. 106908)
Maynard Nexsen PC
205 King Street, Suite 400
Charleston, SC 29401
PH: 843.740.1707
rricard@maynardnexsen.com
dblack@maynardnexsen.com
nfowler@maynardnexsen.com

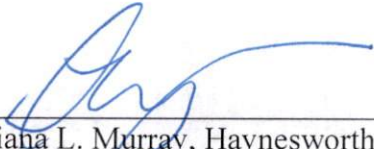
Attorneys for Respondents

Edward C. Boggs, Esquire (SC Bar No. 13506)
135 E. Main St.
Lexington, SC 29072
PH: 803-359-6194
ecb@ecboggsllaw.com

Guardian ad Litem for Cameron Hinckley

Brian P. Hubacher, Esquire (SC Bar No. 103779)
4922 O'Hear Ave., Ste. 301
North Charleston, SC 29405
PH: 843.284.1080
bphubacher@wjcblaw.com

Attorney for Cameron Hinckley



Diana L. Murray, Haynesworth Sinkler Boyd

EXHIBIT E

10/27/2023 12:14:24 PM



10/27/2023 12:15:54 PM



12/17/2023 5:33:44 PM

JoAnn Lovelesd (+18034290614)

Just wanted you to know Lucy is inside playing in case you don't see her



STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Docket No.: 2024-CP-32-05200
)	
BRUCE AND JOANNE LOVELESS,)	
)	
Plaintiff,)	
)	
v.)	DIANNA HINCKLEY’S RESPONSES TO
)	PLAINTIFFS’ FIRST SET OF
CAMERON HINCKLEY, KRIS HINCKLEY,)	REQUESTS FOR ADMISSION
AND DIANA HINCKLEY,)	
)	
Defendants.)	

To: David Black, Esquire, Rhett Ricard, Esquire, and Nick Fowler, Esquire, Counsel to Plaintiffs:

Pursuant to Rule 36 of the South Carolina Rules of Civil Procedure, Defendant Diana Hinckley (“Defendant”), by and through her undersigned counsel, hereby submits the following Answers to Plaintiffs’ First Set of Requests for Admission:

INTRODUCTION

As an initial matter, Defendant objects to the entirety of these Requests for Admission as improper pursuant to Rule 36(c) of the South Carolina Rules of Civil Procedure. Rule 36(c) SCRCF (“the total number of all requests to one party shall not exceed twenty requests, including subparts”). Plaintiffs have propounded twenty-one (21) Requests for Admission, Defendant is unaware which of the twenty-one (21) Requests Plaintiffs intend Defendant to answer. Accordingly, this objection should be considered as applying to each of the twenty-one (21) Requests.

Further, Defendant has filed a motion for protective order citing this deficiency, as well as upon other grounds. See *Baughman v. American Tel. and Tel. Co.*, 306 S.C. 101, 109, 410 S.E.2d 537, 542 (1991) (“A motion for a protective order may be an appropriate response of a party upon whom a request for admissions is served.”). Notwithstanding the foregoing, Defendant provides the following Answers out of an abundance of caution and reserves the right to amend these

Answers once a determination is made as to which twenty (20) Plaintiffs seek Defendant's response to.

ANSWERS

1. Admit that you were aware Defendant Cameron Hinckley had at least one interaction prior to the incident.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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; 4) "interaction" as defined in these Requests is overly broad and vague; 5) the Request is seeking admission of an unspecified, broad, and vague amount of "interaction[s]" related to Defendant's knowledge; and 6) 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.

2. Admit that you were aware Defendant Cameron Hinckley received a Trespass notice from Flex Super Gym.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

3. Admit that Matthew Wheeler contacted you regarding Defendant Cameron Hinckley's behavior.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

4. Admit that you were aware that Defendant Cameron Hinckley was arrested in Tarrant County, Texas for Criminal Trespass around March 2022.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

5. Admit that you were aware that Defendant Cameron Hinckley was arrested in Ventura County, California for stalking on or around July 2, 2022.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

6. Admit that you were aware that Defendant Cameron Hinckley discharged a firearm at or around his father, Defendant Kris Hinckley on or around November 30, 2023.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

7. Admit that you were present in Plaintiffs' Residence when Defendant Cameron Hinckley stabbed Plaintiff Bruce on December 17, 2023.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

8. Admit that you witnessed Defendant Cameron Hinckley stab Plaintiff Bruce in Plaintiffs' Residence on December 17, 2023.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

9. Admit that you did not attempt to provide first aid to Plaintiff Bruce after Defendant Cameron Hinckley stabbed Plaintiff Bruce on December 17, 2023.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

10. Admit that you did not attempt to call 911 after Defendant Cameron Hinckley stabbed Plaintiff Bruce on December 17, 2023.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

11. Admit that you were not invited into Plaintiffs' Residence on December 17, 2023 by Plaintiff Bruce or Plaintiff Joanne.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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; 4) this request calls for Defendant to make a legal conclusion; and 5) 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.

12. Admit that you did not want law enforcement to enter your Residence without a warrant to arrest Defendant Cameron Hinckley after the incident occurred.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

13. Admit that you were aware as of the fall of 2022 that Defendant Cameron Hinckley was on probation in California initiated on or around September of 2022.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

14. Admit that you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

15. Admit that one of the reasons you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022 was related to him being homeless.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

16. Admit that one of the reasons you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022 was related to him having negative interactions with the Church of Latter Day Saints.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

17. Admit that one of the reasons you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022 was related to him having interactions with law enforcement.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

18. Admit that Defendant Cameron Hinckley lived full-time at your Residence since around September of 2022.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

19. Admit that you did not warn your neighbors about Defendant Cameron Hinckley's mental health conditions when he began residing at your Residence.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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.

20. Admit that you were aware that Defendant Cameron Hinckley was prescribed medication for one or more mental health conditions with which he was diagnosed prior to the incident.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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; 4) the phrase "mental health conditions" is overly broad and vague; and 5) 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.

21. Admit that you were aware that Defendant Cameron Hinckley, in the days and weeks immediately prior to the incident, was not taking his medication(s) for one or more mental health conditions with which he was diagnosed as prescribed.

RESPONSE: Subject to and notwithstanding the foregoing objection, Defendant states the following:

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; 4) the phrase "mental health conditions" is overly broad and vague; and 5) 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.

[Signature Page to Follow]

Turner Padget Graham & Laney, P.A.

/s/ *Jacob M. Thompson, III*

Jacob M. Thompson, III

Post Office Box 1473

Columbia, South Carolina 29202

Direct: 803-227-4323

Fax: 803-400-1502

JThompsonIII@turnerpadget.com

Columbia, South Carolina

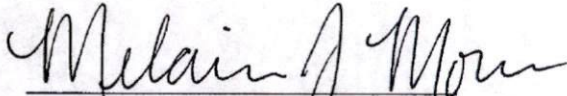
August 20, 2025

ATTORNEYS FOR DEFENDANTS KRIS
HINCKLEY AND DIANA HINCKLEY

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Case No.: 2024-CP-32-05200
)	
Bruce and Joanne Loveless,)	
)	
Plaintiffs,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
Cameron Hinckley, Kris Hinckley, and Diana)	
Hinckley,)	
)	
Defendants.)	

I, Melaina J. Moore, an employee of the Law Firm of Turner, Padgett, Graham & Laney, P.A., do hereby certify that the foregoing *Defendant Diana Hinckley's Answers to Plaintiff's Interrogatories and Defendant Diana Hinckley's Responses to Plaintiff's Requests for Production* were duly served upon counsel of record on the 20th day of August, 2025, via e-mail addressed as follows:

<p style="text-align: center;">J. David Black Maynard Nexen DBlack@maynardnexsen.com</p> <p style="text-align: center;">Attorneys for Plaintiffs</p>	<p style="text-align: center;">Brian P. Hubacher Willson, Jones, Carter & Baxley bphubacher@wjcblaw.com</p> <p style="text-align: center;">Attorneys for Defendant Cameron Hinckley</p>
<p style="text-align: center;">Derek A. Shoemake The Connell Law Firm, LLC derek@lawconnell.com</p> <p style="text-align: center;">Attorneys for Interested Family Member</p>	<p style="text-align: center;">Edward C. Boggs ecb@ecboggsllaw.com</p> <p style="text-align: center;">Guardian Ad Litem for Defendant Cameron Hinckley</p>


Melaina J. Moore, Paralegal

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Docket No.: 2024-CP-32-05200
BRUCE AND JOANNE LOVELESS,)	
)	
Plaintiff,)	
)	
v.)	KRIS HINCKLEY'S RESPONSES TO
)	PLAINTIFFS' FIRST SET OF
CAMERON HINCKLEY, KRIS HINCKLEY,)	REQUESTS FOR ADMISSION
AND DIANA HINCKLEY,)	
)	
Defendants.)	

To: David Black, Esquire, Rhett Ricard, Esquire, and Nick Fowler, Esquire, Counsel to Plaintiffs:

Pursuant to Rule 36 of the South Carolina Rules of Civil Procedure, Defendant Kris Hinckley (“Defendant”), by and through his undersigned counsel, hereby submits the following Answers to Plaintiffs’ First Set of Requests for Admission:

1. Admit that you were aware Defendant Cameron Hinckley had at least one interaction prior to the incident.

RESPONSE: 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; 4) “interaction” as defined in these Requests is overly broad and vague; 5) the Request is seeking admission of an unspecified, broad, and vague amount of “interaction[s]” related to Defendant’s knowledge; and 6) 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.

2. Admit that you were aware Defendant Cameron Hinckley received a Trespass notice from Matthew Wheeler associated with Flex Super Gym.

RESPONSE: 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.

3. Admit that you were aware that Defendant Cameron Hinckley was arrested in Tarrant County, Texas for Criminal Trespass around March 2022.

RESPONSE: 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.

4. Admit that you were aware that Defendant Cameron Hinckley was arrested in Ventura, California for stalking on or around July 2, 2022.

RESPONSE: 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.

5. Admit that you were aware that Defendant Cameron Hinckley discharged a firearm at or around you on or around November 30, 2023.

RESPONSE: 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.

6. Admit that you called law enforcement after Defendant Cameron Hinckley fired a firearm on or around November 30, 2023.

RESPONSE: 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.

7. Admit that you and/or Defendant Diana Hinckley provided financial support and/or assistance to Defendant Cameron Hinckley, directly or indirectly, since he turned eighteen years old.

RESPONSE: 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 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.

8. Admit that you were aware that Defendant Cameron Hinckley had one or more mental health conditions that made him mentally unstable and/or bellicose.

RESPONSE: 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 is still pending; 3) Defendant's motion for a protective order is still pending; 4) the phrase "mental health conditions" is overly broad and vague; 5) the phrase "mentally unstable and/or bellicose" is overly broad, vague, and argumentative; and 6) 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.

9. Admit that you were aware that Defendant Cameron Hinckley was prescribed medication for one or more mental health conditions with which he was diagnosed prior to the incident.

RESPONSE: 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; 4) the phrase "mental health conditions" is overly broad and vague; and 5) 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.

10. Admit that you were aware that Defendant Cameron Hinckley, in the days and weeks immediately prior to the incident, was not taking his medication(s) for one or more mental health conditions with which he was diagnosed as prescribed and/or as frequently as prescribed.

RESPONSE: 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; 4) the phrase "mental health conditions" is overly broad and vague; and 5) 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.

11. Admit that you were asked by law enforcement to remove all firearms from your residence after an interaction on or about October 5, 2023 involving Defendant Cameron Hinckley and law enforcement.

RESPONSE: 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 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.

12. Admit that you were aware as of the fall of 2022 that Defendant Cameron Hinckley was on probation in California initiated on or around September of 2022.

RESPONSE: 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 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.

13. Admit that Defendant Diana Hinckley drove Defendant Cameron Hinckley back from California in the Fall of 2022, despite knowing that he was on probation.

RESPONSE: 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 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.

14. Admit that Defendant Cameron Hinckley lived full-time at your residence since around September of 2022.

RESPONSE: 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 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.

15. Admit that you did not warn your neighbors about Defendant Cameron Hinckley's mental health conditions when he began residing at your residence around September of 2022.

RESPONSE: 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 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.

16. Admit that you and Defendant Diana Hinckley on one or more occasions disagreed on how to manage Defendant Cameron Hinckley when he began residing at your residence around September of 2022.

RESPONSE: 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 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.

17. Admit that you were aware that Defendant Cameron Hinckley was capable of having a violent episode, like the incident.

RESPONSE: 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 is still pending; 3) Defendant's motion for a protective order is still pending; 4) the phrase "violent episode, like the incident" is overly broad, vague, and argumentative; and 5) 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.

Turner Padget Graham & Laney, P.A.

/s/ Jacob M. Thompson, III

Jacob M. Thompson, III
Post Office Box 1473
Columbia, South Carolina 29202
Direct: 803-227-4323
Fax: 803-400-1502
JThompsonIII@turnerpadget.com

Columbia, South Carolina

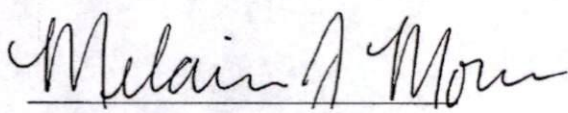
August 20, 2025

ATTORNEYS FOR DEFENDANTS KRIS
HINCKLEY AND DIANA HINCKLEY

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Case No.: 2024-CP-32-05200
)	
Bruce and Joanne Loveless,)	
)	
Plaintiffs,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
Cameron Hinckley, Kris Hinckley, and Diana)	
Hinckley,)	
)	
Defendants.)	

I, Melaina J. Moore, an employee of the Law Firm of Turner, Padgett, Graham & Laney, P.A., do hereby certify that the foregoing *Defendant Kris Hinckley's Answers to Plaintiff's Interrogatories and Defendant Kris Hinckley's Responses to Plaintiff's Requests for Production* were duly served upon counsel of record on the 20th day of August, 2025, via e-mail addressed as follows:

<p>J. David Black Maynard Nexen DBlack@maynardnexsen.com</p> <p>Attorneys for Plaintiffs</p>	<p>Brian P. Hubacher Willson, Jones, Carter & Baxley bphubacher@wjcblaw.com</p> <p>Attorneys for Defendant Cameron Hinckley</p>
<p>Derek A. Shoemake The Connell Law Firm, LLC derek@lawconnell.com</p> <p>Attorneys for Interested Family Member</p>	<p>Edward C. Boggs ecb@ecboggsllaw.com</p> <p>Guardian Ad Litem for Defendant Cameron Hinckley</p>


 Melaina J. Moore, Paralegal

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Docket No.: 2024-CP-32-05200
BRUCE AND JOANNE LOVELESS,)	
)	
Plaintiff,)	
)	
v.)	DIANNA HINCKLEY’S AMENDED
)	RESPONSES TO PLAINTIFFS’ FIRST
CAMERON HINCKLEY, KRIS HINCKLEY,)	SET OF REQUESTS FOR ADMISSION
AND DIANA HINCKLEY,)	
)	
Defendants.)	

To: David Black, Esquire, Rhett Ricard, Esquire, and Nick Fowler, Esquire, Counsel to Plaintiffs:

Pursuant to Rule 36 of the South Carolina Rules of Civil Procedure, Defendant Diana Hinckley (“Defendant”), by and through her undersigned counsel, hereby submits the following Amended Answers to Plaintiffs’ First Set of Requests for Admission:

INTRODUCTION

Pursuant to the verbal agreement, reduced to writing in relevant part, the parties have agreed to amended answers to Plaintiffs requests for admission. In further reliance on that agreement, the parties have agreed that Defendant will respond to Requests 1-20 and that Request No. 21 will be deemed withdrawn.

AMENDED RESPONSES

1. Admit that you were aware Defendant Cameron Hinckley had at least one interaction prior to the incident.

RESPONSE: Defendant admits only to knowledge of those “interactions” admitted in her Answer to Plaintiffs’ Complaint. Defendant denies any portion of this Request that is inconsistent with the foregoing statement.

2. Admit that you were aware Defendant Cameron Hinckley received a Trespass notice from Flex Super Gym.

RESPONSE: Denied.

3. Admit that Matthew Wheeler contacted you regarding Defendant Cameron Hinckley's behavior.

RESPONSE: In responding to this Request, Defendant admits only that, upon information and belief, Matthew Wheeler sent a message to a social media account bearing Defendant's name. Defendant denies any portion of this Request inconsistent with the foregoing statement.

4. Admit that you were aware that Defendant Cameron Hinckley was arrested in Tarrant County, Texas for Criminal Trespass around March 2022.

RESPONSE: Denied.

5. Admit that you were aware that Defendant Cameron Hinckley was arrested in Ventura County, California for stalking on or around July 2, 2022.

RESPONSE: Admitted.

6. Admit that you were aware that Defendant Cameron Hinckley discharged a firearm at or around his father, Defendant Kris Hinckley on or around November 30, 2023.

RESPONSE: Denied as stated.

7. Admit that you were present in Plaintiffs' Residence when Defendant Cameron Hinckley stabbed Plaintiff Bruce on December 17, 2023.

RESPONSE: Admitted.

8. Admit that you witnessed Defendant Cameron Hinckley stab Plaintiff Bruce in Plaintiffs' Residence on December 17, 2023.

RESPONSE: Denied as stated.

9. Admit that you did not attempt to provide first aid to Plaintiff Bruce after Defendant Cameron Hinckley stabbed Plaintiff Bruce on December 17, 2023.

RESPONSE: Admitted.

10. Admit that you did not attempt to call 911 after Defendant Cameron Hinckley stabbed Plaintiff Bruce on December 17, 2023.

RESPONSE: Denied.

11. Admit that you were not invited into Plaintiffs' Residence on December 17, 2023 by Plaintiff Bruce or Plaintiff Joanne.

RESPONSE: Denied.

12. Admit that you did not want law enforcement to enter your Residence without a warrant to arrest Defendant Cameron Hinckley after the incident occurred.

RESPONSE: Denied.

13. Admit that you were aware as of the fall of 2022 that Defendant Cameron Hinckley was on probation in California initiated on or around September of 2022.

RESPONSE: Denied.

14. Admit that you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022.

RESPONSE: Denied.

15. Admit that one of the reasons you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022 was related to him being homeless.

RESPONSE: Denied.

16. Admit that one of the reasons you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022 was related to him having negative interactions with the Church of Latter-Day Saints.

RESPONSE: Denied.

17. Admit that one of the reasons you drove Defendant Cameron Hinckley from California to South Carolina in the Fall of 2022 was related to him having interactions with law enforcement.

RESPONSE: Denied.

18. Admit that Defendant Cameron Hinckley lived full-time at your Residence since around September of 2022.

RESPONSE: Denied.

19. Admit that you did not warn your neighbors about Defendant Cameron Hinckley's mental health conditions when he began residing at your Residence.

RESPONSE: Denied as stated.

20. Admit that you were aware that Defendant Cameron Hinckley was prescribed medication for one or more mental health conditions with which he was diagnosed prior to the incident.

RESPONSE: Denied.

21. Admit that you were aware that Defendant Cameron Hinckley, in the days and weeks immediately prior to the incident, was not taking his medication(s) for one or more mental health conditions with which he was diagnosed as prescribed.

RESPONSE: Per agreement between counsel for Plaintiffs and counsel for Defendant, Defendant is foregoing responding to this Request. To the extent a response is required, Defendant denies the Request.

Turner Padgett Graham & Laney, P.A.

/s/ *Jacob M. Thompson, III*

Jacob M. Thompson, III

Post Office Box 1473

Columbia, South Carolina 29202

Direct: 803-227-4323

Fax: 803-400-1502

JThompsonIII@turnerpadgett.com

Columbia, South Carolina

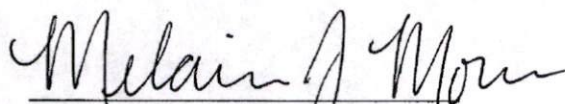
October 23, 2025

ATTORNEYS FOR DEFENDANTS KRIS
HINCKLEY AND DIANA HINCKLEY

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Case No.: 2024-CP-32-05200
)	
BRUCE AND JOANNE LOVELESS,)	
)	
Plaintiffs,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
CAMERON HINCKLEY, KRIS)	
HINCKLEY, AND DIANA HINCKLEY,)	
)	
Defendants.)	

I, Melaina J. Moore, an employee of the Law Firm of Turner, Padgett, Graham & Laney, P.A., do hereby certify that the foregoing ***Defendant Diana Hinckley's Amended Responses to Plaintiffs' Requests for Admission*** were duly served upon counsel of record on the 23rd day of October, 2025, via e-mail addressed as follows:

<p style="text-align: center;">J. David Black Nick Fowler Maynard Nexen DBlack@maynardnexsen.com NFowler@maynardnexsen.com</p> <p style="text-align: center;">Attorneys for Plaintiffs</p>	<p style="text-align: center;">Brian P. Hubacher Willson, Jones, Carter & Baxley bphubacher@wjcblaw.com</p> <p style="text-align: center;">Attorneys for Defendant Cameron Hinckley</p>
<p style="text-align: center;">Derek A. Shoemake The Connell Law Firm, LLC derek@lawconnell.com</p> <p style="text-align: center;">Attorneys for Interested Family Member</p>	<p style="text-align: center;">Edward C. Boggs ecb@ecboggsllaw.com</p> <p style="text-align: center;">Guardian Ad Litem for Defendant Cameron Hinckley</p>


Melaina J. Moore, Paralegal

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Docket No.: 2024-CP-32-05200
BRUCE AND JOANNE LOVELESS,)	
)	
Plaintiff,)	
)	
v.)	KRIS HINCKLEY'S RESPONSES TO
)	PLAINTIFFS' FIRST SET OF
CAMERON HINCKLEY, KRIS HINCKLEY,)	REQUESTS FOR ADMISSION
AND DIANA HINCKLEY,)	
)	
Defendants.)	

To: David Black, Esquire, Rhett Ricard, Esquire, and Nick Fowler, Esquire, Counsel to Plaintiffs:

Pursuant to Rule 36 of the South Carolina Rules of Civil Procedure, Defendant Kris Hinckley (“Defendant”), by and through his undersigned counsel, hereby submits the following Amended Answers to Plaintiffs’ First Set of Requests for Admission. The following amended answers are being provided pursuant to agreement by the parties.

AMENDED ANSWERS

1. Admit that you were aware Defendant Cameron Hinckley had at least one interaction prior to the incident.

RESPONSE: Defendant admits only to knowledge of those “interactions” admitted in his Answer to Plaintiffs’ Complaint. Defendant denies any portion of this Request that is inconsistent with the foregoing statement.

2. Admit that you were aware Defendant Cameron Hinckley received a Trespass notice from Matthew Wheeler associated with Flex Super Gym.

RESPONSE: Denied.

3. Admit that you were aware that Defendant Cameron Hinckley was arrested in Tarrant County, Texas for Criminal Trespass around March 2022.

RESPONSE: Denied.

4. Admit that you were aware that Defendant Cameron Hinckley was arrested in Ventura, California for stalking on or around July 2, 2022.

RESPONSE: Admitted.

5. Admit that you were aware that Defendant Cameron Hinckley discharged a firearm at or around you on or around November 30, 2023.

RESPONSE: Denied as stated.

6. Admit that you called law enforcement after Defendant Cameron Hinckley fired a firearm on or around November 30, 2023.

RESPONSE: Denied as stated.

7. Admit that you and/or Defendant Diana Hinckley provided financial support and/or assistance to Defendant Cameron Hinckley, directly or indirectly, since he turned eighteen years old.

RESPONSE: Admitted.

8. Admit that you were aware that Defendant Cameron Hinckley had one or more mental health conditions that made him mentally unstable and/or bellicose.

RESPONSE: Denied.

9. Admit that you were aware that Defendant Cameron Hinckley was prescribed medication for one or more mental health conditions with which he was diagnosed prior to the incident.

RESPONSE: Denied.

10. Admit that you were aware that Defendant Cameron Hinckley, in the days and weeks immediately prior to the incident, was not taking his medication(s) for one or more mental health conditions with which he was diagnosed as prescribed and/or as frequently as prescribed.

RESPONSE: Denied.

11. Admit that you were asked by law enforcement to remove all firearms from your residence after an interaction on or about October 5, 2023 involving Defendant Cameron Hinckley and law enforcement.

RESPONSE: Admitted.

12. Admit that you were aware as of the fall of 2022 that Defendant Cameron Hinckley was on probation in California initiated on or around September of 2022.

RESPONSE: Denied.

13. Admit that Defendant Diana Hinckley drove Defendant Cameron Hinckley back from California in the Fall of 2022, despite knowing that he was on probation.

RESPONSE: Denied.

14. Admit that Defendant Cameron Hinckley lived full-time at your residence since around September of 2022.

RESPONSE: Denied.

15. Admit that you did not warn your neighbors about Defendant Cameron Hinckley's mental health conditions when he began residing at your residence around September of 2022.

RESPONSE: Denied as stated.

16. Admit that you and Defendant Diana Hinckley on one or more occasions disagreed on how to manage Defendant Cameron Hinckley when he began residing at your residence around September of 2022.

RESPONSE: Denied as stated.

17. Admit that you were aware that Defendant Cameron Hinckley was capable of having a violent episode, like the incident.

RESPONSE: Denied.

Turner Padget Graham & Laney, P.A.

/s/ Jacob M. Thompson, III

Jacob M. Thompson, III

Post Office Box 1473

Columbia, South Carolina 29202

Direct: 803-227-4323

Fax: 803-400-1502

JThompsonIII@turnerpadget.com

Columbia, South Carolina

October 23, 2025

ATTORNEYS FOR DEFENDANTS KRIS
HINCKLEY AND DIANA HINCKLEY

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Case No.: 2024-CP-32-05200
)	
BRUCE AND JOANNE LOVELESS,)	
)	
Plaintiffs,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
CAMERON HINCKLEY, KRIS)	
HINCKLEY, AND DIANA HINCKLEY,)	
)	
Defendants.)	

I, Melaina J. Moore, an employee of the Law Firm of Turner, Padgett, Graham & Laney, P.A., do hereby certify that the foregoing ***Defendant Kris Hinckley's Amended Responses to Plaintiffs' Requests for Admission*** were duly served upon counsel of record on the **23rd** day of **October**, 2025, via e-mail addressed as follows:

<p>J. David Black Nick Fowler Maynard Nexen DBlack@maynardnexsen.com NFowler@maynardnexsen.com</p> <p>Attorneys for Plaintiffs</p>	<p>Brian P. Hubacher Willson, Jones, Carter & Baxley bphubacher@wjcblaw.com</p> <p>Attorneys for Defendant Cameron Hinckley</p>
<p>Derek A. Shoemake The Connell Law Firm, LLC derek@lawconnell.com</p> <p>Attorneys for Interested Family Member</p>	<p>Edward C. Boggs ecb@ecboggsllaw.com</p> <p>Guardian Ad Litem for Defendant Cameron Hinckley</p>

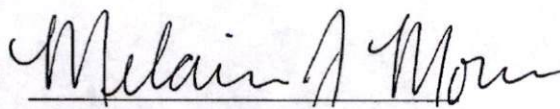

Melaina J. Moore, Paralegal

EXHIBIT I

STATE OF SOUTH CAROLINA) IN THE CIRCUIT COURT
COUNTY OF LEXINGTON) C.A. NO. 2024CP3205200

BURCE LOVELESS)
Plaintiff(s),)
versus)
CAMERON HINCKLEY)
Defendant(s).)

H E A R I N G

Before The Honorable George M McFaddin Jr

DATE: October 20, 2025
LOCATION: South Carolina Circuit Court 14
TRANSCRIBED BY: Jane Daniel

LEGAL EAGLE
Post Office Box 5682
Greenville, South Carolina 29606
864-467-1373
Depos@legaleagleinc.com

1 APPEARANCES:

2 DAVID BLACK, Esquire

3 NICK FOWLER, Esquire

4 Maynard Nexsen PC

5 Suite 700

6 1230 Main Street

7 Columbia, SC 29201

8 Attorneys for the Plaintiff,

9

10 BESS J. DURANT, Esquire

11 Sowell & DuRant, LLC

12 1325 Park Street, Suite 100

13 Columbia, SC 29201

14 Attorney for the Defendant,

15

16 ALSO PRESENT:

17

18

19

20

21

22

23

24

25

1

2

3

INDEX

4

5 Proceedings..... 4

6 Certificate of Transcriber..... 18

7

8

9

10

11

EXHIBITS

12

(None Marked)

13

14

15

16

17

18

19

20

21

22

23

24 (THIS TRANSCRIPT MAY CONTAIN QUOTED MATERIAL. SUCH MATERIAL

25 IS REPRODUCED AS READ OR QUOTED BY THE SPEAKER.)

1

PROCEEDINGS

2

THE COURT: All right. I'll back up now to Loveless v.

3

Hinckley. Do I have those papers, Andre (ph)? I do. Before

4

we start this one, we have everybody here on this one?

5

MR. BLACK: Yes, sir.

6

MS. DURANT: Yes, sir.

7

THE COURT: I have read what I have received late

8

yesterday and this morning. To be very candid we're not

9

going to have an argument fest here today. I'll be glad to

10

hear from each party and take this under consideration, or

11

you can continue it and have another judge give it a lot more

12

time on screen. What do you wish to do?

13

MR. BLACK: Your Honor, I'm David Black. I'm here on

14

behalf of Bruce and Joanne Loveless, the plaintiffs, and I'd

15

be more than happy to make this as brief as possible for your

16

Honor to -- to review it in these factual situations that we

17

found ourselves in.

18

THE COURT: All right. We'll do that. I've got a lot

19

more motions to hear today and this weekend. Just from the

20

tenor of what I received overnight and this morning doesn't

21

appear to be much pleasant about this litigation, which is

22

not unusual. That's okay. You're good lawyers. So let us

23

proceed.

24

MR. BLACK: Thank you, your Honor. Your Honor, I'm

25

David Black. May it please the Court? I represent Bruce

1 Loveless and Jojo Loveless, and I'm here with my co-counsel,
2 Mr. Nick Fowler.

3 THE COURT: Okay.

4 MR. BLACK: Your Honor, by brief way of background,
5 this case stems from the Hinckley's son brutally attacking
6 and attempting to murder Mr. Loveless and then fleeing back
7 to his home and washing off the attempted murder weapon,
8 waiting for police for nearly three hours, and then being
9 arrested.

10 Your Honor, we filed this case shortly after that
11 occurred in December of 2023, and the very first thing we did
12 was issue a spoilage letter, and that went to all parties and
13 went to all the children of the Hinckley's and to everyone
14 else involved.

15 And so the very first thing we did was issue a spoilage
16 letter. Because unfortunately, your Honor, I've been in
17 situations before where documents happened to -- to
18 disappear, and I wanted to make sure with the gravity of this
19 case that that did not occur, your Honor.

20 We sent discovery in this case, it was largely delayed.
21 Keep in mind, this happened almost two years ago. We sent
22 discovery in this case in July. Never received responses
23 back, your Honor, up until last, I believe Thursday prior to
24 this hearing.

25 What had occurred prior to that, your Honor, were

1 several delay tactics of the defendants with attempting to
2 delay this case under the argument that things were happening
3 in the General Sessions court or things that were happening,
4 the courts needed to rule on. Every single one of those
5 events passed, Judge, every one of them.

6 And so when we look back at what the parties were
7 doing, your Honor, you'll see in their brief they -- they say
8 that they thought they had an agreement before they came, and
9 that's why they didn't go to the protective order hearing.

10 Your Honor, let's just say that they had an agreement.
11 Let's play devil's advocate. If they had an agreement to do
12 that and there'd be no discovery, they said they would
13 respond in September. They never did. So even if they had
14 an agreement, they didn't comply with it.

15 So what we did, your Honor, is we went to that hearing
16 on a protective order to cover their request for admission,
17 and they didn't show up. The Court was very bothered by that
18 and in an order indicating that they did not show up.

19 What then happened the -- within a short time
20 thereafter Judge, was the associate on the -- on the case
21 from the plaintiff's, I think it's Mr. Thompson then wrote an
22 ex parte communication to the clerk of court, took off
23 counsel and tried to explain why he didn't attend, why he
24 didn't know about it, et cetera.

25 We were never put onto that copy, Judge. We found out

1 about it after the fact, after the court went ahead and
2 issued the ruling. Under Rule 36 Judge, it's simple.
3 They're left bare on the request for admission. They went
4 out, they moved for protective order. They abandoned that
5 when they did not show up.

6 And the idea that they're going before this court, and
7 arguing that -- that they thought they had an agreement.
8 When you look at the email that's attached to their memo
9 where they said, we'll get you all these documents in
10 September, that never happened, Judge. So we spent six or
11 seven hours getting ready for that hearing that they didn't
12 appear to.

13 So the next thing that happened, Judge, is they were
14 going to try to get things further continued and said they
15 had to go back, take care of an aging family member. While
16 we're sympathetic to that, they canceled mediation went out
17 there, and that's the first time we had ever heard that there
18 was some issue with a family member on why they couldn't
19 answer discovery.

20 So Judge, nearly three months went by. But under Rule
21 36, just as of the request for admission, it's simple, it's
22 black and white. When you get the request for admission,
23 there's only a certain way you can answer them. You can
24 admit, you can deny.

25 They issued that protective order, the motion for

1 protective order. And in that the grounds were that the
2 court had to do other things. That it had to rule on all
3 these motions. What happened in the meantime, Judge, is the
4 court ruled on those and those objections were no longer
5 valid. What they should have done is they should have gone
6 in and filed -- they should have set their admissions, their
7 amended admissions then, they didn't. And so those are
8 deemed admitted.

9 Instead, what they did is on the 11th hour last
10 Thursday, they tried to pull the wall over the court's eyes
11 and said, here's our amended admissions. There was nothing
12 to amend. Then Judge at that time, they made a half-hearted
13 effort to answer our request for interrogatories and request
14 for production, and didn't even send us a single really
15 responsive document that we didn't already have.

16 In the meantime, our discovery was due and we timely
17 complied within the 30 days and turned over nearly 2000
18 documents, Judge, some of which came from those very
19 plaintiffs that we got through FOIA that they've now lied
20 about and said that they didn't have Judge. So it's a very,
21 very serious matter.

22 So Judge, the -- the easy way to look at this isn't to
23 get into the nuts and the bolts of every single request under
24 33 and 34. It's to look at their interrogatories and
25 requests for production. And they didn't respond. What they

1 did is they thought, oh no, we're going to go before the
2 court. They filed this motion to compel and we haven't done
3 anything.

4 We better quickly send something. And they thought,
5 because they sent something, we would respond and tell them,
6 oh, that's not good enough. And then they would come to the
7 court and say, oh, we're trying to work through it.

8 Judge, when you look at what they sent, it was nothing.
9 They made up objections that don't even exist. I've
10 practiced law Judge for nearly 25 years in other very
11 complicated cases, never once in that time have I ever dealt
12 with an objection that said, you don't -- I'm not going to
13 answer this interrogatory because I think you need to go
14 ahead and take a deposition.

15 That's not a valid objection. And when you look at in
16 re anonymous member of the South Carolina bar, that in itself
17 is sanctionable. Under Rule 11 we have attorneys filing
18 things that completely are frivolous arguments.

19 So Judge, it's -- it's simple. Without going through
20 everything they've already admitted they know that they
21 haven't responded fully. The Court just needs to look at it
22 and say, okay, under Rule 36, I see your email here. Did you
23 get them those documents or not? The answer's going to be
24 no. Well, if no, there couldn't have been an agreement, and
25 they didn't show up for the hearing so that's deemed

1 admitted.

2 When we look at Rule 33 and 34 and what they filed, I'm
3 sorry, what they sent us, it was nothing. We sent them over
4 2000 documents and we have documents that they have in their
5 custody and control Judge that they didn't turn over. So
6 what this court needs to do is tell them to comply with -- to
7 fully comply with the requests or they will be sanctioned
8 from this court. It's very simple, judge. Thank you.

9 THE COURT: And a response for the defendants.

10 MS. DURANT: Yes, your Honor. May it please the court.
11 My name is --

12 THE COURT: Yes.

13 MS. DURANT: -- Bess Durant. Can you hear me, your
14 Honor?

15 THE COURT: Okay. I -- I can Ms. Durant, I can,

16 MS. DURANT: I apologize. I -- I am sucking in a
17 lozenge because of my allergies, so I apologize for sounding
18 a little muffled.

19 THE COURT: It's all right.

20 MS. DURANT: But I -- I represent the Hinckley's in a
21 personal capacity. I'm their personal lawyer. Jake
22 Thompson, who was on the call somewhere, is their insurance
23 defense counsel. And -- and I'll be making the argument
24 today. And -- and I hear your, your Honor's point about you
25 don't want -- well, first of all, let -- let me -- let me

1 look at this case from a 30,000-foot perspective.

2 It -- it is an emotional case and it is a heated case
3 without a doubt. And outside of this case, I -- I represent
4 plaintiff's just as much as I represent defendants. And I
5 know as a plaintiff's counsel, you've got to push that gas.
6 I get it. I totally get it.

7 But it's -- the -- the defendants have every right to
8 put up their defenses. And just because they defend against
9 the discovery -- the discovery actions, for lack of a better
10 word a plaintiff, does not mean that we're acting in bad
11 faith. It means that we're putting up our case.

12 And -- and let me give you a broader perspective, your
13 Honor. I heard you read our brief and I thank you for doing
14 that. The very first half of this case -- first of all, this
15 case isn't a year old.

16 I -- I've got cases as you -- as you well know, I --
17 not that I have cases over five years, but I do have a case
18 over five years involving in which I'm plaintiff's counsel
19 has been assigned to one judge, and it's five years old.

20 And I may say every motion that the plaintiff's file --
21 I mean that the defendant's file are specious, it doesn't
22 matter what I say, it matters what you say. And I will
23 submit to you humbly, your Honor, that there is no evidence
24 of bad faith in this case.

25 But -- but from an overarching view of this case, I

1 would say the first half of it, the -- the plaintiffs had to
2 struggle through the issue of suing a judicially determined
3 incompetent individual. And that's Mr. Cameron Hinckley.

4 I think it was Judge McLeod over here in -- or in
5 Lexington declared Mr. Cameron Hinckley incompetent. So how
6 does that impact us, the Hinckley's, Diana and Chris, his
7 parents? Well, the plaintiff started sending out subpoenas
8 seeking information that we -- we didn't know if it had Fifth
9 Amendment issues in it. So we sent -- or I sent objection
10 letters to all those law enforcement agencies saying, hey,
11 just so you know, Mr. Cameron Hinckley is deemed judicially
12 incompetent. He has no lawyer, he has no guardian.

13 Then we -- Judge Doby over in Bishopville ended up
14 giving us a guardian or giving Mr. Hinckley, Cameron Hinckley
15 a guardian after my client's and Mr. Cameron Hinckley's
16 sister's request for a guardian. And then Judge Doby stayed
17 the case for the Guardian to catch up. And I believe he
18 stayed the case until June of some time. It was 30 days
19 after the guardian was appointed, said that the guardian
20 could catch up.

21 Now, Mr. Black is absolutely correct that they're
22 entitled to -- to discovery. I have no issue or qualms with
23 that. but we were dealing with motions to stay the case --
24 to stay the civil case because it -- we wanted the criminal
25 case to go forward. And we were under the belief that the

1 criminal case was going forward in either August or
2 September.

3 Judge Rivers ultimately denied that motion.
4 Simultaneously, we also -- or -- or Mr. Cameron Hinckley's
5 lawyer had a motion to strike allegations involving prior bad
6 acts. That motion has been dealt with. And Mr. Black is
7 right that we also filed a motion for protective order once
8 we were served with a request to admit.

9 And we -- we have every right to do that under the law.
10 And that doesn't mean just because we try to stand in the way
11 of discovery that we are committing -- acting in any bad
12 faith or that I think he -- he referred to us as liars in his
13 argument. That might be hyperbolic, but well, first of all,
14 it's incorrect. But, you know, that's kind of the tenor of
15 the case.

16 And I -- I want to get to the -- the fine points. I
17 want to get back to the South Carolina rules of civil
18 procedure. Your Honor. First of all, Rule 36 says we can
19 object to request to admit, that's what we did. We did it in
20 a timely manner. We objected and we listed all the reasons
21 for our objections. So we satisfied Rule 36.

22 Now, while this is going on, Mr. Hinckley, my client,
23 Mr. Chris Hinckley's mother is dying in Idaho. And they all
24 but moved to Idaho, as you'll see in his affidavit from --
25 let's see, August of sometime till October the 21st. So the

1 Hinckley's are dealing with real life problems. I'm not
2 saying -- I'm not trying to belittle this litigation, please
3 understand that. But he was dealing with 24-hour care of his
4 mother in Idaho. She was 93 years old.

5 And -- and this is the whole purpose of -- of Rule 11,
6 your honor, if we could get together and discuss these issues
7 with plaintiff, a lot of this would be resolved, I humbly
8 submit to you. And now this new information that the -- the
9 plaintiff submitted in their affidavit, or not their
10 affidavit, excuse me, their memo that they served last night,
11 they are now talking about the discovery responses that we
12 served last week. We have not been consulted under Rule 11
13 regarding those at all.

14 I -- I pledge to sit down with Mr. Black, any of his
15 associates, and Mr. Thompson to go through those discovery
16 requests that they have issues with -- I mean, I'm sorry,
17 discovery responses that they have issues with because we're
18 going to have issues with their discovery responses that they
19 served on us last week.

20 So I think a good way to resolve this issue is for us
21 all to sit down, try to take the hot air out of the room from
22 both sides. I'm -- I'm not saying that -- that we're not
23 just as passionate as the plaintiffs, but this is what Rule
24 11's for.

25 Plus, there's no discovery order that we violated.

1 There's no rule of civil procedure that we violated that
2 requires or could even give you the possibility of giving us
3 -- or sanctioning my clients. It -- it is just a situation
4 where cooler heads need to come together to bring this to a
5 resolution.

6 And now the information that Mr. Black is asking you to
7 compel, again, we have never discussed those issues with Mr.
8 Black or his colleagues. We've just served those responses
9 last week. So we're -- I'll commit to sit down with them.
10 Not only will I commit, I -- I say I am obligated under Rule
11 11 to sit down and talk with them about it. And -- and I --
12 I suggest that the plaintiffs do the same and we try to work
13 out these issues.

14 It is just a combination of an emotionally charged case
15 with a client -- he was dealing with his mother who was
16 dying, and then also just the fact that this case was stayed
17 for so long because Mr. Cameron Hinckley did not have a
18 guardian ad litem, and he still rendered judicially
19 incompetent to this day.

20 So with that, your Honor, I -- I -- you've got our
21 briefs. You -- you -- I -- I need to say no more, but if you
22 have any questions, I'm happy to answer them. And I ask that
23 you deny this motion, your Honor. Thank you.

24 THE COURT: All right. Does any other lawyer who
25 hasn't spoken yet want to say anything?

1 MR. THOMPSON: Your Honor, the only thing I would point
2 out, just for the record that is the -- at this -- Mr.
3 Thompson for the -- for the defendants Chris and Diana. That
4 was an inadvertent -- leaving Mr. Black and Mr. Fowler off on
5 my part. I did include, I believe Katherine Indovino on that
6 email. and that again was a mistake on my part, and I
7 apologize for that. It was no way willful.

8 THE COURT: Okay. Anyone else?

9 MR. BLACK: Your Honor, Nick Fowler from my office may
10 want to briefly be heard. He -- he was the one that was
11 dealing with Mr. Thompson, I believe.

12 THE COURT: All right, sir. I don't -- I don't --

13 MR. FOWLER: Yes, your Honor, I --

14 THE COURT: What -- I don't need all -- to hear all the
15 facts now. Just -- just your position because I -- I'm on a
16 timeline here, folks.

17 MR. FOWLER: Yes, your Honor. I -- I would just
18 reiterate that there was no agreement in terms of -- of
19 waiving any of the RFA admissions or that argument, your
20 Honor.

21 THE COURT: All right. This is a case and -- and a
22 motion hearing. And we all know this. We could all go on
23 and on and on today. If I had all day, we could, but I
24 don't. I'm going to take what I have here and six pages of
25 notes and probably won't be today.

1 It probably -- probably will be earliest, maybe
2 Thursday night or Friday that I can get back on this. But I
3 will pledge to get a ruling to you as soon as possible. As
4 soon as possible. Thank you.

5 MR. BLACK: Thank you, Judge. We appreciate it.

6 MS. DURANT: Thank you, your Honor.

7 THE COURT: Thank you.

8 MR. FOWLER: Thank you, your Honor.

9 THE COURT: Thank you.

10 (THERE BEING NO FURTHER QUESTIONS, THIS HEARING IS RECESSED)

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

IN THE COURT OF COMMON PLEAS

Case No. _____

Bruce and Joanne Loveless,
Plaintiffs,

SUMMONS

vs.

(Jury Trial Requested)

Cameron Hinckley, Kris Hinckley and Diana
Hinckley,
Defendants.

TO DEFENDANTS ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscriber at 205 King Street, Suite 400, Charleston, South Carolina 29401 within thirty (30) days from the service hereof, exclusive of the date of such service, and in case of the failure to do so, judgment by default will be rendered against you for the relief demanded in the Complaint.

[Signature Block on Separate Page]

s/ Rhett Ricard

Rhett Ricard, SC Bar No. 102353
Nick Fowler, SC Bar No. 106908
MAYNARD NEXSEN PC
205 King Street, Suite 400
Charleston, SC 29401
843.740.1707

J. David Black, SC Bar No. 68499
MAYNARD NEXSEN PC
1230 Main Street, Suite 700
Columbia, SC 29201
803.540.2187

Attorneys for Plaintiffs
Bruce and Joanne Loveless

December 17, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

IN THE COURT OF COMMON PLEAS

Case No. _____

Bruce and Joanne Loveless,
Plaintiffs,

COMPLAINT

vs.

(Jury Trial Requested)

Cameron Hinckley, Kris Hinckley and Diana
Hinckley,
Defendants.

Plaintiffs Bruce and Joanne Loveless (collectively, "Plaintiffs"), by and through their undersigned attorneys, hereby allege and state their complaint against Defendants Cameron Hinckley, Kris Hinckley, and Diana Hinckley (collectively "Defendants") as follows:

PARTIES AND JURISDICTION

1. Plaintiff Bruce Loveless ("Mr. Loveless") is a resident and citizen of Lexington County and the State of South Carolina.
2. Plaintiff Joanne Loveless ("Mrs. Loveless") is a resident and citizen of Lexington County and the State of South Carolina.
3. Plaintiffs reside at 1061 Loveless Lane in Chapin, South Carolina (the "Loveless Residence").
4. Upon information and belief, Defendant Cameron Hinckley ("Cameron") is a resident and citizen of Lexington County and the State of South Carolina.
5. Upon information and belief, Defendant Kris Hinckley ("Kris") is a resident and citizen of Lexington County and the State of South Carolina.
6. Upon information and belief, Defendant Diana Hinckley ("Diana") is a resident and

citizen of Lexington County and the State of South Carolina.

7. Defendants reside at 1051 Point View Road in Chapin, South Carolina (the “Hinckley Residence”).

8. Defendant Cameron is the son of Defendants Kris and Diana and, upon information and belief, resided full-time at the Hinckley Residence at all times relevant to the allegations herein.

9. This Court has jurisdiction over all parties in this matter as all parties are residents of South Carolina.

10. Venue is proper in this Court pursuant to Section 15-7-30(C) of the South Carolina Code as Defendants resides in Lexington County and the acts and occurrences giving rise to this claim arose in Lexington County, South Carolina.

FACTUAL ALLEGATIONS

11. This lawsuit stems from Defendant Cameron’s violent attack on Mr. Loveless in December 2023 and the failure of Defendants Kris and Diana to properly supervise, monitor, and warn the Plaintiffs about Cameron’s violent propensities, which culminated in the brutal attack of Mr. Loveless.

Hinckley Residence

12. Upon information and belief, Defendants Kris and Diana moved to the Hinckley Residence in December 2020.

13. Upon information and belief, Defendant Cameron has lived periodically at the Hinckley Residence since December 2020 and permanently moved to the Hinckley Residence in August 2022 and resided there since that time through all times relevant to the allegations herein.

Defendant Cameron Hinckley

14. Upon information and belief, Defendant Cameron is the youngest child of Defendants Kris and Diana.

15. Upon information and belief, Defendant Cameron has lived under the supervision and control of Defendants Kris and Diana.

16. As detailed below, Defendants Kris and Diana were well aware of Defendant Cameron's propensity for violent behavior as early as Defendants' relocation to the Hinckley Residence in Chapin, South Carolina in 2020.

17. Defendant Cameron has been involved in numerous crimes and criminal lawsuits—including, but not limited to, breaking and entering, harassment, and stalking—throughout the United States.

Defendant Cameron's Threatening Incidents at Local Gyms

18. Defendant Cameron has had multiple violent and unsafe incidents at local gyms and/or businesses in Chapin, South Carolina.

A. FLEX Supergym Incident:

19. On or about January 2021, Chapin Police Department ("Chapin PD") was dispatched to a local Chapin gym, FLEX Supergym ("FLEX"), after receiving a call from FLEX's owner, due to an unprovoked assault and verbal altercation Defendant Cameron initiated wherein Defendant Cameron became visibly irate and threatened to break the ribs of FLEX's owner. See attached Affidavit of Matthew Wheeler as Exhibit A, which is incorporated herein.

20. FLEX's owner requested that Chapin PD put Defendant Cameron on trespass notice. Chapin PD opened an investigation. See Exhibit A at ¶ 10.

21. To retaliate against FLEX's owner, Defendant Cameron created multiple fake

social media profiles and began continuously harassing and threatening FLEX's owner. See Exhibit A at ¶¶ 11–12.

22. Notably, one or more of Defendant Cameron's Instagram handles, i.e. usernames used to identify oneself on Instagram, that were used to harass and threaten FLEX's owner ended in specific numbers referencing calibers of different firearms or projectiles. See Exhibit A at ¶ 12.

23. Defendants Kris and Diana were put on notice of Defendant Cameron's harassing and threatening actions towards FLEX and FLEX's owner at least twice:

- a. Upon information and belief, Chapin PD visited the Hinckley Residence in the course of FLEX's owner's investigation, during which Defendant Diana warned Chapin PD not to return to the Hinckley Residence to investigate Defendant Cameron again or she would sue the police department; and
- b. FLEX's owner contacted Defendant Diana to discuss Defendant Cameron's continuous harassment and threats.

See Exhibit A at ¶ 13.

24. Around June 2021, FLEX's owner agreed not to press charges against Defendant Cameron if (1) Defendant Cameron agreed to cease his persistent harassment and threats towards FLEX's owner; and (2) Defendants Kris and Diana agreed to get mental health assistance for Defendant Cameron. See Exhibit A at ¶¶ 13 and 14.

B. Unnamed Chapin Gym Incident:

25. On or about September 2022, Defendant Cameron visited a separate local Chapin gym ("Unnamed Chapin Gym") multiple times and demonstrated a pattern of irregularly aggressive behavior with the gym's equipment including, but not limited to, aggressively throwing and slamming heavy weights on the ground.

26. As Defendant Cameron entered Unnamed Chapin Gym on one particular visit, Unnamed Chapin Gym's owner requested Defendant Cameron cease his aggressive and destructive behavior with gym equipment moving forward. Defendant Cameron agreed and was allowed to enter the gym.

27. However, during Defendant Cameron's workout, Defendant Cameron informed Unnamed Chapin Gym's owner that he wanted to cancel his membership and Unnamed Chapin Gym's owner responded in the affirmative.

28. As Defendant Cameron left, he became aggressive and verbally threatened and assaulted a male employee of Unnamed Chapin Gym, all of which was unprovoked.

29. Unnamed Chapin Gym's owner called Chapin PD and requested they patrol the Unnamed Chapin Gym parking lot for the remainder of the day.

30. On or about January 9, 2023, FLEX's owner informed Chapin PD that Defendant Cameron "has already committed chargeable offenses at [FLEX] and [Unnamed Chapin Gym], and will continue to be a danger to the community until Chapin PD takes appropriate action".

Multi-state Arrests

31. Upon information and belief, on or about September 2021, Defendant Cameron was arrested for driving without a license and without car insurance in Honolulu, Hawaii.

32. Approximately one year later, on or about July 2, 2022, Defendant Cameron was arrested for stalking in Ventura County, California.

33. On or about July 15, 2022, a Request for Civil Harassment Temporary Restraining Order was filed in Ventura County Superior Court in California against Defendant Cameron. A hearing date was scheduled for August 8, 2022.

34. Defendant Cameron appeared at the September 7, 2022 hearing in Ventura County

Superior Court. A Permanent Restraining Order was ordered against Defendant Cameron at the hearing. As a result of the Permanent Restraining Order, Defendant Cameron was entered into the California Law Enforcement Telecommunications System (“CLETS”).

35. As a result of the CLETS Permanent Restraining Order, Defendant Cameron was prohibited from owning or possessing a firearm for a period of five years. Also upon information and belief, as a result of the CLETS Permanent Restraining Order, he was prohibited from leaving the State of California.

36. Defendant Cameron was also ordered at the September 7, 2022 hearing to continue mental health therapy. He was ordered to show Proof of Mental Health Therapy and have no contact with the victims. Defendant Cameron was released on probation on these terms and conditions (“Ventura Probation”).

37. Upon information and belief, Defendant Diana traveled to California to retrieve Defendant Cameron after his release. Defendant Cameron traveled to Chapin, South Carolina with Defendant Diana to the Hinckley Residence.

38. Defendant Cameron did not appear at the next review hearing held on November 7, 2022. Defendant Cameron’s Ventura Probation continued on the same terms and conditions.

39. Defendant Cameron did not appear at the following review hearing held on January 18, 2023. Defendant Cameron’s Ventura Probation continued on the same terms and conditions.

October 5, 2023 Incident

40. On or about October 5, 2023, Lexington County Sheriff’s Department (“LCSD”) was dispatched to the Hinckley Residence for a physical domestic incident between Defendant Cameron and his father, Defendant Kris.

41. Defendant Kris called LCSD dispatch and advised that Defendant Cameron had

pushed him and he had taken a rifle and fired it into the air.

42. Defendant Kris stated to LCSD on scene that Defendant Cameron has a history of mental issues and is not on his medication.

43. Bill Kerchusky (“Bill” or “Mr. Kerchusky”) resides on Point View Road adjacent to the Hinckley Residence.

44. Mr. Kerchusky and another neighbor witnessed the October 5, 2023 incident. See attached Affidavit of Bill Kerchusky as **Exhibit B**. Mr. Kerchusky’s Affidavit is incorporated herein.

45. Once Defendant Cameron fled the initial incident with his father, Mr. Kerchusky spoke with Defendant Kris and during his conversation, Mr. Kerchusky noticed Defendant Cameron coming out of the woods and running towards him with a gun and yelling, “I’m gonna kill you!” Mr. Kerchusky immediately ran to the safety of his home and called 911. The dispatcher told Mr. Kerchusky to remain on the floor of his home until responders arrived. See Exhibit B at ¶¶ 11–13.

46. Defendant Kris requested LCSD dispatch Lexington County Emergency Medical Services (“LCEMS”) to evaluate Defendant Cameron due to his erratic behavior.

47. Defendant Diana advised LCSD that she believes Defendant Cameron is an undiagnosed schizophrenic and is a narcissist who causes family issues often. Defendant Diana also informed LCSD that Defendant Cameron had moved back to the Hinckley Residence, because Defendant Cameron was “homeless, starving, and in trouble with the law” in California.

48. LCSD Deputy Ruiz advised Defendants Kris and Diana to remove firearms in the home and keep them away from Defendant Cameron for the time being.

49. LCSD advised Defendants Kris and Diana to call the Community Crisis Response

and Intervention ("CCRI") number in the future when they believe Defendant Cameron enters into a mental crisis. LCSD then left the scene.

Attempted Murder and Stabbing of Bruce Loveless

50. In the early morning hours of December 17, 2023 around 2:00 am, Mrs. Loveless let her two dogs out the Loveless' back door. The dogs immediately began barking. Mrs. Loveless investigated the excessive barking to find Defendant Cameron, in a black hoodie, standing on the Loveless' back patio, in which Defendant Cameron had to enter via the Loveless Residence fence.

51. Mrs. Loveless woke Mr. Loveless who went to the back patio. Mr. Loveless yelled at Defendant Cameron to get off the Loveless Residence property and not return.

52. In the early evening that same day, December 17, 2023, Mr. Loveless walked the Loveless dogs. Lucy, the Hinckley family dog, joined the end of Mr. Loveless' walk without any of the Defendants accompanying her. Mr. Loveless returned to the Loveless Residence and Lucy followed.

53. Given that it was raining, Mrs. Loveless decided to let Defendant Diana know that Lucy was loose at the Loveless Residence.

54. Mrs. Loveless sent a text to Defendant Diana and, at that same time, there was a knock at the Loveless Residence side kitchen door. Mrs. Loveless answered the side kitchen door to find Defendants Diana and Cameron standing at the Loveless Residence door. Mrs. Loveless told Defendant Diana she had just hit send on a text message stating that Lucy was loose at the Loveless Residence. Upon information and belief, Defendant Diana did not see Mrs. Loveless' text message.

55. Simultaneous with Mrs. Loveless answering the side kitchen door, Mr. Loveless was on the back patio porch kneeling down to fix a pilot light on the fire pit.

56. Back at the kitchen side door, Defendant Cameron was standing behind Defendant Diana frantically looking from left to right before he made eye contact with Mrs. Loveless and started fidgeting with his hands in his black hoodie pocket. Defendant Cameron was dressed in the same outfit from the incident in the early morning hours at the Loveless Residence—a black hoodie pulled over his head.

57. Defendant Cameron then violently pushed Mrs. Loveless to the side and barged into the Loveless Residence, uninvited.

58. Defendant Cameron charged through the kitchen and living room and then directly out the back door to Mr. Loveless. Defendant Cameron had never been in the Loveless Residence before and would not have known the path to get to the back patio from the kitchen side door but for spying or peering into the Loveless Residence prior.

59. Notably, there was no way for Defendant Cameron to know that Mr. Loveless was on the back patio from the front of the Loveless Residence or from the kitchen side door of the Loveless Residence, but for stalking Mr. Loveless prior to Diana knocking on the Loveless Residence side kitchen door.

60. Defendant Cameron stood next to Mr. Loveless for a moment before Mr. Loveless recognized Defendant Cameron. Mr. Loveless then stood up to see Defendant Cameron on the back patio.

61. Upon information and belief, Defendant Cameron concealed a knife on his person taken from the Hinckley Residence.

62. Defendant Cameron then pulled his concealed knife and brutally stabbed Mr. Loveless eleven (11) times, beginning in his forehead and moving down towards his abdomen.

63. Defendant Diana was not screaming—she simply stated “Cameron” twice.

Defendant Diana never instructed Defendant Cameron to stop the attack, and she never attempted to get Defendant Cameron off of Mr. Loveless.

64. After Defendant Cameron brutally stabbed Mr. Loveless eleven (11) times, Defendant Cameron calmly stood up, stated he was finished with what he went to the Loveless Residence to do, and retreated back to the Hinckley Residence.

65. Defendant Diana followed Defendant Cameron out of the Loveless Residence. Defendant Diana did not render aid to Mr. Loveless or Mrs. Loveless.

66. Mr. Loveless was able to drag himself into the Loveless Residence to seek safety in a locked bathroom while Mrs. Loveless called a neighbor and the police.

67. Upon information and belief, upon returning home, Defendant Diana cut the lights out at the Hinckley Residence to create an illusion of an empty home.

68. Once Mr. Loveless was being taken into the ambulance by the paramedics, he heard Defendants Cameron and Diana arguing on the Hinckley Residence deck. Defendant Cameron told Defendant Diana that she should have heard what Mr. Loveless said to him.

69. LCSD and a Special Weapons and Tactics team ("SWAT") responded to the Hinckley Residence.

70. Defendant Diana refused to allow responders to enter her home until they obtained a warrant.

71. Defendant Cameron was arrested by LCSD on December 17, 2023.

72. Upon information and belief, at the date of filing this Complaint, LCSD has not recovered the firearms that were in Defendant Cameron's possession and that Defendant Kris removed from his possession and the Hinckley Residence on or after December 17, 2023.

73. Upon information and belief, at the date of filing this Complaint, the location of the

firearms that were in Defendant Cameron's possession and that Defendant Kris removed from his possession and the Hinckley Residence on or after December 17, 2023 remains unknown.

74. Defendant Cameron was charged with attempted murder, first-degree burglary, possession of a weapon during violent crime, and second-degree assault and battery.

75. Mr. Loveless obtained extensive, debilitating, and permanent injuries directly caused by Defendant Cameron's unprovoked and violent attack on Mr. Loveless and Defendants Kris and Diana's negligence to properly supervise, monitor, and warn Plaintiffs of Defendant Cameron's violent propensities.

76. As a direct result of Defendant Cameron's and Defendants Kris and Diana's actions, or lack thereof, Mr. Loveless had to undergo extensive life-saving surgeries.

77. As a direct result of Defendant Cameron's brutal attack on Mr. Loveless and Defendants Kris and Diana's negligence, Plaintiffs have suffered and will continue to suffer as more fully set forth herein.

FOR A FIRST CAUSE OF ACTION
(Trespass against Defendants Cameron Hinckley and Diana Hinckley)

78. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

79. Upon information and belief, early in the morning hours of December 17, 2023, Defendant Cameron intentionally entered onto Plaintiffs' property without permission and was informed by Mr. Loveless to get off the Loveless Residence property and not return.

80. In the evening of December 17, 2023, Defendants Cameron and Diana both intentionally entered onto Plaintiffs' property without permission.

81. Defendants' actions to trespass onto Plaintiffs' property were intentional and affirmative acts.

82. Defendant Cameron affirmatively and intentionally barged in and pushed Mrs. Loveless to the side and proceeded to run through the Loveless Residence kitchen and living room to violently stab Mr. Loveless on the back patio.

83. Defendants' actions caused Plaintiffs' harm, which was a direct result of Defendants Cameron's and Diana's invasion.

84. Defendants Cameron and Diana's trespass on the Loveless Residence was willful, wanton, or in reckless disregard to Plaintiffs' rights.

85. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR A SECOND CAUSE OF ACTION
(Assault against Defendant Cameron Hinckley)

86. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

87. On December 17, 2023, Defendant Cameron shoved Mrs. Loveless and tackled and brutally stabbed Mr. Loveless eleven (11) times in their own home.

88. Defendant Cameron's conduct of shoving Mrs. Loveless and stabbing Mr. Loveless placed Plaintiffs in reasonable fear of bodily harm by, among other things, Defendant Cameron brandishing a knife and threatening Plaintiffs.

89. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR A THIRD CAUSE OF ACTION
(Battery against Defendant Cameron Hinckley)

90. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

91. On December 17, 2023, Defendant Cameron shoved Mrs. Loveless and tackled and brutally stabbed Mr. Loveless eleven (11) times in their own home.

92. Defendant Cameron inflicted unlawful and unauthorized violence against Mrs. Loveless by shoving her and against Mr. Loveless by tackling him to the ground and stabbing him eleven (11) times with a knife.

93. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR A FOURTH CAUSE OF ACTION
(Intrusion into Private Affairs against Defendant Cameron Hinckley)

94. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

95. Defendant Cameron intentionally intruded onto the Loveless Residence property on at least two occasions without permission including, but not limited to:

- a. In the early morning hours of December 17, 2023, wherein Defendant Cameron was found on the back patio walkway around 2:00 AM; and
- b. In the evening of December 17, 2023, when Defendant Cameron was found standing beside Diana at the Loveless Residence side kitchen door and he barged past Mrs. Loveless through the Loveless Residence kitchen and living room to get to Mr. Loveless on the back patio.

96. Other similar intrusive conduct and instances may be established during the course of discovery in this matter as well.

97. Plaintiffs expect their day-to-day life at their home—the Loveless Residence—to be private and free from exposure to others.

98. Defendant Cameron’s intentional intrusion as set forth herein consisted of watching, spying, prying, besetting, overhearing, and/or other similar conduct as may be established during the course of discovery of this matter.

99. Defendant Cameron’s intrusion on Plaintiffs at their home was substantial and unreasonable.

100. As a direct and proximate result of Defendant Cameron’s wanton invasion into areas of Plaintiffs’ home in which one normally expects to be free from exposure, Plaintiffs have suffered emotional distress and other damages.

101. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR A FIFTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress / Outrage
against Defendant Cameron Hinckley)

102. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

103. The Loveless Residence has been Plaintiffs’ home for the last forty-three (43) years. The Loveless Residence has been the foundational bedrock on which Plaintiffs have built their lives and raised their family.

104. Defendant Cameron intentionally and recklessly inflicted severe emotional distress

on Plaintiffs shoving Mrs. Loveless and viciously stabbing Mr. Loveless in their home and in the presence of Mrs. Loveless.

105. Defendant Cameron's conduct was so extreme and outrageous as to exceed all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized community.

106. Defendant Cameron's actions caused Plaintiffs severe emotional distress.

107. Plaintiffs continue to suffer and will continue to suffer from the following non-exhaustive list: severe pain and suffering, emotional distress, mental anguish, psychological trauma, post-traumatic stress, depression, insomnia, nightmares, embarrassment, severe anxiety, panic attacks, shock, worry, loss of work and lost profits, loss of enjoyment of life, scarring and disfigurement, and loss of safety and security in Plaintiffs' own home associated with the horrific events of December 17, 2023.

108. Plaintiffs' aforementioned harm, including but not limited to their emotional distress, arises directly out of the actual physical injury caused by Defendant Cameron.

109. Plaintiffs no longer feel safe in their home and continuously fear for their safety and the safety of their family.

110. Plaintiffs no longer harbor the same loving memories associated with their home as a direct result of the acts committed by Defendant Cameron. Plaintiffs believe Defendants ruined their family's "paradise."

111. This emotional distress is so severe that no reasonable man or woman could be expected to endure it.

112. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount

to be shown at trial.

FOR A SIXTH CAUSE OF ACTION
(Loss of Consortium against Defendant Cameron Hinckley)

113. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

114. Defendant Cameron brutally stabbed Mr. Loveless eleven (11) times and is directly liable for his injuries.

115. Plaintiff Mrs. Loveless has suffered damages as a result of Mr. Loveless's injuries including, but not limited to, the loss of love, companionship, comfort, care, assistance, protection, affection, society, moral support, the loss of the enjoyment of sexual relations, and the loss of safety and security in her own home.

116. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR A SEVENTH CAUSE OF ACTION
(Negligence / Gross Negligence / Negligence *Per Se* against Defendant Cameron Hinckley)

117. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

118. Defendant Cameron owed a duty to Plaintiffs not to intrude onto the Loveless Residence and not to brutally attack Mr. Loveless.

119. Plaintiffs' injuries and damages were directly and proximately caused and occasioned by the negligence, recklessness, wantonness, and grossly negligent conduct of Defendant Cameron, including but not limited to one or more of the following particulars:

- a. In Defendant Cameron entering the Loveless Residence without permission;

- b. In Defendant Cameron bringing and brandishing a knife into the Loveless Residence;
- c. In Defendant Cameron stalking and prying into the Loveless Residence prior to the violent attack;
- d. In Defendant Cameron shoving Mrs. Loveless; and
- e. In Defendant Cameron violently attacking and stabbing Mr. Loveless eleven (11) times in Plaintiffs' own home; and
- f. In any other such ways as may be determined through discovery.

120. All of the above constitute violations of the duties owed by Defendant Cameron and the laws and regulations of the State of South Carolina, and were the direct and proximate cause of Plaintiffs' injuries and damages as set forth more fully below.

121. The damages that Plaintiffs have suffered are a direct and proximate result of Defendant Cameron's breach of his duties.

122. As a direct and proximate cause of Defendant Cameron's negligent, negligent *per se*, careless, reckless, grossly negligent, and willful and wanton conduct, Plaintiffs have suffered, and will continue to suffer, physical injuries, pain, suffering, mental anguish, emotional distress, psychological trauma, shock, worry, frustration, extreme emotional injuries, nightmares, embarrassment, loss of enjoyment of life, scarring and disfigurement, loss of safety and security in own home, and lost wages and diminished earning capacity.

123. Plaintiffs' aforementioned harm, including but not limited to their emotional distress, arises directly out of the actual physical injury caused by Defendant Cameron.

124. As a direct and proximate cause of Defendant Cameron's negligent, negligent *per se*, careless, reckless, grossly negligent, and willful and wanton conduct Plaintiffs suffered

economic damages associated with Mr. Loveless' injuries and damages.

125. As a direct and proximate result of Defendant Cameron's breaches, Plaintiffs have suffered damages as more fully set forth herein.

126. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR AN EIGHTH CAUSE OF ACTION

(Negligence / Gross Negligence / Negligence *Per Se* against Defendants Kris Hinckley and Diana Hinckley)

127. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

128. Defendants Kris and Diana had a special relationship and/or special circumstance with Defendant Cameron due to Defendant Cameron's known violent propensities, mental health issues, provisions mandated by the Ventura Probation, and incidents with FLEX and the Unnamed Chapin Gym.

129. Defendants Kris and Diana owed a duty to Plaintiffs to warn Plaintiffs of Defendant Cameron's intentions and/or propensity to hurt Mr. Loveless and/or neighbors.

130. Defendants Kris and Diana owed a duty to Plaintiffs to monitor and supervise Defendant Cameron.

131. Plaintiffs' injuries and damages were directly and proximately caused and occasioned by the negligence, recklessness, wantonness, and grossly negligent conduct of Defendants, including but not limited to one or more of the following particulars:

- a. In Defendants Kris and Diana failing to supervise and monitor Defendant Cameron, whom they knew had mental health issues;

- b. In Defendants Kris and Diana failing to supervise and monitor Defendant Cameron, whom they knew had violent propensities;
- c. In Defendant Diana not intervening when Defendant Cameron began violently stabbing Mr. Loveless; and
- d. In any other such ways as may be determined through discovery.

132. All of the above constitute violations of the duties owed by Defendants Kris and Diana and the laws and regulations of the State of South Carolina, and were the direct and proximate cause of Plaintiffs' injuries and damages as set forth more fully below.

133. The damages that Plaintiffs have suffered are a direct and proximate result of Defendants Kris and Diana's breach of their respective duties.

134. As a direct and proximate cause of Defendants Kris and Diana's negligent, negligent *per se*, careless, reckless, grossly negligent, and willful and wanton conduct, Plaintiffs have suffered, and will continue to suffer, physical injuries, pain, suffering, mental anguish, emotional distress, psychological trauma, shock, worry, frustration, extreme emotional injuries, nightmares, embarrassment, loss of enjoyment of life, scarring and disfigurement, loss of safety and security in own home, and lost wages and diminished earning capacity.

135. Plaintiffs' aforementioned harm, including but not limited to their emotional distress, arises directly out of the actual physical injury caused by Defendant Cameron that was aided and abetted by the negligence of Defendants Kris and Diana.

136. As a direct and proximate cause of Defendants Kris and Diana's negligent, negligent *per se*, careless, reckless, grossly negligent, and willful and wanton conduct Plaintiffs suffered economic damages associated with Mr. Loveless' injuries and damages.

137. As a direct and proximate result of Defendants Kris and Diana's respective

breaches, Plaintiffs have suffered damages as more fully set forth herein.

138. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR A NINTH CAUSE OF ACTION
(Negligent Entrustment against Defendants Kris Hinckley and Diana Hinckley)

139. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

140. Defendant Cameron has a history of malicious and violent behavior towards the public.

141. Defendants Kris and Diana were aware of Defendant Cameron's violent history and propensity and mental health issues.

142. Defendants Kris and Diana allowed Defendant Cameron access to inherently dangerous chattel and instrumentalities while under their care and supervision.

143. Defendants Kris and Diana had a duty to safeguard the public from Defendant Cameron's use of inherently dangerous chattel.

144. Defendants Kris and Diana knew or should have known that Defendant Cameron could not be trusted with inherently dangerous chattel due to his violent history, criminal background, and Ventura Probation.

145. This knowledge is evidenced by Defendant Kris and Diana's overt actions to remove firearms from their residence to prevent Defendant Cameron's access to them.

146. Defendants Kris and Diana breached their duty by negligently permitting Defendant Cameron to have access to and entrusting him with dangerous instrumentalities which were ultimately used to severely injure Mr. Loveless.

147. Defendants Kris and Diana's breach of their duty was a proximate cause of Plaintiffs' injuries.

148. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR A TENTH CAUSE OF ACTION
(Negligent Supervision against Defendants Kris and Diana Hinckley)

149. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

150. Defendants Kris and Diana possessed a special relationship with Defendant Cameron.

151. Defendants Kris and Diana supervised and monitored Defendant Cameron while living at the Hinckley Residence, and they knew or should have known he was likely to cause bodily harm to others if not controlled and supervised.

152. Defendants Kris and Diana were aware and knew of Defendant Cameron's violent personality; indeed, they experienced it themselves during multiple domestic incidents at the Hinckley Residence.

153. Defendants Kris and Diana were aware and knew of Defendant Cameron's mental health issues.

154. Upon information and belief, Defendants Kris and Diana were aware of the terms of Defendant Cameron's Ventura Probation.

155. Defendants Kris and Diana were aware of violent and life-threatening threats Defendant Cameron made to neighbors while illegally in possession of a firearm.

156. Defendants Kris and Diana were well aware that Defendant Cameron's dangerous

threats were real and likely to occur.

157. Defendants Kris and Diana were in a position to control Defendant Cameron.

158. Defendants Kris and Diana knew of the credible threat that Defendant Cameron posed to Plaintiffs and breached their duty to exercise reasonable care to issue a warning to Plaintiffs.

159. This breach is a direct and proximate cause of Plaintiffs' injuries.

160. Plaintiffs are entitled to an award of actual, consequential, and punitive damages, as well as for all damages allowed under the law and as set forth more fully herein in an amount to be shown at trial.

FOR AN ELEVENTH CAUSE OF ACTION
(Violation of S.C. Code Ann. § 27-23-10 ("Statute of Elizabeth") against Defendant Cameron)

161. Plaintiffs reallege and incorporate the preceding facts and allegations of their Complaint as if fully set forth verbatim.

162. Defendant Cameron knew that his violent attack on Mr. Loveless in December 2023 could result in him owing damages and other forms of recovery to the Plaintiffs.

163. Removing any doubt of potentially pending litigation, Defendant Cameron was sent a preservation letter on January 3, 2024 explaining that litigation is anticipated and not to destroy relevant evidence.

164. Upon information and belief, Defendant Cameron was the owner of assets, including a Texas Corporation, CTH Roofing.

165. Upon information and belief, after Defendant Cameron's violent attack on Mr. Loveless, Defendant Cameron fraudulently transferred ownership of assets, including but not limited to CTH Roofing, to another person or entity.

166. Upon information and belief, Defendant Cameron fraudulently transferred his assets to another person or entity with the express intent or purpose to delay, hinder, or defraud Plaintiffs from recovering their just and lawful damages.

167. Upon information and belief, Defendant Cameron received less than market value for the transferred assets.

168. Defendant Cameron's transferring of assets directly violates S.C. Code. Ann. § 27-23-10 ("Statute of Elizabeth") because he fraudulently conveyed assets with the intent to deceive creditors.

169. In the event that Defendant Cameron becomes insolvent, Plaintiffs are entitled to recover damages from any and all assets that Defendant Cameron transferred after December 17, 2023.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, having duly set forth their Complaint, pray for judgment against Defendants and ask that Plaintiffs be awarded actual, consequential, special, and punitive damages, plus prejudgment interest, in an amount to be shown and determined by a jury at trial, as well as attorneys' fees and costs, and such further relief as this Court deems just and proper.

Respectfully submitted,

[Signature Block on Separate Page]

Rhett Ricard

Rhett Ricard, SC Bar No. 102353
Nick Fowler, SC Bar No. 106908
MAYNARD NEXSEN PC
205 King Street, Suite 400
Charleston, SC 29401
843.740.1707

J. David Black, SC Bar No. 68499
MAYNARD NEXSEN PC
1230 Main Street, Suite 700
Columbia, SC 29201
803.540.2187

Attorneys for Plaintiffs
Bruce and Joanne Loveless

December 17, 2024
Charleston, South Carolina

EXHIBIT A

Sworn Affidavit of Matthew Wheeler

PERSONALLY APPEARED BEFORE ME, Matthew Wheeler, who, upon being duly sworn, deposes and says that:

1. My name is Matthew Wheeler. I am over eighteen years old, and I have personal knowledge of the matters set forth herein.

2. I am a resident of Chapin, South Carolina.

3. I am the owner of FLEX Supergym ("FLEX") at 1419 Chapin Road, Suite 60 Chapin, South Carolina.

4. Cameron Hinckley ("Cameron") is the son of Diana and Kris Hinckley ("Diana" and "Kris", respectively).

5. Cameron has never been a member at FLEX.

6. Cameron first visited FLEX on December 20, 2020. Cameron knocked on the door and had other members let him in.

7. Late December 2020, Cameron was using a guest pass and was working out at FLEX. During this time, Cameron intentionally damaged some of the FLEX equipment by aggressively slamming equipment into the floor.

8. After damaging the equipment, I advised Cameron that he could no longer come to FLEX.

9. On January 1, 2021, Cameron came back to FLEX. I met him at the door and reminded him that he was not allowed to work out at FLEX after the December incident. Cameron became visibly irritated, verbally threatened to break my ribs, and continued to attempt to hold the door open to force his way into FLEX as I was simultaneously attempting to pull the door closed. I managed to get FLEX's door shut and Cameron eventually left FLEX.

10. I contacted Chapin Police Department ("Chapin PD"). Chapin PD came to FLEX. I made a formal report and requested Cameron be put on trespass notice. Chapin PD could not find a driver's license number for Cameron, although Cameron consistently operated vehicles to harass me and FLEX by circling FLEX. Attached as **Exhibit **** is a true and accurate copy of the formal report I made with Chapin PD.

11. On January 6, 2020, I informed Chapin PD that Cameron made a fake Instagram account named "lmaoatmattwheeler" and threatened me through the account. I requested to pursue formal charges against Cameron. Attached as **Exhibit **** is a true and accurate copy of the direct message I received from @lmaoatmattwheeler Instagram account.

12. Cameron continued to make multiple Instagram profiles to harass me. One Instagram handle was named after a gun caliber: "notplaying223". Attached as **Exhibit **** is a true and accurate copy of the direct message I received from @notplaying223 Instagram account.

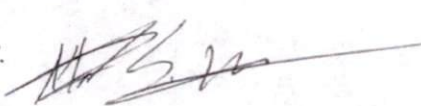
13. I contacted Diana regarding Cameron's concerning behavior including the stalking incidences at FLEX and on social media. Diana never responded to my concerns. Attached as **Exhibit **** is a true and accurate copy of the direct message sent on Facebook.

14. On August 19, 2021, Cameron sent me a message on Facebook asking if we could move on from the previous incidents. In my response to Cameron, I reiterated that we would continue to have no contact: "after damaging our equipment you threatened and stalked me on social media for months using accounts you named after various rifle calibers which I do not take lightly. Because you agreed to no further contact I agreed to not press charges and work with your family to get help for you". Attached as **Exhibit ***** is a true and accurate copy of the direct message between Cameron and myself.

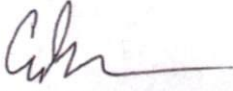
15. After the numerous incidents with Cameron, I spoke with another local gym owner in Chapin in order to put them on notice of Cameron's violent, threatening, and harassing behavior. Other gyms across the country have also experienced aggressive and erratic behavior from Cameron.

16. On November 18, 2022, Cameron returned to FLEX in a black truck. He proceeded to have a meltdown in the parking lot, which included Cameron screaming and undressing in FLEX's parking lot. After a FLEX employee and gym member informed me of this incident, I pulled the video surveillance of Cameron and a black truck at the door to FLEX on November 18, 2022 and again contacted Chapin PD. Attached as **Exhibit ****** is a true and accurate copy of the surveillance still photo from FLEX showing Cameron and the black truck he was operating at the FLEX front door camera on November 18, 2022.

FURTHER AFFIANT SAYETH NOT.


Matthew Wheeler

10 day of December 2024.



Notary Public for the State of South Carolina

My Commission expires: 3/20/27

2

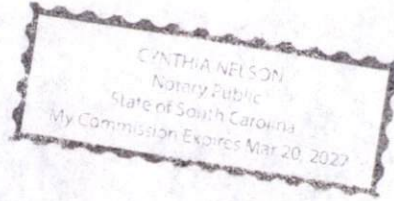


Exhibit **

AGENCY I.D.
SC0320600

CHAPIN POLICE DEPARTMENT
INCIDENT REPORT

CASE NUMBER

21-0001

NCIC

INQ. ENTD.

INCIDENT TYPE		COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM
1. INF - TRESPASS NOTICE		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	20		<input type="checkbox"/> Individual <input checked="" type="checkbox"/> Business <input type="checkbox"/> Financial Inst. <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.
2.		<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			
3.		<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			
INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER): 1419 CHAPIN RD, CHAPIN SC				ZIP CODE 29036	WEAPON TYPE	
INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	LOCATION NO.	
01/01/2021	1206		01/01/2021	1245	29036	
COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX
WHEELER, MATTHEW STEVEN				J	S	O
ADDRESS		CITY		STATE	ZIP CODE	LOCATION NO.
506 OLD SAYBROOK DR		COLUMBIA		SC	29210-5031	
VICTIM'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX
FLEX SUPERGYM				J	S	O
HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.		
ADDRESS		CITY		STATE	ZIP CODE	LOCATION NO.
1419 CHAPIN RD #60		CHAPIN		SC	29036	
VISIBLE INJURY (VICT. 1) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO EXPLAIN --						
VICTIM (NO. 1) USING: ALCOHOL: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK.						
<input type="checkbox"/> TWO-MAN VEH. <input type="checkbox"/> ONE-MAN VEH. <input type="checkbox"/> DEFECTIVE/SPLASMT. <input type="checkbox"/> OTHER <input type="checkbox"/> ALONE <input type="checkbox"/> ASSISTED						
J - This Jurisdiction S - State O - Out of State U - Unknown						
SUBJECT NAME (LAST, FIRST, MIDDLE)		RACE	SEX	AGE	ETH.	DATE OF BIRTH
HINCKLEY, CAMERON THOMAS		W	M	22	N	
FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.						
ADDRESS		CITY		STATE	ZIP CODE	LOCATION NO.
5301 WILLOW LN		COLLEYVILLE		TX	76034	
SUBJECT (NO. 1) USING: ALCOHOL: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK.		ARRESTED NEAR OFFENSE SCENE <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		DATE/TIME OF OFFENSE		DATE/TIME OF ARREST
DRUGS: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK. TYPE:		TOTAL # ARRESTED 0		01/01/2021		1206

Offenses:
TRESPASS NOTICE

On the above date and time I was dispatched to 1419 Chapin Rd (Flex Supergym) in reference to threats. I arrived on scene and spoke to complainant Matt Wheeler who owns the business. He advised that Thomas Cameron had come in on 12/20/20 and 12/21/2020 by knocking on the door and having other members let him in. Mr. Wheeler advised me that Mr. Cameron doesn't have a membership there. He spoke to Mr. Cameron who advised he was in town visiting family. Mr. Wheeler gave him a temporary free pass on 12/22/2020 so he could use the gym. Mr. Wheeler advised on that Mr. Cameron was working out since then and damaged some of the equipment when dropping/tossing one of the barbells with plates on it. He advised Mr. Cameron he couldn't use the gym anymore. Today at approximately 1206 Mr. Cameron came back to the gym wanting to work out. Mr. Wheeler went to the door and advised him he couldn't. He advised Cameron got irate and verbally threatened to break his ribs. Mr. Wheeler pulled the door shut and eventually Mr. Cameron left. Mr. Wheeler would like Mr. Cameron placed on trespass notice. I will attempt to contact Mr. Cameron and advise him. Mr. Wheeler advised Mr. Cameron said he was going back home tomorrow. Case continues...

Print Date: 01/10/2023 04:47:34 PM		JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY		JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY	
P	TYPE (GROUP)				TOTAL VALUE
R	Burned				
O	Count/Forged				
P	Dest/Damaged				
E	Recovered				
R	Seized				
T	Stolen				
Y	Unknown				
SUBJECT IDENTIFIED		SUBJECT LOCATED		<input type="checkbox"/> ACTIVE <input checked="" type="checkbox"/> ADM. CLOSED	
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		<input type="checkbox"/> ARRESTED UNDER 18 <input type="checkbox"/> EX-CLEAR UNDER 18	
				<input type="checkbox"/> ARRESTED 18 AND OVER <input type="checkbox"/> EX-CLEAR 18 AND OVER	
REASON FOR EXCEPTIONAL CLEARANCE: 1. <input type="checkbox"/> OFFENDER DEATH 2. <input type="checkbox"/> NO PROSECUTION 3. <input type="checkbox"/> EXTRADITION DENIED 4. <input type="checkbox"/> VICTIM DECLINES COOPERATION 5. <input type="checkbox"/> JUVENILE - NO CUSTODY					
REPORTING OFFICER(S)		DATE	UNIT NUMBER	APPROVING OFFICER	DATE
1ST SGT T FRICK		01/01/2020	172		
		FOLLOW-UP INVESTIGATION OFFICER			
		<input type="checkbox"/> YES <input type="checkbox"/> NO			

ELECTRONICALLY FILED - 2024 Dec 17 7:46 PM - LEXINGTON - COMMON PLEAS - CASE#2024CP3205200

INCIDENT REPORT SUPPLEMENTAL

Page #: 1

Case Number: 21-0001

Officer: 0008 FRICK, T

Date Entered/Changed: 01/06/2021

Reviewer:

Review Date:

DETAILED STATEMENT OF INVESTIGATION: 01/06/2020: I observed a message that was left on my office phone 01/05/2020 for Mr. Wheeler. I returned his call and he advised the subject had made a fake instagram account (lmaoatmattwheeler), threatening him and he wants to pursue charges. I will attach the screenshot of the instagram to the report. Case continues....

INCIDENT REPORT SUPPLEMENTAL

Page #: 1

Case Number: 21-0001

Officer: 0008 FRICK, T

Date Entered/Changed: 01/15/2021

Reviewer:

Review Date:

DETAILED STATEMENT OF INVESTIGATION: 01/15/2020: I have attempted to contact Mr. Wheeler multiple times in reference to getting written statements and the video footage from the incident. I have left messages and he has not returned my calls. At this time this case is closed due to the victim not cooperating. I also could not get the suspect to contact me back in reference to advising him he is on trespass notice.

ELECTRONICALLY FILED - 2024 Dec 17 7:46 PM - LEXINGTON - COMMON PLEAS - CASE#2024CP3205200

INCIDENT REPORT SUPPLEMENTAL

Page #: 1

Case Number: 21-0001

Officer: 0008 FRICK, T

Date Entered/Changed: 01/19/2023

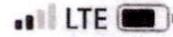
Reviewer:

Review Date:

DETAILED STATEMENT OF INVESTIGATION: 01/19/2023 at approximately 1400 Captain Galinski and I met with Mr. Wheeler at the Police Department. Mr. Wheeler advised that he didn't receive any calls from me at the conclusion of the case and he believed I was attempting to call the suspect instead of him. As we spoke about the incident I also advised Mr. Wheeler that I discussed the case with the Chief at the time and it was determined the criteria didn't meet the statute to pursue charges. Mr. Wheeler was advised to pursue a restraining order and send a certified letter to the suspect for no contact. This meeting was also in reference to Case#22-0641.

ELECTRONICALLY FILED - 2024 Dec 17 7:46 PM - LEXINGTON - COMMON PLEAS - CASE#2024CP3205200

11:35 ↗



Imaoatmattwheeler



Imaoatmattwheeler

Instagram

0 followers · 0 posts

You don't follow each other on Instagram

New Instagram account

[View Profile](#)

Friday 12:51 PM

Hey brother. I left some nice google reviews :) This is what happens when you fuck with war vets.

I know everything about you so watch your step

Accept message request from
Imaoatmattwheeler?

If you accept, they will also be able to video chat with you and see info like your Activity Status and when you've seen messages.

Block

Delete

Accept

4:51



< lmaoatmattwhee...

0 followers · 0 posts

You don't follow each other on Instagram

New Instagram account

[View Profile](#)

Friday 12:51 PM

Hey brother. I left some nice google reviews :) This is what happens when you fuck with war vets.

I know everything about you so watch your step

11:43 AM

Understood. I guess I should have Chapin PD upgrade the charge to communicating threats of violence then. Doesn't seem like a trespass order was enough.

Photo

[Get Vanish Mode](#)

Message...



12:26 ↗



notplaying223



notplaying223

Instagram

0 followers · 0 posts

You don't follow each other on Instagram

New Instagram account

[View Profile](#)

12:24 PM



Accept message request from **notplaying223**?

If you accept, they will also be able to video chat with you and see info like your Activity Status and when you've seen messages.


Block

Delete

Accept

12:26 ↵



<  notplaying223



What the FUCK are you doing
commenting on my photo

If I so much as SUSPECT you do
ANYTHING to fuck with me or my
business between now and the
time the casket drops there will
be AGGRESSIVE and
DEVASTATING consequences for
you and your business

Accept message request from **notplaying223?**

If you accept, they will also be able to video chat with you
and see info like your Activity Status and when you've seen
messages.

Block

Delete

Accept

12:33



notplaying223



BE AGGRESSIVE and
DEVASTATING consequences for
you and your business

I am in contact with your family
to try to get you the help you
need. We will work with law
enforcement to find the best
solution. Any messages moving
forward will be used as evidence.

If you say shit to anyone you'll
get 100 bad reviews. Otherwise
you win and this is DONE.

End of discussion



Goodbye

The best thing to do at this point
is to not have any contact at all.
Move on with your life and stop
stalking my profiles. I can assure
you I never want anything to do
with you again.

Goodbye



Message...



8:29



Diana Spruell Hinckley



Studied at BYU

FRI 10:33 PM

Hi Diana,
I apologize that I am having to message you under these circumstances, but I was hoping you could help me with a legal situation I am having with Cameron who I believe is your son. I am the owner of Flex SuperGym. While he was in my gym he threatened me and has since been cyber stalking my social media profiles, sending further threatening messages. I am at the point that I will need to take serious legal action with the help of Chapin PD if he does not stop. Can we please meet to discuss some options to get him some help before he escalates the situation? I would like to see him choose to leave us alone, but it seems like I might need help from his loved ones to make that happen.



Exhibit ***

2:57



Thomas Hinckley



06/14/2021, 8:31 PM

hey brother you know what I wanted to go ahead and reach out now I know you despise and probably hate me as much as it is probably likely to do so

for the record this is a message for Mr. Matt Wheeler

with that said I wanted to reach out and ask you whether we can make it a clean slate and try again



some time back I had come in and i was lunging and dropped the weight also I felt like you were being sort of rude when you kicked me off a machine anyways do you wanna give me a call and we can talk this out I know when I was lunging I dropped the weght and it pissed you off and anything that happened after that lets just say fuck it because thats what it stemmed from lets work this out



08/19/2021, 3:56 PM



Aa



2:57



Thomas Hinckley



08/19/2021, 3:56 PM

I have no hate or anger towards you, but I do have a business to run so I cannot spend any more time on this matter. After damaging our equipment you threatened me and stalked me on social media for months using accounts you named after various rifle calibers which I do not take lightly. Because you agreed to no further contact I agreed to not press charges and work with your family to get help for you. I really do wish the best for you, I also worked with some really amazing groups at Fort Bragg who were dedicated to helping vets with PTSD. I remember you mentioned you were a vet so if you ever need me to have someone reach out, then that offer will always be on the table. Although I cannot meet with you or have you back in the gym it is simply to protect myself legally, I have no room in my life for hate so we absolutely have a clean slate and I wish you the best. -Matt



Aa



2:57



Thomas Hinckley



rifle calibers which I do not take lightly. Because you agreed to no further contact I agreed to not press charges and work with your family to get help for you. I really do wish the best for you, I also worked with some really amazing groups at Fort Bragg who were dedicated to helping vets with ptsd. I remember you mentioned you were a vet so if you ever need me to have someone reach out, then that offer will always be on the table. Although I cannot meet with you or have you back in the gym it is simply to protect myself legally, I have no room in my life for hate so we absolutely have a clean slate and I wish you the best. -Matt

SEP 12 AT 5:09 PM



Hey is this a lifetime dont come to my gym or are you ready to put this behind us? wwjd



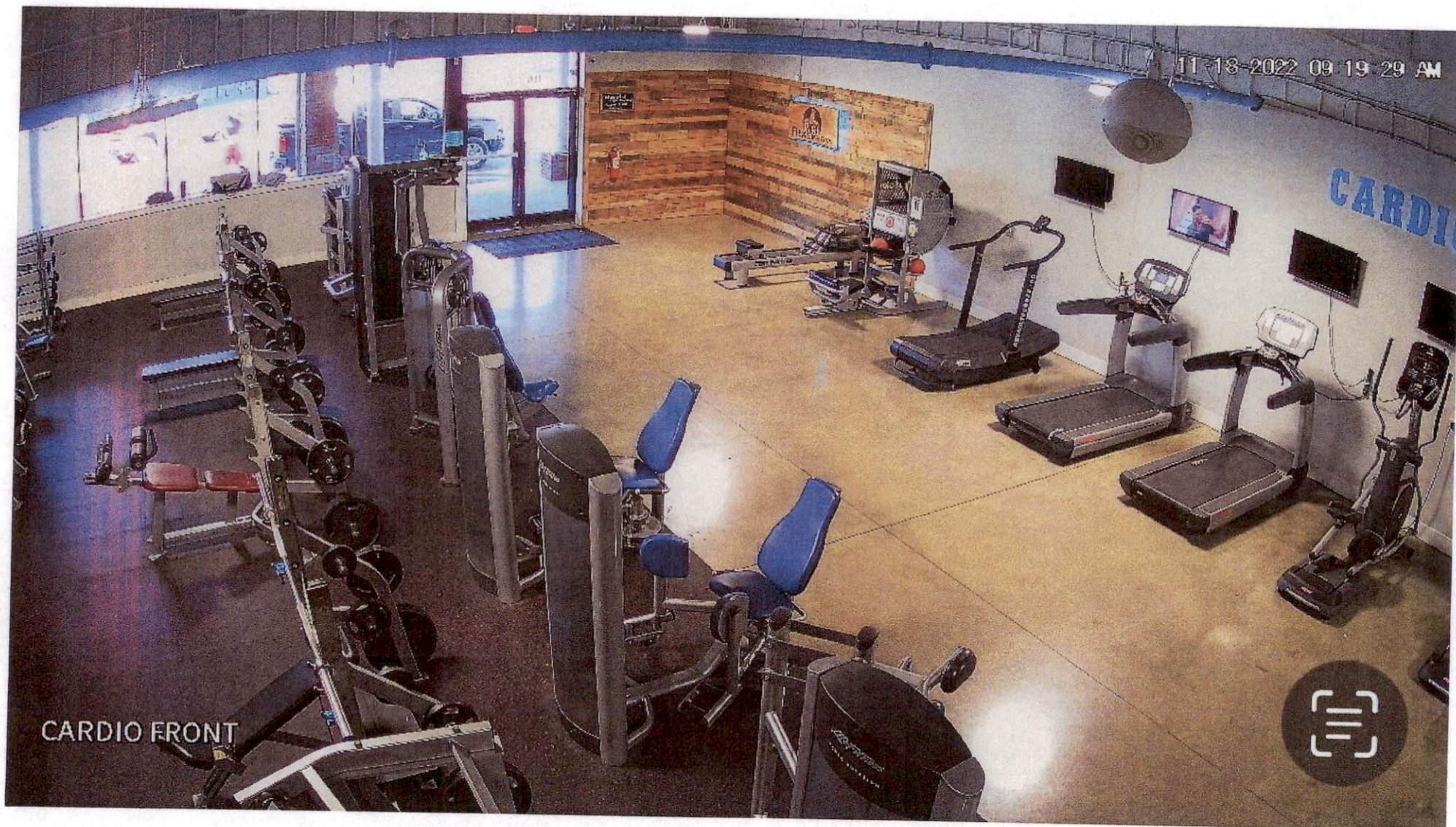
Oh nvm I just read that. No worries. I won't reach out again.



Aa



Exhibit ****



11-18-2022 09:19:29 AM

CARDIO

CARDIO FRONT

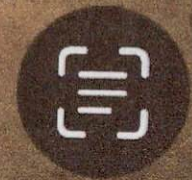


EXHIBIT B

Sworn Affidavit of William "Bill" Kerchusky

PERSONALLY APPEARED BEFORE ME, William "Bill" Kerchusky, who, upon being duly sworn, deposes and says that:

1. My name is Bill Kerchusky. I am over eighteen years old, and I have personal knowledge of the matters set forth herein.

2. I reside at 1037 Point View Road Chapin, South Carolina.

3. I am a resident of Chapin, South Carolina.

4. While residing at my property, I have had multiple encounters with Diana Hinckley ("Diana") and Kris Hinckley ("Kris") and only the encounter described below with Cameron Hinckley ("Cameron").

5. Diana and Kris own a property adjacent to my residence at 1051 Point View Road (the "Hinckley Residence").

6. Cameron is the son of Diana and Kris and resided with his parents at the Hinckley Residence at the time of the incident alleged herein.

7. On October 5, 2023, I returned home from a four-hour trip towing a boat behind my truck. When I parked my truck in my driveway, and as soon as my feet hit the ground, I heard two gunshots coming from the shared property line, approximately thirty feet away. Upon hearing the gunshots, I immediately dropped to the ground on my driveway and crawled back beside my truck and peeked out. I saw a young man, who I shortly learned was Cameron, holding a rifle pointed toward the ground in front of his father, Kris.

8. I could hear yelling, but I could not understand the words. Cameron was visibly irate during his argument with his father.

9. Cameron then ran off towards Loveless Lane at the edge of the woods towards an

approximately six-foot tall fence. Cameron attempted to scale the fence with the firearm but was unsuccessful. Cameron was yelling and cursing at the fence.

10. Cameron was yelling from a distance that "you damn democrats aren't going to take my guns."

11. I approached Kris and asked if he was alright. Kris responded that he was alright but he looked visibly shaken. Kris said that Cameron was the last one of nine children, and that he was going into the Navy at the end of the week. He stated that he, Cameron, has been a problem child.

12. When I approached Kris, he was already on the phone with 911. I heard Kris tell the 911 dispatcher to instruct the responding officers to not shoot his son when they arrive.

13. After the 911 call, Cameron then began running towards me at the edge of the woods at the fence line pointing his firearm, screaming "I'm gonna kill you." I immediately ran behind my truck and boat to use as a shield as I attempted to quickly get inside my home. I then got in my home and called 911 and asked the dispatcher to send the police to Loveless Lane. The dispatcher advised me to lay on the floor in my home and not look out my windows. I waited in my home until the police arrived at the Hinckley Residence.

14. The Lexington County Sheriff's Department never came to my home to take a statement.

15. About an hour after the police left the Hinckley Residence, Kris approached me outside my home. He stated he was gathering all the guns at the fence/woods area to give to a friend in Chapin.

16. After my neighbor, Bruce Loveless, was stabbed by Cameron, I followed up with the Lexington County Sheriff's Department regarding the October 5, 2023 incident. To date, they have not called me back.

FURTHER AFFIANT SAYETH NOT.

William "Bill" Kerchusky
William "Bill" Kerchusky

SWORN TO BEFORE ME this
16th day of December 2024.

Rosa M. Miller
Notary Public for the State of South Carolina
My Commission expires: April 27, 2026



STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Docket No.: 2024-CP-32-05200
BRUCE AND JOANNE LOVELESS,)	
)	
Plaintiff,)	
)	
v.)	DEFENDANTS KRIS AND DIANA
)	HINCKLEY'S NOTICE
)	OF MOTION
CAMERON HINCKLEY, KRIS)	AND MOTION FOR PROTECTIVE
HINCKLEY, AND DIANA HINCKLEY,)	ORDER
)	
Defendants.)	

To: David Black, Esquire, Rhett Ricard, Esquire, and Nick Fowler, Esquire, Counsel to Plaintiffs:

YOU WILL PLEASE TAKE NOTICE that Defendants Kris and Diana Hinckley (“Defendants”), by and through their undersigned counsel, will move before the Court as soon as counsel may be heard for an Order pursuant to Rule 26(c) of the South Carolina Rules of Civil Procedure for a protective Order or, in the alternative, an Order that the discovery not be had, or be had under only specified terms and conditions. The grounds for this motion are as follows:

1. Defendants Motion to Stay this matter until the conclusion of the corresponding criminal matter is still pending before this Court.
2. Defendant Cameron Hinckley’s Motion to Strike allegations of Plaintiffs’ Complaint is set to be heard on August 25, 2025.
3. Defendant Cameron Hinckley’s Motion to Strike relates directly to specific Requests for Admission, Requests for Production, and Interrogatories propounded by Plaintiffs.
4. Plaintiffs’ Requests for Admission to Defendant Diana Hinckley exceed the amount allowed pursuant to Rule 36 of the South Carolina Rules of Civil Procedure.

5. Defendants respectfully request that a protective Order under Rule 26(c) of the South Carolina Rules of Civil Procedure protecting Defendants Kris and Diana Hinckley from being compelled to respond to Plaintiffs Requests for Admission, Requests for Production, and Interrogatories until the Court has the opportunity to rule on Defendants Kris and Diana Hinckley's Motion to Stay and Defendant Cameron Hinckley's Motion to Strike.
6. Defendants respectfully request that the discovery only be had once the aforementioned Motion to Stay and Motion to Strike have been ruled on by this Court.
7. In the alternative, Defendants respectfully request that the discovery propounded by Plaintiffs not be had.
8. Defendants reserve the right to supplement this Motion with additional grounds, to the extent that they arise prior to a hearing on this matter.
9. Defendants' counsel certifies that consultation prior to filing this motion would serve no useful purpose in accordance with Rule 11(a) of the South Carolina Rules of Civil Procedure.

This Motion is based upon the South Carolina Rules of Civil Procedure, the applicable law, any memoranda of law which may be submitted at or before a hearing on this matter, and any other matters the Court may permit to be presented.

TURNER PADGET GRAHAM & LANEY, P.A.

/s/Jacob M. Thompson, III

Jacob M. Thompson III

SC Bar No. 105399

Post Office Box 1473

Columbia, South Carolina 29202

Direct: 803-227-4323

Fax: 803-400-1502

JThompsonIII@turnerpadget.com

ATTORNEYS FOR DEFENDANT

Columbia, South Carolina
August 19, 2025

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

IN THE COURT OF COMMON PLEAS

Case No.2024-CP-32-05200

Bruce and Joanne Loveless,
Plaintiffs,

**PLAINTIFFS' MOTION TO COMPEL
AND FOR SANCTIONS AGAINST
DEFENDANTS KRIS AND DIANA
HINCKLEY**

vs.

Cameron Hinckley, Kris Hinckley and Diana
Hinckley,
Defendants.

Plaintiffs Bruce and Joanne Loveless (“Plaintiffs”), by and through their undersigned counsel, pursuant to Rules 11, 26, 33, 34, 36, and 37 of the South Carolina Rules of Civil Procedure, move this Court to compel Defendants Kris and Diana Hinckley (collectively “Parent Defendants”) to answer and respond to Plaintiffs’ Interrogatories and Requests for Production; order that Plaintiffs’ Requests for Admission be deemed admitted; and award sanctions against Parent Defendants. The grounds for this Motion are as follows:

1. This action stems from Defendant Cameron Hinckley (“Defendant Cameron”) and Defendant Diana Hickley (“Defendant Diana”) trespassing into Plaintiffs’ home and Defendant Cameron brutally stabbing Mr. Loveless eleven (11) times on December 17, 2023 (the “Attack”).
2. Plaintiffs filed suit against Defendants on December 17, 2024.
3. Since this action has commenced, Parent Defendants’ tactics in defending this suit are simple: deny Plaintiffs’ access to justice by delaying and disrupting these proceedings.
4. This Motion outlines the various delay tactics used by Parent Defendants in explaining why the Court should grant this Motion to Compel and for Sanctions is warranted under these circumstances.

California Law-Enforcement Subpoenas

5. Plaintiffs issued six subpoenas to California law enforcement agencies, requesting information and documentation relating to Defendant Cameron having similar incidents as the Attack in those California jurisdictions.

6. Despite their obvious lack of standing to object to subpoenas for records concerning the criminal conduct of their adult son, Parent Defendants sent objection letters to all six agencies.

7. While most of the agencies saw through Parent Defendants' meritless position, their improper objections caused unnecessary delay in Plaintiffs' obtaining relevant and necessary evidence.

Church of Latter-Day Saints Subpoena

8. Based on obtained information, Plaintiffs issued a subpoena to the Church of Latter-Day Saints in Irmo, South Carolina (the "Church").

9. Parent Defendants, again, sent an objection letter to the Church and, this time, filed a motion to quash and/or for protective order on March 4, 2025 ("Motion to Quash").

10. At the hearing on the Motion to Quash, Parent Defendants argued Plaintiffs should have obtained discovery from them before issuing a subpoena to the Church. Hearing Transcript of Apr. 16, 2025 at 13:10-12 ("We have not received one bit of written discovery from the plaintiffs yet. We have not been deposed."); *see also id.* at 14:17-18 ("I can't emphasize this enough, Your Honor. This [the subpoena to the Church] is the very first discovery device we received[.]")

11. Seeing through Parent Defendants' thinly veiled argument, the Court largely denied their Motion to Quash, compelling the Church to respond to six of the seven document requests.

Motion to Stay

12. Continuing their delay tactics, Parent Defendants filed for a Motion to Stay on April 29, 2025 (“Motion to Stay”). Parent Defendants contended that Plaintiffs, who are elderly, should be forced to wait for justice until some undetermined date in the future when the criminal proceedings against Defendant Cameron are completed.

13. Parent Defendants’ Motion to Stay was heard on July 29, 2025. Despite being the party to file the Motion to Stay, Parent Defendants again sought to prolong the proceedings by requesting additional time to file a memorandum in support of their motion after the hearing.

14. Judge Rivers denied Parent Defendants’ Motion to Stay on August 25, 2025.

15. Notwithstanding the additional time to file their post-hearing memorandum in support, Parent Defendants again attempted to prolong this litigation by filing a Motion to Reconsider on September 3, 2025.

16. In response to Parent Defendants’ Motion to Reconsider, Judge Rivers found “no compelling argument to require that the civil matters be stayed,” highlighting that this was “not an unusual situation.” A true and accurate copy of Judge River’s Form 4 order is attached hereto as **Exhibit A**.

17. Judge Rivers held that Parent Defendants’ argument to stay had “little to no merit.” Ex. A, p. 2.

Defendant Cameron’s Motion to Strike

18. While represented by different counsel, Defendant Cameron filed a Motion to Strike on July 17, 2025 (“Motion to Strike”), in lieu of answering Plaintiffs’ Complaint.

19. Defendant Cameron’s Motion to Strike was heard and denied on August 25, 2025.

Parent Defendants' Refusal to Respond to Plaintiffs' Requested Discovery

20. Plaintiffs issued Requests for Admissions, Interrogatories, and Requests for Production (collectively the "Discovery Requests") pursuant to Rules 26, 33, 34, and 36 of the South Carolina Rule of Civil Procedure on July 21, 2025.¹

21. Instead of making a good faith effort in responding to discovery, Parent Defendants, again, unjustifiably delayed this litigation by filing a frivolous and meritless Motion for Protective Order on August 20, 2025 ("Motion for Protective Order"), the very day their responses were due. Moreover, Parent Defendants filed the Motion without consulting Plaintiffs, in violation of the duty to consult pursuant to Rule 11 of the South Carolina Rules of Civil Procedure.

22. The basis for Parent Defendants' Motion for Protective Order was the pending ruling on the Motion to Stay and Motion to Strike.

23. Parent Defendants used the Motion for Protective Order to avoid their obligation to respond in good faith to the Discovery Requests. Parent Defendants:

- a. individually objected to all of Plaintiffs' requests for admissions, neither admitting or denying them, citing their Motion for Protective Order and the inadvertent twenty first request to Defendant Diana; and
- b. failed to answer or respond to any of Interrogatories or Requests for Production.

24. After the Motion to Strike and Motion to Stay were denied, Plaintiffs' counsel met and conferred with Parent Defendants' counsel on September 9, 2025, highlighting Parent Defendants' position in their Motion for Protective Order was moot and asking Parent Defendants to timely respond to Plaintiffs' Discovery Requests.

¹ Plaintiffs inadvertently included 21 Requests for Admission to Defendant Diana. *See* Rule 36(c), SCRPC. Plaintiffs have requested Defendant Dianna respond only to Requests 1-20.

25. The following day, Plaintiffs specifically requested Parent Defendants to respond to Plaintiffs' Discovery Requests on or before September 12, 2025.

26. On September 12, 2025, Parent Defendants informed Plaintiffs that they could not respond to the Discovery Requests, preposterously claiming they had "not had time to review" them. Parent Defendants took this astonishing position despite having received the Discovery Requests *six weeks* earlier, on July 21, 2025, and notwithstanding that they were cited to in Parent Defendants' Motion to Stay.

27. To date, Parent Defendants have failed to answer or respond to Plaintiffs' Discovery Requests.

28. Despite having previously complained about Plaintiffs serving subpoenas on third parties before taking discovery from them, Parent Defendants are unjustifiably refusing and failing to respond to the Discovery Requests. Parent Defendants' motives are once again clear: delay and disrupt Plaintiffs' access to justice by continually and frivolously prolonging this litigation.

29. Pursuant to Rules 11, 26, 33, 34, 36, and 37 of the South Carolina Rules of Civil Procedure, Plaintiffs ask this Court to:

- 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; and
- Impose Sanctions against Parent Defendants, including the costs associated with this Motion, for their repeated frivolous delays in this litigation.

30. Plaintiffs' Motion to Compel and for Sanctions will be further supported by a forthcoming Memorandum of Law.

Based on the foregoing and pursuant to Rules 11, 26, 33, 34, 36, and 37 of the South Carolina Rules of Civil Procedure, Plaintiffs respectfully request this Court grant the relief requested herein.

Respectfully submitted,

s/ Nick Fowler

Rhett D. Ricard, SC Bar No. 102353
Nick Fowler, SC Bar No. 106908
MAYNARD NEXSEN PC
205 King Street, Suite 400
Charleston, SC 29401
843.740.1707
rricard@maynardnexsen.com
nfowler@maynardnexsen.com

J. David Black, SC Bar No. 68499
MAYNARD NEXSEN PC
1230 Main Street, Suite 700
Columbia, SC 29201
803.540.2187
dblack@maynardnexsen.com

*Attorneys for Plaintiffs
Bruce and Joanne Loveless*

September 16, 2025
Charleston, South Carolina

Exhibit A

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), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled);
 Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; 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:

Defendant filed a motion to reconsider the denial of stay of this litigation pursuant to Rule 54(b) and Rule 59(e). This motion briefly restates defendant's arguments for a stay and indicates that defendant was not aware of the exact basis of the denial. To clarify, this court heard arguments from all counsel and reviewed the filed memorandums presented in this matter. Furthermore, counsel was allowed additional time after the hearing to present argument. The court understands that how the defendant would prefer to proceed but finds no compelling argument to require that the civil matter be stayed during the pendency of the collateral criminal proceedings. The court is aware that the two cases do impact each other. This is not an unusual situation in our court system. It arises routinely in actions involving alleged abuse or neglect of children. It is not uncommon in our civil system as alleged acts may be crimes as well as torts. The party in the criminal

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 09/05/2025 .

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.

action is the State of South Carolina, not the plaintiffs. There are different burdens of proof in each action.

This court disagrees with defendant as to items 1-5 on page 3 of the motion, referring to the Memorandum in Support. The court sees little to no merit as to the fact the criminal matter may make determinations that would have an impact on the civil case requiring or justifying a stay in the civil action. As stated, that is not an unusual situation in our court system.

IT IS SO ORDERED.



Lexington Common Pleas

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

IT IS SO ORDERED.

/s/ Hon. Martha M. Rivers (2788)

Electronically signed on 2025-09-05 10:23:57 page 3 of 3

ELECTRONICALLY FILED - 2025 Sep 05 10:46 AM - LEXINGTON - COMMON PLEAS - CASE#2024CP3205200
ELECTRONICALLY FILED - 2025 Sep 16 5:38 PM - LEXINGTON - COMMON PLEAS - CASE#2024CP3205200

Murray, Diana

From: Moore, Melaina J.
Sent: Thursday, October 23, 2025 6:49 PM
To: dblack@maynardnexsen.com; Nick Fowler
Cc: Thompson, Jacob M.; Bess DuRant; Peele III, Robert M.; Brown, Renee G; derek@lawconnell.com; ecb@ecboggsllaw.com; bphubacher@wjcblaw.com
Subject: Bruce and Joanne Loveless v. Cameron Hinckley, Kris Hinckley, and Diana Hinckley - Defendants Discovery Responses
Attachments: Defendant Diana Hinckley's Discovery Responses to Plaintiffs - Loveless v. Hinckley.pdf; Defendant Kris Hinckley's Discovery Responses to Plaintiffs - Loveless v. Hinckley.pdf; Diana Hinckley's Amended Responses to RFA's.pdf; Kris Hinckley's Amended Responses to RFA's.pdf

Good evening,

Please find attached Defendant Diana and Kris Hinckley's discovery responses to Plaintiffs' Interrogatories and Requests for Production. Also attached are Defendants Diana and Kris Hinckley's Amended Responses to Plaintiffs' Requests to Admit for your review. Below is a link with document production, which is set to expire on **11/13/25**.

[REDACTED]

Please let us know if this resolves the motion that is scheduled for Tuesday, October 28.

Thank you!
Melaina

Turner Padget
Melaina J Moore
Paralegal
PO Box 1473 | Columbia, SC 29202
1901 Main Street, Suite 900 | Columbia, SC 29201
803-227-4232 | Fax 803-400-1458
mjmoore@turnerpadget.com
[vCard](#) | [Location](#)

EXHIBIT B

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	FOR THE ELEVENTH JUDICIAL CIRCUIT
)	
Bruce and Joanne Loveless,)	Civil Action No.: 2024-CP-32-05200
)	
Plaintiffs,)	
)	
vs.)	
)	ANSWER OF KRIS HINCKLEY AND
Cameron Hinckley, Kris Hinckley, and)	DIANA HINCKLEY
Diana Hinckley,)	
)	
Defendants.)	
)	
)	

Defendants Kris Hinckley and Diana Hinckley (“Defendants” or “Hinckleys”) hereby answer the Complaint in this action and deny each and every allegation thereof not hereinafter specifically admitted, qualified, or explained, and further allege as follows:

FOR A FIRST DEFENSE

1. Defendants admit, upon information and belief, the allegations of paragraph 1 of the Complaint.
2. Defendants admit, upon information and belief, the allegations of paragraph 2 of the Complaint.
3. Defendants admit, upon information and belief, the allegations of paragraph 3 of the Complaint.
4. Defendants admit the allegations of paragraph 4 of the Complaint, upon information and belief.
5. Defendants admit the allegations of paragraph 5 of the Complaint.
6. Defendants admit the allegations of paragraph 6 of the Complaint.
7. Responding to paragraph 7 of the Complaint, Defendants admit that they reside at

1051 Point View Road in Chapin, South Carolina. Defendants deny the remaining allegations of paragraph 7 of the Complaint.

8. Responding to paragraph 8 of the Complaint, Defendants admit that Cameron is their son. Defendants deny the remaining allegations of paragraph 8 of the Complaint, as stated.

9. The allegations of paragraph 9 of the Complaint constitute a conclusion of law which requires no response from Defendants. To the extent a response is necessary, Defendants crave reference to all applicable statutory and caselaw regarding the same, deny the conclusion, and demand strict proof of such a conclusion.

10. The allegations of paragraph 10 of the Complaint constitute a conclusion of law which requires no response from Defendants. To the extent a response is necessary, Defendants crave reference to all applicable statutory and caselaw regarding the same, deny the conclusion, and demand strict proof of such a conclusion.

11. Defendants deny the allegations of paragraph 11 of the Complaint.

12. Defendants admit the allegations of paragraph 12 of the Complaint.

13. Defendants deny the allegations of paragraph 13 of the Complaint.

14. Defendants admit the allegations of paragraph 14 of the Complaint.

15. Responding to the allegations of paragraph 15 of the Complaint, Defendants admit that Cameron lived with them when he was a minor. Defendants deny the remaining allegations of paragraph 15 of the Complaint.

16. Defendants deny the allegations of paragraph 16 of the Complaint.

17. Responding to paragraph 17 of the Complaint, Defendants admit that Cameron has been in trouble with the law. Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations (other than Cameron has been in trouble with

the law), and therefore, they are denied, and demand strict proof thereof.

18. Defendants deny the allegations of paragraph 19 of the Complaint.

19. Responding to paragraph 18 of the Complaint, Defendants admit there was an incident involving Cameron at FLEX, upon information and belief. Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations, and therefore, they are denied, and demand strict proof thereof.

20. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 20 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

21. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 21 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

22. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 22 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

23. Defendants deny the allegations of paragraph 23 of the Complaint.

24. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 24 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

25. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 25 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

26. Defendants are without knowledge or information sufficient to form a belief as to

the truth of the allegations of paragraph 26 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

27. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 27 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

28. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 28 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

29. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 29 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

30. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 30 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

31. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 31 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

32. Defendants admit the allegations of paragraph 32 of the Complaint.

33. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 33 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

34. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 34 of the Complaint, and therefore, they are denied, and

demand strict proof thereof.

35. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 35 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

36. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 36 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

37. Responding to paragraph 37 of the Complaint, Defendants admit that Diana traveled to California to see Cameron. Cameron chose to travel to Chapin, South Carolina to stay with his parents for a period of time to recover from physical conditions he suffered from being homeless in California. Defendants deny the remaining allegations of paragraph 37 of the Complaint, as stated.

38. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 38 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

39. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 39 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

40. Responding to paragraph 40 of the Complaint, Defendants admit that the Lexington County Sheriff's Department ("LCSD") was dispatched to the Hinckley Residence regarding an incident involving Cameron and Kris. Defendants deny the remaining allegations of paragraph 40 of the Complaint.

41. Defendants admit the allegations of paragraph 41 of the Complaint.

42. Responding to paragraph 42 of the Complaint, Defendants admit that Cameron suffers from mental issues. Defendants deny the remaining allegations of paragraph 42 of the Complaint.

43. Defendants admit the allegations of paragraph 43 of the Complaint.

44. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 44 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

45. Responding to paragraph 45 of the Complaint, Defendants admit that Kris and Mr. Kerchusky spoke after Cameron's incident. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 45 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

46. Defendants deny the allegations of paragraph 46 of the Complaint.

47. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 47 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

48. Responding to paragraph 48 of the Complaint, Defendants admit that they were advised by law enforcement to remove all firearms from the property and keep them away from Cameron. Defendants further admit that they removed all firearms from the property. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 48 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

49. Responding to paragraph 49 of the Complaint, Defendants cannot recall any specific conversations soon thereafter the incident. Thus, Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 49 of the

Complaint, and therefore, they are denied, and demand strict proof thereof.

50. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 50 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

51. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 51 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

52. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 52 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

53. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 53 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

54. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 54 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

55. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 55 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

56. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 56 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

57. Defendants deny the allegations of paragraph 57 of the Complaint.

58. Responding to paragraph 58 of the Complaint, Defendants admit that Cameron went to Mr. Loveless. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 58 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

59. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 59 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

60. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 60 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

61. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 61 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

62. Responding to paragraph 62 of the Complaint, Defendants admit Cameron stabbed Mr. Loveless 11 times, upon information and belief, with a knife. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 62 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

63. Defendants deny the allegations of paragraph 63 of the Complaint.

64. Responding to paragraph 64 of the Complaint, Defendants admit that Cameron returned to Defendants' home after he stabbed Mr. Loveless. Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 64 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

65. Defendants admit the allegations of paragraph 65 of the Complaint.

66. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 66 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

67. Defendants deny the allegations of paragraph 67 of the Complaint.

68. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 68 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

69. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 69 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

70. Defendants deny the allegations of paragraph 70 of the Complaint.

71. Defendants admit the allegations of paragraph 71 of the Complaint.

72. Responding to paragraph 72 of the Complaint, Defendants state that no law enforcement has any firearm that was in their house. Defendants state that LCSD never required them to surrender any firearms to LCSD. Therefore, Defendants deny the allegations of paragraph 72, as pled, and to the extent that Defendants violated any law or requirement imposed upon them by LCSD.

73. Defendants deny the allegations of paragraph 73 of the Complaint.

74. Defendants admit the allegations of paragraph 74 of the Complaint.

75. Responding to paragraph 75 of the Complaint, Defendants denies that they were negligent in any way. Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 75 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

76. Responding to paragraph 76 of the Complaint, Defendants denies that they were negligent in any way. Defendants admit that they are aware that Mr. Loveless underwent surgery(ies). Defendants are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 76 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

77. Defendants deny the allegations of paragraph 77 of the Complaint.

78. Paragraph 78 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

79. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 79 of the Complaint, and therefore, they are denied, and demand strict proof thereof.

80. Defendants deny the allegations of paragraph 80 of the Complaint.

81. Defendants deny the allegations of paragraph 81 of the Complaint.

82. Defendants deny the allegations of paragraph 82 of the Complaint.

83. Defendants deny the allegations of paragraph 83 of the Complaint.

84. Defendants deny the allegations of paragraph 84 of the Complaint.

85. Defendants deny the allegations of paragraph 85 of the Complaint.

86. Paragraph 86 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

87. Paragraph 87 of the Complaint is not alleged against Defendants; therefore, a response is not required. To the extent a response is required from Defendants, Defendants deny these allegations and demand strict proof thereof.

88. Paragraph 88 of the Complaint is not directed against Defendants, and therefore, no

response is necessary. To the extent one is required, Defendants deny the same.

89. Paragraph 89 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

90. Paragraph 90 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

91. Paragraph 91 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

92. Paragraph 92 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

93. Paragraph 93 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

94. Paragraph 94 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

95. Paragraph 95 and its subparts of the Complaint are not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

96. Paragraph 96 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same

97. Paragraph 97 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

98. Paragraph 98 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

99. Paragraph 99 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

100. Paragraph 100 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

101. Paragraph 101 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

102. Paragraph 102 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

103. Paragraph 103 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

104. Paragraph 104 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

105. Paragraph 105 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

106. Paragraph 106 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

107. Paragraph 107 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

108. Paragraph 108 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

109. Paragraph 109 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

110. Paragraph 110 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

111. Paragraph 111 of the Complaint is not directed against Defendants, and therefore,

no response is necessary. To the extent one is required, Defendants deny the same.

112. Paragraph 112 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

113. Paragraph 113 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

114. Paragraph 114 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

115. Paragraph 115 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

116. Paragraph 116 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

117. Paragraph 117 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

118. Paragraph 118 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

119. Paragraph 119 and its subparts of the Complaint are not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

120. Paragraph 120 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

121. Paragraph 121 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

122. Paragraph 122 of the Complaint is not directed against Defendants, and therefore,

no response is necessary. To the extent one is required, Defendants deny the same.

123. Paragraph 123 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

124. Paragraph 124 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

125. Paragraph 125 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

126. Paragraph 126 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.

127. Paragraph 127 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

128. Defendants deny the allegations of paragraph 128 of the Complaint.

129. Defendants deny the allegations of paragraph 129 of the Complaint.

130. Defendants deny the allegations of paragraph 130 of the Complaint.

131. Defendants deny the allegations of paragraph 131 (and its subparts) of the Complaint.

132. Defendants deny the allegations of paragraph 132 of the Complaint.

133. Defendants deny the allegations of paragraph 133 of the Complaint.

134. Defendants deny the allegations of paragraph 134 of the Complaint.

135. Defendants deny the allegations of paragraph 135 of the Complaint.

136. Defendants deny the allegations of paragraph 136 of the Complaint.

137. Defendants deny the allegations of paragraph 137 of the Complaint.

138. Defendants deny the allegations of paragraph 138 of the Complaint.

139. Paragraph 139 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

140. Defendants deny the allegations of paragraph 140 of the Complaint.

141. Responding to paragraph 140 of the Complaint, Defendants were aware that Cameron has mental health issues. Defendants deny the remaining allegations of paragraph 140 of the Complaint.

142. Defendants deny the allegations of paragraph 142 of the Complaint.

143. Defendants deny the allegations of paragraph 143 of the Complaint.

144. Defendants deny the allegations of paragraph 144 of the Complaint.

145. Defendants deny the allegations of paragraph 145 of the Complaint.

146. Defendants deny the allegations of paragraph 146 of the Complaint.

147. Defendants deny the allegations of paragraph 147 of the Complaint.

148. Defendants deny the allegations of paragraph 148 of the Complaint.

149. Paragraph 149 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.

150. Defendants deny the allegations of paragraph 150 of the Complaint.

151. Defendants deny the allegations of paragraph 151 of the Complaint.

152. Defendants deny the allegations of paragraph 152 of the Complaint.

153. Responding to paragraph 153 of the Complaint, Defendants were aware that Cameron had mental health issues. To the extent the allegations of paragraph 153 imply or assert that Defendants were aware that Cameron could repeatedly stab someone, Defendants deny the allegations of paragraph 153 of the Complaint.

154. Defendants deny the allegations of paragraph 154 of the Complaint.

- 155. Defendants deny the allegations of paragraph 155 of the Complaint.
- 156. Defendants deny the allegations of paragraph 156 of the Complaint.
- 157. Defendants deny the allegations of paragraph 157 of the Complaint.
- 158. Defendants deny the allegations of paragraph 158 of the Complaint.
- 159. Defendants deny the allegations of paragraph 159 of the Complaint.
- 160. Defendants deny the allegations of paragraph 160 of the Complaint.
- 161. Paragraph 161 of the Complaint incorporates prior paragraphs. To the extent a response is required, Defendants reincorporate their responses to prior paragraphs.
- 162. Paragraph 162 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.
- 163. Paragraph 163 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.
- 164. Paragraph 164 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.
- 165. Paragraph 165 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.
- 166. Paragraph 166 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.
- 167. Paragraph 167 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.
- 168. Paragraph 168 of the Complaint is not directed against Defendants, and therefore, no response is necessary. To the extent one is required, Defendants deny the same.
- 169. Paragraph 169 of the Complaint is not directed against Defendants, and therefore,

no response is necessary. To the extent one is required, Defendants deny the same.

170. Defendants deny all relief requested in the prayer.

FOR A SECOND DEFENSE
(Failure to State a Claim)

171. Plaintiffs fail to state facts sufficient to constitute a cause of action.

FOR A THIRD DEFENSE
(Intervening and Superseding Negligence and/or Intentional Acts)

172. Plaintiffs' alleged injuries and damages, if any, may have been due to and caused by the intervening and superseding negligence, recklessness, willfulness, wantonness, and intentional acts of people other than Defendants. Defendants had no control over other persons and his acts or omissions were not reasonably foreseeable to Defendants. Defendants are informed and believe that the superseding and intervening negligence, gross negligence, willfulness, recklessness, and intentional actions of another party completely bars recovery against Defendants.

FOR A FOURTH DEFENSE
(Lack of Proximate Cause)

173. Any of Plaintiffs' damages, which are denied, were not proximately caused by any acts or omissions of Defendants.

FOR A FIFTH DEFENSE
(Setoff)

174. Any recovery by Plaintiffs must be setoff or reduced or abated to the extent that any other parties' actions caused or contributed to any damages, if any.

FOR A SIXTH DEFENSE
(Failure to Mitigate)

175. Plaintiffs have failed to mitigate their damages, if any, and therefore should be denied in whole or in part the relief sought in their Complaint.

FOR A SEVENTH DEFENSE
(License)

176. Defendants plead the defense of license to be on the property of Plaintiffs.

WHEREFORE, having fully answered the Complaint, Defendants Kris and Diana Hinckley pray that this matter be dismissed, with costs, and for such other and further relief as is just and proper.

SOWELL & DuRANT, LLC

By: s/Bess J. DuRant
Thornwell F. Sowell, SC Bar No. 5197
bsowell@sowelldurant.com
Bess J. DuRant, SC Bar No. 77920
bdurant@sowelldurant.com
1325 Park Street, Suite 100
Columbia, South Carolina 29201
(803) 722-1100

*Attorneys for Defendants Kris Hinckley and Diana
Hinckley*

Columbia, South Carolina
January 15, 2025

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable George M. McFaddin, Jr., Circuit Court Judge

PROOF OF SERVICE

RECEIVED

MAR 31 2026

SC Court of Appeals

I certify that I have served the Appellants Kris and Diana Hinckley's Memorandum of Law on Appealability of Orders on all attorneys of record by electronic mail on March 26, 2026, addressed to:

Rhett Ricard, Esquire (SC Bar No. 102353)
J. David Black, Esquire (SC Bar No. 68499)
Nick Fowler, Esquire (SC Bar No. 106908)
Maynard Nexsen PC
205 King Street, Suite 400
Charleston, SC 29401
PH: 843.740.1707
rricard@maynardnexsen.com
dblack@maynardnexsen.com
nfowler@maynardnexsen.com

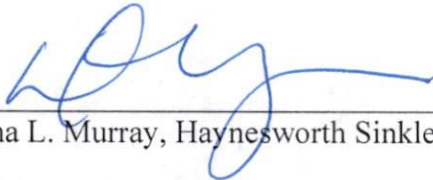
Attorneys for Respondents

Edward C. Boggs, Esquire (SC Bar No. 13506)
135 E. Main St.
Lexington, SC 29072
PH: 803-359-6194
ecb@ecboggsllaw.com

Guardian ad Litem for Cameron Hinckley

Brian P. Hubacher, Esquire (SC Bar No. 103779)
4922 O'Hear Ave., Ste. 301
North Charleston, SC 29405
PH: 843.284.1080
bphubacher@wjcblaw.com

Attorney for Cameron Hinckley



Diana L. Murray, Haynesworth Sinkler Boyd

**HAYNSWORTH
SINKLER BOYD**

HAYNSWORTH SINKLER BOYD, P.A.
ONE NORTH MAIN STREET, 2ND FLOOR
P.O. BOX 2048 (29602)
GREENVILLE, SOUTH CAROLINA 29601
MAIN 864.240.3200
FAX 864.240.3300
www.hsblawfirm.com

SARAH P. SPRULL
DIRECT 864.240.3220
ssprull@hsblawfirm.com

March 26, 2026

VIA EMAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *Bruce and Joanne Loveless v. Kris Hinckley, et al.*
C.A. No: 2024-CP-32-05200

RECEIVED
MAR 31 2026
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed please find Appellants' Memorandum of Law Regarding Appealability of Orders, along with Exhibits A-I, and Proof of Service.

Please return a clocked copy to me by email.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Diana L. Murray

DLM/dlm
Enclosures

cc: Rhett Ricard, Esq.
J. David Black, Esq.
Nick Fowler, Esq.
Edward C. Boggs, Esq.
Brian P. Hubacher, Esq.
Bess Durant, Esq.

GND ADV



US POSTAGE ARTHEY BOWEN

ZIP 29201 \$ 010.45⁰
02 7W
0008042461 MAR 26 2026

**HAYNSWORTH
SINKLER BOYD**

P.O. BOX 11889
COLUMBIA, SOUTH CAROLINA 29211-1889

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

MAR 31 2026

SC Court of Appeals