

FORM 15
RECORD ON APPEAL

RECEIVED

SEP 30 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
County of Berkeley
In The Circuit Court #9
Civil Case No. 2025-CP-08-03987

Edwin D. Rogers

Plaintiff

v.

Terrence T. Tully

Defendant

RECORD ON APPEAL

Terrence T. Tully
1908 Rock Fish Road
Moncks Corner, S.C.
29461
Defendant

Plaintiff Attorney
John B. Williams
209 East Main Street
Moncks Corner SC
29461

INDEX

Record on Appeal Form 15	Pages 1-11
Magistrates Court Summons Restraining Order (Harassment and Stalking) with 40 Accusations By Plaintiff Civil Case# 2025OR0810400028	Pages 12-20
1. Plaintiffs Accusations	Pages 15 -20
Magistrates Return from December 5th 2025 Civil Case #2025OR0810400028	Pages 21-38
1. Magistrate Hearing Testimony of Plaintiff Edwin Rogers Questioned by Defendant's including Defendants Arguments/Grievances	Pages 33-34
2. Magistrate Hearing Testimony of Plaintiff Edwin Rogers Recross Questioned by Defendants Attorney Including Defendants Arguments/Grievances	Page 35
3. Magistrate Hearing Testimony of Plaintiff's wife Patricia Rogers Question by Defense Attorney Including Defendants Arguments/Grievances	Pages 36-37
4. Magistrate Hearing Testimony Recross of Plaintiff Edwin Rogers by Plaintiffs Attorney Including Defendants Arguments/ <u>Grievances</u>	Page 38
Circuit Court Hearing before Honorable Maite Murphy March 3, 2026	Pages 39-51
1. Plaintiff Attorney Mr. Williams Statement including Defendants along with Defendants Arguments/Grievances	Page 51
Defendants Facts and Final Arguments for Dismissal for Restraining Order	Pages 52-53
Defendant's Exhibits	Pages 54-71

Magistrates Court December 5, 2025

Testimony of Plaintiff Edwin D. Rogers Questioned by Defendants Attorney Mr. Doughty

1. Under Oath after being shown a short clip that was taken by Defendant's home security system Plaintiff was asked If that was in fact him in the video Plaintiffs acknowledged that it may have been him in the video but he was not on defendant's property but rather in the **public park or undeveloped property**. Plaintiff also denied allegations that he was taking any type of video or photos of defendant or his property.
Magistrates Court Hearing Page 23 Lines 12 thru 16

Argument/Grievance

Plaintiff and Plaintiff's attorney Mr. Williams stated Numerous times Under oath that The Plaintiff was not on Defendants property but on Neighborhood Park property. Plaintiff had full knowledge that property in question was not a park belonging to Pimlico Civic Community Club, property in question was privately owned as of 12/16/21. Plaintiff was clearly seen on the Defendant's and private property taking photos, Plaintiff at the time was not listed as a board member so was not taking photos in the interest of Pimlico Civic Community Club interests, **Exhibit I Page 63**. Plaintiff was clearly taken photos surveyor's property stakes and the construction work being done on Defendants property for whatever reason Defendant does not know.

Park property in Question Platt #198-11-02-055 alongside Defendants home on 1908 Rock Fish Road Moncks Corner Platt #198-11-02-020 was not a park or just vacant land as plaintiff and Plaintiffs Attorney Mr. Williams have stated. Property was purchased by a Mr. Davis Burke of SYNERGY Development Group on 12/6/21 from a Mr. Ben Russell President of Pinnacle Homes. So, on 5/20/22 Plaintiff was indeed trespassing on the Defendants property and on Mr. Burke's property as well.

Adjacent owners of property were all mailed a notice December of 2022 from Synergy development group Informing homeowners if they had any vehicles, trailers or any personal property to remove by February 28th 2021, properties were being surveyed.

Plaintiff being active with the homeowner committee board had full knowledge that the lot alongside Defendants home was not a park at the time of his trespassing but privately owned by Mr. David Burke.

Plaintiff was on Defendants property for the sole reason of taking photos of the construction work The defendant was having done seawall and moving fence 15 foot to the left onto Defendants property line before Mr. Burke started to develop of property. Defendant's fence originally installed a 2013 was installed 15 feet in from property line to keep boat and work trailer on the outside of the fence of Defendants backyard.

This property line was surveyed by Mr. Burkes surveying company Coastal Dimensions land surveying, and Mr. Burkes surveyor did in fact agree with existing property markers.

Property Platt, Berkeley County Card, Surveyor information, photos of property markers and Previous owner Ben Russell Letter.

Exhibit A Page 55 - Copy of previous owner Ben Russell's letter.

Exhibit B Page 56 - Berkeley County Property Card showing property transaction Date 12/16/2021 on Parcels including 198-02-055

Exhibit C Page 57 - Berkeley County GIS Aerial Map of properties in question

Exhibit D Page 58 - Copy of owner Synergy Corp letter Notifying residents to remove personal property from his newly purchased parcels by February 28th 2022, Properties were being surveyed by Mr. Burkes surveyor.

Exhibit E Page 59– SYNERGY Corp. Survey Company Coastal Dimensions Boundary Survey
Exhibit F Page 60 Synergy Corp and Surveyor information (copy of business cards)
Exhibit G & H Pages 61 & 62- Photos of Defendants front and back property lines
Exhibit I Page 63 – Pimlico News Letter with Civic Club Members
Exhibit J Page 64 - List of Plaintiffs 40 accusations against Defendant, 28 of which Plaintiff stated happened in front of his home, marked by *
Exhibit K Page 70- Copy of police report defendant filed on 5-20-22 against Plaintiff trespassing
Exhibit L Page 71- Court settlement agreement dated That ruled in my favor for bodily injuries that I sustained by Edwin D Rogers while he was Illegally dumping trash alongside my home
Case #2017-CP-08-954
Exhibit M - Video's #1, #2, #3, #4, #5 and #6 clearly show Plaintiff of Defendants property

2. Under Oath Plaintiff stated at Magistrate's Court Summons Hearing 12-5-25 **(1 of 40 Accusations on Magistrates Summons page 17) that on 5-20-22** while Plaintiff was walking down Rock Fish Road from the park towards his house defendant came driving by yelling profanities. Plaintiff then stated that Defendant parked in his driveway came out to the road and continued his tirade and kept threatening to put his foot up his ass.

Viewing video #6 which is a 2 minute 37 second video Defendant is seen coming home after wife called stating that the Plaintiff was in our backyard taking photos. As Defendant was approaching his home Defendant stopped about 40 feet (opposite street) from Plaintiff in the road and asked the Plaintiff why he was in his backyard, Plaintiff kept walking. As Defendant was pulling into his driveway Plaintiff was approximately halfway into his driveway. Once Defendant parked his van which can be seen at 1 minute 16 second into video Plaintiff is seen walking back into the road yelling and screaming at Defendant that the Defendant was stealing property also stating that the Defendant was moving his fence where it did not belong. Plaintiff then gave the Defendant the finger which can plainly be seen on video #6 yelling and cursing and then went on stating that all this work was being done without permits and that he was reporting Defendant to the proper authorities.

Viewing the short #6 video it is Clearly shown that the Defendant did not Approach or go out to the road Yelling screaming and cursing at the Plaintiff as Plaintiff stated. Defendant did not in any way walk towards or in any way act in an aggressive manner towards the Plaintiff. The Defendant was in the center of his driveway pointing at his property asking Plaintiff why he was trespassing. The Plaintiff in fact is the aggressive party guilty of going into the road yelling, screaming, cursing and giving the Defended the middle finger, after he in fact was a few minutes prior trespassing on Defendants property taking photos, all seen on video #6

Exhibit M – Video #6

**Testimony of Plaintiff Edwin Rogers on
Recross Questioned by Defendants
Attorney Mr. Doughty**

Defense Attorney Mr. Doughty on Recross Plaintiff

On recross the plaintiff was asked to confirm that during the shown video to confirm he was taking photographs of the defendant's home and yard. Plaintiff acknowledged that he may well have been the individual in the video but maintained that he did not recall ever taking photographs of the Defendant's property. The video was shown again to the parties after viewing the video Plaintiff acknowledged that the figure must have been him.

Magistrates Court Hearing Page 24 Lines 3 thru 7

Argument/Grievance

The Plaintiff lied under oath stating he did not Recall taking any photos which he denied quite a few times. Plaintiff also denied being on Defendant's property which is clearly marked with white stakes and Surveyors stakes.

Exhibit G & H Pages 61 & 62 - Photos of property lines

Exhibit M - Video's #1, #2, #3, #4, #5 and #6 clearly show Plaintiff of Defendants property

Magistrates Court December 5, 2025

Testimony of Plaintiffs Wife Patricia Rogers Questioned by Mr. Defendant Attorney Mr. Doughty

Under Oath the defense attorney Mr. Doughty Asked The plaintiffs wife Mrs. Rogers if they in fact have security cameras on their home as well in their mailbox to which the witness confirmed. Counsel asked witness if any of the alleged instances at or around their home for their mailbox had been recorded on the security equipment witness indicated that the events **had not been captured**.

Magistrates Court Hearing Page 25 Lines 1 thru 5

Argument/Grievance

Plaintiffs wife stated that they In fact have security system cameras on their home Including a doorbell camera and a camera at the mailbox. If plaintiff has security cameras throughout the home including a mailbox camera and doorbell camera. **Forty allegations Beginning 11-15-18 and ending 11-10-25 Twenty Eight** of which according to plaintiff happened in front of his home, why weren't any of the 28 allegations over the course of this time against defendant caught on any of the Plaintiffs home security cameras. Plaintiff states that they have Home surveillance cameras, Doorbell camera and mailbox cameras. The plaintiffs wife was asked at the hearing if they have any video footage and **her reply was no**.

Exhibit J Pages 64–69 - List of Plaintiffs accusations against Defendant 28 of which stated happened in front of his home marked by *

Redirect of Patricia Rogers Plaintiffs Wife by Defense Attorney

Upon redirect, Plaintiff counsel asked the witness if they had a doorbell camera to which she confirmed witness testified that they also have other cameras and security measures and intend to install more.

Magistrates Court Hearing Page 25 Lines 6 thru 8

Argument/Grievance

Plaintiff Attached 40 allegations on Magistrate Summons One of which was **dated 7-26-22 (Page 66 fourth allegation down)** between the hours of midnight at 5:00 AM plaintiff was startled awake by three very loud knocks on front door. Plaintiff continued on saying "I don't mean regular knocks it sounded like someone was trying to knock the door in". If plaintiff has a doorbell camera along with security cameras throughout the home why wasn't any video produced. Also for such a frightening experience in the middle of the night as in Knocking the door in You would think that police would be called to check out the property and a police report documented.

Exhibit J Page 66 – List of Plaintiffs accusations against Defendant Page 66 Date 7-26-22

Defense attorney Mr. Doughty Recrossed Mrs. Rogers

Defense attorney Recrossed and asked about the camera at the mailbox and if it was a separate camera from the doorbell camera, which witness said it is and testified that they have had the camera on the mailbox for a while but not when the events began.

Magistrates Court Hearing Page 25 Lines 9 thru 11

Argument/Grievance

Plaintiffs wife stated that they In fact have security system cameras on their home Including a doorbell camera and a camera at the mailbox. If Plaintiff has security cameras throughout the home including a mailbox camera and doorbell camera. **Forty allegations** Beginning 11-15-18 and ending 11-10-25 **Twenty Eight of which according to plaintiff happened in front of his home**, why weren't any of the 28 allegations over the course of this time against defendant caught on any of the Plaintiffs home security cameras. Plaintiff states that they have Home surveillance cameras, Doorbell camera and mailbox cameras.

The Plaintiffs wife was asked at the hearing if they have any video footage and **her reply was no**. Plaintiff Documented 40 allegations against Defendant 25 of those allegations supposedly happened directly in front of Plaintiff's home. Yet Plaintiff has not produced one video from home security system cameras, video from doorbell camera, video from mailbox cameras, photos from cell phone or audio from cell phone. **Exhibit J Pages 64-69 Magistrates Summons List of Plaintiffs 40 accusations against Defendant, 28 of these accusations According to plaintiff occurred in front of plaintiff's home**

12/5/18, 10/8/19, 12/3/19, 4/27/20, 5/28/20, 7/30/20, 8/6/20, 4/6/21, 7/14/21, 9/1/21, 12/10/21, 2/24/22, 5/20/22, 7/22/22, 7/26/22, 8/16/22, 12/8/22, 12/20/22, 3/7/23, 5/3/23, 11/14/23, 2/26/24, 4/25/24, 11/26/24, 1/30/25, 9/16/25, 10/8/25 and 10/10/25.

Magistrates Court December 5, 2025

**Testimony of Plaintiff Edwin D. Rogers
on Recall by Plaintiffs Attorney Mr.
Williams**

Under Oath when Cross Examined Plaintiff once again denied being on Defendant Terrence Tully's property and taking photos.

Magistrates Court Hearing Page 31 Lines 8 thru 12

Argument/Grievance

The Plaintiff, once again lied to the court under oath; he was in fact on Defendants property taking photos. White stakes are property lines along with surveyors stakes orange tape, also attached photos of Front and back survey stakes.

Exhibit G & H Pages 61 & 62- Photos of Defendants property lines

Exhibit M - Video #1 and Video #6

S. C. Circuit Court Hearing before Honorable Maite Murphy March 3, 2026
County of Berkeley
In the Circuit Court
C.A. #2025-CP-08-3987
Proceedings

Plaintiff Attorney Mr. Williams Statement

Plaintiff's attorney Mr. Williams stated To the Circuit Court judge Honorable Maite Murphy on March 3rd 2026 that the Defendant Terrence Tully admitted at the Magistrates hearing December 5th 2025 that he had been arrested three times previously, **all on assault type charges and one of them involved a pistol. Plaintiff's Attorney Mr. Williams addressed the Judge and stated "which I think also assisted the Magistrate Judge in reaching her decision"**

Circuit Court Hearing Page 48 Lines 20 thru 24

Argument/Grievance

The plaintiff's attorney Mr. Williams lied with the intent of swaying the Circuit Court Judges decision by making two untrue accusations.

1. The Defendant was charged with one assault not three 48 years ago on April 1978 and the charges were dropped to a Resisting arrest violation. Defendants arrest record is as followed as Defendant stated at the original **Magistrates Court hearing on December 5th 2025 (Magistrates Return) Page 28 Lines 16 thru 20.**
 - a. **50 years ago October 9th 1978 burglar charges dropped.** I was arrested October 9th 1976 at 9:00 AM and charged with burglary. My vehicle was stolen from in front of my parents home the night before my arrest and my vehicle was identified at the burglary scene. Perpetrators were caught driving my vehicle that day and I was immediately released that day, Charges were dropped, this should not be on my record.
 - b. **48 years ago April 1978 assault charges dropped charged with resisting arrest violation.** I had an argument with my girlfriend at her home during a party. Police were called and I was arrested for resisting arrest and assault. I had 11 witnesses 5 of which were my girlfriends family stating that I did not in any way assault anyone, assault charges were dropped leaving me with a violation of resisting arrest.
 - c. **Years ago November 1983 Defendant was charged with telephone harassment.** My older sister called me at my home and told me that her husband who was a Nassau County N.Y. police officer at the time threatened her by pointing his service revolver at her while in a drunken state. I called brother in law and told him that I was reporting him to his commanding officer in the morning, I was arrested that night by Suffolk County police and released with telephone harassment, a violation.
Magistrates Court Hearing December 5th 2025 Page 28 Lines 16 thru 20
2. **Defendant was never accused, arrested or charged with any type of pistol charge in his life. This was a serious untrue accusation stated in front of Circuit Court judge by Plaintiff's attorney with the sole intention of swaying the judge's decision making the Defendant look like a street thug and common criminal.**

Final Arguments for Dismissal

Defendant is Requesting the court to dismiss or reverse Restraining Order based on the following facts;

1. The Plaintiff's attorney Mr. Williams lied and misled and swayed the Circuit Court Judge decision on March 3, 2026. **Attorney Williams exact words were "defendant admitted that he had been arrested three times previously all on assault type charges, and one of them involved a pistol, which I think also assisted the Magistrate in reaching her decision".**
These accusations by Plaintiff's Attorney are serious and untrue. Plaintiff attorney Mr. Williams clearly and knowingly lied to the Circuit Court judge to sway Judge's decision at the Circuit Court Appeal Hearing by making the Defendant sound like a common street thug with three assault charges including one with a Handgun.
2. All of 40 of these false insane allegations and fictitious dates began after my lawsuit against the Plaintiff and Pimlico Community Center on 4/9/18 which ended in my favor awarding me \$29,000 for my medical bills which I sustained from Plaintiff striking me with his trailer on 8/25/15 while I was Questioning and filming him illegally dumping Rubbish in lot alongside my home. At the time Plaintiff was Pimlico Civic Club President. Plaintiff lost his seat as President of Pimlico Civic Club association after outcome of lawsuit being exposed for illegally dumping in lot. According to the Plaintiff 28 of these accusations happened in front of his home dates are as follows
3. **12/5/18, 10/8/19, 12/3/19, 4/27/20, 5/28/20, 7/30/20, 8/6/20, 4/6/21, 7/14/21, 9/1/21, 12/10/21, 2/24/22, 5/20/22, 7/22/22, 7/26/22, 8/16/22, 12/8/22, 12/20/22, 3/7/23, 5/3/23, 11/14/23, 2/26/24, 4/25/24, 11/26/24, 1/30/25, 9/16/25, 10/8/25 and 10/10/25.**
4. Plaintiff Stated that on 5 separate occurrences he had witnesses of Defendants supposed harassing behavior yet Plaintiff did not produce one witness besides the Plaintiff's wife.
 - a. **Page 16 Date 10-18-20 Fellow Civic Club Community Member Jerry Crumpler**
 - b. **Page 16 Date 10-22-20 Fellow Civic Club Community Member Tom Biglin**
 - c. **Page 17 Date 7-22-22 Plaintiff's Son**
 - d. **Page 17 Date 12-8-22 Neighbor Holly Bell**
 - e. **Page 19 Date 4-25-24 Neighbor Mike Shealy**
5. Accusation from the Magistrates Court Summons list of 40 Supposed occurrences dated 7/26/22 claim Pertaining to the Phantom door knocker. If Plaintiff has doorbell camera as stated by him and his wife during Magistrates hearing, why did he not produce video or photo of the phantom door knocker with doorbell camera. Such a frightening experience between 12:00 and 5:00 AM why were the police not called and police report filed.
6. The Plaintiff lied and denied numerous times during Magistrate Court hearing December 5th 2025 under oath about trespassing on defendant's property and blatantly denied numerous times taking photos which he can clearly be seen on Defendants video.
7. Plaintiff claims 40 allegations between 11-15-18 thru 10-10-25, **Twenty-Eight** of these allegations according to his statements occurred directly in front of his home (**Magistrates Summons pages 15 thru 20 highlighted with Asterisk**). Plaintiff and plaintiff's wife stated in Magistrate Court that they had numerous security cameras on the home, a doorbell camera and cameras on their mailbox. Plaintiff has not produced any home security videos, doorbell video, Cell phone video, cell phone photographs nor any type of audio to substantiate any of these 40 false allegations that had **taken place in the past seven years Including the 28 supposed occurrences that happened in front of Plaintiff's home.**

8. Plaintiff stated on the 40 alleged allegations attached to Magistrates summons **page 17 item dated 12/8/22** neighbor Holly Bell was visiting and as she was leaving hollered back to him that someone had damaged your mailbox. On **12/20/22 page 18** Plaintiff stated that someone had damaged his mailbox again and on **5/3/23 page 18** Plaintiff stated that mailbox was damaged once again Plaintiff did not submit any photos of damaged mailbox on any of these 3 supposed occurrences Nor did plaintiff produce neighbor Holly Bell as witness.
9. If Plaintiff believes that **“Defendant is sick in the head and most likely dangerous”** as he had stated on **page 17 item dated 8/16/22**. Why would Plaintiff be trespassing on Defendant's property taking photos of construction work and property lines If he felt defendant was “sick in the head and most likely dangerous”.
10. The Plaintiff is an Angry, Bitter, Vindictive man bent on revenge and retaliation and apparently having age-related issues. Plaintiff is using the Court System as a weapon and or tool in retaliation for a lawsuit that the Defendant filed against the Plaintiff for assaulting Defendant by running him over with Trailer with outcome in Defendants favor on April 9th 2018. Outcome of this lawsuit caused Plaintiff to lose his seat as President of the Pimlico Civic Club Association.
11. Defendant solely believes that if Plaintiff is successful in getting Restraining Order granted with these fictitious accusations Plaintiff will use Restraining Order to file another fictitious accusation in attempt to get Defendant arrested and charged.

Thank you for your time in this Matter
Regards

Terrence T. Tully

CC

Court of Appeals
220 Senate Street
Columbia SC 29201

Plaintiff Attorney
Jonh B. Willams
209 East Main Street
Moncks Corner SC
29461

**STATE OF SOUTH CAROLINA
COUNTY OF BERKELEY**

Terrence Tully
1908 Rock Fish Rd
Moncks Corner, SC 29461-7036

MAGISTRATE SUMMONS

You are hereby summoned to be and appear personally in the

**Moncks Corner Magistrate
223 N. Live Oak Drive
P. O. Box 6122
Moncks Corner, SC**

on **October 31, 2025 at 2:00 PM** to serve as a party in a Bench Trial in the case of:

RE: Edwin D Rogers

Vs Terrence T Tully

PLAINTIFF(S)

DEFENDANT(S)

Civil Case Number: **2025OR0810400028, Restraining Order.**

**HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN
SUCH CASE MADE AND PROVIDED.**

**Moncks Corner Magistrate
223 N. Live Oak Drive
P. O. Box 6122
Moncks Corner, SC 29461
Phone: (843) 719-5043
Fax: (843) 719-4528**

October 14, 2025

STATE OF SOUTH CAROLINA)

COUNTY OF Berkeley)

Edwin D. Rogers Jr)

PLAINTIFF(S)

VS.

TORRENCE T. Tully)

DEFENDANT(S)

IN THE MAGISTRATES COURT

COMPLAINT AND MOTION
FOR RESTRAINING ORDER
(Harassment and Stalking)

2025CR0810400028
CIVIL CASE NUMBER

The Plaintiff alleges:

1. The Plaintiff lives in Berkeley County.
2. The Defendant lives at 1908 Rockfish Rd (Pineico), which is in Moncks Corner, SC.
3. The Harassment First or Second Degree or Stalking occurred in Pineico, SC.
4. Plaintiff further alleges that the following conduct occurred by the defendant on the times, dates, and places listed below, and such conduct falls within the definition of:
☒ HARASSMENT, FIRST DEGREE (§16-3-1700 (A)), or
☐ HARASSMENT, SECOND DEGREE (§ 16-3-1700 (B)), or
☐ STALKING (§ 16-3-1700 (C)).

5. October 3, 2025, at 4:30 o'clock, A.M./P.M. (circle one), at 1912 Rockfish Rd Moncks Corner SC, which is in Berkeley County, SC, the conduct complained of occurred when the defendant:

took his vehicle right up to me, put his window next to my door and began to yell obscene language and gestures

On September 16, 2025, at 4:30 o'clock, A.M./P.M. (circle one), at 1912 Rockfish Rd Moncks Corner, SC, which is in Berkeley County, SC, the conduct complained of occurred when the defendant:

crossed out to my side & he started about 1 foot from me & said

SCCA/749 (Amended 12/2015)

begin to yell obscene language and obscene gestures

On February 20, 2024, at 11:15 O'clock, A.M./P.M. (circle one), at 1912 Rockwell Rd, which is in Marble Rock (Pulaski) SC, the conduct complained of occurred when the defendant:

I was blowing off the road in front of my house, Talk pulled up right next to me a blow his horn, continued over horn. I bitterly with my pants and and chest pains

(State details of harassment/stalking and other facts and circumstances upon which relief is sought above. Attach additional sheets if necessary.)

6. Plaintiff requests: (Check one or more)

- ☒ a. That the defendant be enjoined from abusing, threatening to abuse, or molesting the plaintiff or members of the plaintiff's family.
- ☒ b. That the defendant be enjoined from entering or attempting to enter the plaintiff's place of residence, employment, education, or other location.
- ☒ c. That the defendant be enjoined from communicating or attempting to communicate with the plaintiff in a way that would violate Article 17, Chapter 16 of the 1976 South Carolina Code of Laws, as amended.

SWORN to and Subscribed before me

This 14 day of October, 2025.

[Signature]
Notary Public for South Carolina

My Commission expires: 11.21.26

[Signature]
Signature of Plaintiff or Person Filing
on Behalf of Plaintiff

NOTICE: THE NON-PREVAILING PARTY IN THIS ACTION IS ASSESSED A FILING FEE OF FIFTY-FIVE DOLLARS (\$55.00). THE COURT MAY HOLD A PERSON IN CONTEMPT OF COURT FOR FAILURE TO PAY THIS FILING FEE. §16-03-170(D).

NOTICE TO DEFENDANT: YOU HAVE THE RIGHT TO EMPLOY COUNSEL TO REPRESENT YOU.

SCCA/749 (Amended 12/2015)

* FRONT of PHAINTISS Come

History of Threats and Harassment from Tully

1.

11-15-18-This morning I was walking down Albert Storm. (When I walk, I walk facing traffic; however, if a vehicle is coming and nothing is coming from behind, I cross the road and walk facing traffic from the other side so the on-coming vehicle does not have to change lanes.) I saw a vehicle coming toward me so I switched sides. After I had switched sides, the vehicle also started switching sides. It just kept on coming and I had to get all the way down the ditch to get out of the path of the on-coming vehicle. It was Tully and he was hanging out the window of his van screaming profanities. I shot the bird and he stopped and backed up and began yelling profanities-how he had fucked my mother and anything else he could think of. I told him to get out of the van and I would kick his ass. He wouldn't get out but eased on down the street hollering that he had fucked me and my lawyers out of \$30,000.

* 12-5-18 I walked out to my mail box and Tully started hollering down the street at me. He was using all kinds of profanity, telling me how he had been "fucking my wife." His wife walked out their front door and he quit hollering at me.

Sometime in late August of 19, I was driving out of Pimlico on Pimlico Blvd. behind a white van. I recognized the van as Tully's so I slowed down so as not to catch up with him. When we got all the way out to old 52 he got in the left turning lane. I was going straight so I stayed in my lane but pulled up enough that I couldn't look down into his van. Tully backed up, changed lanes and pulled up right beside me (almost hitting my left outside mirror). He put down his passenger side window and started hollering all kinds of profanity. My driver's side window was up, I just smiled at him and when the light turned green I pulled off and left him sitting at the intersection.

* 10-8-19 I was washing my truck in my side driveway. Tully rode by real slow, put down his passenger side window and hollered "hey, you cocksucker" as he slowly drove by. I was over 100 feet away from the street, but he was loud enough that I clearly heard him. What about the rest of the neighborhood?

* 12-3-19 I was at my mail box when Tully was driving down Rockfish. He crossed over to my side of the street and stopped his van right behind me. He had his window down and just started cussing me for everything he could think of. I told him I was tired of his mess and for him to get out of the truck and let's settle this once and for all. He told me "go fuck yourself" and he drove on down to his house.

* 4-27-20. Tully was passing as I was heading to my mail box. When I got to the mail box, Tully was getting out of his van. He hollered "hey cocksucker". I ignored him and he hollered "HEY" but I ignored him again and walked back to the house.

* 5-28-20 I was sitting on my side driveway when Tully rode by real slow with his window down. He was just hollering profanities at me. Luckily, my guest had just left.

7-30-20 I was grilling beside my garage when Tully drove by, heading home, with his black window down. He hollered out real loud "hey, you cocksucker".

8-6-20. I was walking up my side driveway, carrying a hoe and shovel, when I saw Tully creep past in his van. Before I could get up to my side garage door, Tully had gone down the street, turned around and came creeping back by. He put down his driver's side window and just hollering profanities at me. He went down to his house, went inside but left his lights on his truck, so I assumed he was going to leave again. I quickly called my wife and she came out with her phone. She was going to video him as he passed. Shortly he came back by, but didn't put down his window even though I was out where he could see me.

10-2-20 this morning when I was walking, Tully came driving by. He slowed way down-creeping by with his driver's side window down about half way just spewing profanities at me.

10-18-20 Jerry Crumpler and I were out in front of the Community Center working on the marquee when Tully came by real slow just blaring his horn. Jerry asked, what was wrong with that fellow.

10-22-20 I was down working on the Community Center when Tully came by. He started blaring his horn before he got to the fire station next door and blew it way past the Community Center. Tom Biglin, who was working with me, asked "what was all that about"?

1-22-21 Trish and I were riding our bikes. As we were returning home-coming down Rockfish, I saw Tully in his front yard standing behind to his van. We stopped to check our mail and Tully came from behind his van and came down his drive toward the front. He stopped and kept shooting me "the bird". There was no dialog.

4-6-21, I was walking back from the mail box when Tully came creeping by. He put down his window about half way and hollered "you cock sucker" and then drove on down to his house.

7-14-21, I was mowing grass in my front yard. As I approached the road, Tully was coming down Rockfish. He changed lanes coming right along my front lawn. As he got right behind me, he slowed to a creep, put down his window and started hollering all kinds of profanity at me. I gave my mower more gas and pulled away from him. He is such a jerk!

9-1-21, I was at my side garage door feeding my cat. I heard a vehicle so I looked up—it was Tully. He put his side window down about half way and hollered "ass hole" Tully really must be sick-his actions are not normal!

12-10-21 Trish and I were getting in my truck when Tully went by real slow. I gave him time to get on down the road and I pulled out of my yard. Shortly I found Tully driving really slow-going thru Pimlico. Trish told me to hang back and let Tully go. I did and Tully drove real slow

3.
down Albert Storm and then Pimlico Blvd. He then pulled off at the Community Center and I went by. He pulled out behind me and ran right up on my tail and stayed this way all the way to the stop light at Old 52. He pulled left in the turning lane, but I caught the green and shot straight thru the intersection. Tully was coming up on the left and just started blowing his horn. Trish told me that Tully must be bi-polar because he was always acting crazy.

* 2-24-2022 My wife and I were loading our car for a road trip to New Bern NC Tully comes by real slow hanging out his truck window. He hollers really loud "hey you cock sucker" This fellow must be sick!

* 5-20-22 As I was walking down Rockfish from the park toward my house, Tully came driving by real slow, put down his window and stranded hollering profanities at me. He parked in his drive, came out to the road and continued his tirade and kept threatening to put his foot up my "tired old ass". He told me that if I came back to his end of the street, he would really show me what an ass cutting was. video

* 7-22-22 My son had borrowed my truck and returned it today. When he got here he asked me if Tully owned a silver SUV. I told him yes, but why did he ask? Ed told me that this SUV came up on his tail out on Pimlico Blvd. and tailgated him all the way in. Ed said not just tailgating, but right up on his back bumper until he turned on to my drive. Tully couldn't see through the tinted back glass and probably thought it was me driving my truck.

* 7-26-22 About three weeks ago sometime between midnight and 5AM, I was startled awake by three very loud knocks on my front door. I don't mean regular knocks-it sounded like someone was trying to knock the door in. I jumped out of bed, grabbed my pistol and went to the front door. However, I couldn't see anyone. STRANGE! Today I was in the front yards and Tully came creeping by, I spoke (waved) to him. He put down his passenger side window about half way and hollered "KNOCK, KNOCK. At first, I thought that Tully had finally fully lost his mind. However, after thinking about it, I wondered if Tully was trying to let me know he was the ghost that had knocked on my door a few weeks ago? Door Camera?

* 8-16-22 Earlier today I was working on the light between my two garage doors. I heard a car horn blow so I turned around facing the street. Tully had his passenger window down about 1/2 way as he crept by the front of my house. He was shooting me the birds and hollering all kind of nasty stuff about my mother. I fully believe this man is sick in the head and most likely dangerous.

* 12-8-22 My neighbor Holly Bell had been visiting and as she was leaving, she hollered back and said someone had destroyed my mail box. Upon examination I found the front door/lid had been bent back under the mail box-both hinges were broken. This was not hit by the mailman or someone because it wasn't bent to the side, but deliberately bent straight back under the support.

I have no way of knowing who did this, but Tully is obsessed with being mean and downright ugly to me every chance he gets.

12-13-22 My cat "Freddie" has disappeared-been missing for a couple of days. Today I was racking the leaves in my front yard, Tully was helping load lumber that had been used to form some concrete he had just poured. His new gate was open so they could bring the lumber threw. Later I was still working in my front yard and looked down towards Tully's and saw a new wire small animal trap sitting right in front of his gate that just been open several minutes before. This trap was right in the way of the gate and appeared to have been placed right out in front so I would be sure to see it. I don't know for sure, but could Tully be trying to tell me that he "had taken care of Freddie"?

12-20-2022 Someone has broken my mailbox again since yesterday's delivery. When I went to get my mail today, I found the lid bent straight back under the box again, I plan to get a camera.

3-7-23 I was out in front of our garage doors changing the IPTAY stickers on our cars when I heard someone holler "hey asshole". I looked up and saw Tully creeping by. He had his window down and was "shooting me the birds". This fellow must be sick, he just won't quit.

5-3-23 Well it has happened again, Some A-hole has beat up my mail box again. This is done from the ground, not a vehicle because, same as twice before, the front lid is broken straight back under the mail box. Plus, this time, it looks like they hit each side with a baseball bat. Pictures are available. After the previous occasion, I set up a camera; however, the SD card had maxed out on 4-25-23.

5-10-23 Well he has done it again! As Trish and I were heading out on Bass, Tully turned off Albert Storm onto Bass. When he saw our car he moved across the center line onto our side of the road heading straight towards us, I held my course and at the last minute he whipped back on to, his side of the road. Trish said "I really think he is trying to wreck us."

11-14-23 When I went to my mail box this afternoon, Tully was in his front yard watering a tree he had transplanted. When he looked up and saw me, I waved a friendly neighborly wave. He shot me the bird and shouted "fuck you and your mother" I responded by telling him to "come down here and tell me that." He started his tirade about fucking my mother in the mouth and she spit me out. He was still hollering his filth when I turned around and walked back to my house. I am really getting tired of his foul mouth. We really don't need his trash in our neighborhood.

2-26-2024 Recently I cut down a small dead tree in my front yard. My neighbor, Jim Henderson was going to help me load the stump onto my truck. I pulled the stump out on the street so he could get his small track hoe up to it and load the stump on my truck. When I dragged the stump out on the street it left a good bit of dirt on the street. Later. I was out in the street with my backpack blower cleaning up the street. Earlier I had seen Mrs. Tully in the front yard with her

SUV; therefore, I kept looking back to make sure I wasn't in her way if she was going out. The next thing I knew, Tully had pulled the SUV right up behind me and sat down on his LOUD horn. It scared me so bad that I latterly wet my pants. He then pulled around me and shot me the bird as he went by. He really is one sick fellow!!! He is so deranged I am beginning to fear for my life!

4-25-24, Trish and I just returned from a few days at the beach While we were gone, our neighbor, Mike Shealy picked up our mail. He owns a white F-150 very similar to mine. Mike told me earlier this week he stopped at our mail box to get our mail and noticed Tully coming down the street in his van. Mike said Tully crossed over to his side of the street and pulled up right beside him-close enough that Tully almost hit his outside mirror. Tully had his window down so Mike put his down and asked Tully "what the fuck do you want?" Tully clearly showed surprise and quickly pulled off. Mike went on around the cull de sac and went home

11-26-24 It has been a while since Tully showed this stuff. Today I was standing in my front yard raking leaves. Along came Tully in his white van-he put down the window about half way, struck his arm out and shot me the "bird" from one side of my yard all the way across the front to the far side. He appeared to have a bandage on this finger. This sick fellow just can't quit!

12-27-24 A couple of weeks ago I was coming into Pimlico on Pimlico Blvd while driving my truck. As I was approaching Pimlico, I recognized Tully's van approaching me. All of a sudden, he moved across the middle line, about half a truck width heading straight to me. I held my course in my lane, wondering if this would be the time he wrecked me. At the very last minute he whipped back across into his lane. Each time he gets closed to a head-on collision!

1-30-25 I was raking leaves in my front yard, needed a new bag and was headed to the garage to get one when I heard a vehicle greatly accelerating, I turned around and realized it was Tully coming down Rockfish at a fast clip, When he got to our property, he slowed down to a snail's pace, put his window down about half way and started his tirade of cussing me for all types of "mother fuckers and cock suckers"

1-30-25 Later in the day I was going thru Goose Creek om US 52, I came up behind a SUV that looked like Tully's, I moved to the right and went around it in the middle lane. Shortly, I saw this same SUV accelerating up the far right lane, came up beside me when I realized it was Tully and a female (I assume it was his wife). All of a sudden, he switched lanes back to the left, cutting me off by a fraction of an inch. If I hardened braked hard, he would have taken the front off my truck! This fool is hell bent on harassing me—maybe even hurting me!

9-16-25. I was out beside the road painting my mail box. I heard a noise and looked up. I saw Tulley coming straight at me on the wrong side of the road-he was too close for me to relocate. He slowed right beside me and hollered "you cock sucking mother fucker" Trish was coming out our front door and saw Tulley, but to far away to hear what he said. I am sick and tired of his constant harassment.



10-8-25 Late this afternoon I was cleaning off the drive where I had blown grass during my earlier grass mowing. I hear a noise so I looked up and saw Tully coming down Rockfish. He had crossed over to my side of the street, clipped the edge of my front yard and pulled up about 2 feet from me as I stood in my drive. He had his window partially down and started his normal tiered calling me a mother fucking cock sucker while shooting me the finger. He didn't stop or I would have hit him with something! This has gone on way too long-it has to stop before I hurt him! I called the Sheriff's Department and requested they send a deputy out so I could file an official complaint. A deputy came out a little later (Deputy Poland). He listened to my complaint, never wrote anything down, asked if Tully was home and I told him yes. I asked him for his card and told him I would be down in a couple of days to get a copy of his report. He had no cards, but gave me his name and case number on a scrap of paper. I plan to take copies of my three complaints down to see if I can get a Restraining Order. This has gone on way too long and something has to be done. I told Deputy Poland that if the Sheriff's Department didn't do something, I was! I noticed that Deputy didn't go down to talk with Tulley.



10-10-25 Trish and I were in my truck. As we pulled to the end of our drive, we had to wait for Tully to pass before we could pull out on Rockfish. Tully pulled way over on our side of the street, put his window down about half way, put his hand out and shot us the bird. Trish said "I wish I had my camera out". "This is about enough of his stuff". I agree. I have had it with this clown!

STATE OF SOUTH CAROLINA
COUNTY OF BERKELEY

Edwin D. Rogers,
Plaintiff,

vs

Terrence T. Tully,
Defendant

IN THE MAGISTRATES COURT

CIVIL CASE NUMBER: 2025OR0810400028

2025CP0803987

2025 DEC 23 AM 2:36
CLERK OF COURT
BERKELEY COUNTY, SC

FILED

MAGISTRATE'S RETURN

1 THIS MATTER CAME BEFORE the court on an application for Restraining Order filed
2 by the plaintiff on October 14, 2025. Based on the application by plaintiff, this court issued a
3 summons for the defendant to appear before the court on October 31, 2025, to answer the
4 allegations set forth in the complaint. Constable Gregory Zedalis successfully served the
5 defendant on October 16, 2025, at 1:50 pm at the address provided by plaintiff.

6 Defendant, by and through his attorney Thaddeus Doughty, filed an Answer, a Motion to
7 Suppress, and a Motion for Continuance on October 22, 2025. The matter was continued, and the
8 parties notified of the new date of November 10, 2025. Defense counsel requested an additional
9 continuance due to defendant's availability on November 10, 2025, and the request was granted
10 and rescheduled for November 17, 2025, notices provided to all parties. On November 4, 2025,
11 this court received Notice of Appearance from attorney John B. Williams on behalf of the plaintiff.
12 On November 5, 2025, attorney Williams submitted a Motion for Continuance, which was granted,
13 and the case was rescheduled for December 5, 2025, with all parties notified.

14 On December 5, 2025, the case was called and both parties appeared with their attorneys.
15 Prior to beginning, the parties were asked if any agreement had been reached; there was not. All
16 witnesses that intended to testify were duly sworn in and a summary of the case based on the court
17 filing was read into the record. The complaint filed by the plaintiff indicated that the parties had

1 been experiencing conflict off and on not only over the last calendar year, but back to 2018. At
2 this time, the plaintiff began.

3 Mr. Williams began by questioning Mr. Rogers. Mr. Rogers testified that he resides at
4 1912 Rockfish Rd, Moncks Corner, and had resided there for three decades. Mr. Rogers testified
5 about his personal history in the Army, serving in Vietnam, and the following years, earning a
6 degree from Clemson, and lengthy employment with a local company. Mr. Rogers testified that
7 he is married, and they have three adult children. Mr. Rogers testified that the defendant, Mr. Tully,
8 is his neighbor and that he is seeking relief from the constant harassment that the defendant directs
9 toward the plaintiff and his wife. Plaintiff testified that he has contacted the Berkeley County
10 Sheriff's Office repeatedly about the behavior without much relief offered. Plaintiff testified that
11 defendant drives by the plaintiff's home slowly calling out offensive statements. Plaintiff testified
12 that defendant attempted to run him off the road while he was walking on a public street and
13 defendant was driving his personal vehicle. Plaintiff testified that defendant intentionally rides the
14 bumper of his vehicle when they encounter one another in traffic. Plaintiff testified that on at least
15 one occasion the defendant faced him on the roadway in their neighborhood and "played chicken"
16 with full sized vehicles. Plaintiff testified that while traveling in Goose Creek on Hwy 52, he
17 encountered the defendant on the roadway and attempted to avoid contact, but defendant noticed
18 him and cut him off in traffic. Mr. Rogers testified about multiple instances in which the defendant
19 has yelled profanity at him, endangered plaintiff in vehicles, and the alike. Plaintiff testified that
20 the listing of instances that was attached to the complaint was compiled over the course of years
21 of instances, police reports, and extensive notes on the behavior of the defendant culminating to
22 the filing of an application for restraining order.

1 Defense counsel began questioning the plaintiff. Counsel questioned plaintiff about an
2 incident on November 15, 2018, inquiring if plaintiff told defendant to get out of his van so you
3 could "kick his \$\$\$" and then allege that defendant had wrongfully obtained \$30,000.00 from a
4 settlement. Plaintiff testified that the incident occurred as described. Plaintiff went on to testify
5 that the settlement was a result from a lawsuit filed against the plaintiff individually and the civic
6 center due to injuries allegedly sustained at the negligence of the named parties. Plaintiff testified
7 about an incident on December 5, 2018, in which defendant was allegedly hollering at plaintiff
8 down the street and plaintiff called BCSO three times but no action was ever taken against
9 defendant, such as a restraining order. Plaintiff was questioned and testified about a recorded
10 incident on December 11, 2018, which references another incident on November 15, 2018,
11 between the parties in which plaintiff states defendant ran him off the road as a pedestrian.

12 Defense counsel showed a security video from the defendant's property that showed the
13 plaintiff at the community park between the residences of the parties. Plaintiff acknowledged that
14 it may have been him in the video, but he was not on the defendant's property, but rather, in the
15 public park or undeveloped property. Plaintiff denied allegations that he was photographing the
16 defendant or his property.

17 Defense counsel asked plaintiff additional questions, referring to the document filed with
18 the complaint and application for restraining order, and extensive testimony provided. During said
19 testimony, plaintiff acknowledges that multiple incidents have been occurring over seven years
20 and to date only three police reports were made by him, and no restraining order had been requested
21 previously. Defense rested.

22 On redirect, plaintiff counsel asked plaintiff outlined the incidents to the best of his ability,
23 however, he does not possess evidence or proof that some of the incidents, such as door knocking,

1 was perpetrated by the defendant. Plaintiff testified that he filed the action as a last resort to obtain
2 some level of relief from the harassment he has endured by the defendant.

3 On recross, the plaintiff was asked to confirm that during the shown video to confirm he
4 was taking photographs of the defendant's home and yard. Plaintiff acknowledged that he may
5 well have been the individual in the video but maintained that he did not recall ever taking
6 photographs of the defendant's property. The video was shown again to the parties. After viewing
7 the video, plaintiff acknowledge that the figure must have been him.

8 Mrs. Patricia Hazleton Rogers, plaintiff's wife, was called as a witness and was reminded
9 that she was already sworn in. Mrs. Rogers testified that she and the plaintiff have been married
10 for thirty-nine years and she has been a witness to several of the incidents between the parties.
11 Mrs. Rogers testified that she was in the vehicle during an incident in which defendant followed
12 them out of the neighborhood and followed them up to the intersection at Cypress Gardens Road
13 and Highway 52, where at the stop light, he waived his fist in the air at them. Mrs. Rogers testified
15 another incident occurred on Bass Road in which the defendant was driving toward them and came
16 into their lane of travel, swerving back into the appropriate lane at the last minute. Mrs. Rogers
17 testified that at other times, defendant has been heard outside their home, however, she is unable
18 to testify as to what was being said, only that she could hear his voice.

19 Defense counsel questioned witness concerning the incident in which they were at the
20 intersection of Cypress Gardens Road and Highway 52. Witness testified that she was not able to
21 hear what defendant was saying as the windows were up, but that he appeared to be in an angry
22 state at the time based on his body language. Defense counsel inquired about the incident on Bass
23 Road in which defendant drove into their path. Witness testified that the incident occurred, but
24 she was unable to testify initially to the dates of either incident, and was only able to pull the dates

1 based on plaintiff's notes, not her own recollection on the dates. Defense counsel asked witness
2 if they have security cameras on their home as well as at their mailbox, to which the witness
3 confirmed. Counsel asked witness if any of the alleged incidents at or around their home or their
4 mailbox had been recorded on the security equipment; witness indicated that the events had not
5 been captured. Defense rested.

6 Upon redirect, plaintiff counsel asked witness if they have a doorbell camera, to which she
7 confirmed. Witness testified that they also have other cameras and security measures and intend
8 to install more.

9 Defense recrossed and asked about the camera at the mailbox and if it was separate from
10 the doorbell camera, which witness said it is, and testified that they have had the camera on the
11 mailbox for a while but not when the events began.

12 Plaintiff counsel rested their case.

13 Defense counsel called defendant to testify. Defendant, Terrance Tully, was called to the
14 stand and was reminded that he was still under oath from the beginning of the trial. Defendant
15 testified that he resides at 1908 Rockfish Road and has since 2013. Defendant testified that he is
16 married and retired from the United States Postal Service, although he works part-time with his
17 wife. Defendant testified that in August 2015 he was injured by the plaintiff hitting him with a
18 golf cart resulting in a torn meniscus and nerve damage and after that event, a lawsuit was filed.
19 Defendant testified that the suit was later settled out of court. Defense counsel entered Defendant
20 Exhibit 1, Berkeley County Sheriff's Office report, without objection. Defendant testified that the
21 injury lawsuit against the plaintiff and the civic club was later settled. Defense submitted the
22 settlement documentation as Defense Exhibit 2, without objection. Defendant testified that the

1 matter was settled on April 9, 2018. Defendant testified that the reported incident of November
2 15, 2015, did not occur as reported.

3 Defendant went on to testify that the alleged incident of December 5, 2018, did not occur
4 as reported. Defendant further testified that allegations from 2019, 2020, 2021, and 2022 up to
5 May did not occur as reported by plaintiff. Defendant testified that he lives two doors down from
6 the plaintiff. Defense submitted Defendant's Exhibit 3 which is a copy of the plat showing the
7 locations of the residences of the plaintiff and defendant are located notated. Defendant testified
8 that on the plat it is his home, another neighbor, a community park, and then the residence of the
9 plaintiff. The exhibit was entered as evidence without objection.

10 Defendant testified that series of events on May 20, 2022, as reported by the plaintiff, are
11 not how he reported the incident. Defendant testified that on May 20, 2022, he was leaving the
12 neighborhood and received a frantic phone call from his wife reporting that the plaintiff was half
13 naked in their backyard taking photographs of the back of the home and sea wall. Defendant
14 testified that three sides of his fence had been removed to allow access for the work to be done on
15 the sea wall. Defendant returned to the home and observed the plaintiff walking off the property
16 and he asked the plaintiff what he was doing on the property of the defendant, to which the plaintiff
17 cussed him out, accused the defendant of stealing, and vowed to get to the bottom of it. Defendant
18 testified that he has a video related to the date in question and that a police report was made of the
19 events of the day. Defendant's Exhibit 4, BCSO report, was entered as evidence, without
20 objection. Defendant testified that there was a video of the event; the video was played in the
21 courtroom for the parties to observe. Defendant testified that the video was from his home security
22 cameras. Defendant testified that the video shows his property markers and further testified that
23 the construction trailers observed in the video are on his property. Defendant testified that the

1 plaintiff is shown to be on the defendant's property, without permission, and taking photographs
2 of the home and construction efforts that were being performed on the property. Defendant
3 testified that he demanded to know why the plaintiff was on his property but remained on his
4 property during the entire encounter.

5 Defendant testified that the allegations of July 22, 2022, involving plaintiff's son did not
6 occur as reported. Defendant testified that the remaining incidents reported for 2022 and 2023 did
7 not occur as they have been reported by plaintiff. Defendant testified that the events of February
8 26, 2024, did not occur as reported; however, testified that he and his wife were traveling on
9 Rockfish Road when they came upon plaintiff, who had earmuffs on, was in the middle of the
10 street with a blower, and his back turned to them. Defendant testified that they approached him in
11 their vehicle and tooted the horn twice approximately fifteen feet away to get his attention.
12 Defendant testified that after a few moments the plaintiff had not acknowledged them, he tooted
13 the horn again, at which time the plaintiff jumped and turned around responding with profanity at
14 them. Defendant testified that the intention of hitting the horn in his vehicle was to gain the
15 attention and acknowledgement of the plaintiff as he was in the roadway blowing debris off the
16 road, not to subject him to any danger or threat.

17 Defendant testified that the remainder of the allegations outlined by the plaintiff for 2024
18 did not occur as reported. Defendant testified that the stated allegations in 2025 did not occur as
19 reported. Defendant testified that the problems began with the plaintiff when they were building
20 their home in 2013, and started over a tree that was hitting the home during construction, to which
21 they gained appropriate permission to remove the tree. Defendant testified that they were on the
22 property during the build and cleaning up the debris from the tree when the plaintiff approached
23 him and threatened him as the president of the Pimlico Civic Association indicating that they did

1 not have permission to cut down the tree, they had rules in the community, and that he (defendant)
2 had not heard the last of him (plaintiff). Defendant testified that not longer after they moved in,
3 in 2014, they were unpacking and he looked outside to see plaintiff on his golf cart standing up
4 taking photos of his home, they were having a deck built. Defendant testified that the following
5 day two separate Berkeley County officials visited his home to confirm proper permitting and
6 documentation for the deck build. Defendant testified that the stalking and harassment by the
7 plaintiff has been ongoing since they moved in, but became more intense after the settlement in
8 2018, with the plaintiff taking photographs of their home and trespassing on the property.
9 Defendant testified that except for the videos presented in court, he had not had evidence to support
10 an application for a Restraining Order, which is why he has never filed before. Defendant testified
11 that plaintiff regularly uses profanity and obscene gestures toward him in the neighborhood.

12 Cross examination began. Defendant testified that he works with his wife in her business
13 dealing with home foundations, mold remediation, and crawlspace encapsulation. Defendant
14 testified that they have employees, and he helps with the business. Defendant testified that they
15 have been married for 33 years and that he had been married one time before for only a year.
16 Defendant testified that he was arrested once in 1976 and accused of burglary, but the charges
17 were immediately dismissed as the correct perpetrator was found the next day. Defendant testified
18 that he was arrested in 1977 for assaulting a police officer, but the charges were dropped.
19 Defendant testified that he was charged after his brother-in-law threatened his sister with a gun, in
20 which he was charged with harassment. Defendant testified that he has weapons in his home and
21 is licensed to possess through South Carolina and as a non-resident in Florida.

22 Plaintiff counsel asked defendant about the door knocking incident reported on July 26,
23 2022, as he testified that it did not occur. Defendant testified that the implication is that he was

1 the perpetrator, and that he did not knock on plaintiff's door. Plaintiff counsel asked defendant
2 how he would know the incidents of December 8, 13, or 20, 2022, did not occur. Defendant stated
3 that he was bedridden for several weeks and unable to drive following back surgery in November
4 2022, so he could not have been the culprit.

5 Plaintiff counsel questioned defendant concerning the events of February 26, 2024,
6 clarifying that plaintiff was wearing a backpack style leaf blower and ear protection, to which
7 defendant testified in affirmative. Plaintiff counsel questioned defendant as to why Mrs. Rogers
8 would testify to being present at some of the incidents as reported, was she lying? Defendant
9 testified he had no idea why she would testify, but they did not occur.

10 Plaintiff counsel questioned defendant as to the park property between the homes and
11 access. Defendant testified that the property ownership, at the time of the February 2024 event,
12 was with a corporation and that he and two other neighbors attempted to gain ownership of the
13 land; however, plat was sold to Berkeley County.

14 Plaintiff counsel questioned defendant about why the plaintiff and his wife would attempt
15 to concoct stories about the defendant in support of the application for Restraining Order.
16 Defendant testified that to his knowledge, everything is a result of the lawsuit that resolved in
17 2018. Plaintiff counsel questioned defendant about the size of his property at the time purchase.
18 Defendant testified that the property is the same size today that it was at the time of purchase.
19 Plaintiff counsel inquired if defendant objected to the issuance of a Restraining Order. Defendant
20 testified that he does not go anywhere near plaintiff, but that the plaintiff comes onto his property.
21 When asked, the defendant testified that he does object to the Court issuing an order limiting his
22 actions or behaviors.

1 Redirect from defense counsel. Defense counsel questioned defendant concerning the
2 ownership of the park and whether plaintiff was on the park property or defendant's property.
3 Defendant testified it was his property. Defense counsel asked for clarity on being arrested.
4 Defendant testified that the three arrests were more than ten years old and all three resulted in
5 dismissals. Witness dismissed.

6 Defense called Mrs. Patty Tully. Mrs. Tully was reminded that she is still under oath.
7 Patricia Tully testified as to her home address, marital status as defendant's wife of over thirty
8 years, and employment as a business owner. Defense counsel questioned witness concerning
9 events of May 20, 2022. Mrs. Tully testified that on the day in question, defendant had left the
10 home and she was looking out the rear facing windows of the home and was surprised to see the
11 plaintiff in the yard taking photos of the back of their home and the work being done on the sea
12 wall at the edge of their property. Witness stated that she called defendant, and he immediately
13 came home and addressed the situation with plaintiff. Witness testified that the plaintiff was not
14 invited nor was he provided permission to be on the property. Witness testified that the plaintiff
15 entered the back left corner of the property as their fence had been taken down to allow
16 construction equipment access.

17 Witness testified that during the construction of their home, they had to have a tree cut
18 down, and after that, they were cleaning up debris. Witness testified that during the cleanup, the
19 plaintiff came onto the property and began berating them, telling them that there were rules in
20 place, that he was the president of the community association, and that they had to have permission,
21 which they did. Witness testified that in 2015 the defendant was injured in a golf cart incident that
22 resulted in significant injury and a lawsuit. Witness testified that at some time after the conclusion
23 of the lawsuit in 2018, plaintiff was removed as president of the community association. Witness

1 testified that an incident took place three or four years ago in which she and the defendant were
2 working in the yard at their home, she observed the plaintiff drive by the home and make obscene
3 gestures.

4 Cross examination. Witness testified that the plaintiff was in her backyard, and they have
5 photographic proof of the trespassing. Witness testified that she observed the defendant go down
6 after being hit by the golf cart operated by the plaintiff in 2015.

7 Redirect. Witness testified that she has video of plaintiff in the backyard.

8 Plaintiff counsel recalled plaintiff to the stand. Plaintiff counsel questioned plaintiff if the
9 events of May 20, 2022, if he had been on the defendant's property as alleged. Plaintiff testified
10 that he was not on their property. Plaintiff went on to testify that he had been on the defendant's
11 property during a stage of the construction in 2013. Plaintiff emphatically denies the allegations
12 of defendant that he was on their property.

13 Cross examination and follow up by defense counsel. Defense counsel asked plaintiff if
14 the defendant had been harassing him for seven years, why would he (plaintiff) bring workers on
15 defendant's property beer or other such beverages. Plaintiff testified that he was trying to slow
16 them down and be a good neighbor. Defense rest.

17 Closing statements provided by counsel for both parties.

18 This court carefully reviewed the evidence as presented and considered the testimony of
19 both parties as well as witnesses before rendering a decision in this matter. After deliberation and
20 careful consideration of the extensive testimony of the parties, this court issued a Restraining Order
21 on behalf of the plaintiff. Copies of the Order were placed in the regular mail to counsel for each
22 party on December 8, 2025. Defendant filed Notice of Appeal on December 11, 2025.

Copies of file documentation has been attached and included hereto.

Respectfully submitted,

December ____, 2025
Moncks Corner, South Carolina


Judge Paula F. McElvogue
Berkeley County Magistrate

Enclosures:

Summons, Complaint, and Motion for Restraining Order with attachments
Hearing Notice for October 31, 2025
Affidavit of Service
Defendant's Answer
Defendant's Motion to Suppress
Defendant's Motion for Continuance
Hearing Notices for November 10, 2025
Defendant's Request for Continuance
Hearing Notices for November 17, 2025
Plaintiff's Continuance Request
Plaintiff's Motion for Continuance
Hearing Notices for December 5, 2025
Defendant's Exhibits 1-4
Restraining Order
Affidavit of Service by Mail of Restraining Order
Notice Intent to Appeal

Magistrates Court December 5, 2025

Testimony of Plaintiff Edwin D. Rogers Questioned by Defendants Attorney Mr. Doughty

1. Under Oath after being shown a short clip that was taken by Defendant's home security system Plaintiff was asked If that was in fact him in the video Plaintiffs acknowledged that it may have been him in the video but he was not on defendant's property but rather in the **public park or undeveloped property**. Plaintiff also denied allegations that he was taking any type of video or photos of defendant or his property.
Magistrates Court Hearing Page 23 Lines 12 thru 16

Argument/Grievance

Plaintiff and Plaintiff's attorney Mr. Williams stated Numerous times Under oath that The Plaintiff was not on Defendants property but on Neighborhood Park property. Plaintiff had full knowledge that property in question was not a park belonging to Pimlico Civic Community Club, property in question was privately owned as of 12/16/21. Plaintiff was clearly seen on the Defendant's and private property taking photos, Plaintiff at the time was not listed as a board member so was not taking photos in the interest of Pimlico Civic Community Club interests, **Exhibit I Page 63**. Plaintiff was clearly taken photos surveyor's property stakes and the construction work being done on Defendants property for whatever reason Defendant does not know.

Park property in Question Platt #198-11-02-055 alongside Defendants home on 1908 Rock Fish Road Moncks Corner Platt #198-11-02-020 was not a park or just vacant land as plaintiff and Plaintiffs Attorney Mr. Williams have stated. Property was purchased by a Mr. Davis Burke of SYNERGY Development Group on 12/6/21 from a Mr. Ben Russell President of Pinnacle Homes. So, on 5/20/22 Plaintiff was indeed trespassing on the Defendants property and on Mr. Burke's property as well.

Adjacent owners of property were all mailed a notice December of 2022 from Synergy development group Informing homeowners if they had any vehicles, trailers or any personal property to remove by February 28th 2021, properties were being surveyed.

Plaintiff being active with the homeowner committee board had full knowledge that the lot alongside Defendants home was not a park at the time of his trespassing but privately owned by Mr. David Burke.

Plaintiff was on Defendants property for the sole reason of taking photos of the construction work The defendant was having done seawall and moving fence 15 foot to the left onto Defendants property line before Mr. Burke started to develop of property. Defendant's fence originally installed a 2013 was installed 15 feet in from property line to keep boat and work trailer on the outside of the fence of Defendants backyard.

This property line was surveyed by Mr. Burkes surveying company Coastal Dimensions land surveying, and Mr. Burkes surveyor did in fact agree with existing property markers.

Property Platt, Berkeley County Card, Surveyor information, photos of property markers and Previous owner Ben Russell Letter.

Exhibit A Page 55 - Copy of previous owner Ben Russell's letter.

Exhibit B Page 56 - Berkeley County Property Card showing property transaction Date 12/16/2021 on Parcels including 198-02-055

Exhibit C Page 57 - Berkeley County GIS Aerial Map of properties in question

Exhibit D Page 58 - Copy of owner Synergy Corp letter Notifying residents to remove personal property from his newly purchased parcels by February 28th 2022, Properties were being surveyed by Mr. Burkes surveyor.

Exhibit E Page 59– SYNERGY Corp. Survey Company Coastal Dimensions Boundary Survey
Exhibit F Page 60 Synergy Corp and Surveyor information (copy of business cards)
Exhibit G & H Pages 61 & 62– Photos of Defendants front and back property lines
Exhibit I Page 63 – Pimlico News Letter with Civic Club Members
Exhibit J Page 64 - List of Plaintiffs 40 accusations against Defendant, 28 of which Plaintiff stated happened in front of his home, marked by *
Exhibit K Page 70- Copy of police report defendant filed on 5-20-22 against Plaintiff trespassing
Exhibit L Page 71- Court settlement agreement dated That ruled in my favor for bodily injuries that I sustained by Edwin D Rogers while he was Illegally dumping trash alongside my home
Case #2017-CP-08-954
Exhibit M - Video's #1, #2, #3, #4, #5 and #6 clearly show Plaintiff of Defendants property

2. Under Oath Plaintiff stated at Magistrate's Court Summons Hearing 12-5-25 (1 of 40 Accusations on Magistrates Summons page 17) that on 5-20-22 while Plaintiff was walking down Rock Fish Road from the park towards his house defendant came driving by yelling profanities. Plaintiff then stated that Defendant parked in his driveway came out to the road and continued his tirade and kept threatening to put his foot up his ass.

Viewing video #6 which is a 2 minute 37 second video Defendant is seen coming home after wife called stating that the Plaintiff was in our backyard taking photos. As Defendant was approaching his home Defendant stopped about 40 feet (opposite street) from Plaintiff in the road and asked the Plaintiff why he was in his backyard, Plaintiff kept walking. As Defendant was pulling into his driveway Plaintiff was approximately halfway into his driveway. Once Defendant parked his van which can be seen at 1 minute 16 second into video Plaintiff is seen walking back into the road yelling and screaming at Defendant that the Defendant was stealing property also stating that the Defendant was moving his fence where it did not belong. Plaintiff then gave the Defendant the finger which can plainly be seen on video #6 yelling and cursing and then went on stating that all this work was being done without permits and that he was reporting Defendant to the proper authorities.

Viewing the short #6 video it is Clearly shown that the Defendant did not Approach or go out to the road Yelling screaming and cursing at the Plaintiff as Plaintiff stated. Defendant did not in any way walk towards or in any way act in an aggressive manner towards the Plaintiff. The Defendant was in the center of his driveway pointing at his property asking Plaintiff why he was trespassing. The Plaintiff in fact is the aggressive party guilty of going into the road yelling, screaming, cursing and giving the Defended the middle finger, after he in fact was a few minutes prior trespassing on Defendants property taking photos, all seen on video #6

Exhibit M-- Video #6

**Testimony of Plaintiff Edwin Rogers on
Recross Questioned by Defendants
Attorney Mr. Doughty**

Defense Attorney Mr. Doughty on Recross Plaintiff

On recross the plaintiff was asked to confirm that during the shown video to confirm he was taking photographs of the defendant's home and yard. Plaintiff acknowledged that he may well have been the individual in the video but maintained that he did not recall ever taking photographs of the Defendant's property. The video was shown again to the parties after viewing the video Plaintiff acknowledged that the figure must have been him.

Magistrates Court Hearing Page 24 Lines 3 thru 7

Argument/Grievance

The Plaintiff lied under oath stating he did not Recall taking any photos which he denied quite a few times. Plaintiff also denied being on Defendant's property which is clearly marked with white stakes and Surveyors stakes.

Exhibit G & H Pages 61 & 62 - Photos of property lines

Exhibit M - Video's #1, #2, #3, #4, #5 and #6 clearly show Plaintiff of Defendants property

Magistrates Court December 5, 2025

Testimony of Plaintiffs Wife Patricia Rogers Questioned by Mr. Defendant Attorney Mr. Doughty

Under Oath the defense attorney Mr. Doughty Asked The plaintiffs wife Mrs. Rogers if they in fact have security cameras on their home as well in their mailbox to which the witness confirmed. Counsel asked witness if any of the alleged instances at or around their home for their mailbox had been recorded on the security equipment witness indicated that the events **had not been captured.**

Magistrates Court Hearing Page 25 Lines 1 thru 5

Argument/Grievance

Plaintiffs wife stated that they In fact have security system cameras on their home Including a doorbell camera and a camera at the mailbox. If plaintiff has security cameras throughout the home including a mailbox camera and doorbell camera. **Forty allegations Beginning 11-15-18 and ending 11-10-25 Twenty Eight** of which according to plaintiff happened in front of his home, why weren't any of the 28 allegations over the course of this time against defendant caught on any of the Plaintiffs home security cameras. Plaintiff states that they have Home surveillance cameras, Doorbell camera and mailbox cameras. The plaintiffs wife was asked at the hearing if they have any video footage and **her reply was no.**

Exhibit J Pages 64–69 - List of Plaintiffs accusations against Defendant 28 of which stated happened in front of his home marked by *

Redirect of Patricia Rogers Plaintiffs Wife by Defense Attorney

Upon redirect, Plaintiff counsel asked the witness if they had a doorbell camera to which she confirmed witness testified that they also have other cameras and security measures and intend to install more.

Magistrates Court Hearing Page 25 Lines 6 thru 8

Argument/Grievance

Plaintiff Attached 40 allegations on Magistrate Summons One of which was **dated 7-26-22 (Page 66 fourth allegation down)** between the hours of midnight at 5:00 AM plaintiff was startled awake by three very loud knocks on front door. Plaintiff continued on saying "I don't mean regular knocks it sounded like someone was trying to knock the door in". If plaintiff has a doorbell camera along with security cameras throughout the home why wasn't any video produced. Also for such a frightening experience in the middle of the night as in Knocking the door in You would think that police would be called to check out the property and a police report documented.

Exhibit J Page 66 – List of Plaintiffs accusations against Defendant Page 66 Date 7-26-22

Defense attorney Mr. Doughty Recrossed Mrs. Rogers

Defense attorney Recrossed and asked about the camera at the mailbox and if it was a separate camera from the doorbell camera, which witness said it is and testified that they have had the camera on the mailbox for a while but not when the events began.

Magistrates Court Hearing Page 25 Lines 9 thru 11

Argument/Grievance

Plaintiffs wife stated that they In fact have security system cameras on their home Including a doorbell camera and a camera at the mailbox. If Plaintiff has security cameras throughout the home including a mailbox camera and doorbell camera. **Forty allegations** Beginning 11-15-18 and ending 11-10-25 **Twenty Eight of which according to plaintiff happened in front of his home**, why weren't any of the 28 allegations over the course of this time against defendant caught on any of the Plaintiffs home security cameras. Plaintiff states that they have Home surveillance cameras, Doorbell camera and mailbox cameras.

The Plaintiffs wife was asked at the hearing if they have any video footage and **her reply was no**. Plaintiff Documented 40 allegations against Defendant 25 of those allegations supposedly happened directly in front of Plaintiff's home. Yet Plaintiff has not produced one video from home security system cameras, video from doorbell camera, video from mailbox cameras, photos from cell phone or audio from cell phone. **Exhibit J Pages 64-69 Magistrates Summons List of Plaintiffs 40 accusations against Defendant, 28 of these accusations According to plaintiff occurred in front of plaintiff's home**

12/5/18, 10/8/19, 12/3/19, 4/27/20, 5/28/20, 7/30/20, 8/6/20, 4/6/21, 7/14/21, 9/1/21, 12/10/21, 2/24/22, 5/20/22, 7/22/22, 7/26/22, 8/16/22, 12/8/22, 12/20/22, 3/7/23, 5/3/23, 11/14/23, 2/26/24, 4/25/24, 11/26/24, 1/30/25, 9/16/25, 10/8/25 and 10/10/25.

Magistrates Court December 5, 2025

**Testimony of Plaintiff Edwin D. Rogers
on Recall by Plaintiffs Attorney Mr.
Williams**

Under Oath when Cross Examined Plaintiff once again denied being on Defendant Terrence Tully's property and taking photos.

Magistrates Court Hearing Page 31 Lines 8 thru 12

Argument/Grievance

The Plaintiff, once again lied to the court under oath; he was in fact on Defendants property taking photos. White stakes are property lines along with surveyors stakes orange tape, also attached photos of Front and back survey stakes.

Exhibit G & H Pages 61 & 62- Photos of Defendants property lines

Exhibit M - Video #1 and Video #6

STATE OF SOUTH CAROLINA
COUNTY OF BERKELEY
IN THE CIRCUIT COURT
C.A. NO.: 2025-CP-08-3987

TERRENCE TULLY,

PETITIONER,

VS.

EDWIN ROGERS

RESPONDENT.

H E A R I N G
BEFORE THE HONORABLE MAITE MURPHY

DATE: MARCH 3, 2026
LOCATION: SOUTH CAROLINA CIRCUIT COURT 9
TRANSCRIBED BY: KRISTEN PRIMM

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

APPEARANCES:

THADDEUS JAMES DOUGHTY, ESQUIRE
THAD J. DOUGHTY, ATTORNEY AT LAW
6650 RIVERS AVENUE
N. CHARLESTON, SOUTH CAROLINA 29406

ATTORNEY FOR THE PLAINTIFF

JOHN B. WILLIAMS, ESQUIRE
WILLIAMS & HULST, LLC
209 E. MAIN STREET
MONCKS CORNER, SOUTH CAROLINA 29461

ATTORNEY FOR THE DEFENDANT

INDEX

PROCEEDINGS	4
CERTIFICATE OF TRANSCRIBER	12

(THIS TRANSCRIPT MAY CONTAIN QUOTED MATERIAL. SUCH MATERIAL IS
REPRODUCED AS READ OR QUOTED BY THE SPEAKER.)

P R O C E E D I N G S

UNIDENTIFIED SPEAKER: Next case is *Terrence Tully*
versus Edwin Rogers.

MR. DOUGHTY: Good morning, Your Honor. Thad Doughty
here for Mr. Tully.

THE COURT: Good morning, Mr. Doughty.

MR. WILLIAMS: Jack Williams here for Mr. Rogers. And
Mr. Rogers is here, also including him on this.

THE COURT: All right. Now, it looks like this is a
motion; is that correct? An appeal?

MR. DOUGHTY: Yes, ma'am.

THE COURT: And whose appeal is this?

MR. DOUGHTY: This is Mr. Tully's appeal, my client,
Your Honor.

THE COURT: All right. Mr. Doughty, I'll be happy to
hear from you, sir.

MR. DOUGHTY: All right. Thank you, Your Honor. There
was a motion for -- a restraining order was filed in this
case on October 14, 2025. The hearing was held on December
5th of 2025, and the court -- magistrate court in this case,
issued a ruling from the bench on December 5th of 2025, and
the order was issued on December 10th of 2025.

Your Honor, in this case, the Respondent brought several
allegations against -- against my client, the Appellant,
claiming various allegations from November 15th of 2018 to

1 October 8th of 2025. The parties had previously been
2 involved in a lawsuit in which the Respondent in this case
3 settled with my client over an assault, and they've had
4 problems ever since, Your Honor.

5 In the -- in the application, there were some 40
6 incidents between November of 2018 -- 40 allegations, I'm
7 sorry, between November of 2018 until October of 2025. We
8 entered a video basically showing that on a specific date,
9 that the -- in 2022, that the Respondent was actually on the
10 property of the Appellant.

11 And there was also testimony from the Respondent that in
12 2022, or thereabouts, he had -- he was on the property of the
13 Appellant to bring some workers some beer. Your Honor, first
14 claim is that the Respondent did not provide evidence in
15 support of his harassment, second degree, charge.

16 Your Honor, the court's -- first point is, the court's
17 order does not specify which allegations or allegations on
18 which they base their ruling on. And I think that's
19 important, Your Honor, because, as you know, the statute
20 requires a continuity of purpose, a pattern which -- meaning
21 a continuity of purpose.

22 Therefore, it's hard for us to directly address the
23 specifics of the court's findings, and we believe that, based
24 on that, the order is insufficient. As you know, Your Honor,
25 the -- a restraining order deprives the Appellant of certain

1 rights and privileges and also affects job opportunities.

2 It comes on background checks, and it subjects you to
3 criminal prosecution if there's an alleged violation of the
4 restraining order. And Your Honor, I think it's important if
5 -- if a restraining order can be issued without proof, then -
6 - you know, then next step, a violation, is possible for -- a
7 violation of the -- alleged violation of the restraining
8 order to also be offered without proof.

9 The Respondent made over 40 allegations in his
10 complaint, Your Honor, yet he only produced three police
11 reports. The dates of these reports were, October 8th of
12 2025, August 6th of 2020, and December 5th of 2018. None of
13 these reports led to an arrest or even the police talking
14 with the Appellant, Mr. Tully.

15 And December -- on the December 28th report, the officer
16 mentions that the Respondents make -- the Respondent made
17 reference to an incident in which he was sued by the
18 Respondent -- I mean, by the Appellant, Mr. Tully, my client.

19 Also in the August 2020 report, the officer notes that
20 the Respondent, Mr. Rogers, mentioned the lawsuit again, the
21 amount of the settlement, and he -- he wanted this alleged
22 incident documented for his attorney.

23 And I say that to say, Your Honor, that we believe that
24 the basis of this suit, or this application for restraining
25 order, was based on the fact that my client was successful in

1 suing for assault prior -- you know, prior to him making
2 these allegations.

3 And then in the report of October 8, 2025, he alleges
4 that the -- the -- my client, the Appellant, drove by and
5 shouted some words at him. The officers made a report, but
6 they never met or talked with my client. I think it's
7 important for the -- the court to note that the Appellant,
8 which is my client, we showed a home video from his cameras -
9 - a home -- I mean, not a home video, but footage from his
10 home cameras that showed the Respondent in 2022, on the
11 Appellant's property.

12 And that's important because one of the allegations
13 brought by the Respondent is that this is allegedly one of
14 the days he's alleging that my client confronted him. The
15 Respondent testified that he had doorbell cameras on his
16 home, another camera on his mailbox, and alleged several
17 incidents that occurred near his home.

18 However, he presented no evidence from his doorbell
19 camera or his mailbox camera. Respondent named other
20 witnesses in his allegations. However, no witness came to
21 court or testified other than his wife.

22 The Respondent's wife testified that at times she heard
23 the Respondent and Appellant talking outside, but could not
24 hear what was said. She also stated that none of the
25 conversations were caught on camera or by their mailbox

1 camera.

2 She described one incident that they were -- both
3 parties were on the road, but she -- in her testimony, she
4 says that she could not tell what was being said because
5 everybody's windows were up. And Your Honor, these are more
6 than just factual issues.

7 I'm getting to whether there was proof or anything
8 offered to substantiate these allegations.

9 THE COURT: So Mr. Doughty, I don't mean to interrupt
10 you, but we do have a limited time for each of these appeals.

11 MR. DOUGHTY: Yes, ma'am.

12 THE COURT: If you could just hit the highlights as far
13 as, you know, the legal issues, as far as where the judge
14 made an error of law, rather than highlighting on the facts.

15 MR. DOUGHTY: Yes, ma'am.

16 THE COURT: Obviously, I'll read the entire record of
17 appeal and look at everything.

18 MR. DOUGHTY: Yes, ma'am. Well, Your Honor, here's the
19 thing. The statute requires that you show a pattern, okay?
20 The only thing that was admitted into evidence was three
21 police reports. And, you know, the -- the statute requires a
22 pattern, a continuity of purpose, not just isolated
23 incidents.

24 It requires that you prove that. Since the judge in
25 this case did not outline what she's basing her findings on,

1 then there -- you cannot establish a pattern. It just -- you
2 know, she just says, you know, that they were -- she said
3 that, you know, that he -- I'll read directly. She said that
4 -- that he yelled at him in a -- in a profane manner.

5 And also, she found that something about him, you know,
6 on a -- there were incidents where he was reckless and
7 purposely operating a vehicle in the victim's vicinity,
8 causing the Plaintiff to fear for his life on more than one
9 occasion. But she doesn't specify when those were, and
10 there's nothing in the order to specify how she came to her
11 findings or what -- what she's basing her findings on, and
12 that's important.

13 THE COURT: Let me ask you this, Mr. Doughty, then, did
14 you file a motion for her to issue a more comprehensive
15 ruling to explain her findings?

16 MR. DOUGHTY: No, ma'am, I did not.

17 THE COURT: Okay.

18 MR. DOUGHTY: I did not, but Your Honor, the statute
19 specifically says a continuity of purpose -- and it uses the
20 word, however short, meaning, you know, that it has to be
21 continued, and it gives an examples of like cell phone
22 messages and, you know, constant harassment, things of that
23 sort.

24 But a police report from 2018, 2020, and 2025, even if
25 believed, which we don't -- we don't concede that those

1 things happened, but even if believed, would not constitute a
2 continuity of purpose. It wouldn't establish a pattern. So
3 Your Honor, I think the -- the statute 16-3-700(b) has not
4 been met in this case, and they didn't offer testimony to --
5 to -- that would satisfy that statute, and the judge's order
6 also does -- her findings does not -- does not satisfy the
7 requirements of that statute.

8 So therefore, Your Honor, we are asking that the case
9 either be reversed or remanded.

10 THE COURT: All right. Thank you, Mr. Doughty. Your
11 response, counsel, Mr. Williams?

12 MR. WILLIAMS: Your Honor, I'll be brief. The
13 magistrate's return to the issue of her order is probably one
14 of the most thorough I've ever seen in matters like this.
15 The allegations by the petition of Mr. Rogers were well
16 documented.

17 Mr. Doughty cross-examined him on those, and in this
18 matter, Your Honor, it's just how the judge viewed
19 credibility of the two witnesses. The Respondent and
20 Defendant responded -- Appellant, excuse me, Defendant
21 admitted that he had been arrested three times previously,
22 all on assault-type charges, and one of them involved a
23 pistol, which I think also assisted the magistrate in
24 reaching her decision.

25 We were there for four hours, and the judge listened

1 attentively. I don't think there's any question of law. Mr.
2 Rogers had a list of the incidents. As I said, he testified
3 to them. Mr. Doughty cross-examined him on them. The judge
4 sat there and heard every word and issued her decision, which
5 we -- our position is, it should be sustained by the court.
6 Thank you, Your honor.

7 MR. DOUGHTY: Your Honor, can I respond briefly?

8 THE COURT: Very briefly.

9 MR. DOUGHTY: Yes, ma'am. The -- none of the arrests
10 led to convictions, and all of them were over 30 years ago.
11 So I just wanted to -- yes, ma'am.

12 THE COURT: Yes, sir. Thank you, gentlemen. I'll
13 certainly take a look at the return as well as the record on
14 appeal, and issue an opinion.

15 MR. DOUGHTY: All right. Thank you, Your Honor.

16 MR. WILLIAMS: You have a good day.

17 MR. DOUGHTY: Thank you, sir.

18 THE COURT: You all have a good day.

19
20
21
22
23
24
25 (THERE BEING NOTHING FURTHER, THE HEARING CONCLUDED.)

CERTIFICATE OF TRANSCRIBER

I, Kristen Primm, a court-approved transcriber, do hereby certify that the foregoing is a true, accurate and complete Transcript of Record of the proceedings had and evidence introduced in the trial of the captioned case, relative to appeal, in the South Carolina Circuit Court for Berkeley County, South Carolina, on the 3rd day of March 2026.

I do further certify that I am neither of kin, counsel, nor interest to any party hereto.

May 5, 2026



Kristen Primm
Certified Transcriber

S. C. Circuit Court Hearing before Honorable Maite Murphy March 3, 2026
County of Berkeley
In the Circuit Court
C.A. #2025-CP-08-3987
Proceedings

Plaintiff Attorney Mr. Williams Statement

Plaintiff's attorney Mr. Williams stated To the Circuit Court judge Honorable Maite Murphy on March 3rd 2026 that the Defendant Terrence Tully admitted at the Magistrates hearing December 5th 2025 that he had been arrested three times previously, **all on assault type charges and one of them involved a pistol. Plaintiff's Attorney Mr. Williams addressed the Judge and stated "which I think also assisted the Magistrate Judge in reaching her decision"**

Circuit Court Hearing Page 48 Lines 20 thru 24

Argument/Grievance

The plaintiff's attorney Mr. Williams lied with the intent of swaying the Circuit Court Judges decision by making two untrue accusations.

1. The Defendant was charged with one assault not three 48 years ago on April 1978 and the charges were dropped to a Resisting arrest violation. Defendants arrest record is as followed as Defendant stated at the original **Magistrates Court hearing on December 5th 2025 (Magistrates Return) Page 28 Lines 16 thru 20.**
 - a. **50 years ago October 9th 1978 burglar charges dropped.** I was arrested October 9th 1976 at 9:00 AM and charged with burglary. My vehicle was stolen from in front of my parents home the night before my arrest and my vehicle was identified at the burglary scene. Perpetrators were caught driving my vehicle that day and I was immediately released that day, Charges were dropped, this should not be on my record.
 - b. **48 years ago April 1978 assault charges dropped charged with resisting arrest violation.** I had an argument with my girlfriend at her home during a party. Police were called and I was arrested for resisting arrest and assault. I had 11 witnesses 5 of which were my girlfriends family stating that I did not in any way assault anyone, assault charges were dropped leaving me with a violation of resisting arrest.
 - c. **Years ago November 1983 Defendant was charged with telephone harassment.** My older sister called me at my home and told me that her husband who was a Nassau County N.Y. police officer at the time threatened her by pointing his service revolver at her while in a drunken state. I called brother in law and told him that I was reporting him to his commanding officer in the morning, I was arrested that night by Suffolk County police and released with telephone harassment, a violation.
Magistrates Court Hearing December 5th 2025 Page 28 Lines 16 thru 20
2. **Defendant was never accused, arrested or charged with any type of pistol charge in his life. This was a serious untrue accusation stated in front of Circuit Court judge by Plaintiff's attorney with the sole intention of swaying the judge's decision making the Defendant look like a street thug and common criminal.**

Final Arguments for Dismissal

Defendant is Requesting the court to dismiss or reverse Restraining Order based on the following facts;

1. The Plaintiff's attorney Mr. Williams lied, misled and swayed the Circuit Court Judge decision on March 3, 2026. **Attorney Williams exact words were "defendant admitted that he had been arrested three times previously all on assault type charges, and one of them involved a pistol, which I think also assisted the Magistrate in reaching her decision".** Plaintiffs' Attorney Mr. Williams own words to Judge at the Circuit Court Hearing, Page 48 lines 20 - 24
These accusations by Plaintiff's Attorney are damaging, serious and totally untrue. Plaintiff attorney Mr. Williams clearly and knowingly lied to the Circuit Court judge to sway Judges decision at the Circuit Court Appeal Hearing by making the Defendant sound like a common street thug with three assault charges including one with a Handgun.
2. All of 40 of these false insane allegations and fictitious dates began after my lawsuit against the Plaintiff and Pimlico Community Center on 4/9/18 which ended in my favor awarding me \$29,000 for my medical bills which I sustained from Plaintiff striking me with his trailer on 8/25/15 while I was Questioning and filming him illegally dumping Rubbish in lot alongside my home. At the time Plaintiff was Pimlico Civic Club President. Plaintiff lost his seat as President of Pimlico Civic Club association after outcome of lawsuit being exposed for illegally dumping in lot. According to the Plaintiff 28 of these accusations happened in front of his home dates are as follows
3. 12/5/18, 10/8/19, 12/3/19, 4/27/20, 5/28/20, 7/30/20, 8/6/20, 4/6/21, 7/14/21, 9/1/21, 12/10/21, 2/24/22, 5/20/22, 7/22/22, 7/26/22, 8/16/22, 12/8/22, 12/20/22, 3/7/23, 5/3/23, 11/14/23, 2/26/24, 4/25/24, 11/26/24, 1/30/25, 9/16/25, 10/8/25 and 10/10/25.
4. Plaintiff Stated that on 5 separate occurrences he had witnesses of Defendants supposed harassing behavior yet Plaintiff did not produce one witness besides the Plaintiff's wife.
 - a. Page 16 Date 10-18-20 Fellow Civic Club Community Member Jerry Crumpler
 - b. Page 16 Date 10-22-20 Fellow Civic Club Community Member Tom Biglin
 - c. Page 17 Date 7-22-22 Plaintiffs Son
 - d. Page 17 Date 12-8-22 Neighbor Holly Bell
 - e. Page 19 Date 4-25-24 Neighbor Mike Shealy
5. Accusation from the Magistrates Court Summons list of 40 Supposed occurrences dated 7/26 22 claim Pertaining to the Phantom door knocker. If Plaintiff has doorbell camera as stated by him and his wife during Magistrates hearing, why did he not produce video or photo of the phantom door knocker with doorbell camera. Such a frightening experience between 12:00 and 5:00 AM why were the police not called and police report filed.
6. The Plaintiff lied and denied numerous times during Magistrate Court hearing December 5th 2025 under oath about trespassing on defendant's property and blatantly denied numerous times taking photos which he can clearly be seen on Defendants video.
7. Plaintiff claims 40 allegations between 11-15-18 thru 10-10-25, **Twenty-Eight** of these allegations according to his statements occurred directly in front of his home (**Magistrates Summons pages 15 thru 20 highlighted with Asterisk**). Plaintiff and plaintiff's wife stated in Magistrate Court that they had numerous security cameras on the home, a doorbell camera and cameras on their mailbox. Plaintiff has not produced any home security videos, doorbell video, Cell phone video, cell phone photographs nor any type of audio to substantiate any of these 40 false allegations that had **taken place in the past seven years Including the 28 supposed occurrences that happened in front of Plaintiffs home.**

8. Plaintiff stated on the 40 alleged allegations attached to Magistrates summons **page 17 item dated 12/8/22** neighbor Holly Bell was visiting and as she was leaving hollered back to him that someone had damaged your mailbox. On **12/20/22 page 18** Plaintiff stated that someone had damaged his mailbox again and on **5/3/23 page 18** Plaintiff stated that mailbox was damaged once again Plaintiff did not submit any photos of damaged mailbox on any of these 3 supposed occurrences Nor did plaintiff produce neighbor Holly Bell as witness.
9. If Plaintiff believes that **"Defendant is sick in the head and most likely dangerous"** as he had stated on **page 17 item dated 8/16/22**. Why would Plaintiff be trespassing on Defendant's property taking photos of construction work and property lines If he felt defendant was "sick in the head and most likely dangerous".
10. The Plaintiff is an Angry, Bitter, Vindictive man bent on revenge and retaliation and apparently having age-related issues. Plaintiff is using the Court System as a weapon and or tool in retaliation for a lawsuit that the Defendant filed against the Plaintiff for assaulting Defendant by running him over with Trailer with outcome in Defendants favor on April 9th 2018. Outcome of this lawsuit caused Plaintiff to lose his seat as President of the Pimlico Civic Club Association.
11. Defendant solely believes that if Plaintiff is successful in getting Restraining Order granted with these fictitious accusations Plaintiff will use Restraining Order to file another fictitious accusation in attempt to get Defendant arrested and charged.
12. I have been a federal employee from 1994 through 2014. If I indeed had a criminal record I would not have been employed by the federal government as an Electronic Technician for the USPS. With all of this said I am asking the court to consider all these facts and reverse and remove Restraining Order that was placed upon me on March 5th 2025.

Thank you for your time in this Matter
Regards


Terrence T. Tully

CC

Court of Appeals
220 Senate Street
Columbia SC 29201

Plaintiff Attorney
Jonh B. Willams
209 East Main Street
Moncks Corner SC
29461

Exhibits

Exhibit A Page 55 Copy of previous owner of lot Ben Russell's letter

Exhibit B Page 56 Berkeley County property card showing property transaction dated December 6th 2021 including parcel #198-02-055

Exhibit C Page 57 Berkeley County GIS Aerial map of properties in question

Exhibit D Page 58 Copy of letter from SYNERGY Corp notifying residents to remove personal property from his newly acquired parcels prior to February 28th 2022

Exhibit E Page 59 SYENERGY Corp Survey company Coastal Dimensions boundary survey

Exhibit F Page 60 SYNERGY Corp and Coastal Dimensions surveying company business cards

Exhibit G & H Pages 61 & 62 Photos of defendants front and back surveying property lines left side of home

Exhibit I Page 63 2022 Pimlico newsletter with Civic Club board members names

Exhibit J Pages 64 – 69 List of plaintiffs 40 accusations against defendant, 28 of which plaintiff stated happened in front of his home which are marked with asterisks

Exhibit K Page 70 Copy of police report Defendant filed on May 20, 2022 against Plaintiff for trespassing on Defendants property

Exhibit L Page 71 Court settlement agreement dated April 8 2018 which ruled the Defendant's favor for bodily injury by Plaintiff Edwin D. Rogers case number 2017-CP-08-954

Exhibit M Videos Videos #1, #2, #3, #4, #5 and #6 Clearly show the Plaintiff Edward D. Rogers on defendant's property on May 20th 2022

**Ben Russell, President
Pinnacle Homes USA
4389 Indian Trail-Fairview Road
Indian Trail, NC 28079
704-291-3150
ben@pinnaclehomesusa.net**

~~December 7, 2017~~

Re: Dumping and/or Burning in Pimlico Plantation

Dear Residents,

My name is Ben Russell, President of Pinnacle Homes USA, LLC. I own all parks and green areas in the Pimlico Plantation subdivision, Moncks Corner South Carolina.

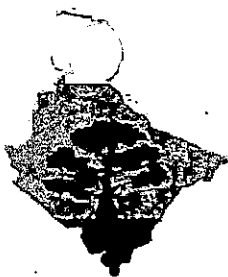
Please note that DUMPING (including leaves, grass clippings, branches and/or any homeowners lawn debris), LITTERING or BURNING of any materials in these areas is strictly prohibited.

If this behavior is observed, I will be forced to take the necessary action. Please contact me if you have any questions or concerns.

Sincerely,



Ben Russell,
President of Pinnacle Homes USA, LLC



BERKELEY COUNTY SC

L05

Property Card

Summary Information:

TMS: 198-11-02-055
Owner Information:

QUEEN CITY LAND LLC
11535 Carmel Commons BLVD Ste 101

Charlotte, NC 282265314

Owner Occupied Property: No
Homestead Exempt (Age 65+ or Disability): No

Council District: C3
Fire District: F13
Tax District: T06
TIS Zone: 1
Jurisdiction: 1P
Acres: 0.00
Lots: 1.0

Neighborhood: S450 - PIMLICO (SECTION 1)
Appraiser ID: JS
Lot: Block: Section:
Zoning: Berkeley County - R1
Parent TMS:
Notes: ETAL: LORRAINE G GRACE
ZZZ GM 2/04/93
VACANT - PARCEL 6/92
ZZZ - 8/95 WB
ZZZ - 5/96, WB
ZZZ - 04-07-98 WB REASSMT
NO CHANGE REASSESSMENT 2004 08/02
\$2,600,000 IS THE CONSID FOR 198-00-00-002, 212-03-01-058, 198-11-01-056 198-11-02-055 & 056
ALSO 7 BOAT SLIPS
NOT ASSIGNED TMS#'S LISTED ON DEED 05/08
REMOVE 'ZZZ' SPECIAL USE FROM PROPERTY 5/2008
VACANT - SALES 5/2008
CHANGE TO 'ZZZ' SPECIAL USE PER ED ROGERS 9/08

Site addresses:

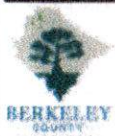
Previous Owner History:

Owner	Sale Date	Sale Price	Deed Book-Page	Plat	Transfer Notes
Owner: CF MASTER LIMITED PARTNERSHIP	12/16/2021	\$0.00	Deed Book-Page: 4088 - 446	Plat: BK O - 71	Transfer Notes: A CONSIDERATION OF \$11,000,000.00 WAS PAID FOR 198-00-00-002, 198-11-01-056, 198-11-02-054, 198-11-02-055 & 212-03-01-058
Owner: PINNACLE HOMES USA LLC	12/14/2021	\$5.00	Deed Book-Page: 4082 - 296	Plat: O - 71	Transfer Notes:
Owner: TRUE HOMES LLC	12/30/2016	\$0.00	Deed Book-Page: 2359 - 287	Plat: BK O - 61	Transfer Notes: A CONSIDERATION OF 1,000,000.00 IS FOR 198-00-00-002, 198-11-01-056, 198-11-02-054 & -055, 198-12-00-014 THRU -040 AND 212-03-01-058.
Owner: CHARLESTON AT PIMLICO LLC	07/02/2015	\$0.00	Deed Book-Page: 11481 - 141	Plat:	Transfer Notes: CONSIDERATION OF 2,570,000.00 IS FOR 198-00-00-002, 212-03-01-058, 198-11-01-056, 198-11-02-054 & -055, AND 198-12-00-014 THRU -040
Owner: LAKE DENNIS PROPERTIES	04/30/2008	\$0.00	Deed Book-Page: 7321 - 0108	Plat:	Transfer Notes: 1.0 LT
Owner: GRACE LORRAINE G & OLIVER R JR	03/04/1992	\$0.00	Deed Book-Page: 0077 - 0189	Plat:	Transfer Notes: 1.0 LT
Owner: POSNER				Plat: O	Transfer Notes: 1.0 LT Recorded on Plat O - 061

56

Web Map

THIS MAP WAS CREATED USING BERKELEY COUNTY GOVERNMENT
GEOGRAPHIC INFORMATION SYSTEM'S PRINT SERVICE



Berkeley County GIS Department
P.O. Box 6122
Moncks Corner, SC 29461
(843) 719-4049
<http://gis.berkeleycountysc.gov>
Date: 11/9/2025

0 0.005 0.01 0.02 0.03 0.04 0.05
1:1,000

0°



THE COUNTY OF BERKELEY AND ITS GIS DEPARTMENT DISCLAIMS
ACCOUNTABILITY FOR THIS PRODUCT AND MAKES NO WARRANTY
EXPRESS OR IMPLIED CONCERNING THE ACCURACY THEREOF.
RESPONSIBILITY FOR INTERPRETATION AND APPLICATION OF
THIS PRODUCT LIES WITH THE USER.



Notice

To adjacent property Owners

The vacant property between 1910 Rock Fish Road and 1908

~~Rockfish Road~~

* ~~TMS #198-11-02-055;~~

1811 Perch Road and 1816 Perch Road

~~TMS # 198-11-01-056;~~

and the terminus/end of Albert Storm Road TMS# 198-11-02-054 will be surveyed in the coming days (if not today).

You may notice stakes, boundary lines and chalk paint. In certain areas close to, on or abutting the above properties. If you have questions or concerns as to the location of these boundary lines please call me at the card attached.

The surveyor can not answer any questions, he has just been contracted to establish the lot dimensions and boundary lines.

If you have any Vehicles, trailers, personal property, construction materials and or structures on the above referenced lots, these items will need to be removed prior to February 28th, 2022 unless given permission in writing

Synergy Capital and Development Group

SYNERGY
CAPITAL AND DEVELOPMENT GROUP, LLC

David Burke
PRINCIPAL

Direct: 843.270.4949

david@scadg.com

520 Folly Road Suite 25-287 Charleston, SC 29412

"Local Projects with Local Purpose"

*Spoke to
offer 40%
for property*

AMY REYNOLDS

BROKER / OWNER

843.806.6085

amyreynoldsbroker@gmail.com

LifestylePropertiesofCharleston.com

767 Coleman Blvd., Suite 5
Mount Pleasant, SC 29464



UNIVERSITY PROPERTIES
OF CHARLESTON, SC

Surveyed Lot

2/17/22



COASTAL
DIMENSIONS
LAND SURVEYING
LLC

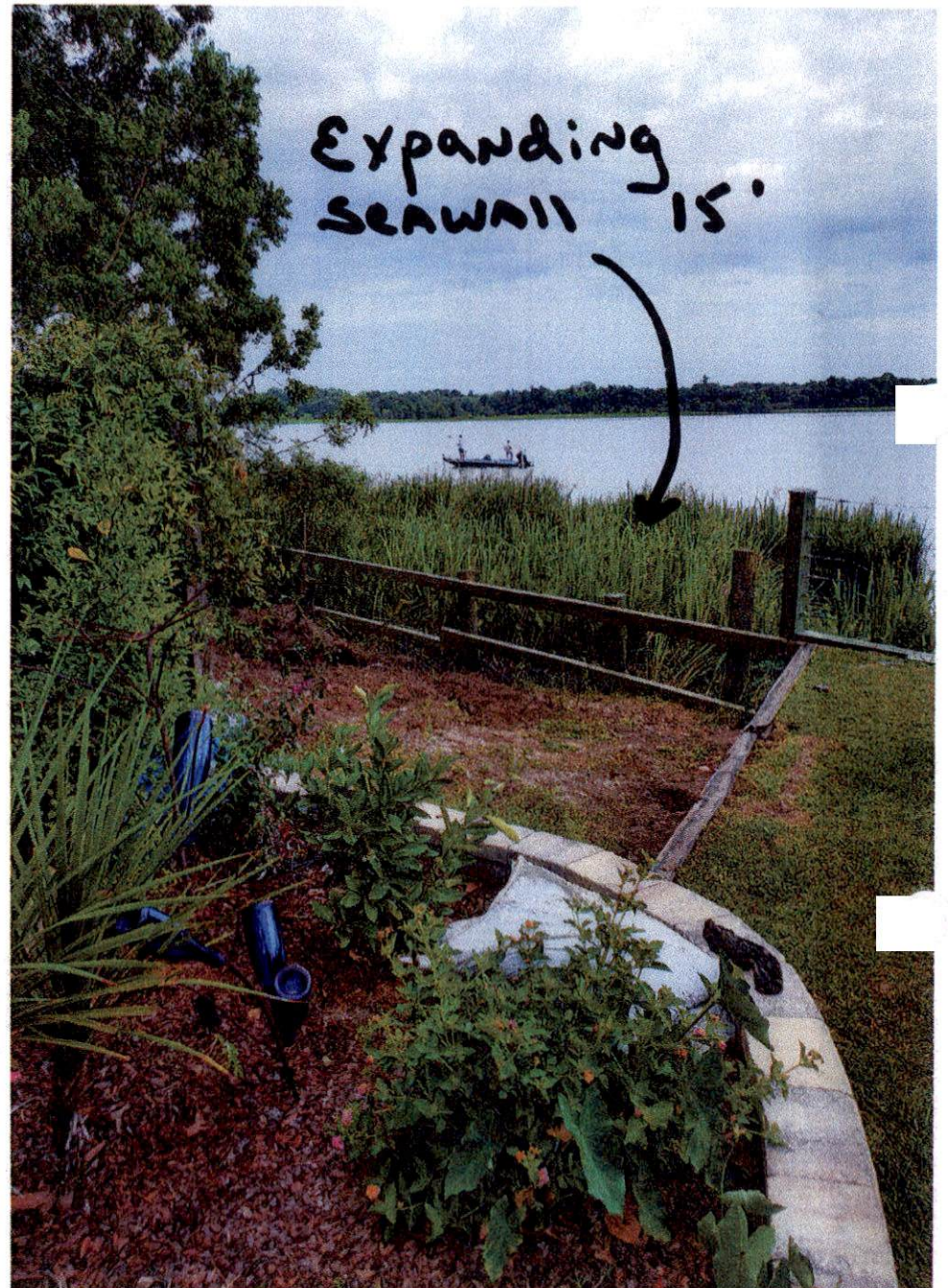
LUCAS STOLTZ, PLS
OWNER

LUCAS@COASTALDIM.COM

MOBILE | 843-530-2771

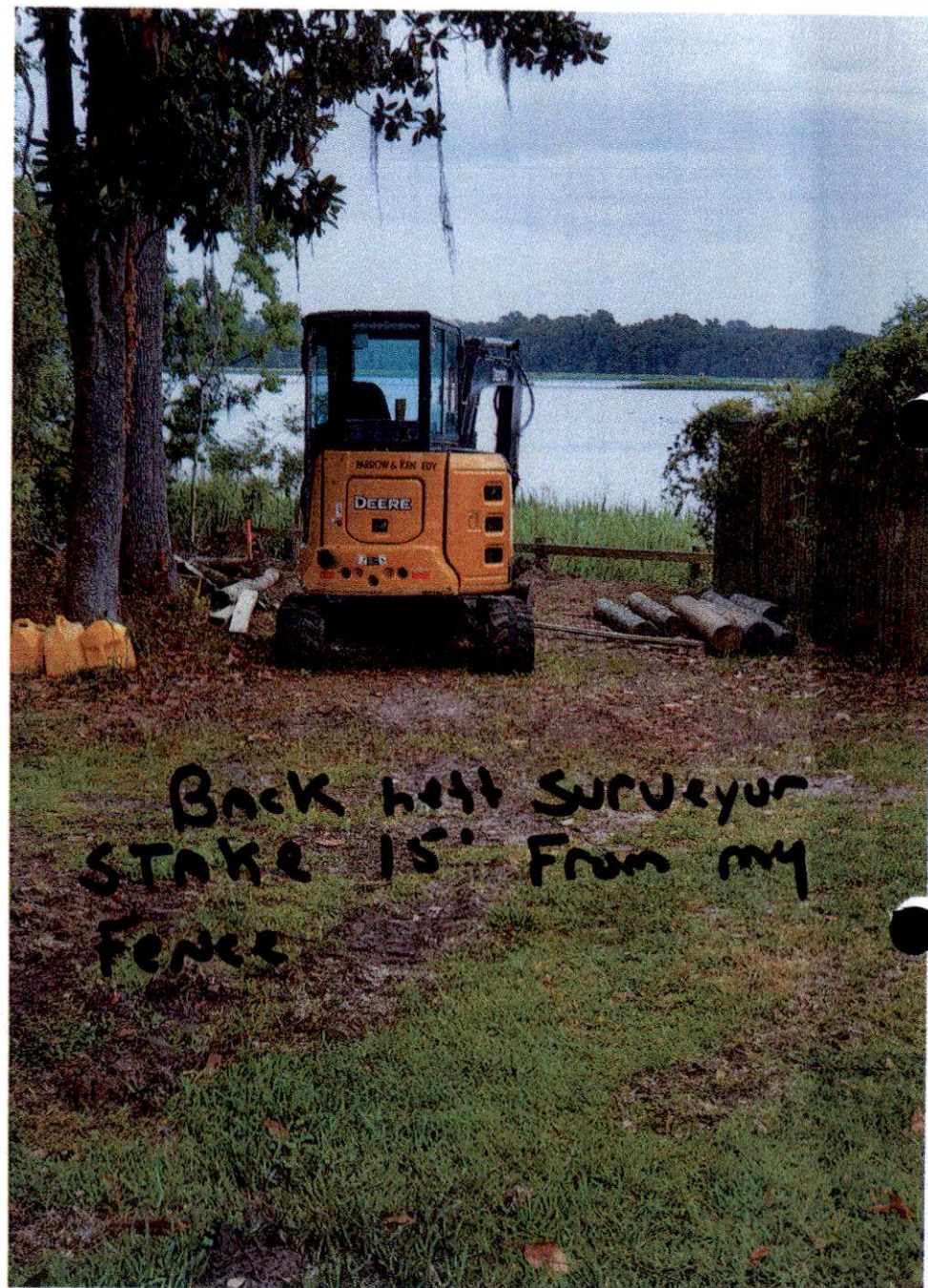
WWW.COASTALDIM.COM

19





Two Front Surveyor
STAKE



Back hole Surveyor
STAKE 15' From my
FENCE

conditioner, toothpaste, toothbrushes, hand lotion, hand sanitizer, pens, note pads, and combs. By your generous donations, contributions, and support, you provide the means to help many others.

Be safe this summer, many thanks to those who work to keep our community free of litter.

PIMLICO RURAL VOLUNTEER FIRE DEPARTMENT

By Deputy Chief Ben Chimmers, 843-637-9837

Pimlico hosted a Firefighter I class on Saturday, May 21 for our new members and for the other fire departments in Berkeley County.

PIMLICO PAGE TURNERS

By Fran Price, 761-1155

Discussion of *The Tobacco Wives*, the 1940s North Carolina period piece on Big Tobacco, centered on the health issues that resulted from smoking and on the glamorous lives the Tobacco barons were able to lead because of tobacco's popularity. The wealthiest families lavished their vast fortunes on great houses and servants, which ensured their positions and power in town. The wives afforded dresses that were original designs and beautifully sewn. Although women had no overt power to control the industry, the story reveals an awakening as they deal with their consciences upon knowing the harmful truths of smoking.

Other books our members are reading: *The Stranger in the Lifeboat* by Mitch Albom

The Invention of Wings by Sue Monk Kidd
The Seven Husbands of Evelyn Hugo by Taylor Jenkins Reid

The Paris Apartment by Lucy Foley
What Happened to the Bennetts by Lisa Scottoline

Book choice for June is *The Magnificent Lives of Marjorie Post* by Allison Pataki. The next meeting will be Monday, June 27, 1:30 at the Community Center. We would love to have you join us and hear about what you are reading. New faces are always welcome!

WELCOME COMMITTEE

By Linda Biglin, 826-9398

The Welcome Committee would love to officially welcome our newest neighbors to Pimlico:

- Reuben Long, 1608 Albert Storm
- Zach and Grayson Johnson, 1700 Redwood Drive
- John and Michelle Purcell, 1501 Churchill

If you are aware of any new neighbors that have not been welcomed to Pimlico and given a welcome packet, please contact Biglinl@gmail.com. We hope our new neighbors love our community as much as we do!

WITH SYMPATHY

By Janelle Halliwell, 761-0703

If you know someone who needs to be included in this column, please contact me, Janelle Halliwell, 843-761-0703 or email whjr5023@yahoo.com. Thank you for your assistance.

THE PIMLICO NEWS

By Trish Rogers, 761-3565

The Pimlico News is published monthly by The Pimlico Civic Club, Inc.

To publish ads or items of interest: Write to *The Pimlico News*, 1603 Pimlico Blvd, Moncks Corner, SC 29461 or use my paper box at 1912 Rockfish Road. Call if you have questions about ads or articles. Classified ads are \$2 for a personal ad and \$5 for a business ad. Make checks payable to: The Pimlico Civic Club, Inc. Deadline is the 25th of each month.

The Pimlico Civic Club, Inc. **Officers/Board of Directors**

Pres. Tom Biglin, 843-826-7773

V. Pres. Kristy Martin, 843-708-1991

Treas. Andy Rickett, 843-761-3555

Rec. Sec. Michele Smith, 803-622-0085

Corresp. Sec. Crystal Odell, 843-343-5945

Board Glenn Emerick, 843-761-0051

Board Michelle Sharp, 843-277-1632

Board Quincy Wilson, 843-761-6214

Board Jamie West, 843-814-2790

Board Eric Bassi, 843-452-2571

Board Claudia Fender, 843-568-4794

Special Tax District

Chair Walt McKinney, 843-761-4612

Sec. Henry Simmons, 843-761-7609

reas. Eric Nash, 843-761-6097

Comm. Tom Antwine, 843-761-5981

Residents Committee

Member Steve Tropia, 321-258-4346

Member Cody Goss, 843-806-7236

Member Horace Kelly, 843-693-9209

Community Center

Claudia Fender 843-568-4794

CLASSIFIEDS



License Plates:
you would like one, come to a Civic Club meeting or call any member of the Pimlico Civic Club Board listed in this newsletter. \$10 each

Carolina Plumbing Repair

- Over 30 years of experience
 - All types of repairs
 - Backflow Specialist
- Randall Lewis

(843) 568-4960 (843) 761-7505

Licensed * Bonded * Insured

Pimlico Resident

SQUEAKY CLEAN

House Cleaning

Free Estimates on weekly, bi-monthly, and monthly cleaning – or just one-time cleaning.

Call Betty @ 843-696-9069



Pimlico Resident

BIBLE STUDIES & END TIME PROPHECY

Go To:

- Bible Prophecy Truth.com
- Amazing Discoveries.org
- Secrets Unsealed.org
- Amazing Facts.org
- BibleInfo.com

Any questions, text 843-991-0752.

History of Threats and Harassment from Tully

1.

11-15-18-This morning I was walking down Albert Storm. (When I walk, I walk facing traffic; however, if a vehicle is coming and nothing is coming from behind, I cross the road and walk facing traffic from the other side so the on-coming vehicle does not have to change lanes.) I saw a vehicle coming toward me so I switched sides. After I had switched sides, the vehicle also started switching sides. It just kept on coming and I had to get all the way down the ditch to get out of the path of the on-coming vehicle. It was Tully and he was hanging out the window of his van screaming profanities. I shot the bird and he stopped and backed up and began yelling profanities-how he had fucked my mother and anything else he could think of. I told him to get out of the van and I would kick his ass. He wouldn't get out but eased on down the street hollering that he had fucked me and my lawyers out of \$30,000.

* 12-5-18 I walked out to my mail box and Tully started hollering down the street at me. He was using all kinds of profanity, telling me how he had been "fucking my wife." His wife walked out their front door and he quit hollering at me.

Sometime in late August of 19, I was driving out of Pimlico on Pimlico Blvd. behind a white van. I recognized the van as Tully's so I slowed down so as not to catch up with him. When we got all the way out to old 52 he got in the left turning lane. I was going straight so I stayed in my lane but pulled up enough that I couldn't look down into his van. Tully backed up, changed lanes and pulled up right beside me (almost hitting my left outside mirror). He put down his passenger side window and started hollering all kinds of profanity. My driver's side window was up, I just smiled at him and when the light turned green I pulled off and left him sitting at the intersection.

* 10-8-19 I was washing my truck in my side driveway. Tully rode by real slow, put down his passenger side window and hollered "hey, you cocksucker" as he slowly drove by. I was over 100 feet away from the street, but he was loud enough that I clearly heard him. What about the rest of the neighborhood?

* 12-3-19 I was at my mail box when Tully was driving down Rockfish. He crossed over to my side of the street and stopped his van right behind me. He had his window down and just started cussing me for everything he could think of. I told him I was tired of his mess and for him to get out of the truck and let's settle this once and for all. He told me "go fuck yourself" and he drove on down to his house.

* 4-27-20. Tully was passing as I was heading to my mail box. When I got to the mail box, Tully was getting out of his van. He hollered "hey cocksucker". I ignored him and he hollered "HEY" but I ignored him again and walked back to the house.

* 5-28-20 I was sitting on my side driveway when Tully rode by real slow with his window down. He was just hollering profanities at me. Luckily, my guest had just left.

7-30-20 I was grilling beside my garage when Tully drove by, heading home, with his black window down. He hollered out real loud "hey, you cocksucker".

8-6-20. I was walking up my side driveway, carrying a hoe and shovel, when I saw Tully creep past in his van. Before I could get up to my side garage door, Tully had gone down the street, turned around and came creeping back by. He put down his driver's side window and just hollering profanities at me. He went down to his house, went inside but left his lights on his truck, so I assumed he was going to leave again. I quickly called my wife and she came out with her phone. She was going to video him as he passed. Shortly he came back by, but didn't put down his window even though I was out where he could see me.

10-2-20 this morning when I was walking, Tully came driving by. He slowed way down-creeping by with his driver's side window down about half way just spewing profanities at me.

10-18-20 Jerry Crumpler and I were out in front of the Community Center working on the marquee when Tully came by real slow just blaring his horn. Jerry asked, what was wrong with that fellow.

10-22-20 I was down working on the Community Center when Tully came by. He started blaring his horn before he got to the fire station next door and blew it way past the Community Center. Tom Biglin, who was working with me, asked "what was all that about?"

1-22-21 Trish and I were riding our bikes. As we were returning home-coming down Rockfish, I saw Tully in his front yard standing behind to his van. We stopped to check our mail and Tully came from behind his van and came down his drive toward the front. He stopped and kept shooting me "the bird". There was no dialog.

4-6-21, I was walking back from the mail box when Tully came creeping by. He put down his window about half way and hollered "you cock sucker" and then drove on down to his house.

7-14-21, I was mowing grass in my front yard. As I approached the road, Tully was coming down Rockfish. He changed lanes coming right along my front lawn. As he got right behind me, he slowed to a creep, put down his window and started hollering all kinds of profanity at me. I gave my mower more gas and pulled away from him. He is such a jerk!

9-1-21, I was at my side garage door feeding my cat. I heard a vehicle so I looked up—it was Tully. He put his side window down about half way and hollered "ass hole" Tully really must be sick-his actions are not normal!

12-10-21 Trish and I were getting in my truck when Tully went by real slow. I gave him time to get on down the road and I pulled out of my yard. Shortly I found Tully driving really slow-going thru Pimlico. Trish told me to hang back and let Tully go. I did and Tully drove real slow

3.

down Albert Storm and then Pimlico Blvd. He then pulled off at the Community Center and I went by. He pulled out behind me and ran right up on my tail and stayed this way all the way to the stop light at Old 52. He pulled left in the turning lane, but I caught the green and shot straight thru the intersection. Tully was coming up on the left and just started blowing his horn. Trish told me that Tully must be bi-polar because he was always acting crazy.

* 2-24-2022 My wife and I were loading our car for a road trip to New Bern NC Tully comes by real slow hanging out his truck window. He hollers really loud "hey you cock sucker" This fellow must be sick!

* 5-20-22 As I was walking down Rockfish from the park toward my house, Tully came driving by real slow, put down his window and stranded hollering profanities at me. He parked in his drive, came out to the road and continued his tirade and kept threatening to put his foot up my "tired old ass". He told me that if I came back to his end of the street, he would really show me what an ass cutting was.

video

* 7-22-22 My son had borrowed my truck and returned it today. When he got here he asked me if Tully owned a silver SUV. I told him yes, but why did he ask? Ed told me that this SUV came up on his tail out on Pimlico Blvd. and tailgated him all the way in. Ed said not just tailgating, but right up on his back bumper until he turned on to my drive. Tully couldn't see through the tinted back glass and probably thought it was me driving my truck.

* 7-26-22 About three weeks ago sometime between midnight and 5AM, I was startled awake by three very loud knocks on my front door. I don't mean regular knocks-it sounded like someone was trying to knock the door in. I jumped out of bed, grabbed my pistol and went to the front door. However, I couldn't see anyone. STRANGE! Today I was in the front yards and Tully came creeping by, I spoke (waved) to him. He put down his passenger side window about half way and hollered "KNOCK, KNOCK. At first, I thought that Tully had finally fully lost his mind. However, after thinking about it, I wondered if Tully was trying to let me know he was the ghost that had knocked on my door a few weeks ago?

Door Camera?

* 8-16-22 Earlier today I was working on the light between my two garage doors. I heard a car horn blow so I turned around facing the street. Tully had his passenger window down about 1/2 way as he crept by the front of my house. He was shooting me the birds and hollering all kind of nasty stuff about my mother. I fully believe this man is sick in the head and most likely dangerous.

* 12-8-22 My neighbor Holly Bell had been visiting and as she was leaving, she hollered back and said someone had destroyed my mail box. Upon examination I found the front door/lid had been bent back under the mail box-both hinges were broken. This was not hit by the mailman or someone because it wasn't bent to the side, but deliberately bent straight back under the support.

I have no way of knowing who did this, but Tully is obsessed with being mean and downright ugly to me every chance he gets.

12-13-22 My cat "Freddie" has disappeared-been missing for a couple of days. Today I was racking the leaves in my front yard, Tully was helping load lumber that had been used to form some concrete he had just poured. His new gate was open so they could bring the lumber threw. Later I was still working in my front yard and looked down towards Tully's and saw a new wire small animal trap sitting right in front of his gate that just been open several minutes before. This trap was right in the way of the gate and appeared to have been placed right out in front so I would be sure to see it. I don't know for sure, but could Tully be trying to tell me that he "had taken care of Freddie"?

12-20-2022 Someone has broken my mailbox again since yesterday's delivery. When I went to get my mail today, I found the lid bent straight back under the box again, I plan to get a camera.

3-7-23 I was out in front of our garage doors changing the IPTAY stickers on our cars when I heard someone holler "hey asshole". I looked up and saw Tully creeping by. He had his window down and was "shooting me the birds". This fellow must be sick, he just won't quit.

5-3-23 Well it has happened again, Some A-hole has beat up my mail box again. This is done from the ground, not a vehicle because, same as twice before, the front lid is broken straight back under the mail box. Plus, this time, it looks like they hit each side with a baseball bat. Pictures are available. After the previous occasion, I set up a camera; however, the SD card had maxed out on 4-25-23.

5-10-23 Well he has done it again! As Trish and I were heading out on Bass, Tully turned off Albert Storm onto Bass. When he saw our car he moved across the center line onto our side of the road heading straight towards us, I held my course and at the last minute he whipped back on to, his side of the road. Trish said "I really think he is trying to wreck us."

11-14-23 When I went to my mail box this afternoon, Tully was in his front yard watering a tree he had transplanted. When he looked up and saw me, I waved a friendly neighborly wave. He shot me the bird and shouted "fuck you and your mother" I responded by telling him to "come down here and tell me that." He started his tirade about fucking my mother in the mouth and she spit me out. He was still hollering his filth when I turned around and walked back to my house. I am really getting tired of his foul mouth. We really don't need his trash in our neighborhood.

2-26-2024 Recently I cut down a small dead tree in my front yard. My neighbor, Jim Henderson was going to help me load the stump onto my truck. I pulled the stump out on the street so he could get his small track hoe up to it and load the stump on my truck. When I dragged the stump out on the street it left a good bit of dirt on the street. Later, I was out in the street with my backpack blower cleaning up the street. Earlier I had seen Mrs. Tully in the front yard with her

SUV; therefore, I kept looking back to make sure I wasn't in her way if she was going out. The next thing I knew, Tully had pulled the SUV right up behind me and sat down on his LOUD horn. It scared me so bad that I latterly wet my pants. He then pulled around me and shot me the bird as he went by. He really is one sick fellow!!! He is so deranged I am beginning to fear for my life!

* 4-25-24, Trish and I just returned from a few days at the beach. While we were gone, our neighbor, Mike Shealy picked up our mail. He owns a white F-150 very similar to mine. Mike told me earlier this week he stopped at our mail box to get our mail and noticed Tully coming down the street in his van. Mike said Tully crossed over to his side of the street and pulled up right beside him—close enough that Tully almost hit his outside mirror. Tully had his window down so Mike put his down and asked Tully "what the fuck do you want?" Tully clearly showed surprise and quickly pulled off. Mike went on around the cull de sac and went home.

* 11-26-24 It has been a while since Tully showed this stuff. Today I was standing in my front yard raking leaves. Along came Tully in his white van—he put down the window about half way, struck his arm out and shot me the "bird" from one side of my yard all the way across the front to the far side. He appeared to have a bandage on this finger. This sick fellow just can't quit!

12-27-24 A couple of weeks ago I was coming into Pimlico on Pimlico Blvd while driving my truck. As I was approaching Pimlico, I recognized Tully's van approaching me. All of a sudden, he moved across the middle line, about half a truck width heading straight to me. I held my course in my lane, wondering if this would be the time he wrecked me. At the very last minute he whipped back across into his lane. Each time he gets closed to a head-on collision!

* 1-30-25 I was raking leaves in my front yard, needed a new bag and was headed to the garage to get one when I heard a vehicle greatly accelerating. I turned around and realized it was Tully coming down Rockfish at a fast clip. When he got to our property, he slowed down to a snail's pace, put his window down about half way and started his tirade of cussing me for all types of "mother fuckers and cock suckers"

1-30-25 Later in the day I was going thru Goose Creek on US 52, I came up behind a SUV that looked like Tully's. I moved to the right and went around it in the middle lane. Shortly, I saw this same SUV accelerating up the far right lane, came up beside me when I realized it was Tully and a female (I assume it was his wife). All of a sudden, he switched lanes back to the left, cutting me off by a fraction of an inch. If I had braked hard, he would have taken the front off my truck! This fool is hell bent on harassing me—maybe even hurting me!

* 9-16-25. I was out beside the road painting my mail box. I heard a noise and looked up. I saw Tully coming straight at me on the wrong side of the road—he was too close for me to relocate. He slowed right beside me and hollered "you cock sucking mother fucker" Trish was coming out our front door and saw Tully, but too far away to hear what he said. I am sick and tired of his constant harassment.



10-8-25 Late this afternoon I was cleaning off the drive where I had blown grass during my earlier grass mowing. I hear a noise so I looked up and saw Tully coming down Rockfish. He had crossed over to my side of the street, clipped the edge of my front yard and pulled up about 2 feet from me as I stood in my drive. He had his window partially down and started his normal tiered calling me a mother fucking cock sucker while shooting me the finger. He didn't stop or I would have hit him with something! This has gone on way too long-it has to stop before I hurt him! I called the Sheriff's Department and requested they send a deputy out so I could file an official complaint. A deputy came out a little later (Deputy Poland). He listened to my complaint, never wrote anything down, asked if Tully was home and I told him yes. I asked him for his card and told him I would be down in a couple of days to get a copy of his report. He had no cards, but gave me his name and case number on a scrap of paper. I plan to take copies of my three complaints down to see if I can get a Restraining Order. This has gone on way too long and something has to be done. I told Deputy Poland that if the Sheriff's Department didn't do something, I was! I noticed that Deputy didn't go down to talk with Tully.



10-10-25 Trish and I were in my truck. As we pulled to the end of our drive, we had to wait for Tully to pass before we could pull out on Rockfish. Tully pulled way over on our side of the street, put his window down about half way, put his hand out and shot us the bird. Trish said "I wish I had my camera out". "This is about enough of his stuff". I agree. I have had it with this clown!

AGENCY I.D.
SC0080000

INCIDENT REPORT
Berkeley County Sheriffs Office
APPROVED (Lieutenant Daniel Morton)

CASE NUMBER

202205004597

NCIC
INTD

EVENT	INCIDENT TYPE				COMPLETED ☒ YES ☐ NO	FORCED ENTRY ☐ YES ☐ NO	PREMISE TYPE 20(Residence/Home)	UNITS ENTERED	TYPE OF LOSS ☐ Individual ☐ Business ☐ Financial ☐ Government ☐ Relig. Orgn. ☐ Soc./Public ☐ Other ☐ Unknown ☐ Police Off.																																																																						
	1. Information				☒ YES ☐ NO	☐ YES ☐ NO																																																																									
	2.				☐ YES ☐ NO	☐ YES ☐ NO																																																																									
	3.				☐ YES ☐ NO	☐ YES ☐ NO																																																																									
VICTIM NO. 1	INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER) 1908 ROCK FISH RD, MONCKS CORNER, SC						ZIP CODE 29461-	WEAPON TYPE																																																																							
	INCIDENT DATE 05/20/2022	24 HR. CLOCK 16:40	TO DATE 05/20/2022	24 HR. CLOCK 16:55	DISPATCH DATE/TIME 24 HR. CLOCK DISP. DATE 05/20/2022		DISP. TIME 17:31	TIME ARRIVED 17:54	DEPART. TIME 18:01																																																																						
	COMPLAINANT'S NAME (LAST, FIRST, MIDDLE) Tully, Terrance				RELATIONSHIP TO SUBJECT #1 #2 #3 * J S O U	RESIDENT * J S O U	RACE W	SEX M	AGE 65	ETH. N																																																																					
	ADDRESS				CITY Moncks Corner		STATE SC	ZIP CODE 29461-	LOCATION NO.																																																																						
	VICTIM'S NAME (LAST, FIRST, MIDDLE) Tully, Terrance				RELATIONSHIP TO SUBJECT #1 #2 #3 * J S O U	RESIDENT * J S O U	RACE W	SEX M	AGE 65	ETH. N																																																																					
	HEIGHT 6'02"	WEIGHT 210	HAIR BRO - Brown	EYES HAZ - Hazel	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.																																																																										
	ADDRESS 1908 ROCK FISH RD.				CITY Moncks Corner		STATE SC	ZIP CODE 29461-	LOCATION NO.																																																																						
	VISIBLE INJURY (VICT. 1) ☐ YES ☐ NO ☐ EXPLAIN -				COMPLAINT OF NON-VISIBLE INJURIES: ☐ YES ☒ NO																																																																										
	VICTIM (NO. 1): NONE ☒ USING: ALCOHOL ☐ DRUGS ☐ TYPE:																																																																														
	TWO-MAN VEH. ☐ ONE-MAN VEH. ☐ DETECTIVES PLASMT. ☐ OTHER ☐				ALONE ☐ ASSISTED ☐ * J - This Jurisdiction S - State O - Out of State U - Unknown																																																																										
SUBJECT NO. 1	☐ SUSPECT NAME (LAST, FIRST, MIDDLE) Rogers, Edwin				RACE W	SEX M	AGE 78	ETH. N	DATE OF BIRTH																																																																						
	☐ RUNAWAY				FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.																																																																										
	☐ WANTED				ADDRESS																																																																										
	☐ WARRANT				CITY																																																																										
	☐ ARREST				STATE																																																																										
	☐ JAIL				ZIP CODE																																																																										
	☐ SUMMONS				LOCATION NO.																																																																										
	SUBJECT (NO. 1) USING: ALCOHOL ☐ COMPUTER EQUIP. ☐				ARRESTED NEAR OFFENSE SCENE ☐ YES ☐ NO ☒																																																																										
	DRUGS ☐				DATE/TIME OF OFFENSE 05/20/2022 16:40																																																																										
	TOTAL # ARRESTED 0				DATE/TIME OF ARREST																																																																										
NARRATIVE	On May 20, 2022 I Deputy Moorefield responded to 1908 Rock Fish Rd. in reference to trespassing. Upon arrival I spoke with Terrence Tully who stated that one of his neighbors came onto his property without permission. Mr. Tully stated that his neighbor Edwin Rogers walked onto his property while his wife was home, and started taking pictures. Mr. Tully has video evidence of Mr. Rogers coming onto his property. Mr. Tully stated when he arrived home a short time later, he saw Mr. Rogers walking off of his property and when asked if he needed help, Mr. Rogers flipped him off and cursed Mr. Tully out. Mr. Tully then drove into his driveway and did not confront Mr. Rogers anymore and went inside his residence. Mr. Tully wanted a report to be done, and was issued a case number and advised him on how to obtain a copy of the report. I then tried to contact Mr. Roger but he did not come to the door. There is no further information at this time.																																																																														
	JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY				JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY																																																																										
	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>TYPE (GROUP)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>TOTAL VALUE</td> </tr> <tr> <td>STOLEN</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>DAMAGED</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>BURNED</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>RECOVERED</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>SEIZED</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>COUNTERFEIT</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>									TYPE (GROUP)									TOTAL VALUE	STOLEN										DAMAGED										BURNED										RECOVERED										SEIZED										COUNTERFEIT									
	TYPE (GROUP)									TOTAL VALUE																																																																					
	STOLEN																																																																														
	DAMAGED																																																																														
	BURNED																																																																														
	RECOVERED																																																																														
	SEIZED																																																																														
	COUNTERFEIT																																																																														
SUBJECT IDENTIFIED ☒ YES ☐ NO ☐																																																																															
SUBJECT LOCATED ☒ YES ☐ NO ☐																																																																															
☐ ACTIVE ☒ ADM. CLOSED ☐ UNFOUNDED																																																																															
☐ ARRESTED UNDER 18 ☐ ARRESTED 18 AND OVER																																																																															
☐ EX-CLEAR UNDER 18 ☐ EX-CLEAR 18 AND OVER																																																																															
REASON FOR EXCEPTIONAL CLEARANCE: 1. ☐ OFFENDER DEATH 2. ☐ NO PROSECUTION 3. ☐ EXTRADITION DENIED 4. ☐ VICTIM DECLINES COOPERATION 5. ☐ JUVENILE - NO CUSTODY																																																																															
REPORTING OFFICER(S) 6891 - PFC Connor Moorefield																																																																															
DATE 05/20/2022																																																																															
UNIT NUMBER 4444 - Lieutenant Daniel Morton																																																																															
APPROVING OFFICER 05/23/2022																																																																															
FOLLOW-UP INVESTIGATION ☐ YES ☒ NO																																																																															

STATE OF SOUTH CAROLINA
COUNTY OF BERKELEY

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NUMBER: 2017-CP-08-954

TERRANCE TULLY,
Plaintiff,

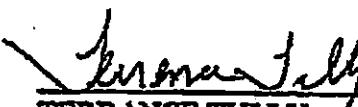
vs.

EDWIN D. ROGERS AND THE
PIMLICO CIVIC CLUB, INC.,
Defendant.

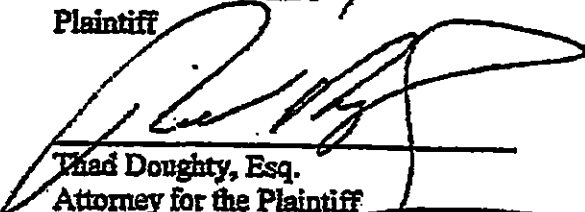
SETTLEMENT AGREEMENT

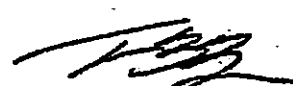
WHEREAS, the parties have resolved this action between them, it is agreed by the parties and counsel that in exchange for payment of \$29,000.00, which involves all costs, disbursements, attorneys fees and any damages of any sort arising from this action, the Plaintiff, Terrance Tully, will execute a binding release, which document (and accompanying court order, if applicable) shall be prepared by the attorneys for the Defendant.

This Agreement is binding upon all parties to this matter, and is enforceable in any Court of law.


TERRANCE TULLY
Plaintiff

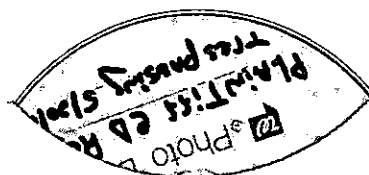
4/9/18
Date


Thad Doughty, Esq.
Attorney for the Plaintiff


Tommy Boger, Esq.
Attorney for Defendant


Trey Nicollette, Esq.
Attorney for Defendant

DVD
Exhibit M



Free Day Pickup

Envelope #: 254504
Order #: 99050394
Store: MALCREEK
Archive DVD: 7

1620347-0000
©2003 Walgreens
WVC-990413

