

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

Pet Helpers, Inc.,

Plaintiff,

vs.

Janet Frisco,

Defendant

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-10-02682

**MEMORANDUM IN SUPPORT OF  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

**RECEIVED**

**Apr 13 2022**

**SC Court of Appeals**

The grounds for this motion and relief sought are detailed in Plaintiff's Motion for Partial Summary Judgment. Plaintiff submits the Memorandum in Support of Partial Summary Judgment to expand upon events that have transpired and court rulings that have been made since Plaintiff filed its motion.

**BACKGROUND**

On April 13, 2021, Defendant relinquished ownership of a dog to Plaintiff. On May 8, 2021, the canine was adopted by a third party. After the adoption, Defendant published dozens of social media posts and videos, and protested in front of Plaintiff's business, falsely claiming that:

- a) Plaintiff and/or its staff killed her dog;
- b) Plaintiff and/or its staff euthanizes other animals in its shelter;
- c) Plaintiff and/or its staff was cruel to her dog;
- d) Plaintiff and/or its staff is cruel to other animals in its shelter; and
- e) Plaintiff faked/staged the dog's adoption.

Additionally, Defendant sent numerous emails to third parties, including the Post & Courier, making the same false claims regarding Plaintiff.

## PROCEDURAL HISTORY

On June 16, 2021, Plaintiff filed its Motion for Partial Summary Judgment. Six months later, Plaintiff's Motion for Summary Judgment was scheduled to be heard on December 17, 2021. In her return to Plaintiff's Motion for Summary Judgment, Defendant claimed to need additional time to complete discovery. Therefore, to afford Defendant additional two months for her to engage in discovery, Plaintiff voluntarily moved to continue the summary judgment motion. However, since the original hearing date of December 17, 2021, Defendant has not engaged in discovery.

### **Plaintiff's Complaint & 1<sup>st</sup> Restraining Order Against Defendant**

On June 9, 2021, Pet Helpers, Inc. initiated this action with the filing of a Summons, Complaint and Motion for Emergency *Ex Parte* Restraining Order. On June 11, 2021, this court issued an *Ex Parte* Restraining Order and Injunction against Defendant enjoining her from making the false claims set forth above. Thereafter, on June 17, 2021, the court issued and filed a Temporary Restraining Order and Injunction after a hearing was held the same day.

### **Defendant's Complaint and Consolidation**

On June 17, 2021, Defendant filed a Summons and Complaint in the matter of Janet Frisco v. Pet Helpers, Inc., Case Number 2021-CP-10-2848. Upon the Motion of Pet Helpers, Inc., the matter of Frisco v. Pet Helpers, Inc. was consolidated with this action by order of this court filed January 6, 2022.

### **2<sup>nd</sup> Restraining Order Against Defendant**

On October 12, 2021, this court issued a 2<sup>nd</sup> Order for Injunction and Temporary Restraining Order expanding the prohibitions listed in the 1<sup>st</sup> Order for Injunction and Temporary Restraining Order. Additionally, this court sanctioned Defendant in the amount of \$5,434.34.

### **Defendant's Contempt of Court**

On November 5, 2021, this court held in contempt for violating the 1<sup>st</sup> and 2<sup>nd</sup> Restraining Orders more than eighty (80) times and sentenced her Defendant to thirty (30) days in jail purgeable upon payment of \$5,434.32 to Plaintiff's counsel. Defendant spent approximately four days in jail before paying the sanction.

### **Defendant's Failure to Comply with Order of Discovery**

For nine months, Defendant has refused to answer Plaintiff's Interrogatories and Requests for Production that were due on or before July 23, 2021. On December 17, 2021 this court ordered Defendant to respond to Plaintiff's discover by January 17, 2022 and financially sanctioned Defendant for her unwarranted refusal to cooperate in the discovery process. On January 18, 2022, and several times thereafter, Plaintiff's counsel wrote to Defendant asking her to comply with the court order compelling Defendant's discovery responses. Defendant still refuses to comply with the order compelling discovery. Thereafter, on January 21, 2022, Plaintiff filed a Motion for Sanctions for Defendant's Failure to Comply with the Order Compelling Discovery.

### **Defendant's Appeal**

Defendant untimely appealed an injunction/restraining order. Therefore, on March 2, 2022, the Court of Appeals dismissed her appeal.

## **LAW/ANALYSIS**

### **STANDARD OF REVIEW**

Summary judgment is appropriate "if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." Rule 56(c), SCRCP. "[T]he evidence and all reasonable inferences therefrom must be

viewed in the light most favorable to the non-moving party." Osborne v. Adams, 346 S.C. 4, 7, 550 S.E.2d 319, 321 (2001).

To oppose a motion for summary judgment, "the nonmoving party must demonstrate the likelihood that further discovery will uncover additional relevant evidence and that the party is 'not merely engaged in a fishing expedition.'" Dawkins v. Fields, 354 S.C. 58, 69, 580 S.E.2d 433, 439 (2003) (quoting Baughman v. American Tel. and Tel. Co., 306 S.C. 101, 112, 410 S.E.2d 537, 544 (1991)). Moreover, to oppose a summary judgment motion, "it is not sufficient for a party to create an inference that is not reasonable or an issue of fact that is not genuine." Town of Hollywood v. Floyd, 403 S.C. 466, 477, 744 S.E.2d 161, 166 (2013).

**I. THE COURT SHOULD GRANT PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT REGARDING PLAINTIFF'S CLAIMS BECAUSE DEFENDANT SQUANDERED HER ADDITIONAL TIME TO ENGAGE IN DISCOVERY AND BECAUSE FURTHER DISCOVERY WILL NOT UNCOVER ADDITIONAL RELEVANT EVIDENCE.**

On July 7, 2021, Defendant served Requests to Admit on Plaintiff, and Plaintiff answered on July 9, 2021. In the past nine months, Defendant has not sought any additional discovery. Nevertheless, during the hearing on December 17, 2021, Plaintiff voluntarily continued its Motion for Summary Judgment to give Defendant additional time to complete discovery. Instead of engaging in discovery, Defendant has spent her time repeatedly claiming that Plaintiff committed "fraud" and that Plaintiff's undersigned counsel "concealed evidence" and made "false statements in legal documents and during hearings," and that the court system is corrupt. Not only has Defendant failed to assert a claim or defense that is recognized under South Carolina law, Defendant has not produced even a scintilla of evidence to substantiate any of her allegations. As is well-settled under South Carolina law, our courts do not allow cases to proceed to trial based on "speculation and conjecture . . . ." McKnight v. S.C. Dept. of Corrections, 684 S.E.2d 566, \_\_\_\_

385 S.C. 380, 389 (S.C. Ct. App. 2009). Here, Defendant’s allegations go beyond speculation and conjecture and are, in a word, irrational.

**II. THE COURT SHOULD GRANT PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT REGARDING DEFENDANT’S CLAIMS BECAUSE THERE IS NO CAUSE OF ACTION ARISING FROM DEFENDANT’S TRANSFER OF OWNERSHIP OF THE DOG TO PLAINTIFF.**

The gravamen of Defendant’s claims and defenses can be summed up by the follow allegation - “I suffered severe depression and grief and am still suffering due to the separation [Plaintiff and Melissa Susko] needlessly created by not returning the dog to me.” Essentially, Defendant is seeking damages because she is remorseful that she gave the dog to Plaintiff for which there is no legal claim under South Carolina law. Indeed, Defendant admits she transferred ownership of the dog to Plaintiff. Although Defendant refuses to answer interrogatories and requests for production, Defendant did answer Requests for Admission in July 2021 and responded “I admit I legally transferred complete ownership of the dog Toby/Slim Jim to Plaintiff . . . .” (emphasis added). **(Exhibit A – Defendant’s Answers for Requests for Admission).**

Defendant also claims that she was unaware that the dog would be featured during a “low cost” adoption event. What Defendant is implying is that Plaintiff somehow acted wrongfully in lowering its typical adoption fees to encourage people to adopt several animals including the canine in issue. Stating another way, Defendant feels that people of less financial means should not own a dog. Regardless of Defendant’s feelings, Defendant has neither standing to complain nor does she assert a recognizable claim under South Carolina law. As the owner of the dog, Plaintiff could make its own determination regarding potential adoptees for the dog.

Lastly, Defendant now claims that the adoption of the dog was “fraudulent.” Defendant theorizes that Plaintiff allowed one of its employees to adopt the dog to thwart Defendant’s request to reclaim the dog. In this case, the dog was adopted by a third party who is not one of Plaintiff’s

employees. (**Exhibit B – Affidavit of Melissa Susko, Director of Pet Helpers** and **Exhibit C – Affidavit of John Blaine, Employee of Pet Helpers**). Assuming, *arguendo*, that Plaintiff permitted an employee to adopt the dog, Defendant still has not stated a viable cause of action under South Carolina law against Plaintiff.

As the legal owner of the dog, Plaintiff had the absolute right to exercise its own judgment and discretion to decide who could adopt the dog. Defendant was not an ideal candidate to reclaim/adopt the dog Defendant surrendered because Defendant already was overwhelmed with caring for seven other dogs and was considering surrendering an additional dog to Plaintiff. On Plaintiff's "Surrender Form," dated April 13, 2021, Defendant was asked "Please explain why you are surrendering this dog." Defendant replied "I have seven other dogs at this time. I don't have the time to give him attention or train." (**Exhibit B – Surrender Form**). Additionally, on April 30, 2021, Defendant emailed Plaintiff that she had a second dog she wished to surrender to Plaintiff. Specifically, Defendant wrote "I have a young small female beagle I rescued and need to surrender." (**Exhibit D – Email from Defendant**). Ultimately, Defendant was highly unsuitable to adopt/reclaim the dog she surrendered to Plaintiff.

### CONCLUSION

There is no genuine issue of material fact that Defendant published, both orally and in writing, defamatory statements that are actionable *per se* regarding Plaintiff and that Defendant published these statements with malice. Additionally, Defendant has not made any claims or defenses that are recognized under South Carolina law nor has she provided a scintilla of evidence to support any of her allegations. Therefore, Plaintiff respectfully requests that this court grant Plaintiff partial summary judgment as follows:

1. Dismissing Defendant's claims against Plaintiff and Melissa Susko, individually;
2. Issuing an order that, as a matter of law, Defendant's statements, both written and verbal, are defamatory statements regarding Plaintiff that are actionable per se;
3. Issuing an order establishing that Defendant is liable to Plaintiff for damages in an amount to be determined at trial;
4. Issuing a Permanent Restraining Order and Injunction as follows:
  - a) Prohibiting Defendant from making any statements, written or verbal, regarding this lawsuit, the parties involved, or their legal counsel, stating or implying that Plaintiff or its staff euthanized the dog, that Plaintiff or its staff mistreated the dog in any way, that Plaintiff or its staff euthanizes other animals, that Plaintiff or its staff mistreats the animals in their care in any way, or that Plaintiff or its staff stages fake adoptions to generate funds;
  - b) Prohibiting Defendant from contacting Plaintiff and its staff;
  - c) Prohibiting Defendant from coming onto Plaintiff's property; and
  - d) Prohibiting Defendant from attempting, directly or indirectly, to contact the dog's owner.

FUTERAL & NELSON, LLC

s/ Stephan V. Futeral  
Stephan V. Futeral  
S.C. Bar ID 66427  
1004 Anna Knapp Blvd, Suite 3  
Mt. Pleasant, South Carolina 29465  
Telephone (843) 284-5500  
Facsimile (843) 284-5501  
email to: sfuteral@charlestonlaw.net

Dated: April 12, 2022

Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

The foregoing document *Memorandum in Support of Motion for Partial Summary Judgment* was served on the following by email and U.S. Mail with sufficient postage affixed, this 12<sup>th</sup> day of April, 2022:

Janet Frisco  
203 Cardinal Drive  
Summerville, SC 29485  
Janetfrisco@yahoo.com



---

Stephanie M. Smith  
Paralegal to Stephan V. Futeral, Esq

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
CASE #:2021-CP-10-2682

PET HELPERS, INC.,

Plaintiff,

vs.

JANET L. FRISCO,

Defendant.

**DEFENDANTS ANSWERS TO PLAINTIFF'S  
REQUESTS TO ADMIT.**

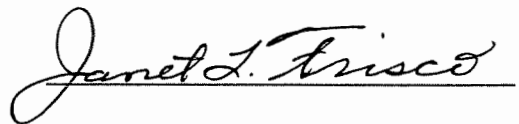
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CLERK OF COURT

1. I admit I legally transferred complete ownership of the dog Toby/Slim Jim to Plaintiff but I deny I gave permission to euthanize him.
2. I admit that I made a public statement on Facebook that Plaintiff "hurt Toby. They made him suffer."
3. I admit that on June 9<sup>th</sup> or at some time, I stated during a video post on Facebook, "I'll expose all this evil around me, what happened to my dog at Pet Helpers, those people that were smiling in my face and lying through their teeth, and euthanized that beautiful dog..."
4. I admit that I made a public statement on Facebook that Plaintiff's Executive Director, Melissa Susko, "has euthanized other dogs or ordered that they be euthanized even though they were not sick or aggressive."
5. I admit I made a public statement on Facebook that Plaintiff "killed [Toby/Slim Jim] because they didn't adopt him to anyone. They killed him and I know they did."
6. I admit that I made a public statement on Facebook that Plaintiff "killed Slim Jim May 11<sup>th</sup>... and I'm not going to stop (protesting) until first of all these people, a bunch of people here, Melissa, Katie, and intake and anybody else that knew and they guy who killed him, anybody else, they'll all be fired. If this company cares any and all this place place will be shut down and reopened by somebody who really cares about animals...but it's really a kill shelter."
7. I admit I carried a sign on Folly Road that provided "Pet Helpers killed Slim Jim May 11<sup>th</sup>."
8. I admit that I made a public statement on Facebook that Plaintiff "used [Toby/Slim Jim] as a marketing tool to solicit donations and then euthanized him after they staged an adoption the weekend of May 7-11, 2021."
9. I admit that third parties commented, viewed, and shared my Facebook posts referenced.
10. I deny that on June 16, 2121 I wrote to Plaintiff's counsel, "I plan to file a civil action of my own if Toby is not returned to me immediately". I did not say if "Toby is not returned to me immediately" and counsel cannot produce an email that says that I made that statement.
11. I admit that I have publicly called Plaintiff vile, evil, heartless, cruel, greedy, deceitful and malicious.
12. I deny that "forcing Plaintiff to somehow return Toby/Slim Jim to me is my paramount reason for engaging in this lawsuit". I suffered horrible distress and so did Toby from the treatment we

received at Pet Helpers and I want to make sure no unsuspecting person or pet ever has to go through this kind of agony at their hands again.

13. I deny that I am willing to risk violating the court's restraining order and that I will not stop my actions, as alleged in the complaint, until Toby/Slim Jim is returned to me. I never said that I would risk violating the restraining order verbally or in writing. My complaint does not allege that I want the dog returned to me and counsel cannot produce an email that states any of these accusations.
14. I admit that I said I would bring "God's army" to Plaintiffs business while speaking to Melissa Susko on the phone after she became rude when I asked why they adopted Toby to someone else when I had already submitted an application.
15. I admit that I said they would face a "public backlash" for they way they had treated us, but I deny I said "if they didn't give my dog back". Counsel cannot produce an email where I stated the backlash would be because they wouldn't give the dog back.
16. I admit that I was unable to comply within hours of being served the EX PARTE RESTRAINING ORDER because of the extensive groups, posts, social media outlets, etc. that I had used and my lack of expertise on Facebook.
17. I admit that on June 16,2021 I posted a comment on Reddit.com in response to someone's negative comment about me. I admit that I said Melissa Susko had killed at least two dogs named "Dixie" and "Cody".
18. I admit that I inadvertently violated the *EX Parte* order when I said I had information Melissa Susko had killed at least two dogs named Dixie and Cody responding to a comment on Reddit.
19. I admit that in June 2021, I sent through Messenger a message to people who had "liked" posts about Toby's adoption the following message: "Pet Helpers had allowed Toby to suffer for a month, that Plaintiff staged an adoption with one of Plaintiff's employees, and that Plaintiff euthanized Toby/Slim Jim after the "Bissel adoption event in May 2021". I still believe Melissa Susko ordered an employee, John Blaine, to "adopt" Toby and I believed they had euthanized him shortly after. His chip that I had inserted and gave to them the day of his surrender was not registered on May 8<sup>th</sup> per normal procedure. They did not send me the video proving he was alive until June 16, 2021. I also believe he would have been euthanized right after the "adoption" if I had not become active in exposing Melissa's Susko's scheme to the public.

Dated: 7/7/21

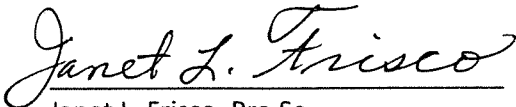


Janet L. Frisco, Pro Se  
203 Cardinal Drive  
Summerville, South Carolina 29485  
843-804-0875  
Email to: [janetfrisco@yahoo.com](mailto:janetfrisco@yahoo.com)

**CERTIFICATE OF SERVICE**

The foregoing document *Defendant's Answers to Plaintiff's Requests to Admit* was served on the following by email and U.S.Mail with sufficient postage affixed, this 7<sup>th</sup> day of July, 2021:

Stephan V. Futeral,  
1004 Anna Knapp Blvd., 2<sup>nd</sup> Floor  
Mount Pleasant, South Carolina 29464  
[sfuteral@charlestonlaw.net](mailto:sfuteral@charlestonlaw.net)

  
Janet L. Frisco, Pro Se

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CLERK OF COURT

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

PET HELPERS, INC.,

Plaintiff,

vs.

JANET FRISCO,

Defendant.

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-10-2682

**AFFIDAVIT OF MELISSA SUSKO IN  
SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT**

PERSONALLY, appeared before me, Melissa Susko, who after being duly sworn, deposes and states as follows:

1. I am providing this Affidavit in support of Plaintiff's Motion for Summary Judgment which was filed on June 16, 2021.

2. The Defendant voluntarily surrendered the dog, "Toby/Slim Jim" to Pet Helpers on April 13, 2021 because she had "seven other dogs" and did not "have the time to give him attention or train." I have attached the "Dog Surrender Form" which was completed by Defendant when she surrendered "Toby/Slim Jim" to Pet Helpers (**Exhibit A**).

3. The Defendant has repeatedly alleged that "Toby/Slim Jim" was killed by Pet Helpers and that Pet Helpers staged the adoption of "Toby/Slim Jim" by allowing Blaine John, an employee of Pet Helpers to adopt the dog. Defendant's allegations are blatantly false as "Toby/Slim Jim" was not killed by Pet Helpers nor was the dog was not adopted by an employee of Pet Helpers.

4. On May 8, 2021, "Toby/Slim Jim" was adopted by a 3<sup>rd</sup> party. The adopter of "Toby/Slim Jim" was an ideal candidate to become "Toby/Slim Jim's" owner.

5. The Defendant was a far less than ideal candidate to adopt "Toby/Slim Jim" or any other pet due to her already having seven other dogs and admittedly did not have time to give

“Toby/Slim Jim” the attention that a pet deserves. In fact, on April 30, 2021, the Defendant sent an email to Pet Helpers seeking to surrender another one of her dogs to Pet Helpers. (Exhibit B)

Melissa Susko  
Melissa Susko  
Executive Director of Pet Helpers, Inc.

SWORN to and subscribed before me  
this 8<sup>th</sup> day of April, 2022.

Shauna Shackleton  
Notary Public for South Carolina  
My commission expires: 02/18/2030

NOTARY SEAL





# Pet Helpers Dog Surrender Form

"Slim Jim" 

Owner Name: JANET FRISCO D.L. Number: 004853415 Phone Number: 843 804-0075

Address: 203 CARDINAL DRIVE City/State/Zip: SUMMERVILLE, SC 29485

Dog's Name: Toby "Tob" Age: 1 yr Gender (circle): Female  Male

Breed: Deer Hound Color/Markings: Tricolor Spayed/Neutered? (Circle)  Yes  No

How long have you had the dog? 6-8 months

Where did you adopt/purchase/find the dog? running loose on Century Aluminum

Property with three other hunting dogs

Please give us as much information as possible about the dog and feel free to elaborate on particular habits/issues as this information helps us find their perfect new home.

Has the dog lived with other dogs? How do they get along with other dog friends?

He lived with me in my home and I have seven other dogs. He gets along with other dogs but I separate him when he eats or has a toy.

Has the dog lived with cats? Interacted with cats? Does they have a prey drive (with squirrels etc.)?

No, I have an outside cat but he doesn't come in contact with her.

Has the dog interacted with or lived with children? What ages? Would they feel comfortable living in a home with children under ten years old?

No children in the household but I think he would be good with them generally speaking

Where does the dog live primarily? Indoor/Outdoor/Both?

Inside in a cage but goes outside frequently in a yard with a privacy fence

Is the dog housebroken or crate trained?

not completely, won't go in his cage

Is the dog trained to walk on a leash? Do they have any reactivity when they're on the leash?

yes He's good now.

Do they have any anxiety? (Ex. separation, storm/firework, etc.) Do they bark when left alone? Have they ever jumped a fence or been an escape artist?

No he's never tried to escape. He barks occasionally when he wants to come in

Have they ever chewed on items in the home other than toys? (Ex. Furniture, shoes) If so please explain.

No he loves rawhide free chewys & chews though.

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How does the dog react to new stimulations outside of the home? Are they nervous when meeting new people or animals?

Good, he's friendly with strangers

Does the dog like affection? Are there any places they don't like to be touched? (Ex. face, paws, tail, etc.)

Yes, he's okay with petting & baths

Is there any type of aggression we should know about? How are they with food and toys?

Not really except once I put another dog in his cage with a toy and he snapped at him

What is the dog's typical/daily schedule? Are they fed on a particular schedule?

He eats about 5:30 AM & again at about 8:00 PM 4 cups, goes outside in the back yard & stays in his cage a good bit

Please provide a description of their personality. What type of home do you think would be best for them?

His friendly and docile and responds when you call him by name or say "cage" he goes in it. He'd adapt well to any situation. He likes kennels.

Please explain your reasons for surrendering this dog.

I have seven other dogs at this time. I don't have the time to give him attention or train.

Has the dog every bitten anyone or attacked an animal? (Circle) Yes/No

If yes, please explain the incident:

N/A

If the dog is being surrendered for behavioral reasons please describe the behaviors in detail here:

N/A

Please describe in detail what you have done to try and correct any unwanted behaviors (ex. Exercise, dog trainer, clicker training, shock collar, etc.)

He hasn't needed any because he's a good dog. He jumped up on the door & I placed stuff there so he wouldn't do it

Does the dog have a regular veterinarian? (Circle) Yes/No If yes, did you bring their records? (Circle) Yes/No

If no, please provide the veterinarian/clinic information below so we may retrieve the records.

DR PATRICK

Is the dog currently on monthly flea and heartworm prevention? (Circle) Yes/No

I give him Ivermectin from the feed store that's made for pigs according to his weight. He had it for April.

Are there any other medications that they require for their health?

**\*THERE IS A SURRENDER FEE TO PLACE ANIMALS IN THIS SHELTER\***

**OWNER SURRENDER**

**(Owned or stray found more than 1 month ago)**

**FULLY VETTED**

**(Vaccinated, HW Negative, and spayed/neutered)**

**\$100.00**

**FULLY VETTED, HEARTWORM POSITIVE**

**(Vaccinated, spayed/neutered, positive for heartworms)**

**\$200.00**

**NOT FULLY VETTED and HEARTWORM NEGATIVE**

**(No vaccines, not tested, not spayed or neutered)**

**Must be tested for HW before admittance:**

**If HW negative: \$200**

How will you be paying to help offset the cost of the care of this animal? (Circle)

Cash

Check

Debit/Credit (AE / V / MC only)

I hereby state that the above animal(s) have not bitten anyone in the last 10 days. I authorize my veterinarian to release any and all medical information on said animal(s). I understand that I am willingly releasing this animal to Pet Helpers Adoption Center and Spay/Neuter Clinic and relinquish all ownership of said animal(s).

Signature

Janet Frisco

Date

4/13/21

wd: Trixie

messages

Intake pethelpers <intake@pethelpers.org>  
From: Melissa Susko <msusko@pethelpers.org>

Wed, May 12, 2021 at 4:04 AM

She sent this as well. This is also the thread where she wanted me to take another dog from her.

----- Forwarded message -----  
From: Janet Frisco <janetfrisco@yahoo.com>  
Date: Tue, May 11, 2021 at 10:25 PM  
Subject: Re: Trixie  
To: intake pethelpers <intake@pethelpers.org>

I'm keeping her safe with me and after what has happened to Toby, I would never surrender another animal to Pet Helpers. You better hope you can get him back from that guy you handed him over to for 25 bucks who was probably a hunter. I cannot believe this kind of callousness. The heartache and suffering you caused me and God only knows what Toby is going through so your adoption stats would look good. I was practically begging you to give him back to me. I pray to God nothing has happened to him and I get him back immediately. What a fool I was even giving you \$100 when the dog was already neutered, chipped and vaccinated.

Sent from Yahoo Mail on Android

On Sat, May 1, 2021 at 8:08 AM, intake pethelpers <intake@pethelpers.org> wrote:

Hello  
We are packed full at this time and cannot intake for several weeks.  
I'd say reach out in early June to see if things have improved.

Thank you  
Katie

On Fri, Apr 30, 2021 at 4:51 PM Janet Frisco <janetfrisco@yahoo.com> wrote:  
I have a young small female Beagle I rescued and need to surrender. She's fearful and has anxiety in many situations. She's not spayed or vaccinated.

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

PET HELPERS, INC.,

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Defendant.

IN THE COURT OF COMMON PLEAS

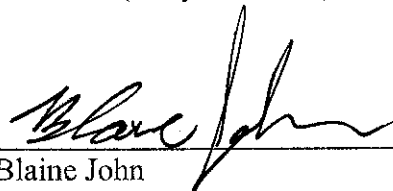
NINTH JUDICIAL CIRCUIT

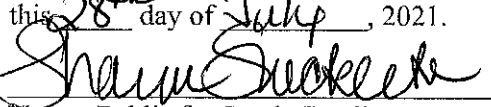
CASE NO.: 2021-CP-10-2682

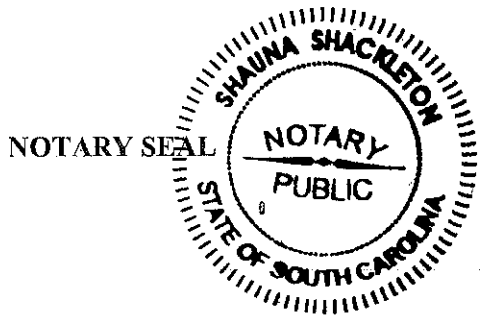
**AFFIDAVIT OF BLAINE JOHN**

PERSONALLY, appeared before me, Blaine John, who after being duly sworn, deposes and states as follows:

I am an employee at Pet Helpers, Inc. It is my understanding that the Defendant in this matter alleges that I adopted the canine (Toby/Slim Jim) which Defendant relinquished to Pet Helpers, Inc. on April 13, 2021. I did not adopt the canine (Toby/Slim Jim) as alleged by the Defendant.

  
Blaine John

SWORN to and subscribed before me  
this 28<sup>th</sup> day of July, 2021.  
  
Notary Public for South Carolina  
My commission expires: 02/18/2030



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**wd: Trixie**

messages

Wed, May 12, 2021 at 4:04 AM

**Intake pethelpers** <intake@pethelpers.org>  
to: Melissa Susko <msusko@pethelpers.org>

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To: intake pethelpers <intake@pethelpers.org>

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On Sat, May 1, 2021 at 8:08 AM, intake pethelpers <intake@pethelpers.org> wrote:

Hello  
We are packed full at this time and cannot intake for several weeks.  
I'd say reach out in early June to see if things have improved.

Thank you  
Katie

On Fri, Apr 30, 2021 at 4:51 PM Janet Frisco <janetfrisco@yahoo.com> wrote:  
I have a young small female Beagle I rescued and need to surrender. She's fearful and has anxiety in many situations. She's not spayed or vaccinated.