

STATE OF SOUTH CAROLINA

COUNTY OF HAMPTON

RENEE S. BEACH, PHILLIP BEACH,  
ROBIN BEACH, SAVANNAH TUTEN,  
AND SETH TUTEN,

Plaintiffs,

v.

GREGORY M. PARKER, GREGORY  
M. PARKER, INC. d/b/a PARKER'S  
CORPORATION, BLAKE GRECO,  
JASON D'CRUZ, VICKY WARD,  
MAX FRATODDI, HENRY ROSADO,  
AND PRIVATE INVESTIGATION  
SERVICES GROUP, LLC,

Defendants.

IN THE COURT OF COMMON PLEAS  
FOURTEENTH JUDICIAL CIRCUIT

C/A No. 2021-CP-25-00392

**NOTICE OF RESPONSE TO THE  
COURT'S ORDER OF MAY 24, 2023  
ON BEHALF OF GREGORY M.  
PARKER, GREGORY M. PARKER, INC,  
d/b/a PARKER'S CORPORATION,  
BLAKE GRECO AND JASON D'CRUZ**

Defendants Gregory M. Parker, Gregory M. Parker, Inc., d/b/a Parker's Corporation, Blake Greco, and Jason D'Cruz (collectively, "**Parker's Defendants**"), respectfully file this pleading informing the Court as to how they intend to respond to the Court's Order of May 24, 2023 and notifying Plaintiffs of their position regarding any response by Plaintiffs.

Plaintiffs' counsel has indicated in an unprompted e-mail to the Court that he intends to file a motion asking the Court to reconsider its Order finding that Plaintiffs' counsel is in possession of a number of documents that the Court has correctly found to be privileged. The Parker's Defendants also intend to file a Motion asking the Court to reconsider its ruling in part as to certain groups of documents that the Court did not address and requesting that the Court specifically rule these documents currently possessed by Plaintiffs' counsel are also privileged.

The Parker's Defendants respectfully notify the Court that they intend to file their submission to the Court *ex parte*, and *in camera*, to continue to protect their privilege—and we intend to do that by submitting our filing to the Court in Chambers via e-mail with a highly redacted

copy provided to counsel for all other parties. Because the Order is public, the Parker's Defendants can file that same highly redacted version of their Motion on the public docket and intend to do so unless the Court directs that filing a redacted copy is unnecessary at this stage. The Parker's Defendants believe that any filing by Plaintiff's counsel must be submitted directly to the Court and/or filed under seal with copies restricted to the Court and to the Parker's Defendants only.<sup>1</sup>

As for Plaintiffs' counsel, given the Court's Order finding that many of the documents possessed by Plaintiff are privileged, the Parker's Defendants respectfully request the Court immediately order Plaintiffs' counsel to return all Laurens Group and Inquiry Agency, LLC documents to the Parker's Defendants. Simply put, Plaintiffs' counsel's possession of all these documents continues to be improper—and Plaintiffs and their counsel should not have access to the same in filing any Motion to Reconsider. The Parker's Defendants also submit that given the above and other pleadings filed in this matter, any Motion filed by Plaintiff's counsel must be filed under seal, with access limited to the Court and to the Parker's Defendants only so as to protect the privileged information.

Respectfully submitted,

s/ Mark C. Moore

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<sup>1</sup> Obviously, if the Court requires the Plaintiffs (or any other party) to file documents under seal, the filing party must follow the requirements of Rule 41.1 of the South Carolina Rules of Civil Procedure by filing a simultaneous motion to seal—and the Parker's Defendants agree that the conditions outlined in Rule 41.1 are present here and will not oppose any Motion to Seal.

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BLAKE GRECO

May 31, 2023  
Columbia, South Carolina