

FILED

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

2008 MAY 12 PM 3:23

IN THE FAMILY COURT OF THE
NINTH JUDICIAL CIRCUIT
CASE NO.: 08-DR-10-1801

JENNIFER BUTLER MURRAY,
Plaintiff,

JULIE J. ARMSTRONG
CLERK OF COURT

Vs.

WILLIAM MURRAY,
Defendant.

BY [Signature]

SUMMONS

TO: THE DEFENDANT ABOVE NAMED: WILLIAM MURRAY

YOU ARE HEREBY SUMMONED and required to answer the complaint in this action,
a copy of which is herewith served upon you, and to serve a copy of your answer to this
complaint upon the subscriber, at the address shown below, within thirty (30) days after the
service hereof, exclusive of the day of such service.

YOU ARE HEREBY GIVEN NOTICE FURTHER that if you fail to appear and defend
and fail to answer the complaint as required by this summons within thirty (30) days after the
service hereof, judgment by default will be rendered against you for the relief demanded in the
complaint.

ROSEN LAW FIRM, LLC

By: [Signature]

Robert N. Rosen
18 Broad Street, Suite 201
Charleston, SC 29401
(843) 377-1700

rnrosen@rosen-lawfirm.com
ATTORNEYS FOR PLAINTIFF

Charleston, South Carolina
May __, 2008

*Plan
5/12/08*

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE FAMILY COURT OF THE)
NINTH JUDICIAL CIRCUIT)
CASE NO.: 08-DR-10-1801)

JENNIFER BUTLER MURRAY,)
Plaintiff,)

FILED)
2008 MAY 12 PM 3:24)
JULIE J. ARMSTRONG)
CLERK OF COURT)

Vs.)

COMPLAINT)

WILLIAM JAMES MURRAY,)
Defendant.)

The Plaintiff above named, complaining of the Defendant herein, alleges and states as follows:

1. The Plaintiff and the parties' minor children are and have been residents of Charleston County, State of South Carolina, for more than six (6) months prior to the commencement of this action.

2. The parties hereto are husband and wife, having been married on July 4, 1997 in Cook County, Illinois.

3. Throughout the marriage, Plaintiff has been a good, faithful and loving wife and mother.

4. In 2006, the Plaintiff moved to Sullivan's Island with the parties' four (4) minor children due to Defendant's adultery, addiction to marijuana and alcohol, abusive behavior, physical abuse, sexual addictions, and frequent abandonment. Defendant would often leave the state or country without telling Plaintiff. Defendant left for extended periods of time without speaking to the Plaintiff or his children. Often Plaintiff is unaware of the Defendant's whereabouts. On information and belief, Defendant travels overseas where he engages in public and private altercations and sexual liaisons.

5. Defendant has physically abused the Plaintiff on more than one (1) occasion during the marriage. The latest altercation occurred in November, 2007 at Sullivan's Island when the Defendant hit her in the face and then told her she was "lucky he didn't kill her." Defendant's violent, abusive and erratic behavior toward Plaintiff has destroyed the marital relationship between the parties and Plaintiff no longer feels safe being in the presence of Defendant.

6. Defendant has repeatedly threatened Plaintiff and has left threatening voice messages on the home telephone which the minor children have heard.

7. Plaintiff is informed and believes that she is entitled to a divorce, a *vinculo matrimonii*, of and from the Defendant on the grounds of adultery, physical cruelty, habitual addition to drugs, and one year separation.

8. The Plaintiff is informed and believes that she is entitled to an Order granting her sole custody of the parties' minor children, Caleb James Murray (born January 11, 1993), Jackson William Murray (born October 6, 1995), Cooper Jones Murray (born January 27, 1997), and Lincoln Darius Murray (born May 30, 2001), pendente lite and permanently, and granting Defendant, reasonable visitation, pendente lite and permanently, so long as he conducts himself in a proper manner, obeys all restraining orders, and does not involve the minor children in this litigation.

9. During the time the parties lived together as husband and wife, the Plaintiff conducted herself in a manner becoming a good, true, devoted and faithful wife, maintaining a good home for her husband and four children. The Plaintiff has always been the primary caretaker of the parties' minor children.

10. The Plaintiff is informed and believes that she is entitled to an Order awarding her child support from the Defendant, pendente lite and permanently, and in addition that Defendant be solely responsible for any and all costs and expenses associated with the children including, but not limited to, nanny care, clothes, extra-curricular expenses, allowances, private school tuition, fees and costs, clothes, extra-curricular expenses, and the like, retroactively from March 1, 2008, *pendente lite* and permanently.

11. Plaintiff alleges that she is entitled to an Order requiring Defendant to provide Plaintiff with all telephone numbers and addresses where the Defendant and/or the children can be reached during the times he exercises his visitation, *pendente lite* and permanently.

12. Plaintiff alleges that she is entitled to an order restraining and enjoining Defendant from exposing the minor children at any time to any person with whom he is sexually or romantically involved, any of his paramours or anyone taking, distributing, or in possession of illegal drugs, *pendente lite* and permanently.

13. The Plaintiff is informed and believes that she is entitled to an Ex-Parte Order, a Temporary Order and a Final Order restraining and enjoining Defendant from interfering with, abusing, intimidating, threatening, threatening to abuse or molesting the Plaintiff, stalking the Plaintiff, or making abusive or threatening telephone calls or text messages to her or the children, pendente lite and permanently.

14. The Plaintiff is further informed and believes that she is entitled to an Order restraining and enjoining Defendant from entering or attempting to enter the marital home at 1414 Thompson Avenue, or interfering with her vehicles in her possession, pendente lite and permanently.

15. The Plaintiff is concerned that Defendant will involve the minor children in this litigation and that Defendant will denigrate the Plaintiff. Upon information and belief, the Plaintiff is entitled to an Order restraining and enjoining the Defendant from denigrating Plaintiff, embroiling the children in this litigation, from discussing this litigation with the children, or within earshot of the children, from alienating the children's affection from his mother, from disparaging and criticizing the Plaintiff to the children, in the presence of the children, or within earshot of the children, pendente lite and permanently.

16. Defendant is a wealthy actor, the star of such major motion pictures as "Ghostbusters," "Stripes," "Caddyshack," and "Groundhog Day". Plaintiff is a mother of four (4) and is dependent upon the Defendant to support herself and the minor children.

17. The parties entered into an Antenuptial Agreement which is attached hereto as Exhibit A. The Plaintiff asks this court to declare the rights of parties under this Agreement, determine if it is valid under South Carolina law, and if it is not, grant Plaintiff permanent, periodic alimony, attorney's fees, life insurance to insure same, an equitable apportionment of the marital estate, and other relief. If it is valid, Plaintiff seeks enforcement of the Agreement.

18. Defendant contends the Pre-nuptial Agreement is valid yet he has breached said agreement by failing to honor Article Nine (9) of said Agreement which requires him to support the Plaintiff in the style to which she was accustomed during the marriage.

19. Upon information and belief, the Plaintiff is entitled to an order granting her the exclusive use and possession of the home where her and the children reside located at 1414 Thompson Avenue, Sullivan's Island, South Carolina as well as the personal property located at the home and in her possession, pendente lite and permanently. Plaintiff has always been the primary caretaker of the minor children. Plaintiff and the minor children should not be required to leave the home. Plaintiff alleges that, due to the Defendant's physical abuse of the Plaintiff, his abandonment, his emotional instability, his refusal to seek treatment for same, and his adultery, Defendant should be restrained and enjoined from returning to the home on Sullivan's Island, *pendente lite*.

20. Plaintiff is informed and believes that she is entitled to an Order requiring Defendant to continue to provide the same health, medical and dental health insurance coverage, including counseling, for Plaintiff and the minor children as he has in the past year, and that he timely pay any and all premiums regarding same as well as any uncovered expenses. In the event Defendant

cancelled any of the policies, Defendant should be required to obtain insurance coverage which shall be the same, or better, than it was prior to the separation, *pendente lite* and permanently.

21. Plaintiff is informed and believes that she is entitled to an Order awarding exclusive ownership as well as use and possession of the vehicles in her possession, pendente lite and permanently.

22. Upon information and belief, Plaintiff is entitled to an Order awarding her use and possession of all of her non-marital property, pendente lite and permanently.

23. The Plaintiff is informed and believes that she is entitled to an Order allowing full and complete discovery pursuant to the South Carolina Rules of Civil Procedure and Family Court Rule 25.

24. The Plaintiff is informed and believes that she is entitled to an Order requiring Defendant to file a Financial Declaration with the Family Court within 45 days after the Complaint is served pursuant to the South Carolina Family Court Rule 20(b).

25. Plaintiff is without sufficient funds to pay her attorneys, accountants, expert witnesses, and costs of this litigation. Plaintiff alleges that she is entitled to an order requiring Defendant to pay Plaintiff attorney's fees, costs, expert's fees, investigator's fees and costs of this litigation, *pendente lite* and permanently.

WHEREFORE, the Plaintiff prays for an Order as follows:

1. Granting the Plaintiff a divorce, a vinculo matrimonii, of and from the Defendant, on the grounds of physical cruelty, habitual use of drugs, adultery and/or one year separation;
2. Granting the Plaintiff sole custody of the parties' minor children, and granting Defendant reasonable visitation, pendente lite and permanently; as set forth herein;
3. Granting the Plaintiff child support from the Defendant, pendente lite and permanently, as set forth herein;
4. Declaring the rights of the parties under the Antenuptial Agreement, determining if said agreement is valid and if not, granting Plaintiff permanent, periodic alimony, life insurance to insure same, equitable apportionment of the marital estate, attorney's fees and other relief. If the Agreement is valid, Plaintiff seeks enforcement of same and especially enforcement of Article Nine (9) relative to her temporary support.
5. Granting the Plaintiff the exclusive use and possession of the home located at 1414 Thompson Avenue, Sullivan's Island, South Carolina, as well as the personal property located at the home and in her possession, pendente lite;
6. Granting the Plaintiff the exclusive use and possession of the vehicles currently in

her possession, pendente lite;

7. Granting the Plaintiff use and possession of all of her non-marital property, pendente lite and permanently;

8. Requiring the Defendant to provide comprehensive health and medical insurance for the Plaintiff and the minor children, substantially similar to the current policy and to pay the cost of health and medical care that is not covered by insurance, pendente lite and permanently;

9. Restraining and enjoining the Defendant from interfering with, abusing, intimidating, threatening to abuse or molesting the Plaintiff, pendente lite and permanently;

10. Restraining and enjoining the Defendant from entering or attempting to enter the home at 1414 Thompson Avenue, pendente lite and permanently;

11. Restraining and enjoining the Defendant from denigrating Plaintiff, embroiling the children in this litigation, from discussing this litigation with the children, or within earshot of the children, from alienating the children's affection from his mother, from disparaging and criticizing the Plaintiff to the children, in the presence of the children, or within earshot of the children, pendente lite and permanently;

12. Requiring the Defendant to file a Financial Declaration pursuant to South Carolina Family Court Rule 20(b);

13. Granting the Plaintiff full and complete discovery pursuant to the South Carolina Rules of Civil Procedure and Family Court Rule 25;

14. Granting the Plaintiff attorneys' fees and costs as well as experts' fees and costs for this action, pendente lite and permanently;

15. Granting such other and further relief as well the Court deems just and proper.

ROSEN LAW FIRM, LLC

By: 

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RNRosen@rosen-lawfirm.com

ATTORNEY FOR PLAINTIFF

Charleston, South Carolina

May 12, 2008

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

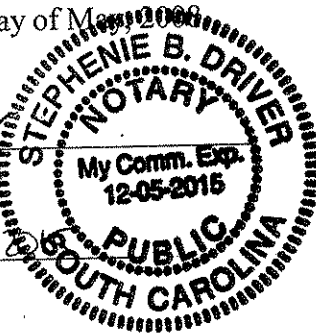
VERIFICATION

PERSONALLY appeared before me, Jennifer Butler Murray, who, being first duly sworn, deposes and says: that she is the Plaintiff in the within action, that she has read the foregoing Complaint and all matters alleged therein are true to the best of her knowledge, save and except those matters alleged on information and belief, and, as to those, she believes them to be true.

By: Jennifer Butler Murray

SWORN to before me this 12th day of May, 2008

Stephen B. Driver
Notary Public for South Carolina



My Commission Expires: 12-5-2015