

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

Katie Godwin, as Personal Representative
of the Estate of Farrah Burdette Godwin
Turner, Deceased,

Plaintiff,

vs.

Frederick Hopkins; Cheryl Hopkins; Seth
Hopkins; David Suggs; the Suggs Family
Revocable Trust; & Cheryl Hopkins and
David Suggs as Trustees of the Suggs
Family Revocable Trust,

Defendants.

IN THE COURT OF COMMON PLEAS FOR
THE 12th JUDICIAL CIRCUIT

Case No.: 2021-CP-21-

SUMMONS

YOU ARE HEREBY SUMMONED AND REQUIRED to answer the Complaint in the above-entitled action, a copy of which is served upon you, and to serve a copy of your Answer upon the attorney at their office located at 50 Folly Road, South Carolina 29407 within thirty (30) days after the date of such service, exclusive of the day of service; and if you fail to answer the Complaint within that time, judgment by default will be rendered against you for the relief demanded in the Complaint.

CRANTFORD MEEHAN

s/Jerry A. Meehan, Jr.
Jerry A. Meehan, Jr.
William Crantford
50 Folly Road
Charleston, SC 29407
T: 843-376-4030
F: 843-900-6141
ATTORNEYS FOR PLAINTIFF

September 21, 2021

STATE OF SOUTH CAROLINA

COUNTY OF FLORENCE

Katie Godwin, as Personal Representative
of the Estate of Farrah Burdette Godwin
Turner, Deceased,

Plaintiff,

vs.

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Hopkins; David Suggs; the Suggs Family
Revocable Trust; & Cheryl Hopkins and
David Suggs as Trustees of the Suggs
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IN THE COURT OF COMMON PLEAS FOR
THE 12th JUDICIAL CIRCUIT

Case No.: 2021-CP-21-

Complaint
(Jury Trial Requested)

YOU ARE HEREBY SUMMONED AND REQUIRED to answer the Complaint in the above-entitled action, a copy of which is:

1. Plaintiff, The Estate of Farrah Burdette Godwin Turner (“Estate of Farrah Turner”) is an open estate in the Probate Court of Florence County, South Carolina.
2. Upon information and belief, the Defendant Frederick Hopkins is a citizen and resident of the Florence County, South Carolina.
3. Upon information and belief, the Defendant Cheryl Hopkins is a citizen and resident of the Florence County, South Carolina.
4. Upon information and belief, the Defendant Seth Hopkins is a citizen and resident of the Florence County, South Carolina.
5. Upon information and belief, the Defendant David Suggs is a citizen and resident of the Florence County, South Carolina.
6. The Suggs Family Revocable Trust was established and maintains property in Florence County, in particular at, 932 Ashton Drive, Florence, South Carolina, the situs of the incident referred to herein.
7. The acts and omission giving rise to the Complaint occurred in Florence County, South Carolina.

8. On October 3, 2018, Farrah Turner drove to the home of Frederick Hopkins in Florence, South Carolina, in her official capacity as a Florence County Sheriff.
9. Farrah Turner and other officers drove to Frederick Hopkins' home to investigate alleged criminal sexual conduct by Frederick Hopkins' son, Seth Hopkins, with other officers.
10. When officers arrived at Frederick Hopkins' home, Frederick Hopkins' opened fire on Farrah Turner and other officers from his home.
11. Frederick Hopkins and police officers exchanged gun fire for two hours.
12. Frederick Hopkins fatally shot two officers, including Farrah Turner.
13. Upon information and belief, police apprehended Frederick Hopkins and charged him with two counts of murder and five counts of attempted murder.
14. Upon information and belief, Cheryl Hopkins knew that the weapons used in the shooting were kept in the home.
15. Upon information and belief, Cheryl Hopkins knew Frederick Hopkins suffered from post-traumatic stress syndrome and kept weapons in the house despite that knowledge.
16. Upon information and belief, Seth Hopkins entered a guilty plea to a charge of second-degree criminal sexual conduct with a minor and was sentenced to twenty years in prison.
17. As a result of the shooting, Farrah Turner suffered the following injuries and damages:
 - a. Extensive pain, mental anguish, suffering and discomfort;
 - b. Disability for a period of time;
 - c. Death;
 - d. Emotional trauma and distress;
 - e. Loss of enjoyment of life; and,
 - f. Other damages that will be shown at trial.

**FOR A FIRST CAUSE OF ACTION
(Wrongful Death, Negligence and Gross Negligence as to Defendant Seth Hopkins)**

18. Plaintiff repeats and realleges paragraphs 1-17, above, herein as if verbatim.
19. Upon information and belief Defendant Seth Hopkins sexually assaulted minor children.
20. Florence County Sheriff's Office attempted an investigation of said sexual assault against minor children.
21. Seth Hopkins knew his actions would cause police to visit the home of Frederick Hopkins.

22. Seth Hopkins knew or should have known Frederick Hopkins would react violently if law enforcement presented to his home.
23. In an effort to protect Seth Hopkins from criminal prosecution for his sexual assault against minor children, Defendant Frederick Hopkins fired upon law enforcement, namely Farrah Turner.
24. Defendant Seth Hopkins owed a duty to not sexually assault minor children and to prevent Defendant Frederick Hopkins encountering a situation in which he would become violent.
25. The injuries and damages incurred by the Plaintiff were directly and proximately caused by the Defendant Seth Hopkins's careless, negligent, grossly negligent, willful, wanton, reckless, and unlawful acts in one or more of the following particulars:
 - a. Sexually assaulting minor children;
 - b. Asking Defendant Frederick Hopkins for protection from law enforcement investigations;
 - c. Causing law enforcement to arrive at the residence of Frederick Hopkins;
 - d. Permitting Frederick Hopkins to fire upon police in his protection;
 - e. Knowing firearms were present in the house and failing to advise police of their presence and the dangerous propensities of Frederick Hopkins;
 - f. Failing to stop Frederick Hopkins from firing upon law enforcement; and
 - g. Such other particulars as may be evidenced at trial.
26. The Defendant's careless, negligent, willful, wanton, reckless and unlawful acts were a direct and proximate cause of the incident described herein and resulting injuries and damages to the Plaintiff.
27. The Plaintiff is informed and believes that they are entitled to judgment against the Defendant Seth Hopkins for actual and punitive damages in an appropriate amount.

FOR A SECOND CAUSE OF ACTION

(Wrongful Death, Negligence and Gross Negligence as to Defendant Cheryl Hopkins)

28. Plaintiff repeats and realleges paragraphs 1-27, above, herein as if verbatim.
29. Upon information and belief, Defendant Cheryl Hopkins was an owner of multiple firearms.
30. Upon information and belief, Defendant, Defendant Cheryl Hopkins kept multiple firearms in her home, but did not keep them secure.

31. Upon information and belief, Defendant, Defendant Cheryl Hopkins knew her guns were unsecured.
32. Cheryl Hopkins knew her husband, Defendant Frederick Hopkins, had violent tendencies.
33. Cheryl Hopkins knew her husband, Defendant Frederick Hopkins had assaulted a Florence County worker for photographing an alleged city ordinance violation in 2013.
34. Cheryl Hopkins knew her husband, Defendant Frederick Hopkins, had threatened one of their children with gun violence.
35. Cheryl Hopkins knew her husband, Defendant Frederick Hopkins, suffered from post-traumatic stress syndrome.
36. Cheryl Hopkins failed to secure the guns in her home. Knowing firearms were present in the house, failed to advise law enforcement of their presence and the dangerous propensities of Frederick Hopkins.
37. Defendant Cheryl Hopkins owed a duty to the public, including the Plaintiff, to keep the firearms in her home secure and unavailable to those with violent tendencies and other mental ailments causing violent actions.
38. The injuries and damages incurred by the Plaintiff were directly and proximately caused by the Defendant Cheryl Hopkin's careless, negligent, grossly negligent, willful, wanton, reckless, and unlawful acts in one or more of the following particulars:
 - a. In keeping firearms in her home;
 - b. In keeping unsecured firearms in her home;
 - c. In failing to secure the firearms in her home;
 - d. In keeping unsecured firearms in the home when another resident of the home, namely Frederick Hopkins, suffered from mental disorders;
 - e. In keeping unsecured firearms in the home when another resident of the home, namely Frederick Hopkins, exhibited violent tendencies;
 - f. In permitting her son Seth Hopkins to sexually assault minor children;
 - g. In failing to prevent Frederick Hopkins from firing upon and shooting law enforcement officers, including the Plaintiff;
 - h. In knowing firearms were present in the house and failing to advise law enforcement of their presence and the dangerous propensities of Frederick Hopkins;and

- i. Such other particulars as may be evidenced at trial.
39. The Defendant Cheryl Hopkins careless, negligent, willful, wanton, reckless and unlawful acts were a direct and proximate cause of the injuries and damages to the Plaintiff.
40. The Plaintiff is informed and believes she is entitled to judgment against the Defendant for actual and punitive damages in appropriate amount.

**FOR A THIRD CAUSE OF ACTION
(Wrongful Death, Negligence and Gross Negligence as to Defendant Cheryl Hopkins, David Suggs, and Cheryl Hopkins and David R. Suggs as Trustees of the Suggs Family Revocable Trust)**

41. Plaintiff repeats and realleges paragraphs 1-40 above, herein as if verbatim.
42. Upon information and belief, Defendants Cheryl Hopkins and David Suggs (“Trustee Defendants”) controlled the trust that owned the home where the above referenced actions and omissions occurred.
43. Upon information and belief, the Trustee Defendants permitted Frederick Hopkins to keep multiple firearms in the home but did not require he keep them secure.
44. Upon information and belief, the Trustee Defendants knew the guns were unsecured.
45. The Trustee Defendants had a history of allowing the firearms in the home to be taken by unauthorized users, including children.
46. The Trustee Defendants knew Defendant Frederick Hopkins had violent tendencies.
47. The Trustee Defendants knew Defendant Frederick Hopkins had assaulted a Florence County worker for photographing an alleged city ordinance violation in 2013.
48. The Trustee Defendants knew Defendant Frederick Hopkins had threatened one of their children with gun violence.
49. The Trustee Defendants knew Defendant Frederick Hopkins suffered from post-traumatic stress syndrome.
50. The Trustee Defendants failed to secure the guns in the home. Knowing firearms were present in the house, they failed to advise law enforcement of the guns’ presence and the dangerous propensities of Frederick Hopkins.
51. The Trustee Defendants owed a duty to the public, including the Plaintiffs, to keep the firearms in the home secure and unavailable to those with violent tendencies and other mental ailments causing violent actions.

52. The injuries and damages incurred by the Plaintiff were directly and proximately caused by the Trustee Defendants' careless, negligent, grossly negligent, willful, wanton, reckless, and unlawful acts in one or more of the following particulars:
- a. In keeping firearms in the home;
 - b. In keeping unsecured firearms in the home;
 - c. In failing to secure the firearms in the home;
 - d. In keeping unsecured firearms in the home when another resident of the home, namely Frederick Hopkins, suffered from mental disorders;
 - e. In keeping unsecured firearms in the home when another resident of the home, namely Frederick Hopkins, exhibited violent tendencies;
 - f. In permitting Seth Hopkins to sexually assault minor children;
 - g. In failing to prevent Frederick Hopkins from firing upon and shooting law enforcement officers, including the Plaintiff;
 - h. In knowing firearms were present in the house and failing to advise law enforcement of their presence and the dangerous propensities of Frederick Hopkins; and
 - i. Such other particulars as may be evidenced at trial.
53. The Trustee Defendants' careless, negligent, willful, wanton, reckless and unlawful acts were a direct and proximate cause of the injuries and damages to the Plaintiff.
54. The Plaintiff is informed and believes she is entitled to judgment against these Defendants for actual and punitive damages in an appropriate amount.

**FOR A FORTH CAUSE OF ACTION
(Assault and Battery as to Defendant Frederick Hopkins)**

55. Plaintiff repeats and realleges paragraphs 1-54 herein as if verbatim:
56. Defendant Frederick Hopkins owned multiple firearms.
57. Defendant Frederick Hopkins intentionally and recklessly fired upon Florence County Sheriff's officers, including the Plaintiff.
58. Defendant Frederick Hopkins intentionally shot the Plaintiff.
59. Defendant Frederick Hopkins intended to apply force, a bullet, to the Plaintiff.
60. Defendant Frederick Hopkins intended to batter the Plaintiff.
61. Defendant Frederick Hopkins attempted to and threatened physical harm to the Plaintiff.

62. Plaintiff experienced a reasonable apprehension of bodily harm as a result of the threats and actions by Defendant Frederick Hopkins.

63. The damages suffered by the Plaintiff were a direct result of the actions of Defendant Frederick Hopkins, namely the threatening of force, the shooting a firearm at the Plaintiff, and the hitting Plaintiff with a bullet.

64. The Defendant's intentional, careless, negligent, willful, wanton, reckless and unlawful acts were a direct and proximate cause of the injuries and damages to the Plaintiff.

65. The Plaintiff is informed and believes that she is entitled to judgment against the Defendant for actual and punitive damages in an appropriate amount.

WHEREFORE, the Plaintiff prays for judgment against the Defendants for actual and punitive damages in an appropriate amount to be determined at trial, the costs of this action, and for such other and further relief as the Court may deem just and proper.

CRANTFORD MEEHAN

s/Jerry A. Meehan Jr.

Jerry A. Meehan, Jr.

SC Bar No. 102077

William Crantford

SC Bar No. 101706

50 Folly Road

Charleston, SC 29407

T: 843-376-4030

F: 843-900-6141

ATTORNEYS FOR PLAINTIFF

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