

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

KATHRYN DENNIS,

Plaintiff,

vs.

THOMAS RAVENEL,

Defendant.

THOMAS RAVENEL,

Third Party Plaintiff,

vs.

HAYMAKER MEDIA, INC. and BRAVO  
MEDIA PRODUCTIONS, LLC,

Third Party Defendants.

IN THE FAMILY COURT  
NINTH JUDICIAL CIRCUIT

2019 JAN -8 PM 12:18

JULY 10 2019  
CLEAR OF COURT

BY

VERIFIED AMENDED ANSWER,  
COUNTERCLAIM AND THIRD  
PARTY COMPLAINT



Docket No.: 2018-DR-10-3671

The Defendant, THOMAS RAVENEL, amending his answer and counterclaim to Plaintiff's Complaint, objects to Plaintiff's Complaint on grounds that it fails to comply with Rule 8(a), Rule 8(e), Rule 10(b), and Rule 11 of the South Carolina Rules of Civil Procedure. Upon information and belief, Defendant ("Father") avers that Plaintiff ("Mother") has filed her Complaint in bad faith, for the purpose of garnering media attention, creating material for her storyline on Southern Charm, and ensuring her marketability as a "reality TV star". Without waiving said objection, and in light of the difficulties posed to Defendant as a result of Plaintiff's gross disregard and failure to comply with aforementioned Rules of Civil Procedure, Defendant, to the best of his ability, respectfully alleges and shows unto the Court as follows:

**FOR A FIRST DEFENSE**  
**BY WAY OF ANSWER TO PLAINTIFF'S COMPLAINT**

1. Defendant denies each and every allegation contained in Plaintiff's Complaint unless expressly admitted, explained, or qualified herein, and Defendant demands strict proof thereof.



2. Defendant admits the allegations of Paragraphs 1, 2, 3, 4, and 5 of the Plaintiff's Complaint.



3. Answering Paragraph 6 of the Plaintiff's Complaint, Defendant admits that the Plaintiff has passed all tests requested of her by Defendant. Defendant qualifies said admission and avers that Plaintiff has purchased synthetic urine for purposes passing court-ordered drug tests in the past; Defendant therefore cannot conclude that the Plaintiff's "passed tests" evidence that Plaintiff has been drug-free. Defendant denies Plaintiff's averment that she has successfully attended a rehabilitation program and demands strict proof thereof. Upon information and belief, Plaintiff failed to attend the majority of her classes and group lessons at rehab and left the rehabilitation center despite being advised that she should extend her stay. Defendant denies the remainder of Paragraph 6 of Plaintiff's Complaint and demands strict proof thereof.



4. Defendant admits Paragraph 7 of the Plaintiff's Complaint with qualification. Defendant is informed and believes that Plaintiff has misconstrued the conclusions of Dr. Waid's report by failing to include his additional findings, including but not limited to:

- a. "Ms. Dennis has a well documented history for involvement in psychiatric/psychological intervention including use of medications";

- b. "Ms. Dennis needs to remain mindful of her psychiatric difficulties which appear to be responding well to her compliance with intervention including use of a regimen of medications"; and
- c. "It is evident that therapy also assisted Ms. Dennis as she is achieving maturation and engaging in other activities that serve her well."

Defendant is informed and believes that Dr. Waid's findings indicate that Plaintiff is capable of being a fit parent so long as she is properly medicated and receives appropriate therapy. Defendant demands strict proof thereof. Defendant further avers that the psychological parental fitness evaluation conducted by Dr. Waid on the Defendant found, *inter alia*, that "Mr. Ravenel is assessed as being a fit and competent parent for his children, having genuine love and care for them, wanting what is in their best welfare."

5. Defendant admits Sentences 1 and 2 of Paragraph 8 but denies Sentence 3 to the extent that it alleges Plaintiff is entitled to bring a modification action on a *de novo* basis. Defendant shall show that a *de novo* review of a modification action is barred on grounds of *res judicata*.

6. Answering Paragraph 9 of the Plaintiff's Complaint, Defendant admits that Plaintiff is 29 years younger than Defendant. Defendant denies the remainder of this Paragraph and demands strict proof thereof. Defendant avers that Plaintiff is not more capable of caring for the minor children than Defendant. Upon information and belief, the minor children have developmentally regressed since Plaintiff has assumed 50/50 time with the children, as evidence by, *inter alia*, Plaintiff's failure to help potty train the parties' youngest child and continuing to feed the youngest by bottle instead of a cup.



7. Answering Paragraph 10 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof. Defendant avers that he has only one "nanny" under his employment and that he is a well-involved, competent and capable hands-on father. Defendant further avers that Plaintiff has engaged in the very behavior of which Plaintiff now accuses Defendant. Plaintiff travels extensively, has forfeited visitation time with the minor children to do so, and habitually leaves the minor children with their maternal grandmother so Plaintiff can party and socialize when the minor children are in her care.

8. Defendant objects to Plaintiff's averments in Paragraph 11 of Plaintiff's Complaint on grounds of *res judicata*. Said averments concern matters and alleged events which occurred prior to the entry of the Final Order and which were fully litigated in the parties' initial custody action. Defendant further objects to Paragraph 11 on grounds that Paragraph 11 does not comply with Rule 8(a), Rule 8(e), and Rule 10(b) of the South Carolina Rules of Civil Procedure. Without waiving said objections, Defendant responds as follows:

a. As to Sentence 1 of Paragraph 11 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof. Defendant avers that he does not suffer from a personality disorder and has never been diagnosed with one. Upon information and belief, Plaintiff has been diagnosed with multiple mental health conditions, including but not limited to Bi-Polar Disorder, Obsessive Compulsive Disorder, Attention Deficit Disorder, kleptomania, self-mutilation, and Cluster B Personality Traits, including histrionic and borderline personality disorders. Defendant denies any and all allegations of sexual assault and avers that Plaintiff has admitted to Defendant that Plaintiff gives no credence to the allegations made against him;



b. Defendant admits the allegations of Sentence 2 of Paragraph 11 of the Plaintiff's Complaint;

c. As to Sentence 3 of Paragraph 11 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof;

d. As to Sentence 4 of Paragraph 11 of the Plaintiff's Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of this averment;

e. As to Sentence 5 of Paragraph 11 of the Plaintiff's Complaint, Defendant denies apologizing for a sexual assault because Defendant did not commit a sexual assault;

f. As to Sentence 6 and Sentence 7 of Paragraph 11 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof;

g. As to Sentence 8 of Paragraph 11 of the Plaintiff's Complaint, Defendant admits that his contract with Southern Charm as not been renewed. Defendant believes that

his involvement in the entertainment and reality TV industry has negatively impacted his life, is not in the minor children's best interests, and has no present intention of returning to Southern Charm or the reality TV industry in general. As to the remainder of Sentence 8 of Paragraph 11 of the Plaintiff's Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of this averment.

9. Answering Paragraph 12 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof.

10. Answering Paragraph 13 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof.

11. Answering Paragraph 14 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof.

12. Answering Paragraph 15 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof. Defendant avers that he has neither defamed nor encouraged others to defame Plaintiff. Any and all defamatory comments made by Miss Jacobs regarding the Plaintiff were directly provoked and/or orchestrated by the Plaintiff and the producers of Southern Charm to elicit a dramatic response commensurate with Southern Charm's storyline and Miss Jacob's role as a "villain". Furthermore, Plaintiff has engaged in similar defamatory behavior towards Miss Jacobs and has unclean hands in asserting Miss Jacob's alleged defamatory comments as an injury and cause of action. Defendant expresses serious concern at Plaintiff's attempt to classify the staged scenarios filmed for Southern Charm as "real-life" events justifying the Family Court's intervention. Upon information and belief, Plaintiff has filed this action, not for the best interests of the minor children, but in furtherance of her role in Southern Charm as "the rehabilitated mother who regains custody of her children." Upon information and belief, Plaintiff has done so with the express and/or implied encouragement and/or condonation of the producers of Southern Charm.

13. Answering Paragraph 16 of the Plaintiff's Complaint, Defendant admits that Miss Jacobs has posted videos of her interaction with the children on social media. Defendant denies the remainder of this Paragraph and demands strict proof thereof.

14. Answering Paragraph 17 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof. Defendant avers that Plaintiff's grievances with Miss Jacobs do not arise from concern for the parties' minor children, but from Plaintiff's pathological enmity towards any female with whom Defendant has or has had a romantic relationship. The requested

relief as it pertains to Miss Jacobs is unnecessary and in no way related to the minor children's best interests. The minor children and Miss Jacobs have a loving, healthy relationship and to restrain Miss Jacobs from contact with the minor children would cause them undue injury. In regard to Plaintiff's request that Defendant be restrained from allowing any third party from making social media posts of the minor children, Defendant is amenable to this restraint so long as said restraint is mutual among the parties.

15. Answering Paragraph 18 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof. To Defendant's information and belief, Defendant has made no untrue posts on social media about Plaintiff. Defendant reiterates his concern at Plaintiff's continued reference to alleged matters, events, and scenarios which occurred during the filming of Southern Charm. Defendant avers that these scenarios are fabricated and/or contrived, for the express purpose of creating dramatic and licentious material for television, and that to invoke such scenes as grounds for judicial intervention and justification for judicial relief is a gross abuse of process.

16. Answering Paragraph 19 of the Plaintiff's Complaint, Defendant responds as follows:

- a. As to Sentence 1 of Paragraph 19 of Plaintiff's Complaint, Defendant denies the same to the extent Plaintiff insinuates that Defendant's "influence" was the cause of Plaintiff's drug and alcohol problems. Defendant shall show that Plaintiff's struggle with drugs and alcohol predates Defendant's relationship with Plaintiff;
- b. As to Sentence 2 of Paragraph 19 of the Plaintiff's Complaint, Defendant is informed and believes that Plaintiff did not successfully complete her rehabilitation program, as Plaintiff tested positive for drugs after her release. Defendant cannot



be certain that Plaintiff has maintained and sustained sobriety since the entry of the 2017 Final Order simply because Plaintiff has passed the requested drug tests since that time, as Plaintiff has a history of purchasing synthetic urine for purposes of passing drug tests;


c. Defendant admits the allegations of Sentence 3 of Paragraph 19 of the Plaintiff's Complaint. Defendant avers that he has no substance abuse disorder necessitating his admission to a rehabilitation center and has never been Court ordered to admit himself to one;

d. Defendant admits the allegations of Sentence 4 and Sentence 5 of Paragraph 19 of the Plaintiff's Complaint; and


e. Defendant denies the allegations of Sentence 6 of Paragraph 19 of Plaintiff's Complaint and repeats his objections to Plaintiff's invocation of Defendant's alleged "sexual assault" as reason Plaintiff should be awarded custody. Plaintiff did not "discover" the "sexual assault" claim. These matters were fully litigated in the parties' prior custody action and are barred from re-litigation on grounds of *res*

*judicata*.  
17. Answering Paragraph 20 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof. Defendant avers that he has not delegated the minor children's health care their nanny but has appropriately delegated their health care to the children's therapists and physicians. Upon information and belief, Plaintiff, not Defendant, has and continues to neglect the health and wellbeing of the minor children. Defendant shall show that Plaintiff has failed on numerous occasions to take the minor children to their scheduled therapy, physical, and dental


appointments, and is routinely late dropping the children off at daycare and kindergarten during the time Plaintiff has had physical custody of the minor children.

 18. Answering Paragraph 21 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof.

19. Answering Paragraph 22 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof. Defendant notes to the Court that it is Plaintiff, not Defendant, who is required to pay child support under the terms of the 2017 Final Order. Furthermore, upon information and belief, Plaintiff has not paid Defendant child support since June of 2018, in violation of the terms of the 2017 Final Order.

 20. To the extent Paragraph 23 of the Plaintiff's Complaint calls for a denial or admission by Defendant, Defendant denies any and all allegations of Paragraph 23. Defendant is informed and believes that the restraints imposed by the 2017 Final Order sufficiently protect the safety and welfare of the minor children, with the addition of those restraints requested in Defendant's Counterclaim below.

21. To the extent Paragraph 24 of the Plaintiff's Complaint calls for an answer by Defendant, Defendant denies any and all allegations of Paragraph 24. Plaintiff lacks foundation or legitimate grounds for the relief requested in Paragraph 24 of Plaintiff's Complaint and Defendant demands strict proof thereof. Upon information and belief, Plaintiff seeks such relief for the purpose of harassing Defendant.

 22. Defendant objects to Paragraph 25 of Plaintiff's Complaint on grounds that Paragraph 15 does not comply with Rule 8(a), Rule 8(3), and Rule 10(b) of the South Carolina Rules of Civil Procedure. Without waiving said objections, Defendant responds as follows:



a. As to Sentence 1 of Paragraph 25 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof;

b. As to Sentence 2 of Paragraph 25 of Plaintiff's Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of this averment;



c. As to Sentence 3 of Paragraph 25 of Plaintiff's Complaint, Defendant cannot recall making this statement to Plaintiff but may have done so out of frustration at Plaintiff's inability to co-parent;

d. Defendant admits Sentence 4 of Paragraph 25 of Plaintiff's Complaint; and



e. To the extent Sentences 5, 6, and 7 call for an answer by Defendant, Defendant denies the same and demands strict proof thereof.

23. Answering Paragraph 26 of the Plaintiff's Complaint, Defendant denies the same and demands strict proof thereof.

**FOR A SECOND DEFENSE AND BY WAY OF COUNTERCLAIM**  
**(Background and Jurisdiction)**

24. Defendant incorporates, repeats and reiterates into his Counterclaim each defense, allegation, and admission contained within Paragraphs 1 through 23 above as if restated verbatim herein.



25. Plaintiff (Mother) is a citizen and resident of the County of Charleston, State of South Carolina.

26. Defendant (Father) is a citizen and resident of the County of Berkeley, State of South Carolina.

27. The parties are the natural parents of two minor children, namely: K.C.R. (born 2014) and S.J.R. (born 2015).





28. The parties entered into a Complete Custody Agreement that was approved by this Court and made a Final Order on June 30, 2017, in Case No. 2016-DR-10-1687 (herein “Agreement”).

29. Based upon the foregoing, Father believes this Court maintains jurisdiction over the parties and the issues raised in this action, and that venue for this action properly lies in the County of Charleston, State of South Carolina.

30. Father is informed and believes that Mother’s suit for a change in custody was not brought out of concern for the best interests of the minor children.

31. Mother initiated this litigation on or around the time filming of the next season of Southern Charm began.

32. Father is informed and believes that Mother has filed this action for the sole and/or primary purpose of securing her role on the reality TV show “Southern Charm” and progressing her storyline as the “rehabilitated Mother who regains possession of her minor children.”

33. Father is informed and believes that Mother has initiated this suit with the encouragement, condonation, and/or express or implied permission of the producers of Southern Charm for the purpose of providing dramatic material for the next season of Southern Charm.

34. Mother initiated this litigation on or around the time that Father was charged with the alleged assault of the parties’ former nanny, Dawn Ledwell, in January of 2015.

35. The date of the alleged assault occurred prior to the entry of this Court’s Order approving the parties’ Agreement.

36. The allegations of assault against Ms. Ledwell were fully litigated in the parties’ prior custody action. Requests to Admit were issued. Ms. Ledwell was interviewed by counsel of the parties and the Guardian *ad Litem*.



37. Father denied all allegations of assault against Ms. Ledwell in Father's response to Mother's Requests to Admit. Father repeats and affirms his denial of any assault.

38. Father is informed and believes that any statements made by Ms. Ledwell in her interviews regarding inappropriate conduct by Father were found neither credible nor concerning, as evidenced, *inter alia*, by Father's award of custody of the minor children.



39. Father is informed and believes that Mother condoned and/or encouraged Ms. Ledwell to make false allegations of sexual assault and to file a criminal complaint against him, on the heels of the "Me Too" movement, for purposes of helping Mother gain sole custody of the parties' minor children in a subsequent modification action.



40. Father is informed and believes, for those reasons set forth herein, that Mother's Complaint is frivolous and was made in bad faith.

41. Father is informed and believes, as evidenced by the averments herein, that Mother does not want full custody of the minor children and could not handle the responsibilities of being a full custodial parent if she was awarded such.

**FOR A THIRD DEFENSE AND BY WAY OF COUNTERCLAIM**  
**(Child Custody and Visitation)**



42. All allegations of the previous paragraphs are re-alleged.

43. Father has custody of the parties' minor children pursuant to the terms of the parties' Agreement.

44. Due to Mother's drug and alcohol problems, Mother agreed to a 12-month phased-in visitation plan whereby Mother's physical time with the minor children increased as Plaintiff successfully passed drug and alcohol tests.

45. Mother currently has physical custody of the minor children every other week.



46. Father has been the primary caretaker and legal custodian of the minor children since being awarded primary custody of the minor children at the June 27, 2016 Temporary Hearing in the parties' former custody action (Case No. 2016-DR-10-1687).



47. The minor children are closely bonded with Father.

48. Father is a fit parent.

49. Father has time available to spend with and care for the minor children.

50. Father is attentive to the needs of the minor children.

51. When Father is working, Father has an appropriate and experienced caretaker who sees to the needs of the minor children.



52. Father maintains a stable environment for the minor children.

53. Father maintains a safe and secure environment for the minor children in which the minor children are appropriately supervised.

54. Since the June 27, 2016 Temporary Hearing, Father has been responsible for the decision-making related to the safety, health and wellness of the minor children.

55. The parties' oldest child, K.C.R., has developmental and behavioral problems that have required intensive therapy. Father is informed and believes these problems are the result of Plaintiff Mother's lack of bonding with K.C.R. during infancy.

56. The parties' youngest child, S.J.R., has developmental and behavioral problems that have required intensive therapy. Father is informed and believes that these problems are the result of Mother's drug and alcohol consumption while S.J.R. was in utero.

57. Since Father was awarded custody of the parties' minor children, the minor children have received regular, individualized therapy tailored to their developmental needs.



58. Since Father was awarded custody of the parties' minor children, the minor children have developmentally and behaviorally progressed under his care.

59. As Mother's physical time with the minor children increased under the Agreement's phased-in visitation plan, Father has observed marked regression in the minor children's therapeutic progress.

60. Father is informed and believes that Mother has engaged in a course of conduct which has brought Mother's child centered judgment into question and causes Father to believe that Mother is not capable of making mature and appropriate decisions in furtherance of the best interests of the minor children.

61. Father is informed and believes that Mother has engaged in a lifestyle which causes Father to believe that Mother is not capable of behaving in a manner necessary to advance and protect the minor children's welfare, best interests, and safety.

62. Father is informed and believes that Mother has engaged in a pattern of behavior reflecting a character unsuitable for the moral and spiritual upbringing of the parties' minor children.

63. Mother is a cast member of the reality TV show, Southern Charm.

64. Father is informed and believes that Mother values fame, celebrity, and the life of TV stardom above the needs and wellbeing of the parties' minor children.

65. Father is informed and believes that Mother has admitted that her morals conflict with the needs of "the network" and of Southern Charm.

66. Father is informed and believes that Mother has admitted that the children do not deserve to be punished because she allows herself to be on Southern Charm.



67. Father is informed and believes that Mother abuses prescription drugs, is engaged in the use of illegal drugs, and consumes alcohol in combination thereof regularly.

68. Father is informed and believes that Mother buys, sells, and trades prescription medications to and from friends, cast members, and show producers to support her prescription drug habit.

69. Father is informed and believes that the Mother has been intoxicated by the abuse of prescription drugs and/or use of illegal drugs while in sole care and control of the parties' minor children.

70. Father is informed and believes that Mother suffers from severe mental health disorders and drug addictions that impede her ability to properly care and provide for the parties' minor children.

71. Father is informed and believes that Mother becomes overwhelmed after having sole care of the minor children for more than a few days, causing Mother to further engage in illegal drug use and/or prescription drug abuse as a coping mechanism for anxiety and stress.

72. Father is informed and believes that Mother is unable to keep and maintain a schedule, is frequently late to appointments, and habitually sleeps past noon.

73. Mother has failed on numerous occasions to take the children to their scheduled doctor's and/or therapy appointments while the children are in Mother's physical care.

74. Mother has failed on numerous occasions to take the children to their scheduled doctor's and/or therapy appointments on time while the children are in Mother's physical care.

75. Mother has regularly failed to take the minor children to daycare and/or kindergarten, at all or on time, during days the minor children are in Mother's physical care.

76. Father is informed and believes that Mother has engaged in a pattern of disparagement against Father to, in the presence of, and within earshot of the minor children.

77. Father is informed and believes the Mother's disparagement of Father in front of and within earshot of the minor children has undermined Father's relationships with the minor children and risks their total destruction.

78. Father is informed and believes that on or about October 29, 2018, Mother committed a hit and run

79. Father is informed and believes that Mother's failure to immediately inform the injured party as to the damage she inflicted on the party's vehicle reflects a gross lack of character and integrity, causing Father concern as to Mother's ability to be a moral example and role model for the minor children.

80. Father is informed and believes that Mother's complicity in the criminal charges and false allegations made against him further reflect Mother's lack of character, integrity, and general human decency, and Mother's willingness to let such injustice occur to the father of her children causes Father great concern as to Mother's ability to operate in the children's best interests.

81. It is in the best interests of the minor children for this Court to enter a final order which finds and declares Father shall maintain sole custody of the parties' minor children as set forth in *South Carolina Code* § 63-15-210 (2) (1976, as amended)

82. It is in the best interests of the minor children for this Court to enter a final order which designates Father as the parent with sole authority to make decisions related to the children's health, medical and dental care, education, extracurricular activities, religious training, body modification, and substantial changes to cosmetic appearance.



83. It is in the best interests of the minor children for this Court to enter a final order which provides a detailed schedule of visitation by Mother with the minor children on a regular basis and during holidays, with appropriate restraints imposed against Mother from consuming alcohol, abusing prescription drugs, and using illegal drugs while caring for the children.

**FOR A FOURTH DEFENSE AND BY WAY OF COUNTERCLAIM**  
**(Child Support and Insurance)**

84. All allegations of the previous paragraphs are re-alleged.

85. Each party has a legal and moral obligation to financially support the minor children.

86. Mother is capable of contributing financial support for the minor children.

87. Upon consideration of all relevant facts and law, Father is entitled to an order of this Court requiring Mother to pay child support to Father for the benefit of the minor children.

88. Father maintains health insurance for the benefit of the minor children.

89. Father is informed and believes that he is entitled to an order of this Court requiring Mother, as an incident of and as part of child support, to pay for a part of the necessary uninsured health-related, therapeutic, and dental expenses incurred by or on behalf of the minor children.

**FOR A FIFTH DEFENSE AND BY WAY OF COUNTERCLAIM**  
**(Restraints)**

90. All allegations of the previous paragraphs are re-alleged.

91. Father is informed and believes that Mother's obsession with fame, stardom and public exposure is injurious to the health, safety, and welfare of the minor children.

92. Father requests that this Court issue a restraint prohibiting the minor children from being filmed or featured on Southern Charm or any other television show, *pendente lite* and permanently.

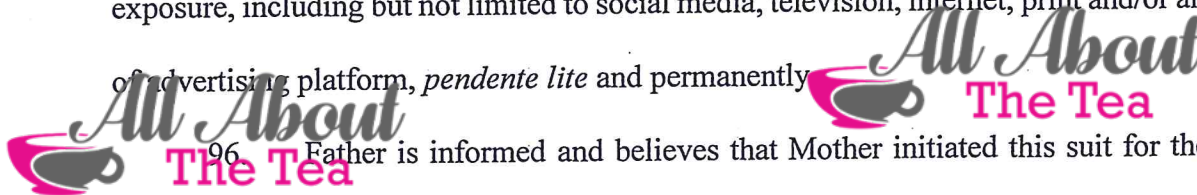


93. Father is informed and believes that Mother exploits the minor children for financial gain through various ventures, including but not limited to endorsements of children's products on Mother's Instagram and Snapchat accounts.

94. Father is informed and believes that using the minor children to gain endorsement deals and procure income conflicts with the development of a healthy parent-child relationship and is against the best interest of the minor children.



95. Father requests that this Court issue a restraint prohibiting Mother from using the minor children to secure or facilitate endorsements and income through any kind of public exposure, including but not limited to social media, television, internet, print and/or any other kind of advertising platform, *pendente lite* and permanently.



96. Father is informed and believes that Mother initiated this suit for the purpose of using it as material for the upcoming season of Southern Charm and that such purpose is an affront and gross abuse of the South Carolina judicial system.

97. Father is informed and believes that Mother's uninhibited discussion of the parties' custody litigation on an internationally aired television show is against the welfare and best interests of the minor children.



98. Father requests that this Court issue a restraint prohibiting Mother from discussing this litigation on Southern Charm, television, any and all social media platforms, and/or to the press, *pendente lite* and permanently.

99. Father requests that this Court issue a restraint prohibiting Mother from consuming alcohol, abusing prescription drugs, and using illegal drugs while caring for the children, *pendente lite* and permanently.



100. Father requests that this Court issue a restraint prohibiting Mother from making disparaging remarks about Father to the minor children, in the presence of the minor children, or within earshot of the minor children, or allowing or encouraging others to do the same, *pendente lite* and permanently



101. Father requests that this Court issue a restraint prohibiting Mother from discussing this litigation or the parties' prior custody litigation to the minor children, in the presence of the minor children, or within earshot of the minor children, or allowing or encouraging others to do the same, *pendente lite* and permanently



**FOR A SIXTH DEFENSE AND BY WAY OF COUNTERCLAIM**

**(Attorneys' Fees and Costs)**

102. All allegations of the previous paragraphs are re-alleged.

103. Father is informed and believes that Mother's suit for a change in custody is frivolous and was made in bad faith.

104. Mother's pursuit of a change in custody has led directly to his need to retain legal counsel.



105. Father is informed and believes that Mother should be required to pay all of Father's attorneys' fees and costs in this matter, *pendente lite* and permanently.



**WHEREFORE**, the Father hereby moves the Court for an Order:

A. Denying all relief requested by Mother in Mother's Complaint, including Plaintiff's request for a change in custody, *pendente lite* and permanently;

B. Awarding Father sole custody of the minor children, *pendente lite* and permanently;

C. Requiring Mother to pay an appropriate amount of child support to Father, *pendente lite* and permanently;

D. Issuing the following restraints:





a. Prohibiting the minor children from being filmed or featured on Southern Charm or any other television show, *pendente lite* and permanently;

b. Prohibiting Mother from using the minor children to secure or facilitate endorsements and income through any kind of public exposure, including but not limited to social media, television, internet, print publications and/or any other kind of advertising platform, *pendente lite* and permanently;



c. Prohibiting Mother from discussing this litigation on Southern Charm, television, any and all social media platforms, and/or to the press, *pendente lite* and permanently;



d. Prohibiting Mother from consuming alcohol, abusing prescription drugs, and using illegal drugs while caring for the children, *pendente lite* and permanently;




e. Prohibiting Mother from making disparaging remarks about Father to the minor children, in the presence of the minor children, or within earshot of the minor children, nor allowing or encouraging others to do the same, *pendente lite* and permanently; and


f. Prohibiting Mother from discussing this litigation or the parties' current litigation to the minor children, in the presence of the minor children, or within earshot of the minor children, or allowing or encouraging others to do the same, *pendente lite* and permanently.


E. Awarding attorney's fees and costs to Father for the defense of this matter, *pendente lite* and permanently; and

F. For such other further relief as this Court deems just and proper.


**THIRD PARTY COMPLAINT**

 The Defendant, THOMAS RAVENEL, in accordance with Rule 14(a) of the South Carolina Rules of Civil Procedure and Rule 2(a) of the South Carolina Rules of Family Court, by way of Third Party Complaint against Third Party Defendants, Haymaker Media, Inc. and Bravo Media Productions, LLC, states, upon information and belief:


 Third Party Plaintiff incorporates by reference all responses to the paragraphs of the Complaint and all allegations set forth in the Counterclaim as though set forth at length herein.

2. Haymaker Media, Inc. and Bravo Media Productions, LLC are production companies incorporated in the State of New York responsible for the filming and production of the reality television show, Southern Charm 

3. Haymaker Media and Bravo Media Production transact business in the State of South Carolina, contract to supply services in the State of South Carolina, and have entered into contracts to be performed in whole or in part in the State of South Carolina through their respective association with Southern Charm, the filming of which is based predominantly in Charleston, South Carolina. As such, this Court has personal jurisdiction over the Third Party Defendants pursuant to S.C. Code Ann. § 36-2-803 (2016), and venue is proper in the County of Charleston.

 This Court has subject matter jurisdiction over this action as it relates to the Third Party Plaintiff's claims against the Third Party Defendants, pursuant to S.C. Code Ann. § 63-3-530 (19) (2013).

**FOR A FIRST CAUSE OF ACTION  
INJUNCTION & RESTRAINTS**

 5. The Third Party Plaintiff is informed and believes that the Third Party Defendants, Haymaker Media, Inc. and/or Bravo Media Productions, LLC, encouraged, condoned and/or gave

Plaintiff express or implied consent to initiate a lawsuit against the Third Party Plaintiff for custody of Plaintiff's and Third Party Plaintiff's minor children;

6. The Third Party Plaintiff is informed and believes that the Plaintiff filed and was encouraged to file this lawsuit for the express or implied purpose of providing material for the filming of Season 6 of Southern Charm.

7. The Third Party Plaintiff is informed and believes that the Third Party Defendants initiated filming of Season 6 of Southern Charm on or around the time the Plaintiff filed this action for custody against the Third Party Plaintiff.

8. The Third Party Plaintiff is informed and believes that the Third Party Defendants have unaired footage of the minor children and/or the Plaintiff discussing this litigation, which Third Party Defendants intend to air and use in upcoming episodes of Season 6 of Southern Charm.

9. To preserve the integrity of the Family Court and protect the best interests of the minor children, the Third Party Plaintiff requests that this Court enjoin the Third Party Defendants from disseminating and/or airing any Season 6 and/or otherwise unaired video footage which features the minor children in this matter and/or which directly or indirectly concerns the minor children, this litigation, and/or the ongoing custody dispute between the Plaintiff and the Third Party Plaintiff, *pendente lite* and permanently.

10. For the reasons so stated above, the Third Party Plaintiff further requests that this Court restrain the Third Party Defendants from filming the minor children in this matter, and/or disseminating, producing and/or airing any footage on Southern Charm or any other television show that concerns and/or discusses this litigation, the ongoing custody dispute between the Plaintiff and Third Party Plaintiff, and their minor children, *pendente lite* and permanently.



11. The Third Party Plaintiff is informed and believes that the Third Party Defendants' involvement in the initiation of the Plaintiff's litigation against the Third Party Plaintiff has led directly to his need to retain legal counsel and that the Third Party Defendants should be required to pay all of the Third Party Plaintiff's attorneys' fees and costs in this matter, *pendente lite* and permanently.

WHEREFORE, the Third Party Plaintiff hereby moves the Court for an Order:

- A. Enjoining the Third Party Defendants from disseminating and/or airing any Season 6 and/or otherwise unaired video footage which features the minor children in this matter and/or which directly or indirectly concerns the minor children, this litigation, and/or the ongoing custody dispute between the Plaintiff and the Third Party Plaintiff, *pendente lite* and permanently;
- B. Restraining the Third Party Defendants from filming the minor children, and/or disseminating, producing and/or airing any footage on Southern Charm or any other television show that concerns and/or discusses this litigation, the ongoing custody dispute between the Plaintiff and Third Party Plaintiff, and their minor children, *pendente lite* and permanently; and
- C. Awarding attorney's fees and costs to Third Party Plaintiff, *pendente lite* and permanently.

(signature page to follow)

Respectfully submitted,

ANDREWS-MEDIATION AND LAW FIRM, PA



  
KELLEY DUPRE ANDREWS-EDWARDS  
F.P. SEGARS-ANDREWS

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Mt. Pleasant, South Carolina  
Dated: January 4, 2019

■

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

**KATHRYN DENNIS,**

Plaintiff,

vs.

**THOMAS RAVENEL,**

Defendant.

**THOMAS RAVENEL,**

Third Party Plaintiff,

vs.

**HAYMAKER MEDIA, INC. and BRAVO  
MEDIA PRODUCTIONS, LLC,**

Third Party Defendants.

IN THE FAMILY COURT  
NINTH JUDICIAL CIRCUIT

2019 JAN -4 PM 12:19

JULIE A. ALLEN  
CLERK OF COURT

BY \_\_\_\_\_

**VERIFICATION**

Docket No.: 2018-DR-10-3671

PERSONALLY appeared before me, Thomas Ravenel, who, being first duly sworn, deposes and says that he is the Defendant and Third Party Plaintiff regarding the within action; that he has read the foregoing *Amended Answer, Counterclaim and Third Party Complaint* and that all matters alleged therein are true to the best of his knowledge, save and except those matters alleged on information and belief, and, as to those, he believes them to be true.

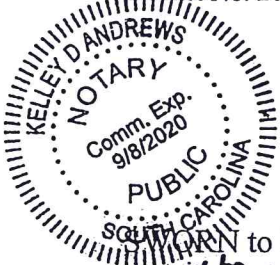
(signature page to follow)



Defendant's Verification to Amended Answer  
Counterclaim and Third Party Complaint  
Docket No. 2018-DR-10-3671



  
Thomas Ravenel



Subscribed and sworn to before me  
this 4th day of January 2019

  
Kelley D. Andrews  
Notary Public for South Carolina  
My Commission Expires: 9-8-2020

