

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF AIKEN	)	
Shannon Eckel And Hat Trick Sporthorses, Inc	)	
	)	
PLAINTIFFS	)	
	)	
VERSUS	)	SUMMONS
	)	
Lizzie Thomas, Kelsey Sasser, Meredith	)	
Cook Stokes, Kai Hernandez, Mary Catherine	)	
Brislin, Laura Bryant, Florida Animal Advocates	)	
Viridian Hill Farm LLC, Jessica Stringer,	)	
Sydney Motley, Despina Pakidis and Ranch	)	
of Hidden Gems	)	
	)	
DEFENDANTS	)	
	)	

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TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber at his office at PO Box 7215 Aiken, SC 29804 or by hand to 702 Chaffee Lane, Aiken, SC, 29801 within thirty (30) days after the service hereof, exclusive of the date of service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff will apply to the Court for the relief requested to include judgment by default.

LAW OFFICES OF JOHN W. HARTE, LLC

S/John W. Harte  
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March 12, 2025

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STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF AIKEN	)	
Shannon Eckel And Hat Trick Sporthorses, Inc	)	
	)	
PLAINTIFFS	)	
	)	
VERSUS	)	COMPLAINT
	)	
Lizzie Thomas, Kelsey Sasser, Meredith	)	
Cook Stokes, Kai Hernandez, Mary Catherine	)	(Jury Trial Demanded)
Brislin, Laura Bryant, Florida Animal Advocates	)	
Viridian Hill Farm LLC, Jessica Stringer,	)	
Sydney Motley, Despina Pakidis and Ranch	)	
of Hidden Gems	)	
	)	
DEFENDANTS	)	
	)	

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Plaintiffs, complaining of the Defendants, respectfully allege.

#### PARTIES

1. The Plaintiff Hat Trick Stables, Inc. is a corporation formed under the laws of South Carolina with a principal place of business in Aiken County, South Carolina.
2. The Plaintiff Shannon Eckel is a resident of Aiken County, South Carolina, and is the president and operating officer of Hat Trick Stables, Inc.
3. The Defendants are individuals who have posted defamatory claims against the Plaintiffs on Facebook.
4. The Defendants are identified as follows:
  - a. Lizzie Thomas is a resident of the State of South Carolina.
  - b. Kelsey Sasser is a resident of the State of South Carolina.
  - c. Meredith Cook Stokes is a resident of the State of Georgia

- d. Kai Hernandez is a resident of the State of Washington
- e. Mary Catherine Brislin is a resident of the State of South Carolina
- f. Laura Bryant is a resident of the State of Georgia
- g. Florida Animal Advocates is an organization with offices in the State of Florida
- h. Viridian Hill Farm LLC is an entity with offices in the State of Mississippi.
- i. Jessica Stringer is a resident of the State of Mississippi
- j. Sydney Motley is a resident of the State of North Carolina
- k. Ranch of Hidden Gems is an entity located in South Carolina.
- l. Despina Pakidis is a resident of South Carolina

#### JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this action as this is a civil case within the court's general jurisdiction.

6. This Court has personal jurisdiction over the Defendants because the Defendants have committed a tortious act in whole or in part in this State by publishing defamatory statements on Facebook with the knowledge and intent that they would be seen in Aiken County, South Carolina.

7. This Court is the proper venue for this case because the Plaintiffs reside in Aiken County, and the defamatory statements were published with the intent to cause injury to the Plaintiffs in Aiken County, South Carolina.

#### STATEMENT OF FACTS

8. Plaintiffs Hat Trick Stables, Inc. and Shannon Eckel operate a business in Aiken County, South Carolina.

9. Each of the Defendants has posted claims on Facebook alleging that the Plaintiffs murdered a horse and alleging other wrongful acts.

8 These allegations are false and have been made by the Defendants without any investigation of the facts or knowledge whatsoever about the event which is the subject of the posts.

10. The Defendants published these defamatory posts on Facebook with the knowledge and intent that they would be seen in Aiken County, South Carolina.

11. The Defendants and each of them intended to damage and injure the Plaintiffs, their reputation and their ability to work in the equine industry.

12. The Defendants combined their attacks on the Plaintiffs to maximize the injury and damage and to create the appearance that, because of their diverse locations they cannot be held accountable.

13. Each of the Defendants intended to cause Shannon Eckel to suffer mental and emotional distress. And they intended to hold Shannon Eckel up to ridicule in the community where she lives and in the larger equine community.

14. As a result of these defamatory posts and comments, the Plaintiffs have suffered monetary losses.

15. Plaintiff Shannon Eckel has experienced great mental distress due to these false allegations.

16. The false and defamatory stories and allegations were published with the intent that the lies would be seen in Aiken, South Carolina and would injure the Plaintiffs in Aiken County, South Carolina.

17. The Defendants entered into a conspiracy by their conduct and acted in furtherance of the common design and purpose to destroy the Plaintiff's business and to injure the plaintiffs. Each of the Defendants is liable for the acts of the other Defendants and they are liable for the others who were engaged in the joint attack even if those coconspirators and not named as Defendants. The act of one conspirator is the act of all, and each conspirator is responsible for such acts. A conspiracy can be formed when two or more persons combine or agree to do something to the detriment of another, whether the act itself is unlawful or the means of doing it are unlawful.

18. The acts and declarations of any conspirator made during the pendency of the conspiracy, and in furtherance thereof, are deemed acts and declarations of every other conspirator. Therefore, informal coordination and mutual understanding to defame someone establishes a conspiracy, making each participant liable for the defamatory acts committed by others in the group even if some members of the group are not named as Defendants.

FIRST CAUSE OF ACTION  
Defamation  
(against all Defendants)

19. Plaintiffs repeat and reallege the allegations set forth in paragraphs 1 through 13 as if fully set forth herein.

20. Defendants made false and defamatory statements concerning the Plaintiffs, including, but not limited to the following:

- a. Shannon Eckel murdered a horse.

- b. Shannon Eckel tortured a horse.
- c. Shannon Eckel is a horse killer.
- d. Shannon Eckel needs to make friends with a rope.
- e. "Horse Killer" Shannon Eckel who abuses and neglects horses in her care.
- f. Cruelty is this business' specialty, killing horses as well.
- g. This place is awful, and they will kill your horse.
- h. "Horse Killer"

21. The Defendants and their coconspirators published these statements to third parties.

22. Defendants posted these false allegations on Facebook, a public social media platform and on other social media platforms accessible to numerous third parties.

23. The posted false allegations were intended to draw additional users into the conspiracy; and others were drawn in and joined in the attacks. The named defendants are liable for the defamatory allegations made by those who were drawn into the attack and who thereby became part of the conspiracy to injure and damage the Plaintiff.

24. Defendants intentionally published the defamatory statements and encouraged others to do the same. The Defendants acted with reckless disregard for the truth, with reckless disregard for the effect their conduct would have on the Plaintiffs. .

25. The Defendants made the false claims without any investigation of the facts or knowledge about the alleged event, demonstrating reckless disregard for the truth in their actions.

26. The defamatory statements caused great and irreparable harm to the Plaintiffs.

27. As a result of these defamatory posts and comments, the Plaintiffs have suffered monetary losses and damage to their reputation. They have lost customers, and have suffered damages to their reputation.

28. Plaintiff Shannon Eckel has experienced great mental distress due to these false allegations. She has been unable to sleep, is depressed, is unable to eat normally, cries often and suffers feelings of helplessness in the face of the abusive and hurtful actions carried out by the Defendants and the others who have been recruited into the attack by the lies spread by the Defendants.

29. The Plaintiffs are entitled to actual damages and because the Defendants have acted willfully and with reckless disregard for the truth, the Plaintiffs are entitled to punitive damages.

30. The Plaintiffs demand judgment for actual and punitive against the Defendants jointly and severally in such amount as the Court and Jury may find just.

#### AS A SECOND CAUSE OF ACTION

##### Intentional Infliction of Emotional Distress (against all Defendants)

31 Plaintiffs repeat and reallege the allegations set forth in paragraphs 1 through 30 as if fully set forth herein.

32. Defendants intentionally or recklessly inflicted severe emotional distress on Plaintiff Shannon Eckel by publishing lies about her and about her treatment of horses under her care. The Defendants knew that accusing Shannon of murdering and torturing a horse would cause severe emotional distress to Shannon.

33. The Defendants intended to harm Shannon, and they intended to cause her severe emotional distress as did the others who were drawn into the evil conspiracy created and fostered by the named Defendants. The Defendants enjoyed what they were doing to Shannon and what they had led others to do. The Defendants took special delight in their belief that they were untouchable. All of which is evidence of malice.

34. Defendants published false allegations of horse murder, which they knew or should have known would cause severe emotional distress to Shannon Eckel.

35. The comments made by the named Defendants and their coconspirators demonstrate actual malice against Shannon Eckel and Hat Trick Sporthorses. Those comments include:

- a. Shannon Eckel is a gross human being.
- b. Animal Abuser needs hanging herself.
- c. Pure disgusting evil, Rot in Hell
- d. You are evil and so hated.
- e. Does this woman have children.
- f. Shannon Eckles [sic] (aka Satan) deserves the exact same ending poor

Cobain suffered in her hands and the right thing is for her to pay for this for the rest of her life.

36. Defendants' conduct was extreme and outrageous.

37. Accusing someone of murdering a horse is an extreme and outrageous claim that exceeds all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized community.

38. Defendants' actions were intended to cause Plaintiff Shannon Eckel to suffer emotional distress.



39. As a direct result of Defendants' false accusations, Plaintiff Shannon Eckel has experienced great mental distress.

40. The emotional distress suffered by Plaintiff Shannon Eckel was severe and greater than any reasonable person could be expected to endure. .

41. The severity of being falsely accused of murdering a horse is such that no reasonable person could be expected to endure it without experiencing significant emotional harm.

42. Shannon Eckel has suffered greatly because of the abuse hurled at her by the Defendants. She has been threatened with physical harm and death. She is unable to sleep. Is depressed and continues to suffer great fear for her safety and the safety of her animals and friends. She is receiving phone calls threatening her and text messages with threats. Neighbors and friends have been frightened by the Defendants' conduct. All because the Defendants, without any actual knowledge and without any investigation to determine the truth set about to destroy an innocent person.

43. Shannon Eckel is entitled to actual and punitive damages from the Defendants jointly and severally in such amount as the Court and Jury may find just.

### THIRD CAUSE OF ACTION

#### Injunction (Against All Defendants)

44. Paragraphs 1 – 43 are realleged.

45. The Plaintiffs and especially Shannon Eckel are suffering and will suffer irreparable harm if the Defendants are not restrained and enjoined from harassing, bothering, coming about, contacting, or communicating with the Plaintiff. The Defendants should be

required to remove all defamatory and false material from every social media outlet including Factbook and Instagram and all other social medial platforms.

46. The Plaintiffs therefore believe that the Court should enter an immediate, pendente lite and permanent Order restraining the Defendants from posting false and defamatory materials on any social media outlet including but not limited to Facebook and Instagram and the Defendants should be ordered to remove all posts or comments attacking the Plaintiffs.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment against Defendants as follows:

A. AS TO THE FIRST CAUSE OF ACTION: Actual and punitive damages against all Defendants

B. AS TO THE SECOND CAUSE OF ACTION: Actual and punitive damages against all Defendants for the intentional infliction of mental anguish and emotional distress suffered by the Plaintiff Shannon Eckel; and.

C. AS TO THE THIRD CAUSE OF ACTION: Immediate, pendente lite and permanent Injunctive relief ordering Defendants to remove all defamatory posts and comments from Facebook and other social media platforms and to refrain from making any further defamatory statements about the Plaintiffs.

D. AS TO ALL CAUSES OF ACTION: For the costs of litigation to be assessed against the Defendants.

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