

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENWOOD)
)
)
Amanda Seymour,)
)
Plaintiff,)
vs.)
)
Town of Ninety Six; Mayor Gregg)
Brown in his personal capacity; and)
Jimmie Brown in her personal)
capacity,)
)
Defendants.)

IN THE COURT OF COMMON PLEAS
EIGHTH JUDICIAL CIRCUIT

**ANSWER AND COUNTERCLAIM
TO AMENDED COMPLAINT**

Case No.: 2026-CP-24-00277

Comes now the Defendant Jimmie Brown (“Defendant J. Brown”) in regard to the above captioned matter, by and through her undersigned attorney answering and counterclaiming in regard to the Plaintiff’s Amended Complaint and would show unto this honorable Court:

FOR A FIRST DEFENSE
(General Denial)

1. The Defendant J. Brown denies each and every allegation contained in the Plaintiff’s Amended Complaint not herein specifically admitted, modified, or explained and strict proof is required thereof.

FOR A SECOND DEFENSE
(Specific Denial)

2. The Defendant J. Brown incorporates her First Defense into this her Second Defense as if restated herein verbatim.

3. Upon information and belief, Defendant J. Brown admits the allegations of Paragraphs 1, 2, 3 and 4 of the Plaintiff’s Amended Complaint.

4. The Defendant J. Brown denies Paragraph 5 of the Plaintiff's Amended Complaint and would demand strict and exacting proof thereof.
5. The Defendant J. Brown admits so much of Paragraph 6 of the Plaintiff's Amended Complaint that venue is proper in Greenwood County but would deny the balance of the paragraph and demand strict and exacting proof thereof.
6. The Defendant J. Brown admits Paragraph 7 of the Plaintiff's Amended Complaint.
7. That upon information and belief Defendant J. Brown admits Paragraphs 8 and 9 of the Plaintiff's Amended Complaint.
8. That upon information and belief Defendant J. Brown admits so much of Paragraph 10 and 11 of the Plaintiff's Amended Complaint that he was a volunteer for the town and would demand strict and exacting proof of the balance of the allegations.
9. The Defendant J. Brown would admit Paragraph 12 of the Plaintiff's Amended Complaint.
10. The Defendant J. Brown admits so much of Paragraph 13 of the Plaintiff's Amended Complaint in that photographs of Plaintiff and her children were taken at a family outing and would demand strict and exacting proof to the extent that Plaintiff's Amended Complaint implies some level of inappropriateness in the display of such photographs.
11. The Defendant J. Brown would admit Paragraphs 14 and 15 of the Plaintiff's Amended Complaint.
12. The Defendant J. Brown would deny Paragraph 16 of the Plaintiff's Amended Complaint and would demand strict and exacting proof thereof. Defendant J. Brown restates that Brian Sill was not an employee of the town except on a volunteer basis.
13. The Defendant J. Brown would deny Paragraphs 17 of the Plaintiff's Amended Complaint and would demand strict and exacting proof thereof.

14. The Defendant J. Brown would deny Paragraph 18 of the Plaintiff's Complaint and would demand strict and exacting proof thereof.
15. The Defendant J. Brown has no knowledge of Paragraphs 19 through and 28 of the Plaintiff's Amended Complaint and would therefore denies the same and would demand strict and exacting proof thereof.
16. The Defendant J. Brown denies Paragraph 29 of the Plaintiff's Amended Complaint and would demand strict and exacting proof thereof.
17. The Defendant J. Brown incorporates her First and Second Defenses regarding the added statement between Paragraphs 29 and 30 as if restated herein verbatim.
18. The Defendant J. Brown is without sufficient information as to Paragraphs 30 through 39 of the Plaintiff's Amended Complaint and therefore, denies the same, and would demand strict and exacting proof thereof.
19. The Defendant J. Brown is without sufficient information as to Paragraphs 40 through 46 of the Plaintiff's Amended Complaint therefore denies the same, and would demand strict and exacting proof thereof.
20. The Defendant J. Brown is without sufficient information as to Paragraphs 47 through 54 of the Plaintiff's Amended Complaint, therefore denies the same, and would demand strict and exacting proof thereof.
21. As to Paragraph 55 of the Plaintiff's Amended Complaint, the Defendant incorporates the allegations of her previous defenses that are consistent with this defense.
22. The Defendant J. Brown denies Paragraph 56 of the Plaintiff's Amended Complaint and would demand strict and exacting proof thereof.

23. As to Paragraph 57 of the Plaintiff's Amended Complaint the Defendant J. Brown admits that she answered a question asked by the Plaintiff without the vulgar language and would deny the same and demand strict and exacting proof thereof.

24. The Defendant J. Brown denies Paragraphs 58 through 61 of the Plaintiff's Amended Complaint, therefore deny the same and would demand strict and exacting proof thereof.

FOR A THIRD DEFENSE
BY WAY OF COUNTERCLAIM

36. That the Plaintiff directly or by and through her agents has contributed to the false allegations through verbal and written media outlets, including her church family leading the necessity for medical treatment for Defendant's PTSD.

37. That the Plaintiff has exaggerated the comment which was a response to a question by her as to the whereabouts of her husband.

38. That the Plaintiff failed to explain the majority of the witnesses to the alleged comments were friends of the Plaintiff and the number involved was minimal.

39. That due to the false allegations and spread of untruthful information the Defendant J. Brown has been forced to seek medical treatment.

40. That Plaintiff's public statements set forth above are false, defamatory and place Defendant's person and reputation in a false light.

41. That Defendant has been damaged by said statements and that she is entitled to such judgment for said damages which an enlightened jury may award.

WHEREFORE Defendant J. Brown prays:

1. That the relief sought by Plaintiff be denied;

2. For payment of medical bills and restitution for mental anguish as a jury may award.
3. For attorney fees and costs of this action as actual and special damages, and
4. For the Court to grant such and further relief as just, fair and equitable.

/s/ Edward S. McCallum, III
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May 8, 2026
Greenwood, South Carolina