

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 Michelle S. Grant)
)
 Plaintiff(s))
)
 vs.)
)
 Hannah Deremer)
)
 Defendant(s))

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2018-CP - 10- 5321

Submitted By: Mark Bringardner
 Address: Joye Law Firm
 5861 Rivers Avenue
 North Charleston, SC 29406

SC Bar #: 102465
 Telephone #: 843 554 3100
 Fax #: 843 529 9180
 Other:
 E-mail: mbringardner@joyelawfirm.com,

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint. NON-JURY TRIAL demanded in complaint.
- This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|--|--|---|---|
| <p>Contracts</p> <ul style="list-style-type: none"> <input type="checkbox"/> Constructions (100) <input type="checkbox"/> Debt Collection (110) <input type="checkbox"/> General (130) <input type="checkbox"/> Breach of Contract (140) <input type="checkbox"/> Fraud/Bad Faith (150) <input type="checkbox"/> Failure to Deliver/Warranty (160) <input type="checkbox"/> Employment Discrim (170) <input type="checkbox"/> Employment (180) <input type="checkbox"/> Other (199) | <p>Torts - Professional Malpractice</p> <ul style="list-style-type: none"> <input type="checkbox"/> Dental Malpractice (200) <input type="checkbox"/> Legal Malpractice (210) <input type="checkbox"/> Medical Malpractice (220) Previous Notice of Intent Case # 20__-NI-__-__ <input type="checkbox"/> Notice/ File Med Mal (230) <input type="checkbox"/> Other (299) | <p>Torts – Personal Injury</p> <ul style="list-style-type: none"> <input type="checkbox"/> Conversion (310) <input checked="" type="checkbox"/> Motor Vehicle Accident (320) <input type="checkbox"/> Premises Liability (330) <input type="checkbox"/> Products Liability (340) <input type="checkbox"/> Personal Injury (350) <input type="checkbox"/> Wrongful Death (360) <input type="checkbox"/> Assault/Battery (370) <input type="checkbox"/> Slander/Libel (380) <input type="checkbox"/> Other (399) | <p>Real Property</p> <ul style="list-style-type: none"> <input type="checkbox"/> Claim & Delivery (400) <input type="checkbox"/> Condemnation (430) <input type="checkbox"/> Foreclosure (420) <input type="checkbox"/> Mechanic's Lien (430) <input type="checkbox"/> Partition (440) <input type="checkbox"/> Possession (450) <input type="checkbox"/> Building Code Violation (460) <input type="checkbox"/> Other (499) |
| <p>Inmate Petitions</p> <ul style="list-style-type: none"> <input type="checkbox"/> PCR (500) <input type="checkbox"/> Mandamus (520) <input type="checkbox"/> Habeas Corpus (530) <input type="checkbox"/> Other (599) | <p>Administrative Law/Relief</p> <ul style="list-style-type: none"> <input type="checkbox"/> Reinstate Drv. License (800) <input type="checkbox"/> Judicial Review (810) <input type="checkbox"/> Relief (820) <input type="checkbox"/> Permanent Injunction (830) <input type="checkbox"/> Forfeiture-Petition (840) <input type="checkbox"/> Forfeiture—Consent Order (850) <input type="checkbox"/> Other (899) | <p>Judgments/Settlements</p> <ul style="list-style-type: none"> <input type="checkbox"/> Death Settlement (700) <input type="checkbox"/> Foreign Judgment (710) <input type="checkbox"/> Magistrate's Judgment (720) <input type="checkbox"/> Minor Settlement (730) <input type="checkbox"/> Transcript Judgment (740) <input type="checkbox"/> Lis Pendens (750) <input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760) <input type="checkbox"/> Confession of Judgment (770) <input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780) <input type="checkbox"/> Other (799) | <p>Appeals</p> <ul style="list-style-type: none"> <input type="checkbox"/> Arbitration (900) <input type="checkbox"/> Magistrate-Civil (910) <input type="checkbox"/> Magistrate-Criminal (920) <input type="checkbox"/> Municipal (930) <input type="checkbox"/> Probate Court (940) <input type="checkbox"/> SC DOT (950) <input type="checkbox"/> Worker's Comp (960) <input type="checkbox"/> Zoning Board (970) <input type="checkbox"/> Public Service Comm. (990) <input type="checkbox"/> Employment Security Comm (991) <input type="checkbox"/> Other (999) |
| <p>Special/Complex /Other</p> <ul style="list-style-type: none"> <input type="checkbox"/> Environmental (600) <input type="checkbox"/> Automobile Arb. (610) <input type="checkbox"/> Medical (620) <input type="checkbox"/> Other (699) <input type="checkbox"/> Sexual Predator (510) <input type="checkbox"/> Pharmaceuticals (630) <input type="checkbox"/> Unfair Trade Practices (640) <input type="checkbox"/> Out-of State Depositions (650) <input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660) <input type="checkbox"/> Pre-Suit Discovery (670) | | | |

2018 NOV - 5
 COURT OF COMMON PLEAS
 CHARLESTON, SC

Submitting Party Signature: _____

Date: November 2, 2018

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

FOR MANDATED ADR COUNTIES ONLY

Aiken, Allendale, Anderson, Bamberg, Barnwell, Beaufort, Berkeley, Calhoun, Charleston, Cherokee, Clarendon, Colleton, Darlington, Dorchester, Florence, Georgetown, Greenville, Hampton, Horry, Jasper, Kershaw, Lee, Lexington, Marion, Oconee, Orangeburg, Pickens, Richland, Spartanburg, Sumter, Union, Williamsburg, and York

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

You are required to take the following action(s):

1. The parties shall select a neutral and file a “Proof of ADR” form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the “Notice of Intent to File Suit” or as the court directs. (Medical malpractice mediation is mandatory statewide.)
4. Cases are exempt from ADR only upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

Please Note: You must comply with the Supreme Court Rules regarding ADR. Failure to do so may affect your case or may result in sanctions.

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
Michelle S. Grant,)
)
Plaintiff,)
)
vs.)
)
Hannah Deremer,)
)
Defendant.)
_____)

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO.: 2018-CP-10- 5321


Summons
(Automobile Collision/Negligence)
(Jury Trial Demanded)

2018 NOV -5 AM 12:28
JUDICIAL CIRCUIT CLERK OF COURT

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to appear and defend the action(s) set forth in the Complaint herein, a copy of which is served upon you, and to serve a copy of your Answer or Motion to the said Complaint on the Joye Law Firm at 5861 Rivers Avenue North Charleston, SC 29406, within thirty (30) days after service hereof, exclusive of the day of service, and if you fail to appear and defend within the time aforesaid, judgment by default will be entered against you for the relief demanded in the Complaint.

JOYE LAW FIRM, L.L.P.

By: 

Mark J. Bringardner
Post Office Box 62888
5861 Rivers Avenue (29406)
North Charleston, SC 29419
Office: 843-554-3100
Facsimile: 843-529-9180
mbringardner@joyelawfirm.com
Attorney for the Plaintiff

North Charleston, South Carolina
This 2nd day of November, 2018.

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
Michelle S. Grant,)
)
Plaintiff,)
)
vs.)
)
Hannah Deremer,)
)
Defendant.)
_____)

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO.: 2018-CP-10-5321

Complaint
(Automobile Collision/Negligence)
(Jury Trial Demanded)

2018 NOV - 5 AM 12:28
JULIE B. BARNETT
CLERK OF COURT

The Plaintiff, complaining of the Defendant above-named, hereby alleges and pleads as follows:

1. Plaintiff is a resident of the County of Charleston, State of South Carolina.
2. Defendant is a resident of the County of Charleston, State of South Carolina.
3. At all relevant times hereto, the most substantial part of the acts and omissions committed by Defendant giving rise to this action occurred in Charleston County, South Carolina.
4. This Court has jurisdiction pursuant to S.C. Code Ann. 15-7-30.
5. On October 24, 2017, Plaintiff was driving north bound on Attaway Street in North Charleston, South Carolina. Defendant Deremer was driving south bound on Attaway Street. A stop sign controls traffic at the intersection of Attaway Street and Sumner Avenue. Plaintiff stopped at the stop sign and then proceeded to turn left on to Sumner Avenue. Defendant Deremer did not stop at the stop sign and crashed into the Plaintiff's vehicle. Plaintiff and her son were injured as a result of the collision. Defendant was driving at an unsafe speed for the traffic conditions, failed to keep a proper lookout, failed to stop at the stop sign, and failed to yield the right of way, all of which were negligent and the proximate cause of the injuries damages alleged herein.

6. Defendant owed a duty to Plaintiff to operate her vehicle safely, with reasonable care, and in accordance with all laws concerning the operation of a motor vehicle.

7. Defendant was negligent, willful, wanton, and reckless and breached the duties she owed to Plaintiff in one or more of the following ways:

- (a) In operating her vehicle in a negligent and/or reckless manner;
- (b) In driving too fast for the conditions;
- (c) Failing to use due care;
- (d) Failing to yield the right of way;
- (e) Failing to keep her vehicle under proper control;
- (f) In following too closely;
- (g) Failing to keep a proper lookout;
- (h) Failing to have her vehicle equipped with proper brakes and, if so equipped, in failing to timely apply the brakes;
- (i) Failing to use the degree of care and caution that a reasonably prudent driver would have used under the circumstances then and there prevailing;
- (j) Otherwise operating her vehicle without exercising reasonable care and in a negligent, willful, wanton, and reckless manner; and
- (k) Violating various statues, codes, and ordinances designed to protect the public, including Plaintiff, from the type of harm that was caused by the Defendant's conduct related to the subject collision.

8. Defendant's negligent, willful, wanton, and reckless conduct and breach of the duties owed to Plaintiff were the direct and proximate cause of the October 24, 2017, collision described herein.


9. As a direct and proximate cause of Defendant's negligent, willful, wanton, and reckless conduct and breach of the duties owed to Plaintiff, Plaintiff sustained debilitating injuries to her body.

10. As a direct and proximate cause of Defendant's negligent, willful, wanton, and reckless conduct and breach of the duties owed to Plaintiff, Plaintiff has suffered damages in the form of physical injury and harm, property damage, past and future medical expenses, past and future physical and mental pain and suffering, lost income, and loss of enjoyment of life.

WHEREFORE, Plaintiff demands judgment against Defendant for actual and punitive damages, including damages for physical injury and harm, property damage, past and future medical expenses, past and future physical and mental pain and suffering, lost income, loss of enjoyment of life, for the costs of this action, and for any additional relief this Court deems just and proper.

JOYE LAW FIRM, L.L.P.

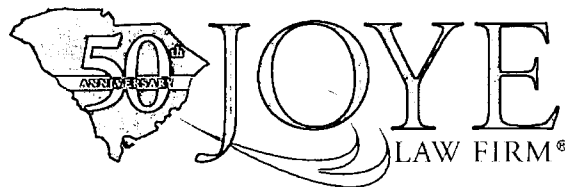
By:



Mark J. Bringardner
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North Charleston, SC 29419
Office: 843-554-3100
Facsimile: 843-529-9180
mbringardner@joyelawfirm.com

Attorney for the Plaintiff

North Charleston, South Carolina
This 2nd day of November, 2018.



Charleston Myrtle Beach Clinton Columbia

Please Reply To:
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Mark Bringardner
Email: mbringardner@joyelawfirm.com

November 2, 2018

Charleston County Clerk of Court
The Honorable Julie Armstrong
100 Broad Street, Suite 106
Charleston, SC 29401

Re: **Michelle S. Grant v. Hannah Deremer**

Dear Mrs. Armstrong:

Enclosed for filing please find the original and two (2) additional copies of the Civil Cover Sheet along with the Summons and Complaint regarding the above-referenced matter. I have also enclosed our firm's check in the amount of \$ 150.00 for the filing fee of same. I would appreciate your filing the original with your office and returning the additional filed copies in the envelope provided.

Thank you for your attention to this matter and if you should have any questions, please do not hesitate to contact me.

Very truly yours,

JOYE LAW FIRM, L.L.P.

Mark Bringardner

MB/sdd
Enclosures