

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

MICHELLE S. GRANT,)
)
Plaintiff,)
)
v.)
)
HANNAH DEREMER,)
)
Defendant.)
_____)

IN THE COURT OF COMMON PLEAS
Docket No.: 2018-CP-10-5321

**ANSWER
(Jury Trial Demanded)**

FILED
2018 DEC 12 PM 2:54
JULIE J. ARMSTRONG
CLERK OF COURT

Defendant answers and respectfully shows unto the Court:

FOR A FIRST DEFENSE

1. Except as specifically admitted, qualified, or explained, Defendants deny the allegations and demands strict proof of each allegation.
2. Upon information and belief, Defendant admits the allegations of Paragraph 1.
3. Defendant admits the allegations of Paragraph 2.
4. Defendant admits only so much of the allegations of Paragraphs 3-4 as allege a civil lawsuit may be filed with the Charleston County Court of Common Pleas.
5. Defendant admits of the allegations of Paragraphs 5-10 as allege an automobile accident occurred between the parties on October 24, 2017 on Attaway Street in North Charleston, and Defendant admits simple negligence. Defendant lacks sufficient knowledge or information to form a belief about the truth of the damages claimed by Plaintiff at this time. Therefore, Defendant denies those allegations and demands strict proof of each allegation.

**AS AN ADDITIONAL DEFENSE
(Reservation of Rights)**

6. FURTHER ANSWERING, Defendant has not had an opportunity to conduct a sufficient investigation or engage in adequate discovery about the allegations of this lawsuit. Defendant gives notice of the intent to assert any

further affirmative defenses that any investigation supports, including, but not limited to, defenses that the action is barred in whole or in part by any applicable statute, contract, release, covenant, or the doctrine of laches. Thus, Defendant reserves the right to amend this pleading to assert any such defenses.

AS AN ADDITIONAL DEFENSE
(Punitive Damages)

7. FURTHER ANSWERING, any award of punitive damages would violate the constitutional safeguards provided by the Due Process Clause of the Fourteenth Amendment of the United States Constitution and under the Due Process Clause of Article I, Section 3 of the South Carolina Constitution because the determination of punitive damages does not bear any reasonable relationship to the amount of actual damages, if any, suffered by or awarded.

WHEREFORE, having answered, Defendant asks this Court to dismiss the Complaint and to grant such other and further relief as this Court deems just and proper.


TURNER PADGET

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Charleston, South Carolina

December 10, 2018

ATTORNEYS FOR DEFENDANT

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

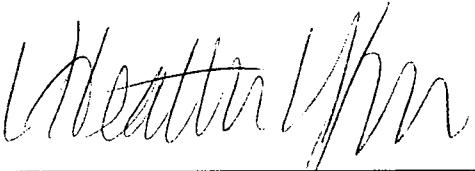
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IN THE COURT OF COMMON PLEAS
Docket No.: 2018-CP-10-5321

CERTIFICATE OF SERVICE

On December 10, 2018, I mailed a copy of **Defendant's Answer and discovery requests** to:

Mark J. Bringardner
Post Office Box 62888
North Charleston, South Carolina 29419
Attorney for Plaintiff



Heather Hagen

BY _____
JULIE J. ARMSTRONG
CLERK OF COURT
2018 DEC 12 PM 2:54

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December 10, 2018

Julie J. Armstrong
Charleston County Clerk of Court
100 Broad Street, Suite 106
Charleston, South Carolina 29401-2210

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

Docket No.: 2018-CP-10-5321

TP File No.: 4000.2513

Dear Ms. Armstrong:

We enclose the original and one copy of the Defendant's Answer to the Complaint in this case. Please file the original and return a filed copy to me in the enclosed envelope. By copy of this letter, we are serving a copy and discovery requests to Plaintiff's attorney. If you have any questions or need additional information, please call me at your convenience. With kind regards,

TURNER PADGET



David S. Cobb

DSC/hah

enclosures

cc: Mark Bringardner (with enclosures)