

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTONMONIQUE C. ROBINSON

Plaintiff(s)

vs.

BRITTANY E. BRYANT

Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2018-CP - 10- 2598

Submitted By: STEVEN E. GOLDBERG
 Address: STEINBERG LAW FIRM
P.O. BOX 2670
SUMMERVILLE, SC 29484

SC Bar #: 66446
 Telephone #: (843) 871-6522
 Fax #: (843) 871-8565
 Other: _____
 E-mail: sgoldberg@steinberglawfirm.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 cases that are NOT E-Filed. 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. **This form is NOT required to be filed in E-Filed Cases.**

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)

- | | | | |
|---|--|--|--|
| Contracts
<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) _____ | Torts - Professional Malpractice
<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) _____ | Torts - Personal Injury
<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) _____ | Real Property
<input type="checkbox"/> Claim & Deliver (400)
<input type="checkbox"/> Condemnation (410)
<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) _____ |
| Inmate Petitions
<input type="checkbox"/> PCR (500)
<input type="checkbox"/> Mandamus (520)
<input type="checkbox"/> Habeas Corpus (530)
<input type="checkbox"/> Other (599) _____ | Administrative Law/Relief
<input type="checkbox"/> Reinstatement 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) _____ | Judgments/Settlements
<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"/> Incapacitated Adult Settlement (790)
<input type="checkbox"/> Other (799) _____ | Appeals
<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"/> SCDOT (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) _____ |
| Special/Complex /Other
<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"/> Permanent Restraining Order (680)
<input type="checkbox"/> Interpleader (690) | | | |
| <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) | | | |

Submitting Party Signature: _____

Date: May 21, 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.

Effective January 1, 2016, Alternative Dispute Resolution (ADR) is mandatory in all counties, pursuant to Supreme Court Order dated November 12, 2015.

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

Pursuant to the ADR Rules, 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.
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

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

Case No.: 2018-CP-10-2598

Monique C. Robinson,

Plaintiff,

v.

Brittany E. Bryant,

Defendant.

SUMMONS

2018 MAY 22 AM 11:54
JULIE J. ARMSTRONG
CLERK OF COURT

FILED

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to Answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to the said Complaint upon the Plaintiff through her attorney, Steven E. Goldberg, Esquire, at his office at PO Box 2670, Summerville, SC 29484, within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to Answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

DATED at Summerville, South Carolina, this 21st day of May, 2018.

THE STEINBERG LAW FIRM, L.L.P.
PO Box 50577
Summerville, SC 29485
(843) 871-6522 - office
(843) 871-8565 - facsimile

By: _____

Steven E. Goldberg
Kelly M. Alfreds
Attorneys for Plaintiff

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

Case No.: 2018-CP-10- 2598

Monique C. Robinson,

Plaintiff,

v.

Brittany E. Bryant,

Defendant.

COMPLAINT

FILED
2018 MAY 22 AM 11:54
JULIE J. HARTSTRONG
CLERK OF COURT

TO THE ABOVE NAMED DEFENDANT(S):

Plaintiff, complaining of the Defendant above-named would respectfully allege and show unto this Honorable Court:

1. Plaintiff is a resident of Charleston County, South Carolina, and at the time of the collision herein mentioned the driver of a 2014 Nissan with South Carolina License plate JRW476 for the year 2016.

2. Upon information and belief, the Defendant is a resident of Charleston County, South Carolina and at the time of the occurrence herein mentioned was the owner and driver of a 2004 Nissan with South Carolina License plate JDQ606 for the year 2016.

3. On January 7, 2016, at approximately 7:20 a.m. the Plaintiff was lawfully driving a 2014 Nissan and was traveling east on Rivers Avenue when she stopped for traffic ahead of her. Defendant was driving a 2004 Nissan east on Rivers Avenue behind Plaintiff. Defendant unlawfully failed to keep a proper lookout, did not stop and slammed into the rear of Plaintiff's vehicle.

4. As a direct and proximate result of the Defendant's negligence, carelessness, and recklessness, the Plaintiff suffered great physical harm and injury from being thrown about the vehicle, which has and will in the future cause her to undergo much physical pain and suffering, has and will in the future cause her to spend money for medical services, and has and will in the future cause her to lose money in the nature of wages and earnings.

5. The Defendant was negligent, willful, wanton, careless, reckless, and grossly negligent at the time and place above mentioned in the following particulars:

- (a) In failing to maintain a proper lookout;
- (b) In failing to keep her vehicle under proper control;
- (c) In driving too fast for conditions;
- (d) In failing to yield the right of way;
- (e) In failing to apply her brakes;
- (f) In failing to use that degree of care and caution that a reasonable and prudent person would have used under the circumstances then and there prevailing.
- (g) In failing to abide by local and state laws;

All of which were the direct and proximate cause of the injuries and damages suffered by the Plaintiff herein. Said acts being in violation of the statute laws of the State of South Carolina.

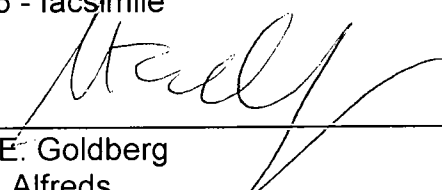
6. Plaintiff is informed and believes that she is entitled to judgment against the Defendant for actual and punitive damages in an appropriate amount.

WHEREFORE, Plaintiff prays for judgment against the Defendant for actual

damages, together with punitive damages in an appropriate amount, for the costs of this action and for such other and further relief as to this Court may seem just and proper.

THE STEINBERG LAW FIRM, L.L.P.
PO Box 2670
Summerville, SC 29484
(843) 871-6522 - office
(843) 871-8565 - facsimile

By: _____


Steven E. Goldberg
Kelly M. Alfreds
Attorneys for Plaintiff

Summerville, South Carolina
May 21, 2018

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May 21, 2018

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

Re: Monique C. Robinson v. Brittany E. Bryant
Our File No.: 2016-12-004

Dear Mrs. Armstrong:

Enclosed for filing, please find the original and four (4) copies of Summons and Complaint in the above referenced case. I kindly ask that you file the original and return the filed and stamped copies to my office in the self-addressed, stamped envelope I have enclosed.

Should you have any questions or concerns, please do not hesitate to contact my office. Thank you in advance for your assistance with this matter.

With kindest regards, I am

Sincerely,

Steven E. Goldberg
Email: sgoldberg@steinberglawfirm.com
Direct Fax: (843) 735-6351

SEG/bgc
Enclosures