

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

Ellen Grampus

Plaintiff(s)

vs.

Anquion Jackson

Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2019-CP - 10- 1443

Submitted By: Jeff Buncher, Jr.

Address: PO Box 399

Charleston, SC 29402

SC Bar #: 788901

Telephone #: 843-723-7491

Fax #: 843-577-4179

Other:

E-mail: jeff@uricchio.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*

- X **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.
- X 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 | Torts - Professional Malpractice | Torts - Personal Injury | Real Property |
| <input type="checkbox"/> Constructions (100) | <input type="checkbox"/> Dental Malpractice (200) | <input type="checkbox"/> Conversion (310) | <input type="checkbox"/> Claim & Delivery (400) |
| <input type="checkbox"/> Debt Collection (110) | <input type="checkbox"/> Legal Malpractice (210) | X <input checked="" type="checkbox"/> Motor Vehicle Accident (320) | <input type="checkbox"/> Condemnation (410) |
| <input type="checkbox"/> General (130) | <input type="checkbox"/> Medical Malpractice (220) | <input type="checkbox"/> Premises Liability (330) | <input type="checkbox"/> Foreclosure (420) |
| <input type="checkbox"/> Breach of Contract (140) | Previous Notice of Intent Case # | <input type="checkbox"/> Products Liability (340) | <input type="checkbox"/> Mechanic's Lien (430) |
| <input type="checkbox"/> Fraud/Bad Faith (150) | 20 <u>-NI-</u> | <input type="checkbox"/> Personal Injury (350) | <input type="checkbox"/> Partition (440) |
| <input type="checkbox"/> Failure to Deliver/
Warranty (160) | <input type="checkbox"/> Notice/ File Med Mal (230) | <input type="checkbox"/> Wrongful Death (360) | <input type="checkbox"/> Possession (450) |
| <input type="checkbox"/> Employment Discrim (170) | <input type="checkbox"/> Other (299) _____ | <input type="checkbox"/> Assault/Battery (370) | <input type="checkbox"/> Building Code Violation (460) |
| <input type="checkbox"/> Employment (180) | | <input type="checkbox"/> Slander/Libel (380) | <input type="checkbox"/> Other (499) _____ |
| <input type="checkbox"/> Other (199) _____ | | <input type="checkbox"/> Other (399) _____ | |
| Inmate Petitions | Administrative Law/Relief | Judgments/Settlements | Appeals |
| <input type="checkbox"/> PCR (500) | <input type="checkbox"/> Reinstate Drv. License (800) | <input type="checkbox"/> Death Settlement (700) | <input type="checkbox"/> Arbitration (900) |
| <input type="checkbox"/> Mandamus (520) | <input type="checkbox"/> Judicial Review (810) | <input type="checkbox"/> Foreign Judgment (710) | <input type="checkbox"/> Magistrate-Civil (910) |
| <input type="checkbox"/> Habeas Corpus (530) | <input type="checkbox"/> Relief (820) | <input type="checkbox"/> Magistrate's Judgment (720) | <input type="checkbox"/> Magistrate-Criminal (920) |
| <input type="checkbox"/> Other (599) _____ | <input type="checkbox"/> Permanent Injunction (830) | <input type="checkbox"/> Minor Settlement (730) | <input type="checkbox"/> Municipal (930) |
| | <input type="checkbox"/> Forfeiture-Petition (840) | <input type="checkbox"/> Transcript Judgment (740) | <input type="checkbox"/> Probate Court (940) |
| | <input type="checkbox"/> Forfeiture—Consent Order (850) | <input type="checkbox"/> Lis Pendens (750) | <input type="checkbox"/> SCDOT (950) |
| | <input type="checkbox"/> Other (899) _____ | <input type="checkbox"/> Transfer of Structured
Settlement Payment Rights
Application (760) | <input type="checkbox"/> Worker's Comp (960) |
| Special/Complex /Other | | <input type="checkbox"/> Confession of Judgment (770) | <input type="checkbox"/> Zoning Board (970) |
| <input type="checkbox"/> Environmental (600) | <input type="checkbox"/> Pharmaceuticals (630) | <input type="checkbox"/> Petition for Workers
Compensation Settlement
Approval (780) | <input type="checkbox"/> Public Service Comm. (990) |
| <input type="checkbox"/> Automobile Arb. (610) | <input type="checkbox"/> Unfair Trade Practices (640) | <input type="checkbox"/> Other (799) _____ | <input type="checkbox"/> Employment Security Comm (991) |
| <input type="checkbox"/> Medical (620) | <input type="checkbox"/> Out-of State Depositions (650) | | <input type="checkbox"/> Other (999) _____ |
| <input type="checkbox"/> Other (699) _____ | <input type="checkbox"/> Motion to Quash Subpoena in
an Out-of-County Action (660) | | |
| <input type="checkbox"/> Sexual Predator (510) | <input type="checkbox"/> Pre-Suit Discovery (670) | | |
| <input type="checkbox"/> Permanent Restraining Order (680) | | | |

Submitting Party Signature: _____

Date: 3/20/19

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

Ellen Grampus,

Plaintiff,

vs.

Anquion Jackson,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2019-CP-10- 1443

SUMMONS

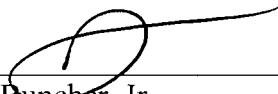
FILED
2019 MAR 21 AM 11:41
JULIE J. ARMSTRONG
CLERK OF COURT
BY _____

TO THE DEFENDANT ABOVE-NAMED:

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the South Carolina Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Jeff Buncher, Jr., at the address shown below. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

URICCHIO, HOWE, KRELL, JACOBSON,
TOPOREK, THEOS & KEITH, P.A.


Jeff Buncher, Jr.

17 ½ Broad Street – Post Office Box 399
Charleston, South Carolina 29402
Tel: (843) 723-7491; Fax: (843) 577-4179
Attorneys for Plaintiff

March 20, 2019
Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

Ellen Grampus,

Plaintiff,

vs.

Anquion Jackson,

Defendant.

) IN THE COURT OF COMMON PLEAS
) FOR THE NINTH JUDICIAL CIRCUIT

) CASE NO.: 2019-CP-10-1443

) **COMPLAINT**

) Jury Trial Requested

2019 MAR 21 AM 11:41
JULIE J. ARMSTRONG
CLERK OF COURT
BY _____

Plaintiff, complaining of Defendant, alleges and says:

PARTIES

1. Plaintiff is and was at all times mentioned herein a citizen and resident of Charleston County, South Carolina.

2. Upon information and belief, Defendant Anquion Jackson is and was at all times mentioned herein a citizen and resident of Charleston County, South Carolina.

JURISDICTION

3. The Court has subject-matter jurisdiction over the claims in this lawsuit under article V, § 11, of the South Carolina Constitution and South Carolina Code § 14-5-350.

4. The Court has personal jurisdiction over Defendant.

VENUE

5. Venue is proper in this circuit under South Carolina Code § 15-7-30.

FACTS

6. On or about May 24, 2018, at approximately 8:30 a.m., Defendant was the owner and operator of a 2012 Chevrolet sedan bearing South Carolina license plate number MUD234 for the year 2018 and was traveling in an easterly direction along or about Cosgrove Avenue.

7. At the time and place aforementioned, Plaintiff was the owner and operator of a 2009 Lexus sedan bearing South Carolina license plate number MIC690 for the year 2019 and was stopped at the traffic light at Azalea and Cosgrove.

8. At the time and place aforementioned, Defendant, suddenly and without warning, struck Plaintiff's motor vehicle, thereby causing a collision and injuring Plaintiff.

FOR A FIRST CAUSE OF ACTION
(Negligence, Gross Negligence)

9. Plaintiff incorporates all allegations of paragraphs above into this cause of action as if set forth verbatim.

10. That the injuries and damages complained of herein were directly and proximately caused by the following negligent, careless, reckless, willful, and grossly negligent acts of Defendant all in violation of the statutes and common laws of the State of South Carolina, combining and concurring:

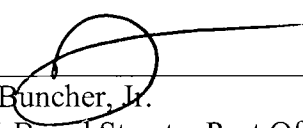
- (a) In failing to keep his automobile under proper control;
- (b) In failing to keep a proper lookout;
- (c) In failing to properly observe the road and traffic conditions;
- (d) In making an improper lane change;
- (e) In failing to use the degree of care and caution that a reasonable and prudent person would have used under the circumstances then and there prevailing;
- (f) In otherwise being negligent, reckless, and careless; and
- (g) For such other acts and omissions that may become more apparent through the discovery and/or trial of this matter.

11. That as a result of the aforesaid negligent, grossly negligent, careless, willful, and reckless acts, Plaintiff has been injured and damaged. Plaintiff has, is and will in the future continue to suffer from the following, including but not limited to: pain and suffering; medical expenses; trauma; loss of enjoyment of life; annoyance and inconvenience and travel and other

damages - all to her injury and damage in an amount of actual and punitive damages to be determined at the trial of this action.

WHEREFORE, Plaintiff requests that judgment be entered against Defendant on all causes of action and that Plaintiff be awarded: actual damages; punitive damages; a trial by jury as to all causes of action properly triable; the costs of this action; and such other and further relief as the Court may deem just and proper.

URICCHIO, HOWE, KRELL, JACOBSON,
TOPOREK, THEOS & KEITH, P.A.



Jeff Buncher, Jr.

17 ½ Broad Street – Post Office Box 399

Charleston, South Carolina 29402

Tel: (843) 723-7491; Fax: (843) 577-4179

Attorneys for Plaintiff

March 20, 2019
Charleston, South Carolina