

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF CHARLESTON	)	Civil Action No. 2020-CP-10-_____
	)	
MEAGAN WHITNEY FENDER,	)	
	)	<b>SUMMONS</b>
Plaintiff,	)	
	)	
v.	)	
	)	
HENRY DUNBAR AND KATHERINE	)	
SCHNEIDER DUNBAR,	)	
	)	
Defendants.	)	

TO THE DEFENDANTS ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to Answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer upon the subscribed at his office, Post Office Drawer 507/1501 North Street, Beaufort, South Carolina 29901, within thirty (30) days from the service hereof, exclusive of the day of such service; and if you fail to Answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded.

MOSS, KUHN & FLEMING, P.A.

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Attorneys for Plaintiff

Beaufort, South Carolina  
March 10, 2020

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	)	
COUNTY OF CHARLESTON	)	Civil Action No. 2020-CP-10-_____
	)	
MEAGAN WHITNEY FENDER,	)	
	)	
Plaintiff,	)	<b>COMPLAINT</b>
	)	<b>(Jury Trial Demanded)</b>
v.	)	
	)	
HENRY DUNBAR AND KATHERINE	)	
SCHNEIDER DUNBAR,	)	
	)	
Defendants.	)	

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The Plaintiff, Meagan Whitney Fender, would show unto this Honorable Court as follows:

1. The Plaintiff, Meagan Whitney Fender, is a citizen and resident of the County of Beaufort, South Carolina.
2. Upon information and belief, the Defendants, Henry Dunbar and Katherine Schneider Dunbar, are a citizens and residents of Charleston County, South Carolina.
3. On or about December 14, 2019 at our around 5:50 p.m. the Plaintiff was driving her 2017 Hyundai automobile and was stopped on Savannah Highway in Charleston County, South Carolina and when suddenly and without warning the Defendant, Henry Dunbar, driving a 2012 Infiniti automobile, which was owned by the Defendant Katherine Schneider Dunbar, ran into the rear of Plaintiff's vehicle.
4. The aforesaid wreck was a direct and proximate result of the careless, negligent, reckless, or willful acts and conduct of the Defendants, in one or more of the following particulars:

AS TO THE DEFENDANT HENRY DUNBAR

- a. In failing to keep a proper lookout;
- b. In failing to maintain his vehicle under proper control;
- c. In failing to maintain proper brakes, or if the brakes were maintained, in failing to use the same;
- e. In failing to stop, turn or alter the course of his vehicle so as to avoid colliding with the vehicle in which the Plaintiff was driving; and
- f. In failing to yield the right of way.

AS TO THE DEFENDANT KATHERINE DUNBAR SCHNEIDER

- a. In being vicariously liable for the acts and conduct of the Defendant Henry Dunbar, his servant, agent and employee;
- b. In entrusting her vehicle to the Defendant Henry Dunbar, when she knew or should have known that said Defendant was not capable of safely operating said automobile.

5. As a direct and proximate result of the acts and conduct of the Defendants as aforesaid, either independently or combining and concurring one with the other, the Plaintiff has suffered personal injuries to her body, she has been forced to seek and undergo emergency medical care and treatment as well as follow-up medical care and treatment, she has incurred medical bills and expenses; she has undergone and continues to undergo mental anguish, as well as pain and suffering, all said damages both past, present and continuing permanently into the future.

**WHEREFORE,** Plaintiff prays for judgment against the Defendants in a fair and reasonable amount of both actual and punitive damages, to be determined by a jury.

MOSS, KUHN & FLEMING, P.A.

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