

99844

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Appellant case No. 2023-001295

Richland County Court Case No. 2023-CP-40-00017

Willie J. Bennett.....Appellant,

Sasha N. Gray, Claire H. Eckert.....Respondent.
and Chick-Fil-a, Inc.

APPELLANT’S SECOND MOTION TO STAY ORDER

Appellant, Willie J. Bennett, Appellant’s Second Motion to Stay appeals the order of the Honorable Maite Murphy dated, August 11, 2023 (**Exhibit A**), denying Plaintiff’s Motion for Amended and Supplemental Pleadings (**Exhibit B**), Plaintiff’s First Request to Amend Motion for Supplemental Proceedings (**Exhibit C**), and Motion to Compel (**Exhibit D**). Appellant received written notice of entry of this order by United States Mail, non-post marked envelope (**Exhibit E**), on August 22, 2023.

RECEIVED
SEP 18 2023
SC Court of Appeals

The Motion Roster Motion Roster Hearing of June 27, 2023, was heard by Judge Murphy. Transcripts of that hearing has been ordered and currently on file with the South Carolina Appeals Court.

On March 6, 2023, Appellant filed Plaintiff Motion for amended and Supplemental Pleadings (**Exhibit B**) with the Court for the reason Defendant and external agencies were delayed in providing requested discovery material pursuant to Rule 33 and 26 of the SCRPC. Rule 15 states: “A party may amend his pleading once as a matter of course at any time before or within 30 days after a responsive pleading is served or, if the pleading is one to which no responsive pleading is required and the action has not been placed upon the trial roster, he may so amend it at any time within 30 days after it is served. Otherwise, a party may amend his pleading only by leave of court or by written consent of the adverse party....” Appellant did not have proper discovery material from Defendants and external agencies as required by Rule 33 and 26 to ascertain proper additional Defendants to amend complaint within the 30-time frame without permission of the Court, as required pursuant to Rule 15, therefore, a motion for extension was requested.

Since proper requested discovery material continued not to be received from Respondents, Appellant filed Plaintiff’s First Request to amend Motion for amended and Supplemental Pleadings (**Exhibit C**).

On June 27, 2022, a Motion Hearing was heard by Judge Maite Murphy via WebEx. Appellant stated to Judge Murphy that many of his motions were not addressed,

specifically, Motions to amend Complaint. Judge Murphy asked who I wished to amend, Appellant response; “continue to have Claire H. Eckert as a Defendant and add 2CE LLC, and Christ Eckert as additional Defendants. The amended Complaint should read,

Sash n. Gray, Claire H. Eckert, 2CE LLC, Christ M. Eckert, and Chick-Fil-A, Inc.

Judge Murphy told Appellant to submit an Affidavit to support his position on Amending his Complaint. Affidavit of Willie J. Bennett in response to Claire H. Eckert (**Exhibit F**) and Affidavit of Willie J. Bennett in Response to Christopher M. Eckert (**Exhibit G**) were submitted properly and timely but were not address or considered by the Court. Judge also told appellant several time not to write or prepare Proposed Orders from the hearing that she would do it for Appellant. No Proposed Orders in this case were prepared by Judge Murphy in the interest of the Appellant. Defendant Attorneys prepared and sent several Proposed Orders to the Judge without notifying the Appellant, as a result, decisions were made in the absence and without presence of the Appellant. Court Transcript will support this statement.

In (**Exhibit A**) Order the Court states; "As to Plaintiff's Motion to Compel, Plaintiff appears to seek and Order compelling defendants to produce insurance information, including the policy number, defendants represented to the Court that a declaration page was produced by Defendants, which articulated the policy number, policy term and policy limits..." Defendant has provided the Court and the Appellant conflicting information throughout the discovery process. Defendants have provided Appellant conflicting insurance information. On separate occasions three (3) different policy numbers and different telephone number of the insurance company, see Motion for Order Compelling Discovery (**Exhibit D**). As of date, Appellant damaged vehicle has not been. No repair facility will accept the vehicle for repair due to the conflicting insurance information provided by the Defendant.

Appellant did not receive a review or decision of his file Motions and other actions that was filed against the Defendants, resulting in an inability to properly process his case.

Defendant Attorneys submitted Proposed Orders without providing copies to Appellant as required by Rules of SCRPC.

The Court amended the Complaint to delete Claire H. Eckert and Chick-Fil-A, Inc., based solely on Defendants Proposed Orders.

Plaintiff maintains that Claire H. Eckert, Chick-Fil-A, Inc., 2CE LLC, and Christ M. Eckert are proper Defendants in this suite. Ms. Eckert is the owner, as verified by the Columbia Police incident report of June 17, 2022 (**Exhibit H**), of the 2019 Honda that displayed the Chick-Fil-A image/logo the employee delivery driver Sasha N. Gray drove when she collided with Appellant's parked vehicle resulting in injury.

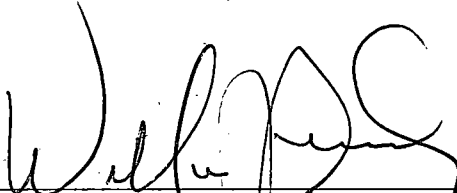
Defendant admitted in discovery that Arch Insurance Company is the same insurance company that insures the Chick-Fil-A Restaurant, insures the 2019 Honda vehicle.

It is of information and belief that Ms. Eckert owns or did own a fleet (multiply vehicle) of Chick-Fil-A image/logo branded delivery vehicles in her name for the restaurant on June 27, 2022 on the date of the accident with Appellant, Willie J. Bennett.

With the evidence submitted to the Court by the Appellant and Appellant is allowed to complete proper discovery, Appellant contends that his position can be supported.

Appellant ask:

- a. **That Appellant is allowed to conduct discovery of Defendant, Claire H. Eckert.**
- b. That the Court allow Appellant to complete proper discovery.
- c. That the Court allow Appellant to proceed with his appeal and
- d. That the Court exercises it discretion in the best interest of both parties.



Willie J. Bennett, Appellant, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

September 18, 2023
Hopkins, South Carolina.

Other Counsels of Record:

Collins Lacy, Attorney at Law
Kelsey J. Brudvig
1330 Lady Street, 6th Floor
Columbia, South Carolina 29201

Sweeny, Wingate & Barrow, P.A.
Christy E Mahon
1515 Lady Street
Columbia, South, Carolina 29201

Collins Lacy, Attorney at Law
ATTN: Kyle L. Brady
1330 Lady Street, 6th Floor
Columbia, South Carolina 29201

EXHIBIT

A

As to Plaintiff's Motion to Compel, Plaintiff appears to seek an Order compelling Defendants to produce insurance information, including the policy number. Defendants represented to the Court that a declaration page was produced by Defendants, which articulated the policy number, policy term, and policy limits. Accordingly, the Court finds that Defendant has produced the requested information. Therefore, Plaintiff's Motion to Compel is DENIED.

IT IS SO ORDERED.

The Honorable Maite Murphy
Presiding Judge



Richland Common Pleas

Case Caption: Willie J Bennett vs Sasha N Gray , defendant, et al
Case Number: 2023CP4000017
Type: Order/Other

So Ordered

s/ Maite Murphy 2166

Electronically signed on 2023-08-11 13:44:11 page 3 of 3

EXHIBIT

B

STATE OF SOUTH CAROLINA

COUNTY OF Richland

WILLIE J. BENNETT

Plaintiff,

vs.

SASHA N. GRAY, CLAIR H. ECKER,
AND CHECKFIELD, INC.

Defendant.

IN THE COURT OF COMMON PLEAS,
~~FIFTH~~ JUDICIAL CIRCUIT

CASE NO.: 2023-CP-40-00017

**MOTION AND ORDER INFORMATION
FORM AND COVERSHEET**

Plaintiff's Attorney: WILLIE J. BENNETT
Bar No. PRO SE
Address: 113 HEALING SPRINGS RD
HOPKINS SC 29061
Phone: _____ Fax _____
E-mail: _____ Other: (803) 319-5740

Defendant's Attorney: COLLINS LACY, ATTORNEY AT LAW
Bar No. _____
Address: ATTN: KELSEY J. BRUDWIG
PO BOX 12487
CO LYM BIR, SC 29211
Phone: _____ Fax _____
E-mail: _____ Other: (803)

- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
- FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
- PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

Nature of Motion: MOTION FOR AMENDED SUPPLEMENTAL PLEADINGS
Estimated Time Needed: 15 MIN Court Reporter Needed: YES / NO

SECTION II: Motion/Order Type
 Written motion attached
 Form Motion/Order
I hereby move for relief or action by the court as set forth in the attached proposed order.
Willie J. Bennett, Pro Se
Signature of Attorney for Plaintiff / Defendant Date submitted _____

SECTION III: Motion Fee
 PAID - AMOUNT: \$ 25.00
 EXEMPT: (check reason)
 Rule to Show Cause in Child or Spousal Support
 Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRPC)
 Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter: _____
 Other: _____

JUDGE'S SECTION
 Motion Fee to be paid upon filing of the attached order.
 Other: _____
JUDGE CODE _____
Date: _____

CLERK'S VERIFICATION
Collected by: _____ Date Filed: 3/10/23
 MOTION FEE COLLECTED: \$ 25.00
 CONTESTED - AMOUNT DUE: \$ _____

RICHLAND COUNTY
 FILED
 MARCH 10 2023
 11:55 AM
 CLERK OF COURT
 G. M. WOODRIDGE

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Willie J. Bennett,

Plaintiff,

vs.

Sasha N. Gray, Claire H. Eckert, and
Chick-Fil-A, Inc.,

Defendants.

IN THE COURT OF COMMON PLEAS

FIFTH JUDICIAL CIRCUIT

Civil Action No.: 2023-CP-40-00017

PLAINTIFF MOTION FOR
AMENDED AND
SUPPLEMENTAL PLEADINGS

JURY TRAIL REQUEST

2023 MAR -6 PM 4:55
JENNETTE W. McBRIDE
C.R. 6.5, & F.C.

RICHLAND COUNTY
FILED

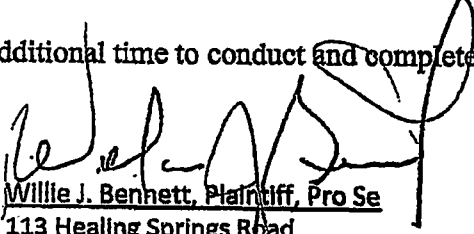
**PLAINTIFF MOTION FOR AMENDED AND
SUPPLEMENTAL PLEADINGS**

Pursuant to Rule 15(a), Motion for Amended and Supplemental Pleadings, Plaintiff ask the Court to extend the 30-day time requirement as required by SCRCF to file an Amended Pleading to his Complaint without permission of the Court.

Defendant filed her Answer to Plaintiff's Summons and Complaint on Wednesday, February 1, 2023, and postmarked Answer by United States mail Thursday, February 2, 2023. Plaintiff received Answer by United States mail Monday, February 6, 2023.

Plaintiff ask the Court for an additional 60 Days beyond the established 30 day or whatever time frame the Court deems appropriate.

The reason for this request is to allow Plaintiff additional time to conduct and complete discovery.


Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

March 6, 2023
Hopkins, South Carolina.

CERTIFICATE OF SERVICE


The undersigned certifies that a copy of the enclosed Plaintiff's Motion for Amended and Supplemental Pleadings, s have been sent to the below attorneys of records via United State Mail, postage prepaid, March 6. 2023.

PARTIES SERVED:

Collins Lacy, Attorney at Law
ATTN: Kelsey J. Brudvig
PO Box 12487
Columbia, South Carolina 29211

Sweeny, Wingate & Barrow, P.A
ATTN: Christy E Mahon
1515 Lady Street
Columbia, South Carolina 29211

RICHLAND COUNTY
FILED
2023 MAR -6 PM 4: 52
JEANETTE W. McBRIDE
C.C.P., G.S., & F.O.


Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

March 6, 2023
Hopkins, South Carolina.

EXHIBIT

C

STATE OF SOUTH CAROLINA

COUNTY OF Richland

WILLIE J. BENNETT

Plaintiff,

vs.

SAHAN N. GRAY, CLAIR H. ECHART,
AND CHICK-FIL-A, INC.

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

CASE NO.: 2023-CP-400-0017

**MOTION AND ORDER INFORMATION
FORM AND COVERSHEET**

Plaintiff's Attorney: <u>WILLIE J. BENNETT, PRO SE</u> Bar No. _____ Address: <u>113 HEATHING SPRINGS RD</u> <u>HOPKINS, SC 29061</u> Phone: _____ Fax _____ E-mail: _____ Other: _____	Defendant's Attorney: <u>COLLINS LACY</u> Bar No. _____ Address: <u>ATTN: KELSEY J. BRUDNIG</u> <u>PO BOX 12487</u> <u>1330 LADY ST</u> <u>COLUMBIA, SC 29201</u> Phone: _____ Fax _____ E-mail: _____ Other: _____
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and II) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information Nature of Motion: <u>TIME EXTENSION</u> Estimated Time Needed: <u>15 MINUTES</u> Court Reporter Needed: <input type="checkbox"/> YES / <input type="checkbox"/> NO	
SECTION II: Motion/Order Type <input type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
Signature of Attorney for <input type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant _____ Date submitted _____	
SECTION III: Motion Fee <input type="checkbox"/> PAID - AMOUNT: \$ <u>25.00</u> <input type="checkbox"/> EXEMPT: (check reason) <ul style="list-style-type: none"> <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCP) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	
JUDGE'S SECTION <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____
CLERK'S VERIFICATION Collected by: _____ Date Filed: _____ <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____	

FILED
 2023 JUN 26 PM 4:26
 CLERK OF COURT
 W. MCBRIDE
 G.S. & F.C.
 RICHLAND COUNTY

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

Willie J. Bennett,)

Plaintiff,)

vs.)

Sasha N. Gray, Claire H. Eckert, and)
Chick-Fil-A, Inc.,)

Defendants.)

IN THE COURT OF COMMON)
PLEAS)

FIFTH JUDICIAL CIRCUIT)

Civil Action No.: 2023-CP-40-00017)

PLAINTIFF FIRST REQUEST)
TO AMEND MOTION FOR)
AMENDED AND)
SUPPLEMENTAL PLEADINGS)

JURY TRIAL REQUESTED)

RICHLAND COUNTY
FILED

2023 APR 26 PM 4: 26

JEANETTE W. MCBRIDE
CLERK, G.S. & F.

**PLAINTIFF'S FIRST REQUEST TO AMEND MOTION FOR AMENDED AND
SUPPLEMENTAL PLEADINGS**

Pursuant to Rule 15(a), First Request to Amend Motion for Amended and Supplemental Pleadings, Plaintiff ask the Court to further extend the 30-day time requirement as required by SCRCF to file an Amended Pleading to his Complaint without permission of the Court.

Plaintiff ask the Court to grant an additional time frame until June 30, 2023, or a time frame designated by the Court.

The reason for this request is to allow Plaintiff additional time to conduct and complete discovery. Delays are not within Plaintiff control. External agencies are slow to respond to discovery material request.



Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

April 26, 2023

Hopkins, South Carolina.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the enclosed Plaintiff's First Request to Amend Motion for Amended and Supplemental Pleadings have been sent to the below attorneys of records via United State Mail, postage prepaid, April 26, 2023.

PARTIES SERVED:

Collins Lacy, Attorney at Law
ATTN: Kelsey J. Brudvig
PO Box 12487
Columbia, South Carolina 29211

Sweeny, Wingate & Barrow, P.A.
ATTN: Christy E Mahon
1515 Lady Street
Columbia, South Carolina 29211

2023 APR 26 PM 4: 26
JEANETTE W. McBRIDE
C.C.P., G.S., & F.C.

RICHLAND COUNTY
FILED



Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

April 26, 2023
Hopkins, South Carolina.

EXHIBIT

D

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

WILLIE J. BENNETT

Plaintiff,

vs.

SASHAN N. GRAY, CLAIRE H. ECKERT

Defendant.

IN THE COURT OF COMMON PLEAS
____ JUDICIAL CIRCUIT

CASE NO.: 2023-CP-400-0017

**MOTION AND ORDER INFORMATION
FORM AND COVERSHEET**

Plaintiff's Attorney: <u>WILLIE J. BENNETT</u> Bar No. _____ Address: <u>113 HEALING SPRINGS</u> <u>HOPKINS, SC</u> <u>29061</u> Phone: _____ Fax _____ E-mail: _____ Other: <u>(803) 319-5740</u>	Defendant's Attorney: <u>COLLIER + LACEY</u> Bar No. _____ Address: <u>ATT: KELSEY J. BRADY</u> <u>PO BOX 24407</u> <u>13313</u> Phone: _____ Fax _____ E-mail: _____ Other: _____										
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and II) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)											
SECTION I: Hearing Information Nature of Motion: <u>To Compel</u> Estimated Time Needed: <u>3 @ MINUTE</u> Court Reporter Needed: <input type="checkbox"/> YES / <input type="checkbox"/> NO											
SECTION II: Motion/Order Type <input type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order. <u>[Signature]</u> Signature of Attorney for <input type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant Date submitted: <u>23 APRIL 2023</u>											
SECTION III: Motion Fee <input type="checkbox"/> PAID - AMOUNT: \$ <u>25.00</u> <input type="checkbox"/> EXEMPT: (check reason) <table border="0"> <tr> <td><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</td> <td><input type="checkbox"/> State Agency v. Indigent Party</td> </tr> <tr> <td><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</td> <td><input type="checkbox"/> Post-Conviction Relief</td> </tr> <tr> <td><input type="checkbox"/> Indigent Status</td> <td><input type="checkbox"/> Motion for Stay in Bankruptcy</td> </tr> <tr> <td><input type="checkbox"/> Sexually Violent Predator Act</td> <td><input type="checkbox"/> Motion for Execution (Rule 69, SCRPC)</td> </tr> <tr> <td><input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions</td> <td></td> </tr> </table> Name of Court Reporter: _____ <input type="checkbox"/> Other: _____		<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> State Agency v. Indigent Party	<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Post-Conviction Relief	<input type="checkbox"/> Indigent Status	<input type="checkbox"/> Motion for Stay in Bankruptcy	<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Motion for Execution (Rule 69, SCRPC)	<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> State Agency v. Indigent Party										
<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Post-Conviction Relief										
<input type="checkbox"/> Indigent Status	<input type="checkbox"/> Motion for Stay in Bankruptcy										
<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Motion for Execution (Rule 69, SCRPC)										
<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions											
JUDGE'S SECTION <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____										
CLERK'S VERIFICATION Collected by: <u>PM</u> Date Filed: <u>4/28/23</u> <input checked="" type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____											

BRADY
 KELSEY J.
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 APR 24
 4:24 PM
 W. MCBRIDE
 S. & E.C.
 RICHLAND COUNTY
 COLUMBIA, SC

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS)

COUNTY OF RICHLAND)

FIFTH JUDICIAL CIRCUIT)

Willie J. Bennett,)

Civil Action No.: 2023-CP-40-00017)

Plaintiff,)

MOTION FOR ORDER)
COMPELLING DISCOVERY)

vs.)

Sasha N. Gray, Claire H. Eckert, and)
Chick-Fil-A, Inc.,)

Defendants)

JEANETTE W. McBRIDE
Clerk, P. G.S., & F.C.

2023 APR 28 PM 4: 24

RICHLAND COUNTY
FILED

To: Kelsey J. Brudvig, Attorney

MOTION FOR ORDER COMPELLING DISCOVERY

Pursuant to Rule 37 SCRPC, Plaintiff ask the Court for an Order Compelling Defendant's Attorney, Kelsey J. Brudvig, to produce documents and answers that were requested in Plaintiff's Interrogatories (Rule 33, exhibit, A, question 7) and Production of Document, (Rule 26, exhibit, B, question 14). Defendant failed to make or cooperate in complete discovery.

SEQUENCE OF EVENTS

1. On December 21, 2023, I received a text message from Chick-Fil-A employee Tonia Mitchell, Exhibit C, stating the name of Chick-Fil-A insurance company, Arch Insurance, policy number #31CAB1044800, and telephone number, (866) 669-4151. After talking to and giving information to the representative concerning the accident at the provided number for 20-25 minutes, the representative told me that she would not accept my claim for the automobile collision by Chick-fil-A Employee and terminated the conversation.
2. Defendant's also failed to provide to provide Plaintiff Arch Insurance Company's telephone number, address, and copy of Defendant's insurance policy. Defendant's Attorney gave me a

different insurance policy number then received from Ms. Mitchell in para 1 above. Arch Insurance policy provided by Defendant's Attorney is # 31CAB1044803 (exhibit D, question 7).

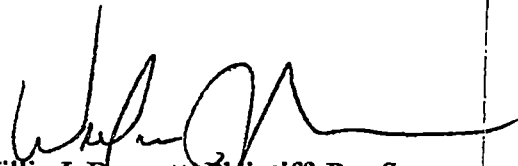
3. Defendant's letter to Plaintiff of March 24, 2023, exhibit E, Interrogatory No. 22 is noted as an incomplete answer. Defendants state that you responded "[n]o inspection has been done. Defendant refused to provide correct insurance contact and information. Defendant insurance information is not the subject of this Interrogatory and is not relevant to what has been requested from you. Again, I have requested proper information from Defendant in order to file a claim and get an estimate for repair. Each time Defendant refused to provide discovery information.

4. On April 20, 2023, I spoke with an Arch/ insurance representative, Brenda (would not give last name), at (866) 669-4151. I identified myself as Willie Bennett. Pro Se. She would not give any information, except Ms. Brudvig is the Attorney of Record and gave instruction not to assist me. She did forward my call to Jenifer Edenfield at (844) 957-5152 or 5752 who express the same language as Brenda.

5. Defendants also have coverage by Sedgwick Insurance Company which Defendant also failed to disclose or provide to Plaintiff. Plaintiff also request Defendants provide a complete copy of the Sedgwick Insurance policy to include insurance company's name, address, telephone number, and coverage.

Without Defendant's insurance coverage, discovery as required under Rule 26, I am forced to cancel my vehicle inspection and repair date of May 3, 2023, to avoid a cancellation cost and because the auto repair center will not accept vehicle repair without proper insurance

information. also, Plaintiff will amend Motion to extent Discovery in order to respond to Defendant's pending Motion and to complete his discovery.



Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

April 28, 2023
Hopkins, South Carolina.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the enclosed Plaintiff Motion for Order Compelling Discovery have been sent to the below attorneys of records via United State Mail, postage prepaid, April 25, 2023.

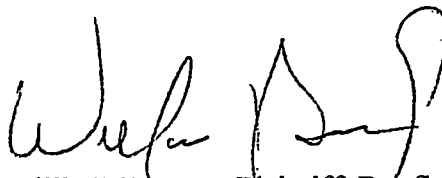
PARTIES SERVED:

Collins Lacy, Attorney at Law
ATTN: Kelsey J. Brudvig
PO Box 12487
Columbia, South Carolina 29211

Sweeny, Wingate & Barrow, P.A.
ATTN: Christy E Mahon
1515 Lady Street
Columbia, South Carolina 29211

2023 APR 28 PM 4: 25
JEANETTE W. MCBRIDE
C.C.P., G.S., & F.C.

RICHLAND COUNTY
FILED



Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

April 28, 2023
Hopkins, South Carolina.

2008) (holding tax returns are relevant to a punitive damages claim only after a plaintiff makes a prima facie showing that it is entitled to punitive damages); Blount v. Wake Elec. Membership Corp., 162 F.R.D. 102, 105 (E.D.N.C. 1993) (court deferred production of financial information until after punitive damages claims survives a motion to dismiss or for summary judgment)); S.C. Code Ann. 15-32-50 (requiring a bifurcated trial where plaintiff must prove liability and compensatory damages before the second stage on punitive damages is held); S.C. Code Ann. 15-32-50 (stating evidence relevant only to the issue of punitive damages is not admissible during the first stage of trial).

7. Provide the following documents on Claire H. Eckert's business automobile insurance company coverage for vehicle, 2019 Honda-license plate UCG972, involved in collision with Plaintiff on June 17, 2022,
- a. Name of insurance company.
 - b. Insurance company address.
 - c. Insurance company telephone number(s).

RESPONSE: Without making any representations as to coverage, the applicable policy relating to Plaintiff's claim is Arch Insurance Company, Policy No. 31CAB1044803, and Policy Period: 01/01/2022 – 12/31/2022.

8. Copy of Plaintiffs Facebook, Myspace, Instagram or other social media page, including all photographs linked to Defendants pages (i.e., posted by Defendants or tagged by someone else), wall posts (including older posts) and information which appeared on Defendants "info" page, from January 1, 2022, through present.

RESPONSE: Defendants are not in possession of the requested documents.

9. Produce complete franchise agreement between the below parties and indicate corporate affiliation or title (i.e., Inc., LLC, 20E, LLC, etc.):
- a. Chick-Fil-A, Inc and Christ Echert
 - b. Christ Echert and Claire H. Echert.
 - c. And any other parties that are associated or have interest in Christ Echert and Claire H. Echert organization.

RESPONSE: See Franchise Agreement with Chick-fil-A, Inc., 2CELLC-0029-0061 and Exhibit A to Franchise Agreement with Chick-fil-A, Inc., 2CELLC-0016-0028 and marked confidential. There is no franchise agreement between Chris Eckert and Claire H. Eckert.

Exhibit A

[No number given] State whether the Plaintiff has ever been a party to any legal action other than this action. If so, state the name of the case, the court in which the case was filed, and the nature of the legal action.

ANSWER: None.

14. Set forth the names, addresses, telephone numbers and contact persons for all insurance companies or other entities that have a subrogation interest in a prospective settlement or judgment obtained by Plaintiff.

ANSWER: Not applicable.

15. State whether Defendant, Sasha N. Gray, consumed any alcohol or any type of medication, either prescription or over the counter, Within the 24 hours immediately preceding the incident referred to in the Complaint.

ANSWER: None.

16. Set forth a list of all medications that have been prescribed to Defendant, Sasha N. Gray, for the last ten (10) years to the present and include the condition for which the medication was prescribed.

ANSWER: None.

17. Set forth the names and addresses of each and every pharmacy where Defendant, Sasha N. Gray, has or have had a prescription for any and all medications filled for the last ten (10) years to the present.

ANSWER: None.

18. Identify all property damage that Defendants sustained as a result of the June 17, 2022 vehicle incident. In Answering this Interrogatory, if the vehicle has been inspected or an

Exhibit B

Hi Mr. Bennett,

This is Tonia Mitchell with Chick-Fil-A on (Garners Ferry Road). The insurance information is Arch insurance Company. The policy number is 31CAB1044800. The phone number is 866-669-4151. Thanks again for your patience and please let me know if you need any additional assistance. Happy holidays!

The above subject matter is a cut and paste from my cell phone that was sent to me by Chick-Fil-A Employee, Toni Mitchell, December 21, 2023.

EXHIBIT C

2008) (holding tax returns are relevant to a punitive damages claim only after a plaintiff makes a prima facie showing that it is entitled to punitive damages); Blount v. Wake Elec. Membership Corp., 162 F.R.D. 102, 105 (E.D.N.C. 1993) (court deferred production of financial information until after punitive damages claims survives a motion to dismiss or for summary judgment)); S.C. Code Ann. 15-32-50 (requiring a bifurcated trial where plaintiff must prove liability and compensatory damages before the second stage on punitive damages is held); S.C. Code Ann. 15-32-50 (stating evidence relevant only to the issue of punitive damages is not admissible during the first stage of trial).

7. Provide the following documents on Claire H. Eckert's business automobile insurance company coverage for vehicle, 2019 Honda-license plate UCG972, involved in collision with Plaintiff on June 17, 2022,
- a. Name of insurance company.
 - b. Insurance company address.
 - c. Insurance company telephone number(s).

RESPONSE: Without making any representations as to coverage, the applicable policy relating to Plaintiff's claim is Arch Insurance Company, Policy No. 31CAB1044803, and Policy Period: 01/01/2022 – 12/31/2022.

8. Copy of Plaintiffs Facebook, Myspace, Instagram or other social media page, including all photographs linked to Defendants pages (i.e., posted by Defendants or tagged by someone else), wall posts (including older posts) and information which appeared on Defendants "info" page, from January 1, 2022, through present.

RESPONSE: Defendants are not in possession of the requested documents.

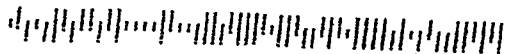
9. Produce complete franchise agreement between the below parties and indicate corporate affiliation or title (i.e., Inc., LLC, 20E, LLC, etc.):
- a. Chick-Fil-A, Inc and Christ Echert
 - b. Christ Echert and Claire H. Echert.
 - c. And any other parties that are associated or have interest in Christ Echert and Claire H. Echert organization.

RESPONSE: See Franchise Agreement with Chick-fil-A, Inc., 2CELLC-0029-0061 and Exhibit A to Franchise Agreement with Chick-fil-A, Inc., 2CELLC-0016-0028 and marked confidential. There is no franchise agreement between Chris Eckert and Claire H. Eckert.

Exhibit D

EXHIBIT

E



Collins & Lacy
ATTORNEYS AT LAW

1330 Lady Street, Sixth Floor (29201) Post Office Box 12487 | Columbia, SC 29211

Wille J. Bennett
113 Healing Springs Road
Hopkins, SC 29061

1033-148

EXHIBIT

F

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Willie J. Bennett,

Plaintiff,

v.

Sasha N. Gray, Claire H. Eckert, and
Chick-Fil-A, Inc.,

Defendants.

IN THE COURT OF COMMON PLEAS

FIFTH JUDICIAL CIRCUIT

Civil Action No.: 2023-0-40-00017

AFFIDAVIT OF

**WILLIE J. BENNETT
IN RESPONSE TO
CLAIRE H. ECKERT**

JEANETTE W. McBRIDE
C.C.P., G.S., & F.C.

2023 JUL -5 AM 9:34

RICHLAND COUNTY
FILED

PERSONALLY APPEARED BEFORE ME, the undersigned, Willie J. Bennett, who after being duly sworn, deposes and says:

1. I am over the age of eighteen (18) and am in all respects competent and qualified to make the statements contained in this Affidavit. Unless otherwise noted as being based upon information and belief, the statements below are based on my own personal knowledge.
2. Claire H. Eckert South Carolina Driver's License number is 1042444633, is the insured owner of Chick-Fil-A 2019 Honda imaged/logo dressed vehicle, South Carolina tag number UCG972 and VIN number 3HGGK5H4XKM711249 (exhibit A).
3. Evidence (exhibit A) supports the fact that Mrs. Eckert receives some forms of tangible/intangible benefits, revenues or goods and services in return from Chick-Fil-A Inc., (exhibit B) or 2CE LLC and Christ Eckert (AKA, Christopher M. Eckert) for her services in maintaining the Company (s) vehicle or vehicles.


4. As the insured person of the 2019 Honda Chick-Fil-A image/logo vehicle, Mrs. Eckert has knowledge regarding the incident that occurred at the Chick-Fil-A Restaurant, as reported by the Columbia Police Department and myself, Willie J. Bennett, on June 17, 2022 and thereafter. The incident occurred at 7424 Garners Ferry Road, Columbia, South Carolina 29209.

5. Mrs. Eckert is the just and proper Defendant in this case.

6. Class Action is stated.

7. I execute this Affidavit with the full knowledge and intent that this is a sworn statement as if testifying in a court of law. As confirmation of this acknowledgement, I have initialized this paragraph.

FURTHER, YOUR AFFIANT SAYETH NAUGHT.



Willie J. BENNETT

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 4 DAY JULY, 2023



NOTARY

NOTARY PUBLIC FOR SOUTH CAROLINA

MY COMMISSION EXPIRES: 01/15/2028


CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the enclosed Plaintiff's Affidavit of Willie J. Bennett in Response to Claire H. Eckert has been sent to the below attorneys of records via United State Mail, postage prepaid, July 4, 2023.

PARTIES SERVED:

Collins Lacy, Attorney at Law
ATTN: Kelsey J. Brudvig
PO Box 12487
Columbia, South Carolina 29211

Sweeny, Wingate & Barrow, P.A
ATTN: Christy E Mahon
1515 Lady Street
Columbia, South Carolina 29211



Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

July 4, 2023
Hopkins, South Carolina.

EXHIBIT

A

Date	Time	County	1 - Interstate 2 - US Primary 3 - SC Primary	4 - Secondary 5 - County 6 - PP	Collision Location (Rt. # / Name)	0 - Main Line 6 - Connection 2 - Alternate 7 - Business 5 - Spur	Miles:	Dir. (N) (E) (S) (W)	(In) Near City or Town of:
06-17-2022	1 8 3 5	40			576 / GARNERS FERRY RD		.01		COLUMBIA

To Vehicle Owner/Operator: **Failure to return this form to the Department of Motor Vehicles within 15 days from the date of the collision could result in the suspension of your driver license and registration privileges pursuant to South Carolina Code of Laws 56-9-351 and 56-10-530.**

HH-906846	Driver/Pedestrian's Full Name LEGALLY PARKED	HH-906847	Driver/Pedestrian's Full Name GRAY SASHA NACOE
Unit # 01	Sex []	Race []	Street 217 GUSTY LN
#Occ 1	Birth Date []	City, State, & Zip HOPKINS SC 290619583	
State SC	Driver's License #	Insurance Company: ARCH INSURANCE	
Year 2018	Body PK	Vehicle Make GMC	VIN # 3GTP1NEC6JG215178
State SC	Year 2008	License Plate # HV4007	Owner's D.L. # 4274225
Home Telephone []	Owner's Full Name BENNETT WILLIE J	Home Telephone []	Owner's Full Name ECKERT CLAIRE HOLMES
Bus. Telephone []	Street 113 HEALING SPRINGS RD	Bus. Telephone []	Street 6005 HAMPTON RIDGE RD LOT33
Contributed To Collision Yes <input type="radio"/> No <input checked="" type="radio"/>	City, State, & Zip HOPKINS SC 290619319	Contributed To Collision Yes <input type="radio"/> No <input checked="" type="radio"/>	City, State, & Zip COLUMBIA SC 292091340

Unit # 01	Sex []	Race []	Street []	Home Telephone []	Owner's Full Name []
#Occ 1	Birth Date []	City, State, & Zip []	Bus. Telephone []	Street []	
State SC	Driver's License #	Insurance Company: ARCH INSURANCE	Contributed To Collision Yes <input type="radio"/> No <input checked="" type="radio"/>	City, State, & Zip []	
Year 2018	Body PK	Vehicle Make GMC	VIN # 3GTP1NEC6JG215178	Accident Insurance Information for Unit # 02	
All Units Insurance information (to be completed by Investigating Officer)				Company Name ARCH INSURANCE	Area Code/Phone Number ()
Accident Insurance Information for Unit # 01				Agency Name	Policy Number 31CAB1044800
Company Name				Area Code/Phone Number ()	
Agency Name				Policy Number 001761223U71075	
Accident Insurance Information for Unit #				Agency Name	Policy Number
Company Name				Area Code/Phone Number ()	
Agency Name				Policy Number	

Automobile Liability Insurance Information

Notice of Requirement Accepted Signature _____ Y N Refused to Affix Signature?
 Y N Vehicle Subject to Registration in SC

To Be Completed Below or Entered at WWW.SC-ALIR.COM By Insurance Company representative. This form should not be mailed to DMV if Insurance Information has been submitted electronically

Reference to Unit #: _____ I here by affirm that to the best of my knowledge the vehicle described above was insured by the below stated insurance company on the date of the collision.

Insurance Company	Policy #:	Signature	Title
Beginning Date:	Ending Date:	Policy Holder:	NAIC# (Assigned by S.C. Dept. of Ins.)
		Bus. Telephone ()	

Notice: If liability insurance was not in effect for your vehicle involved in the collision, the Department of Motor Vehicles could suspend your driver license and registration privileges pursuant to South Carolina Code of Laws 56-9-351 and 56-10-530.

If any of the below are applicable, Disregard the above portion.				Form FR-10 Not Issued: Section 56-10-520	
Check here if a Form SR-23, Fleet policy of 25 or more vehicles is on file with the Department of Motor Vehicles covering the vehicle				No FR-10 Issued to Operator/ Owner of Unit #: _____	
Check here if a certificate of self-insurance has been issued by the Department of Motor Vehicles covering the vehicle and indicate the certificate number: SI - _____				Summons issued to:	
Check here if liability insurance was not in effect to comply with South Carolina statutory requirements				For operating or allowing the operation of an uninsured vehicle	
Signature _____ Date _____				Summons Number: _____	
Investigating Officer's Name HILL - AE				Rank PTL	
SCQA # 7825-3834		Code 4 0 0 1		Date	
Reviewer's Name				Rank	
				Internal Agency Code 220014778	

SOUTH CAROLINA DPS/OHS & DMV USE ONLY

Page # 1 of 1

SOUTH CAROLINA TRAFFIC COLLISION REPORT FORM TR-310 (Rev. 04/2016)

Of Units 02

Amended - Attach Copy of Original Report Corrected

Notified 1840

Arrived 1855

Collision Location (Rt. # / Name) 1 PP-GARNERS FERRY RD, Collision Location (Rt. # / Name) 1 PP-GARNERS FERRY RD, Collision Location (Rt. # / Name) 1 PP-GARNERS FERRY RD

Driver/Pedestrian's Full Name LEGALLY PARKED, Driver/Pedestrian's Full Name LEGALLY PARKED

Unit # 01, Sex, Race, Street, Birth Date, City, State, & Zip

Year 2018, Body PK, Vehicle Make GMC, VIN # 3GTP1NEC6JG215178

State SC, Driver's License # 104244833, Class D, Insurance Company ARCH INSURANCE

Home Telephone (803) 6756757, Owner's Full Name BENNETT WILLIE J

Contributed To Collision Yes No, City, State, & Zip HOPKINS SC 290619319

Estimated Speed 0, Speed Limit NP, CD.L. Req: Yes No, T/B S Req: Yes No, Alc/Drg Info (see back): Yes No

Unit # 02, Sex F, Race BK, Street 217 GUSTY LN, Birth Date 01-21-2002, City, State, & Zip HOPKINS SC 290619583

Year 2019, Body 2S, Vehicle Make HOND, VIN # 3HGGK6H4XKM711249

State SC, Driver's License # 104244833, Class D, Insurance Company ARCH INSURANCE

Home Telephone (803) 3276478, Owner's Full Name ECKERT CLAIRE HOLMES

Contributed To Collision Yes No, City, State, & Zip COLUMBIA SC 292091340

Estimated Speed 5, Speed Limit NP, CD.L. Req: Yes No, T/B S Req: Yes No, Alc/Drg Info (see back): Yes No

Unit 1 Dam. \$0, Unit 2 Dam. \$800, Unit 3 Dam. \$, Prop. Dam. 1 \$, Prop. Dam. 2 \$

Property Owner/Witness, Address, State Zip, Phone

Photo: Describe What Happened (Refer to Units by Number) Y N

UNIT 1 WAS LEGALLY PARKED. UNIT 2 WAS ATTEMPTING TO PARK LATERALLY ON THE LEFT OF UNIT 1. WHILE PULLING FORWARD UNIT 2'S PASSENGER SIDE FRONT BUMPER STRUCK UNIT 1'S REAR DRIVER SIDE BUMPER.

PRIVATE PROPERTY

NOTICE - THE TR-310 IS FOR STATISTICAL REPORTING PURPOSES ONLY AND IS A REFLECTION OF THE OFFICER'S BEST KNOWLEDGE, OPINION AND BELIEF COVERING THE COLLISION BUT NO WARRANT IS MADE AS TO THE FACTUAL ACCURACY THEREOF.

Investigating Officer's Name HILL - AE, Rank PTL, SCCJA # 7825-3834, Jurisdiction Code 4001, Review Date 06-17-2022, Reviewer's Name Scott Desrochers, Rank Sgt., Internal Agency Code 220014778

Business Entities Online

File, Search, and Retrieve Documents Electronically

2CE LLC

Corporate Information

Entity Id: 00541282

Entity Type: Limited Liability Company

Status: Good Standing

Domestic/Foreign: Domestic

Incorporated State: South Carolina

Important Dates

Effective Date: 12/01/2014

Expiration Date: N/A

Term End Date: N/A

Dissolved Date: N/A

Registered Agent

Agent: CHRIS ECKERT

Address: 220 HAMPTONS GRANT CT
COLUMBIA, South Carolina 29209

Official Documents On File

Filing Type	Filing Date
Organization	09/26/2014

EXHIBIT

G

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Willie J. Bennett,

Plaintiff,

v.

Sasha N. Gray, Claire H. Eckert, and
Chick-Fil-A, Inc.,

Defendants.

IN THE COURT OF COMMON PLEAS

FIFTH JUDICIAL CIRCUIT

Civil Action No.: 2023-0-40-00017

AFFIDAVIT OF

WILLIE J. BENNETT
IN RESPONSE TO
CHRISTOPHER M. ECKERT

JEANETTE W. McBRIDE
C.C.P., G.S., & F.R.

2023 JUL -5 AM 9:53

RICHLAND COUNTY
FILED

PERSONALLY APPEARED BEFORE ME, the undersigned, Willie J. Bennett, who after being duly sworn, deposes and says:

1. I am over the age of eighteen (18) and am in all respects competent and qualified to make the statements contained in this Affidavit. Unless otherwise noted as being based upon information and belief, the statements below are based on my own personal knowledge.

2. Defendants filed a Motion to Substitute Real Party in interest Pursuant to Rule 17, SCRCP and replace Defendant Claire H. Eckert with 2CE LLC.

3. As stated in supporting Affidavit, Claire H. Eckert South Carolina Driver's License number is 1042444633, is the insured owner of Chick-Fil-A 2019 Honda imaged/logo dressed vehicle, South Carolina tag number UCG972 and VIN number 3HGK5H4XKM711249 (exhibit A).

4. Evidence (exhibit A) supports the fact that Mrs. Eckert receives some forms of tangible/intangible benefits, revenues or goods and services in return from Chick-Fil-A Inc., (exhibit B) or 2CE LLC and Christ Eckert (AKA, Christopher M. Eckert) for her services in maintaining the Company (s) vehicle or vehicles.

✓

5. As the insured person of the 2019 Honda Chick-Fil-A image/logo vehicle, Mrs. Eckert has knowledge regarding the incident that occurred at the Chick-Fil-A Restaurant, as reported by the Columbia Police Department and myself, Willie J. Bennett, on June 17, 2022 and thereafter. The incident occurred at 7424 Garners Ferry Road, Columbia, South Carolina 29209.

6. Mrs. Eckert is the just and proper Defendant in this case.

7. I agree and it is fact that additional real parties in this case are 2CE LLC and Christ M. Eckert (AKA, Christopher M. Eckert) should be amended to the pleading/case. That Claire H. Eckert should remain a Defendant base on the above evidence.

8. The factual bases for cause of action is Exhibit C, Assignment and Consent to Assignment Agreement. Assignment Agreement...its assigning franchised Operator, Christopher Michael ("Assignor"), and 2CE LLC, is a limited liability company, organized under the laws of the state of South Carolina and having it principal business address a 220 Hampton Grant Court, Columbia, South Carolina 29209 ("Assignee"). Defendant Christ M. Eckert is dual rolled, both as a Franchise and 2CE LLC. To further support this factual bases, Exhibit D, page 13, para 15.1 and 15.2.

9. Provided Chick-Fil-A Inc., (CFA Inc., D) does not exercise day to day control over the business at Chick-Fil-A restaurant located a 7424 Garners Ferry Road, Columbia, South Carolina, it does benefits and share in calculation and payment fees and other operator costs and expenses (exhibit C, page 8, redacted, section 14, para 14) as a partner.

10. Claire H. Eckert is the proper Defendant and should remain as the Defendant in this case. 2CE LLC and Christ M. Eckert (AKA, Christopher M. Eckert) should be amended to the pleading/case as a proper and just Defendant.

11. Class Action is stated.

12. 7. I execute this Affidavit with the full knowledge and intent that this is a sworn statement as if testifying in a court of law. As confirmation of this acknowledgement, I have initialized this paragraph.


FURTHER, YOUR AFFIANT SAYETH NAUGHT.



Willie J. BENNETT

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 4 DAY ~~JULY~~, 2023



NOTARY
NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES: 10/15/2028


CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the enclosed Plaintiff's Affidavit of Willie J. Bennett in Response to Christopher M. Eckert has been sent to the below attorneys of records via United State Mail, postage prepaid, July 4, 2023.

PARTIES SERVED:

Collins Lacy, Attorney at Law
ATTN: Kelsey J. Brudvig
PO Box 12487
Columbia, South Carolina 29211

Sweeny, Wingate & Barrow, P.A.
ATTN: Christy E Mahon
1515 Lady Street
Columbia, South Carolina 29211


Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

July 4, 2023
Hopkins, South Carolina.

EXHIBIT

A

Date	Time	County	1 - Interstate 2 - US Primary 3 - SC Primary	4 - Secondary 5 - County 6 - PP	Collision Location (Rt. # / Name)	0 - Main Line 1 - Alternate 5 - Spur	6 - Connection	Miles: .01	Dir: S W	In: Near City or Town of: COLUMBIA
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To Vehicle Owner/Operator: **Failure to return this form to the Department of Motor Vehicles within 15 days from the date of the collision could result in the suspension of your driver license and registration privileges pursuant to South Carolina Code of Laws 56-9-351 and 56-10-530.**

HH-906846	Driver/Pedestrian's Full Name LEGALLY PARKED	HH-906847	Driver/Pedestrian's Full Name GRAY SASHA NAGOE
-----------	--	-----------	--

Unit # 01	Sex	Race	Street	Unit # 02	Sex	Race	Street
							217 GUSTY LN
#Occ 1	Birth Date	City, State, & Zip	SC	#Occ 1	Birth Date	City, State, & Zip	HOPKINS SC 290619583
State SC	Driver's License #	Insurance Company:		State SC	Driver's License #	Insurance Company:	104244893 D ARCH INSURANCE
Year 2018	Body PK	Vehicle Make GMC	VIN # 3GTP1NEC6JG215178	Year 2019	Body 2S	Vehicle Make HOND	VIN # 3HGGK5H4XKM711249
State SC	Year 2009	License Plate # HV4007	Owner's D.L. # 4274225	State SC	Year 2023	License Plate # UCG872	Owner's D.L. # UNKNOWN

Home Telephone	Owner's Full Name	Home Telephone	Owner's Full Name
	BENNETT WILLIE J		ECKERT CLAIRE HOLMES
Bus. Telephone	Street	Bus. Telephone	Street
	113 HEALING SPRINGS RD		6005 HAMPTON RIDGE RD LOT33
Contributed To Collision	City, State, & Zip	Contributed To Collision	City, State, & Zip
Yes <input type="radio"/> No <input checked="" type="radio"/>	HOPKINS SC 290619319	Yes <input checked="" type="radio"/> No <input type="radio"/>	COLUMBIA SC 292091340

Driver/Pedestrian's Full Name	State	Year	License Plate #	Owner's D.L. #	
Unit #	Sex	Race	Street	Home Telephone	Owner's Full Name
#Occ	Birth Date	City, State, & Zip	Bus. Telephone	Street	
State	Driver's License #	Insurance Company:	Contributed To Collision	City, State, & Zip	
			Yes <input type="radio"/> No <input type="radio"/>		
Year	Body	Vehicle Make	VIN #	Accident Insurance Information for Unit # 02	
				Company Name	Area Code/Phone Number
				ARCH INSURANCE	()

All Units Insurance Information (to be completed by Investigating Officer)

Company Name	Area Code/Phone Number	Company Name	Area Code/Phone Number
	()		()
Agency Name	Policy Number	Agency Name	Policy Number
	001761223U71075		31CAB1044800

Automobile Liability Insurance Information

Notice of Requirement Accepted Signature _____ Y N Refused to Affix Signature?

To Be Completed Below or Entered at WWW.SC-ALIR.COM By Insurance Company representative. This form should not be mailed to DMV if insurance information has been submitted electronically

Reference to Unit #: _____, I here by affirm that to the best of my knowledge the vehicle described above was insured by the below stated insurance company on the date of the collision.

Insurance Company	Policy #:	Signature	Title
Beginning Date:	Ending Date:	Policy Holder:	NAIC# (Assigned by S.C. Dept. of Ins.)
			Bus. Telephone ()

Notice: If liability insurance was not in effect for your vehicle involved in the collision, the Department of Motor Vehicles could suspend your driver license and registration privileges pursuant to South Carolina Code of Laws 56-9-351 and 56-10-530.

If any of the below are applicable, Disregard the above portion.				Form FR-10 Not Issued: Section 56-10-520	
<input type="checkbox"/>	Check here if a Form SR-23, Fleet policy of 25 or more vehicles is on file with the Department of Motor Vehicles covering the vehicle			No FR-10 issued to Operator/ Owner of Unit #: _____	
<input type="checkbox"/>	Check here if a certificate of self-insurance has been issued by the Department of Motor Vehicles covering the vehicle and indicate the certificate number: SI - _____			Summons issued to:	
<input type="checkbox"/>	Check here if liability insurance was not in effect to comply with South Carolina statutory requirements			For operating or allowing the operation of an uninsured vehicle	
	Signature	Date	Summons Number:		
			Signature		

Investigating Officer's Name	Rank	SCQIA #	Code	Date	Reviewer's Name	Rank	Internal Agency Code
HILL - AE	PTL	7825-3834	4 0 0 1				220014778

ORIGINAL

SOUTH CAROLINA DPS/OHS & DMV USE ONLY		Page # 1	SOUTH CAROLINA TRAFFIC COLLISION REPORT FORM TR-310 (Rev. 04/2016)		# Of Units 02	Amended - Attach Copy of Original Report Corrected	Notified 1840	Arrived 1855
---------------------------------------	--	-------------	--	--	------------------	---	------------------	-----------------

Date of Collision 8-17-2022	Time of Collision 1835	County 40	1-Interstate 2-US Primary 3-SC Primary	4-Secondary 5-County 6-Other 7-Ramp	Collision Location (Rt. # / Name) 1 PP-GARNERS FERRY RD	0-Main Line 2-Alternate 3-Spur	6-Connection 7-Business 9-Other	Miles 5	Dir. N E S W	(In) Near City or Town of: COLUMBIA
--------------------------------	---------------------------	--------------	--	--	--	--------------------------------------	---------------------------------------	------------	--------------------	--

Lane # / Dir. OF N E S W	Distance Offset Miles Feet	Direction N E S W	1-Interstate 2-US Primary 3-SC Primary	4-Secondary 5-County 6-Other 7-Ramp	Base Intersection (Rt. # / Name) 1	0-Main Line 2-Alternate 3-Spur	6-Connection 7-Business 9-Other	GPS COORDINATES 00 00 00.00 DEGREES MINUTES SECONDS
R.R. Id.	From N E S W	Ramp Only 1-Entrance 2-Exit	To N E S W	1-Interstate 2-US Primary 3-SC Primary	4-Secondary 5-County 6-Other 7-Ramp	0-Main Line 2-Alternate 3-Spur	6-Connection 7-Business 9-Other	Latitude 33 57 58.82 Longitude 80 56 38.54

Driver/Pedestrian's Full Name LEGALLY PARKED	HH-906847	Driver/Pedestrian's Full Name BRAY RASHA NACOE
---	-----------	---

Unit # 02	Sex F	Race BK	Street 217 GUSTY LN
DOB 01-21-2002	City, State, & Zip HOPKINS SC 290619583		

Year 2018	Body PK	Vehicle Make GMC	VIN # 3GTP1NEC6JG215178
State SC	Year 2019	Body 2S	Vehicle Make HOND

Home Telephone (893) 6756787	Owner's Full Name BENNETT WILLIE J	Home Telephone (803) 3276478	Owner's Full Name ECKERT CLAIRE HOLMES
Bus. Telephone ()	Street 113 HEALING SPRINGS RD	Bus. Telephone ()	Street 6008 HAMPTON RIDGE RD LOT33

Contributed To Collision Yes No	City, State, & Zip HOPKINS SC 290619319	Contributed To Collision Yes No	City, State, & Zip COLUMBIA SC 292091340
------------------------------------	--	------------------------------------	---

Estimated Speed 0	Speed Limit NP	C.D.L. Req: Yes No	T/B S Req: Yes No	Alc/Drg Info (see back): Yes No	Estimated Speed 5	Speed Limit NP	C.D.L. Req: Yes No	T/B S Req: Yes No	Alc/Drg Info (see back): Yes No
----------------------	-------------------	--------------------	-------------------	---------------------------------	----------------------	-------------------	--------------------	-------------------	---------------------------------

Unit # 01	Sex	Race	Street	Home Telephone ()	Owner's Full Name
DOB ()	City, State, & Zip		Bus. Telephone ()	Street	
State	Driver's License #	Class	Insurance Company:	Contributed To Collision Yes No	City, State, & Zip
Year	Body	Vehicle Make	VIN #	Estimated Speed	Speed Limit

Unit 1 Dam.	Unit 2 Dam.	Unit 3 Dam.	Prop. Dam. 1	Prop. Dam. 2
\$0	\$800	\$	\$	\$
Property Owner/Witness:			Property Owner/Witness:	
Address			Address	
State	Zip:	Phone	State	Zip:

Photo: Describe What Happened (Refer to Units by Number)
Y N

UNIT 1 WAS LEGALLY PARKED, UNIT 2 WAS ATTEMPTING TO PARK LATERALLY ON THE LEFT OF UNIT 1. WHILE PULLING FORWARD UNIT 2'S PASSENGER SIDE FRONT BUMPER STRUCK UNIT 1'S REAR DRIVER SIDE BUMPER.

PRIVATE PROPERTY

NOTICE: THE TR-310 IS FOR STATISTICAL REPORTING PURPOSES ONLY AND IS A REFLECTION OF THE OFFICER'S BEST KNOWLEDGE, OPINION AND BELIEF COVERING THE COLLISION BUT NO WARRANTY IS MADE AS TO THE FACTUAL ACCURACY THEREOF.

Investigating Officer's Name HILL - AE	Rank PTL	SCDJA # 7825-3834	Jurisdiction Code 4 0 0 1	Review Date 08-17-2022	Reviewer's Name Scott Desrochers	Rank Sgt.	Internal Agency Code 220014778
---	-------------	----------------------	------------------------------	---------------------------	-------------------------------------	--------------	-----------------------------------

HR#	Date of Birth	Sex	Race	Injury	Seat	R/S	A.B.D.	Eject	LAI	Tran	Name	Street Address	Zip Code
1					89						LEGALLY		
2	01-21-2002	F	BK	0	01	13	4	1	1	2	GRAY SASHA NAGOE	217 GUSTY LN HUNTING	33

Race		AP-Asian/Pacific Islander		W-White (Caucasian)		a) Injury Status		2- Suspected Minor Injury		Seating Loc.		20- Pedestrian		60- Sleeper of Cab		Restraint/Safety Device					
A1- Alaskan Native or American Indian		MR- Multi-Racial		1- Not Ejected		0- No Apparent Injury		3- Suspected Serious Injury		01 02 03		30- Trailing Unit		70- Riding on Unit Exterior		00- None Used		21- Child Safety Seat			
B- Black (African American)		H- Hispanic		2- Part Ejected		1- Possible Injury		4- Fatal		04 05 08		40- Bus or Van (4th row or Higher)		80- Lap		11- Shoulder belt		68- Other			
C- Other		U- Unknown		3- Tot. Ejected		b) 2 or 3 Wheel Motorized Vehicle Only				07 08 09		60- Other Enclosed Area (controlling)		99- Unk./NA		18- Lap Belt Only		00- Unknown			
Air Bag Deployment / Switch				Ejection				Location After Impact				a) Transported to Medical Facility				Pedestrian, Motor/Pedalcycle Only					
1- Deployed Front		4- Not Deployed		1- Not Ejected		2- Part Ejected		1- Not Trapped		3- Freed (non-mech.)		1- Yes		2- No		3- Unknown		31- Helmet		61- Reflective Clothing	
2- Deployed Side		7- Not Applicable		2- Not Apparent		3- Tot. Ejected		4- Not Applicable		1- Yes		2- No		3- Unknown		41- Protective Pads		61- Lighting			
3- Deployed Both		8- Deployment Unk.		3- Not Apparent		3- Tot. Ejected															
1- Switch in On Position		3- no action		1- Not Apparent																	
2- Switch in Off Position		9- Unknown		9- Unknown																	

Non-Collision		04- Equipment Failure		08- Overturn/Rollover		Collision: Not Fixed		27- Pedestrian		Collision: Fixed Object		47- Embankment		55- Mail Box		68- Other	
01- Cargo/Equip Loss or Shift		05- Fire/Explosion		09- Ran off Road Left		20- Animal (Deer Only)		28- Railway Veh.		40- Bridge Overhead Structure		48- Equipment		56- Median Barrier		69- Unknown	
02- Cross Median/Center		06- Immersion		10- Ran off Road Right		21- Animal (All Other)		29- Work Zone Maint. Equip.		41- Bridge Parapet End		49- Fence		57- Overhead Sign Support			
03- Downhill Runaway		07- Jackknife		11- Separation of Unit		22- Motor Veh. (In Transport)		38- Other Movable Object		42- Bridge Pier or Abutment		50- Guardrail End		58- Other (Post, Pole, Support, Etc.)			
Event 1		Event 2		Event 3		Event 4		Event 5		43- Bridge Rail		51- Guardrail Face		59- Other (Wall, Building, Tunnel, Etc.)			
Event 6		Event 7		Event 8		Event 9		Event 10		44- Culvert		52- Highway Traffic Sign Post		60- Tree			
Event 11		Event 12		Event 13		Event 14		Event 15		45- Curb		53- Impact Attenuator/Crash Cushion		61- Utility Pole			
Event 16		Event 17		Event 18		Event 19		Event 20		46- Ditch		54- Light/Luminaires Support		62- Work Zone Maint. Equipment			
Event 21		Event 22		Event 23		Event 24		Event 25		49- Ditch		55- Impact Attenuator/Crash Cushion		63- Work Zone Maint. Equipment			
Event 26		Event 27		Event 28		Event 29		Event 30		49- Ditch		55- Impact Attenuator/Crash Cushion		63- Work Zone Maint. Equipment			

Manner of Collision (Struck Veh.)		SU- Head-to-Head		SU- Side-sweep Same Dir.		Deformed Area		1- Deformed		2- Deformed		3- Deformed		4- Deformed		5- Deformed		6- Deformed		7- Deformed		8- Deformed		9- Deformed		10- Deformed		11- Deformed		12- Deformed		13- Deformed		14- Deformed		15- Deformed		16- Deformed		17- Deformed		18- Deformed		19- Deformed		20- Deformed		21- Deformed		22- Deformed		23- Deformed		24- Deformed		25- Deformed		26- Deformed		27- Deformed		28- Deformed		29- Deformed		30- Deformed		31- Deformed		32- Deformed		33- Deformed		34- Deformed		35- Deformed		36- Deformed		37- Deformed		38- Deformed		39- Deformed		40- Deformed		41- Deformed		42- Deformed		43- Deformed		44- Deformed		45- Deformed		46- Deformed		47- Deformed		48- Deformed		49- Deformed		50- Deformed		51- Deformed		52- Deformed		53- Deformed		54- Deformed		55- Deformed		56- Deformed		57- Deformed		58- Deformed		59- Deformed		60- Deformed		61- Deformed		62- Deformed		63- Deformed		64- Deformed		65- Deformed		66- Deformed		67- Deformed		68- Deformed		69- Deformed		70- Deformed		71- Deformed		72- Deformed		73- Deformed		74- Deformed		75- Deformed		76- Deformed		77- Deformed		78- Deformed		79- Deformed		80- Deformed		81- Deformed		82- Deformed		83- Deformed		84- Deformed		85- Deformed		86- Deformed		87- Deformed		88- Deformed		89- Deformed		90- Deformed		91- Deformed		92- Deformed		93- Deformed		94- Deformed		95- Deformed		96- Deformed		97- Deformed		98- Deformed		99- Deformed		100- Deformed	
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Vehicle Type		10- Full Size Van		27- Pedalcycle		61- School Bus		21- Pedestrian		81- None		92- Rollover		93- Total		94- Under Carriage		98- Other		99- Unknown	
01- Automobile		16- Mini Van		38- Animal Drawn Veh.		62- Passenger Bus		A1		B1		C1		D1		E1		F1		G1	
12- Pickup Truck		17- Sport Utility		89- Animal (Hidden)		88- Other		A2		B2		C2		D2		E2		F2		G2	
18- Truck Tractor		25- Motorcycle		41- Pedestrian		99- Unk. (Hit and Run Only)		A3		B3		C3		D3		E3		F3		G3	
14- Other Truck		28- Other Motorbike		51- Train				A4		B4		C4		D4		E4		F4		G4	
Vehicle Use Code		04- Ambulance		08- Farm Use		12- Fire Fighting		A5		B5		C5		D5		E5		F5		G5	
U1- Personal		U2- Military		U3- Volunteer or Tutor		U4- Working		A6		B6		C6		D6		E6		F6		G6	
02- Driver Training		06- Transport Passengers		10- Police		18- Other		A7		B7		C7		D7		E7		F7		G7	
03- Construction/Maint.		07- Transport Property		11- Government		41- Pedestrian		A8		B8		C8		D8		E8		F8		G8	

Vehicle Attachment		4- Utility Trailer		8- Towed Motor Vehicle		C- Other Tanker		A10 Test Results		1- Two-way, Not Divided		3- Two-way, Divided, Barrier		Trafficway	
1- None		5- Farm Trailer		9- Petroleum Tanker		D- Flat Bed		A2		2- Two-way, Divided, Unprotected Median		4- One-Way		6- Other	
2- Mobile Home		6- Trailer w/Boat		A- Lowboy Trailer		E- Train Trailers		A3		1- One-way, Divided, Protected Median		5- One-Way, Divided, Unprotected Median		7- Other	
3- Semi-Trailer		7- Camper Trailer		B- Autocarrier Trailer		F- Other		A4		2- One-way, Divided, Protected Median		6- One-Way, Divided, Unprotected Median		8- Other	
Action Prior to Impact (Vehicle)		01- Backing		06- Parked		21- Approaching/Leaving Vehicle		A5		3- One-way, Divided, Protected Median		7- One-Way, Divided, Unprotected Median		9- Other	
02- Changing lanes		08- Slowing or Stopped in traffic		22- Entering/Crossing Location		23- Playing/Working on Vehicle		A6		4- One-way, Divided, Protected Median		8- One-Way, Divided, Unprotected Median		10- Other	
03- Entering traffic lane		10- Turning left		23- Pushing Vehicle		25- Standing		A7		5- One-way, Divided, Protected Median		9- One-Way, Divided, Unprotected Median		11- Other	
04- Leaving traffic lane		11- Turning right		25- Walking, Playing, Cycling		27- Working		A8		6- One-way, Divided, Protected Median		10- One-Way, Divided, Unprotected Median		12- Other	
05- Making U-turn		06- Movement Essentially Straight Ahead		27- Working				A9		7- One-way, Divided, Protected Median		11- One-Way, Divided, Unprotected Median		13- Other	
06- Movement Essentially Straight Ahead		07- Overtaking/passing		88- Other		99- Unknown		A10		8- One-way, Divided, Protected Median		12- One-Way, Divided, Unprotected Median		14- Other	
07- Overtaking/passing		88- Other		99- Unknown		27- Working				9- One-way, Divided, Protected Median		13- One-Way, Divided, Unprotected Median		15- Other	

Weather Condition		3- Cloudy		8- Fog, Smog, Smoke		8- Unknown		1- Stop and Go Light		21- Officer or Flagman		48- Yield Sign		81- Flashing Beacon	
1- Clear (no adverse conditions)		4- Sleet, Hail		7- Blowing Sand, Oil, Dirt or Snow		8- Severe Crosswinds		02- Flashing Traffic Signal		22- Oncoming Emergency Vehicle		31- Pavement Markings (only)		44- Work Zone	
2- Rain		5- Snow		8- Severe Crosswinds				11- RR (X-bucks, Lights & Gate)		31- Pavement Markings (only)		41- Stop Sign		88- None	
								12- RR (X-bucks & Lights)		41- Stop Sign		48- Other Warning Signs		99- Unk.	
								13- RR (X-bucks Only)		42- School Zone Sign		48- Other Warning Signs		99- Unk.	
								1- Yes, Directly		2- Yes, Indirectly		3- No		6- Unknown	
								1- Before 1st Sign		2- Traffic Area		3- Transition Area		4- Yes	
								2- Advanced Warning Area		3- Activity Area		4- Transition Area		1- Yes	
								1- Shoulder/Median Work		3- Intermittent/Moving Work		6- Other		1- Yes	
								2- Lane Shift/Crossover		4- Lane Closure		9- Unk.		2- No	

Light Condition		3- Dusk		6- Dark (Street Lamp Not Lit)		Junction Type		03- Five/More Points		07- Shared Use Paths or Trails		12- Y-Intersection	
1- Daylight		4- Dark (Lighting Unspecified)		7- Dark (No lights)		01- Crossover		04- Four-way Intersection		08- T-Intersection		15- Nonjunction	
2- Dawn		5- Dark (Street Lamp 1.0)				02- Driveway		05- Railway Grade Crossing		09- Traffic Circle		88- Unknown	
						Primary		06- Contributing Factors		12- Aggressive Operation of Vehicle		Roadway	
						Contributing Factors		01- Disregarded Signs, Signal, Etc.		13- Over-overtaking/Over-driving		30- Dribble	
						Driver		02- Distracted/Inattention		14- Swerving to Avoid Object		81- Non-highway Work	
						Contributing Factors		03- Driving Too Fast for Conditions		15- Wrong Side or Wrong Way		82- Obstruction in Roadway	
						Contributing Factors		04- Exceeded Authorized Speed Limit		16- Under the Influence		83- Road Surface Condition (i.e. Wet)	
						Contributing Factors		05- Ran off Road		17- Vision Obscured (Within Unit)		34- Ruts, Holes, Bumps	
						Contributing Factors		06- Fatigued/Asleep		18- On Cell Phone		35- Traffic Control Device (i.e. Missing)	
						Contributing Factors		07- Followed Too Closely		19- Other Improper Action		36- Work Zone (Const./Maint./Utility)	
						Contributing Factors		08- Made an Improper Turn		20- Unk.		37- Work Zone (Const./Maint./Utility)	
						Contributing Factors		09- Medical Related		25- Other Improper Action		38- Worn, Travel-Polished Surface	
						Contributing Factors		10- Medical Related		28- Unk.		48- Other	
						Contributing Factors		11- Medical Related		29- Unk.		49- Unknown	
						Contributing Factors		12- Medical Related		30- Unk.		51- Lying &/or Misguy in Roadway	
						Contributing Factors		13- Medical Related		31- Unk.		52- Failure to Yield Right of Way	
						Contributing Factors		14- Medical Related		32- Unk.		53- Not Visible (Dark Clothing)	
						Contributing Factors		15- Medical Related		33- Unk.		54- Disregard Signs, Signals, Etc.	
						Contributing Factors		16- Medical Related		34- Unk.		55- Disregard Signs, Signals, Etc.	
						Contributing Factors		17- Medical Related		35- Unk.		56- Darting	
						Contributing Factors		18- Medical Related		36- Unk.		57- Wrong Side of Road	
						Contributing Factors		19- Medical Related		37- Unk.		58- Under the Infl.	
						Contributing Factors		20- Medical Related		38- Unk.		59- Other	
						Contributing Factors		21- Medical Related		39- Unk.		60- Other	
						Contributing Factors		22- Medical Related		40- Unk.		61- Other	
						Contributing Factors		23- Medical Related		41- Unk.		62- Other	
						Contributing Factors		24- Medical Related		42- Unk.		63- Other	
						Contributing Factors		25- Medical Related		43- Unk.		64- Other	
						Contributing Factors		26- Medical Related		44- Unk.		65- Other	
						Contributing Factors		27- Medical Related		45- Unk.		66- Other	
						Contributing Factors		28- Medical Related		46- Unk.		67- Other	
						Contributing Factors		29- Medical Related		47- Unk.		68- Other	
						Contributing Factors		30- Medical Related		48- Unk.		69- Other	
						Contributing Factors		31- Medical Related		49- Unk.		70- Other	
						Contributing Factors		32- Medical Related		50- Unk.		71- Other	
						Contributing Factors		33- Medical Related		51- Unk.		72- Other	
						Contributing Factors		34- Medical Related		52- Unk.		73- Other	
						Contributing Factors		35- Medical Related		53- Unk.		74- Other	
						Contributing Factors		36- Medical Related		54- Unk.		75- Other	
						Contributing Factors		37- Medical Related		55- Unk.		76- Other	
						Contributing Factors		38- Medical Related		56- Unk.		77- Other	
						Contributing Factors		39- Medical Related		57- Unk.		78- Other	
						Contributing Factors		40- Medical Related		58- Unk.		79- Other	

EXHIBIT

B

Business Entities Online

File, Search, and Retrieve Documents Electronically

2CE LLC

Corporate Information

Entity Id: 00541282

Entity Type: Limited Liability Company

Status: Good Standing

Domestic/Foreign: Domestic

Incorporated State: South Carolina

Important Dates

Effective Date: 12/01/2014

Expiration Date: N/A

Term End Date: N/A

Dissuived Date: N/A

Registered Agent

Agent: CHRIS ECKERT

Address: 220 HAMILTONS GRANT CT
COLUMBIA, South Carolina 29209

Official Documents On File

Filing Type	Filing Date
Organization	09/26/2014

For filing questions please contact us at 803-734-2158

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EXHIBIT

C

EXHIBIT

D

EXHIBIT

H

Date	Time	County	1 - Interstate 2 - US Primary 3 - SC Primary	4 - Secondary 5 - County 6 - PP	Collision Location (Rt. # / Name)	① Main Line 6 - Connection 2 - Alternate 7 - Business 5 - Spur	Miles:	Dir:	② Near City or Town of:
06-17-2022	1 8 3 5	40			76 / GARNERS FERRY RD		.01	NE SW	COLUMBIA

To Vehicle Owner/Operator: **Failure to return this form to the Department of Motor Vehicles within 15 days from the date of the collision could result in the suspension of your driver license and registration privileges pursuant to South Carolina Code of Laws 56-9-351 and 56-10-530.**

HH-906846	Driver/Pedestrian's Full Name LEGALLY PARKED	HH-906847	Driver/Pedestrian's Full Name GRAY SASHA NACOE
Unit # 01	Sex Race Street	Unit # 02	Sex Race Street
#Occ 1	Birth Date City, State, & Zip SC	#Occ 1	Birth Date City, State, & Zip HOPKINS SC 290619583
State SC	Driver's License # Insurance Company:	State SC	Driver's License # Insurance Company:
Year 2018	Body Vehicle Make VIN #	Year 2019	Body Vehicle Make VIN #
State SC	Year License Plate # Owner's D.L. #	State SC	Year License Plate # Owner's D.L. #
Home Telephone	Owner's Full Name BENNETT WILLIE J	Home Telephone	Owner's Full Name ECKERT CLAIRE HOLMES
Bus. Telephone	Street 113 HEALING SPRINGS RD	Bus. Telephone	Street 6005 HAMPTON RIDGE RD LOT33
Contributed To Collision Yes <input type="radio"/> No <input checked="" type="radio"/>	City, State, & Zip HOPKINS SC 290619319	Contributed To Collision Yes <input type="radio"/> No <input checked="" type="radio"/>	City, State, & Zip COLUMBIA SC 292091340

Unit # 01	Sex Race Street	Home Telephone	Owner's Full Name
#Occ 1	Birth Date City, State, & Zip	Bus. Telephone	Street
State SC	Driver's License # Insurance Company:	Contributed To Collision Yes <input type="radio"/> No <input checked="" type="radio"/>	City, State, & Zip
Year 2018	Body Vehicle Make VIN #	Accident Insurance Information for Unit # 02	
All Units Insurance Information (to be completed by Investigating Officer)		Company Name ARCH INSURANCE	Area Code/Phone Number ()
Accident Insurance Information for Unit # 01		Agency Name	Policy Number 31CAB1044800
Company Name	Area Code/Phone Number ()	Company Name	Area Code/Phone Number ()
Agency Name	Policy Number 001761223U71075	Agency Name	Policy Number

Automobile Liability Insurance Information

Notice of Requirement Accepted Signature _____ Y N Refused to Affix Signature?
Y N Vehicle Subject to Registration in SC?

To Be Completed Below or Entered at WWW.SC-ALIR.COM By Insurance Company representative. This form should not be mailed to DMV if Insurance information has been submitted electronically

Reference to Unit #: _____, I hereby affirm that to the best of my knowledge the vehicle described above was insured by the below stated Insurance company on the date of the collision.

Insurance Company	Policy #:	Signature	Title
Beginning Date:	Ending Date:	Policy Holder:	NAIC# (Assigned by S.C. Dept. of Ins.)
		Bus. Telephone ()	

Notice: If liability insurance was not in effect for your vehicle involved in the collision, the Department of Motor Vehicles could suspend your driver license and registration privileges pursuant to South Carolina Code of Laws 56-9-351 and 56-10-530.

If any of the below are applicable, Disregard the above portion.

<input type="checkbox"/> Check here if a Form SR-23, Fleet policy of 25 or more vehicles is on file with the Department of Motor Vehicles covering the vehicle <input type="checkbox"/> Check here if a certificate of self-insurance has been issued by the Department of Motor Vehicles covering the vehicle and indicate the certificate number: SI - _____ <input type="checkbox"/> Check here if liability Insurance was not in effect to comply with South Carolina statutory requirements	Form FR-10 Not Issued: _____ Section 56-10-520 No FR-10 Issued to Operator/ Owner of Unit #: _____ Summons Issued to: _____ For operating or allowing the operation of an uninsured vehicle Summons Number: _____ Signature _____ Date _____						
Investigating Officer's Name HILL - AE	Rank PTL	SCCJA # 7825-3834	Code 4 0 0 1	Date	Reviewer's Name	Rank	Internal Agency Code 220014778

ORIGINAL

SOUTH CAROLINA DPS/OHS & DMV USE ONLY

Page #

1

SOUTH CAROLINA TRAFFIC COLLISION REPORT FORM

TR-310 (Rev. 04/2016)

Of Units 02

Amended - Attach Copy of Original Report Corrected

Notified 1840

Arrived 1855

Date: 06-17-2022, Time of Collision: 1835, County: 40, Collision Location: PP-GARNERS FERRY RD, City: COLUMBIA

Distance Offset, Direction, Base Intersection, Second Intersection, GPS COORDINATES: 33 57 58.82

HH-906846 Driver: LEGALLY PARKED, HH-906847 Driver: GRAY SASHA NACOE

Unit #, Sex, Race, Street, Birth Date, City, State, & Zip

State, Driver's License #, Class, Insurance Company

Year, Body, Vehicle Make, VIN #

State, Year, License Plate #, Owner's D.L. #

Home Telephone, Owner's Full Name

Bus. Telephone, Street

Contributed To Collision, City, State, & Zip

Estimated Speed, Speed Limit, C.D.L. Req, T/B S Req, Alc/Drg info

State, Year, License Plate #, Owner's D.L. #

Home Telephone, Owner's Full Name

Bus. Telephone, Street

Contributed To Collision, City, State, & Zip

Estimated Speed, Speed Limit, C.D.L. Req, T/B S Req, Alc/Drg info

Dir. of Travel: Unit 1: N S E W, Unit 2: N S E W, Unit 3: N S E W

Unit 1 Dam., Unit 2 Dam., Unit 3 Dam., Prop. Dam. 1, Prop. Dam. 2

Property Owner/Witness, Address

State, Zip, Phone

Photo: Describe What Happened (Refer to Units by Number)

UNIT 1 WAS LEGALLY PARKED. UNIT 2 WAS ATTEMPTING TO PARK LATERALLY ON THE LEFT OF UNIT 1. WHILE PULLING FORWARD UNIT 2'S PASSENGER SIDE FRONT BUMPER STRUCK UNIT 1'S REAR DRIVER SIDE BUMPER.

PRIVATE PROPERTY

NOTICE - THE TR-310 IS FOR STATISTICAL REPORTING PURPOSES ONLY AND IS A REFLECTION OF THE OFFICER'S BEST KNOWLEDGE, OPINION AND BELIEF COVERING THE COLLISION BUT NO WARRANT IS MADE AS TO THE FACTUAL ACCURACY THEREOF.

Investigating Officer's Name: HILL - AE, Rank: PTL, SCCJA #: 7825-3834, Jurisdiction Code: 4 0 0 1, Review Date: 06-17-2022, Reviewer's Name: Scott Desrochers, Rank: Sgt., Internal Agency Code: 220014778

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Appellant case No. 2023-001295

Richland County Court Case No. 2023-CP-40-00017

RECEIVED

SEP 18 2023

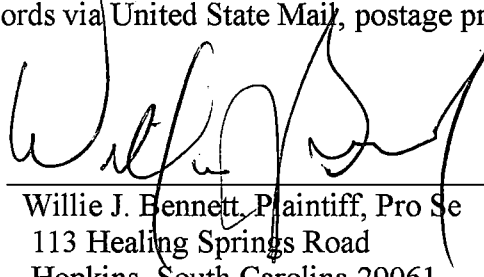
SC Court of Appeals

Willie J. Bennett.....Appellant,

Sasha N. Gray, Claire H. Eckert,
and Chick-Fil-a, Inc..... Respondent.

PROOF OF SERVICE

The undersigned certifies that a copy of the enclosed Appellant's Second Motion to Stay of Appeal have sent to the below attorneys of records via United State Mail, postage prepaid, September 18, 2023.


Willie J. Bennett, Plaintiff, Pro Se
113 Healing Springs Road
Hopkins, South Carolina 29061
(803) 319-5740 Cell

September 18, 2023
Hopkins, South Carolina.

Other Counsels of Record:

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Sweeny, Wingate & Barrow, P.A.
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Collins Lacy, Attorney at Law
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