

RECEIVED

Jan 16 2025

SC Court of Appeals

Plaintiff's Notice of Appeal

STATE OF SOUTH CAROLINA  
COUNTY OF ORANGEBURG  
IN THE COURT OF COMMON PLEAS  
FIRST JUDICIAL CIRCUIT

Case No.: 2023-CP-38-00331

Serge R. Wandji, Plaintiff,

v.

The Regional Medical Center, Defendant.

NOTICE OF APPEAL

**TO: THE CLERK OF THE STATE OF SOUTH CAROLINA  
COUNTY OF ORANGEBURG IN THE COURT OF COMMON PLEAS  
FIRST JUDICIAL CIRCUIT, AND THE REGIONAL MEDICAL CENTER,  
DEFENDANT:**

PLEASE TAKE NOTICE that the Plaintiff, **Serge R. Wandji**, Pro Se, hereby appeals to the **South Carolina Court of Appeals** from the decision granting Defendant's Motion for Summary Judgment. The Plaintiff was notified via email on **December 16, 2024**, by the Law Clerk of the Honorable Maite Murphy that the Defendant's Motion for Summary Judgment had been granted. However, as of the date of this Notice, the Plaintiff has not received a written order prepared and signed by the Judge memorializing this decision.

The Plaintiff contends that the Court erred in granting the Defendant's Motion for Summary Judgment on the Plaintiff's workers' compensation retaliation claim. The grounds for this appeal include, but are not limited to, the following:

1. **Errors in Findings of Fact:** The trial court improperly concluded that there were no genuine issues of material fact regarding the Plaintiff's claim of workers' compensation retaliation. The Plaintiff contends that sufficient evidence was presented to demonstrate a causal connection between the filing of his workers' compensation claim and his termination.
2. **Errors in Application of Law:** The trial court misapplied South Carolina Code § 41-1-80 and relevant case law, failing to fully consider evidence suggesting pretext in the Defendant's justification for the Plaintiff's termination.
3. **Failure to Consider Temporal Proximity and Retaliatory Motive:** The Court dismissed the temporal proximity between the Plaintiff's workers' compensation claim and his termination without adequately considering it as evidence of retaliatory intent.
4. **Improper Weighing of Evidence:** The Court improperly weighed evidence favorable to the Defendant and failed to construe all inferences in the light most favorable to the Plaintiff, as required under Rule 56, SCRPC.

**RECEIVED**

**Jan 16 2025**

**SC Court of Appeals**

This appeal is brought pursuant to Rule 203(b)(1) of the South Carolina Appellate Court Rules (SCACR).

## **RELIEF SOUGHT**

The Plaintiff respectfully requests that the South Carolina Court of Appeals reverse the decision granting Defendant's Motion for Summary Judgment and remand the case for trial on the merit

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this **Notice of Appeal** on the Defendant's counsel, **Amanda C. Williams, Esq.**, via U.S. Mail and email, on this 11<sup>th</sup> day of **January 2025**, to her address as shown below.

Amanda C. Williams  
PARKER POE ADAMS & BERNSTEIN LLP  
850 Morrison Drive, Suite 400  
Charleston, SC 29403  
amandawilliams@parkerpoe.com  
ATTORNEY FOR DEFENDANT

Respectfully submitted,

---

**s/Serge R. Wandji**

Pro Se Plaintiff

579 Folly Road, PO Box 12112

Charleston, SC 29422

Email: [sergewandji@gmail.com](mailto:sergewandji@gmail.com)

Phone: 678-612-9649

Dated: January 11, 2025

**RECEIVED**

**Jan 16 2025**

**SC Court of Appeals**

**Serge Wandji**

579 Folly Road, PO Box 12112  
Charleston, SC 29422  
Email: sergewandji@gmail.com  
Phone: 678-612-9649

**January 11, 2025**

**Clerk of the South Carolina Court of Appeals**

1220 Senate Street  
Columbia, SC 29201

**Re: Appeal in Serge R. Wandji v. The Regional Medical Center**

Case No.: 2023-CP-38-00331

Dear Clerk,

Please find enclosed a copy of the Plaintiff's Notice of Appeal in the above-referenced matter. This appeal is being filed pursuant to Rule 203(b)(1) of the South Carolina Appellate Court Rules (SCACR).

The Plaintiff, acting pro se, appeals the decision of the Orangeburg County Court of Common Pleas granting Defendant's Motion for Summary Judgment. As noted in the Notice of Appeal, the Plaintiff has not yet received a written and signed order memorializing this decision.

Additionally, I have enclosed a check in the amount of **\$250** to cover the required appeal court filing fee.

I kindly request that you file this Notice of Appeal and provide confirmation of receipt. Should any additional documents or information be required to process this appeal, please do not hesitate to contact me at the details listed above.

Thank you for your attention to this matter.

Respectfully,  
Serge R. Wandji  
Pro Se Plaintiff

**Enclosures:**

1. Notice of Appeal
2. \$250 Check for Appeal Court Fees