

February 16, 2025

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SC Court of Appeals

South Carolina Court of Appeals
P.O Box 11629
Columbia, SC 29211

Re: Takara L. Stewart v. SC CVS Pharmacy, LLC
Claim No. 302045514320001
Appellate Case No. 2023-001264
W.C.C File No. 1923480

The SC Court Of Appeals - Clerk of Court,

In efforts to sway and or demand the Commissioned Panel to remand this case, Ms. Yarbrough has purported another frivolous dismissal attempt to bear out her indefensible defense. A Worker Compensation Order previously awarded¹ as compensatory is being subjected to biased litigation. This is an appeal to warrant justice, not an attempt for a lawyer to bully a Pro Se – workplace victim of sexual assault in the third degree inaccurately deeming her as a highly revered defense attorney. There is no defense hence the current status of the aforementioned Appellate case. This is bigger than a lawyer's retainer fee. This is the United States justice system, this is the rights of an American citizen, this is women's rights and suffrage, this is contradiction of a renowned, huge Corporation's foundational values and last but certainly not least this is the tenacious continuum of the United States Constitution solidarity for which the representation has been poorly inconsistent.

Yes as it stands, we've survived COVID – 19; five years and almost two months later Ms. Yarbrough still has absolutely no defense yet I have had to relive this third degree sexual assault as it lives rent free in my head (emphasis added). Ms. Yarbrough colluded with previous representation on this case and yet this case only resulted in a plethora of frivolous, oppressive attempts to defensively dismiss her way out of justice being served. Ms. Yarbrough's duplicitous claims are just a shameful way to overthrow the judicial system and satisfy the services she has been contracted for. The January 14, 2025 Order has been satisfied. The efforts to sustain this indefensible defense is preposterous. I am not sure what and where the disconnect is but it seems as though Ms. Yarbrough dramatically and desperately needs to have the case dismissed as this is her only defense.

¹June 3, 2021; Single Commissioner Hearing for W.C.C. File No. 1923480 held in Hartsville, South Carolina. Filed January 19, 2023

By Order of the South Carolina Court of Appeals dated January 14, 2025 I, Appellant, Takara Stewart (1) served and filed an amended Record on Appeal (“ROA”) by January 29, 2025 with the persistent tech issue experienced illustrated and (2) ensured the amended ROA complied with Rule 210 of the South Carolina Appellate Court Rules. To place an emphasis on “*Failure to comply will result in dismissal*” is the defendants’ defense. Again this case has resulted from Takara L Stewart vs SC CVS Pharmacy, LLC to an Esquire vs Pro Se Litigation. I was not present for the Appeal to reverse the Single Commissioners ruling as I was told I didn’t need to be there. This was and or is the defendants’ motive; this case needs to heard and tried. It’s all too easy to fight for a dismissal rather than prove to a jury what occurred on the only substantiated, surveillance evidence (Defendants Exhibits G). This workplace sexual assault happened, without a doubt or a contradiction and I am the victim who sustained this painfully inhumane, gross negligence by way of CVS employment.

The Designation of Matter that substantiates my arguments was struck down in efforts to leverage defense per Pro Se litigation. What is defense to sexual assault in the third degree surveillance (Defendants Exhibit G)? I removed all the matter that wasn’t designated as ordered. That was one of Ms. Yarbrough’s argument (emphasis added). The removal wasn’t enough, Ms. Yarbrough dramatically sends a letter to the Clerk of Courts demanding the case be dismissed. I made reference to the defendants’ Designation of Matter; everything that was included in the December 9, 2024 Order which was Ms. Yarbrough’s second argument (emphasis added). What more do you want (emphasis added)? Ms. Yarbrough wants the case dismissed as she has no defense as it pertains to justice and the impending liability of her client(s) hence the dubious and frivolous efforts of petitioning for dismissal(s). Ms. Yarbrough is cumulatively perplexed by her fleeting defense narration that yielded a reversed order and seems to be overwhelmed with justice actually being heard, tried and rendered on the basis of the truth.

We are at the brink of a workplace sexual assault (Takara Stewart vs CVS Pharmacy, LLC) being heard, tried and concluded whereas the defendants’ ***only*** defense is to dismiss. The compendiums of Initial Briefs, Designation of Matters and Appellants Final Brief conclusively and prospectively pursuant to South Carolina Court Rules 209, 210 herein complies on behalf of the following:

➤ **Time to Serve and File**

Ordered, satisfied and approved.

➤ **Content**

Ordered, satisfied and approved.

➤ **Exhibits**

Ordered, satisfied and approved.

Photographs, plats and diagrams, and other paper exhibits shall be inserted in the Record on Appeal where they can reasonably be reduced or drawn to a size which permits them to be printed and inserted in the Record on Appeal, without folding more than one time.

*exhibits presented during trial that are **necessary to understand the arguments** being made on appeal.*

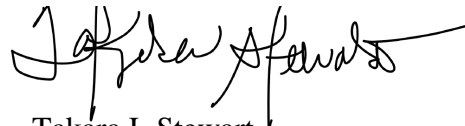
➤ **Certification**

Ordered, satisfied and approved.

*The Designation shall be signed. The signature constitutes a certificate that the Designation contains **no matter designated which is irrelevant to the appeal.***

The defendants' efforts are exemplary of unsupported defense narration and indefensible defense. I implore the South Carolina Court of Appeals to not uphold the schematic dismissal attempts of the defendants. There are numerous justices at stake for which there is a definite - sexual assault in the third degree - liability that I, Pro Se Appellant, have been subjected to by way of employment with the South Carolina CVS, LLC. The validity of Defendants Exhibit G is in question. The defendants agenda requires a cross examination of the effects of this heinous incident as there is absolutely no way to grapple with the victims experience, materially and in its entirety. Surveillance evidence is substantial and for the defendants to assert defensively that it did not take place inevitably warrants the aggressive tactics of having the case dismissed. May it please the South Carolina Court of Appeals; Clerk of Court that the extremity of the defendants' plight is not justified yet the overzealous attempts for dismissal are absurd and erratic. I have complied with the January 14, 2025 Order.

Respectfully Submitted,



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