

BRIEF OF APPELLANT
THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Daniel Coble, Circuit Court Judge

Appellant Case No. 2024-001242
Case No. 2023-CP-400-4408

RECEIVED
FEB 28 2025
SC Court of Appeals

RECORD ON APPEAL

Kamarah Reynolds-Hall

Appellant,

v.

**Jammie Robinson, John Dixon,
Dominic Hill, Joseph Hunter, Anthony
(AJ) Lawson, Javon Benson, Jahmar
Brown, Cincere Scott, Jasmine
Alexander-Coleman, Holder
Properties, University of South
Carolina, Defendants,**

**University of South Carolina
Holder Properties**

Respondents.

[INITIAL] BRIEF OF APPELLANT

Kamarah Reynolds-Hall
5 Alatera Court
Columbia, South Carolina
PRO SE
803-237-6057

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TABLE OF AUTHORITIES

CASES

Barr v. City of Rock Hill, 330 S.C. 640, 645 (S.C. Ct. App. 19981)

1. **Discovery** is Objective, Not Subjective, Question

Brown v. Inv. Mgmt. & Research, Inc., 323 S.C. 395, 400 n. 3, 475 S.E.2d 754, 756 n. 3 (1996).

[U]nder our current pleading rules only ultimate facts are required to be stated in pleadings. Ultimate facts are those which the evidence upon trial will prove, and not the evidence which will be required to prove those facts.”

Burnette v. New York Cent. R. Co. 380 U.S 424, 428 (1965)

A courts equitable power is not bound by cast-iron rules but exist to do fairness and may be applied where it is justifiable under all the circumstances.

Hooper v Ebenezer Sr. Services & Rehab. CTR., 386 S.C. 108, 115 (2009)

In order to serve the ends of justice where **technical forfeitures would unjustifiably prevent a trial on the merits, the doctrine of equitable tolling may be applied to toll the running of the statute of limitations.**

Judy v. Judy, 383 S.C. 1, 6, 677 S.E.2d 213, 216 (Ct. App. 2009). "

"An action in tort for damages is an action at law."

Kreutner v. David, 320 S.C. 283, 285-86, 465 S.E.2d 88, 90 (1995)."

1. The date of which Discovery is Objective, Not Subjective, Question

Newberry Pub. Co., Inc. v. Newberry County Comm'n on Alcohol and Drug Abuse, 417 S.E.2d 870 (S.C. 1992)

1. (finding that the law enforcement division was required to disclose the portions of the criminal investigative report **requested under FOIA**, which included documents otherwise available to the public as public records, since the records were not subject to any exemption contained in the act).

Pelzer, 378 S.C. at 521.

- 1. Appellant would certainly be prejudiced by harsh penalty of dismissal at this stage.**
- 2. As can be seen by the prompt action in the beginning.**
- 3. Plaintiff did not sit on its rights but diligently attempted in good faith to enforce them.**

Raymond v. Eli Lilly and Co., N.H., 371 A.2d 170, 174 (1977).

- 1. The undisputed standard formulated by the Supreme Court of New Hampshire is: "A cause of action will not accrue under the discovery rule until the plaintiff discovers or in the exercise of reasonable diligence should have discovered not only that he has been injured but also that his injury may have been caused by the defendant's conduct"**

Reyes v. City of Chicago, 585 F. Supp. 2d. 1010, 1015 (N.D. Ill. 2008) (emphasis added);

1. Equitable estoppel operates to suspend the running of the statute of limitations where the defendant has actively misled the plaintiff or somehow prevents the plaintiff from *suing* within the limitations period

Sloan v. Friends of Hunley, Inc. (Friends I), 369 S.C. 20, 26, 630 S.E.2d 474, 478 (2006)

1. **Right to inspect or copy public records.**
2. **The purpose of FOIA** is to protect the public by providing a mechanism for the disclosure of information by public bodies.)

Syllabus Point 1, Cart v. Marcum, 188 W.Va. 241, 423 S.E.2d 644 (1992).

Generally, a cause of action accrues (i.e., the statute of limitations begins to run) when a tort occurs; under the 'discovery rule,' the statute of limitations is tolled until a claimant knows or by reasonable diligence should know of his claim

Szczuvelk v. Harborside Healthcare Woods Edge, 182 N.J. 275 (2005).

Although the **discovery rule** provides a safety net for persons with latent injuries or damages that take a long time to manifest, there is an important caveat built into the doctrine. This caveat requires that the persons seeking respite from strict application of statutes of limitation make a **“reasonable” inquiry, or exercise some degree of diligence, in discovering their injuries or damages.**

STATUTE

SC 15-3-530 (5) the law allows lawsuit must be **within three years for** an action for assault, battery, or any injury to the person or rights of another.....

S.C 16-3-210 Assault and Battery by Mob

S.C 16-3-600(D) Assault and Battery

SC § 27-3-30. Duty of Care.....

1. The property owner breached the duty of care.

SC § 27-3-60 (a). Certain Liability not limited.....

S.C. Code Ann. 30-4-10 et seq. (Freedom of Information Act)

A. The purpose of FOIA is to protect the public by providing a mechanism for the disclosure of information by public bodies.

Section 30-4-30, South Carolina Code of Laws, Chapter 4 Freedom of Information.....

Newberry Pub. Co., Inc. v. Newberry County Comm'n on Alcohol and Drug Abuse, 417 S.E.2d 870 (S.C. 1992) (finding that the law enforcement division was required to disclose the portions of **the criminal investigative report requested under FOIA, which included documents otherwise available to the public as public records, since the records were not subject to any exemption contained in the act).**

STATEMENT OF ISSUES ON APPEAL

1. The lawsuit is not time-barred by the two-year statute of limitation under the South Carolina Tort Claims Act?

- a. **Discovery Rule** states the stature of limitations begin to run when a cause of action reasonably ought to have been discovered.
- b. **Equitable Tolling of Statute of Limitations** does not start running until the date discovered or should have discovered the cause of his or her injury.
- c. **Fraudulent Concealment Exception** to Statute of Limitations a close cousin of the **discovery rule** is the 'well accepted principle of fraudulent concealment.

2. The use of **the discovery rule states the stature of limitation begins to run when a cause of action reasonably ought to have been discovered.** The statute runs from the date the injured party knows or should have known by the exercise of reasonable diligence that a cause of action arises from wrongful conduct.

- a. **Crime Date: August 23, 2020**
- b. **Case filed: August 22, 2023**
- c. **Discovery Rule Applied for cause of action: October 2021-October 2023**
- d. **Statute of Limitation Date: October 2021-October 2023**

3. The appellant used **reasonable diligence** by hiring Swerling Law Firm, the hiring of an Martin Investigative Solutions and Access Media video review video footage to find the truth of what occurred on the night of August 23, 2020.

- a. Hired Swerling Law Firm

- b. Hired Martin Investigator Service
- c. Hired Access Media

4. The appellant states that **Equitable Tolling of the Statute of Limitations** does not start running until the date discovered or should have discovered the cause of his or her injury.

5. **§42.9 Fraudulent Concealment Exception to Statute of Limitations for concealment of criminal acts by others**

A close cousin of the **discovery rule** is the 'well accepted principle . . . of fraudulent concealment.' *Mark K. v. Roman Catholic Archbishop of L. A.*, 79 Cal. Rptr. 2d 73, 78 (Cal. Ct. App. 1998) (quoting *Bernson v. Brown*, 873 P.2d 613 (Cal. 1994)).

6. South Carolina Law **SC 15-3-530 (5)** states that a lawsuit must be filed **within three years** for an action for assault, battery, or any injury to the person or rights of another.

Case filed: Aug 22, 2023

Discovery Rule Applied for cause of action: October 2021-October 2023

Statute of Limitation Date: October 2021-October 2024

STATEMENT OF CASE

The respondent has deliberately evaded responsibility since August 23, 2020, by ignoring, delaying, denying and retaliating against the appellant that suffered the aggravated assault and assault by mob.

DATE OF CAUSE OF ACTION: OCTOBER 2021-OCTOBER 2023

DATE OF COMMENCEMENT OF LAWSUIT: AUGUST 22, 2023

HEARING DATE: JULY 9, 2024

APPEAL OF CIRCUIT COURT RULING: YES

APPEALED TO APPELLATE COURT: JULY 24, 2024

THE NATURE OF THE ACTION OF MATTER

THE NATURE OF THE DEFENSE OR OF THE RESPONSE

The University of South Carolina states it will take a court of law to obtain requested video of 650 Lincoln Athletic Apartments.

Discovery Rule

Reasonable Diligence

Discovered a cover up by the respondent

Equitable Tolling of Statute of Limitations

Fraudulent Concealment

South Carolina Law 15-3-530 (5)

THE ACTION OF THE COURT: The circuit court granted the respondent motion to dismiss based on the lawsuit being time-barred by the statute of limitation.

JURY TRIAL REQUESTED: YES

AMOUNT REQUESTED: \$500,000

LEGAL STANDARD OF REVIEW

Appellant would certainly be prejudiced by harsh penalty of dismissal at this stage. As can be seen by the prompt action in the beginning. Plaintiff did not sit on its rights but diligently attempted in good faith to enforce them. **Pelzer, 378 S.C. at 521.**

In order to serve the ends of justice where technical forfeitures would unjustifiably prevent a trial on the merits, may be applied to toll the running of the statute of limitations. **Hooper v Ebenezer Sr. Services & Rehab. CTR., 386 S.C. 108, 115 (2009)**

A courts equitable power is not bound by cast-iron rules but exist to do fairness and may be applied where it is justifiable under all the circumstances. **Burnette v, New York Cent. R. Co. 380 U.S 424, 428 (1965)**

A close cousin of the **discovery rule** is the 'well accepted principle . . . of fraudulent concealment." **Mark K. v. Roman Catholic Archbishop of L. A., 79 Cal. Rptr. 2d 73, 78 (Cal. Ct. App. 1998) (quoting Bernson v. Brown, 873 P.2d 613 (Cal. 1994)).**

- If a fiduciary relationship exists between the plaintiff and defendant, the party asserting fraudulent concealment need not show affirmative concealment of the cause of action, because 'failure to speak where there is a duty to speak is the equivalent of some positive act or artifice planned to prevent inquiry or escape investigation.' **Id. (quoting Hall v. De Saussure, 297 S.W.2d 81, 85 (Tenn. Ct. App. 1956)).**" 2008 WL 4253628 at *6.

The date on which discovery should have been made is an objective, not subjective, question. *Kreutner v. David*, 320 S.C. 283, 285-86, 465 S.E.2d 88, 90 (1995).” *Barr v. City of Rock Hill*, 330 S.C. 640, 645 (S.C. Ct. App. 1998)

The district court concluded that the action was brought within the applicable statute of limitations because the plaintiff would not, **in the exercise of reasonable diligence**, have discovered the possible link between her blindness and appellant's product until after February, 1969. *Raymond v. Eli Lilly and Co., N.H.*, 371 A.2d 170, 174 (1977).

Generally, a cause of action accrues (i.e., the statute of limitations begins to run) when a tort occurs; under the `discovery rule,' the statute of limitations is tolled until a claimant knows or by reasonable diligence should know of his claim.” *Syllabus Point 1, Cart v. Marcum*, 188 W.Va. 241, 423 S.E.2d 644 (1992).

The purpose of FOIA is to protect the public by providing a mechanism for the disclosure of information by public bodies.” *Sloan v. Friends of Hunley, Inc. (Friends I)*, 369 S.C. 20, 26, 630 S.E.2d 474, 478 (2006)

- 1. Right to inspect or copy public records.** Section 30-4-30, South Carolina Code of Laws
Chapter 4 Freedom of Information

SYNOPSIS

The appellant was accepted in the class of 2020 at the Respondent University academically in April 2020 with the student identification number N52421561. The appellant received a walk-on position to play Football for the respondents in January 2020.

On August 23, 2020, the appellant was assaulted by a mob of six (6) 2020 Football Players and lured by 2020 Basketball players on August 23, 2020. The appellant suffered a beating after being lured by two (2) 2020 Respondent Basketball Players Anthony (AJ) Randolph Lawson and Javon Benson to be attacked at 650 Lincoln Athletic Apartments located on the campus of the respondent. The 2020 Respondent Football Players that attacked the appellant were Jammie Robinson, John Dixon, Dominic Hill. Joseph Hunter, Jahmar Brown and Rashad Amos who confirmed in his statement it was the 2020 Basketball players that called them.

The appellant states that the Aggravated Assault and Assault by Mob took away his opportunity to earn a Criminal Justice Degree and play football at his dream school for the respondent. The appellant states that the Aggravated Assault and Assault by Mob took away his opportunity to earn a Criminal Justice Degree and play football at his dream school for the respondent based on his academic success.

The appellant family had to take matters into their own hands to investigate the crime of aggravated assault and assault by mob that occurred at the respondent property on August 23, 2020. A lot of college athlete crimes go un-checked by many Universities and Colleges around the nation. Many Institutions discourage victims from pursuing cases of crimes by athletes and on campus. Investigations are designed for crimes to be swept under the rug by the respondent to avoid responsibility, negative publicity and to protect their brand.

Part 1-Shows the Premeditated Actions https://youtu.be/w_eEsABZ9MY

Part 2-USC Coverup of Assault by Mob Aug 23, 2020 <https://youtu.be/BYHYkoe8XCw>

Part 3-Jammie Robinson lies in statement to USC PD-University of South Carolina-Cover

Up of Assault by Mob <https://youtu.be/sre9YeMeVHM>

Part-5-John Dixon Interview <https://youtu.be/TL7aotENEDw>

http://youtu.be/fQ5DSH5T_mA

InjusticeUniversity of South Carolina by Travis Hall Part 1 of 17 - Sports Talk https://youtu.be/oklnsAZdWuw		InjusticeUniversity of South Carolina by Travis Hall Part 7 of 17 - Victim Kamarah Confirms Assault https://youtu.be/Z1shut6PPGDDQ		InjusticeUniversity of South Carolina by Travis Hall Part 15 of 17 - Fifth Circuit Solicitor https://youtu.be/FudnhFN3_-Q	
InjusticeUniversity of South Carolina by Travis Hall Part 2 of 17 - Lured https://youtu.be/Cbiv_Y3woaeUB		InjusticeUniversity of South Carolina by Travis Hall Part 8 of 17 - Alyze Rhue https://youtu.be/gQZ2i4raPHU		InjusticeUniversity of South Carolina by Travis Hall Part 14 of 17 - Deputy Circuit Solicitor https://youtu.be/AsUOn765uMM	
InjusticeUniversity of South Carolina by Travis Hall Part 3 of 17 - Quad https://youtu.be/3FrIph60fc		InjusticeUniversity of South Carolina by Travis Hall Part 9 of 17 - James Miles and Travis Hall https://youtu.be/Qt05RVu_-hc		InjusticeUniversity of South Carolina by Travis Hall Part 15 of 17 - Voiceover Attacker Jammie https://youtu.be/Ht_dBos9eE	
InjusticeUniversity of South Carolina by Travis Hall Part 4 of 17 - Devalued Black Life https://youtu.be/3lkmAyL-HQ		InjusticeUniversity of South Carolina by Travis Hall Part 10 of 17 - USC PD is Corrupt https://youtu.be/Q5POLKcW5Q		InjusticeUniversity of South Carolina by Travis Hall Part 16 of 17 - Attacker Voiceover John Dixon https://youtu.be/v2Wmfmr58k	
InjusticeUniversity of South Carolina by Travis Hall Part 5 of 17 - Staff Communication https://youtu.be/5Y2Fwjd1n9g		InjusticeUniversity of South Carolina by Travis Hall Part 11 of 17 - Gallman Voiceover https://youtu.be/YeIQXXJbc-k		InjusticeUniversity of South Carolina by Travis Hall Part 17 of 17 - Voiceover Attacker Joseph H https://youtu.be/Cm6g9Tm407D	
InjusticeUniversity of South Carolina by Travis Hall Part 6 of 17 - Director of Football Operations https://youtu.be/NRfuTvg-SY		InjusticeUniversity of South Carolina by Travis Hall Part 12 of 17 - Geary Voiceover https://youtu.be/16Y2zyY2HF		InjusticeUniversity of South Carolina Part 18 of 18 - Premise Liability Holder Properties https://youtu.be/gw5SL_BGog	

FACTS

Fact 1. Constitution of South Carolina, Article I, Section 24

(A) To preserve and protect victims' rights to justice and due process regardless of race, sex, age, religion or economic status, victims of crime have the right to:

- 1) be treated with fairness, respect and dignity, and to be free from intimidation, harassment, or abuse, throughout the criminal and juvenile justice process, and informed of the victim's constitutional rights, provided by statute;

Fact 2. SC ATTORNEY GENERAL-CONFIRMS APPELLANT WAS A VICTIM

- 1. August 23, 2020- June 6, 2021.** Victim never treated as victim, as there were no communication made by the Respondent Police Department until 9 days after the aggravated assault and assault by mob was reported
- 2. October 12, 2020.** Listed him as not being a victim. ♦ See Graf. Case Management ♦ Winnington
- 3.** October 19, 2020. The University of South Carolina writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. See Exhibit: _4_
- 4. June 7, 2021.** Attorney General (DCVC) On June 7, 2021, The Department of Crime Victim Compensation (DCVC) has deemed him a victim pursuant to Section 16-3-1170(4) of the South Carolina Code of Laws.

5. October 2021. Father Film. The film confirms the Aug 2020 account from USC PD Major Miles which shows he is a victim that was attacked in stairwell and then chased and attacked.

Fact 3. OBSTRUCTION OF JUSTICE BEGINS

October 19, 2020. The University of South Carolina writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. See Exhibit: _4_

Fact 4. PROFESSIONALISM FROM THE START

The respondent writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. Exhibit _4_

The appellant suffered a “perfect storm” of injustice. The investigations were infected by serious misconduct by the respondent, the respondent police, and Fifth Circuit Prosecutorial misconduct. There was a tilting of the justice system in favor of the respondent and respondent athletes. It is interesting how **the respondent, respondent police department and the Fifth Circuit Solicitor Office controlled every aspect of the investigations and only arrested the appellant.** The respondent athletes weren’t charged with any crime for the aggravated assault and assault by mob on August 23, 2020.

August 27, 2020. There is audio captured of USCPD Major Geary calling victim father Travis Hall a Mutha Fuca for reporting the aggravated assault and assault by mob.

August 28, 2020. The respondent used its unlimited reach to make false claims to DSS weekly bring undue duress and anguish for having reported the assault on August 27, 2020. **USC PD Jacob Graf called the DSS report line** (803-714-7444 and 803-714-7387) to do a false report on appellant sister for coming after the assault by mob to check on his well-being. The family was subjected to unfounded charges and DSS (Case#2309981) visits that were unproven.

Exhibit 25_

August 31, 2020. USCPD James Miles confirms the aggravated assault and assault by mob was committed. **USC PD concealed the names.**

September 2020. Appellant has **video-audio of SA Stoner calling appellant sister a DYKE in the interview of Odonnel Fortune.** A derogatory term used to refer to a lesbian, commonly towards a lesbian with more masculine physical characteristics.

September 2020. As early as Sept 2020, the respondent 2020 athletes continued their education and athletic careers and transferred without charges that proved their guilt. The respondent knew the details of the aggravated assault and assault by mob that happened to the appellant.

1. **USCPD Chris Gallman-Exhibit__1__ Interview Statement**
2. **USCPD Jacob Graf- Exhibit__2__ Interview Statement**

Oct 8-9th 2020. USC PD notified the appellant criminal attorney (Jack Swerling) that the appellant would be arrested. **We suspect this occurred because of the Billboards placed at the Campus for all to see, that we needed help.**

Oct 10, 2020-Malicious arrest and charges. The appellant was arrested maliciously by the respondent and its police department.

- 1) There were no victims

Oct 12, 2020. The respondent listed appellant as not being a victim. him as not being a victim. See Graf. Case Management

October 19, 2020. The respondent writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. Exhibit: 4

Dec 2020. Deputy Solicitor Dan Goldberg- Victim Status-Controlled

1. Ruled in favor of players to keep them anonymous.
2. Never lists players involved in the assault by mob.

October 27, 2021. USC PD was emailed about the Assault being re-opened because of new evidence.

November 14, 2021. Admission of Assault by Jammie Robinson

He confirms he hit the victim in the (Head) and on **November 14, 2021** confirms **We Beat You** communicated on Twitter Account: Exhibit __12 & 13__

Fact 5. Slander/Libel Lawsuit Settled out of court.....

- 1) **Case 2023-CP-400-4408--Settled out of court**
- 2) There was a public lynching by the respondent of the appellant when athletic department **published an article stating the appellant was a thief and referenced him to a picture of Tyrone Big gums. Tyrone Big gums is character on the Dave Chappel show that is a crack addict who steals for drugs.**

ARGUMENTS

ARGUMENT I. DISCOVERY RULE

Discovery rule states the stature of limitations begin to run when a cause of action reasonably ought to have been discovered. The statute runs from the date the injured party knows or should have known by the exercise of reasonable diligence that a cause of action arises from wrongful conduct.

Case filed: August 22, 2023

Discovery Rule-Statute of Limitation: Cause of Action Date: October 2021 to October 2023

2-Year Statute of Limitation Date: October 2021 to October 2023.

3-Year Statute of Limitation SC 15-3-530 (5) Date: October 2021 to October 2024.

STANDARD OF REVIEW

The appellant did not sit on its rights but diligently attempted, in good faith, to enforce them.

Pelzer, 378 S.C. at 521.

DISCUSSION

October 19, 2020. The Respondent writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. See Exhibit: 4

DISCUSSION-Incident Report-Written as a Skeleton Report

The appellant states **the Incident Report was not documented** by the respondent on the day it was reported chose to ignore the aggravated assault and the assault by mob

August 27, 2020. The appellant states he was actively being prevented the right to file and having it investigated.

August 27, 2020. The appellant states it took **4-days for the respondent to document** the reported aggravated assault and assault by mob. by the respondent and its police department.

August 31, 2020. The appellant states that **Lt. McKeller filed the Incident report.** Lt. McKellar was not there on Aug 27, 2020, reported aggravated assault and assault by mob.

R. CS218R

By: WEINSCHS. 09/02/2020 10:43

Page 2

REPORTING OFFICER NARRATIVE

University Of South Carolina Police

Victim REYNOLDS-HALL, KAMARAH	Offense ASSAULT / SIMPLE ASSAULT	OCA 20-00999
		Date / Time Reported Thu 08/27/2020 09:00

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

The father, Travis Hall, of the listed victim came into police headquarters on 08/27/20 to report his son had been assaulted by several individuals on 08/23/20 while at 650 Lincoln St. Inv. Graf, who was investigating a related incident, initially met with Hall and requested the victim be present. The victim (Kamarah Reynolds-Hall) came to USCPD and was interviewed regarding his involvement in both incidents. Major Geary was also present and met with the victim's father during the interview. The interview was documented on body worn camera. Investigation is ongoing.

Reporting Officer Narrative-Lt. McKellar-Wall of Silence

Failure to thoroughly investigate the assault case. Video Evidence of Premeditated Assault

1. Prevented the Filing of Assault Report
2. Incident Report filed 4 days after being reported to USC PD Jacob Graf.
3. Wrote skeleton Report
4. Incident Report Dated 9-3-2020 is when appellant received a copy
5. Omits the aggravated assault and assault by mob.
6. Omits names of the four (4) 2020 Basketball players that lured the appellant
7. Omits names of the six (6) 2020 Football Players that attacked the appellant.
8. Omits location: 650 Lincoln Athletic apartments on the campus of the university of South Carolina.

October 19, 2020. The Respondent writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. See Exhibit: 4

October 12, 2021, at 4:45 PM, JACK SWERLING <jacklaw@aol.com

Mr. Gipson said you need to stop calling his office and he will not talk or meet with you – only me. The Solicitor and Assistant Solicitor are not very happy about some of the actions you have taken, which now are making things more difficult to even attempt to work out.

October 15, 2021. I requested the case be re-opened.

Lt. Shannon McKellar directed Officer Aiken to type the supplemental containing the names listed and the video evidence of the assault. I provided additional information to the USC PD.

October 18, 2021- USCPD Gallman wrote on Oct 18, 2021

Who is the true Point of Contact for new Information of the Assault?

I am no longer assigned to the Investigations unit; however, I have attached the Investigations supervisor (Lt. McKellar) to this email so that he is aware of and can advise you on how to proceed.

October 22, 2021-USCPD Chris Gallman to Travis Hall

From: USCPD Chris Gallman

Sorry for the delayed response, I am unsure if anyone has reached out to you as of yet.

I am no longer assigned to the Investigations unit; however, I have attached the Investigations supervisor (Lt. Shannon McKellar) to this email so that he is aware of and can advise you on how to proceed.

DISCUSSION-FOIA

The **respondent** and the Fifth Circuit Solicitor Office decided in the best interest of the school and athletes that it would conceal those responsible from the appellant and the public about the six (6) 2020 University of South Carolina Football Players and two (2) members of the 2020 respondent Basketball Players.

The appellant states that **the respondent refusal to supply the FOIA** caused delays in finding out the events that occurred August 23, 2020. The appellant was not provided any FOIA to gain information and kept the family in the dark for seven (7) months away from any information about the aggravated assault and assault by mob.

September 16, 2020-FOIA requests. The **respondent** admits that it **violated the law by not providing the requested FOIA documents. Exhibit# 4**

October 8, 2020-FOIA requests. The **respondent** stated that it does not believe that the items requested are allowed due to legal exemptions under state law.

October 12, 2020. Appellant writes **the respondent about gaining access to FOIA documents** and videos of 650 Lincoln Athletic Dorms where the aggravated assault and assault by mob occurred on August 23, 2020. **Exhibit: 11**

DISCUSSION-BOTCHED THE ASSAULT INVESTIGATION

Assault Investigator: USCPD Chris Gallman

The respondent violated its fundamental duty to serve the community; to safeguard lives...protect the innocent against **deception**, the weak against oppression...the peaceful against violence...and to respect the constitutional rights of liberty, equality and justice of the Law Enforcement Code of Ethics.

Proof of Mob Assault August 23, 2020.

The USC PD Major Miles confirms the assault by mob after watching the video of the attack.

The appellant states that USC PD Major Miles says that USC has 3300 cameras around the and campus.

1. Video admission of the USC-PD Major Miles
2. Official statements by attackers

3. It was premeditated-with female accomplice.
4. Intent was to commit a crime of assault.
5. Head Injury-Jammie Robinson committed aggravated Assault in the stairwell by hitting him in the back of the head. A punch that could have killed him.

Probable Cause to Arrest the four that lured plaintiff to 650 Lincoln Athletic Dorms on the campus of the respondent.

- a. Anthony (AJ) Lawson-Dallas Mavericks-2020 Basketball player.
- b. Javon Benson-Hampton University-2020 Basketball player.
- c. Jasmine Alexander-Coleman-
- d. Cincere Scott-Visitor of Javon Benson.

Probable Cause to Arrest the six (6) 2020 Football Players that attacked the appellant inside the stairwell and out to the garage of 650 Lincoln Athletic Dorms on the campus of the respondent.

1. Jammie Robinson
2. John Dixon
3. Dominic Hill
4. Joseph Hunter
5. Jahmar Brown
6. Rashad Amos statement to USCPD Jacob Graf says it was basketball that called them.

**ARGUMENT II. DID THE APPELLANT USE REASONABLE
DILEGENCE TO FIND THE TRUTH**

STANDARD OF REVIEW

Pelzer, 378 S.C. at 521.

- 1. Appellant would certainly be prejudiced by harsh penalty of dismissal at this stage.**
- 2. As can be seen by the prompt action in the beginning.**
- 3. Plaintiff did not sit on its rights but diligently attempted in good faith to enforce them.**

DISCUSSION-REASONABLE DILIGENCE

To get the truth the appellant **used reasonable diligence to find the truth.** The appellant obtained legal representation of Swerling Law Firm, Hired Investigator from Martin Investigator Solution to review the Discovery and Access Media to assemble the videos.

In September 2020, the appellant and his family went to social media to speak-out against the aggravated assault and assault by mob. It received media attention but still no details from the USC PD.

September 16, 2020-FOIA requests. The **respondent** denied access to the videos for numerous reasons, therefore violating the FOIA Act. The **respondent** admits that it violated the law by not providing the requested FOIA documents. **Exhibit#_4_**

October 8, 2020-FOIA requests. The **respondent** stated that it does not believe that the items requested are allowed due to legally allowed exemptions under state law. There is no state law that denies access to information.

October 12, 2020. The appellant writes the **respondent** about gaining access to FOIA documents and videos of 650 Lincoln Athletic Dorms where the aggravated assault and assault by mob occurred on August 23, 2020. **Exhibit: __ 11 __**

October 19, 2020. The Respondent writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. Exhibit: 4_

DISCUSSION-BILLBOARDS

October 2020. The appellant family appealed to the University, students of the University and the public for anyone who make have film footage of the aggravated assault and assault by mob. **Exhibit_____**

DISCUSSION-HIRED SWERLING LAW FIRM

October 10, 2020, through May 2022. The appellant hired **Swerling Law Firm** to defend the Malicious criminal charge. The appellant was charged maliciously with first degree burglary because of reporting the crimes committed against him and for pursuing the crime of the aggravated assault and the assault by mob.

October 12, 2021. Fifth Circuit Solicitor Office. The appellant emails Byron Gipson, the Fifth Circuit Solicitor to question why there has not been no arrest of the aggravated assault and the assault by mob. **Exhibit_2_**

October 12, 2021. Byron Gipson, the Fifth Circuit Solicitor says the following Travis Hall continues to call this office to get a conversation about his son (victim of aggravated assault and assault by mob). **Byron Gipson, the Fifth Circuit Solicitor says he don't plan to talk to the victim father and don't plan to do. He says in the email that he, Dale Scott and Jack Swerling will discuss Travis Hall repeated attempts to contact him being an elected official.**

Exhibit: __5__

October 18, 2021. Byron Gipson, emails appellant lawyer that he wants to get a collective handle of Travis Hall contacting people in state government...the Fifth Circuit Solicitor says Travis Hall continues to call this office to get a conversation about his son (aggravated assault and assault by mob). **Byron Gipson, the Fifth Circuit Solicitor says he doesn't plan to talk to the victim father and don't plan to.** He says in the email that he; Dale Scott and Jack Swerling will discuss Travis Hall repeated attempts to contact him being an elected official.

Exhibit_10__20__

October 27, 2021. USC PD was emailed about the Assault being re-opened because of new evidence.

- a. **The supplemental was emailed to question why the attackers were not on the Incident Report. Exhibit__21__**
- a. Fifth Circuit Solicitor-Byron Gipson. **Exhibit _P_ Byron Gipson**
- b. Email to Fifth Circuit Solicitor as to why there are no arrests. **Exhibit P-O**
Oct 12, 2021
- c. Incident Report-Bare minimum information. **Exhibit _P-1__**

- d. South Carolina law about Lynching. **Exhibit_P-2__**
- e. Deputy Fifth Circuit Solicitor Dan Goldberg. **Exhibit_P-3_**No charges for unknown attackers
- f. USC Case Management _Dated March 22-2021 **Exhibit_P-4__**Victim Status removed
- g. **Case Supplemental-October 15, 2021__Exhibit_P-5__**USC-PD refused to document the crime the Victim suffered an aggravated assault and assault by mob.
- h. **Video Evidence__Exhibit_P-6** There is video evidence to support he was a victim, and the attackers should have been arrested.

DISCUSSION-HIRED INVESTIGATOR

Martin Investigative Solutions was hired for the criminal case and the assault case.

March 2021 through August 2021. Hired Martin Investigative Solutions to dissect both discovery files. **Exhibit_1-C_**

March 27, 2021. Martin Investigative Service states that the further we dig (the discovery) the worse it gets for USCPD. **Exhibit: __4-1__**

May 27, 2021. **Martin Investigative Solutions**

- a. Investigator Martin states that the more we dig into this case **the worst it gets for USCPD.**
- b. The investigation of the Discovery took nine (9) months

- c. **Written Statements- Interview Statement-USCPD Chris Gallman-
Exhibit_1_**
- d. **Written Statements- Interview Statement- USCPD Jacob Graf-
Exhibit__2__**
- e. **Video evidence**
- f. **Assault Report and Investigation**
- g. Probable Cause-Assault in progress
- h. Probable Cause-Video Evidence
- i. Probable cause-False Statements
- j. Probable cause-False Statements-False 3 on 3
- k. Probable Cause-Dominic Hill

DISCUSSION-HIRED ACCESS MEDIA

August 2021 to December 2021. The appellate hired Access Multi-media to review video footage of the aggravated assault and assault by mob and the malicious charge. Hidden amongst hours of videos and interviews might be a thread that unravels an entire case.

1. **Probable Cause-** Assault in progress
2. Probable Cause-
3. Probable Cause-Video Evidence
4. Probable cause-False Statements and False 3 on 3
5. Probable Cause-Reenactment of the assault-Video

ARGUMENT III. The appellant discovered a Cover-Up of the aggravated assault and assault by mob

DISCUSSION

The appellant discovered a Cover-Up of the aggravated assault and assault by mob by the respondent, USC PD and the Fifth Circuit Solicitor.

October 12, 2021. The appellant requested that the respondent Police Department arrest the 2020 Basketball Players and 2020 Football Players.

October 2021. Evidence disclosed a Cover-Up by the Respondent and the Fifth Circuit Solicitor Office to protect the Respondent and its athletic players.

1. 2020 Football Program
2. 2020 Basketball Program

October 12, 2021. **Byron Gipson writes** to appellant criminal attorney that his father Travis Hall continues to call this office and email to him in an effort to engage him about his son being assaulted. **He has not spoken to Travis Hall and do not plan to talk to Travis Hall.** He says in the email that he, Dale Scott and Jack Swerling will discuss Travis Hall repeated attempts to contact him being an elected official. **Exhibit: 5 4-2 16**

October 15, 2021. **USCPD** still refused to re-open the case. **Exhibit 1-G**

October 15, 2021. USC PD. The appellant goes to the USC PD of the University of South Carolina to question why there has not been arrest of the aggravated assault and the assault by mob. **Exhibit 3** _____

October 16, 2021. The appellant requested that the Fifth Circuit Solicitor arrest the 2020 Basketball Players and 2020 Football Players. **Exhibit #2. dated Oct 16, 2021.**

- a. The system was rigged in favor of the respondent.
- b. **Incident Report:** The report did not document the assault on the Victims report
- c. USCPD handled the **assault case-It was unfounded in favor of USC**
- d. USCPD handled the **criminal case-It was founded in favor of USC**

October 18, 2021. The appellant attorney writes the following statement that Byron Gipson, **the Fifth Circuit Solicitor Byron Gipson is not happy of contact with several legislators and others.** **Exhibit: _6_ 1-D-7** _____

October 18, 2021. **USCPD Chris Gallman** and Shannon McKellar. **He writes he is no longer assigned to the investigation and Lt. McKellar can assist. He never communicated.**

- a. **Obstruction of Justice-Hinderance** of Prosecution of the respondent 2020 Football and Basketball players.
- b. **Incident Reports**-No documentation of the aggravated assault and the assault by mob.
- c. **Concealment of the evidence. The written statements and the video evidence produced by the appellant family.**

- a. Aggravated assault admission by Jammie Robinson provided to USCPD Jacob Graf.
- b. Aggravated assault admission by John Dixon that was provided to USCPD Jacob Graf and USCPD Chris Gallman
- c. Aggravated assault admission by Dominic Hill that was provided to USCPD Jacob Graf
- d. Written Statements provided to USCPD Jacob Graf
- e. Written Statements provided to USCPD Chris Gallman
- f. Re-Enactment of Assault

November 14, 2021. Admission of Assault by Jammie Robinson

- e. Jammie Robinson laughing at the Assault and Justice in South Carolina.
- f. Concealment of Jammie Robinson not listed in the assault reports or the criminal report.
- g. Jammie Robinson confirms he hit the victim in the (Head) and in November 14, 2021 confirms We Beat You communicated on Twitter Account:
Exhibit_12 & 13_

ARGUMENT IV. EQUITABLE TOLLING OF STATUTE OF LIMITATIONS

Discovery Rule-Statute of Limitation: Cause of Action Date: October 2021 to October 2023

2-Year Statute of Limitation Date: October 2021 to October 2023.

3-Year Statute of Limitation SC 15-3-530 (5) Date: October 2021 to October 2024.

STANDARD OF REVIEW

Plaintiff would certainly be prejudiced by harsh penalty of dismissal at this stage. As can be seen by the prompt action in the beginning. Plaintiff did not sit on its rights but diligently attempted in good faith to enforce them. Pelzer, 378 S.C. at 521.

a court's equitable power "is not bound by cast-iron rules but exists to do fairness ... [and] may be applied where it is justified under all the circumstances." ! Burnettv. New York Cent. R. Co., 380 U.S. 424,428 (1965).

"Equitable tolling applies where the defendant is shown to have actively misled or prevented the plaintiff in some extraordinary way from discovering the facts essential to the filing of a timely lawsuit, Hooper, 386 S.C. at 116 (emphasis added) (quoting Kaplan v. Morgan Stanley & Co., 186 Vt. 605 (2009)).

Furthermore, the Court went on to say that "the situations described above do not constitute an exclusive list of circumstances that justify the application of equitable tolling." Burnett v. New York Cent. R. Co., 380 U.S. 424,428 (1965).

DISCUSSION

The Appellant argues that the Equitable Tolling of the statute of limitations should be tolled based on the date of October 2021. The respondent and the respondent Police department and the Fifth Circuit Solicitor Office did a wide variety of retaliation to prevent the appellant.

Things the respondent did to prevent the appellant from finding out the truth.

- 1) Failure to intervene
- 2) Failure to document the aggravated assault and assault by mob.
- 3) Botched Assault Investigation by USCPD Chris Gallman
- 4) Video Evidence of Premeditated Assault
- 5) Attackers chose time to assault victim. See statements and video evidence.
- 6) Timeline of USC PD Chris Gallman. No Documentation of Assault by USC PD Officer Chris Gallman. See written timelines.
- 7) Timeline of USC PD Jacob Graf. No Documentation of Assault by USC PD Officer Chris Gallman.
- 8) Probable Cause
- 9) Omissions of the Assault on any official documentation at USCPD.
- 10) False Official Statements. Statements of Assault to USC PD Gallman
- 11) False Official Statements. Statements of Assault to USC PD Graf
- 12) Stairwell Video. The stairwell video was removed by the respondent and the Fifth Circuit Solicitor Office.
- 13) Stairwell Assault Details to USC PD Chris Gallman
- 14) Stairwell Assault Details to USC PD Jacob Graf

Solicitor Byron Gipson, Fifth Circuit

Prosecutor Misconduct

False Charges against

False Arrest: 8-23-2020

Exhibit _____

The Appellant states the Fifth Circuit Solicitor prosecuted the charge of First-Degree Burglary and Vandalism against the victim.

1. No prosecutorial charges for the respondent 2020 Football and Basketball players for the aggravated assault and assault by mob by 2020 University of South Carolina athletes.

DOUBLE JEOPARDY BY USCPD AND FIFTH CIRCUIT SOLICITOR

USCPD-Chain of Command

The appellant states that USCPD Major James Miles supervises the three members in his chain of command that are assigned to the investigations.

2. USCPD Lt. McKellar supervises both of the investigators assigned to the assault case and the criminal case.
3. USCPD Jacob Graf-Investigator for the malicious burglary charge.
4. USCPD Chris Gallman-Assault Investigator.

USC PD

The respondent filed malicious charges against the victim for pursuing the aggravated assault and assault by mob crimes.

- a. No charges for the aggravated assault and assault by mob by 2020 respondent football and basketball athletes.

Dan Goldberg-Deputy Solicitor

1. He handled the Malicious Prosecution of the appellant.
2. He handled the Assault Case which he ruled there was not enough evidence to charge the six (6) 2020 football players that were not listed on any reports except Jammie Robinson. There were two (2) 2020 basketball players that lured the victim to 650 Lincoln Athletic Dorms on the campus of the respondent.

October 18, 2021-Fifth Circuit Solicitor@12:56 pm

The Solicitor will not succumb to pressure.

Apparently, you have been in communication with several legislators and others in an effort to persuade him to drop the case etc.

You are hurting Kamarah's case and may have already done damage beyond repair.

The Solicitor wants to see me.

October 18, 2021-Travis Hall to Lawyer

Sir, I spoke with the legislature as a citizen not as a tool to persuade anyone. I never asked anyone to persuade but I did exercise my right as a citizen in my district.

I wish the Solicitor was non-biased.

October 18, 2021@1102-Lawyer to Travis Hall

In my opinion, what you are doing is hurting Kamarah case.

USCPD. Travis- got a call this morning from Respondent police. They are concerned about what you are putting on FB, names of players etc.

October 18, 2021-USC PD inquiry about my lawyer status.

In my opinion, what you are doing is hurting Kamarrah case.

ARGUMENT V. Fraudulent Concealment Exception to Statute of Limitations

DISCUSSION-FOIA REQUESTS BY THE FAMILY WAS REFUSED

The respondent admits that it violated the law by not providing the requested FOIA documents.

Exhibit# _4_

September 16, 2020-FOIA requests. The **respondent** denied access to the videos for numerous reasons, therefore violating the FOIA Act. Exhibit _4_

September 2020. The respondent knew the details of the aggravated assault and assault by mob that happened to the appellant.

Interview Statements

- a. USCPD Chris Gallman-Exhibit _1_ Interview Statement
- b. USCPD Jacob Graf- Exhibit _2_ Interview Statement

October 8, 2020-FOIA requests. The Respondent stated that it does not believe that the items requested are not allowed due to legally allowed exemptions under state law.

October 12, 2020. The appellant **wrote the respondent about gaining access to FOIA** documents and videos of 650 Lincoln Athletic Dorms where the aggravated assault and assault by mob occurred on August 23, 2020. **Exhibit: _11_**

October 12, 2020. No victim, No case

Case Management sheet Exhibit _1-H_

Timeline -USCPD Chris Gallman Exhibit-1-H-1

Timeline-USCPD Jacob Graf__ Exhibit-1-H-2_____

October 19, 2020. The **respondent** writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. **Exhibit: -4_**

November 14, 2021. Admission of Assault by Jammie Robinson

b. He confirms he hit the victim in the (Head) and that they

We Beat You communicated on Twitter Account:

DISCUSSION-CONCEALMENT

1. **Video Evidence** of Premeditated Assault
2. **Attackers chose time to assault victim.** See statements and video evidence.
3. **Timeline of USC PD Chris Gallman.** No Documentation of Assault by Respondent PD Officer Chris Gallman. See written timelines.
4. **Timeline of USC PD Jacob Graf.** No Documentation of Assault by Respondent PD Chris Gallman.
5. **Probable Cause**
6. **Omissions of the Assault on any official documentation at USCPD.**
7. **False Official Statements.** Statements of Assault to Respondent PD Gallman
8. **False Official Statements.** Statements of Assault to Respondent PD Graf
9. **Stairwell Video.** The stairwell video was removed by the respondent and the Fifth Circuit Solicitor Office.

10. **Stairwell Assault Details** to Respondent PD Jacob Graf and USC PD Chris Gallman
11. **Garage Video Evidence. USCPD Jacob Graf** says on video that the thing in the garage was totally unfair but didn't document. There was probable cause to arrest the six (6) it's an assault by Mob. Respondent PD Graf and the respondent had evidence to arrest.
12. **Garage Video Evidence. USCPD Major James Miles** says on video it's Assault by Mob. Respondent PD Graf and the entire University Garage Details of Assault
13. **Concealment of Dominic Hill.** In his statement to Respondent PD Graf, he states he hits and slaps the victim. See video evidence of re-enactment after the assault outside and inside of the elevator at 650 Lincoln Dorms. It was a 6 on 1 assault.
14. **Concealment of Dominic Hill not listed in the assault report. Dominic Hill statement says he hits and slaps the victim.** Jasmine Alexander says in her statement someone hit the victim in the face, but she can't recall. He re-enacts the actual assault how it occurred.
15. **Concealment of Jammie Robinson not listed in the assault reports. He confirms he hit the victim (Head).**
16. **Concealment of John Dixon not listed in the assault reports.** John Dixon statement to Respondent PD says **he confronted the victim first.**
17. **Concealment of Joseph Hunter not listed in the assault reports.** Joseph Hunter statement to Respondent PD Graf and SA Sloan states that Jammie Robinson hit victim in head.
18. **Concealment of Rashad Amos not listed in the assault reports.** Rashad Amos statement is the 2020 Basketball players AJ Lawson and Javon Benson are the one who contacted Jammie Robinson who later assembled a mob.

**ARGUMENT VI. SOUTH CAROLINA LAW 15-3-530 (5) THE LAW SAYS
WITHIN 3 YEARS FOR AN ACTION FOR ASSAULT, BATTERY, OR
ANY INJURY TO THE PERSON OR RIGHTS OF ANOTHER**

Discovery Rule-Statute of Limitation: Cause of Action Date: October 2021 to October 2023

2-Year Statute of Limitation Date: October 2021 to October 2023.

3-Year Statute of Limitation SC 15-3-530 (5) Date: October 2021 to October 2024.

DISCUSSION

The injured person must prove only that the incident occurred, and that the defendant was responsible. The Appellant was unaware who lured him to be attacked at 650 Lincoln Athletic Dorms owned by the respondents August 23, 2020.

Appellant states **he suffered head injury** from the Closed Fist Concussion to the back of the head by Jammie Robinson. **The blow to the back of the head caused injury and now have permanent head disfigurement and headaches.**

The Appellant states that **Jammie Robinson admits to (aggravated assault)** the statement provided to USCPD Chris Gallman.

- a. **John Dixon confirms that it was a hard hit to the head.**
- b. **John Dixon is seen on video chasing and assaulting victim** in pursuit of him as **he tries to run away.**
- c. Joseph Hunter **described the severity of the punch** to the back of the head knocking victim in between the stairs.

- d. Jasmine Alexander-Coleman says someone struck him in the face but doesn't know who hit Reynolds-Hall.
- e. Dominic Hill was concealed and on video describing his role in assaulting Reynolds-Hall according to his statement hitting and slapping him.

USCPD

Respondent PD Jacob Graf. Coach T-Rob. Jammie Robinson told him that he hit someone but didn't know who it was. USCPD Graf writes the statement.

Respondent PD Jacob Graf. Assault. Joseph Hunter says Jammie doesn't hesitate to hit appellant.

Respondent PD Jacob Graf. Joseph Hunter described **the impact of the punch to the back of Reynolds-Hall Head that caused Reynolds-Hall to fall back between the stairway and door.**

Respondent PD Jacob Graf. John Dixon and Joseph Hunter. Impact of Jammie Robinson Sucker punch. **John Dixon** says Jammie Robinson hit Reynolds-Hall in the head hard.

1. **Implications in statements and video evidence.** Jammie Robinson says it was him John Dixon and Dominic Hill.

- a. Jammie Robinson says John Dixon grabs appellant and throws him to the ground.
- b. Jammie Robinson says Dominic Hill hits appellant.

2. **Implications in statements and video evidence to USC PD Gallman.** John Dixon makes a false statement saying that the only people involved in the Assault by Mob was he, Jammie Robinson and Dominic Hill.
3. Jammie Robinson says John Dixon grabs victim and throws him to the ground. Jammie Robinson says Dominic Hill hits victim.
4. Dominic Hill admits it was him, John Dixon and Jammie Robinson in a 3 on 3 fight.
5. **Statement provided to Respondent PD Graf. Dominic Hill admits he hits and slaps victims.**
6. **Re-Enactment of Assault.** Video Evidence of Jammie Robinson, John Dixon, Dominic Hill, Joseph Hunter, Rashad Amos and Jahmar Brown.

CLOSING STATEMENT

Appellant states that **every citizen has a right to have law enforcement investigate cases fairly.** The Respondent acted in its own interest and Covered Up the aggravated assault and assault by mob of the incoming freshmen member of the Respondent Football Program. The Respondent infringed its power over the entire investigation with the assistance of the Fifth Circuit Solicitor by weaponizing the court system against the appellant. **The Respondent writes it will take a court of law to obtain video evidence that was entrusted with the Fifth Circuit Solicitor Byron Gipson. See Exhibit: _4_**

The Discovery Rule states the stature of limitations begin to run when a cause of action reasonably ought to have been discovered. The statute runs from the date the injured party knows or should have known by **the exercise of reasonable diligence** that a cause of action arises from wrongful conduct.

Discovery Rule-Statute of Limitation: Cause of Action Date: October 2021 to October 2023

2-Year Statute of Limitation Date: October 2021 to October 2023.

3-Year Statute of Limitation SC 15-3-530 (5) Date: October 2021 to October 2024.

The appellant did not sit on its rights but diligently attempted, in good faith, to enforce them.

Pelzer, 378 S.C. at 521. The appellant and his family appealed to the public for help by going to the news media, the family appealed by billboards to the University Student body for information about the aggravated assault and assault by mob by offering an award.

The appellant hired the Swerling Law Firm for representation of the criminal case. The appellant was framed and given a criminal record for reporting the aggravated assault and assault by mob.

The appellant hired the Martin Investigative Service to investigate the Discovery that the contained information about concealed evidence of the aggravated assault and assault by mob.

The appellant hired Access Multi Media Company to put together video footage of building 650 Lincoln Athletic Dorms where the aggravated assault and assault by mob happened.

The appellant states that Equitable Tolling of the Statute of Limitations does not start running until the date discovered or should have discovered the cause of his or her injury. The hired services help establish October 2021 as the date of learning who all was responsible with video evidence.

Equitable Tolling of the Statute of Limitations: October 2021 to October 2023

Discovery Rule-Statute of Limitation: Cause of Action Date: October 2021 to October 2023

2-Year Statute of Limitation Date: October 2021 to October 2023.

3-Year Statute of Limitation SC 15-3-530 (5) Date: October 2021 to October 2024.

Appellant prays for the following:

1. A reversal of the lower court ruling of the lawsuit being timed barred.
2. For a court order **granting judgement** to the appellant in the amount of \$300,000 for economic damages, for the pain and suffering, medical expenses and loss of enjoyment of life, emotional distress, and mental anguish (past, present and future).
3. For such other relief as the Court finds just and reasonable to the appellant.

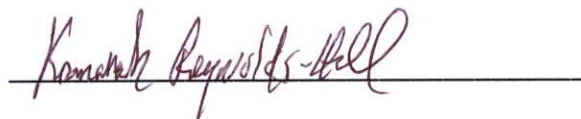
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Attorney for University of South Carolina

A handwritten signature in dark ink, reading "Kamarah Reynolds-Hall", is written over a solid horizontal line.

Kamarah Reynolds-Hall
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803-237-6057

PRO SE