



July 22, 2025

**Via Email Only**

Hon. H. Bruce Williams  
Hon. John D. Geathers  
Hon. Matthew P. Turner  
c/o Hon. Jenny Abbott Kitchings, Clerk of Court  
SOUTH CAROLINA COURT OF APPEALS  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**RE: Andrew Pampu, et al. vs. CLAWSON FARGNOLI, LLC, et al.**  
**Trial Court Case No.: 2021-CP-10-01343; Appellate Case No.: 2023-001779**

Dear Hon. H. Bruce Williams, Hon. John D. Geathers, and Hon. Matthew P. Turner:

On behalf of the Appellants in the above-referenced matter, this is submitted pursuant to Rule 208(b)(7), SCACR, as a supplement of citation to address the application of the holdings in the recent *Walker v. AnMed Health*, App. Case. No. 2021-001036, \_\_\_ S.C. \_\_\_, \_\_\_ S.E.2d \_\_\_, 2025 WL 1943756 (Ct. App. July 16, 2025) opinion to the arguments presented in the Appellants' briefs in the matter of *Andrew Pampu, et al. v. Clawson Fargnoli, LLC, et al.*

The *Walker v. AnMed Health* opinion provides significant guidance on the sufficiency of expert affidavits under S.C. CODE ANN. § 15-36-100. Specifically, the *Walker* court emphasized that an expert affidavit need only specify one negligent act or omission and the factual basis for the claim, as long as the expert possesses the requisite qualifications under § 15-36-100(A). This holding directly supports the Appellants' position that the affidavit of Justin Dillon, Esq., filed with their amended complaint, satisfies the statutory requirements. This is relevant to the arguments on pages 28-30 of the Appellants' Reply Brief, where the sufficiency of Justin Dillon, Esq.'s affidavit is discussed.

Additionally, the *Walker* opinion underscores the importance of evaluating expert affidavits in the context of the claims they support. The *Walker* court recognized that an expert's qualifications need not align perfectly with every aspect of the case, as long as the expert possesses specialized knowledge relevant to the issues at hand. This is pertinent to the arguments on pages 30-31 of the Appellants' Brief, which address Mr. Dillon's expertise in Title IX litigation.

Finally, the *Walker* decision reaffirms that the sufficiency of an expert affidavit should be assessed based on its ability to assist the trier of fact in understanding the evidence and determining the issues in the case. This aligns with the arguments on pages 12-13 of the Appellants' Reply Brief, which highlight the affidavit's relevance to the claims of professional negligence.

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Page 2 of 2

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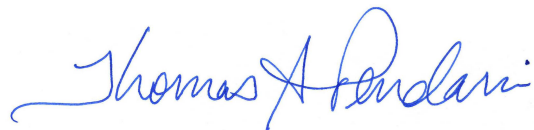
In light of the holdings in *Walker v. AnMed Health*, the Appellants respectfully submit this supplemental citation to assist the Court in its review of the trial court's rulings. No argument is intended by this submission.

By copy of this correspondence, we are serving a copy, via email, to all counsel of record.

With warmest personal regards, I am

Sincerely,

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis

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