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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2024-001940
Case Nos. 2021-CP-40-1484 and 2021-CP-40-1971

Lisa Wallas,..... Appellant,

v.

Richland County Sheriff's Departments and Casey Elizabeth Signorino, ... Respondents,

and

Lisa Wallas, as Natural Guardian of A.W., Minor Child, ... Appellant,

v.

Richland County Sheriff's Department, South Carolina Department of Social Services, Richland County Department of Social Services, and Casey Elizabeth Signorino,..... Defendants,

Of Which Richland County Sheriff's Department and Casey Elizabeth Signorino are ..... Respondents.

BRIEF OF RESPONDENTS

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STATEMENT OF THE CASE

These companion lawsuits were commenced by the Appellant Lisa Wallas both individually and as the natural guardian of Ainsley Wallas, a minor.[1] Both lawsuits were brought against the Respondents Richland County Sheriff's Department ("RCSD") and Casey Elizabeth Signorino. Signorino was a deputy sheriff with the RCSD.

These lawsuits arise from the identical factual scenario. In 2020, the minor, Ainsley Wallas, was the fifteen-year-old daughter of Lisa Wallas and Terry Wallas, who were divorced. On May 22, 2020, the Appellant Lisa Wallas reported her daughter as a runaway. On the following Tuesday, May 26, 2020, the RCSD received a report that Ainsley had been located. This information was provided by one of Ainsley's high school teachers and a parent of Ainsley's friend. (R. 2). The Respondent Signorino responded to Dutch Fork High School and made contact with Ainsley as well as the individuals who made the report to law enforcement. In the interviews, Deputy Signorino learned that Ainsley had run away from home because she was being abused at her mother's home. (R. 2).

After conducting the interviews, Deputy Signorino returned to her patrol vehicle and placed a three-way call with both parents, Lisa Wallas and Terry Wallas. She relayed to the parents that she had located and met with Ainsley, and she informed them of Ainsley's abuse allegations. (R. 2). Deputy Signorino learned that the parents were divorced and that the mother had primary custody of Ainsley and the father had visitation rights. (R. 2). Lisa Wallas wanted Ainsley to be returned home. Ultimately, Deputy Signorino attempted to mediate the situation to find a solution to protect Ainsley. She advised the parents that there were two

[1] Although Lisa Wallas is the plaintiff in each action, albeit in different capacities, this brief will refer to her using the plural "Appellants" to reflect that she has sued in a different capacity in each action.

options, either Ainsley could be placed in emergency protective custody or she could be placed with a friend or relative. (R. 2). The parents agreed for Ainsley to be placed temporarily with the father until the underlying issues could be worked out. (R. 2-3).

In both companion actions, the Appellants alleged causes of action for intentional infliction of emotional distress, abuse of process, malicious prosecution, negligence, and breach of fiduciary duty. The parties ultimately filed cross motions for summary judgment in both cases. (R. 84-95). Those cross motions were heard via WebEx by Circuit Court Judge Diane S. Goodstein on June 21, 2024. (R. 137-165). Thereafter, by Order filed on October 21, 2024, the trial court granted the Respondents' motions for summary judgment and denied the Appellants' motions for summary judgment in both actions. (R. 1-9). The rulings were the same in both cases and resulted in the dismissal of both actions with prejudice. Summary judgment was entered in favor of the Respondents on multiple bases, including immunity defenses under the South Carolina Tort Claims Act. (R. 1-9).

The Appellants did not file any motions for reconsideration. Instead, they filed an appeal to this Court.

STANDARD OF REVIEW

As the South Carolina Supreme Court has explained, "[w]hen parties file cross-motions for summary judgment, the issue is decided as a matter of law." *United States Auto. Asso. v. Pickens*, 434 S.C. 60, 862 S.E.2d 442, 444 (2021). Moreover, it is well established that "[w]here cross motions for summary judgment are filed, the parties concede the issue before us should be decided as a matter of law." *Buonaiuto v. Town of Hilton Head Island*, 440 S.C. 144, 889 S.E.2d 625, 630 (Ct. App. 2023). Indeed, the Supreme Court has confirmed that "the parties filed cross motions for summary judgment, thereby indicating the parties' belief that further development of the facts was unnecessary." *Alltel Communications, Inc. v. South Carolina Dept. of Revenue*, 399 S.C. 313, 731 S.E.2d 869, 872, n.2 (2012).

The standard of review for questions of law is *de novo*. The appellate courts "may reverse where the decision is affected by any error of law." *Murphy v. Owens Corning*, 393 S.C. 77, 710 S.E.2d 454, 457 (Ct. App. 2011). The appellate courts are "free to decide matters of law with no particular deference to the fact finder." *Id*.

ARGUMENTS

I. Because the parties filed cross motions for summary judgment, the Appellants are precluded from arguing on appeal that there exist genuine issues of material fact in dispute to reverse the summary judgment entered by the trial court.

This case came before the trial court on the cross motions for summary judgment filed by both the Appellants and the Respondents. The law governing cross motions for summary judgment is clear. As the Supreme Court has explained, "[w]hen parties file cross-motions for summary judgment, the issue is decided as a matter of law." *United States Auto. Asso. v. Pickens*, 434 S.C. 60, 862 S.E.2d 442, 444 (2021). Moreover, it is well established that "[w]here cross motions for summary judgment are filed, the parties concede the issue before us should be decided as a matter of law." *Buonaiuto v. Town of Hilton Head Island*, 440 S.C. 144, 889 S.E.2d 625, 630 (Ct. App. 2023). Indeed, the Supreme Court has confirmed that "the parties filed cross motions for summary judgment, thereby indicating the parties' belief that further development of the facts was unnecessary." *Alltel Communications, Inc. v. South Carolina Dept. of Revenue*, 399 S.C. 313, 731 S.E.2d 869, 872, n.2 (2012).

Therefore, by filing cross motions for summary judgment, the parties, including the Appellants, have conceded that the issues before the trial court may be decided as a matter of law. More specifically, the Appellants have conceded that further development of the facts is not needed. Nonetheless, on appeal, the Appellants have now backtracked from those very concessions which should remain binding upon them on appeal. In their opening brief, the Appellants contend, for instance, that their "claims of negligence and abuse of process present genuine issues of material fact." *See*, Appellants' Brief, p. 10. Similarly, they insist that "[t]he question of whether the actions of Respondents RCSD and Deputy Signorino amount to a failure to exercise reasonable care is a

factual determination that should be resolved by a jury, not on summary judgment." *See*, Appellants' Brief, p. 10. Yet, those very arguments are diametrically inconsistent with the Appellants' filing and prosecution of their own cross motion for summary judgment. In short, the Appellants should be precluded from arguing that genuine issues of material fact exist which preclude the summary judgment entered by the trial court. In effect, with the parties' filing of the cross motions for summary judgment, the trial court was correct in concluding that the motions presented issues of law to be decided and that further factual development was not required. Any argument that summary judgment should be reversed for the existence of genuine issues of material fact should be soundly rejected.

II. The Appellants' issues on appeal should be deemed abandoned or conceded because the Appellants present those issues only in a conclusory manner and without the citation of any supporting authorities.

The appeal of the trial court's order should also be treated as abandoned or conceded based on the rule of appellate procedure articulated in *Fields v. Melrose Limited Partnership*, 312 S.C. 102, 439 S.E.2d 283, 285, n.3 (Ct. App. 1993), where this Court counseled that "an issue is deemed abandoned on appeal, and therefore, not presented for review, if it is argued in a short, conclusory statement without supporting authority." 439 S.E.2d at 285, n.3. *See also*, *Glasscock, Inc. v. United States Fidelity & Guaranty Co.*, 348 S.C. 76, 557 S.E.2d 689 (Ct. App. 2001) (same).

While the Appellants include four separate sections in their opening brief, each of the issues or points raised is presented in a short, conclusory manner. The issues tend to be duplicative or redundant and are stated without any substantive legal analysis. Moreover, the Appellants do not cite to any supporting case law nor other authorities in arguing that the trial

court erred in granting summary judgment to the Respondents RCSD and Signorino. Thus, on this additional basis, the trial court's order should be affirmed.

III. The trial court's order granting summary judgment to the Respondents should be affirmed because the Appellants have failed to appeal each of the separate grounds for summary judgment found by the trial court, and hence, the appeal is barred by application of the "two-issue rule."

Additionally, the trial court's order granting summary judgment to the Respondents RCSD and Signorino should be affirmed on the basis of the "two-issue" rule. In applying the "two-issue" rule, the Supreme Court has explained that "where a decision is based on more than one ground, the appellate court will affirm unless the appellant appeals all grounds because the unappealed ground will become the law of the case." *Jones v. Lott*, 387 S.C. 339, 692 S.E.2d 900, 903 (2010). Similarly, in *Folkens v. Hunt*, 290 S.C. 194, 348 S.E.2d 839 (Ct. App. 1986), this Court held that "[a]n alternative ruling of a lower court that is not excepted to constitutes a basis for affirming the lower court and is not reviewable on appeal." 348 S.E.2d at 845.

As discussed above, the Appellants alleged causes of action for intentional infliction of emotional distress, abuse of process, malicious prosecution, negligence, and breach of fiduciary duty. In its order, the trial court granted summary judgment to the Respondents on a number of separate and legally distinct defenses. Specifically, the trial court found that the Appellants' causes of action are barred by three immunity defenses under the Tort Claims Act, which exclusively governs all claims for torts committed by a governmental employee. *See*, S.C. Code Ann. § 15-78-200. Those immunity defenses include Section 15-78-60(4) immunity for the failure to enforce the law including statutory law, Section 15-78-60(6) immunity for the failure to protect and for the methods of providing police protection, and 15-78-60(23) immunity for the institution of judicial

proceedings. (R. 4-7). In addition to the immunity defenses, the trial court ruled that the Respondent Signorino is entitled to absolute employee immunity under Section 15-78-70(a) for her conduct which was found to be within the scope of her official duties and for the absence of any evidence of actual fraud, actual malice, intent to harm, or a crime of moral turpitude. (R. 7).

The trial court also included two additional dispositive rulings. First, the trial court found that the allegations of negligence should appropriately be treated as allegations of negligent misrepresentation, and the court concluded that such claims are also barred as erroneous representations of matters of law. (R. 2-3).[2] Second, the trial court ruled that the Respondent Signorino is entitled to immunity under Section 63-7-390, which states: "A person required or permitted to report pursuant to Section 63-1-310 or who participates in an investigation or judicial proceedings resulting from the report, acting in good faith, is immune from civil and criminal liability which might otherwise result by reason of these actions. In all such civil or criminal proceedings, good faith is rebuttably presumed." *See*, S.C. Code Ann. § 63-7-390. (R. 8).

Additionally, as to the cause of action for intentional infliction of emotional distress (which is also known as the tort of outrage), the trial court recognized that the definition of "loss" contained in the Tort Claims Act specifically excludes "the intentional infliction of emotional harm." *See*, S.C. Code Ann. § 15-78-30(f). The trial court ruled that the Respondents are entitled to summary judgment on that claim. (R. 3). Moreover, the trial court cited the recent decision in *Gore v. Dorchester County Sheriff's Department*, 442 S.C. 438, 900 S.E.2d 423 (2024), where the Supreme Court held that "there is no separate cause of action in South

[2] *See*, *Quail Hill, LLC v. Richland County*, 387 S.C. 223, 692 S.E.2d 499, 508 (2010) (where the Supreme Court determined that the plaintiff's negligence claim "should be treated as solely one for negligent misrepresentation"); *Carolina Chloride, Inc. v. Richland County*, 394 S.C. 154, 714 S.E.2d 869, 875 (2011) ("no action will generally lie for a misrepresentation as to a matter of law").

Carolina for the reckless infliction of emotional distress." 900 S.E.2d at 424. The Supreme Court further ruled that "[t]he bar to recovery for intentional infliction of emotional distress in section 15-78-30(f) applies to the subset of claims for the reckless infliction of emotional distress." 900 S.E.2d at 426. (R. 3).

As a close review of the Appellants' opening brief and the statement of issues raised on appeal demonstrates, the Appellants did not appeal the vast majority, if any, of the bases for summary judgment found meritorious by the trial court. Indisputably, the Appellant has not appealed the dismissal of the Respondent Signorino based on Section 15-78-70(a) employee immunity or good faith immunity under Section 63-7-390. There is no mention in the Appellants' opening brief of those Code sections or defenses. Thus, the dismissal of Respondent Signorino most certainly should be affirmed. There is likewise no doubt that the Appellant did not appeal the dismissal of the intentional infliction of emotional distress cause of action.

The Appellants also did not appeal the dismissal of the allegations of negligent misrepresentation or the breach of fiduciary duty claim. There is no mention of those rulings in the Appellants' opening brief, and hence, the dismissal of those claims should be affirmed.

Finally, as for the three immunity defenses under Section 15-78-60, the Appellants make no mention in their brief of Section 15-78-60(23). Likewise, the Appellants do not contest the dismissal of their malicious prosecution claim. Thus, the dismissal of that claim should be affirmed. The Appellants do, however, appear to take limited exception to two of the immunity defenses, specifically Sections 15-78-60(4) and 15-78-60(6); yet, as discussed below, their challenge is limited to the flawed assertion that those immunity provisions are subject to gross negligence exceptions. However, because the Appellants have failed to appeal the favorable ruling for the Respondents on the myriad of other defenses, including the Section 15-78-60(23)

immunity defense and the Section 63-7-390 immunity defense, the Appellants should be precluded by the "two-issue rule" from pursuing any of their grounds for appeal. In short, the Appellants' appeal is barred by application of the "two-issue rule."

IV. The Appellants are in error in arguing that Section 15-78-60(4) and Section 15-78-60(6) include gross negligence exceptions.

As stated above, the Appellants contend, in a conclusory manner and without citing any supporting authority, that Section 15-78-60(4) immunity and Section 15-78-60(6) immunity are subject to a gross negligence exception. Not surprisingly, the Appellants cite no authority for that position. Section 15-78-60(4) provides absolute sovereign immunity for the "adoption, enforcement, or compliance with any law or failure to adopt or enforce any law, whether valid or invalid, including, but not limited to, any charter, provision, ordinance, resolution, rule, regulation, or written policies." S.C. Code Ann. § 15-78-60(4). There is no gross negligence exception included in the language of Section 15-78-60(4). Likewise, Section 15-78-60(6) provides: "The governmental entity is not liable for a loss resulting from ... (6) civil disobedience, riot, insurrection, or rebellion or the failure to provide the method of providing police or fire protection." S.C. Code Ann. § 15-78-60(6). Again, there is no gross negligence exception to Section 15-78-60(6). Thus, the immunity under those provisions is applicable to both negligence and gross negligence theories, as well as, for that matter, to other tort theories of liability.

Importantly, however, the Appellants have made no argument that the conduct by the Respondent Signorino rises to the level of gross negligence. In fact, the Appellants have pointed to no evidence in the record that required the trial court to rule as a matter of law that the conduct

by the Respondent Signorino constitutes gross negligence. Consequently, the basic premise of the Appellants' appeal – that Section 15-78-60(4) immunity and Section 15-78-60(6) immunity are precluded upon a showing of gross negligence – is not a correct proposition under South Carolina law, and the Appellants have not cited even a single case to support that premise. On this additional basis, the summary judgment entered for the Respondents should be affirmed.

V. The trial court was correct in concluding that the Section 15-78-60(4) and Section 15-78-60(6) immunity defenses applied to the Appellants' allegations regarding the actions taken by the Respondents Richland County Sheriff's Department and Signorino.

As indicated, the Appellants' only challenge to the Section 15-78-60(4) and Section 15-78-60(6) immunity defenses is based on a non-existent gross negligence exception. The Appellants do not, however, challenge the trial court's ruling that the Section 15-78-60(4) and Section 15-78-60(6) immunity defenses apply to the Appellants' allegations. Nonetheless, for the sake of completeness, the Respondents will address the trial court's rulings as to those two immunity defenses.

A. S.C. Code Ann. § 15-78-60(4)

Section 15-78-60(4) provides absolute sovereign immunity for the "adoption, enforcement, or compliance with any law or failure to adopt or enforce any law, whether valid or invalid, including, but not limited to, any charter, provision, ordinance, resolution, rule, regulation, or written policies." S.C. Code Ann. § 15-78-60(4). As the trial court concluded, the Respondents are entitled to sovereign immunity for any alleged failure to enforce any law including statutes pertaining to emergency protective custody. (R. 5).

In the leading case of *Adkins v. Varn*, 312 S.C. 188, 439 S.E.2d 822 (1993), the Supreme Court explained that "[t]he provisions of Section 15-78-60(4) are clear and unambiguous on their face, and are not subject to judicial interpretation. The statute clearly exempts from liability any loss resulting from the failure to enforce an ordinance." 439 S.E.2d at 824. In *Adkins*, the estate of a thirteen-year-old bicyclist presented evidence that the decedent was killed when she was chased by several vicious dogs into a public street where she was struck and killed by an automobile. The facts showed that Greenville County had prior notice of these vicious dogs in the neighborhood but did not enforce the animal control laws on those animals. Thus, the dogs were allowed to remain at large. In affirming summary judgment by the trial court, the Supreme Court absolved Greenville County from liability in accordance with Section 15-78-60(4) for failing to enforce animal control ordinances. The Supreme Court concluded that "[t]he statute clearly exempts from liability any loss resulting from the failure to enforce an ordinance, and therefore, the County is immune from suit for any loss as a result of their non-enforcement of the animal control ordinance." *Id*.

In the case at bar, the trial court similarly ruled that the Respondents are entitled to absolute immunity for any alleged failure to enforce the statutes pertaining to emergency protective custody. Thus, the alleged failure to enforce such laws is barred by absolute sovereign immunity under Section 15-78-60(4).

B. S.C. Code Ann. § 15-78-60(6)

Section 15-78-60(6) provides: "The governmental entity is not liable for a loss resulting from ... (6) civil disobedience, riot, insurrection, or rebellion or the failure to provide the method of providing police or fire protection." S.C. Code Ann. § 15-78-60(6). In *Wells v. City of*

Lynchburg, 331 S.C. 296, 501 S.E.2d 746 (Ct. App. 1998), this Court recognized that a scrivener's error resulted in the omission of the word "or." After looking at the legislative history, this Court concluded that sovereign immunity under Section 15-78-60(6) extends to "the failure to provide or the method of providing police or fire protection." 501 S.E.2d at 750.

In the 2006 case of *Huggins v. Metts,* 371 S.C. 621, 640 S.E.2d 465 (Ct. App. 2006), this Court affirmed summary judgment for the Lexington County Sheriff based upon Section 15-78-60(6) in a case where a suspect was shot by law enforcement. This Court explained that the Tort Claims Act "specifically exempts the Police from liability concerning the methods which they choose to utilize to provide police protection." 640 S.E.2d at 467.

Later, in *Shelley v. South Carolina Highway Patrol*, 432 S.C. 335, 852 S.E.2d 220 (Ct. App. 2020), this Court applied Section 15-78-60(6) in affirming a directed verdict in a failure to protect case. The plaintiff alleged that a highway patrol officer should have protected the decedent from harm that resulted when he was struck and killed by a vehicle on an interstate highway. This Court agreed that the plaintiff's allegations were "derivative of the notion" that the officer should have protected the decedent from harm. This Court then ruled as a matter of law that "the Estate's claims were precluded by subsection 15-78-60(6)." 852 S.E.2d at 225.

That immunity provision of the Tort Claims Act is similarly applicable to this case. Section 15-78-60(6) includes within its scope conduct where law enforcement chooses or employs particular methods or approaches to addressing an issue that is presented. In the case at bar, the Respondent Signorino was faced with providing police protection to Ainsley Wallas, who had been a runaway. As the trial court explained, the litigation involved "Signorino's various methods in protecting Ainsley from an allegedly abusive situation, including conducting interviews, performing a background investigation, and, according to the Plaintiff, ultimate

removal of the child from (what appeared to be in) harm's way." (R. 6). The Appellants are primarily critical as to the methods that Signorino employed and the ultimate decisions she made in providing police protection to the minor under the prevailing circumstances. As the trial court correctly concluded, "any actions and/or inactions on the part of Signorino or any Sheriff's employee – whether negligent or not – fall squarely within the purview of § 15-78-60(6)." (R 6). The trial court's ruling made as a matter of law was correct and should be affirmed on the merits and for each of the other reasons discussed herein.

CONCLUSION

Based on the foregoing discussion and analysis, the Respondents Richland County Sheriff's Department and Casey Elizabeth Signorino respectfully request that this Court affirm the Order issued by Circuit Court Judge Diane S. Goodstein granting them summary judgment and dismissing the Appellants' claims with prejudice.

Respectfully submitted,

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September 2, 2025

CERTIFICATE OF COUNSEL

The undersigned counsel for the Respondents certifies that the Final Brief of Respondents complies with Rule 211(b), SCACR.

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September 2, 2025

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CERTIFICATE OF COMPLIANCE

The undersigned counsel for the Respondents certifies that the Final Brief of Respondents complies with the Supreme Court's Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings, issued April 15, 2014.

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September 2, 2025

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court's Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of Lindemann Law Firm, P.A., counsel for the Respondents does hereby certify that service of the **Final Brief of Respondents** was made upon all counsel of record by email only this the 2nd day of September 2025, as follows:

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RE: Lisa Wallas v. Richland County Sheriff's Department and Casey Elizabeth Signorino
Appellate Case Number: 2024-001940
Civil Action Number: 2021-CP-40-1484

Lisa Wallas, as Natural Guardian of A.W., Minor Child, v. Richland County Sheriff's Department, South Carolina Department of Social Services, Richland County Department of Social Services, and Casey Elizabeth Signorino
Civil Action Number: 2021-CP-40-1971
Claim Number: Risk Management
Our File Number: 314.20777

Dear Ms. Kitchings:

Pursuant to Section (b)(2)the Supreme Court's Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), please find enclosed for filing the **Final Brief of Respondents** with regard to the above referenced appeal. By copy of this letter, I am serving copies on all counsel of record by email only pursuant to Section (d)(1) of the same Supreme Court Order.

The hard copy is being hand delivered to the Court on today's date. If you have any questions, please advise. Thank you for your assistance.

LINDEMANN LAW FIRM, P.A.

Andrew F. Lindemann

AFL/jac
Enclosure

cc: S. Jahue Moore, Esquire *(w/ Enclosure, Via Email Only)*
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