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**Feb 17 2026**

**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

The Honorable Jennifer B. McCoy, Circuit Court Judge

Case No. 2023-CP-10-01923, Appellate Case Number 2025-002480

JEFFREY CEPIN,..... Appellant,

v.

SAMET CORPORATION; METROMONT CORPORATION

n/k/a METROMONT, LLC,..... Respondents.

MOTION FOR TRANSCRIPT CORRECTION Case Number 2025-002480

I, Jeffrey Patrick Cepin Appellant, am requesting a transcript correction. The Charleston County South Carolina Court of Common Pleas Court Transcript I, Jeffrey Patrick Cepin received, from, the September 02nd, 2025, Judge Jennifer B. McCoy’s Court Room, Case Number 2023-CP-10-01923 is incorrect an a false narrative of the spoken words on the official court record as well as, an attempt to depict me, Jeffrey Patrick Cepin as a person unable to communicate a complete sentence.

Here is my, Jeffrey Patrick Cepin’s Corrections to the LEGAL EAGLE, Charleston County South Carolina Court Of Common Pleas, Judge Jennifer B. McCoy Court Transcript for Case Number 2023-CP-10-01923 on September 02nd, 2025.

- Page 2: lines 13, 14, 15, 16, is incorrect. (William R. Padget, Esquire was a former attorney for plaintiff, Jeffrey Patrick Cepin.)
- Page 4: line 8 (Metromont LLC chosen attorney’s name is incorrectly spelled as Michael Task. Correct spelling is Michael Trask)
- Metromont LLC chosen attorney’s name is Misspelled throughout the whole Legal Eagle court transcript of the September 02nd, 2025 Charleston County South Carolina Circuit Court of Judge Jennifer B. McCoy, case number 2023-CP-10-01923. Correct Spelling of Metromont LLC chosen attorney’s name is Michael Trask, From this point on I, Jeffrey Patrick Cepin will not mention the mistake but ask you to refer to this statement for proper identification of inaccuracy in this specific Legal Eagle court transcript Case Number 2023-CP-10-01923 from Judge Jennifer B. McCoy’s Circuit Court in Charleston County South Carolina on September 02, 2025.

- Page 4: Between lines 13, 14 defendant Mike Trask words and statements were deleted as he, Mike Trask returned from running out of the court room.
- Page 4: Lines 20, 21, 22 have deleted words and are incorrect. (Specific party names and speaking order have been deleted, as well as,)
- Page 5: Lines 14, 15 have inaccurate wording of what I, Jeffrey Patrick Cepin Said. (I, Jeffrey Patrick Cepin said I, Jeffrey Patrick Cepin do not have a memory of the accident.)
- Page 5: lines 22, 23, 24, 25 have deleted statements and wording is incorrect. I, Jeffrey Patrick Cepin Said, Starting after clarifies that. (The defendants attorney Mike Trask statement is false. There are no Solid Steel Beam involved in the construction, building of one of these parking garages. I, Jeffrey Patrick Cepin know this due to my, Jeffrey Patrick Cepin's years of work experience actually constructing these parking garages and the photos taken of the accident site debris broken concrete pieces. )
- Page 8: lines 9,10 are inaccurate. Metromont LLC attorney Mike Trask said (handing over paperwork and documents or just simple not how thing are done.)
- Pages 4, 5, 6, 7, 8:there are deleted statements from Metromont LLC Attorney Mike Trask that were claimed to be spoken by Samet Corporation Attorney Mr. Gruber on pages 23, 24.
- (Page 23: lines 7, 8, 9, 10, 11, 12, 23, 24, 25 were Metromont LLC Attorney Mike Trask said statements.
- (Page 24: lines 1, 2, 3, 4, 5, were Metromont LLC Attorney Mike Trask said statements said statements.
- Page 9: lines 10, 11, 12, 13, deleted words and incorrect wording of my, Jeffrey Patrick Cepin Statement. I, Jeffrey Patrick Cepin said ( I, Jeffrey Patrick Cepin haven't had any request for a deposition and still to this day haven't had a request for a deposit to be taken by separate unique individual Employer Identification Number Samet Corporation to even ask a single question. )
- Page 9: line 23 specific dates were deleted. I, Jeffrey Patrick Cepin Said specific date of March 8, 2024 and June 17th, 2024 the Defendants motion for Summary Judgment of Statutory Employee was denied.)
- Page 10: line 3 deleted words. I, Jeffrey Patrick Cepin Said ( both defendants claimed they never had the time to even attempt a deposition or question me, Jeffrey Patrick Cepin.)
- Page 10: lines 10, 11, 12 deleted words. I, Jeffrey Patrick Cepin said ( you said you, would give your verdict on this Summary Judgment. )
- Page 10: line 12, 13, 14, 15, 16 incorrect wording. I, Jeffrey Patrick Cepin Said (Now back to when I was at the first deposition. The defendants stated asking completely irrelevant questions to the Summary Judgment for Statutory Employee submitted on March 08th, 2024 and June 17th, 2024. The questions personal about my family and irrelevant to my, Jeffrey Patrick Cepin's occupation solely as a welder.)

- Page 10: line 19, 20, 21, deleted words and incorrect wording. I, Jeffrey Patrick Cepin said ( about my occupation or a matter relevant to the Statutory Employee Summary Judgment filed on March 08th, 2024 and June 17th, 2024 Metromont LLCs attorney ended the deposition.)
- Page 10: line 22 deleted words I, Jeffrey Patrick Cepin said ( and ended the deposition as well.)
- Page 11: line 5 deleted word I, Jeffrey Patrick Cepin said ( claim my, objection to that question.)
- Page 11: line 12, 13 deleted words and incorrect Wording. I, Jeffrey Patrick Cepin said ( extremely falsified and out of sequence , order to how the Metromont LLC lawyer was asking.)
- Page 11: line 18 deleted words. I, Jeffrey Patrick Cepin said ( Judge Jessica A. Salvini not she)
- Page 11: line 20 incorrect wording I, Jeffrey Patrick Cepin said ( to sit through another Deposition. )
- Page 11: line 24, 25 incorrect wording deleted words. I, Jeffrey Patrick Cepin Said ( Now this is after the close of discovery deadline date of March 15th, 2025 given in the verdict on November 12th, 2024 from Judge McCoy gave.)
- Page 12: line 12 deleted words incorrect wording. I, Jeffrey Patrick Cepin said (18th of July 2025 and Samet Corporation was on the 21st of July 2025. )
- Page 12: line 17 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( and chopped up answers and questions and I have.)
- Page 13: lines 1, 2, 3, 4, 5 incorrect statements in the sequence of this trials proceedings. added statements from page
- page 13: lines 9, 10, 11 incorrect wording. I, Jeffrey Patrick Cepin said ( and that the Deponent has been given the opportunity to read and correct the deposition. That statement is completely false.)
- Page 13: line 13 incorrect wording. I, Jeffrey Patrick Cepin said ( weeks, the deposition would not be ready)
- Page 13: line 18, 19, 20 incorrect wording. I, Jeffrey Patrick Cepin said ( be compelled to answer irrelevant questions, in the first deposition and that deposition was thrown out on March 31st, 2025 by Judge Jessica A. Salvini from an improper submission of the deposition. I)
- Page 13: line 23 incorrect wording. I Jeffrey Patrick Cepin said ( that I, Jeffrey Patrick Cepin would not, as I represent myself, Jeffrey Patrick Cepin
- Page 13: line 24 deleted words. I, Jeffrey Patrick Cepin said ( would not waive my rights to see

the deposition or make sure that)

- Page 14: lines 3, 4, 5, incorrect wording deleted words. I, Jeffrey Patrick Cepin said (next to the stenographer statements. I, Jeffrey Patrick Cepin would say that the Samet Lawyers questions have been chopped up and altered as well as, my answers to such question and questions were added.
- Page 14: line 6, 7, deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( the Samet Corporation Lawyer questions started here on page 45 line 22. Now, let me just get this correct and straight. The Samet Corporation Lawyer questions specific to safety.
- Page 14: line 12 deleted words. I, Jeffrey Patrick Cepin said (questions by Metromont LLCs lawyer and not at that time but at the time when Metromont LLCs was actually asking questions.
- Page 14: line 14 deleted words incorrect wording. I, Jeffrey Patrick Cepin said (was no back and forth or off the record discussion between the Samet Corporation lawyer and the Metromont LLC lawyer during the Samet)
- Page 14: line 19 incorrect wording. I, Jeffrey Patrick Cepin said (my correction the Question is completely wrong.)
- Page 14: line 20 incorrect statement added deleted wording false narrative.
- Page 14: lines 21, 22, 23 incorrect wording. I, Jeffrey Patrick Cepin said ( Samet Corporation lawyer questioning started on page 45 which is a couple of pages south of where this deposition has his questions started.)
- Page 15: lines 1, 2, 3, 4, 5, deleted words, deleted statements answers and incorrect wording. I, Jeffrey Patrick Cepin said ( being questioned by Metromonts LLC Lawyer you said it was Davis Erecting's formans responsibility for the entire job sites safety. My, Jeffrey Patrick Cepin's answer to the Samet Corporations Question was No, that was not the question or answer asked and given to the Metromont LLC Lawyer. The Metromont LLC lawyer asked about Davis Erecting Forman being in charge of inspections for the entire job site. My answer to the Metromont Lawyer questions to entire job site inspection is that it was Samet Corporations Contracted job for entire job site inspections it's what Samet Corporation gets paid for. The Samet Corporation lawyer added the Samet Corporation Name, Metromont LLC Name)
- Page 15: lines 24 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( my correction there's another chopped up question in that question.)
- Page 16: line 1, 2, 3, 4 statements moved from proper sequence in trial proceedings deleted words incorrect wording. Mike Trask said I object I did not alter the deposition. Mr. Gruber then said I did not alter the deposition either.
- I, Jeffrey Patrick Cepin then said something similar to page 16: lines 19, 20, 21, 22. I Jeffrey Patrick Cepin said ( now, Metromont LLC Lawyer and Samet Corporation Lawyer just sat there and said they didn't alter anything on the deposition yet still submitted a false Deposition to the

court.

- Then Metromont Lawyer said what is on page 23: lines 18, 19, 20
- Then Mr. Gruber said the deposition is correct there is nothing altered in it.
  
- Page 16: lines 17, 18 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( responsibility. My answer to the question is actually on page 23. It's Samet Corporation contracted duty for job site safety.
  
- Page 16: lines 19, 20, 21, 22 have already been corrected.
  
- Page 16: lines 23, 24, 25 statement did not happen
  
- Page 16: statement missing from me, Jeffrey Patrick Cepin motioning the Court to dismiss the defendants Metromont LLC & Samet Corporation second Summary Judgment for product liability and negligence after the close of discovery on March 15th, 2025. Both Defendants both submitted A Summary Judgment 40 days after the close of discovery order by Judge McCoy for a motion completely different from the original Summary Judgment for statutory employee. (Metromont LLC changed there motion in court on May 05th, 2025 from Summary Judgment statutory employee to Product liability and Samet Corporation changed their Motion in Court on June 27th, 2025 from Summary Judgment statutory employee to Summary Judgment negligence. The law states motions can only be changed up to 30 days after the close of discovery witch Judge McCoy set a dead line of March 15, 2025 and that was for the specific filing of Summary Judgment statutory employee by both defendants.
  
- Page 17: line 1, statement did not happen
  
- Page 17: Line 13, 14 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( guess we'll get into it that I did submit evidence 10 Photos and Documents when we first filed the case for Personal injury 3rd party lawsuit back in 2022 and again with Judge Rhode and the court. The documents included corporations in the same Prestressing precast concrete business. Safety originations, inspection organizations, FEMA, South Carolina permitting Laws, Charleston County South Carolina permitting paperwork, blueprints, international building code paperwork, rebar companies, concrete inspection equipment companies, concrete Construction Engineer statements and more etc... I, Jeffrey Patrick Cepin did not pay or have to pay anyone for these documents and information.)
  
- Page 17: line 18 incorrect wording. I, Jeffrey Patrick Cepin said ( said Metromont LLC in their claim submitted on the 18th of July 2025)
  
- Page 17: lines 23, 24, 25 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( see in the Metromont LLC Filing on the 18th of July 2025 just a few lines down that this statement is false. I, constantly said I, Jeffrey Patrick Cepin don't have a memory of the accident due to the traumatic brain injury I sustained from this accident. The Metromont Lawyer is even telling the court I told the Metromont lawyer I, don't have a memory of the accident due to the traumatic brain injury amnesia.

- Page 18: line 11 incorrect Wording. I, Jeffrey Patrick Cegin said ( how, I, Jeffrey Patrick Cegin am an expert in this specific subject.)
- Page 18: lines 15, 16 deleted words. I Jeffrey Patrick Cegin said ( I went to school for multiple occupations under the construction subject and have multiple certifications.
- Page 18: lines 17, 18, 19 incorrect wording deleted wording. I, Jeffrey Patrick Cegin said (in court on the 12th of November 2024 the defendants Metromont and Samet Corporation both agreed in court for Summary Judgement for Statutory Employee with you Judge McCoy that I went to school for construction.
- Page 19: 1, 2, 3 incorrect wording. I, Jeffrey Patrick Cegin said ( against Samet Corporation for their participation in the accident on May 01st, 2021. Because Samet Corporation has just a few more and different documents regarding this subject.)
- Page 19: line 6, 7 deleted words incorrect wording. I, Jeffrey Patrick Cegin said ( multiple inner components missing including metal rebar, metal wire mesh, metal stirrups, metal strands which are the laws and standards in the state of South Carolina a company has to legally obey in order to legally manufacture a Prestressing precast concrete construction business.)
- Page 19: line 9 added words (hit here)
- Page 19: lines 12, 13, 14, 15, 16, 17deleted words incorrect wording. I , Jeffrey Patrick Cegin Said (page 3 of that document it states that they are using the International Building Code requirements for the construction for a parking structure with Prestressed Precast Concrete Double T's. The International building code comes from the International Code Council who creates Laws and Standards construction companies must obey in this whole country of The United States of America.
- Page 19: line 18 is a false statement
- Page 19: line 21 is a false statement
- Page 19: line 23, 24, 25deleted words incorrect wording. I, Jeffrey Patrick Cegin said ( it's from the South Carolina Labor, Licensing and Regulations website. One moment , I believe there are about six pages of it stating how the state of South Carolina Adopts the International Building Code every year from the International Code Council and the state of South Carolina obeys the standards and regulations required by the International Building Code.)
- Page 20: lines 1, 2 were corrected on page 19
- Page 20: line 3 and that one is three pages long is misplaced statement belong on page 19 in between lines 21 and 25
- Page 20: lines 3, 4, 5, 6 deleted words. I, Jeffrey Patrick Cegin said ( So these are Not standards, regulations that both defendants Metromont LLC and Samet Corporation don't know about. I

know about it. Anyone in the business of constructing buildings or construction material has to be licensed, and know about the standard to build them.)

- Page 20: lines 7, 8, 9, 10, 11, 12, 13 14, 15 deleted words incorrect wording. I, have it stared. The South Carolina Labor and Licensing Regulations website, states that each year South Carolina adopts the The International Building Code after the International Code Council meeting.
- Page 20: lines 16, 17, 18, 19 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( so that proves that with these documents here that I'm showing the court and my personal knowledge, years of work experience and Photos proves my, Jeffrey Patrick Cepin claim true that the improper incorrect manufacturing of the Prestressed Precast Concrete Double T's participated in the accident on May 01, 2020 in Charleston County South Carolina that left me with sustained injuries.
- Page 20: line 23 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( reinforcement. It's on page Four and it shows the top of a prestressed precast concrete double T.)
- Page 21: line 6 deleted words. I, Jeffrey Patrick Cepin said ( to International Building Code Standards.)
- Page 21: line 10 deleted words. I, Jeffrey Patrick Cepin said ( so now this is the bare minimum metal reinforcement that could be used wire metal mesh and I showed where photos of this were in the evidence I , Jeffrey Patrick Cepin Submitted to the court.)
- Page 21: lines 19, 20, 21, deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( photo number 2 which is this one here if you look at the photo you do not see any of the top flange metal reinforcement wire metal mesh in the pile of concrete rubble in the photo.
- Page 21: line 22, 23, deleted words incorrect wording. I, Jeffrey Patrick Cepin said (Photo number 3 goes even closer where you just see pieces of concrete and no metal reinforcement.)
- Page 21: line 25 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( long strands which go the whole distort the prestressed precast concrete double T, which)
- Page 22: line 1 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( is 60 foot. these are 60 foot prestressed precast concrete double T's which were involved in the accident on May 01st, 2020 which left me Jeffrey Patrick Cepin with multiple sustained injuries. In that same
- Page 22: line 5 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( brings up a 60 foot prestressed precast concrete double T)
- Page 22: lines 7, 8, 9, 10, 11, 12 deleted words incorrect Wording. I Jeffrey Patrick Cepin said ( at the bottom of the chart it shoes sample span feet and says for a 60 foot long prestressed precast concrete Double T. there should be 16 of these very long metal strands in each one of those prestressed precast concrete double T stems which are used to prestress the prestressed precast concrete double T. So that makes 32 of these metal strands in one of these prestressed

precast concrete double T's

- Page 22 line 13 deleted words incorrect wording. I, Jeffrey Patrick Cepin said ( Now as you can see from the photos there are 4 levels of this parking structure that collapsed. This would mean four (4) prestressed precast concrete double T's were improperly incorrectly manufactured and involved in the May 01st, 2020 accident leaving me permanently disabled brings the total number of metal strands in the concrete debris to over 100 and you don't see any none on one whole side of the concrete debris.
- Page 22: line 23 deleted wording incorrect wording I, Jeffrey Patrick Cepin said ( against the defendants, explaining the documents)
- Page 22: line 24 false narrative added statement
- Page 22: line 25 false narrative Judge McCoy asked for Samet Corporation lawyer to speak his case.
- Page 23: line 4 added words Mr. Gruber said very simple.
- Page 23: lines 5, 6 were added Mr. Gruber did not say any of that.
- Page 23: line 8 words added. Mr. Gruber did not say in discovery nor did Mike Trask.
- Page 23: lines 7, 8, 9, 10, 11, 12 were statements from Mike Trask Metromonts lawyer Mr. Gruber did not say that.
- Page 23: lines 12, 13, 14, 15, 16 added wording Mr. Gruber said ( to the extent that Samet did not have a duty or obligation to inspect the panels. I don't even know how they could have inspected the product. On that note alone I am asking for the court to grant defendant Samet summary judgment.
- Page 23: lines 17, 18, 19, 20 were spoken by Mike Trask in the begging of the trial proceedings on page 16
- Page 23: lines 21, 22 were added Mr. Gruber did not say any of that.
- Page 23: lines 23, 24, 25 were not said by Mr. Gruber. The lines were said by Mike Trask in the beginning of the court proceeding where Mike Trask was giving Judge McCoy a event brief page 6, 7
- Page 24: lines 1, 2, 3, 4, were not said by Mr. Gruber they were lines or statements from Mike Trask on pages 6, 7
- Page 24: lines 5, 6, ,7, 8, 9, 10, 11 are false statements and were not spoken.

- Page 24: lines 17, 18, 19, 20: deleted words incorrect wording. I, Jeffrey Pactrick Cegin said ( excuse me, Your Honor. I, have Proof that, The Defendants Samet Corporation and Metromont LLC are withholding and refusing to show the proper documentation that's required by court and law which proves both the defendants had legal responsibilities and duties to inspect those incorrectly manufactured Precast Prestressed Concrete pieces.

The Judge ( Judge McCoy) then stoped me, Jeffrey Patrick Cegin from taking and would NOT let me, Jeffrey Patrick Cegin explain any more evidence or factual information regarding both defendants Samet Corporation and Metromont LLC participation in the Accident on May 01st, 2020, in Charleston County South Carolina, that caused me, Jeffrey Patrick Cegin, to be PERMANENTLY DISABLED.

I, Jeffrey Patrick Cegin I requesting the Appeals Court of South Carolina to accept my, Jeffrey Patrick Cegin's changes to the September 02nd, 2025 Charleston County South Carolina Circuit Court transcripts case number 2023-CP-10-01923 with Judge Jennifer B. McCoy as the truth, an over turn the decision of Judge Jennifer B. McCoy and DENIE, Both Defendants Samet Corporation and Metromont Corporation Summary Judgments. Thank You.

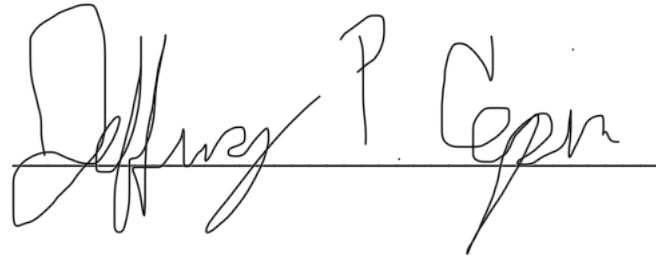
Jeffrey Patrick Cegin, February 17th, 2026.

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A handwritten signature in black ink that reads "Jeffrey P. Cegin". The signature is written in a cursive style and is positioned above a horizontal line.