

**MOTION CLAIM OF ERROR  
UNIVERSITY OF SOUTH CAROLINA**  
In The Court of Appeals

---

**RECEIVED**

FEB 27 2026

SC 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

---

**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.**

v.

Kamarah Reynolds-Hall

Appellant

---

**MOTION FOR CLAIM OF ERROR  
UNIVERSITY OF SOUTH CAROLINA**

---

Appellant comes now to ask the Honorable Court for a **MOTION FOR CLAIM OF ERROR UNIVERSITY OF SOUTH CAROLINA.**

The Case against the University of South Carolina consisted of **two (2) different claims with different Statute of Limitations.**

Courts will allow the valid claim to proceed. The lower Court should have awarded the Negligence Claim that was not time-barred.

The **PERSONAL INJURY CLAIM** was dismissed based on the Statute of Limitations being expired.

The **NEGLIGENCE CLAIM** is not time barred and had a 3-year Statute of Limitation.

**THE PERSONAL INJURY CLAIM** was dismissed because it was time-barred by the **supposedly two-year statute of limitation** under the South Carolina Tort Claims Act.

- 1) Date of Assault and Battery/ Assault by Mob: August 23, 2020.
- 2) Statute of Limitations from August 23, 2020 to August 23, 2023.
- 3) Case filed: August 23, 2023.

**DISCOVERY RULE FOR PERSONAL INJURY**

**With the Discovery Rule Applied for cause of action:**

- 4) New Date FOR Statute of Limitation Date would be October 2021-October 2023

**AWARD FOR PERSONAL INJURY: \$300,000.00**

---

**THE NEGLIGENCE CLAIM is not time barred and had a 3-year Statute of Limitation to be filed.**

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

- 1) **Assault and Battery/ Assault by Mob: August 23, 2020.**
- 2) **Case filed: August 22, 2023**
- 3) **Statute of Limitation Date: August 23, 2020 to August 23, 2023**

**AWARD FOR NEGLIGENCE: \$300,000.00**

**Appellant prays for the following**

1. For the Honorable Court to remand the case back to lower court for the **NEGLIGENCE CLAIM** for SC 15-3-530 (5).

Catherine Garbee Griffin  
3710 Landmark Drive, Suite 400  
PO Box 8057  
Columbia, South Carolina 29202  
803-799-9091

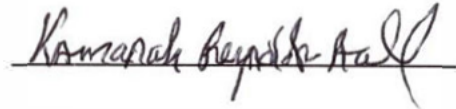
**Attorney for Holder Properties**

David DeMasters  
2838 Devine Street  
Columbia, South Carolina 29205  
803-799-9993

**Attorney for University of South Carolina**

Damon Christian Wlodarczyk  
PO Box 12009  
Columbia, South Carolina 29211

**Attorney for University of South Carolina**



Kamarah Reynolds-Hall  
5 Alatera Court  
Columbia, South Carolina 29229  
803-237-6057

**PRO SE**

**PROOF OF SERVICE**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Daniel Coble, Circuit Court Judge

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

University of South Carolina  
Holder Properties

Respondents,

v.

Kamarah Reynolds-Hall

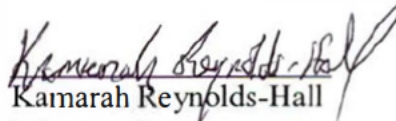
Appellant.

**PROOF OF SERVICE**

I certify that I have filed a **MOTION FOR CLAIM OF ERROR UNIVERSITY OF SOUTH CAROLINA** by depositing a copy of it in the United States Mail, postage prepaid, on April 10, 2025 addressed to the attorney of record for each defendant.

The attorneys of record for the **University of South Carolina** are David DeMasters PO Box 11412 Columbia, South Carolina 29211 and Damon Włodarczyk PO Box 12009 Columbia, South Carolina 29211. The attorney of record for **Holder Properties** Catherine Garbee Griffin

February 27, 2026

  
Kamarah Reynolds-Hall  
5 Alatera Court  
Columbia, SC 29229  
(803) 237-6057  
PRO SE

**RECEIVED**

FEB 27 2026

SC Court of Appeals