

JOEY C. REID

APPELLANT (PLAINTIFF)

v.

DENNIS KELLY OF THE GREENWOOD DETENTION CENTER

RESPONDENT (DEFENDANT)

CASE NUMBER: 2026-000968

NOTICE OF APPEAL

THE PLAINTIFF, JOEY C. REID, DOES HEREBY SUBMIT THIS NOTICE OF APPEAL IN REGARD TO C/A No.: 2023-CP-24-00259. ON OR ABOUT FEBRUARY 3, 2026 - WHILE AT THE GREENWOOD DETENTION CENTER, THE PLAINTIFF RECEIVED AND ORDER GRANTING SUMMARY JUDGEMENT FROM THE COURT OF COMMON PLEAS, ISSUED BY THE HONORABLE JUDGE PATRICK C. FANT, III. SUBSEQUENTLY, THE PLAINTIFF WAS TRANSFERRED TO CUSTODY OF THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS ON OR ABOUT FEBRUARY 11, 2026. DUE TO AGENCY RESTRICTIONS THAT PREVENT "INTAKE STATUS" IN MATES FROM ACCESS TO THE LAW LIBRARY AND LEGAL MATERIALS, THE PLAINTIFF'S INITIAL NOTICE OF APPEAL AND INCORPORATED MOTION FOR ENLARGEMENT OF TIME WAS ORIGINALLY FILED ON APRIL 3, 2026 AND THE APPELLANT WAS INSTRUCTED TO CORRECT DEFICIENCIES BY WAY OF THE INSTANT NOTICE OF APPEAL.

ASSIGNMENT OF ERROR

- 1) APPELLANT ASSIGNS THE FIRST ERROR WITHIN THE ORDER GRANTING SUMMARY JUDGEMENT, AS THE DECLARATION THAT APPELLANT'S CLAIM WAS "TIME-BARRED."
- 2) APPELLANT ASSIGNS THE SECOND ERROR WITHIN THE ORDER GRANTING SUMMARY JUDGEMENT, AS THE DECLARATION THAT "PROBABLE CAUSE BARS THE PLAINTIFF'S CLAIM."

DISCUSSION

PLAINTIFF'S COMPLAINT, ON ITS FACE, DECLARES THERE IS A GENUINE DISPUTE AS TO WHETHER A TIME-BAR TRULY EXISTS. PLAINTIFF'S INJURY DID NOT OCCUR UNTIL APRIL 21, 2021 AND THE COMPLAINT WAS FILED WITHIN TWO YEARS OF INJURY ON MARCH 21, 2023 - PURSUANT TO PROVISION OF THE S.C. TORT CLAIMS ACT.

ADDITIONALLY, THERE IS A GENUINE DISPUTE AS TO WHETHER PROBABLE CAUSE ACTUALLY EXISTED - WHICH IS A QUESTION OF FACT THAT SHOULD BE PRESENTED TO THE JURY FOR RESOLUTION. A MAGISTRATE'S ISSUANCE OF WARRANT, NOR INDICTMENT, ARE SUFFICIENT - IN AND OF THEMSELVES - TO SATISFY OR ESTABLISH ALL LAWFUL REQUIREMENTS OF PROBABLE CAUSE. AS THIS CONTENTIOUS ISSUE IS A MATTER OF LEGITIMATE DISPUTE, IT SHOULD BE VIEWED IN A LIGHT MOST FAVORABLE TO THE PLAINTIFF - SUCH REQUIREMENT NECESSITATES THIS QUESTION OF FACT TO BE RESOLVED BY JURY.

CONCLUSION

BASED UPON THE ABOVE- STATED FACTORS, THE PLAINTIFF HEREBY SUBMITS THIS NOTICE OF APPEAL.

APRIL 24, 2026  
COLUMBIA, SOUTH CAROLINA

RESPECTFULLY SUBMITTED,

5/ Joey C. Reid

Mrs. Jody C. Reid # 288142

Kirkland R/E Center A1/B-43

4344 Brusho River Road

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