

THE STATE OF SOUTH CAROLINA
In The 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.

Appellant Jeffrey Patrick Cepin Briefing Case Number [2025-002480](#)

Appeals Court of the State South Carolina, thank you for your time. I, Jeffrey Patrick Cepin Appellant, am submitting my, Jeffrey Patrick Cepin's briefing, in Appellant Case Number [2025-002480](#) from the South Carolina, Charleston County, Court of Common Pleas, Case Number 2023-CP-10-01923.

The reason I, Jeffrey Patrick Cepin am filing this appellant briefing is simple to the facts that The Charleston County South Carolina Court of Common Pleas and Judge Jennifer B. McCoy made a wrong ruling / verdict, granting both Defendants separate unique individual employer identification number Metromont Corporation n/k/a Metromont LLC and separate unique individual employer identification number Samet Corporation Summary Judgment in case number 2023-CP-10-01923 on December 09th, 2025.

Judge Jennifer B. McCoy made an improper verdict on December 09th, 2025, According to

South Carolina Law Rule 56 (C) Motions and Proceedings Thereon, as well as, all evidence I, Jeffrey Patrick Cepin submitted to the South Carolina Charleston County Court of Common Pleas case number 2023-CP-10-01923 especially on November 12th 2024, July 21st 2025 and September 02nd 2025.

Both Defendants Samet Corporation and Metromont Corporation n/k/a Metromont LLC have NOT submitted or filed one (1) single piece of evidence in this case number 2023-CP-10-01923 Displaying, showing that the Precast Prestressed Concrete Double T's involved in the sudden collapse of a parking garage (accident address: 997 Morrison Drive Charleston South Carolina 29403) that permanently disabled me, Jeffrey Patrick Cepin were manufactured and inspected to the Proper South Carolina, Charleston County Building Code Permitted Requirements.

On November 12th 2024, July 21st 2025 and September 02nd 2025 I Jeffrey Patrick Cepin Submitted Multiple Documents, Laws pieces of evidence, including, Photographs of the collapsed debris from the Precast Prestressed Concrete Double T parking garage On, May 01st, 2020 at accident site address 997 Morrison Drive Charleston South Carolina 29403. This evidence clearly showed the Precast Prestressed Concrete Double T's involved in the accident on May 01st, 2020 that permanently disabled me, Jeffrey Patrick Cepin were improperly manufactured WITHOUT the proper Building Code Required Metal Reinforcements. My, Jeffrey Patrick Cepin's expertise in this SPECIFIC Precast Prestressed Concrete Double T Construction, Reading Construction Drawings (blueprints) as well as, the individual experts in the evidence I, Jeffrey Patrick Cepin Submitted

(EVIDENCE: South Carolina Code of Laws Title 40 - Professions and Occupations Chapter 11 - Contractors Section [40-11-420](#). (A)(B)(Building Permits), International Code Council and State Adopted Construction Standards, International Building Code, Charleston County Special Inspection Procedure IBC Chapter 17 2021 Edition and Beaufort County Special Inspection Procedure IBC Chapter 17 2018 Edition, Diamond Contractors what are the Responsibilities of a General Contractor, #9 SAMET CORPORATION SITE SPECIFIC SAFETY PLAN, #10 SAMET CORPORATION why work with us Internships, #13 SAMET. CORPORATION construction, JASON WOODARD AFFIDAVIT October 14th, 2024, JASON WOODARD AFFIDAVIT July 21st, 2025, TEN (10) PHOTOGRAPHS of accident site address 997 Morrison Drive Charleston, South Carolina 29403, date of May 01st, 2020, Evidence, statements, documents, Submitted to Charleston County Court of Common Pleas, Case number 2023-CP-10-01923 on July 21st, 2025 from Jeffrey Patrick Cepin, Anything submitted September 01st, 2025 & September 02nd, 2025 from Jeffrey Patrick Cepin to Case number 2023-CP-10-01923, September 02nd 2025 Court transcripts and corrections from case number 2023-CP-10-01923, Jeffrey Patrick Cepin's statements submitted to case number 2023-CP-10-01923 on July 21st 2025 and September 02nd 2025, Non-destructive concrete Evaluations & Testing (NDT), Certified Commercial Property Inspectors Association, [MetalDetector.com](#), Barton Supply

(Tendons), 6 Things You Need To Know About Concrete Structural Failures, Reinforcing Wire Mesh Photo, Prestressed Concrete (Yard Operations), Avoiding Costly Concrete Reinforcement Issues (Sean Marshall), Concrete Technology Corporation (Design Criteria & Span Load Charts), Concrete Technology Corporation (Technical Data For Detailing Double Tees), Concrete Technology Corporation (Standard Double Tee Reinforcement), Concrete Technology Corporation (End Bearing Assemblies and Reinforcement), LOCKE, SkyCiv, Wells (Design Guide Series), Wells (Double Tee Design Guide), Roof Decks A to Z, Vintage Cast, WBK Precast Components in Parking Structures), Tindall, South Carolina Code of Laws Unannotated Title 6 Local Government Provisions Applicable to Special Purpose Districts and other Political Subdivisions CHAPTER 9 Building Codes Section 6-9-5 Public Policy and Building codes (A) (B) (C), **Precast Prestressed Concrete Safety Inspectors, Precast Prestressed Concrete Engineers, Concrete Institutions, Concrete Architects, Concrete Inspectors, Metal Reinforcement Rebar Companies, Precast Prestressed Concrete Manufacturing Companies, Concrete Building Magazines, FEMA FEDERAL EMERGENCY MANAGEMENT AGENCY)**

Clearly shows that Metromont Corporation n/k/a Metromont LLC's IMPROPER MANUFACTURING of the Precast Prestressed Concrete Double T's & Samet Corporations NEGLECTED Duties and Responsibilities to inspect all products arriving on Samet Corporation's job site (997 Morrison Drive Charleston, South Carolina 29403) for Safety and Proper Building Code Permitted Standards, participated in the SUDDEN Parking Garage Collapse on 997 Morrison Drive, Charleston South Carolina 29403, that left me, Jeffrey Patrick Cepin, PERMANENTLY DISABLED!

Appeals Court of South Carolina, I, Jeffrey Patrick Cepin am asking you to over turn Judge Jennifer B. McCoy's verdict on December 09th, 2025 in case number 2023-CP-10-01923. Judge Jennifer B. McCoy did not make a proper Verdict Ruling according to the South Carolina Law Rule 56 Summary Judgment (C) Motion and Proceeding Thereon, and all evidence I, Jeffrey Patrick Cepin submitted to Case number 2023-CP-10-01923. All evidence submitted to this specific case number 2023-CP-10-01922 (Appellant case number [2025-002480](#)) states that for this type of Precast Prestressed Concrete Double T Parking Garage to Suddenly Collapse the Precast Prestressed Concrete Double T's would have had to be IMPROPERLY MANUFACTURED WITHOUT the proper BUILDING CODE PERMITTED METAL REINFORCEMENT. Also, for Judge Jennifer B. McCoy's refusal to let me, Jeffrey Patrick Cepin's explain all evidence against both defendants SAMET. Corporation and Metromont Corporation n/ k/a Metromont LLC.

All Evidence I, Jeffrey Patrick Cepin need reviewed in appellant case number [2025-002480](#) is attached in a folder below to support my, Jeffrey Patrick Cepin's claim that both Defendants Samet Corporation and Metromont Corporation n/k/a Metromont LLC participated in the SUDDEN Collapse of a parking garage at 997 Morison Drive, Charleston, South Carolina 29403, that left me, Jeffrey Patrick Cepin Permanently Disabled.

Thank you for your time, Appeals Court of South Carolina.

Jeffrey Patrick Cepin, May 04th, 2026

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A handwritten signature in black ink, appearing to read "Jeffrey P. Cepin". The signature is written in a cursive style with a large initial "J" and a distinct "P".