

FORM 13
BRIEF OF APPELLANT

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SC Court of Appeals

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

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.

[INITIAL] BRIEF OF APPELLANT

Jeffrey Patrick Cepin
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CHAPTER 11 CONTRACTORS ARTICLE 1 IN GENERAL SECTION 40-11-10 (A), SECTION 40-11-420 (A) (B), AS WELL AS, THE CHARLESTON COUNTY SPECIAL INSPECTION PROCEDURE IBC CHAPTER 17 2021 EDITION, AND THE SAMET CORPORATION SITE SPECIFIC SAFETY PLAN DOCUMENTS. JUDGE JENNIFER B. McCoy ERRED WHEN REVIEWING THE EVIDENCE TO THE LAWS AND GRANTING SUMMARY JUDGMENT IN RESPONDENTS / DEFENDANTS FAVOR..... 14, 15, 16, 17

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Neil Barry et al .v Quality Steel Products, Inc., et al., 280 Conn. 1, 904 A.2d 132 (2006)

STATUTES

South Carolina Code of Laws Unannotated, Title 15 - Civil Remedies and Procedures, Chapter 73, Sellers of Defective Products, Section 15-73-10 Liability Of Sellers For Defective Product.

South Carolina Code Of Laws Unannotated, Title 40 - Professions Occupations, Chapter 11 Contractors, Article 1 In General, Section 40-11-10 (A), Section 40-11-420 (A) (B).

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 For Building Codes (A) (B) (C).

South Carolina Rule 56 Of Civil Procedures Summary Judgment

OTHER AUTHORITIES

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, **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.**

STATEMENT OF ISSUES ON APPEAL

Did the Charleston County Court of Common Pleas Judge Jennifer B. McCoy error when reviewing Appellants evidence that clearly proves the Precast Prestressed Concrete Double T products were improperly manufactured to the permitted International Building Code Safety Requirements And Standards when granting Summary Judgment in Both Respondents / Defendants favor.

Did the Charleston County Court Of Common Pleas Judge Jennifer B. McCoy error when granting Summary Judgment in Both Respondents favor Under The Proper South Carolina Rule 56 Of Civil Procedures Summary Judgment Criteria (no genuine issue as to any material fact).

Did the Charleston County Court Of Common Pleas Judge Jennifer B. McCoy error when granting Summary Judgment in Respondent Samets Corporations favor when reviewing the evidence for Samet Corporation's Negligence and Neglected Legally Bonded Contracted Responsibilities as the General Contractor Under South Carolina laws Title 40 Chapter 11, Title 6 Chapter 9, Title 15 Chapter 73, The Charleston County Special Inspection Procedure IBC Chapter 17 2021 Edition and the Samet Corporation Site Specific Safety Plan documents.

STATEMENT OF THE CASE

On May 01st, 2020 Respondent Samet Corporation accepted multiple Prestressed Precast Concrete Double T Products from the other Respondent Metromont Corporation n/k/a Metromont LLC that were Improperly Manufactured to the Proper Permitted Building Code Safety Requirements in Charleston County South Carolina. The Prestressed Precast Concrete Double T Products were Manufactured WITHOUT the Properly Permitted Safety Building Code Metal Reinforcement required by the International Building Code Council. Both Respondents / Defendants Samet Corporation and Metromont Corporation n/k/a Metromont LLC. Neglected to Properly Inspect the improperly manufactured Prestressed Concrete Double T products Before approving the Prestressed Precast Concrete Double T products for Construction. By Both Respondents Defendants failing to properly inspect the Prestressed Precast Concrete Double T Products a parking garage / structure on 997 Morrison Drive, Charleston South Carolina 29403, Suddenly Collapsed Leaving me, Appellant Jeffrey Patrick Cepin Permanently Disabled. In the Past Six Years Multiple 3rd Party Personal Injury Law Suits were Filed against Both Respondents / Defendants on my, Jeffrey Patrick Cepin Appellant's Behalf. On November 12th, 2024 Both Respondents / Defendants took me, Jeffrey Patrick Cepin Appellant to court in a Summary Judgment case in the South Carolina Charleston County Court of Common Pleas with Judge Jennifer B. McCoy, to end this 3rd party personal injury Law Suite over the Sole Purpose of a statutory employee claim. On December 03rd, 2024 Judge Jennifer B. McCoy ruled against Both Respondents / Defendants Summary Judgment Statutory Employee Specific Claim, but opened up discovery for Both Respondents / Defendants Summary Judgment Statutory Employee Specific filing dates of March 08th, 2024 and June 17th, 2024. Judge Jennifer B. McCoy gave a deadline, close of discovery date being March 15th, 2025. After Discovery Closed Both Respondents / Defendants filed a completely different, new Summary Judgment (Metromont Corporation n/k/a Metromont LLC filing date May 05th, 2025, Samet Corporation filing date June 27th, 2025) for Both Defendants Participation in the May 01st, 2020 997 Morrison Drive Charleston, South Carolina 29403 parking garage Sudden Collapse that left me, Appellant Jeffrey Patrick Cepin Permanently Disabled. On July 21st, 2025 Judge Thomas J. Rode of the South Carolina Charleston County Court of Common Pleas continued, moved the Respondent / Defendants New Summary Judgment motion. On September 02nd, 2025 Both Respondents / Defendants Summary Judgment were heard in front of Judge Jennifer B. McCoy in the South Carolina Court of Common Pleas. Judge Jennifer B. McCoy accepted my, Appellant Jeffrey Patrick Cepin's evidence but would not let me, Appellant Jeffrey Patrick Cepin explain the evidence. On December 09th, 2025 Judge Jennifer B. McCoy granted Summary Judgment in Both Respondents / Defendants favor without either Respondent / Defendant showing one single piece of evidence excluding the Respondents from being a participant in the sudden collapse of a parking garage on 997 Morrison Drive Charleston, South Carolina 29403. On December 12, 2025 I, Appellant Jeffrey Patrick Cepin Filed an appeal with the Appeals Court of South Carolina.

STANDARD OF REVIEW

When reviewing all evidence submitted to case number 2023-CP-10-01923 now Appellant case number 2025-002480 especially the 10 photos of accident site, reinforcing wire mesh photo, Prestressed (Concrete Yard Operations), Concrete Technology Corporation (Design Criteria & Span-Load Charts), Concrete Technology Corporation (standard Double Tee Reinforcement), Concrete Technology Corporation (Technical Data for Detailing Double Tees) Concrete Technology Corporation (End Bearing Assemblies and Reinforcement), LOCKE, Tindall, Certified Commercial Property Inspectors Association, Samet Corporation we think like an owner and MetalDetector.com. The Respondents / Defendants Precast Prestressed Concrete Double T products arrived from the Manufacturer defective, unsafe and improperly constructed without the International Building Code required Metal Reinforcement Components. With proper inspections and NDT (Non-destructive Testing) instruments the Precast Prestressed Concrete Double T Products defect, missing Metal reinforcement would have been noticed. If NDT (Non-destructive testing) was used this accident could have been avoided. This Accident falls under the South Carolina Code. of Laws Unannotated Title 15 - Civil Remedies and Procedures Chapter 73 Sellers of Defective Products Section 15-73-10 Liability of sellers for defective products. Judge Jennifer B. McCoy clearly made an error when reading construction drawings and comparing defective (accident photos) Precast Prestressed Concrete Double T Photos. As in Keene v. CNA Holdings LLC, if proper inspections were administered correctly the defected area would have been noticed and a person (worker) would never have got sick and died. As in Neil Barry et al v. Quality steel Products INC. if the inspection process was accordingly the defective parts would have been noticed and replaced without an accident causing injuries. Like Shannon Shaw v. Amazon.com Inc. if a proper inspection monitoring of driver safety behavior was done the drivers defective habit would have been corrected and an accident causing injuries would have been avoided.

STANDARD OF REVIEW

When reviewing all the evidence submitted to case number 2023-CP-10-01923 and Appellant case number 2025-002480 especially the 10 photos of accident site 997 Morrison Drive, Charleston, South Carolina 29403, Charleston County Special Inspection Procedure IBC Chapter 17 2021 Edition, Samet Corporation Site Specific Safety Plan, South Carolina Building Code Council Documents, Avoiding Costly Concrete Reinforcement Issues (Sean Marshall), reinforcing wire mesh photo, Prestressed (Concrete Yard Operations), Concrete Technology Corporation (Design Criteria & Span-Load Charts), Concrete Technology Corporation (standard Double Tee Reinforcement), Concrete Technology Corporation (Technical Data for Detailing Double Tees) Concrete Technology Corporation (End Bearing Assemblies and Reinforcement), LOCKE, Tindall, Certified Commercial Property Inspectors Association, Samet Corporation we think like an owner and MetalDetector.com, Non-Destructive Concrete Evaluations & Testing (NDT). The

Respondents / Defendants Precast Prestressed Concrete Double T Products were defective from the manufacturing facility without the necessary required Safety metal reinforcement standards Permitted by the international Building Code Council. The Respondents / Defendants Neglected their Legally Bonded Contracted Duties to properly inspect the Precast Prestressed Concrete Double T products for defects and to insure the permitted safety metal reinforcement standards required by the International Building Code Council were upheld. By Respondents / Defendants failing to do inspections on Precast Prestressed Concrete Double T products a parking garage / structure Collapsed causing me, Appellant Jeffrey Patrick Cepin Permanent Disability. This accident on May 01st, 2020 and Permanent Disability could have been avoided if Respondents / Defendants did their legally bonded contracted duties and preformed proper NDT (Non-destructive Testing) and construction management on defective Precast Prestressed Concrete Double T Products. This accident and negligence falls under the South Carolina Code Of Laws Unannotated title 40 - Professions and Occupations Chapter 11 Contractors Article 1 In General Section 40-11-10 (A) Section 40-11-420 (A) (B). Judge Jennifer B. McCoy Clearly made an error when comparing Laws and the evidence to the legally bonded contracted Duties, Responsibilities of the Respondents / Defendants when it comes to defective products. As in Keene v. CNA Holdings LLC if Building Code Inspections were properly coordinated and maintained the defective product would have been noticed and no person (worker) would have got sick and died. Like the case of Neil Barry et al .v Quality Steel Products Inc. et al, if routine proper inspections were done to Building Code Requirements the defective parts would have been noticed and no person (worker) would have be injured in an accident. Just like Shannon Shaw v. Amazon.com Inc. if driver behaviors were monitored and observed through driver inspection processes the defective products habit would have been noticed and stoped before an accident happened resulting in injuries.

STANDARD OF REVIEW

This accident and negligence falls also falls under the 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 for Building Codes (A) (B) (C). When reviewing all the evidence submitted to case number 2023-CP-10-01923 and Appellant case number 2025-002480 especially the 10 photos of accident site 997 Morrison Drive, Charleston, South Carolina 29403, Charleston County Special Inspection Procedure IBC Chapter 17 2021 Edition, Samet Corporation Site Specific Safety Plan, South Carolina Building Code Council Documents, Avoiding Costly Concrete Reinforcement Issues (Sean Marshall), reinforcing wire mesh photo, Prestressed (Concrete Yard Operations), Concrete Technology Corporation (Design Criteria & Span-Load Charts), Concrete Technology Corporation (standard Double Tee Reinforcement), Concrete Technology Corporation (Technical Data for Detailing Double Tees) Concrete Technology Corporation (End Bearing Assemblies and Reinforcement), LOCKE, Tindall, Certified Commercial Property

Inspectors Association, Samet Corporation we think like an owner and MetalDetector.com, Non-Destructive Concrete Evaluations & Testing (NDT). The Respondents / Defendants Precast Prestressed Concrete Double T Products were defective from the manufacturing facility without the necessary required Safety metal reinforcement standards Permitted by the international Building Code Council. The Respondents / Defendants Neglected their Legally Bonded Contracted Duties to properly inspect the Precast Prestressed Concrete Double T products for defects and to insure the permitted safety metal reinforcement standards required by the International Building Code Council were upheld. By Respondents / Defendants failing to do inspections on Precast Prestressed Concrete Double T products a parking garage / structure Collapsed causing me, Appellant Jeffrey Patrick Cepin Permanent Disability. This accident on May 01st, 2020 and Permanent Disability could have been avoided if Respondents / Defendants did their legally bonded contracted duties and preformed proper NDT (Non-destructive Testing) and construction management on defective Precast Prestressed Concrete Double T Products. Judge Jennifer B. McCoy Clearly made an error when comparing Laws and the evidence to the legally bonded contracted Duties, Responsibilities of the Respondents / Defendants when it comes to defective products. As in Keene v. CNA Holdings LLC if Building Code Inspections were properly coordinated and maintained the defective product would have been noticed and no person (worker) would have got sick and died. Like the case of Neil Barry et al .v Quality Steel Products Inc. et al, if routine proper inspections were done to Building Code Requirements the defective parts would have been noticed and no person (worker) would have be injured in an accident. Just like Shannon Shaw v. Amazon.com Inc. if driver behaviors were monitored and observed through driver inspection processes the defective products habit would have been noticed and stoped before an accident happened resulting in injuries. Judge Jennifer B. McCoy clearly made an error when ruling in favor of the Respondents / Defendants granting Summary Judgment when Respondents / Defendants have not submitted one single piece of evidence to show their Precast Prestressed Concrete Double T Products were not defective.

STANDARD OF REVIEW

When reviewing all the evidence submitted to case number 2023-CP-10-01923 and Appellant case number 2025-002480 (South Carolina Code of Laws Tittle 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** South Carolina Code Of Laws Unannotated Title 15 - Civil Remedies and Procedures Chapter 73 Seller Of Defective Products Section 15-73-10 Liability Of Sellers For Defective Products) the Respondents / Defendants Neglected to properly INSPECT the Safety of the Precast Prestressed Concrete Double T Products during manufacturing and when delivered to the accident site of 997 Morrison Drive, Charleston South Carolina, 29403. If Respondents / Defendants would have done their Legally Bonded Contracted Responsibilities, Duties and inspected the Precast Prestressed Concrete Double T Products with Proper NDT (Non-Destructive Testing) equipment, Respondents / Defendants would have discovered the Precast Prestressed Concrete Double T Products were not manufactured to proper permitted International Building Code Safety Standards and stoped the defective Precast Prestressed Concrete Double T Products from being used furthermore avoiding the accident and causing Permanent Disability to me, Appellant Jeffrey Patrick Cepin. Judge Jennifer B. McCoy clearly made an error when analyzing all the evidence on file under the South Carolina Rule 56 Summary Judgment ((c) **Motions and Proceedings Thereon.** The motion shall be served at least 10 days before the time fixed for the hearing. The adverse party may serve opposing affidavits not later than two days before the hearing. The judgment sought shall be rendered forthwith if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is

entitled to a judgment as a matter of law. A summary judgment, interlocutory in character, may be rendered on the issue of liability alone although there is a genuine issue as to the amount of damages.) that me, Appellant Jeffrey Patrick Cepin did not display or prove that there was a genuine issue as to any material fact that the Precast Prestressed Concrete Double T Products were Defective from the manufacture Respondents / Defendants. The case of Keene v. CNA Holdings LLC reviewing evidence showed improper inspections which led to an area being defective and causing a person (worker) to get sick and die. In Neil Barry et al. v. Quality steel Products evidence revealed a defective part was being used which cause an accident and injuring multiple people (workers). With Shannon Shaw v. Amazon.com Inc. a driver was found to be utilizing a defective operating procedure and caused an accident injuring someone. Judge Jennifer B. McCoy clearly made an error when ruling in favor of the Respondents / Defendants granting Summary Judgment when Respondents / Defendants have not submitted one single piece of evidence to show their Precast Prestressed Concrete Double T Products were not defective. All it takes is One Single defective product, thing, element, to cause catastrophic damage, NOT MULTIPLE.

FACTS

Every Single Piece of evidence I, Appellant Jeffrey Patrick Cepin submitted to case number 2023-CP-10-01923 Appellant case number 2025-002480 states for a parking garage / structure manufactured from Precast Prestressed Concrete Double T Products to suddenly collapse the Precast Prestressed Concrete Double T Products had to be defective, improperly manufactured without the Proper Permitted International Building Code Safety Standard Required Metal Reinforcement. (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** South Carolina Code Of Laws Unannotated Title 15 - Civil Remedies and Procedures Chapter 73 Seller Of Defective Products Section 15-73-10 Liability Of Sellers For Defective Products).

Respondents / Defendants have not submitted a Single Piece of evidence showing there Defective Precast Prestressed Concrete Double T Product was not a participating element in the sudden collapse of the 997 Morrison Drive, Charleston South Carolina, 29403 parking garage Permanently Disabling me, Appellant Jeffrey Patrick Cegin.

There were No other Drug and Alcohol test performed on any other personnel on the 997 Morrison Drive, Charleston South Carolina 29403 parking garage's sudden Collapse (incident) as required by Respondent / Defendant Samet Corporations Site Specific Safety Plan (page 7) Substance Abuse Policy. Respondent Samet Corporations Substance Abuse Police state that every worker involved in an incident shall have a post incident drug and alcohol test performed with in 3 hours of the incident. If worker refuses the test they will no longer be Permitted on that specific job site. Since I, Appellant Jeffrey Patrick Cegin was the only worker Drug and Alcohol tested from the May 01st, 2020 accident site 997 Morrison Drive, Charleston South Carolina, 29403, it proves no other person was involved and the Respondents / Defendants Defective Precast Prestressed Concrete Double T Products were the Participating factor that cause the sudden collapse of the 997 Morrison Drive Charleston South Carolina 29403 parking garage that left me, Appellant Jeffrey Patrick Cegin Permanently Disabled. There should have been at least 4 other Drug and Alcohol test performed (1 Crain Personnel, 1 Rigging Personnel and 2 fitters / setters). Totaling 5 Drug and Alcohol test all together including me, Appellant Jeffrey Patrick Cegin (welder). Only 1 Drug and Alcohol test was preformed from this incident on May 01st, 2020, 997 Morrison Drive Charleston, South Carolina 29403. For this reason alone the appeals Court of South Carolina should over turn Judge Jennifer B. McCoys ruling granting the Respondents / Defendants Summary Judgment.

ARGUMENTS

1. RESPONDENT METROMONT CORPORATION N/K/A METROMONT LLC FAILED TO MANUFACTURE MULTIPLE PRECAST PRESTRESSED CONCRETE DOUBLE T PRODUCTS TO PROPER PERMITTED SAFETY BUILDING CODE METAL REINFORCEMENT REQUIREMENTS, AND WAS GRANTED SUMMARY JUDGMENT WITHOUT SHOWING ONE SINGLE PIECE OF EVIDENCE PROCLAIMING A DEFECT DID NOT EXIST. JUDGE JENNIFER B. McCoy ERRED WHEN REVIEWING EVIDENCE UNDER THE SOUTH CAROLINA RULE 56 (C). THIS MANUFACTURING DEFECT RESULTED IN A SUDDEN COLLAPSE OF A PARKING GARAGE LEAVING ME, APPELLANT JEFFREY PATRICK CEPIN PERMANENTLY DISABLED.....

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 Rule 56 Summary Judgment (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 (in other words not defective).

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 Products involved in the accident on May 01st, 2020 that permanently disabled me, Jeffrey Patrick Cepin were Defective 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

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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. Products & 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 Product 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, Appellant Jeffrey Patrick Cepin 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.

- 2. RESPONDENTS METROMONT CORPORATION N/K/A METROMONT LLC AND SAMET CORPORATION NEGLECTED THEIR LEGALLY BONDED CONTRACTED DUTIES TO PROPERLY INSPECT THE IMPROPERLY MANUFACTURED PRECAST PRESTRESSED CONCRETE DOUBLE T PRODUCTS FOR DEFECTS, A THIRD PARTY PRODUCT LIABILITY, PERSONAL INJURY LAW SUITE IS BEING BROUGHT AGAINST THE INDIVIDUAL COMPANIES UNDER SOUTH CAROLINA CODE OF LAWS UNANNOTATED TITLE 15 - CIVIL REMEDIES AND PROCEDURES CHAPTER 73 SELLERS OF DEFECTIVE PRODUCTS SECTION 15-73-10 LIABILITY OF SELLERS FOR DEFECTIVE PRODUCTS. JUDGE JENNIFER B. McCoy ERRED WHEN REVIEWING THE EVIDENCE TO THE LAWS AND GRANTING SUMMARY JUDGMENT IN RESPONDENTS / DEFENDANTS FAVOR.....**

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.

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- 3. RESPONDENT SAMET CORPORATION AS THE GENERAL CONTRACTOR OF THE PARKING GARAGE AT 997 MORRISON DRIVE, CHARLESTON SOUTH CAROLINA , 29403 NEGLECTED THEIR LEGALLY BONDED CONTRACTED DUTIES TO PROVIDE NON-DEFECTIVE, SAFE AND PROPERLY INSPECTED BUILDING CODE PERMITTED, PRECAST PRESTRESSED CONCRETE DOUBLE T PRODUCTS UNDER THE SOUTH CAROLINA CODE OF LAWS UNANNOTATED TITLE 40 - PROFESSIONS AND OCCUPATIONS CHAPTER 11 CONTRACTORS ARTICLE 1 IN GENERAL SECTION 40-11-10 (A), SECTION 40-11-420 (A) (B), AS WELL AS, THE CHARLESTON COUNTY SPECIAL INSPECTION PROCEDURE IBC CHAPTER 17 2021 EDITION, AND THE SAMET CORPORATION SITE SPECIFIC SAFETY PLAN DOCUMENTS. JUDGE JENNIFER B. McCoy ERRED WHEN REVIEWING THE EVIDENCE TO THE LAWS AND GRANTING SUMMARY JUDGMENT IN RESPONDENTS / DEFENDANTS FAVOR.....**

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CONCLUSION

For reasons and evidence stated above, The South Carolina Court Of Appeals should reverse the Judgment of Judge Jennifer B. McCoy.

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

May 14th, 2016

Jeffrey Patrick Cepin,
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