

**RECEIVED**

**May 18 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

The Honorable Bryan Doby, Circuit Court Judge

Appellate Case No.: 2025-002132

Cynthia Veronese,

Appellant,

v.

Jarrel Wigger and Wigger Law Firm, Inc.,

Respondents

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**MOTION TO AUGMENT THE RECORD ON APPEAL  
AND FOR AN EXTENSION OF TIME IN WHICH TO  
FILE APPELLANT'S BRIEF**

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MOTION TO AUGMENT THE RECORD ON APPEAL

Appellant, Cynthia Veronese, pursuant to Rule 212, South Carolina Court of Appeals, respectfully moves the Court and requests augmentation of the record on appeal to include the following documents:

1. Transcripts of the hearing on August 21, 2025, which are not a part of the trial Court record but were already included in the Record on Appeal (ROA, pp. 89-109).

The following emails were not included as part of the trial court record because they were exchanged directly with Judge Bryan Doby, and also with the Court Coordinator. The emails below do not affect the Respondents, who simultaneously received copies of such messages. They are crucial to this appeal because they are directly relevant to demonstrate that the trial Judge denied a continuance to the Appellant and instructed her to argue her Motion during the hearing of August 21, 2025, but interrupted her thirteen times when she attempted to prove her case and evidence of fraud upon the Court by the Defendants:

2. Appellant's email of August 8, 2025, requesting to argue her Motion for Sanctions at the hearing of August 21, 2025, followed by Judge Bryan Doby's (law clerk) email denying her request, informing the Plaintiff that the Judge could only hear what is on his roster, and instructing her to file it and schedule it with the Clerk of Court.

3. Appellant's email of August 8, 2025 to the Clerk Coordinator, asking her to schedule the Motion for Sanctions to be heard during the same hearing of August 21, 2025, and subsequent email from the Clerk Coordinator to Judge Doby's law clerk asking if the additional motion should be scheduled – there was no response from Judge Doby's law clerk, and the Plaintiff's Motion for Sanctions was never scheduled to be heard.

4. Appellant's email of August 12, 2025, requesting for a continuance in order to first analyze the deceptive facts that sustained the defendants' motions to dismiss and bring out the true facts of the case in a thorough discussion before an informed decision could be made, and Judge Bryan Doby's (law clerk) email of August 12, 2025, denying it, and instructing the Appellant to argue her Motion and request for a continuance during the hearing on August 21, 2025. The Plaintiff nevertheless traveled from Brazil and appeared in person.

5. Plaintiff's email submitting her Motion to Strike (ROA, pp. 39-55) and Opposition to Defendants' Motion to Dismiss (ROA, pp. 56-60) to Judge Doby two days before the hearing on August 21, 2025. The Plaintiff filed this Motion to Strike with the Clerk of Court, in lieu of the previous Motion for Sanctions, because she located clear and convincing evidence (ROA, p. 55) that Defendant Wigger was being untruthful when he stated that the Appellant failed to provide him with crucial evidence from the night of the assault, and used this false argument as a reason to improperly attach such evidence to his Answers, directly impacting the Plaintiff's ability to obtain an expert affidavit. When matters outside the pleadings are presented and not excluded by the Court on a motion under Rule 12(b)(6), the motion must be treated as one for summary judgment under Rule 56. Upon receipt of the Plaintiff's Motion to Strike and attached

evidence, Judge Doby should have cancelled the hearing on the Defendants' Motion to Dismiss, transformed their motions to dismiss into one for Summary Judgment, and allowed both parties to argue the evidence of their allegations.

True and correct copies of the requested documents are attached to this motion as Exhibits 1 through 5.

As is set forth in the Declaration of Cynthia Veronese, attached hereto, owing to Appellant's excusable neglect the documents requested, although necessary in order for this court to fully understand the facts and fairly determine the issues in this appeal, were inadvertently not designated in Appellant's Notice Designating Record on Appeal.

The Notice of Appeal in this case was filed on October 16, 2025; the appellate record was filed on April 27, 2026. This Application is based on the attached Memorandum of Points & Authorities and the Declaration of Cynthia Veronese attached hereto. The documents requested are necessary in order for this court to fully understand the facts and fairly determine the issues in this appeal.

## MEMORANDUM OF POINTS & AUTHORITIES

### **I. The Record on Appeal Requires Augmentation**

#### **A. The Record on Appeal May Be Augmented on the Motion of a Party**

Rule 212(b), SCACR, authorizes supplementation or augmentation of the Record on Appeal upon motion to the appellate court when materials necessary for full and fair review were omitted from the record.

#### **B. Augmentation of the Record is Necessary and Appropriate in this Case**

Appellant requests that the record on appeal be augmented to include the documents and transcripts listed in Appellant's Motion.

As is set forth in the Declaration of Cynthia Veronese attached hereto, the requested documents are essential for this court's full understanding and fair determination of Appellant's appeal, but they were inadvertently not designated for inclusion on the record on appeal. Augmentation of the record will not prejudice any party in any way. The record should therefore be augmented as prayed. (SC Rules of Court, 212(b)).

### **II. An Extension of Time to File Appellant's Brief is Necessary**

The materials sought to be added to the appellate record are essential to appellant's arguments on appeal. Appellant therefore requests an extension of 15 days from entry of this Court's ruling on this motion in which to file the Appellant's Brief.

This Motion to Augment the Record seeks to incorporate materials that bear upon the arguments already presented. The sole distinction lies in the fact that the Plaintiff initially requested—and obtained—permission from Judge Doby to present oral arguments regarding a Motion for Sanctions; however, having subsequently discovered evidence crucial to the case, the

Plaintiff converted that Motion for Sanctions—which had been emailed to the Judge but never formally filed with the Clerk of the Court—into a Motion to Strike, which was duly filed and now forms part of the Appellate Record. During the hearing held on August 21, 2025, Judge Doby confirmed that he had read the Plaintiff’s Motion to Strike; nevertheless, he interrupted her thirteen times while she attempted to present her arguments. Should this Court deem such a distinction to be substantial, the Appellant respectfully requests that she be granted leave and additional time to file an Amended Initial Brief, in substitution of the Appellant’s Final Brief.

CONCLUSION

For the foregoing reasons, the record should be corrected to include the documents identified in this Motion, and Appellant should be granted an extension of time in which to file the Appellant’s Brief.

May 18, 2026.

Respectfully submitted,



Cynthia Veronese  
Pro Se Appellant

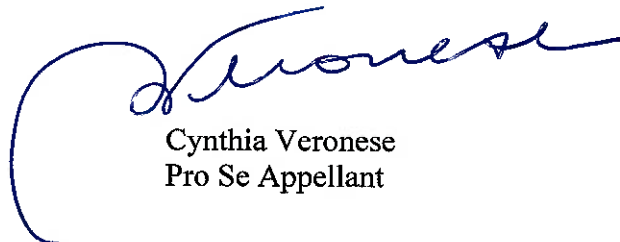
DECLARATION OF CYNTHIA VERONESE

Cynthia Veronese declares as follows:

1. I am the Appellant in this appeal.
2. I filed my Notice of Appeal in this case on October 16, 2025. I filed my Notice Designating Record on Appeal on February 17, 2026. The record was filed on April 27, 2026.
3. The attached documents are crucial to this appeal because they are directly relevant to demonstrate that the trial Judge denied a continuance to the Appellant and instructed her to argue her motion during the hearing of August 21, 2025, but interrupted her thirteen times when she attempted to prove her case and evidence of fraud upon the Court by the Defendants. The transcripts need to be on the record because they describe what transpired during the hearing on August 21, 2025.
4. The Appellant did not make this request sooner due to her own excusable neglect. She cares for her 96-year-old mother and goes long periods without rest, and for this reason failed to request that the attached emails were included in the record.
5. The appellant reasons constitute “good cause”, and she should be allowed to add the documents to the record at this point.
6. The requested documents are attached to this Motion as Exhibits 1 through 5. The requested original transcripts were already lodged with this Court concurrently with the filing of the Record on Appeal.
7. For the reasons stated above, the record on appeal should be augmented to include the documents listed in Appellant’s Motion, and the Court is respectfully asked to order such augmentation.

I declare under penalty of perjury under the laws of the State of South Carolina that the foregoing is true and correct.

May 18, 2026

  
Cynthia Veronese  
Pro Se Appellant

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion to Augment the Record on Appeal and for an Extension of Time was served upon counsel for Respondents by electronic mail and by UPS tracking number 1Z2R3F650346766671 on this 18th day of May, 2026.



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Cynthia Veronese  
Pro Se Appellant

# **EXHIBIT 1**

State of South Carolina	)	Court of Common Pleas
	)	Ninth Judicial Circuit
County of Charleston	)	Case No. 2025-CP-10-02069
	)	
	)	
	)	
Cynthia Veronese,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	Transcript of Record
	)	
	)	
Jarrel Wigger and Wigger	)	
Law Firm,	)	
	)	
Defendants.	)	
	)	

August 21, 2025  
Charleston, South Carolina

B E F O R E:

The Honorable S. Bryan Doby, Judge

A P P E A R A N C E S:

Cynthia Veronese  
Pro Se Plaintiff

Ivon Keith McCarty, Esquire  
Attorney for the Defendant

Proceedings taken down electronically

Transcribed by:  
Krystal J. Smith  
Official Circuit Court Reporter III

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I N D E X

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Court Reporter Certification.....	21

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EXHIBITS

<u>NO.</u>	<u>DESCRIPTION</u>	<u>ID.</u>	<u>EV.</u>
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(No Exhibits Presented)

COURT REPORTER LEGEND

dashes --	intentional or purposeful interruption or change in thought
ellipses . . .	trailing off
[ph]	phonetically written
[sic]	written as said

1 AUGUST 21, 2025

2 (WHEREUPON, the proceedings began at 3:06 PM.)

3 THE COURT: All right. Our next case is 2025-CP-10-

4 02069. That's Cynthia Veronese versus Jarrel Wigger.

5 MR. MCCARTY: Good afternoon, Your Honor.

6 THE COURT: How are you doing today?

7 MR. MCCARTY: No complaints.

8 THE COURT: Mr. McCarty?

9 MR. MCCARTY: Yes, sir. You're right.

10 THE COURT: Ms. Veronese?

11 THE PLAINTIFF: Yes.

12 THE COURT: How are you today?

13 THE PLAINTIFF: I am fine. I came from Brazil here.

14 THE COURT: Ma'am?

15 THE PLAINTIFF: I came from Brazil directly here for this

16 hearing.

17 THE COURT: I hope you had a good trip.

18 THE PLAINTIFF: I did.

19 THE COURT: All right. Thank you.

20 I have two motions pending, but it looks like the same

21 motion. Is that right, Mr. McCarty?

22 MR. MCCARTY: It's just -- yeah, it's a motion -- it's a

23 motion to dismiss under 12(b)(6) and under the expert

24 affidavit thing. So it's -- it may -- I guess you could say

25 it's two motions, but it's just one. I'm just giving you two

1 reasons.

2 THE COURT: We got -- we got two reasons, but either one  
3 is a motion to dismiss?

4 MR. MCCARTY: That's correct, Your Honor.

5 THE COURT: Mr. McCarty, I'm glad to hear from you.

6 MR. MCCARTY: All right, Your Honor. I represent Jarrel  
7 Wigger, who is an attorney here in town. This action was --  
8 was filed in -- April 29th of this year and against him  
9 regarding a -- a -- a relationship between these two parties  
10 that took place back several years ago.

11 He was approached by Mrs. Veronese about representing  
12 them. He reviewed the case and decided not to take it.  
13 That's spelled out in the pleadings. That's -- that's all I  
14 need to say. Her claim from the pleadings seems to be that  
15 what he did wrong was he failed to take her case. Okay?

16 So under 12(b)(6), that's not -- an attorney does not  
17 have to take a case. You know, there's no requirement for  
18 that. So under 12(b)(6), we feel like the complaint should be  
19 dismissed for that reason, for failure to state that -- state  
20 any claim.

21 The second and -- and really, I think, the most important  
22 one is she has failed to file an expert affidavit under 15-36-  
23 100, the expert affidavit thing. We've actually been in -- in  
24 court on -- on this case before on May 28th where this issue  
25 came up. We were talking about it again. Due to the fact

1 that she's pro se, the judge gave her until now to -- to come  
2 up with an affidavit.

3 I haven't seen an affidavit. One hasn't been filed. She  
4 hasn't retained counsel. And it's -- you know, that affidavit  
5 exists just to keep what I consider these type of cases from  
6 being -- from being right. So we would ask that you dismiss  
7 the case based upon that.

8 THE COURT: Thank you, Mr. McCarty.

9 Ms. Veronese, I'm glad to hear from you.

10 THE PLAINTIFF: Your Honor, so he's -- he's saying that  
11 I'm complaining because he didn't want to take my case. It's  
12 not true. He took my case, kept it for more than eight  
13 months, and didn't do anything. There were three lawyers from  
14 his law firm during the time that he kept my case. Nobody did  
15 anything, and they left the case without saying a word to me  
16 almost on -- or when the running of the statute of  
17 limitations.

18 And the problem with this -- the case and the affidavit  
19 is the untruthful allegations that they made. I filed a  
20 motion to strike, and I didn't even list all the problems, all  
21 the untruthful allegations.

22 So when the expert looks into the case, they get confused  
23 because they attached evidence that should have been protected  
24 by attorney-client privilege, saying that I failed to give  
25 them information that I gave actually to them before they took

1 my case. So they are trying -- they did all this.

2 They -- they put me through unbelievable suffering, and  
3 they are doing now by saying -- they are doing this now by  
4 saying, no, this is Cynthia's fault because she failed to give  
5 us the information that she gave later. It's not true. I  
6 gave everything that I had before they took the case, because  
7 they need to be able to analyze the case before taxing it. So  
8 I provided the information that was necessary that I had.

9 THE COURT: Yes, ma'am. I'm -- I'm probably even more  
10 particularly interested in your arguments about the  
11 requirement to file an affidavit, from a lawyer in this case,  
12 that Mr. Wigger had committed some malpractice, which is the  
13 requirement of our statutes to file a professional negligence  
14 case.

15 THE PLAINTIFF: Yes. Well, what -- do you want to know  
16 what he did?

17 THE COURT: No, ma'am. There is a requirement under our  
18 statutes that when you file a professional negligence case --  
19 that could be a medical malpractice case, a legal malpractice  
20 case, a case against a dentist or an architect. Any  
21 professional malpractice case requires there to be an  
22 affidavit from a qualified expert laying out the specifics  
23 that the, in this case, lawyer had committed that would  
24 essentially --

25 THE PLAINTIFF: I understand.

1 THE COURT: -- back up your allegations that he committed  
2 malpractice.

3 THE PLAINTIFF: Uh-huh.

4 THE COURT: And without that affidavit, our statutes do  
5 not allow a case to go forward.

6 THE PLAINTIFF: I understand.

7 THE COURT: So that's what I'm particularly interested in  
8 --

9 THE PLAINTIFF: And that's what I --

10 THE COURT: -- hearing about that from you.

11 THE PLAINTIFF: That's what I'm -- I'm -- I'm -- that's  
12 what I'm saying. Did you get a chance to read my motion to  
13 strike?

14 THE COURT: Yes, ma'am.

15 THE PLAINTIFF: And the problem is, when the expert looks  
16 into the case, who do they believe if an attorney is saying  
17 one thing that is false, it's entirely false and can be proven  
18 in writing that it's false?

19 I am from another country, so my -- my word is not that  
20 strong. So when I have an American attorney from the town  
21 saying what she -- what Cynthia did is this, and it's false,  
22 the only thing that I can do is say it's false and I can prove  
23 it.

24 THE COURT: Yes, ma'am, but you've got to have an  
25 affidavit from an expert. In this case, it would be a lawyer.

1 THE PLAINTIFF: Uh-huh.

2 THE COURT: I'm assuming it could be a lawyer spelling  
3 out the specific allegations and -- and -- and specifications  
4 --

5 THE PLAINTIFF: Absolutely.

6 THE COURT: -- of negligence that would qualify you to be  
7 able to file this --

8 THE PLAINTIFF: Uh-huh.

9 THE COURT: -- legal malpractice case.

10 THE PLAINTIFF: But I filed in the last ten days, the  
11 last ten days before the expiration of the statute of  
12 limitations. So I was allowed to file the case because of  
13 that. The last ten days, you can file without the affidavit  
14 and then later file the affidavit.

15 But unfortunately, since this case has started, they  
16 already filed the answer with that horrible information, and  
17 this is going against me. So I need to strike that false  
18 information from the case to be able to get the affidavit from  
19 the expert.

20 Otherwise, we are going to be running around, running  
21 around, and then the expert looks into the lying -- I'm sorry  
22 -- or the untruthful information, and they -- they say I'm  
23 sorry. You know, if you fail to give to your attorney the  
24 information that he needed before you offered him the case,  
25 how can I -- he -- there is no malpractice.

1 But it's not true. That's what I'm saying. I need to  
2 clean up the files before this expert is going to give me this  
3 affidavit.

4 THE COURT: Well, let me look at the last order that was  
5 issued. I think -- was it issued by Judge Rode?

6 THE PLAINTIFF: No. Judge Rode --

7 MR. MCCARTY: Your Honor, I think it might have been  
8 Judge McCoy. I'm not sure.

9 THE COURT: Was it Judge McCoy?

10 MR. MCCARTY: I think. I'm not sure though.

11 THE PLAINTIFF: I need -- but I -- this -- this -- the  
12 way it is right now, I need this cleaned up because it's not  
13 true. What's here is not true.

14 THE COURT: Hold on, Ms. Veronese. I want to look at  
15 this order first.

16 (WHEREUPON, there was a pause in the proceedings, after  
17 which the proceedings resumed as follows.)

18 THE COURT: It was continued --

19 THE PLAINTIFF: For 30 days.

20 THE COURT: -- for 30 days. It was scheduled for July  
21 25th. It looks like you requested a continuance on July the  
22 2nd of 2025. It is continued one time to the next available  
23 motions term, and that's where we are today.

24 Ms. Veronese, tell me about your -- your affidavit. Have  
25 you got an affidavit from an expert?

1 THE PLAINTIFF: I don't.

2 THE COURT: A lawyer at this -- at this point?

3 THE PLAINTIFF: Not yet. I have been talking to the  
4 experts, and they always go back to the same story, the  
5 untruthful information in the case. I need to clean up the  
6 files. I need this -- I need to strike out of the files this  
7 information that they've entered that is false because --

8 THE COURT: Are you saying that's preventing you from  
9 getting an affidavit --

10 THE PLAINTIFF: Yes.

11 THE COURT: -- from an expert?

12 THE PLAINTIFF: Yes. Yes. Yep.

13 THE COURT: Hold on. I'm going to look at the statute  
14 for a second.

15 Ashley, have you got the statute? Will you pull up 15-  
16 36-100?

17 Y'all forgive my slowness on this computer.

18 THE PLAINTIFF: It's yours.

19 THE COURT: All right.

20 MR. MCCARTY: You obviously haven't seen mine, Judge.

21 THE COURT: I don't claim to be any kind of quick on the  
22 computer.

23 (WHEREUPON, there was a pause in the proceedings, after  
24 which the proceedings resumed as follows.)

25 THE COURT: Ms. Veronese?

1 THE PLAINTIFF: Uh-huh.

2 THE COURT: The statute says that the plaintiff must file  
3 as part of the complaint an affidavit of an expert witness,  
4 which must specify at least one negligent act or omission  
5 claimed to exist and the factual basis for each claim based on  
6 the available evidence at the time of the filing of the  
7 affidavit. There are some exceptions if --

8 THE PLAINTIFF: If it's the negligence that is common  
9 sense, like in the case in my case, it's absolutely common  
10 sense. It's known to anyone, including me.

11 THE COURT: The plaintiff may cure the alleged defect of  
12 not filing an affidavit by amendment within 30 days of service  
13 of the motion in this case that has been filed seeking to  
14 dismiss this action alleging that the affidavit is defective,  
15 and that's even claiming that there's a -- there's a -- an --  
16 an -- an affidavit which is defective.

17 MR. MCCARTY: Your Honor, for the record's sake, we filed  
18 our motion May 20th -- May 13th, 2025. I think most of the  
19 exceptions, if any --

20 THE PLAINTIFF: May 13th.

21 MR. MCCARTY: -- to the extent --

22 THE PLAINTIFF: But I was served -- I was served on  
23 Monday, the 28th of August -- 18th of August. So I think the  
24 valid official date that I was served is the 18th of August.

25 MR. MCCARTY: Well, I don't believe so, Your Honor. I

1 believe the service was well before that.

2 THE PLAINTIFF: I think that was the official date that I  
3 was served.

4 MR. MCCARTY: But the --

5 THE PLAINTIFF: Which when I received your documentation  
6 was -- it was --

7 MR. MCCARTY: I'll have to get --

8 THE PLAINTIFF: -- August 18th.

9 MR. MCCARTY: Other than being said, Your Honor, like I  
10 said, this -- this was continued for 30 days to allow her to  
11 get an affidavit. She hasn't gotten one.

12 THE PLAINTIFF: Your Honor, if we don't clean --

13 THE COURT: Hold on, Ms. -- Ms. Veronese.

14 THE PLAINTIFF: Yes. If we don't clean --

15 THE COURT: I can't take down but one thing at a time on  
16 -- on -- my court reporter can't -- can't get but one thing at  
17 a time. Okay?

18 Let me -- all right. I'm going to let -- Ms. Veronese,  
19 tell me about your -- tell me about your affidavit and why you  
20 believe you're not required to file the affidavit here.

21 THE PLAINTIFF: Your Honor, because the amount of lying  
22 in the filings that they said, well, it's unbelievable.  
23 Nobody can believe. I am from Brazil. I never saw anything  
24 like this. They told a different story, and I can prove in  
25 writing that it's false.

1           So when the -- when the expert looks into that, they  
2 think they had a conflict -- they had a conflict because of  
3 the lying because nobody can believe that attorneys are lying  
4 like this. Who's going to believe that an attorney filed in  
5 court a paper lying? The entire filing is lying. It's false.

6           THE COURT: All right.

7           THE PLAINTIFF: So I keep dancing because the expert  
8 keeps asking me, and I said it's not true. I can verify it's  
9 not true. Oh, but, you know, they had a conflict. What  
10 conflict?

11          You know, we need to clean these filings. Then I'll get  
12 the affidavit. Easy.

13          THE COURT: All right. Thank you, ma'am. Anything else  
14 you'd like to tell me?

15          THE PLAINTIFF: No, no. That's it.

16          THE COURT: All right. Thank you.

17          Mr. McCarty, your motion. I'll give you the last word.

18          MR. MCCARTY: Oh, Your Honor, very briefly.

19          Like I said, I think we're -- you know, these -- I think  
20 it's pretty clear this affidavit has not been filed, and it's  
21 not anywhere close to being filed. It's been -- this -- this  
22 relationship between these two parties began in 2021. They  
23 were notified -- she was notified, you know, in November of  
24 that year that they weren't going to take her case.

25          THE PLAINTIFF: Judge?

1 MR. MCCARTY: She's had from that time on basically to  
2 get an affidavit.

3 THE PLAINTIFF: Huh-uh.

4 MR. MCCARTY: But just for purposes of this thing, her  
5 complaint -- when her complaint was filed, it was April 29th.  
6 She knew -- the rule is clear. You've got to have an  
7 affidavit. There's -- trust me, there's a lot of malpractice  
8 cases I'd like to -- I'd like to file, but that affidavit is  
9 -- is an obstacle, and -- and it's a hard, fast rule.

10 The only possible exception other than the judge granting  
11 a continuance that I would think that she would have qualified  
12 for was some kind of statute of limitations issue, but that's  
13 only a 45-day issue, and we're now in the 120th day after she  
14 filed her complaint.

15 So it's -- I think it's clear this case needs to be  
16 dismissed --

17 THE PLAINTIFF: No.

18 MR. MCCARTY: -- as -- as the --

19 THE PLAINTIFF: Your Honor?

20 MR. MCCARTY: -- as a frivolous lawsuit.

21 THE PLAINTIFF: Can I say something else?

22 MR. MCCARTY: Plus, Your Honor, I still think -- I still  
23 think she's failed to state a claim in her complaint.

24 THE PLAINTIFF: No. Your Honor, I need the opportunity  
25 to be able to get this affidavit. This is not possible with

1 all this lying. He's lying now. It's not possible the  
2 attorney told me in November that he was going to leave the  
3 firm because he signed a demand letter to the defendant in the  
4 underlying -- underlying case in January, two months later.

5 So they are telling the entire story is false, and I -- I  
6 am the one that's -- you know, and he came over here, oh, we  
7 need to dismiss this case because it's been 120 days. If you  
8 hadn't lied, I would have an affidavit. You know, this is  
9 unbelievable.

10 THE COURT: Thank you, ma'am.

11 I need to look at these statutes and the material that's  
12 been filed in this case, and I will do that and get a decision  
13 as quickly as I possibly can.

14 Ms. Veronese, how do you get notice of any decisions that  
15 come from the Court? Are you signed up on the email for --

16 THE PLAINTIFF: Email?

17 THE COURT: -- email notification?

18 THE PLAINTIFF: I -- yeah, I can.

19 MR. MCCARTY: She is, Your Honor.

20 THE COURT: She is?

21 THE PLAINTIFF: All right.

22 THE COURT: Okay.

23 THE PLAINTIFF: No, I'm not signed up to receive the  
24 filings via email, no.

25 THE COURT: So you don't get those electronically from --

1 THE PLAINTIFF: No.

2 THE COURT: -- the Court?

3 THE PLAINTIFF: No.

4 THE COURT: When y'all get those, Brianna, how -- if  
5 they're not signed up, how will y'all do that?

6 THE CLERK: If she's --

7 THE PLAINTIFF: I have got --

8 THE CLERK: -- listed an email on there, she gets them.

9 THE COURT: She gets them?

10 THE CLERK: Yes.

11 THE COURT: Okay. Ms. Brianna here at the clerk's office  
12 tells me that you would get those if you listed an email  
13 address as part of any filings that you have. Did you list an  
14 email address?

15 THE PLAINTIFF: I did. Again, Your Honor, I accepted  
16 filings via email, and then I received mail from Mr. Wigger  
17 directly, his client directly, and it was very upsetting to  
18 me. So we --

19 THE COURT: Yes, ma'am. But you -- but you need -- as  
20 part of this case, you need to receive the -- the -- any  
21 filings that are made.

22 THE PLAINTIFF: I receive them in Boca Raton. I live in  
23 Boca Raton. I live in Florida. I received the letters from  
24 the Court over there.

25 THE COURT: Fine. How about email from the Court? How

1 did you get notification that there was a hearing today?

2 THE PLAINTIFF: Yeah. Ashley. Ashley, your -- your  
3 assistant?

4 THE COURT: Yeah. No, you -- you would have gotten it  
5 before we had gotten involved. You would have gotten some  
6 notice from the Court as to the -- as to the setting of this  
7 hearing today.

8 THE PLAINTIFF: Nothing. I --

9 THE COURT: How did you know about the hearing then?

10 THE PLAINTIFF: I looked on the website, and I saw Judge  
11 Doby in personal hearing August 21st. I looked on the site.

12 THE COURT: Do you indicate that there's an email  
13 address?

14 THE CLERK: I'm looking.

15 THE PLAINTIFF: You know, I -- but, your Honor, to be  
16 able to get the affidavit, I need the motion to strike. I  
17 need to strike this information from the filings.

18 THE COURT: Yes, ma'am. I'm trying to make sure about  
19 the email situation right now.

20 THE PLAINTIFF: Your Honor, is there a problem about the  
21 finder -- findings that are not true? Is this a problem for  
22 the Court or not?

23 THE COURT: What's your question, ma'am?

24 THE PLAINTIFF: Is the findings -- their findings that  
25 are not true, they are -- they are untruthful information. Is

1 that -- is it a problem for the Court or is not a problem?

2 THE COURT: What do you mean a problem?

3 THE PLAINTIFF: Like, is this something that is addressed  
4 by the Court or is it something that I have to deal with  
5 directly?

6 THE COURT: Are you asking me about the affidavit?

7 THE PLAINTIFF: No, I'm asking about the false  
8 information that they entered in the filings.

9 THE COURT: Yes, ma'am. And that's -- that's a legal  
10 question that I cannot answer for you. I have a specific duty  
11 and job as part of -- as part of being a judge, and one of  
12 those things that I can't do is I can't give you legal advice.

13 THE PLAINTIFF: Oh, I know.

14 THE COURT: I can't give Mr. McCarty legal advice either.  
15 It's not just you.

16 THE PLAINTIFF: I'm -- I'm kind of concerned. I'm kind  
17 of -- my question is, I haven't seen you mentioning, not even  
18 once, the motion to strike. I don't know if it's not --

19 THE COURT: All I've got in front of me today are the  
20 motions to dismiss.

21 THE PLAINTIFF: Uh-huh. So the motion to strike is not  
22 going to be even looked at?

23 THE COURT: No, ma'am. That was not before me. My  
24 roster only set up two motions to dismiss.

25 THE PLAINTIFF: Uh-huh.

1 THE COURT: And they were both filed by the defendant in  
2 this case.

3 THE PLAINTIFF: But, Your Honor, if you dismiss the case,  
4 we're never going to get to the motion to strike.

5 THE COURT: I don't know what I'm going to do in this  
6 case yet.

7 THE PLAINTIFF: Okay.

8 THE CLERK: Sir, I have an email showing.

9 THE COURT: All right. You have -- you have an email  
10 address listed on the Court's -- on the Charleston County  
11 Clerk of Court's website that they send you email  
12 notifications. If you want to update that, I'll let you  
13 update that, but they will -- I want to make sure that and you  
14 need to make sure that you get notification about any hearings  
15 or filings in this matter as well. Okay?

16 All right. Thank you, ma'am.

17 THE PLAINTIFF: Thank you.

18 THE COURT: Thank you, Mr. McCarty.

19 MR. MCCARTY: Yes, sir, Judge.

20 (WHEREUPON, the proceedings ended at 3:29 PM.)

21

22 --- END REQUESTED TRANSCRIPT ---

23

24

25



# **EXHIBIT 2**

Re: Case number 2025-CP-10-2069

---

From: Doby, S. Bryan Law Clerk (Ashley Curtis) (sdobylc@sccourts.org)

To: ikeithmccarty@gmail.com; cynthiamv123@yahoo.com; jwigger@wiggerlawfirm.com

Date: Friday, August 8, 2025 at 03:46 PM GMT-3

---

All,

The Judge can only hear what is on his roster. I see two motions to dismiss filed by Jarrel Wigger on the roster. That is what the Judge will hear. Other motions need to be filed and scheduled with the clerk of court. Thank you.

V/R

Ashley M. Curtis

Law Clerk to the Honorable S. Bryan Doby

Circuit Court Judge, Third Judicial Circuit

Post Office Box 93

123 S. Main St.

Bishopville, SC 29010

Cell: 501-240-6498

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**From:** keith mccarty <ikeithmccarty@gmail.com>

**Sent:** Friday, August 8, 2025 1:38 PM

**To:** Cynthia Veronese <cynthiamv123@yahoo.com>; Jerry Wigger <jwigger@wiggerlawfirm.com>

**Cc:** Doby, S. Bryan Law Clerk (Ashley Curtis) <sdobylc@sccourts.org>

**Subject:** Re: Case number 2025-CP-10-2069

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

The defendants object to the consideration of that motion on August 21st. Keith McCarty

On Fri, Aug 8, 2025 at 1:21 PM Cynthia Veronese <cynthiamv123@yahoo.com> wrote:

Good afternoon Ashley,

Judge Doby will hear the Defendants' Motion to Dismiss on August 21st, at 2.30PM.

---

I would like to ask, since I am having problems to obtain an expert witness affidavit due to unverifiable allegations in Defendants' pleadings, if Judge Doby could also hear my attached Motion to Impose Sanctions on the same day.

The original Motion was sent to the Court today to be filed.

Thanks,

Cynthia

(954) 556-6160

# **EXHIBIT 3**

Re: Case number 2025-CP-10-2069

From: Joy Johnson (jsjohnson@charlestoncounty.org)

To: cynthiamv123@yahoo.com

Cc: ikeithmccarty@gmail.com; sdobylc@sccourts.org; JSJohnson@charlestoncounty.org

Date: Friday, August 8, 2025 at 05:28 PM GMT-3

Good afternoon,

Ms. Curtis, am I being advised to schedule this additional motion? I do see where opposing counsel has objected to this motion being heard.

Joy S. Johnson  
Common Pleas Non-Jury Coordinator  
Charleston County Clerk of Court  
100 Broad Street Suite 106  
Charleston, South Carolina  
[jsjohnson@charlestoncounty.org](mailto:jsjohnson@charlestoncounty.org)  
843.958.5049

CourtPlus®

---

**From:** Cynthia Veronese <cynthiamv123@yahoo.com>

**Sent:** Friday, August 8, 2025 3:21 PM

**To:** Joy Johnson <JSJohnson@charlestoncounty.org>

**Cc:** Keith Mccarty <ikeithmccarty@gmail.com>; Doby S. Bryan Law Clerk (Ashley Curtis) <sdobylc@sccourts.org>

**Subject:** Fw: Case number 2025-CP-10-2069

**CAUTION:** This email originated outside of Charleston County. Do not click links or open attachments from unknown senders or suspicious emails. If you are not sure, please contact IT helpdesk.

Good afternoon Joy,

I submitted a motion to Judge Doby, but he said that any motions that will be heard need to be on his roster.

The hearing on the motions to dismiss was scheduled for the 21st at 2.30PM. I was wondering if you could include the attached Motion for Sanctions to be heard on the same day since the matter is interrelated, and hearing the motions to dismiss without the motion for sanctions will not make any sense.

Thanks,

Cynthia

# **EXHIBIT 4**

Re: Case number 2025-CP-10-2069

---

From: Doby, S. Bryan Law Clerk (Ashley Curtis) (sdobylc@sccourts.org)

To: cynthiamv123@yahoo.com

Cc: jsjohnson@charlestoncounty.org; ikeithmccarty@gmail.com; jwigger@wiggerlawfirm.com

Date: Tuesday, August 12, 2025 at 04:36 PM GMT-3

---

Ma'am,

You're welcome to argue and request for a continuance at the hearing on August 21st at 2:30pm. This would be proper, that way everything is on the court record. Please let me know if you have any questions.

V/R

Ashley M. Curtis

Law Clerk to the Honorable S. Bryan Doby

Circuit Court Judge, Third Judicial Circuit

Post Office Box 93

123 S. Main St.

Bishopville, SC 29010

Cell: 501-240-6498

---

**From:** Cynthia Veronese <cynthiamv123@yahoo.com>

**Sent:** Tuesday, August 12, 2025 9:59 AM

**To:** keith mccarty <ikeithmccarty@gmail.com>; Jerry Wigger <jwigger@wiggerlawfirm.com>; Doby, S. Bryan Law Clerk (Ashley Curtis) <sdobylc@sccourts.org>

**Subject:** Re: Case number 2025-CP-10-2069

\*\*\* **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good morning Honorable Judge Doby,

A hearing on the defendants' motion to dismiss was scheduled for August 21<sup>st</sup> at 2.30PM.

As the plaintiff in the above referenced case, I became aware of serious misrepresentations in the defendants filings, and their blatant breach of the Duty of Candor to this Court is affecting the outcome of this case, added to the fact that their defense counsel was already publicly reprimanded by the South Carolina Supreme Court in 2019 for actions involving misrepresentation.

A hearing on a motion to dismiss is not the place to have this discussion or to present evidence, and, in my view, a decision without first analyzing the deceptive facts that sustain their motions to dismiss and

---

also examining how the defendants' egregious misleading statements are prejudicing my ability to pursue this case will not contribute to the proper administration of Justice.

Therefore, I respectfully request this Court to grant a continuance of the hearing scheduled for next week so that my Motion for Sanctions can be properly heard and a thorough discussion about the facts of this case can bring out the truth and an informed decision can be made on their motions to dismiss.

Sincerely,

Cynthia Veronese  
(954) 556-6160

# **EXHIBIT 5**

## Opposition to Motion to Dismiss and Motion to Strike

---

From: Cynthia Veronese (cynthiamv123@yahoo.com)

To: sdobysc@sccourts.org; sdobylc@sccourts.org

Cc: ikeithmccarty@gmail.com

Date: Tuesday, August 19, 2025 at 03:17 PM GMT-3

---

Good afternoon Honorable Judge Doby,

Please find my Opposition attached for the hearing on Thursday at 2.30PM.

Additionally, due to the overwhelming number of false claims in the defendants' statements, I am filing a Motion to Strike portions of their Answer and respectfully requesting that it consolidated to be heard together during the hearing.

Respectfully,

Cynthia Veronese

(954) 801-0097

---



Plaintiff's Motion to Strike.pdf  
4.5 MB



Plaintiff's Opposition.pdf  
1.4 MB

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