

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

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Appellant, Cynthia Veronese, pursuant to Rule 212(b) SCACR, respectfully moves the Court and requests to amend her previous motion for augmentation of the record on appeal. The only additional item sought to be included is item #3, a Motion for Sanctions discussed in the emails previously submitted.

The Rule 212(b) SCACR provides that the Appellate Court may grant such other relief as may be just in the interest of justice, and authorizes the appellate court to correct or supplement the record when materials relevant to the issues on appeal were omitted through error, accident, or excusable neglect and supplementation is necessary for a full and fair review. The Rule authorizes the appellate court to order the addition of such documents if they are relevant to the issues before the appellate court and necessary for a fair determination of the case.

The Appellant respectfully requests to include the following documents to the Record on Appeal:

1. The transcripts of the August 21, 2025 hearing are already contained in the Record on Appeal. Appellant references them here only because they relate directly to the materials sought to be added by this motion. (ROA, pp. 89-109).

The following emails and Motion to Impose Sanctions were exchanged via email with Judge Bryan Doby, and also with the Court Coordinator. **All the materials included in this motion were considered by the trial court**, but are not formally part of the record due to excusable neglect.

In South Carolina, for a matter to be “before the court”, the judge only needed to have notice of the relief requested and an opportunity to rule on it. Appellant contends the Motion for

Sanctions was presented to the trial court and discussed in communications with the court and court staff, and the attached correspondence demonstrates the court had notice of the requested relief and directed Appellant concerning its presentation.

The emails below do not affect the Respondents, who received copies of these messages simultaneously. They are crucial to this appeal because they are directly relevant to demonstrate that the trial Judge first refused to hear the Appellant's Motion for Sanctions, then denied a continuance and instructed her to argue the Motion during the hearing on August 21, 2025, but the transcript reflects multiple interruptions while Appellant attempted to present her arguments and evidence she believes undermines Respondents' factual assertions.

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 Appellant 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 Motion for Sanctions.

4. 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 Appellant's Motion for Sanctions was never scheduled to be heard.

5. 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. Due to the denial of her request for a continuance, Appellant, who was scheduled to appear via videoconference, traveled from Brazil and appeared in person.

6. Appellant'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 Appellant filed this Motion to Strike with the Clerk of Court, in lieu of the attached Motion for Sanctions, because she located 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 Appellant's ability to obtain an expert affidavit.

In the end, both motions were not officially on the record because the trial judge did not allow the Appellant to argue either of them.

The Appellant contends that because materials outside the pleadings were twice submitted and not expressly excluded by the Court, the Respondents motions to dismiss under Rule 12(b)(6) should have been treated as motions for summary judgment under Rule 56. The trial judge had two opportunities to convert the Respondents' motions to dismiss into motions for



summary judgment, and to allow both parties to argue the evidence of their allegations, but failed to do so.

The addition of the materials contained in this motion are relevant to issues raised on appeal and are necessary for this Court's full understanding of the proceedings.

True and correct copies of the requested documents are attached to this motion as Exhibits 1 through 6.

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 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. (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 for good cause shown.

This Amended Motion to Augment the Record seeks to incorporate materials that bear upon the arguments already presented. The Appellant initially requested—and obtained—permission from Judge Doby to present oral arguments regarding the attached Motion for Sanctions; however, having subsequently discovered evidence crucial to the case, the Appellant converted that Motion for Sanctions—which had been submitted and considered by the trial

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.

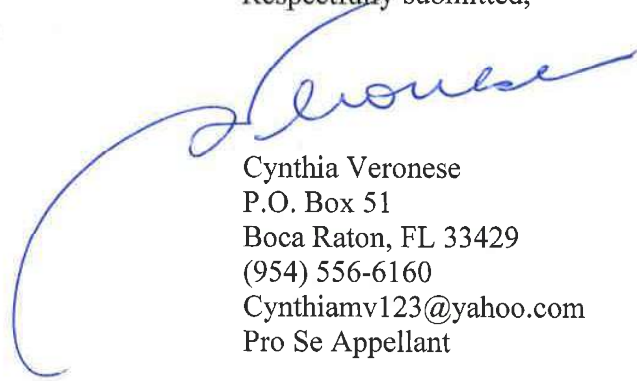
CONCLUSION

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 for good cause shown.

This Amended Motion replaces the original one filed on May 18, 2026.

June 15, 2026.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Cynthia Veronese', is written over the typed name and address. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Cynthia Veronese  
P.O. Box 51  
Boca Raton, FL 33429  
(954) 556-6160  
Cynthiamv123@yahoo.com  
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 first refused to hear the Appellant's Motion to Impose Sanctions, then denied a continuance and instructed her to argue her motion during the hearing of August 21, 2025, but interrupted her multiple times when she attempted to prove her case and present evidence that Appellant contends demonstrates material misrepresentations by the Defendants.
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 documents were included in the record. Furthermore, Appellant experienced a serious medical and family emergency involving her elderly mother during this period, which significantly disrupted her ability to manage the appeal and contributed to the inadvertent omission.
5. The foregoing circumstances constitute good cause, and Appellant should be allowed to add the attached documents to the record at this point.
6. The requested documents are attached to this Motion as Exhibits 1 through 6. 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 Amended 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.

June 15, 2026



Cynthia Veronese  
Pro Se Appellant

# **EXHIBIT 1**

|                          |   |                           |
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| 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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|-----------------------------------|--------------------|
| Motions to Dismiss.....           | 4                  |
| Under Advisement.....             | 16                 |
| Court Reporter Certification..... | 21                 |

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(No Exhibits Presented)

COURT REPORTER LEGEND

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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 taking 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 that 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

Get Outlook for iOS

---

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**



IN THE STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
FOR THE 9<sup>TH</sup> JUDICIAL CIRCUIT  
CASE NO.: 2025-CP-10-2069

**Cynthia Veronese**  
Plaintiff

v.

**PLAINTIFF'S MOTION TO IMPOSE  
SANCTIONS**

**Jarrel Wigger, and  
Wigger Law Firm, Inc.**  
Defendants

Now comes the Plaintiff, CYNTHIA VERONESE, and respectfully moves this Court to compel Defendants Jarrel Wigger and Wigger Law Firm and their defense attorney Mr. Ivon Keith McCarty to produce evidence, or to sanction them for breaching their Duty of Candor to this Court, attorney-client privilege and also their fiduciary duties towards Plaintiff as their misrepresentations are affecting this proceeding significantly. Defendants and defense counsel have been filing frivolous pleadings and engaging in frivolous conduct pursuant to Rule 11 of the South Carolina Rules of Civil Procedure and Section 15-36-10 of SC Code of Laws. In South Carolina, a frivolous pleading is defined as a document filed in a civil action that is not supported by reasonable grounds and is not intended to be a genuine effort to resolve a legal dispute. Also, as it will be described in this Motion, Defendants have violated the South Carolina Rules of Professional Conduct 1.3 Diligence, 1.4 Communication, 1.6 Confidentiality of Information, 1.7 Conflict of Interest, 1.9 Duties to Former Clients, 1.16 Terminating Representation, 3.3 Candor Toward the Tribunal, 5.1 Responsibilities of Partners, Managers, and Supervisory Lawyers, and 8.4 Misconduct.

### Statement of the Case

Plaintiff filed a Complaint against Defendants for legal malpractice on April 14, 2025, and respectfully requests this Court to instruct Defendants to explain the fallacious arguments in their filings so that the truth is finally known, or to sanction them.

After speaking with an expert witness, Plaintiff decided to check the credentials of their defense counsel. She was surprised to learn that Wigger Defendants hired for this legal malpractice case a lawyer who made headlines in 2019 when he was publicly reprimanded by the South Carolina Supreme Court for actions involving misrepresentation. Unfortunately, serious misrepresentations on their part are also happening in this case.

The continuation of this case depends on an expert witness affidavit, and the overwhelming false and deceitful articulations of the Defendants and their complete disregard for the Duty of Candor to this Court are confusing those who read the records. Plaintiff went through a bizarre situation when she contacted an expert witness, who reviewed the filings, concluded that the Defendants had a *conflict* and could not continue to represent her, and that they "*had*" to drop her as a client, therefore the expert could not provide her with an affidavit of merit. When the Plaintiff asked him what the conflict was as she was never made aware of any conflicts on the defendants' part, the expert witness answered that he did not know, and that Plaintiff should ask the defendants. Plaintiff respectfully requests this Court to inquire Defendants if they had a conflict of interest during the time they represented her, and, if it was the case, why they never informed her of it. Otherwise, Defendants must rectify their filings to reflect the truth.

Fiduciary duty constitutes a fundamental legal obligation requiring one party to act in the best interest of another. It encompasses fiduciary responsibilities that impose stringent ethical obligations, ensuring the fiduciary prioritizes the beneficiary's welfare above personal interests

or gain. Defendants have failed to adhere to their obligations towards the Plaintiff, and have breached their fiduciary duties of care, loyalty, and confidentiality.

In this Motion, Plaintiff will outline several challenges regarding Defendants' contentions, but the most important are text messages related to Plaintiff's underlying assault and battery claim which are protected by attorney-client privilege and were improperly attached to two of their filings under a false reason. On paragraph 17 of their Answer and then again on paragraph 29 of their Answer to Amended Complaint, they included privileged text messages along with a deceitful statement "*by way of Counterclaim*" alleging that "*when the Defendants pressed for any evidence of anything, even being with the alleged perpetrator, Plaintiff sent text messages stating that she had been drinking, she was drunk and her teeth were purple. She also thanked the other person by text for taking her to her air BNB and apologized for getting so drunk*".

The messages mentioned above are sensitive information and should have been protected and not exploited by Defendants for personal advantage. In an effort to mitigate the damages caused by their statements, Plaintiff contends that any person with minimum knowledge of a victim's counterintuitive behavior could explain Plaintiff's words in the above referenced text messages, and that it is disheartening that Wigger Defendants decided to unethically use the messages to embarrass her to their advantage. The Plaintiff has already been shamed and suffered very much, but being described in such an unfair, unfavorable and humiliating manner, and having to observe an expert agreeing with disingenuous Defendants while completely ignoring the truth, what she went through, and her pain, is much more than she can handle.

Defendants engaged in frivolous litigation when they misrepresented facts of this case to this Court in order to create a manipulative opportunity to improperly attach privileged text messages to this lawsuit.

WhatsApp - Cynthia Veronese

To: [jwigger@wiggerlawfirm.com](mailto:jwigger@wiggerlawfirm.com)

Date: Wednesday, August 11, 2021 at 06:01 PM GMT-3

Please find attached the WhatsApp thread ~~in reference to the above~~

Thanks,

**In their filings, Defendants' also made the following misleading statements:**

4

she was not aware or concurred with their actions. Defendants provided misleading information, breaching their Duty of Candor to this Court.

2. *“Plaintiff was further told that without any witness or better information than she had provided, Defendant Wigger Law Firm would be closing her file around the time the associate attorney assigned to her file was leaving the employment of Defendant Wigger Law Firm, in November of 2021”, and “The Plaintiff’s verbal notice in November of 2021 that the file was being closed, was followed up in writing on April 18, 2022, some **five months** prior to the statute of limitations running.”* These are all very clear misrepresentations of facts. If it were true that the first associate attorney assigned to her file, Mr. Edward McAlpine, gave the Plaintiff verbal notice that he was leaving the firm in November of 2021 and that Wigger Law Firm was closing her file before he left, he could not have signed the first letter to the defendant on November 16, 2021 (Exhibit 3) and the second one two months later, on January 18, 2022 (Exhibit 4). Also, neither of them notified Plaintiff about Mr. McAlpine’s departure. Plaintiff is attaching a snapshot of Edward McAlpine’s LinkedIn page (Exhibit 5), showing that he worked for Wigger Law Firm from May of 2021 until January of 2022.

In their filings, Defendants also denied the period of time in which they represented the Plaintiff, and she is attaching their fee agreement showing the date they were retained on August 14, 2021 (Exhibit 1), and proof that Mr. Ryan McKaig, the second associate attorney assigned to her case, closed Plaintiff’s file without prior notice with an email (Exhibit 6) and a termination of representation letter (Exhibit 7) on April 19, 2022, **two months and three weeks prior to the Statute of Limitations expiring on July 11, 2022**, and not “some five months prior to the statute of limitations running”.

It is clearly stated on their Fee Agreement that the incident happened on July 11, 2019 (Exhibit 1). If Defendants falsely stated that they dropped Plaintiff's case five months before the running of the Statute of Limitations rather than reporting the correct remaining time of two months and three weeks to this Court, it is because they know there was insufficient time for proper investigation by other counsel, and that a conflict of interest was created because they placed the interests of the defendant in her underlying claim above the interests of the Plaintiff, thus breaching their fiduciary duty of loyalty towards her.

3. *"Wigger Defendants fulfilled any and all existing legal duties it owed to Plaintiff **under contract** and applicable law."*

By abruptly terminating their attorney/client relationship without any prior notice too close to the running of the statute (Exhibit 7), and failing to take reasonable steps to protect Plaintiff's interests, such as giving her reasonable notice and allowing her time to retain new counsel, Defendants breached their contract, which states that "Attorneys may withdraw at any time by giving reasonable **written** notice and the **client agrees** to sign substitution of attorneys in the event of withdrawal" (Exhibit 1), and also their fiduciary duties.

4. *"Plaintiff had some attorneys contact Defendant Wigger Law Firm indicating Plaintiff's evidence for the case was with Wigger Law Firm and they could contact us for all of the evidence – which what little there was actually was bad for her."* Plaintiff could never have indicated that evidence for the case was with Wigger Law Firm as there was absolutely nothing that anyone else could have contacted them for because they did nothing for more than 8 months. Plaintiff respectfully requests this Court to ask Defendants when they say *"which what little there was actually was bad for her"*, if they are referring to the same privileged text messages mentioned above. If this is the case, Plaintiff respectfully requests this Court to strike such improper reference

off the record as Defendants are improperly waiving a privilege that belongs to Plaintiff, and breaching their fiduciary duty of confidentiality. Also, Plaintiff never gave them consent to speak about details of her case to anyone.

5. *“Defendants investigated the Plaintiff’s alleged claims and declined to pursue them, which is well within the standard of care for any Plaintiff’s attorney”*. Included in their termination of representation letter there was a **final bill of \$35** for the entire period of time Wigger Law Firm kept Plaintiff’s case (Exhibit 7), in reference to just the fee to open her client file (\$35 was the total amount charged), which demonstrates that no investigation was ever performed, and that the standard of care was breached and a conflict of interest was created because Defendants placed the interests of the defendant in her underlying claim above hers, leaving Plaintiff with insufficient 2 ½ months to investigate the case and file it “pro se”. If an investigation had been conducted, there would have been costs involved, and the final invoice presented to Plaintiff would not have been for only \$35 for the fee to open her file.

The settlement target for the underlying personal injury claim was within a possible target of \$550,000 to \$600,000+, according to experienced South Carolina personal injury attorneys. In summary, had Defendants exercised the same legal skill as a reasonably competent attorney and had they taken reasonable care in determining and implementing a strategy to be followed to achieve Plaintiff’s legal goals, had they encouraged her to contact law enforcement and file a police report, had they investigated to find out whether other women inside and outside the company had any altercations or uncomfortable situations with Defendant in her personal injury claim, had they attempted to obtain a copy of the customer’s payment receipt showing that Plaintiff and the other person were at that particular restaurant, had they presented her doctor’s note and accepted the doctor’s testimony on her behalf for trial, had terminated the attorney/client



relationship in a timely manner rather than dropping the case too close to the end of the statutory deadline without notice, Plaintiff would not have suffered such harm. There is still doubt as to the real reason why the defendants were negligent. Their delay in obtaining evidence is not convincing.

Defendants' negligence, contrary to the interests of their former client, resulted in substantial financial harm and caused Plaintiff damages in excess of \$465,000. Plaintiff succeeded in her underlying action, but obviously the settlement reached by a layperson without a lawyer will never be the same as an agreement worked out by a competent lawyer interested in the case.

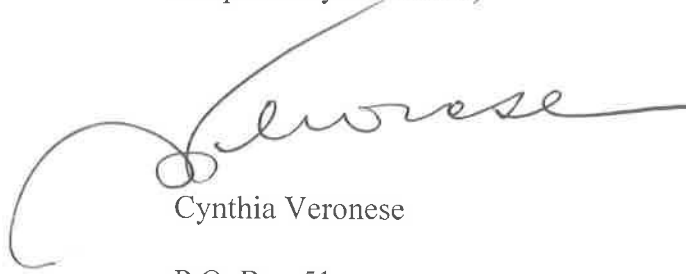
### CONCLUSION

Plaintiff respectfully moves this Court to compel Defendants Jarrel Wigger and Wigger Law Firm and their defense attorney Mr. Ivon Keith McCarty to produce evidence, or to sanction them for breaching their Duty of Candor to this Court, attorney-client privilege and also their fiduciary duties towards the Plaintiff, as their misconduct is significantly affecting this proceeding.

Defendants violated fundamental legal concepts by intentionally and repeatedly filing egregious misrepresentations, in a clear breach of their ethical obligations. As Defendants repeated and improper disclosures were atrocious and very harmful, Plaintiff respectfully requests this Court to strike off the records the Defendants' Answer to Complaint and also their Answer to Amended Complaint and related Counterclaims, which were all based on false allegations, and enter a default judgment in her favor, including appropriate remedies.

Charleston, South Carolina, August 7, 2025

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'C. Veronese', with a large, elegant loop at the beginning.

Cynthia Veronese

P.O. Box 51  
Boca Raton, FL 33429  
(954) 556-6160  
Cynthiamv123@yahoo.com

FEE AGREEMENT

In consideration of legal services to be rendered by WIGGER LAW FIRM, the undersigned client retains said attorneys to prosecute all claims arising out of injuries as a result of an incident on July 11, 2019. The attorneys accept said employment and are authorized to effect a settlement or compromise, subject to client(s) approval, or to institute such legal action, or actions, as may be advisable in attorney's judgment, in order to enforce client's rights.

The attorney's fee shall be a sum equal to one third (1/3) of any amount recovered by compromise or settlement prior to filing suit and forty (40%) of any amount recovered after suit and/or arbitration proceedings have been filed, whichever is greater. The fee amount is taken out of the gross amount of the settlement prior to the deduction of case costs. If the case is tried in a court of original jurisdiction and is appealed for any reason by the Plaintiff or the Defendant, the appeal is a separate matter and the fee for that portion of the case will be negotiated and agreed upon prior to the attorney acting on the appeal. If no recovery is obtained, no fee shall be payable to attorneys, except as provided below, in the event of termination.

Attorneys may advance costs, and said advance shall be deducted from any recovery and returned to the attorneys at the time of disbursement of the funds. Payment of costs may include, but are not limited to investigation, experts' fees, copies, photographs, long-distance phone calls, computer-assisted research, court costs, mileage, postage, etc. and will remain the responsibility of clients regardless of the outcome of the matter. Associate counsel may be employed at the discretion and expense of the attorneys. Attorneys shall have a lien on said claim, suit or recovery for any fees and expenses.

Attorneys may withdraw at any time by giving reasonable written notice and the client agrees to sign substitution of attorneys in the event of withdrawal. If the client terminates the services of the attorneys before a final recovery is achieved, the attorneys will have the right to a reasonable fee based on services rendered and time expended. The fee will be the higher of either: (1) one third (1/3) of any offer received prior to the client terminating the services, plus costs; or (2) will be calculated at the rate of \$350.00 an hour for a partner and \$200.00 an hour for an associate for attorney services and \$75.00 for paralegal services, plus costs.

In recognition of my lawyer's co-ownership interest in the proceeds of this legal matter, and to secure payment by me to WIGGER LAW FIRM of all expenses, court costs and attorney's fees I am obligated to pay under this retainer agreement, I hereby grant to WIGGER LAW FIRM a charging lien applicable to any and all recoveries on my claims or causes of action, whether by settlement, collection of a judgment, or otherwise. I understand that the charging lien may be used to protect my lawyer's fee to reasonable compensation for work done in the event I discharge my lawyer. We further agree that, as of the date of this contract the value of any of my claims or causes of action is speculative and is dependent upon the services of counsel for its potential to be realized.

DATE: AUGUST 14, 2021

CLIENT: Veronese

Cynthia Veronese

Fw: Update

EXHIBIT 2

From: Cynthia Veronese (cynthiamv123@yahoo.com)

To: jwigger@wiggerlawfirm.com

Date: Thursday, April 21, 2022 at 05:03 PM GMT-3

Good afternoon Jerry,

I received this email from Ryan. On his letter he states that there was a thorough investigation but Tabitha just forwarded to me a copy of the entire file and nothing was done. Sending two letters was all that was done in 8 months. We are now 2 1/2 months from the end of the Statute of Limitations for my case and no Law Firm will take it because there is no time to do what needs to be done. If you didn't feel that there was enough evidence to proceed you should have told me right away but your firm did no investigation.

I trusted you in a situation that is very painful to me and the only result that I got was to spend months asking your employees for updates about the case and getting pushed around. By closing my case now you are taking away from me any possibility of justice.

Please advise.

Thanks,

Cynthia

----- Forwarded Message -----

From: Ryan McKaig <rmckaig@wiggerlawfirm.com>

To: Tabitha Oros <toros@wiggerlawfirm.com>; Cynthia Veronese <cynthiamv123@yahoo.com>

Sent: Tuesday, April 19, 2022, 03:48:13 PM GMT-3

Subject: RE: Update

Ms. Veronese,

Attached please find a copy of a letter we've sent you letting you know that we've closed the file. I wish I had better news for you, but we just don't have enough evidence to proceed. Don't hesitate to call me if you have any questions.

Ryan McKaig

EXHIBIT 3

# Wigger Law Firm, Inc.

ATTORNEYS AT LAW

JARREL L. WIGGER\*  
EMILY H. TONG

100 S. Main Street, Ste. D  
Summerville, SC 29483

(843) 851-9900  
(843) 851-9044 Fax

North Charleston  
(843) 553-9800

EDWARD J. MCALPINE, III (TREY)

West Ashley  
(843) 203-1500

\* Board Certified Civil Trial Specialist  
By National Board of Trial Advocacy

November 16, 2021

VIA MAIL

Timothy James Huobler  
CEO of Giant Cement/Elementia  
1006 W. Greens Road, Ste. 1300  
Houston, TX 77067

Dear Mr. Huobler:

Please be advised that I represent Ms. Cynthia Veronese. Ms. Veronese indicates you committed a number of bad acts after meeting you out for what was purported to be a business meeting. Kindly forward this letter to your insurance carrier and request they contact me immediately. If you are not insured, please call my office as soon as possible to discuss this case.

If you have any further questions, please contact my office as soon as possible to discuss this case.

If I do not receive the insurance information or do not hear from you, I will have no other choice but to take further legal action.

Sincerely,

Trey M-3

Edward J. McAlpine, III, Esq.

EJM3/wv



Exhibit 4

# Wigger Law Firm, Inc.

ATTORNEYS AT LAW

JARREL L. WIGGER\*  
EMILY H. TONG

EDWARD J. MCALPINE, III (TREY)

\*Board Certified Civil Trial Specialist  
By National Board of Trial Advocacy

100 S. Main Street, Ste. D  
Summerville, SC 29483

(843) 851-9900  
(843) 851-9044 Fax

North Charleston  
(843) 553-9800

West Ashley  
(843) 203-1500

January 18, 2022

**VIA MAIL**

Timothy ~~James Kneller~~  
~~11000 Alton Cement Plant~~  
~~956 W. Greens Road, Ste. 300~~  
Houston, TX 77067



**MAILED**

1/18/22 TBO

Dear Mr. ~~Kneller~~:

Please be advised that I represent Ms. Cynthia Veronese. Ms. Veronese indicates you committed a number of bad acts after meeting you out for what was purported to be a business meeting. Kindly forward this letter to your insurance carrier and request they contact me immediately. If you are not insured, please call my office as soon as possible to discuss this case.

If you have any further questions, please contact my office as soon as possible to discuss this case.

If I do not receive the insurance information or do not hear from you, I will have no other choice but to take further legal action.

Sincerely,

Edward J. McAlpine, III, Esq.

EJM3/tbo

EXHIBIT 5

//www.linkedin.com/in/edward-j-mcalpine-iii-trey/



Search



**Edward J. McAlpine, III (Trey)**

Associate Attorney at Pierce, Sloan, Kennedy & Early LLC

## Experience



### **Associate Attorney**

Pierce, Sloan, Kennedy & Early LLC · Full-time

Jan 2022 - Present · 3 yrs 8 mos

Charleston, South Carolina Metropolitan Area

♥ Civil Litigation



### **Associate Attorney**

Wigger Law Firm, Inc. · Full-time

May 2021 - Jan 2022 · 9 mos

Summerville, South Carolina, United States

♥ Civil Litigation

Exhibit 6

RE: Update

From: Ryan McKaig (rmckaig@wiggerlawfirm.com)

To: toros@wiggerlawfirm.com; cynthiamv123@yahoo.com

Date: Tuesday, April 19, 2022 at 03:48 PM GMT-3

Ms. Veronese,

Attached please find a copy of a letter we've sent you letting you know that we've closed the file. I wish I had better news for you, but we just don't have enough evidence to proceed. Don't hesitate to call me if you have any questions.

Ryan McKaig

Em quinta-feira, 7 de abril de 2022 17:01:30 BRT, Tabitha Oros <toros@wiggerlawfirm.com> escreveu:

You actually have a different attorney assigned now. Attorney Ryan McKaig will be overseeing and I am reviewing the file with him.

Thanks!

Tabitha B. Oros

Claims Paralegal

Wigger Law Firm, Inc.

100 South Main Street – Suite D

Summerville, SC 29483

' 843-851-9900

7 843-851-9044

toros@wiggerlawfirm.com



Save a tree. Don't print this e-mail unless necessary.

CONFIDENTIAL COMMUNICATION

Unless otherwise indicated or obvious from the nature of the preceding communication, the information contained therein is Attorney/Client privileged and confidential information/work product. The communication is intended for the use of the individual or entity to whom it was



EXHIBIT 7

# Wigger Law Firm, Inc.

ATTORNEYS AT LAW

JARREL L. WIGGER\*  
EMILY H. TONG

100 S. Main Street, Ste. D  
Summerville, SC 29483

(843) 851-9900  
(843) 851-9044 Fax

North Charleston  
(843) 553-9800

EDWARD J. MCALPINE, III (TREY)  
AUSTIN C. MACMANUS  
CHRISTOPHER F. LUTZ

West Ashley  
(843) 203-1500

April 18, 2022

\*Board Certified Civil Trial Specialist

By National Board of Trial Advocacy

VIA USPS AND E-MAIL: [cynthiamv123@yahoo.com](mailto:cynthiamv123@yahoo.com)

Cynthia Veronese

P.O. Box 52

Boca Raton, FL, 33429

RE: Your Case

Dear Ms. Veronese:

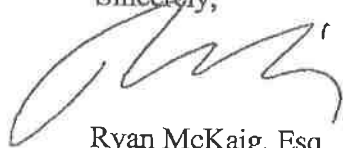
After a thorough investigation of your claim against Timothy James Knabler, I have found very little evidence to support your case. Therefore, we are closing your file with our firm and will take no further action on your behalf.

I am required to inform you that there is a statute of limitations for any potential claim you may have regarding your case. The statute of limitations is three (3) years from the date of the issue you allege. If you fail to file suit within that period, you will be forever barred from doing so. I strongly encourage you to seek the advice of another attorney, as another attorney may view your case differently. Should you have any questions regarding this matter, please contact my office.

We have incurred \$35.00 in costs on your case. Your agreement with our firm states that you will reimburse our case costs regardless of the outcome of the case. Please forward that payment as soon as possible, or contact my paralegal, Tabitha, to discuss payment arrangements.

I am sorry that we were unable to assist you with your case, and I wish you luck in the future.

Sincerely,



Ryan McKaig, Esq.

MRM/tbo

# **EXHIBIT 4**

Re: Case number 2025-CP-10-2069

---

From: Joy Johnson (jsjohnson@charlestoncounty.org)

To: cynthiamv123@yahoo.com

Cc: ikeithmccarty@gmail.com; sdobyle@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®

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**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) <sdobyle@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 5**

Re: Case number 2025-CP-10-2069

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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

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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

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**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

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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 6**

## 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

**RECEIVED**

**Jun 19 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

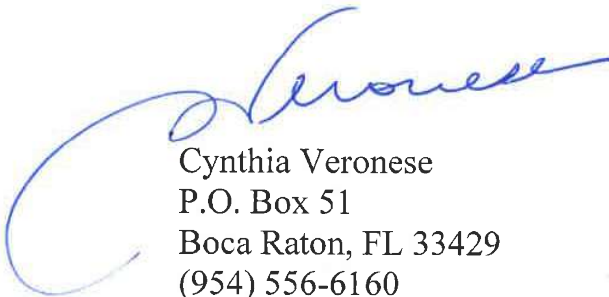
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PROOF OF SERVICE

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I certify that I served a copy of the *Appellant's Amended Motion to Augment the Record on Appeal and for an Extension of Time in Which to File Appellant's Brief* upon Jarrel Wigger and Wigger Law Firm, Inc., by sending a copy via UPS (tracking number 1Z2R3F650315562421), addressed to their counsel of record, Keith McCarty, at 768 St Andrews Blvd, Charleston, SC, 29407.

June 15, 2026



Cynthia Veronese  
P.O. Box 51  
Boca Raton, FL 33429  
(954) 556-6160  
Cynthiamv123@yahoo.com  
*Pro Se Appellant*