

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Eugene P. Warr, Jr., Circuit Court Judge

Appellate Case No. 2026-000211
Circuit Court Case No. 2025-CP-10-03621

RECEIVED

Oct 26 2026

SC Court of Appeals

Joel Ndunda,

Appellant,

v.

Brandi Pfeil, LP-A, Crisis Intervention Employee, individually and officially;
Caitlyn McGarty, Crisis Intervention Employee, individually and officially;
South Carolina Department of Behavioral and Developmental Disabilities,
Office of Mental Health; and Charleston Dorchester Mental Health Center,

Defendants,

Of which Brandi Pfeil, Caitlin McGarty, and The South Carolina Department
of Behavioral Health and Developmental Disabilities are the

Respondents.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Brian L. Quisenberry (SC Bar No. 73637)
Russell G. Hines (SC Bar No. 72100)
Zachary M. Kern (SC Bar No. 103731)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Respondents

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **INITIAL BRIEF OF RESPONDENTS** and **RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were, on October 26, 2026, emailed, and the following day placed in the U.S. Mail, to Appellant at the respective email and mailing addresses below:

Joel Ndunda
4015 Laurelwood Drive
Charleston, SC 29414
geospatial02@outlook.com

Appellant

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Respondents

Charleston, South Carolina

October 26, 2026

Hines, Russell

From: Hines, Russell
Sent: Monday, October 26, 2026 11:56 PM
To: 'geospatial02@outlook.com'
Cc: Kern, Zachary (Zach); Justman, Barbara; Justman, Aimee; Quisenberry, Brian; Brown, Stephen L.
Subject: Ndunda v. Pfeil (2026-000211) -- Initial Brief of Respondents and Respondents' Designation of Matter
Attachments: Ndunda v. Pfeil (2026-000211) -- Initial Brief of Respondents.pdf; Ndunda v. Pfeil (2026-000211) -- Respondents' DOM.pdf

Attached please find the **Initial Brief of Respondents** and **Respondents' Designation of Matter to be Included in the Record on Appeal**.

Russell G. Hines
CLEMENT RIVERS, LLP
www.ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
Phone: (843) 720-5488
Fax: (843) 579-1327
Email: rhines@ycrlaw.com

RECEIVED
Oct 26 2026
SC Court of Appeals



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com