RECEIVED
Oct 26 2026
SC Court of Appeals

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

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.

RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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

Respondents propose that the following be included in the record on appeal (with any duplicative matter to appear in the record only once):

1. Summons & Complaint, filed June 24, 2025;

2. Defendants' Motion to Dismiss, filed July 25, 2025;

3. Defendants' Motion to Strike Punitive Damages, filed July 25, 2025;

4. Plaintiff's Memorandum in Opposition to Defendants' Motion to Dismiss and Motion to Strike Punitive Damages, filed August 8, 2025;

5. Affidavit of Dr. Mutindi Ndunda, filed August 8, 2025;

6. Affidavit of Thomas Ndunda Ndambuki, filed August 8, 2025;

7. Affidavit of Leilei Zhang, filed August 8, 2025;

8. Memorandum in Support of Defendants' Motion to Dismiss, filed October 7, 2025;

9. Transcript of Hearing held October 9, 2025;

10. Plaintiff's Memorandum in Opposition to Defendants' Motion to Dismiss, filed October 13, 2025;

11. Plaintiff's Emergency Motion for Sanctions, Adverse Inference, and Referral for Criminal Investigation Based on Defendants' Admission of Judicial Corruption and Fraud on this Court, filed October 21, 2025;

12. Plaintiff's Supplemental Filing in Support of Emergency Motion for Sanctions, Adverse Inference, and Referral for Criminal Investigation Based on Defendants' Admission of Judicial Corruption and Fraud on this Court: Audio Recording Proving Fraud on this Court, filed October 27, 2025;

13. Order Granting Defendants' Motion to Dismiss Plaintiff's Complaint With Prejudice, filed November 34, 2025; and

14. Notice of Appeal, served December 1, 2025.

I certify that this designation contains no matter irrelevant to this appeal.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

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

Charleston, South Carolina

October 26, 2026