

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2012-CP-17-295

Ebony Bethea.....Appellant,

v.

Derrick Jones, John Doe, Individually and
As employee/agent of Citi Trends, Inc., Citi
Trends, Inc., and Palmetto Properties, Inc.

Of Whom Citi Trends, Inc., and Palmetto
Properties, Inc. are.....Respondents.

SUPPLEMENTAL RECORD ON APPEAL

Eric M. Poulin, Esquire
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2557 Ashley Phosphate Road
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Attorney for Appellant

RECEIVED

SEP 15 2014

SC Court of Appeals

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Attorney for Respondent Palmetto Properties, Inc.

INDEX

Affidavit of William F. Booth, Page 11.....	2
Certificate of Counsel.....	3
Certificate of Service.....	4

My opinions in this case are as follows:

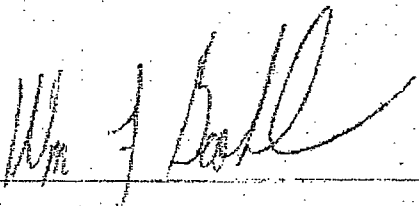
Foreseeability:

A violent crime such as attempted murder using a gun was not foreseeable to Citi Trends in December of 2010. The shooting of Ebony Bethea by her ex-boyfriend Derrick Jones on December 27, 2010 in Citi Trends in Dillon, South Carolina was not foreseeable by Citi Trends. The security measures that Citi Trends had in place on that date were reasonable and met the standards for a retail store on that date in that location. Information that is being relied upon by the plaintiff, as testified to by her expert Michael Hodge, is not reliable or valid and, in many cases, simply not true.

Deterability:

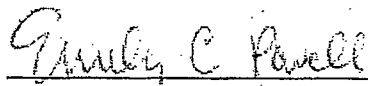
There are no reasonable measures that could have been in place at Citi Trends that would have deterred Derrick Jones from shooting Ebony Bethea on December 27, 2010 at Citi Trends. Reasonable measures that Plaintiff's Expert Michael Hodge recommends were already in place at Citi Trends.

This the 3rd day of January, 2014.



WILLIAM F. BOOTH, CPP

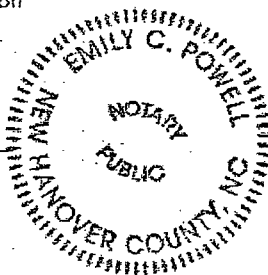
Sworn to and Subscribed before me on
This 3rd day of January, 2014.



NOTARY PUBLIC

New Hanover County, NC

My Commission Expires: March 30, 2014



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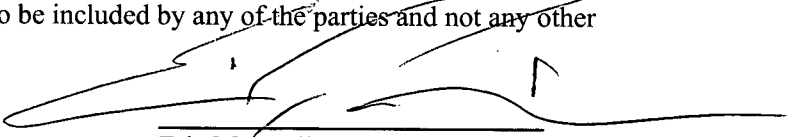
Of Whom Citi Trends, Inc.,
and Palmetto Properties, Inc.,
are,

Respondants.

CERTIFICATE OF COUNSEL

The undersigned hereby certifies that the Record on Appeal and Supplemental Record on Appeal contain all material proposed to be included by any of the parties and not any other materials.

August 28, 2014



Eric M. Poulin
S.C. Bar No.: 100209
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CERTIFICATE OF SERVICE

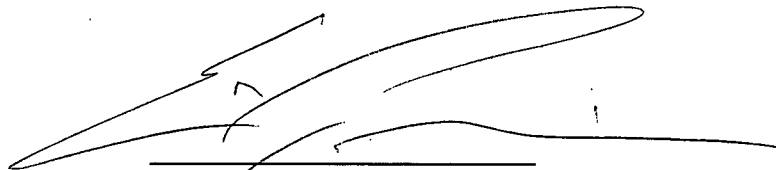
The undersigned certifies that I have served a copy of the Supplemental Record on Appeal on the individuals named below by hand delivery or by depositing a copy in a first class pre-paid envelope in the United States mail at North Charleston, South Carolina as follows:

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[Signature on following page]

August 28, 2014

A handwritten signature in black ink, appearing to read 'Eric M. Poulin', is written over a horizontal line.

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