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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DILLON COUNTY
J. Michael Baxley, Circuit Court Judge

Case Nos. 2008-CP-17-0376
2008-CP-17-0377

Claude W. Graham, ... Respondent-Appellant,

v.

Town of Latta, South Carolina, ... Appellant-Respondent.

AND

Vickie B. Graham, ... Respondent-Appellant,

v.

Town of Latta, South Carolina, ... Appellant-Respondent.

PETITION FOR REHEARING

The Appellant-Respondent Town of Latta petitions the South Carolina Court of Appeals for a rehearing of the Court's recent decision in *Graham v. Town of Latta*, Op. No. 5398 (S.C. Ct. App. filed March 30, 2016).

The grounds for the Appellant-Respondent's petition for rehearing are addressed in detail in the supporting memorandum filed herewith and incorporated herein.

The Appellant-Respondent's petition for rehearing is based on the Court's decision in *Graham v. Town of Latta*, Op. No. 5398 (S.C. Ct. App. filed March 30, 2016); the supporting memorandum filed herewith; the briefs and Record on Appeal; Rule 221(a), SCACR; Rule 224, SCACR; and other rules of court.

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April 14, 2016

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MEMORANDUM IN SUPPORT OF APPELLANT-RESPONDENT'S PETITION FOR REHEARING

The Appellant-Respondent Town of Latta has petitioned this Court for a rehearing of the recent decision in *Graham v. Town of Latta*, Op. No. 5398 (S.C. Ct. App. filed March 30, 2016). The Town of Latta respectfully submits that the following points were overlooked or misapprehended by this Court:

I. Discretionary Immunity

This Court affirmed the denial of discretionary immunity, and in doing so, disregarded how that issue was addressed and adjudicated by Circuit Court Judge Alison Lee. The Town submits that based on Judge Lee's own rulings -- which the Grahams have not appealed -- the discretionary immunity test has been met as a matter of law. This Court has overlooked this issue. More particularly, this Court failed to focus on and address the actual error that Judge Lee made in denying discretionary immunity.

To recap, in denying the Town's directed verdict motions, Judge Lee stated: "while I believe that there has been some exercise of discretion or judgment, I think it becomes a jury question to determine whether or not there would have been a breach of duty in failing to take action." (R. 651). Judge Lee further ruled:

> The way I view the evidence is that there were basically four competing choices in addition to the underlying dispute as to whether or not there is a leak or not. But if the considerations of the Town would – there would have been four options. The three that were discussed was

> move the line, put a sleeve in it, or I think put some glue or whatever in it or whatever was the appropriate terminology is or do nothing. While I understand that they weighed those options, I still believe that the jury could make the decision. I understand that they weighed the options, and their option was to do the fourth; that was to do nothing.
>
> And I understand that that was primarily because they did not believe that there was a leak in the line. So I think it becomes a question for the jury to decide, first of all, whether or not there was a leak; and second of all, whether exercising that particular option would have been a breach of the duty. And the duty is to maintain the system and [to] maintain the lines. And so I think that becomes a jury question.

(R. 651-652).

That oral ruling denying the directed verdict motion was later echoed by Judge Lee in her written order denying the JNOV motion. In her Order filed March 8, 2013, Judge Lee wrote:

> Defendant claims that the testimony of Mike Hanna established that Defendant considered and weighed competing alternatives, and then used accepted professional standards in deciding that there was nothing needed to be done regarding the portion of its sanitary sewer and drainage system at issue. Testimony was given at trial that Defendant was presented with several choices to remedy the drainage problem: move the pipe on Plaintiffs' residence, add a sleeve to insulate the pipe, fix any crack or leak with concrete or glue, or do nothing. Testimony was also presented that Defendant conducted smoke tests to determine whether there was a defect, and attempted to snake a camera through the line, then made a decision not to repair the pipe.

(R. 12). Judge Lee then viewed the issue as one of duty rather than immunity, which is precisely where the error occurred. She concluded:

> Whether Defendant breached its duty to maintain its drainage system by failing to exercise one of the options available to fix the flooding at Plaintiffs' residence was a question for the jury. *See Steinke v. South Carolina Dept. of Labor, Licensing and Regulation,* 336 S.C. 373, 520 S.E.2d 142 (1999). The jury considered the evidence of whether Defendant's inaction constituted maintenance and rejected the discretionary immunity provision of the Tort Claims Act. Because there is evidence to support the jury's verdict, Defendant's Motion for JNOV on the grounds that Plaintiffs' negligence claim is barred by application of the South Carolina Tort Claims Act is DENIED.

(R. 13).

Importantly, Judge Lee concluded that the Town had satisfied the proof requirements for discretionary immunity. Her error was concluding that the issue was still one for the jury because "I think it becomes a jury question to determine whether or not there would have been a breach of duty in failing to take action." (R. 651).

Instead of focusing on the issue as it was adjudicated by the trial court, this Court makes a conclusory determination that "[t]here was ... no expert testimony indicating the Town actually weighed the competing considerations or that the Town utilized professional standards in choosing to 'do nothing.'" Slip. Op. at 14. That is contrary to the unappealed rulings by Judge Lee. She already determined

that the Town weighed competing considerations and had utilized professional standards.

Moreover, this Court has disregarded the evidence in the record that shows that the Town did, in fact, weigh competing considerations and did utilize professional standards. As Judge Lee agreed, the record shows that the Town, acting through the Town engineer, weighed several options and exercised discretion in deciding not to perform any work on the sewer pipe that crosses the Grahams' property. That exercise of discretion was based upon accepted professional standards as was testified to by the Town's engineer, Mike Hanna, and as confirmed by Roger Davis, the Grahams' own expert.

To recap, Mike Hanna is employed by B.P. Barber Company, which is an engineering firm, and has served as the Town's engineer on its water and sewer systems since 1997. (R. 519). In response to the Grahams' complaint, Hanna recommended several steps to be taken. First, B.P. Barber under Hanna's direction performed a physical survey of all manholes and then followed that with smoke testing of the entire sewer system, including the areas in the vicinity of the Graham residence. (R. 528-531). Hanna explained that in conducting the smoke testing they paid particularly close attention to the area around the Graham residence. (R. 532-533). The smoke testing, however, did not reveal any problems with the sewer line on the Grahams' property or any lines near their residence. (R. 533-

534). The engineers prepared a report for the Town and made recommendations. (R. 534-535). At trial, Hanna also identified a map that depicted the areas where leaks were found during the study, but he confirmed, as does the map, that no leaks were found at or near the Graham residence. (R. 541, 548, 751).

Hanna testified that there were a number of different options available. When told that the Grahams contended that the sewer line was underneath their house and was leaking sewage, he looked at options to relocate the line. (R. 560-561). He testified that he "drew up a couple of scenarios, but there were no good alternatives there." (R. 561). In addition, he testified that there are different methods that can be used to rehabilitate a sewer line including replacement of the line, the placement of a liner in the existing line, or the use of technology called "pipe bursting." (R. 555). However, based on the testing that was performed, a decision was made to take no remedial action because it was not needed. Hanna specifically testified that he did not find any evidence that there was a problem with the sewer line running across the Grahams' property, and as a result, in his professional opinion there were no repairs or other remedial action that were needed. (R. 555-556).

The evidence thus reflects that the Town did not ignore the Grahams' complaint. The Town engaged Mike Hanna and B.P. Barber to investigate the complaint, perform testing, and make recommendations. Hanna offered his

professional opinions to a reasonable degree of engineering certainty. (R. 584). The actions taken by Hanna and the options he considered were consistent with those discussed by the Grahams' engineering expert, Roger Davis. Although he himself performed no testing, Davis agreed that smoke testing could be done to look for infiltration and leaks in a sewer line. (R. 356-366). He further discussed various options including relocation of the line, replacement of the line, or repair of the line in the event a leak was found. (R. 347, 366-367). As for repairs, he mentioned several options including the use of pressure grouting or slip lining the pipe. (R. 347). Those were the same options considered and deemed not necessary by Mike Hanna.

In sum, the Town presented evidence of several options for relocation, replacement and repair that were considered by the Town engineers, as well as the fourth option which was to take no remedial action. The Town further showed that such options were accepted in the engineering field, and in fact, Roger Davis agreed to the same remedial options. Mike Hanna explained the smoke testing that was performed and the conclusions reached based upon that testing. Davis agreed that the smoke testing was an accepted method for assessing infiltration and leaks in a line. Finally, Hanna explained that no remediation or relocation was deemed necessary based on the results of that testing. Consequently, the Town proved based upon undisputed evidence that discretion was exercised – the Town acting

through its engineers weighed its options and concluded in the exercise of professional judgment that no remedial action was needed.

Those were Judge Lee's rulings as well. Her error – which this Court disregarded – was her decision that discretionary immunity presented a jury question because she confused the breach of duty issue with the immunity issue.

This Court has also erred in denying discretionary immunity based solely on the absence of a camera survey of the line. That error is two-fold. First, there is no evidence that issues of infiltration or exfiltration can only be analyzed by use of a camera survey of the line. The expert testimony from Hanna and Davis, in fact, indicated that smoke testing is an accepted and adequate method to find leaks in a line. Second, there was evidence from Danielle Watson of DHEC, albeit hearsay evidence that was allowed over objection, that a camera test had been attempted on the line near the Grahams' property, but the test was unsuccessful because of some unknown obstruction that did not allow the camera to proceed. Discretionary immunity does not require that the professionals exercising judgment exhaust every possible type of testing before immunity attaches. Such a requirement renders the immunity provision meaningless, and that is certainly not what was required by the General Assembly in including a discretionary immunity provision in the Tort Claims Act nor what was required for common law discretionary immunity as was retained by the Supreme Court in *McCall v. Batson*, 285 S.C.

243, 329 S.E.2d 741 (1995). Importantly, the Supreme Court in *McCall* explained that "discretionary activities cannot be controlled by threat of tort liability by members of the public who take issue with the decisions made by public officials." 329 S.E.2d at 742. The Supreme Court "expressly decline[d] to allow tort liability for these discretionary acts" and specifically acknowledged that "[t]he exercise of discretion includes the right to be wrong." *Id.* This Court has overlooked this history of discretionary immunity and its public policy importance. In essence, according to this Court, discretionary immunity will turn on whether the governmental entity was correct in its exercise of discretion, which renders the immunity meaningless.

Further, this Court has focused on the wrong issue. In denying discretionary immunity, this Court concluded that "[t]he evidence in this case yields the reasonable inference that the Town failed to utilize accepted professional standards in addressing infiltration and inflow problems identified with respect to its sewer line." Slip Op. at 15. Given the partial directed verdict which dismissed claims and issues related to the September 5-6, 2008 events, infiltration was not the issue and was not identified as the problem with the line near the Grahams' property following the significant rain event on those dates. The problem that the Grahams raised was exfiltration, i.e. the seepage of sewage from the line alleged to be under their residence. In a footnote, this Court recognized the difference. Slip Op. at 3.

Moreover, Danielle Watson of DHEC explained the difference and specifically that infiltration is not an issue for a homeowner but rather adds expense for the wastewater operator. (R. 223-224, 235-236). However, in addressing the Town's discretionary immunity defense, this Court focuses only on the infiltration issue and not the exfiltration issue.

Finally, this Court erred in rejecting the precedent established by *Hawkins v. City of Greenville*, 358 S.C. 280, 594 S.E.2d 557 (Ct. App. 2004), in which a different panel of this Court previously affirmed summary judgment for a municipality on causes of action for negligence and trespass arising out of allegations that the municipality failed to properly design and maintain its stormwater drainage system which resulted in flooding of the plaintiff's building. This Court erroneously limited the impact of *Hawkins* to cases involving "measured policy judgments," which is a misreading of *Hawkins*. Slip Op. at 15. *Hawkins* was not a mere challenge to policy determinations, but similar to this case, involved allegations of the impact of multiple flooding events on a particular property and the claim that a municipality failed to take the appropriate remedial action to address the increased water flow through existing drainage pipes. This Court should not disregard *Hawkins* as binding precedent for this case.[1]

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[1] In effect, this Court has overruled or at least dramatically limited the *Hawkins* decision. The Town submits that one panel of this Court should not have the authority to overrule or limit a decision by a prior panel unless there is an intervening decision from this Court sitting *en*

In sum, the Court is respectfully requested to rehear its decision on the Town's discretionary immunity defense and to conclude that the Town is entitled to discretionary immunity for its decision not to perform any remedial work to the sewer line across the Grahams' property.

II. Res Ipsa Loquitur and Proximate Cause

The Court also misapprehended the Town's argument that the Grahams improperly relied on the doctrine of *res ipsa loquitur* as a substitute for proof of any actual defect in the sewer line. Without question, the Grahams' negligence claims are premised on their allegation that a sewer pipe is located beneath their house and has leaked sewage on several occasions since September 6, 2008.[2] The Grahams, however, presented no evidence establishing that the sewer line is cracked or otherwise compromised such that sewage has been discharged from the

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banc or from the South Carolina Supreme Court. While there is no authority in South Carolina addressing whether one panel of this Court may overrule or limit a prior panel, that is an issue that the Fourth Circuit Court of Appeals has addressed and applied on multiple occasions. The Fourth Circuit describes as a "basic principle" the rule that "one panel cannot overrule a decision issued by another panel." *McMellon v. United States*, 387 F.3d 329, 332 (4th Cir. 2004). The Fourth Circuit further explained that "[t]he question of the binding effect of a panel opinion on subsequent panels is of utmost importance to the operation of this court and the development of law in this circuit." *Id.* In effect, the Fourth Circuit has held that one panel cannot overrule a decision issued by another panel "unless the prior opinion has been overruled by an intervening opinion from this court sitting *en banc* or the Supreme Court." 387 F.3d at 333. The same prudential rule should apply in the South Carolina Court of Appeals.

[2] Judge Lee granted a directed verdict for the Grahams' negligence claims arising from the September 5-6, 2008 flooding event. (R. 496). The Grahams have not appealed from that ruling, and it is the law of the case. *See*, *Folkens v. Hunt*, 290 S.C. 194, 348 S.E.2d 839 (Ct. App. 1986); *Eagles v. South Carolina National Bank*, 301 S.C. 402, 392 S.E.2d 187 (Ct. App. 1990).

pipe they allege to be beneath the house. The Grahams, in fact, made no effort to present any such evidence.

This Court acknowledges that the Grahams never proved that the sewer line is beneath their home. Nonetheless, the Court just assumes that the line was "compromised." Slip Op. at 16. There is, however, no evidence of that. And, the snippets of evidence cited by the Court in its opinion do not prove that either. The Court again errs in citing to evidence of an infiltration problem with the Town's system. As discussed above, infiltration is not the issue. The Grahams' claims are based on exfiltration, i.e., the alleged leakage of sewage from the pipe. Moreover, any testimony of infiltration issues generally in the Town's system as a whole, as provided by Danielle Watson of DHEC, does not provide evidence of any leaks or breaches or "compromise" in the pipe *at the actual location of the Grahams' property*. In fact, the smoke tests showed no problems with the line in the immediate vicinity of the Grahams' property, and that is undisputed. Likewise, a "bubbling" manhole is not evidence of a breach in the line, nor is some unidentified obstruction in the line per the hearsay testimony elicited from Watson regarding the camera test with which she was uninvolved and had no personal knowledge. Finally, "the Town's inability to precisely locate its own sewer line," Slip Op. at 16, which is not a fair description of the evidence, would nonetheless not be evidence that the line was breached in some respect.

With all due respect, the Court's analysis of this issue makes the Town's point. The Court could point to no evidence that the line was cracked or otherwise compromised beneath the Grahams' home.[3] The Court could only point to generalized evidence that failed to prove or even infer that critical fact. Consequently, it is clear that the Grahams relied on the doctrine of *res ipsa loquitur* as a substitute for proof of any actual defect in the sewer line at or near their property.

III. Damages to Real Property

On the issue of Mrs. Graham's claim for damages to real property, the Court has overlooked and not addressed the actual issues raised by the Town. The Town fully acknowledges that Judge Lee charged the appropriate measure of damages for both temporary and permanent damage to real property. The charge was not the issue. Instead, Judge Lee erred in allowing the Grahams to present evidence of a *different measure of damages than what she charged.* Specifically, she allowed the jury to consider the monetary figure of $478,280 as the cost to *rebuild* the exact same house at a different location. That figure represents neither the diminution of fair market value before and after the injury nor the cost of *repair.* John Benton offered no opinions regarding the repair of the existing house, the scope of any such repair, or the costs of such repairs. Instead, at best, his estimate can be

[3] The Grahams had the same problem in their brief.

characterized as a replacement value, which is not the appropriate measure of damages under Judge Lee's charge or applicable case law.[4]

Although this Court does not use the term, it appears that the Court found this to be mere "harmless error" given the Court's emphasis that "the jury returned a verdict of less than half this figure -- $225,000 – for Mrs. Graham." Slip Op. at 18. In other words, because the jury returned a lesser amount than the inadmissible damages evidence, there was somehow no harm caused by allowing evidence of the wrong measure of damages. Of course, there is no evidence of the correct measure of damages either. The record does not include evidence of the fair market value of the home before and after the injury nor the cost of repair. Certainly, the Court has not pointed to any such evidence in its opinion, just as the Grahams were unable to point to any such evidence in their brief. With all due respect, the Court has a duty to set aside and not sustain a verdict that is unsupported by the evidence presented. The amount of damages cannot be left to pure speculation or, as in this case, evidence of the wrong measure of damages.

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[4] In his concurrence, Judge Cureton concludes that Benton's testimony was relevant because the properly measure of damages is the "cost of repair or restoration." Slip Op. at 23. However, Benton's estimate was not for the cost of repair or restoration; it was a replacement cost estimate, i.e., building the house in new condition in another site. That is not the measure of damages allowed by law or by the unchallenged charge given by Judge Lee in this case. Moreover, while Judge Cureton is construing "restoration" as being synonymous with "replacement," it is worth mentioning that Judge Lee did not charge "restoration" as the measure of damages, meaning it is not applicable to this case at any rate.

The Court is therefore asked on rehearing to decide the issues actually presented and to find that Vickie Graham failed to present evidence to support her damages claim as well as the $225,000 verdict. The Town was entitled to judgment as a matter of law based on (1) Mrs. Graham's failure to present proof that the real property was permanently injured and could not be repaired and (2) her failure to present proof of the diminution of the fair market value of the property. Similarly, Mrs. Graham failed to present evidence that the property could be repaired and what the reasonable repair costs would be. Thus, the Town was entitled to judgment as a matter of law on these damages issues or, at the very least, a new trial absolute.[5]

IV. Damages to Personal Property

The Court has similarly overlooked and not addressed the actual issues raised with respect to Claude Graham's claim for loss of personal property.

Specifically, the Town argued that Mr. Graham testified to the loss of hand tools, golf equipment, two lawnmowers, and other equipment that were located in a storage room on the property. (R. 120-121). Yet, he never testified that those items of personal property were damaged subsequent to the flooding of the yard that occurred on September 5-6, 2008. Moreover, he never offered testimony that

[5] The new trial must include both issues of liability and damages. *See*, S.C. Code Ann. § 15-33-125. The Grahams did not move for nor were they entitled to a directed verdict on liability.

those items were undamaged in the September 5-6, 2008 event. That is critical because Judge Lee granted a directed verdict on the Grahams' negligence claims related to the events of September 5-6, 2008. That ruling was unappealed and is now the law of the case. Therefore, the Town cannot be liable for any damages to real or personal property occurring on those dates. By failing to present evidence as to when the property located in the storage room was damaged, Mr. Graham did not sustain his burden of proof. It is just as likely (if not more so) that that property, like the vehicles, was damaged during the September 5-6, 2008 event. The Court on rehearing is respectfully asked to address this issue of proof, which was clearly raised and has not been addressed in this Court's opinion.

The Town also argued that a new trial absolute is warranted because Judge Lee never instructed the jury that it could not consider any damages occurring on September 5-6, 2008, because she had directed a verdict on all claims, including the negligence claims, related to those dates. In her post-trial order, Judge Lee explains that "[t]he Court provided an instruction to the jury on the September 5-6 events as it deemed appropriate." (R. 17). But, Judge Lee does not specifically point to any such "appropriate" instruction in the record nor could she – because there is none. After the court directed the verdict, her explanation of her rulings at directed verdict made no mention that the events of September 5-6, 2008 were no

longer at issue. (R. 499). This issue, however, has not been addressed by this Court.

CONCLUSION

Based on the foregoing discussion, the Appellant-Respondent respectfully requests that the Court rehear its decision in this case. The Appellant-Respondent renews its request that this Court reverse the orders of Circuit Court Judge Alison Renee Lee denying the Town's motion for JNOV and motions for directed verdict on the negligence cause of action. In the alternative, the Town of Latta requests that the Court remand for a new trial absolute on the negligence claims.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Appellant-Respondent Town of Latta, does hereby certify that service of **Petition for Rehearing** and **Memorandum in Support of Petition for Rehearing** was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 14th day of April 2016:

Reynolds Williams, Esquire
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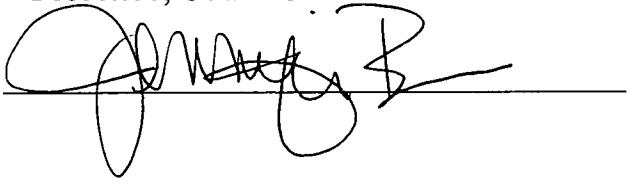
Florence, South Carolina 29503-1909



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April 14, 2016

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Hand Delivered
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
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RE: Claude W. Graham v. Town of Latta, South Carolina
Vickie B. Graham v. Town of Latta, South Carolina
Appellate Case Number: 2013-000752
Civil Action Numbers: 2008-CP-17-0376 and 2008-CP-17-0377
Claim Number: 690001C05341
Our File Number: 321.7974

Dear Ms. Kitchings:

Please find enclosed for filing the originals and seven copies each of the **Petition for Rehearing** and **Memorandum in Support of Petition for Rehearing** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me by way of my courier. I have also enclosed my firm's $25.00 check for the filing fee.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

cc: (w/ Enclosures)

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