

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Appellate Case No.: 2017-001083
Case No. 2015-CP-40-07181

RECEIVED
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SC Court of Appeals

Ex parte: The Travelers Home and Marine Insurance Company Appellant,

In Re: William Gresham as Personal Representative of the Estate
of John Corey Stringfellow, Respondent,

v.

Cameron Thomas Stringfellow, Defendant.

SUPPLEMENTAL RECORD ON APPEAL

James M. Griffin, Esquire
Margaret N. Fox, Esquire
Griffin Davis LLC
1116 Blanding Street
Columbia, South Carolina 29201
Phone: (803) 774-0800
jgriffin@griffindavislaw.com
mfox@griffindavislaw.com
Attorneys for Respondent

William P. Davis, Esquire
Susan D. DuBose, Esquire
Baker, Ravenel & Bender, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone: (803) 799-9091
wdavis@brblegal.com
sdubose@brblegal.com

and

Carrie H. O'Brien
Wilson, Jones, Carter & Baxley, P.A.
6701 Carmel Road, Suite 475
Charlotte, North Carolina 28226
Phone: (704) 247-9679
chobrien@wjlaw.net
Attorneys for Appellant

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STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

William Gresham as Personal Representative of the Estate of John Corey Stringfellow

Plaintiff(s)

vs.

Cameron Thomas Stringfellow

Defendant(s)

Submitted By: James M. Griffin

Address: 1116 Blanding Street, First Floor (29201) P.O. Box 999 Columbia, SC 29202

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2015CP4007181

SC Bar #: 9995 Telephone #: 803-744-0800 Fax #: 803-744-0805 Other: E-mail: jgriffin@griffindavislaw.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint. NON-JURY TRIAL demanded in complaint. This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules. This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules. This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- Contracts: Constructions (100), Debt Collection (110), General (130), Breach of Contract (140), Fraud/Bad Faith (150), Failure to Deliver/Warranty (160), Employment Discrim (170), Employment (180), Other (199)
Torts - Professional Malpractice: Dental Malpractice (200), Legal Malpractice (210), Medical Malpractice (220), Previous Notice of Intent Case # 20 -NI-, Notice/ File Med Mal (230), Other (299)
Torts - Personal Injury: Conversion (310), Motor Vehicle Accident (320), Premises Liability (330), Products Liability (340), Personal Injury (350), Wrongful Death (360), Assault/Battery (370), Slander/Label (380), Other (399)
Real Property: Claim & Delivery (400), Condemnation (410), Foreclosure (420), Mechanic's Lien (430), Partition (440), Possession (450), Building Code Violation (460), Other (499)
Inmate Petitions: PCR (500), Mandamus (520), Habeas Corpus (530), Other (599)
Administrative Law/Relief: Reinstate Drv. License (800), Judicial Review (810), Relief (820), Permanent Injunction (830), Forfeiture-Petition (840), Forfeiture-Consent Order (850), Other (899)
Judgments/Settlements: Death Settlement (700), Foreign Judgment (710), Magistrate's Judgment (720), Minor Settlement (730), Transcript Judgment (740), Lis Pendens (750), Transfer of Structured Settlement Payment Rights Application (760), Confession of Judgment (770), Pardon for Workers Compensation Settlement Approval (780), Other (799)
Appeals: Arbitration (900), Magistrate-Civil (910), Magistrate-Criminal (920), Municipal (930), Probate Court (940), SCDOT (950), Worker's Comp (960), Zoning Board (970), Public Service Comm. (990), Employment Security Comm (991), Other (999)
Special/Complex /Other: Environmental (600), Automobile Arb. (610), Medical (620), Other (699), Sexual Predator (510), Pharmaceuticals (630), Unfair Trade Practices (640), Out-of State Depositions (650), Motion to Quash Subpoena in an Out-of-County Action (660), Pre-Suit Discovery (670)

FILED IN RICHLAND COUNTY SOUTH CAROLINA DECEMBER 1 2015 3:33 PM JENNIFER A. MOBRIDGE C.C.P. CLERK

Submitting Party Signature: [Signature]

Date: December 1, 2015

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRPC, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

FOUR MANDATED ADR COUNTIES ONLY

Aiken, Allendale, Anderson, Bamberg, Barnwell, Beaufort, Berkeley, Calhoun, Charleston, Cherokee, Clarendon, Colleton, Darlington, Dorchester, Florence, Georgetown, Greenville, Hampton, Horry, Jasper, Kershaw, Lee, Lexington, Marion, Oconee, Orangeburg, Pickens, Richland, Spartanburg, Sumter, Union, Williamsburg, and York

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

You are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs. (Medical malpractice mediation is mandatory statewide.)
4. Cases are exempt from ADR only upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

Please Note: You must comply with the Supreme Court Rules regarding ADR. Failure to do so may affect your case or may result in sanctions.

STATE OF SOUTH CAROLINA,)
)
COUNTY OF RICHLAND)
)
William Gresham as Personal)
Representative of the Estate of John Corey)
Stringfellow)

IN THE COURT OF COMMON PLEAS

SUMMONS

Plaintiff,)

vs.)

FILE NO.

SURVIVAL ACTION

Cameron Thomas Stringfellow)
)
Defendant.)

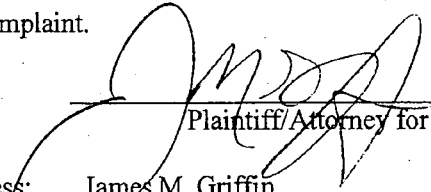
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JEANNETTE W. MCBRIDE
C.C.P. & G.S.

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Columbia, South Carolina

Dated: December 1, 2015



Plaintiff/Attorney for Plaintiff

Address: James M. Griffin
GRIFFIN DAVIS, LLC
P.O. Box 999
Columbia, SC 29202

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS

William Gresham as Personal)
Representative of the Estate of)
John Corey Stringfellow,)

COMPLAINT
(WRONGFUL DEATH)

Plaintiff,)

v.)

Cameron Thomas Stringfellow,)

Defendant.)

RICHLAND COUNTY
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JEANNETTE W. HODRIDGE
C.C.P. & G.S.

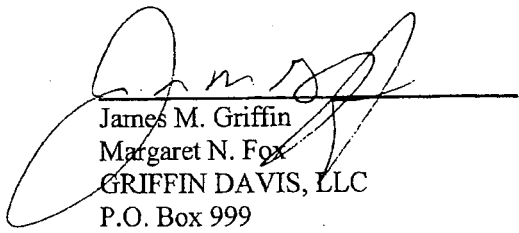
The Plaintiff, above-named, complaining of the Defendant, above-named, alleges as follows:

1. Plaintiff is the duly appointed personal representative of the Estate of John Corey Stringfellow, ("the Estate"), having been appointed by the Richland County Probate Court on April 28, 2015.
2. Plaintiff brings this action pursuant to the provisions of the South Carolina Wrongful Death Statute, S.C. Code §15-51-10.
3. Defendant Cameron Thomas Stringfellow is a citizen and resident of Richland County, South Carolina.
4. The parties and the subject matter of this action are within the jurisdiction of this Court.
5. On or about May 24, 2013, Plaintiff's decedent John Corey Stringfellow was a 16-year-old minor riding as a passenger in an automobile driven by the Defendant.

6. Defendant was driving an automobile on Shallow Brook Drive, in the Wildewood neighborhood in Richland County, lost control of his vehicle, hit a parked vehicle and then collided with a tree.
7. At the time of the collision, Defendant was under the influence of alcohol and drugs to the degree that Defendant's judgment was impaired. As a result, the South Carolina statutory cap on non-economic damages and punitive damages does not apply.
8. Defendant was also driving in excess of 90 miles an hour at the time of the collision.
9. The speed limit on Shallow Brook Drive is 25 miles per hour.
10. As a result of the collision, Plaintiff's decedent sustained fatal injuries to his head, neck and torso and subsequently died.
11. Defendant was arrested and criminally charged with felony DUI.
12. Defendant had a blood alcohol content of .186 in his blood stream at the time Defendant's blood was drawn shortly after the collision.
13. The airbag control module in the vehicle driven by the Defendant recorded an impact speed of 94.4 m.p.h.
14. On February 26, 2015, Defendant pled guilty to Involuntary Manslaughter and Driving Under the Influence in the Richland County Court of General Sessions.
15. Defendant was negligent, grossly negligent and reckless in the operation of the motor vehicle in one or more of the following particulars:
 - i. Driving too fast for conditions;

- ii. Failing to keep a proper lookout;
 - iii. Failing to keep control of his vehicle;
 - iv. Driving under the influence of alcohol and unlawful drugs to the degree that the Defendant's judgment was impaired; and
 - v. Speeding.
16. As a proximate result of Defendant's negligent, reckless and grossly negligent conduct, Plaintiff's decedent died from the injuries he sustained in the collision.
17. Defendant is therefore liable to the Estate for actual damages including but not limited to the past, present and future mental shock and suffering, grief and sorrow endured and to be endured in the future by decedent's parents, Tommy and Patti Stringfellow, who are the decedent's statutory beneficiaries, and the past, present and future loss of companionship and comfort of the decedent's society in an amount to be determined.
18. Defendant is liable to the Estate for punitive damages in an amount to be determined.
19. Defendant is also liable to the Estate for funeral expenses.

WHEREFORE, the Plaintiff prays for judgment against the Defendant by way of damages as alleged above; for actual and punitive damages in an amount to be determined; for the costs and disbursements of this action; and for such other and further relief as the Court may deem just and proper.



James M. Griffin
Margaret N. Fox
GRIFFIN DAVIS, LLC
P.O. Box 999
Columbia, SC 29202
Tel. 803.744.8000
Fax 803.744.0805
jgriffin@griffindavislaw.com

David W. Farrell
2229 Bull Street
Columbia, S.C. 29201
Tel. (803) 256-7011
dwf-law@earthlink.com

December 1, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

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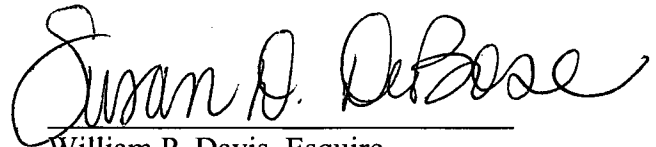
In Re: William Gresham as Personal Representative of the Estate
of John Corey Stringfellow, Respondent,

v.

Cameron Thomas Stringfellow,Defendant.

CERTIFICATE OF COUNSEL

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



William P. Davis, Esquire
Susan D. DuBose, Esquire
Baker, Ravenel & Bender, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone:(803) 799-9091
wdavis@brblegal.com
sdubose@brblegal.com
Attorneys for Appellant

and

Carrie H. O'Brien
Wilson, Jones, Carter & Baxley, P.A.
6701 Carmel Road, Suite 475
Charlotte, North Carolina 28226
Phone: (704) 247-9679
chobrien@wjlaw.net
Attorneys for Appellant

March 6, 2018