

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

**RECEIVED**

APR 21 2020

APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

Honorable R. Keith Kelly, Circuit Court Judge

Case No. 2014-CP-04-1426 *consolidated with* Case No. 2015-CP-04-2206

---

Appellate Case No. 2020-000523

---

Carla Denise Garrison and Clint Garrison.....Petitioners/Respondents,

v.

Target Corporation.....Respondent/Petitioner.

---

**Proof of Service**

---

I, Joshua T. Hawkins, certify that I filed this Petitioners/Respondents' Return to Respondent/Petitioner's Petition for Writ of Certiorari to the Clerk of the Supreme Court and sent a copy to the following by certified mail:

Mr. Knox L. Haynsworth, III  
Brown, Massey, LLC  
106 Williams Street  
Greenville, South Carolina 29601  
**ATTORNEY FOR RESPONDENT/PETITIONER TARGET CORP.**

Messrs. Powell, Sibley, and Elliker  
Hunton and Williams, LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
**ATTORNEYS FOR RESPONDENT/PETITIONER TARGET CORP.**

John C. Moylan  
Henry L. Parr  
Wallace K. Lightsey  
WYCHE, P.A.  
807 Gervais St., Suite 301  
Columbia, SC 29201  
**ATTORNEYS FOR RESPONDENT/CROSS APPELLANT**

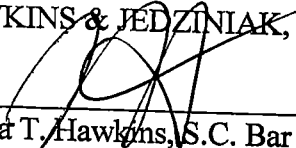
Wm. Grayson Lambert  
BURR & FORMAN LLP  
Post Office Box 11390  
Columbia, SC 29211  
(803) 799-9800  
**COUNSEL FOR AMICI CURIAE**

The Honorable Alan Wilson  
P.O. Box 11549  
Columbia, S.C. 29211  
Rembert Dennis Building  
1000 Assembly Street, Room 519  
Columbia, S.C. 29201  
**SOUTH CAROLINA ATTORNEY GENERAL**

- SIGNATURE PAGE TO FOLLOW -

Respectfully submitted,

HAWKINS & JEDZINIAK, LLC

  
\_\_\_\_\_  
Joshua T. Hawkins, S.C. Bar #78470

Helena L. Jedziniak, S.C. Bar #100825

1225 South Church Street

Greenville, South Carolina 29605

(864) 275-8142 (telephone)

(864) 752-0911 (facsimile)

josh@hjlhc.com

helena@hjlhcsc.com

Attorneys for Plaintiff

Greenville, South Carolina  
APRIL 16, 2020