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June 18, 2014
 Via Regular-Mail Hand Delivery

2014 JUN 19 AM 10:09
 PATRICIA C. GRANT
 COLLETON COUNTY CLERK
 COMPTON PLACE

The Honorable Patricia Grant
 Colleton County Clerk of Court
 P.O. Box 620
 Walterboro, SC 29488

Re: DO and RO, Individually and as Parents and Guardians of BO, a Minor vs. Sally
 Atwater and Colleton County School District
 Civil Action No.: 14-CP-15-_____

Dear Madam Clerk:

Enclosed please find the original and one copy each of a Civil Action Coversheet, Summons, and Complaint, together with a check for \$150.00 for filing, in regards to the above referenced case.

I would appreciate it if you would file the original and return the time-stamped copy to me in the return envelope provided.

I thank you in advance for your assistance in this matter. Please do not hesitate to contact me with any questions or concerns you may have in this regard.

By courtesy copy of this correspondence, I am providing counsel for Plaintiff a copy of same.

With kindest regards, I am

Sincerely yours,

J. Olin McDougall, II, Esquire
 Davis A. Whitfield-Cargile, Esquire

JOM/mh
 Enclosure

DO and RO, Individually and as Parents and Guardians of BO, a Minor,

Plaintiff(s)

vs.

SALLY ATWATER and COLLETON COUNTY SCHOOL DISTRICT,

Defendant(s)

CIVIL ACTION COVERSHEET

2014-CP - 15- 500

Submitted By: J. Olin McDougall, II
Davis Whitfield-Cargile
McDougall LawFirm, LLC
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Telephone #: 843-379-7000
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Other:
E-mail: davis@mflaw.co

2014 JUN 19 10:08
PATRICIA A.
COLLETON COUNTY
CLERK OF COURT

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), Employment (120), General (130), Breach of Contract (140), Other (199)
Torts - Professional Malpractice: Dental Malpractice (200), Legal Malpractice (210), Medical Malpractice (220), Previous Notice of Intent Case # 20-CP-..., Notice/ File Med Mal (230), Other (299)
Torts - Personal Injury: Assault/Slander/Libel (300), Conversion (310), Motor Vehicle Accident (320), Premises Liability (330), Products Liability (340), Personal Injury (350), Wrongful Death (360), 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), Petition 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), Pharmaceuticals (630), Unfair Trade Practices (640), Out-of State Depositions (650), Motion to Quash Subpoena in an Out-of-County Action (660), Sexual Predator (510)

Submitting Party Signature:

[Handwritten Signature]

Date: June 18, 2014

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

FOR MANDATED ADR COUNTIES ONLY

Allendale, Anderson, Beaufort, Clarendon, Colleton, Florence, Greenville, Hampton, Horry, Jasper, Lee, Lexington, Pickens (Family Court Only), Richland, 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 COLLETON)
)
DO and RO,)
Individually and as Parents and)
Guardians of BO,)
a Minor,)
)
PLAINTIFFS,)
)
v.)
)
SALLY ATWATER and)
COLLETON COUNTY SCHOOL)
DISTRICT,)
)
DEFENDANTS.)

IN THE COURT OF COMMON PLEAS
FOR THE FOURTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO.: 2014-CP-15-_____

2014 JUN 19 AM 10:09
EXTENSION OF GRANT
COLLETON COUNTY
COMMON PLEAS

SUMMONS
(JURY TRIAL DEMANDED)

TO: DEFENDANTS NAMED ABOVE:

YOU WILL PLEASE TAKE NOTICE that you are Summoned and required to answer the Complaint filed in this matter, and serve a copy of your Answer to the subscriber at his office at Post Office Box 1336, Beaufort, South Carolina 29901-1336, within thirty (30) days from the date of the service hereof, exclusive of the date of such service; and, if you fail to answer such Complaint within the time aforesaid, the Plaintiff will seek a judgment by default against you for the relief demanded in the Complaint.

McDOUGALL LAW FIRM



J. Olin McDougall, II, Esquire
Davis A. Whitfield-Cargile, Esquire
Post Office Box 1336
Beaufort, South Carolina 29901-1336
(843) 379-7000
Attorneys for Plaintiffs

Beaufort, South Carolina
June 18, 2014

STATE OF SOUTH CAROLINA)
)
 COUNTY OF COLLETON)
)
 DO and RO Individually and)
 as Parents and Guardians of BO,)
 a Minor,)
)
 PLAINTIFFS,)
)
 v.)
)
 SALLY ATWATER and)
 COLLETON COUNTY SCHOOL)
 DISTRICT,)
)
 DEFENDANTS.)

IN THE COURT OF COMMON PLEAS
 FOR THE FOURTEENTH JUDICIAL CIRCUIT
 CIVIL ACTION NO.: 2014-CP-15-_____

2014 JUN 19 AM 10:09
 CLERK OF COURT
 COLLETON COUNTY
 COMMON PLEAS

COMPLAINT
(JURY TRIAL DEMAND)

Plaintiffs, DO and RO, Individually and as Parents and Guardians of BO, a Minor, by and through their undersigned attorneys, and complaining of the Defendants above-named, would allege and show unto the Court the following:

1. Plaintiffs DO and RO are citizens of the State of South Carolina and residents of Colleton County. DO and RO are lawfully married and are the biological parents and legal guardians of BO, a minor.
2. BO is a student enrolled in the Colleton County School District at Hendersonville Elementary School. At all times complained of in this complaint BO was a student in the classroom of Sally Atwater. BO is a minor. BO is and was at all times complained of herein a special needs student.
3. Plaintiffs are referred to in this public filing by pseudonym to maintain confidentiality of their identity due to the nature of the allegations contained herein, and to

protect the identity of a victim of assault, and to protect the identity of a minor special needs student.

4. Defendants will be informed of the identity of the Plaintiffs by separate communication upon their agreement to maintain confidentiality of the information as to the public record.

5. Defendant Sally Atwater is a citizen of South Carolina and a resident of either Colleton, Charleston or Richland Counties. At all times complained of herein, Atwater was employed as a teacher at Hendersonville Elementary in Hendersonville, South Carolina.

6. Upon information and belief, Defendant Colleton County School District ("CCSD") is a public school system. Furthermore, CCSD operates Hendersonville Elementary School located in Hendersonville, South Carolina. CCSD is responsible for hiring, training, supervising and retaining the teachers, staff and administrators at Hendersonville Elementary School.

7. The Court has personal jurisdiction over the parties hereto and subject matter jurisdiction over the causes of action set forth herein.

8. Venue is proper in Colleton County.

FACTUAL ALLEGATIONS

9. BO has been a student at Hendersonville Elementary since approximately the 2009 – 2010 school year. BO is a special needs student. During the 2013 – 2014 school year, BO was assigned to the classroom of Sally Atwater.

10. During the course of the school year, Atwater has made malicious and demeaning comments to BO and about BO while speaking to others, including to DO and RO, upon information and belief, to school administrators and to school teachers.

- a. On one occasion, October 2013, when the students were coming back from lunch, Defendant Atwater stopped the students in the hallway and yelled at the special needs students, including BO, that the special needs students, including BO were all either going to be thugs, gang member, or end up in jail, evincing a malicious attitude toward BO and other special needs students. This was done in the presence of school administrators, and others.
- b. On a separate occasion in September 2013 after BO had suffered a broken ankle, in the presence of others, Defendant Atwater castigated BO, RO and WO, and his physical therapist, and made other demeaning and malicious comments attitude toward BO.
- c. Upon information and belief, there were other incidents where Defendant Atwater evinced a malicious attitude towards BO.

11. On December 19, 2013, Sally Atwater hung a piñata in her classroom. The piñata was filled with candy. Atwater instructed the students to beat the piñata until the candy came out.

12. Just before the candy came out, Atwater yelled out that the students were not to go after the candy.

13. Atwater knew or should have known that children would be naturally inclined to retrieve the candy when it fell on the floor.

14. Like the other students in the classroom, BO tried to retrieve candy from the floor when the piñata was busted open and the candy came out on the floor.

15. With actual malice and intent to harm, and with a crazed, angry look on her face, Atwater charged at and assaulted and physically shoved BO away from the candy from the piñata, touching him offensively and in an unwanted manner.

16. Upon information and belief, Atwater did this act with actual malice and intent to harm.

17. Defendant Atwater's actions on December 19, 2013 when she charged at and shoved BO served no legitimate educational purpose and can only be described as malicious and harmful acts directed at BO.

18. Plaintiff BO witnessed and apprehended Atwater's crazed and angry assault, and was caused to be terrified.

19. Plaintiff was touched in an unwanted and offensive manner, objectively and subjectively.

20. Atwater held herself out as having received appropriate training to teach special needs students, but none of her conduct was consistent with that purported training.

21. CCSD knew or should have known of Atwater's general malicious attitude toward BO in particular and special needs children in general.

22. While Atwater was acting within the scope of her position as a teacher at CCSD when she assaulted BO, she was acting with actual malice and intent to harm towards BO when she vicariously and maliciously assaulted BO on December 19, 2013.

23. As a result of the injuries sustained as a result of Atwater's assault and battery on BO on December 19, 2013, DO and RO have incurred economic loss and injury.

24. BO's 504 plan and IEP require that CCSD provide a BO shadow at all times during the school day when BO is at school.

25. BO's school day ends at 1:30.

26. For the majority of the 2013-2014 school year, CCSD has failed to provide a shadow after 1:15 p.m.

27. Between 1:15 and 1:30 p.m. on January 8, 2014, Defendant Atwater's classroom was staffed with Defendant Atwater, a teacher assistant named Pearlle Simpson ("Simpson") and a teacher's aide named Mrs. Martin.

28. Between 1:15 and 1:30 p.m. on January 8, 2014, DO came into the classroom to pick up his son, BO.

29. Between 1:15 and 1:30 p.m. on January 8, 2014, BO was inappropriately touched in an offensive and unwanted manner by Mrs. Simpson, the teacher's assistant in Defendant Atwater's classroom. As BO got up to greet his father at the end of BO's school day, Mrs. Simpson grabbed BO aggressively by his arm and forcefully pushed him back towards his seat, causing injury to BO. Mrs. Simpson grabbed BO with such force that it caused bruising and red marks to remain upon BO's skin for some time.

30. CCSD was on notice that Mrs. Simpson had a propensity to inappropriately and with excessive force touch and grab students. In December 2013, a relative of a pupil notified CCSD and Hendersonville Elementary School administrators that she had witnessed Mrs. Simpson grabbing another student in a forceful and inappropriate manner.

31. Simpson received no or inadequate training for supervising and working with special needs students.

32. Simpson received no or inadequate training on the propriety of touching students, and/or on the appropriate use of seclusion or restraint or other methods of dealing with students, including CPI training.

33. Defendants Atwater and CCSD knew that Simpson had no training for dealing with special needs students, but nonetheless allowed Mrs. Simpson to be in a position of supervision over special needs students in Defendant Atwater's classroom.

34. Defendants Atwater and CCSD knew that Simpson had no training in the use of seclusion or physical restraint, but allowed Simpson to be in a position of supervision over special needs students in Defendant Atwater's classroom, notwithstanding Simpson's lack of training and Simpson's past history of inappropriately touching students.

35. Consistent with her actual malice towards BO, Defendant Atwater ratified the Simpson's inappropriate and harmful touching by writing a letter in which Defendant Atwater claims ignorance of the incident on the one hand, and then casts any blame for the incident upon the special needs student who she allowed to be supervised by an untrained teacher's assistant with a known history of grabbing students in a forceful and inappropriate manner.

36. Consistent with her actual malice towards BO, Defendant Atwater ratified Simpson's inappropriate and harmful touching by writing a letter supporting Mrs. Simpson, even after Mrs. Simpson had submitted her own written statement which was full of false statements directly inconsistent with Defendant's Atwater's version of events.

37. Consistent with her actual malice towards BO, Defendant Atwater ratified Mrs. Simpson's inappropriate and harmful touching by allowing Mrs. Simpson back into her classroom after the December 2013 report of Mrs. Simpson's forcefully touching another student, and after Mrs. Simpson's inappropriate and harmful touching of RO on January 8, 2014.

38. Mrs. Martin confirmed in writing that Mrs. Simpson grabbed BO with excessive force which was inconsistent with CPI training and which Mrs. Martin confirmed was unnecessary.

39. BO required extensive medical treatment as a result of the injuries he sustained at Hendersonville Elementary School in Defendant Atwater's classroom.

AS A FIRST CAUSE OF ACTION
(Assault as to Atwater)

40. All allegations above are incorporated and repeated herein verbatim.

41. Atwater, while acting with actual malice and intent to harm, assaulted and battered BO on December 19, 2013.

42. Atwater acted in a manner in which she intended, objectively and subjectively, that BO would apprehend an offensive and unwanted touching.

43. BO, objectively and subjectively, apprehended Atwater coming at him with force in an unwanted and offensive manner.

44. As a result of Atwater's assault, BO suffered injury and damages and required extensive medical treatment. BO requests a jury trial to determine the full extent of his damages and an award of actual and punitive damages against Atwater.

AS A SECOND CAUSE OF ACTION
(Battery as to Atwater)

45. All allegations above are incorporated and repeated herein verbatim.

46. Atwater, while acting with actual malice and intent to harm, assaulted and battered BO on December 19, 2013.

47. Atwater acted in a manner in which she intended, objectively and subjectively, that BO would apprehend an offensive and unwanted touching.

48. BO, objectively and subjectively, apprehended Atwater coming at him with force in an unwanted and offensive manner.

49. BO was touched in an unwanted and offensive manner by Atwater.

50. As a result of Atwater's battery, BO suffered injury and damages and required extensive medical treatment. BO requests a jury trial to determine the full extent of his damages and an award of actual and punitive damages against Atwater.

AS A THIRD CAUSE OF ACTION

(Gross Negligence and Negligent Supervision and Retention as to CCSD and Atwater)

51. All allegations above are incorporated and repeated herein verbatim.

52. Defendant CCSD represented to Plaintiffs and other employees, faculty and staff that Hendersonville Elementary School provided a safe, healthy and secure environment for volunteers, employees, faculty, and staff. Through this representation, Defendant CCSD assumed a duty to ensure that such an environment was provided to Plaintiffs' under its own policies and procedures.

53. Defendant CCSD and Atwater acted grossly negligent, maliciously, willfully and wantonly, and breached this duty to Plaintiffs by:

- (a) Failing to properly train and/or supervise its employees, faculty and staff so as to insure that BO was provided with adequate care and protection from assault and battery by Atwater;
- (b) Failing to properly train and/or supervise its employees, faculty and staff so as to insure that BO was provided with adequate care and protection from assault and battery by Simpson;
- (c) Failing to implement the existing policies and procedures governing touching of students within CCSD to ensure that BO was free from inappropriate touching and assault and battery by Atwater;
- (d) Failing to implement the existing policies and procedures governing touching of students within CCSD to ensure that BO was free from inappropriate touching by Simpson;

- (e) Failing to properly supervise or train Atwater, an employee Defendant CCSD knew or should have known possessed a proclivity to act with malice towards students, and to assault and batter students;
- (f) Failing to properly supervise or train Simpson, an employee Defendant CCSD and Atwater knew or should have known possessed a proclivity to act with malice towards students, and to inappropriately touch students
- (g) Failing to have in place proper safeguards to protect BO from Atwater's inappropriate touching;
- (h) Representing that its teachers were dependable and trustworthy and that they were adequately equipped to teach and educate special needs students;
- (i) Concealing or ignoring Atwater's maliciousness towards students in general, and maliciousness and ill-will towards special needs in particular, and inappropriate assault and battery of students;
- (j) Facilitating and/or creating an environment which subjected BO to harassment and inappropriate touching by Atwater;
- (k) Facilitating and/or creating an environment which subjected BO to harassment and inappropriate touching by Simpson;
- (l) Acting with actual malice and intent to harm towards BO;
- (m) Allowing Mrs. Simpson to remain in the classroom after Atwater and CCSD were on notice of an incident in December in which Simpson inappropriately and forcefully grabbed another student;
- (n) By any other particulars which may be shown at trial.

54. Decisions made by Defendant CCSD to ignore Atwater' and Simpson's violations of its own policies and to not report their behavior to proper authorities were actions taken by CCSD's agents and employees acting within the scope of their official duty.

55. Defendant CCSD's failure to properly educate, inform and enforce its own policies and procedures on physical touching of students to employees, faculty and staff was the proximate cause of Plaintiffs' injuries.

56. By reason of the foregoing, Plaintiffs are entitled to recover damages for all general and special damages proximately caused by Defendant CCSD's grossly negligent, willful, wanton, reckless, and careless acts and omissions, including punitive damages.

57. In operating a public school system, Defendant CCSD undertook the duty to exercise reasonable care in supervision and retaining employees, faculty and staff entrusted with ensuring the safety and care of children and other employees, faculty and staff under its own policies and procedure regarding assault and battery.

58. Defendant CCSD owed the Plaintiffs a duty of care to exercise its right and ability to monitor, supervise or otherwise control the conduct of employees, faculty and staff to prevent the type of conduct outlined in its policies against assault and battery.

59. By reason of the foregoing, Plaintiffs are entitled to recover damages for all general and special damages proximately caused by Defendant CCSD's grossly negligent, willful, wanton, reckless, and careless acts and omissions, including punitive damages.

AS A FOURTH CAUSE OF ACTION

(Outrage as to Atwater)

60. All allegations above are incorporated and repeated herein verbatim.

61. Defendant Atwater intentionally inflicted severe emotional distress on Plaintiffs and was substantially certain that such distress would result from her conduct when she

deliberately, intentionally, and maliciously assaulted BO for going after candy that came from a Piñata she hung from the ceiling.

62. Defendant Atwater's conduct as so extreme and outrageous as to exceed all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized community where the safety and professionalism of educators is essential to public education in the community.

63. The actions of Defendant Atwater complained of herein caused Plaintiffs to suffer severe emotional distress including but not limited to persistent stress, trauma, outrage, shock, embarrassment, anxiety, and extreme nervousness.

64. By reason of the foregoing, Plaintiffs are entitled to recover damages for all general and special damages proximately caused by Defendant Atwater's outrageous conduct as embodied in the tort of outrage, including punitive damages.

AS A FIFTH CAUSE OF ACTION
(Outrage as to CCSD)

65. All allegations above are incorporated and repeated herein verbatim.

66. CCSD recklessly inflicted severe emotional distress on Plaintiffs when it failed to observe, adhere to, or enforce its own policies and procedures on assault and battery by its teacher, and when it allowed Defendant Atwater to engage in assault and battery on a student.

67. Defendant CCSD's conduct as so extreme and outrageous as to exceed all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized community where the safety and professionalism of educators is essential to public education in the community.

68. The actions of Defendant CCSD complained of herein caused Plaintiffs to suffer severe emotional distress including but not limited to persistent stress, trauma, outrage, shock, embarrassment, anxiety, and extreme nervousness.

69. By reason of the foregoing, Plaintiffs are entitled to recover damages for all general and special damages proximately caused by Defendant CCSD's outrageous conduct as embodied in the tort of outrage, including punitive damages.

AS A SIXTH CAUSE OF ACTION

(Deprivation of Right to Free and Adequate Public Education)

70. All allegations above are incorporated and repeated herein verbatim.

71. Since the incidents complained of herein above, Defendant CCSD have failed to provide BO with a free and adequate public education.

72. Because of his disability, Defendants CCSD has discriminated against him and refused to provide him with proper education.

73. Plaintiffs seek a writ of mandamus ordering Defendants CCSD to comply with its nondiscretionary obligation to provide a free and adequate public education to BO.

AS A SEVENTH CAUSE OF ACTION

(Economic Loss of Parents Against Atwater and CCSD)

74. All allegations above are incorporated and repeated herein verbatim.

75. DO and RO have suffered economic loss as a result of the injuries sustained by BO.

76. By reason of the foregoing, Plaintiffs are entitled to recover damages for all general and special damages proximately caused by Defendant CCSD's grossly negligent, willful, wanton, reckless and careless acts and omissions, including punitive damages.

77. By reason of the foregoing, Plaintiffs are entitled to recover damages for all general and special damages proximately caused by Defendant Atwater's actual malice and intent to harm assault and battery, and outrageous conduct, including punitive damages.

CONCLUSION AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for a trial by jury and for the following relief:

- i. Judgment against Defendant Atwater for actual and punitive damages in an amount to be determined by the jury;
 - ii. Judgment against Defendant CCSD for actual and punitive damages in an amount to be determined by the jury;
 - iii. For attorney's fees and costs of this action; and
- For such other and further relief as the court deems just and proper.

McDOUGALL LAW FIRM LLC

By: _____

J. Olin McDougall, II
Davis A. Whitfield-Cargile
McDougall Law Firm, LLC
115 Lady's Island Commons
P.O. Box 1336
Beaufort, SC 29901
(843) 379-7000
Attorneys for the Plaintiffs

June 18, 2014
Beaufort, South Carolina