

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON	)	CASE NO.: <u>2026-CP-10-03548</u>
Adrian Lewis,	)	
	)	MAGISTRATE JUDGE MARY PAIGE
Plaintiff,	)	ADAMS' ANSWER TO PLAINTIFF'S
	)	COMPLAINT
v.	)	
	)	<u>JURY TRIAL DEMANDED</u>
Charleston County; Magistrate Judge	)	
Mary Paige Adams, individually and in	)	
her official capacity; and Sonya (sic)	)	
Wilson, individually and in her official	)	
capacity,	)	
	)	
Defendants.	)	

TO: JEROD D. FRAZIER, ESQ. AND TREVOR S. STEPHENS, ATTORNEYS FOR PLAINTIFF:

AND NOW COMES Defendant Magistrate Judge Mary Paige Adams, individually and in her official capacity ("Judge Adams"), by and through her undersigned counsel, and files the following Answer to Plaintiff's Complaint:

FOR A FIRST DEFENSE AND BY WAY OF ANSWER

CASE SYNOPSIS

Judge Adams expressly denies each allegation directed to her in Plaintiff's unnumbered "Case Synopsis." Plaintiff's allegations—which Judge Adams will address in detail below—are utterly false and irreconcilable with Judge Adams's record of professional and public service. She did not sexually harass Plaintiff, did not engage in conduct that could reasonably be characterized as harassment, and did not permit such conduct in her courtroom or office. Plaintiff's allegations appeared in the news media before Judge Adams even knew she had been sued, needlessly and irreparably harming her family and reputation. Judge Adams provides her own synopsis to correct the record and place Plaintiff's allegations in their proper factual context.

Judge Adams was born and raised on the Isle of Palms and graduated from Wando High School. After earning her law degree from the University of Georgia School of Law in 2002, she

spent more than a decade in Atlanta practicing law and handling complex litigation matters. She later provided litigation consulting and support services to other attorneys before entering public service in November 2017, when she accepted an appointment as a Special Assistant Administrative Law Judge, hearing and deciding appeals involving the Georgia Child Abuse Registry. In 2019, Judge Adams returned home to South Carolina and, beginning in 2020, served as an Administrative Hearing Officer with the South Carolina Department of Employment and Workforce, where she heard and decided unemployment-benefits matters.

On July 15, 2024, Judge Adams was sworn in as a Charleston County Magistrate Judge. From the outset of her service in Mount Pleasant, she focused on improving court operations, promoting professionalism, and fostering a respectful and cohesive workplace among the court staff. Her interactions with colleagues, staff, and co-workers have been professional, appropriate, and consistent with the standards expected of a judicial officer by the South Carolina Supreme Court. Until this lawsuit, and throughout more than two decades of professional service, Judge Adams had never been accused of harassment or discrimination.

Plaintiff was already employed as a constable when Judge Adams became Magistrate Judge; she did not hire him, select him, supervise his placement, or bring him into the workplace. Plaintiff's principal responsibility, as defined by statute, was serving legal documents, which required him to perform most of his duties outside the office and on the road. His in-office presence was extremely limited. During those limited occasions when Plaintiff was in the office, Judge Adams's interactions with him were professional and appropriate. To the best of her recollection, she was never alone with him. She never sent inappropriate text messages or communications to Plaintiff, never had improper physical contact with him, and never directed sexual, romantic, or otherwise inappropriate comments or conduct toward him. She never said or did anything intended to make Plaintiff uncomfortable. Nor did she observe, condone, or tolerate sexual harassment by anyone in her office. Most importantly, she never saw Plaintiff as anything more than a valued team member.

As will be shown in more detail below, some of Plaintiff's specific allegations are completely false; for example, that she placed her hands in his hair (he is bald), that she "gyrated", that she made comments of a sexual nature, that she arranged for him to sit in her line of sight, or that she made flirtatious gestures. Other allegations, such as that she showed him his picture in her Wando High School yearbook and that she once let him ride in the passenger seat of her car, are true but completely mischaracterized and innocent.

Plaintiff's allegations of sexual harassment are not simply disputed; they are cut from whole cloth. They are also inconsistent with Judge Adams's record, the limited nature of Plaintiff's workplace contact with her, and the professional manner in which she has conducted herself throughout her career. Notwithstanding the false accusations publicly made against her, Judge Adams remains committed to serving the people of Charleston County honorably, professionally, and in accordance with the responsibilities and ethical obligations of her judicial office.

PARTIES AND JURISDICTION

1. Judge Adams admits in part and denies in part the allegations of Paragraph 1 of Plaintiff's Complaint. Judge Adams admits only that Plaintiff was once employed as a constable in Charleston County. Judge Adams is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 1 of Plaintiff's Complaint. Therefore, Judge Adams denies the remaining allegations of Paragraph 1 of Plaintiff's Complaint.

2. The allegations of Paragraph 2 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams admits the allegations of Paragraph 2 of Plaintiff's Complaint.

3. The allegations of Paragraph 3 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams admits the allegations of Paragraph 3 of Plaintiff's Complaint.

4. The allegations of Paragraph 4 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams admits the allegations of Paragraph 4 of Plaintiff's Complaint.

JURISDICTION AND VENUE

5. The allegations of Paragraph 5 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams admits that this Court has jurisdiction over this case.

6. The allegations of Paragraph 6 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams admits that this Court is a proper venue for this case.

FACTUAL ALLEGATIONS

7. Judge Adams admits in part and denies in part the allegations of Paragraph 7 of Plaintiff's Complaint. Judge Adams admits only that Plaintiff was employed at one time as a constable in Charleston County. Judge Adams denies the remaining allegations of Paragraph 7 of Plaintiff's Complaint. By way of further answer, Plaintiff did not perform "courtroom and courthouse related duties." For example, he did not provide courtroom security and was not present in the courtroom during proceedings. To the contrary, practically all of his work involved serving process and other court documents, so most of his time was spent away from the Court and offices.

8. Judge Adams admits in part and denies in part the allegations of Paragraph 8 of Plaintiff's Complaint. Judge Adams admits only that when she was appointed, Plaintiff was already working as a constable in Mount Pleasant. Judge Adams is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 8 of Plaintiff's Complaint. Therefore,

Judge Adams denies the remaining allegations of Paragraph 8 of Plaintiff's Complaint.

9. Judge Adams denies the allegations of Paragraph 9 of Plaintiff's Complaint. By way of further answer, Plaintiff attended Wando High School with Judge Adams, and she once brought her yearbook to work. However, she did not "repeatedly insist[]" upon anything.

10. Judge Adams specifically denies that she ever "had a personal and sexual interest in Plaintiff" or that there were ever "inappropriate workplace dynamics," as alleged in Paragraph 10 of Plaintiff's Complaint. Judge Adams is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 10 of Plaintiff's Complaint. Therefore, Judge Adams denies the remaining allegations of Paragraph 10 of Plaintiff's Complaint. By way of further answer, while Judge Adams does not know the substance of all comments made by staff, she has never heard any staff make these statements.

11. Judge Adams denies the allegations of Paragraph 11 of Plaintiff's Complaint. By way of further answer, Judge Adams could never have placed her hand in Plaintiff's hair, as Plaintiff was bald. Judge Adams specifically denies having any intentional physical contact with Plaintiff of any kind. At most, she may have inadvertently bumped into Plaintiff in the relatively small spaces of her Court. She cannot recall ever making any comments about Plaintiff's appearance.

12. Judge Adams denies the allegations of Paragraph 12 of Plaintiff's Complaint. By way of further answer, Judge Adams never "publicly focus[ed] attention on Plaintiff." While she did once bring one of *her* yearbooks to work and sent a picture from that in a group text of limited distribution, she did not publicly focus attention on Plaintiff.

13. Judge Adams denies the allegations of Paragraph 13 of Plaintiff's Complaint. By way of further answer, she never engaged in any flirtatious or sexual conduct directed to Plaintiff. The accusation that she "expos[ed] portions of her body" is especially outlandish, particularly in light of Judge Adams's history of professionalism in the workplace.

14. Judge Adams denies the allegations of Paragraph 14 of Plaintiff's Complaint. By

way of further answer, Judge Adams has never been alone in a vehicle with Plaintiff. The incident referenced in this Paragraph was a time around the holidays when Judge Adams drove her staff (all female except for Plaintiff) to lunch at a restaurant less than a quarter mile from the workplace. They all rode in Judge Adams's older 2007 Toyota Sequoia. Because Plaintiff was the largest individual, he rode in the front seat for his comfort; he did not express any disagreement or object to doing so. The front seat of the vehicle had bucket seats with a large console between them. Judge Adams cannot recall a single instance in which she "singled Plaintiff out for preferential treatment."

15. Judge Adams denies the allegations of Paragraph 15 of Plaintiff's Complaint. By way of further answer, Judge Adams's staff could not have been aware of any "inappropriate conduct," because she did not engage in any inappropriate conduct directed toward him. The only sexually explicit comment involving Plaintiff in any way that Judge Adams has ever been aware of was an incident where *Plaintiff* told Defendant Sonia Wilson, "I think the Judge wants my body." Ms. Wilson informed Judge Adams that she told Plaintiff that—if he believed Judge Adams "wanted his body"—he should report her. Judge Adams did not learn about this comment until after the filing of this lawsuit. Judge Adams has never had any sexual or romantic feelings for Plaintiff.

16. Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 16 of Plaintiff's Complaint. Therefore, Judge Adams denies the allegations of Paragraph 16 of Plaintiff's Complaint. By way of further answer, Judge Adams has never heard and is not aware of any "graphic and offensive statements of a sexual nature regarding Plaintiff."

17. Judge Adams denies the allegations of Paragraph 17 of Plaintiff's Complaint. By way of further answer, Judge Adams did not do anything intended to place Plaintiff in her proximity or line of sight. When it became available, a table that had been located in the foyer was moved to inside the office. The moving of this table did not make Plaintiff any more visible to Judge Adams. In fact, when Judge Adams was in her chambers she could not see Plaintiff seated

at the table or any desk in the office.

18. Judge Adams denies the allegations of Paragraph 18 of Plaintiff's Complaint.

19. Judge Adams denies the allegations of Paragraph 19 of Plaintiff's Complaint. By way of further answer, while Judge Adams did try to foster cohesion and collegiality in the office, she never used any "intimate" or "inappropriate" terms to refer to anyone.

20. Judge Adams denies the allegations of Paragraph 20 of Plaintiff's Complaint. By way of further answer, when Judge Adams was appointed, she devoted significant time and effort to cleaning the offices and sending large volumes of old files to storage. It is possible that she might have inadvertently bumped into Plaintiff for a moment. She has never "pressed her body against" Plaintiff.

21. Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 21 of Plaintiff's Complaint. Therefore, Judge Adams denies the allegations of Paragraph 21 of Plaintiff's Complaint. By way of further answer, Judge Adams is not aware of any member of her staff ever making any such statements to Plaintiff. To the contrary, as noted above, Judge Adams learned after this lawsuit was filed that Defendant Sonia Wilson advised Plaintiff to report Judge Adams if he believed that she "wanted his body."

22. Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 22 of Plaintiff's Complaint. Therefore, Judge Adams denies the allegations of Paragraph 22 of Plaintiff's Complaint. By way of further answer, Judge Adams is not aware of any member of her staff intimidating Plaintiff or threatening him with a "blackball."

23. Judge Adams denies the allegations of Paragraph 23 of Plaintiff's Complaint. By way of further answer, Judge Adams has never exchanged any "personal and suggestive communications, including text messages and comments" with or about Plaintiff.

24. Judge Adams denies the allegations of Paragraph 24 of Plaintiff's Complaint. By way of further answer, over the course of a year, Plaintiff never complained of or reported the alleged "harassment" to anyone.

25. Judge Adams denies the allegations of Paragraph 25 of Plaintiff's Complaint. By way of further answer, Plaintiff's work rarely had him at the office. From the outset, most of his work was performed from his car serving process and other court documents.

26. Judge Adams denies the allegations of Paragraph 26 of Plaintiff's Complaint. By way of further answer, Judge Adams never threatened Plaintiff or his family with retaliation or harm.

27. Judge Adams denies the allegations of Paragraph 27 of Plaintiff's Complaint.

28. Judge Adams denies the allegations of Paragraph 28 of Plaintiff's Complaint. By way of further answer, Plaintiff initially indicated to Court Administration that he voluntarily resigned his position because he was experiencing personal problems, including health issues. A month after resigning, he expressed a desire to Court Administration to reapply for employment with the County. Plaintiff never told Judge Adams that he was resigning.

29. Judge Adams specifically denies that she engaged in any retaliation against Plaintiff or did anything to damage Plaintiff's reputation. Judge Adams is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 29 of Plaintiff's Complaint. Therefore, Judge Adams denies the remaining allegations of Paragraph 29 of Plaintiff's Complaint.

30. Judge Adams denies the allegations of Paragraph 30 of Plaintiff's Complaint. By way of further answer, Judge Adams engaged in no "unlawful conduct."

FIRST CAUSE OF ACTION
(Sexual Harassment/Hostile Work Environment)

31. Judge Adams incorporates by reference, as if set forth at length, the allegations of Paragraphs 1 through 30, *supra*.

32. The allegations of Paragraph 32 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 32 of Plaintiff's Complaint.

33. The allegations of Paragraph 33 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 33 of Plaintiff's Complaint.

34. The allegations of Paragraph 34 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 34 of Plaintiff's Complaint.

35. The allegations of Paragraph 35 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 35 of Plaintiff's Complaint.

36. The allegations of Paragraph 36 (including all subparagraphs thereto) of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 36 (including all subparagraphs thereto) of Plaintiff's Complaint.

37. The allegations of Paragraph 37 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 37 of Plaintiff's Complaint.

38. The allegations of Paragraph 38 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 38 of Plaintiff's Complaint.

39. The allegations of Paragraph 39 of Plaintiff's Complaint constitute conclusions of

law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 39 of Plaintiff's Complaint.

40. The allegations of Paragraph 40 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 40 of Plaintiff's Complaint.

41. The allegations of Paragraph 41 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 41 of Plaintiff's Complaint.

SECOND CAUSE OF ACTION
(Constructive Discharge)

42. Judge Adams incorporates by reference, as if set forth at length, the allegations of Paragraphs 1 through 41, *supra*.

43. The allegations of Paragraph 43 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 43 of Plaintiff's Complaint.

44. The allegations of Paragraph 44 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 44 of Plaintiff's Complaint.

45. Judge Adams denies the allegations of Paragraph 45 of Plaintiff's Complaint.

46. The allegations of Paragraph 46 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 46 of Plaintiff's Complaint.

47. Judge Adams denies the allegations of Paragraph 47 of Plaintiff's Complaint.

48. The allegations of Paragraph 48 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 48 of Plaintiff's Complaint.

49. Judge Adams denies the allegations of Paragraph 49 of Plaintiff's Complaint.

50. The allegations of Paragraph 50 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 50 of Plaintiff's Complaint.

51. Judge Adams denies the allegations of Paragraph 51 of Plaintiff's Complaint.

52. Judge Adams denies the allegations of Paragraph 52 of Plaintiff's Complaint.

53. Judge Adams denies the allegations of Paragraph 53 of Plaintiff's Complaint.

54. Judge Adams denies the allegations of Paragraph 54 of Plaintiff's Complaint.

55. Judge Adams denies the allegations of Paragraph 55 of Plaintiff's Complaint.

56. The allegations of Paragraph 56 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 56 of Plaintiff's Complaint.

57. The allegations of Paragraph 57 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 57 of Plaintiff's Complaint.

58. The allegations of Paragraph 58 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 58 of Plaintiff's Complaint.

THIRD CAUSE OF ACTION
(Negligence/Gross Negligence (SCTCA))

59. Judge Adams incorporates by reference, as if set forth at length, the allegations of Paragraphs 1 through 58, *supra*.

60. The averments of Paragraph 60 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 60 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 60 of Plaintiff's Complaint. Therefore,

Defendant Judge Adams denies the allegations of Paragraph 60 of Plaintiff's Complaint with regard to allegations that do not relate to her.

61. The averments of Paragraph 61 (including all subparagraphs thereto) of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 61 (including all subparagraphs thereto) of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 61 (including all subparagraphs thereto) of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 61 (including all subparagraphs thereto) of Plaintiff's Complaint with regard to allegations that do not relate to her.

62. The averments of Paragraph 62 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 62 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 62 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 62 of Plaintiff's Complaint with regard to allegations that do not relate to her.

63. The averments of Paragraph 63 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 63 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 63 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 63 of Plaintiff's Complaint with regard

to allegations that do not relate to her.

64. The averments of Paragraph 64 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 64 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 64 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 64 of Plaintiff's Complaint with regard to allegations that do not relate to her.

65. The averments of Paragraph 65 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 65 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 65 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 65 of Plaintiff's Complaint with regard to allegations that do not relate to her.

66. The averments of Paragraph 66 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 66 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 66 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 66 of Plaintiff's Complaint with regard to allegations that do not relate to her.

67. The averments of Paragraph 67 of Plaintiff's Complaint are directed to a party other

than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 67 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 67 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 67 of Plaintiff's Complaint with regard to allegations that do not relate to her.

68. The averments of Paragraph 68 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 68 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 68 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 68 of Plaintiff's Complaint with regard to allegations that do not relate to her.

69. The averments of Paragraph 69 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 69 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 69 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 69 of Plaintiff's Complaint with regard to allegations that do not relate to her.

70. The averments of Paragraph 70 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the

allegations of Paragraph 70 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 70 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 70 of Plaintiff's Complaint with regard to allegations that do not relate to her.

71. The averments of Paragraph 71 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 71 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 71 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 71 of Plaintiff's Complaint with regard to allegations that do not relate to her.

72. The averments of Paragraph 72 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 72 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 72 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 72 of Plaintiff's Complaint with regard to allegations that do not relate to her.

73. The averments of Paragraph 73 of Plaintiff's Complaint are directed to a party other than Defendant Judge Adams. Therefore, a response is neither necessary nor appropriate. To the extent a response is deemed necessary or appropriate, Defendant Judge Adams denies the allegations of Paragraph 73 of Plaintiff's Complaint that relate to Defendant Judge Adams. With regard to allegations that do not relate to her, Defendant Judge Adams is without sufficient

knowledge to admit or deny the allegations of Paragraph 73 of Plaintiff's Complaint. Therefore, Defendant Judge Adams denies the allegations of Paragraph 73 of Plaintiff's Complaint with regard to allegations that do not relate to her.

FOURTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress (Outrage))

74. Judge Adams incorporates by reference, as if set forth at length, the allegations of Paragraphs 1 through 73, *supra*.

75. The allegations of Paragraph 75 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 75 of Plaintiff's Complaint.

76. The allegations of Paragraph 76 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 76 of Plaintiff's Complaint.

77. The allegations of Paragraph 77 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 77 of Plaintiff's Complaint.

78. The allegations of Paragraph 78 (including all subparagraphs thereto) of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 78 (including all subparagraphs thereto) of Plaintiff's Complaint.

79. The allegations of Paragraph 79 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 79 of Plaintiff's Complaint.

80. The allegations of Paragraph 80 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 80 of Plaintiff's Complaint.

81. The allegations of Paragraph 81 of Plaintiff's Complaint constitute conclusions of

law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 81 of Plaintiff's Complaint.

82. The allegations of Paragraph 82 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 82 of Plaintiff's Complaint.

83. The allegations of Paragraph 83 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 83 of Plaintiff's Complaint.

84. The allegations of Paragraph 84 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 84 of Plaintiff's Complaint.

85. Judge Adams denies the allegations of Paragraph 85 of Plaintiff's Complaint.

86. Judge Adams denies the allegations of Paragraph 86 of Plaintiff's Complaint.

87. The allegations of Paragraph 87 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 87 of Plaintiff's Complaint.

88. The allegations of Paragraph 88 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 88 of Plaintiff's Complaint.

89. The allegations of Paragraph 89 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 89 of Plaintiff's Complaint.

FIFTH CAUSE OF ACTION
(Retaliation)

90. Judge Adams incorporates by reference, as if set forth at length, the allegations of Paragraphs 1 through 89, *supra*.

91. The allegations of Paragraph 91 of Plaintiff's Complaint constitute conclusions of

law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 91 of Plaintiff's Complaint.

92. Judge Adams denies the allegations of Paragraph 92 of Plaintiff's Complaint.

93. Judge Adams denies the allegations of Paragraph 93 of Plaintiff's Complaint.

94. Judge Adams denies the allegations of Paragraph 94 of Plaintiff's Complaint.

95. Judge Adams denies the allegations of Paragraph 95 (including all subparagraphs thereto) of Plaintiff's Complaint.

96. Judge Adams denies the allegations of Paragraph 96 of Plaintiff's Complaint.

97. Judge Adams denies the allegations of Paragraph 97 of Plaintiff's Complaint.

98. Judge Adams denies the allegations of Paragraph 98 of Plaintiff's Complaint.

99. Judge Adams is without sufficient knowledge to admit or deny the allegations of Paragraph 99 of Plaintiff's Complaint. Therefore, Judge Adams denies the allegations of Paragraph 99 of Plaintiff's Complaint.

100. Judge Adams denies the allegations of Paragraph 100 of Plaintiff's Complaint.

101. The allegations of Paragraph 101 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 101 of Plaintiff's Complaint.

102. The allegations of Paragraph 102 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 102 of Plaintiff's Complaint.

103. The allegations of Paragraph 103 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 103 of Plaintiff's Complaint.

104. The allegations of Paragraph 104 of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 104 of Plaintiff's Complaint.

DAMAGES

105. The allegations of Paragraph 105 (including all subparagraphs thereto) of Plaintiff's Complaint constitute conclusions of law to which no response is necessary or appropriate. To the extent a response is deemed necessary or appropriate, Judge Adams denies the allegations of Paragraph 105 (including all subparagraphs thereto) of Plaintiff's Complaint. By way of further answer, Plaintiff is not entitled to any relief in this matter.

FOR A FURTHER DEFENSE
(Failure to State a Claim)

106. Plaintiff's Complaint fails to state a claim upon which relief may be granted.

FOR A FURTHER DEFENSE
(Statute of Limitations)

107. Plaintiff's claims are barred by the applicable statute of limitations.

FOR A FURTHER DEFENSE
(Laches)

108. Plaintiff's claims are barred by the doctrine of laches.

FOR A FURTHER DEFENSE
(Workers Compensation)

109. Judge Adams asserts as a defense that Plaintiff's exclusive and preemptive remedy for injuries sustained in the course and scope of his employment is that from his employer under the South Carolina Workers' Compensation Act and that his claims are barred by S.C. Code § 42-1-540.

FOR A FURTHER DEFENSE
(Sovereign Immunity)

110. Plaintiff's Complaint may be barred, in whole or in part, by the sovereign immunity of the State of South Carolina and Judge Adams.

FOR A FURTHER DEFENSE
(South Carolina Tort Claims Act)

111. Plaintiff's claims are barred by the provisions of the South Carolina Tort Claims Act, including (but not limited to) S.C. Code Ann. § 15-78-60.

FOR A FURTHER DEFENSE
(South Carolina Tort Claims Act)

112. Plaintiff's recovery, if any, is limited by the provisions of the South Carolina Tort Claims Act, including but not limited to S.C. Code Ann. § 15-78-120.

FOR A FURTHER DEFENSE
(Public Duty Rule)

113. Plaintiff's claims must fail on the grounds of the well-established "public duty" doctrine.

FOR A FURTHER DEFENSE

114. Plaintiff's claims in Counts I (sexual harassment/hostile work environment) and V (retaliation) are improper because Plaintiff's exclusive remedy for sexual harassment and/or hostile work environment is that provided under the South Carolina Human Affairs Law, S.C. Code §§ 1-13-100, *et seq.*, or Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e, *et seq.*

FOR A FURTHER DEFENSE

115. Plaintiff's purported common law claims seek to assert employment discrimination and/or hostile environment claims and are barred, in whole or in part, to the extent they seek to evade the exhaustion, notice, and procedural requirements applicable to statutory discrimination claims.

FOR A FURTHER DEFENSE

116. Plaintiff's claims are barred because he failed to exhaust his administrative remedies.

FOR A FURTHER DEFENSE

117. Plaintiff's claims are barred because Judge Adams was not his "employer" under governing law.

FOR A FURTHER DEFENSE
(Waiver/Estoppel)

118. Plaintiff's claims are barred by the doctrines of waiver and/or estoppel.

FOR A FURTHER DEFENSE
(Lack of Proximate Cause)

119. No act or omission on the part of Judge Adams caused or contributed to any alleged injury or damages Plaintiff may have sustained.

FOR A FURTHER DEFENSE
(Intervening and Superseding Acts of a Third-Party)

120. Plaintiff's damages were caused by intervening negligent, willful, malicious, and criminal acts of a third party, unforeseeable to Judge Adams. Judge Adams pleads those intervening negligent, willful, malicious, and criminal acts of others as a complete bar to Plaintiff's recovery.

FOR A FURTHER DEFENSE
(Intervening and Superseding Acts of a Third-Party)

121. Plaintiff's damages were caused by a third party for whom Defendant has no liability. Judge Adams pleads those acts of others, whether intervening, superseding, or otherwise, as a complete bar to Plaintiff's recovery.

FOR A FURTHER DEFENSE
(Comparative Negligence)

122. Any damages Plaintiff seeks to recover in this case are the direct and proximate result of Plaintiff's comparative and contributory negligence and Plaintiff's recovery should be barred or, alternatively, reduced proportionately to such comparative negligence.

FOR A FURTHER DEFENSE
(Punitive Damages Not Recoverable)

123. Plaintiff may not recover punitive damages against Judge Adams pursuant to the South Carolina Tort Claims Act.

FOR A FURTHER DEFENSE

124. Judge Adams affirmatively pleads that any award of punitive damages must be limited as provided by S.C. Code § 15-32-530.

FOR A FURTHER DEFENSE

125. Plaintiff's claims for punitive damages are barred because the acts and omissions of Judge Adams complained of by the Plaintiff fail to rise to the level required to sustain an award of punitive damages. Judge Adams did not engage in any malicious, reckless, wrongful or intentional conduct upon which an award of punitive damages would be based.

126. The imposition of punitive damages on the basis of the acts or omissions of Judge Adams would represent the deprivation of liberty and property without due process of law, the imposition of cruel and unusual punishment and excessive fines and deny the equal protection of laws, in violation of the Fifth, Sixth, Eighth, and Fourteenth Amendments to the Constitution of the United States and pertinent provisions of the Constitution of the State of South Carolina.

FOR A FURTHER DEFENSE

127. Plaintiff's claims are subject to his duty to mitigate damages. To the extent that he has failed to do so, his damages should be barred or so limited.

FOR A FURTHER DEFENSE

128. Judge Adams avers that to the extent that this action, in whole or part, is frivolous, unreasonable, and groundless, she is accordingly entitled to her attorney's fees and other costs associated with the defense of this action as allowed by law.

FOR A FURTHER DEFENSE

(Reservation of Additional Defenses)

129. Judge Adams reserves the right to assert any additional and further defenses that may be revealed by information obtained during the course of investigation and discovery as permitted by the South Carolina Rules of Civil Procedure.

130. Judge Adams reserves the right to amend this Answer to assert any additional affirmative defenses based upon either law, or facts and circumstances which may be disclosed throughout the course of discovery.

PRAYER

WHEREFORE, having fully answered Plaintiff's Complaint in this matter, Judge Adams respectfully prays:

- a. That Plaintiff's claims be dismissed;
- b. That Plaintiff take nothing by reason of this suit;
- c. That Judge Adams recover her costs;
- d. That Judge Adams be granted a trial by jury; and
- e. For any such further relief to which she may be entitled.

BARNWELL, WHALEY, PATTERSON,
AND HELMS, LLC

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Mary Paige Adams, individually and in her
official capacity***

Dated: August 17, 2026
Charleston, South Carolina