

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

Christina Grant, individually and as parent
and natural guardian of her three minor
children, K.G., J.G., and E.G.,

Plaintiffs,

vs.

Neil Joost,

Defendant.

IN THE COURT OF COMMON PLEAS FOR
THE TENTH JUDICIAL CIRCUIT

Case No.: 2021-CP-04-_____

**SUMMONS
(Jury Trial Demanded)**

TO THE ABOVE-NAMED DEFENDANT:

A lawsuit has been filed against you. You are hereby summoned and required to answer the Complaint in this action, of which a copy is hereby served upon you, and to serve a copy of your Answer to the Complaint to said Plaintiffs' attorney at the address listed below within thirty days after the service hereof (exclusive of the day of such service). If you fail to do so, judgment by default will be rendered against you for the relief demanded in the Complaint. You also must file your Answer or Motion with the court.

LAW OFFICE OF KENNETH E. BERGER, LLC

s/Bradley L. Lanford

Bradley L. Lanford | blanford@bergerlawsc.com

S.C. Bar No. 70223

5205 Forest Drive, Suite Two

Columbia, South Carolina 29206

Telephone: (803) 790-2800

Facsimile: (803) 790-2870

Attorneys for the Plaintiffs

March 16, 2021

Columbia, South Carolina

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**COMPLAINT
(Jury Trial Demanded)**

The Plaintiffs (“the Grant Family”) bring this action against the defendant, Neil Joost (“Mr. Joost”), based upon the allegations set forth below.

1. The parties, subject matter, and all matters and things hereinafter alleged are within this Court’s jurisdiction.
2. At all times relevant to this action, all parties were residents of Anderson County, South Carolina.
3. Venue is proper in this Court, as Mr. Joost was a resident of Anderson County at the time this action arose, and the most substantial act and/or omission giving rise to this action occurred in Anderson County.
4. On December 27, 2020, just two days after Christmas, Mr. Joost decided to drive drunk and recklessly on Rogers Road. At the same time, the Grant Family, including Christina Grant and her three young children, K.G., J.G., and E.G., heard a loud boom and went outside only to see Mr. Joost, driving a black sports car, leave a parking lot and come barreling down the road towards their house. Mr. Joost swerved towards their driveway barely missing their two brick

pillars but unfortunately ran over Susie, the Grant Family's beloved pet. Photograph of Susie attached as Exhibit A.

5. Susie was caught under the wheel of the car and dragged several hundred feet and mangled before being left on the side of the road. The Grant family were in close proximity to and witnessed all of these events.

6. Unfortunately, Susie died as a result of the injuries she sustained after being hit and drug down the road by the Defendant, leaving behind newborn puppies the Grant Family had to expend time and money caring for.

7. The event was shocking and horrific for the Grant Family who witnessed the killing and suffered, and continue to suffer, significant emotional trauma, including nightmares and other physical manifestations of their emotional injuries.

8. The Grant Family is informed and believe Mr. Joost was negligent, careless, reckless, and/or grossly negligent in at least one of the following ways:

- a. failing to keep his vehicle under proper control;
- b. operating the vehicle at an unreasonable rate of speed;
- c. operating the vehicle while under the influence of alcohol and/or drugs to the extent his faculties were materially and appreciably impaired;
- d. aggressively operating his vehicle;
- e. failing to use the degree of care and caution that a reasonably prudent person would use under the circumstances; and
- f. in such other ways as may be found through discovery or trial.

9. By reason and in consequence of Mr. Joost's aforesaid acts and/or omissions, the Grant Family sustained past and future damages, including but not limited to:

- a. lost enjoyment of life;
- b. mental anguish and emotional trauma;
- c. humiliation;
- d. psychological trauma;
- e. property damage; and
- f. such other particulars as may be found through discovery or trial.

10. Plaintiffs are also entitled to punitive damages based upon Mr. Joost's recklessness and actions that day.

WHEREFORE, Plaintiffs pray that they recover (a) a judgment against Defendant in an amount sufficient to compensate for their actual damages as described above; (b) a judgment for an amount of punitive damages as authorized by law; (c) all costs associated with this action; and (d) such other relief as this Court may deem just and proper.

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Bradley L. Lanford | blanford@bergerlawsc.com
S.C. Bar No. 70223
5205 Forest Drive
Columbia, South Carolina 29206
Telephone: (803) 790-2800
Facsimile: (803) 790-2870
Attorneys for the Plaintiff

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