

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF LEXINGTON)	Docket No.:
)	
B. Reynolds Elliott, Personal)	
Representative of the Estate of Arturo)	
Bravo Santos, Deceased,)	
)	
Plaintiff,)	SUMMONS
)	(Jury Trial Demanded)
)	
v.)	
)	
Gregorio M. Leon a/k/a Gregorio M.)	
Leon, Jr.,)	
)	
Defendant)	
)	

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action of which a copy is herewith served upon you, and to serve a copy of your Answer on the subscribers at Post Office Box 58, Columbia, South Carolina 29202, within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiffs will apply to the court for a default judgment for the relief demanded in the Complaint.

McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, L.L.P.

S/John F. McKenzie
S.C. Bar No. 15994

S/Robert A. McKenzie
S.C. Bar No. 3855

ATTORNEYS FOR THE PLAINTIFF
1704 Main Street
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Columbia, South Carolina 29202
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Columbia, South Carolina

July 11, 2023

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COUNTY OF LEXINGTON)	Docket No.:
)	
B. Reynolds Elliott, Personal)	
Representative of the Estate of Arturo)	
Bravo Santos, Deceased,)	
)	
Plaintiff,)	COMPLAINT
)	(Jury Trial Demanded)
)	
v.)	
)	
Gregorio M. Leon a/k/a Gregorio M.)	
Leon, Jr.,)	
)	
Defendant.)	
)	

The Plaintiff, complaining of the Defendant, would respectfully show:

1. The Plaintiff is the duly appointed personal representative of the Estate of Arturo Bravo Santos, and brings this action in his capacity as such for the benefit of the heirs and statutory beneficiaries of the deceased, those entitled to recover for his wrongful death and his injuries and damages in a survival action.
2. Upon information and belief, Defendant is a resident and citizen of the County of Lexington, State of South Carolina.
3. On February 14, 2016, Plaintiff's decedent was in a vehicle parked in a parking lot in or near Lexington, South Carolina.
4. Defendant, discharged a firearm into Plaintiff's decedent's vehicle, striking Plaintiff's decedent and killing the Plaintiff's decedent.
5. That upon information and belief, Defendant was shooting into the vehicle at another person at which time the Plaintiff's decedent was struck.
6. As a direct and proximate result of the aforesaid shooting, Plaintiff's decedent,

suffered severe injuries which led to his untimely death.

7. The injuries and consequent death of Plaintiff's decedent were directly and proximately caused by the negligence, carelessness, gross negligence, and recklessness of the Defendant discharging a firearm into Plaintiff's decedent's vehicle.

8. As a direct and proximate result of the negligence, carelessness, gross negligence, and recklessness of the Defendant as set out hereinabove the decedent's statutory beneficiaries have been deprived of pecuniary support, aid, comfort, society, and advice and have suffered indescribable grief, shock, sorrow, and wounded feelings; additionally, the Plaintiff sustained damage for funeral and burial expenses incurred on account of his decedent's untimely death.

9. As a direct and proximate result of the negligence, carelessness, gross negligence, and recklessness of the Defendant as set out herein above the Plaintiff's decedent sustained severe and painful injuries to his person of which he was aware until his untimely death.

10. Plaintiff is informed and believes pursuant to the South Carolina Wrongful Death Act, he is entitled to judgment against defendant for an award of actual damages in an amount to be determined by the trier of fact and for any additional relief the court deems just and proper.

11. Plaintiff's decedent, during the course of this incident, suffered injury and damages caused by the actionable conduct of Defendant, which include, but are not limited to:

- (a) Conscious pain and suffering;
- (b) Mental and emotional distress; and
- (c) Medical expenses due to his severe injuries.

12. Plaintiff's decedent's causes of action for injuries and damages survive his death and pass to his estate.

13. As a result of the negligence, carelessness, gross negligence, and recklessness of the Defendant the Plaintiff and the deceased's statutory beneficiaries have sustained actual and punitive damages.

14. As a result of the negligence, carelessness, gross negligence, and recklessness of the Defendant the Plaintiff and the deceased's heirs at law have sustained actual and punitive damages.

WHEREFORE, the Plaintiff prays judgment against the Defendant for such actual and punitive damages as may be fair and just, for both his wrongful death and his conscious pain and suffering, the costs of this action, and for such other relief as may be appropriate under the circumstances.

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