

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
C/A NO.: 2025-CP-10-03124

Jane Doe,

Plaintiff,

v.

Patrick Bryant, John Osborne, Eric Bowman,
Pommer Group LLC, Assignment Desk Works LLC
and GLT2, LLC

Defendants.

**DEFENDANT PATRICK BRYANT'S
NOTICE OF PARTIAL MOTION TO
DISMISS PLAINTIFF JANE DOE'S
AMENDED COMPLAINT**

**TO: MARYBETH MULLANEY, ESQ., ATTORNEY FOR THE PLAINTIFF, JANE
DOE**

PLEASE TAKE NOTICE that Defendant Patrick Bryant ("Defendant Bryant"), contemporaneously with and without waiving his separately filed Motion to Strike pursuant to Rule 12(f) of the South Carolina Rules of Civil Procedure ("SCRCP"), moves for an Order dismissing certain causes of action within the Amended Complaint (the "Amended Complaint") of Plaintiff Jane Doe ("Plaintiff"). This Motion is made pursuant to Rule 12(b)(6) SCRCP and upon other law and argument as appropriate.

This Motion seeks dismissal on two grounds: (1) several of Plaintiff's causes of action which arise out of the alleged October 26, 2018 assault are barred by the applicable three-year statute of limitations; and (2) Plaintiff has not set forth facts sufficient to constitute a cause of action.

Defendant Bryant is entitled to dismissal of the following claims: (1) wrongful intrusion, (2) battery, (3) intentional infliction of emotional distress, (5) defamation, (7) conspiracy, (8) negligence, (9) negligence *per se*, and (10) gross negligence.

This Motion is based on applicable law, the pleadings filed in the action, a memorandum of law to be supplemented, and arguments of counsel at a hearing on this matter. Defendant Bryant also incorporates any applicable arguments and law that have been or will be raised by co-Defendants in this action.

Dated: November 5, 2025

GORDON REES SCULLY MANSUKHANI LLP

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