

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
FOR THE 9TH JUDICIAL CIRCUIT

CASE NO. 2025-CP-10-03124

Jane Doe,

Plaintiff,

v.

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

Defendants.

**ORDER DENYING PLAINTIFF JANE
DOE'S MOTION TO PROCEED UNDER
A PSEUDONYM AND GRANTING
DEFENDANT PATRICK BRYANT'S
MOTION TO IDENTIFY "JANE DOE
WITNESS"**

This matter came before the Court on Plaintiff Jane Doe's ("Plaintiff") Motion to Proceed Under a Pseudonym pursuant to Rule 10 of the South Carolina Rules of Civil Procedure ("SCRCP"). Defendant Patrick Bryant ("Defendant Bryant") filed a response in Opposition to Plaintiff's Motion to Proceed Under a Pseudonym, requesting that the Court require Plaintiff to disclose her own identity, and additionally, a Motion to Identify "Jane Doe Witness" pursuant to Rule 10 SCRCP and Article I, § 9 of the South Carolina Constitution. Plaintiff submitted psychiatric records in support of her motion. A hearing on these Motions was initially held on September 30, 2025. Counsel for non-party Jane Doe Witness was separately heard on October 14, 2025. For the reasons set forth below, the Court DENIES Plaintiff's Motion to Proceed Under a Pseudonym and GRANTS Defendant Bryant's Motion to Identify Jane Doe Witness.

LEGAL STANDARD

The South Carolina Constitution requires that "[a]ll courts shall be public." S.C. Const. Art. I, § 9. More specifically, SCRCP Rule 10 requires that "[i]n the summons and complaint the title of the action shall include the names of all parties, ..." SCRCP Rule 10(a).

Moreover, it is a “rare dispensation” for a plaintiff to be allowed to proceed anonymously. *James v. Jacobson*, 6 F.3d 233, 238 (4th Cir. 1993). “Pseudonymous litigation undermines the public’s right of access to judicial proceedings” because “[t]he public has an interest in knowing the names of litigants, and disclosing the parties’ identities furthers openness of judicial proceedings.” *Doe v. Public Citizen*, 749 F.3d 246, 274 (4th Cir. 2014) (citations removed.).

In *Doe v. Howe*, 362 S.C. 212, 607 S.E.2d 354 (Ct. App. 2004), the South Carolina Court of Appeals adopted the following five factors utilized by the Fourth Circuit as guidance for when to allow a party to proceed anonymously:

- “(1) whether the justification asserted by the requesting party is merely to avoid the annoyance and criticism that may attend any litigation or is to preserve privacy in a matter of sensitive and highly personal nature;
- (2) whether identification poses a risk of retaliatory physical or mental harm to the requesting party or even more critically, to innocent non-parties;
- (3) the ages of the persons whose privacy interests are sought to be protected;
- (4) whether the action is against a governmental or private party; and
- (5) the risk of unfairness to the opposing party from allowing an action against it to proceed anonymously”

Doe at 217-218 and 356-357. (citing *James v. Jacobson*, 6 F.3d 233, 238 (4th Cir.1993)).

FINDINGS AND RULINGS

The record that came before the Court demonstrates that the identities of both Plaintiff and Jane Doe Witness are already known to all Parties and the public such that neither Plaintiff nor Jane Doe Witness have any privacy interest to preserve as contemplated by the first of the five factors set forth in *Doe v. Howe*, 362 S.C. 212, 607 S.E.2d 354 (Ct. App. 2004). Additionally, Jane Doe Witness is not currently a party to this case such that she lacks standing to request

anonymity and is not entitled to the protections that may be offered to parties in the limited circumstances under which anonymity is permitted by South Carolina law.

Accordingly, Plaintiff's Motion to Proceed Under a Pseudonym is DENIED, and Defendant Bryant's Motion to Identify is GRANTED. From the date of this Order, the caption on all future filings in this case must include the Plaintiff's true and correct name. Furthermore, All Parties must refer to Plaintiff by her true and correct name in all pleadings, filings, or other court documents in this case. Finally, All Parties must identify Jane Doe Witness by her true and correct name in all pleadings, filings, or other court documents in this case.

IT IS SO ORDERED

The Honorable Judge Donald B. Hocker



Charleston Common Pleas

Case Caption: Jane Doe , plaintiff, et al VS Patrick Bryant , defendant, et al

Case Number: 2025CP1003124

Type: Order/Other

Circuit Court Judge

s/Donald B. Hocker, Judge Code 2167

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