

STATE OF SOUTH CAROLINA

COUNTY OF LEXINGTON

Melissa Sprouse Browne, individually, and
as Personal Representative of the Estate of
Charles Browne III,

Plaintiff,

vs.

Skylar Worrell, David Allen, Bonnie Allen,
and Zeco, LLC,

Defendants.

IN THE COURT OF COMMON PLEAS
OF THE ELEVENTH JUDICIAL CIRCUIT

**SUMMONS
(JURY TRIAL DEMANDED)**

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served on you, and to serve a copy of your Answer to the said Complaint upon the subscribers at the Samuels Reynolds Law Firm, 1320 Richland Street, Columbia, South Carolina, 29201, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in such Complaint.

Respectfully submitted,

s/P. Jason Reynolds

P. JASON REYNOLDS, ESQ.

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Attorneys for Plaintiff

October 28, 2025

Columbia, South Carolina

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Melissa Sprouse Browne, individually, and
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**COMPLAINT
(JURY TRIAL DEMANDED)**

COMES NOW Melissa Sprouse Browne, as the Personal Representative of the Estate of Charles Brown III, the Plaintiff in this civil action, and makes the following claims:

PARTIES

1. That the Plaintiff, Melissa Sprouse Browne, as Personal Representative of the Estate of Charles Browne III, is and was at the time of the incident complained of herein a citizen and resident of South Carolina. That Decedent, Charles Browne III, was a citizen and resident of Lexington County, South Carolina at the time of his death.

2. Upon information and belief, Defendant, Skylar Worrell, is a citizen and resident of Brunswick County, North Carolina.

3. Upon information and belief, Defendant, David Allen, is a citizen and resident of New Hanover County, North Carolina.

4. Upon information and belief, Defendant, Bonnie Allen, is a citizen and resident of New Hanover County, North Carolina.

5. Upon information and belief, Defendant Zeco, LLC, is a limited liability company registered to do business in the State of South Carolina with its principal place of business in Chattanooga, Tennessee.

VENUE

6. Venue is proper pursuant to S.C. Code Section 15-7-30 as Lexington County is where the substantial part of the alleged acts or omissions occurred.

JURISDICTION

7. The Court has subject matter jurisdiction over this matter and *in personam* jurisdiction over the parties.

FACTUAL ALLEGATIONS

8. At all times relevant herein Defendant, Skyler Worrell, was an agent and employee of Zeco, LLC, and was operating a motor vehicle in the course and scope of his employment with Zeco, LLC while a guest at Hilton Garden Inn Columbia Airport hotel on Zeco, LLC company business.

9. On June 3, 2025, around 8:40 p.m., Decedent, Charles Browne III, was riding a moped through the parking lot at the Hilton Garden Inn Columbia Airport hotel.

10. At the same time, Defendant, Worrell, was pulling into the parking lot of the hotel from the front entrance of the hotel at a speed that was too fast for conditions. Defendant, Worrell, failed to maintain and proper look out, failed to observe other traffic in the parking lot and failed to stop prior to entering into the parking lot.

11. At all times relevant herein, Defendant, Worrell, Zeco, LLC's agent, was operating a vehicle in furtherance of the business interests of Defendant, Zeco, LLC, while on a business trip, in the scope of his employment/agency with Zeco, LLC.

12. As a result of Defendant Worrell's failure to maintain and proper look out, failure to observe other traffic in the parking lot and failure to stop prior to entering the parking lot, Decedent, Charles Browne III, and Defendant, Worrell, collided. Decedent flew off the moped and landed on his back. The moped was destroyed.

13. Defendant Worrell, Zeco, LLC's agent, owed a duty to keep a lookout for other drivers in the parking lot.

14. This collision caused the death of Charles Browne III and has caused Plaintiff, Melissa Browne, to incur substantial damages as well.

15. As a result of this collision, Charles Browne III suffered extreme pain, suffering and anguish as he lay in the parking lot following the collision. Charles Browne III also suffered extreme pain, suffering and anguish as he lay in the hospital for thirty (30) days before dying from his injuries.

FOR A FIRST CAUSE OF ACTION

(Negligence, Gross Negligence, Recklessness as to Defendant Skyler Worrell)

16. Plaintiff re-alleges the allegations of Paragraphs 1 through 15 above as if restated verbatim.

17. The Plaintiff would show that, at the times and places above mentioned, Defendant, Skyler Worrell, was willful, wanton, careless, negligent, grossly negligent, and reckless in the following particulars:

- a. In operating his vehicle at an improper speed;
- b. In failing to keep a proper lookout;
- c. In failing to see or observe things which a reasonable person should see;
- d. In failing to maintain reasonable vigilance and anticipate others use of the roadway;
- e. In failing to appropriately apply his brakes or otherwise stop or move his vehicle;

- f. In failing to sound his horn;
- g. In driving his vehicle in a careless and heedless fashion through the parking lot so as to endanger other persons or property;
- h. In failing to abide by the proper rules and regulations concerning appropriate rest;
- i. In driving under an impaired and fatigued condition;
- j. In operating a vehicle without adequate lighting or reflectors;
- k. In operating a vehicle without adequate and safe brakes;
- l. In failing to use the degree of care and skill required by a safe driver under the same or similar circumstances;
- m. In such other and further ways as discovery may reveal.

18. That the above acts and omissions were the direct and proximate cause of the injuries and damages sustained by the Plaintiff herein and the said acts and omissions being in violation of the common and statutory law of the state of South Carolina and such other law as may apply.

FOR A SECOND CAUSE OF ACTION

(Negligent Entrustment as to Defendants David Allen and Bonnie Allen)

19. Plaintiff realleges the allegations of the paragraphs above as if restated verbatim, and would further allege:

20. The Defendants, David Allen and Bonnie Allen, owned the vehicle driven by the Defendant, Skyler Worrell, at the time of the accident.

21. Defendant Worrell has a horrible driving record with a long list of unsafe driving infractions.

22. Upon information and belief, Defendant Worrell was driving at the time of the accident while fatigued, distracted, or otherwise impaired.

23. That, but for David Allen and Bonnie Allen negligently entrusting their vehicle to Skyler Worrell on June 3, 2025, the Decedent would not have been involved in an accident and suffered fatal bodily injury on that day.

24. As a direct and proximate result of the negligent, careless, reckless, wanton and grossly negligent entrustment of Defendants, David Allen and Bonnie Allen's vehicle to Skyler Worrell, the Plaintiff has suffered and, in the future, will suffer from:

- a. personal injury;
- b. pain and suffering;
- c. mental anguish;
- d. loss of enjoyment of life;
- e. medical expenses;
- f. wrongful death; and
- g. any other damages recoverable under South Carolina law for which Plaintiff is entitled to recover an amount of actual, punitive, special and consequential damages to be determined by a jury at the trial of this action.

FOR A THIRD CAUSE OF ACTION
(Imputed Liability as to Defendant Zeco, LLC)

25. Plaintiff re-alleges and incorporates herein the allegations contained in the foregoing paragraphs as if fully restated verbatim.

26. At the time of the collision, Defendant Worrell, was operating the vehicle on behalf of, for the purposes of, and under the dispatch of Defendant Zeco, LLC, and with the knowledge and consent of Zeco, LLC while on company business for Zeco, LLC.

27. At the time of the collision, Defendant Worrell, was the agent and employee of Zeco, LLC, and was acting in the course and scope of his agency, or employment, and in the furtherance of the business interests of Defendant Zeco, LLC.

28. Defendant, Zeco, LLC, is responsible for the actions of Defendant Worrell, in regard to the collision described in this complaint under the doctrine of respondeat superior, agency, or apparent agency.

FOR A FOURTH CAUSE OF ACTION
(Negligent Hiring, Training, and Supervision as to Defendant, Zeco, LLC)

29. Plaintiff re-alleges and incorporates herein the allegations contained in the foregoing paragraphs as if fully restated verbatim.

30. Defendant, Zeco, LLC, was negligent, negligent per se, careless, reckless, willful and wanton in one or more of the following ways:

- a. In hiring Defendant Worrell and entrusting him to represent their company while using the roadways of South Carolina;
- b. In failing to properly train Defendant Worrell;
- c. In failing to properly supervise Defendant Worrell;
- d. In failing to implement safety practices to assure safe operation of vehicles by its agents; and
- e. In failing to exercise the degree of care and caution that a reasonable and prudent company would have exercised under the circumstances then and there prevailing.

31. Defendant's Zeco, LLC's conduct is the sole and proximate cause of the collision and the Decedent's resulting injuries and death.

FOR A FIFTH CAUSE OF ACTION
(Survival as to All Defendants)

32. Plaintiff hereby incorporates by reference and realleges every allegation of the foregoing paragraphs as if fully set forth herein verbatim and further alleges as follows:

33. As a result of the above-described acts of all Defendants, Charles Browne III was severely injured and died some time later. As a direct and proximate result of the incident, Charles Browne III underwent much physical pain, suffering, mental anguish, emotional distress and impairment of bodily efficiency for thirty (30) days before his death and incurred expenses for medical care and funeral expenses.

FOR A SIXTH CAUSE OF ACTION
(Wrongful Death as to All Defendants)

34. Plaintiff hereby incorporates by reference and realleges every allegation of the foregoing paragraphs as if fully set forth herein verbatim and further alleges as follows:

35. As a result of the above-described acts of all Defendants, the statutory beneficiaries of Charles Browne III have suffered, and will in the future suffer:

- a. Grief;
- b. Shock;
- c. Sorrow;
- d. Wounded feelings;
- e. Loss of companionship;
- f. Loss of the deceased's counsel on family matter;
- g. Emotional distress;
- h. Pecuniary loss in funeral expenses; and
- i. Loss of deceased's financial support.

FOR A SEVENTH CAUSE OF ACTION
(Loss of Consortium)

36. Plaintiff re-alleges paragraphs 1-35 as fully set forth therein and incorporate by reference.

37. Plaintiff, Melissa Sprouse Browne, was the legal spouse of Charles Browne.

38. As a direct and proximate result of Defendants' negligence, gross negligence, willful and wanton conduct, Plaintiff Melissa Sprouse Browne was denied the services, companionship, and affections of her husband Charles Browne.

WHEREFORE, Plaintiffs respectfully pray for judgment against Defendants, jointly and severally, for all damages requested in the above listed causes of action at the trial of this action, the costs and disbursements of this action and for such other and further relief as this court deems just and proper.

Respectfully submitted,

s/P. Jason Reynolds

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