

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CASE NO.: 2025-CP-07- _____
)	
QUINNETTA CLARK,)	
)	
Plaintiff,)	
)	
vs.)	SUMMONS
)	
WILLIE TRRAL, individually and d/b/a)	
WILLIE TRRAL FOOD SERVICES LLC)	
d/b/a/ WILLIE’S BREAKFAST BAR AND)	
GRILL, WILLIE TRRAL FOOD)	
SERVICES, LLC d/b/a WILLIE’S)	
BREAKFAST BAR AND GRILL, JAMES)	
WRIGHT, BERNICE WRIGHT, ANFERNY)	
FREEMAN, and JOHN DOES 1 – 10,)	
)	
Defendants.)	
)	

TO: THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the Plaintiff’s undersigned attorney at this office at Post Office Box 3766, Bluffton, South Carolina, 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, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

HORTON & ASSOCIATES, LLC

BY: /s/ Collin H. Davidson
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December 23, 2025
Bluffton, South Carolina

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CASE NO.: 2025-CP-07- _____
)	
QUINNETTA CLARK,)	
)	
Plaintiff,)	
)	
vs.)	COMPLAINT
)	
WILLIE TRRAL, individually and d/b/a)	<i>Jury Trial Demanded</i>
WILLIE TRRAL FOOD SERVICES LLC)	
d/b/a/ WILLIE’S BREAKFAST BAR AND)	
GRILL, WILLIE TRRAL FOOD)	
SERVICES, LLC d/b/a WILLIE’S)	
BREAKFAST BAR AND GRILL, JAMES)	
WRIGHT, BERNICE WRIGHT, ANFERNY)	
FREEMAN, and JOHN DOES 1 – 10,)	
)	
Defendants.)	
)	

COMES NOW PLAINTIFF demanding a jury trial and complaining of the negligent acts and/or omissions of Defendants as follows:

PARTIES, JURISDICTION, AND VENUE

1. The Plaintiff, Quinnetta Clark, is a citizen and resident of Beaufort County, South Carolina.
2. Upon information and belief, Willie Turrall (hereinafter referred to as “Defendant Turrall”) is a citizen and resident of Beaufort County, South Carolina, who at all times relevant hereto owned, controlled, oversaw, directed, and operated Willie’s Breakfast Bar and Grill, located a 7 Dr. Martin Luther King Jr. Drive, St. Helena Island, South Carolina.
3. Upon information and belief, Willie Turrall Food Services, LLC d/b/a Willie’s Breakfast Bar and Grill (hereinafter referred to as “Defendant Bar”), located at 7 Dr. Martin Luther King Jr. Drive, St. Helena Island, South Carolina, is a corporation involved in the sale of alcohol

for profit existing under the laws of the state of South Carolina, which at all times relevant hereto operated as a bar and nightclub in the County of Beaufort and was registered to do business in Beaufort County, South Carolina.

4. Upon information and belief, Defendants James and Bernice Wright (hereinafter referred to collectively as “Defendants Wright”) at all times relevant owned, controlled, and operated the real property located at 7 Dr. Martin Luther King Jr. Drive, St. Helena Island, South Carolina.

5. Upon information and belief, Anfery Freeman (hereinafter referred to as “Defendant Freeman”) is a citizen and resident of Beaufort County, South Carolina, and was identified by law enforcement as one of the assailants and/or individuals who instigated the altercation that led to the events alleged and described herein.

6. Defendant John Does 1 – 10 are unknown persons and/or entities whose who participated in, contributed to, or are otherwise legally responsible for the shootings that occurred on October 12, 2025, on St. Helena Island, South Carolina in/outside Willie’s Breakfast Bar and Grill resulting in injury to innocent members of the community, including Quinnetta Clark.

7. This Honorable Court has jurisdiction over the subject matter to this litigation and the Parties, and venue is proper in this Court, as the most substantial parts of acts and omissions giving rise to the causes of action occurred in the County of Beaufort, State of South Carolina.

FACTUAL BACKGROUND

8. On or about October 12, 2025, the Plaintiff was a lawful patron at Willie’s Breakfast Bar and Grill located at 7 Dr. Martin Luther King Jr. Drive, St. Helena Island, South Carolina 29920.

9. The Plaintiff was an invitee, attending a tailgate for an alumni event for a local high school, that was hosted by Willie's Breakfast Bar and Grill.

10. The premises had a known history of violence and/or criminal activity, and law enforcement frequently responded to the premises.

11. The Defendants were on notice that the premises presented a heightened and foreseeable risk of violent criminal activity.

12. On the date in question, as the Plaintiff was attempting to leave the crowded premises, a violent altercation broke out; four people were killed and multiple people were injured, including the Plaintiff, when multiple individuals discharged firearms on the premises.

13. Despite a reasonable opportunity for investigation, it is presently unknown and not reasonably ascertainable whether the bullet that struck the Plaintiff originated from a firearm discharged by a patron or an employee of Willie's Breakfast Bar and Grill. However, the shooting occurred within an environment created, controlled, and supervised by the Defendants, and resulted from conditions the Defendants knew or should have known posed a foreseeable risk of serious harm to patrons such as the Plaintiff.

14. As a result of the aforementioned incident, the Plaintiff was struck in the back by a bullet, from which she suffered injuries and will continue to suffer great physical pain, humiliation, and mental anguish, has expended and will in the future expend monies for medical care and treatment, has suffered the loss of enjoyment of life, and such other actual damages as the evidence will show.

15. The shooting and damages suffered by the Plaintiff as set forth herein were due to and proximately caused by the negligent, careless, reckless, wanton, and grossly negligent conduct

of the Defendants in one, some, or all of the following particulars, for which the Defendants are jointly and severally liable to the Plaintiff.

FOR A FIRST CAUSE OF ACTION
(Violation of S.C. CODE ANN. § 61-4-580, § 61-6-2220; Dram Shop Liability; Negligence *Per Se*)
As to Defendant Turrall and Defendant Bar

16. The Plaintiff incorporates Paragraphs 1 through 16 of her Complaint as if each and every allegation was set forth verbatim herein.

17. Defendant Turrall and Defendant Bar own and operate a business that functions as a commercial server of alcohol. They invite customers to come to their establishment and pay for food and drink, with the reasonable expectation that patrons will do so.

18. Defendant Turrall and Defendant Bar, by and through their employees, agents, and legal representatives, served the assailant(s) in violation of S.C. CODE ANN. §61-4-580 and §61-6-2220.

19. Defendant Turrall and Defendant Bar had a legal duty owed to the Plaintiff, as a member of the general public and a patron of the establishment, a duty of care to not allow patrons to become intoxicated, to not serve alcohol to intoxicated patrons, and to protect the Plaintiff, as a member of the general public, from the consequences of its patrons' intoxication to which Defendant Turrall and Defendant Bar contributed.

20. Defendant Turrall and Defendant Bar breached their duty owed to the Plaintiff by allowing the assailant(s), and others to become intoxicated at their bar and continuing to serve them alcohol after they knew, or should have known, they were intoxicated.

21. Pursuant to South Carolina common law and the statutes cited above, Defendant Turrall and Defendant Bar are responsible for the consequences that occurred as described above.

22. Defendant Turrall and Defendant Bar knew, or should have known, it was reasonably foreseeable that their patrons would be injured by the failure to properly hire, train, or supervise its staff, including and especially, its bartender and its security.

FOR A SECOND CAUSE OF ACTION
(Negligence, Gross Negligence, and Premises Liability)
As to Defendant Turrall, Defendant Bar, and Defendants Wright

23. The Plaintiff incorporates Paragraphs 1 through 23 of her Complaint as if each and every allegation was set forth verbatim herein.

24. At all relevant times alleged herein, Defendant Turrall and Defendant Bar operated the bar located at 7 Dr. Martin Luther King Jr. Drive, St. Helena Island, South Carolina known as Willie's Breakfast Bar and Grill as a for-profit business enterprise, and at all times relevant hereto as an establishment to which the public was invited to patronize.

25. At all relevant times alleged herein, Defendants Wright and their agents oversaw, managed, controlled, and/or otherwise exercised direct authority over the commercial property on which Willie's Breakfast Bar and Grill was located, 7 Dr. Martin Luther King Jr. Drive, St. Helena Island, South Carolina (hereinafter referred to and "the Property").

26. Upon information and belief, Defendants Wright leased for profit all or a portion of the Property to Defendant Turrall and/or Defendant Bar for the operation of Willie's Breakfast Bar and Grill, an establishment the public was invited to patronize.

27. Defendant Turrall, Defendant Bar, and Defendants Wright each owed the general public invited into the premises, including the Plaintiff, nondelegable duties of reasonable care for their safety, including:

- a. The duty to maintain the premises, free of unreasonable, foreseeable hazards that could pose a danger to the invited public;

- b. The duty to provide for their safety while on the premises, including keeping the premises in a reasonably safe condition and free from dangerous conditions that could pose hazards to the invited public, such as the reasonably foreseeable criminal acts of third parties;
- c. The duty to implement and enforce adequate security, staffing, and supervision measures to ensure the safety of the invited public while on the premises;
- d. The duty to monitor and premises for escalating or dangerous behavior on third parties on the premises;
- e. The duty to anticipate, prevent, control, or intervene in violent or potentially violent situations on the premises;
- f. The duty to warn the invited public of unreasonable risks of harm of which the Defendant(s) knew or should have known.

28. Defendant Turrall, Defendant Bar, and Defendants Wright, by and through their agents and employees, negligently and recklessly breached the duties of care owed by them to the Plaintiff in one or more of the following ways:

- a. Failing to take reasonable precautions to prevent shootings, despite actual and/or constructive knowledge of the danger;
- b. Failing to provide or require adequate security at the Property and/or Willie's Breakfast Bar and Grill;
- c. Failing to anticipate a reasonably foreseeable shooting;
- d. Failing to warn the Plaintiff of the unreasonably dangerous nature of Willie's Breakfast Bar and Grill;

- e. Conducting business in a manner as to create a foreseeable risk of harm to customers;
- f. Creating a dangerous environment;
- g. Failing to properly perform crowd control;
- h. Failing to properly train employees;
- i. By such other and further acts of negligent, reckless, and willful conduct as will be shown by the evidence produced at trial.

29. No condition existed at the time of this incident which would have prevented Defendant Turrall, Defendant Bar, or Defendants Wright in the exercise of due caution, and in furtherance of their duty to provide a safe premises for the members of the public and otherwise rendering the Property safe and fit for use as a public place.

30. Defendant Turrall, Defendant Bar, and Defendants Wright each demonstrated a complete absence of due care and such conduct and/or failure to act was negligent, grossly negligent, and reckless and constituted a willful disregard for the safety of the intended and foreseeable patrons of the Property.

31. As a direct and proximate result of one or more of the negligent, grossly negligent, reckless, and willful acts or omissions complained of above, the Plaintiff suffered a gunshot wound and sustained damages, including but not limited to the following:

- a. Healthcare expenses;
- b. Physical and mental suffering;
- c. Mental and emotional distress;
- d. Loss of ability to be productive;
- e. Loss of wages and paid time off;

- f. Loss of enjoyment of life; and
- g. Permanent physical injury and impairment.

32. As a direct and proximate result of the negligence, carelessness, gross negligence, negligence *per se*, recklessness, and departure from the duties of care owed by Defendant Turrall, Defendant Bar, and Defendants Wright, their owners and agents, the Plaintiff was injured and has incurred losses for which she is entitled to recover, to include punitive damages, from these Defendants in an amount to be determined by a jury at the trial of this action.

FOR A THIRD CAUSE OF ACTION
(Negligence, Gross Negligence, Negligence *Per Se*)
As to Defendant Freeman and John Does 1 – 10

33. The Plaintiff incorporates Paragraphs 1 through 33 of her Complaint as if each and every allegation was set forth verbatim herein.

34. Upon information and belief, Defendant Freeman opened fire on the premises of Willie's Breakfast Bar and Grill, and as a direct and proximate consequence resulted in multiple people being shot, including the Plaintiff.

35. At all times relevant, John Does 1 – 10, individually and/or collectively, through their acts and/or omissions contributed to the events alleged herein on October 12, 2025, at Willie's Breakfast Bar and Grill, and as a direct and proximate consequence resulted in multiple people being shot, including the Plaintiff.

36. As a direct and proximate result of Defendant Freeman and John Does 1 – 10's carelessness, negligence, reckless, willful, and wanton conduct as aforesaid, the Plaintiff was shot and suffered damages including but not limited to:

- a. Healthcare expenses;
- b. Physical and mental suffering;

- c. Mental and emotional distress;
- d. Loss of ability to be productive;
- e. Loss of wages and paid time off;
- f. Loss of enjoyment of life, and
- g. Permanent physical injury and impairment.

DAMAGES

37. As a proximate and foreseeable result of the Defendants' negligence, the Plaintiff was shot, endured pain and suffering, mental anguish, loss of enjoyment of life, lost wages, and suffered other damages as will be proven at trial and permitted under South Carolina law. The Plaintiff intends to seek all compensatory, special, economic, consequential, general, punitive, and all other damages permissible under South Carolina law, including, but not limited to:

- a. Personal and physical injuries;
- b. Pain and suffering;
- c. Lost past, present, and future wages;
- d. Medical expenses;
- e. Mental anguish and emotional distress;
- f. Incidental expenses; and
- g. Consequential damages to be proven at trial.

38. Each of the foregoing acts and omissions constitute an independent act of negligence on the part of the Defendants and one or more or all the above-stated acts were the proximate cause of the injuries to the Plaintiff. The Defendants are liable for the Plaintiff's injuries sustained, pain and suffering, the cost of treatment, and all other elements of damages allowed under the laws of the State of South Carolina.

39. The Plaintiff is entitled to an award of punitive damages, without limitation or cap, because the actions of the Defendants and their agents and employees showed willful misconduct, malice, fraud, wantonness, oppression, and an entire want of care, which would raise the presumption of conscious indifference to consequences and/or a specific intent to cause harm.

WHEREFORE, the Plaintiff having fully set out her causes of action, respectfully prays for a judgment against the Defendant(s) for actual damages, punitive damages, costs of this action, as determined by this Court, together with prejudgment interest on her special damages, post judgment interest as allowed by law, and costs of this action, and for such other and further relief as this Court may deem just and proper.

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