

STATE OF SOUTH CAROLINA  
COUNTY OF ORANGEBURG

ALONZO E. ADAMS, AS PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
PHILLIP MATTHEW ADAMS,

Plaintiff,

vs.

SOUTH CAROLINA STATE UNIVERSITY,

Defendant.

IN THE COURT OF COMMON PLEAS  
FOR THE FIRST JUDICIAL CIRCUIT  
CASE NO.: 2023-CP-38-\_\_\_\_\_

SUMMONS  
(Jury-Negligence)

TO: THE DEFENDANT ABOVE NAMED:

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 this complaint on the subscriber at his offices at 8 Chalmers Street, P.O. Box 1034, Charleston, South Carolina, 29402, 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 Plaintiff in this action will apply to the Court for the relief demanded in the complaint and judgment by default will be rendered against you.

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March 31, 2023

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COMPLAINT  
(Jury-Negligence)

The Plaintiff above named, complaining of the Defendant, alleges:

1. That the Plaintiff, a resident and citizen of the County of York, State of South Carolina, was duly appointed Personal Representative of the estate of Phillip Matthew Adams, deceased, by order of the Probate Court for York, and is bringing this action for conscious pain and suffering for the benefit of the Estate of Phillip Matthew Adams and is bringing this action for wrongful death for the benefit of P.A., a minor and the surviving son of deceased, in accordance with the statutes in such cases made and provided.
2. The Defendant South Carolina State University is an agency of the State of South Carolina, established, created, and existing under and by virtue of the law of the State of South Carolina.

3. Prior to April 8, 2021, Phillip Matthew Adams was a player for the South Carolina State University football team between 2006 and 2009. While a player for South Carolina State University football team, Phillip Matthew Adams sustained head trauma.
4. Prior to April 8, 2021, Phillip Matthew Adams was a player for the San Francisco 49ers in 2010, the New England Patriots in 2011, the Seattle Seahawks in 2011, the Oakland Raiders between 2012 and 2013, the Seattle Seahawks in 2014, the New York Jets in 2014 and the Atlanta Falcons in 2015 of the National Football League. While a player for the San Francisco 49ers, New England Patriots, Seattle Seahawks, Oakland Raiders, New York Jets and Atlanta Falcons of the National Football League, Phillip Matthew Adams sustained head trauma.
5. That on or about April 8, 2021, Phillip Matthew Adams died of a self-inflicted gunshot wound.
6. That on or about November 5, 2021, Phillip Matthew Adams was diagnosed by Ann C. McKee, MD of Neurology and Pathology Boston University School of Medicine with Chronic Traumatic Encephalopathy (CTE), Stage II.
7. That on or about April 8, 2021, by and through the negligence, carelessness, recklessness, willfulness, and wantonness of the Defendant, Phillip Matthew Adam's death resulted as a result of which Plaintiff sustained damages as hereinafter set forth.
8. That the aforesaid negligence, carelessness, recklessness, willfulness, and wantonness of the Defendant, consisted, among other things, of the following:

- a. In failing to educate Phillip Matthew Adams of concussion and head trauma in collegiate football and the latent neurological damage, illnesses, and decline that arise from those head impacts;
  - b. In failing to have proper policies and procedures in place to ensure the safety of Phillip Matthew Adams and players or persons and others in similar circumstances regarding concussion and head trauma in collegiate football;
  - c. In failing to properly train its employees on identifying, evaluating and properly treating Phillip Matthew Adams and players or persons and others in similar circumstances regarding head injuries;
  - d. In failing to adhere to general safety practices as well as concussion and head trauma protocols;
  - e. In failing to exercise slight care to maintain a safe environment;
  - f. In failing to exercise slight care in the hiring, retention, and supervision of coaching staff;
  - g. In failing to exercise that degree of care which a reasonably prudent person would have exercised under the same or similar circumstances
9. That by reason of and in consequence of the aforesaid negligence, carelessness, recklessness, willfulness and wantonness of the Defendant, and as a direct and proximate result thereof, Phillip Matthew Adams sustained Chronic Traumatic Encephalopathy (CTE), State II, and Phillip Matthew Adams suffered injuries, including concussion and

head trauma and as a result thereof and suffered physical pain and mental anguish and he was deprived of enjoyments of life and as a result of his injuries resulted in Phillip Matthew Adam's premature death at age thirty-two, leaving surviving his son, P.A., a minor, who has suffered extreme and severe mental shock and suffering, extreme mental anguish, grief and sorrow, and has lost the companionship of his father and has been deprived of the use and comfort of his society, and has suffered the loss of his future experience, knowledge, and judgment in managing family affairs, and has lost future services and monies he otherwise would have provided and has been pecuniarily damaged including the funeral costs expended for the burial of Phillip Matthew Adams and has been otherwise damaged, all to plaintiff's damage as personal representative of the estate of Phillip Matthew Adams.

WHEREFORE, Plaintiff as Personal Representative of the estate of Phillip Matthew Adams, deceased, for the benefit of the Estate and the surviving son of the deceased, prays for judgment against the Defendant for damages in such sums as will fully, fairly, and justly compensate Plaintiff for actual damages that may be just and proper under the circumstances.

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