

STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)
)
Jennifer Martin,)
)
Plaintiff,)
)
vs.)
)
Under Armour, Inc.,)
)
Defendant.)
)

IN THE COMMON PLEAS COURT
FIFTEENTH JUDICIAL CIRCUIT
Case #: 25-CP-26-

COMPLAINT

Comes now the Plaintiff, Jennifer Martin, (hereinafter referred to as "Plaintiff"), by and through her attorney, Daniel A. Hunnicutt, complaining of the Defendant Under Armour, Inc., (hereinafter referred to as "Defendant,") and would respectfully show unto this Honorable Court, and allege:

1. That the Plaintiff is a citizen and resident of Horry County, State of South Carolina.
2. On information and belief, Defendant Under Armour, Inc., is a company organized pursuant to the laws of the state of Maryland, and does business in the state of South Carolina. Defendant is in the business of manufacturing and selling athletic apparel and related items. At all times material herein, Defendant owned and operated a retail store located in the Tanger Outlet shopping center in or near North Myrtle Beach, South Carolina. On information and belief the name of the retail store is Under Armour Factory House.
3. All of the acts and/or omissions complained of herein happened in Horry County, South Carolina. As such Horry County is a proper venue in which to bring this action.
4. Sometime on or about April 25, 2025, Plaintiff went to the Under Armour Factory House at Tanger Outlets in or near North Myrtle Beach to do some shopping. While she was there, she was

speaking with an unknown employee of the store, and went to hand the employee some clothes she was holding on a group of hangers.

5. For some reason unbeknownst to Plaintiff, the employee angrily snatched the hangers out of her hand, and in the process Plaintiff's finger got caught in the hangers and was broken. Plaintiff ultimately required surgery for her finger.

6. Plaintiff's injuries were caused by the negligent, grossly negligent, reckless, wilfull, wanton, and intentional acts of the unknown employee. Those injuries have caused her to have to seek the help of medical professionals, and will cause her to seek medical treatment in the future. She has lost time from work, has suffered pain and suffering, and loss of enjoyment of life. Additionally, under the doctrine of respondeat superior, Defendant is responsible for the actions of the employee, as she was within the course and scope of her employment at the time of the incident.

7. Additionally, on information and belief, Defendant was negligent, grossly negligent, reckless, willful, and wanton in the training, hiring, and supervision of the unknown employee. This negligent, grossly negligent, reckless, willful, and wanton behavior either caused or contributed to the incident detailed above.

8. As a result and proximate cause of Defendants' negligence, gross negligence, carelessness, recklessness, willfulness, and wantonness, Plaintiff was forced to obtain the care and treatment of physicians, nurses, and hospitals, and will require medical care and treatment for her injuries; that Plaintiff will continue to suffer pain and permanent disability for the rest of her life; Plaintiff's enjoyment of life, ability to earn a living and use of her body has been substantially impaired.

9. Plaintiff is informed and believes that she is entitled to a judgment against Defendant in an amount sufficient to compensate Plaintiff for her actual damages and punitive damages as determined by this Court and Jury.

10. Plaintiff requests a jury trial.

WHEREFORE, Plaintiff prays:

A. For judgment against Defendant in an amount sufficient to compensate Plaintiff for Plaintiff's actual damages and punitive damages as determined by this Court and Jury;

B. For a jury trial;

C. For Costs and Disbursements of this action;

D. For such other and further relief as this Court may deem just and proper.

s/Daniel A. Hunnicutt SCB 76139

Daniel A. Hunnicutt, Esquire

Attorney For Plaintiff

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Dated: December 3, 2025