

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)

COURT OF COMMON PLEAS

Nylah Edwards,)
)
)
Plaintiff,)
)
v.)

Case No. 2025-CP-__ - _____

**SUMMONS
(JURY TRIAL DEMANDED)**

AMISUB OF SOUTH CAROLINA,)
INC dba Piedmont Medical Center,)
Defendant.)

TO THE DEFENDANT ABOVE-NAMED:

You are hereby summoned and required to answer the Complaint in this action, a copy of which is attached hereto and herewith served upon you, and to serve a copy of your answer to same upon the subscribed at 207 Whitsett Street, Greenville, South Carolina, 29601 within thirty (30) days after the service of same, exclusive of the day of such service. If you fail to answer same within the thirty (30) day period, Plaintiff will apply to the Court for the relief demanded therein and judgment will be taken against you by default.

Respectfully submitted,

ARNOLD LAW FIRM, LLC

By: S/Brian E. Arnold
BRIAN E. ARNOLD
S.C. Bar No. 16839
207 Whitsett Street
Greenville, South Carolina 29601
(864) 242-2427

STATE OF SOUTH CAROLINA)	COURT OF COMMON PLEAS
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COUNTY OF YORK)	
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)	Case No. 2025-CP-__ - _____
Nylah Edwards,)	
)	
Plaintiff,)	COMPLAINT
)	(JURY TRIAL DEMANDED)
v.)	
)	
AMISUB OF SOUTH CAROLINA,)	
INC dba Piedmont Medical Center,)	
Defendant.)	

COMES NOW Plaintiff, Nylah Edwards, by and through her counsel, Brian E. Arnold, and files this Complaint as follows:

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, as amended, the Common Law of South Carolina, and 42 U.S.C. section 1981. The jurisdiction of this Court is invoked to secure protection of and redress deprivation of rights guaranteed by state and federal law, which provides relief against sex and race discrimination and retaliation.
2. Plaintiff, a black female, is a resident of Charlotte, North Carolina and had worked at all relevant times for Defendant, a South Carolina corporation doing business as Piedmont Medical Center, in Rock Hill, South Carolina.
3. This action is filed within 90 days from the date of receipt (9-24-2025) of the Notice of Right to Sue from EEOC. Defendant is a covered employer as defined under the applicable laws.
4. Plaintiff is a Registered Nurse and began employment with Defendant in October 2024.

5. Plaintiff was subjected to harassment by a male nurse, Samuel., while employed by Defendant. Such harassment included, but was not limited to, the following:

- Whenever someone was talking about money or struggling financially, he would turn to Plaintiff and say things like, “You clearly don’t need to be worried about money.” He also asked, “What do your parents do?” — which Plaintiff understood as him implying that they must be financially supporting Plaintiff. His tone was accusatory, judgmental, and intimidating.
- When Plaintiff was not around, he would discuss her to other employees about where she lived, her lifestyle, even though she never discussed these things with him. He had been spending his free time stalking Plaintiff online to learn her personal information.
- On a daily basis, Plaintiff would recognize him staring at her from a distance and even when she would catch him, he would continue. She was fearful of him.
- Anytime Plaintiff went into the medication room to pull supplies, he would come in right after her and just stand there silently watching her while she continued her tasks. It was intimidating and frightening.
- He would make untrue accusations about Plaintiff, including telling another employee that Plaintiff was smoking weed in the bathroom.
- Multiple employees — staff and travelers — warned Plaintiff to be careful because of the comments he was making about her. One female traveler, specifically told Plaintiff to “be careful around him” because “he’s making serious allegations about you.”
- He consistently tried to insert himself near Plaintiff or watch her even when there was no work-related reason.

Samuel’s harassment was achieved out in the open. Other employees witnessed it, and warned Plaintiff because it was physically intimidating. Samuel targeted Plaintiff because she is a black female. He did not treat the white females or male employees in the same manner. The harassment was severe, pervasive, unwelcome, and threatening. It created a hostile work environment.

6. Plaintiff reported this harassment to management, specifically Amanda Fulford (Director of Nursing for Critical Care) and Holly Novak (Manager of Critical Care). Initially, when Plaintiff reported this harassment and stalking, Amanda Fulford, said: “I want to terminate him right now.” Plaintiff’s Manager, Holly Novak, said she wished Plaintiff had come to her sooner since Plaintiff was reporting months-worth of harassment. Plaintiff explained that she

didn't come forward earlier because she was the least experienced ICU nurse and didn't feel her concerns would be taken seriously. The Director of Nursing told that they would have a meeting on the topic, but the meeting was never scheduled or followed up on.

7. Unfortunately, management did not discipline or terminate the harasser and continued to schedule him to work with Plaintiff. When Plaintiff asked the on-shift charge nurse why Plaintiff was still being scheduled with the harasser, she told Plaintiff that she could leave if she felt uncomfortable or unsafe but that there would be no accommodations to allow her to work. If Plaintiff wanted to continue to work, she had to work the with man who was harassing her and making her feel unsafe.

8. Defendant had published a Code of Conduct that required employees to raise concerns and report things they believed were violations of the Code of Conduct. Employees who did not could be disciplined. Further, the Code of Conduct, in mandatory language, guaranteed that an employee who reported concerns in good faith could not, and would not, be retaliated against. When Plaintiff reported the harassment and stalking she was enduring, not only did she believe it was a violation of the harassment laws as it applied to her sex and race, she believed it violated the Code of Conduct.

9. On February 26, 2025, upon seeing that she had been scheduled with the harasser once again, Plaintiff experienced a severe panic attack at work and had to leave her shift. The environment had become so unsafe and fearful, it was intolerable for Plaintiff, as it would have been for any reasonable person. Plaintiff was forced to leave her employment, as Defendant knew, or should have known, she would have had to do. Plaintiff was constructively discharged.

10. Defendant failed to take remedial action to protect Plaintiff and its failure appeared to be in retaliation for her complaints.

**FOR A FIRST CAUSE OF ACTION
SEX/RACE HARASSMENT
(42 U.S.C. section 1981 and Title VII)**

11. Plaintiff incorporates by reference paragraphs 1 through 10 to the extent not inconsistent with the allegations contained in this First Cause of Action.

12. Plaintiff was an employee entitled to the protections of Title VII and Section 1981. While employed by Defendant, Plaintiff performed her job satisfactorily.

13. However, Defendant allowed the male nurse to harass and stalk Plaintiff in the described conduct which all were separately and collectively severe, pervasive and unwelcome and created a hostile work environment for Plaintiff. Plaintiff complained and reported the conduct to Defendant but it failed to remedy the situation. Plaintiff was forced to endure such environment which became intolerable and she was constructively discharged.

14. Such harassment was because of Plaintiff's sex and race and was intentional and in willful disregard of the rights of Plaintiff.

15. As a result of such harassment and constructive discharge, Plaintiff suffered emotional distress, loss of income and benefits and other special and general damages.

WHEREFORE, Plaintiff respectfully requests a trial by jury on her claims and that she be granted the following relief:

(a) For actual damages as proven to the trier of fact, including loss of income and benefits (past and future), compensation for emotional distress, pain and suffering, loss of enjoyment, and mental anguish;

- (b) For special damages including the loss of professional and personal reputation;
- (c) For costs of suit, including Plaintiff's reasonable attorney's fees; and
- (d) such other and further relief as this Court deems just and equitable.

FOR A SECOND CAUSE OF ACTION
RETALIATION
(42 U.S.C. section 1981 and Title VII)

16. Plaintiff incorporates by reference paragraphs 1 through 15 to the extent not inconsistent with the allegations contained in this Second Cause of Action.

17. Plaintiff was subjected to harassment and discrimination because of her sex and race and reported and complained to Defendant. Thus, Plaintiff opposed, in good faith, Defendant's harassment. Her complaints were protected activity.

18. After opposing such conduct, Defendant retaliated against Plaintiff by scheduling her to work with her harasser and stalker. Such retaliation caused severe mental distress and created an intolerably work environment. Plaintiff was constructively discharged as a result.

19. Such retaliation was intentional and willful.

20. As a result of such retaliation and constructive discharge, Plaintiff has suffered loss of income, emotional distress, humiliation, loss of reputation and other special and general damages.

WHEREFORE Plaintiff prays for a trial by jury and for this Court to enter judgment as follows:

(a) For actual damages as proven to the trier of fact, including compensation for emotional distress, pain and suffering, loss of enjoyment, lost wages (front and back), loss benefits (front and back) and mental anguish;

- (b) For special damages including the loss of professional and personal reputation;
- (c) For costs of suit, including Plaintiff's reasonable attorney's fees; and
- (d) such other and further relief as this Court deems just and equitable.

**FOR A THIRD CAUSE OF ACTION
BREACH OF CONTRACT**

21. Plaintiff incorporates by reference paragraphs 1 through 20 to the extent not inconsistent with the allegations contained in this Third Cause of Action.

22. Defendant had published a Code of Conduct that required employees to raise concerns and report things they believed were a violations of the Code of Conduct. Further, the Code of Conduct, in mandatory language, guaranteed that an employee who reported concerns in good faith could not, and would not, be retaliated against. This Policy altered the at-will status of Plaintiff's employment and created an implied contract that if Plaintiff reported concerns in good faith, Defendant would not retaliate against her.

23. Plaintiff was subjected to mistreatment and disrespectful conduct by a male employee which was a violation of the Code of Conduct specifically Defendant's "Core Values." Plaintiff reported this Defendant.

24. After raising the concerns, Defendant retaliated against Plaintiff by scheduling her to work with her harasser and stalker. Such retaliation caused severe mental distress and created an intolerably work environment. Plaintiff was constructively discharged as a result.

25. Such retaliation was intentional and willful.

26. As a result of such constructive discharge and retaliation, Plaintiff has suffered loss of income, emotional distress, humiliation, loss of reputation and other special and general damages.

WHEREFORE Plaintiff prays for a trial by jury and for this Court to enter judgment as follows:

- (a) For actual damages as proven to the trier of fact, including compensation for emotional distress, pain and suffering, loss of enjoyment, lost wages (front and back), loss benefits (front and back) and mental anguish;
- (b) For special damages including the loss of professional and personal reputation;
- (c) For costs of suit, including Plaintiff's reasonable attorney's fees; and
- (d) such other and further relief as this Court deems just and equitable.

Dated this the 8th day of December, 2025.

Respectfully submitted,

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