

Ms. Laura Campbell Waring  
Candidate for Circuit Court Judge, 9<sup>th</sup> Circuit, Seat 2  
Amendment to Personal Data Questionnaire  
Originally Submitted July 18, 2018



Question Number 1

Please amend Business Address to:  
1180 Sam Rittenberg Blvd., Suite 120, Charleston SC 29407  
(P.O. Box 31358, Charleston, SC 29417)

Question Number 11

- (b) If you are a candidate for Circuit Court, please provide a brief written description of your experience in criminal matters, including any cases handled over the past five years and include a brief description of the issues involved. Further, please provide a brief written description of your experience in civil matters, including any cases handled over the past five years and include a brief description of the types of matters handled, issues involved, and procedural history. Please include information such as the primary areas in civil court in which you practice, whether you represent plaintiffs or defendants, or both. You may go back further than five years if you feel it would assist the Commission with its assessment of your experience. If you lack experience in an area, describe how your background and procedural knowledge has prepared you to preside over such matters as a Circuit Court Judge, or how you would compensate for your lack of experience in this area. Please also indicate the frequency of your appearances before a Circuit Court Judge within the past five years.

Criminal Matters-

~~STRIKE PREVIOUS ANSWER~~

REPLACE WITH:

Although I do not practice in criminal law, my background in civil litigation and family court has provided me a wealth of transferable skill and knowledge to preside over such matters. Having tried cases for over two decades, I have handled numerous evidentiary hearings in civil matters which are substantially similar to those in criminal practice. For example, as Attorney for the Guardian ad Litem in the family court, in child abuse and neglect cases, I attended and participated in several hundred probable cause hearings (by statute, Emergency Protective Custody

hearings were required to be held within 72 hours). I also filed and argued several Motions *in Limine*, such as motions to exclude evidence of a child victim's sexual history under the Rape Shield Law. We routinely coordinated with the Solicitor's office to prepare children as witnesses within the constitutional guarantees of the Sixth Amendment to preserve the defendant's right of confrontation. We negotiated "Use Immunity" Findings, which are essentially the same standard as an *Alford* plea. In civil matters, I have handled character evidence and prior bad acts under SCRE 404, which will prepare me to perform a fair analysis in *Lyle* hearings. I have regularly dealt with hearsay and its exceptions, and I have handled impeachment evidence and motions to compel production. I have even filed one motion to suppress evidence under the Federal Wiretapping Statute. No matter whether I am sitting in General Sessions or Common Pleas, I will not lose sight that the trial court is afforded much deference, and that as the gatekeeper, I will draw on my twenty-two years of practice and discernment to make the right decision.

Additionally, I have had actual courtroom experience in (3) general sessions matters in the last ten years. I have given testimony in one instance and an affidavit in another, on behalf of the defense, and I was present for the guilty plea and sentencing of each. I was also unfortunately a member of the victim's family in one high profile murder case, where I had the opportunity to observe the trial and sentencing. Yet, in each of these experiences, I was impressed with the manner in which the presiding judges balanced the interests and sensitivities of both sides of the courtroom, and I aspire to do the same.

#### Civil Matters-

My practice has shifted from mainly defense to mainly plaintiff's cases for the last five years, and these have resolved through mediation or pre-trial negotiations, resulting in fewer court appearances than years past. Moreover, the bulk of my plaintiff's practice has been employment law, which is uniquely quiet, since both sides risk harm to reputation by litigation. I have found that settlement of highly personal matters at the administrative level allows businesses and employees to recover their losses in a cooperative manner. Sometimes a legally based demand letter or a request to cease and desist is worth far more to a client than having to endure years of uncertainty and lack of income. Thus, my last five years of practice have seen fewer litigated cases, and my clients have received the benefit. This list does not include matters in which I served as associate counsel.

STRIKE ORIGINAL ANSWER

REPLACE WITH:

- (Not in suit) Negotiated Separation and Release for Client
- Minor Settlement for State Farm Insured
- (Not in suit) Resolved employment issues for Client
- Minor Settlement for State Farm Insured
- (Not in suit) Resolved age discrimination issues for Client
- (Not in suit) Negotiated Separation and Release Agreement for Client
- Administrative Relief for Client-Harassment Allegations
- Resolved Personal Injury Defense Claim for State Farm Insured
- Death Settlement for State Farm Insured
- (Not in suit) Resolved Defamation Issues Public Official
- Minor Settlement for State Farm Insured
- (Not in suit) legal opinion for employee post termination
- Resolved Personal Injury Defense Claim for State Farm Insured
- (Not in suit) Resolved Sexual Harassment issues for client
- (Not in suit) Resolved wage hour claims for client
- Minor Settlement for State Farm Insured
- Minor Settlement for State Farm Insured
- Cease and Desist for Client
- Resolved Personal Injury Defense Claim for State Farm Insured
- Minor Settlement for State Farm Insured
- (Not in suit) Negotiated Separation and Release Agreement for Client
- Resolved Personal Injury Defense Claim for State Farm Insured
- Employment opinion for client
- Resolved Personal Injury Defense Claim for State Farm Insured
- (Not in suit) Negotiated Separation and Release Agreement for Client
- (Not in suit) Negotiated Separation and Release Agreement for Client
- (Not in suit) Negotiated Separation and Release Agreement for Client
- Employment opinion for client
- Resolved wage hour claims for client
- Resolved Personal Injury Defense Claim for State Farm Insured
- Resolved Personal Injury Defense Claim for State Farm Insured
- Resolved Personal Injury Defense Claim for State Farm Insured
- Employment opinion for client
- Resolved Personal Injury Claims for Client
- Employment/Safety Protocol Opinions for Client
- Resolved Personal Injury Defense Claim for State Farm Insured
- (Not in suit) Resolved wage hour claims for client
- (Not in suit) Resolved wage hour claims for client
- Resolved Personal Injury Defense Claim for State Farm Insured
- Guardian ad Litem Immigration Matter
- Employment opinion for Client
- (Not in suit) legal opinion for employee post termination
- Employment opinion for Client

- Resolved Personal Injury Claims for Client
- (Not in suit) Resolved wage hour claims for client
- Minor Settlement for State Farm Insured
- Employment opinion for Client
- Employment opinion for Client
- Resolved Employment/Tort Claims for Client
- Employment opinion for Client
- (Not in suit) Negotiated Separation and Release Agreement for Client
- Personal Injury Defense Claim for State Farm Insured, Dismissed
- Resolved Personal Injury Defense Claim for State Farm Insured
- (Not in suit) Resolved wage hour claims for client
- (Not in suit) Resolved wage hour claims for client
- Administrative Relief for client post-termination
- Employment opinion for Client
- Employment opinion for Client
- (In suit) Negotiated Separation and Release Agreement for Client
- Employment opinion for Client
- Employment opinion for Client
- Resolved Employment Claims for Client
- Employment opinion for Client
- Employment opinion for Client
- Resolved Employment Claims for Client
- Resolved Personal Injury Defense Claim for State Farm Insured
- Guardian ad Litem Name Change
- Employment opinion for Client
- Resolved Employment Claims for Client
- (Not in suit) Resolved wage hour claims for client
- Special Appearance for Referring Counsel
- Employment opinion for Client
- Opinion for Client
- Resolved Employment Claims for Client
- Negotiated Separation and Release Agreement for Client
- Resolved Employment/Tort Claims for Client
- Guardian ad Litem Name Change
- Administrative Relief for client post-termination
- Minor Settlement for State Farm Insured
- (In suit) Negotiated Separation and Release Agreement for Client
- (Ongoing) Employment Claims
- Minor Settlement for State Farm Insured
- (Ongoing) Insurance Claim for Client
- Employment opinion for Client
- Administrative Relief for client post-termination
- (Not in suit) Negotiated Separation and Release Agreement for Client
- (Ongoing) Employment Claims
- Employment opinion for Client
- (Ongoing) Personal Injury/Post Employment Claims

- Personal Injury/Post Employment Claims

#### Question Number 15

List five of the most significant litigated matters you have personally handled in either trial or appellate court or before a state or federal agency. Give citations if the cases were reported and describe why these matters were significant.

STRIKE ORIGINAL:

REPLACE WITH:

- (a) Caddy v. Belfair SCDC, Beaufort Div. 9:17-cv-01153 PMD-MGB Settled

This employment matter was settled during discovery, before enormous legal expenses had accrued. The allegations involved sexual harassment with not only sensitive but also novel issues which required sharp legal research on both sides, and an amicable solution was reached.

#### Question Number 39

Describe any financial arrangements or business relationships you have, or have had in the past, that could constitute or result in a possible conflict of interest in the position you seek or currently hold. Explain how you would resolve any potential conflict of interest.

My family has ties to Evening Post Industries and the Charleston Mercury. I would recuse myself from cases involving those two entities and/or their subsidiaries.

ADD:

In addition, my family has ties to Carolina Financial Corp. which may constitute a possible conflict of interest. My husband is a member of Young Clement Rivers, LLC, and I have disclosed the same on my statement of economic interests. Moreover, if seated, I will need to resign from my present employer, the law firm of Grimball and Cabaniss LLC, and I will recuse myself from any matters in which I was involved or may have acquired special knowledge by virtue my position.

#### Question Number 57

List all civic, charitable, educational, social, and fraternal organizations of which you are or have been a member during the past five years and include any offices held in such a group,

any professional honors, awards, or other forms of recognition received and not listed elsewhere.

For clarification please amend dates as follows:

- (b) Charleston Museum Board of Trustees, Member 2012-Jan 2018  
Member, Strategic Planning Committee  
FANS of the Charleston Museum 2010-present  
Co-Chairman 2015-2017

Signature: \_\_\_\_\_

October ~~24~~ 27, 2018