

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

Tanya Garrett, individually and as Personal  
Representative over the Estate of Mark  
Garrett,

Plaintiffs,

vs.

Lauren Jutila, individually; and employee of  
Medshore Ambulance Services, LLC, and  
Medshore Ambulance Services, LLC,

Defendants.

IN THE COURT OF COMMON PLEAS

CASE NO.: 2026-CP-04

**SUMMONS**

**TO THE DEFENDANT(S): LAUREN JUTILA AND MEDSHORE AMBULANCE SERVICE, LLC.**

You are hereby summoned and required to answer the Complaint in this action, a copy of which is herewith served upon you, which was filed in the Office of the Clerk of this Court on the below mentioned date; and to serve a copy of your answer to the Complaint upon the subscriber at their office, 1000 N. Main St., Post Office Box 4025, Anderson, South Carolina, within thirty days after the service hereof, exclusive of the day of such service. If you fail to answer the Complaint within that time, judgment by default will be rendered against you for the relief demanded in the Complaint

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Date: February 13,2026  
Anderson, South Carolin

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

Tanya Garrett, individually and as Personal Representative over the Estate of Mark Garrett,

Plaintiffs,

vs.

Lauren Jutila, individually; and employee of Medshore Ambulance Services, LLC, and Medshore Ambulance Services, LLC,

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CASE NO.: 2026-CP-04

**COMPLAINT**

(Jury Trial Demanded)

COMES NOW the Plaintiff, Tanya Garrett, individually and as Personal Representative of the Estate of Mark Garrett, deceased, and complains of the defendants, Lauren Jutila, individually and as an employee of Medshore Ambulance Services, LLC, and Medshore Ambulance Services, LLC, (collectively “Defendants”), who, through her undersigned counsel, respectfully shows unto the Court as follows:

**PARTIES AND JURISDICTION**

1. Plaintiff Tanya S. Garrett (hereinafter “Plaintiff”) is a citizen and resident of Anderson, SC. She is the surviving spouse of Mark C. Garrett and the duly appointed Personal Representative of the Estate of Mark Garrett, as evidenced by the Certificate of Appointment issued by the Anderson County Probate Court on October 31, 2025.
2. Plaintiff is informed and believes Defendant Lauren Jutila (hereinafter “Defendant Jutila”) is a citizen and resident of Anderson, SC. At all relevant times, Defendant Jutila was employed by Medshore Ambulance Services, LLC., as an EMT or paramedic. Defendant Lauren Jutila is sued in her individual capacity and at all relevant times was operating within the scope of her employment for Defendant Medshore in Anderson County, South Carolina.
3. Defendant Medshore Ambulance Services, LLC (“Medshore”) is a limited liability company organized and operating under the laws of the State of South Carolina, with a principal place of business located at 1000 N. Fant Street Anderson, SC 29621. Medshore

is a medical transport company that provides ambulance and emergency medical services in Anderson County and throughout the state of South Carolina and may be served through its registered agent, CT Corporation System, located at 2 Office Park Court, Suite 103, Columbia, South Carolina 29223.

4. This Court has subject matter jurisdiction over this action pursuant to the South Carolina Constitution and South Carolina statutes governing the Court of Common Pleas.
5. This Court has personal jurisdiction over Defendants because they reside in, conduct business in, and/or committed tortious acts in South Carolina.
6. Venue is proper in this Court, Anderson County, pursuant to S.C. Code Ann. § 15-7-30 because the acts and omissions giving rise to this action occurred in Anderson County, South Carolina, Defendants conduct business in Anderson County, and the decedent was domiciled in Anderson County at the time of his death.

#### FACTS

7. On or about October 1, 2025, at approximately 1:13p.m., Detective Mark Charles Garrett, a beloved husband, father, and member of the Anderson County Sheriff's office was involved in a motorcycle accident in Williamston, Anderson County, South Carolina. Detective Garrett sustained multiple traumatic injuries and blunt force trauma and was pronounced dead at the accident scene. Detective Garrett's body was transported immediately to the Morgue at the hospital.
8. At some point on or shortly after October 1, 2025, Defendant Jutila, an employee of Medshore, gained access to Detective Garrett's body at the Anderson County morgue.
9. While at the morgue, Defendant Jutila used her personal cell phone to take one or more unauthorized photographs of Detective Garrett's body.
10. Defendant Jutila had no legitimate medical, investigative, or professional reason to photograph Detective Garrett's remains.
11. After taking the unauthorized photographs, Defendant Jutila shared at least one photograph of Detective Garrett's body with at least one of her coworkers at Medshore and upon information and belief others.
12. Upon information and belief, Defendant Jutila showed the photograph(s) of Detective Garrett's body to others in the Anderson community beyond her immediate coworker(s).

13. Upon information and belief, Defendant Jutila may have transmitted the photograph(s) electronically via text message, social media applications (such as Snapchat, Instagram, Facebook, or WhatsApp), email, or other electronic means, making the images subject to cloud storage, electronic sharing, and potential viral dissemination.
14. The unauthorized photographs depicted Detective Garrett's body in a manner that was private, sensitive, and deeply personal. No photographs of Detective Garrett's remains had been made public, and details about the condition of his body were not public knowledge.

**FIRST CAUSE OF ACTION**  
**(Negligence – All Defendants)**

15. All Defendants owed a duty to the spouse and Estate of Mark Garrett to properly handle in remains in a dignified manner. Furthermore, the Defendants owed a duty of care to comply with the applicable standard of care as it relates to the transport, management and recovery of the remains of Mark Garrett.
16. The Defendants breached that duty in the following particulars:
  - a) By failing to comply with standard of care by photographing the remains of Mark Garrett without permission or legitimate reasons.
  - b) By allowing personnel to photograph human remains in plain sight and not immediately taking steps to recover the photos.
  - c) By failing to take appropriate steps to mitigate the harm caused by the actions of Defendant Jutila while she was in the employ of Defendant Medshore.
  - d) By distributing the illegally taken photographs of Mark Garrett to third parties without permission and / or cause.
17. Taking and sharing unauthorized photographs of deceased individuals has long been a known and foreseeable risk within the medical, emergency, and death-care industries, particularly in light of the widespread use of smartphones, electronic messaging, and cloud-based storage platforms.
18. Despite terminating the employee, Medshore has failed to take adequate steps to ensure that all copies of the unauthorized photograph(s) have been secured, deleted, or sequestered. Medshore has not provided Plaintiff with information regarding:
  - a. The full name and contact information of Defendant Jutila;
  - b. How many photographs were taken;

- c. Whether Defendant Jutila's personal cell phone and any cloud storage accounts have been forensically examined to ensure deletion of all copies;
  - d. The identity of all persons with whom the photographs were shared;
  - e. What steps Medshore has taken to recover all copies of the photographs from third parties;
  - f. Whether Medshore has implemented policies to prevent similar misconduct in the future.
  - g. Including but not limited to forensic imaging of personal devices and cloud-based accounts.
19. Upon information and belief, Medshore further failed to adequately vet, train, supervise, and monitor Defendant Jutila and other employees with access to deceased individuals, thereby creating an unreasonable risk that such access would be abused.
20. Defendant Jutila's misconduct was foreseeable and directly enabled by the authority, access, opportunity, and lack of oversight conferred upon her by Medshore in the course of her employment.
21. At the time Defendant Jutila took and shared the unauthorized photographs, she knew or should have known that her conduct was improper, violated privacy rights, and was inconsistent with professional and ethical standards applicable to her position.
22. On October 29, 2025, counsel for Plaintiff sent Medshore a preservation of evidence demand, placing Medshore on notice of potential civil litigation and instructing Medshore to preserve all photographs, devices, communications, and other evidence related to the incident.
23. As of the filing of this Complaint, the Anderson County Coroner's Office has stated that "an investigation into what took place at the morgue is ongoing."
24. Medshore's acts and omissions as well as those of their employee Defendant Jutila, as alleged herein, constitute negligence, gross negligence, and reckless disregard for the privacy rights and dignity of Detective Garrett and his statutory beneficiaries.
25. As a direct and proximate result of the Defendants negligence, Plaintiff has suffered legally cognizable damages, including but not limited to emotional distress and other compensable harms, in an amount to be determined by the jury.

**FOR A SECOND CAUSE OF ACTION**  
**(Invasion of Privacy As to all Defendants)**

26. Plaintiff incorporates herein and realleges the allegations in paragraphs 1 through 26, inclusive, as if fully set forth herein.
27. Under South Carolina common law, individuals have a recognized privacy interest in the physical remains and death images of their deceased loved ones.
28. Plaintiff has a protectable privacy interest in her husband's physical remains and in controlling any photographs or images of those remains.
29. Defendant Jutila in the scope of her employment with Medshore wrongfully invaded Plaintiff's privacy interest by:
  - a. Taking unauthorized photograph(s) of Detective Garrett's body at the Anderson County morgue using her personal cell phone without any legitimate medical or professional purpose;
  - b. Disclosing and sharing photograph(s) of Detective Garrett's remains to multiple persons, including coworkers and, upon information and belief, other members of the Anderson community, both in person and electronically.
30. Defendant Jutila's and Medshore's conduct constituted an unreasonable and highly offensive intrusion into Plaintiff's and the Plaintiff's private affairs and seclusion.
31. Taking and sharing photograph(s) of a deceased person's physical remains without any legitimate professional purpose and without the consent of the family is offensive and objectionable to a reasonable person of ordinary sensibilities.
32. At the time Defendant Jutila while working for Medshore took and shared the photograph(s) no images of Detective Garrett's remains had been made public, and details about the condition of his body were not public knowledge. The photograph(s) conveyed private facts concerning Detective Garrett and his family and served no legitimate public interest or concern.
33. As a direct and proximate result of Defendant Jutila's conduct, Plaintiff has suffered (and continues to suffer) severe emotional distress, mental anguish, anxiety, fear, humiliation, and loss of dignity.

34. The Defendants conduct was willful, wanton, reckless, and/or malicious, entitling Plaintiff to an award of punitive damages in an amount sufficient to punish Defendant Jutila and deter similar misconduct.

**FOR A THIRD CAUSE OF ACTION**  
**(Respondeat Superior/ Vicarious Liability- As to Defendant Medshore)**

35. Plaintiff incorporates herein and realleges the allegations in paragraphs 1 through 35, inclusive, as if fully set forth herein.
36. At all relevant times, Defendant Jutila was an employee, agent, and/or servant of Defendant Medshore and was acting under Medshore's direction, control and authority.
37. Defendant Jutila's access to Detective Garrett's physical remains was obtained solely by virtue of her employment with Medshore and the authority, trust, and responsibilities conferred upon her by Medshore in furtherance of Medshore's business and operations.
38. The acts and omissions of Defendant Jutila, as alleged herein, occurred during her assigned work hours, at Medshore-controlled facilities, and while she was performing job-related duties or exercising job-related access granted by Medshore.
39. Although Defendant Jutila's conduct was unauthorized, improper, and contrary to Medshore's duties to patients and families, the conduct nevertheless arose directly from and was incidental to the performance of her employment responsibilities and the instrumentalities, access, and opportunities provided by Medshore.
40. Defendant Jutila's misconduct was not the result of a purely personal endeavor unrelated to her employment, but instead was enabled by and inseparable from the authority, access, and position of trust Medshore placed in her as its employee.
41. Under the doctrine of respondeat superior, Defendant Medshore is vicariously liable for the tortious acts and omissions of Defendant Jutila committed within the scope of her employment, or within the apparent scope of authority conferred upon her by Medshore, even if such acts were unauthorized or contrary to Medshore's internal rules or expectations.
42. As a direct and proximate result of the conduct of Medshore's employee(s), Plaintiff has suffered (and continues to suffer) severe emotional distress, mental anguish, anxiety, fear, humiliation, and loss of dignity in an amount to be proven at trial.

**FOR A FOURTH CAUSE OF ACTION**  
**(Negligent Hiring, Training, Supervision, and Retention- As to Defendant**  
**Medshore)**

43. Plaintiff incorporates herein and realleges the allegations contained in paragraphs 1 through 43, inclusive, as if fully set forth herein.
44. At all relevant times, Defendant Medshore owed a nondelegable duty to exercise reasonable care in the hiring, training, supervision, monitoring, and retention of its employees entrusted with access to deceased individuals and their remains.
45. Taking and disseminating unauthorized photographs of deceased individuals is a known and foreseeable risk within the medical, emergency, and death-care industries, particularly given the prevalence of personal smartphones, electronic messaging, and cloud-based storage platforms.
46. Despite this foreseeable risk, upon information and belief, Medshore negligently failed to exercise reasonable care in one or more of the following respects:
  - a. Failing to adequately vet and screen Defendant Jutila and other similarly situated employees for fitness to handle sensitive access to deceased individuals;
  - b. Failing to provide adequate training regarding privacy rights, dignity of the deceased, and prohibitions against photographing or disseminating images of deceased individuals;
  - c. Failing to implement and enforce clear, written policies governing the use of personal electronic devices in areas where deceased individuals are present;
  - d. Failing to reasonably supervise, monitor, and control employees granted unsupervised access to morgues and deceased individuals;
  - e. Failing to implement safeguards reasonably designed to detect, deter, and prevent misuse of access to deceased individuals.
  - f. Such other failures as shall be identified during discovery and proven at trial.
47. As a result of these failures, Defendant Whifield was able to misuse the authority, access, and trust conferred upon her by Medshore to take disseminate unauthorized photographs of Detective Garrett's remains.

48. Medshore knew or should have known that its failure to properly train, supervise, and monitor employees with access to deceased individuals created an unreasonable risk of precisely the type of misconduct committed by Defendant Jutila.
49. Medshore's negligent hiring, training, supervision, and retention of Defendant Jutila was a proximate cause of Plaintiffs' injuries and damages.
50. Medshore's conduct demonstrated a conscious disregard for the privacy rights and dignity of deceased individuals and their families, rendering Medshore liable for compensatory damages and supporting an award of punitive damages.
51. As a direct and proximate result of Medshore's negligence, Plaintiff suffered damages, including severe emotional distress, mental anguish, anxiety, humiliation, and loss of dignity, in an amount to be determined by the jury.

**FOR A FIFTH CAUSE OF ACTION**  
**(Intentional Infliction of Emotional Distress- As to Defendant Jutila)**

52. Plaintiff incorporates herein and realleges the allegations in paragraphs 1 through 52, inclusive, as if fully set forth herein.
53. Defendant Jutila intentionally or recklessly engaged in extreme and outrageous conduct by taking unauthorized photograph(s) of Detective Garrett's remains and sharing them with others for no legitimate purpose.
54. Defendant Jutila's conduct was extreme and outrageous in that it:
  - a. Violated the sanctity and dignity of a deceased individual;
  - b. Exploited Defendant Jutila's position of trust as a medical professional;
  - c. Transformed Detective Garrett's death and his physical remains into a subject of gossip and morbid curiosity;
  - d. Was undertaken with knowledge that such conduct would cause severe emotional distress to Plaintiff and the Garrett family.
55. Defendant Jutila knew or should have known that Plaintiff was the surviving spouse of Detective Garrett and that taking and sharing photograph(s) of his remains would cause her severe emotional distress.
56. Defendant Jutila intended to cause Plaintiff severe emotional distress, or alternatively, acted with reckless disregard of the near certainty that her conduct would cause Plaintiff severe emotional distress.

57. As a direct and proximate result of Defendant Jutila's intentional and outrageous conduct, Plaintiff has suffered (and continues to suffer) severe emotional distress, including anxiety, fear, humiliation, mental anguish, and loss of peace of mind.
58. Defendant Jutila's conduct was willful, wanton, reckless, and malicious, entitling Plaintiff to punitive damages in an amount sufficient to punish Defendant Jutila and to deter similar conduct in the future.

**FOR A SIXTH CAUSE OF ACTION**  
**(Intentional Infliction of Emotional Distress- As to Defendant Medshore)**

59. Plaintiff incorporates herein and realleges the allegations in paragraphs 1 through 59, inclusive, as if fully set forth herein.
60. Defendant Medshore is vicariously liable for the intentional infliction of emotional distress committed by its employee, Defendant Jutila, under the doctrine of respondeat superior.
61. At all times material to this action, Defendant Jutila was acting within the course and scope of her employment with Medshore when she gained access to Detective Garrett's remains and took unauthorized photographs.
62. Alternatively, Defendant Medshore itself engaged in extreme and outrageous conduct by:
- a. Failing to establish any policies or training to prevent employees from taking unauthorized photograph(s) of deceased individuals;
  - b. Failing to adequately investigate the full scope of Defendant Jutila's misconduct and the extent of photograph dissemination;
  - c. Failing to provide Plaintiff with complete information about what steps have been taken to secure and destroy all copies of the unauthorized photograph(s);
  - d. Failing to implement safeguards to prevent future similar misconduct, thereby demonstrating deliberate indifference to the privacy rights and emotional well-being of families of deceased individuals.
63. Medshore's conduct, whether through the acts of its employee or its own failures, was extreme and outrageous and exceeded all bounds of decency tolerated in a civilized society.
64. As a direct and proximate result of Medshore's conduct, Plaintiff has suffered (and continues to suffer) severe emotional distress in an amount to be proven at trial.

**WHEREFORE, Plaintiff prays against the Defendant for:**

1. A trial by jury pursuant to Rule 38(b) of the South Carolina Rules of Civil Procedure.
2. Plaintiff prays for a judgment against the Defendants for actual and punitive damages in an amount to be determined by a Jury.
3. Plaintiff prays for a judgment against the Defendants for compensatory and statutory
4. damages as permitted by law.
5. For attorney's fees.
6. For the cost of this action.
7. For such other relief as the court determines is just and proper.

Respectfully submitted,

S/Rasheda S. Robinson  
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Date: February 13, 2026  
Anderson, South Carolina