

EXHIBIT C

STATE OF SOUTH CAROLINA)
)
 COUNTY OF RICHLAND)
)
 JEAN WATKINS, as Personal)
 Representative of the Estate of Mildred)
 Watkins,)
)
 Plaintiff,)
)
 vs.)
)
 STERLING HEALTHCARE, INC.,)
 COUNTRY WOOD NURSING CENTER,)
 LLC, and GUARDIAN RESOURCES, LLC,)
)
 Defendants.)
 _____)

IN THE COURT OF COMMON PLEAS
 FOR THE FIFTH JUDICIAL CIRCUIT

Case No.: 2016-CP-40-04463¹

**ORDER COMPELLING PRODUCTION
 OF INSURANCE AND FINANCIAL
 INFORMATION**

RECEIVED

Apr 05 2023

SC Court of Appeals

Following the damages hearing on November 10, 2022, the Court issues the following Order to all Defendants:

Because the Defendants have failed to cooperate with discovery and have blatantly disregarded the Orders of the Court, the Plaintiff remains without even the most basic information such as insurance policies and declarations pages, and financial information for each of the Defendants. The Court **HEREBY ORDERS** that all Defendants be required to produce any and all policies of insurance: liability, excess, umbrella, commercial, general and/or otherwise, for each Defendant and all of their owners, members, shareholders, key employees, etc., including but not limited to Robert Hagan.² This includes, but is not limited to the production of all declarations pages, full and complete policies, endorsements, exclusions, and the identities of the individuals and/or entities insured, etc. The Defendants and their owners shall also produce documents related to assets held by the Defendant companies and their owners, members, and shareholders, including

¹ The original case number for this litigation prior to the 40J was 2014-CP-40-5160.

² This is the same information that the Defendants were Ordered to produce by Judge Edgar Dickson on November 30, 2016 and discussed again in Judge Lee's Order Striking Defendants' Answer of April 19, 2018.

but not limited to Robert Hagen. This request includes, but is not limited to the production of tax returns, personal financial statements, yearly financial statements, etc.

The Plaintiff has been denied this information since first issuing discovery requests in 2014, over eight years ago. It is long overdue for the Defendants and their owners to be required to comply with the Orders and Rules of this Court and State.³

The Defendants have intentionally left the Plaintiff, and this Court, in the dark about their insurance status and their ability to pay a verdict rendered in this case. It is clear that some policy of insurance and/or some corporate and/or personal assets exist because some individual(s) and/or entity(s) has been paying multiple attorneys at Lewis Brisbois Bisgaard & Smith, LLP, a large, nationwide law firm, with attorneys for this case based in Atlanta and Savannah, to defend this matter for the past eight (8) years, including the financing of an Appeal. Clearly, the funding of the defense is coming from an insurance carrier, or one or more of the Defendant companies and/or individual owners.

THE COURT HEREBY ORDERS all insurance and financial documents related to corporate and individual assets of the Defendants, their owners, members, shareholders, and key employees, including by not limited to Robert Hagan, be produced within thirty (30) days of the date of this Order.

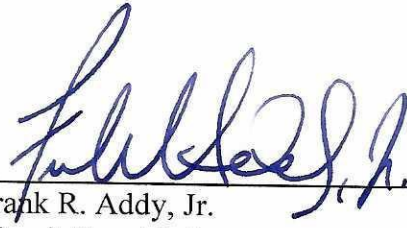
The Court further **ORDERS** that should the Defendants and their owners fail to produce this information within thirty (30) days of the date of this Order, each Defendant and individual owner / member will be required to appear before me under a Rule to Show Cause and will be subject to a finding of contempt and/or be appropriately sanctioned.⁴

³ In a separate Order filed this date, the Court awarded damages to Plaintiff. This jurist sincerely hopes that discovery of the information addressed in the present order may take place while the other Order awarding damages is on appeal.

⁴ Due to logistical issues with assigned terms of court, any subsequent hearings concerning this Order do not have to



IT IS SO ORDERED.



Frank R. Addy, Jr.
Circuit Court Judge

January 31, 2023

be specifically docketed to be heard by this jurist.