

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
)
COUNTY OF DORCHESTER) CIVIL ACTION NO.: 2023-CP-18-

BEVERLY CALLOWAY, AS)
PERSONAL REPRESENTATIVE OF)
THE ESTATE OF HATTIE ADMORE.,)

RECEIVED
Dec 13 2024
SC Court of Appeals

Summons
(Jury Trial Requested)

v.)
)
)

OAKBROOK HEALTHCARE, LLC, d/b/a)
OAKBROOK HEALTH AND)
REHABILITATION CENTER AND)
PATRICIA CASTLE)
)
)



TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your answer to said Complaint on the subscribed at their office, 101 Mulberry Street East, Hampton, South Carolina, within thirty (30) days after the service hereof; exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in this Complaint.

-Signature Page to Follow-

PARKER LAW GROUP, LLP

BY: s/Lee D. Cope

Lee D. Cope
SC Bar # 14361
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AND

Bright Matthews Law Firm, LLC
Margie Bright Matthews, Esquire
SC Bar # 13200
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ATTORNEYS FOR THE PLAINTIFF

May 8, 2023.
Hampton, South Carolina

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
)
COUNTY OF DORCHESTER) CIVIL ACTION NO.: 2023-CP-18-

BEVERLY CALLOWAY, AS)
PERSONAL REPRESENTATIVE OF)
THE ESTATE OF HATTIE ADMORE.,)

Complaint
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v.)

OAKBROOK HEALTHCARE, LLC, d/b/a)
OAKBROOK HEALTH AND)
REHABILITATION CENTER AND)
PATRICIA CASTLE)

COMES NOW Plaintiff above named, and complaining of Defendants, alleges and says as follows:

1. That the Plaintiff is a citizen and resident of Colleton County State of South Carolina, and brings this action as the Personal Representative of the Estate of Hattie Admore pursuant to the S.C. Code Ann. 15-5-90, the Survival Action Act, on behalf of the statutory beneficiaries of the deceased for all damages authorized by said statute and pursuant to the S.C. Code Ann. 15-51-10, the Wrongful Death Act, and other applicable statutory and/or common law.

2. That upon information and belief, Defendant Oakbrook Healthcare, LLC, d/b/a Oakbrook Health and Rehabilitation Center is a Delaware corporation with its principal place of business in Dorchester County, South Carolina. At the time of the acts complained of, Oakbrook Health and Rehabilitation Center was a skilled nursing home facility.

3. That upon information and belief, Defendant Patricia Castle is upon information and belief a resident of Dorchester County State of South Carolina and was the administrator of the Defendant Oakbrook Health and Rehabilitation Center.

4. That on September 3, 2020, Mrs. Admore was admitted to Oakbrook Health & Rehabilitation Center. She required total care for all daily living activities as well as monitoring her blood sugar.

5. That on admission Mrs. Admore was assessed as being at high risk for pressure injuries and had a Stage II pressure injury to her sacrum measuring .2cm x .2cm.

6. That on September 8, 2020, Mrs. Admore's blood sugar was elevated and she was given insulin. She was rechecked an hour later and it was still elevated. The nurse gave additional units of insulin and was told to continue to monitor every hour.

7. That on September 10, 2020, Mrs. Admore was found non-responsive to verbal stimuli and she was transferred to the hospital.

8. That on September 10, 2020, Mrs. Admore was admitted to Summerville Medical Center with a Stage III pressure sore on her sacrum and hyperkalemia.

9. That on September 17, 2020, Mrs. Admore was readmitted to Oakbrook.

10. That on September 21, 2020, Mrs. Admore's wound on her sacrum was unstageable.

11. That on September 22, 2020, Mrs. Admore's blood sugar was elevated again. She began to vomit and suddenly collapsed. She was sent to Summerville Medical Center.

12. That on admission to the hospital her blood sugar was >600. Shortly after arriving at the hospital, Mrs. Admore went into cardiac arrest.

13. That on September 22, 2020, Mrs. Admore passed away.

FOR A FIRST CAUSE OF ACTION
(Negligence/Gross Negligence)

14. While in the Defendants care, custody and control, Ms. Admore did suffer grave and severe injuries and humiliation at the facility as a direct and proximate result of the

following negligent, reckless, willful, careless, negligent per se and grossly negligent acts of the Defendants, combining and concurring:

- a. In failing to provide oversight of Mrs. Admore' safety and dignity;
- b. In failing to exercise due care, including without limitation, failing to care for Mrs. Admore;
- c. In failing to provide appropriate administrative oversight and management to assure Mrs. Admore was appropriately cared for;
- d. In failing to implement appropriate skin prevention measures;
- e. In failing to accurately assess Mrs. Admore's risk for development and deterioration of pressure injuries;
- f. In failing to treat Mrs. Admore's pressure sore;
- g. In failing to properly monitor and treat Mrs. Admore's diabetes;
- h. In failing to exercise reasonable care for the safety and well-being of Mrs. Admore under the circumstances;
- i. In failing to have sufficient and properly trained staff to care for its residents;
- j. In failing to have sufficient nursing and nursing assist time to provide the care that was needed for Mrs. Admore;
- k. In failing to manage its revenue and income such that appropriate care may be rendered to Mrs. Admore;
- l. In failing to implement an appropriate care plan;
- m. In failing to exercise that degree of care which a reasonably prudent person would have exercised under the same or similar circumstances; and
- n. In such other particulars as the evidence may establish.

15. That as a direct and proximate result of the aforesaid negligent, reckless, willful, careless, negligent per se and grossly negligent acts of the Defendants, the deceased Plaintiff's beneficiaries have suffered grief, sorrow, mental anguish and all of the damages which accompany the loss of a loved one; the beneficiaries have suffered pecuniary loss, all to the Plaintiff's actual and punitive damages.

16. That as a direct and proximate result of the aforesaid negligent, reckless, willful, careless, negligent per se and grossly negligent acts of the Defendants, the deceased Plaintiff suffered grave and severe injuries prior to her death; she was hospitalized; she incurred medical expenses; she suffered conscious pain and suffering and mental anguish prior to her death; she suffered a loss of her dignity and individuality; she suffered a diminished quality of life prior to her death; her estate has incurred funeral expenses.

17. That by reason of the foregoing, the Plaintiff is informed and believes that she is entitled to judgment against the Defendants on behalf of the Estate of the deceased Plaintiff, for both actual and punitive damages; all of which damages were proximately caused by the Defendants' acts and/or omissions as are more fully set forth above, in an amount as may be set and determined by the trier of fact in this matter.

WHEREFORE, Plaintiff prays this Honorable Court for a Judgment against the Defendants for actual and punitive damages in an amount to be determined by a trier of fact, and any other and further relief as this Honorable Court deems just, proper, and equitable.

-Signature Page to Follow-

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BEVERLY CALLOWAY, AS)
PERSONAL REPRESENTATIVE OF)
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**AFFIDAVIT OF MERIT OF
LUANNE TRAHANT MSN, APRN, FNP-**

v.)

OAKBROOK HEALTHCARE, LLC, d/b/a)
OAKBROOK HEALTH AND)
REHABILITATION CENTER AND)
PATRICIA CASTLE)

The Affiant, Luanne Trahant, MSN, APRN, FNP-BC, LNCC, having been duly sworn testifies as follows:

- 1) I am over 18, legally competent, and I make this affidavit based upon medical records provided to me as well as my background, education, training, and experience.
- 2) I am a registered nurse in Louisiana. I received my Bachelor of Science in Nursing from Northwestern State University in 1992 and a Master of Science in Nursing in 2005. I am a Board-Certified Family Nurse Practitioner. I have practiced in the field of which I give this opinion for at least three out of the last five years.
- 3) I have been provided with the medical records from Oakbrook Health & Rehab, Roper St. Francis, Colleton Medical Center, Sandpiper Rehab, Summerville Medical Center and Trident Medical Center pertaining to Hattie Admore.
- 4) On September 3, 2020, Mrs. Admore was admitted to Oakbrook Health & Rehab. Mrs. Admore was dependent on the staff to provide all of her nutrition and hydration needs. She was dependent on the staff to control her diabetes.
- 5) On admission she was identified to be at risk for pressure injuries. The admission assessment at Oakbrook showed that Mrs. Admore had a Stage II to her sacrum measuring .2cm x .2cm.
- 6) On September 8, 2020, Ms. Admore had been hyperglycemic with a blood sugar that was too high to read on the bedside glucometer. Insulin was given and the NP was notified. An hour later, Ms. Admore's blood sugar was still too high to register on the bedside glucometer (above 600), more insulin was given and the recheck at this time revealed a blood sugar of 564. The nurse documented that at 6pm, Ms. Admore's blood sugar was 486 and that the NP was made aware and ordered 12 units of insulin.



The nurse documented that she would recheck Ms. Admore's blood sugar "in an hour". There is no documentation that this intervention was carried out. According to the Medication Administration record, there were no other blood sugar checks documented after this event although the nursing staff had orders to check her blood sugar 4 times per day.

- 7) On September 10, 2020, Mrs. Admore was seen by the physician at the facility. She became non-responsive to verbal stimuli. She was taken to the hospital.
- 8) On admission at Trident Medical Center, the records indicate that Mrs. Admore was diagnosed with an acute kidney injury from dehydration. The physician noted a Stage III pressure injury to her coccyx/buttock area. Her laboratory values were consistent with dehydration, hyperglycemia (glucose was 309 mg/dl) and acute kidney injury.
- 9) On September 17, 2020, Mrs. Admore was discharged back to Oakbrook Health & Rehab. The sacral wound was described as measuring 6cm x 6cm x 0.1cm and was now a Stage III.
- 10) On September 21, 2020, a wound management assessment was completed that noted her sacral wound was 8.5cm x 9cm x 0.1cm with moderate serous drainage and slough.
- 11) On September 22, 2020, Mrs. Admore was found on the floor in her room. She was transferred to Summerville Medical Center.
- 12) On admission to Summerville Medical Center, the history, and physical notes that Ms. Admore suffered syncope and collapsed suddenly prior to arrival. They noted that this event was unwitnessed, and she was found on the ground vomiting, poorly responsive and lethargic.
- 13) She was noted to be significantly hypoxic, profoundly ill, covered in vomitus with dilated pupils that were sluggish to light response. Her labs were consistent with infection, acidosis, hyperglycemia (489 mg/dl) and dehydration.
- 14) Due to her severe respiratory condition, she was intubated and placed on mechanical ventilation, however, during treatment in the ED, she went into cardiac arrest and died.
- 15) The Defendants failed to implement appropriate skin preventions measures and failed to monitor Mrs. Admore's sugar.
- 16) The Defendants also failed to properly assess, monitor, and treat her diabetes to prevent prolonged hyperglycemia.
- 17) I reserve the right to alter, amend, add, or delete opinions as new information becomes available.

Luanne Trahant

Luanne Trahant, MSN, APRN, FNP-BC,

Sworn to and subscribed before me:

Alison Blair

Notary Public

Date: 01/31/2023

