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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2024-001298
Case No. 2022-CP-18-01601

Alfredo Rocha Appellant,

v.

Harold J. Murdaugh Jr. Respondent.

AND

Graciela Rocha Appellant,

v.

Harold J. Murdaugh Respondent.

RECORD ON APPEAL

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FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Dorchester
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP1801601

Graciela Rocha et al
PLAINTIFF(S)

Harold J. Murdaugh, Jr
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED** (CHECK REASON): ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled);
☐ Other
- ☐ **ACTION STRICKEN** (CHECK REASON): ☐ Rule 40(j), SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (CHECK APPLICABLE BOX):
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

Plaintiff's Motion for Judgment Notwithstanding the Verdict, or Alternatively for a New Trial was heard before the Court on June 25, 2024 via WebEx. Upon review of the Motion and upon hearing oral arguments of counsel, the Court has determined that, in taking the evidence in the light most favorable to the non-moving party, there was evidence presented at trial from which the jury could reasonably conclude as they did that the Defendant was negligent but that his negligence was not a proximate cause of Plaintiff's injuries. Therefore, Plaintiff's Motion is respectfully denied.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 07/09/2024 .

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Dorchester Common Pleas

Case Caption: Graciela Rocha , plaintiff, et al VS Harold J. Murdaugh Jr

Case Number: 2022CP1801601

Type: Order/Electronic Form 4

It is so Ordered!

s/Diane S. Goodstein

Electronically signed on 2024-07-09 14:40:49 page 3 of 3

State of South Carolina	)	
	)	In the Circuit Court
County of Dorchester	)	
	)	
Graciela Rocha	)	
	)	
Plaintiff,	)	2022-CP-18-01601
	)	
vs.	)	
	)	
Harold J. Murdaugh, Jr.,	)	
	)	
Defendant.	)	
_____	)	

Dorchester County Courthouse
June 25, 2024

TRANSCRIPT OF WEBEX HEARING

B E F O R E

The Honorable Diane Goodstein

A P P E A R A N C E S:

Gedney M. Howe, Esquire
Attorney for Plaintiff
Gedney4@gedneyhowe.com

Jeffrey M. Crudup, Esquire
Attorney for Defendant
jcrudup@clarksonwalsh.com

WEBEX HEARING WITHOUT COURT REPORTER

FOR COPIES CONTACT: Melissa R. Singletary
Certified Verbatim Court Reporter
msingletary@sccourts.org

1 THE COURT: Hello.

2 MR. CRUDUP: Hello.

3 MR. HOWE: Hello, Your Honor.

4 THE COURT: Gedney move. I want to see who's in
5 this portrait behind you.

6 MR. HOWE: Some folks.

7 THE COURT: Okay. All right. Hello, hello, hello
8 hello, hello. I'm cutting to the chase. Can I cut to the
9 chase?

10 MR. CRUDUP: Of course.

11 THE COURT: Here's the chase if you get knocked
12 down by a car --- damages, if you get knocked down by a
13 car, I mean, it could be \$10.00, it could be like \$20.00,
14 but how you get knocked down by a car and you got no
15 damages, you, you know what I mean? You've fallen into the
16 floor, I mean falling down in the road, your wife comes and
17 gets you. I'm not saying much necessarily. It can be like
18 \$0.10. But I mean, I, you know. That's the purpose, you
19 know. I need to hear that from you. I mean, you know, and
20 that's so, here's what the jury --- the jury had to decide
21 that, that the defendant hit him, didn't see him and he hit
22 him.

23 MR. CRUDUP: See I think Your Honor, I think the
24 problem, I think the problem that we had in all honesty was
25 the way the verdict form was written, it asked them to

1 determine whether or not he was negligent. And that really
2 wasn't what they were doing. Because, I mean, I talked to
3 him after I know what they did. What they were saying was
4 the way he backed up was inappropriate. He should have
5 waited for the fog to clear or whatever, but they're saying
6 he never hit. So when they said he was negligent, but
7 didn't proximately cause the injury. I understand that
8 negligent --- to be negligent you must proximately cause
9 injury but what they're saying is, no, he never hit him, he
10 just happened to be on the ground. They basically believe
11 my client story, he backed up, they said he shouldn't have
12 done it the way he did, but they're not saying that he
13 actually hit.

14 THE COURT: Well they don't get to comment on the
15 way he backed up unless it mattered.

16 MR. CRUDUP: And what I think, I think what it
17 probably should have said, what that first question
18 probably should have said was, did defendant's actions
19 proximately cause an injury or something. We should have
20 broken negligence out from did he a breach a duty? Which is
21 really what they're saying. Did he breach a duty? Did he
22 back up in a way that he shouldn't have backed up? Yes. Did
23 that breach of duty proximately caused an injury? No.
24 That's what they --- that is ultimately what they
25 determined because he said that, I mean, he said --- he

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE
CASE NUMBER 2022CP1801601

Graciela Rocha

Alfredo Rocha

Harold J. Murdaugh Jr

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for: ☐ Plaintiff ☐ Defendant
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☒ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☐ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit);
☐ Rule 43(k), SCRPC (Settled); ☐ Other: _____
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j) SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other: _____
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other: _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order; (formal order to follow) ☐ Statement of Judgment by the Court:

ORDER INFORMATION

This order ☒ ends ☐ does not end the case.

Additional Information for the Clerk: **The Jury found in favor of the Defendant.**

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk.

Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.



Honorable Diane Goodstein, Circuit Court Judge

2112

Judge Code

4/10/2024

Date

For Clerk of Court Office Use Only

This judgment was entered on , and a copy mailed first class or placed in the appropriate attorney's box on , to attorneys of record or to parties (when appearing pro se) as follows:

Gedney M. Howe IV PO Box 1034 Charleston, SC 29402

Jeffrey Michael Crudup 497 Saint Andrews Blvd Charleston
SC 29407

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)


Cheryl Graham - Clerk of Court

Court Reporter

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS

COUNTY OF DORCHESTER) CASE NO.: 2021-CP-18-01851

ALFREDO ROCHA,

Plaintiff,

v.

HAROLD MURDAUGH, JR.,

Defendant.

Verdict Form for Alfredo Rocha

WE, THE JURY, UNANIMOUSLY FIND AS FOLLOWS:

1. Was the defendant negligent?

☒ YES - Go to Question 2

☐ NO - Stop deliberations

2. Was the defendant's negligence a proximate cause of Mr. Alfredo Rocha's injuries?

☒ YES - Go to Question 3

☐ NO - Stop deliberations

3. Was Alfredo Rocha's negligence a proximate cause of his own injuries?

☐ YES - Go to Question 4

☐ NO - Go to Question 6

4. Using the combined negligence that proximately caused Mr. Alfredo Rocha's injuries as one hundred percent (100%), what percentage of that negligence is attributable to the Mr. Alfredo Rocha and what percentage is attributable to the defendant? The percentages must add up to 100%.

Plaintiff _____ %

Defendant _____ %

Total 100 %

5. Was Mr. Alfredo Rocha's negligence greater than fifty percent?

_____ YES - Stop deliberations

_____ NO - Go to Question 6

6. Please state the amount of damages sustained by the plaintiff, Mr. Alfredo Rocha. [Do not reduce the plaintiff's total damages based on the percentage of negligence by any party. After you have answered these questions, the judge will compute the amount of damages for which the defendant is responsible based on the percentage of the defendant's negligence which you have decided proximately caused Mr. Alfredo Rocha's injuries. You are to determine only the total amount of the plaintiff's damages and enter that amount below.]

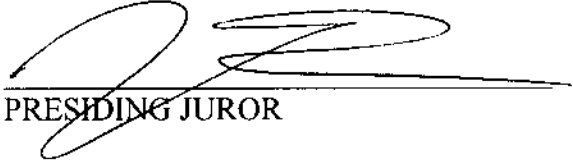
\$ _____ Actual Damages

If you found actual damages for Mr. Alfredo Rocha, then you may consider the issue of punitive damages.

7. We the jury, unanimously find for the plaintiff, Mr. Alfredo Rocha, in the amount of _____ dollars
punitive damages.

The presiding juror, acting on behalf of the unanimous jury, must sign and date this verdict form below:

4/10/24
DATE


PRESIDING JUROR

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS

COUNTY OF DORCHESTER) CASE NO.: 2021-CP-18-01851

GRACIELA ROCHA

Plaintiff,

v.

HAROLD MURDAUGH, JR.

Defendant.

Verdict Form for Graciela Rocha

If you, the jury, found actual damages for Alfredo Rocha then, with regards to Graciela Rocha's cause of action for loss of consortium, please fill out one of the two options below:

1. We, the Jury, unanimously find for the Plaintiff, Graciela Rocha
\$ _____ dollars actual damages.

OR

2. _____ We, the Jury, unanimously find for the Defendant, Mr. Harold Murdaugh, Jr.

The presiding juror, acting on behalf of the unanimous jury, must sign and date this verdict form below:

DATE

PRESIDING JUROR

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 MR. HOWE: I did not.

2 THE COURT: Congratulations.

3 MR. HOWE: I've got a pair of scissors.

4 THE COURT: Congratulations.

5 And this deposition will actually be marked as the
6 Court's exhibit so that it will now be -- it'll stay with the
7 -- the -- the other information. So it becomes the Court's
8 exhibit. It'll be marked as the Court's Exhibit 1, and
9 they'll get to -- our esteemed court reporter gets that in a
10 little bit, and it is now with Mr. Howe.

11 Let me share with you that the lawyers obviously get
12 copies of the deposition. So it very well may be that he'll
13 hand either the original to the witness, perhaps he'll use a
14 copy, but that's what a deposition is.

15 MR. HOWE: Thank you, Your Honor.

16 THE COURT: Yes.

17 (WHEREUPON, the deposition of the defendant was marked
18 and entered as Court's Exhibit Number 1.)

19 BY MR. HOWE:

20 Q: Mr. Murdaugh, I'm going to open the page for you, page --
21 page 8 of testimony, including my question on line 1 of page
22 8, and your response is on lines 2, 3, and 4.

23 A: My response is I know I never hit him -- hit the man. I
24 barely -- I did -- I came close to him, barely heard him. You
25 know, I think what my words was saying is I barely heard him

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 when he was back there hollering when I double checked my
2 mirror and seen him sitting in the road.

3 Q: Do you recall the end of the deposition when you were
4 asked if you wanted to read and sign your deposition?

5 A: No, I do not.

6 Q: That would have been the time to correct an error like
7 that.

8 A: I never read -- I never read on that at the end. You
9 never offered that.

10 Q: The court reporter offered that to you at the end of your
11 deposition.

12 A: I don't think so.

13 Q: All right. Will you take my word for it happened at the
14 end of every deposition?

15 A: No. It was never offered.

16 Q: So you say that this previous testimony of yours is
17 inaccurate?

18 A: That word is.

19 Q: I'll leave this right here in case you need to look at it
20 again. Tell me what -- about what time that morning did you
21 wake up? Was it around seven?

22 A: I was leaving between 6:30 and 7.

23 Q: All right. And again, where were you going?

24 A: Hollings Cancer Center.

25 Q: And that -- was that for a checkup?

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 A: Just bloodwork.

2 Q: Now, you were -- before this accident, you were aware of

3 Mr. Rocha's condition, were you not?

4 A: Yes. I've seen him walking around the neighborhood

5 before.

6 Q: But you were aware that he had trouble with his vision

7 and his hearing?

8 A: No. I did not know the man.

9 Q: You didn't know him at all?

10 A: No, I did not.

11 Q: Your position here today is that you never struck him?

12 A: That's right.

13 Q: You're sure of it?

14 A: Yes, sir.

15 Q: Did you look behind you when you were backing up?

16 A: I looked in my rear-view mirrors.

17 Q: Did you look over your right shoulder?

18 A: No, I did not turn around and look back because I can't

19 see out of that window.

20 Q: Is there a blind spot directly behind a vehicle when

21 you're backing up?

22 A: No, it's a long, open driveway.

23 Q: No, sir. Behind a vehicle when it's backing up, is there

24 a blind spot?

25 A: Well, it's got the head rest and the third brake light in

1 the back dash.

2 Q: So you can see absolutely everything behind you out of
3 your side-view mirrors?

4 A: Yes.

5 Q: And that's in the Chevy Malibu?

6 A: Yes.

7 Q: Let's talk about the Chevy Malibu. Is that -- whose car
8 was that?

9 A: It was my car.

10 Q: Your car or your parents' car?

11 A: Well, it was my parents' car at one time, and they gave
12 the car to me.

13 Q: And when it was your car, did everybody in your family
14 use it?

15 A: No.

16 Q: Who used it?

17 A: I was the one who drove it.

18 Q: You're the only person who ever drove that vehicle?

19 A: Until I turned it over to my daughter.

20 Q: Your wife never drove that vehicle?

21 A: No, she never drives that one.

22 Q: Would you be surprised if she testified that she had
23 driven that vehicle?

24 A: Well, I mean, I'm not with her all the time. I mean, you
25 know, she might have gotten in the car, but she's got her own

1 vehicle that she drives.

2 Q: So it's possible that she had driven this vehicle before
3 and used it to back out of this driveway?

4 A: It's possible, yes.

5 Q: How dark was it that morning when you were leaving?

6 A: It was just before daylight.

7 Q: All right. And did the -- did the brake lights in your
8 vehicle work?

9 A: Yes.

10 Q: And did -- was the rear window of your vehicle -- was it
11 covered in dew?

12 A: Yes.

13 Q: Now, is there a feature on your vehicle that helps to
14 remove that dew and remove that obstruction?

15 A: Yes, it is.

16 Q: Is that the defroster?

17 A: Yes.

18 Q: How fast does that work?

19 A: That I'm not sure of.

20 Q: Do you ever use it?

21 A: I -- I really don't.

22 Q: Did you teach your daughter how to drive?

23 A: Yes, I did.

24 Q: What did you teach her about backing up?

25 A: I taught her to check her mirrors and make sure there was

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 Q: Even though she came out while you were talking and
2 waiting for Graciella to arrive?

3 A: We was helping. The man was waiting, and she came there,
4 and we -- he got up out the road, walked to their van or
5 pickup truck, got in the truck, and they left and that was it.

6 Q: All right.

7 A: I didn't think anything of it.

8 Q: You didn't think anything of it?

9 A: I helped someone. That's what I do. If I see somebody
10 that needs help, I help them.

11 Q: You were worried enough about him to follow up?

12 A: Yes, I was concerned the man was hurt. Yes.

13 Q: How would that injury have occurred?

14 A: There's a bad spot in the road. Evidently, he tripped,
15 and he -- he walks with a cane. He doesn't walk very well.
16 He tripped over that bad spot, and I complained about the bad
17 spot on the road for the last ten years. That's where he was
18 sitting in the middle of the road, right where there's a dip
19 in the road.

20 Q: So it's your position here today that Mr. Rocha is not
21 telling the truth?

22 A: That's correct.

23 Q: That Mr. Rocha has been enduring three-and-a-half years
24 of litigation and just lying the whole time?

25 A: Evidently.

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 Q: Getting into your car, did you hear Mr. Rocha or see him
2 at any time?

3 A: No, I did not.

4 Q: It was pretty quiet that morning?

5 A: Yes.

6 Q: Did you hear him walking?

7 A: No.

8 Q: Did you hear anybody crying for help?

9 A: No.

10 Q: And then what did you do?

11 A: I got in my car, rolled the windows down, and then I
12 started backing up. When I got to the very end of the
13 driveway, because it's a pretty long driveway, I stopped and I
14 went to start backing out, and I heard him hollering
15 something, and I looked in the mirror again and I seen him
16 sitting in the middle of the road.

17 Q: And when you rolled down your windows while you were
18 still parked, why did you roll down those windows?

19 A: Because I always roll my windows down because there's dew
20 on them.

21 Q: Is it safer to be able to see behind you?

22 A: That's correct.

23 Q: And when you rolled your windows down, did you hear
24 anything?

25 A: No, I did not.

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 Q: Was it pretty quiet?

2 A: Yes.

3 Q: And then you backed your car up; right?

4 A: Yes.

5 Q: And it's your testimony that you stopped at the end of

6 your driveway?

7 A: That's correct.

8 Q: With your windows down?

9 A: That's correct.

10 Q: At that time, did you hear anything?

11 A: That's when I heard him.

12 Q: I believe you testified --

13 A: I could just barely hear something, and I looked again.

14 Q: I believe your testimony was that you stopped at the end

15 of the driveway and started to reverse and then you heard him?

16 A: Well, yes. I had to stop at the end of the driveway and

17 start backing out right there at the driveway. I never even

18 left the driveway.

19 Q: But it was prior -- it was after that stop when you re-

20 engaged your vehicle in motion, that was when you heard him?

21 A: Well, I hadn't put on the brake. And yes, when I went to

22 release the brakes is when I heard him holler, and I could see

23 him. In the reverse lights, I could see him sitting to my

24 left.

25 Q: You couldn't see him before that precise moment? You

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 never saw or heard anything?

2 A: No, I did not.

3 Q: What do you think he was doing at that time?

4 A: I have no idea.

5 Q: Was he just laying in the road waiting for you?

6 A: Well, he was sitting up when I seen him, just sitting in
7 the middle of the road.

8 Q: Before you saw him, do you think he was just sitting
9 there?

10 A: Well, before I saw him, I don't know what he was doing.
11 I have no idea.

12 Q: What do you think he was doing? Waiting for you?

13 A: I have no idea what he was doing. I mean, evidently, he
14 was out on his walk before daylight.

15 Q: And you were aware that he walked in the mornings?

16 A: No. I've seen him in the middle of the day, but no, I'm
17 not aware that he walked in the mornings a bit. I didn't pay
18 that much attention.

19 Q: Again, Mr. Murdaugh, I believe your previous testimony at
20 your deposition was that you did know he walked in the
21 mornings.

22 A: I have -- not that early. I have seen him walking. So,
23 I mean . . .

24 Q: There's a guy that you know has some limitations and you
25 know he walks around in the morning; right?

HAROLD MURDAUGH - DIRECT BY MR. HOWE

1 A: Sometimes, yes.

2 Q: So you were on alert that something or somebody might be
3 behind you?

4 A: I guess.

5 Q: These are not trick questions, I promise.

6 A: It sounds like it.

7 Q: Did you look in your rear-view mirror while you were
8 backing out of your driveway?

9 A: I looked in my side mirrors.

10 Q: Did you look in your rear-view mirror?

11 A: Well, I'm sure I checked all three, but I mainly use my
12 side mirrors.

13 Q: Mr. Murdaugh, we can be here for a long time or we can be
14 here for a short time.

15 A: Okay. I looked in my side mirrors back and forth.

16 Q: So that's a, no, you did not look at your rear-view
17 mirror?

18 A: I guess not, no.

19 Q: Did you turn your head to look directly behind you?

20 A: No.

21 Q: Did you see anything behind you?

22 A: No.

23 Q: So while you were alert, backing out, you saw the
24 plaintiff and then hit him?

25 A: I did not hit him.

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 MR. HOWE: Mr. Murdaugh, that's all I have for you. Mr.
2 Crudup's going to ask you some questions.

3 THE COURT: Cross-examination.

4 MR. CRUDUP: Thank you, Your Honor.

5 CROSS-EXAMINATION

6 BY MR. CRUDUP:

7 Q: You went over some of this stuff, so I'm going to try and
8 be as quick as I can. Tell the jury where you're from.

9 A: I'm sorry?

10 Q: Tell the jury where you're from.

11 A: Summerville.

12 Q: And where did you go to high school?

13 A: Summerville.

14 Q: I'm going to -- what year did you graduate?

15 A: I guess that would have been -- I -- actually, I didn't
16 graduate. I got out early, probably around '79.

17 Q: Okay. Are you married?

18 A: Yes.

19 Q: How long have you been married to your wife?

20 A: I was married in '79.

21 Q: Do you have any kids?

22 A: Yes.

23 Q: You said you have four?

24 A: Four, four daughters.

25 Q: And you mentioned earlier you -- only -- at the time of

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 this accident, only one lived with you; correct?

2 A: Correct.

3 Q: Do you work now?

4 A: No.

5 Q: Why don't you work?

6 A: I'm disabled because of leukemia and bone damage.

7 Q: What was the last thing you did before you became sick
8 and couldn't work anymore?

9 A: I was shop --

10 MR. HOWE: Your Honor, for a moment, I just want to
11 object. This is beyond the scope of cross and it's not -- or
12 direct, and it's not exactly relevant. Can we get where we're
13 going?

14 THE COURT: Let me hear the last -- I didn't hear the
15 last question.

16 MR. CRUDUP: I asked him what he did before -- the last
17 job he had before this accident.

18 THE COURT: I gotcha.

19 MR. HOWE: It was the line of questioning, Your Honor.

20 THE COURT: I understand. Overruled. You may proceed.

21 MR. CRUDUP: Thank you.

22 BY MR. CRUDUP:

23 Q: Tell the jury what you did before this.

24 A: I was a mechanic shop foreman at Knights Concrete
25 Service.

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 Q: And at some point, were you -- were you overseas?

2 A: Yes.

3 Q: What did you -- well, tell the jury about that. What
4 were you doing?

5 A: I was a DoD employee, worked for the Army doing battle
6 damage repair on MRAP vehicles in Iraq and Afghanistan for
7 five years.

8 Q: And about when was that exactly?

9 A: I went over there in '09.

10 Q: So you were there for about five years?

11 A: Yes.

12 Q: And out of curiosity, what is battle -- when you say
13 battle damaged vehicles?

14 A: They've got the mine-resistant vehicles, the big MRAP
15 vehicles. Soldiers go out in the field with them, and if they
16 get hit and blown up, they would have them brought back in and
17 we would totally rebuild those vehicles so they could put them
18 back out again.

19 Q: Do you have any experience as a professional driver as
20 opposed to a mechanic?

21 A: Yes. I was a tractor trailer driver for about 12 years.

22 Q: And you said 12 years?

23 A: Yes.

24 Q: Did you hold your CDL license?

25 A: Yes.

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 Q: Did you ever get any awards as a truck driver?

2 A: I got a million. I got all kind of safety awards.

3 Q: You mentioned a million. What -- what is a million? You
4 said million. What is that?

5 A: It's a million miles safety award. That's driving a
6 million miles accident free.

7 Q: Have you ever backed into anyone or anything driving a
8 car?

9 A: No.

10 Q: Or a truck?

11 A: No.

12 Q: Let me ask you about the accident. So you mentioned
13 earlier that you know Mr. -- you know of Mr. Rocha, but you
14 hadn't talked to him before this?

15 A: Correct.

16 Q: And he -- he lived at 168 Rambo Drive; correct?

17 A: Yes.

18 Q: I'm going to hand you what we'll mark as Defendant's
19 Exhibit Number 1.

20 MR. HOWE: Just a moment, Your Honor. Can we approach
21 real quick?

22 THE COURT: Sure.

23 (WHEREUPON, a bench conference was held off the record,
24 after which the proceedings resumed as follows.)

25 THE COURT: Any objection to the exhibit?

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 MR. HOWE: No, Your Honor. We were just sorting it all
2 out.

3 THE COURT: All right. Very well. Defendant's Exhibit 1
4 is in evidence without objection.

5 (WHEREUPON, Defendant's Exhibit Number 1, map, was
6 admitted into evidence.)

7 BY MR. CRUDUP:

8 Q: So, in looking at that map -- hang on a second. In
9 looking at that map, do you see where your house is?

10 A: Yes.

11 THE COURT: Do you want to use the Elmo?

12 MR. CRUDUP: Oh, yeah.

13 BY MR. CRUDUP:

14 Q: It's not the best picture in the world, but in looking at
15 that picture, sir, do you see where your house is?

16 A: Yes.

17 Q: Is that that 170 --

18 A: 170 --

19 Q: -- West Steele here?

20 A: That's correct.

21 Q: All right. If you look, do you see that 168 Rambo, it's
22 kind of in the middle of that intersection? My understanding
23 is that that house is a little further over. Can you just
24 mark -- draw a circle kind of where that house would be?

25 A: Okay. It's right around there.

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 THE COURT: Hold on one -- I was going to say do we --
2 does this system have the -- the ability to draw on the --

3 THE CLERK: Yes.

4 THE COURT: Okay. He can draw on -- you want him to --

5 MR. CRUDUP: I'm going to use this.

6 THE COURT: Okay. It's okay. That's okay. Don't worry
7 about it.

8 BY MR. CRUDUP:

9 Q: So, Mr. Murdaugh, you just kind of drew a circle. I'll
10 put it right on top here, but that's a circle. That's about
11 where their house is; correct?

12 A: Correct.

13 Q: And does it accurately depict kind of where your houses
14 are now?

15 A: Yes.

16 Q: If Mr. Rocha would leave his house and made a left, kind
17 of where those dots are going, and then made a right and
18 another right, about how far would it be to get to in front of
19 your house?

20 A: About an eighth of a mile.

21 Q: I'm sorry? You said point eight miles or an eighth of a
22 mile?

23 A: About point eight miles, something like that.

24 Q: So by the time -- if that's the direction he took, by the
25 time he gets to your house, he would have walked close to a

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 mile; correct?

2 A: Correct.

3 Q: All right. So on the day of this accident, you said you
4 were going to get blood work. Were you in any hurry to do
5 that?

6 A: No, I leave early.

7 Q: Was anybody in the car with you?

8 A: No.

9 Q: You mentioned it wasn't light outside; correct?

10 A: That's right.

11 Q: I've talked about this. I want you to walk us through.
12 Tell the jury exactly what happened from the time you get in
13 that car until the time you stopped.

14 Q: I got in a car, rolled my windows down, and I started
15 backing out. When I got to the driveway, I stopped, I went to
16 back out, and I heard somebody hollering, and I looked and he
17 was sitting down over to my left, sitting in the middle of the
18 road.

19 Q: All right.

20 A: So I got out to check on him.

21 Q: Okay. So I've got a couple of questions for you about
22 that. About how fast are you backing up when you're backing
23 out of your driveway?

24 A: Probably just 2 or 3 miles an hour. I don't move very
25 fast.

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 said do you need 9-1-1? No, call my wife, and that's what I
2 did.

3 Q: And did you have a conversation with his wife when she
4 got there?

5 A: Just real quick. Just -- I can't remember exactly what
6 was said. It's been so long ago.

7 Q: And I think you might have alluded to this, but when he
8 leaves, how did he leave? Did he walk to a truck or
9 something?

10 A: Yes.

11 Q: Did he walk to that truck under his own power?

12 A: Yes. His -- his wife was holding his arm.

13 Q: And you talked about speaking with the Rochas after this.
14 Why did you give them your phone number?

15 A: Well, they got my phone number whenever I called her.

16 Q: In some way, did you tell her that you would walk with
17 him in the mornings?

18 A: Yes. I told her that I would walk with him, and I also
19 talked with him out there about two days later when he was
20 walking by there. If he would walk later, I would walk with
21 him because I needed to walk too. I mean, I didn't -- I
22 didn't think he needed to be out there walking by himself.

23 Q: Do you think you are responsible for his actions?

24 A: No, I do not.

25 Q: If you did hit Mr. Rocha with your car --

HAROLD MURDAUGH - CROSS BY MR. CRUDUP

1 A: No, I --

2 Q: -- what would you have done?

3 A: If I did hit him?

4 Q: Yes.

5 A: I would have called the police department and emergency
6 services and everything else if I hit him with the car.

7 Q: And I think you just mentioned this, but you've seen him
8 walking in the neighborhood since that time?

9 A: Yes, I have.

10 MR. CRUDUP: Those are all the questions I have. Thank
11 you.

12 THE COURT: Redirect?

13 MR. HOWE: Thank you, Your Honor.

14 THE COURT: And, Mr. Howe, I wanted to let you know that
15 in the event you need it, there's a laser pointer that you can
16 use if you need to use it on the monitor.

17 MR. HOWE: Thank you, Your Honor.

18 REDIRECT EXAMINATION

19 BY MR. HOWE:

20 Q: Mr. Murdaugh, you said you had a million miles in a big
21 old truck; right?

22 A: Yes.

23 Q: Is that a Mack truck?

24 A: Yes.

25 Q: What kind of truck were you driving on the day of this

LISA MURDAUGH – CROSS BY MR. CRUDUP

1 THE WITNESS: Thank you.

2 THE COURT: Cross-examination?

3 CROSS-EXAMINATION

4 BY MR. CRUDUP:

5 Q: Lisa, I just have a couple questions for you. When did
6 you guys get married?

7 A: I'll get him in trouble. 1980.

8 Q: Not 1979?

9 A: No, sir.

10 Q: Okay. Did you -- you knew him in 1979?

11 A: Yes, sir, I did.

12 Q: I assume you've driven in his car with Joey thousands of
13 times?

14 A: Yes.

15 Q: In those thousands of times, have you ever gotten in an
16 accident?

17 A: No.

18 Q: Has he ever driven in any fashion that makes you think
19 he's not a safe driver?

20 A: Not at all.

21 Q: And I assume you've been in the car many times when he's
22 backing up; right?

23 A: Yes.

24 Q: Or was backing out of your house; right?

25 A: Yes.

LISA MURDAUGH – CROSS BY MR. CRUDUP

1 Q: Hundreds? Thousands?

2 A: Yes.

3 Q: Has he ever backed into anything backing up?

4 A: No.

5 Q: When he's backing up, how fast does he usually back up?

6 A: Cautiously and appropriate for the circumstances.

7 Q: When he gets to the end of your driveway, does he ever
8 not stop? Does he ever just keep going?

9 A: No. We have to stop.

10 Q: Have you ever seen him back into anything ever?

11 A: No.

12 Q: Do you believe your husband is a safe driver?

13 A: I do.

14 Q: Has he ever told you that he ran over Mr. Rocha?

15 A: No.

16 Q: Has he ever told you that he hurt Mr. Rocha?

17 A: No.

18 Q: Has he ever told you anything but he found a guy sitting
19 in the street?

20 A: Correct. Yes, sir.

21 MR. CRUDUP: Those are all the questions I have.

22 THE COURT: Redirect?

23 REDIRECT EXAMINATION

24 BY MR. HOWE:

25 Q: Lisa, do people who are safe make mistakes sometimes?

1 A: Yes.

2 Q: Is that why we call it an accident because it wasn't on
3 purpose?

4 A: Yes.

5 MR. HOWE: That's all I have. Thank you.

6 THE COURT: Very well. Any recross?

7 MR. CRUDUP: No, Judge.

8 THE COURT: Call your next witness, please.

9 MR. HOWE: Yes, Your Honor. The plaintiff calls Emma
10 Murdaugh. All right. Rachel Emma. I'm not sure which one
11 she goes by.

12 (WHEREUPON, the witness was duly sworn by the clerk.)

13 THE COURT: And when you are seated, I'm going to ask you
14 a question. I'm going to ask you to state your full name for
15 our court reporter.

16 THE WITNESS: All right. Rachel Emma Murdaugh.

17 THE COURT: Rachel, that's good volume.

18 Your witness.

19 And that is a fresh cup of water right there.

20 THE WITNESS: Thank you so much.

21 RACHEL EMMA MURDAUGH, being

22 first duly sworn, testified as follows:

23 DIRECT EXAMINATION

24 BY MR. HOWE:

25 Q: Is it Rachel?

1 A: I go by Emma.

2 Q: Emma, now the last time we spoke, you told me you were
3 going to graduate in the summer?

4 A: That's right.

5 Q: Did you graduate?

6 A: I did.

7 Q: How old are you?

8 A: I'm 17.

9 Q: So early graduation. Where are you now?

10 A: I'm at Trident Technical College.

11 Q: What are you studying?

12 A: I'm trying to decide. I kind of changed it up.

13 Q: That's fair. Now, I'm going to keep it brief. I don't
14 want to keep you here longer than we have to. Okay?

15 A: Okay.

16 Q: Now, are you familiar with this case?

17 A: A little bit. Not really though.

18 Q: Can you tell me what you recall about the morning of this
19 accident?

20 A: I don't recall much at all. I just remember going
21 outside and seeing my dad helping somebody.

22 Q: Do you recall about what time it happened?

23 A: Not really. I was about 12 or 13 years old. I can't
24 remember much about it.

25 Q: Do you recall what you were doing prior to the accident

1 with the car?

2 A: I don't remember.

3 Q: Would seeing a copy of your deposition when we discussed
4 all these things help refresh your memory?

5 A: Not much because during that I do remember I still did
6 not remember much at all, but I did feel a little pressure to
7 say more than I kind of had to just try to remember, but I
8 don't have any memory of this day.

9 MR. HOWE: Your Honor, I would ask to unseal her
10 deposition to talk about what was going on that day.

11 THE COURT: Very well.

12 MR. HOWE: Thank you, Your Honor.

13 BY MR. HOWE:

14 Q: Emma, before I give you this, do people make mistakes
15 sometimes?

16 MR. HOWE: Can we mark this Court's Number 2?

17 (WHEREUPON, the deposition transcript of Rachel Emma
18 Murdaugh was marked and admitted as Court's Exhibit
19 Number 2.)

20 BY MR. HOWE:

21 Q: Do people sometimes make mistakes? It doesn't mean
22 they're bad people, does it?

23 A: Right.

24 Q: I would ask that you and I look at --

25 A: This is for me to grab?

1 Q: Yes, ma'am. I'm sorry. Okay. I've got a highlighted
2 copy. I'm going to ask you some background questions while I
3 look for the spot. Where do you live now?
4 A: I live at 170 West Steele Drive.
5 Q: Were you living there at the time of this accident?
6 A: I was.
7 Q: What grade were you in at the time of this accident?
8 A: I could have been in, like, seventh, eighth grade, maybe.
9 I don't know.
10 Q: And here we go. Let's see. Could you look at page 12
11 with me?
12 A: Yeah, of course.
13 Q: Could you read page 12? How about I read it to you and
14 you tell me if I'm reading it right? Is that okay?
15 A: All right. That's fine.
16 Q: At the time, you were -- this is the question.
17 At the time, you were 13. So you were taking the bus to
18 school? You said no.
19 How were you getting to school? You said sometimes my
20 dad would take me, but that morning my friend was coming to
21 pick you up.
22 Do you recall now that your friend was coming to pick you
23 up that morning?
24 A: I do remember that. I think so.
25 Q: And if you look a little further down page 12 on line 15,

1 the question is, what time would you generally leave the
2 school? You said it's hard to remember. I think we started
3 around eight, so I probably had to -- so I had to leave
4 probably around seven something maybe.

5 Does that -- is that accurate?

6 A: That would be accurate.

7 Q: So to circle back to what was originally asked, on that
8 morning were you waiting for your friend to come and pick you
9 up?

10 A: I was.

11 Q: And was that friend Gabby?

12 A: That was her name.

13 Q: And you don't recall her last name?

14 A: I don't. I didn't know her very long.

15 Q: And what time did Gabby generally come to pick you up?

16 A: It would have been around seven, I guess.

17 Q: Okay. So what were you doing -- excuse me. When did you
18 first become aware that something was happening outside of
19 your house?

20 A: From my window I can see, like, over towards there. Maybe
21 I saw that my dad's car just stopped right there and went out
22 to check. I don't remember exactly.

23 Q: Okay. What did you do after you noticed something going
24 on outside?

25 A: I probably went to -- I would always do that. I've

1 always got to see what's going on and if I see, you know,
2 anything that doesn't look right.

3 Q: Do you recall what was going on when you arrived at your
4 daddy's car?

5 A: Just the man was in the road.

6 Q: Do you recall where he was in the road?

7 A: Not exactly. It's very like blank memory for me.

8 Q: Do you recall at your deposition you drew a map for me?

9 A: I do remember that.

10 Q: And is this -- wait a minute. Is this the map that you
11 remember drawing?

12 A: It is.

13 Q: And this is marked as Plaintiff's Exhibit Number 1 from
14 your deposition; right?

15 A: Right.

16 Q: You drew this?

17 A: Right. But it's also not very accurate because I tried
18 not to draw the map, but I felt kind of pressured to because I
19 said multiple times I did not remember anything about that
20 day.

21 Q: Would you like to take a -- let's talk about the map for
22 a minute.

23 A: Okay.

24 Q: And then we'll address that. You drew this map?

25 A: I did.

1 Q: Do you remember in your deposition that you were sworn
2 under oath to tell the truth?

3 A: Yes.

4 Q: Just like you are here today?

5 A: Yes.

6 Q: Do you recall telling me about other matters in your
7 deposition that you did not remember?

8 A: Can you ask that again?

9 Q: Do you remember me telling you -- or excuse me. Do you
10 remember telling me at your deposition that you didn't
11 remember certain things?

12 A: I do.

13 Q: Do you remember me telling you that "I don't remember" is
14 an okay answer?

15 A: You could have. I don't recall that.

16 Q: All that said, you drew this map for me at your
17 deposition --

18 A: Yes.

19 Q: -- on what happened for the scene as you remembered it
20 when you arrived?

21 A: Yes.

22 Q: And do you recall we talked about in the law, we use this
23 little triangle -- right? -- to represent the defendant, and
24 you drew that, didn't you?

25 A: Yes.

1 every driver of a vehicle shall exercise due care to avoid
2 colliding with any pedestrian?
3 A: I do.
4 Q: Who taught you how to drive?
5 A: My father did.
6 Q: Do you have a brother who's a driving instructor?
7 A: I have a brother-in-law who is.
8 Q: Okay. And did he help you at all?
9 A: He did.
10 Q: You talked to him about it?
11 A: Yeah. He helped me out a couple of times.
12 Q: And as part of learning how to drive -- I'm not going to
13 go there. I apologize. How long have you lived at 170 West
14 Steele Drive?
15 A: My whole life.
16 Q: And what car do you drive right now?
17 A: The Chevy Malibu.
18 Q: Is it a Malibu or an Impala?
19 A: It's a -- it's a Malibu.
20 Q: I apologize.
21 A: It's okay.
22 Q: My mistake. I should have known that. That's your
23 primary car?
24 A: Yes.
25 Q: All right. And you drive that pretty often?

MARIA ROCHA – DIRECT BY MR. HOWE

1 and stuff because, like, it's really we have, like, strong --
2 just protecting my baby. I don't know. It's a culture thing.

3 Q: I guess I never heard of that. What does your husband
4 do?

5 A: He's in masonry, construction. Yes. He's self-employed.

6 Q: What do you do?

7 A: I'm a home school -- I home school my kids, so I'm a
8 stay-at-home mom. I went to college, but I decided I wanted
9 to invest my time in my children.

10 Q: You caught me in a daze for a second. I came home
11 yesterday, and my daughter was -- hit my wife with a hammer.
12 I was trying to imagine you doing four of those at once. How
13 did you first become aware of your father's accident?

14 A: So I had -- it was October 5. I remember it was October
15 5 because one of my baby's birthday -- which she's not a baby,
16 but one of my baby's birthday, so I had to call my mom to let
17 them know to go over to my house to have dinner, and she told
18 me about the accident. I was like, what? Is my dad okay?
19 Like, is he okay? And she's like, well, he's taking a nap
20 right now. I gave him ibuprofen.

21 And so when they got home for the dinner for my baby's
22 birthday, I'm, like, dad, what happened? So he -- like, he
23 told me all, like, what happened. I was, like, let me check
24 you, and he had, like, bruises, like, scratches on his legs.
25 I'm like, dad, like, what do you mean? Like, you have

1 bruises. Like, you need to go -- you need to go to the
2 doctor.

3 And my -- my younger sister was there, and I told her
4 that I'm -- like, I can't take him because I have all these
5 kids. So I'm, like, can you please take him to the ER? Like,
6 you can't just leave him like that. So then that's when they
7 took him to the ER

8 Q: And when you talked to your mom on the phone and she
9 first told you about what happened, do you recall what it was
10 that she said?

11 A: She -- like, she told me, like, that's what my dad told
12 her, that he was walking his normal walk. My dad -- I don't
13 know if you noticed him. He takes his --

14 THE COURT: Yes?

15 MR. CRUDUP: I believe this is hearsay within hearsay.

16 THE COURT: Sustained.

17 THE WITNESS: Okay.

18 BY MR. HOWE:

19 Q: What was your understanding of what happened at that
20 time?

21 A: That someone hit him with a car.

22 Q: And did you tell your father to go to the emergency room
23 to seek medical treatment because you were worried about him?

24 A: Yes. Sorry. Is that -- it's also a cultural thing.
25 Hispanics don't like to go to the emergency room because

1 that's where people die, but I'm, like, you need to go get
2 checked. So I -- I pressured him to go get checked.

3 Q: And did your father seek -- what -- do you recall how
4 much treatment your father sought as a result of this
5 accident?

6 A: It was just that, that visit.

7 Q: Did you -- did you contact the defendant after the
8 accident?

9 A: Yeah. I sent him a text message because my mom doesn't
10 speak proper English. So I'm, like, well, let me text it for
11 you.

12 Q: So you sent the text messages from your mother's phone?

13 A: Yes.

14 Q: And when was that?

15 A: When -- I don't remember, to be honest. I don't know if
16 it -- it was, like, hey, we're going to send my dad to the ER
17 or whenever we sent him, like, hey, we just got the bill.

18 Like, we assumed he was going to take care of it because he
19 seemed like he was, like, I'm -- like, oh, I don't know how
20 you say it. Like, he felt bad about it, so we thought he was
21 like an honest person. He was, like, oh, I'll handle it.

22 Like, I'll handle whatever, like, needs to be handled.

23 MR. HOWE: Can you turn on the Elmo for me? I want to
24 make sure these are in the right order.

25 BY MR. HOWE:

1 safe in his neighborhood?

2 A: He doesn't. After that, he was very determined to go
3 back to Mexico because he feels safer in his little town in
4 Mexico.

5 Q: And that town in Mexico, is that a small town?

6 A: It is.

7 Q: Are they dirt roads?

8 A: There's dirt roads, but also there's, like, paved.

9 Q: Are there very many cars?

10 A: Compared to Summerville, there's less cars.

11 Q: Does -- does his brother live nearby?

12 A: Yes.

13 Q: Before this accident, do you know if your mother and
14 father ever had any plans to return to Mexico?

15 A: Just like any American immigrant, Mexican immigrant, they
16 didn't want to go back, but they always say, we ain't going
17 back. We have too many grandkids.

18 Q: They wanted to live here?

19 A: Yes.

20 Q: Now, you talked to us a little bit before lunch about
21 your father coming over to your house the day of the accident?

22 A: Yes.

23 Q: Can you describe in a little bit better detail to me what
24 you saw, the bruising and scrapes on his body?

25 A: Yeah. So he got there, and I was, like, cooking dinner.

1 So he sat down and I was, like, dad, so what happened when I
2 was serving him dinner, and he's like, yeah, well, some guy
3 hit me, but I'm kind of bruised up, but I don't want to make a
4 big deal about it. I'm, like, well, let me check you. I'm,
5 like, are you sure? He's like, yeah, I mean I kind of ache.
6 I couldn't take a nap, but I was kind of in pain.

7 So I pulled up his shirt and checking was on this -- on
8 his right side, he had bruises. Dad is kind of dark. So when
9 I noticed the bruises, I was, like, dad. We joke a lot about
10 it. I'm, like, dad, you're kind of dark. I can see your
11 bruises. I'm, like, let me see your legs, and he had -- like,
12 his knees were scraped up. I'm, like, I don't want to be
13 overdramatic, but you -- like, if you have bleeding inside,
14 maybe you look kind of okay on the outside, but if you have
15 bruising, that means you got hurt inside. Like, I think you
16 should just get checked just to make sure everything's all
17 right.

18 Q: Your concern was the bruising was so bad, you really felt
19 like somebody needed to look at it?

20 A: Yes.

21 Q: And do you know -- and your sister took him to the
22 hospital? Is that what you said?

23 A: Yes. My younger sister.

24 Q: Which sister?

25 A: Adriana.

1 Q: And did you talk to your father after he came back from
2 the hospital?

3 A: Yes.

4 Q: Did your father incur medical bills at the hospital?

5 A: Yes.

6 Q: Now, almost back to where we were. After the accident,
7 did you help your mother contact or communicate with the
8 defendant?

9 A: Yes.

10 Q: How did you do that?

11 A: I texted him.

12 Q: How did you have his phone number?

13 A: I think it was that he had his call, like, whenever, he
14 called my mom to pick up my dad. I helped her save his number
15 that night when they went to my house.

16 Q: How soon after the accident did you send those text
17 messages?

18 A: Like, two days.

19 Q: And you typed --

20 A: No, no. I'm sorry. That night. That night, whenever he
21 went to the ER, we let him know that, hey, we are going to end
22 up taking him to the ER, just to keep them on the loop because
23 I think that's the right thing because in my mind, I'm, like,
24 hey, you know, like, there might be bills coming up, like,
25 we're already taking him to the ER.

1 MR. HOWE: 4, I believe.

2 (WHEREUPON, Plaintiff's Exhibit Number 4, medical bills
3 and records, was admitted into evidence.)

4 (WHEREUPON, there was a pause in the proceedings as the
5 interpreter provided translation to the plaintiff.)

6 THE COURT: Thank you.

7 THE INTERPRETER: Yeah.

8 THE COURT: And with regards to the exhibit.

9 THE INTERPRETER: Oh.

10 (WHEREUPON, there was a pause in the proceedings as the
11 interpreter provided translation to the plaintiff.)

12 ALFREDO ROCHA, being first duly
13 sworn, testified as follows via interpreter:

14 DIRECT EXAMINATION

15 BY MR. HOWE:

16 Q: Good morning, Alfredo. How are you doing?

17 A: Fine.

18 Q: Now, Alfredo, we just heard from Mr. Crudup a little bit
19 about this case. It was said that you have alleged that you
20 were ran over?

21 A: Yes.

22 Q: Being run over is pretty broad. Could you tell us in
23 detail a little bit more about the collision?

24 A: Yes.

25 Q: Please do.

1 A: This day -- that day I was walking along. I went in
2 front of the house of this man. When I was in his -- by his
3 driveway, I saw him. He was getting in his car. I -- I
4 walked about ten minutes, and then he -- he hit me.

5 Q: Okay. So you were by his driveway?

6 A: Yes.

7 Q: Could we clarify what he means by ten minutes?

8 A: No. I didn't say ten minutes.

9 Q: Okay. So you were walking by his driveway and you saw
10 his car and then what happened?

11 A: I didn't look back. I just kept walking, and all of a
12 sudden I felt something hit me.

13 Q: Where did you feel the impact?

14 A: In my back.

15 Q: Alfredo, I'm going to hand you Plaintiff's Exhibit Number
16 4, and I'm going to read you from the medical records.

17 Alfredo, did you go to Trident Hospital after the -- after the
18 accident?

19 A: Yes.

20 Q: And you were seen by doctors and nurses?

21 A: Yes.

22 Q: Did you talk to them about what happened to you?

23 A: Yes.

24 Q: Did you tell them that around 7:30 this morning, a
25 vehicle was backing up and hit you in the backside and you

ALFREDO ROCHA – CROSS BY MR. CRUDUP

1 THE COURT: Sure.

2 All right. Cross-examination?

3 CROSS-EXAMINATION

4 BY MR. CRUDUP:

5 Q: Good afternoon, Mr. Rocha. I'm going to try and actually
6 speak into this thing. I want to take you back to well before
7 this accident. Okay? Now, you were involved in a very
8 serious accident about seven or eight years before this
9 accident; correct?

10 A: Yes.

11 Q: And in that accident, you were actually riding a horse
12 when your horse was hit by a car; correct?

13 A: Yes.

14 Q: Okay. So from here on out, I'm going to refer to that
15 accident as the horse accident.

16 A: Yes.

17 Q: Okay. The horse accident left you with some significant
18 physical and mental limitations; is that fair?

19 A: No.

20 Q: Okay. So you are disputing that that accident left you
21 with significant physical limitations?

22 A: Yes.

23 Q: Okay. And it also left you with some mental issues; is
24 that fair?

25 THE INTERPRETER: Excuse me one second. It's been a long

ALFREDO ROCHA – CROSS BY MR. CRUDUP

1 resumed as follows.)

2 MR. CRUDUP: No, Your Honor.

3 THE COURT: Thank you.

4 (WHEREUPON, the jury entered the courtroom at 3:46 p.m.)

5 THE COURT: All right. Ladies and gentlemen, at this
6 time, we will continue with the plaintiff's case and cross-
7 examination.

8 MR. CRUDUP: Thank you.

9 THE COURT: Yes, sir.

10 BY MR. CRUDUP:

11 Q: Mr. Rocha, I'm just going to kind of walk us back and
12 kind of start a little bit from the beginning. So we talked
13 about you being involved in an accident where you were riding
14 a horse and you were knocked off that horse; correct?

15 A: Yes.

16 Q: And that accident left you with significant physical and
17 mental limitations?

18 A: Well, yes.

19 Q: Okay. So let's talk about those. First, it left you
20 partly blinded; correct?

21 A: A what?

22 Q: It left you blind in one eye; correct?

23 A: Yes.

24 Q: And --

25 A: But that was ten years ago.

1 by a lawyer about what happened?

2 A: I don't remember.

3 Q: Okay. I'll represent to you that about a year ago, you
4 were asked questions under oath about what happened in this
5 accident, and you swore to tell the truth. Do you have any
6 reason to disagree with that?

7 A: I don't remember.

8 Q: Okay. So --

9 THE COURT: Let me see the Court's exhibit, please.

10 MR. CRUDUP: Sure.

11 THE COURT: Counsel, let me see you, please.

12 (WHEREUPON, a bench conference was held off the record,
13 after which the proceedings resumed as follows.)

14 THE COURT: Ladies and gentlemen, I'm going to ask you to
15 please step to your jury room. Do not discuss this matter or
16 allow anyone to discuss it with you, and we will be with you
17 shortly.

18 (WHEREUPON, the jury exited the courtroom at 3:55 p.m.)

19 THE COURT: All right. Counsel, as I mentioned to you at
20 the sidebar, I cannot allow this jury to be misled. I'm not
21 going to allow this jury to be misled.

22 My concern is that the witness answered questions from
23 the deposition when you asked them, Mr. Howe, and now he has
24 no memory of having his deposition taken. I cannot allow
25 that.

ALFREDO ROCHA – CROSS BY MR. CRUDUP

1 Q: Sir, I'm going to read you a question starting on line
2 14, and then I'm going to read you your answer, which lines --
3 which ends on line 17. Okay?

4 A: Yes.

5 Q: Question.

6 A: Yes.

7 Q: Question: And what was the nature of the injury?

8 Answer: This. I was blinded and deaf in this side and I
9 had a fracture in my foot, and I had some kind of brain injury
10 in my head.

11 Now, do you remember saying that under oath?

12 A: Yes.

13 Q: Okay. So we can agree that you did suffer a brain injury
14 from that accident; right?

15 A: Yes.

16 Q: Okay. And it also caused you -- the brain injury caused
17 you mental problems like short- and long-term memory; correct?

18 A: Yes.

19 Q: And over time that improved some, but not too much;
20 right?

21 A: Yes.

22 Q: All right. And the accident was significant enough that
23 doctors prescribed you a wheelchair. Do you recall that?

24 A: Yes.

25 Q: And they also prescribed you a walking cane?

1 A: Yes.

2 Q: All right. And they told you that this was so
3 significant that you might never walk again, that you might be
4 in, I think, what you called a vegetable state for the rest of
5 your life; correct?

6 MR. HOWE: Objection, Your Honor. There's no basis for
7 that diagnosis. There's no records or any record of what he's
8 saying.

9 MR. CRUDUP: I'm -- Your Honor, there is a basis for it.
10 I'm going to -- he told me that.

11 THE COURT: Overruled. You may proceed.

12 MR. CRUDUP: Do you want me to re-ask?

13 THE COURT: You -- why don't you start again and ask the
14 question?

15 THE INTERPRETER: Thank you, Your Honor.

16 MR. CRUDUP: Sure.

17 BY MR. CRUDUP:

18 Q: Doctors told you that you might never be able to walk
19 again, and that you might be in a -- be like a vegetable for
20 the rest of your life?

21 A: Yes.

22 Q: Okay. And initially, you were completely bedridden;
23 right?

24 A: Yes.

25 Q: But eventually you were able to start to walk around

1 some; correct?

2 A: Yes.

3 Q: And you could walk around with the help of a cane like
4 the one you have today?

5 A: Yes.

6 Q: And since that time, you've always used your cane to walk
7 around and ambulate -- sorry -- to walk around?

8 A: Well, yes.

9 Q: And the reason you needed that cane was because you have
10 trouble balancing and walking; correct?

11 A: Yes.

12 Q: Now, you testified a little while ago that you had never
13 fallen after the horse accident. You never had any falls. Do
14 you remember that?

15 A: Yes.

16 Q: But when I asked you under oath last year, you told me
17 about several falls that you had. Do you remember those?

18 A: I don't remember.

19 Q: Okay. I want you to turn to page 19 of your deposition?
20 All right? And I'm going to read from lines 7 to 12.

21 Question: As part of the injury you suffered, the brain
22 injury, have you had falls of any kind or injuries since that
23 may have been due to being disoriented?

24 And the -- your answer was: I've fallen when walking
25 about two times.

1 way you walked?

2 BY MR. CRUDUP:

3 Q: The way you walked around to Mr. Murdaugh's house?

4 A: I don't understand.

5 MR. CRUDUP: Give him the exhibit to look at.

6 BY MR. CRUDUP:

7 Q: You would agree with me, sir, that if you are walking a
8 little further from home than you normally are and it's dark
9 out, it's easy for you to become disoriented; is that fair?

10 A: Yes.

11 Q: And you'd agree with me that if you were disoriented and
12 outside of that little area around your house in the dark, it
13 might be hard for you to see where the -- where the ground is
14 uneven; correct?

15 A: Yes.

16 Q: So that's the kind of thing in that situation it's not
17 hard to imagine you could fall from stepping in a hole or
18 stepping in uneven pavement; right?

19 MR. HOWE: Objection, Your Honor. Calls for speculation.

20 THE COURT: Overruled.

21 BY MR. CRUDUP:

22 Q: In that situation, sir, you'd agree with me that it'd be
23 easy for you to step into either a hole or rough pavement that
24 could cause you to lose your balance; right?

25 A: That's why I never walk at night.

ALFREDO ROCHA – CROSS BY MR. CRUDUP

1 Q: Right. So if it's dark outside, you don't want to be
2 walking around because it's very hard to see what's on the
3 ground; right?

4 A: Yes.

5 Q: Okay. Now, eventually you told us that you think this
6 accident -- the incident happened about ten feet past Mr.
7 Murdaugh's driveway; correct?

8 A: Yes.

9 Q: All right. And you also told us that you were about 3 to
10 4 feet off the road. So the pavement ends, then there's dirt,
11 and then there's that ditch. You were between those two;
12 correct?

13 MR. CRUDUP: Do you want me to break that down?

14 THE INTERPRETER: I need you to clarify that, please.

15 MR. CRUDUP: Sure.

16 BY MR. CRUDUP:

17 Q: Let me ask you this. So we agree there's a paved part of
18 the road; correct?

19 A: Yes.

20 Q: Then there's 4 or 5 feet of grass and dirt to the side of
21 that pavement?

22 A: Yes.

23 Q: And then there's the drainage ditch that kind of dips
24 into the ground?

25 A: Yes.

1 usually go out to the corner and take a left and another left;
2 correct? And then you keep making lefts around the block;
3 right?

4 A: Yes.

5 Q: But on that day, you didn't do that. You did the
6 opposite; right?

7 A: Yes.

8 Q: And that's why you walked more that day than you usually
9 do; right?

10 A: Yes.

11 Q: All right. And just to be clear, you have been living in
12 the U.S. now for the last year; right?

13 A: Yes.

14 Q: And you never walk in the dark because it's dangerous to
15 do that; right?

16 A: Yes.

17 Q: You can fall down or hurt yourself; right?

18 A: Yes.

19 MR. CRUDUP: Thank you. Those are all the questions I
20 have.

21 THE COURT: And thank you. Sir, you may come down and go
22 back to your seat.

23 THE PLAINTIFF: Thank you.

24 THE COURT: All right. Ladies and gentlemen, that's
25 going to conclude the work that we're going to do today.

GRACIELA ROCHA - CROSS BY MR. CRUDUP

1 THE COURT: From the defense?

2 MR. CRUDUP: No, Your Honor.

3 (WHEREUPON, the jury entered the courtroom at 11:02 a.m.)

4 THE COURT: All right. Ladies and gentlemen, at this
5 time, we will continue with the plaintiffs' case on the cross-
6 examination of Ms. Rocha.

7 MR. CRUDUP: Thank you, Your Honor.

8 THE COURT: Mr. Crudup.

9 CROSS-EXAMINATION

10 BY MR. CRUDUP:

11 Q: Good morning, Ms. Rocha.

12 A: Good morning.

13 Q: I have a few questions for you, and I'll kind of jump
14 around a little bit. Okay?

15 A: Okay.

16 Q: Now, you just testified that before this accident, your
17 husband never walked with a cane; correct?

18 A: No, he didn't walk with it.

19 Q: And after the accident with the horse, he never used any
20 assistive devices to walk either; correct?

21 A: He used the wheelchair because we decided he should use
22 it. We were afraid he might fall.

23 Q: Sure. So he used a wheelchair, but that was it; correct?

24 A: Exactly.

25 Q: Ms. Rocha, I'm going to hand you what we're going to mark

GRACIELA ROCHA - CROSS BY MR. CRUDUP

1 A: He walked better.

2 Q: I'm sorry. Maybe that was a confusing question. The way
3 we see him walking right now -- okay? -- that is a result of
4 his accident with the horse? It's not a result of the
5 accident with -- or we claim is an accident with Mr. Murdaugh;
6 right?

7 A: After the accident with the horse, he walked like that.

8 Q: Okay. And after the accident with the horse, he also
9 could not see well enough to go to work; correct?

10 A: Correct.

11 Q: In fact, because he couldn't see well enough and he
12 couldn't walk well enough, he was put on permanent disability;
13 correct?

14 A: Correct.

15 Q: And because of that combination of being able -- unable
16 to walk and see, he had significant balance issues as well;
17 right?

18 A: He couldn't drive. That's why he couldn't work.

19 Q: Okay. Do you agree that one of the reasons he couldn't
20 drive -- couldn't work was because he couldn't walk either?

21 A: No.

22 MR. CRUDUP: Your Honor, may I open her depo?

23 THE COURT: You may. And it'll be marked as a Court's
24 exhibit.

25 (WHEREUPON, the deposition of Graciela Rocha was marked

GRACIELA ROCHA - CROSS BY MR. CRUDUP

1 up because he was in so much pain, but back then, you said he
2 felt fine, he felt nothing at the time; right?

3 A: Correct, but I had to help him up. He didn't feel that
4 bad to have an ambulance.

5 Q: You said earlier he felt fine; right?

6 A: Well, yes, that's right.

7 Q: Okay. So which one is it? Was he hurt at the scene or
8 was he fine at the scene?

9 A: He wasn't well. He wasn't good.

10 Q: Okay. So then back then when we asked you that question,
11 you lied and said he was fine; right?

12 A: I did not lie. If I said mistaken words, that's
13 different.

14 Q: Okay. Now, when you got to the scene, you saw tire marks
15 on your husband's legs; correct?

16 A: That's right.

17 Q: Okay. And he told you that he was hit and the car kept
18 backing over him; correct?

19 A: Yes. My -- my husband said that he hit -- the car hit
20 his back and he fell and he felt the tires go onto his legs.

21 Q: Okay.

22 A: That's what he said.

23 Q: So, apparently, he said that the car ran over his legs;
24 right?

25 A: That's right. I wasn't there. I didn't see it. It's

DAMAGES SHEET

Alfredo Rocha

DOA: 10/05/2020

1. ACS Primary Care Physicians (10/5/20)	\$1,644.00
2. Trident Medical Center (10/5/20)	\$5,171.00
3. Charleston Radiologists (10/5/20)	\$40.69
TOTAL:	\$6,855.69



PO BOX 635003
CINCINNATI, OH 45263-5003

P
PATIENT STATEMENT

ACCOUNT NUMBER | STATEMENT DATE

84572119/29

05/12/23

84572119-29-29003

FOR PROPER POSTING
PLEASE WRITE IN CHECK
NUMBER AND AMOUNT PAID →

CHECK NUMBER | PAYMENT AMOUNT

PLEASE WRITE YOUR ACCOUNT NAME ON YOUR CHECK
MAKE PAYABLE IN U.S. DOLLARS TO:

ALFREDO ROCHA
168 RAMBO DRIVE
SUMMERVILLE SC 29483

ACS PRIMARY CARE PHYSICIANS -
PO BOX 635003
CINCINNATI, OH 45263-5003

PATIENT NAME: ALFREDO ROCHA

TO PAY BY CREDIT CARD COMPLETE
AND SIGN THE OTHER SIDE OF THIS STATEMENT

PHYSICIAN SERVICES RENDERED AT: SUMMERVILLE MEDICAL CENTER
PAYMENTS AND INSURANCE INFORMATION MAILED SEVEN DAYS
PRIOR TO THE ABOVE STATEMENT DATE MAY NOT YET APPEAR

TAXPAYER ID: 65-0691102

BILLING INQUIRIES: 888-952-6772

HOURS OF OPERATION: MONDAY - FRIDAY 8AM TO 7PM & SATURDAY 10AM TO 3PM ET
PROVIDE INSURANCE INFO OR PAY BY CREDIT CARD AT WWW.TEAMHEALTH.COM/BILLING

DATE / INVOICE #	DX / CPT CODE	DESCRIPTION	PROVIDER	CHARGES	PAYMENT CREDITS
10/05/20		99285 EMERGENCY DEPT VISIT - 99285		1644.00	
272991500	S83.92X		MCCARTHY MD, JORDAN / HOMER PA, KELLEN		
01/18/21		EDI AUTOMATIC EQUIAN PAYMENT			
272991500					

PHYSICIAN CHARGES ARE NOT INCLUDED IN THE FACILITY BILL

ACCOUNT NAME: 84572119/29

STATEMENT DATE: 05/12/23 (KRO)

TOTAL NOW DUE

▶ 1644.00

PATIENT NO:	66857434	TRIDENT MEDICAL CENTER	BILLING DATE	PAGE	1	00062
MED REC NO:	895969	9330 MEDICAL PLAZA DR	10/09/20			
GUARANTOR NO:						
PATIENT:	CHARLESTON		SC 294069104	ADMITTED		DISCHARGED
ROCHA ALFREDO				10/05/20		10/05/20

PAY TO ADDRESS: TRIDENT MEDICAL CENTER
PO BOX 402730
ATLANTA
GA 303842730

BILL TO:		
ROCHA ALFREDO	EMERGENCY	FC=99
	ADMIT THRU DISCHARGE CLAIM	

DATE OF	BATCH	F	NDC/CPT-4/				
SERVICE	REF	DEPT S	PROC	HCPCS	QTY	SERVICE DESCRIPTION	CHARGES
259-PHARMACY							
100520	05B065	0714	F 902192	904585561	1	IBUPROFEN 800MG TABLET	63.00
100520	05B065	0714	F 904558	68084071011	1	PERCOCET 10	126.00
						SUBTOTAL:	189.00
320-DX XRAY							
100520	06B158	0721	F 413689	71101RT	1	XR RIBS UNI W/CXR 3+V	674.00
100520	06B158	0721	F 413730	73030RT	1	XR SHOULDER 2 + V RT	845.00
100520	06B158	0721	F 413743	73080RT	1	XR ELBOW 3 + V RT	757.00
100520	06B158	0721	F 413792	73562LT	1	XR KNEE 3 V LT	934.00
						SUBTOTAL:	3210.00
450-EMERGENCY ROOM							
100520	08B940	0778	F 418661	99283	1	LVL 3 EMER DEPT	1414.00
						SUBTOTAL:	1414.00
636-DRUGS/DETAIL CODE							
100520	05B065	0714	F 902730	90714	1	TD VAC PF >=7YRS IM	229.00
						SUBTOTAL:	229.00
771-VACCINE ADMINISTRATION							
100520	08B940	0778	F 418634	90471	1	IMMUNIZ ADMIN SGL	129.00
						SUBTOTAL:	129.00
TOTAL ANCILLARY CHARGES						5171.00	

INSURANCE BENEFITS ASSIGNED TO TRIDENT HEALTH SYSTEM.

PATIENT NO:	66857434	TRIDENT MEDICAL CENTER	BILLING DATE	PAGE	2	00062
MED REC NO:	895969	9330 MEDICAL PLAZA DR	10/09/20			
GUARANTOR NO:						
PATIENT:		CHARLESTON	SC 294069104	ADMITTED		DISCHARGED
ROCHA ALFREDO				10/05/20		10/05/20

TOTAL CHARGES	5171.00
PAYMENTS	
ADJUSTMENTS	
BALANCE	5171.00

INSURANCE BENEFITS ASSIGNED TO TRIDENT HEALTH SYSTEM.

PATIENT NO:	66857434	TRIDENT MEDICAL CENTER	BILLING DATE	PAGE	3	00062
MED REC NO:	895969	9330 MEDICAL PLAZA DR	10/09/20			
GUARANTOR NO:						
PATIENT:	CHARLESTON		SC 294069104	ADMITTED	DISCHARGED	
ROCHA ALFREDO				10/05/20	10/05/20	

DEPARTMENTAL CHARGE SUMMARY		
DEPT	DESCRIPTION	AMOUNT
0714	SMC PHARMACY	418.00
0721	SMC MEDICAL IMAGING	3,210.00
0778	SMC EDU	1,543.00

REVENUE CHARGE SUMMARY				
REV CD	DESCRIPTION	BILLABLE	NON-BILLABLE	TOTAL
0259	PHARMACY	189.00	.00	189.00
0320	DX XRAY	3,210.00	.00	3,210.00
0450	EMERGENCY ROOM	1,414.00	.00	1,414.00
0636	DRUGS/DETAIL CODE	229.00	.00	229.00
0771	VACCINE ADMINISTRATION	129.00	.00	129.00

TOTAL CHARGES:	5,171.00
TOTAL PAYMENTS:	
TOTAL ADJUST:	

FS = SMC

Trident Health Systems - Summerville Medical Center
295 Midland Parkway , Summerville, South Carolina 29485 (843)832-5000

IN / OUT / ER PATIENT ADMISSION RECORD
ACCOUNT#: D00066857434 ADM DATE: 10/05/20 UNIT RCRD #: D000895969 ARRIVAL: WI
ROOM/BED: ADM TIME: 2129 MARKET URN: D986606 CONF: VIP:
PT. TYPE: DEP ER ADMIT PRI/SRC: EM / PR LOCATION(S): D.SED RC: 99

PATIENT INFORMATION
NAME: ROCHA, ALFREDO OTHER NAME:
STREET: DOB: SS#: XXX-XX-
STREET: AGE: 55 RACE: OTHER
C/S/ZP: SEX: M MAR STATUS: M
PHONE#: CNTY/RES: REL: LANG: SPANISH
PHONE2:
EMAIL:

SPOUSE / NOX / COMPANION
ROCHA, ABRIANA

PERSON TO NOTIFY

RELTN:

WORK PH:

GUARANTOR

ROCHA, ALFREDO

RELTN: SELF

OCCURRENCE CODES CONDITION CODES
01 10/05/20

INSURANCE INFORMATION

PHYSICIAN INFORMATION / DOCUMENTATION
ADM: PCP: NO PCP No Primary or Family Physician
HCS: HCS: 7943
ATT: REF: SELF SELF REFERRED
HCS: HCS: 9715
ER: MCCJO01 McCarthy, Jordan MD, 1596
REASON FOR VISIT/CHIEF COMPL: INJURY - ACCIDENT

COMMENTS:
PRT BY: R.HIM.KNP ON: 10/06/20 0104



ADVANCE DIRECTIVE:
DISCH DATE: 10/05/20 TIME: 2352 DISPO: HOM



Trident Health Systems - Summerville Medical Center
295 Midland Parkway , Summerville, South Carolina 29485 (843)832-5000

IN / OUT / ER PATIENT ADMISSION RECORD
ACCOUNT#: D00066857434 ADM DATE: 10/05/20 UNIT RCD #: D000895969 ARRIVAL: WI
ROOM/BED: ADM TIME: 2129 MARKET URN: D986606 CONF: VIP:
PT. TYPE: DEP ER ADMIT PRI/SRC: EM / PR LOCATION(S): D.SED FC: 99

PATIENT INFORMATION
NAME: ROCHA, ALFREDO OTHER NAME:
STREET: DOB: SS#: XXX-XX-
STREET: AGE: 55 RACE: OTHER
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PHONE#: CNTY/RES: REL: LANG: SPANISH
PHONE2:
EMAIL:

SPOUSE / NOK / COMPANION
ROCHA, ABRIANA

PERSON TO NOTIFY

RELTN: WORK PH:

RELTN: WORK PH:
GUARANTOR
ROCHA, ALFREDO

RELTN: SELF
OCCURRENCE CODES CONDITION CODES
01 10/05/20

PHYSICIAN INFORMATION / DOCUMENTATION
ADM: PCP: NO PCP No Primary or Family Physician
HCS: HCS: 7943
ATT: REF: SELF SELF REFERRED
HCS: HCS: 9715
ER: MCCJ001 McCarthy, Jordan MD, 1596
REASON FOR VISIT/CHIEF COMPL: INJURY - ACCIDENT

COMMENTS:
PRT BY: DNUR.DFW ON: 10/06/20 0146



ADVANCE DIRECTIVE:
DISCH DATE: 10/05/20 TIME: 2352 DISPO: HOM



RUN DATE: 10/13/20
RUN TIME: 1005
RUN USER: HPF.FEED

MEDITECH FACILITY: COCTR
IDEV - Discharge Report

PAGE 1

PATIENT: ROCHA, ALFREDO
ACCOUNT NO: D00066857434

A/S: 55 M
LOC: D.SED
RM:
BD:

ADMIT: 10/05/20
DISCH/DEP: 10/05/20
STATUS: ER
UNIT NO: D000895969

ATTEND DR: McCarthy, Jordan MD
REPORT STATUS: FINAL

Order Date: 10/05/20

—Service—

Category Procedure Name
MED.COCTR THS MEDICATIONS
Other Provider : HOMKE

Order Number Date Time Pri Qty Ord Source Status Ordered By
20201005-5343 10/05/20 2230 R E CMP MCCJ001

Sig Lvl Provider :

RX: 17675341

Start: 10/05/20 2230 ONE CMP
Stop: 10/05/20 2231

oxyCODONE/APAP Tab 10/325 (Percocet Tab 10/325)

Dose: 1 TAB

Route: PO

Direction: X1ED

Order's Audit Trail of Events

1	10/05/20 2214 DPA.KH	Order ENTER in EDM/POM
2	10/05/20 2214 DPA.KH	Ordering Doctor: McCarthy, Jordan MD
3	10/05/20 2214 DPA.KH	Order Source: EPOM
4	10/05/20 2214 DPA.KH	Other Doctor: Homer, Kellen PA
5	10/05/20 2214 DPA.KH	Signed by Homer, Kellen PA
6	10/05/20 2222 DNUR.AN	order acknowledged
7	10/05/20 2231 SCHEDULER	DISCONTINUE in PHA
8	10/05/20 1714 PHY.JM2	Signed by McCarthy, Jordan MD

Electronically signed by Homer, Kellen PA on 10/05/20 at 2214

Electronically signed by McCarthy, Jordan MD on 10/05/20 at 1714

Order Date: 10/05/20

—Service—

Category Procedure Name
MED.COCTR THS MEDICATIONS
Other Provider : HOMKE

Order Number Date Time Pri Qty Ord Source Status Ordered By
20201005-5344 10/05/20 2230 R E CMP MCCJ001

Sig Lvl Provider :

RX: 17675342

Start: 10/05/20 2230 ONE CMP
Stop: 10/05/20 2231

Ibuprofen Tab (Motrin Tab)

Dose: 800 MG

Route: PO

Direction: X1ED

Order's Audit Trail of Events

1	10/05/20 2214 DPA.KH	Order ENTER in EDM/POM
2	10/05/20 2214 DPA.KH	Ordering Doctor: McCarthy, Jordan MD
3	10/05/20 2214 DPA.KH	Order Source: EPOM
4	10/05/20 2214 DPA.KH	Other Doctor: Homer, Kellen PA
5	10/05/20 2214 DPA.KH	Signed by Homer, Kellen PA
6	10/05/20 2222 DNUR.AN	order acknowledged
7	10/05/20 2231 SCHEDULER	DISCONTINUE in PHA
8	10/05/20 1714 PHY.JM2	Signed by McCarthy, Jordan MD

Electronically signed by Homer, Kellen PA on 10/05/20 at 2214

Electronically signed by McCarthy, Jordan MD on 10/05/20 at 1714

PERMANENT MEDICAL RECORD COPY

RUN DATE: 10/09/20
RUN TIME: 0315
RUN USER: HPF.FEED

Trident Health System ABS *LIVE*
CODING SUMMARY

PAGE 1

NAME: ROCHA, ALFREDO

ACCT#: D00066857434
FORM:

ADM DATE: 10/05/20 2129
ATTEND PHYS: McCarthy, Jordan MD
DIS DT/TM: 10/05/20 2352
DIS DISP: ROUTINE HOME/SELF CARE
LOS: 1
PT CLASS: ER.ALL

UNIT#: D000895969
SEX: M
AGE: 55
DOB: 05/31/65
FIN CLASS: 99
ABS STATUS: FINAL

DIAGNOSES

POA INDICATOR CODESET

REASON FOR VISIT DX
M25.521

PAIN IN RIGHT ELBOW

ICD10

PRIMARY CODESET

PRINC DX	S43.401A	UNSPECIFIED SPRAIN OF RIGHT SHOULDER JOINT, INIT ENCOUNTER	ICD10
OTHER DX	S83.92XA	SPRAIN OF UNSPECIFIED SITE OF LEFT KNEE, INITIAL ENCOUNTER	ICD10
	S20.211A	CONTUSION OF RIGHT FRONT WALL OF THORAX, INITIAL ENCOUNTER	ICD10
	S50.01XA	CONTUSION OF RIGHT ELBOW, INITIAL ENCOUNTER	ICD10
	E78.5	HYPERLIPIDEMIA, UNSPECIFIED	ICD10
	E11.9	TYPE 2 DIABETES MELLITUS WITHOUT COMPLICATIONS	ICD10
	Z23	ENCOUNTER FOR IMMUNIZATION	ICD10
	V03.99XA	FED W CONVEY INJURED PICK-UP TRUCK, PK-UP/VAN, UNSP, INIT	ICD10
	Y93.01	ACTIVITY, WALKING, MARCHING AND HIKING	ICD10
	Y92.410	UNSP STREET AND HIGHWAY AS PLACE	ICD10

OTHER CODESET

PRINC DX
OTHER DX

PROCEDURE

PRIMARY CODESET

DATE PROC CODE & NAME

SURGEON

ANESTHESIOLOGIST

OTHER CODESET

PRIMARY CODESET

DRG I-10

OTHER CODESET

DRG I-9

STATUS	\$REIMB	MIN-LOS	STD-LOS	COST WT	GRP VERS	GRP FC
					36	99

DRG STATUS DATE:
CODER: INTERFACE

ABS STATUS DATE: 10/08/20
ABSTRACTOR: CACUSER

This form will be maintained as a permanent part of the medical record

TRIDENT HEALTH SYSTEMS (COCTR)
EMERGENCY PROVIDER REPORT
REPORT#:1005-1221 REPORT STATUS: Signed
DATE:10/05/20 TIME: 2304

PATIENT: ROCHA, ALFREDO
ACCOUNT#: D00066857434
AGE: 55 SEX: M
Family Physician
SERVICE DT: 10/05/20
REP SRV DT: 10/05/20
* ALL edits or amendments must be made on the electronic/computer document *

UNIT #: D000895969
ROOM/BED:
PCP PHYS: No Primary or
AUTHOR: Homer, Kellen PA
REP SRV TM:2304

HOMER, KELLEN 10/05/20 2304:
HPI-Trauma Minor/Fall

Presentation

Chief Complaint Fall

Hx Obtained From Patient, Daughter

Onset Occurred Today

Symptom Duration Since onset

Progression since Onset Unchanged

Caused by Motor vehicle collision

Location Chest (Right sided ribs), Upper extremity R, Lower extremity L

Quality Painful

Severity: Onset Mild

Severity: Current Moderate

Associated with

Reports: Chest pain (Right sided rib pain). Denies: Abdominal pain, Headache, Loss of consciousness, Nausea, Neck pain, Numb extremities, Pain on walking, Shortness of breath, Vision change, Vomiting.

Associated Other Pt denies other symptoms

Exacerbated by Deep breath, Palpation

Relieved by Nothing

Free Text HPI Notes

Free Text HPI Notes

55-year-old male with a past medical history of diabetes, hyperlipidemia presenting to the ER for evaluation of right shoulder, right elbow, right-sided chest wall, and left knee pain. Patient states that he was walking on the sidewalk. There was a car that was backing out of their driveway, which subsequently struck the patient. He fell landing on his right side. He denies hitting his head or loss of consciousness. He is not anticoagulated. He denies any headache, changes in his vision, nausea or vomiting. He denies any neck or back pain. He denies any flank pain, hematuria, pelvic pain. No treatments tried prior to arrival. Unsure of tetanus immunization. Denies any other injuries or complaints at this time.

Risk-Trauma Minor/Fall

Patient: ROCHA, ALFREDO
Unit#:D000895969
Date: 10/05/20
Acct#:D00066857434

Risk Stratification

Nexus C-Spine Criteria

No: Post midline tenderness, Intoxicated, Altered LOC/alertness, Focal neuro deficit pres, Distracting injury pres.

Review of Systems

Basic Review of Systems

Basic ROS CV: No chest pain, GI: No abd pain/vomiting, GU: No dysuria/frequency, HEM: No bleeding/bruising, PSYCH: NL thought content

Focused Review of Systems

Eyes

Denies: Blurred bilat, Visual loss bilat.

Respiratory

Denies: Shortness of breath.

Musculoskeletal

Reports: Joint pain. Denies: Back pain, Joint swelling, Neck pain, Thoracic pain.

Skin

Reports: Abrasion.

Neurologic

Denies: Bladder dysfunction, Bowel dysfunction, Headache, Vision change.

Past Medical History - Adult

Stated Complaint INJURY - ACCIDENT

Allergies

Coded Allergies:

No Known Drug Allergies (10/05/20)

Review of Nursing Notes Rev avail, and agree

Past Medical History:

Reports: Diabetes mellitus, Dyslipidemia.

Smoking status for patients 13 years old or older: Never Smoker

Physical Exam

Vital Signs

Vital Signs

First Documented:

	Result	Date Time
--	--------	-----------

Patient: ROCHA, ALFREDO
 Unit#:D000895969
 Date: 10/05/20
 Acct#:D00066857434

Pulse Ox	98	10/05 2132
B/P	156/85	10/05 2132
B/P Mean	108	10/05 2132
O2 Delivery	Room air	10/05 2132
Temp	36.9	10/05 2132
Pulse	107	10/05 2132
Resp	18	10/05 2132

Last Documented:

	Result	Date Time
Pulse Ox	97	10/06 0006
B/P	130/80	10/06 0006
B/P Mean	96	10/06 0006
O2 Delivery	Room air	10/06 0006
Temp	36.7	10/06 0006
Pulse	93	10/06 0006
Resp	16	10/06 0006

Review of Vital Signs Reviewed

Basic Physical Exam

Basic PE EYES: PERRL, conj clear, ENT: Membranes moist, RESP: No resp distress, CV: Reg rate & rhythm, ABD: Soft/non-tender, EXT: No gross abnormality, SKIN: No rashes, warm/dry, NEURO: alert & oriented, NEURO: gross movement NL, PSYCH: NL thought content

Focused PE

General/Const **

General/Const Awake, Alert, No acute distress, Not toxic appearing

MS Head **

Head Atraumatic

Text/Dict Notes

Negative Battle sign. Negative raccoon sign.

Eyes

Eyes Atraumatic, PERRL, EOMI, No nystagmus

Ears/Nose/Throat

Ears/Nose/Throat Atraumatic, Airway patent, Mucous membranes moist, Pharynx NL, No peritonsillar abscess, No pooling of secretions, No trismus, Tympanic membs NL, Ext aud canal NL, Mastoid area NL, Nose exam NL, No sinus tenderness, No facial swelling,

Gums/dentition NL

Text/Dict Notes

Patient: ROCHA, ALFREDO
Unit#:D000895969
Date: 10/05/20
Acct#:D00066857434

Negative for hemotympanum bilaterally. Negative for septal hematoma, active epistaxis, septal deviation. No dental injury.

MS Neck **

Neck Atraumatic, Full range of motion, No swelling, Non-tender, No midline vertebral tend

Resp/Chest

Respiratory/Chest Atraumatic, Breath sounds NL, Breath sounds = bilat, No respiratory distress

Text/Dict Notes

Tenderness to palpation along the right lateral rib musculature without any bony crepitance or step-off deformity.

Cardiovascular

Cardiovascular Heart rate NL, Regular rhythm, Heart sounds NL

Abdomen/GI

Abdomen/GI Atraumatic

MS Back

Back Atraumatic, Inspection NL, Full range of motion, Non-tender, No midline vertebral tend

MS Upper Extrem

Text/Dict Notes

Tenderness to palpation along the lateral aspect of the right shoulder, diffusely tender along the right elbow. Patient maintains full active range of motion at the right shoulder, elbow, wrist. Brisk capillary refill is noted. Strong radial pulse palpated. No deficits to the median, radial, ulnar nerve. Grip strength 5/5.

MS Lower Extrem

Text/Dict Notes

Mild tenderness to the lateral aspect of the left knee without bony crepitance or step-off deformity. Joints above and below are examined are within acceptable limits. Brisk capillary refill noted. Strong dorsalis pedis pulse palpated. Able wiggle all his toes without difficulty.

Skin

Text/Dict Notes

Abrasion noted to the posterior aspect of the right shoulder.

Neurologic

Neurologic Oriented X3, Speech NL, No motor deficits, No sensory deficits, CN II - XII intact, Reflexes equal bilat, Cerebellar NL, Memory NL, Gait NL

Interpretation & Diagnostics

Lab Results Interpretation

Results

Recent Impressions:

Patient: ROCHA, ALFREDO
Unit#:D000895969
Date: 10/05/20
Acct#:D00066857434

RADIOLOGY - KNEE COMPLETE (3 VIEWS) LEFT 10/05 2257

*** Report Impression - Status: SIGNED Entered: 10/05/2020 2324

IMPRESSION:

1. No acute findings.
2. Moderate tricompartmental osteoarthritis.

Impression By: PHY.BJM1 - Benjamin J. Mullenbach, MD

RADIOLOGY - ELBOW RIGHT - 3 VIEWS 10/05 2257

*** Report Impression - Status: SIGNED Entered: 10/05/2020 2322

IMPRESSION:

1. No acute findings.
2. Prominent olecranon enthesopathic change.

Impression By: PHY.BJM1 - Benjamin J. Mullenbach, MD

RADIOLOGY - SHOULDER COMPLETE, RIGHT 10/05 2257

*** Report Impression - Status: SIGNED Entered: 10/05/2020 2321

IMPRESSION:

No acute findings.

Impression By: PHY.BJM1 - Benjamin J. Mullenbach, MD

RADIOLOGY - RIBS UNI W/CXR 3 + VIEWS RT 10/05 2257

*** Report Impression - Status: SIGNED Entered: 10/05/2020 2320

IMPRESSION:

No displaced rib fractures identified.

Impression By: PHY.BJM1 - Benjamin J. Mullenbach, MD

Re-Evaluation & MDM

Patient: ROCHA, ALFREDO
Unit#:D000895969
Date: 10/05/20
Acct#:D00066857434

Free Text MDM Notes

Free Text MDM Notes

55-year-old male presenting to the emergency department for evaluation of right shoulder, right elbow, right-sided rib pain, left knee pain status post fall. Patient taken to the exam room, interviewed, examined. Patient with benign, reassuring, nonfocal neurologic exam. No signs of blunt trauma noted to the head, neck, chest, abdomen, or pelvis. Patient given pain medication here. Tetanus shot updated. X-ray of the right shoulder, right elbow, chest with right ribs, left knee obtained showing no acute abnormality. Patient and daughter updated on results. Discussed supportive care for home including rest, ice. Discussed with him the importance of taking good, strong, deep breaths to avoid developing pneumonia. Patient instructed on proper incentive spirometer use. Patient looked up in the PMP. Will place him on Norco with sedation warning signs in addition to Motrin. Will have him closely follow with Orthopedics as needed. Heart rate trended downward prior to discharge.

Questions have been invited in fully answered. I have instructed the patient to follow up with primary care provider within 1-2 days to ensure resolution of symptoms. The patient is being discharged from the emergency department in a stable, nontoxic, and improved condition. Patient is to return for worsening or persistence of symptoms or new concerns. I provided the patient with strict return precautions. Patient disposition completed in compliance with APC guidelines for supervision. The chart was designated for review and at the station by the supervising physician on duty.

Portions of this document were created using voice recognition and inadvertent, undetected areas and/or omissions may be present as a result. This document has been electronically signed however, not proofread.

ED Course

Medication(s) Ordered

Medication(s) Ordered:

Central Nervous System Agents

Medication	Dose	Sig/Sch Route	Start time Stop Time	Status	Last Admin
Ibuprofen	800 MG	XTED ONE PO	10/05 2230 10/05 2231	DC	10/05 2222
Oxycodone/ Acetaminophen	1 TAB	XTED ONE PO	10/05 2230 10/05 2231	DC	10/05 2222

Serums, Toxoids, And Vaccines

Medication	Dose	Sig/Sch Route	Start time Stop Time	Status	Last Admin
------------	------	------------------	-------------------------	--------	---------------

Patient: ROCHA, ALFREDO
 Unit#:D000895969
 Date: 10/05/20
 Acct#:D00066857434

Tetanus/Diphtheria	0.5 ML	X1ED ONE	10/05 2230	DC	10/05
Toxoids		IM	10/05 2231		2223

Patient Discharge & Departure

Vital Signs/Condition

Vital Signs

First Documented:

	Result	Date Time
Pulse Ox	98	10/05 2132
B/P	156/85	10/05 2132
B/P Mean	108	10/05 2132
O2 Delivery	Room air	10/05 2132
Temp	36.9	10/05 2132
Pulse	107	10/05 2132
Resp	18	10/05 2132

Last Documented:

	Result	Date Time
Pulse Ox	97	10/06 0006
B/P	130/80	10/06 0006
B/P Mean	96	10/06 0006
O2 Delivery	Room air	10/06 0006
Temp	36.7	10/06 0006
Pulse	93	10/06 0006
Resp	16	10/06 0006

All vital signs available at the time of this entry have been reviewed.

Condition Stable, Improved

Clinical Impression

Clinical Impression

Primary Impression: Contusion of rib on right side

Secondary Impressions: Contusion of right elbow, Left knee sprain, Sprain of right shoulder

Disposition Decision

Discharge

☒ (Discharged to Home Yes

☒ (Time 2334

Patient: ROCHA, ALFREDO
Unit#:D000895969
Date: 10/05/20
Acct#:D00066857434

(Date 10/05/20

**Discharge/Care Plan
Referrals**

No Primary or Family Physician (PCP)

MCCARTHY,JORDAN MD 10/06/20 1707:
HPI-Trauma Minor/Fall

General

Initial Greet Date/Time 10/05/20 2132

Patient Discharge & Departure

Discharge/Care Plan

(Auto) Prescriptions

Current Visit Scripts

HYDROcodone/APAP 7.5/325 MG (NORCO 7.5/325 MG) 1 TAB PO Q6H PRN PRN
SEVERE PAIN

HYDROcodone/APAP 7.5/325 MG (NORCO 7.5/325 MG) 1 TAB PO Q6H PRN PRN
SEVERE PAIN #12 TAB

IBUPROFEN (MOTRIN) 800 MG PO Q8H PRN PRN PAIN

IBUPROFEN (MOTRIN) 800 MG PO Q8H PRN PRN PAIN #15 TAB

Supervising Physician Note

MidLv Saw Pt Alone

I have reviewed the PA/NP's note and plan of care. I was available for consultation as needed at all times during the patient's visit in the emergency department. I agree with the clinical impression, plan and disposition.

Electronically Signed by Homer,Kellen PA on 10/05/20 at 2335

Electronically Signed by McCarthy,Jordan MD on 10/06/20 at 1709

Patient: ROCHA, ALFREDO
Unit#:D000895969
Date: 10/05/20
Acct#:D00066857434

RPT #: 1005-1221
END OF REPORT

Page 9 of 9

RUN DATE: 10/07/20
 RUN TIME: 0711
 RUN USER: HPF.FEED

Trident Health System EDM **LIVE**
 EMERGENCY PATIENT RECORD

PAGE 1

Patient: ROCHA, ALFREDO
 EDM Provider: McCarthy, Jordan MD, 2hcaActive

Age/Sex: 55/M

Acct No: D0006857434
 Unit No: D000685969

GENERAL DATA

ED Physician: McCarthy, Jordan MD, 2hcaActive
 Practitioner: HOMER, KELLEN, 2hcaPrvNoM
 Nurse: MARTIN, CHLOE, RN
 Arrival Date/Time: 10/05/20 - 2129
 Triage Date/Time: 10/05/20 - 2132
 Date of Birth: 05/31/1965

Stated Complaint: INJURY - ACCIDENT

Chief Complaint: Rib Pain

Priority: 3

Status/Event History:

10/05/20 2129 Reception
 2132 With Physician/Practitioner
 2153 Triage
 2202 Room
 2257 Ready For Radiology
 2335 Disposition - Depart
 2352 Departed
 10/06/20 0012 Off Tracker

MODE OF ARRIVAL

WALK IN

ALLERGIES

No Known Drug Allergies

ASSESSMENTS

10/05/20 2132 Rapid Assessment

KING, HAILEY, RN

- - RAPID INITIAL ASSESSMENT - -

First Point of Contact: Yes

Enter/Edit Allergies: Yes

Arrived by: MI

Medications/treatments prior to arrival: None

Subjective assessment:

PT C/O PAIN IN RIGHT SIDE OF RIBS. PT STATES AROUND 0730 THIS MORNING A VEHICLE WAS BACKING UP AND HIT PT IN THE BACKSIDE AND HE FELL FORWARD AND LANDED ON HIS RIGHT SIDE. DENIES LOC OR HITTING HIS HEAD. RIGHT SIDE OF RIBS IS SWOLLEN BUT NO BRUISING NOTED. 10/10 PAIN. NO MEDS PTA.

Objective assessment:

PT IS AFEBRILE, A&OX4, SWELLING NOTED TO RIGHT SIDE OF RIBS, RESP EVEN AND UNLABORED, NO DISTRESS NOTED

Onset of Symptoms Date: 10/05/20

Onset of Symptoms Time: 0730

Neuro WOP: Yes

Cardiovascular WOP: Yes

Respiratory WOP: Yes

Pain scale utilized: Verbal numeric

Pain intensity: 10

Smoking status for patients 13 years old or older: Never Smoker

Flowsheet: Yes

Chief Complaint: Rib Pain

Priority: ESI 3/URGENT

ESP? H

Facility ESP status:

ESP Enabled

- FIRST POINT OF CONTACT - -

Is patient present and able to complete the screening for infection: Yes

Have you ever had TB or a positive TB skin test: No

Recent close contact with a person who has influenza like illness or TB: No

Risk factors for C.diff: None

Have you or a close contact traveled outside the US in the last 3 weeks: No

Fever greater than 100.4 F or 38.0 C: Not in the last 7 days

Cough not related to allergy or COPD: Not in the last 7 days

Sore throat: Not in the last 7 days

Night sweats: Not in the last 7 days

Unexplained weight loss: Not in the last 7 days

Fatigue: Not in the last 7 days

Body aches: Not in the last 7 days

Rash: Not in the last 7 days

Nasal congestion unrelated to allergies/sinus infections: Not in the last 7 days

Patient states having a fever: No

Patient states having shortness of breath: No

COVID-19 point of entry screening status: Negative COVID-19 Risk

Recent oncology history: Not stated

Point of entry screening status:

Negative TB Risk

Negative Respiratory Risk

Negative C difficile Risk

Negative Oncology Risk

- PAIN DATA - -

Numeric pain scale: Severe/worst possible-10

- RAPID FLOWSHEET - -

- VITAL SIGNS - -

Temperature F: 98.5

Temperature source: Oral

Pulse: 107

Pulse source: Monitor

Respiratory rate: 18

Blood pressure: 156/85

Blood pressure source: Non-invasive monitor

Mean arterial pressure: 108

Vital signs position: Sitting

SPO2 %: 98

Oxygen delivery devices: Room air

- HEIGHT/WEIGHT - -

Height ft: 5

Height in: 4

Height source: Stated/Reported

Weight kg: 81.818

Weight source: Stated/Reported

BMI calculated: 31.0

- BILATERAL BLOOD PRESSURES - -

- SEVERE SEPSIS SCREENING - -

Temperature: No

Heart rate: Yes

Respirations: No

WBC results:

RUN DATE: 10/07/20
 RUN TIME: 0711
 RUN USER: HPF.FEED

Trident Health System EDM **LIVE**
 EMERGENCY PATIENT RECORD

PAGE 2

Patient: ROCHA, ALFREDO
 EDM Provider: McCarthy, Jordan MD, 2hcaActive

Age/Sex: 55/M

Acct No: D00066857434
 Unit No: D000895969

No results past 48 hrs
 Band results:
 No results past 48 hrs
 WBC/Bands: No
 If yes to 2 or more of above, proceed to next section: 1

10/05/20 2200 Severe Sepsis Screening
 -- SEVERE SEPSIS SCREENING --

MARTIN, CHLOE, RN

Temperature: No
 WBC results:
 No results past 48 hrs
 Heart rate: Yes
 Band results:
 No results past 48 hrs
 Respirations: No
 WBC/Bands: No
 If yes to 2 or more of above, proceed to next section: 1

10/05/20 2200 Physical Findings
 -- PHYSICAL FINDINGS --

MARTIN, CHLOE, RN

Neurological WDP: Yes
 Cardiovascular WDP: Yes
 Respiratory WDP: Yes
 Gastrointestinal WDP: Yes
 Genitourinary WDP: Yes
 Musculoskeletal WDP: No
 Musculoskeletal documented via chief complaint: Yes
 Integumentary WDP: Yes
 Vascular WDP: Yes
 Psychosocial WDP: Yes
 Eye WDP: Yes
 ENT WDP: Yes

10/05/20 2200 Medication History

MARTIN, CHLOE, RN

-- Admission Home Meds --
 Enter/Edit home med reconciliation: Yes
 Attention Required: No

10/05/20 2200 Pain Assessment/Reassessment

MARTIN, CHLOE, RN

-- PAIN ASSESSMENT --
 Pain scale utilized: Verbal numeric
 Pain intensity: 10
 Pain location: RIGHT RIBS
 Numeric pain scale: Severe/worst possible-10

10/05/20 2200 Rib Pain
 -- RIB PAIN --

MARTIN, CHLOE, RN

Mechanism of injury: Blunt trauma
 Presenting signs/symptoms: RIGHT RIB PAIN
 Initial onset of signs/symptoms: 8-10 hours ago
 Symptoms frequency: Constant
 Area of pain/injury: Anterior upper rib right, Posterior lower rib right,
 Posterior upper rib right, Anterior lower rib right
 Airway: Patent
 Respirations even and unlabored: Yes
 Cough: None
 Is skin warm and dry: Yes
 Color w/within expectations for ethnicity: Yes

Rib pain complications comment:
 NAD. PATIENT HIT BY CAR EARLIER TODAY AND C/O RIGHT RIB
 PAIN, DENIES OTHER S/S.

10/05/20 2200 Fall Risk Assessment

MARTIN, CHLOE, RN

-- FALL RISK ASSESSMENT --
 Able to comprehend and follow directions: Yes
 Is patient at high risk for falls: No
 Fall interventions in use: CALL BELL AND PERSONAL ITEMS, IN REACH
 Fall precautions observed: Yes

10/05/20 2200 Detailed Assessment

MARTIN, CHLOE, RN

-- DETAILED ASSESSMENT --
 Suicide screening: Yes
 Are you frequently being bullied: No
 Arrived by: W
 Medications/treatments prior to arrival: None
 Health history: Yes
 BMI calculated: 31.0
 Chief Complaint: Rib Pain
 Expected outcome of chief complaint: Stabilized/maintained
 Detailed assessment comments:
 NAD. ALERT AND ORIENTED. AMBULATORY. SKIN WARM AND DRY.
 SUPERFICIAL ABRASIONS TO RIGHT SHOULDER. NO ACTIVE BLEEDING
 RESPIRATIONS EVEN AND UNLABORED. AFEBRILE.
 -- HEALTH HISTORY --
 Hearing Impairment: None
 Vision Impairment: None
 -- DEVELOPMENTAL --
 Developmental level 18 years+: Able to function indepnt, Able to live independently

-- ASSISTIVE DEVICES --
 Assistive devices used: Cane

-- TOBACCO USE --
 Smoking status for patients 13 years old or older: Never Smoker

-- ABUSE/LIVING SITUATION --
 Do you feel safe at home, work and/or school/daycare: Yes
 Evidence of physical and/or psychological abuse: No
 Evidence of verbal abuse: No
 History consistent with presentation/injury: Yes
 Living situation: Home with others

-- SUICIDE ASSESSMENT --
 Wish to be dead or to not wake up in the past month: No
 Wish to be dead or to not wake up in your lifetime: No
 Non-specific active suicidal thoughts in the past month: No
 Non-specific active suicidal thoughts in your lifetime: No
 Attempted, plan to attempt, or prepared to end life in your lifetime: No
 Attempted, plan to attempt, or prepared to end life in the past 3 months: No
 Calculated suicide risk level:
 No risk

10/05/20 2300 Rib Pain Reassessment

MARTIN, CHLOE, RN

-- RIB PAIN REASSESSMENT --

RUN DATE: 10/07/20 RUN TIME: 0711 RUN USER: HPF.FEED		Trident Health System EDM **LIVE** EMERGENCY PATIENT RECORD		PAGE 3	
Patient: ROCHA, ALFREDO EDM Provider: McCarthy, Jordan ND, 2hcaActive		Age/Sex: 55/M		Acct No: D00066857434 Unit No: D000895069	
Patient condition assessment: No change 10/06/20 0000 Rib Pain Reassessment - - RTB PAIN REASSESSMENT - - Patient condition assessment: Improved Rib pain reassessment complications comment: currently denies any pain.		MARTIN, CHLOE, RN		Pain scale utilized: Verbal numeric - NUMERIC PAIN SCALE - - Numeric pain scale: No pain-0 - PATIENT/FAMILY TEACHING - - Primary learner: Patient Other learner: Family Readiness to learn: Asks questions, Cooperative Primary learners preferred spoken language: ENG Primary learners preferred written language: ENG Method of education: Printed material, Verbal discussion Patient rating of current knowledge level: Good Patient/Family education subject items: Medications, Disease process, Safety, Procedures, Pain management, ED after care/follow up, Medical equipment, INCENTIVE SPIROMETER Learner(s) verbalized understanding and/or return demonstration of items: Yes Pt/Family encouraged verbalize anxieties and reassurance given: Yes Pt/Family/Significant other informed of condition and treatment plan: Yes Pt/Family/Significant other encouraged give input and participate in tx: Yes	
10/06/20 0006 Disposition - DC, TX, ADM, LPT - - DISPOSITION - - Patient disposition: Discharge Disposition Category: Discharged Chief Complaint: Rib Pain Patient will remain injury free while patient is in restraint or seclusion: Not applicable Expected outcome of chief complaint: Stabilized/maintained Actual outcome of chief complaint: Stabilized/maintained Flowsheet: Yes Assess pain: Yes Pain intensity: 0 Document teaching education: Yes Patient email address: DECLINED		MARTIN, CHLOE, RN		10/05/20 2200 Teaching Education - - Patient/Family Teaching - - Primary learner: Patient Other learner: Family Readiness to learn: Asks questions, Cooperative Primary learners preferred spoken language: ENG Primary learners preferred written language: ENG Method of education: Verbal discussion Patient rating of current knowledge level: Good Patient/Family education subject items: Medications, Disease process, Safety, Procedures, Pain management, ED after care/follow up, Medical equipment Learner(s) verbalized understanding and/or return demonstration of items: Yes Pt/Family encouraged verbalize anxieties and reassurance given: Yes Pt/Family/Significant other informed of condition and treatment plan: Yes Pt/Family/Significant other encouraged give input and participate in tx: Yes	
- DISCHARGE ASSESSMENT - - Discharge information provided: Instructions/prescription Discharge instructions given to and verbalized understanding by: PATIENT AND FAMILY Patient discharged from ED by provider and not seen by RN: No Patient left to: Home Patient left with: Family Mode patient left: Ambulatory Patient left via: Family member ==INFECTION== ==NEW ORGAN DYSFUNCTION within past 48 hours== - FLOW SHEET - - - VITAL SIGNS - - Temperature F: 98.1 Temperature source: Oral Pulse: 93 Pulse source: Monitor Respiratory rate: 16 Respiratory source: Observed Vital signs position: Sitting Blood pressure: 130/80 Blood pressure location: Arm upper left Blood pressure source: Monitor Mean arterial pressure: 96 SPO2 %: 97 - HEIGHT AND WEIGHT - - BMI calculated: 31.0 - OXYGEN THERAPY - - Oxygen delivery devices: Room air - PAIN SCALE - -				10/06/20 0004 INCENTIVE SPIROMETER MARTIN, CHLOE, RN 10/06/20 0004 Recheck Vitals - - DETAILED FLOWSHEET - - Pulse: 91 MARTIN, CHLOE, RN	

RUN DATE: 10/07/20
 RUN TIME: 0711
 RUN USER: HPF.FEED

Trident Health System EDW **LIVE**
 EMERGENCY PATIENT RECORD

PAGE 4

Patient: ROCHA, ALFREDO
 EDM Provider: McCarthy, Jordan MD, ZhcaActive

Age/Sex: 55/M

Acct No: D0006857434
 Unit No: D000685969

Medication

Sch Date-Time Ordered Dose Admin Dose
 Doc Date-Time Given - Reason Site User
 Override Comment
 OXYCODONE HCL/ACETAMINOPHEN 10/325 TAB (PERCOCET 10-325 MG TAB) PO/X1ED/ONE
 10/05/20-2230 - 1 TAB 1 TAB
 10/05/20-2222 Y NAPIER, ALICIA RN

Administering for pain: Yes

(End)

Pain details:

Pain scale utilized: Non-verbal WONG-BAKER
 Wong-Baker pain scale: Hurts even worse 6
 Pain intensity: 6
 Most common side effects reviewed with patient?: Yes
 :: OXYCODONE: Dizziness, Sedation, nausea/vomiting, Constipation

IBUPROFEN 800 MG TABLET (IBUPROFEN) PO/X1ED/ONE
 10/05/20-2230 800 MG 800 MG
 10/05/20-2222 Y NAPIER, ALICIA RN

Administering for pain: Yes

(End)

Pain details:

Pain scale utilized: Non-verbal WONG-BAKER
 Wong-Baker pain scale: Hurts even worse 6
 Pain intensity: 6
 Most common side effects reviewed with patient?: Yes
 :: IBUPROFEN: nausea/diarrhea, headache, increased BP

TETANUS, DIPHTHERIA TOXOID ADULT 0.5 ML SYR (TETANUS DIPHTHERIA) IM/X1ED/ONE
 10/05/20-2230 0.5 ML 0.5 ML
 10/05/20-2223 Y RJA NAPIER, ALICIA RN

Difference between amount dispensed and amount administered was discarded.

Manufacturer: SANOFI Lot #: U6669AA
 Exp Date: 05/15/22 Series #:

Admin Site: RD

VIS given: Y

VIS Edition/Date: 04/01/2020

*Use F9 Lookup

Press F12 to file.

Most common side effects reviewed with patient?: Yes
 :: TETANUS: injection site rxn, headache, weakness

DEPARTURE INFORMATION

Primary Impressions: Contusion of rib on right side

Secondary Impressions:

Left knee sprain
 Contusion of right elbow
 Sprain of right shoulder

Disposition: ROUTINE HOME/SELF CARE

Comment:

Condition: STABLE

Referrals:

CROSSLEY, NANCY ELIZABETH MD
 922B MEDICAL PLAZA DRIVE

Departure Date/Time: 10/05/20 - 2352

CHARLESTON, SC 29406
 Phone: (843) 574-2500 Fax: (843) 574-2501
 Follow-up Plan: Follow up as needed

Kalv, Gregory Douglas MD
 295 A MIDLAND PARKWAY STE 260
 SUMMERVILLE, SC 29485
 Phone: (843) 695-2700 Fax: (843) 875-4046
 Follow-up Plan: Follow up as needed

Pt Instructions: ED Contusion, Elbow, ED Sprain Knee, ED Contusion, Rib, ED Shoulder Sprain

Additional Instructions:

Departure Forms:

Date Patient Physically Leaves ED: 10/05/20
 Time Patient Physically Leaves ED: 2352

Return to Work/School

Return to work:

Return to school:

Comment:

Prescriptions/Reported Meds	Type	Issued	Provider	Last Edit
HYDROcodone/APAP 7.5/325 MG (NORCO 7.5/325 MG) 1 EACH	Rx	10/05/20	HOMKE	10/05/20
TAB				
1 TAB ORAL (by mouth)				
EVERY 6 HOURS AS NEEDED As Needed for SEVERE PAIN				
#12 TAB REF 0				
IBUPROFEN (NITRIN) 800 MG TAB	Rx	10/05/20	HOMKE	10/05/20
800 MG ORAL (by mouth)				
EVERY 8 HOURS AS NEEDED As Needed for PAIN #15 TAB				
REF 0				

ADDITIONAL TESTS/RESULTS

WITHIN DEFINED PARAMETERS

~~ ASSESSMENT PARAMETERS ~~

These are the definitions of Within Defined Parameters by Body System

NEUROLOGICAL

- Alert & Oriented X 4
- Pupils equal
- Speech clear and appropriate for age
- Moves all extremities
- No paralysis
- Steady gait
- Ambulates independently

EENT

- Eyes - Clear, no tearing or redness
- Ears - No complaint of hearing difficulty, loss of hearing, or change in hearing, pain free, no drainage
- Nasal - Breathes freely through both nares
- Throat - No hoarseness or stated soreness, no cough

RESPIRATORY

CARDIAC

RUN DATE: 10/07/20
 RUN TIME: 0711
 RUN USER: HPF.FED

Trident Health System EDM **LIVE**
 EMERGENCY PATIENT RECORD

PAGE 5

Patient: ROCHA, ALFREDO
 EDM Provider: McCarthy, Jordan MD, 2hcaActive

Age/Sex: 55/M

Acct No: D0006857434
 Unit No: D000685969

- No respiratory distress
- No cough
- No O2 or assistive devices
- No nasal flaring or pursed lip breathing
- Respirations even & unlabored
- Skin pink & warm to touch

- No stated calf tenderness
- No history of pacemaker or implanted defibrillator
- Denies current cardiac complaint
- Skin pink & warm to touch - no cyanosis, mottling, diaphoresis or flushing of skin

CIRCULATORY

- Oral mucosa pink and moist
- Skin color appropriate to ethnic color
- Denies sensory complaints
- No edema noted

MUSCULOSKELETAL

- Moves all extremities
- Ambulates independently

GASTROINTESTINAL

- Denies GI complaints

GENITO-URINARY

- Denies GU complaints

INTEGUMENTARY

- Skin warm, dry & intact
- No complaints of lesions, rash, wounds, bruises, petechiae or abrasions

PSYCHOSOCIAL

- With regards to cultural influences: mood/affect is appropriate
- Patient demonstrates effective coping skills/patterns for situation

These are the definitions of Within Defined Parameters for the Nutritional and Functional Screenings:

NUTRITIONAL

- No swallowing/chewing impairments
- No nausea and/or vomiting and/or diarrhea for 3 or more days
- No reported unintentional weight loss > 10 lbs in last 3 months
- No reported decrease in intake > 50% of usual in last two weeks

FUNCTIONAL

- No unexplained alteration in movement/mobility in last four weeks
- No recent limitation performance of ADLs
- No recent alteration in ADLs that require assistance

This is the definition for the evidence of Physical and/or Psychological Abuse question:

ABUSE HISTORY TO INCLUDE, BUT NOT LIMITED TO:

PT DOES NOT REPORT/NO EVIDENCE OF ANY OF THE FOLLOWING: abuse/neglect, Hx. of abuse/neglect, withdrawn/fearful behavior, Unexplained or suspicious bruises/wounds, Patient/Caregiver story changes, Defensive about injuries, Undernourished despite good appetite, Recurrent/Suspicious injuries, Fear of return to previous arrangements, Injuries do not match event history.

*** PATIENT SAFETY PARAMETERS ***

- ** Allergy and Patient Identification Bands in Place and Validated
- ** If in a Bed, Side Rails Up and Bed in Low Position With Wheels Locked
- ** If in a Wheelchair, Wheels Locked
- ** Call Light Function Explained and Within Reach
- ** Standard Precautions Observed

PAGE 2

ADMIT: 10/05/20
DISCH/DEP: 10/05/20
STATUS: ER
UNIT NO: D000895969

Service

Ordered By
MCCJ001

Start: 10/05/20 2230 ONE CMP
Stop: 10/05/20 2231

Direction: X1ED

1	10/05/20	2214	DPA.KH	Order ENTER in EDM/POM
2	10/05/20	2214	DPA.KH	Ordering Doctor: McCarthy.Jordan MD
3	10/05/20	2214	DPA.KH	Order Source: EPOM
4	10/05/20	2214	DPA.KH	Other Doctor: Homer,Kellen PA
5	10/05/20	2214	DPA.KH	Signed by Homer,Kellen PA
6	10/05/20	2222	DNUR.AN	order acknowledged
7	10/05/20	2231	SCHEDULER	DISCONTINUE in PHA
8	10/06/20	1714	PHY.JM2	Signed by McCarthy.Jordan MD

Electronically signed by Homer Kellen PA on 10/05/20 at 22:14

Electronically signed by McCarthy Jordan MD on 10/06/20 at 17:14

—Service—

Ordered By
MCCJ001

Sig Lvl Provider :

Right sided rib pain s/p fall

1	10/05/20	2225	DPA.KH	Order ENTER in EDM/POM
2	10/05/20	2225	DPA.KH	Ordering Doctor: McCarthy.Jordan MD
3	10/05/20	2225	DPA.KH	Order Source: EPOM
4	10/05/20	2225	DPA.KH	Other Doctor: Homer.Kellen PA
5	10/05/20	2225	DPA.KH	Signed by Homer.Kellen PA
6	10/05/20	2226	interface	order's status changed from TRANS to LOGGED by RAD
7	10/05/20	2257	interface	order's status changed from LOGGED to IN PRO by RAD
8	10/05/20	2259	interface	order service time edited: old value - 2225
9	10/05/20	2320	interface	order's status changed from IN PRO to COMP by RAD
10	10/05/20	1714	PHY.JM2	Signed by McCarthy.Jordan MD

Electronically signed by Homer Kellen PA on 10/05/20 at 2225

Electronically signed by McCarthy, Jordan MD on 10/06/20 at 17:14

85

RUN DATE: 10/13/20
RUN TIME: 1005
RUN USER: HPF.FEED

MEDITECH FACILITY: COCTR
IDEV - Discharge Report

PAGE 3

PATIENT: ROCHA, ALFREDO
ACCOUNT NO: D00066857434

A/S: 55 M
LOC: D.SED
RM:
BD:

ADMIT: 10/05/20
DISCH/DEP: 10/05/20
STATUS: ER
UNIT NO: D000895969

ATTEND DR: McCarthy, Jordan MD
REPORT STATUS: FINAL

Order Date: 10/05/20

—Service—

Category	Procedure Name	Order Number	Date	Time	Pri	Qty	Ord	Source	Status	Ordered By
RAD	SHOULDER COMPLETE, RIGHT	20201005-0414	10/05/20	2257	S		E		CMP	MCCJ001

Other Provider : HOMKE Sig Lvl Provider :

Order

details below

Reason for Exam:

Fracture

Comments:

Order's Audit Trail of Events

1	10/05/20 2225	DPA.KH	Order ENTER in EDM/POM
2	10/05/20 2225	DPA.KH	Ordering Doctor: McCarthy, Jordan MD
3	10/05/20 2225	DPA.KH	Order Source: EPOM
4	10/05/20 2225	DPA.KH	Other Doctor: Homer, Kellen PA
5	10/05/20 2225	DPA.KH	Signed by Homer, Kellen PA
6	10/05/20 2226	interface	order's status changed from TRANS to LOGGED by RAD
7	10/05/20 2257	interface	order's status changed from LOGGED to IN PRO by RAD
8	10/05/20 2259	interface	order service time edited: old value - 2225
9	10/05/20 2321	interface	order's status changed from IN PRO to COMP by RAD
10	10/06/20 1714	PHY JM2	Signed by McCarthy, Jordan MD

Electronically signed by Homer, Kellen PA on 10/05/20 at 2225

Electronically signed by McCarthy, Jordan MD on 10/06/20 at 1714

Order Date: 10/05/20

—Service—

Category	Procedure Name	Order Number	Date	Time	Pri	Qty	Ord	Source	Status	Ordered By
RAD	ELBOW RIGHT - 3 VIEWS	20201005-0415	10/05/20	2257	S		E		CMP	MCCJ001

Other Provider : HOMKE Sig Lvl Provider :

Order

details below

Reason for Exam:

Fracture

Comments:

Order's Audit Trail of Events

1	10/05/20 2225	DPA.KH	Order ENTER in EDM/POM
2	10/05/20 2225	DPA.KH	Ordering Doctor: McCarthy, Jordan MD
3	10/05/20 2225	DPA.KH	Order Source: EPOM
4	10/05/20 2225	DPA.KH	Other Doctor: Homer, Kellen PA
5	10/05/20 2225	DPA.KH	Signed by Homer, Kellen PA
6	10/05/20 2226	interface	order's status changed from TRANS to LOGGED by RAD
7	10/05/20 2257	interface	order's status changed from LOGGED to IN PRO by RAD
8	10/05/20 2259	interface	order service time edited: old value - 2225
9	10/05/20 2322	interface	order's status changed from IN PRO to COMP by RAD
10	10/06/20 1714	PHY JM2	Signed by McCarthy, Jordan MD

Electronically signed by Homer, Kellen PA on 10/05/20 at 2225

Electronically signed by McCarthy, Jordan MD on 10/06/20 at 1714

PERMANENT MEDICAL RECORD COPY

RUN DATE: 10/13/20
RUN TIME: 1005
RUN USER: HPF.FEED

MEDITECH FACILITY: COCTR
IDEV - Discharge Report

PAGE 4

PATIENT: ROCHA, ALFREDO
ACCOUNT NO: D00066857434

A/S: 55 M
LOC: D.SED
RM:
BD:

ADMIT: 10/05/20
DISCH/DEP: 10/05/20
STATUS: ER
UNIT NO: D000895969

ATTEND DR: McCarthy, Jordan MD
REPORT STATUS: FINAL

Order Date: 10/05/20
Category Procedure Name Order Number Date Time Pri Qty Ord Source Status Ordered By
RAD KNEE COMPLETE (3 VIEWS) LEFT 20201005-0416 10/05/20 2257 S E CMP MCCJ001
Other Provider : HOMKE Sig Lvl Provider :
Order
details below
Reason for Exam: Fracture
Comments:

Order's Audit Trail of Events

1 10/05/20 2225 DPA.KH Order ENTER in EDM/POM
2 10/05/20 2225 DPA.KH Ordering Doctor: McCarthy, Jordan MD
3 10/05/20 2225 DPA.KH Order Source: EPOM
4 10/05/20 2225 DPA.KH Other Doctor: Homer, Kellen PA
5 10/05/20 2225 DPA.KH Signed by Homer, Kellen PA
6 10/05/20 2225 interface order's status changed from TRANS to LOGGED by RAD
7 10/05/20 2257 interface order's status changed from LOGGED to IN PRO by RAD
8 10/05/20 2259 interface order's service time edited: old value - 2225
9 10/05/20 2324 interface order's status changed from IN PRO to COMP by RAD
10 10/06/20 1714 PHY.JM2 Signed by McCarthy, Jordan MD

Electronically signed by Homer, Kellen PA on 10/05/20 at 2225

Electronically signed by McCarthy, Jordan MD on 10/06/20 at 1714

Order Date: 10/05/20
Category Procedure Name Order Number Date Time Pri Qty Ord Source Status Ordered By
NUREDM Incentive Spirometer 20201005-0996 10/05/20 2225 S E TRN MCCJ001
Other Provider : HOMKE Sig Lvl Provider :
Press <Enter> for Order Details...

Order's Audit Trail of Events

1 10/05/20 2225 DPA.KH Order ENTER in EDM/POM
2 10/05/20 2225 DPA.KH Ordering Doctor: McCarthy, Jordan MD
3 10/05/20 2225 DPA.KH Order Source: EPOM
4 10/05/20 2225 DPA.KH Other Doctor: Homer, Kellen PA
5 10/05/20 2225 DPA.KH Signed by Homer, Kellen PA
6 10/06/20 1714 PHY.JM2 Signed by McCarthy, Jordan MD

Electronically signed by Homer, Kellen PA on 10/05/20 at 2225

Electronically signed by McCarthy, Jordan MD on 10/06/20 at 1714

Order Date: 10/05/20
Category Procedure Name Order Number Date Time Pri Qty Ord Source Status Ordered By
NUREDM Recheck Vitals 20201005-1059 10/05/20 2332 R E TRN MCCJ001
Other Provider : HOMKE Sig Lvl Provider :

Recheck VS Type: Heart Rate
Recheck VS Freq: Once

PERMANENT MEDICAL RECORD COPY

RUN DATE: 10/13/20
RUN TIME: 1005
RUN USER: HPF.FEED

MEDITECH FACILITY: COCTR
IDEV - Discharge Report

PAGE 5

PATIENT: ROCHA, ALFREDO
ACCOUNT NO: D00066857434

A/S: 55 M
LOC: D.SED
RM:
BD:

ADMIT: 10/05/20
DISCH/DEP: 10/05/20
STATUS: ER
UNIT NO: D000895969

ATTEND DR: McCarthy, Jordan MD
REPORT STATUS: FINAL

Order's Audit Trail of Events

1 10/05/20 2332 DPA.KH Order ENTER in EDM/POM
2 10/05/20 2332 DPA.KH Ordering Doctor: McCarthy, Jordan MD
3 10/05/20 2332 DPA.KH Order Source: EPOM
4 10/05/20 2332 DPA.KH Other Doctor: Homer, Kellen PA
5 10/05/20 2332 DPA.KH Signed by Homer, Kellen PA
6 10/06/20 1714 PHY.DM2 Signed by McCarthy, Jordan MD

Electronically signed by Homer, Kellen PA on 10/05/20 at 2332

Electronically signed by McCarthy, Jordan MD on 10/06/20 at 1714

** IDEV END OF REPORT **

PERMANENT MEDICAL RECORD COPY

SUMMERVILLE MEDICAL CENTER
295 MIDLAND PARKWAY
SUMMERVILLE, SC 29485

PHONE #: 843-832-5010
FAX #: 843-832-5017

Name: ROCHA, ALFREDO
Phys: McCarthy, Jordan MD
DOB: Age: 55 Sex: M
Acct: D00066857434 Loc: D.SED
Exam Date: 10/05/2020 Status: REG ER
Radiology No:
Unit No: D000895969

EXAMS:
005216340 ELBOW RIGHT - 3 VIEWS

Reason for Exam::

HISTORY:
Right elbow pain after MVA

COMPARISON:
None.

TECHNIQUE:
Three views of the right elbow

FINDINGS:
No evidence of acute fracture or dislocation. No joint effusion identified. Bone mineralization is normal. Large olecranon enthesophyte. The soft tissues are grossly unremarkable.

IMPRESSION:
1. No acute findings.
2. Prominent olecranon enthesopathic change.

** Electronically Signed by Benjamin J. Mullenbach MD **
** on 10/05/2020 at 2318 **
Reported and signed by: Benjamin J. Mullenbach, MD

CC:

Dictated Date/Time: 10/05/2020 (2318)
Technologist: KARLA S ATKINSON

Transcribed Date/Time: 10/05/2020 (2318)
Prepared By: PHY.BJML
Electronic Signature Date/Time: 10/05/2020 (2318)
Orig Print D/T: 8: 10/05/2020 (2322)
BATCH NO: N/A

PAGE 1

Signed Report

SUMMERVILLE MEDICAL CENTER
295 MIDLAND PARKWAY
SUMMERVILLE, SC 29485

PHONE #: 843-832-5010
FAX #: 843-832-5017

Name: ROCHA, ALFREDO
Phys: McCarthy, Jordan MD
DOB: Age: 55 Sex: M
Acct: D00066857434 Loc: D.SED
Exam Date: 10/05/2020 Status: REG ER
Radiology No:
Unit No: D000895969

EXAMS:
005216341 KNEE COMPLETE (3 VIEWS) L

Reason for Exam::

HISTORY:
Knee pain after MVA

COMPARISON:
None.

TECHNIQUE:
Three views of the left knee

FINDINGS:
No evidence of acute fracture or dislocation. Moderate
tricompartamental degenerative arthrosis is present. There are small
marginal femorotibial and patellar osteophytes. Bone mineralization
is normal. No joint effusion is present. The soft tissues are
grossly unremarkable.

IMPRESSION:
1. No acute findings.
2. Moderate tricompartamental osteoarthrosis.

** Electronically Signed by Benjamin J. Mullenbach MD **
** on 10/05/2020 at 2319 **
Reported and signed by: Benjamin J. Mullenbach, MD

CC:

Dictated Date/Time: 10/05/2020 (2319)
Technologist: KARLA S ATKINSON

Transcribed Date/Time: 10/05/2020 (2319)
Prepared By: PHY.BJML
Electronic Signature Date/Time: 10/05/2020 (2319)
Orig Print D/T: 8: 10/05/2020 (2324)
BATCH NO: N/A

PAGE 1

Signed Report

SUMMERVILLE MEDICAL CENTER
295 MIDLAND PARKWAY
SUMMERVILLE, SC 29485

PHONE #: 843-832-5010
FAX #: 843-832-5017

Name: ROCHA, ALFREDO
Phys: McCarthy, Jordan MD
DOB: Age: 55 Sex: M
Acct: D00066857434 Loc: D.SED
Exam Date: 10/05/2020 Status: REG ER
Radiology No:
Unit No: D000895969

EXAMS:
005216338 RIBS UNI W/CXR 3 + VIEWS

Reason for Exam: :

HISTORY:
Chest pain after MVA

COMPARISON:
None.

TECHNIQUE:
Four views of the right ribs and chest.

FINDINGS:
The visualized lungs are clear. No pneumothorax is seen. The cardiomediastinal silhouette is normal. No acute osseous findings are identified. Specifically, no displaced rib fractures are seen.

IMPRESSION:
No displaced rib fractures identified.

** Electronically Signed by Benjamin J. Mullenbach MD **
** on 10/05/2020 at 2316 **
Reported and signed by: Benjamin J. Mullenbach, MD

CC:

Dictated Date/Time: 10/05/2020 (2316)
Technologist: KARLA S ATKINSON

Transcribed Date/Time: 10/05/2020 (2316)
Prepared By: PHY.BJML
Electronic Signature Date/Time: 10/05/2020 (2316)
Orig Print D/T: S: 10/05/2020 (2320)

BATCH NO: N/A

PAGE 1

Signed Report

SUMMERVILLE MEDICAL CENTER
295 MIDLAND PARKWAY
SUMMERVILLE, SC 29485

PHONE #: 843-832-5010
FAX #: 843-832-5017

Name: ROCHA, ALFREDO
Phys: McCarthy, Jordan MD
DOB: Age: 55 Sex: M
Acct: D00066857434 Loc: D.SED
Exam Date: 10/05/2020 Status: REG ER
Radiology No:
Unit No: D000895969

EXAMS:
005216339 SHOULDER COMPLETE, RIGHT

Reason for Exam: :

HISTORY:
Right shoulder pain after MVA

COMPARISON:
None.

TECHNIQUE:
Four views of the right shoulder

FINDINGS:
No evidence of acute fracture or dislocation. The glenohumeral joint appears normal. Mild acromioclavicular joint degenerative change. Bone mineralization is normal. The soft tissues are grossly unremarkable. Visualized portions of the chest are unremarkable.

IMPRESSION:
No acute findings.

** Electronically Signed by Benjamin J. Mullenbach MD **
** on 10/05/2020 at 2317 **
Reported and signed by: Benjamin J. Mullenbach, MD

CC:

Dictated Date/Time: 10/05/2020 (2317)
Technologist: KARLA S ATKINSON

Transcribed Date/Time: 10/05/2020 (2317)
Prepared By: PHY.BJML
Electronic Signature Date/Time: 10/05/2020 (2317)
Orig Print D/T: 8: 10/05/2020 (2321)
BATCH NO: N/A

PAGE 1

Signed Report

10/07/20 0158		MEDICATION DISCHARGE SUMMARY		PAGE: 1
NAME: ROCHA, ALFREDO UNIT #: D000895969 ACCT #: D00066857434 CODED ALLERGIES No Known Drug Allergies CODED ADRs UNCODED ALLERGIES UNCODED ADRs		ADMIT DATE: DISCHARGE DATE: STATUS: DEP ER		AGE: 55 SEX: M
ADMINISTRATION PERIOD: 0700: 10/05/20 to 0659: 10/06/20		START/ STOP		
PERCOCET 10-325 MG TAB (OXYCODONE HCL/ACETAMINOPHEN 10/325 TAB) 1 TAB PO X1 IN ED/ONE Comments: PERCOCET 10-325 EACH TABLET CONTAINS .325 MG ACETAMINOPHEN MAXIMUM ADULT DOSE NOT TO EXCEED 4000 MG/ 24 HOURS RX #: 17675341		10/05/20 10/05/20	2214 Order Entry DPA.KH 2222 Nursing Acknowledged Order DNUR.AN 2230 DNUR.AN at 2222 GAVE: 1 TAB NDC/DIN: (SOURCE: eMAR) 6808471011 OXYCITAB6 - Oxycodone HCl/Acetaminophen 1... Administering for pain: Yes (End) Pain details: Pain scale utilized:: Non-verbal WONG-BAKER Wong-Baker pain scale:: Hurts even worse 6 Pain intensity:: 6 Most common side effects reviewed with patient?: Yes :: OXYCITAB6: Dizziness, Sedation, nausea/vomiting, Constipation 10/05/20-2223 File Document by DNUR.AN 2231 Pharmacy Discontinue SCHEDULER	
IBUPROFEN (IBUPROFEN 800 MG TABLET) 800 MG PO X1 IN ED/ONE Comments: THERAPEUTIC INTERCHANGE FOR KETOPROFEN, MECLOFENAMATE, NABUMETONE, OXAPROZIN, PIROXICAM, TOLMETIN RX #: 17675342		10/05/20 10/05/20	2214 Order Entry DPA.KH 2222 Nursing Acknowledged Order DNUR.AN 2230 DNUR.AN at 2222 GAVE: 800 MG NDC/DIN: (SOURCE: eMAR) 0904585561 IBUP800T - Ibuprofen 800 MG Tablet Administering for pain: Yes (End) Pain details: Pain scale utilized:: Non-verbal WONG-BAKER Wong-Baker pain scale:: Hurts even worse 6 Pain intensity:: 6 Most common side effects reviewed with patient?: Yes :: IBUP800T: nausea/diarrhea, headache, increased BP 10/05/20-2223 File Document by DNUR.AN 2231 Pharmacy Discontinue SCHEDULER	

*** CONTINUED ON PAGE 2 ***

This document is part of the legal medical record.

10/07/20 0158		MEDICATION DISCHARGE SUMMARY		PAGE: 2	
NAME: ROCHA, ALFREDO		UNIT #: D000895969		ACCT #: D00066857434	
ADMINISTRATION PERIOD 0700 10/05/20 to 0659 10/06/20 (Continued)		START/ STOP			
TETANUS DIPHTHERIA (TETANUS,DIPHTHER TOXOID ADULT 0.5 HL SYR) 0.5 HL IM X1 IN ED/ONE Comments: Td VIS RX #: 17675343		10/05/20 10/05/20		2214 Order Entry DPA,KH 2222 Nursing Acknowledged Order DNUR,AN 2230 DNUR,AN at 2223 SITE: RUA - Right Upper Arm GAVE: 0.5 ML HDC/DIN: (SOURCE: eMAR) 4920121588 TETAID.5 - Tetanus,Diphther Toxoid Adult... Manufacturer: SANOFI Lot #: U6669AA Exp Date: 05/15/22 Series #: Admin Site: RD VIS given: Y VIS Edition/Date: 04/01/2020 *Use FQ lookup Press F12 to file Most common side effects reviewed with patient?: Yes :: TETAID.5:injection site rxn, headache, weakness Difference between amount dispensed and amount administered was discarded. 10/05/20-2223 File Document by DNUR,AN 2231 Pharmacy Discontinue SCHEDULER	

10/07/20 0158	MEDICATION DISCHARGE SUMMARY	PAGE: 3
NAME: ROCHA, ALFREDO	UNIT #: D000895969	ACCT #: D00066857434

LEGENDS

REASON CODES

SITE CODES

RUA - Right Upper Arm

ADMINISTERED BY

USER: DNUR, AN
USER NAME/TYPE: NAPIER, ALICIA RN

USER: USER NAME/TYPE

USER: USER NAME/TYPE

USER: USER NAME/TYPE

OTHER USERS

USER: DPA, KH
USER NAME: HOMER, KELLEN

USER: USER NAME

USER: USER NAME

USER: USER NAME

PHA ALLERGY HISTORY

DATE: 10/05/20 2134 # PHA USER: DNUR, HK - KING, HAILEY

ALLERGY DETAILS

ADDED: No Known Drug Allergies
OLD: No Known Drug Allergies added. NO KNOWN DRUG ALLERGIES
NEW: No Known Drug Allergies added. NO KNOWN DRUG ALLERGIES

TRIDENT HEALTH
9330 MEDICAL PLAZA DRIVE
CHARLESTON, SC 29406

Nombre de Paciente: ROCHA, ALFREDO
Número de Expediente Médico: D000895969
Número de Cuenta: D00066857434

Página de Firma de Paciente

Nombre de Paciente: ROCHA, ALFREDO

Fecha de Nacimiento:

Nombre de Persona Encargada:

El paciente o persona encargada ha recibido lo siguiente:

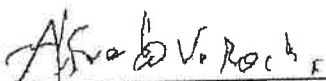
Informe de Visita de Paciente
Monografías de Medicamentos:
IBUPROFEN (MOTRIN)
HYDROcodone/APAP 7.5/325 MG (NORCO 7.5/325 MG)
Instrucciones para Paciente:
Contusion Elbow
Contusion Rib
Shoulder Sprain
Knee Sprain

Asegúrese de haber leído toda esta información antes de firmar.

He leído y entendido las instrucciones proporcionadas por los profesionales de salud.

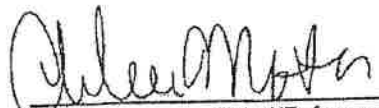
ALFREDO ROCHA

Escriba con letra de imprenta Nombre de Paciente


Firma de Paciente o Persona Encargada

Fecha

Hora


Firma de Prof de Salud/Enfermera/Médico

Fecha

Hora

130/80
97%
93 °/10
98.1 10

RESPONSIBLE PARTY	ACCOUNT #	BILL DATE
ALFREDO ROCHA	278386-CRPA	04-25-2023

CHARLESTON RADIOLOGISTS, PA
PO BOX 116429
ATLANTA, GA 30368-6429

ALFREDO ROCHA
168 RAMBO DR
SUMMERVILLE, SC 29483-4685

DOS	Patient	Physician	Phys Tax ID	Charge Description	Amt	Pmt	Adj	Bal
10-05-2020	ALFREDO ROCHA	125-MULLENBACH,		71101 26,RT - X-RAY EXAM UNILAT RIBS/CHEST	13.42			
10-05-2020	ALFREDO ROCHA	125-MULLENBACH,		73030 26,RT - X-RAY EXAM OF SHOULDER	9.32			
10-05-2020	ALFREDO ROCHA	125-MULLENBACH,		73080 26,RT - X-RAY EXAM OF ELBOW	8.63			
10-05-2020	ALFREDO ROCHA	125-MULLENBACH,		73562 26,LT - X-RAY EXAM OF KNEE 3	9.32			

Account
Balance:

FOR BILLING QUESTIONS PLEASE CALL (866) 794-5678

Account Number: 278386-CRPA

1 of 1

SGOVI

278386-CRPA-20095590

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Apr 02 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2024-001298
Case No. 2022-CP-18-01601

Alfredo Rocha

Appellant,

v.

Harold J. Murdaugh Jr.

Respondent.

AND

Graciela Rocha

Appellant,

v.

Harold J. Murdaugh

Respondent.

CERTIFICATE OF COUNSEL

The undersigned counsel certified that the Record on Appeal contains all material proposed to be included by all parties and not any other material.

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Counsel for Appellant

April 2, 2025
Charleston, SC

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Alfredo Rocha

Appellant,

v.

Harold J. Murdaugh Jr.

Respondent.

AND

Graciela Rocha

Appellant,

v.

Harold J. Murdaugh

Respondent.

CERTIFICATE OF COMPLIANCE

The undersigned counsel for the Appellant certifies that the Record on Appeal complies with the Supreme Court's Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings, issued April 2, 2025.

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Counsel for Appellant

April 2, 2025
Charleston, SC

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
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Alfredo Rocha Appellant,

v.

Harold J. Murdaugh Jr. Respondent.

AND

Graciela Rocha Appellant,

v.

Harold J. Murdaugh Respondent.

CERTIFICATE OF SERVICE

The undersigned counsel for Appellant Alfredo Rocha certifies that on April 2, 2025, he served the within Record on Appeal to Respondent Harold J. Murdaugh Jr. by sending a copy by email and US mail to the following counsel listed below:

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April 2, 2025
Charleston, SC

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Apr 02 2025

SC Court of Appeals

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April 2, 2025

VIA EMAIL AND US MAIL

The Honorable Jenny Abbott Kitchings
Clerk South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
ctappfilings@sccourts.org

Re: Alfredo Rocha, Appellant v. Harold J. Murdaugh, Jr., Respondent
Graciela Rocha, Appellant v. Harold J. Murdaugh, Jr., Respondent
Appellate Case No. : 2024-001298

Dear Sir/Madam:

In accordance with the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules and letter dated March 11, 2025, please find enclosed for filing the **Record on Appeal** in the above referenced matter. In accordance with this same order and letter, I am hereby serving copies on all counsel of record by email and USPS.

With kind regards, I am

Sincerely,

By: s/Gedney M. Howe, IV
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Attorneys for Appellants Alfredo Rocha and
Graciela Rocha

GMH,IV:ks

Enclosure: as stated

Cc: Jeffrey M. Crudup, Esq.
Michelle N. Endemann, Esq.
Michael T. Coulter, Esq.