

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY

Court of Common Pleas

William P. Keesley, Circuit Court Judge

Case No. 2007-CP-00-01981

Martha Lewin Argoe,

v. Appellant,

Three Rivers Behavioral Health,
LLC and Psychiatric Solutions,
Inc., its successor; Phyllis Bryan-
Mobley, MD; David A. Steiner,
MD; Cheryl C. Dodds, MD;
Doris Ann Burrell, RN; and
Carolina Care Plan,

Respondent,

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DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

ORDERS

1. Order Granting Partial Summary Judgment in Favor of Defendants Three Rivers Behavioral Health, LLC, Phyllis Bryant-Mobley, MD and Cheryl C. Dodds, MD
2. Order Granting Summary Judgment as to David A. Steiner, MD
3. Order Granting Summary Judgment in Favor of Defendant Doris Ann Burrell, RN
4. Order on Reconsideration.
5. Order allowing amended complaint
6. Order of Detention of Orangeburg County Probate Court dated June 6th, 2005.

7. Judgment and Order of Darlington County Probate Court dated June 21st, 2005.

PLEADINGS

8. Second Amended Complaint
9. Defendant David Steiner, M.D.'s Answer to Plaintiff's Second Amended Complaint
10. Answer to Second Amended Complaint on Behalf of Phyllis Bryant-Mobley, M.D.
11. Answer to Second Amended Complaint on Behalf of Defendant, Cheryl C. Dodds, M.D.
12. Answer to Plaintiff's Second Amended Complaint by Defendants Three Rivers Behavioral Health, LLC and Doris Ann Burrell, RN

DEPOSITION TRANSCRIPTS

13. Deposition of Martha Argoe
14. Deposition of David A. Steiner, M.D.
15. Deposition of Phyllis M. Mobley, M.D.
16. Deposition of Cheryl C. Dodds, M.D.
17. Deposition of Doris Ann Burrell, R.N.
18. Deposition of Barbara Ann Seignious
19. Deposition of Kent Whitfield
20. Deposition of Gregg J. Colle, M.D.
21. Deposition of Dave Davis, M.D.
22. Deposition of Lucinda L. Debruce
23. Deposition of Frank Quinn, Ph.D
24. Deposition of Donna Marie Schwartz-Watts, M.D.
25. Deposition of George Lewis Argoe, Jr.
26. Deposition of George Lewis Argoe, III

HEARING TRANSCRIPTS

27. Hearing Transcript – Motions Hearing Before the Honorable William P. Keesley, August 29, 2103.

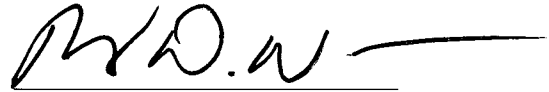
MOTIONS AND SUPPORTING MEMORANDUM OF LAW

28. Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment
29. Supplemental Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment
30. Plaintiff's Motion for Reconsideration
31. Plaintiff's Motion for Reconsideration (Pertaining to Order Granting Summary Judgment to David A. Steiner, M.D.)
32. Plaintiff's Motion for Reconsideration (Pertaining to Order Granding [sic] Summary in favor of Defendant Doris Ann Burrell, RN)
33. Motion to Substitute Counsel.

OTHER

34. Stipulation of Dismissal as to Psychiatric Solutions, Inc.
35. Stipulation of Dismissal as to Aiken Regional Medical Centers, Inc.
36. Stipulation of Dismissal as to Carolina Care Plan
37. Notice of Appearance of Robert D. Dodson

I certify that this designation contains no matter which is irrelevant to this appeal.

A handwritten signature in black ink, appearing to read "R.D.W.", followed by a long horizontal line extending to the right.

Robert D. Dodson, Esquire
Law Offices of Robert Dodson, P.A.
1722 Main Street, Suite 200
Columbia, South Carolina 29201
Telephone: 803.252.2600
Facsimile: 803.771.2259
Attorney for Appellant

October 29, 2014
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Case No. 2007-CP-32-01981

Martha Lewin Argoe,

Appellant.

v.

Three Rivers Behavioral
Health, LLC; Phyllis Bryan-
Mobley, MD; David A.
Steiner, MD; Cheryl C.
Dodds, MD; Doris Ann
Burrell, RN

Respondent,

PROOF OF SERVICE

I certify that I have served the **Initial Brief of Appellant and Designation of Matter to be Included in Record on Appeal** on all Respondents by depositing a copy of it in the United States Mail, postage prepaid, on October 29, 2014, addressed to their attorneys of record, listed below as:

William Davidson, Esquire
Andrew Lindemann, Esquire
Davidson & Lindemann, PA
1611 Devonshire Drive, 2nd Floor
PO Box 8568
Columbia, SC 29202
Attorney for Phyllis Bryan-Mobley, MD

James E. Parham, Jr., Esquire
James E. Parham, Jr., P.A.
P.O. Box 1576

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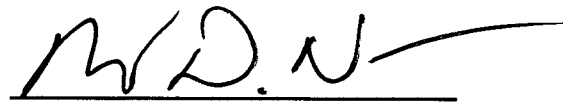
Irmo, SC 29063
Attorney for Cheryl C. Dodds, MD

Kenneth N. Shaw, Esquire
J. Ben Alexander, Esquire
Haynswork, Sinkler Boyd, PA
One North Main, 2nd Floor (29601)
PO Box 2048
Greenville, SC 29602
Attorneys for Cheryl C. Dodds, MD

Elloreë Gaines, Esquire
Molly Craig, Esquire
Hood Law Firm, LLC
172 Meeting Street
PO Box 1508
Charleston, SC 29402
Attorney for David A. Steiner, MD

Andrew N. Cole, Esquire
Christian Stegmaier, Esquire
Collins & Lacy, P.C.
1330 Lady Street, 6th Floor (29201)
PO Box 12487
Columbia, SC 29211
Attorney for Three Rivers and Doris Ann Burrell

October 29, 2014



Robert D. Dodson, Esquire
Law Offices of Robert Dodson, P.A.
1722 Main Street, Suite 200
Columbia, South Carolina 29201
Telephone: 803.252.2600
Facsimile: 803.771.2259
Attorney for Appellant

Law Offices of
ROBERT DODSON, P.A.
1722 Main Street, Suite 200
Columbia, South Carolina 29201

Robert D. Dodson,
Esquire
Attorney at Law
Also Licensed in N.C.



Telephone:
803.252.2600
Facsimile:
803.771.2259

October 29, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Martha Lewin Argoe, Appellant v. Three Rivers Behavioral Health, LLC, et al., Respondents
Case No. 2007-CP-32-01981

Dear Ms. Kitchings:

I hope this letter finds you doing well. Enclosed please find the original and one copy of the Initial Brief of Appellant and Designation of Matter to be Included in Record on Appeal in the above referenced matter. Please file the original and return the clocked copy in the self-addressed, stamped envelope provided.

If you should need anything further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Tasha L. Smith".

Tasha L. Smith,
Paralegal to Robert D. Dodson, Esquire

cc: William Davidson, Esquire
Andrew Lindemann, Esquire
Davidson & Lindemann, PA
1611 Devonshire Drive, 2nd Floor

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PO Box 8568
Columbia, SC 29202
Attorney for Phyllis Bryan-Mobley, MD

James E. Parham, Jr., Esquire
James E. Parham, Jr., P.A.
P.O. Box 1576
Irmo, SC 29063
Attorney for Cheryl C. Dodds, MD

Kenneth N. Shaw, Esquire
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One North Main, 2nd Floor (29601)
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1330 Lady Street, 6th Floor (29201)
PO Box 12487
Columbia, SC 29211
Attorney for Three Rivers and Doris Ann Burrell