

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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FEB 02 2015

Appeal from Lexington County  
Court of Common Pleas

**SC Court of Appeals**

Honorable William P. Keesley, Circuit Court Judge

C.A. No. 2007-CP-32-1981

App. No. 2014-001511

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Martha Lewin Argoe,

Appellant,

v.

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

Respondents.

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**DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL  
BY RESPONDENT DAVID A. STEINER, M.D.**

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Pursuant to Rule 209, SCACR, Respondent David A. Steiner, M.D. designates the following items for inclusion in the Record on Appeal in addition to those designated by the Appellant and/or other Respondents:

From C.A. No. 2007-CP-32-1981:

1. Complaint, filed June 6, 2007;
2. Dr. Steiner Motion for Summary Judgment, filed April 3, 2008;
3. Dr. Davis Affidavit, dated May 6, 2008;
4. Judge Milling Order (granting partial summary judgment to Dr. Steiner), July 2, 2008;
5. Second Amended Complaint, dated January 6, 2012;
6. Dr. Steiner Answer to the amended complaint, served January 23, 2012;

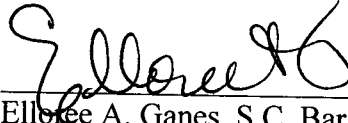
7. Dr. Steiner Motion for Summary Judgment (on the medical malpractice claim), filed January 4, 2013,
8. Dr. Steiner Memorandum in Support of Summary Judgment Motion, filed August 29, 20013;
9. Judge Keesley Order (granting summary judgment to Dr. Steiner), filed March 21, 2014;
10. Plaintiff's Motion to Alter or Amend, served April 7, 2014;
11. Judge Keesley Order (denying motion to alter or amend), filed June 9, 2014;
12. Notice of Appeal, served July 1, 2014;
13. Deposition of Dave Davis, May 30, 2013;
14. 8/29/13 Hearing Transcript;
15. Argoe v. Three Rivers Behavioral Ctr. & Psychiatric Solutions, Op. No. 26844; 388 S.C. 394, 697 S.E.2d 551 (2010) [*Argoe I*];
16. Argoe v. Three Rivers Behavioral Health, L.L.C., Op. No. 26978; 392 S.C. 462, 710 S.E.2d 67 (2011) [*Argoe II*]; and

From underlying, related Probate Court Proceedings, which were exhibits to the various motions and memoranda:

17. Application for Involuntary Emergency Hospitalization for Mental Illness, filed with the Orangeburg County Probate Court on June 6, 2005;
18. Probate Judge Jones-Glover's Order of Detention, issued June 6, 2005;
19. Certificate(s) of Licensed Physician Examination for Emergency Admission, signed by Dr. Hooker, dated June 8, 2005;
20. Notification of Emergency Admission and Appointment of Designated Examiners, dated June 10, 2005;
21. Probate Judge Lawson's Order for Continued Hospitalization and for Hearing, issued June 13, 2005;
22. Probate Judge Lawson's Order appointing designated examiners, issued June 14, 2005;
23. Probate Judge Lawson's Order of Commitment, June 21, 2005;
24. Petition to Vacate Commitment Proceedings, filed March 25, 2008, in Dorchester County Probate Court;
25. Dorchester Probate Judge Provence Order, filed August 25, 2008; and
26. Judge Goodstein Order on appeal from Judge Provence Order, C/A No. # 2008-CP-18-2401, filed January 5, 2010.

The undersigned certifies that this Designation contains no material which is irrelevant to the appeal.

**Hood Law Firm, LLC**



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Ellee A. Ganes, S.C. Bar No.70509

Deborah H. Sheffield, *Of Counsel*, S.C. Bar No. 2757

P.O. Box 1508

Charleston, SC 29402

(843) 577-4435

**Attorneys for Respondent**

**David A. Steiner, M.D.**

January 30 2015

STATE OF SOUTH CAROLINA  
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Court of Common Pleas

Honorable William P. Keesley, Circuit Court Judge

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Cheryl C. Dodds, MD; Doris Ann Burrell, RN and the Carolina Care Plan,

Respondents.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 30th day of January 2015 a copy of the Initial Brief of Respondent David A Steiner, M.D. and his Designation of Matter to Be Included in the Record on Appeal were served by depositing said copy in the U.S. Mail, with sufficient first class postage, on the following counsel at the addresses listed below:

Robert D. Dodson, Esquire  
Law Offices of Robert Dodson, P.A.  
1722 Main Street, Suite 200  
Columbia, SC 29201  
*Counsel for Appellant*

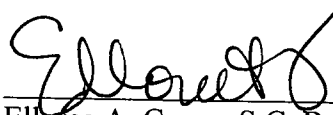
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(843) 577-4435

**Attorneys for Respondent David A. Steiner,  
M.D.**

January 30, 2015

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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**SC Court of Appeals**

Re: Martha Lewin Argoe v. 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  
C/A No 07-CP-32-1981, Lexington CP  
Appellate Case No. 2014-001511  
HLF File No 242 044

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the Initial Brief of Respondent, David A. Steiner, MD and the Respondent David A. Steiner, MD's Designation of Matter to be Included in the Record on Appeal, along with the Certificate of Service regarding the above-referenced case. Please return a clocked-in copy of each in the envelope provided. By copy of this letter, I am serving all counsel.

Kind regards,

Yours truly,



Elloree A. Ganes

EAG/jad

Enclosure(s)

cc: Robert D. Dodson, Esquire  
Andrew N. Cole, Esquire  
William H. Davidson, II, Esquire  
James E. Parham, Jr., Esquire  
Kenneth N. Shaw, Esquire

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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
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