



The South Carolina Court of Appeals

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August 28, 2014

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FEB 03 2015

SC Court of Appeals

Mr. Robert J. Butcher, Esquire
PO Box 610
Camden SC 29021

Mrs. Deborah J Butcher, Esquire
PO Box 610
Camden SC 29021

Re: Timothy Green v. Lt. Franklin Richardson, Jr. (SCDC)
Appellate Case No. 2014-000674

Dear Counsel:

This Court has received your motion to withdraw as counsel. By copy of this letter, opposing counsel and your client are requested to file a return to this motion no later than ten (10) days from the date of this letter. The time limits for perfecting the appeal will be held in abeyance until the motion is decided.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Timothy Green, 113830
Christopher D. Florian, Esquire
G. Murrell Smith, Jr., Esquire

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FEB 03 2015

SC Court of Appeals

2011-11-22 13:11:10

STATE OF SOUTH CAROLINA

COUNTY OF LEE

Timothy Green,

Plaintiff,

v.

South Carolina Department of Corrections,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE THIRD JUDICIAL CIRCUIT
Case No.: 2011-CP- 31-187

SUMMONS

TO: DEFENDANT ABOVE-NAMED

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this matter, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscribers at their office, 1029 Broad Street, Post Office Box 610, Camden, South Carolina 29021, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

THE CAMDEN LAW FIRM, PA


Robert J. Butcher
Attorney for Plaintiff
1029 Broad Street
Camden, South Carolina 29020
Post Office Box 610
Camden, South Carolina 29021
Telephone: 803.432.7599
Facsimile: 803.432.7466
S.C. Bar No.: 74722

Camden, South Carolina
August 2, 2011

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

Exh J

INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy Green

SCDC NUMBER: 113830

INSTITUTION: LEE CORR. INST.

HOUSING UNIT: Kershaw N. RM 1254

WORK ASSIGNMENT: DORM

Grievance No. LCI 2463-

Code: General -JL/JL

Policy -JL/JL

Disc. Hear.

Class.

PREA

Date Received 10/17/13

IGC Initials KW

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

ON OR ABOUT 8th of Oct. 2013. I Timothy Green #113830 was denied my dinner tray healthy heart. They said the tray never was sent from the kitchen. Lt. Goodman, Lt. Reiten, Sgt. Jenki was put on notice of my tray hasn't been sent. They know that I am sick. I can't eat that process meat and cold cuts. I have been sick and swelling up, and hungry. That process meat swells me up with gas and gives me infections. And they tried to give me a regular tray which would have set my stomach on fire. This is an 8th Amendment violation cruel and unusual punishment. I have been denied one of my basic needs. I have bleeding ulcers and gastrotal ulcers. For days I haven't eaten a good hot meal. The food is always cold. They didn't give us dinner until 7:15.

ACTION REQUESTED:

That this grievance be processed so I can send this grievance to my attorney. I spoken with Lts and serge on this matter. Nothing was done.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

Signature 10-8-13

Grievant Signature

Date

(CONTINUE ON REVERSE SIDE)

The South Carolina Court of Appeals

Appeal from Lee County +
Dishonville Court. Judge
Administrative Law Court

Timothy Green 11.38.30
✓ Appellant

Lt Franklin Richardson Jr
Respondent

Designation of matter to be included in
the record on appeal.

IN THE UNITED STATES DISTRICT
COURT FOR THE STATE OF SOUTH CAROLINA

Timothy Green #113830
Plaintiff
✓

CASE NO.: 6:14-CV-
02595-MGL-KFM

S.C. D.C. Lt. Franklin Richardson Jr.

Nurse Pratt, Nurse Practitioner

Rabon, Nurse Franklin, Nurse Moody

Nurse Karen Cooper, Officer Thompson SMIS

Sgt. Price, Officer Cain, Lt. Ms. Jenkins

Officer Farmer, Officer Ms. Mckens, Sgt. DEMARVIE

Nurse Jones, Head Doctor at Headquarters

Doctor Merez. Defendants.

Plaintiff Motion for this Honorable
Court to get depositions from the defendants
and inmates Ronald Shaunsel BRAUNSON,

Artie Burns 318252, Musa Brantner,

I sent Attorney Robert Butcher the state

LEGAL MAIL

- Meats And declarations from. The Supreme Court has order him to send me the files with Pictures. Medical Record grievances. Notions orders pertaining to this case. Plaintiff has Proof with all his witnesses of the Abuse by causing overly use of the agent they use at Lee. Plaintiff states his Medical Records was the Medical Computer recommended by Nurse Practitioner Rabon and Nurse and doctors after Plaintiff was severely injured and ill for months. which is deliberate indifference. And Abuse by staff security and Medical. They denied Plaintiff medical Attention which has Plaintiff in the medical situation his in now. At this point. defendant aren't giving the Marshalls the addresses to find doctors and nurses.

LEGAL MAIL

defendants are plotting with the nurses and
ex-officers. They are hiding from the Federal
Marshalls. Defendants can't stand to take a
lie detector test. Plaintiff wishes this Honorable
Court order that he be given a lie detector
test. Plaintiff states that defendants won't
allow themselves to take one. Because the
questions that I will give the examiner
to ask them will get them large sentences,
and freed and that's a fact Plaintiff demands
and beg this Honorable Court to move for
Attorney Robert Butcher send him his
files that the state supreme court has ordered
completely.

LEGAL MAIL

7. This is not an isolated incident this is PATTERN.

8. Lt. Franklin Richardson Jr. did not file a Meritons Report.

9 Lt. Richardson Jr. And Nurse Cooper statements are conflicting.

See Exh A.1 Exb.2

10. Inadequate Medical Treatment

11. Medical Malpractice

Plaintiff have statement to show the actions of Lt. Franklin Richardson Jr. over the years and his assaulting friends.

12. Plaintiff Attorney had Plaintiff afraid for his life. Because he left him in the hands of these people a Lee Ann. Sub

LEGAL MAIL
SALUDA UNIT

Exh. D

STATE OF SOUTH CAROLINA

COUNTY OF LEE

Timothy Green,

v.

South Carolina Department of Corrections,

Defendants.

) IN THE COURT OF COMMON PLEAS
) FOR THE THIRD CIRCUIT
) C.A. NO.: 2011-CP-31-0187

**ORDER GRANTING SUMMARY
JUDGMENT**

This matter is before the Court on the Defendant's Motion for Summary Judgment filed on August 22, 2013. A Hearing on the Motion was held in the Lee County Court of Common Pleas on November 15, 2013. Robert J. Butcher, Esquire attended on behalf of the Plaintiff while G. Murrell Smith, Jr., Esquire represented the Defendant. After hearing oral arguments and reviewing the Briefs submitted by both Parties, for the reasons stated herein below, the Defendant's Motion for Summary Judgment is **GRANTED** and this case is dismissed:

FINDINGS OF FACT

Plaintiff alleges that the Defendant's conduct was negligent and grossly negligent in its dealings with the Plaintiff. The Defendant denied the allegations. The facts in the light most favorable to the Plaintiff presented in the Record are as follows: On or about March 11, 2010, Lieutenant Franklin Richardson, an Employee with the South Carolina Department of Corrections, alleged that Inmate Green was cursing and threatening him. Inmate Green was taken to the Special Management Unit at Lee Correctional Institution.

D. No. 3

By Plaintiff's own admission, he placed his walkman in his pants. He alleged that he was doing this to protect his property.

After the Plaintiff was transported to the Special Management Unit, he was placed in the BOSS Chair to search for contraband. At that time, the walkman radio was located in his pants. He was then placed in the Holding Cell. The Plaintiff alleges that Lieutenant Richardson was laughing at him and the Plaintiff told him "you ain't nothing but an ex-stripper". **Deposition Page 58, lines 9-15.** Lieutenant Richardson alleges that he was yelling, cursing and threatening him while in the Holding Cell.

Following this exchange, Lieutenant Richardson administered Top Cop MK-9 gas into the Holding Cell. Following the administration of chemical munitions, the Nurse was called to evaluate the Plaintiff. Nurse Karen Cooper appeared at the Holding Cell to provide assistance.

The Plaintiff was let out of the Holding Cell to go to the Nurses' Station across the hall. The Plaintiff alleges that as he was being taken over to the Nurses Station, the gas was coming up from his mouth because it went down his throat. He claims that Lieutenant Richardson rushed him and slammed him to the floor. He kept hitting his head against the floor, kneeling him in the ribs and punching him in the face. **See Deposition Page 63, line 13 through Page 64, line 10.** The Plaintiff alleges that he was punched in the face, in the jaw and in between the nose. **See Deposition Page 69, line 25 through Page 70, line 18.**

Lieutenant Richardson, in his Affidavit, states that as the Plaintiff was walking towards the Nurses Station, he lunged towards Lieutenant Richardson and spit on his right arm. At that time, Lieutenant Richardson placed his arm behind his back and took him down to the ground to subdue him. This was corroborated by Nurse Karen Cooper's Affidavit.

Following the incident, the Plaintiff was taken to the medical facility at Lee Correctional Institution. He was provided care although he continued to complain of improper care to his knees, face and ribs.

The Plaintiff was convicted of threatening to inflict harm/assault on an employee. This was at a Disciplinary Proceeding in which the Plaintiff appeared.

The Plaintiff commenced this action alleging Gross Negligence and Negligence Per Se against the South Carolina Department of Corrections for failure to supervise employees not to physically harm or use excessive force on inmates; failure to train its employees in a proper use of force and chemical munitions and for failing to hire and/or retain employees who have a history of violence and abusing prisoners.

The Plaintiff also alleged that the South Carolina Department of Corrections was Grossly Negligent and Negligent Per Se for failure to supervise its medical staff and insure that injured inmates were provided proper medical attention, trained employees to properly treat inmates and provide them with medical attention; breaching their duty to provide medical treatment and attention to the Plaintiff; failure to manage and supervise employees to provide proper medical attention and properly attend and treat injured inmates like the Plaintiff.

Lastly, the Plaintiff alleged that the conduct of Lieutenant Richardson placed the Plaintiff in reasonable fear of bodily injury and pled a cause of action for Assault. The Plaintiff also said that Lieutenant Richardson's forceful contact with the Plaintiff amounted to Battery and requested damages for the same. The Defendant denied the Plaintiff's Complaint and pled that the matter was controlled by the South Carolina Tort Claims Act as provided in 15-78-10 and pled Sovereign Immunity. Lastly, the Defendant allege that the Plaintiff failed to exhaust his administrative remedies.



CONCLUSIONS OF LAW

I. THE PLAINTIFF IS PRECLUDED FROM PREVAILING ON HIS CAUSES OF ACTION OF ASSAULT AND CAUSE OF ACTION OF BATTERY PURSUANT TO THE SOUTH CAROLINA TORT CLAIMS ACT.

The Plaintiff alleges that "on March 11, 2010, Lieutenant Franklin Richardson brutally assaulted Plaintiff while Plaintiff was in handcuffs". From the Plaintiff's pleadings, it is obvious that the Plaintiff is alleging that Lieutenant Franklin Richardson willfully and intentionally attacked the Plaintiff. Furthermore, the Plaintiff attempted to sign warrants for assault and battery against Lieutenant Richardson but was denied so by the South Carolina Department of Corrections and/or a Lee County Magistrate.

The Plaintiff sued the South Carolina Department of Corrections and not Lieutenant Richardson individually which the Plaintiff did not plead Negligent Supervision in his cause of action for Assault or Battery. Thus, the Defendant is not liable for the actions of Lieutenant Richardson. Pursuant to S.C. Code Ann. §15-78-60 (17), the Governmental Entity is not liable for a loss resulting from employee conduct outside the scope of his official duties or which constitute actual fraud, actual malice, intent to harm or a crime involving moral turpitude.

The facts in the light most favorable to the Plaintiff would show that Lieutenant Richardson became agitated by the Plaintiff and intentionally and unlawfully attacked him. The Plaintiff alleges that Lieutenant Richardson threw him to the ground while handcuffed, kned him in the ribs and punched him in the jaw, eye and nose. There is no doubt the facts alleged by the Plaintiff show an intent to harm the Plaintiff. While your Defendant denies these facts as alleged by the Plaintiff, in a light most favorable assuming the Plaintiff's facts are true, then your Defendant is immune from suit pursuant to S.C. Code Ann. §15-78-60 (17).

The Plaintiff did not sue Lieutenant Richardson for his alleged intentional acts. Therefore, the Plaintiff cannot maintain acts for assault and battery in which he alleges there was intent to harm by Lieutenant Richardson against the Defendant, South Carolina Department of Corrections.

Your Defendant also alleges the facts as alleged by the Plaintiff did not occur. The allegations of the Plaintiff are only supported in the record by his own testimony. There is ample independent evidence that exists to demonstrate that the Plaintiff's claims are false. The Plaintiff has an extensive litigation history with the South Carolina Department of Corrections.

From the Affidavit of Nurse Karen Cooper, it was apparent that the Plaintiff became out of control and charged Lieutenant Richardson. Lieutenant Richardson subdued the Plaintiff pursuant to the Policies and Procedures of the South Carolina Department of Corrections. Therefore, the overwhelming evidence supports the facts as contained in Lieutenant Richardson's Affidavit. Regardless, S.C. Code Ann. §15-78-60 (17) doesn't allow the Plaintiff to maintain a Cause of Action against the Defendant for Battery.

The Plaintiff's attorney conceded that he could not maintain Causes of Action for Intentional Torts against the Defendant South Carolina Department of Corrections. Specifically, those were procluded by S.C. Code Ann. §15-78-60 (17) and S.C. Code Ann. §15-78-30 (D). A Governmental Entity includes Political Subdivisions and Agencies thereof. See S.C. Code Ann. §15-78-30 (a), (c)(d)(h) (Defining "Agency", "Employee", "Governmental Entity", and "Political Subdivision"). A State Employee is defined under the Act as "any officer, employee or agent of the State or its Political Subdivisions including Elected or Appointed Officials, Law Enforcement Officers, and persons acting on behalf of in service of Governmental Entity in the scope of official duty." S.C. Code Ann. §15-78-30(c).

II. THE DEFENDANT IS IMMUNE FROM LIABILITY PURSUANT TO S.C. CODE ANN. § 15-78-60 (25).

A. Subsection 15-78-60(25) provides that a governmental entity is not liable from “responsibility or duty including but not limited to supervision, protection, control, confinement, or custody of any student, patient, **prisoner**, inmate or client of any governmental entity, except when the responsibility or duty is exercised in a grossly negligent manner.” S.C. Code Ann. § 15-78-60(25)(emphasis added).

Gross negligence is the intentional conscious failure to do something which is incumbent upon one to do or the doing of a thing intentionally that one ought not to do. Etheridge v. Richland School District 1, 341 S.C. 307, 310, 534 S.E.2d 275, 277 (S.C. 2000). “Gross negligence, in the context of liability by a governmental entity, is the intentional conscious failure to do something which it is incumbent upon one to do or the doing of a thing intentionally that one ought not to do; it is the failure to exercise slight care.” Jinks v. Richland County, 355 S.C. 341, 345 (S.C. 2003). “Additionally, while gross negligence ordinarily is a mixed question of law and fact when the evidence supports but one reasonable inference, the question becomes a matter of law for the court.” Pack v. Associated Marine Institutes, Inc., 362 S.C. 239, 245 (Ct. App. 2004)(citing Etheridge, 341 S.C. at 310)). The Plaintiff has the burden of proving gross negligence. See Stewart v. Richland Memorial Hospital, 450 S.C. 589 (Ct. App. 2002) (Finding that while a governmental entity has the initial burden of establishing a limitation upon liability or an exception to the waiver of immunity, the plaintiff must still prove that the governmental entity has waived immunity)).

scf As in Pack, there is absolutely no evidence in the record demonstrating that Defendant was grossly negligent. The Pack court determined that summary judgment was proper after finding that employees acted with at least slight care. Pack, 362 S.C. at 245. As in this case, the plaintiff in the Pack case argued the defendants could have done more to address a juvenile’s

behavior problems before the juvenile acted out. Id. However, the court determined “[t]he fact that more might have been done does not negate a finding that [defendant] employees exercised at least slight care.” Id. (citing Etheredge, 341 S.C. at 311-12 (holding that where defendant had no knowledge of animosity between students, and principal and security monitored hallways, the fact that school district might have done more did not negate the fact it exercised slight care for purposes of determining whether gross negligence exception to Tort Claims Act was applicable)).

The Plaintiff alleges that Lieutenant Richardson had a history of excessively using gas on inmates. They also allege that Lieutenant Richardson assaulted or excessively used force on inmates listed in the Plaintiff's Complaint. In support of this allegation, the Plaintiff submitted statements from fellow inmates. (See Exhibit B) None of these statements indicate that the South Carolina Department of Corrections knew or should have known of these alleged assaults by Lieutenant Richardson.

Furthermore, the entire personnel file of Lieutenant Richardson was produced by the South Carolina Department of Corrections to the Plaintiff. While there is a number of disciplinary actions and reports contained in his personnel file, none are alleging unlawful force. There is no disciplinary write-ups or actions for assaults on inmates.

If the Plaintiff is alleging that Lieutenant Richardson should have never deployed the chemical munitions into the Plaintiff's cell. The Defendant submits that this is in accordance with their Policy. The Court has reviewed the Chemical Munition Policy of SCDC. It clearly allows chemical munitions to be deployed when the Inmate refuses to obey a lawful order. The Plaintiff was requested numerous times to stop acting erratically and to calm down. He failed to comply until chemical munitions were deployed.

B. The Plaintiff alleges Defendant was negligent in the hiring, training and supervision of its employees.

The Supreme Court of South Carolina has held in circumstances where an employer knew of or should have known that its employment of a specific person created an undue risk of harm to the public, a plaintiff may claim that the employer was itself negligent in hiring the employee. James v. Kelly Trucking Co., 377 S.C. 628, 631 (2008). Negligent hiring cases “generally turn on two fundamental elements—knowledge of the employer and foreseeability of harm to third parties.” Kase v. Ebert, 392 S.C. 57 (2011). Although foreseeability is usually an issue of fact, “the court should dispose of the matter on a dispositive motion when no reasonable fact finder could find the risk foreseeable or the employer’s conduct to have fallen below the acceptable standard.” Id. The standard in negligent hiring and retention cases is whether the employer knew the offending employee was in the habit of misconducting himself in a manner dangerous to others. Doe v. ATC, Inc., 367 S.C. 199 (Ct. App. 2005).

The record is void of any knowledge that any employee of Defendant created an undue risk of harm to the public. Any such claims are based on speculation and conclusory statements. Furthermore, the Plaintiff’s claims that Defendant negligently trained its staff is unsupported by the record. There is no expert testimony regarding the training of Defendant’s staff.

Furthermore, pursuant to S.C. Code Ann. §15-78-60 (25), it is necessary to show that the Defendant was grossly negligent in its supervision of the Plaintiff. The negligent supervision claim still required the Plaintiff to show gross negligence or “the failure to exercise slight care”. The Plaintiff has not documented any evidence of Negligent Supervision. The record is completely devoid of any evidence of Negligent Supervision, let alone the Defendant’s “failure to exercise slight care.”

Table of Contents

Exh A, B, C, D.

Medical Exam

Medical Records

SEE Declaration by SINTHA HUNTER #249892

SEE Declaration by JABBAR IOMO STRAWS #231018

SEE Exh D.

SEE Exh G.

SEE Exh Motion for his legal files with Attorney

Robert Butcher that's before his honorable

Court.

Robert Butcher + Deborah Butcher is a witness

that it's "NO WAY" possible that Plaintiff

could have fell and hit his eye.

SEE Motion before the Court of Common

Pleas & the Third Judicial Circuit.

LEGAL MAIL
SALUDA UNIT

Motion for a jury trial demanded.

SEE EXH AA

SEE EXH 2B

SEE EXH EXH i

SEE EXH K

SEE EXH J

SEE EXH H 1

EXH H 2

EXH H 3

EXH H 4

EXH H 5

EXH H 6

EXH H 7

EXH H 8

EXH H 9

EXH H 10

EXH H 11

EXH H 12

SEE S.C.D.C Medical Summary

LEGAL MAIL
SALUDA UNIT

South Carolina Court of Appeals
In the Court of Common Pleas
For The Third Judicial Circuit
CASE NO: 2011-CP-31-187

Timothy Green #113830

APPELLATE

Initial Brief of
APPELLATE APPEAL

CASE # NO: 2011-CP-31-

South Carolina Department of
Corrections Defendant Lt. Franklin
Richardson Jr.

Dated: [REDACTED] 22, 2014

Timothy Green
Timothy Green

LEGAL MAIL
SALUDA UNIT

THE SOUTH CAROLINA COURT OF APPEALS

Timothy LOREEN 113830

BROADRIVER CORR. INST.

MAZODAS A RM# 165

4460 BROADRIVER RD.

Columbia S.C. 29210 Appellant

v.

Lt. FRANKLIN Richardson Jr. (S.C.D.C.)

~~MAZODAS~~ CASE NO. 2014-~~000~~ 674

Respondent

TIMOTHY LOREEN #113830 declares under the penalty of perjury that he mailed a copy of his Disignation of Matter. To The Parties listed below. By Placing in the U.S. Mail Clearly Addressed

LEE, ERTEA, WILSON, HOLLER & SMITH LLC

P.O. Box 580

SUMTER, S.C. 29151

S.C.C. OF APPEALS

P.O. Box 11629

COLA, S.C. 29211

LEGAL MAIL
SALUDA UNIT

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEALS FROM THE COURT OF COMMON PLEAS
FOR THE THIRD JUDICIAL CIRCUIT
CASE NO: 2011-CP-31-187

ROBERT GREEN #113830
✓ APPELLANT

LT. FRANKLIN RICHARDSON JR (S.C.D.C.)
RESPONDANT

Designation of Matter to be included in the Record
ON APPEAL

APPELLANT REQUESTS the following be included in the
Record ON APPEAL.

1. ATTORNEY Robert Butcher is a witness to the injuries to my eye, ribs, and knees.
2. ATTORNEY Robert Butcher has the pictures of my injuries.

LEGAL MAIL
SALUDA UNIT

3. EXCESSIVE USED FORCE

4. ASSAULT & BATTERY

5. GROSS NEGLIGENCE AND NEGLIGENCE

6. MOVE FOR SANCTIONS AGAINST NORSE COOPER AND LT. FRANKLIN RICHARDSON JR. FOR LYING TO THIS HONORABLE COURT IN A SWORN STATEMENT.

7. SANCTIONS FOR PERJURY

8. LT. FRANKLIN RICHARDSON JR. LT. DAVIS LT. JUNE SGT.

BRAYBOY LT. MAJOR, ~~ASS~~ WARDEN DEAN, HAS A HISTORY OF ASSAULTING INMATES. I HAVE A LIST OF INMATES AND STATEMENTS SWEARING TO THIS HONORABLE COURT ABOUT THE ASSAULTS AND BEATINGS BY THE OFFICERS.

SOME HAVE BEEN FIRED. THE ADMINISTRATION HAS COVERED UP YEARS OF BEATINGS BY THESE PEOPLE.

THEY HAVE A HISTORY OF THESE CRIMES AND OTHER TRICKS, QUIBBLERS, AND LIES.

LEGAL MAIL
SALUDA UNIT

1. Plaintiff ASK this honorable Court to look at these
Exhs B. Exh. C. Exh. E.

2. Exh E. Initial report 3/11/10 NO witnesses, NO employees
involved. NO evidence.

3. Incident Report written in the third person.
Meaning he didn't write it.

4. The conflicting statement of Lt Franklin Richardson Jr.
And Nurse Cooper.

5. Nurse Cooper NEVER made a initial report or report
as a witness I would've called her at the
D.H.O hearing. She stated she didn't witness
Anything I have proof.

6. Lt Franklin Richardson Jr. didn't write or file a
USE of force report.

LEGAL MAIL
SALUDA UNIT

Table of Authorities

2011-11-22 13:11:14

STATE OF SOUTH CAROLINA

COUNTY OF LEE

Timothy Green,

Plaintiff,

v.

South Carolina Department of Corrections,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE THIRD JUDICIAL CIRCUIT

Case No.: 2011-CP-31-187

AFFIDAVIT OF SERVICE

PERSONALLY APPEARED before me Layla B. Coker who, being duly sworn, deposes and says that she is not a party to these proceedings and has no interest therein; that on the 15th day of November, 2011, she served, via U.S. mail, a filed copy of the **Civil Court Coversheet, Summons and Complaint** in the above case by causing the same to be deposited in an authorized United States mailbox; that the envelope containing said document was properly addressed, securely wrapped and sealed, and bore the proper postage; and the said envelope was addressed to the following address:

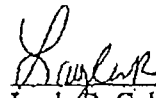
William R. Byars, Jr.

Agency Director

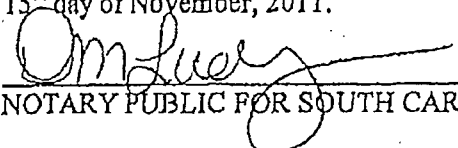
South Carolina Department of Corrections

Post Office Box 21787

Columbia, South Carolina 29210


Layla B. Coker, Paralegal

SWORN to and subscribed before me this
15th day of November, 2011.


NOTARY PUBLIC FOR SOUTH CAROLINA

My commission expires 11/22/2015

2011-11-22 13:11:10

STATE OF SOUTH CAROLINA

COUNTY OF LEE

Timothy Green,

Plaintiff,

v.

South Carolina Department of Corrections,

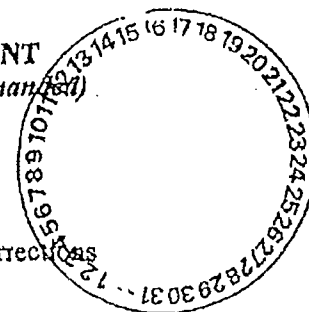
Defendants.

IN THE COURT OF COMMON PLEAS

OF THE THIRD JUDICIAL CIRCUIT

Case No.: 2011-CP-31-187

COMPLAINT
(Jury Trial Demand)



Plaintiff complains of the Defendant South Carolina Department of Corrections (SCDOC) and states the following:

I. PARTIES AND JURISDICTION

1. Plaintiff Timothy Green is a citizen and resident of Aiken County, South Carolina. Green is in the custody of the South Carolina Department of Corrections and was also in Defendant's custody at the time the incidents alleged in this complaint took place. Green currently resides at Lee Correctional Institution in Bishopville, South Carolina.

2. Upon information and belief Defendant SCDOC is a statutory creature created by the General Assembly of the State of South Carolina and it is part of the executive branch. SCDOC was the custodian of Plaintiff Timothy Green at the time he was harmed while in the custody of SCDOC.

3. The tortious acts and constitutional violations described in this Complaint occurred in Lee County, South Carolina.

4. The things and matters alleged herein are within the jurisdiction of this Court pursuant to S.C. Code Ann. § 15-78-100.

5. Venue is proper as the tortious acts occurred here in Lee County.

2011-11-22 13:11:12

22. SCDOC and its managers, supervisors, and employees breached its duty to properly supervise its employees and supervisors to insure that inmates like Timothy Green are not physically beaten by the likes of Lieutenant Franklin Richardson.

23. SCDOC and its managers, supervisors, and employees breached its duty to properly supervise other employees and supervisors to insure that other correctional officers stop the illegal and excessive uses of force.

24. SCDOC and its managers, supervisors, and employees breached its duty to train Lieutenant Franklin Richardson on the proper use of force and chemical munitions to insure that inmates like Timothy Green were not unnecessarily harmed and injured.

25. SCDOC and its managers, supervisors, and employees had a duty to insure that the employees it hires and/or retains are not violent and dangerous and these same employees do not have a history of violence and abusing prisoners and SCDOC and its managers and supervisors, and employees breached that duty by hiring and/or retaining Lieutenant Franklin Richardson even though he had a history of violence and using excessive force.

26. Defendant SCDOC's breach of the duties listed above were the proximate cause of Plaintiff's injuries and had SCDOC not breached those duties Plaintiff would not have suffered and continue to suffer from unnecessary injuries from the assault.

27. Because this duty was breached by SCDOC, Plaintiff was injured and these damages include physical pain from the battery, emotional distress, alteration of his lifestyle, psychological trauma, apprehension, anxiety, depression, embarrassment, shame, permanent injury to his eyes, mouth and throat, knees, ribs and back, and he suffers from a loss of enjoyment of life.

2011-11-22 13:11:11

13. Other correctional officers did not stop the beating.
14. Plaintiff suffered painful and permanent damages to his eye, head, neck, back, and knee.
15. Plaintiff has not received proper medical attention for these injuries and has been refused treatment by the corrections offices and medical staff.

**FOR A FIRST CAUSE OF ACTION
(Gross Negligence and Negligence Per Se)**

16. Plaintiff incorporates paragraphs 1-15 as if stated herein verbatim.
17. SCDOC and its managers, supervisors, and employees had a duty to protect its inmates from harm from the general population of inmates and from its correctional officers.
18. SCDOC and its managers, supervisors, and employees had a duty to supervise its employees and insure that they did not physically harm or use excessive force on its inmates.
19. SCDOC and its managers, supervisors, and employees had a duty to train

its employees on the proper use of force and chemical munitions to insure that inmates were not unnecessarily harmed.
20. SCDOC and its managers, supervisors, and employees had a duty to insure that the employees it hires and/or retains are not violent and dangerous and these same employees do not have a history of violence and abusing prisoners
21. SCDOC and its managers, supervisors, and employees breached its duty to protect its inmates when Timothy Green was physically beaten by Lieutenant Franklin Richardson and no other correctional officer attempted to stop the illegal and excessive use of force.

2011-11-22 13:11:12

28. Plaintiff Timothy Green seeks damages and costs against SCDOC.

**FOR A SECOND CAUSE OF ACTION.
(Gross Negligence and Negligence Per Se)**

29. Plaintiff incorporates paragraphs 1-28 as if stated herein verbatim.

30. SCDOC and its managers, supervisors, and employees had a duty to provide medical attention and treatment to its inmates that have suffered from physical injury.

31. SCDOC and its managers, supervisors, and employees had a duty to supervise its medical staff and insure that the injured inmates were provided proper medical attention and treatment.

32. SCDOC and its managers, supervisors, and employees had a duty to train its employees to properly treat injured inmates and to provide injured inmates proper medical attention and treatment.

33. SCDOC and its managers, supervisors, and employees breached its duty to provide medical attention and treatment to Plaintiff as his treatment was limited to first aid, triage, and little else.

34. SCDOC and its managers, supervisors, and employees breached its duty to supervise its medical staff and insure that Plaintiff was provided proper medical attention and treatment.

35. SCDOC and its managers, supervisors, and employees breached its duty to train its employees to properly attend and treat injured inmates like Timothy Green and to provide injured inmates like Timothy Green proper medical attention and treatment.

2011-11-22 13:11:13

36. Defendant SCDOC's breach of the duties listed above were the proximate cause of Plaintiff's injuries and had SCDOC not breached those duties Plaintiff would not have suffered and continue to suffer from unnecessary injuries from the assault.

37. Because this duty was breached by SCDOC, Plaintiff was injured and these damages include physical pain from the battery, emotional distress, alteration of his lifestyle, psychological trauma, apprehension, anxiety, depression, embarrassment, shame, permanent injury to his eyes, mouth and throat, knees, ribs and back, and he suffers from a loss of enjoyment of life..

38. Plaintiff Timothy Green seeks damages and costs against SCDOC.

FOR A THIRD CAUSE OF ACTION
(Assault)

39. Plaintiff incorporates paragraphs 1-38 as if stated herein verbatim.

40. The actions and conduct, as listed above of Lieutenant Franklin Richardson placed Timothy Green in reasonable fear of bodily injury.

41. Timothy Green's damages includes emotional distress, alteration of his lifestyle, psychological trauma, apprehension, anxiety, depression, embarrassment, shame, and a loss of enjoyment of life.

42. Plaintiff Timothy Green seeks actual damages and costs from the Defendants SCDOC for assault.

FOR A FOURTH CAUSE OF ACTION
(Battery)

43. Plaintiffs incorporate paragraphs 1-42 as if stated herein verbatim.

44. Lieutenant Franklin Richardson caused forcible contact on the person of Plaintiff Timothy Green.

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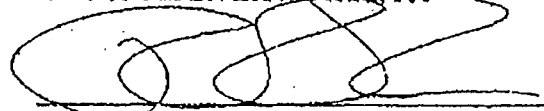
45. Plaintiff Timothy Green's damages includes physical pain from the battery, emotional distress, alteration of his lifestyle, psychological trauma, apprehension, anxiety, depression, embarrassment, shame, and a loss of enjoyment of life.

46. Plaintiff Timothy Green seeks actual damages, punitive damages, and attorney's fees and costs from the Defendants SCDOC for battery.

WHEREFORE, Plaintiffs respectfully pray for the following relief:

- A. For judgment against all Defendants for actual damages to be determined by the Court and a jury;
- B. For the costs and disbursements in the pursuit of this action; and
- C. For such other and further relief as this Court may deem just and proper.

THE CAMDEN LAW FIRM, PA



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Attorneys for Plaintiff
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S.C. Bar No.: 74029/74722

Camden, South Carolina
July 30, 2011

DECLARATION OF TRUTH BY SINATRA HUNTER.

I SINATRA HUNTER #249892 HEREBY DECLARE UNDER THE PENALTY OF PERJURY.

1, THAT I AM A PRISONER, IN CUSTODY OF THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS, CURRENTLY IN THE CHESTERFIELD NORTH OF THE LEE COUNTY CORRECTIONAL INSTITUTION.

2, I AM OF LEGAL AGE, COMPETENT, AND MAKE THIS DECLARATION OF TRUTH WITHOUT FORCE OR COERCION, BUT OF MY OWN FREE WILL AND THOUGHT.

3, THE FACTS ARE SET FORTH IN THIS DECLARATION AS FOLLOWS:
IN 2009 WHILE BEING HOUSED IN THE CHESTERFIELD UNIT, OF LEE CORRECTIONAL INST. LIEUTENANT MR. FRANKLIN RICHARDSON WAS THE DORM UNIT SUPERVISOR, WHO HOLDS THE RANK OF LIEUTENANT.

4, LT. MR. RICHARDSON IS VERY UNPROFESSIONAL, AGGRESSIVE AND ABUSIVE TOWARD PRISONER'S. I SINATRA HUNTER HAVE ON SEVERAL OCCASIONS WITH MR. RICHARDSON, CHOKED PRISONER'S WITH HIS BEAR HANDS, BIC HE'S ALWAYS OUT TO PROVE THIS TOUGH ANY IMAGE TOWARD PRISONER'S, AND I SAW RICHARDSON SPRAY PRISONER'S IN THE FACIAL AREA, WITH GAS CHEMICALS, WHEN PRISONER'S ARE AT NO POINT POSE A THREAT TO HIMSELF OR OTHER'S.

5, LT. MR. RICHARDSON HAS A HABIT OF QUOTEN OUT LOUD, ALL PROUDLY WHICH HE USES TO JUSTIFY HIS ABUSE, IS, WHO WORD HOLDS THE MOST WEIGHT WITH HIS ADMWSTRATIVE CO-WORKERS WHO WITH HIM TO PROTECT AND SERVE, OR THEIR PRISONER'S, WHO'S HERE FOR VIOLATION THE LAWS. SOMETHING OF THAT EXACT NATURE IS WHAT LT. RICHARDSON BOOSTES ABOUT.

6. MR. RICHARDSON DOESN'T MAKE SURE THE PRISONERS IN HIS DORM RECEIVE THE ADEQUATE FOOD THEIR SUPPOSE TO GET WHICH COMES TO THE DORM DAILY, THE SANDWICHES ARE ALWAYS COLD, SOME MOLDED, AND MOST OF THEM SMELL BAD. LT RICHARDSON SAYS THAT'S WHAT THE CAFETERIA SEND. SO WE EITHER TAKE IT, OR DON'T TAKE NOTHING. BEING ARROGANT TOWARD US PRISONERS.

7. MR. RICHARDSON ALSO OFFER PRISONERS PROTECTION OR AN ADVANCE DORM HOUSING, IF A PRISONER AGREES TO GIVE HIM INFORMATION ON ILLEGAL ACTIVITIES THAT MAY BE CURRENT OF HIS DORM. HE'S OFFERED IT TO ME THATS HOW I KNOW FOR A FACT...

8. MR. RICHARDSON IS VERY DISTRUCTIVE IN THE DORM AND DOES NOT HAVE PRISONERS BEST INTEREST TO PROTECT AND SERVE AS HIS REQUIREMENTS OF DUTY CALLS FOR!

9. MR. RICHARDSON IN MY OPINION DOES NOT NEED TO BE A CORRECTIONAL OFFICER IN S.C.D.C BECAUSE HIS HOPE DEMEANOR IS ARROGANT, AND HE WALKS AROUND LIKE "YEAH WHAT I DID THAT!"

10. MR. RICHARDSON SHOOT GAS AND ATTACK WITH VIOLENCE I'VE ASK QUESTIONS LATER!

- VERIFICATION OF DECLARATION -

I HAVE READ THE FOREGOING DECLARATION AND HEREBY VERIFY THAT THE MATTER'S ALLEGED HEREIN ARE TRUE, EXCEPT AS TO MATTERS ON INFORMATION AND BELIEF, AND AS TO THOSE, I BELIEVE TO BE TRUE AND CORRECT. END OF DECLARATION OF TRUTH BY SWATHA HUNTER

EXECUTED IN BISHOPVILLE SOUTH CAROLINA ON
AUGUST 10, 2009.

Sinatra Date #049892
LEE. C.I. CHESTFIELD UNIT.
990 WISACKY HWY
BISHOPVILLE S.C. 29201

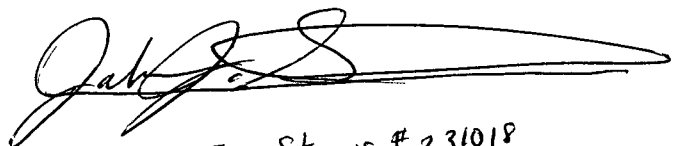
DECLARATION OF JABBAR JOMO STRAWS, #231018

I, Jabbar J. Straws, #231018, a prisoner currently incarcerated at Broad River Correctional Institution (BRCI), a department within the South Carolina Department of Corrections (SCDC), hereby declares:

1. Before being housed here at Broad River Correctional Institution I was housed at Lee Correctional Institution from 07-25-06 to 11-10-10.
2. That while at Lee Correctional Institution I did witness then Sgt. F. Richardson and later Lt. F. Richardson use excessive force on prisoners that did not pose a immediate threat by spraying them with pepper spray in the face.
3. I did also hear of rumors of this same officer jumping on prisoners in isolated areas of the prison while the prisoner was in handcuffs.

I declare under the penalty of perjury that the foregoing is true and correct.

This 24 day of
January, 2015



Jabbar Jomo Straws, #231018
Broad River Correctional Institution
4460 Broad River Rd.
Columbia, South Carolina 29210
DECLARANT

STATEMENT OF CASE Exh D

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF SOUTH CAROLINA DECLARATION

Timothy Green
✓ Plaintiff

9:09-CV-03270-DCN-
BM Civil Action #

WARDEN ANTHONY PADULA, DEPUTY WARDEN MARGARET BELL
SMU ASST. BRUCE OBERMAN, LT. FRANKLIN RICHARDSON JR.
MAJOR JAME L. DEAN, SGT. FRANCES BOWMAN, LAW LIBRARIAN
JENNIFER LIVINGSTON, MAIL ROOM SANDRA SIMON BRACEY, D.HO
SHARON PATTERSON, GRIEVANCE COR. LESIA JOHNSON, GRIEVANCE
COR. CATHERINE JAMES, SMU CHAS. DAVIS SGT.

I Timothy Green #113330 hereby declare: That on the 31st of
Lt. FRANKLIN RICHARDSON JR. did brutally Assaulted ONE Timothy
GREEN while in handcuffs and also sprayed gas into his
mouth which resulting blisters all over his tongue, and the
lost of taste in his mouth. Also bruised ribs and a busted
eye with a scrape on the eye ball. Which resulting in
blurred vision in his right eye, when the sun is shining
outside and light hits his eye. It causes severe head aches.
And both knees are busted up and Plaintiff is in great pain
with his knee on a daily bases. Lt. FRANKLIN RICHARDSON JR.
Assaulted ~~Plaintiff~~ Plaintiff Timothy Green because Plaintiff filed
A law suit against him and defendants Lt. Richardson every
since he found out Plaintiff was suing him. Lt. Richardson
and the rest of the officers would delay in bringing
Plaintiff his food. And when he receive it it would be cold.
Plaintiff wrote Sled, Lee County Sheriff department and also
Investigator General, The investigator at Lee Corr. Inst.
And the Attorney Generals office. The Warden ANTHONY PADULA
Deputy Wardens MARGARET BELL about the Assault. Trying to
press criminal charges against Lt. FRANKLIN RICHARDSON JR.

Plaintiff thinks that Mail Room Shadist. Simon Boney has thrown
his letters out in the trash. They wouldn't send my Civil Action
Complaint out until Plaintiff had inmate to mail his complaint
out for him inmate AJANAIE ROACH #291887.

Also Medical hasn't been treating my injuries and my knees are
killing me. And I have headaches every day. From Lt. Richardson
slamming my head on the floor and punching me in my face.
Officer L. Thompson that works Lockup will tell you about all
the blisters I had on my tongue and in my mouth and Medical
hasn't treated me for that yet or my knees.

Also they "Medical" has allowed my stomach to get so bad that
I have "two" 2 types of ulcers that killing me daily.

And I still think that my liver is very damaged from the
water at Alameda Corr. Inst. Lee Corr Inst. Evans Corr Inst.
with the boil water advisories. Especially at Alameda
and here. The water smell bad sometimes. They won't
run test on my liver or check my liver. They know that I
am right. And they are allowing my health to deteriorate.
I filed grievance after grievance the grievance corr. Lesia
Johnson and Catherine James are covering up for the
warden. Deputy warden and staff. Also the warden
Anthony Padula. Deputy warden Bell was serving pork
to the Muslim community here at Lee Corr. Inst. See
complaint amendments to complaint or amended
of my civil complaint. Also LAIS Librarian Jennifer
Livingston hasn't sent my book yet. I've filed Request
March. I haven't gotten legal books yet. I've sent
Request after Request nothing No Replies.

I have problem getting my legal supplies and they
don't even care. I've file complaints through I.R.C.
About Policy Violations by Warden, Deputy Warden
and DHO Sharon Pattersons. The Warden told

IRC MEMBERS AND CHAIRMAN TO SEE HIM. IVE
WRITTEN ASS. BRUCE DIERMAN ABOUT MY LEGAL PROBLEM HE
WOULDN'T RESPOND. AND WHEN HE COMES THROUGH HE ACTS
AS THOUGH HE DIDN'T HEAR ME CALL HIM.

I PRAYING THAT THIS HONORABLE COURT WOULD TRANSFER
ME TO ANOTHER INSTITUTION UNTIL MY CASE IS RESOLVED
AND TO GET MEDICAL ATTENTION THAT I DESPERATELY
NEED.

AFTER THE ASSAULT I WAS UP HERE 7 DAYS IN SEVERE PAIN
WITHOUT MEDICAL ATTENTION. THE LIE AND SAID THAT I HAD
SEEN THE NURSE. BUT SHE HAD WRITTEN DOWN HER FILES
THAT SHE TOLD THE OFFICERS THAT I NEEDED MEDICAL
ATTENTION AND THAT I NEEDED X-RAYS ON MY HEAD THE
HE WAS SLAMMING MY HEAD ON THE FLOOR.

THEY WERE HOPING THAT I WOULD LAY DOWN AND EXCEPT
HAD HAPPENED TO ME. I KNOW THAT I CAN'T WIN PUTTING
HANDS ON THE OFFICERS. I'M NONVIOLENT AND I PREACH
THAT TO THE YOUNG GUYS AND THEY LISTEN TO ME.
THEY HAVE A LOT OF RESPECT FOR ME OLD AND YOUNG
BECAUSE GUYS FROM ALLEN COUNTY COME IN HERE AND
TELLING PEOPLE WHEN THEY SEE ME THAT I'M IN PRISON
FOR A CRIME I DIDN'T COMMIT. AND THEY TRUST ME. BUT
I ALWAYS TELL THEM THAT THE WAY I WENT ABOUT
THINGS WERE WRONG. I LOST ALMOST ALL OF MY FAMILY AND
MY SON HAS CROSSED OVER THE GREAT LAKE TO THE AFTER
LIFE BECAUSE OF MY SO CALL HONOR. I WAS ONLY 17 YEARS
OLD. D. H. SHARON PATTERSON I SENT HER AN ORDER OF
RECALL BECAUSE I'M SAVING HER AND THAT SHE WOULD
BE AGAINST ME. SHE ALSO SAID YOU ALREADY SAVING
ME AND THIS ON. WHICH IS A VIOLATION OF MY DUE
PROCESS.

And D.H.D Sharon Patterson lied about receiving
my witness list. Because I put it in the mail box
And And officer said that she had to have it
Because the mail room would have placed it in
her box. This is the second time she's
said she didn't receive my witness list. That's
how they cover for each other through D.H.O and
GRIEVANCE. But I have them this time. Because I
my list of witness to Sgt. Cain that work stop. And
he will tell you himself that I gave him the
witness list. And I told Warden Anthony Padula in
Request to him about Sgt. Cain. So I could get a new
hearing to clear up these lies. But he knew that I
would and he knew that GRIEVANCE COORS would
support him. See Attached GRIEVANCES ALSO Lesia
Johnson sent GRIEVANCE to me that I had to have
back the next day. She thought she was sick
but I show them to officer L. Thompson and
the dates. I pray that this Honorable Court will
Rule in my favor as soon as possible in this matter.
I Am working on this with no law books. I pray
that you'll except my humble effort. God bless.
I declare under penalty of perjury that the fore
going is true and correct. Executed at Lee County
South Carolina on 6/1/10

Simethy Dism

- The threat of harm that I'll face is greater than the harm the prison officials will face if I get an injury now. I've been denied Medical Attention. I've been brutally Assaulted by defendant Lt. Franklin Richardson Jr. My Ribs were bruised badly. My Right Eye was suddenly closed the doctor said I had SCRAPE ON EYE itself and it was blood red this happened MARCH 11 2010 And it's still black. The Nurse said that I had REAL bad CONCUSSION. Also My KNEES were busted up Real badly. And the ARE MESS'ED UP. And I hadn't seen ANYONE to give me some- to take the PAIN AWAY. My Right eye the vision is still blurred. For weeks I had TERRIBLE OR EXTREMELY bad HEADACHES. They gave me NOTHING.

DAILY I put in Request to staff for sick call. I had to file A LAW SUIT to find out that they had let my Stomach get so bad until I got "two" 2 kinds of Ulcers. Now they don't want SEE ME OR give me Med. and Attention. Sometimes they Play GAMES with my Medicine for my stomach and I be in PAIN for days before I receive it. And I put in for it WEEK before it runs out. I've written the Warden AUTO PADD. And Deputy Warden Margaret Bell and filed GRIEVANCES LISA JOHNSON AND I wrote ASS. BRUCE DUBERMAN they won't RESPOND. Also I HAVE PROT Sending out my legal mail AND PERSONAL MAIL Mrs. SAN SIMON BRACEY. I've ORDER legal books for last two And received NONE Jennifer Livingston. And I have Problems get legal supplies.

The threat of harm that I'll face is greater than the harm the prison officials will face if I get an injunction.

I've been denied Medical Attention. I've been brutally Assaulted by defendant Lt. Franklin Richardson Jr.

My Ribs were bruised badly. My Right Eye was suddenly closed the doctor said I had SCRAPE ON EYE ITSELF AND it was blood red this happened MARCH 11 2010 And it's still black. The Nurse said that I had REAL bad CONCUSSION. Also My KNEES were busted up REAL badly. And they ARE MESS'ED UP. And I hadn't seen ANYONE to give me some- to take the PAIN AWAY. My Right eye the vision is still blurred. For weeks I had ~~terrible~~ OR extremely bad headaches. They gave me nothing.

Daily I put in Request to staff for sick call. I had to file a lawsuit to find out that they ~~had~~ let my Stomach get so bad until I got "two" 2 kinds of ulcers. Now they don't want see me or give me Medical Attention. Sometimes they play games with my Medicine for my stomach and I be in pain for days.

Before I receive it. And I put in for it a week before it runs out. I've written the Warden Anthony Padda. And Deputy Warden Margaret Bell and filed Grievances Lisa Johnson ~~And~~ I wrote ASS. BRUCE Oberman they won't respond. Also I have problems sending out my legal mail and personal mail Mrs. Sandra Simon Bracey. I've order legal books for last two months And received none Jennifer Livingston. And I have problems get legal supplies.

In The United States District Courts For The
District of South Carolina

Injunction ~~_____~~
Relief ORDER to show

Timothy Green # 113830

✓ Plaintiff

CAUSE
Civil 9:09-CV-03270-DCN-BM
Action

Warden Anthony Padula, Deputy, Warden Margaret Bell

Sgt. Bruce Oberman, Lt. Franklin Richardson Jr.

Major James L. Dean, Sgt. Frances Buchanan, Law Librarian

Jennifer Livingston, Sandra Simon Bracey, DHO Sharon Patterson

GRIEVANCE CORR. Lisa Johnson GRIEVANCE CORR. Catherine James.

Sgt. Cain-Davis

Defendants

LEE CORRECTIONS
Institution

Upon the Complaint, the supporting Affidavits of
Plaintiff, And the Memorandum of law submitted
herewith, it is: ORDER that defendants Above Plaintiff
will show this Honorable Court pursuant to Rule "65"
"A" of the Federal Rules of Civil Procedure enjoining
the defendants, and all other persons acting in concert
and participation with them, from engaging in illegal
actions or practice by defendants. unsafe extremely
harsh conditions. Assaulting brutality or harassment.
denied medical care or inadequate medical care.
Continuing violations of ~~any~~ Constitutional Rights..

(1) I will show at trial that the defendants violated
my Rights.

(2) I will suffer irreparable harm if I don't receive
an injunction. Irreparable harm Plaintiff receive
that can never be fixed.

The threat of harm that I'll face is greater than the harm the prison officials will face if I get an ~~injunction~~ ^{injunction}.

I've been denied Medical Attention. I've been brutally assaulted by defendant Lt. Franklin Richardson Jr.

My Ribs were bruised badly. My Right eye was swollen closed the doctor said I had SCRAPE ON eye itself and it was blood red this happened MARCH 11 2010 and it's still black. The Nurse said that I had REAL bad CONCUSSION. Also my KNEES were busted up REAL badly. And the ARE MESS'ED UP. And I hadn't seen ANYONE to give me something to take the PAIN AWAY. My Right eye the vision is still blurred. For weeks I had ~~terrible~~ OR extremely bad headaches. They gave me nothing.

Daily I put in Request to staff for sick call. I had to file a lawsuit to find out that they had let my stomach get so bad until I got "two" 2 kinds of ulcers.

Now they don't want SEE ME OR give me Medical Attention. Sometimes they play games with my medicine for my stomach and I'm in pain for days.

Before I receive it. And I put in for it a week

before it runs out. I've written the Warden Anthony Padua. And Deputy Warden Margaret Bell and filed

GRIEVANCES Lisa Johnson ~~And~~ I wrote ASS. BRUCE

Oberman they won't respond. Also I have problems sending out my legal mail AND personal mail Mrs. Sandra Simon Bracey. I've order legal books for last two months and received none Jennifer Livingston. And I have problems get legal supplies.

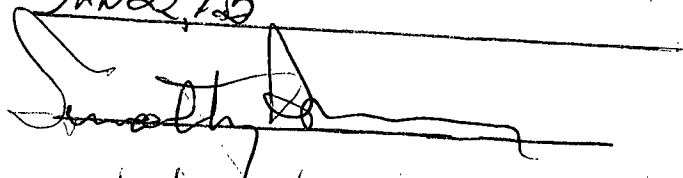
I'm requesting that this honorable court to transfer me to another institution for my life and safety.

I PRAY BECAUSE I WENT BEFORE THE D.H.O SHARON PATTERSON WHICH I FILED ASKING HER TO RECUSE HERSELF FROM HEARING MY CASE BECAUSE SHE'S ALREADY UPSET ABOUT MY LAWSUIT AGAINST HER. SHE DISREGARDED MY ORDER OF RECUSAL AND HEARD MY CASE. KNOWING THAT SHE'S VIOLATED MY RIGHTS TO A FAIR HEARING.

ALSO GRIEVANCE CORR. LISA JOHNSON WHOM I FILED AGAINST FOR MISCONDUCT IN HER OFFICE SEEMS TO WANT THwart MY EFFORTS AT JUSTICE.

ALSO SGT. PAUL AN OFFICER HERE AT LEE CORR. INST. KNOWS THAT I SENT IN MY WITNESS LIST AND THE WARDEN STILL DENIED ME DUE PROCESS TO HAVE MY WITNESSES TO TESTIFY TO THE TRUTH. I PRAY THAT THIS HONORABLE COURT TRANSFER ME IMMEDIATELY TO ANOTHER INSTITUTION FOR MY HEALTH AND SAFETY.

IT IS FURTHER ORDERED THAT THE ORDER TO SHOW CAUSE, AND ALL OTHER PAPERS ATTACHED TO THIS APPLICATION BE SERVED ON THE AFORESAID DEFENDANTS.

JAN 22, 15


United States District Judge

State of South Carolina
Court of Appeals

Timothy Green Plaintiff

v.

Exh. G

Motion Attaching Summary
Judgment & Requesting
A New Hearing on the facts.
C.A. NO.: 2011 CP-31-0187

Lt Franklin Richardson Jr. & S.C.D.C Medical staff

This matter comes before this Honorable Court Relating Summary
judgement in this Civil Action. Plaintiff states that he can
prove deliberate indifference. Plaintiff was beaten by Lt. Franklin
Richardson Jr. severely and placed on lockup in a corner
room where no one could see him. Plaintiff wrote
request to the investigator and Bishopville County lock
trying to get him arrested. Plaintiff "eye" right was
closed shot this whole right side of his face was
swollen. Plaintiff tried to get medical attention
the next day from Nurse Jones she wouldn't stop
and talk to him. He tried to talk to nurse
Trill and he wouldn't talk to him. That same
day of the incident Nurse Cooper told them

LEGAL MAIL ONLY

to bring me to her office. But they didn't. I told them that my throat and stomach was burning. They said nothing but gave tylenol pills. For months my throat was sore I blisters on my tongue as well. After being on lockup for about "6" months. I seen nurse Franklin and nurse Moody they looked down my throat and saw the Hinters. It's in the records at medical. I made sore it was documented. Nurse Practitioner ~~Rabon~~ Rabon treated me for my throat for about three & 3" months ago more.

My ribs was so sore and my knees you can see that something is badly wrong. And the vision in my right eyes is still blurred. Lt. Franklin Richardson Jr. stated he never hit me or anything but I have officers as witnesses and an inmate worker saw it all.

Lt. Richardson Jr. was slamming my head on the floor. I'll take a lie detector test. I been asking for one since day one. I seen the eye doctor at Kirkland on many occasions about my eye. the doctor stated in front of officer Lucky and of Mickens that I got beaten real good. And that I was being treated for a cut on my eyeball from

that beating. It is in Medical Record the badly swollen eye
with a cut on it. Deliberate indifference to serious
Medical Needs of prisoners constitutes the unnecessary
and wanton infliction of pain proscribed by the Eighth
Amendment. In order to prevail on a constitutional
claim of inadequate medical care. Nurse Corrie came
up to "S.M.U." lockup because Lt. Richardson Jr. sprayed
gas down my throat. And I told them that this man
sprayed gas down my throat. He always tried to treat
us like we were the lowest thing on this earth. But
I found out that he was a sex stripper. How could I
act out the way they stated when I had just come
off of a hunger strike. I went without food and water
for 19 days. But they had documented 12 days. They
said that we had to go 4 days before they could
document it. I lost 60 lbs. And I was to wear
to fight with these people or reside with them.
I lost so much weight that the guys on lockup
didn't recognize who I was. Everybody on this
yard will tell you Lt. Franklin Richardson Jr. assaulted
me.

LEGAL MAIL ONLY

Proof of deliberate indifference may be established by direct or by circumstantial evidence. Some of the types of direct evidence prisoners present sick call requests for medical attention or records reflecting.

1. The dates when medical attention was requested to whom the requests were submitted the medical conditions complained of the effects of any delay in obtaining access to medical staff.

the dates when access was provided.

Specific Medical staff seen.

Attorney Robert J. Butcher has the pictures of my face, my knees and my bruised ribs. Request that he send you a copy. When he showed my family the pictures they couldn't believe that an officer of the law could do such a thing.

treatment provided by particular staff. the nature of follow-up care ordered and whether it was carried out. Additional information to indicate the adequacy of treatment and complaints and formal grievances filed regarding the inadequate care. See grievances on medical staff.

The inadequate medical care, was the request to Jones
and Pruitt both nurse ignored plaintiff complaint about
wounds his eye ribs and knees. Which are still being
neglected. Plaintiff still suffers from chronic pains. Check
medical files. Plaintiff's toes feels like they are going
to break off. Medical prescribed medicine Plaintiff blood
pressure medicine for chronic headaches from his
head being slammed on the floor. Plaintiff don't even
have high blood pressure medicine that swell my shoulder
feet and legs with water. And took my sight. I thought
I was going to die. My lawyer I sent the medicine
to his office. The mailroom. Investigator and Constable
and the captain went inside my legal mail to my
attorney. Which is a violation of my Constitutional
Rights Attorney-Client Relations.
And he did nothing when I told him about it.
From the medicine I can't wear shoes anymore.
From the assault by Lt. Franklin Richardson Jr
I have pains in my eye + chronic headaches.
My Right Eye still has blackness around it.

My KNEES ARE still killing me. And they ARE still swollen.
My stomach is killing me. I have two "2" types of Ulcers
Now since he sprayed the gas down my throat.
Gastrol Ulcers and bleeding Ulcers. When Franklin
Richardson Jr. Jumped down in my side with
his KNEE AND started DUCK Plaintiff in his face.
All the officers ran into the shift office. Only
Officer FARMER picked me up off the floor. My
vision was blurred from the beating while
I was in handcuffs. I was weighing 146 lbs
down from 210 lbs. I was weak from the
hungerstrike. And in handcuffs what could
I do. My Mouth and stomach was on fire.
I couldn't eat for days afterwards I live
off of milk and bread. Ask SFC. Thompson.
My LAWYER NEVER got depositions from these
Critical witnesses. Estelle v Gamble 429 U.S. 97
103 (1976) West v. Atkins 487 U.S. 57-58 (1988)
Richardson v. McKnight 521 U.S. 399 (1997)
Estelle, 429 U.S. At 104 FARMER V. BRENNAN
511 U.S. 825, 836 (1994) 161

Id. At 843 Brady v. PUCKETT 157 F.3d 1022 (5th Cir
(1998) Brock v Wright 315 F.3d 158, 162 (2nd Cir 2003)

Hud 503 U.S. At 10, 109 S.Ct At 997, 1000 Riley v Dorton

Riley v. DORTON 115 F.3d 1159, 1168 (4th Cir 1997)

SPRAYING GAS down A PRISONERS throat is de minimis.

What is deliberate indifference? According to the
Supreme Court, deliberate indifference is a state of
Mind more blameworthy than mere negligence but
less culpable than purposeful misconduct. See Farmer

571 U.S. At 835. Deliberate indifference holds
that a prison official will be held liable under
the Eighth Amendment. Only if he knows that
inmates face a substantial risk of serious harm
and disregards that risk by failing to take
reasonable measures to abate it. Id. At 847

Under this test, prisoners alleging Eighth
Amendment violations need not show that a prison
official acted or failed to act believing that
harm actually would befall an inmate; it is enough
that the official acted or failed to act despite his
knowledge of a substantial risk of serious harm
Id. At 842.

I HAVE WITNESSES THAT WAS THERE AND HEARD NURSE COOPER TELL THE OFFICERS + LT. RICHARDSON JR. TO BRING TO MEDICAL AFTER THE ASSAULT. I CAN BLOW THIS CASE OUT OF THE WATER. AND THAT THEY PUT ME IN A CORNER ROOM TO ~~SE~~ AND HEAL BEFORE ANYONE KNEW ABOUT THE ASSAULT.

THE EIGHTH AMENDMENT REQUIRES THAT PRISON OFFICIALS PROVIDE A SYSTEM OF READY ACCESS TO ADEQUATE MEDICAL CARE.

PRISON OFFICIALS SHOW DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS IF PRISONERS ARE UNABLE TO MAKE THEIR MEDICAL PROBLEMS KNOWN TO THE MEDICAL STAFF OR IF THE STAFF IS NOT COMPETENT TO EXAMINE THE PRISONERS, DIAGNOSE ILLNESSES, AND THEN TREAT OR REFER THE PATIENT. THE PRISON MUST ALSO PROVIDE AN ADEQUATE SYSTEM FOR RESPONDING TO EMERGENCIES. IF OUTSIDE FACILITIES ARE TOO REMOTE OR TOO INACCESSIBLE TO HANDLE EMERGENCIES PROMPTLY AND ADEQUATELY, THEN THE PRISON MUST PROVIDE ADEQUATE FACILITIES AND STAFF TO HANDLE EMERGENCIES WITHIN PRISONS.

SEE IMAGE CARE & GRIEVANCES.

I KNOW THAT I AM SERIOUSLY SICK FROM THE WAY WE WERE BEING FED AND TREATED. ASK SENATOR RALPH ANDERSON.

Clement v. Gomez 298 F.3d 898, 904 (9th Cir 2002)

Greene v. Daley 414 F.3d 645, 653 (7th Cir 2005) Brock v.

Wright 315 F.3d 158, 163-64 (2nd Cir 2003) Clement v. Gomez

298 F.3d 898 (9th Cir 2002) Ellis v. Butler 890 F.2d 1001,

1003 (8th Cir 1989). Bouchard v. Magnusson 715 F. Supp. 1146,

1148 (D. Me 1989)

Lt. Richardson stated that I call him an escapee, while in a holding cell 4 feet wide and 4 feet long. Plaintiff only asked him what was he being locked up for? What he didn't realize that I wasn't one of the guys that allowed him to jump on me and wait for get back, knowing how corrupt the Administration is. I had to get a guy down stairs to contact my family and let them know what happened. 6 days later my niece contact Robert Butcher. He came up and took pictures of my wounds. There so many people that's been hurt by him and other officers. Most can't read or write. And they tell the guys that file grievances they are switching and fall for it.

Immunity in "NO" forms can be granted to him on summary judgement because the genuine issues of material fact existed precluding summary judgement, on whether prison guards complied South Carolina's official policy governing use of force when inmate has been restrained and

IN A HOLDING CELL. POLICY DOES NOT STATE THAT A PRISON OFFICIAL
CAN USE MACE OR GAS WHEN AN INMATE IS RESTRAIN AND BEHIND
DOORS. PLAINTIFF WAS NOT KICKING AND HANGING ON CELL DOOR.
PLAINTIFF STATES THAT HE HAS OFFICIALS WITNESSES THAT HIS LAWYER
WAS TOLD TO GET DEPOSITIONS FROM. PLAIN HAS A EXPERT WITNESS
STATEMENTS AND WITH OFFICERS PRESENT SAYING THAT HE WAS
PUNCHED IN THE EYE REPEATEDLY.

PLAINTIFF STATES THAT HE CAN PROVE COLORFUL PROOF ACERTAIN
PLAINTIFF, WHO ASSAULTS MALICIOUS AND SADISTIC USE OF FORCE
NEED NOT SHOW THAT FORCE CAUSED EXTREME DEPRIVATION OR
SERIOUS OR SIGNIFICANT PAIN OR INJURY TO ESTABLISH EIGHTH
AMENDMENT CAUSE OF ACTION. ALL THAT IS NECESSARY IS
PROOF OF MORE THAN DE MINORIS PAIN OR INJURY.

THIS IS PROOF THROUGH MATERIAL FACTS THE CAUSE OF INJURY
AND THAT LT. FRANKLIN RICHARDSON JR. DID BRUTALLY BEAT
INMATE TIMOTHY GREEN. ASK HIM TO TAKE A LIE DETECTOR
TEST THAT HE DIDN'T BEAT PLAINTIFF IN THE FACE. AND
SLAM HIS HEAD ON THE FLOOR AND DROP DOWN ON
PLAINTIFF SIDE. AND SPRAY GAS DOWN HIS THROAT AND
IT WASN'T PERSONAL. IF JASS I'LL DROP THIS CASE.

I KNOW JUST AS MOSES STOOD BEFORE THE BURNING
BUSH HE'LL FAIL. WILLIAMS V. BENJAMIN 77 F.3d 756. (4th
CIR. 1996).

There is a genuine issue of material fact is technically a question of law but its resolution depends on an assessment of the evidence submitted in support of the Plaintiff Johnson v Jones U.S. 115 S.Ct 2157, 132 W. Ed. 2d. 238 (1995) 115 S.Ct. At 2156-58

It occurs to the fact that Lt. Franklin Richardson Jr. by Acting out his personal feeling because of all the paperwork I was filing on him. Defendant hasn't enlightened this Court on the score of what's really going on.

See Grievances and that we were bringing heat on him and everyone else about the abuse and cruel and unusual punishment that was dealt out to us. Robert Butcher has the statements.

Scherz v. USAUPACA County, 875 F.2d 578, 583 (7th Cir. 1989). But misuse of official authority for private ends is a recurrent feature of cases in which a deprivation of life, liberty, or property without due process of law is found. Screws v. United States, 325 U.S. 91, 93, 111, 65 S.Ct. 1031, 1032, 1040, 89 L. Ed.

1495 (1945) Gibson v. City of Chicago 910 F.2d 1510, 1518 (7th Cir. 1990).

The distinction is between an act that is justifiable if considered without regard to the actor's motive

objectively justifiable, is explicable only in terms of the Actor's Motivation, as in a case of police brutality so egregious that it can be explained only by reference to a racist or other improper motive for the defendant officer's action.

INEFFECTIVE ASSISTANCE OF COUNSEL Attorney Misconduct. Attorney was told to file suit against Lt. Franklin Richardson Jr. and Medical at Lee County or the Medical Agency. See Affidavit of Records Custodian. Plaintiff states that his lawyer is a civil attorney & counsellor, a professional in his craft. There is no way possible that attorney could have filed suit against the department. Attorney violated Rule of Professional Conduct. Rules violated Rule 407, SCACR; Rule 1.1 failing to provide competent representation; Rule 1.2 failing to abide by a client's decisions concerning the objectives of representation and failing to consult with the client as to the means by which they are to be pursued; Rule 1.3 failing to act with reasonable diligence and promptness while representing a client; Rule 1.4 failure to keep a client reasonably informed about the status of a matter and failing to

Promptly Comply with Requests for information, Rule 1.7,
Rule 1.8, Rule 2.1 Rule 8.4 (A) 8.4(E).

Plaintiff Attorney should've known that Plaintiff
couldn't see S.C.D.C. BECAUSE Plaintiff told Mr.
Butcher when he went over his federal case
with him. Plaintiff states that he filed into
the Administrative Law Judge div. but never heard
from them. And was told that it was dismiss
because he didn't show where a liberty interest
was involved. Loss of good time visitation, ~~earn~~
work credits. Check Admin. Law Court Rules.

Plaintiff ~~states~~ states that summary judgment should
set aside to allow Plaintiff to present his
case before this Honorable Court.

Plaintiff states that with certainty that he can
show this Honor Court light within this case.
With solid material evidence, I pray this Honor
Court. I AM.

Sumather Dreen

LEGAL MAIL ONLY

(13)

EX27

Green, Timothy 113830 1 /

IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
803-462-3680

Name: Green, Timothy 113830
Patient ID: 1000038843
DOB: 02/14/1984

Acct#: 512431
Patient Phone #:

Exam Date: 03/19/2010
Exam: CT Head w and wo Contrast
Reason: head trauma, lost of memory,
headaches
Referrer: Lee CI, SCDC

CT SCAN OF THE HEAD WITHOUT AND WITH INTRAVENOUS CONTRAST

CLINICAL HISTORY: Head trauma.

TECHNIQUE: Contiguous 5 mm axial images were obtained before and after intravenous administration of 50 cc of Isovue 370. Additional 3 mm axial images through the orbits were obtained.

FINDINGS:

The ventricles and subarachnoid spaces are normal with no evidence of intracranial hemorrhage. There is a small ill-defined area of cortical atrophy probably due to chronic encephalomalacia within the superior posterolateral portion of the right frontal lobe, seen on axial unenhanced scans 26 and 27 and on contrast-enhanced images 63 and 64. No abnormal intracranial enhancement is noted. There is considerable soft tissue swelling over the right face, orbits, and frontal calvarium. No acute fractures are noted. An old fracture deformity of the right zygomatic arch is noted with medial bowing of the right zygomatic arch but without evidence of an acute fracture. The paranasal sinuses and temporal bones are well-pneumatized and clear. The craniocervical junction is normal anatomically.

IMPRESSION:

NO INTRACRANIAL HEMORRHAGE OR ACUTE FACIAL OR CALVARIAL FRACTURES ARE NOTED. AN OLD HEALED FRACTURE DEFORMITY OF THE RIGHT ZYGOMATIC ARCH IS NOTED. A SMALL AREA OF PROBABLE CHRONIC CORTICAL ENCEPHALOMALACIA AND ATROPHY OF THE SUPERIOR-POSTERIOR RIGHT FRONTAL LOBE IS NOTED. THERE IS EXTENSIVE SOFT TISSUE SWELLING OVER THE RIGHT FACE AND ORBIT WITH NO ACUTE FRACTURES.

Martin P. Dommers, M.D.
Electronic Signature
Date Finalized: 03/19/2010

DD: 03/19/2010 DT:03/19/2010

Exb. A

IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
803-462-3680

Name: Green, Timothy 113830
Patient ID: 1000038843
DOB: 02/14/1964
Acc#: 513505
Patient Phone #:

Exam Date: 03/18/2010
Exam: Orbits, complete 4 views
Reason:
Referrer: Lee CI, SCDC

DATE EXAM PERFORMED: 3-16-10

FACIAL BONES

CLINICAL HISTORY: Trauma right side of face.

FINDINGS:

AP, Waters and right orbital views were obtained. No evidence of right orbital or zygomatic fractures are identified. No other fractures are appreciated. The paranasal sinuses are clear.

IMPRESSION:

NORMAL.

W. J. Bayard, M.D.
Electronic Signature
Date Finalized: 03/22/2010

DD: 03/22/2010 DT:03/22/2010

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

Exh F

STEP 1

INMATE NAME: Timothy Green
SCDC NUMBER: 113230
INSTITUTION: LEE CORR INST.
HOUSING UNIT: KEOWHAW N. RM# 1254
WORK ASSIGNMENT: DORM

Grievance No. Lee Corr 10-12
Code: General ma/14
Policy ma/14
Disc. Hear. ma/14
Class. ma/14
PREA ma/14
Date Received 2/3/14
IGC Initials ma/14

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

ABOUT THIS MATTER TO THE WARDEN CECILIA REYNOLDS I WROTE
ON THE 4TH OF OCT. 2013 MY LEAD MAIL TO MY ATTORNEY WAS
BY INV. TISDALE, COO. PLEMONS AND AUTHORIZED BY LT. DURAN
CAPT. A. PINKNEY AND DIV. OF OPERATIONS DENNIS R. PATTERSON
INTER WARDEN CECILIA REYNOLDS D.H.O. SHARON PATTERSON. MA
OPERATORS WHICH VIOLATED MY ATTORNEY + CLIENT PRIVILEGES. SINCE
ENVELOPE WAS ADDRESSED TO HIS ATTORNEY AND HIS CLIENT ~~STATION~~
WAS ON IT. THIS SHOULD'VE BEEN NOTIFIED AS WELL AS HIS CLIE
AND OPENED IN THE FRONT OF THEM. INMATE TIMOTHY GREEN
REQUESTED THE ENVELOPE + LETTER + STATEMENTS BE BROUGHT BEF
THEM D.H.O. IT SEEMS AS THOUGH IT CAN'T BE FOUND NO
AS WELL AS LEGAL LETTERS TO HIS ATTORNEY. SEE INCIDENT RECD
13-10-045 #19 AND D.H.O. TAPE. SEE ATTACHED FOR RULES
VIOLATIONS CONST. RIGHTS 14TH

ACTION REQUESTED:

STATEMENTS I SENT A COPY OF THIS TO MY LAWYER. I NEED
SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:
I WROTE THE WARDEN 10-12-13 I SPOKE TO MAJOR AND
WARDEN DEAN.
Grievant Signature Timothy Green 2/3/14

(CONTINUE ON REVERSE SIDE)

Exh. #

#79

KRM 1254

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

INCIDENT REPORT

NM4

13-10-045

Page 1 of 1

Institution/Center: Lee CI				
Date of Report: 4 Oct 2013			Time of Report: Approx 12:30 PM	
Reporting Official: CIO Plemons			Date of Incident: 4 Oct 2013	
Location of Incident: Contraband			Time of Incident: Approx 11:30 AM	
Inmate(s)/Resident:	SCDC#	Age	Race	Sex
1. Green, Timothy	113830			
2.				
3.				
4.				
5.				
Employee(s) Involved:				
1. Inv. Tisdale				
2. LPN Dixon				
3.				
4.				
5.				

On the above date and approximate time: I, CIO Plemons received an envelope from Inv. Tisdale that was returned to the mail room unavailable to be delivered. Inside was two SCDC medical envelopes for IIM Green, Timothy # 113830. LPN Dixon was asked and determined that the medication was prescribed to IIM Green and were the medication that was on the label. IIM Green will be charged being that he was not taking the medication as he was prescribed.

IIM Green, Timothy # 113830 is charged with 903. The Trafficking Use, and/or Possession of Narcotics, Marijuana, or Unanthered Drugs including Prescription Drugs or Inhalants.

RECEIVED

OCT 07 2013

Signature: CIO R Piny # 026827

LEECI MAJOR'S OFFICE

Evidence: (1) Envelope returned (2) SCDC Med Packs with Meds

10/11/13

Witness(es): INV Tisdale, LPN Dixon

Supervisor's Comments: Refer to DHO

Signature: [Signature] Title: [Signature] Date/Time: 10/4/13

Major/Responsible Authority:

903

Signature: A. Piny Title: Capt. Date: 10-7-13

STG Related - Refer to STG Committee		
() Yes	() No	() Unknown
This Incident is DRUG related		
() Yes	() No	() Unknown
Action Taken		
() Informal Resolution		
() Administrative Resolution		
(X) Refer to Disciplinary Hearing		

Exh AA

IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
803-462-3680

Name: Green, Timothy 113830
Patient ID: 1000038843
DOB: 02/14/1964
Acc#: 513505
Patient Phone #:

Exam Date: 03/18/2010
Exam: Orbits, complete 4 views
Reason:
Referrer: Lee Cl, SCDC

DATE EXAM PERFORMED: 3-16-10

FACIAL BONES

CLINICAL HISTORY: Trauma right side of face.

FINDINGS:

AP, Waters and right orbital views were obtained. No evidence of right orbital or zygomatic fractures are identified. No other fractures are appreciated. The paranasal sinuses are clear.

IMPRESSION:

NORMAL.

W. J. Bayard, M.D.
Electronic Signature
Date Finalized: 03/22/2010

DD: 03/22/2010 DT:03/22/2010

ex28

IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
803-462-3680

Name: Green, Timothy 113830
 Patient ID: 1000038843
 DOB: 02/14/1964

Exam Date: 03/19/2010
 Exam: CT Head w and wo Contrast
 Reason: head trauma, lost of memory, headaches
 Referrer: Lee CI, SCDC

Acct#: 513431
 Patient Phone #:

CT SCAN OF THE HEAD WITHOUT AND WITH INTRAVENOUS CONTRAST

CLINICAL HISTORY: Head trauma.

TECHNIQUE: Contiguous 5 mm axial images were obtained before and after intravenous administration of 50 cc of Isovue 370. Additional 3 mm axial images through the orbits were obtained.

FINDINGS:

The ventricles and subarachnoid spaces are normal with no evidence of intracranial hemorrhage. There is a small ill-defined area of cortical atrophy probably due to chronic encephalomalacia within the superior posterolateral portion of the right frontal lobe, seen on axial unenhanced scans 26 and 27 and on contrast-enhanced images 63 and 64. No abnormal intracranial enhancement is noted. There is considerable soft tissue swelling over the right face, orbits, and frontal calvarium. No acute fractures are noted. An old fracture deformity of the right zygomatic arch is noted with medial bowing of the right zygomatic arch but without evidence of an acute fracture. The paranasal sinuses and temporal bones are well-pneumatized and clear. The craniocervical junction is normal anatomically.

IMPRESSION:

NO INTRACRANIAL HEMORRHAGE OR ACUTE FACIAL OR CALVARIAL FRACTURES ARE NOTED. AN OLD HEALED FRACTURE DEFORMITY OF THE RIGHT ZYGOMATIC ARCH IS NOTED. A SMALL AREA OF PROBABLE CHRONIC CORTICAL ENCEPHALOMALACIA AND ATROPHY OF THE SUPERIOR-POSTERIOR RIGHT FRONTAL LOBE IS NOTED. THERE IS EXTENSIVE SOFT TISSUE SWELLING OVER THE RIGHT FACE AND ORBIT WITH NO ACUTE FRACTURES.

Martin P. Dommers, M.D.
 Electronic Signature
 Date Finalized: 03/19/2010

DD: 03/19/2010 DT:03/19/2010

Exh. H (1)SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy F. Green
 SCDC NUMBER: # 113830
 INSTITUTION: LEE CORX. INST
 HOUSING UNIT: CD 3ND SOUTH RM #167
 WORK ASSIGNMENT: —

Office Use Only
 Grievance No. Lee CI#0754-10
 Code: General ext
 Policy —
 Disc. Hear. —
 Class. —
 Date Received 3/10/10
 IGC Initials LG

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

ON 3/11/10
 I WAS ASSAULTED BY LT. RICHARDSON THE GUY GASED ME AND JUMPED ME WITH THE HANDCUFFS ON. AND BUSTED MY EYE AND CRACKED MY RIBS. AND PUNCH ME A FEW TIMES IN THE FACE. AND NO ONE WILL GET ME MEDICAL ATTENTION. THIS OFFICER ASSAULTED ME AND BUSTED MY EYE AND CRACKED MY RIBS. BY KNEEING ME IN MY RIBS.

ACTION REQUESTED:

I WANT file charges on this man.
LT. RICHARDSON.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I'm ASKING this man ~~to be released~~ why am i being locked up. When the whole top tier was screaming at him. The lunch can at 10:40 he didn't pass it out until 2:30. And my food had gotten old.

Grievant Signature

Date

ACTION TAKEN BY IGC:

When an inmate is involved in an incident that results in a disciplinary, that issue/complaint becomes non-grievable. Therefore, this complaint is being closed without a decision on its merit. Once you have been to your disciplinary hearing and if you feel that there were technical/procedural errors regarding your hearing, you may submit a grievance at that time.

☒ accept the action taken by the IGC and consider the matter closed.
☐ do not accept the action taken and wish to appeal.

L. Jones - 3/10/10
 IGC Signature Date

Grievant Signature

Date

Exh. H (2)

**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM
STEP 1**

INMATE NAME: Timothy F. Green
 SCDC NUMBER: 113830
 INSTITUTION: LEE CORR. INST.
 HOUSING UNIT: SMU South RM# 167 **MAR 19 2010**
 WORK ASSIGNMENT: _____

Office Use Only
 Grievance No. Lee CI 0828-10
 Code: General ep
 Policy _____
 Disc. Hear. _____
 Class. _____
 Date Received 3/22/10
 IGC Initials EP

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy indicate which policy)

ON the 3/11/10 I Timothy F. Green #113830 WAS ASSAULTED by Lt. F. Richardson
 A BEATEN, MY EYE IS RED BLACK AND BLUE AND SWOLLEN shut. My Ribs are Messed
 UP REAL badly. My KNEES ARE SWOLLEN REALLY badly. And my ribs are broken
 IN them and they ARE SWOLLEN AS WELL. I'm losing sight in my right eye
 I'm having very bad HEADACHES Aches really bad. The nurse said: probably
 HAVE A CONCUSSION BECAUSE MY HEAD WAS SLAMMED ON THE FLOOR AND POUNCED
 IN THE FACE. AND KNEED IN MY RIBS HARD VERY HARD.

ACTION REQUESTED:

THAT THIS OFFICE BE CHARGE WITH ASSAULT AND BATTERY
 WITH HIGH AND AGGRAVATED NATURE

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I tried to talk with everybody above would listen I didn't
 get medical treatment until the following week so my mind is on
 headaches are killing and I haven't seen a doctor yet
Timothy F. Green 3/11/10
 Grievant Signature Date

ACTION TAKEN BY IGC:

This is a duplicate of grievance LEE CI #0754-10, filed on 03/12/10. This
 grievance is being returned to you with no action taken.

☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

R. Johnson 3/22/10
 IGC Signature Date

 Grievant Signature Date

Exh. H (3)**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM****STEP 1**

INMATE NAME: Timothy F. Green
 SCDC NUMBER: 113830
 INSTITUTION: LEE CORR INST.
 HOUSING UNIT: S.M.U. South Rm #167
 WORK ASSIGNMENT: _____

Office Use Only
 Grievance No. Lee CT 0873-10
 Code: General _____
 Policy _____
 Disc. Hear. ☒ _____
 Class. _____
 Date Received 3/25/10
 IGC Initials _____

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

3/23/10 I WENT before the D.H.O. Sharon Patterson and my witnesses hadnt
 BEEN NOTIFIED ALL SPOKEN WITH OR GOTTEN STATEMENTS FROM. I PUT A list in
 the mail to the D.H.O. Sharon Patterson for second time she didn't
 Recieve them. And put it in the same day i got the charges. This cant
 be happening because the Request was to the D.H.O. in large writing
 she convicted me on Lt. F. Richardson statements without my witnesses.
 This WAS done to UNDERMINE MY CASE. Also you couldn't tell me what

ACTION REQUESTED: lying, through the entire hearing.

I won't ever forgive this. That my case be REVERSE for a new hearing to
 104. PROVE this guy is a liar. This man tried to bust my head open. I want to
 PRESS CRIMINAL CHARGES on him ASALT and BATTIE with intent kill.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

We went before the hearing I was praying that he would tell the truth but he
 Now is going to push this to the high extent of the law. This man slam my head
 on the floor hard a few times. And punch me in my face. And Kneel me in my side
 I think he cracked my ribs. And he slam me in handcuffs.
 And SPRAWLED gas in my mouth i can't even taste anyone. I don't see probability as a

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed. It is noted you appeared before the
 DHO on 03/23/10 for several charges but in your Step 1 Grievance you have not
 provided a specific charge to which one you are appealing. You have five (5) days to
 correct by resubmitting a new grievance form rewritten and received no later than
 03/30/09. This unprocessed complaint should be attached for date verification. If not
 received by the date requested the issue will be closed.

☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

L. John 3/25/10
 IGC Signature Date

 Grievant Signature Date

Exh. H (4)

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM
STEP 1

INMATE NAME: Timothy F. Green
SCDC NUMBER: 113830
INSTITUTION: LEE CORR. INST.
HOUSING UNIT: SMU South Unit #167 MAR 31 2010
WORK ASSIGNMENT: _____

Office Use Only
Grievance No. LEE CI 0947-10
Code: General _____
Policy _____
Disc. Hear. ☒ _____
Class. _____
Date Received 4/2/10
IGC Initials [Signature]

809-B07-B18-025

ON ALL THE CHARGES THIS MAN HAS BROUGHT AGAINST ME HOW DO I GET THESE CHARGES I'VE NEVER PUT MY HANDS ON A OFFICER SINCE I BEEN DOING TIME. OR SPOT ON ANYONE. BUT I HAVE KNOBS OVER MY EYE ON THE SIDE MY HEAD ON MY CHEEK ON THE RIGHT SIDE. MY RIBS WAS SWOLLEN AND CRUSHED ON LEFT SIDE WHERE HE JUMP MY SIDE WITH KNEE. BOTH MY KNEES ARE BUSTED UP. AND MY TONGUE IS RAW + THE GARS. ASK SGT. PRICE DID USE PROFANITY ASK HIM HE WAS RIGHT THERE. TELL YOU TO SEE HOW THIS GUY LT. RICHARDSON TELLS LIES. ASK OFC CAIN IN CHESTERFIELD NOW I DON'T REMEMBER HIM. OFFICER CAIN WALK ON THE LOCK. REFUSED AND NOW HEARING. I SENT MY WITNESS LIST IN ON TIME. AND I GAVE THE SECOND WITNESS LIST TO OFFICER CAIN THAT WORKS UP HERE. THAT LADY IS LYING ABOUT SHE DIDN'T GET MY WITNESS LIST AND QUESTIONS I PUT THEM IN THE SAME DAY I GOT THE CHARGES.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

D.H.O said she didn't get my witness list but medical got the request to staff the investigator got his and you got all the grievances.

THIS IS A VIOLATION OF DUE PROCESS AND EQUAL PROTECTION. VIOLATION POLICY AND CONSTITUTIONAL RIGHTS.

ACTION TAKEN BY IGC:

[Signature] 3/28/10
Grievant Signature Date

This is a duplicate of grievance LEE CI #0946-10, filed on 03/16/10. This grievance is being returned to you with no action taken.

☐ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

[Signature] 4/5/10
IGC Signature Date

[Signature]
Grievant Signature

Date

EXA. H (5)SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy Green
 SCDC NUMBER: 113830
 INSTITUTION: LEE CORP. INST.
 HOUSING UNIT: SMU SOUTH RM #167
 WORK ASSIGNMENT: _____

Office Use Only
 Grievance No. Lee CI #0800-10
 Code: General ue
 Policy _____
 Disc. Hear. _____
 Class. _____
 Date Received 3/17/10
 IGC Initials JS

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate incident)

Monday ON 3/15/10 I
 went on a hunger strike because i was denied medical treatment and
 this is my 5 day up here. I WAS ASSAULTED BY Lt. Richardson. My eye is
 busted up and my ribs ARE broken or crack. Sgt. WOKY has denied
 me my diet tray and denied to feed me. so I'm going on a hunger
 strike until my legal fee is bought to me and Quran religious books
 and my medication. And get all my legal documents out of my box
 as well as soap and stuff.

ACTION REQUESTED:

That i get the investigator to take pictures
of my eye and ribs which is black and red.
I would like to press charges of Assault on Lt. Ric

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I've spoken with every officer that works on SMU and i can't
seem to see medical or get to my property to get encounter
with my people.

Grievant Signature

Date

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed for the following reasons. You have filed more than (1) one issue on this form. The back of the form specifically states "only one (1) issue is to be addressed on each form". Additionally, your informal resolution attempt is insufficient. You have five (5) days to correct and resubmit this grievance by submitting a new grievance form to the grievance office by 03/26/10. If not received by this date, this issue will be closed. Return this form with your corrected grievance for date verification.

- ☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

IGC Signature

Date

Grievant Signature

Date

Exh. H (6)SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORMDue Date:
11-9-10

STEP 1

INMATE NAME: Timothy GreenSCDC NUMBER: 113B36INSTITUTION: LEE CORR INST.HOUSING UNIT: Chesterfield North on #205WORK ASSIGNMENT: DOCT 04 2010

Office Use Only

Grievance No. LECT 2711-1Code: General me

Policy _____

Disc. Hear. _____

Class. _____

Date Received 10/5/10IGC Initials PG

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

I've filed numerous Request regarding my KNEES. They are killing me. I filed another Request to sick call + Ms Rabon on 9/10/10. About my KNEES I've seen by Ms. Rabon she told me that I needed reconstructive knee surgery. I've filed request on 9/18/10 9/19/10 9/20/10 9/21/10 9/14/10. As well. I've seen nobody Ms Rabon said that I'll see the Orthopedic Doctor. I've been filing Request about the pain and swelling nothing I've been neglected. This deliberate indifference. I'm being neglected here this is deliberate indifference to see the Orthopedic Doctor and have something done about this pain it's driving me crazy.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I've written numerous Request to sick call and to Ms Rabon about my KNEES nothing has happen. check with it request and this is deliberate indifference. 9/10/10 9/18/10 9/19/10 9/20/10 9/21/10 9/14/10
 Timothy Green 9/22/10
 Grievant Signature Date

ACTION TAKEN BY IGC:

IGC conferred with Nurse Rabon and reviewed pertinent documentation. See Warden's response.

- ☐ accept the action taken by the IGC and consider the matter closed.
☐ do not accept the action taken and wish to appeal.

[Signature] 10/22/10
 IGC Signature Date

Grievant Signature Date

Exh. H (7)**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM****STEP 1**

INMATE NAME: Timothy Green
 SCDC NUMBER: 113830
 INSTITUTION: LEE CORA INST. SEP 23 2010
 HOUSING UNIT: A.S.U. South RM# 167
 WORK ASSIGNMENT: _____

Office Use Only
 Grievance No. Lee CT 2641-10
 Code: General ma
 Policy _____
 Disc. Hear. _____
 Class. _____
 Date Received 9/27/10
 IGC Initials lg

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

I've filed another Request regarding my knees. They are killing me. I filed another Request to sick call & Ms. Rahon on 9/10/10. About my knees I was sent to Ms. Rahon she told me that I needed reconstructive knee surgery. I've filed Request on 9/18/10 9/19/10 9/20/10 9/19/10 9/14/10 ASU I've seen nobody Ms. Rahon said I'll see orthopedic Doctor. I've been filing Request about the pain and swelling nothing.

ACTION REQUESTED:

TO SEE THE ORTHOPEDIC DOCTOR ABOUT MY KNEES. THE OFFICERS AND NURSES HAVE SEEN THEM AND MY REQUESTS TO SICK CALL SHOWS THAT I'VE BEEN NEGLECTED THIS IS DELIBERATE INDIFFERENCE IN THIS MATTER.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I'VE WRITTEN NUMEROUS REQUEST TO SICK CALL AND TO MS. RAHON NOTHING HAS HAPPENED. CHECK IN TO MY REQUEST AND RECORD THIS IS DELIBERATE INDIFFERENCE. I'm in pain daily here.

Timothy Green 9/22/10
 Grievant Signature Date

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed. The attempt of informal resolution on your part is insufficient. If you wish to resubmit a grievance on this issue it has to be received no later than 10/03/10. Please attach this grievance with the new grievance for date verification. If not received by 10/03/10 this issue will be closed. This grievance is being returned to you with no action taken.

☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

L. Johns 9/27/10
 IGC Signature Date

 Grievant Signature Date

Exh. H(8)

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

INMATE GRIEVANCE FORM

STEP 2

INMATE NAME: Timothy Green NOV 18 2010
 SCDC NUMBER: 113830
 INSTITUTION: Lee Ct
 HOUSING UNIT: Chw 21057 NOV 08 2010
 WORK ASSIGNMENT: _____

Office Use Only
 Grievance No. Lee C72711
 Code: General ma
 Policy _____
 Disc. Hear. _____
 Class. _____
 Date Received 11/19/10
 IGC Initials EG

INMATE'S REASON FOR APPEAL (state specific dissatisfaction):

I've been in pain since MARCH 11, 2010. My knee has been killing me. Even the nurse practitioner said that I needed reconstructed knee surgery. My knees swell up and gives me serious problems when I do a lot of moving around. The Dr. Moore is neglecting me and my serious situation. This is deliberate indifference. And the negligence of my health and my life.

Timothy Green 11/19/10
 Grievant Signature Date

RESPONSIBLE OFFICIAL'S DECISION AND REASON:

I have reviewed your medical encounters and grievance. Your knee was x-rayed in 2008 and 2010. You have been seen at sick call multiple times. Your health care has been adequate and fair. I see no indifference, therefore your grievance is denied. Lee 2711-10

You may appeal this decision under the Administrative Procedures Act to the Administrative Law Court. In order to appeal, you must fill out the attached Notice of Appeal Form and submit it as instructed on the form within 30 days of receipt.

Joe GMP 2/9/11
 Signature Date

The decision rendered by the responsible official exhausts the appeal process of the Inmate Grievance Procedure. I hereby acknowledge receipt of the official's response and understand this is the Agency's final response to this matter.

Timothy Green 2/24/11
 Grievant Signature Date

C. Jones 2/24/11
 IGC Signature Date

(SEE REVERSE SIDE FOR INSTRUCTIONS)

Exh. H (9)

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM
STEP 1

INMATE NAME: Timothy Green
 SCDC NUMBER: 113830
 INSTITUTION: L & C CORP. INST.
 HOUSING UNIT: A.S.U. South RM # 167
 WORK ASSIGNMENT: _____

SEP 16 2010

Office Use Only
 Grievance No. LECT 2593
 Code: General me
 Policy _____
 Disc. Hear. _____
 Class. _____
 Date Received 9/20/10
 IGC Initials [Signature]

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy indicate which policy) I've filed w/
Regarding my KNEES. THEY ARE KILLING ME. I filed Another 9/10/10
About my Knees Ms. Rabon told me that I needed Reconstructive Ki
Surgery. I've been advised to file this grievance on Medical M
has been busted up since 3/11/2010. And I haven't seen the Orth
Doctor. I've been advised file grievance's on all Medical conditions
As a matter Records.

ACTION REQUESTED:

To see the Orthopedic Doctor about my knees
the officers and nurses and my requests to sick stops that it's
needed. This is deliberate indifference in the matter of my Medical condi

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I've written request numerous request to sick call and Ms Rabon
About this situation. Please, Push this grievance forward
Investigate I've sent numerous requests to sick call and Ms. Rabon.
check it out, I'm in pain daily

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed for the following reasons. You have exceeded the appropriate time frame to file this grievance. According to Policy/Procedure GA-01.12, you have (15) fifteen days from the date of the incident to file a grievance. Additionally, your informal resolution attempt is insufficient. This grievance is being returned to you with no action taken.

- ☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

SCDC 10-5 (Rev. November 1997)

(CONTINUED ON REVERSE SIDE)

IGC Signature

Date

Grievant Signature

Date

INMATE NAME: Timothy Green
SCDC NUMBER: 113830
INSTITUTION: Lee Corp. Inst.
HOUSING UNIT: Darlington 5, 1246
WORK ASSIGNMENT: FEB

Office Use Only
Grievance No. WECT 0364
Code: General me/ll
Policy _____
Disc. Hear. _____
Class. _____
Date Received 5/2/13/v
IGC Initials [Signature]

NUMEROUS REQUEST FOR SICK CALL. I HAVE NOT SEEN ANYONE YET. MY KNEES AND STOMACH IS KILLING ME. I AM HAVING PAINS IN MY CHEST AND STOMACH AND MY KNEES I CAN'T REST AT NIGHT.

That I get the medical attention
that's need.

... I wrote as ~~domestic~~ Request to Ms. Rabon and stick call. I sent a request to ~~uncler~~ Brooks.

ACTION TAKEN BY IGC: _____ Grievant Signature _____ Date 1-2

Your grievance is being returned to you unprocessed because you did not follow instructions that were given to you on Lee CI #0245-12, which was returned to you unprocessed on 01/31/12. Your grievance is being returned to you with no action taken.

L. Johnson 2/12/12
IGC Signature Date

SCDC 10.5 (Rev. November 1997)

(CONTINUED ON REVERSE SIDE)

Exh. H (11)SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy Green
 SCDC NUMBER: U3830
 INSTITUTION: LEE CORRI INST.
 HOUSING UNIT: DARLINGTON S. 1246 JAN 30 2012
 WORK ASSIGNMENT: Dr

Office Use Only
 Grievance No. Lee CT 024
 Code: General ne/chl
 Policy _____
 Disc. Hear. _____
 Class. _____
 Date Received 1/31/12
 IGC Initials LG

STATE GRIEVANCE (Include documentation, and date of incident; if SCDC Policy, indicate which policy)

I've written
 Numerous Request for sick call. I hadn't seen
 anyone yet. My knees and stomach is killing me.
 I'm having pains in my chest and stomach and
 my knees I can't rest at night.

ACTION REQUESTED:

That I get the medical attention
 that's needed.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

Written Numerous Request to Ms Robb
 And Sick Call.

Grievant Signature

Date

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed because you have failed to state a specific date of the allege incident. You have not provided a specific date as to when you submitted numerous request for sick call. Your grievance is also being returned because your informal resolution attempt is insufficient. An informal resolution attempt must be made with the appropriate supervisor. I suggest that you submit a request to staff to Nurse McDonald to address your concerns due to the fact medical falls under her area of supervision. You have five (5) days to correct and resubmit this grievance by submitting a new grievance form to the grievance office by 02/07/12. If not received by this date, this issue will be closed. Return this form with your corrected grievance for date verification.

- ☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

IGC Signature

Date

Grievant Signature

Date

Exh. H (12)SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM
STEP 1INMATE NAME: Timothy Green
SCDC NUMBER: 113830
INSTITUTION: LEE CORR. INST. JAN 06 2010
HOUSING UNIT: Chesterfield North Rm#2110 DP
WORK ASSIGNMENT: _____Office Use Only
Grievance No. LEE CI 0050
Code: General me
Policy _____
Disc. Hear. _____
Class. _____
Date Received 1/7/10
IGC Initials SG

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

EVERY SINCE I'VE BEEN DOWN HERE THESE OFFICERS HAS BEEN SPRAYIN GAS ON THE WING. I HAD SURGERY ON MY VOCAL CORD AREA OF MY THROAT THAT GAS TAKE AWAY MY VOICE. AND WHEN I COUGH IT HURTS MY THROAT AND MAKES IT REALLY SORE. RIGHT NOW MY THROAT IS SO VERY SORE I CAN HARDLY SWALLOW.

ACTION REQUESTED:

TO BE REMOVED FROM THIS SIDE OF THE UNIT.
AND SENT TO GET MY THROAT CHECK OUT
FOR DAMAGES.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I SPOKE WITH THE LT. OF THE UNIT &
HE SAID NOTHING. I SPOKE WITH MAJOR DEN
AND LT. BRINSON ABOUT THIS MATTER.

Timothy Green 1-7-10
Grievant Signature Date

ACTION TAKEN BY IGC:

This is a duplicate of grievance LEE CI #0018-10, filed on 12/29/09. This grievance is being returned to you with no action taken.

☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

SCDC 10-5 (Rev. November 1997)

(CONTINUED ON REVERSE SIDE)

L. John 1-7-10
IGC Signature Date

Grievant Signature Date

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

Timothy Green, # 113830,

C/A: No. 6:14-cv-2595-MGL-KFM

Plaintiff,

v.

Lt. Franklin Richardson, et al.,

Defendants.

CERTIFICATE OF SERVICE

I certify that a copy of Defendants' Motion for Summary Judgment and Memorandum in Support in the above referenced matter has this date been served upon the Plaintiff *pro se* by depositing a copy of same in the United States mail with first class postage affixed thereon, addressed as follows:

Timothy Green, # 113830
Broad River Correctional Institution
Wateree Unit Room # 123
4460 Broad River Road
Columbia, SC 29210

s/G. Murrell Smith, Jr.

January 21, 2015

SCI880D
INMDCA

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
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09/19/14
C055948

SCDC# 113830 GREEN, TIMOTHY F.

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SIGNED OFF ON 02/22/14 @ 18:28 BY CHARLES E AYERS JR, UNCLASSIFIED

** ENCOUNTER: 504 SICK CALL 01/23/14 13:18 LEE COMP
S> INMATE REPORTED TO MEDICAL WITH C/O CONTINUED FEET PAIN AND SWELLING. INMATE STATES WAS TOLD BY ORTHOPEDIC DOCTOR WOULD BE GOING TO HAVE SHOES MADE. INMATE STATES WAS ALSO TOLD HE HAD SPURS IN FEET.

O> TEMP=99.0 PULSE= 90 RESP=20 BP=130/ 74 WEIGHT=190 O2 SAT= 0
INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING. SKIN WARM AND DRY. COLOR WNL. INMATE HAS NO ERYTHEMA OR EDEMA TO FEET OR LOWER LEGS BILATERALLY. CAPILLARY REFILL <3 SECONDS. FULL ROM IN LEGS AND FEET.

A> MD CLINIC.

P> PER INMATE AMR, INMATE HAS BEEN DISAPPROVED FOR CAPITAL PROSTHETICS. INMATE INSTRUCTED WILL ADD TO MD CLINIC LIST(SCHEDULER NOTIFIED) TO DISCUSS TREATMENT OPTIONS. INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 01/23/14 @ 13:23 BY WANDA K FULTON, REGISTERED NURSE II

** ENCOUNTER: 503 NARRATIVE 01/09/14 13:20 LEE COMP
WHILE CHECKING I/M IN DORM I/M STATED THAT HIS FEET AND ANKLES WERE SWOLLEN I/M TOOK SHOES AND SOCKS OFF. NO SWELLING NOTED. I/M STATES HIS FEET ARE IN PAIN. REQUESTED THAT I REFILL HIS ALLOPURINOL. WILL REFILL THAT. I/M ALSO STATED THAT HE WAS SUPPOSED TO BE GOING TO GET NEW SHOES. AWAITING APPROVAL FOR CAPITAL PROSTHETICS.

SIGNED OFF ON 01/09/14 @ 13:22 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE

** ENCOUNTER: 502 NARRATIVE 01/09/14 13:11 LEE COMP
MS. ROGERS, LPN STATED THAT SHE OBSERVED INMATE UP WALKING AROUND WHEN SHE PASSED MEDICATION TO ROOMMATE AND NO SWELLING WAS OBSERVED. ALSO INMATE DID NOT MENTION ANY COMPLAINTS TO HER.

SIGNED OFF ON 01/09/14 @ 13:12 BY GWENDOLYN T STOKES, NURSE ADMINISTRATOR/MGR

** ENCOUNTER: 501 TELEPHONE ENCOUNTER 01/08/14 16:17 LEE COMP
INMATE'S MOTHER MARY KNOX (803-648-4005) CALLED COMPLAINING THAT HER SON WAS SWELLING BAD AND NEEDED MEDICAL ATTENTION. NO ROI ON FILE. ADVISED MS. KNOX THAT WE WILL ADDRESS ON HER CONCERN. NOTE: INMATE IS ON GOUT MEDICATION. WILL ASK PHARMACY NURSES TO LOOK AT INMATE ON MEDICATION PASS

SIGNED OFF ON 01/08/14 @ 16:20 BY GWENDOLYN T STOKES, NURSE ADMINISTRATOR/MGR

** ENCOUNTER: 500 NARRATIVE 12/16/13 10:32 LEE COMP
CONSULT FOR CAPITAL PROSTHETICS WAS NOT APPROVED.
SIGNED OFF ON 12/16/13 @ 10:33 BY MARLENE D BOYKIN, ADMINISTRATIVE ASSISTANT
SIGNED OFF ON 12/16/13 @ 16:03 BY RUFUS L NEVILLE JR, UNCLASSIFIED
SIGNED OFF ON 12/17/13 @ 7:41 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE

** ENCOUNTER: 499 SICK CALL 12/11/13 9:31 LEE COMP
S> INMATE TO MEDICAL WITH C/O "MY FEET ARE SWELLING, I CANT GET MY SHOES ON, MY KNEES IS KILLING ME AND I HAVE A REAL BAD CASE OF JOCK ITCH. MY ORTHOPEDIC DOCTOR SAY IM SUPPOSE TO HAVE ORTHOPEDIC SHOES". (CONSULT HAS BEEN INITIATED ALREADY)

Exh. GMDCI880D
INMDCASOUTH CAROLINA DEPARTMENT OF CORRECTIONS
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SIGNED OFF ON 08/15/14 @ 9:12 BY MARLENE D BOYKIN, ADMINISTRATIVE ASSISTANT

** ENCOUNTER: 514 DOCTOR'S CLINIC 08/12/14 14:24 LEE COMP
F/U IN CLINIC IN 2 WEEKS.
SIGNED OFF ON 08/12/14 @ 14:26 BY RUFUS L NEVILLE JR, UNCLASSIFIED
PLACED ON SCHEDULING LIST
SIGNED OFF ON 08/13/14 @ 4:31 BY ELIZABETH BROWN, REGISTERED NURSE I

** ENCOUNTER: 513 DOCTOR'S CLINIC 08/12/14 14:05 LEE COMP
IM COMES TO CLINIC WITH COMPLAINTS OF BILATERAL FOOT AND KNEE PAIN AND SWELLING. HAS BEEN GOING ON FOR SOME TIME. HAS HAD X-RAYS OF FEET, KNEES, AND ELBOWS ALL OF WHICH SHOWED CALCIFICATIONS, PRODUCTIVE CHANGES AT THE ACHILLES TENDON INSERTIONS, AND SPUR FORMATION.
SAW ORTHO ON 12/4/13 AND REC MEDICAL TX AND ORTHOTIC SHOES FROM CAPITAL PROSTHETICS. DID NOT REC SURGICAL INTERVENTION AT THAT TIME.
REPEATED CBC'S DONE IN PAST REVEALED HYPOCHROMIC AND MICROCYTIC ANEMIA.
AGET CBC WITH DIFF, FOLATE, B12 LEVELS AND SERUM FE, TIBC, AND FE SATURATION.
ALSO GET CMP AND CRP.
X-RAY BOTH KNEES AND BOTH FEET..

P> TRAMADOL 50MG TAB (ULTRAM) (FORMULARY 7 DAYS OR LESS)
SIG: 50MG PO QID PRN PAIN.
SIG:

START DATE: 08/12/14 TOTAL DAYS: 7

MD: NEVILLE, RUFUS L

SIGNED OFF ON 08/12/14 @ 14:23 BY RUFUS L NEVILLE JR, UNCLASSIFIED
LABS PLACED ON SCHEDULING AND NEEDS LIST. INITIATED XRAY REQUEST. SENT TO LP N SCREEN FOR MEDS.

SIGNED OFF ON 08/12/14 @ 14:46 BY DEBBIE THOMAS ANDERSON, REGISTERED NURSE I
MAR UPDATED

SIGNED OFF ON 08/13/14 @ 4:51 BY ELIZABETH BROWN, REGISTERED NURSE I

** ENCOUNTER: 512 DENTAL CLINIC 07/22/14 10:35 LEE COMP
TEETH CLEANED, POE, OHI BY DR. UBAH, SEE HARD COPY
SIGNED OFF ON 07/22/14 @ 10:36 BY DEBORAH L MCCLARY, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 511 NARRATIVE 07/09/14 9:41 LEE COMP
INMATE WAS NO SHOW TO MEDICAL FOR MD CLINIC. DORM WAS NOTIFIED PER TELEPHONE.
SIGNED OFF ON 07/11/14 @ 9:42 BY WANDA K FULTON, REGISTERED NURSE II

** ENCOUNTER: 510 NARRATIVE 07/07/14 8:25 LEE COMP
INMATE WAS A NO SHOW TO MEDICAL FOR MD CLINIC. INMATE WILL BE RESCHEDULED.
SIGNED OFF ON 07/08/14 @ 8:25 BY WANDA K FULTON, REGISTERED NURSE II

** ENCOUNTER: 509 SICK CALL 05/15/14 13:32 LEE COMP
S> LATE ENTRY FOR 5/14/14: INMATE REPORTED TO MEDICAL REQUESTING TO HAVE MEDICATIONS RENEWED.
O> TEMP=99.1 PULSE=71 RESP=16 BP=128/88 WEIGHT=190 O2 SAT= 0
INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING.
. SKIN WARM AND DRY. COLOR WNL.

-3 . 1x3

MDCI880D
OMINMDCASOUTH CAROLINA DEPARTMENT OF CORRECTIONS
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C0559

SCDC# 113830 GREEN, TIMOTHY F.

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A> DEFER TO MD/NP

P> PRILOSEC 20MG CAPS (12 HR INTERVAL IF GIVEN WITH PLAVIX)

SIG: TAKE (1) PO QD (#30/MONTH)

SIG:

START DATE: 05/15/14 TOTAL DAYS: 180

MD: HUGHES, MICHAEL L

VISINE A EYEDROPS

SIG: (2) GTTS OU BID PRN (1 BOTTLE/MONTH)

SIG:

START DATE: 05/15/14 TOTAL DAYS: 180

MD: HUGHES, MICHAEL L

EXPLAINED TO INMATE WILL FORWARD TO MD/NP FOR POSSIBLE MEDICATION APPROVAL.

INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 05/15/14 @ 13:36 BY WANDA K FULTON, REGISTERED NURSE II

SIGNED OFF ON 05/16/14 @ 10:36 BY MICHAEL L HUGHES, PHYSICIAN II

MAR UPDATED.

SIGNED OFF ON 05/20/14 @ 10:01 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE

** ENCOUNTER: 508 NARRATIVE 05/14/14 11:29 LEE COMP
IM WAS NO SHOW FOR SICK CALL
SIGNED OFF ON 05/14/14 @ 11:29 BY MELISSA LUANNE COONCE, MEDICAL ASSISTANT TE

** ENCOUNTER: 507 NARRATIVE 05/07/14 14:42 LEE COMP
IM WAS NO SHOW FOR SICK CALL DUE TO DORM LOCKDOWN. WILL BE RESCHEDULED WHEN
LOCKDOWN IS LIFTED
SIGNED OFF ON 05/07/14 @ 14:43 BY MELISSA LUANNE COONCE, MEDICAL ASSISTANT TE

** ENCOUNTER: 506 PPD 04/04/14 10:46 LEE COMP
PPD PLANTED 3-21-14
PPD READ 3-24-14
0-4MM
SIGNED OFF ON 04/04/14 @ 10:46 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE

** ENCOUNTER: 505 SICK CALL 02/19/14 12:16 LEE COMP
S> IM HERE WITH SAME C/O OF 01/23/14, ENC 504. INFORMED IM THAT HE IS ON
MD CLINIC LIST BUT THIS NURSE WILL PLACE ON LIST AGAIN. IM A BIT ARGUMENTIV
E ABOUT PROTHETIC SHOES BEING DENIED, THAT HE NEEDS NAME OF PERSON WHO
DISAPPROVED NEED, THAT HIS ATTORNEY WOULD BE CHECKING ON THIS. THIS NURSE
INFORMED IM THAT THIS NURSE HAS NO JURISDICTION CONCERNING APPROVAL OR
DISAPPROVAL. VERBALIZES UNDERSTANDING. IM STATES HE IS OUT OF HIS EYE DROPS
AND HIS "JOCK ITCH" CREAM. SO #20 APPLIED.

O> TEMP=98.2 PULSE= 79 RESP=20 BP=110/ 60 WEIGHT=195 O2 SAT= 0

A> FUNGAL RASH (TINEA)

P> 1. SEE S.O. #20.

2. WASH AREA WITH SOAP AND WATER, RINSE WELL, AND DRY THOROUGHLY.

3. INSTRUCT PATIENT TO APPLY A THIN LAYER OF CLOTRIMAZOLE CREAM BID FOR A
PERIOD OF 4 WEEKS.

SIGNED OFF ON 02/19/14 @ 12:22 BY MARGARET ANNE WEST, REGISTERED NURSE I

SIGNED OFF ON 02/20/14 @ 13:49 BY MICHAEL L HUGHES, PHYSICIAN II

SIGNED OFF ON 02/21/14 @ 13:43 BY JOY NORAH, LICENSED PRACTICAL NURSE

MDCI880D
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SCDC# 113830 GREEN, TIMOTHY F.

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INMATE REQUEST LAMISIL PILLS AND CREAM AGAIN FOR JOCK ITCH. INMATE STS CLOTRIMAZOLE INEFFECTIVE, LAMISIL ORDER IN PAST FOR FUNGUS AND WAS EFFECTIVE. (SEE F5 SCREEN)

O> TEMP=098.3 PULSE= 77 RESP=20 BP=130/ 80 WEIGHT=195 O2 SAT= 0
AMBULATES UNSTEADY, LIMPING, RESP EVEN AND NONLABORED, INMATE IN NO ACUTE DISTRESS, SKIN WARM AND DRY, COLOR WNL.
SLIGHT EDEMA TO ANKLES BILATERALLY, PP 2+, FEET WARM AND DRY, SKIN INTACT.
INMATE VERBALIZED COMPLIANCE WITH GOUT MEDICATION; IBUPROFEN ISSUED IN CLINIC FOR DISCOMFORT.

RAISED DARKENED RASH TO ENTIRE GROIN, INMATE STS "ITCHES BAD"

A> DEFERED TO MD

P> LAMISIL AT 30GM

SIG:APPLY TO GROIN BID

SIG:

START DATE: 12/11/13 TOTAL DAYS: 30

MD:HUGHES, MICHAEL L

LAMISIL 250MG TABLETS (TERBINAFINE)

SIG:1 PO Q D #45

SIG:

START DATE: 12/11/13 TOTAL DAYS: 45

MD:HUGHES, MICHAEL L

EXPLAINED WILL FORWARD TO MD FOR APPROVAL/RECOMMENDATIONS, INMATE VERBALIZED UNDERSTANDING AND LEFT MEDICAL IN NO ACUTE DISTRESS.

SEE F5 SCREEN

SIGNED OFF ON 12/11/13 @ 10:00 BY KAREN MAROUSSON SABBAGHA, REGISTERED NURSE

SIGNED OFF ON 12/11/13 @ 12:27 BY MICHAEL L HUGHES, PHYSICIAN II

MAR UPDATED

SIGNED OFF ON 12/11/13 @ 16:40 BY JONI ROGERS, LICENSED PRACTICAL NURSE

** ENCOUNTER: 498 OUTSIDE RECOMMENDATION 12/11/13 3:05 LEE COMP

I/M WAS SEEN IN ORTHO BY DR GRABOWSKI ON 12/4/13

RECS-LARGELY MEDICAL TREATMENT AT THIS POINT TO DECREASE FREQ OF FLARES

NO SURGICAL INTERVENTION NEEDED AT THIS POINT

D/C FROM CLINIC

CAPITAL PROSTHETICS FOR ORTHOTICS BILAT SHOES (CONSULT INITIATED)

C. AYERS, BSN, RN-BC

SIGNED OFF ON 12/11/13 @ 3:07 BY CHARLES E AYERS JR, UNCLASSIFIED

SIGNED OFF ON 12/11/13 @ 8:56 BY MICHAEL L HUGHES, PHYSICIAN II

** ENCOUNTER: 497 NARRATIVE 11/22/13 14:31 LEE COMP

I/M HAS AN APPT WITH ORTHO ON 12/04/13.

SIGNED OFF ON 11/22/13 @ 14:32 BY MARLENE D BOYKIN, ADMINISTRATIVE ASSISTANT

** ENCOUNTER: 496 DOCTOR'S CLINIC 10/10/13 11:24 LEE COMP

IM COMES TO CLINIC WITH C/O'S OF PAIN AND SWELLING IN ELBOWS, KNEES AND FEET
HAD X-RAYS WHICH REVEALED CALCIFICATIONS AND PRODUCTIVE CHANGES ESP AT TENDON ATTACHMENTS.

HAS BEEN ON INDOCIN AND ALLOPURINOL, ETC WITH NO RELIEF.

WILL REFER TO ORTHO FOR FURTHER EVAL AND REC.

CONSULT REQUEST TO ORTHO FOR EVAL AND REC.

MCI880D
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VS:T-98.4,P-86,R-16,BP-104/76,WT.185LBS.

SIGNED OFF ON 10/10/13 @ 11:35 BY RUFUS L NEVILLE JR, UNCLASSIFIED

SIGNED OFF ON 10/13/13 @ 19:14 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
CONSULT INITIATED

C.AYERS,BSN,RN-BC

SIGNED OFF ON 10/15/13 @ 19:42 BY CHARLES E AYERS JR, UNCLASSIFIED

** ENCOUNTER: 495 NARRATIVE 10/08/13 8:07 LEE COMP
INMATE WAS A NO SHOW TO MEDICAL FOR MD CLINIC. INMATE WILL BE RESCHEDULED.
SIGNED OFF ON 10/09/13 @ 8:07 BY WANDA K FULTON, REGISTERED NURSE II

** ENCOUNTER: 494 SICK CALL 09/24/13 11:51 LEE COMP
S> PRESENTS TO MEDICAL "I WANT TO KNOW THE RESULTS OF MY LAB TESTS AND
X-RAYS. I ALSO WANT TO GET SOMETHING FOR THIS COLD I HAVE HAD GOING ON
AND GET MY PRESCRIPTIONS RENEWED."
O> TEMP=098.6 PULSE= 70 RESP=16 BP=104/ 68 WEIGHT=185 O2 SAT= 0
A&O X3, RESP EVEN, UNLABORED. SOME SINUS CONGESTION AND RHINORRHEA
PRESENT. HAS RX'S THAT HAVE EXPIRED AND ARE UP FOR RENEWAL.

A> COMMON COLD

P> 1. SEE S.O. #3.

2. IF PATIENT HAS RHINORRHEA, RUNNY NOSE, GIVE CTM 4MG TID X 3 DAYS
CTM NOT AVAILABLE.3. GIVE OPTION OF TYLENOL 325MG 1 TABLET Q8H X 3 DAYS AS NEEDED FOR DISCOMF
ORT. GIVE FROM A STOCK STANDING ORDER PACK. IF HEPATITIS C POSITIVE GIV
E IBUPROFEN 400MG 1 TAB QID X 3 DAYS. DOCUMENT MEDICATION GIVEN IN AMR.
TYLENOL STARTER GIVEN4. IF TEMPERATURE IS GREATER THAN 101 DEGREES F., GIVE TYLENOL 325MG 2 TABS
STAT AND RE-CHECK IN ONE HOUR. IF HEPATITIS C POSITIVE GIVE IBUPROFEN
400MG 2 TABS STAT AND RE-CHECK IN ONE HOUR. IF TEMPERATURE IS NOT LOWER
THAN 101 AT THAT TIME, CONSULT THE MD. DOCUMENTS ANY MEDICATIONS GIVEN
IN AMR.

N/A

5. INCREASE FLUID INTAKE TO 8-10 GLASSES OF WATER PER DAY X 3 DAYS.

6. DISCONTINUE SMOKING.

MEDICATIONS FOR RENEWAL ENTERED INTO F5 FOR MD SIGNOFF IF APPROPRIATE.
TYLENOL STARTER GIVEN FOR COLD, DEFERED TO MD FORSUBSTITUTE CTM ORDER SINCE IT IS NO LONGER AVAILABLE AND INMATE IS ON
CANTEEN RESTRICTIONS.

VERBALIZED UNDERSTANDING OF TREATMENT PLAN AND LEFT MEDICAL IN NO DISTRESS.

SIGNED OFF ON 09/24/13 @ 12:02 BY JUSTIN R GUDVANGEN, REGISTERED NURSE I

SIGNED OFF ON 09/26/13 @ 14:46 BY RUFUS L NEVILLE JR, UNCLASSIFIED

MAR UPDATED

SIGNED OFF ON 10/14/13 @ 12:45 BY JOY NORAH, LICENSED PRACTICAL NURSE

** ENCOUNTER: 493 X-RAY 09/18/13 4:10 LEE COMP
I/M HAD XRAYS OF LEFT AND RIGHT FEET, LEFT AND RIGHT KNEES, AND LEFT AND RI
GHT ELBOWS AT IMAGECARE ON 9/16/13.
(LEFT FOOT)-SMALL ACHILLES TENDON CALCIFICATION NREAR ITS INSERTION AT THE
CALCANEUS.
(RIGHT FOOT)- PRODUCTIVE CHANGES AT THE ACHILLES TENDON INSERTION.

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(LEFT KNEE) - SOFT TISSUE SWELLING AND POSSIBLE SOFT TISSUE MASS OVERLYING THE PATELLAR TENDON, INFERIOR AND LATERAL OF THE PATELLA. MILD PRODUCTIVE CHANGES AT THE QUADRICEPS INSERTION OF THE PATELLA.

(RIGHT KNEE) - SOFT TISSUE SWELLING OVER THE ANTERIOR PATELLA AND PATELLAR TENDON WITH MILD ENTHESOPATHY AT THE QUADRICEPS INSERTION AT THE PATELLA

(LEFT ELBOW) - OLECRANON-TRICEPS INSERTION SPUR

(RIGHT ELBOW) - TRICEPS SPUR AT THE OLECRANON.

C. AYERS, BSN, RN-BC

SIGNED OFF ON 09/18/13 @ 4:14 BY CHARLES E AYERS JR, UNCLASSIFIED
INMATE INFORMED OF RESULTS DURING SICK CALL, AWAITING FURTHER ORDERS.

J. GUDVANGEN BSN, RN

SIGNED OFF ON 09/24/13 @ 11:49 BY JUSTIN R GUDVANGEN, REGISTERED NURSE I

SIGNED OFF ON 09/26/13 @ 14:47 BY RUFUS L NEVILLE JR, UNCLASSIFIED

SIGNED OFF ON 10/14/13 @ 12:46 BY JOY NORAH, LICENSED PRACTICAL NURSE

** ENCOUNTER: 492 DOCTOR'S CLINIC 09/05/13 11:54 LEE COMP
IM COMES TO CLINIC FOR PAINFUL ELBOWS, KNEES, ANKLES, AND FEET. LABS INDICATE
CRP OF 5.0 WHICH IS ELEVATED.

DO RHEUMATOID FACTOR-ANA, AND X-RAY ELBOWS, KNEES, AND BOTH FEET.

HS FORM COMPLETED TODAY GIVING HIM WORK RESTRICTIONS, BOTTOM FLOOR AND BOTTOM BUNK.

F/U WHEN LABS AND X-RAYS BACK.

SIGNED OFF ON 09/05/13 @ 12:01 BY RUFUS L NEVILLE JR, UNCLASSIFIED

SIGNED OFF ON 09/06/13 @ 8:31 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE
LAB TECH NOTIFIED

XRAY REQ COMPLETED

SCHEDULER NOTIFIED OF F/U AFTER XRAYS

SIGNED OFF ON 09/06/13 @ 17:41 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE

** ENCOUNTER: 491 SICK CALL 08/29/13 15:08 LEE COMP
S> LATE ENTRY FOR 08/26/13

INMATE REPORTS TO MEDICAL WITH SEVERAL COMPLAINTS.

INMATE STATES "I HAVE A RASH ON THE HEAD OF FALUS, I HAVEN'T BEEN CIRCUMCISED AND IT IS A PROBLEM. MY KNEES ARE GETTING WORSE AND ARE SLIPPING OUT OF JOINT, I NEED A MRI ON MY KNEES, XRAYS ARE NOT GOING TO SHOW THE PROBLEMS"

INMATE REQUEST REFILL OF MEDICATION AND A CHANGE OF MEDICAL CLASSIFICATION.

INMATE REQUESTS MD APPT DUE TO UNRESOLVED HEADACHES

O> TEMP=98.4 PULSE= 80 RESP=20 BP=124/ 74 WEIGHT=185 O2 SAT= 0
AMBULATES WITHOUT DIFFICULTY, RESP EVEN AND NONLABORED, INMATE IN NO ACUTE
DISTRESS, SKIN WARM AND DRY, COLOR WNL.

SMALL BUMPS TO PENIS, NO DRAINAGE, NO CRUSTING. INMATE ENCOURAGED TO
KEEP AFFECTED AREA CLEAN AND DRY.

SLIGHT EDEMA TO LEFT KNEE, CREPTIUS NOTED, GOOD ROM BILATERALLY

A> DEFERED TO MD

VO DR. NEVILLE

NIZORAL 15 GM APPLY TO AFFECTED AREA BID X 10 DAYS

INDOMETHACIN 50MG ONE TAB PO TID WITH FOOD X 10 DAYS

ALLOPURINOL 300MG ONE TAB PO AT HS

***PER DR. NEVILLE, WILL SEE INMATE IN MD CLINIC TO ASSESS NEED FOR
BOTTOM BUNK/FLOOR***

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SEE F5 SCREEN

IBUPROFEN STARTER PACK ISSUED FOR DISCOMFORT

PLACED ON NEEDS LIST FOR MD CLINIC

SIGNED OFF ON 08/29/13 @ 16:46 BY KAREN MAROUSSON SABBAGHA, REGISTERED NURSE

SIGNED OFF ON 09/05/13 @ 11:53 BY RUFUS L NEVILLE JR, UNCLASSIFIED

MAR UPDATED

SIGNED OFF ON 09/19/13 @ 9:31 BY JONI ROGERS, LICENSED PRACTICAL NURSE

** ENCOUNTER: 490 LAB CLINIC 08/07/13 12:10 LEE COMP
ADDITIONAL LAB RESULTS RETURNED AND THE FOLLOWING ARE OUT OF THE NORMAL RANGE...
CHOLESTEROL...221H MG/DL (RANGE 5-199)
C-REACTIVE PROTEIN...5.00 MG/DL (RANGE 0.00-1.00)
SIGNED OFF ON 08/07/13 @ 12:11 BY CANDI N BOWEN, MEDICAL ASSISTANT TECH I
SEE F5 SCREEN.
SIGNED OFF ON 08/08/13 @ 12:30 BY RUFUS L NEVILLE JR, UNCLASSIFIED
MARS UPDATED
SIGNED OFF ON 08/13/13 @ 8:37 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 489 LAB CLINIC 08/01/13 11:41 LEE COMP
LAB RESULTS RETURNED AND THE FOLLOWING ARE OUT OF THE NORMAL RANGE...
HGB...11.8G/DL
HCT...38.9L%
MCV...73.8L FL
MCH...22.3L PG
MCHC...30.3L G/DL
MPV...11.6H FL
AUTO DIFF
NEUT%...39.2L% (RANGE 40.0-74.0)
MONO%...12.6H% (RANGE 2.0-12.0)
ALL OTHER FACTORS ARE WNL.
SIGNED OFF ON 08/01/13 @ 12:02 BY CANDI N BOWEN, MEDICAL ASSISTANT TECH I
SEE F5 SCREEN.
SIGNED OFF ON 08/05/13 @ 15:14 BY RUFUS L NEVILLE JR, UNCLASSIFIED
MAR UPDATED
SIGNED OFF ON 08/08/13 @ 11:21 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE

** ENCOUNTER: 488 LAB CLINIC 07/16/13 11:31 LEE COMP
LABS WERE COLLECTED AND SENT TO LAB.
SIGNED OFF ON 07/16/13 @ 11:31 BY CANDI N BOWEN, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 487 DOCTOR'S CLINIC 07/15/13 13:11 LEE COMP
IM COMPLAINS OF PAINFUL AND SWOLLEN JOINTS, FEET, HANDS ETC. BEGAN ABOUT 3 WEEKS AGO.
EXAM REVEALS SOME RESIDUAL SWELLING BUT INJECTION OF TORADAL YESTERDAY GAVE SOME RELIEF.
GET CBC WITH DIFF., CMP, CRP, ANA AND IF POSITIVE GET DNA.
INDOCIN 50MG PO TID X10 DAYS. TAKE WITH FOOD. IF CAN'T TAKE WITH FOOD, DO NOT GIVE.
PRILOSEC 20MG PO BID X30 DAYS.

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P> INDOMETHACIN 50MG CAP (INDOCIN) (FORMULARY UP TO 10 DAYS)

SIG: INDOCIN 50MG PO TID TAKE WITH FOOD.

SIG:

START DATE: 07/15/13 TOTAL DAYS: 10

MD: NEVILLE, RUFUS L

PRILOSEC 20MG CAPS (12 HR INTERVAL IF GIVEN WITH PLAVIX)

SIG: 20MG PO BID

SIG:

START DATE: 07/15/13 TOTAL DAYS: 30

MD: NEVILLE, RUFUS L

SIGNED OFF ON 07/15/13 @ 13:25 BY RUFUS L NEVILLE JR, UNCLASSIFIED
MAR UPDATED

SIGNED OFF ON 07/17/13 @ 13:08 BY JONI ROGERS, LICENSED PRACTICAL NURSE

** ENCOUNTER: 486 FOLLOW-UP SICK CALL 07/14/13 13:08 LEE COMP
INMATE TO MEDICAL FOR F/U AND TO GIVE MEDICATION.
INMATE IN W/C- STATES UNABLE TO STAND D/T CONT PAIN IN JOINTS. DECREASED EN
DEMA NOTED TO RIGHT ARM.
TEMP 101.8, HR 78, RR 18, BP 110/60
INMATE RECEIVED FOLLOWING MEDS AS ORDERED:
PHENERGAN 50MG IM GIVEN LEFT DELTOID, TORADOL 60MG IM GIVEN RIGHT DELTOID
ROCEPHIN 1 GM IM GIVEN LEFT DORSOGLUTEAL
INMATE TOLERATED WELL AND LEFT MEDICAL IN STABLE CONDITION.
WILL F/U PRN- HAS MD APPT IN AM
SIGNED OFF ON 07/14/13 @ 13:14 BY ROXANNE F LAPOINTE, REGISTERED NURSE I
KEEP SCHEDULED APPT.
SIGNED OFF ON 07/15/13 @ 11:58 BY RUFUS L NEVILLE JR, UNCLASSIFIED
SIGNED OFF ON 07/17/13 @ 13:05 BY JONI ROGERS, LICENSED PRACTICAL NURSE

** ENCOUNTER: 485 FOLLOW-UP SICK CALL 07/13/13 17:04 LEE COMP
I/M BROUGHT BACK TO MEDICAL AFTER OFC FOX CALLED STATING THAT HE "PASSED OU
T IN THE SHOWER." I/M STATED THIS AND IT WAS UNOBSERVED.
VS-ORAL TEMP 100.4 HR 73 RR 18 BP 118/60 WT 190 02 SAT 99 FSBS 97
SPOT CHECKED BLOOD GLUCOSE LEVELS DUE TO I/M FASTING BECAUSE OF RAMADAN.
I/M WITH SLIGHT SWELLING IN RIGHT HAND AND I/M STATES HE CANNOT MAKE A FIST
. I/M ALSO C/O PAIN IN ANKLES, KNEES, BOTH SHOULDERS. STATES HE THINKS HE H
AS GOUT. PALPATED AREAS AND I/M SHOWED NO GUARDING OR TENDERNESS TO TOUCH.
POSSIBLE ARTHRITIC PAIN AND GIVEN WEATHER CAUSING A FLARE-UP. PT ALSO C/O N
AUSEA WITH NO VOMITING. CALLED NP ENLOE AND RECEIVED ORDERS
KETOROLAC 60MG IM BID UNTIL MONDAY. PHENERGAN 50MG IM BID UNTIL MONDAY.
BOTH DOSES GIVEN AT 1640 INTO EACH DELTOID. ALSO NP ENLOE WANTED PT TO HAVE
CBC WITH DIFF, ESR LABS DRAWN ON MONDAY. PLACED ON NEEDS LIST.
I/M PUSHED IN W/C BACK TO DORM DUE TO C/O PAINFUL AMBULATION. I/M TO COME T
O MEDICAL AT APPROX 0400 IN A.M. FOR NEXT INJECTIONS. VERBALIZED UNDERSTAND
ING OF THESE INSTRUCTIONS. NO INJURES NOTED FROM ALLEGED "PASSING OUT."
C. AYERS, BSN, RN-BC
SIGNED OFF ON 07/13/13 @ 17:15 BY CHARLES E AYERS JR, UNCLASSIFIED
RECHECKED TEMPERATURE AT APPROX 1800 AND IT READ 102.7 ORAL. CALLED NP ENLO
E BACK AND SHE ORDERED 1 GR ROCEPHIN IM NOW DOSE AND REPEAT 1GR ROCEPHIN
IN A.M. SHE DID NOT SPECIFY AS TO EXACTLY WHAT TIME. ORDER PLACED IN MAR BY

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LPN ANDERSON. I/M THEN INFORMED THIS NURSE THAT HE CONTINUES TO BE UNABLE TO "WALK UP THE STAIRS." I/M ALSO STATED THAT HE WAS ON TOP BUNK. CALLED CPT STONEBREAKER AND ASKED FOR ROOM CHANGE TO BOTTOM TIER AND ALSO TO BOTTOM BUNK. NP ENLOE AWARE OF NEED FOR ROOM CHANGE AND CONCURS. I/M IS TO ALSO HAVE HIS VS TAKEN IN A.M. NP ENLOE WANTS TO BE CALLED WITH UPDATES. PER TELEPHONE ORDER, FIRST DOSE OF ROCEPHIN 1GR WAS GIVEN INTO LEFT THIGH USING LIDOCAINE 1% TO RECONSTITUTE. I/M WAS TAKEN BACK TO HIS DORM BY HOSPICE WORKER IN A WHEELCHAIR. WILL F/U PRN.

C. AYERS, BSN, RN-BC

SIGNED OFF ON 07/13/13 @ 19:06 BY CHARLES E AYERS JR, UNCLASSIFIED
F/U WITH MD PRN.

SIGNED OFF ON 07/15/13 @ 11:57 BY RUFUS L NEVILLE JR, UNCLASSIFIED

SIGNED OFF ON 07/17/13 @ 13:05 BY JONI ROGERS, LICENSED PRACTICAL NURSE

** ENCOUNTER: 484 EMERGENCY INHOUSE 07/12/13 15:27 LEE COMP
S> INMATE TO MEDICAL WITH C/O INCREASED SWELLING TO ARM AND INCREASED JOINT PAIN. INMATE STATES HE IS FASTING FOR RAMADAN AND IF HE WERE TO GET AN ORDER FOR MEDICINE TO HAVE IT AFTER 8PM. INMATE DENIES ALLERGIES- STATES IT BEGAN APPROX 2 WEEKS AGO IN FEET BUT NOW THE SWELLING IS GETTING WORSE AS WELL AS THE PAIN IN THE JOINTS. DENIES DISCOLORED URINE
O> TEMP=098.2 PULSE= 71 RESP=18 BP=102/ 70 WEIGHT=111 O2 SAT= 0
INMATE SEEN IN MEDICAL. AOX3, GAIT STEADY- BUT SLOW. NO ACUTE DISTRESS NOTED RR EVEN AND NON-LABORED. VITALS WNL. RIGHT HAND WITH 1+NON-PITTING EDEMA- WARM TO TOUCH- NO DISCOLORATION. DECREASED ROM- UNABLE TO MAKE FIST. +RADIAL PULSES. +PP- NO EDEMA TO LOWER EXTREMITIES AT THIS TIME. LSCTA. O2 SAT 97%.
A> ENLOE, NP GAVE TELEPHONE ORDER FOR TORADOL 60MG IM OK TO GIVE AFTER 8PM. INMATE HAS MD APPT WITH DR NEVILLE MONDAY. PILL ROOM UPDATED AND OTR ISSUED TO INMATE.
P> KETOROLAC INJ 60MG (TORADOL) (FORMULARY FOR 1 DOSE)
SIG: GIVE 60MG IM AFTER 8PM GIVEN FROM STOCK
SIG:
START DATE: 07/12/13 TOTAL DAYS: 1
MD: ENLOE, AMY -
INMATE INSTRUCTED TO RETURN TO MEDICAL IF SX GOT WORSE, DIFFICULTY URINATING/CHANGE OF URINE COLOR, DIFFICULTY BREATHING.
INMATE VERBALIZED UNDERSTANDING AND LEFT MEDICAL IN STABLE CONDITION
SIGNED OFF ON 07/12/13 @ 15:40 BY ROXANNE F LAPOINTE, REGISTERED NURSE I
I/M RECEIVED TORADOL 60MG/2ML IM TO RIGHT DELTOID. I/M TOLERATED INJECTION W/O DIFFICULTY.
SIGNED OFF ON 07/12/13 @ 23:01 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
SIGNED OFF ON 07/15/13 @ 13:10 BY RUFUS L NEVILLE JR, UNCLASSIFIED
SIGNED OFF ON 07/17/13 @ 13:04 BY JONI ROGERS, LICENSED PRACTICAL NURSE

** ENCOUNTER: 483 SICK CALL 07/11/13 11:46 LEE COMP
S> INMATE REPORTED TO MEDICAL WITH C/O HAND, KNEE, AND FOOT PAIN WITH SWELLING. INMATE STATES HAS PAIN IN HANDS, KNEES, AND FEET WHEN THEY SWELL. INMATE STATES TURN RED AT TIMES AND JOINTS FEEL STIFF. INMATE STATES DIFFICULT TO MAKE A FIST DUE TO TIGHTNESS IN FINGERS.
TEMP=098.2 PULSE= 70 RESP=20 BP=130/ 74 WEIGHT=190 O2 SAT= 0

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INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING. SKIN WARM AND DRY. COLOR WNL. NO LEG, KNEE, OR FOOT EDEMA OR ERYTHEMA. FULL ROM TO LOWER EXTREMITIES. PEDAL PULSES STRONG AND EQUAL BILATERALLY. INMATE RIGHT HAND HAS EDEMA TO INDEX, MIDDLE, AND RING FINGERS AT FIRST KNUCKLE WITH SOME ERYTHEMA. INMATE UNABLE TO MAKE COMPLETE FIST. CAPILLARY REFILL <3 SECONDS.

A> MUSCULOSKELETAL DISCOMFORT

P> 1. SEE S.O. #27.

2. ACETAMINOPHEN 325MG 1 TABLET PO Q8H X 3 DAYS AND IBUPROFEN 400 MG 1 TABLET P.O. Q6H X 3 DAYS. GIVE FROM STANDING ORDER PACKS. DO NOT GIVE TYLENOL TO INMATES WITH HISTORY OF HEPATITIS C. DO NOT GIVE IBUPROFEN TO INMATES WITH HISTORY OF RENAL DISEASE. DOCUMENT MEDICATIONS GIVEN IN AMR.

IBUPROFEN STARTER PACK ISSUED AND INMATE INSTRUCTED TO TAKE WITH FOOD.

3. FOR LOWER BACK DISCOMFORT, USE A ROLLED TOWEL UNDER LOW BACK X 5 DAYS.

4. WILLIAM FLEXION EXERCISE (SCDC FORM 24-146) FOR CHRONIC LOW BACK PAIN.

5. RESTRICT STRENUOUS ACTIVITIES OR REST THE INVOLVED AREA.

6. INSTRUCT INMATE TO APPLY HEAT (BY SHOWER, MOIST COMPRESSES OR HOT WATER SOAKS) TO THE INVOLVED AREA QID X 3 DAYS

7. MAY ISSUE 48-72 HOUR NO WORK PASS AS NEEDED. IF AFTER 72 HOURS AND FURTHER EXCUSE IS REQUIRED, NOTIFY MD FOR ORDERS.

EXPLAINED TO INMATE WILL SCHEDULE FOR MD CLINIC ON 07/15/13. (SCHEDULER NOTIFIED) INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 07/11/13 @ 11:52 BY WANDA K FULTON, REGISTERED NURSE II

** ENCOUNTER: 482 EMERGENCY INHOUSE 06/27/13 9:58 LEE / COMP
INMATE PUSHED TO MEDICAL WITH C/O " I HAVE PAIN IN MY BONES AND NEED TO SEE THE DOCTOR, THIS HAS BEEN GOING ON FOR 3 WEEKS".

VITALS: 97.9, 78, 20, 110/72, 200

A&OX3, RESP EVEN AND NONLABORED, SKIN WARM AND DRY, COLOR WNL, LUNG SOUNDS CLEAR, S1 S2 HEART SOUNDS.

INMATE STATES HE HAS BEEN SWEATING AND REQUEST MD APPT.

MR. SCOTT EXPLAINED TO INMATE THAT INMATE'S VITALS ARE WNL, INMATE BEGAN TO BECOME ARGUMENTATIVE.

THIS NURSE ISSUED INMATE IBUPROFEN AND ASSURED HE WOULD BE PLACED ON MD LIST BUT WAIT TIME 3-4 WEEKS. INMATE DID VERBALIZE UNDERSTANDING AND WAS PUSHED BACK TO DORM IN NO ACUTE DISTRESS.

SIGNED OFF ON 06/27/13 @ 15:00 BY KAREN MAROUSSON SABBAGHA, REGISTERED NURSE

** ENCOUNTER: 481 TELEPHONE ENCOUNTER 06/27/13 9:57 LEE COMP
OFFICER TELEPHONE TO INFORM MEDICAL INMATE COULD NOT WALK AND WAS BEING PUSHED TO MEDICAL IN W/C.

SIGNED OFF ON 06/27/13 @ 9:58 BY KAREN MAROUSSON SABBAGHA, REGISTERED NURSE

** ENCOUNTER: 480 EMERGENCY INHOUSE 06/02/13 9:14 LEE COMP
OFFICER CALLED STATING THAT THE INMATE WAS PASSED OUT AND NEEDED STRETCHER FOR INMATE TO BE BROUGHT TO MEDICAL. HOSPICE WORKERS SENT FOR INMATE. INMATE INTO MEDICAL ALERT AND ORIENTED X 3. RESP EVEN AND UNLABORED. O2 SAT 98%. LUNGS CLEAR TO AUSCULTATION. SKIN W/D TO TOUCH. INMATE ABLE TO MOVE ALL EXTREMITIES WITHOUT DIFFICULTY. INSTRUCTED INMATE THAT ALL HIS VITAL SIGNS WERE

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WNL. ALSO THAT HE WAS TAKING 2 MEDICATIONS FOR ACHES. INMATE STATING HE WAS HURTING ALL OVER. INMATE THREATENED TO CALL HIS FAMILY TO HAVE THEM CALL HIS ATTORNEY. INMATE SENT BACK TO HIS DORM IN NO DISTRESS.
JANDERSON, RN

SIGNED OFF ON 06/02/13 @ 9:22 BY JACQUELINE M ANDERSON, REGISTERED NURSE I

** ENCOUNTER: 479 DOCTOR'S CLINIC 05/22/13 13:27 LEE COMP

S> C/O 1- KNOT IN STOMACH, PAINFUL WHEN HE LIES ON LT SIDE
2- HEADACHES Q 2 DAYS, SENS TO LITE, FRONTAL AND EYES. VISION OK W/ REL NEW GLASSES

3- KNEES PAINFUL SINCE OFFICER ENCOUNTER 2010

O> TEMP=098.1 PULSE= 83 RESP=20 BP=122/ 73 WEIGHT=195 O2 SAT= 0
ABDOMEN WNL. KNEES W/ CHRONIC ARTHRITIC CHANGES; NORMAL ROM AND STRENGTH.
HEENT WNL. GROSS NEURO WNL.

P> INDERAL LA 60MG CAPS (PROPRANOLOL ER)

SIG:1 PO QD HEADACHE PREVENTION - DISP # 30/MOS

SIG:

START DATE: 05/22/13 TOTAL DAYS: 90

MD:BEINOR, MICHAEL -

MELOXICAM 15MG TAB (MOBIC)

SIG:1 PO QD HEADACHES AND KNEE PAIN; DISP #30/MOS

SIG:

START DATE: 05/22/13 TOTAL DAYS: 90

MD:BEINOR, MICHAEL -

SIGNED OFF ON 05/22/13 @ 13:37 BY MICHAEL J BEINOR, UNCLASSIFIED

MAR UPDATED

SIGNED OFF ON 05/24/13 @ 11:40 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE

** ENCOUNTER: 478 SICK CALL 05/17/13 19:19 LEE COMP

S> INMATE REPORTS TO SICK CALL WITH C/O "HAVING SEVERE HEADACHES AND MY KNEES HAS GOTTEN WORSE, HEADACHES SEEM LIKE THEY ARE IN MY EYES".

O> TEMP=097.4 PULSE= 72 RESP=18 BP=126/ 72 WEIGHT=190 O2 SAT= .0
AMBULATES WITHOUT DIFFICULTY

SEEN IN MD CLINIC 5/22/13

SIGNED OFF ON 05/22/13 @ 13:27 BY MICHAEL J BEINOR, UNCLASSIFIED

** ENCOUNTER: 477 SICK CALL 05/17/13 7:36 LEE COMP

A> OPENED IN ERROR

SIGNED OFF ON 05/17/13 @ 7:45 BY KAREN MAROUSSON SABBAGHA, REGISTERED NURSE

** ENCOUNTER: 476 NARRATIVE 04/12/13 16:38 LEE COMP

MEDICATION EXPIRED DUE TO NON-PICKUP, COLACE 100MG WILL BE SND BACK TO KCL PHARMACY

SIGNED OFF ON 04/12/13 @ 16:40 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 475 SICK CALL 03/08/13 19:17 LEE COMP

S> INMATE TO MEDICAL WITH C/O KNOT IN STOMACH AND IS PAINFUL WHEN HE LAYS ON LEFT SIDE. INMATE STATES "I CAN FEEL IT WHEN I LAY ON MY SIDE"

INMATE REQUESTS STOMACH, KIDNEYS AND LIVER TO BE CHECKED BECAUSE OF KNOT IN LEFT SIDE.

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INMATE STATES KNOT POPS OUT AT TIMES.

INMATE STATES FIBER PILLS INEFFECTIVE AND REQUESTS STOOL SOFTNER.

O> TEMP=097.9 PULSE= 68 RESP=18 BP=122/ 80 WEIGHT=200 O2 SAT= 0
 AMBULATES WITHOUT DIFFICULTY, RESP EVEN AND NONLABORED, NO DISTRESS NOTED,
 SKIN WARM AND DRY, COLOR WNL, LUNG SOUNDS CLEAR, ABDOMEN SOFT AND NONDISTEN
 DED, MASS FELT BENEATH LEFT RIB, INMATE STATES IT IS TENDER, AFFECTED
 AREA NOT PROTRUDING, BS X4Q.

A> DEFERRED TO MD

P> INMATE INSTRUCTED TO RETURN TO MEDICAL SHOULD AREA PROTRUD FROM ABDOMEN TO
 BE ASSESSED. EXPLAINED TO INMATE WILL FORWARD REQUEST FOR SOFTNER TO MD FOR
 EVAL AND RECOMMENDATION, INMATE VERBALIZED UNDERSTANDING AND LEFT
 MEDICAL IN NAD.

IBUPROFEN STARTER PACK ISSUED FOR DISCOMFORT.

PLACED ON MD LIST BY REQUEST

SIGNED OFF ON 03/08/13 @ 19:29 BY KAREN MAROUSSON SABBAGHA, REGISTERED NURSE
 STOOL SOFTENER ORDERED

D.C FIBER

PLEASE SCHEDULE MD/NP APPT WHEN ABLE

THOMAS E BYRNEMD

SIGNED OFF ON 03/12/13 @ 15:52 BY THOMAS E BYRNE, PHYSICIAN II

SIGNED OFF ON 03/12/13 @ 15:52 BY THOMAS E BYRNE, PHYSICIAN II

SCHEDULER NOTIFIED PER SCHEDULING NEEDS LIST.

FORWARD TO PILL ROOM NURSE FOR MED ORDERS.

SIGNED OFF ON 03/13/13 @ 17:44 BY WANDA-K FULTON, REGISTERED NURSE I
 MARS UPDATED

SIGNED OFF ON 03/15/13 @ 14:24 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 474 NARRATIVE 03/08/13 13:17 LEE COMP

INMATE WAS A NO SHOW FOR SICK CALL. DORM IS ON LOCK-DOWN

SIGNED OFF ON 03/08/13 @ 13:17 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 473 LAB CLINIC 02/05/13 12:10 LEE COMP

INMATE WAS A NO SHOW FOR LABS THIS AM.....LARRY FLOYD MA

SIGNED OFF ON 02/05/13 @ 12:11 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 472 DOCTOR'S CLINIC 02/04/13 12:29 LEE COMP

RASH ON GROIN FOR 2 MONTHS FAILED OINT

T 98 R 18 WT 198 124-80 P 81

PE NAD WALKS WELL ITCHING GROIN

TOLD IM MAY NEVER GET RID OF THIS

PE CLASSIC JOCK ITCH

PLAN KETO PO AND LAMISIL CREAM

PRILOSEC FIBER

KETOCONAZOLE 200MG TABS (NIZORAL)

SIG:1 PO QD DISP 30 MONTH

SIG:

START DATE: 02/04/13 TOTAL DAYS: 30

MD: DRAGO, PAUL -

LAMISIL AT 30GM

SIG: APPLY TO GROIN BID

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SIG:

START DATE: 02/04/13 TOTAL DAYS: 30

MD: DRAGO, PAUL -

SIGNED OFF ON 02/04/13 @ 12:40 BY PAUL C DRAGO, PHYSICIAN II

MARS UPDATED

SIGNED OFF ON 02/04/13 @ 12:59 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 471 EMERGENCY INHOUSE 01/22/13 14:26 LEE COMP
S> INMATE REPORTED TO MEDICAL WITH C/O COUGHING, RUNNY NOSE, AND FEVER FOR ABOUT THREE DAYS. INMATE DENIES N/V OR DIARRHEA.

O> TEMP=098.5 PULSE= 93 RESP=16 BP=120/ 82 WEIGHT=205 O2 SAT= 0
INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING. SKIN WARM AND DRY. COLOR WNL. NO THROAT EDEMA OR ERYTHEMA. SKIN TURGOR <3 SECONDS. CAPILLARY REFILL <3 SECONDS. LUNGS CLEAR IN ALL LOBES. S1 AND S2 HEART SOUNDS AUSCULTATED.

A> COMMON COLD

P> 1. SEE S.O. #3.

2. IF PATIENT HAS RHINORRHEA, RUNNY NOSE, GIVE CTM 4MG TID X 3 DAYS
STARTER PACK ISSUED.

3. GIVE OPTION OF TYLENOL 325MG 1 TABLET Q8H X 3 DAYS AS NEEDED FOR DISCOMFORT. GIVE FROM A STOCK STANDING ORDER PACK. IF HEPATITIS C POSITIVE GIVE E IBUPROFEN 400MG 1 TAB QID X 3 DAYS. DOCUMENT MEDICATION GIVEN IN AMR.
TYLENOL STARTER PACK ISSUED.

4. IF TEMPERATURE IS GREATER THAN 101 DEGREES F., GIVE TYLENOL 325MG 2 TABS STAT AND RE-CHECK IN ONE HOUR. IF HEPATITIS C POSITIVE GIVE IBUPROFEN 400MG 2 TABS STAT AND RE-CHECK IN ONE HOUR. IF TEMPERATURE IS NOT LOWER THAN 101 AT THAT TIME, CONSULT THE MD. DOCUMENTS ANY MEDICATIONS GIVEN IN AMR.

5. INCREASE FLUID INTAKE TO 8-10 GLASSES OF WATER PER DAY X 3 DAYS.
INMATE INSTRUCTED.

6. DISCONTINUE SMOKING.

INMATE INSTRUCTED.

INMATE INSTRUCTED TO RETURN TO MEDICAL IF SYMPTOMS CONTINUE OR WORSEN. INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 01/22/13 @ 14:29 BY WANDA K FULTON, REGISTERED NURSE I

** ENCOUNTER: 470 TELEPHONE ENCOUNTER 01/21/13 8:51 LEE COMP
CALL FROM OFFICER BOLTON RECEIVED. INMATE C/O FEELING BAD AND HAVING BLOOD WHEN HE BLOWS HIS NOSE. INMATE WAS A NO SHOW TO SICK CALL ON 1/17. INFORMED OFFICER TO HAVE INMATE SIGN UP FOR SICK CALL TO BE RESCHEDULED. VERBALIZED UNDERSTANDING.
SIGNED OFF ON 01/21/13 @ 8:53 BY JUSTIN R GUDVANGEN, REGISTERED NURSE I

** ENCOUNTER: 469 NARRATIVE 01/17/13 12:03 LEE COMP
INMATE WAS A NO SHOW FOR SICK CALL.
SIGNED OFF ON 01/17/13 @ 12:03 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 468 LAB CLINIC 01/17/13 5:25 LEE COMP
THE FOLLOWING LABS CAME BACK OUT OF THE NORMAL RANGE... LARRY FLOYD MA
HGB 13.3L

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MCV 77.0L
MCH 22.9L
MCHC 29.8L
RDW 14.8H
MPV 11.1H
ANISOCYTOSIS 1+
MICROCYTOSIS 1+
ALT 6LSIGNED OFF ON 01/17/13 @ 5:27 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I
SIGNED OFF ON 01/17/13 @ 9:09 BY RICHARD C BEARDEN JR, PHYSICIAN II

** ENCOUNTER: 467 LAB CLINIC 01/15/13 11:35 LEE COMP
CBC LFT WERE COLLECTED TO SEND TO THE LAB.....LARRY FLOYD MA
SIGNED OFF ON 01/15/13 @ 11:35 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 466 NARRATIVE 01/11/13 12:43 LEE COMP
INMATE WAS A NO SHOW FOR SICK CALL.
SIGNED OFF ON 01/11/13 @ 12:43 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 465 SICK CALL 12/10/12 15:27 LEE COMP

S> "MY KNEES ARE HURTING ME AT NIGHT. I AM HAVING PAIN IN MY EYES AND MY STOMACH AT TIMES. MY FACE IS NOT HEALING PROPERLY AROUND MY EYES. I NEVER GOT THE PILL FOR MY FUNGAL RASH IN MY GROIN. I CAN DRINK MYLANTA ALL DAY, AND IT DOESN'T WORK"

O> TEMP=097.8 PULSE= 86 RESP=16 BP=102/ 72 WEIGHT=200 O2 SAT= 0
A&O X3, MULTIPLE IDIOSYNCRATIC COMPLAINTS. EYES ARE WNL, DENIES LOSS OF VISION. STATES HE WAS ASSAULTED BY AN OFFICER "A WHILE AGO" AND WAS HIT IN THE EYE. SLIGHTLY HYPERPIGMENTATION UNDER BILATERAL EYES CONSISTANT WITH AGE. INMATE'S PREV TX WITH TOPICAL ANTIFUNGALS WAS INEFFECTIVE, AND REQUIRED PO NIZORAL TO RESOLVE IN THE PAST. HX OF H. PYLORI, WHICH HAS HAD DOCUMENTED FLAREUPS NECESSITATING ABX THERAPY. CURRENTLY ON PRILOSEC.
A> DEFER TO MD FOR CONTINUED TX.

P> ENCOUNTER DEFERED TO MD FOR CONSIDERATION OF NIZORAL, WHICH WAS EFFECTIVE BEFORE, AND ABX FOR H. PYLORI.

GIVEN 20CC OF MYLANTA IN MEDICAL PER S/O 28

VERBALIZED UNDERTSANDING OF TX PLAN AND LEFT MEDICAL IN NO DISTRESS.

SIGNED OFF ON 12/10/12 @ 15:35 BY JUSTIN R GUDVANGEN, REGISTERED NURSE I
KETOCON RXED

AST NOW AND 4 WEEKS

SIGNED OFF ON 12/27/12 @ 14:43 BY BENJAMIN F LEWIS JR, PHYSICIAN II

CHANGED TO LAMISIL 250

AST, CBC NOW AND 4 WEEKS

SIGNED OFF ON 12/27/12 @ 14:49 BY BENJAMIN F LEWIS JR, PHYSICIAN II

MARS UPDATED/RETURNED TO NURSES SCREEN FOR LABS

SIGNED OFF ON 01/02/13 @ 15:33 BY SANDRA T JONES, LICENSED PRACTICAL NURSE
PLACED LABS ON NEEDS LIST

C. AYERS, BSN, RN-BC

SIGNED OFF ON 01/03/13 @ 4:52 BY CHARLES E AYERS JR, UNCLASSIFIED

** ENCOUNTER: 464 SICK CALL 10/19/12 12:45 LEE COMP

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S> INMATE TO MEDICAL WITH COMPLAINTS OF ATHELETE'S FEET AND JOCK ITCH TO GROIN, ALSO COMPLAINS THAT HE CONTINUES TO HAVE PROBLEMS WITH HIS KNEES PARTICULARLY THE LEFT KNEE. STATES THAT HE HAD A KNEE BRACE BUT IT WAS TAKEN BY CONTRABAND DURING THE LAST "SHAKE DOWN" INMATE ALSO STATES THAT HE CONTINUES TO HAVE PROBLEMS WITH RIGHT SIDE PAIN ESPECIALLY AT NIGHT.

O> TEMP=99.6 PULSE= 91 RESP=20 BP=108/ 70 WEIGHT=210 O2 SAT= 0 A&O X3, BILATERAL BREATH SOUNDS CLEAR. RESP EVEN AND NONLABORED. NOTED TO HAVE DRY SCALY RASH TO GROIN, DISCOLORATION NOTED, NOTED TO HAVE CRUSTED AREAS BETWEEN TOES.

A> ATHLETE'S FOOT (TINEA PEDIS)
FUNGAL RASH (TINEA)

P> 1. SEE S.O. #19.
2. WASH FEET WITH SOAP AND WATER, RINSE WELL AND DRY VERY THOROUGHLY.
3. INSTRUCT PATIENT TO APPLY A THIN LAYER OF MICONAZOLE OR CLOTRIMAZOLE CREAM BID FOR A PERIOD OF 4 WEEKS.

1. SEE S.O. #20.
2. WASH AREA WITH SOAP AND WATER, RINSE WELL, AND DRY THOROUGHLY.
3. INSTRUCT PATIENT TO APPLY A THIN LAYER OF MICONAZOLE OR CLOTRIMAZOLE CREAM BID FOR A PERIOD OF 4 WEEKS.

INMATE ALSO STATES THAT HE WAS ON A "PILL" IN THE PAST FOR HIS FUNGAL INFECTION. FROM PRIOR ENCOUNTER PLACED ON NIZORAL 200MG PO. WILL ASK IF MD WOULD LIKE TO REORDER? WILL BE PLACED ON SCHEDULING NEED LIST FOR MD APPOINTMENT FOR CONTINUED SIDE PAIN. ALSO REISSUED KNEE BRACE MEDICAL ASSIST R. SCOTT ABLE TO VERIFY THAT INMATE RECEIVED BRACE IN THE PAST AND BRACE HAS NOT BEEN RETURNED TO MEDICAL BY CONTRABAND. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS AMBULATORY.

SIGNED OFF ON 10/19/12 @ 13:01 BY NATASHA D MORROW, REGISTERED NURSE I
SIGNED OFF ON 10/22/12 @ 15:14 BY RICHARD C BEARDEN JR, PHYSICIAN II

** ENCOUNTER: 463 DENTAL CLINIC 10/19/12 10:57 LEE COMP
EXAM. CLEANING. OHI. SEE HARD COPY.
J.C.UBAH D.D.S.
SIGNED OFF ON 10/19/12 @ 10:57 BY JOSEPH C UBAH, DENTIST

** ENCOUNTER: 462 DOCTOR'S CLINIC 08/23/12 9:42 LEE COMP
INMATE REPORTED TO MD CLINIC AND WAS SEEN BY DR. PATE.
VITAL SIGNS: T:97.4 P:85 R:18 B/P:120/70 WEIGHT:207
S:48YO BM- KNEE PAIN L>R - ESPECIALLY AT NIGHT
NAPROSYN HAS NOT HELPED
UPPER GI PAIN- WORSE EARLY AM- PO INTAKE HELPS
O:ALERT
KNEES- BONEY, WARM, CREPITANCE-NO FLUID- PAIN ON PALPATION AND MANIPULATION
ABD- SOFT- NO MASSES, GUARDING, OR REBOUND
A&P: #1) KNEE PAIN- XRAY BOTH KNEES IN FEB 2012 MILD NARROWING
PREDNISONE 20MG (2) QD X 5 DAYS THEN (1) PO QD X 5 D
#2) GASTRITIS SECONDARY TO NSAID- RANITIDINE 300MG HS X 30D (STARTER PACK ISSUED)
PREDNISONE 20MG
SIG:TAKE (2) PO QD X 5D THEN (1) PO QD X 5D

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SIG:

START DATE: 08/23/12 TOTAL DAYS: 10

MD: PATE, JOHN -

SIGNED OFF ON 08/23/12 @ 9:52 BY WANDA K FULTON, REGISTERED NURSE I

SIGNED OFF ON 08/23/12 @ 10:58 BY BENJAMIN F LEWIS JR, PHYSICIAN II

MARS UPDATED

SIGNED OFF ON 08/24/12 @ 14:49 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 461 NARRATIVE 08/17/12 12:45 LEE COMP
I/M WAS A NO SHOW FOR SICK CALL.
SIGNED OFF ON 08/17/12 @ 12:46 BY KIM T ALLEYNE, UNCLASSIFIED

** ENCOUNTER: 460 SICK CALL 07/26/12 12:06 LEE COMP
S: INMATE TO SICK C/O RASH IN GROIN AREA, SWELLING UNDER CHIN DUE TO SHAVING
AND BILATERAL KNEE PAIN. MEDICATION RENEWAL NEEDED.
O: TEMP 99.2 PULSE 78 RESP 18 BP 116/72 WT 210
48 YEAR OLD BLACK MALE WITH HX: GERD, CONSTIPATION, CHRONIC BILATERAL KNEE
PAIN. I/M A&OX3. NAD NOTED. CHIN SWELLING NOTED. AREA TO GROIN AREA WAS RED
AND EDEMA NOTED. WARM TO TOUCH. PAINFUL TO TOUCH. INMATE STATED "SEVERE ITC
HING TO AREA." SWELLING NOTED TO BILATERAL KNEE.
A: REFER TO MD
P: INMATE STATED "I WAS GIVEN LOTRIMIN CREAM LAST TIME IT DID NOT WORK. DR
MCREE CALLED VO FOR NIZORAL 200MG TAKE ONE TAB EVERY OTHER DAY X60 DAYS. INMA
TE WAS GIVEN HYDROCORTISONE CREAM. INMATE VERBALIZED UNDERSTANDING. INMATE
LEFT MEDICAL IN NO DISTRESS.
SIGNED OFF ON 07/26/12 @ 16:35 BY MELISSA S MCDUFFIE, LICENSED PRACTICAL NURS
SIGNED OFF ON 07/27/12 @ 10:38 BY BENJAMIN F LEWIS JR, PHYSICIAN II
SIGNED OFF ON 07/27/12 @ 13:43 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 459 SICK CALL 05/25/12 9:46 LEE COMP
S> LATE ENTRY.

INMATE TO MEDICAL FOR MULTIPLE COMPLAINTS AND REQUEST FOR MEDICATION RENEWAL
S. INMATE C/O LEFT KNEE SWELLING AND PAINFUL, HAVING ULCERS IN STOMACH THAT
ARE PAINFUL, AND AN AREA UNDER CHIN THAT IS PAINFUL. INMATE ALSO STATES HE
HAS "JOCK ITCH SO BAD".

O> TEMP=098.1 PULSE= 88 RESP=18 BP=100/ 60 WEIGHT=201 PPD= 0

INMATE SEEN IN MEDICAL FOR MULTIPLE REQUESTS.

LEFT KNEE NOTED WITH SOME EDEMA- NO WARMTH OR REDNESS. SEE ENC #433. INMATE
STATES HE HAS NOT BEEN TAKING MEDICATIONS THAT HAVE BEEN PRESCRIBED. INMATE
REMINDS OF MEDICATION REFILL POLICY. STARTER PACKS OF NAPOXEN AND METHOCA
RBAMOL GIVEN AT PILL ROOM.

INMATE HAS EDEMA UNDER CHIN MIDLINE. INMATE STATES HE HAS INFECTION FROM SH
AVING. NO OPEN AREAS PRESENT.

A> FUNGAL RASH (TINEA)

P> 1. SEE S.O. #20.

2. WASH AREA WITH SOAP AND WATER, RINSE WELL, AND DRY THOROUGHLY,
FOLLOWED BY A THIN TOPICAL APPLICATION OF LOTRIMIN
CREAM BID X 4 WEEKS.

CREAM GIVEN AT PILL LINE.

SCHEDULED FOR MD F/U (SCHEDULED WITH SCHEDULER). INMATE LEFT MEDICAL IN NO

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DISTRESS AND GAVE VERBAL UNDERSTANDING OF MEDICATIONS AND INSTRUCTIONS
SIGNED OFF ON 05/28/12 @ 10:04 BY ROXANNE F LAPOINTE, UNCLASSIFIED
SIGNED OFF ON 05/31/12 @ 14:25 BY BENJAMIN F LEWIS JR, PHYSICIAN II
MARS UPDATED

SIGNED OFF ON 05/31/12 @ 16:34 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 458 FOLLOW-UP SICK CALL 04/16/12 13:56 LEE COMP
INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. INMATE
HAD NO BANDAGE WHEN CAME TO MEDICAL. INMATE HAS NO EDEMA, ERYTHEMA, OR DRAI
NAGE TO FINGER. NAIL IS LOOSE.

VO PER DR. R. STEEN ARE AS FOLLOWS:

ISSUE TAO PACKS (ISSUED FIVE)

KEEP NAIL TRIMMED (INMATE INSTRUCTED)

D/C DAILY DRESSING (DONE)

INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 04/16/12 @ 13:58 BY WANDA K FULTON, REGISTERED NURSE I

SIGNED OFF ON 04/16/12 @ 13:59 BY RONALD G STEEN, PHYSICIAN II

** ENCOUNTER: 457 FOLLOW-UP SICK CALL 04/15/12 8:44 LEE COMP
I/M PRESENTED FOR DSG CHANGE L/HAND RING FINGER, NO DRAINAGE NOTED FROM SIT
E, I/M STATED HE SQUEEZED SOME PUS OUT THIS AM. SITE CLEANED WITH WOUND CLE
ANSER AND TAO APPLIED, COVERED WITH 2X2 AND HYPAFIX TAPE. I/M TOLERATED IT
WELL. LEFT MEDICAL IN NO DISTRESS.

SIGNED OFF ON 04/15/12 @ 8:45 BY RICHARD MINICK, REGISTERED NURSE I

** ENCOUNTER: 456 FOLLOW-UP SICK CALL 04/14/12 9:34 LEE COMP
INMATE TO MEDICAL FOR DRESSING CHANGE TO LEFT RINGER FINGER. DRESSING REMOV
ED A SMALL AMOUNT OF PURLENT DRAINAGE NOTED. FINGERNAIL IS LEFT FROM NAIL B
ED. NO SWELLING, REDNESS, OR ODOR NOTED AT SITE. INMATE DENIES PAIN AT PRE
SENT. FINGER CLEANED WUTH CLEANSER, TAO APPLIED WITH 2X2 GAUZE AND SECURED
WITH TAPE. INMATE TOLERATED WELL. INAMTE LEFT MEDICAL NO ACUTE DISTRESS NO
TED.

SIGNED OFF ON 04/14/12 @ 9:39 BY MELISSA S MCDUFFIE, LICENSED PRACTICAL NURS

** ENCOUNTER: 455 FOLLOW-UP SICK CALL 04/13/12 11:14 LEE COMP
INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. INMATE
REPORTED TO MEDICAL WITH NO DRESSING. NAIL IS LOOSE, GRANULATED TISSUE TO B
ASE OF NAIL, NO EDEMA, NO ERYTHEMA, AND NO DRAINAGE. CLEANSED WITH WOUND CL
EANSER, APPLIED TAO, AND COVERED WITH 2X2 GUAZE AND STRETCH WRAP. INMATE TO
LERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 04/13/12 @ 11:16 BY WANDA K FULTON, REGISTERED NURSE I

** ENCOUNTER: 454 FOLLOW-UP SICK CALL 04/12/12 11:08 LEE COMP
I/M PRESENTED TO MEDICAL FOR DSG CHANGE L/HAND 4TH DIGIT. NAIL APPROX 30%
ATTACHED, NEW NAIL COMMING IN, NO S/S OF INFECTION. SITE CLEANED WITH WOU
ND CLEANSER AND TAO APPLIED, COVERED WITH BAND AID. I/M TOLERATED IT WELL.
LEFT MEDICAL IN NO DISTRESS.

SIGNED OFF ON 04/12/12 @ 11:12 BY RICHARD MINICK, REGISTERED NURSE I

ENCOUNTER: 453 FOLLOW-UP SICK CALL 04/11/12 8:43 LEE COMP

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INMATE TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. INMATE REMOVED BANDAGE PRIOR TO COMING TO MEDICAL. INMATE STATED THERE WAS A SMALL AMOUNT OF YELLOWISH/CLEAR DRAINAGE. FINGER WAS CLEANED WITH WOUND CLEANSER AND 2X2 APPLIED AND SECURED FROM HYPAFIX. INMATE TOLERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS NOTED.

SIGNED OFF ON 04/11/12 @ 8:51 BY MELISSA S MCDUFFIE, LICENSED PRACTICAL NURSE

** ENCOUNTER: 452 FOLLOW-UP SICK CALL 04/10/12 11:26 LEE COMP
I/M PRESENTED TO MEDICAL FOR DSG CHANGE L/HAND 4TH DIGIT, SITE CLEANED WITH WOUND CLEANSER, HYDROGEN PEROXIDE AND FLUSHED WITH STERILE NS, TAO APPLIED TO NAIL CUTICAL AND COVERED WITH 2X2 AND HYPAFIX TAPE. I/M TOLERATED IT WELL, LEFT MEDICAL IN NO DISTRESS.
SIGNED OFF ON 04/10/12 @ 11:28 BY RICHARD MINICK, REGISTERED NURSE I

** ENCOUNTER: 451 FOLLOW-UP SICK CALL 04/09/12 11:00 LEE COMP
INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. NAIL IS LOOSE, SLIGHT EDEMA TO BEHIND NAIL BED ON TOP OF FINGER, NO ERYTHEMA. SCANT CLEAR YELLOW DRAINAGE FROM NAIL BED. CLEANSER WITH WOUND CLEANSER, APPLIED TAO, COVERED WITH 2X2 GAUZE, AND STRETCH WRAP. INMATE TOLERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.
SIGNED OFF ON 04/09/12 @ 11:02 BY WANDA K FULTON, REGISTERED NURSE I

** ENCOUNTER: 450 FOLLOW-UP SICK CALL 04/08/12 10:35 LEE COMP
S> INMATE INTO MEDICAL FOR DRSG CHANGE TO 4TH FINGER LEFT HAND. AREA CLEANED WITH 202, BETADINE AND RINSED WITH NS. TAO APPLIED TO GAUZE AND TAPED WITH HYPAFIX. NO S/SX'S OF INFECTION NOTED. INMATE TOL PROCEDURE WELL.
O> TEMP=000.0 PULSE= 0 RESP= 0 BP= 0/ 0 WEIGHT= 0 PPD= 0
A> JANDERSON, RN
SIGNED OFF ON 04/08/12 @ 10:37 BY JACQUELINE M ANDERSON, REGISTERED NURSE I

** ENCOUNTER: 449 FOLLOW-UP SICK CALL 04/07/12 15:26 LEE COMP
I/M PRESENTED TO MEDICAL FOR DSG CHANGE L/HAND 4TH FINGER. SITE CLEANED WITH HYDROGEN PEROXIDE, AND BETADINE, FLUSHED WITH NS, TAO APPLIED, COVERED WITH 2X2 AND HYPAFIX TAPE. I/M TEACHING CONDUCTED ON S/S OF INFECTION, I/M VERBALIZED UNDERSTANDING AND LEFT MEDICAL IN NAD.
SIGNED OFF ON 04/07/12 @ 15:28 BY RICHARD MINICK, REGISTERED NURSE I

** ENCOUNTER: 448 FOLLOW-UP SICK CALL 04/06/12 13:00 LEE COMP
INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. INMATE LEFT RING FINGER NAIL IS SLIGHTLY LOOSE. SCANT AMOUNT OF DRAINAGE. NO ERYTHEMA OR EDEMA. CLEANSER WITH WOUND CLEANSER, APPLIED TAO, AND COVERED WITH 2X2 GAUZE AND STRETCH WRAP. INMATE TOLERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.
SIGNED OFF ON 04/06/12 @ 13:02 BY WANDA K FULTON, REGISTERED NURSE I

** ENCOUNTER: 447 NARRATIVE 04/06/12 12:46 LEE COMP
I/M WAS A NO SHOW FOR A DRESSING CHANGE.
SIGNED OFF ON 04/06/12 @ 12:47 BY KIM T ALLEYNE, UNCLASSIFIED

** ENCOUNTER: 446 FOLLOW-UP SICK CALL 04/05/12 11:04 LEE COMP

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INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. INMATE NAIL SLIGHTLY LOOSE WITH SCANT CLEAR DRAINAGE. SLIGHT EDEMA WITH NO EYTHEMA. CLEANSED WITH WOUND CLEANSER, APPLIED TAO, AND COVERED WITH 2X2 GUAZE AND STRETCH WRAP. INMATE TOLERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 04/05/12 @ 11:07 BY WANDA K FULTON, REGISTERED NURSE I

- ** ENCOUNTER: 445 PPD 04/04/12 13:29 LEE COMP
TST PLANTED LFA 03/23/12 READ 03/26/12 OMM
SIGNED OFF ON 04/04/12 @ 13:29 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I
- ** ENCOUNTER: 444 FOLLOW-UP SICK CALL 04/04/12 9:25 LEE COMP
I/M PRESENTED TO MEDICAL FOR DSG CHANGE L/RING FINGER, SMALL AMOUNT OF PURULANT DRAINAGE FROM TOP OF NAIL AREA, APPROX 3/4 OF INTERIOR PORTION OF NAIL IS NOT ATTACHED TO NAIL BED. SITE CLEANED WITH HYDROGEN PEROXIDE AND WOUND CLEANSER, ANTIBIOTIC OINT APPLIED, COVERED WITH 2X2 AND HYPAFIX TAPE. I/M TOLERATED IT WELL. LEFT MEDICAL IN NO DISTRESS.
SIGNED OFF ON 04/04/12 @ 9:28 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 443 FOLLOW-UP SICK CALL 04/03/12 9:41 LEE COMP
I/M REPORTED TO MEDICAL FOR DRESSING CHANGE TO THE LEFT FINGER. FINGER RED, SWOLLEN, SCANT AMOUNT OF YELLOW DRAINAGE NOTED. FINGER CLEANED, TAO APPLIED AND COVERED WITH 2X2 GAUZE AND KERLEX. I/M TOLERATED THE PROCEDURE WELL.
T. HUBBARD, LPN
SIGNED OFF ON 04/03/12 @ 9:48 BY TONYNA HUBBARD, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 442 FOLLOW-UP SICK CALL 04/01/12 9:33 LEE COMP
I/M STS THAT 4TH DIGIT CONTINUES TO HAVE PURULENT DISCHARGE. STS PAIN LEVEL 5/6 THROBBING PAIN.
FINGER IS RED AND SWOLLEN AT THE PROXIMAL END.
WOUND CLEANER 2X2 GAUZE APPLIED ANTIBACTERIAL OINMENT APPLIED LING WRAP.
SIGNED OFF ON 04/01/12 @ 9:51 BY LESLIE WILSON, REGISTERED NURSE I
NOTED
SIGNED OFF ON 04/02/12 @ 12:31 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 441 FOLLOW-UP SICK CALL 03/31/12 9:35 LEE COMP
INMATE T MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. BANDAGE REMOVED A SMALL AMOUNT OF YELLOWISH? CLEAR DRAINAGE NOTED. INMATE DENIES PAIN AT PRESENT AT SITE. NO REDNESS OR SWELLING NOTED, SKIN WAS PINK AND WARM AND DRY. FINGER WAS CLEANED AND TAO WAS APPLIED AND FINGER WAS COVERED WITH 2X2 GAUZE AND STRETCH. INMATE TOLERATED WELL. INMATE LEFT MEDICAL NO ACUTE DISTRESS NOTED.
SIGNED OFF ON 03/31/12 @ 9:42 BY MELISSA S MCDUFFIE, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 440 FOLLOW-UP SICK CALL 03/30/12 13:35 LEE COMP
INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. INMATE HAS SCANT AMOUNT OF YELLOW/CLEAR DRAINAGE FROM UNDER NAIL. CLEANSED WITH WOUND CLEANSER, APPLIED TAO, AND COVERED WITH 2X2 GUAZE, AND STRETCH WRAP. INMATE TOLERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.
SIGNED OFF ON 03/30/12 @ 13:37 BY WANDA K FULTON, REGISTERED NURSE I

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- ** ENCOUNTER: 439 FOLLOW-UP SICK CALL 03/29/12 11:31 LEE COMP
INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. INMATE HAS SCANT AMOUNT OF YELLOW DRAINAGE COMING FROM BELOW NAIL BED. NO ERYTHEMA. CLEANSERED WITH WOUND CLEANSER, APPLIED TAO, COVERED WITH 2X2 GUAZE, AND WRAPPED WITH STRETCH WRAP. INMATE TOLERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.
SIGNED OFF ON 03/29/12 @ 11:33 BY WANDA K FULTON, REGISTERED NURSE I
- ** ENCOUNTER: 438 FOLLOW-UP SICK CALL 03/28/12 11:08 LEE COMP
INMATE TO MEDICAL FOR DRESSING TO LEFT RING FINGER. NO REDNESS, SWELLING OR DRAINAGE NOTED AT WOUND SITE. WOUND WAS CLEANED WITH WOUND CLEANSER AND DRESSED. INMATE TOLERATED DRESSING CHANGE WELL. INMATE LEFT MEDICAL WITH NO SIGNS OF ACUTE DISTRESS NOTED
SIGNED OFF ON 03/28/12 @ 11:18 BY MELISSA S MCDUFFIE, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 437 FOLLOW-UP SICK CALL 03/27/12 12:59 LEE COMP
INMATE REPORTED TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. BOTTOM OF NAIL BED OPEN. INMATE HAS AN AREA OF EDEMA AND ERYTHEMA APPROXIMATELY QUARTER SIZED ON TOP OF FINGER NEAR NAIL BED. BOTH AREAS HAVE YELLOW DRAINAGE. CLEANSERED WITH WOUND CLEANSER, APPLIED TAO, AND COVERED WITH 2X2 GUAZE AND STRETCH BANDAGE. INMATE TOLERATED WELL. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.
SIGNED OFF ON 03/27/12 @ 13:01 BY WANDA K FULTON, REGISTERED NURSE I
- ** ENCOUNTER: 436 FOLLOW-UP SICK CALL 03/26/12 8:55 LEE COMP
I/M PRESENTED TO MEDICAL FOR DSG CHANGE L/HAND RING FINGER, SITE HAS SMALL AMOUNT OF SER/SANG DRAINAGE AT TOP OF NAIL, WITH LOCALIZED SWELLING AND REDNESS, SITE CLEANED WITH WOUND CLEANSER AND ANTIBIOTIC OINT APPLIED, COVERED WITH 2X2 AND HYPAFIX TAPE, I/M TOLERATED IT WELL, LEFT MEDICAL IN NO DISTRESS.
SIGNED OFF ON 03/26/12 @ 8:57 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 435 FOLLOW-UP SICK CALL 03/25/12 11:49 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE. REMOVED OLD DRESSING FROM LEFT HAND 2ND FINGER. CLEANSERED WITH WOUND CLEANSER. APPLIED TAO AND RECOVERED WITH BAND-AID.
SIGNED OFF ON 03/25/12 @ 11:49 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 434 FOLLOW-UP SICK CALL 03/24/12 10:34 LEE COMP
I/M PRESENTED TO MEDICAL FOR DSG CHANGE L/RING FINGER, NO DRAINAGE NOTED FROM SITE, SMALL OPEN AREA ON NAIL CUTICLE, CLEANED WITH WOUND CLEANSER, ANTIBIOTIC OINT APPLIED, COVERED WITH 2X2 AND HYPAFIX TAPE.
SIGNED OFF ON 03/24/12 @ 10:35 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 433 FOLLOW-UP SICK CALL 03/20/12 13:33 LEE COMP
INMATE PRESENTED TO MEDICAL FOR DRESSING CHANGE TO FINGER AND TO INQUIRE ABOUT XRAY RESULTS ON LEFT KNEE. OLD DRESSING CONTAINED SMALL AMOUNT OF BLOODY DRAINAGE. FINGER WAS CLEANED WITH DEEP WOUND CLEANER. TAO AND GAUZE WAS APPLIED, SECURED WITH TUBULAR GAUZE AND TAPE. INMATE LEFT MEDICAL

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IN STABLE CONDITION.

P> METHOCARBAMOL 750MG

SIG: ONE PO BID

SIG:

START DATE: 03/20/12 TOTAL DAYS: 180

MD: STEEN, RONALD G

NAPROXEN 500MG

SIG: ONE PO BID

SIG:

START DATE: 03/20/12 TOTAL DAYS: 180

MD: STEEN, RONALD G

PER V.O. STEEN, MD:

METHOCARBAMOL 750 MG 1 BID

NAPROXEN 500 MG 1 BID

SIGNED OFF ON 03/20/12 @ 13:35 BY GWENDOLYN T STOKES, REGISTERED NURSE I

SIGNED OFF ON 03/20/12 @ 16:54 BY RONALD G STEEN, PHYSICIAN II

MARS UPDATED

SIGNED OFF ON 03/21/12 @ 15:31 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 432 NARRATIVE 03/20/12 12:47 LEE COMP
INMATE WAS A NO SHOW FOR DRESSING CHANGE.
SIGNED OFF ON 03/20/12 @ 12:48 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

ENCOUNTER: 431 FOLLOW-UP SICK CALL 03/19/12 16:51 LEE COMP
I/M 4TH LEFT DIGIT END OF FINGER AND FINGERNAIL BED CLEANED.
DRY DRESSING APPLIED AND SECURED WITH TAPE.
I/M TOLERATED DRESSING CHANGE WELL.
I/M LEFT MEDICAL IN NAD.
SIGNED OFF ON 03/19/12 @ 16:52 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
SIGNED OFF ON 03/20/12 @ 6:25 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 430 DOCTOR'S CLINIC 03/19/12 14:57 LEE COMP
I/M PRESENTS FOR FOLLOW UP OF HIS L RING FINGER NAIL. I/M HAS HAD A SUB-
UNGAL HEMATOMA SECONDARY TO CRUSH INJURY AND HAS DEVELOPED A PARANYCHIA
WHICH WAS INITIALLY TREATED WITH SEPTRA AND RIFAMPIN. APPEARED TO CLEAR
BUT THEN RECURRED AND WAS SEEN AND TREATED BY ME INITIALLY 3/13/12.

O: 98.6-85-20-120/70. WT-208.

WOUND APPEARS DRY WITH OLD DRIED PURULENT MATERIAL ON OLD DRESSING.

NAIL BED STILL APPEARS INTACT, BASE APPEARS SOMEWHAT WHITE AND SUSPECT
THAT THE NAIL WILL BE LOST.

A: PARANYCHIA WITH CRUSH INJURY TO L RING FINGER NAIL

P: WILL ADD RIFAMPIN 300 MG 1 PO BID X 10 DAYS.

TO CONTINUE DRY DRESSING CHANGE DAILY.

RIFAMPIN 300MG

SIG: TAKE 1 CAPSULE PO BID X 10 DAYS. DISP #20

SIG:

START DATE: 03/19/12 TOTAL DAYS: 10

MD: STEEN, RONALD G

SIGNED OFF ON 03/19/12 @ 15:16 BY RONALD G STEEN, PHYSICIAN II

SO NOTED

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SIGNED OFF ON 03/19/12 @ 16:35 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

- ** ENCOUNTER: 429 FOLLOW-UP SICK CALL 03/18/12 11:18 LEE COMP
IM PRESENTED TO MEDICAL FOR DSG CHANGE L/HAND RING FINGER, SMALL AMOUNT OF
PURULANT DRAINAGE FROM BED OF NAIL, ERYTHMEIA PROXIMAL TO NAIL BED, SITE C
LEANED WITH HYDROGEN PEROXIDE AND WOUND CLEANSER, ANTIOBIOTIC OINT APPLIED,
COVERED WITH 2X2 AND TAPE, AFFIXED TO FINGER WITH HYPAFIX TAPE, IM REPORTS
DSG NOT TIGHT. IM VERBALIZED UNDERSTANDING TO REPORT WORSENING S/S OF INFE
CTION. IM LEFT MEDICAL IN NAD.
SIGNED OFF ON 03/18/12 @ 11:22 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 428 TELEPHONE ENCOUNTER 03/18/12 10:53 LEE COMP
CALLED DAR OFFICER HAYES, ASK FOR IM TO BE SENT TO MEDICAL FOR DSG CHANGE,
OFFICER REPLIED OKAY, THEN HUNG UP. CALLED PLACED AT 1055
SIGNED OFF ON 03/18/12 @ 10:54 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 427 NARRATIVE 03/17/12 11:52 LEE COMP
NO SHOW FOR DSG CHANGE TO LT RING FINGER. CALL PLACED TO DORM BY OFFICER
BRADBY X 2, STILL NO SHOW FOR APPT TODAY. J. SOVACOO, RN.
SIGNED OFF ON 03/17/12 @ 11:52 BY JILL SOVACOO, REGISTERED NURSE I
CALL RECEIVED FROM OFFICER IN DORM, NOT ABLE TO RELEASE I/M TO MEDICAL IN
AM D/T NO TIME, SENT TO MEDICAL THIS PM FOR DAILY DSG CHANGE. ARRIVED WITH
BANDAID TL LT 4TH DIGIT, STATED PLACED ONTO FINGER AFTER SHOWERING. MINUTE
AMT DRIED SANGUINOUS DRAINAGE OBSERVED ON BANDAID. TINY MACERATED REDDENED
AREA TO PROXIMAL END FIRST DIGIT JOINT NOTED S DRAINAGE, AREA OF CUTICLE
SURROUNDING NAIL SOMWHAT EDEMAEIOUS, SMALL AMT DRIED DARY YELLOWISH DRAIN-
AGE NOTED. AREA CLEANED WITH WOUND CLEANSER, WRAPPED IN GAUZE 4X4 AND 2"
CLING APPLIED, TOLERATED WELL. INSTRUCTED TO REMOVE AND LOOSEN DSG PRN
ANY ONSET PARASTHESIAS, RTM DAILY FOR DSG CHANGES PER MD ORDER UNTIL HEALED
VERABLIZED UNDERSTANDING AND INTENTION TO COMPLY. J. SOVACOO, RN.
SIGNED OFF ON 03/17/12 @ 14:24 BY JILL SOVACOO, REGISTERED NURSE I
- ** ENCOUNTER: 426 FOLLOW-UP SICK CALL 03/14/12 11:48 LEE COMP
INMATE HERE FOR DRESSING CHANGE RING FINGER LEFT HAND. FINGER EDEMAEIOUS,
DARK DISCOLORATION BELOW NAIL BED NOTED LENGTH OF PHALANGE. DRIED PURULENT
EXUDATE NOTED AROUND BASE OF NAIL BED. INMATE C/O SEVERE PAIN. REPORTS
HE DID NOT START HIS ANTIBIOTIC YET. VO DR STEEN WILL NEED FINGER LANCED.
#15 SCAPLE USED, SEROSANGUINOUS FLUID MODERATE AMOUNT NOTED, TOLERATED WELL
REPORTS HE FEELS MUCH BETTER. AWAITING DOXYCYCLINE ARRIVAL. VO DR STEEN
FOR AUGMENTIN 875 PO BID X 3 DAYS UNTIL MEDICATION ARRIVES FROM KIRKLAND.
INMATE EDUCATION CONCERNING MEDICATION ADMINISTRATION AND TO REPORT IF HIS
DOXYCLINE DOES NOT ARRIVE AFTER THREE DAYS. MAY NOT HAVE TERMINATION OF O
NE ANTIBIOTIC WITHOUT BEGINNING THE OTHER. INMATE UNDERSTANDS ALL DIRECTIO
NS. DAILY DRESSING CHANGES. PLACED ON LISTING WITH MS BROWN. INMATE HAS
STARTER PACK ON HIS PERSON. Y MCDONALD, RN.
SIGNED OFF ON 03/14/12 @ 12:03 BY YVONNE MCDONALD, NURSE ADMINISTRATOR/MGR
SIGNED OFF ON 03/19/12 @ 9:47 BY RONALD G STEEN, PHYSICIAN II
- ** ENCOUNTER: 425 FOLLOW-UP SICK CALL 03/13/12 12:19 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE. I/M STATES FINGER IS SWELLING UP

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AGAIN AND IS HURTING AGAIN.

REMOVED DRESSING. LEFT HAND 4TH FINGER. AREA AROUND CUTICLE SWELLING, RED, AND PAINFUL TO TOUCH. YELLOW PURULENT DRAINAGE UNDER NAILBED AT CUTICLE. I/M STATES HE CAN SQUEEZE OUT PUSS AT TIMES.

I/M EVALUATED BY DR. STEEN.

V.O. DR. STEEN:

- I/M NOT TO SQUEEZE FINGER ANYMORE, ATTEMPT TO OBTAIN CULTURE C&S ON DRAINAGE TOMORROW.

- DOXYCYCLINE 100MG PO BID X 14 DAYS.

- WOUND CLEANSER ONLY WITH DRY DRESSING TO FINGER.

- F/U WITH DR. STEEN WED. 3-14-12.

I/M GIVEN INSTRUCTIONS NOT TO SQUEEZE FINGER SO THAT NURSES MAY ATTEMPT CULTURE TOMORROW. I/M VERBALIZED UNDERSTANDING.

I/M ISSUED PILL LINE PASS TO RECEIVE STARTER PACK OF DOXYCYCLINE.

AREA CLEANED WITH WOUND CLEANSER AND DRY DRESSING APPLIED AND SECURED WITH TAPE, I/M TOLERATED DRESSING WELL.

NOTED ON SCHEDULE FOR CULTURE AND MD F/U.

DOXYCYCLINE CAPSULES 100MG

SIG: TAKE ONE BY MOUTH TWICE DAILY

SIG:

START DATE: 03/13/12 TOTAL DAYS: 14

MD: STEEN, RONALD G

SIGNED OFF ON 03/13/12 @ 12:27 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE

SIGNED OFF ON 03/15/12 @ 10:17 BY RONALD G STEEN, PHYSICIAN II

MARS UPDATED

SIGNED OFF ON 03/15/12 @ 15:50 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 424 FOLLOW-UP SICK CALL 03/12/12 11:19 LEE COMP
I/M TO MEDICAL. REMOVED DRESSING FROM FINGER. SMALL AMT OF YELLOW DRAINAGE NOTED TO OLD DRESSING. SMALL AMT OF YELLOW DRAINAGE NOTED TO CUTICLE AND JUST UNDER NAIL AT CUTICLE AREA. WOUND CLEANED. TAO APPLIED. AREA COVERED WITH DRY DRESSING AND SECURED DRESSING WITH TAPE. I/M TOLERATED DRESSING CHANGE WELL AND LEFT MEDICAL IN NAD.
SIGNED OFF ON 03/12/12 @ 11:23 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
SIGNED OFF ON 03/12/12 @ 15:44 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 423 NARRATIVE 03/11/12 13:15 LEE COMP
I/M PRESENT FOR DSG. CHANGE TO LEFT HAND FOURTH DIGIT. AREA NOTED TO WITH SLIGHT EDEMA AND REDNESS. NO DRAINAGE OR FOUL ODOR. AREA CLEANSE WITH WD. CLEANSER APPLIED TAO AND SECURE WITH GAUZE AND HYPAFIX. WILL CONTINUE TO MONITOR.
SIGNED OFF ON 03/11/12 @ 13:17 BY KEISHA S YARBOROUGH, REGISTERED NURSE I

** ENCOUNTER: 422 FOLLOW-UP SICK CALL 03/10/12 11:58 LEE COMP
IM PRESENTED TO MEDICAL FOR DSG CHANGE L/HAND FOURTH FINGER, SUPERFICIAL AB RASION AT 2ND KNUCKLE. NO DRAINAGE FROM SITE, FINGER CLEANED WITH WOUND CLEANSER WITH ANTIBIOTIC APPLIED, COVERED WITH 4X4 AND HYPAFIX TAPE. NO S/S OF INFECTION, NO CAP REFILL NOTED UNDER FINGERNAIL BUT AT TIP OF FINGER < 3 S EC, IM MAY LOOSE FINGER NAIL. IM TOLERATED TX WELL, LEFT IN NAD.
SIGNED OFF ON 03/10/12 @ 12:02 BY RICHARD MINICK, REGISTERED NURSE I

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- ** ENCOUNTER: 421 FOLLOW-UP SICK CALL 03/06/12 12:52 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE. NO DRAINAGE NOTED FROM WOUND.
WOUND AREA CLEANED. APPLIED TAO AND DRY DRESSING. I/M TOLERATED
DRESSING CHANGE WELL AND LEFT MEDICAL IN NAD.
SIGNED OFF ON 03/06/12 @ 12:55 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
IM ON SCHEDULING NEEDS LIST FOR DSG CHANGES.
SIGNED OFF ON 03/07/12 @ 9:19 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 420 FOLLOW-UP SICK CALL 03/04/12 16:08 LEE COMP
DRESSING TO LEFT MIDDLE FINGER IS CHANGED WITH A SMALL AMOUNT OF YELLOW
DRAINAGE ON OLD BANDAGE
SIGNED OFF ON 03/04/12 @ 16:10 BY TERESA D LOWE, REGISTERED NURSE I
- ** ENCOUNTER: 419 FOLLOW-UP SICK CALL 03/03/12 16:00 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE SMALL AMOUNT OF YELLOW DRAINAGE ON OLD
DRESSING YELLOW AREA UNDER NAIL BED. NEW DRESSING APPLIED TOL WELL
SIGNED OFF ON 03/04/12 @ 16:08 BY TERESA D LOWE, REGISTERED NURSE I
- ** ENCOUNTER: 418 FOLLOW-UP SICK CALL 03/02/12 11:57 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE. REMOVED BANDAIDS FROM FINGER.
SMALL AMT OF YELLOWISH DRAINAGE NOTED TO BANDAIDS. CLEANED FINGER.
SMALL AMT OF PUS NOTED TO EDGE OF NAIL BED AND UNDER NAIL. APPLIED TAO
AND COVERED WITH CLEAN BANDAIDS. I/M TOLERATED DRESSING WELL AND LEFT
MEDICAL IN NAD.
SIGNED OFF ON 03/02/12 @ 11:59 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
SIGNED OFF ON 03/04/12 @ 17:55 BY TERESA D LOWE, REGISTERED NURSE I
- ** ENCOUNTER: 417 FOLLOW-UP SICK CALL 02/29/12 11:39 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE THERE IS STILL PUS WHICH HE SQUEZZES
FROM THE END OF THE FOURTH FINGER.
AREA IS CLEANED AND NEW DRESSING IS APPLIED
THE FOLLOWING V.O. IS RECIEVED PER DR. TOMARCHIO, MD/T. LOWE, RN
RIFAMPIN 300MG
SIG: 2 CAPSULES DAILY
SIG:
START DATE: 02/29/12 TOTAL DAYS: 7
MD: TOMARCHIO, JOHN B.
SEPTRA DS
SIG: TAKE ONE TABLET TWICE A DAY X 7 DAYS
SIG:
START DATE: 02/29/12 TOTAL DAYS: 7
MD: TOMARCHIO, JOHN B.
SIGNED OFF ON 02/29/12 @ 11:42 BY TERESA D LOWE, REGISTERED NURSE I
SIGNED OFF ON 03/01/12 @ 11:31 BY JOHN B TOMARCHIO, PHYSICIAN II
SIGNED OFF ON 03/04/12 @ 17:33 BY TERESA D LOWE, REGISTERED NURSE I
MARS UPDATED
SIGNED OFF ON 03/06/12 @ 12:14 BY SANDRA T JONES, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 416 X-RAY 02/28/12 14:05 LEE COMP

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XRAY RESULTS

LEFT KNEE, 3 VIEWS

IMPRESSION:

STABLE APPEARANCE OF THE KNEE WITH MILD NARROWING OF THE MEDIAL COMPARTMENT OF THE KNEE JOINT.

WILL FORWARD RESULT TO MD FOR REVIEW AND PLACE ORIGINAL IN MD BOX.

SIGNED OFF ON 02/28/12 @ 14:06 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
FU SICK CALL PRN.

SIGNED OFF ON 03/05/12 @ 9:59 BY JOHN B TOMARCHIO, PHYSICIAN II

SIGNED OFF ON 03/07/12 @ 19:04 BY GWENDOLYN T STOKES, REGISTERED NURSE I

- ** ENCOUNTER: 415 FOLLOW-UP SICK CALL 02/28/12 10:39 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE. NO DRESSING NOTED TO FINGER.
LEFT HAND 4TH DIGIT. SKIN TO END OF FINGER FROM 2ND KNUCKLE PINK.
DRIED GREENISH DRAINAGE NOTED AROUND CUTICLE OF FINGERNAIL BED.
END OF FINGER CLEANED. TAO APPLIED. COVERED AREA WITH DRY DRESSING AND
SECURED DRESSING WITH TAPE. I/M TOLERATED DRESSING CHANGE WELL AND LEFT
MEDICAL IN NAD.
SIGNED OFF ON 02/28/12 @ 10:45 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURSE
SIGNED OFF ON 02/28/12 @ 17:26 BY TERESA D LOWE, REGISTERED NURSE I
- ** ENCOUNTER: 414 NARRATIVE 02/26/12 10:17 LEE COMP
IM REPORTED TO MEDICAL FOR DSG CHANGE L HAND 4TH DIGIT, NO PURULENT DRAINAG
E ON OLD DSG, SMALL AREA AT NAIL LINE WITH TOP LAYER DERMIS OFF DUE TO "PUL
LED OFF WITH BANDAID YESTERDAY" PER INMATE REPORT. NO S/S OF INFECTION. SIT
E CLEANED WITH PEROXIDE, WOUND CLEANSER, APPLIED ANTIBIOTIC ONIT AND COVERE
D WITH TEFLA AND 4X4 AND LARGE BANDAID. IM VERBALIZED UNDERSTANDING TO KEE
P SITE DRY AND REPORT S/S OF INFECTION. LEFT MEDICAL NO DISTRESS.
SIGNED OFF ON 02/26/12 @ 10:22 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 413 FOLLOW-UP SICK CALL 02/25/12 10:37 LEE COMP
DRESSING IS APPLIED TO THE 4TH DIGIT OF THE LEFT HAND THERE IS NO DRAINAGE
PRESENT .
SIGNED OFF ON 02/25/12 @ 10:38 BY TERESA D LOWE, REGISTERED NURSE I
- ** ENCOUNTER: 412 NARRATIVE 02/24/12 11:52 EVANS COMP
INMATE REPORTED TO MEDICAL IN NO DISTRESS FOR DSG CHANGE L/RING FINGER, SIT
E CLEANED WITH WOUND CLEANSER AND COVERED WITH BANDAID. NO S/S OF INFECTIO
N, FINGER MOTTLED WITH SUBCUTANIOUS BLOOD AND IS PART OF THE HEALING PROCES
S.
SIGNED OFF ON 02/24/12 @ 11:54 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 411 X-RAY 02/24/12 10:55 EVANS COMP
LT KNEE X-RAY DONE.
SIGNED OFF ON 02/24/12 @ 10:55 BY DEBORAH L PARRISH, TECHNICAL MEDICAL ASSO I
- ** ENCOUNTER: 410 DOCTOR'S CLINIC 02/23/12 12:56 LEE COMP
INMATE TO MEDICAL IN TO SEE MD FOR F/U
MD ASSESSMENT COMPLETED.
V/O INMATE TO CONT. ABT UNTIL ALL COMPLETED DR TOMARCHIO MD/BWILLIAMS RN

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SIGNED OFF ON 02/23/12 @ 13:00 BY BRENDA WILLIAMS, REGISTERED-NURSE I.
NOTED

SIGNED OFF ON 02/28/12 @ 13:50 BY BENJAMIN F LEWIS JR, PHYSICIAN II

- ** ENCOUNTER: 409 INSIDE APPOINTMENT 02/22/12 14:48 LEE COMP
INMATE TO MEDICAL FOR DAILY DRESSING CHANGE DRESSING LT RING FINGER,
SMALL AMOUNT OF YELLOW DRAINAGE NOTED TO OLD DRESSING, FINGER NOTED TO BE
DISCOLORED, RED/BLACKENED AREAS, SCABBED AND DRYING, BRISK CAP REFILLS.
AREA CLEANED WITH WOUND CLEANSER TAO APPLIED COVERED WRAPPED WITH OPENED
4X4 SECURED WITH HYPAFIX TAPE. NO DISTRESS NOTED. BWILLIAMS RN
SIGNED OFF ON 02/22/12 @ 15:03 BY BRENDA WILLIAMS, REGISTERED NURSE I
- ** ENCOUNTER: 408 FOLLOW-UP SICK CALL 02/21/12 11:02 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER. REMOVED BANDAID
COVERING AREA. SCANT AMT OF YELLOWISH DRAINAGE TO BANDAID. FINGER IS
DISCOLORED FROM SLIGHTLY BELOW 2ND KNUCKLE. PURULENT COLOR AROUND THE
TOP OF FINGERNAIL BED. SMALL BLACKENED AREA TO SIDE OF FINGER. PINK AND
FLESH COLORED TO REST OF WOUND AREA. TOTAL WOUND AREA SKIN HAS SCAB LIKE
TEXTURE. I/M DENIES PAIN AT PRESENT, STATES " IT FEELS KINDA NUMB. "
CAPILLARY REFILL GOOD TO TIP OF LEFT RING FINGER. I/M STATES HE IS TAKING
ANTIBIOTICS AS ORDERED. WOUND AREA CLEANED WITH WOUND CLEANSER. TAO APPLIED
TO AREA. WOUND WRAPPED WITH STERILE 2X2. DRESSING SECURED WITH KLING WRAP
AND TAPE. I/M TOLERATED DRESSING CHANGE WELL AND LEFT MEDICAL IN NAD.
SIGNED OFF ON 02/21/12 @ 11:08 BY STEPHANIE M BROWN, LICENSED PRACTICAL NURS
SIGNED OFF ON 02/23/12 @ 8:35 BY JOHN B TOMARCHIO, PHYSICIAN II
- ** ENCOUNTER: 407 FOLLOW-UP SICK CALL 02/20/12 10:17 LEE COMP
INMATE PRESENTED TO MEDICAL FOR DRESSING CHANGE TO RIGHT RING FINGER. OLD
BANDAID CONTAINED SMALL AMOUNT OF YELLOWISH DRAINAGE. AREA CLEANED WITH
DEEP WOUND CLEANER. ABLE TO EXPRESS SMALL AMOUNT OF PURULENT DRAINAGE.
TAO AND TUBULAR GAUZE APPLIED, SECURED WITH HYPAFIX TAPE. LEFT MEDICAL IN
STABLE CONDITION.
SIGNED OFF ON 02/20/12 @ 10:19 BY GWENDOLYN T STOKES, REGISTERED NURSE I
- ** ENCOUNTER: 406 NARRATIVE 02/19/12 13:19 LEE COMP
INMATE REPORTED TO MEDICAL FOR DSG CHANGE RIGHT RING FINGER, SITE CLEANED W
ITH WOUND CLEANER, ANTIBIOTIC OINT APPLIED, COVERED WITH BANDAID. NO S/S OF
INFECTION, NO DRAINAGE FROM SITE, SMALL AMOUNT OF SERIOUS FLUID AT TOP OF
NAIL, PT TOLERATED IT WELL, LEFT MEDICAL IN NO DISTRESS. PT VERBALIZED TEAC
HING OF FINGER CARE AND S/S OF INFECTION TO REPORT.
SIGNED OFF ON 02/19/12 @ 13:21 BY RICHARD MINICK, REGISTERED NURSE I
- ** ENCOUNTER: 405 FOLLOW-UP SICK CALL 02/18/12 12:09 LEE COMP
I/M TO MEDICAL FOR DRESSING CHANGE TO LEFT RING FINGER SMALL AMOUNT OF BLOO
DY DRAINAGE EXPRESSED. ENTIRE FINGER FROM THE 2ND KNUCKLE DOWN IS DARK AND
I/M STATES THAT IT BECAME THAT WAY AFTER HE SQUEEZED THE PUS OUT OF IT THIS
AND BAND-AID APPLIED
SIGNED OFF ON 02/18/12 @ 12:23 BY TERESA D LOWE, REGISTERED NURSE I
- ** ENCOUNTER: 404 NARRATIVE 02/17/12 9:46 LEE COMP

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INMATE REPORTED TO MEDICAL FOR DSG CHANGE L RING FINGER. IM IN NO DISTRESS, CLEANED SITE WITH WOUND CLEANER. SITE HAS SERO/SANG DRAINAGE OF APPROX 1CC. FINGER HAS EDEMA TO FIST DIGIT, NAIL IS INTACT AND CAP REFILL <3SEC. RES T OF HAND IS OF NORMAL COLOR FOR RACE, NO INDICATION OF SPREADING OF INFECTION. SITE WRAPPED WITH 4X4 AND TAPE. IM TEACHING CONDUCTED ON S/S TO REPORT AND METHODS OF CARE. INMATE AMBULATED FROM MEDICAL TO DORM IN NO DISTRESS

SIGNED OFF ON 02/17/12 @ 9:50 BY RICHARD MINICK, REGISTERED NURSE I

** ENCOUNTER: 403 INSIDE APPOINTMENT 02/16/12 14:55 LEE COMP
INMATE TO MEDICAL FOR DAILY DRESSING CHANGE, NOTED TO HAVE MODERATE AMT OF DRAINAGE, REPORTS HE HAS SQUEEZED ALOT OUT THIS MORNING. AREA CLEANED WITH DERMAL WOUND CLEANSER. TAO APPLIED COVERED WITH BAND-AID. INMATE IN NO DISTRESS NOTE. STATES "I AM STILL TAKING MY ABT" INSTRUCTED TO TAKE ALL MEDS. VERBALIZED UNDERSTANDING. B.WILLIAMS RN
SIGNED OFF ON 02/16/12 @ 15:00 BY BRENDA WILLIAMS, REGISTERED NURSE I

** ENCOUNTER: 402 FOLLOW-UP SICK CALL 02/15/12 9:28 LEE COMP
INMATE REPORTED TO MEDICAL FOR DSG CHANGE OF L RING FINGER, INMATE REPORTD "ALOT" OF DRAINAGE, STATES PAIN IS A 4 ON 0-10 SCALE. ALSO STATED HAND WAS ITCHING. INMATE IN NO DISTRESS, STATED THAT HIS ANTIBIOTICS WERE DUE TO COME IN TODAY. TEACHING CONDUCTED ON IMPORTANCE OF TAKING MEDICATIONS AND REPORTING S/S OF INFECTION. PT VERBALIZED UNDERSTANDING. DSG CHANGED WITH 4X4 AND TAPE. PT LEFT MEDICAL IN NO DISTRESS.
SIGNED OFF ON 02/15/12 @ 10:52 BY RICHARD MINICK, REGISTERED NURSE I

** ENCOUNTER: 401 EMERGENCY OUTSIDE 02/13/12 8:27 LEE COMP
S> "MY FINGER HURTS SO BAD. I DID N'T DO NOTHING TO IT, IT JUST HURTS."
INMATE REPORTS PAIN X 2 DAYS.
O> TEMP=99.7 PULSE= 86 RESP=20 BP=110/ 70 WEIGHT=205 PPD= 0
INMATE IS A 47 YEAR OLD BM WITH ERYTHEMA AND EDEMA OF RING FINGER LEFT HAND. FINGER IS INFECTED. NOTED YELLOWISH DISCOLORATION WHICH IS MOST LIKELY PURULENT EXUDATE UNDER SKIN AROUND NAIL. ERYTHEMA EXTENDS DOWN THE FINGER BEGINNING TO EXTEND INTO HIS HAND. DENIES ALLERGY TO ANTIBIOTICS. REPORTS SEVERE PAIN. FINGER IS HOT TO THE TOUCH, JOINT BETWEEN CARPAL AND METACARPAL IS SWOLLEN AND HE IS UNABLE TO BEND IT.
A> DEFER
VO DR TOMARCHIO FOR RIFAMPIN AND SEPTRA AS ORDERED ALONG WITH IBE FOR PAIN. MAY TAKE 1 OR 2 TABS PO FOR PAIN WITH FOOD. SCHEDULE FOR F?U RECHECK IN AM AND REFER TO MD IF NEEDED. Y MCDONALD, RN.
SIGNED OFF ON 02/13/12 @ 8:45 BY YVONNE MCDONALD, NURSE ADMINISTRATOR/MGR
NOTED
SIGNED OFF ON 02/13/12 @ 9:44 BY BENJAMIN F LEWIS JR, PHYSICIAN II
MARS UPDATED
SIGNED OFF ON 02/14/12 @ 13:17 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 400 NARRATIVE 02/10/12 13:14 LEE COMP
INMATE WAS A NO SHOW FOR F/U EAR
SIGNED OFF ON 02/10/12 @ 13:15 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

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** ENCOUNTER: 399 NARRATIVE 02/08/12 17:54 LEE COMP
INMATE TO MEDICAL ASKING ABOUT MEDICATION. IS ON CORTISPORIN EAR DROPS.
GAVE INMATE COTTON BALLS AND INSTRUCTIONS FOR USE. SENT A MESSAGE TO MS
FULTON FOR EAR RECHECK ON MONDAY. ALSO HAS WHAT APPEARS TO BE FUNGAL
GROWTH INSIDE RT EAR CANAL. TYMPANIC MEMBRANE INTACT WITHOUT ERYTHEMA OR
EDEMA. EAR CANAL WITH ERYTHEMA. INMATE C/O PAIN WHEN EAR PIECE IS INSERTED
D INTO THE EAR CANAL. REFUSED IBE FOR PAIN INMATE STATES HE HAS AN ULCER
AS IT BOTHERS HIS STOMACH. Y MCDONALD, RN.
SIGNED OFF ON 02/08/12 @ 17:57 BY YVONNE MCDONALD, NURSE ADMINISTRATOR/MGR

** ENCOUNTER: 398 EMERGENCY INHOUSE 02/07/12 10:13 LEE COMP
S> I/M TO MEDICAL WITH C/O OF EARACHE
O> TEMP=098.2 PULSE= 90 RESP=20 BP=124/ 66 WEIGHT=205 PPD= 0
I/M TO MEDICAL
FOUND OPEN INCOMPLETE!
SIGNED OFF ON 03/06/12 @ 17:22 BY RONALD G STEEN, PHYSICIAN II
SIGNED OFF ON 03/12/12 @ 16:46 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 397 NARRATIVE 02/07/12 10:03 LEE COMP
OFFICER CALLED FROM DORM THAT I/M IS C/O OF EARACHE AND FLUID LEAKING FROM
HIS EAR OFFICER INSTRUCTED TO SEND I/M TO MEDICAL.
SIGNED OFF ON 02/07/12 @ 10:07 BY TERESA D LOWE, REGISTERED NURSE I

** ENCOUNTER: 396 SICK CALL 01/31/12 13:17 LEE COMI
S> INMATE PRESENTED TO MEDICAL WITH MULTIPLE COMPLAINTS. THINKS HE HAS
H PYLORI AGAIN, NUMBNESS AROUND HOSE, DARK CIRCLE UNDER LEFT EYE, PAIN IN
BOTH KNEES, LEFT EAR HURTS, AND SINUS PROBLEMS.
O> TEMP=098.2 PULSE= 81 RESP=18 BP=144/ 76 WEIGHT=205 PPD= 0
47 YEAR OLD BLACK MALE. IN NO ACUTE DISTRESS. BP 144/76, DENIES HTN OR BP
MEDS. AMBULATION STEADY. A&O X 3. RESP EVEN AND NONLABORED. SKIN WARM AND
DRY. COLOR WNL. BILATERAL KNEE CREPITATION ON ROM. LEFT KNEE HAS MODERATE
AMOUNT OF EDEMA. DARK CIRCLE UNDER LEFT EYE; NO DARKNESS UNDER RIGHT EYE.
INMATE HAS BEEN TREATED PREVIOUSLY FOR H PYLORI. LUNGS CTA. HRRR. LEFT EAR
MEMBRANE VISIBLE, REDNESS WITH FLUID, TREATED WITH AMOXICILLIN 12/19/11.
P> 1. SEE S.O. #2
2. IF PATIENT HAS RHINORRHEA, RUNNY NOSE, GIVE CTM 4MG TID X 3 DAYS
MFORT. GIVE FROM A STOCK STANDING ORDER PACK. IF HEPATITIS C POSITIVE
GIVE IBUPROFEN 400MG 1 TAB QID X 3 DAYS. DOCUMENT MEDICATIONS GIVEN IN
AMR.
CTM 4 MG ISSUED
4. IF TEMPERATURE IS GREATER THAN 101 DEGREES F., GIVE TYLENOL 325MG 2 TABS
STAT AND RE-CHECK IN ONE HOUR. IF HEPATITIS C POSITIVE GIVE IBUPROFEN
400MG 2 TABS STAT AND RE-CHECK IN ONE HOUR. IF TEMPERATURE IS NOT LOWER
THAN 101 AT THAT TIME, CONSULT THE MD. DOCUMENT ALL MEDICATIONS GIVEN IN
AMR.
5. WARM COMPRESSES TO SINUS AREA FOR 20 MINUTES TID X 3 DAYS.
INSTRUCTED
6. IF SYSTOLIC B/P IS GREATER THAN 160 AND/OR DIASTOLIC B/P IS GREATER
THAN 100, CONSULT THE M.D.
7. DISCONTINUE SMOKING

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INSTRUCTED

INMATE VOICED UNDERSTANDING OF MEDICATION AND INSTRUCTIONS. ADVISED INMATE THAT INFORMATION WOULD BE FORWARDED TO MD/NP FOR REVIEW. NO GUARANTEE OF VISIT OR APPROVAL.

INMATE LEFT MEDICAL IN STABLE CONDITION.

SIGNED OFF ON 01/31/12 @ 13:25 BY GWENDOLYN T STOKES, REGISTERED NURSE I
MONITOR IM PRN IF SX'S CRYSTALLIZE OR WORSEN THE RECHECK, OTHERWISE PRN
SIGNED OFF ON 02/07/12 @ 8:12 BY RONALD G STEEN, PHYSICIAN II

** ENCOUNTER: 395 NARRATIVE 01/12/12 13:16 LEE COMP
INMATE WAS A NO SHOW FOR SICK CALL DO TO FORMAL COUNT.
SIGNED OFF ON 01/12/12 @ 13:16 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 394 NARRATIVE 01/06/12 11:38 LEE COMP
INMATE WAS A NO SHOW FOR SICK CALL.
SIGNED OFF ON 01/06/12 @ 11:38 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 393 EMERGENCY INHOUSE 12/19/11 12:10 LEE COMP
S> INMATE PRESENTED TO MEDICAL COMPLAINING WITH HIS LEFT EAR HURTING. STATES IT HAS BEEN RUNNING BLOODY STUFF ON HIS PILLOWCASE.

O> TEMP=097.4 PULSE= 90 RESP=20 BP= 90/ 60 WEIGHT=205 PPD= 0
47 YEAR OLD BLACK MALE. IN NO ACUTE DISTRESS. BP 90/60, DENIES HTN OR BP MEDS. AMBULATION STEADY. A&O X 3. SKIN WARM AND DRY. COLOR WNL. RIGHT EAR MEMBRANE VISIBLE WITH MINIMAL FLUID. LEFT EAR MEMBRANE VISIBLE, WITH FLUID AND SURROUNDING AREA REDNESS. WHITE SUBSTANCE PRESENT IN LEFT EAR.

A> LEFT EAR PAIN

P> PER V.O. RABON, NP:

BP 90/60 OKAY (INMATE IS NONSYMPTOMATIC)

AMOXICILLIN 500 MG 1 PO BID X 7 DAYS (STARTER ISSUED)

ADVISED INMATE TO NOTIFY MEDICAL IF CONDITION WORSENS OR DOES NOT IMPROVE AFTER COMPLETING FULL COURSE OF ANTIBIOTICS. INMATE VOICED UNDERSTANDING OF MEDICATION AND INSTRUCTIONS. LEFT MEDICAL IN STABLE CONDITION.

SIGNED OFF ON 12/19/11 @ 12:16 BY GWENDOLYN T STOKES, REGISTERED NURSE I

SIGNED OFF ON 12/19/11 @ 12:38 BY JUDY R RABON, NURSE PRACTITIONER III
SO NOTED

SIGNED OFF ON 12/19/11 @ 14:34 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 392 TELEPHONE ENCOUNTER 12/19/11 8:50 LEE COMP
OFFICER SHEPARD CALLED, STATED THAT INMATE'S EAR LOOKED LIKE IT HAD BLOOD INSIDE. ADVISED OFFICER TO SEND INMATE TO MEDICAL. OFFICER VOICED UNDERSTANDING.
SIGNED OFF ON 12/19/11 @ 8:50 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 391 TELEPHONE ENCOUNTER 12/18/11 10:07 LEE COMP
OFFICER DURANT CALLED, STATED INMATE WAS C/O EAR SWELLING UP. AFTER REVIEW OF AMR, INMATE WAS INSTRUCTED TO SIGN UP FOR SICK CALL. OFFICER VOICED UNDERSTANDING.

J. GUDVANGEN BSN, RN

SIGNED OFF ON 12/18/11 @ 10:08 BY JUSTIN R GUDVANGEN, UNCLASSIFIED

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** ENCOUNTER: 390 FOLLOW-UP SICK CALL 12/03/11 11:20 LEE COMP
INMATE TO MEDICAL FOR WOUND CHECK. INMATES WOUND TO BACK OF L THIGH NOW HEA
LED, NO GRANULATION PRESENT. INFORMED INMATE THAT SOME DRAINAGE OF "CLEAR,
YELLOWISH FLUID" MAY HAPPEN AS INTERNAL ASPECT HEALS. INMATE VERBALIZED UND
ERSTANDING, INSTRUCTED INMATE THAT NO FURTHER FOLLOWUP IS NECESSARY. INMATE
LEFT MEDICAL IN NO DISTRESS.

J. GUDVANGEN BSN, RN

SIGNED OFF ON 12/03/11 @ 16:38 BY JUSTIN R GUDVANGEN, UNCLASSIFIED

** ENCOUNTER: 389 FOLLOW-UP SICK CALL 12/01/11 12:55 LEE COMP
INMATE PRESENTED TO MEDICAL FOR WOUND CHECK. AREA ON LEFT BUTTOCK IS HEALED
OLD DRESSING DID NOT CONTAIN ANY DRAINAGE. INSTRUCTED INMATE TO CONTINUE
TAKING HIS ANTIBIOTICS AND KEEP AREA CLEAN AND DRY. INMATE VOICED
UNDERSTANDING. LEFT MEDICAL IN STABLE CONDITION.
SIGNED OFF ON 12/01/11 @ 12:56 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 388 FOLLOW-UP SICK CALL 11/30/11 10:29 LEE COMP
INMATE PRESENTED TO MEDICAL FOR A WOUND CHECK. BANDAID ON LEFT BUTTOCK HAD
SCANT AMOUNT OF YELLOWISH DRAINAGE. AREA CLEANED WITH DEEP WOUND CLEANER.
TAO AND BANDAID APPLIED. INMATE ISSUED ADDITIONAL BANDAIDS. SCHEDULE FOR
WOUND CHECK IN 3 DAYS (ENTERED ON SCHEDULING LIST). LEFT MEDICAL IN STABLE
CONDITION.
SIGNED OFF ON 11/30/11 @ 10:31 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 387 EMERGENCY INHOUSE 11/28/11 13:11 LEE COMP
S> INMATE PRESENTED TO MEDICAL COMPLAINING OF A BUMP ON HIS BUTTOCKS. STATES
IT HAS BEEN DRAINING AND VERY PAINFUL.

O> TEMP=097.8 PULSE= 88 RESP=18 BP=110/ 70 WEIGHT=205 PPD= 0
43 YEAR OLD BLACK MALE. IN NO ACUTE DISTRESS. VITALS WNL. AMBULATION
STEADY. RESP EVEN AND NONLABORED. SKIN WARM AND DRY. SMALL CARBUNCLE ON
LEFT BUTTOCK. AREA FIRM WITH NO ACTIVE DRAINAGE.

A> CARBUNCLE

P> RIFAMPIN 300MG
SIG: ONE PO BID X 10 DAYS (STARTER ISSUED DXD)
SIG:

START DATE: 11/28/11 TOTAL DAYS: 7

MD: RABON, JUDY R

SMZ/TMP 800/160MG

SIG: ONE PO BID X 10 DAYS (STARTER ISSUED DXD)

SIG:

START DATE: 11/28/11 TOTAL DAYS: 7

MD: RABON, JUDY R

PER V.O. RABON, NP:

RIFAMPIN 300 MG 1 PO BID X 10 DAYS (STARTER ISSUED DXD)

SMZ/TMP 800/160 MG 1 BID X 10 DAYS (STARTER ISSUED DXD)

SELF DRESSINGS (BAND-AIDS AND TAO ISSUED)

DAILY WOUND CHECKS (ENTERED ON SCHEDULING LIST)

INMATE INSTRUCTED TO NOTIFY MEDICAL IF BAND-AIDS ARE INSUFFICIENT TO HANDLE
DRAINAGE. INMATE VOICED UNDERSTANDING OF MEDICATION AND INSTRUCTIONS. LEFT
MEDICAL IN STABLE CONDITION.

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SIGNED OFF ON 11/28/11 @ 13:29 BY GWENDOLYN T STOKES, REGISTERED NURSE I
 SIGNED OFF ON 11/29/11 @ 7:13 BY JUDY R RABON, NURSE PRACTITIONER III
 SO NOTED
 SIGNED OFF ON 11/29/11 @ 15:01 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 386 DOCTOR'S CLINIC 11/04/11 10:54 LEE COMP
 S> PT CONTINUES TO C/O CHEST PAIN AND BACK PAIN WITH EATING AND DRINKING.
 O> TEMP=098.0 PULSE= 91 RESP=20 BP=110/ 70 WEIGHT=210 PPD= 0
 PT PRESENTS TO MEDICAL H PYLORI CONTINUES TO BE ELEVATED TX'ED X1, WILL RET
 REAT.
 P> AMOXICILLIN 500MG
 SIG: TAKE TWO TAB PO BID X10 DAYS #28
 SIG:
 START DATE: 11/04/11 TOTAL DAYS: 14
 MD: RABON, JUDY R
 METRONIDAZOLE 500MG TABS
 SIG: TAKE ONE TAB PO BID X14 DAYS #28
 SIG:
 START DATE: 11/04/11 TOTAL DAYS: 14
 MD: RABON, JUDY R
 PINK BISMUTH TABS (PEPTO BISMOL) H PYLORI ONLY
 SIG: TAKE TWO TABS PO QID X14 DAYS #28
 SIG:
 START DATE: 11/04/11 TOTAL DAYS: 14
 MD: RABON, JUDY R
 SIGNED OFF ON 11/04/11 @ 11:01 BY JUDY R RABON, NURSE PRACTITIONER III
 XRAY L KNEE
 SIGNED OFF ON 11/04/11 @ 11:02 BY JUDY R RABON, NURSE PRACTITIONER III
 XRAY REQUISITION COMPLETED AND PLACED IN MEDICAL RECORDS
 FORWARDED TO LPN SCREEN FOR MEDICATION
 SIGNED OFF ON 11/04/11 @ 16:56 BY GWENDOLYN T STOKES, REGISTERED NURSE I
 MARS UPDATED
 SIGNED OFF ON 11/07/11 @ 12:57 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 385 NARRATIVE 11/03/11 13:53 LEE COMP
 INMATE WAS A NO SHOW FOR SICK CALL. INSTITUTION LOCKDOWN,
 SIGNED OFF ON 11/03/11 @ 13:54 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 384 LAB CLINIC 10/20/11 11:39 LEE COMP
 THE FOLLOWING LABS CAME BACK OUT OF THE NORMAL RANGE.... LARRY FLOYD MA
 H PYLORI 1.5H (0.0-0.8)
 CHOLESTEROL 229H
 TRIGLYCERIDES 235H
 LDL 146H
 VLDL 47H
 SIGNED OFF ON 10/20/11 @ 11:40 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I
 TX FOR H. PYLORI IN APRIL 2011
 CONFIRM THAT IM IS ON HEART HEALTHY DIET
 GEMFIBROZIL 600 MG PO Q HS X 180 DAYS
 SIGNED OFF ON 10/20/11 @ 13:35 BY JUDY R RABON, NURSE PRACTITIONER III

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NOTED. MAR UPDATED

SIGNED OFF ON 10/22/11 @ 9:44 BY ERIN COLEMAN, LICENSED PRACTICAL NURSE

** ENCOUNTER: 383 LAB CLINIC 10/18/11 7:36 LEE COMP
LIPID AND H PYLORI DRAWN AND SENT TO THE LAB...LARRY FLOYD MA
SIGNED OFF ON 10/18/11 @ 7:36 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 382 SICK CALL 10/07/11 15:08 LEE COMP
S> INMATE TO MEDICAL WITH C/O ATHLETES FEET, KNEE PAIN AND SWELLING, HEADACHES
, AND LEFT SIDED PAIN. INMATE STATES FEET ITCH BETWEEN TOES AND BURN. INMATE
E STATES LEFT KNEE IS GETTING LARGER. INMATE STATES KNEE IS PAINFUL. INMATE
STATES RIGHT KNEE POPS SOMETIMES. INMATE STATES GETS HEADACHES WHEN GOES IN
THE SUN. INMATE STATES HAS TO GO INSIDE TO STOP HEADACHE. INMATE STATES HA
S PAIN ON LOER LEFT SIDE AT TIMES. INMATE STATES HAS A LOT OF GAS. INMATE S
TATES HAS A BOWEL MOVEMENT EVERY DAY. INMATE ALSO C/O SORE THROAT. INMATE S
TATES THROAT HAS BEEN HURTING WHEN SWALLOWING FOR OVER THREE MONTHS. INMATE
DENIES RUNNY NOSE OR PRODUCTIVE COUGH.

O> TEMP=098.4 PULSE= 85 RESP=18 BP=130/ 70 WEIGHT=220 PPD= 0
INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING
. SKIN WARM AND DRY. COLOR WNL. NO THROAT ERYTHEMA OR EDEMA. NO LYMPHADENOP
ATHY. INMATE HAS APPROXIMATELY PEN POINT SIZED RAISED LESIONS TO REAR OF TO
NGUE. NO DRAINAGE. NO ERYTHEMA. MUCOUS MEMBRANES PINK, MOIST, AND INTACT. I
NMATE HAS APPROXIMATELY GOLF BALL SIZED SOFT RAISED LESION TO LEFT OUTER KN
EE. PARTIAL ROM WITH VERBALIZED DISCOMFORT. ABDOMEN SOFT. NO ABDOMINAL RIGIDI
TY. NO REBOUND TENDERNESS. ACTIVE BOWEL SOUNDS IN ALL QUADRANTS. NO GUARDIN
G. INMATE HAS MOIST FLAKY SKIN BETWEEN TOES ON BOTH FEET.

A> ATHLETE'S FOOT (TINEA PEDIS)

P> 1. SEE S.O. #19.

2. WASH FEET WITH SOAP AND WATER, RINSE WELL AND DRY VERY THOROUGHLY.
INMATE INSTRUCTED.3. APPLY LOTRIMIN CREAM VERY SPARINGLY TO THE AFFECTED AREA
BID X 4 WEEKS.

ISSUED PER PILL ROOM NURSE AND INMATE INSTRUCTED ON USE.

INMATE INSTRUCTED ON GOOD FOOT HYGIENE.

INMATE HAS SEVERAL MEDICATIONS THAT EXPIRED 09/28/11. MEDS PLACED ON F5 SCR
EEN FOR RENEWAL.

EXPLAINED TO INMATE WILL FORWARD TO MD/NP FOR REVIEW AND RECOMMENDATIONS.

INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 10/07/11 @ 15:23 BY WANDA K FULTON, REGISTERED NURSE I
F/U CLINIC

SIGNED OFF ON 10/10/11 @ 15:47 BY RONALD G STEEN, PHYSICIAN II

SCHEDULER NOTIFIED PER SCHEDULING NEEDS LIST.

SIGNED OFF ON 10/11/11 @ 15:42 BY WANDA K FULTON, REGISTERED NURSE I

MARS UPDATED

SIGNED OFF ON 10/11/11 @ 16:09 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 381 NARRATIVE 08/23/11 12:42 LEE COMP
I/M WAS A SHOW FOR SICK CALL
SIGNED OFF ON 08/23/11 @ 12:43 BY GWENDOLYN BELLINGER, UNCLASSIFIED

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- ** ENCOUNTER: 324 FOLLOW-UP SICK CALL 04/13/10 16:29 LEE COMP
SNET A NOTE TO STAFF ASKING FOR SOME SORT OF PAPERWORK FROM AN ATTORNEY IN CAMDEN ABOUT MEDICAL REFERRALS. I INFORMED INMATE THAT I HAVE NOT RECEIVED THIS PAPERWORK AND IT SHOULD HAVE BEEN SENT TO COLUMBIA FOR MEDICAL RECORD INFORMATION. Y. MCDONALD, RN.
SIGNED OFF ON 04/13/10 @ 16:30 BY YVONNE MCDONALD, NURSE ADMINISTRATOR/MGR
- ** ENCOUNTER: 323 NARRATIVE 03/29/10 13:40 LEE COMP
INMATE IS SCHEDULED FOR OPHTHALMOLOGY CLINIC ON 04/28/10 AT 1300.
SIGNED OFF ON 03/29/10 @ 13:40 BY SANATHEA F MCCOY, MEDICAL ASSISTANT TECH I
- ** ENCOUNTER: 322 SICK CALL 03/26/10 5:56 LEE COMP
S> 3-25-10 INMATE TO SMU SICK CALL WITH C/O : WANTING AN X RAY OF HIS KNEES AFTER BEING INVOLVED IN AN EARLIER ALTERCATION WITH THE OFFICERS. INMATE ALSO STATES HIS TONGUE IS STILL NUMB AFTER BEING GASSED IN THE MOUTH DURING HIS ALTERCATION WITH THE OFFICERS. INMATE IS WANTING SOME SORT OF MAGIC MOUTHWASH.
O> TEMP=098.0 PULSE= 72 RESP=20 BP=118/ 68 WEIGHT=178 PPD= 0
NO S/S OF ACUTE DISTRESS. RESPIRATIONS ARE EVEN AND UNLABORED. HEART RRR. BOWEL SOUNDS PRESENT IN ALL 4 QUADRANTS. INMATE'S LEFT AND RIGHT KNEES ARE SWOLLEN. INMATE'S TONGUE HAS A WHITE COATING.
X RAY LEFT AND RIGHT KNEES / WHITE COATING TONGUE/ MAGIC MOUTHWASH RX
INMATE TOLD THAT THIS ENCOUNTER WOULD BE DEFERRED TO THE MD SCREEN FOR REVIEW BY THE PHYSICIAN AND THE NEED FOR FOLLOWUP WOULD BE DETERMINED INCLUDING THE NEED FOR X RAYS OF HIS LEFT AND RIGHT KNEES AND THE NEED FOR MOUTHWASH WOULD ALSO BE DETERMINED. INMATE VERBALIZED UNDERSTANDING OF THE FOLLOWING AND WAS ESCORTED BACK TO HIS CELL BY THE SMU OFFICERS.
M. PRATT LPN
SIGNED OFF ON 03/26/10 @ 6:03 BY MARCUS A PRATT, LICENSED PRACTICAL NURSE
MMM WONT HELP NUMB TONGUE - WILL RESOLVE WITH TIME
X-RAY BOTH KNEES.
SIGNED OFF ON 03/26/10 @ 10:47 BY BENJAMIN F LEWIS JR, PHYSICIAN II
MSG SENT TO XRAY TECH
SIGNED OFF ON 03/29/10 @ 10:14 BY SANDRA T JONES, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 321 OUTSIDE RECOMMENDATI 03/24/10 13:54 LEE COMP
IM RETURNED FROM GI CLINIC
IMP: GASTRIC ULCERS
DUODENAL ULCERS
PLAN: INCREASE PRILOSEC TO 20 MG BID
PRILOSEC 20MG
SIG: (1) ONE CAPSULE BID
SIG:
START DATE: 03/24/10 TOTAL DAYS: 180
MD:STEEN, RONALD G
SIGNED OFF ON 03/24/10 @ 13:55 BY JUDY R RABON, NURSE PRACTITIONER III
NOTED
SIGNED OFF ON 03/25/10 @ 11:06 BY BENJAMIN F LEWIS JR, PHYSICIAN II
SIGNED OFF ON 03/25/10 @ 11:14 BY APRIL H MCDONALD, LICENSED PRACTICAL NURSE

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P> GAVE I/M 300CC ANTACID AND 2-200MG IBUS. INSTRUCTED I/M TO KEEP HEAD ELEVATED FOR 2-3 HOURS AFTER EATING IF HE LIES DOWN, TO HAVE SECURITY NOTIFY MEDICAL IF CONDITION WORSENS AND TO SIGN UP FOR SICK CALL IF NEEDED. I/M VERBALIZED UNDERSTANDING AND LEFT MEDICAL IN NAD, PER SECURITY ESCORT. K. MCCASKILL, LPN
SIGNED OFF ON 04/18/10 @ 17:17 BY KATHY M MCCASKILL, LICENSED PRACTICAL NURSE NOTED
SIGNED OFF ON 04/19/10 @ 11:30 BY BENJAMIN F LEWIS JR, PHYSICIAN II

** ENCOUNTER: 327 TELEPHONE ENCOUNTER 04/18/10 16:34 LEE COMP
OFC ANDERSON CALLED FROM SMU STATING I/M IS C/O CHEST PAINS. INSTRUCTED OFC ANDERSON TO BRING I/M TO MEDICAL. K. MCCASKILL, LPN
SIGNED OFF ON 04/18/10 @ 16:36 BY KATHY M MCCASKILL, LICENSED PRACTICAL NURSE

** ENCOUNTER: 326 X-RAY 04/16/10 10:15 LEE COMP
BILATE. KNEES XRATED.
SIGNED OFF ON 04/16/10 @ 10:15 BY VIRGINIA R COLLINS, TECHNICAL MEDICAL ASSO

** ENCOUNTER: 325 SICK CALL 04/15/10 3:57 LEE COMP

S> 4-14-10 INMATE TO SMU SICK CALL WITH C/O: HAVING PAIN IN HIS LEFT RIBS AND KNEES. INMATE STATES HE WOULD LIKE AN XRAY OF BOTH HIS KNEES AND LEFT SIDE. INMATE STATES HE IS IN ALOT OF PAIN.

O> TEMP=098.2 PULSE= 76 RESP=20 BP=124/ 70 WEIGHT=185 PPD= 0
NO S/S OF ACUTE DISTRESS. RESPIRATIONS ARE EVEN AND UNLABORED. HEART RRR. BOWEL SOUNDS PRESENT IN ALL 4 QUADRANTS. ABDOMEN IS SOFT AND NONTENDER. INMATE HAS SORENESS NOTED TO HIS LEFT SIDE. NO BRUISING NOTED. INMATE HAS CREPITUS NOTED TO BOTH KNEES.

A> MUSCULOSKELETAL DISCOMFORT/ PAIN LEFT SIDE/KNEES/ X RAY REQUEST

P> 1. SEE S.O. #27.

2. ACETAMINOPHEN 325 MG. TABS 2 PO QID X 3 DAYS OR IBUPROFEN 400 MG. TABLETS 2 P.O.TID PRN X 3 DAYS. DOCUMENT MEDS GIVEN IN AMR.
3. IF PALPABLE MUSCLE SPASMS PRESENT, CHLORZOXAZONE 500MG. TABS PO QID X 3 DAYS.

INMATE ISSUED CHLORZOXAZONE 500 MG FOR BACK PAIN/SORENESS TO LEFT SIDE.

4. FOR LOWER BACK DISCOMFORT, USE A ROLLED TOWEL UNDER LOW BACK X 5 DAYS.

5. WILLIAM FLEXION EXERCISE(SCDC FORM 24-146) FOR CHRONIC LOW BACK PAIN.

6. RESTRICT STRENUOUS ACTIVITES OR REST THE INVOLVED AREA.

7. HEAT (BY SHOWER, MOIST COMPRESSES OR HOT WATER SOAKS) TO THE INVOLVED AREA QID X 3 DAYS.

INMATE TOLD THAT THIS ENCOUNTER WOULD BE DEFERRED TO THE MD SCREEN FOR REVIEW BY THE PHYSICIAN AND THE NEED FOR FOLLOWUP WOULD BE DETERMINED INCLUDING THE NEED FOR AN X RAY OF HIS KNEES AND LEFT SIDE. INMATE VERBALIZED UNDERSTANDING OF THE ABOVE AND WAS ESCORTED BACK TO HIS CELL BY THE SMU OFFICERS.

M. PRATT LPN

SIGNED OFF ON 04/15/10 @ 4:13 BY MARCUS A PRATT, LICENSED PRACTICAL NURSE CXR PA/LAT, BOTH KNEES

SIGNED OFF ON 04/15/10 @ 14:30 BY BENJAMIN F LEWIS JR, PHYSICIAN II

X-RAY SLIP MADE OUT AND PLACED ON OFFICE DOOR FOR THE AM. KAREN COOPER RN

SIGNED OFF ON 04/15/10 @ 17:08 BY KAREN C COOPER, UNCLASSIFIED

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- ** ENCOUNTER: 380 NARRATIVE 08/01/11 14:28 LEE COMP
I/M WAS A NO SHOW FOR SICK CALL
SIGNED OFF ON 08/01/11 @ 14:29 BY GWENDOLYN BELLINGER, UNCLASSIFIED
- ** ENCOUNTER: 379 DOCTOR'S CLINIC 06/07/11 11:44 LEE COMP
PT C/O BILAT KNEE PAIN, CHEST PAIN AND L SIDE PAIN. STATES HE DOES NOT KNOW WHY THE PAIN STARTED.
PT KNEES UNREMARKABLE AT THIS TIME, NO EDEMA NOTED, L KNEE HAS A SMALL AMOUNT FLUID FILLED KNOT TO LATERAL SIDE OF THE KNEE, CONTINUE TO MONITOR. PT B REATH SOUNDS CTA, CV RRR.
PLAN: RETURN TO CLINIC PRN FOR C/O KNEE PAIN
GIVE PASS FOR TYLENOL 325 MG 2 TABS PO Q 6 HR PRN FOR PAIN.
SIGNED OFF ON 06/07/11 @ 11:53 BY BARBARA A COOK, NURSE PRACTITIONER III
INMATE ISSUED STARTER PACK BY PILL ROOM NURSE.
SIGNED OFF ON 06/07/11 @ 17:51 BY WANDA K FULTON, REGISTERED NURSE I
- ** ENCOUNTER: 378 SICK CALL 06/03/11 14:10 LEE COMP
S> INMATE TO MEDICAL WITH C/O NEVER GETTING TO SEE A DOCTOR ABOUT XRAY RESULTS AND NEED TO SPEAK WITH DOCTOR ABOUT CONTINUED CHEST PAIN.
O> TEMP=097.8 PULSE=111 RESP=20 BP=130/ 70 WEIGHT=215 PPD= 0
INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING. SKIN WARM AND DRY. COLOR WNL.
> DEFER TO MD/NP.
> EXPLAINED TO INMATE WILL FORWARD TO MD/NP FOR REVIEW AND RECOMMENDATIONS FOR MD/NP APPOINTMENT. INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.
SIGNED OFF ON 06/03/11 @ 14:13 BY WANDA K FULTON, REGISTERED NURSE I
IM NEEDS APPT TO DISCUSS CHEST PAIN, F/U WITH RESULTS OF XRAY
SIGNED OFF ON 06/06/11 @ 9:00 BY BARBARA A COOK, NURSE PRACTITIONER III
APPT PLACED ON SCHEDULING NEEDS LIST.
SIGNED OFF ON 06/06/11 @ 10:14 BY TERI K PETTAWAY, UNCLASSIFIED
- ** ENCOUNTER: 377 NARRATIVE 05/19/11 13:34 LEE COMP
INMATE WAS A NO SHOW FOR SICK CALL.
SIGNED OFF ON 05/19/11 @ 13:34 BY REGINALD SCOTT, MEDICAL ASSISTANT TECH I
- ** ENCOUNTER: 376 DOCTOR'S CLINIC 05/04/11 8:25 LEE COMP
XRAY OF THE LEFT KNEE DONE ON 5/2/11: AP AND LATERAL VIEWS WERE OBTAINED. SOFT TISSUES ARE UNREMARKABLE. MINIMAL NARROWING OF THE MEDIAL COMPARTMENT OF THE KNEE JOINT IS PRESENT WITHOUT OSTEOPHYTE FORMATION. VERY MILD HYPERTRPHIC CHANGES ARE ALSO IDENTIFIED AT THE LOCATION OF THE INSERTION OF QUADRICEPS. IMPRESSION: STABLE APPEARANCE OF THE KNEE WITH FINDINGS AS DESCRIBED ABOVE.
SIGNED OFF ON 05/04/11 @ 8:28 BY BARBARA A COOK, NURSE PRACTITIONER III
- ** ENCOUNTER: 375 X-RAY 05/03/11 10:55 LEE COMP
INMATE WAS A NO SHOW FOR XRAY AT KCI.
SIGNED OFF ON 05/03/11 @ 10:55 BY VIRGINIA R COLLINS, TECHNICAL MEDICAL ASSO
- ENCOUNTER: 374 NARRATIVE 05/02/11 9:47 KIRKLAND COMP

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RADIOLOGY APPT. IS SCHEDULED FOR 5/03/2011 C/O CHRONIC SINUS. DINGLE
SIGNED OFF ON 05/02/11 @ 9:53 BY MARIETTA DINGLE, ADMINISTRATIVE ASSISTANT

** ENCOUNTER: 373 FOLLOW-UP SICK CALL 04/20/11 10:55 LEE COMP
IM TO MEDICAL FOR F/U ENC 372 FOR EDUCATION ON HYPERLIPIDEMIA AND FOR
INITIATION OF H. PYLORI PROTOCOL
IM EDUCATED ON IMPORTANCE OF MED COMPLIANCE (ZOCOR), DIET, AND EXERCISE.
INSTRUCTED TO AVOID SALT, FRIED FOODS, ETC.. ENCOURAGED 30 MINS OF EXERCISE
EACH DAY IN DORM ROOM. TAKE ZOCOR AS ORDERED QHS.
INITIATED H. PYLORI PROTOCOL. IM INSTRUCTED ON H. PYLORI CAUSES AND TREATMENT
PROCESS. INSTRUCTIONS ON MEDS GIVEN. NOTIFY MEDICAL IF ANY STOMACH ISSUES
ARISE OR WORSEN.
METRONIDAZOLE 500MG TABS
SIG: TAKE 1 TABLET BY MOUTH 2 TIMES PER DAY X 14 DAYS
SIG:
START DATE: 04/20/11 TOTAL DAYS: 14
MD: RABON, JUDY R
AMOXICILLIN 500MG
SIG: TAKE 1 TABLET BY MOUTH 2 TIMES A DAY X 14 DAYS
SIG:
START DATE: 04/20/11 TOTAL DAYS: 14
MD: RABON, JUDY R
PINK BISMUTH TABS (PEPTO BISMOL) H PYLORI ONLY
SIG: TAKE 2 TABS BY MOUTH 4 TIMES A DAY X 14 DAYS
SIG:
START DATE: 04/20/11 TOTAL DAYS: 14
MD: RABON, JUDY R
ISSUED W/ ABOVE INSTRUCTIONS. VOICES UNDERSTANDING. LEFT MEDICAL
AMBULATORY IN NAD.
SIGNED OFF ON 04/20/11 @ 11:11 BY VICTORIA E EDWARDS, REGISTERED NURSE I
SIGNED OFF ON 04/21/11 @ 7:03 BY JUDY R RABON, NURSE PRACTITIONER III
MARS UPDATED
SIGNED OFF ON 04/28/11 @ 15:08 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 372 LAB CLINIC 04/18/11 5:50 LEE COMP
THE FOLLOWING LABS CAME BACK OUT OF THE NORMAL RANGE.... LARRY FLOYD MA
H-PYLORI 1.6H
HGB 13.0L
MCV 74.9L
MCH 23.5L
MCHC 31.4L
MPV 12.1H
MICROCYTOSIS 1PLUS
FASTING GLUCOSE 122H
CHOLESTEROL 251H
TRIGLYCERIDES 450H
LDH 90H
URINALYSIS TRACE OF LEUKOCYTES
THYROID PANEL WNL
PSA WNL

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LFTS WNL

SIGNED OFF ON 04/18/11 @ 5:54 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I
NKDA

START H. PYLORI PROTOCOL: FLAGYL, AMOXICILLIN, PEPTO.

EDUCATE ON DIET, EXERCISE, MED COMPLIANCE, DZ PROCESS OF HYPERLIPIDEMIA

ZOCOR 40 MG QHS X 180 DAYS

REPEAT H. PYLORI AND LIPID PANEL IN 6 MONTHS

SIGNED OFF ON 04/18/11 @ 7:27 BY JUDY R RABON, NURSE PRACTITIONER III

MARS UPDATED/RETURNED TO NURSING SCREEN FOR SCHEDULING

SIGNED OFF ON 04/18/11 @ 9:52 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

LABS AND EDUCATION ENTERED ON SCHEDULING SHEET

SIGNED OFF ON 04/18/11 @ 16:27 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 371 LAB CLINIC 04/13/11 8:33 LEE COMP
CBC, CMP, LIPID, LFTS, UA, H-PYLORI, THYROID PANEL, PSA WERE ALL SENT TO TH
E LAB.....LARRY FLOYD MA
SIGNED OFF ON 04/13/11 @ 8:33 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 370 DOCTOR'S CLINIC 04/07/11 10:38 LEE COMP
OPTOMETRY CONSULT DISAPPROVED AS IM DOES NOT MEET CRITERIA
V.A.: 20/30 OD, 20/50 OS.
SIGNED OFF ON 04/07/11 @ 10:38 BY JUDY R RABON, NURSE PRACTITIONER III

ENCOUNTER: 369 DOCTOR'S CLINIC 04/01/11 14:35 LEE COMP
S> SEE ENC#369 FOR PARTICULARS. NO SIGNIFICANT BLEEDING NOTED.
O> TEMP=000.0 PULSE= 0 RESP= 0 BP= 0/ 0 WEIGHT= 0 PPD= 0
CONJUNCTIVA INJECTED OU. NECK SUPPLE. LUNGS CLEAR. CAR RRRW/O M, G, R.
ABD-NO HEPATOMEGALY, NL BS, MILD SUPRAPUBIC TENDERNESS. RECTAL-GOOD TONE
NO EXTERNAL HEMORRHOIDS, PROSTATE IS 2+ FIRM, NONTENDER WITH SMOOTH NON-
NODULA SURFACE.
1) IBS, 2) ULCERS BY HX, 3) BPH, 4) GERD,
P> METOCLOPRAMIDE 10MG
SIG: 1 PO Q HS
SIG:
START DATE: 04/01/11 TOTAL DAYS: 90
MD: STEEN, RONALD G
FLOMAX 0.4MG
SIG: 1 PO Q DAY
SIG:
START DATE: 04/01/11 TOTAL DAYS: 180
MD: STEEN, RONALD G
VISINE A EYEDROPS
SIG: 2 GTTS OU BID, PRN
SIG:
START DATE: 04/01/11 TOTAL DAYS: 180
MD: STEEN, RONALD G
PRILOSEC 20MG (DO NOT PRESCRIBE WITH PLAVIX)
SIG: 1 PO BID,
SIG:
START DATE: 04/01/11 TOTAL DAYS: 180

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MD:STEEN, RONALD G

CBC, CMP, LIVER AND LIPID PANELS, THYROID PANEL, PSA, AMYLASE, LIPASE, H. PYLORI, URINALYSIS. IM TO COLLECT 3 DIFFERNT STOOL SAMPLES TO CHECK FOR OCCULT BLOOD. RTC IN 2 WEEKS, SOONER IF PROBLEMS.

SIGNED OFF ON 04/01/11 @ 15:12 BY RONALD G STEEN, PHYSICIAN II

LABS ENTERED ON SCHEDULING SHEET

ISSUE THREE HEMOCULT STOOL CARDS ENTERED ON SCHEDULING SHEET

F/U IN 2 WKS W/STEEN, MD ENTERED ON SCHEDULING SHEET

FORWARDED TO PHARMACY NURSE FOR MEDICATION SIGN OFF

SIGNED OFF ON 04/01/11 @ 15:19 BY GWENDOLYN T STOKES, REGISTERED NURSE I

SIGNED OFF ON 04/01/11 @ 15:20 BY GWENDOLYN T STOKES, REGISTERED NURSE I

MARS UPDATED

SIGNED OFF ON 04/04/11 @ 10:35 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 368 SICK CALL 03/31/11 11:44 LEE COMP

S> I/M PRESENTED TO MEDICAL COMPLAINING OF PAIN AROUND RIGHT EYE, STATES IT IS FROM INJURY RECEIVED FROM OFFICERS. STILL PASSING BLOOD IN STOOL, DARK RED. DIFFICULTY URINATING, SOMETIMES NOTHING WILL COME OUT. ALSO STILL HAVING DIFFICULTY SWALLOWING AND WITH THROAT HURTING. STOMACH HAS BEGUN BOTHERING HIM AGAIN.

O> TEMP=098.3 PULSE= 95 RESP=18 BP=132/ 74 WEIGHT=207 PPD= 0
47 YEAR OLD BLACK MALE. IN NO ACUTE DISTRESS. BP 132/74, DENIES HTN OR BP MEDS. PERFORMED BP TEACHING. A&O X 3. AMBULATION STEADY. SKIN W/D, COLOR WNL; HYPERPIGMENTATION AROUND RIGHT EYE. RESP EVEN AND NONLABORED. BS X 4. ABD SOFT AND NONTENDER. NO N/V. NO DIAPHORESIS. VISION: BILATERAL 20/30, RIGHT 20/50, LEFT 20/30. STATES EYES GETS BLURRY WHEN READING AND GETS A HEADACHE. SWELLING ON LEFT SIDE OF THROAT. I/M'S VOICE IS HOARSE. HX OF ULCERS, WAS ON PRILOSEC AND RANITIDINE, BUT I/M HAS ALLOWED TO EXPIRE AND QUIT TAKING.

A> DEFER TO MD

PER V.O. RABON, NP:

CBC, CMP, PSA, THYROID PANEL, LFT

SCHEDULE I/M FOR 10-12 AM APPT. WITH RABON, NP TO CONTINUE REVIEW

SIGNED OFF ON 04/01/11 @ 14:34 BY RONALD G STEEN, PHYSICIAN II

INMATE WAS SEEN 04/01/11. SEE ENC. 369.

LABS ARE ENTERED ON SCHEDULING SHEET

FORWARDED TO PHARMACY NURSE FOR MEDICATION SIGN OFF

SIGNED OFF ON 04/01/11 @ 15:21 BY GWENDOLYN T STOKES, REGISTERED NURSE I

ANALYTICAL EYE RECORD COMPLETED ALONG WITH CONSULT, PLACED W/CHART

SIGNED OFF ON 04/01/11 @ 15:28 BY GWENDOLYN T STOKES, REGISTERED NURSE I

MARS UPDATED

SIGNED OFF ON 04/04/11 @ 10:57 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 367 PPD 03/19/11 11:11 LEE COMP

TST 3/11/11 GIVEN LFA

READ 3/14/11 NEG 0-4 MM

SIGNED OFF ON 03/19/11 @ 11:12 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 366 NARRATIVE 03/08/11 10:50 LEE COMP

I/M X-RAY APPT. WAS CANCELLED DUE TO INSTIT. LOCKDOWN, WILL RESCHEDULE FOR

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A LATER DATE. DINGLE

SIGNED OFF ON 03/08/11 @ 10:51 BY MARIETTA DINGLE, ADMINISTRATIVE ASSISTANT

** ENCOUNTER: 365 LAB CLINIC 03/02/11 9:39 LEE COMP
INMATE WAS A NO SHOW FOR LABS..... LARRY FLOYD MA
SIGNED OFF ON 03/02/11 @ 9:39 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 364 DOCTOR'S CLINIC 02/25/11 10:58 LEE COMP
S> C/O SORE THROAT FOR WEEKS DENIES NASAL CONGESTION AND POST NASAL DRIP
STOMACH SORE AND PAINFUL
PAIN IN LEFT KNEE
NEEDS BOTTOM BUNK PASS
O> TEMP=098.6 PULSE= 84 RESP=16 BP=108/ 70 WEIGHT=205 PPD= 0
A/O X 3, NONLABORED BREATHING, LARGE MASS ON LEFT SIDE OF THYROID,
HOARSE VOICE,
A> LEFT KNEE PAIN, THROAT MASS, PAINFUL ABD
P> PHENYLGESIC
SIG: (1-2) TABS PO QID PRN FOR PAIN DISP #60/MONTH
SIG:
START DATE: 02/25/11 TOTAL DAYS: 90
MD: RABON, JUDY R
CBC, CMP, THYROID PANEL
U/S OF NECK (THYROID INCLUDED)
CONSULT INITIATED
SIGNED OFF ON 02/25/11 @ 11:08 BY JUDY R RABON, NURSE PRACTITIONER III
LABS PLACED ON SCHEDULER NOTE PAD. MCRAE-BRUCE R.N.
SIGNED OFF ON 02/25/11 @ 18:35 BY LINDA MCRAE-BRUCE, UNCLASSIFIED
MARS UPDATED
SIGNED OFF ON 03/01/11 @ 13:16 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 363 SICK CALL 02/25/11 10:10 LEE COMP
S> IM STATES " MY THROAT IS KILLING ME AND I AM HAVING PAIN IN MY STOMACH AND KNEES."
O> TEMP=097.8 PULSE= 84 RESP=20 BP=108/ 70 WEIGHT=205 PPD= 0
C/O THROAT HURTING X 2 WKS. STOMACH HURTING X 1 WK. KNEES HAVE BEEN HURTING X 1 YEAR. WEARING KNEE SLEEVES WITHOUT RELIEF. HAS TAKEN ZANTAC FOR ACID RE FLUX. C/O THIS BEING DIFFERENCE. HAS A KNOT IN THE LEFT OUTER UPPER ABD.
THROAT IS SORE AT INTERVALS. THROAT CULTURE DONE MONTHS AGO. RESULT UNKNOWN BY IM. WAS ADVISED TO GARGLE DAILY WITH SALT WATER. NO RELIEF NOTED. HURTS TO SWALLOW. NO RESP DISTRESS NOTED. SKIN W/D. COLOR GOOD. NO ABD. DISTENSION NOTED. THROAT IS RED WITH BUMPSON THE BACK OF THE TONGUE. USING MAGIC MOUTH WASH WITHOUT RELIEF.
A> MUSCULOSKELETAL DISCOMFORT
P> 1. SEE S.O. #27.
2. ACETAMINOPHEN 325 MG. TABS 2 PO QID X 3 DAYS OR IBUPROFEN 400 MG. TABLETS 2 P.O. TID PRN X 3 DAYS. DOCUMENT MEDS GIVEN IN AMR.
3. IF PALPABLE MUSCLE SPASMS PRESENT, CHLORZOXAZONE 500MG. TABS PO QID X 3 DAYS.
4. FOR LOWER BACK DISCOMFORT, USE A ROLLED TOWEL UNDER LOW BACK X 5 DAYS.
5. WILLIAM FLEXION EXERCISE (SCDC FORM 24-146) FOR CHRONIC LOW BACK PAIN.

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6. RESTRICT STRENUOUS ACTIVITIES OR REST THE INVOLVED AREA.
 7. HEAT (BY SHOWER, MOIST COMPRESSES OR HOT WATER SOAKS) TO THE INVOLVED AREA QID X 3 DAYS.
 CHLORZORAZONE 500MG GIVEN FOR PAIN.
 REFERRED TO NP FOR EXAM AND TREATMENT TODAY.
 VOICED UNDERSTANDING. LEFT NAD. MCRAE-BRUCE R.N.
 SIGNED OFF ON 02/25/11 @ 18:32 BY LINDA MCRAE-BRUCE, UNCLASSIFIED

** ENCOUNTER: 362 EMERGENCY INHOUSE 02/14/11 11:26 LEE COMP
 S> INMATE TO MEDICAL WITH C/O HARD TO BREATHE AND THROAT HURTS. INMATE STATES HE AS HAD TROUBLE EATING DUE TO THROAT HURTS. INMATE STATES HIS THROAT SORENESS GOT WORSE ABOUT THREE DAYS AGO. INMATE STATES LIDOCAINE DOES NOT WORK AS LONG AS IT USE TO.
 O> TEMP=098.1 PULSE= 94 RESP=16 BP=120/ 70 WEIGHT=201 PPD= 0
 INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING. SKIN WARM AND DRY. COLOR WNL. LUNGS CLEAR IN ALL LOBES. ERYTHEMA TO LEFT SIDE OF THROAT. NO THROAT EDEMA. INMATE HAS FIVE HARD RAISED ROUND APPROXIMATELY PEA SIZED LESIONS ON REAR OF TONGUE. NO DRAINAGE.
 A> SORE THROAT.
 P> INMATE WAS SEEN ON ENCOUNTER #361 BY MS J. RABON NP. INMATE HAS BEEN ORDERED SINUS FILMS PER ENC#361 AND MEDICATIONS FOR SORE THROAT. DISCUSSED IMPORTANCE OF MEDICATION COMPLIANCE WITH INMATE. INSTRUCTED INMATE THAT ONCE SINUS FILMS ARE COMPLETED HE IS ORDERED TO BE SEEN IN NP CLINIC.
 INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS. SIGNED OFF ON 02/14/11 @ 11:33 BY WANDA K FULTON, REGISTERED NURSE I

** ENCOUNTER: 361 DOCTOR'S CLINIC 01/24/11 11:19 LEE COMP
 S> C/O CHRONIC HEADACHES THAT ARE WORSE OVER THE RIGHT SIDE OF FOREHEAD THROAT IS SORE ALL THE TIME AND CHRONICALLY BLOWS NOSE.
 C/O RIGHT KNEE PAIN AND POPPING (USES KNEE SLEEVE)
 REQUESTS RENEWAL OF NORTRIPTYLENE
 PERCOGESIC HELPS SOME
 O> TEMP=000.0 PULSE= 0 RESP= 0 BP= 0/ 0 WEIGHT= 0 PPD= 0
 A/O X 3, NONLABORED BREATHING, HRRR, +BS, NO HSM, TENDER FACIAL SINUSES TM'S FULL, THROAT RED WITH THICK SINUS DRAINAGE, TURBINATES RED THICK SWOLLEN WITH THICK CLEAR MUCUS
 A> CHRONIC SINUSITIS
 P> TRIAL OF CTM 4 MG STARTER (DRINK LOTS OF LIQUID)
 ZYRTEC 10 MG PO QD X 90 DAYS
 NORTRIPTYLENE 50 MG PO QHS X 90 DAYS
 PERCOGESIC STARTER PACK FOR HEADACHE
 SINUS FILMS
 CONSIDER NASAL SALINE WASH AFTER SINUS FILMS
 2 WEEK F/U APPT AFTER SINUS XRAYS
 MICONAZOLE CREAM FOR ATHELETES FOOT FUNGUS
 SIGNED OFF ON 01/24/11 @ 11:30 BY JUDY R RABON, NURSE PRACTITIONER III
 MARS UPDATED/RETURNED BACK TO NURSING SCREEN
 SIGNED OFF ON 01/24/11 @ 15:24 BY SANDRA T JONES, LICENSED PRACTICAL NURSE
 XRAY REQUISITION COMPLETED AND PLACED IN MEDICAL RECORDS
 F/U ENTERED ON SCHEDULING SHEET

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SIGNED OFF ON 01/24/11 @ 18:38 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 360 LAB CLINIC 01/12/11 6:29 LEE COMP
THROAT CULTURE FOR STREP CAME BACK NEGATIVE....LARRY FLOYD MA
SIGNED OFF ON 01/12/11 @ 6:30 BY CECIL L FLOYD JR, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 359 NARRATIVE 12/31/10 18:00 LEE COMP
PLEASE CHECK ENC. 359 . MEDS ARE TO EXP. LIDOCAINE AND MAGIC MOUTHWASH.
ARE ON THE MED SCREEN. ENC. WAS CLOSED BY MISTAKE.
MAGIC MOUTHWASH
SIG:MIX WITH LIDOCAIN AND USE AS SWISH AND SWALLOW.
SIG:
START DATE: 12/31/10 TOTAL DAYS: 90
MD:RABON,JUDY R
LIDOCAINE VIS SOL 2% ALP
SIG:MIX WITH MAGIC MOUTHWASH AND USE AS SWISH AND SWOL
SIG:LOW.
START DATE: 12/31/10 TOTAL DAYS: 90
MD:RABON,JUDY R
THANKS MCRAE-BRUCE R.N.
SIGNED OFF ON 12/31/10 @ 18:05 BY LINDA MCRAE-BRUCE, UNCLASSIFIED
NOTED
SIGNED OFF ON 01/04/11 @ 10:20 BY BENJAMIN F LEWIS JR, PHYSICIAN II
SO NOTED
SIGNED OFF ON 01/04/11 @ 15:44 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 358 SICK CALL 12/31/10 8:52 LEE COMP
S> IM STATES " I AM HAVING PAIN IN MY GROIN AREA. I HAVE RECTAL BLEEDING. MY
THROAT IS SORE. MY KNEES ARE BOTHERING ME. I AM HAVING PROBLEMS WITH MY STO
MACH. SKIN ON FEET IS RED AND FLAKY. C/O FEET ITCHING. I NEED TO RENEW MY
MOUTHWASH AND LIDOCAINE. THEY ARE ABOUT TO EXPIRE."
O> TEMP=098.0 PULSE= 78 RESP=20 BP=140/ 74 WEIGHT=198 PPD= 0
WAS GIVEN FIBER, ZANTAC AND PRILOSE FOR HIS STOMACH YESTERDAY. STOOL ARE VE
RY HARD. C/O RECTAL BLEEDING AT INTERVALS AFTER BMS. NO C/O EXTERNAL HEMMOR
ROIDS AT PRESENT. BUMPS NOTED TO BACK OF TONGUE. THROAT CULTURE WAS ORDERED
10-08-10 AND HASN'T BEEN DONE. WILL PLACE ON LAB BOOK FOR TUESDAY. 1-3-11.
THROAT CONT. TO BE RED. ABD. IS SOFT. NO DISTENTION NOTED. BOWELL SOUNDS OK
A> ATHLETE'S FOOT (TINEA PEDIS)
HEMMORRIDS
P> 1. SEE S.O. #19.
2. WASH FEET WITH SOAP AND WATER, RINSE WELL AND DRY VERY THOROUGHLY.
3. APPLY LOTRIMIN CREAM VERY SPARINGLY TO THE AFFECTED AREA
BID X 4 WEEKS.
1. SEE S.O. #44.
2. ANUSOL RECTAL SUPPOSITORY INSERTED INTO THE RECTUM AT H.S.
X 7 NIGHTS OR ANUSOL CREAM APPLIED BID X 7 DAYS.
3. PORTABLE SITZ BATH TID
4. COLACE 100MG. BID PO DAILY X 7 DAYS.
ADVISED TO USE CREAM AS DIRECTED AND APPLY CREAM TO FEET. DRY FLAKY SKIN
NOTED TO BOTTOM OF FEET. ENCOURAGED TO TAKE MEDS AS DIRECTED, EAT A BALANCE

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DIET, DRINK PLENTY OF FLUID AND RETURN TO MEDICAL PRN. VOICED UNDERSTANDING
LEFT NAD. MCRAE-BRUCE R.N.
SIGNED OFF ON 12/31/10 @ 17:58 BY LINDA MCRAE-BRUCE, UNCLASSIFIED

** ENCOUNTER: 357 NARRATIVE 12/07/10 15:22 LEE COMP
NO SHOW FOR SCHEDULED SICK CALL PER SECURITY
SIGNED OFF ON 12/07/10 @ 15:23 BY VICTORIA E EDWARDS, REGISTERED NURSE I

** ENCOUNTER: 356 SICK CALL 12/03/10 12:37 LEE COMP
S> INMATE TO MEDICAL WITH C/O 1) CHEST PAINS AND NUMBNESS IN LEFT ARM FOR APPROXIMATELY A MONTH. 2) REQUESTING ORTHOPEDIC CONSULT FOR KNEE PAIN. INMATE STATES WAS HURT BY OFFICER IN MARCH 2010. INMATE STATES HAS A GRIEVANCE AGAINST DEPARTMENT. INMATE STATES DR. MOORE HAS DENIED CONSULT IN PAST. INMATE STATES "MY LAWYER IS GOING TO MAKE SURE I GET MY CONSULT THIS TIME SINCE I HAVE MY GRIEVANCE FILED." 3) HEADACHE THAT HAPPENS IN THE AFTERNOON. INMATE STATES FOREHEAD HURTS BEHIND EYES. INMATE DENIES RADIATING PAIN. 4) INMATE REQUESTS TONSILS BE REMOVED DUE TO UNRELIEVED THROAT PAIN. INMATE STATES HAS BEEN TREATED FOR SPOTS ON HIS THROAT IN THE PAST COUPLE OF MONTHS. INMATE STATES IS USING MOUTH WASH, BUT THROAT STILL HURTS.

O> TEMP=098.2 PULSE=83 RESP=20 BP=108/80 WEIGHT=184 PPD=0
46 YEAR OLD BM. INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&O X3. NO DIFFICULTIES AMBULATING. SKIN WARM AND DRY. COLOR WNL. FULL LEG AND KNEE ROM. NO KNEE EDEMA BILATERALLY. NO THROAT EDEMA OR ERYTHEMA. INMATE HAS SEVERAL ROUND RAISED LESIONS APPROXIMATELY PEN POINT SIZED TO REAR OF TONGUE. MUCOUS MEMBRANES PINK AND MOIST.

A> TENSION HEADACHE.
MUSCULOSKELETAL DISCOMFORT

- P> 1. SEE S.O. #1.
2. PERCOGESIC TABLETS 2 QID X 2 DAYS.
PILL ROOM NURSE ISSUED STARTER PACK.
3. IF THE FOUR KEY SIGNS OF PAIN ARE PRESENT, CONSULT THE M.D.
1. SEE S.O. #27.
2. ACETAMINOPHEN 325 MG. TABS 2 PO QID X 3 DAYS OR IBUPROFEN 400 MG. TABLETS 2 P.O. TID PRN X 3 DAYS. DOCUMENT MEDS GIVEN IN AMR.
PILL ROOM NURSE ISSUED STARTER PACK OF IBUPROFEN.
3. IF PALPABLE MUSCLE SPASMS PRESENT, CHLORZOXAZONE 500MG. TABS PO QID X 3 DAYS.
4. FOR LOWER BACK DISCOMFORT, USE A ROLLED TOWEL UNDER LOW BACK X 5 DAYS.
5. WILLIAM FLEXION EXERCISE (SCDC FORM 24-146) FOR CHRONIC LOW BACK PAIN.
6. RESTRICT STRENUOUS ACTIVITIES OR REST THE INVOLVED AREA.
7. HEAT (BY SHOWER, MOIST COMPRESSES OR HOT WATER SOAKS) TO THE INVOLVED AREA QID X 3 DAYS.

REVIEWED ENCOUNTERS AND FOUND ORDER FOR THROAT CULTURE ON ENC#353. LAB TECH NOTIFIED PER SCHEDULING NEEDS LIST FOR RESULTS.

EXPLAINED TO INMATE WILL FORWARD TO MD/NP FOR REVIEW AND RECOMMENDATIONS FOR ORTHO CONSULT AND CONTINUING THROAT PAIN. INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.

SIGNED OFF ON 12/03/10 @ 12:55 BY WANDA K FULTON, REGISTERED NURSE I
SEE IN MD/NP CLINIC

SIGNED OFF ON 12/09/10 @ 12:59 BY BENJAMIN F LEWIS JR, PHYSICIAN II

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ENTERED APPT. REQUEST ON SCHEDULING SHEET

SIGNED OFF ON 12/09/10 @ 18:12 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 355 FOLLOW-UP SICK CALL 10/22/10 14:21 LEE COMP
 S> INMATE TO MEDICAL WITH C/O THROAT STILL HURTING AND MOUTH WASH ONLY WORKS FOR A SHORT PERIOD OF TIME. INMATE STATES HE NEEDS SOMETHING ELSE TO HELP RELIEVE THE THROAT PAIN. INMATE STATES "MY THROAT HAS BEEN MESSED UP EVER SINCE THE POLICE GASSED ME." INMATE STATES HAS HAD MOUTH ULCERS IN THE PAST.
 O> TEMP=098.3 PULSE= 98 RESP=20 BP=128/ 60 WEIGHT=194 PPD= 0
 INMATE IN NO ACUTE DISTRESS. VITALS WNL. A&OX3. NO DIFFICULTIES AMBULATING. SKIN WARM AND DRY. COLOR WNL. SKIN TURGOR <3 SECONDS. NO LYMPHADENOPATHY. THROAT ERYTHEMA AND EDEMA. MUCOUS MEMBRANES INTACT.
 A> DEFER TO NP.
 P> AMOXICILLIN 500MG
 SIG: ONE CAPSULE BY MOUTH BID X 10 DAYS.
 SIG:
 START DATE: 10/22/10 TOTAL DAYS: 7
 MD: RABON, JUDY R
 VO PER MS RABON NP: AMOXICILLIN 500MG BID X10 DAYS, PREDNISONE BOOSTER PACK, AND RECHECK IN 2 WEEKS.
 AMOXICILLIN STARTER PACK ISSUED. PREDNISONE ISSUED. SCHEDULER NOTIFIED PER SCHEDULING NEEDS LIST.
 INMATE VERBALIZED UNDERSTANDING. INMATE LEFT MEDICAL IN NO ACUTE DISTRESS.
 SIGNED OFF ON 10/22/10 @ 14:29 BY WANDA K FULTON, REGISTERED NURSE I
 SIGNED OFF ON 10/25/10 @ 9:27 BY JUDY R RABON, NURSE PRACTITIONER III
 SIGNED OFF ON 10/25/10 @ 15:57 BY GWENDOLYN T STOKES, REGISTERED NURSE I

** ENCOUNTER: 354 DENTAL CLINIC 10/22/10 7:46 LEE COMP
 TEETH CLEANED AND CHECKED, OHT BY DR. UBAH, SEE HARD COPY
 SIGNED OFF ON 10/22/10 @ 7:47 BY DEBORAH L MCCLARY, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 353 DOCTOR'S CLINIC 10/08/10 11:22 LEE COMP
 S> C/O SORE THROAT AND ACID REFLUX
 O> TEMP=098.0 PULSE= 98 RESP=18 BP=130/ 72 WEIGHT=185 PPD= 0
 A/O X 3, NONLABORED BREATHING, THROAT SLIGHTLY RED
 A> PHARYNGITIS, GERD
 P> LIDOCAINE VIS SOL 2% ALP
 SIG: MIX IN MAGIC MOUTH WASH FOR SWISH & SWALLOW
 SIG:
 START DATE: 10/08/10 TOTAL DAYS: 90
 MD: RABON, JUDY R
 MAGIC MOUTHWASH
 SIG: MIX WITH VISCOUS LIDOCAINE
 SIG:
 START DATE: 10/08/10 TOTAL DAYS: 90
 MD: RABON, JUDY R
 PRILOSEC 20MG
 SIG: (1) ONE CAP PO BID
 SIG:
 START DATE: 10/08/10 TOTAL DAYS: 180

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MD:RABON, JUDY R

RANITIDINE

150MG

SIG: (1) ONE TAB TID 30 MINUTES BEFORE MEALS

SIG:

START DATE: 10/08/10 TOTAL DAYS: 365

MD:RABON, JUDY R

BOTTOM BUNK BOTTOM TIER

HEALTH SUMMARY CHANGED

THROAT CULTURE FOR CHRONIC PHARYNGITIS

SIGNED OFF ON 10/08/10 @ 11:28 BY JUDY R RABON, NURSE PRACTITIONER III

MARS UPDATED/RETURNED TO NURSING SCREEN FOR SCHEDULING

SIGNED OFF ON 10/08/10 @ 13:27 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

LAB PLACED ON SCHEDULING LIST.

SIGNED OFF ON 10/08/10 @ 14:48 BY KATHY M MCCASKILL, LICENSED PRACTICAL NURSE

** ENCOUNTER: 352 NARRATIVE 10/01/10 15:03 LEE COMP
I/M NO SHOW FOR SICK CALL DUE TO SECURITY ISSUE
SIGNED OFF ON 10/01/10 @ 15:05 BY GWENDOLYN BELLINGER, UNCLASSIFIED

** ENCOUNTER: 351 SICK CALL 09/24/10 7:34 LEE COMP
S> INMATE TO ASU SICK CALL AND STATES "MY THROAT STILL HURTS AND THE MOUTH WAS
H MADE MY ULCERS FLARE UP"
INMATE ALSO REQUESTING PAIN MEDICATION FOR KNEE PAIN.
INMATE ORTHO CONSULT DISAPPROVED SEE ENC.345.
O> TEMP=98.7 PULSE=126 RESP=20 BP=120/ 80 WEIGHT=200 PPD= 0
BM.ALERT AND ORIENTED X3. INMATE HAS DIFFICULTY BENDING KNEE. SOME SWELLING N
OTED TO BILAT KNEES. TWO BUMPS NOTED TO THE BACK PORTION OF INMATES TONGUE.
NO DRAINAGE, REDNESS NOTED AND RAISED. ABD SOFT. BS X 4 QUADS.
A> DEFER TO MD
P> DEFER TO MD ON PAIN MEDICATION AND UNRESOLVED MOUTH ULCERS
SIGNED OFF ON 09/24/10 @ 7:43 BY SHEREESE S FRANKLIN, UNCLASSIFIED
NONFORMULARY INITIATED FOR LYSINE 1000 MG BID X 90 DAYS
SCHEDULE FOR NP CLINIC FOR EVALUATION OF KNEE PAIN
SIGNED OFF ON 09/30/10 @ 10:00 BY JUDY R RABON, NURSE PRACTITIONER III
SCHEDULER NOTIFIED PER SCHEDULING NEEDS LIST.
SIGNED OFF ON 10/01/10 @ 13:57 BY WANDA K FULTON, REGISTERED NURSE I

** ENCOUNTER: 350 OUTSIDE RECOMMENDATI 09/08/10 18:06 LEE COMP
INMATE RETURNED TO LEE CI FROM OPHTHOMOLOGY CLINIC.
OUTSIDE RECOMMENDATIONS FROM OPHTHOMOLOGY CLINIC ARE AS FOLLOWS:
NORMAL EXAM, RETURN PRN.DR.KOCHER
SIGNED OFF ON 09/08/10 @ 18:09 BY WANDA K FULTON, UNCLASSIFIED
SIGNED OFF ON 09/13/10 @ 14:47 BY RICHARD C BEARDEN JR, PHYSICIAN II

** ENCOUNTER: 349 OUTSIDE APPOINTMENT 09/08/10 10:40 LEE COMP
PAYMENT AUTH FOR KCI-OPHTHALMOLOGY FOR 09/08/10 FOR APPT
BY ANDREA STRACHAN MEDICAL ASSISTANT TECH
SIGNED OFF ON 09/03/10 @ 10:41 BY ANDREA F STRACHAN, UNCLASSIFIED

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** ENCOUNTER: 348 DOCTOR'S CLINIC 08/30/10 12:52 LEE COMP

S> C/O SORE THROAT

O> TEMP=097.9 PULSE= 72 RESP=20 BP=134/ 79 WEIGHT= 0 PPD= 0
A/O X3, NONLABORED BREATHING, SKIN W/D, COLOR WNL, THROAT BEEFY RED WITH
EXUDATE, SWOLLEN CERVICAL LYMPH NODES

P> AUGMENTIN 875MG

SIG: (1) ONE TAB BID

SIG:

START DATE: 08/30/10 TOTAL DAYS: 10

MD: RABON, JUDY R

MAGIC MOUTHWASH

SIG: ADD LIDOCAINE AND SWISH/SWALLOW QID

SIG:

START DATE: 08/30/10 TOTAL DAYS: 30

MD: RABON, JUDY R

LIDOCAINE VIS SOL 2% ALP

SIG: ADD TO MAGIC MOUTH WASH & SWISH & SWALLOW

SIG:

START DATE: 08/30/10 TOTAL DAYS: 30

MD: RABON, JUDY R

SIGNED OFF ON 08/30/10 @ 12:56 BY JUDY R RABON, NURSE PRACTITIONER III

THERE IS NO AMT TO MIX LIDOCAINE/WITH MOUTHWASH HOW MANY TIME DAILY

SIGNED OFF ON 08/30/10 @ 15:44 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

DISCARD THE VOLUME AMOUNT OF VISCOUS FROM THE MOUTHWASH, THEN ADD THE

LIDOCAINE INTO MOUTHWASH BOTTLE & SHAKE WELL. IM TO TAKE 1 TABLESPOON

BID TO SWISH & SWALLOW X 30 DAYS

SIGNED OFF ON 09/01/10 @ 7:59 BY JUDY R RABON, NURSE PRACTITIONER III

MEDS NOTED BY PHARMACY DIRECT MARS UPDATED

SIGNED OFF ON 09/01/10 @ 14:00 BY SHERI L SCOTT, LICENSED PRACTICAL NURSE

** ENCOUNTER: 347 FOLLOW-UP SICK CALL 08/28/10 0:22 LEE COMP

S> 8-27-10 INMATE IN ASU SICKCALL C/O HAVING SORE THROAT ABOUT A WEEK AND A
HALF. INMATE STATES THAT HE CAN TASTE SPITTING UP SOME BLOOD. INMATE ALSO
STATES THAT HE HAS DRY SKIN ON BOTH HANDS AND FEET.O> TEMP=098.2 PULSE= 90 RESP=20 BP=122/ 80 WEIGHT=182 PPD= 0
BM. A/OX3. NAD NOTED. HRRR. LUNGS CTA. INMATE WITH HOARSENESS TO HIS VOICE
TONE. INSPECTION OF THROAT WITH REDNESS AND WHITE SPOTS PUS POCKET TO
BILATERAL MOUTH AREAS. NO DRAINAGE NOTED AT THIS TIME, THOUGH SLIGHTLY
SWOLLEN. INMATE WITH BILATERAL DRY SKIN FLAKY TO BOTH FEET/HAND AREAS.
PRIOR REASON FOR S/C SIGN UP WAS PAINFUL KNEES/FEET. INMATE INFORMED THAT
CONSULT FOR ORTHO WAS INITIATED AND INMATE IS TAKING CURRENTLY TAKING
NAPROXEN 500MG AS ORDERED PER INMATE.

A> SORETHROAT/ SPITTING UP BLOOD/ DRY SKIN

P> INMATE INFORMED THAT THIS ENC WILL BE FORWARDED TO THE MD SCREEN FOR REVIEW
INMATE VERBALIZE ALL UNDERSTANDING OF DIRECTIVES GIVEN.

SIGNED OFF ON 08/28/10 @ :32 BY MARTHA BOYD, LICENSED PRACTICAL NURSE

MD APPT SCHEDULED

SIGNED OFF ON 08/30/10 @ 12:52 BY JUDY R RABON, NURSE PRACTITIONER III

ENCOUNTER: 346 OUTSIDE RECOMMENDATI 08/26/10 16:30 LEE

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INMATE RETURNED FROM KCI OPHTHAMOLOGY.

KCI OPHTHAMOLOGY HAD THE FOLLOWING RECOMMENDATIONS:

S/P TRAUMA OS

REFER TO DR. RANDOLPH FOR GLASSES.

SIGNED OFF ON 08/26/10 @ 16:33 BY WANDA K. FULTON, UNCLASSIFIED

INITIATE AN ANALYTICAL EYE EXAM AFTER VISUAL ACUITY

SIGNED OFF ON 08/27/10 @ 10:46 BY JUDY R. RABON, NURSE PRACTITIONER III
MSG SENT TO CLINIC NURSE

SIGNED OFF ON 08/27/10 @ 15:51 BY SANDRA T. JONES, LICENSED PRACTICAL NURSE

- ** ENCOUNTER: 345 DOCTOR'S CLINIC 08/23/10 16:10 LEE COMP
ORTHO APPT DISAPPROVED PER DR. MOORE
COPIES OF X-RAYS SENT WITH CONSULT REQUEST
SIGNED OFF ON 08/23/10 @ 16:24 BY JUDY R. RABON, NURSE PRACTITIONER III
- ** ENCOUNTER: 344 OUTSIDE APPOINTMENT 08/25/10 11:15 LEE COMP
BILLING AUTH FOR KCI OPHTHAMOLOGY CLINIC FOR 08/25/10.
SIGNED OFF ON 08/19/10 @ 11:16 BY DEANA C. OUTLAW, ADMINISTRATIVE ASSISTANT
- ** ENCOUNTER: 343 DOCTOR'S CLINIC 08/17/10 9:50 LEE COMP
IM MAY HAVE NAPROXEN 500 MG BID FOR BILATERAL KNEE PAIN
NAPROXEN 500MG
SIG: (1) ONE TAB BID
SIG:
START DATE: 08/17/10 TOTAL DAYS: 30
MD: RABON, JUDY R
NEW ORTHO CONSULT INITIATED
SIGNED OFF ON 08/17/10 @ 9:52 BY JUDY R. RABON, NURSE PRACTITIONER III
MARS UPDATED
SIGNED OFF ON 08/17/10 @ 14:13 BY SANDRA T. JONES, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 342 DOCTOR'S CLINIC 08/13/10 13:32 LEE COMP
ORTHO CONSULT DISAPPROVED PER DR. MOORE
SIGNED OFF ON 08/13/10 @ 13:33 BY JUDY R. RABON, NURSE PRACTITIONER III
- ** ENCOUNTER: 341 OUTSIDE RECOMMENDATI 08/13/10 13:25 LEE COMP
SCHEDULER NOTIFIED TO RESCHEDULE OPHTHALMOLOGY APPOINTMENT FOR AUGUST 25, 2010 DUE TO INMATE ARRIVED ON AUGUST 11, 2010 AFTER CLINIC HAD ENDED.
SIGNED OFF ON 08/13/10 @ 13:27 BY WANDA K. FULTON, UNCLASSIFIED
- ** ENCOUNTER: 340 OUTSIDE RECOMMENDATI 08/11/10 16:51 LEE COMP
INMATE CHART TO AND FROM OPHTHAMOLOGY CLINIC AND HIS CONSULT IS BLANK. WILL DETERMINE IF HE WAS SEEN. KAREN COOPER RN
SIGNED OFF ON 08/11/10 @ 16:51 BY KAREN C. COOPER, UNCLASSIFIED
- ** ENCOUNTER: 339 OUTSIDE APPOINTMENT 08/11/10 11:32 LEE COMP
BILLING AUTH FOR OPHTHAMOLOGY CLINIC APPT 08/11/10.
SIGNED OFF ON 08/06/10 @ 11:32 BY DEANA C. OUTLAW, ADMINISTRATIVE ASSISTANT
- ** ENCOUNTER: 338 DOCTOR'S CLINIC 08/02/10 7:55 LEE COMP

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MSG SENT TO CLINIC NURSE

SIGNED OFF ON 05/04/10 @ 9:28 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 331 MENTAL HEALTH CLINIC 04/29/10 10:45 LEE COMP
CCC NOTE: 30-DAY LOCK UP EVAL

D: I/M CAME TO DOOR AS CALLED. WAS A&O IN ALL SPHERES W/GOOD EYE CONTACT. HIS HYGIENE CARE & CELL CONDITION WAS GOOD. HIS MOOD/AFFECT WAS CALM AND RESPONSIVE. HE DENIED MH PROBLEMS OR CONCERNS. "BUT LOOK AT MY KNEES...THIS WAS CAUSED BY ALTERCATION W/THE OFFICERS...". I/M STATED HE HAS BEEN SEEN BY MEDICAL BUT NOTHING HAS BEEN DONE YET. CCC ENCOURAGED I/M TO WRITE MEDICAL AGAIN & SIGN UP FOR SICK CALL SO THEY CAN PROVIDE F/U/ANSWERS TO HIS CONCERNS. I/M VOICED UNDERSTANDING. HE DENIED SKS OF PSYCHOSIS OR H/S THOUGHTS/PLANS. REPORTED SLEEP /APPETITE AS WNL. I/M'S SPEECH WAS LOGICAL & THOUGHTS WELL PRESENTED. WAS POLITE & COOPERATIVE.

A: I/M APPEARS STABLE.

P: EVALS TO CONTINUE. SHOULD I/M REMAIN IN SMU.

**WILL FLAG FOR NURSING TO F/U WITH I/M'S MEDICAL CONCERNS. G. BREON, CCC III

SIGNED OFF ON 04/29/10 @ 10:48 BY SUSAN V BREON, HUMAN SERVICES COORD I

I/M'S KNEES HAVE BEEN X-RAYED. REPORT SHOWED LITTLE TO NO CHANGES SINCE X-RAYS TAKEN IN 2008. ALLEGED ALTERCATION WAS IN 3/2010-ENC 312.

SIGNED OFF ON 04/30/10 @ 17:04 BY KATHY M MCCASKILL, LICENSED PRACTICAL NURSE

** ENCOUNTER: 330 OUTSIDE RECOMMENDATI 04/28/10 16:21 LEE COMP
INMATE TO OPHTHAMALOGY CLINIC WITH THE FOLLOWING RECOMMENDATIONS:

HX OF TRAUMA NO ORBITAL INJURY

FOLLOW UP IN 3 MONTHS AT OPHTHAMALOGY

PER DR. KOCHER. KAREN COOPER RN

SIGNED OFF ON 04/28/10 @ 16:25 BY KAREN C COOPER, UNCLASSIFIED

CONSULT INITIATED

SIGNED OFF ON 04/29/10 @ 11:24 BY JUDY R RABON, NURSE PRACTITIONER III

** ENCOUNTER: 329 X-RAY 04/22/10 13:01 LEE COMP

RECEIVED REPORTS ON BILAT KNEES. LEFT KNEE- PRODUCTIVE CHANGE AT QUADRICEPS INSERTION WITH QUESTION OF MINIMAL NARROWING OF THE MEDIAL JOINT SPACE OF THE LEFT KNEE, OTHERWISE WITH NORMAL AND UNCHANGED APPEARANCE OF THE LEFT KNEE WHEN COMPARED WITH APRIL 2008. RIGHT KNEE- QUESTION OF MINIMAL NARROWING IN THE MEDIAL JOINT SPACE WITH OTHERWISE NORMAL TWO VIEWS RIGHT KNEE.

SIGNED OFF ON 04/22/10 @ 13:03 BY VIRGINIA R COLLINS, TECHNICAL MEDICAL ASSO

SIGNED OFF ON 04/26/10 @ 8:15 BY JUDY R RABON, NURSE PRACTITIONER III

** ENCOUNTER: 328 EMERGENCY INHOUSE 04/18/10 17:06 LEE COMP

S> I/M ESCORTED BY OFC MCBRIDE FROM SMU TO MEDICAL WITH C/O CHEST PAIN. I/M POINTS TO AREA ON OUTER SIDE OF L BREAST AS SITE OF PAIN.

O> TEMP=098.1 PULSE= 72 RESP=16 BP=120/ 80 WEIGHT= 0 PPD= 0

02 SAT 98% RA. NO SOB, NO DIAPHORESIS NOTED. HEART RRR, LUNGS CTA. PAIN REPRODUCIBLE WHEN PALPATED. I/M STATES HE ATE MEAT LOAF FOR DINNER AND THEN LAID DOWN. HAS HX OF GASTRIC AND DUODENAL ULCERS-SEE ENC 321.

? REFLUX.

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WRITTEN REQUEST FOR MD APPT FOR DIFFICULTY SWALLOWING AFTER BEING GASSED BY SECURITY.

SECOND REQUEST FOR BUMPING KNEE IN SHOWER, NOW WITH PAIN, SWELLING ORTHO APPT ALREADY MADE, XRAYS DONE.

MAKE SICK CALL APPT FOR SWALLOWING (?) PROBLEMS

SIGNED OFF ON 08/02/10 @ 7:57 BY JUDY R RABON, NURSE PRACTITIONER III
SO NOTED/MSG SENT TO CLINIC NURSE

SIGNED OFF ON 08/02/10 @ 12:43 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 337 DOCTOR'S CLINIC 07/26/10 13:29 LEE COMP
WRITTEN STAFF REQUEST FORM FOR BILATERAL KNEE PAIN AND BLURRED VISION
PLEASE CONFIRM F/U APPT WITH OPHTHALMOLOGY FROM 4/28/10
INITIATE ORTHO CONSULT FOR BILATERAL KNEE PAIN/CREPITUS
SEND COPY OF XRAYS & REPORT TO CLINIC
SIGNED OFF ON 07/26/10 @ 13:32 BY JUDY R RABON, NURSE PRACTITIONER III
ORTHO CONSULT INITIATED. MEDICAL RECORDS NOTIFIED TO SEND COPY OF XRAY AND REPORT TO CLINIC.
OPHTHAMMOLOGY CONSULT INITIATED. D. JOHNSON RN
SIGNED OFF ON 07/26/10 @ 15:36 BY DELORES T JOHNSON, REGISTERED NURSE I

** ENCOUNTER: 336 SICK CALL 07/08/10 6:21 LEE COMP
S> 7-7-10 INMATE TO SMU SICK CALL WITH C/O : HAVING PAIN (CREPITUS) IN BOTH HIS LEFT AND RIGHT KNEES. INMATE INQUIRING ABOUT THE ORTHOPEDIC CLINIC AND WHEN HE MIGHT GET TO GO ??? INMATE CURRENTLY ON NORTRIPTYLINE FOR KNEE PAIN. INMATE ALSO WITH C/O HAVING ATHLETE'S FEET.
O> TEMP=098.4 PULSE=72 RESP=18 BP=126/70 WEIGHT=180 PPD=0
NO S/S OF ACUTE DISTRESS. RESPIRATIONS ARE EVEN AND UNLABORED. HEART RRR. BOWEL SOUNDS PRESENT IN ALL 4 QUADRANTS. ABDOMEN IS SOFT AND NONTENDER. INMATE HAS CREPITUS IN BOTH KNEES AND CANT BEND PARALLEL TO THE FLOOR. INMATE HAS CRACKING NOTED IN BETWEEN HIS TOES AND ON HIS HEELS.
A> ATHLETE'S FOOT (TINEA PEDIS)/ CREPITUS BOTH KNEES/ ORTHOPEDIC CLINIC ?
P> 1. SEE S.O. #19.
2. WASH FEET WITH SOAP AND WATER, RINSE WELL AND DRY VERY THOROUGHLY.
3. APPLY LOTRIMIN CREAM VERY SPARINGLY TO THE AFFECTED AREA
BID X 4 WEEKS.

INMATE ISSUED MICONAZOLE CREAM FOR HIS ATHLETE'S FOOT FUNGUS. INMATE TOLD THAT THIS ENCOUNTER WOULD BE DEFERRED TO THE MD SCREEN FOR REVIEW BY THE PHYSICIAN AND THE NEED FOR FOLLOWUP WOULD BE DETERMINED INCLUDING THE NEED FOR AN ORTHOPEDIC APPOINTMENT. INMATE VERBALIZED UNDERSTANDING OF THE ABOVE AND WAS ESCORTED BACK TO HIS CELL BY THE SMU OFFICERS.

M. PRATT LPN

SIGNED OFF ON 07/08/10 @ 6:34 BY MARCUS A PRATT, LICENSED PRACTICAL NURSE

P: 1. SCHEDULE TO SEE M.D..

SIGNED OFF ON 07/08/10 @ 8:31 BY RICHARD C BEARDEN JR, PHYSICIAN II
SCHEDULER NOTIFIED. D. JOHNSON RN

SIGNED OFF ON 07/08/10 @ 8:41 BY DELORES T JOHNSON, REGISTERED NURSE I

** ENCOUNTER: 335 DOCTOR'S CLINIC 06/17/10 15:07 LEE COMP
S> C/O PAIN IN BOTH KNEES
KNEES SOMETIMES LOCKS UP AND CAN'T WALK

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UNABLE TO TAKE MOTRIN OR TYLENOL AS IM STATES HE HAS GASTRIC ULCERS
O> TEMP=099.5 PULSE= 74 RESP=18 BP=134/ 72 WEIGHT=180 PPD= 0
A/O X 3, NONLABORED BREATHING, SKIN W/D, COLOR WNL,
BILATERAL GRINDING OF KNEES WITH FORWARD LIFT, LIMITED ROM, GUARDED GAIT
A> BILATERAL KNEE PAIN
NORTRIPTYLENE 50 MG Q HS X 90 DAYS
SIGNED OFF ON 06/17/10 @ 15:10 BY JUDY R RABON, NURSE PRACTITIONER III
MARS UPDATED
SIGNED OFF ON 06/21/10 @ 15:49 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 334 SICK CALL 05/05/10 1:23 LEE COMP

S> INMATE TO SICK CALL AND STATES "MY KNEE HURTS AND AT NIGHT IT REALLY HURTS A
LSO COLD AIR MAKES IT WORST."

INMATE REPORTS ATHLETES FEET .INMATE REPORTS ITCHING AND BURNING SENSATION
TO FEET.

O> TEMP=098.6 PULSE= 68 RESP=20 BP=118/ 80 WEIGHT=178 PPD= 0
BM.ALERT AND ORIENTED X3.SKIN WARM AND DRY TO TOUCH.QUARTER SIZE FLUID FILL
ED NODULE NOTED TO LEFT KNEE.INMATE REPORTS THAT HE HAS STOMACH ULCERS AND
WAS GIVEN NAPROXEN BEFORE AND IT CAUSE BLEEDING AND STOMACH PAIN.FEET CRACK
ING AND PEELING.BOWEL SOUNDS HYPOACTIVE AND INMATE REPORTS SOME CONSTIPATIO
N AND REQUESTING NAT.VEG POWDER.

A> ATHLETE'S FOOT (TINEA PEDIS)

P> 1. SEE S.O. #19.

2. WASH FEET WITH SOAP AND WATER, RINSE WELL AND DRY VERY THOROUGHLY.

3. APPLY LOTRIMIN CREAM VERY SPARINGLY TO THE AFFECTED AREA

BID X 4 WEEKS.

MICONAZOLE CREAM ISSUED FROM STOCK.

DEFER TO MD ABOUT KNEE PAIN PLEASE SEE ENC 329 ON 4-22-10

DEFER TO MD ABOUT NEED FOR NAT.VEG POWDER.

SIGNED OFF ON 05/05/10 @ 1:37 BY SHEREESE S FRANKLIN, UNCLASSIFIED

MTMCL RXED

SEE IN MD CLINIC RE KNEE.

SIGNED OFF ON 05/05/10 @ 13:01 BY BENJAMIN F LEWIS JR, PHYSICIAN II

MSG SENT TO CLINIC NURSE

SIGNED OFF ON 05/05/10 @ 13:08 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 333 NARRATIVE 05/04/10 8:26 LEE COMP

IM WRITTEN REQUEST TO KNOW THE NAME AND ADDRESS OF THE PRIMARY CARE
PROVIDER FOR LCI

MY RESPONSE WAS J. RABON, NP IS THE PRIMARY HEALTH PROVIDED FOR LCI
AND MY ADDRESS IS THE SAME AS HIS 990 WISACKY RD BISHOPVILLE.

SIGNED OFF ON 05/04/10 @ 8:28 BY JUDY R RABON, NURSE PRACTITIONER III
SO NOTED

SIGNED OFF ON 05/04/10 @ 9:28 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 332 NARRATIVE 05/04/10 8:26 LEE COMP

WRITTEN REQUEST FOR NP CLINIC FOR KNEE PAIN

IM SEEN ON SICK CALL, XRAYs ORDERED

SCHEDULE FOR NP CLINIC AFTER XRAYs / RESULTS AVAILABLE

SIGNED OFF ON 05/04/10 @ 8:26 BY JUDY R RABON, NURSE PRACTITIONER III

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- ** ENCOUNTER: 320 NARRATIVE 03/24/10 3:52 LEE COMP
3-23-10 22:00 INMATE SIGNED FORM STATING THAT HE UNDERSTANDS HE IS TO BE
NPO AFTER MIDNIGHT ON 3-24-10 FOR HIS ENDOSCOPY PROCEDURE. INMATE SIGNATURE
WAS WITNESSED BY M. PRATT LPN AND C. DENNY LPN
SIGNED OFF ON 03/24/10 @ 3:58 BY MARCUS A PRATT, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 319 X-RAY 03/23/10 8:51 LEE COMP
RECEIVED REPORT ON CT SCAN OF THE HEAD WITHOUT AND WITH INTRAVENOUS CONTRAS
T. IMPRESSION- NO INTRACRANIAL HEMORRHAGE OR ACUTE FACIAL OR CALVARIAL FRAC
TURES ARE NOTED. AN OLD HEALED FRACTURE DEFORMITY OF THE RIGHT ZYGOMATIC AR
CH IS NOTED. A SMALL AREA OF PROBABLE CHRONIC CORTICAL ENCEPHALOMALACIA AND
ATROPHY OF THE SUPERIOR POSTERIOR RIGHT FRONTAL LOBE IS NOTED. THERE IS EX
TENSIVE SOFT TISSUE SWELLING OVER THE RIGHT FACE AND ORBIT WITH NO ACUTE FR
ACTURES.
SIGNED OFF ON 03/23/10 @ 8:53 BY VIRGINIA R COLLINS, TECHNICAL MEDICAL ASSO
NOTED
SIGNED OFF ON 03/23/10 @ 14:55 BY BENJAMIN F LEWIS JR, PHYSICIAN II
- ** ENCOUNTER: 318 X-RAY 03/22/10 10:48 LEE COMP
RECEIVED REPORTS ON CXR AND ORBITS. IMPRESSION- NORMAL.
SIGNED OFF ON 03/22/10 @ 10:48 BY VIRGINIA R COLLINS, TECHNICAL MEDICAL ASSO
- ** ENCOUNTER: 317 NARRATIVE 03/22/10 8:53 LEE COMP
INMATE CONSULT FOR OPHTHALMOLOGY CLINIC CAME BACK APPROVED BY DR. SAMPSON
ON 03/18/10. INMATE WILL BE SCHEDULED.
SIGNED OFF ON 03/22/10 @ 8:53 BY SANATHEA F MCCOY, MEDICAL ASSISTANT TECH I
- ** ENCOUNTER: 316 OUTSIDE RECOMMENDATI 03/19/10 17:27 LEE COMP
RETURN FROM IMAGE CARE. REPORT TO FOLLOW.
SIGNED OFF ON 03/19/10 @ 17:29 BY DELORES T JOHNSON, REGISTERED NURSE I
NOTED
SIGNED OFF ON 03/22/10 @ 10:35 BY BENJAMIN F LEWIS JR, PHYSICIAN II
- ** ENCOUNTER: 315 NARRATIVE 03/19/10 5:41 LEE COMP
3-18-10 22:45 INMATE SIGNED FORM STATING THAT HE UNDERSTANDS HE IS TO BE
NPO AFTER MIDNIGHT. INMATE SIGNATURE WAS WITNESSED BY M. PRATT LPN AND
OFC POLK IN SMU.
SIGNED OFF ON 03/19/10 @ 5:42 BY MARCUS A PRATT, LICENSED PRACTICAL NURSE
- ** ENCOUNTER: 314 FOLLOW-UP SICK CALL 03/18/10 18:49 LEE COMP
NP RABON CALLED TO ADV. IM IS TO BE NPO AFTER MN FOR CT IN THE AM. OFFICER
HANKINS OF SMU NOTIFIED OF IM BEING NPO AFTER MN. NPO FORM TO BE SIGNED.
MCRAE-BRUCE R.N.
SIGNED OFF ON 03/18/10 @ 18:52 BY LINDA MCRAE-BRUCE, UNCLASSIFIED
SIGNED OFF ON 03/19/10 @ 9:02 BY JUDY R RABON, NURSE PRACTITIONER III
- ** ENCOUNTER: 313 OUTSIDE APPOINTMENT 03/19/10 15:54 LEE COMP
AUTHORIZATION FOR APPOINTMENT WITH IMAGE CARE ON 03/19/10 AT 1230.
SIGNED OFF ON 03/18/10 @ 15:55 BY SANATHEA F MCCOY, MEDICAL ASSISTANT TECH I

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** ENCOUNTER: 312 DOCTOR'S CLINIC 03/18/10 15:47 LEE COMP
 IM BROUGHT TO MEDICAL FOR EVALUATION BY NP
 IM WAS IN ALTERCATION 2 DAYS AGO WITH SECURITY
 IM RECEIVED HEAD TRAUMA WITH BLACK RIGHT EYE WITH SCLERA HEMORRHAGE
 XRAYS COMPLETED REPORT PENDING
 IM RECEIVED BRUISING AND INJURY TO LEFT RIB CAGE (DEFORMITY NOTED)
 XRAYS COMPLETED REPORT PENDING
 IM RECEIVED BRUISING TO BOTH KNEES WITH SOFT TISSUE SWELLING OF LEFT KNEE
 XRAY ORDERED TO R/O FRACTURES
 IM STATES HE HAS SEVERE HEADACHE THAT WILL NOT GO AWAY AND LOSS OF MEMORY
 HEAD CT WITH & W/O CONTRAST ORDERED (CONSULT INITIATED)
 INITIATE ORTHO CONSULT
 MOTRIN & MUSCLE RELAXER GIVEN PER S.O. #27
 SIGNED OFF ON 03/18/10 @ 15:51 BY JUDY R RABON, NURSE PRACTITIONER III
 SO NOTED
 SIGNED OFF ON 03/22/10 @ 15:00 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 311 INSIDE APPOINTMENT 03/17/10 15:02 LEE COMP
 INMATE TO MEDICAL FOR RECHECK OF HIS VISUAL ACUITY. RIGHT EYE IS 20/100,
 LEFT EYE IS 20/50 AND BOTH EYES ARE 20/50. MS RABON CALLED AND A VERBAL ORDE
 R FOR OPHTHAMALOGY CLINIC AT KIRKLAND OBTAINED. CONSULT INITIATED AND FAXED
 FOR APPROVAL. KAREN COOPER RN
 SIGNED OFF ON 03/17/10 @ 15:04 BY KAREN C COOPER, UNCLASSIFIED
 NOTED
 SIGNED OFF ON 03/18/10 @ 8:18 BY JUDY R RABON, NURSE PRACTITIONER III

** ENCOUNTER: 310 X-RAY 03/16/10 14:20 LEE COMP
 CHEST, RT ORBIT AND ARCH XRAYED.
 SIGNED OFF ON 03/16/10 @ 14:20 BY VIRGINIA R COLLINS, TECHNICAL MEDICAL ASSO.

** ENCOUNTER: 309 SECURITY INIT 03/16/10 14:11 LEE COMP
 S> INMATE TO MEDICAL AFTER BEING GASSED LAST THURSDAY AND FALLING ON THE FLOOR
 AFTER BEING TAKEN OUT OF CELL AT NURSE'S REQUEST DUE TO THE FACT THAT THE
 INMATE COULD NOT CATCH HIS BREATH. STATES HE HAD A HISTORY OF ASTHMA. MEDICAL
 CLASSIFICATION STATES HE HAS HX OF STOMACH ULCERS NOT ASTHMA.
 O> TEMP=99.7 PULSE=111 RESP=20 BP=110/ 80 WEIGHT=200 PPD= 0
 INMATE IS COMPLAINING OF PAIN IN LEFT RIB AREA AND ALSO HIS RIGHT EYE. HE HA
 S NO BRUISING NOTED ON HIS CHEST AREA BUT DOES HAVE A BLACK EYE RIGHT SIDE.
 HE HAS SOME REDDNESS TO RIGHT SCLERA. LEFT EYE IS WNL. HIS V.A. ACUITY IS 20/1
 00 RIGHT EYE AND 20/50 IN HIS LEFT EYE. BOTH EYES ARE 20/50. WEARS LENSES
 A> SUBJECTIVE C/O OF PAIN TO LEFT CHEST AREA, DISCOLORATION TO RIGHT EYE
 P> MS RABON ORDERED X-RAY OF RIGHT ZYGOMATIC ARCH AND CHEST.
 X-RAYS OF CHEST AND RIGHT EYE COMPLETED. WILL BRING THIS INMATE BACK IN TO H
 AVE V.A. TEST ON 03/17/2010 WITH HIS LENSES. KAREN COOPER RN
 SIGNED OFF ON 03/16/10 @ 14:27 BY KAREN C COOPER, UNCLASSIFIED
 SIGNED OFF ON 03/16/10 @ 16:09 BY JUDY R RABON, NURSE PRACTITIONER III

** ENCOUNTER: 308 PPD 03/16/10 9:27 LEE COMP
 IMPLANT 03/05/10

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READ 03/08/10

NEGATIVE

D WIGGINS, GN

SIGNED OFF ON 03/16/10 @ 9:27 BY DONNA F WIGGINS, UNCLASSIFIED

** ENCOUNTER: 307 OUTSIDE APPOINTMENT 03/24/10 13:33 LEE COMP
AUTHORIZATION FOR APPOINTMENT WITH BEREKLEY ENDOSCOPY CENTER ON 03/24/10 AT
0930.
SIGNED OFF ON 03/15/10 @ 13:34 BY SANATHEA F MCCOY, MEDICAL ASSISTANT TECH I

** ENCOUNTER: 306 SECURITY INIT 03/11/10 16:51 LEE COMP
TO SMU TO SEE THIS INMATE AFTER HE WAS GASSED AND HE STATED THAT HE HAD AST
HMA AND SECURITY WAS REQUESTED TO BRING INMATE OUT OF CELL WHEN HE PROMPTLY
STARTED TO USE PUSH AND SHOVE HIS BODY. HE WAS PUSHED TO THE GROUND AND HE
NOW HAS A LUMP ON HIS HEAD ABOVE HIS RIGHT EYE. SECURITY ADVISED TO BRING TO
MEDICAL AFTER A SHOWER. ON RETURN TO MEDICAL INMATE WAS FOUND NOT TO HAVE A
HISTORY OF ASTHMA BUT OF PEPTIC ULCER DX IN PAST. KAREN COOPER RN
SIGNED OFF ON 03/11/10 @ 16:56 BY KAREN C COOPER, UNCLASSIFIED

** ENCOUNTER: 305 OUTSIDE RECOMMENDATI 03/03/10 7:42 LEE COMP
TO AND FROM OPTOMETRY CLINIC WITH THE FOLLOWING RECOMMENDATIONS.
1. RX READING GLASSES. KAREN COOPER RN
SIGNED OFF ON 03/03/10 @ 7:45 BY KAREN C COOPER, UNCLASSIFIED
OK
SIGNED OFF ON 03/03/10 @ 13:51 BY BENJAMIN F LEWIS JR, PHYSICIAN II
SIGNED OFF ON 03/04/10 @ 10:01 BY SANDRA T JONES, LICENSED PRACTICAL NURSE

** ENCOUNTER: 304 FOLLOW-UP SICK CALL 03/01/10 12:02 KIRKLAND COMP
I/M OFF HUNGER STRIKE PER MAJOR DEAN BY ACCEPTING FOOD TRAY.
D WIGGINS, GN
SIGNED OFF ON 03/01/10 @ 12:02 BY DONNA F WIGGINS, UNCLASSIFIED

** ENCOUNTER: 303 FOLLOW-UP SICK CALL 02/28/10 18:32 LEE COMP
I/M TO MEDICAL PER HUNGER STRIKE PROTOCOL
WEIGHT-170
BP- 118/70
PULSE- 85
TEMP-98.2
PER I/M AND LT RICHARDSON, I/M HAS NOT HAD BREAKFAST, LUNCH OR DINNER.
I/M STATES HIS STOMACH HAS BEEN VERY UPSET AND HE HAS HAD BLOODY STOOLS.
INST I/M HE NEEDS TO INTAKE PLENTY OF WATER. I/M STATES HE HAS NOT HAD
WATER IN APPROX 3 DAYS BECAUSE IT GIVES HIM VERY BAD INDIGESTION AND MAKES
HIS STOMACH HURT. I/M IS IN NO ACUTE DISTRESS. STATES HE HAS NOT VOMITED.
SIGNED OFF ON 02/28/10 @ 18:41 BY COURTNEY A DIXON, LICENSED PRACTICAL NURSE
CONTINUE HUNGER STRIKE PROTOCOL
SIGNED OFF ON 03/01/10 @ 13:41 BY JUDY R RABON, NURSE PRACTITIONER III

** ENCOUNTER: 302 FOLLOW-UP SICK CALL 02/27/10 13:45 LEE COMP
VITALS TAKEN ON IM ON HUGER STRIKE.
VS: 98.1 99 18 108/78 WGT: 169

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

Timothy GREEN #115830
Plaintiff

C/A: NO 6:14-CV-25
95-MGH-KFM.

✓
LT FRANKLIN RICHARDSON JR. et al
Defendants

CERTIFICATE OF SERVICE

I certify that All parties has been served
by Plaintiff depositing a copy of same in
U.S. MAIL with first class postage prepaid
Addressed

LEE ETER WILSON
MORRELL SMITH
126 NORTH MAIN ST.
P.O. BOX 580
SUMTER, SOUTH CAROLINA 29157

LEGAL MAIL

U.S. District Court

Timothy GREEN #113830
Plaintiffs
v.

6:14-CV-2595-

MGL-KFM

Lt. Franklin Richardson Jr. Defendants
And the rest of the defendants in
Summons in Civil Action.

There comes before this Honorable Court civil Action
1983. Plaintiff states Claims Against Defendants.

1). That defendant violated his Const. Rights as well as liberty
Rights civil by denying Plaintiff security by law provide to
to each inmate.

2). That defendants violated Plaintiff's Rights and civil liberties
by denying Plaintiff Adequate Medical treatment.

3). That defendant tried to coverup the Assault that
Lt. Franklin Richardson Jr. did to Plaintiff Timothy
GREEN #113830. Plaintiff states that the front of his shirt
had blood all over the front of it.

LEGAL MAIL

Plaintiff states that Lt. Franklin Richardson Jr. tried to conceal the fact that he brutally assaulted Plaintiff.

Plaintiff states that Lt. Franklin Richardson Jr. tried to deny Plaintiff medical treatment to cover up the assault.

3. Plaintiff Attorney has the picture Robert Butcher of the case and unusual punishment. *Hudson v. McMillian* 503 U.S. 1 1992 "excessive force" by prison guard at Eighth Amendment violation. Prison official punched Plaintiff numerous times Kicked Plaintiff in his side Slammed his head on the floor a few times Sprayed gas down his throat. Attorney Robert

Butcher has the pictures in his file. Plaintiff family and Plaintiff requested that Attorney Robert Butcher give him a copy of the pictures he took of Plaintiff and showed his family.

4. Defendants violated Plaintiff constitutional rights and deliberately denied Plaintiff medical attention while Plaintiff asked nurse Pratt and nurse Jones

LEGAL MAIL

Plaintiff for assistance. And was denied Plaintiff
complained about his stomach for months and his throat
and tongue. Plaintiff finally saw Nurse Franklin,
and Nurse Moody who saw the blisters on
Plaintiff tongue and throat. The burning of his
throat stomach and behind part for months,
from the gas Lt. Franklin Richardson Jr.

This is deliberate indifferent and Eighth Amend-
ment violation. *Estelle v. Gamble*, 429 U.S. 97,
103 (1976) The Supreme Court explained
that is because and inmate must rely on prison
authorities to treat his medical needs; if the
authorities fail to do so, those needs will
not be met.

Prison officials put Plaintiff in the corner on
lockup so that he would be seen. Hiding him
from the rest of the officers and inmates.

Plaintiff was throwing up the gas that Lt. Franklin Richardson Jr. sprayed it down his throat. The defendants knew what Lt. Franklin Richardson Jr. was getting ready to do. That why that ran into the office so they couldn't witness it. Lt. Franklin Richardson Jr. has been assaulting numerous inmates while in handcuffs. Attorney Robert Butcher has numerous statements to this fact. I am requesting his files all grievances to all allegations against him and defendants. Doctor gave Plaintiff medication that took Plaintiff's sight and smell Plaintiff up with water in his arms, hands, legs knees and feet. Plaintiff sent the medicine to his attorney Robert Butcher along with statements. They administration said that he sent it back to them. HERE'S THE GRIEVANCES

LEGAL MAIL

evidence. They went into a letter sent to
his Attorney. Someone told me that Attorney
Robert Butcher is selling me out. They told
me to ask him for the pictures. He never
sent them to me. I am requesting his entire
file. He has not sent it so I can prepare
my case before this court. And perfect
my case. He has the files. I pray that
this honorable court will order Attorney
Robert Butcher send the entire file along
with "pictures" of Plaintiff injuries.
When this honorable court takes the
statements from the inmates a lot of people
will go to jail. And this honorable court
grant me a trial. I promise you a lot of
people will go to prison and get freed.

LEGAL MAIL

Also she told me that S.C.D.C. should be liable for my treatment. They never told me I had hepatitis C. At Allendale. They kept it a secret from me. The nurse told me to review my medical file and make them treat me.

I filed grievances and never got a response. It's been about two years and more.

This is deliberate indifference as well. When the state gave me a ~~disease~~ disease they are responsible for treatment. She said they check blood urine and stool for everything I was clean. I don't have sex I am very religious and godly. I pray this honorable court order Attorney Robert Butcher to send me my complete file with pictures and medical records. To perfect my appeal and my case before you. I pray.

IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
803-462-3680

Name: Green, Timothy 113830
Patient ID: 1000038843
DOB: 02/14/1964

Exam Date: 03/19/2010
Exam: CT Head w and wo Contrast
Reason: head truma, lost of memory,
headaches
Referrer: Lee CI, SCDC

Acc#: 513431
Patient Phone #:

CT SCAN OF THE HEAD WITHOUT AND WITH INTRAVENOUS CONTRAST

CLINICAL HISTORY: Head trauma.

TECHNIQUE: Contiguous 5 mm axial images were obtained before and after intravenous administration of 50 cc of Isovue 370. Additional 3 mm axial images through the orbits were obtained.

FINDINGS:

The ventricles and subarachnoid spaces are normal with no evidence of intracranial hemorrhage. There is a small ill-defined area of cortical atrophy probably due to chronic encephalomalacia within the superior posterolateral portion of the right frontal lobe, seen on axial unenhanced scans 26 and 27 and on contrast-enhanced images 63 and 64. No abnormal intracranial enhancement is noted. There is considerable soft tissue swelling over the right face, orbits, and frontal calvarium. No acute fractures are noted. An old fracture deformity of the right zygomatic arch is noted with medial bowing of the right zygomatic arch but without evidence of an acute fracture. The paranasal sinuses and temporal bones are well-pneumatized and clear. The craniocervical junction is normal anatomically.

IMPRESSION:

NO INTRACRANIAL HEMORRHAGE OR ACUTE FACIAL OR CALVARIAL FRACTURES ARE NOTED. AN OLD HEALED FRACTURE DEFORMITY OF THE RIGHT ZYGOMATIC ARCH IS NOTED. A SMALL AREA OF PROBABLE CHRONIC CORTICAL ENCEPHALOMALACIA AND ATROPHY OF THE SUPERIOR-POSTERIOR RIGHT FRONTAL LOBE IS NOTED. THERE IS EXTENSIVE SOFT TISSUE SWELLING OVER THE RIGHT FACE AND ORBIT WITH NO ACUTE FRACTURES.

Martin P. Dommers, M.D.
Electronic Signature
Date Finalized: 03/19/2010

DD: 03/19/2010 DT:03/19/2010

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

INMATE GRIEVANCE FORM

STEP 1

Office Use Only

INMATE NAME: Timothy GreenGrievance No. Lee CT 024612SCDC NUMBER: 113832Code: General 702/72INSTITUTION: LEE CORR INST.

JAN 30 2012

Policy _____

Disc. Hear. _____

Class. _____

HOUSING UNIT: DARLINGTON S. 1246Date Received 1/30/12

WORK ASSIGNMENT: _____

IGC Initials 20

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

ON the 25th 26th and 27th I spoke to each officer off street sets ~~_____~~ ~~_____~~ on the yard. About my diet. I have ulcers 2 different kinds salmon and that other Red meat they serve hurts my stomach. I haven't eaten since the first 2 times they serve my stomach is raw and burning. I've written my lawyer concerning this matter. I've written the kitchen as well.

ACTION REQUESTED: That officers and kitchen servers be suspended for my suffering without pay.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I spoke with Sgt. Anderson officer Street Street call the kitchen. They said that they was not going to send me anything.

Timothy Green 1-27-12
Grievant Signature Date

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed for the following reasons. You have not provided a specific date of incident. You alleged that you spoke to each officer on the 25th, 26th and the 27th but you have not provided the month that you allegedly spoke to staff. Your grievance is also being returned due to vagueness. You have not provided the name of the alleged sergeants or officers that you spoke to about your alleged food. Your grievance is also being returned because your informal resolution attempt is insufficient. An informal resolution attempt must be made with the appropriate supervisor. I suggest that you submit a request to staff to A/W Brooks to address your concerns due to the fact the Cafeteria falls under his area of supervision. You have five (5) days to correct and resubmit this grievance by submitting a new grievance form to the grievance office by 02/07/12. If not received by this date, this issue will be closed. Return this form with your corrected grievance for date verification.

IGC Signature R Johnson 1/31/12

Date

Grievant Signature

Date

- ☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy Green
SCDC NUMBER: 113850
INSTITUTION: LEE CORRI INST.
HOUSING UNIT: DARLINGTON S. 1246
WORK ASSIGNMENT: JAN 30 2012

Office Use Only
Grievance No. Lee 10245-12
Code: General ne/chl
Policy _____
Disc. Hear. _____
Class. _____
Date Received 1/31/12
IGC Initials [Signature]

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

I've written
NUMEROUS REQUEST FOR SICK CALL. I HADN'T SEEN
ANYONE YET. MY KNEES AND STOMACH IS KILLING ME.
I'M HAVING PAINS IN MY CHEST AND STOMACH AND
MY KNEES I CAN'T REST AT NIGHT.

ACTION REQUESTED:

THAT I GET THE MEDICAL ATTENTION
THAT'S NEEDED.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

WRITTEN NUMEROUS REQUEST TO MS RABON
AND SICK CALL.

Grievant Signature

Date

[Signature] 1-27-12

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed because you have failed to state a specific date of the alleged incident. You have not provided a specific date as to when you submitted numerous request for sick call. Your grievance is also being returned because your informal resolution attempt is insufficient. An informal resolution attempt must be made with the appropriate supervisor. I suggest that you submit a request to staff to Nurse McDonald to address your concerns due to the fact medical falls under her area of supervision. You have five (5) days to correct and resubmit this grievance by submitting a new grievance form to the grievance office by 02/07/12. If not received by this date, this issue will be closed. Return this form with your corrected grievance for date verification.

- ☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

IGC Signature

Date

[Signature] 1/31/12

Grievant Signature

Date

Request to Staff Member

GRIEVANCE CORR.
OFFICE

1-4-10

Timothy GREEN

#113830

LEE CORR. INST.

Chesterfield North
Rm #2110

This is A Notice of intent upon this office GRIEVANCE
I have been filing legitimate GRIEVANCES in this office
And nothings never done about the situation in the Chesterfield
UNIT. I'm going to file GRIEVANCES on this office. For not
Complying to the Rules and Regulations of this office
AND Post. I've sent A letter to INMATE GRIEVANCE BRANCH
Mr. Michelle White at Headquarters.
I'm also sending A letter to SENATOR Ralph Anderson.
And in PREPARING 1983 civil Actions against this office.
And upon the Warden Paula Deputy Warden Bell & Major
Dean, Lt. Richardson, Captain Johnson & Deputy Warden
Brinks. For the violation of state and Federal Rights
And Constitution, As well as Civil Rights.
This is your Notice upon this office and institution.
Thank you.

State of South Carolina
Court of Appeals

Timothy Green Plaintiff

v.

Motion Attaching Summary
Judgment & Requesting
A New Hearing on the facts.
C.A. No.: 2011 CP-31-0187

Lt Franklin Richardson Jr. & S.C.D.C Medical staff

This Matter comes before this Honorable Court Refuting Summary
judgement in this Civil Action. Plaintiff states that he can
prove deliberate indifference. Plaintiff was beaten by Lt. Franklin
Richardson Jr. severely and placed on lockup in a corner
room where no one could see him. Plaintiff wrote
request to the investigator and Bishopville County lock
trying to get him arrested. Plaintiff "eye" right was
closed shot his whole right side of his face was
swollen. Plaintiff tried to get medical attention
the next day from Nurse Jones. She wouldn't stop
and talk to him. He tried to talk to nurse
Frank and he wouldn't talk to him. That same
day of the incident Nurse Cooper told them

LEGAL MAIL ONLY

to bring me to her office. But they didn't. I told them that my throat and stomach was burning. They said nothing but gave typhoid pills. For months my throat was sore I blisters on my tongue as well. After being on lockup for about "6" months. I seen Nurse Franklin and Nurse Moody they looked down my throat and saw the Hinters. It's in the records at medical. I made sure it was documented. Nurse Practitioner Rabon treated me for my throat for about three & 3/4 months are more. My ribs was so sore and my knees you can see that something is badly wrong. And the vision in my right eyes is still blurred. Lt. Franklin Richardson Jr. stated he never hit me or anything but I have officers as witnesses and an inmate worker saw it all. Lt. Richardson Jr. was slamming my head on the floor I'll take a lie detector test. I been asking for one since day one. I seen the eye doctor at Kirkland on many occasions about my eye. the doctor stated in front of officer Lucky and of Mickens that I got beaten real good. And that I was being treated for a cut on my eyeball from

that beating. It's in medical Record the badly swollen eye
with a cut on it. Deliberate indifference to serious
Medical needs of prisoners constitutes the unnecessary
and wanton infliction of pain proscribed by the Eighth
Amendment. In order to prevail on a constitutional
claim of inadequate medical care. Nurse Cooper came
up to "S.M.U" lockup because Lt. Richardson Sr. sprayed
gas down my throat. And I told them that this man
sprayed gas down my throat. He always tried to treat
us like we were the lowest thing on this earth. But
I found out that he was a sex stripper. How could I
act out the way they stated when I had just came
off of a hunger strike. I went without food and water
for 19 days. But they had documents of 12 days. They
said that we had to go 4 days before they could
document it. I lost 60 lbs. And I was too weak
to fight with these people or argue with them.
I lost so much weight that the guys on lockup
didn't recognize who I was. Everybody on this
yard will tell you Lt. Franklin Richardson Jr. assaulted
me.

LEGAL MAIL ONLY

Proof of deliberate indifference may be established by direct or by circumstantial evidence. Some of the types of direct evidence prisoners present sick call requests for medical attention or records reflecting:

1. The dates when medical attention was requested to whom the requests were submitted

the medical conditions complained of the effects of any delay in obtaining access to medical staff;

the dates when access was provided;

specific medical staff seen.

Attorney Robert J. Butcher has the pictures of my face, my knees and my bruised ribs. Request that he send you a copy. When he showed

my family the pictures they couldn't believe that an officer of the law could do such a thing.

treatment provided by particular staff. the nature of follow-up care ordered and whether it was carried out. Additional information to indicate the adequacy of treatment and complaints and formal grievances filed regarding the inadequate care. See grievances on medical staff.

THE INADEQUATE MEDICAL CARE, WAS THE REQUEST TO JONES
AND PRATT BOTH NURSE IGNORED PLAINTIFF COMPLAINT ABOUT
WOUNDS HIS EYE RIBS AND KNEES. WHICH ARE STILL BEING
NEGLECTED. PLAINTIFF STILL SUFFERS FROM CHRONIC PAINS. CHECK
MEDICAL FILES. PLAINTIFF'S TOES FEELS LIKE THEY ARE GOING
TO BREAK OFF. MEDICAL PRECIBED MEDICINE PLAINTIFF BLOOD
PRESSURE MEDICINE FOR CHRONIC HEADACHES FROM HIS
HEAD BEING SLAMMED ON THE FLOOR. PLAINTIFF DON'T EVEN
HAVE HIGH BLOOD PRESSURE MEDICINE THAT SWELL MY SHOULDER
FEET AND LEGS WITH WATER. AND TOOK MY SIGHT. I THOUGHT
I WAS GOING TO DIE. MY LAWYER I SENT THE MEDICINE
TO HIS OFFICE. THE MAILROOM INVESTIGATOR AND CONSTABLE
AND THE CAPTAIN WENT INSIDE MY LEGAL MAIL TO MY
ATTORNEY. WHICH IS A VIOLATION OF MY CONSTITUTIONAL
RIGHTS ATTORNEY-CLIENT RELATIONS.
AND HE DID NOTHING WHEN I TOLD HIM ABOUT IT.
FROM THE MEDICINE I CAN'T WEAR SHOES ANYMORE.
FROM THE ASSAULT BY LT. FRANKLIN RICHARDSON SR
I HAVE PAINS IN MY EYE + CHRONIC HEADACHES.
MY RIGHT EYE STILL HAS BLACKNESS AROUND IT.

My KNEES ARE still killing me. And they ARE still swollen.

My STOMACH is killing me. I have two "2" types of Ulcers
Now since he sprayed the gas down my throat.

Gastro Ulcers and bleeding Ulcers. When FRANKLIN
Richardson Jr. Jumped down in my side with
his KNEE and started punch Plaintiff in his face.

All the officers ran into the shift office. Only
Officer FARMER picked me up off the floor. My
Vision was blurred from the beating. While

I was in handcuffs. I was weighing 146 lbs
down from 210 lbs. I was weak from the
hungerstrike. And in handcuffs what could

I do. My Mouth and stomach was on fire.

I couldn't eat for days afterwards I live
off of milk and bread. Ask Ofc. Thompson.

My Lawyer NEVER got depositions from these
Critical witnesses. Estelle v Gamble 429 U.S. 97

103 (1976) West v. Atkins 487 U.S. 42, 57-58 (1988)

Richardson v. McKnight 521 U.S. 399 (1997)

Estelle, 429 U.S. At 104 FARMER v. BRENNAN

511 U.S. 825, 836 (1994) (L)

Id At 843 Brady v. Puckett 157 F.3d 1022 (5th Cir
(1998) Brock v Wright 315 F.3d 158, 1162 (2nd Cir 2003)
Hud 503 U.S. At 10, 109 S.Ct At 997, 1000 Riley v Dorton
Riley v. Dorton 115 F.3d 1159, 1168 (4th Cir 1997)
spraying gas down a prisoners throat is de minimis.

What is deliberate indifference? According to the
Supreme Court, deliberate indifference is a state of
mind more blameworthy than mere negligence but
less culpable than purposeful misconduct. See Farmer
511 U.S. At 835. Deliberate indifference holds
that a prison official will be held liable under
the Eighth Amendment. Only if he knows that
inmates face a substantial risk of serious harm
and disregards that risk by failing to take
reasonable measures to abate it. Id. At 847
Under this test, prisoners alleging Eighth
Amendment violations need not show that a prison
official acted or failed to act believing that
harm actually would befall an inmate; it is enough
that the official acted or failed to act despite his
knowledge of a substantial risk of serious harm
Id. At 842.

I HAVE WITNESSES THAT WAS THERE AND HEARD NURSE COOPER TELL THE OFFICERS + LT. RICHARDSON JR. TO BRING TO MEDICAL AFTER THE ASSAULT. I CAN BLOW THIS CASE OUT OF THE WATER. AND THAT THEY PUT ME IN A CORNER ROOM TO ~~SE~~ AND HEAL BEFORE ANYONE KNEW ABOUT THE ASSAULT.

THE EIGHTH AMENDMENT REQUIRES THAT PRISON OFFICIALS PROVIDE A SYSTEM OF READY ACCESS TO ADEQUATE MEDICAL CARE.

PRISON OFFICIALS SHOW DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS IF PRISONERS ARE UNABLE TO MAKE THEIR MEDICAL PROBLEMS KNOWN TO THE MEDICAL STAFF OR IF THE STAFF IS NOT COMPETENT TO EXAMINE THE PRISONERS, DIAGNOSE ILLNESSES, AND THEN TREAT OR REFER THE PATIENT. THE PRISON MUST ALSO PROVIDE AN ADEQUATE SYSTEM FOR RESPONDING TO EMERGENCIES.

IF OUTSIDE FACILITIES ARE TOO REMOTE OR TOO INACCESSIBLE TO HANDLE EMERGENCIES PROMPTLY AND ADEQUATELY, THEN THE PRISON MUST PROVIDE ADEQUATE FACILITIES AND STAFF TO HANDLE EMERGENCIES WITHIN PRISONS.

SEE IMAGE CARE & GRIEVANCES.

I KNOW THAT I AM SERIOUSLY SICK FROM THE WAY WE WERE BEING FED AND TREATED. ASK SENATOR RALPH ANDERSON.

Clement v. Gomez 298 F.3d 898, 904 (9th Cir 2002)

Green v. Daley 414 F.3d 645, 653 (7th Cir 2005) Brock v.

Wright 315 F.3d 158, 163-64 (2nd Cir 2003) Clement v. Gomez

298 F.3d 898 (9th Cir 2002) Ellis v. Butler 890 F.2d 1001,

1003 (8th Cir 1989). Bouchard v. Magnusson 715 F. Supp. 1146,

1148 (D. Me 1989)

Lt. Richardson stated that I call him an ex-stripper, while in a holding cell 4 feet wide and 4 feet long. Plaintiff only asked him what was he being locked up for? What he didn't realize that I wasn't one of the guys that allowed him to jump on me and wait for get back, knowing how corrupt the Administration is. I had to get a guy down stairs to contact my family and let them know what happened. 6 days later my niece contact Robert Butcher. He came up and took pictures of my wounds. There so many people that's been hurt by him and other officers. Most can't read or write. And they tell the guys that file grievances they are switching and fail for it.

Immunity in "NO" forms can be granted to him on summary judgement because the genuine issues of material fact existed precluding summary judgement, on whether prison guards complied South Carolina's official policy governing use of force when inmate has been restrained and

IN A holding cell. Policy does NOT state that A prison official
CAN USE MACE OR GAS WHEN AN INMATE IS RESTRAIN AND behind
doors. Plaintiff was NOT kicking AND hanging ON cell door.
Plaintiff states that he has official witnesses that his lawyer
was told to get depositions from. Plaintiff has A expert witness
statements AND with officers present saying that he was
punched in the eye repeatedly.

Plaintiff states that he CAN PROVE COLORFUL PROOF ACERTAIN
Plaintiff who asserts malicious AND sadistic USE OF FORCE
NEED NOT show that force CAUSED extreme deprivation OR
SERIOUS OR significant pain OR injury to establish Eighth
Amendment cause of action. All that is necessary is
proof of more than de minimis pain OR injury.

This is proof through material facts the cause of injury
AND that Lt. Franklin Richardson Sr. did brutally beat
inmate Timothy Green ask him to take a lie detector
test that he didn't beat plaintiff in the face. AND
stom his head on the floor AND drop down on
plaintiff side. AND spray gas down his throat AND
it WASN'T PERSONAL. If PASS I'll drop this case.

I KNOW just as Moses stood before the burning
bush he'll fail. Williams v. BENJAMIN 77 F.3d 756. 14th
Cir. 1996).

There is a genuine issue of material fact is technically
a question of law but its Resolution depends on an
assessment of the evidence submitted in support of
the Plaintiff Johnson v Jones U.S. 115 S.Ct 2157, 132
L. ed. 2d. 238 (1995) 115 S.Ct. At 2156-58

It occurs to the fact that Lt. Franklin Richardson Jr. by Acting
out his personal feeling because of all the paperwork I
was filing on him. Defendant hasn't enlightened this
Court on the score of what's really going on.
See Grievances and that we were bringing heat on
him and everyone else about the abuse and
cruel and unusual punishment that was dealt out
to us. Robert Butcher has the statements.

Schertz v. USAUPACA County, 875 F.2d 578, 583 (7th Cir.
1989). But misuse of official authority for private ends
is a recurrent feature of cases in which a deprivation
of life, liberty, or property without due process
of law is found. Screws v. United States, 325
U.S. 91, 93, 111, 65 S.Ct. 1031, 1032, 1040, 89 L. ed.
1495 (1945) Gibson v. City of Chicago 910 F.2d
1510, 1518 (7th Cir 1990).

The distinction is between an act that is justifiable
if considered without regard to the Actor's Motive

objectively justifiable, is explicable only in terms of the Actor's Motivation, as in a case of police brutality so egregious that it can be explained only by reference to a racist or other improper motive for the defendant officer's action.

INEFFECTIVE ASSISTANCE OF COUNSEL ATTORNEY MISCONDUCT. ATTORNEY WAS TOLD TO FILE SUIT AGAINST LT. FRANKLIN RICHARDSON JR. AND MEDICAL AT LEE COUNTY OR THE MEDICAL AGENCY. SEE AFFIDAVIT OF RECORDS CUSTODIAN. PLAINTIFF STATES THAT HIS LAWYER IS A CIVIL ATTORNEY & COUNSELOR, A PROFESSIONAL IN HIS CRAFT. THERE'S NOWAY POSSIBLE THAT ATTORNEY COULD HAVE FILED SUIT AGAINST THE DEPARTMENT. ATTORNEY VIOLATED RULE OF PROFESSIONAL CONDUCT. RULES VIOLATED RULE 4D7, SCALR; RULE 1.1 FAILING TO PROVIDE COMPETENT REPRESENTATION; RULE 1.2 FAILING TO ABIDE BY A CLIENT'S DECISIONS CONCERNING THE OBJECTIVES OF REPRESENTATION AND FAILING TO CONSULT WITH THE CLIENT AS TO THE MEANS BY WHICH THEY ARE TO BE PURSUED; RULE 1.3 FAILING TO ACT WITH REASONABLE DILIGENCE AND PROMPTNESS WHILE REPRESENTING A CLIENT; RULE 1.4 FAILURE TO KEEP A CLIENT REASONABLY INFORMED ABOUT THE STATUS OF A MATTER AND FAILING TO

Promptly Comply with Requests for information, Rule 1.7,
Rule 1.8, Rule 2.1 Rule 8.4 (CA) 8.4(E).

Plaintiff Attorney should've known that Plaintiff
couldn't see S.C.D.C. BECAUSE Plaintiff told Mr.
Butcher when he went over his federal case
with him. Plaintiff states that he filed into
the Administrative Law Judge div. but never heard
from them. And was told that it was dismissed
because he didn't show where a liberty interest
was involved. Loss of good time visitation, earned
work credits. Check Admin. Law Court Rules.

Plaintiff states that summary judgment should
set aside to allow Plaintiff to present his
case before this honorable court.

Plaintiff states that with certainty that he can
show this Honor Court light within this case.
With solid material evidence, I pray this Honor
Court. I AM.

Sumather Deen

In The United States District Court For The District
Of South Carolina

Plaintiff first set of interrogatories
to defendants.

Timothy GREEN # 113830
v. Plaintiff

Civil Action No: 9109-CV-03270
-DCN - BM.

TERRY BRACEY Red Team Major, Deputy Warden Charles Robin,
Warden Anthony Padola. Ass. SMO Bruce OBERMAN, Grievance Corr.
LATHERINE JAMES, Deputy Warden Margaret Bell, Sgt. FRANKLIN BORDMAN SMO.
LAUS KIRAZIAN JEWELLER LIVINGSTON, Major JAMES DEAN, SANDRA SIMMONS
BRACEY Mail Room, D.H.D. SHARON PATTERSON, Sgt. CAROL DAVIS SMO.
WARDEN WILLIE EAGLETON, Michelle Gibson Property Control, Contraband Lt.
JAMES GRAHAM, Lt. PATRICIA A. GRAHAM, Grievance Corr. LETA JONES SMO,
Major STEVEN NOLAN, Grievance Corr. Ethel Redfeard, Lt. FRANKLIN
RICHARDSON, Grievance Corr. SUE H. SKIPPER, defendants

IN ACCORDANCE WITH Rule 33 of the Federal Rules of Civil Procedure,
Plaintiff Requests that defendants ANSWER the following interrogatories
UNDER OATH, AND that the ANSWERS be signed by the persons making them
AND be served ON Plaintiff within "30" days of service of these
interrogatories.

If you CANNOT ANSWER the following interrogatories in full AFTER
EXERCISING due diligence to SECURE the information to do so, so state
AND ANSWER to the extent POSSIBLE.

SPECIFYING YOUR inability to ANSWER the REMAINDER, AND stating what-
EVER information OR knowledge you HAVE CONCERNING the UNANSWERED
PORTIONS.

THESE INTERROGATORIES shall be deemed CONTINUING SO AS to
REQUIRE SUPPLEMENTAL ANSWER AS NEW AND different information
MATERIALIZES.

First questions for defendants

1. CONCERNING Plaintiff's legal box question to Major Terry Bracey,
WARDEN WILLIE EAGLETON, Deputy Warden Robin Charles, Lt. Contraband
JAMES GRAHAM, Property Control Michelle Gibson, SUE H. SKIPPER AND
Ethel Redfeard, why weren't Plaintiff legal box given to him? when
Herbert McDowell was given back to him the same night?
Strict Proof
2. why did WARDEN WILLIE EAGLETON AND Deputy WARDEN Robin Charles kept
telling Plaintiff that it would be given back to him? AND Plaintiff
NEVER RECEIVED his legal box? Strict Proof.

3. Plaintiff filed GRIEVANCES about his legal box but defendants began to Act As though Plaintiff NEVER had his legal box taken at all? Why WERE these MATTERS taken knowing that Plaintiff was ON APPEAL? And had so much information clearing him of his CHARGE against him. Why WERE MATTERS taken in an IRRESPONSIBLE MANNER? STRICT PROOF
4. Why when Plaintiff wrote Requests After Requests to the defendants they NEVER RESPONDED? STRICT PROOF
5. Plaintiff contacted Lt. James LORAHAM and Major STEVEN NOLAN about his legal box they REFER him to the WARDEN AND Deputy WARDEN. But when Plaintiff filed Requests to staff to Major STEVEN NOLAN and Lt JAMES LORAHAM NO RESPONSE. Why defendants wouldn't RESPOND to his Request? When defendants PROMISED Plaintiff HE would BE RECEIVING his legal box BACK why?
6. Why when Plaintiff filed 1983 CIVIL COMPLAINT at EVANS AND LEE CORRECTIONALS INSTITUTION they wouldn't send it out?
7. Why when Plaintiff had Sgt. Commissioner filed incident report about his T.V. being stolen because he left Plaintiff ROOM DOOR OPEN. Why WASN'T Plaintiff RECEIVED his T.V. OR GIVEN ANOTHER T.V. IN REPLACEMENT. STRICT PROOF
8. Why WASN'T Plaintiff and other muslims being NOTIFIED that PORK WAS IN SAUSAGE? And why WAS both box labels taken out of Plaintiff's duffel bag that stated PORK WAS IN the sausages? STRICT PROOF
9. Defendants Attorney said that if defendants violated Plaintiff's Rights by not giving him legal supplies AND not giving him legal books And in A timely MANNER. And wouldn't allow legal MAIL to GO OUT wasn't COUSINESS of these violations. So why did CFC Sgt. CARL DAVIS over the phone call legal Counsel about the MATTER instead of ME? STRICT PROOF
10. Why didn't Plaintiff HAVE the right to ACCESS to the COURT? And why did defendants block Plaintiff MAIL from going out? Why Plaintiff had to go through all sorts of CHANNELS and still wasn't Allowed to SEND his legal MAIL out WITH NOTICE from the SUPREME COURT? Defendants SAID time limit on the SUPREME COURT NOTICE? STRICT PROOF
11. Why didn't defendants send Plaintiff LEGAL MAIL out when they send SUPREME COURT NOTICE? Along with time limit STRICT PROOF
12. So why did defendants blocked Plaintiff 1983 COMPLAINT from coming into the COURTS at LEE CORR. INST. and at EVANS CORR. INST.? STRICT PROOF

3. Plaintiff filed grievances about his legal box but defendants began to act as though Plaintiff never had his legal box taken at all? Why were these matters taken knowing that Plaintiff was on appeal? And had so much information clearing him of his charge against him. Why were matters taken in an irresponsible manner? Strict Proof
4. Why when Plaintiff wrote requests after requests to the defendants they never respond? Strict Proof
5. Plaintiff contacted Lt. James Lora Ham and Major Steven Nolan about his legal box they refer him to the warden and deputy warden. But when Plaintiff filed requests to staff to Major Steven Nolan and Lt James Lora Ham no response. Why defendants wouldn't respond to his request? When defendants promised Plaintiff he would be receiving his legal box back why?
6. Why when Plaintiff filed 1983 civil complaint at Evans and Lee Correctionals Institution they wouldn't send it out?
7. Why when Plaintiff had Sgt. Cummings filed incident report about his T.V. being stolen because he left Plaintiff room door open. Why wasn't Plaintiff received his T.V. or given another T.V. in replacement. Strict Proof
8. Why wasn't Plaintiff and other muslims being notified that pork was in sausage? And why was both box labels taken out of Plaintiff's duffel bag that stated pork was in the sausages? Strict Proof
9. Defendants attorney said that if defendants violated Plaintiff's rights by not giving him legal supplies and not giving him legal books and in a timely manner. And wouldn't allow legal mail to go out wasn't awareness of these violations. So why did CEC Sgt. Calus-Davis over the phone call legal counsel about the matter in front of me? Strict Proof
10. Why didn't Plaintiff have the right to access to the court? And why did defendants block Plaintiff mail from going out? Why Plaintiff had to go through all sorts of channels and still wasn't allowed to send his legal mail out with notice from the supreme courts? Defendants said time limit on the supreme court notice? Strict Proof
11. Why didn't defendants send Plaintiff legal mail out when they send supreme court notice? Along with time limit strict Proof
12. So why did defendants blocked Plaintiff 1983 complaint from coming into the courts at Lee Corr. Inst. and at Evans Corr. Inst.? Strict Proof

13. why when Plaintiff filed grievances concerning these issues at each Institution LEE AND ELIAS, why wasn't these issues handle properly by grievance corps. At both institutions? Strict Proof see CHARLE BROWN off in Amendment complaint. Also look A grievances and dates also lawyer was more like them. Strict Proof
14. why when Plaintiff filed grievances Against D.H.O. SHARON PATTERSON it wasn't filed? And why did WARDEN ANTHONY PADULA have the grievance instead grievance corps. WARDEN mailed it back to ME NONPROCESS? Strict Proof
15. why do grievance corps. LEE & Johnson (setup) misdoing for staff members and officers? see grievances dates. you'll see the cover of AND MY ATTORNEY HAS the others. Strict Proof
16. DON'T GRIEVANCE CORPS suppose to take the sides of staff members? don't they suppose to investigate charges before they go the WARDEN? Strict Proof
17. DO GRIEVANCE CORPS. suppose to take the sides of staff members? And why do grievance corps. Take the sides of staff members without investigating, but take the words of staff and security? Strict Proof
18. why do D.H.O. SHARON PATTERSON states she never got Plaintiff witness list when both times list was in the mail? IS this the standards of AVEROPS? Plaintiff also gave a witness list to Sgt. CAIN SMO Sgt. WALTER RECREATION & SHAWERS Strict Proof
19. Plaintiff states why did WARDEN REVIEW charges properly And grievance corps. when SECURITY turned in witness list the second time so Plaintiff could ~~have~~ have proof of that he sent in a witness list? See REQUEST to WARDEN PADULA Strict Proof
20. why defendants lied that Plaintiff NEVER received his T.V. back when Lt. CONTRA and Lt. JAMES BRAHMAN gave it back to him? Strict Proof
21. Plaintiff wants to know why Red team WAS order to take his legal box? And Strict Proof
22. Plaintiff Ask why wasn't his Religious books Replaced that the Red team tore the backs off? And why his legal box was targeted? Strict Proof
23. why wasn't Plaintiff Rights was violated by Medical by not wanting to have him checked out until he got worse?

24. Why Medical At both LEE AND EVANS denied him Medical treatment when Plaintiff told them of severe stomach pains that wouldn't let him sleep?
Plaintiff Also ASK to have his livers checked because his urine had a very bad smell defendants refuse. And Plaintiff told them that he might've gotten hepatitis B from the contaminated water at Alhuda's, LEE, AND EVANS?
strict proof

25. Plaintiff states that this sickness came about after worrying about his legal box that the information that was in his legal box was vital to his case. And his constitutional rights as well as civil rights were violated. That would have proved his innocence.
Plaintiff states that defendants allow his conditions to become this way by not allowing him to get checked out.
defendants neglected Plaintiff's rights by denying him the medical attention he needed. Why was Plaintiff denied these rights?
strict proof.

Before this Honorable Court of the United States District and District of South Carolina.

Timothy Green 5/11/10

Timothy Green #113230
ASU South Row #167
LEE CORR. INST.
990 WISACKY Hwy.
Bishopville S.C. 29010

IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
803-462-3680

Name: Green, Timothy 113830
Patient ID: 1000038843
DOB: 02/14/1964

Exam Date: 03/19/2010
Exam: CT Head w and wo Contrast
Reason: head truma, lost of memory,
headaches
Referrer: Lee CI, SCDC

Acc#: 513431
Patient Phone #:

CT SCAN OF THE HEAD WITHOUT AND WITH INTRAVENOUS CONTRAST

CLINICAL HISTORY: Head trauma.

TECHNIQUE: Contiguous 5 mm axial images were obtained before and after intravenous administration of 50 cc of Isovue 370. Additional 3 mm axial images through the orbits were obtained.

FINDINGS:

The ventricles and subarachnoid spaces are normal with no evidence of intracranial hemorrhage. There is a small ill-defined area of cortical atrophy probably due to chronic encephalomalacia within the superior posterolateral portion of the right frontal lobe, seen on axial unenhanced scans 26 and 27 and on contrast-enhanced images 63 and 64. No abnormal intracranial enhancement is noted. There is considerable soft tissue swelling over the right face, orbits, and frontal calvarium. No acute fractures are noted. An old fracture deformity of the right zygomatic arch is noted with medial bowing of the right zygomatic arch but without evidence of an acute fracture. The paranasal sinuses and temporal bones are well-pneumatized and clear. The craniocervical junction is normal anatomically.

IMPRESSION:

NO INTRACRANIAL HEMORRHAGE OR ACUTE FACIAL OR CALVARIAL FRACTURES ARE NOTED. AN OLD HEALED FRACTURE DEFORMITY OF THE RIGHT ZYGOMATIC ARCH IS NOTED. A SMALL AREA OF PROBABLE CHRONIC CORTICAL ENCEPHALOMALACIA AND ATROPHY OF THE SUPERIOR-POSTERIOR RIGHT FRONTAL LOBE IS NOTED. THERE IS EXTENSIVE SOFT TISSUE SWELLING OVER THE RIGHT FACE AND ORBIT WITH NO ACUTE FRACTURES.

Martin P. Dommers, M.D.
Electronic Signature
Date Finalized: 03/19/2010

DD: 03/19/2010 DT:03/19/2010

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy Green
SCDC NUMBER: 113832
INSTITUTION: Lee Corr. Inst.
HOUSING UNIT: Darlington S. 1246
WORK ASSIGNMENT: _____

Office Use Only
Grievance No. LeeCI 024612
Code: General 707/3
Policy _____
Disc. Hear. _____
Class. _____
Date Received 1/30/12
IGC Initials AG

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

On the 25th 26th and 27th I spoke to each officer ofc. Street Sgt. [redacted] on the yard about my diet. I have ulcers & different kinds of salami and that other red meat they serve hurts my stomach. I haven't eaten since the first 2 times they serve my stomach is raw and burning. I've written my lawyer concerning this matter. I've written the kitchen as well. ACTION REQUESTED: That officers and kitchen staff be suspended for my suffering without pay.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

I spoke with Sgt. Anderson officer Street. Street call the kitchen. They said that they was not going to send me anything. Timothy Green 1-27-12
Grievant Signature Date

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed for the following reasons. You have not provided a specific date of incident. You alleged that you spoke to each officer on the 25th, 26th and the 27th but you have not provided the month that you allegedly spoke to staff. Your grievance is also being returned due to vagueness. You have not provided the name of the alleged sergeants or officers that you spoke to about your alleged food. Your grievance is also being returned because your informal resolution attempt is insufficient. An informal resolution attempt must be made with the appropriate supervisor. I suggest that you submit a request to staff to A/W Brooks to address your concerns due to the fact the Cafeteria falls under his area of supervision. You have five (5) days to correct and resubmit this grievance by submitting a new grievance form to the grievance office by 02/07/12. If not received by this date, this issue will be closed. Return this form with your corrected grievance for date verification.

R Johnson 1/31/12
IGC Signature Date

Grievant Signature Date

- ☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy Green
SCDC NUMBER: 113830
INSTITUTION: LEE CORRI INST
HOUSING UNIT: DARLINGTON S. 1246
WORK ASSIGNMENT: JAN 30 2012

Office Use Only
Grievance No. Lee CT 0245-12
Code: General ne/chl
Policy _____
Disc. Hear. _____
Class. _____
Date Received 1/31/12
IGC Initials [Signature]

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

I've written
NUMEROUS REQUEST FOR SICK CALL. I HADN'T SEEN
ANYONE YET. MY KNEES AND STOMACH IS KILLING ME.
I'M HAVING PAINS IN MY CHEST AND STOMACH AND
MY KNEES I CAN'T REST AT NIGHT.

ACTION REQUESTED:

THAT I GET THE MEDICAL ATTENTION
THAT'S NEEDED.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

WRITTEN NUMEROUS REQUEST TO MS RABON
AND SICK CALL.

Grievant Signature

Date

[Signature] 1-27-12

ACTION TAKEN BY IGC:

This grievance is being returned to you unprocessed because you have failed to state a specific date of the alleged incident. You have not provided a specific date as to when you submitted numerous request for sick call. Your grievance is also being returned because your informal resolution attempt is insufficient. An informal resolution attempt must be made with the appropriate supervisor. I suggest that you submit a request to staff to Nurse McDonald to address your concerns due to the fact medical falls under her area of supervision. You have five (5) days to correct and resubmit this grievance by submitting a new grievance form to the grievance office by 02/07/12. If not received by this date, this issue will be closed. Return this form with your corrected grievance for date verification.

IGC Signature

Date

[Signature] 1/31/12

Grievant Signature

Date

[Signature] 1/31/12

- ☒ I accept the action taken by the IGC and consider the matter closed.
☐ I do not accept the action taken and wish to appeal.

Request to Staff Member

GRIEVANCE CORR.
OFFICE

1-4-10

Timothy Green

#113830

LEE CORR. INST.

Chesterfield North
Rm #2110

This is a Notice of intent upon this office GRIEVANCE
I have been filing legitimate GRIEVANCES in this office
And Nothings never done about the situation in the Chesterfield
Unit. I'm going to file GRIEVANCES on this office. For not
Complying to the Rules and Regulations of this office
And Post. I've send a letter to INSURE GRIEVANCE BRANCH
Mr. Michelle White at Headquarters.
I'm also sending a letter to SENATOR Ralph Anderson.
And im preparing 1983 civil actions against this office.
And upon the Warden Padula Deputy Warden Bell & Major
Dean, Lt. Richardson, Captain Johnson Deputy Warden
Brinks. For the violation of state and federal rights
And Constitution, As well as civil rights.
This is your Notice upon this office and institution.
Thank you.

State of South Carolina
Court of Appeals

Timothy Green Plaintiff

v.

Motion Attaching Summary
Judgment & Requesting
A New Hearing on the facts.
C.A. No.: 2011 CP-31-0187

Lt Franklin Richardson Jr. & S.C.D.C Medical staff

This Matter comes before this Honorable Court Refuting Summary
judgement in this Civil Action. Plaintiff states that he can
prove deliberate indifference. Plaintiff was beaten by Lt. Franklin
Richardson Jr. severely and placed on lockup in a corner
Room where no one could see him. Plaintiff wrote
Request to the investigator and Bishopville County lock
trying to get him arrested. Plaintiff "eye" right was
closed shot this whole right side of his face was
swollen. Plaintiff tried to get medical attention
the next day from Nurse Jones she wouldn't stop
and talk to him. He tried to talk to nurse
Pratt and he wouldn't talk to him. That same
day of the incident Nurse Cooper told them

LEGAL MAIL ONLY

that beating. It's in medical Record the badly swollen eye
with a cut on it. Deliberate indifference to serious
Medical Needs of prisoners constitutes the unnecessary
and wanton infliction of pain proscribed by the Eighth
Amendment. In order to prevail on a constitutional
claim of inadequate medical care. Nurse Cooper came
up to "S.M.U" lockup because Lt. Richardson Jr. sprayed
gas down my throat. And I told them that this man
sprayed gas down my throat. He always tried to treat
us like we were the lowest thing on this earth. But
I found out that he was a sex stripper. How could I
act out the way they stated when I had just come
off of a hungerstrike. I went without food and water
for 19 days. But they had documents of 12" days. They
said that we had to go 4 days before they could
document it. I lost 60 lbs. And I was too weak
to fight with these people or argue with them.
I lost so much weight that the guys on lockup
didn't recognize who I was. Everybody on this
yard will tell you Lt. Franklin Richardson Jr. assaulted
me.

LEGAL MAIL ONLY

Proof of deliberate indifference may be established by direct or by circumstantial evidence. Some of the types of direct evidence prisoners present sick call requests for medical attention or records reflecting.

1. The dates when medical attention was requested to whom the requests were submitted

the medical conditions complained of the effects of any delay in obtaining access to medical staff.

the dates when access was provided.

Specific Medical staff seen.

Attorney Robert J. Butcher has the pictures of my face, my knees and my bruised ribs. Request that he send you a copy. When he showed

my family the pictures they couldn't believe that an officer of the law could do such a thing.

treatment provided by particular staff. the nature of follow up care ordered and whether it was carried out. Additional information to indicate the adequacy of treatment and complaints and formal grievances filed regarding the inadequate care. See grievances on medical staff.

THE INADEQUATE MEDICAL CARE, WAS THE REQUEST TO JONES
AND PRAITH BOTH NURSE IGNORED PLAINTIFF COMPLAINT ABOUT
WOUNDS HIS EYE RIBS AND KNEES. WHICH ARE STILL BEING
NEGLECTED. PLAINTIFF STILL SUFFERS FROM CHRONIC PAINS. CHECK
MEDICAL FILES. PLAINTIFF'S TOES FEELS LIKE THEY ARE GOING
TO BREAK OFF. MEDICAL PRESCRIBED MEDICINE PLAINTIFF BLOOD
PRESSURE MEDICINE FOR CHRONIC HEADACHES FROM HIS
HEAD BEING SLAMMED ON THE FLOOR. PLAINTIFF DON'T EVEN
HAVE HIGH BLOOD PRESSURE MEDICINE THAT SWELL MY SHOULDER
FEET AND LEGS WITH WATER. AND TOOK MY SIGHT. I THOUGHT
I WAS GOING TO DIE. MY LAWYER I SENT THE MEDICINE
TO HIS OFFICE. THE MAILROOM INVESTIGATOR AND CONSTABLE
AND THE CAPTAIN WENT INSIDE MY LEGAL MAIL TO MY
ATTORNEY. WHICH IS A VIOLATION OF MY CONSTITUTIONAL
RIGHTS ATTORNEY-CLIENT RELATIONS.
AND HE DID NOTHING WHEN I TOLD HIM ABOUT IT.
FROM THE MEDICINE I CAN'T WEAR SHOES ANymore.
FROM THE ASSAULT BY LT. FRANKLIN RICHARDSON SR
I HAVE PAINS IN MY EYE + CHRONIC HEADACHES.
MY RIGHT EYE STILL HAS BLACKNESS AROUND IT.

My KNEES ARE still killing me. And they ARE still swollen.

My STOMACH is killing me. I have two "2" types of Ulcers
Now since he sprayed the gas down my throat.
GASTRO Ulcers and bleeding Ulcers. When FRANKLIN

Richardson Jr. Jumped down in my side with
his KNEE AND started DUCK PLAINIFF in his face.

All the officers ran into the shift office. Only
Officer FARMER picked me up off the floor. My
Vision was blurred from the beating while

I was in handcuffs. I was weighing 146 lbs
down from 210 lbs. I was weak from the
hungerstrike. And in handcuffs what could
I do. My Mouth and stomach was on fire.

I couldn't eat for days afterwards I live
off of milk and bread. Ask SFC. Thompson.

My Lawyer NEVER got depositions from these

Critical witnesses. Estelle v Gamble 429 U.S. 97

103 (1976) West v. Atkins 487 U.S. 42, 57-58 (1988)

Richardson v. McKnight 521 U.S. 399 (1997)

Estelle, 429 U.S. at 104 FARMER v. BRENNAN

511 U.S. 825, 836 (1994) 161

Id At 843 Brady v. Buckett 157 F.3d 1022 (5th Cir.

(1998) Brock v. Wright 315 F.3d 158, 1162 (2nd Cir. 2003)

And 503 U.S. At 10, 109 S.Ct. At 997, 1000 Riley v. Dorton
Riley v. Dorton 115 F.3d 1159, 1168 (4th Cir. 1997)

spraying gas down a prisoners throat is de minimis.

What is deliberate as difference? According to the

Supreme Court, deliberate indifference is a state of

Mind more blameworthy than mere negligence but

less culpable than purposeful misconduct. See Farmer

511 U.S. At 835. Deliberate indifference holds

that a prison official will be held liable under

the Eighth Amendment. Only if he knows that

inmates face a substantial risk of serious harm

And disregards that risk by failing to take

Reasonable measures to abate it. Id. At 847

Under this test, prisoners Alleging Eighth

Amendment violations need not show that a prison

official acted or failed to act believing that

harm actually would befall an inmate, it is enough

that the official acted or failed to act despite his

Knowledge of a substantial risk of serious harm

Id. At 842.

I HAVE WITNESSES THAT WAS THERE AND HEARD NURSE COOPER TELL THE OFFICERS + LT. RICHARDSON JR. TO BRING TO MEDICAL AFTER THE ASSAULT. I CAN BLOW THIS CASE OUT OF THE WATER. AND THAT THEY PUT ME IN A CORNER ROOM TO SLEEP AND REST BEFORE ANYONE KNEW ABOUT THE ASSAULT.

THE EIGHTH AMENDMENT REQUIRES THAT PRISON OFFICIALS PROVIDE A SYSTEM OF READY ACCESS TO ADEQUATE MEDICAL CARE. PRISON OFFICIALS SHOW DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS IF PRISONERS ARE UNABLE TO MAKE THEIR MEDICAL PROBLEMS KNOWN TO THE MEDICAL STAFF OR IF THE STAFF IS NOT COMPETENT TO EXAMINE THE PRISONERS, DIAGNOSE ILLNESSES, AND THEN TREAT OR REFER THE PATIENT. THE PRISON MUST ALSO PROVIDE AN ADEQUATE SYSTEM FOR RESPONDING TO EMERGENCIES. IF OUTSIDE FACILITIES ARE TOO REMOTE OR TOO INACCESSIBLE TO HANDLE EMERGENCIES PROMPTLY AND ADEQUATELY, THEN THE PRISON MUST PROVIDE ADEQUATE FACILITIES AND STAFF TO HANDLE EMERGENCIES WITHIN PRISONS.

SEE IMAGE CARE & GRIEVANCES.

I KNOW THAT I AM SERIOUSLY SICK FROM THE WAY WE WERE BEING FED AND TREATED. ASK SENATOR RALPH ANDERSON.

Clement v. Gomez 298 F.3d 898, 904 (9th Cir 2002)

Green v. Daley 414 F.3d 645, 653 (7th Cir 2005) Brock v.

Wright 315 F.3d 158, 163-64 (2nd Cir 2003) Clement v. Gomez

298 F.3d 898 (9th Cir 2002) Ellis v. Butler 890 F.2d 1801,

1003 (8th Cir 1989). Bouchard v. Magnusson 715 F. Supp. 1146,

1148 (D. Me 1989)

Lt. Richardson stated that I call him an ex-skipper, while in a holding cell 4 feet wide and 4 feet long. Plaintiff only asked him what was he being locked up for? What he didn't realize that I wasn't one of the guys that allowed him to jump on me and wait for get back, knowing how corrupt the Administration is. I had to get a guy down stairs to contact my family and let them know what happened. 6 days later my niece contact Robert Butcher. He came up and took pictures of my wounds. There so many people that's been hurt by him and other officers. Most can't read or write. And they tell the guys that file grievances they are switching and fail for it.

Immunity in "NO" forms can be granted to him on summary judgement because the genuine issues of material fact existed precluding summary judgement, on whether prison guards complied South Carolina's official policy governing use of force when inmate has been restrained and

IN A holding cell. Policy does NOT state that A PRISON OFFICIAL
CAN USE MACE OR GAS WHEN AN INMATE IS RESTRAINED AND BEHIND
DOORS. PLAINTIFF WAS NOT KICKING AND HANGING ON CELL DOOR.
PLAINTIFF STATES THAT HE HAS OFFICIAL WITNESSES THAT HIS LAWYER
WAS TOLD TO GET DEPOSITIONS FROM. PLAIN HAS A EXPERT WITNESS
STATEMENTS AND WITH OFFICERS PRESENT SAYING THAT HE WAS
PUNCHED IN THE EYE REPEATEDLY.

PLAINTIFF STATES THAT HE CAN PROVE COLORFUL PROOF ACERTAIN
PLAINTIFF, WHO ASSERTS MALICIOUS AND SADISTIC USE OF FORCE
NEED NOT SHOW THAT FORCE CAUSED EXTREME DEPRIVATION OR
SERIOUS OR SIGNIFICANT PAIN OR INJURY TO ESTABLISH EIGHTH
AMENDMENT CAUSE OF ACTION. ALL THAT IS NECESSARY IS
PROOF OF MORE THAN DE MINIMIS PAIN OR INJURY.

THIS IS PROOF THROUGH MATERIAL FACTS THE CAUSE OF INJURY
AND THAT LT. FRANKLIN RICHARDSON JR. DID BRUTALLY BEAT
INMATE TIMOTHY COREAS ASK HIM TO TAKE A LIE DETECTOR
TEST THAT HE DIDN'T BEAT PLAINTIFF IN THE FACE. AND
STAM HIS HEAD ON THE FLOOR AND DROP DOWN ON
PLAINTIFF SIDE. AND SPRAY GAS DOWN HIS THROAT AND
IT WASN'T PERSONAL. IF PASS I'LL DROP THIS CASE.

I KNOW JUST AS MOSES STOOD BEFORE THE BURNING

BUSH HE'LL FAIL. WILLIAMS V. BENJAMIN 77 F.3d 756 (14th
CIR. 1996).

There is a genuine issue of material fact is technically
a question of law but its resolution depends on an
assessment of the evidence submitted in support of
the Plaintiff Johnson v Jones U.S. 115 S.Ct 2157, 132
L. ed. 2d. 238 (1995) 115 S.Ct. At 2156-58

It occurs to the fact that Lt. Franklin Richardson Jr. by acting
out his personal feeling because of all the paperwork I
was filing on him. Defendant hasn't enlightened this
Court on the score of what's really going on.
See Grievances and that we were bringing heat on
him and everyone else about the abuse and
racial and unusual punishment that was dealt out
to us. Robert Butcher has the statements.

Scherz v. USA Upaca County, 875 F.2d 578, 583 (7th Cir.
1984). But misuse of official authority for private ends
is a recurrent feature of cases in which a deprivation
of life, liberty, or property without due process
of law is found. Screws v. United States, 325
U.S. 91, 93, 111, 65 S.Ct. 1031, 1032, 1040, 89 L. ed.
1495 (1945) Gibson v City of Chicago 910 F.2d
1510, 1518 (7th Cir 1990).

The distinction is between an act that is justifiable
if considered without regard to the actor's motive

objectively justifiable, is explicable only in terms of the
Actor's Motivation, AS IN A CASE OF POLICE BRUTALITY SO Egregious
that it CAN BE EXPLAINED ONLY BY REFERENCE TO A Racist
OR OTHER IMPROPER MOTIVE FOR THE DEFENDANT OFFICER'S ACTION.
INEFFECTIVE ASSISTANCE OF COUNSEL ATTORNEY MISCONDUCT.
ATTORNEY WAS TOLD TO FILE SUIT AGAINST LT. FRANKLIN
RICHARDSON JR. AND MEDICAL AT LEE COUNTY OR THE
MEDICAL AGENCY. SEE AFFIDAVIT OF RECORDS CUSTODIAN.
PLAINTIFF STATES THAT HIS LAWYER IS A CIVIL ATTORNEY
& COUNSELOR, A PROFESSIONAL IN HIS CRAFT. THERE
NOWAY POSSIBLE THAT ATTORNEY COULD HAVE FILED
SUIT AGAINST THE DEPARTMENT. ATTORNEY VIOLATED
RULE OF PROFESSIONAL CONDUCT. RULES VIOLATED
RULE 407, SCACR; RULE 1.1 failing to provide competent
REPRESENTATION; RULE 1.2 failing to abide by A CLIENT'S
DECISIONS CONCERNING THE OBJECTIVES OF REPRESENTATION
AND failing to CONSULT WITH THE CLIENT AS TO THE
MEANS by which they ARE to be PURSUED; RULE
1.3 failing to ACT WITH REASONABLE DILIGENCE AND
PROMPTNESS WHILE REPRESENTING A CLIENT; RULE 1.4
FAILURE TO KEEP A CLIENT REASONABLY INFORMED
ABOUT THE STATUS OF A MATTER AND failing to

Promptly Comply with Requests for information, Rule 1.7,
Rule 1.8, Rule 2.1 Rule 8.4 (A) 8.4(E).

Plaintiff Attorney should've known that Plaintiff
couldn't see S.C.D.C. BECAUSE Plaintiff told Mr.
Butcher when he went over his federal case
with him. Plaintiff states that he filed into
the Administrative Law Judge div. but never heard
from them. And was told that it was dismiss
because he didn't show where a liberty interest
was involved. Loss of good time visitation, EARN
WORK CREDITS. Check Admin-Law Court Rules.

Plaintiff states that summary judgement should
set aside to allow Plaintiff to present his
case before this honorable court.

Plaintiff states that with certainty that he can
show this Honor Court light within this case.
With solid material evidence. I pray this Honor
Court. I AM.

Smother Deen

In The United States District Court For The District
Of South Carolina

Plaintiff first set of interrogatories
to defendants.

Timothy Green # 113830
✓ Plaintiff

Civil Action No: 9:09-CV-03270
-DCN - BM.

TERRY BRACEY Red Team Major, Deputy Warden, Robin
Warden Anthony Padola, Ass. SMO Bruce Oberman, Grievance Corp.
LATHERINE JAMES, Deputy Warden, Michael Bell, Sgt. FRANKLIN BORDMAN SMO
LAU KIRAZIAN JEWELLER LIVINGSTON; Major JAMES DEAN, SAULIA S. MAW
BRACEY Mall Room, D.H.D. Sharon PATERSON, Sgt. CARL DAVIS SMO.
WARDEN WILIE EGGLETON, Michelle Gibson Property Control, CONTA BAND HT.
JAMES GRAHAM, Lt. PATRICIA A. GRAHAM, GRIEVANCE CORR. LISA JOHNSON,
Major Steven Nolas, GRIEVANCE CORR. Ethel Red Fears, Lt. Franklin
Richardson, GRIEVANCE CORR. SUE H. SKIPPER, defendants

In accordance with Rule 33 of the Federal Rules of Civil Procedure,
Plaintiff Requests that defendants ANSWER the following interrogatories
under oath, and that the answers be signed by the persons making them
and be served on Plaintiff within "30" days of service of these
interrogatories.

If you CANNOT ANSWER the following interrogatories in full After
exercising due diligence to secure the information to do so, so state
and answer to the extent possible.

Specifying your inability to answer the remainder, and stating what-
ever information or knowledge you have concerning the UNANSWERED
portions.

These interrogatories shall be deemed continuing so as to
require supplemental answer as new and different information
materializes. First questions for defendants

1. CONCERNING Plaintiff's legal box questions to Major Terry Bracey,
WARDEN WILIE EGGLETON, Deputy Warden Robin Chavis, Lt. CONTABAND,
JAMES GRAHAM, Property Control Michelle Gibson, SUE H. SKIPPER AND
Ethel Red Fears. Why weren't Plaintiff legal box given to him? When
Herbert McDowell was given back to him the same night?

Strict Proof

2. Why did Warden Wilie EGGLETON AND Deputy Warden Robin Chavis kept
telling Plaintiff that it would be given back to him? And Plaintiff
never received his legal box? Strict Proof.

ARGUMENTS

Lt. Franklin Richardson Jr. state in his incident report that inmate Timothy Green Plaintiff was told by nurse Karen Cooper to come out of the holding cell when he ~~came out~~ came out of the holding cell he charged towards Lt. Richardson spitting on Lt. Richardson on his right arm. Ex. E Now read Nurse Karen Cooper statement. That she remembered vividly and the incident between inmate Green and Lt. Franklin Richardson Jr. "Remember I am in handcuffs". states when I arrived at the SMU holding cell. Inmate Green was acting irrational and yelling within the cell. He was beating his head up against the walls and slamming his body. She stated, I approached the cell and advised him that I wanted to see him in medical. He initially calmed down and agreed to go to the nurses room that was just a few feet away from the holding cell.

LEGAL MAIL

SALUDA UNIT

SEE INCIDENT REPORT OF LT. FRANKLIN RICHARDSON JR. THEY ARE CONFLICTING. LT. FRANKLIN RICHARDSON JR. NEVER SEEN NONE OF THE THINGS NURSE COOPER SEEN. ALSO LT. FRANKLIN RICHARDSON JR. INCIDENT REPORT WAS WRITTEN IN A THIRD PARTY. SOMEONE ELSE WRITTEN IT. LOOK AT LT. RICHARDSON STATEMENT ONE OF THEM IS CLEARLY LYING. INMATE GREEN WAS SPRAYED BEHIND THE DOOR HE COULDN'T HURT ANYONE. THE REASON HE WAS SPRAYED IS BECAUSE HE CALL LT. FRANKLIN RICHARDSON JR AND EX-STRIPPER. ALSO HE HAD NO WITNESSES AT THE DHO HEARING. BEFORE YOU CAN TAKE ANYONE OUT A CELL IN SMU HE MUST BE IN HANDCUFFS WITH ANOTHER OFFICER THERE. ALSO THERE MUST BE A USE OF FORCE REPORT AND A REPORT OF THE USE OF GAS AND AMOUNT.

LEGAL MAIL

SALUDA UNIT

(NURSE COOPER SAID THAT ALL HE DID WAS
THROW HIM TO THE GROUND AND PUT HIS HANDS
BEHIND HIS BACK) "REMEMBER THEY CAN'T TAKE
YOU OUT OF A CELL WITHOUT BEING IN
HANDCUFFS. CLEAR LIES CHECK POLICY SMS.
YOU CAN'T COME OUT OF ANY ROOMS WITHOUT
BEING IN HANDCUFFS. I THINK I HAVE
SHOWN YOU ENOUGH LIES. I KNOW THAT
YOU CAN LOOK AT EXH B KAREN COOPER RN.
STATEMENT AND LT FRANKLIN RICHARDSON JR. EXH. C
STATEMENT AND INCIDENT REPORT EXH. E.
AND SEE THE COVERUP AND LIES.

I CAN PROVE WITHOUT A SHADOW OF
DOUBT THESE ARE LIES. I HAVE FACTS
TO PROVE IT AND WITNESS ALSO. PLEASE
GRANT ME A TRIAL SO I CAN GET
OR RECEIVE JUSTICE.

LEGAL MAIL
SALUDA UNIT

L.L.C. LAW FIRM

Exh. B

No. 2858 P. 2

STATE OF SOUTH CAROLINA
COUNTY OF LEE

Timothy Green,

Plaintiff

v.

South Carolina Department of Corrections,

Defendant

IN THE COURT OF COMMON PLEAS
CASE NO.: 2011-CP-31-0187

AFFIDAVIT OF
KAREN COOPER, RN

James I. Davis
FILED
AUG 2013
Lee County, SC
C.C.P. & G.S.

1. My name is Karen Cooper and I am and a Registered Nurse employed with the South Carolina Department of Corrections. I was employed with Lee Correctional Institution on March 11, 2010 as a Registered Nurse. I Remember this day vividly and the incident between Inmate Green and Lt. Franklin Richardson.
2. Inmate Green had apparently been sprayed with chemical munitions and I was called to SMU to evaluate Inmate Green. When I arrived at the SMU holding cell, Inmate Green was acting irrational and yelling within the cell. He was beating his head up against the walls and slamming his body.
3. I approached the cell and advised him that I wanted to see him in Medical. He initially calmed down and agreed to go to the Nurses' Room that was just a few feet from the holding cell.
4. The holding cell door was open and inmate Green was taken to the Nurses' Room. At that time, he started acting erratically in the Nurses' Room. He started slamming the computer monitor and throwing himself around the room. I became concerned for my safety and started moving towards the bathroom to protect myself.
5. At the time Inmate Green was acting erratically, Lt. Richardson approached the Nurses' Station. I saw Inmate Green spit at Lt. Richardson and charge him. Inmate Green was completely out of control at the time that he began to charge Lt. Richardson.

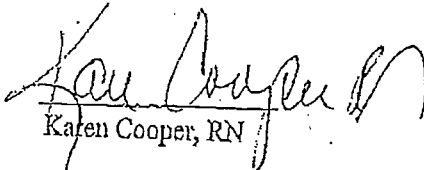
Jun. 26. 2013 2:28PM Lee Law Firm

No. 2858 P. 3

6. When inmate Green charged Lt. Richardson, he took the inmate down. All he did was throw him to the ground and put his arm behind his back. I witnessed the entire incident and did not see Lt. Richardson ever strike inmate Green with his fist or kick him. That did not happen.
7. Following the incident, inmate Green was placed in handcuffs and taken back to the holding cell.

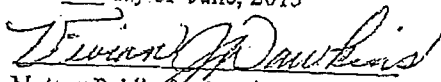
FURTHER THE DEPONENT SAYETH NOT:

DATED this 27 day of June, 2013.


Katen Cooper, RN

SWORN to and subscribed before me

this 27 day of June, 2013



Notary Public for South Carolina

My Commission Expires: April 22, 2023

Exh. C

STATE OF SOUTH CAROLINA
COUNTY OF LEE

Timothy Green,

Plaintiff

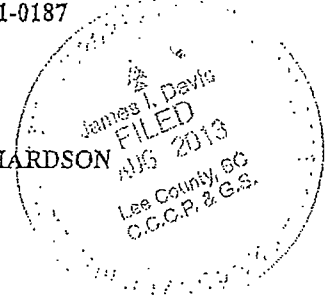
v.

South Carolina Department of Corrections,
Defendant

IN THE COURT OF COMMON PLEAS

CASE NO.: 2011-CP-31-0187

AFFIDAVIT OF
LT. FRANKLIN RICHARDSON



1. My name is Franklin Richardson and I was a Lieutenant employed by the South Carolina Department of Corrections at Lee Correctional Institution on March 11, 2010.
2. Inmate Timothy Green was taken to SMU after passing out food trays. Inmate Green began cursing and threatening me. He was taken to the Special Management Unit at Lee Correctional Institution for this conduct.
3. Prior to being placed in SMU, he was placed in the "boss chair" to be searched for contraband. A walkman was found in his underpants.
4. He was then placed in a holding cell where he again started yelling, cursing and threatening me. He was told to cease his behavior to which he refused. I then administered a short burst of Top Cop MK-9 gas into the holding cell. This caused the Plaintiff to cease his behavior.
5. I then called a nurse to assist Inmate Green in cleaning the chemical munitions and evaluating him. Nurse Karen Cooper came to evaluate the Plaintiff.
6. At that time, he was led out of the holding cell to get into the Nurses' Station. This was a few feet away. He again became agitated when he reached the Nurses' Station and he lunged towards me and spit on my right arm and at that time, I took him to the ground and placed his arm behind his back while he was going down, Inmate Green hit his eye

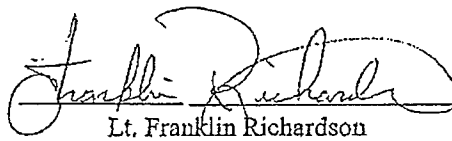
on a nearby wall. Inmate Green's right eye and the area near his right eye were injured when he fell. Inmate Green was charged accordingly.

7. I never hit Inmate Timothy Green or kicked him. That is completely fabricated by Inmate Green.

8. Inmate Green was convicted of threatening to inflict harm/assault on employee as a result of this incident.

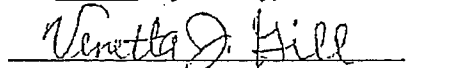
FURTHER THE DEPONENT SAYETH NOT:

DATED this 16th day of July, 2013.


Lt. Franklin Richardson

SWORN to and subscribed before me

this 16th day of July, 2013


Notary Public for South Carolina
My Commission Expires: 3/29/2016

WARDEN RECORD 052

Exh. E
SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INCIDENT REPORT

MAR 12 2010
Actn. As...
File Page... of...
Prepare for Warden...
File Number...

Institution / Center: Lee CI 10-03-155
Date of Report: 3/11/10
Reporting Official: Lt. F. Richardson Time of Report: Approx 4:55 PM
Location of Incident: SMU C Area Date of Incident: 3/11/10
Inmate(s)/Resident: SCDC# Age Race Sex Employee(s) Involved:
1. Timothy Green 113830 B/M 1.
2. 2.
3. 3.
4. 4.
5. 5.

On the above date and approximate time:

I Lt. F. Richardson while on duty after bringing Tim Green from Chesterfield. Tim Green was in the Bass Chair. The Chair alerted on Tim Green after striking him down a walk man was found inside his underwear. After placing Tim Green in the holding cell he started using vulgar language and being disrespectful he was given directives to stop his behavior. At that time Lt. Richardson administered Taser Mk-9 chemical munition into the holding cell Tim then stopped his behavior. Medical was call Nurse Karen Cooper to check Tim Green. Nurse Cooper gave the order for Tim Green to come out of the holding cell. When Tim Green came out he charge towards Lt. Richardson spitting on Lt Richardson on his right arm. Lt. Richardson pushed Tim Green away Tim Green went to the floor hitting his head on the wall Tim Green is being charged with 825 Refusing 801 assault.

Signature: [Signature]

Evidence:

Witness(es):

Supervisor's Comments: Tim Green # 113830 is charged with 825 Refer to DHD

Signature: S. Gentle Title: Lt Date/Time: 3-11-10 5:14 PM

Major / Responsible Authority:

Refer to DHD 807, 825, 817

Signature: Wanda Bill Title: AW

SCDC19-29A (Rev. February 2004)

Date: 3/12/10

STG Related - Refer to STG Committee
() Yes (☒) No () Unknown

This Incident is DRUG related
() Yes (☒) No () Unknown

Action Taken

() Informal Resolution
() Administrative Resolution
(☒) Refer to Disciplinary Hearing

IN THE UNITED STATES DISTRICT COURT FOR
THE STATE OF SOUTH CAROLINA

Timothy Green, # 11380,

Civil Action #: 6:14-cv-02595-MGL-KFM

Plaintiff,

v.

Lt. Franklin Richardson, Jr.;
Nurse Pratt; Nurse Practitioner
Rabon; Nurse Franklin; Nurse
Moody; Nurse Karen Cooper;
Officer Thompson SMU; Sgt Price;
Officer Cain; Lieutenant Jenkins;
Officer Farmer; Officer Mickens;
Sgt. Demayrie; and Nurse Jones,

Defendants.

MOTION FOR SUMMARY JUDGMENT

TO: TIMOTHY GREEN, *PRO SE* DEFENDANT:

YOU WILL PLEASE TAKE NOTICE that the Defendants, by and through counsel, will move before this Honorable Court at 10:00 a.m. on the tenth day following service of this Motion upon you, or at such other time and place as may be set by the Court, for an Order of Summary Judgment in favor of these Defendants pursuant to Rule 56 of the Federal Rules of Civil Procedure on the ground that there is no issue as to any material fact and that these Defendants are entitled to summary judgment in their favor as a matter of law; or in the alternative, for dismissal based on other grounds as set forth in the attached Memorandum.

This Motion will be based on the Memorandum, Affidavits, and Exhibits attached hereto

and filed contemporaneously herewith.

Pursuant to local rule 7.02 of the South Carolina District Court Rules, counsel hereby certifies that the plaintiff is a *pro se* litigant; this is a motion to dismiss and consultation with the plaintiff is not required.

RESPECTFULLY SUBMITTED,

LEE, ERTER, WILSON, HOLLER & SMITH, LLC

By: s/G. Murrell Smith, Jr.
G. MURRELL SMITH, JR.
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January 21, 2015

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Timothy Green,

Civil Action #: 6:14-cv-2595-MGL-KFM

Plaintiff,

vs.

Lt. Franklin Richardson, Jr.; Nurse Pratt;
Nurse Practitioner Rabon; Nurse Franklin;
Nurse Moody; Nurse Karen Cooper; Officer
Thompson, SMU; Sgt. Price; Officer Cain;
Lt. Jenkins; Officer Farmer; Officer Mickens;
Sgt. Demayrie; and Nurse Jones

MEMORANDUM IN SUPPORT OF SUMMARY JUDGMENT

Defendants submit the following in support of their Motion for Summary Judgment.

Plaintiff asserts “on or about the 3/19/10, I was in the Chesterfield Unit trying to change the conditions we were in at Lee Correctional Institute.” [ECF-1, p. 3]. Plaintiff asserts he went on a hunger strike for “19 days no food and water.” [ECF-1, p. 4]. Plaintiff asserts “that’s the day Lt. Richardson, Jr., came on the Rock ... he saw me standing in the doorway tell him to serve the food.” [ECF-1, p. 4]. Plaintiff asserts “he came running up the stairs and ... I knew he was going spray the gas.” *id.* Plaintiff asserts Lt. Richardson “didn’t know what to do. He told me to pack my stuff and I was going to lockup.” *id.* Plaintiff asserts Richardson “put me in handcuffs.” *id.* Plaintiff asserts “I asked to speak to the investigator.” Plaintiff asserts he placed a radio in his pants because he was concerned it would be stolen while he was in lockup. [ECF-1, p. 5]. Plaintiff asserts that while he was “talking to (Richardson) bending down into the flap on the locked door, he sprayed gas... into my mouth.” [ECF-1, p. 5]. Plaintiff asserts “lots of it went

down my throat into my stomach and my mouth and throat and stomach was on fire.” [ECF-1, p. 5].

Plaintiff asserts “the gas and liquid from my stomach burning came and I spit it out.” [ECF-1, p. 5]. Plaintiff asserts “Lt. Richardson rushed me and pick up slamming me to the floor.” [ECF-1, p. 5]. Plaintiff claims “the gas put blisters on my tongue and in my throat.” [ECF-1, p. 6]. Plaintiff asserts he retained “this lawyer Robert Butcher” who “took picture of my face, eye, ribs, and knees.” [ECF-1, p. 6]. Plaintiff asserts “I need orthopaedic shoes now... I need surgery on my knees and feet” and “I have migraine headaches.” [ECF-1, p. 6]. Plaintiff also asserts “they gave me the wrong medicine high blood pressure medicine” and “I had water in my feet, arms, legs, shoulders and lost my vision and kept passing out.” [ECF-1, p. 6].

Plaintiff asserts “that he was brutally assaulted by Lt. Franklin Richardson, Jr., and the officers and medical attempted to hide or cover up the excessive force and assault by spraying of gas down plaintiff’s throat. This assault happened while plaintiff was in handcuffs.” [ECF-1, p. 9].

Plaintiff asks “this Honorable Court to clean this element up here.” [ECF-1, p. 10]. Plaintiff seeks “5 Million compensatory damages, 5 Million punitive damages.” Plaintiff asserts he suffered “mental and emotional injury and physical injury.” [ECF-1, p. 10]. Plaintiff asserts “this guy tried to seriously hurt me.” “Also, I want my right eye fixed, I want my throat and tongue stomach fixed from the gas that burned my mouth, throat and stomach.” [ECF-1, p. 10]. Plaintiff asserts “I still haven’t gotten my vision back where it was before the beating.” [ECF-1, p. 10]. Plaintiff asserts “I know that I am dying from the beating and the medicine that they were giving me.” [ECF-1, p. 10].

Plaintiff asserts he was given “blood pressure medicine and some other medicine the nurse didn’t know about.” [ECF-1, p. 11]. Plaintiff asserts “it was swelling me up in the feet, arms and shoulders. It was taking my vision. I couldn’t see for about 3 hours.” [ECF-1, p. 11]. “But before I was trying to get to medical. I fell out throwing up. I could walk. My feet swelled up on me. My head was about to bust. My feet was so big I couldn’t wear shoes. My ankles, shoulders and elbows were full of some type of water.” [ECF-1, p. 11]. Plaintiff asserts the letter he sent to his lawyer was not mailed. [ECF-1, p. 11]. Plaintiff asserts “my toes feel like they are frozen hard. My feet are swollen. [ECF-1, p. 12]. Plaintiff asserts “Lt. Franklin Richardson, Jr., really hurt me bad.” [ECF-1, p. 12]. Plaintiff asserts “my rights have been violated. I will research this because I think is criminal or a criminal offense.” [ECF-1, p. 13].

PRIOR LITIGATION

On August 2, 2011, Attorney Robert J. Butcher filed an action entitled “Timothy Green vs. South Carolina Department of Corrections”, Docket No. 2011-CP-31-187, in the Lee County Court of Common Pleas. (Exhibit A). In the state court action, Plaintiff asserted Franklin Richardson assaulted him on March 11, 2010. (Exhibit A, p. 5, ¶12). In the state court action, Defendant SCDC filed Affidavits of Karen Cooper, RN, (Exhibit B) and Lt. Franklin Richardson (Exhibit C). On February 28, 2014, the state court action was dismissed by summary judgment (Exhibit D). Plaintiff appealed that action which is currently pending before the South Carolina Court of Appeals.

Plaintiff acknowledges the state court action was dismissed at summary judgment and that dismissal with prejudice is on appeal. [ECF-1, p. 1].

Plaintiff's encounter actually occurred on March 11, 2010 according to SCDOR records and Plaintiff's own grievances. See Affidavits of Karen Cooper (Exhibit B) and Lt. Franklin Richardson (Exhibit C). During a routine search, contraband (a Walkman) was found in Plaintiff's pants. See Incident Report of Richardson (Exhibit E). Plaintiff became non-compliant and threatening. After he failed to cease his behavior, pepper spray was administered to gain control of Plaintiff. *Id.* When a nurse came to evaluate Plaintiff, he again became non-compliant, lunged toward Lt. Richardson and spat upon him. *Id.* He was subsequently taken to the ground and restrained. *Id.*

Plaintiff was convicted of threatening an employee, striking an employee, refusing or failing to obey orders, and possession of contraband on March 23, 2010. See Disciplinary Report and Hearing Records (two reports) (Exhibit F). Plaintiff did not appeal his administrative conviction.

Plaintiff was evaluated and treated after the March 11, 2010 encounter. See Medical Records (Exhibit G). Plaintiff's subsequent medical encounters through February 14, 2014 (the date of the state court dismissal) have also been included.

Plaintiff's claims before February 28, 2014 barred by *Res Judicata* and Collateral Estoppel

Res judicata bars litigation of all claims or defenses that were available to the parties in the previous litigation, regardless of whether they were asserted or determined in the prior proceeding. See *Brown v. Felsen*, 442 U.S. 127, 131, 99 S.Ct. 2205, 60 L.Ed.2d 767 (1979) ("Res judicata thus encourages reliance on judicial decisions, bars vexatious litigation, and frees the courts to resolve other disputes."), and *Meekins v. United Transp. Union*, 946 F.2d 1054, 1057 (4th Cir. 1991) ("The preclusive affect of a prior judgment extends beyond claims or defenses actually presented in previous litigation, for '[n]ot only does res judicata bar claims that

were raised and fully litigated, it prevents litigation of all grounds for, or defenses to, recovery that were previously available to the parties, regardless of whether they were asserted or determined in the prior proceeding.' ”). The elements required for res judicata to apply are: “(1) a judgment on the merits in a prior suit resolving (2) claims by the same parties or their privies, and (3) a subsequent suit based on the same cause of action.” *Coyne & Delany Co. v. Selman*, 98 F.3d 1457, 1473 (4th Cir. 1996). “Generally, claims are part of the same cause of action when they arise out of the same transaction or series of transactions ... or the same core of operative facts.” *In re Varat Enters., Inc.*, 81 F.3d 1310, 1316 (4th Cir. 1996) (internal citations omitted).

To the extent Plaintiff's claims pre-date the judgment of his prior case, they are barred. While he makes claims for slightly different reasons now, he had the opportunity to seek such relief in the prior state court action. These issues were decided adversely to Plaintiff. Plaintiff may not now collaterally attack the outcome of the state court claims. As such, the doctrine of *res judicata* bars the plaintiff's claims prior to February 28, 2014, the date on which the state court action decided. See *Long v. Ozmint*, 558 F.Supp.2d 624, 629 (D.S.C. 2008) (“The District Court clearly had the right to take notice of its own files and records and it had no duty to grind the same corn a second time. Once was sufficient.' ”).

Collateral estoppel, or issue preclusion, provides that once a court of competent jurisdiction actually and necessarily determines an issue, that determination remains conclusive in subsequent suits, based on a different cause of action but involving the same parties, or privies, to the previous litigation. *Boston v. Stobbe*, 586 F. Supp. 2d 574 (D.S.C. 2008); *Weinberger v. Tucker*, 510 F. 3d 486, 491 (4th Cir. 2007)(citing *Montana v. United States*, 440 U.S. 147, 153, 99 S.Ct. 970, 59 L.Ed.2d 210 (1979)). The issues in this case, arising from the same occurrence, have already been litigated in state court and therefore this action should be

dismissed.

Plaintiff here cannot split his causes of action and bring multiple suits against based upon a single set of facts. “Res judicata bars not only issues litigated in a prior action, but issues that could have been litigated.” *Plum Creek Development Co., Inc. v. City of Conway*, 328 S.C. 347, 491 S.E.2d 692 (Ct. App. 1997). The fact [Plaintiff] did not seek to recover all of the relief to which it was entitled in the [first action] does not preclude the bar of res judicata.” *Id.* citing *Nunnery v. Brantley Construction Co., Inc.*, 289 S.C. 203, 210, 345 S.E.2d 740, 743 (Ct. App. 1986); see also *Foran v. USAA Cas. Ins. Co.*, 311 S.C. 189, 427 S.E.2d 918 (Ct. App. 1993)(res judicata barred second cause of action because the rights asserted in the second cause of action existed when the judgment was entered in the first action). Moreover, although Rule 42(b), SCRCp, provides that once a cause of action has been pled, the court may order separate trials of multiple issues under certain circumstances, a party may not of his own volition split his cause of action so as to make it the subject of several causes of action without the consent of the opposing party. *Nunnery*, 289 S.C. at 209, 345 S.E.2d at 743;” *Id.*

Statute of Limitations

Plaintiff's claims are time barred by the 3 year statute of limitations. 42 U.S.C. § 1983. Plaintiff asserts a violation of civil liberties, gross neglect and negligence, assault and battery, deliberate indifference, cruel and unusual punishment, and excessive force. All of these claims must be asserted within three years. Plaintiff's alleged injury occurred on March 11, 2010. Plaintiff initiated this action on May 7, 2014. Plaintiff's claims are time barred and should be dismissed.

Exhaustion of Administrative Remedies

Plaintiff has not exhausted his administrative remedies and his claim is barred under Section 1997e(a) of the Prison Litigation Reform Act which provides: “no action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted.” See *Jones v. Bock*, 549 U.S. 199, 211, 127 S.Ct. 910, 166 L.Ed.2d 798 (2007) (“There is no question that exhaustion is mandatory under the PLRA and that unexhausted claims cannot be brought in court”). “[T]he PLRA's exhaustion requirement is mandatory,” *Anderson v. XYZ Corr. Health Servs., Inc.*, 407 F.3d 674, 677 (4th Cir. 2005), and “applies to all inmate suits about prison life, whether they involve general circumstances or particular episodes, and whether they allege excessive force or some other wrong.” *Porter v. Nussle*, 534 U.S. 516, 532, 122 S.Ct. 983, 152 L.Ed.2d 12 (2002).

The PLRA requires “proper exhaustion” of available administrative remedies prior to filing suit. *Woodford v. Ngo*, 548 U.S. 81, 93–94, 126 S.Ct. 2378, 165 L.Ed.2d 368 (2006). As the Supreme Court has noted, “[a]ggrieved parties may prefer not to exhaust administrative remedies for a variety of reasons,” whether it be concerns about efficiency or “bad faith.” *Id.* at 89–90. This is especially true in a prison context. *Id.* at 90 n. 1. Nevertheless, “[p]roper exhaustion demands compliance with an agency's deadlines and other critical procedural rules because no adjudicative system can function effectively without imposing some orderly structure on the course of its proceedings.” *Id.* at 90–91.

Defendants respectfully request that the court take judicial notice of the SCDC grievance process, specifically, SCDC Policy GA–01.12. See *Malik v. Ward*, 8:08–cv–1886–RBH, 2010 WL 936777, at n. 4 (D.S.C. Mar.16, 2010). The policy is summarized as follows:

After an unsuccessful attempt at informal resolution of the problem(s) by submission of a Request to Staff Member Form or by discussion of the complaint with the appropriate supervisor/staff, (1) an inmate must fill out a Form 10-5, Step 1, and give the form to an employee designated by the Warden (not the Inmate Grievance Coordinator) within fifteen days of the alleged incident; (2) the grievance must then be numbered and entered into SCDC's automated system within ten working days, and the Institutional Inmate Grievance Coordinator (IGC) notified; (3) the IGC must then, within ten working days, finalize the grievance in the system and attempt to informally resolve the issue; if the problem cannot be resolved informally, the IGC will conduct a complete investigation and make recommendations for disposition of the matter to the Warden; (4) the Warden must respond to the inmate, in writing, within forty days from the date the grievance was formally entered into the system by the IGC, then the IGC has five working days to serve the Step 1 response to the inmate; (5) the inmate may then appeal the Warden's response to the Division Director of Operations by completing a Form 10-5a, Step 2, and submitting it to the IGC within five "calendar days" of the inmate's receipt of the response; (6) the IGC then notifies the Inmate Grievance Branch of the Step 2 appeal within another five "calendar days" and the Branch must present the Step 2 appeal to the responsible SCDC official, i.e. the Division Director of Operations, for a response; (7) the Division Director of Operations then has sixty days from the date the appeal was received by the IGC at the institution to respond to the Step 2 grievance, and finally, (8) the IGC has five days to serve the inmate with the Step 2 response.

McFadden v. Reynolds, C.A. No. 3:13-439-JMC-JRM, 2013 WL 1838656, at n. 2 (D.S.C. April 11, 2013) (citing SCDC, Inmate Grievance System, GA-01.12, § 13.4 (Oct. 1, 2010)), adopted by 2013 WL 1838644 (D.S.C. May 1, 2013).

Plaintiff filed grievance Lee CI #0754-10 on March 15, 2010. See Step 1 grievance (Exhibit H, p. 1). Plaintiff filed a duplicate Step 1 grievance on March 19, 2010. See Step 1 grievance (Exhibit H, p. 2). Following a hearing on March 23, 2010, Plaintiff filed a Step 1 grievance on March 24, 2010. See Step 1 grievance (Exhibit H, p. 3). After the grievance was returned to him, Plaintiff failed to resubmit the grievance within five (5) days and therefore abandoned his appeal. Plaintiff has failed to exhaust his administrative remedies and this action should be dismissed under the PRLA.

Deliberate Indifference to Medical Needs

Plaintiff's claims also fail on the merits. Plaintiff alleges that the defendants were deliberately indifferent to his serious medical needs. Although the Constitution does require that prisoners be provided with a certain minimum level of medical treatment, it does not guarantee to a prisoner the treatment of his choice.” *Jackson v. Fair*, 846 F.2d 811, 817 (1st Cir. 1988). The government is “obligat[ed] to provide medical care for those whom it is punishing by incarceration.” *Estelle v. Gamble*, 429 U.S. 97, 102 (1976). This obligation arises from an inmate's complete dependency upon prison medical staff to provide essential medical services. *Id.* The duty to attend to prisoners' medical needs, however, does not presuppose “that every claim by a prisoner that he has not received adequate medical treatment states a violation of the Eighth Amendment.” *Id.* at 105. Instead, it is only when prison officials have exhibited “deliberate indifference” to a prisoner's “serious medical needs” that the Eighth Amendment is offended. *Id.* at 104. As such, “an inadvertent failure to provide adequate medical care” will not comprise an Eighth Amendment breach. *Id.* at 105–106.

In order to state a claim, “[a] plaintiff must satisfy two elements ...: he must show a serious medical need and he must prove the defendant's purposeful indifference thereto.” *Sires v. Berman*, 834 F.2d 9, 12 (1st Cir. 1987). With regard to the objective component, a medical need is “serious” if “it is diagnosed by a physician as mandating treatment or one that is so obvious that even a lay person would recognize the necessity for a doctor's attention.” *Gaudreault v. Municipality of Salem, Mass.*, 923 F.2d 203, 208 (1st Cir. 1990). “Plaintiffs must also show the subjective component-deliberate indifference. An officer is deliberately indifferent only when he ‘knows of and disregards’ the risk posed by the serious medical needs of the inmate.” *Iko v. Shreve*, 535 F.3d 225, 241 (4th Cir. 2008) (citing *Farmer v. Brennan*, 511 U.S. 825, 837, 114

S.Ct. 1970, 128 L.Ed.2d 811 (1994)). Mere negligence or malpractice does not violate the Eighth Amendment. *Grayson v. Peed*, 195 F.3d 692, 695 (4th Cir. 1999). Moreover, disagreements between an inmate and a physician over the inmate's proper medical care do not state a Section 1983 claim unless exceptional circumstances are alleged. *Wright v. Collins*, 766 F.2d 841, 849 (4th Cir. 1985).

In determining whether a prison official is deliberately indifferent to a prisoner's serious medical needs, the court may generally rely on medical records concerning examination and treatment of the prisoner. *Bennett v. Reed*, 534 F.Supp. 83, 87 (E.D.N.C.1981). *Dulany v. Carnahan*, 132 F.3d 1234, 1240 (8th Cir. 1997) ("In the face of medical records indicating that treatment was provided and physician affidavits indicating that the care provided was adequate, an inmate cannot create a question of fact by merely stating that she did not feel she received adequate treatment.").

Nurse Pratt, Nurse Practitioner Rabon, Nurse Franklin, Nurse Moody, Nurse Karen Cooper, and Nurse Jones cannot be held responsible here for the actions of other medical personnel involved in the plaintiff's treatment. See *Polk Cnty. v. Dodson*, 454 U.S. 312, 325, 102 S.Ct. 445, 70 L.Ed.2d 509 (1981) ("Section 1983 will not support a claim based on a respondeat superior theory of liability.") (citing *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658, 694, 98 S.Ct. 2018, 56 L.Ed.2d 611 (1978)); and *Vinnedge v. Gibbs*, 550 F.2d 926, 927-29 (4th Cir. 1977). "Each Government official, his or her title notwithstanding, is only liable for his or her own misconduct." See *Ashcroft v. Iqbal*, 556 U.S. 662, 677, 129 S.Ct. 1937, 173 L.Ed.2d 868 (2009) (rejecting an argument that government officials can be held liable because they merely had knowledge of or acquiesced in a subordinate's misconduct). Plaintiff must establish three elements to hold a supervisor liable for a constitutional injury inflicted by a subordinate: (1) the

supervisor had actual or constructive knowledge that a subordinate was engaged in conduct that posed “a pervasive and unreasonable risk” of constitutional injury to people like the plaintiff; (2) the supervisor's response was so inadequate as to constitute deliberate indifference or tacit authorization of the subordinate's conduct; and (3) there is an “affirmative causal link” between the supervisor's inaction and the plaintiff's constitutional injury. *Shaw v. Stroud*, 13 F.3d 791, 799 (4th Cir.1994). Here, Plaintiff has not alleged facts that would impose supervisory liability on the medical defendants.

Based upon the foregoing, Defendants submit that summary judgment should be granted on Plaintiff's claim for deliberate indifference to his serious medical needs.

Qualified Immunity

Qualified immunity protects government officials performing discretionary functions from civil damage suits as long as the conduct in question does not “violate clearly established rights of which a reasonable person would have known.” *Harlow v. Fitzgerald*, 457 U.S. 800, 818, 102 S.Ct. 2727, 73 L.Ed.2d 396 (1982). Thus, qualified immunity is lost if an official violates a constitutional or statutory right of a plaintiff that was clearly established at the time of the alleged violation such that an objectively reasonable official in the official's position would have known of the right. *Id.*

To determine whether qualified immunity applies, a district court must determine whether a plaintiff has alleged the deprivation of an actual constitutional right at all and whether the particular right was clearly established at the time of the alleged violation. See *Tolan v. Cotton*, —U.S. —, —, 134 S.Ct. 1861, 1865, 188 L.Ed.2d 895 (2014) (*per curiam*); and *Wilson v. Layne*, 526 U.S. 603, 609, 119 S.Ct. 1692, 143 L.Ed.2d 818 (1999). “The judges of the district courts and the courts of appeals should be permitted to exercise their sound discretion in deciding

which of the two prongs of the qualified immunity analysis should be addressed first in light of the circumstances in the particular case at hand.” *Pearson v. Callahan*, 555 U.S. 223, 236, 129 S.Ct. 808, 172 L.Ed.2d 565 (2009). Here, as discussed above, the evidence indicates that the named medical defendants were not deliberately indifferent to Plaintiff’s serious medical needs.

As a result, there was no deprivation of a constitutional right in the above-captioned case.

Defendants respectfully submit that all Defendants are entitled to qualified immunity. See

Carroll v. Carman, — U.S. —, — — —, 135 S.Ct. 348, 349–52, — L.Ed.2d —, — — — (2014) (*per curiam*); and *Tolan v. Cotton*, 134 S.Ct. at 1865.

Conclusion

For the foregoing reasons, Defendants respectfully submit that summary judgment should be granted for all causes of action, and the complaint be dismissed.

Respectfully submitted,

LEE, ERTER, WILSON,
HOLLER & SMITH, L.L.C.

s/G. Murrell Smith, Jr.

G. Murrell Smith, Jr.

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ATTORNEY FOR DEFENDANTS

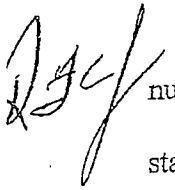
III. THE PLAINTIFF'S CAUSE OF ACTION REGARDING HIS ALLEGATIONS OF INADEQUATE MEDICAL TREATMENT OR MEDICAL MALPRACTICE BY AGENTS OF SCDC MUST BE DISMISSED AS THE PLAINTIFF HAS FAILED TO IDENTIFY AN EXPERT ON THE STANDARD OF CARE OR ITS BREACH BY THE DEFENDANT.

According to Rule 56(e) of the South Carolina Rules of Civil Procedure, in responding to a Motion for Summary Judgment, a Plaintiff may not "rest upon the mere allegations or denials of his pleadings, but his response ... must set forth specific facts showing that there is a genuine issue for trial." The South Carolina Court of Appeals has further stated that "[t]he party seeking summary judgment has the initial responsibility of demonstrating the absence of a genuine issue of material fact ... [t]his initial responsibility 'may be discharged by showing - that is, pointing out to the [in trial] court - that there is an absence of evidence to support the non-moving party's case.'" Richardson v. State - Record, Co., Inc., 330 S.C. 562, 566, 499 S.E.2d 822, 824 (Ct. App. 1998) (quoting Celotex Corp. v. Catrett, 477 U.S. 317 (1986)).

In order to satisfy the burden of truth in a medical malpractice case, the South Carolina Supreme Court has previously held:

The plaintiff uses expert testimony to establish both the required standard of care and the defendant's failure to conform to that standard, unless the subject matter lies within the ambit of common knowledge and experience, so that no special learning is needed to evaluate the conduct of the defendant.

Pederson v. Gould, 288 S.C. 141, 142, 341 S.E.2d 633, 634 (1986); see also David v. McLeod Regional Medical Center, 367 S.C. 242, 248, 626 S.E.2d 1, 4 (2006).

 The principle that experts are generally required in medical malpractice has been affirmed numerous times by South Carolina courts. Additionally, the Court of Appeals clarified the issue, stating "on a defendant's motion for summary judgment, there will usually be no genuine issue of material fact unless the plaintiff presents expert testimony on a standard of care and its breach by the defendant." Jernigan v. King, 312 S.C. 331, 334, 440 S.E.2d 379, 381 (Ct. App. 1993). This

is in accord with the Supreme Court's view that in South Carolina, "medical malpractice actions require a greater showing than generic allegations and conjecture." David, 367 S.C. at 249, 626 S.E.2d at 4. Thus, "summary judgment is completely appropriate when a properly supported motion sets forth facts that remain undisputed or are contested in a deficient manner." Id., 367 S.C. at 250, 626 S.E.2d at 5.

Additionally, attached medical notes show Plaintiff was provided numerous medical examinations and medical attention almost weekly. Plaintiff alleges he was not provided with adequate medical care, yet these notes serve to show Plaintiff has had ample consultations and services. Id. Plaintiff cannot simply allege in a conclusory fashion that he did not receive adequate medical care or attention, provide no supporting evidence, and expect to survive summary judgment. Papasan v. Allain, 478 U.S. 265, 286, 106 S.Ct. 2932 (1986) (courts need not assume the truth of legal conclusions couched as factual allegations)).

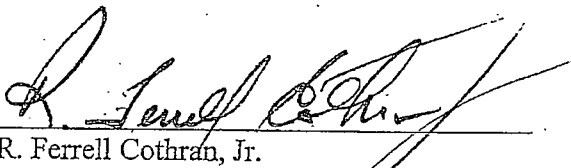
Rather, Plaintiff's complaint is that medical personnel refused to provide him with the care and treatment he personally desired. Such allegations are not sufficient to allow this lawsuit to proceed. Wright v. Collins, 766 F.2d 841, 849 (4th Cir. 1985) (Disagreements between an inmate and a physician over the inmate's proper medical care do not state a claim absent exceptional circumstances.)). Plaintiff's personal opinion notwithstanding, nothing in the evidence and exhibits before the Court give rise to a genuine issue of fact as to whether anyone was deliberately indifferent to Plaintiff's serious medical needs. See Scheckells v. Goord, 423 F. Supp.2d 342, 348 (S.D.N.Y. 2006) (citing O'Connor v. Pierson, 426 F.3d 187, 202 (2d Cir. 2005) ("Lay people are not qualified to determine...medical fitness, whether physical or mental; that is what...medical experts are for.")). While Plaintiff may not agree with the extent and nature of the medical care he received, he cannot simply allege in a conclusory fashion that he did not receive adequate medical care or attention, otherwise provide no supporting evidence

other than his own subjective opinion, and expect to survive summary judgment, particularly when the Defendant has submitted documents and evidence from a medical professional which refutes his claims. See House v. New Castle County, 824 F.Supp. 477, 485 (D.Md. 1993).

Given the Plaintiff's failure to identify an expert in support of his allegations in this case, as well as failing to provide an affidavit setting forth how the Defendants' breach of care was compromised, Defendants request that the Court dismiss any and all causes of action relating to inadequate medical care or medical malpractice.

Therefore, it is the Ruling of the Court that all Causes of Action alleged as to the South Carolina Department of Corrections are hereby Dismissed With Prejudice and the Defendant's Motion for Summary Judgment is **GRANTED**.

AND IT IS SO ORDERED.


R. Ferrell Cothran, Jr.
Judge of the Court of Common Pleas

At Chambers.

2-24, 2014.

Manning, South Carolina.

Exh. FSOUTH CAROLINA DEPARTMENT OF CORRECTIONS
DISCIPLINARY REPORT AND HEARING RECORDCase#: 71 Inmate Name: Timothy Green SCD #: 113830
Living Area: SMJ 167 Job: N/A Custody: ST3Offense Date: 03/11/10 Offense Time: 2:00pm AM/PM Institution: LeeCI - Chesterfield North Cell 2110
809 - Threatening to Inflict Harm on/Assaulting an Employee and/or Members of the Public: Communications,
Verbal or written, by an inmate to an individual that s/he intends to injure that person or commit a violent
or unlawful act dangerous to human life, presently or in the future; or one who commits a physical act of
a threatening nature, and the probable result of such threats or action is to place the individual in fear
of bodily injury; or one who causes evacuation of a building; or one who creates serious disruption or alarm.
Any unauthorized body contact of an employee or member of the public which creates serious alarm, but does
not result in bodily injury.Charging Officer/Employee: F. Richardson Title: Lt.
INMATE NOTIFICATION: YOU WILL APPEAR BEFORE A HEARING OFFICER 24 HOURS OR MORE AFTER YOUR RECEIPT OF
THIS NOTICE. YOU HAVE THE RIGHT TO SUBMIT A WRITTEN STATEMENT AND MAKE A VERBAL STATEMENT.

INMATE WAIVERS:

- ☐
- I GIVE UP MY RIGHT TO 24-HOUR NOTICE AND AUTHORIZE THE HEARING OFFICER TO PROCEED WITH THE HEARING
-
- ☐
- I DO NOT WANT TO BE PRESENT AT MY HEARING
-
- ☒
- I DO WANT MY ACCUSER PRESENT AT THE HEARING
-
- ☐
- I DO NOT WANT MY ACCUSER PRESENT AT THE HEARING
-
- ☐
- I WAIVE MY RIGHT TO A HEARING
-
- SMU/SEGREGATION ONLY
-
- ☒
- I WANT A COUNSEL SUBSTITUTE
-
- ☐
- I DO NOT WANT A COUNSEL SUBSTITUTE

Date & Time Notified: 03/16/10 852 AM/PM By (Print): W. L. T. IE
Inmate Signature: [Signature] SCD #: 113830 Date: 03/16/10

HEARING INFORMATION:

Hearing Date: 3/23/2010 Hearing Time: 11:35 am/pm Tape: 14 Side: A Start: 240 End: 557EXPLAIN BELOW BY NUMBER: (1) IF COUNSEL SUBSTITUTE WAS NOT PRESENT DURING PART OF THE HEARING; (2) IF ACCUSED WAS
EXCLUDED FROM ANY PART OF THE EVIDENCE STAGE; IF ANY (3) WITNESSES, (4) DOCUMENTATION, OR (5) EVIDENCE WAS EXCLUDED
FROM THE HEARING; OR (6) IF INMATE WAS DENIED CONFRONTATION QUESTIONING AND/OR CROSS EXAMINATION OF A WITNESS AT
THE HEARINGNo request to staff received from inmate

OFFENSE CODES	<u>809</u>			
INMATE PLEA (G, NG, None)	<u>NG</u>			
FINDINGS (G, NG, DS)	<u>G</u>			

RECEIVED

LEE CI CLASSIFIED

IF GUILTY, EVIDENCE PRESENTED CONSIDERED AND REASONS FOR DETERMINATION OF GUILT: (A) ADMISSION OF GUILT;
(B) OFFICER'S REPORT; (C) WITNESS TESTIMONY; (D) OTHER. EXPLAIN IN DETAIL:
TestimonyHEARING LENGTH: 10 (MINUTES)

SANCTIONS:

Loss of Privileges (Days) _____ Reprimand: _____ Loss of Good Time (days): _____
* Property (Days) _____ Extra Duty: _____ Restitution: \$ _____ **
* Canteen (Days) 180 Visit Suspension Thru 1/180
* Other phone (Days) 180 Cell Restriction (Days): _____
* Disciplinary Detention (Days): _____SPECIFIC FACTUAL REASON(S) FOR PARTICULAR PUNISHMENT IMPOSED: Nature of Offense

CREDIT FOR PHD TIME SERVED? YES/NO IF YES, DAYS _____

DATE INMATE PLACED IN PHD 1/1INMATE SIGNATURE FOR RECEIPT OF FINAL REPORT: [Signature] DATE: 3/23/10HEARING OFFICER (PRINT NAME) Sharon PattersonAPPROVED/REVERSE/MODIFY [Signature] REASON _____
Warden

CONTACT YOUR CLASSIFICATION CASEWORKER OR COUNSEL SUBSTITUTE IF YOU DO NOT UNDERSTAND THIS FORM.

White - Institutional Record

Canary - Inmate (Service of Disciplinary Report)

Golden Rod - Inmate (Service of Disciplinary Hearing Disposition)

Pink - Central Record

** (Note: When there is restitution, a copy of this form should be forwarded to Financial Accounting.)

SCDC 19-69 (Rev., May 2007)

WARDEN RECORD 060

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091130295 [Date=1/21/2015] [FileNumber=6552300-4]
] [3efc5ddf317864bf4a7ca90d2b05d0d7404889770107ba0f5b856a3e0be91e60906
67a05f64370faeff7fc73cf1115038617eed151920ecee46d408f346c17d9]]

Document description:Exhibit D- Order Granting Summary Judgment

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091130295 [Date=1/21/2015] [FileNumber=6552300-5]
] [c2bdf232b375700fc7aa3a31320b3dc5e8a5e56d1c76bf176f7c7fb32b8598a2cdc
c467d16cf9acceff430791baf1d249c1e6a40589960f981898779d4112123f]]

Document description:Exhibit E- March 11, 2010 Incident Report

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091130295 [Date=1/21/2015] [FileNumber=6552300-6]
] [13268365d97a8df727730375e2ec30f8813d711c6be7440958c029a05f87f7ff5f8
f6fac5c8b699e8d8ae26060e5d0b06e3ef7b150a51a87621675c2a82335b3]]

Document description:Exhibit F- Disciplinary Report & Hearing Record

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091130295 [Date=1/21/2015] [FileNumber=6552300-7]
] [5c4cbb6e0a9e8ad3a73dafc9f2eb00611f868c109f5595e24ad10c84d680822ca80
fc9bff7e4cd6ffecf13774feec165451220629f41a38bdcd2acd1d5b79065]]

Document description:Exhibit G- Medical Summary

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091130295 [Date=1/21/2015] [FileNumber=6552300-8]
] [712acfeb95016b1cfab936fddb896ec20845e4e5c97021af650c64662a662c2c3e0
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Document description:Exhibit H- March 15, 2010 Inmate Step 1 Grievance

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091130295 [Date=1/21/2015] [FileNumber=6552300-9]
] [4de6708e13001678624b35c4b8c5e10b59906ae3a4d595924725671d51ba60cfe1a
405f25125b4238c0abba5fa025c23802c83ee0600a9152eb706f8b446c1ef]]

Document description:Certificate of Service

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091130295 [Date=1/21/2015] [FileNumber=6552300-1
0] [d4b4143bbd6850eb22dae3907b7bf65e2036827c9cc78bff7e89385e9be30260ef
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IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
803-462-3680

Name: Green, Timothy 113830
Patient ID: 1000038843
DOB: 02/14/1964

Acc#: 513431
Patient Phone #:

Exam Date: 03/19/2010
Exam: CT Head w and wo Contrast
Reason: head trauma, lost of memory,
headaches
Referrer: Lee CI, SCDC

CT SCAN OF THE HEAD WITHOUT AND WITH INTRAVENOUS CONTRAST

CLINICAL HISTORY: Head trauma.

TECHNIQUE: Contiguous 5 mm axial images were obtained before and after intravenous administration of 50 cc of Isovue 370. Additional 3 mm axial images through the orbits were obtained.

FINDINGS:

The ventricles and subarachnoid spaces are normal with no evidence of intracranial hemorrhage. There is a small ill-defined area of cortical atrophy probably due to chronic encephalomalacia within the superior posterolateral portion of the right frontal lobe, seen on axial unenhanced scans 26 and 27 and on contrast-enhanced images 63 and 64. No abnormal intracranial enhancement is noted. There is considerable soft tissue swelling over the right face, orbits, and frontal calvarium. No acute fractures are noted. An old fracture deformity of the right zygomatic arch is noted with medial bowing of the right zygomatic arch but without evidence of an acute fracture. The paranasal sinuses and temporal bones are well-pneumatized and clear. The craniocervical junction is normal anatomically.

IMPRESSION:

NO INTRACRANIAL HEMORRHAGE OR ACUTE FACIAL OR CALVARIAL FRACTURES ARE NOTED. AN OLD HEALED FRACTURE DEFORMITY OF THE RIGHT ZYGOMATIC ARCH IS NOTED. A SMALL AREA OF PROBABLE CHRONIC CORTICAL ENCEPHALOMALACIA AND ATROPHY OF THE SUPERIOR-POSTERIOR RIGHT FRONTAL LOBE IS NOTED. THERE IS EXTENSIVE SOFT TISSUE SWELLING OVER THE RIGHT FACE AND ORBIT WITH NO ACUTE FRACTURES.

Martin P. Dommers, M.D.
Electronic Signature
Date Finalized: 03/19/2010

DD: 03/19/2010 DT:03/19/2010

ex2

IMAGECARE, LLC
710 RABON ROAD
COLUMBIA, SC 29203
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Martin P. Dommers, M.D.
 Electronic Signature
 Date Finalized: 03/19/2010

DD: 03/19/2010 DT:03/19/2010

Ker 1254

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INCIDENT REPORT

Exh J

#79

NM4

13-10-045

Page 1 of 1

Institution/Center: Lee CI		Time of Report: Approx 12:30 PM	
Date of Report: 4 Oct 2013		Date of Incident: 4 Oct 2013	
Reporting Official: C/O Plemons		Time of Incident: Approx 11:30 AM	
Location of Incident: Contraband		Employee(s) Involved:	
Inmate(s)/Resident:	SCDC#	Age	Race Sex
1. Green, Timothy	113830		
2.			
3.			
4.			
5.			
		1. Inv. Tisdale	
		2. LPN Dixon	
		3.	
		4.	
		5.	

On the above date and approximate time: I, C/O Plemons received an envelope from Inv. Tisdale that was returned to the mail room unavailable to be delivered. Inside was two SCDC medical envelopes for IM Green, Timothy # 113830. LPN Dixon was asked and confirmed that the medication was prescribed to IM Green and were the medication that was on the label. IM Green will be charged being that he was not taking the medication as he was prescribed.

IM Green, Timothy # 113830 is charged with 903. The Trafficking, Use, and/or Possession of Narcotics, Marijuana, or Unlawful Drugs including Prescription Drugs or Inhalants.

RECEIVED

OCT 07 2013

Signature: C/O R Pflug # 024824

LEECI MAJOR'S OFFICE

Evidence: (1) Envelope returned (2) SCDC Med Packs with Meds

10/11/13

Witness(es): INV Tisdale, LPN Dixon

Supervisor's Comments: Refer to DHO

Signature: [Signature] Title: Lt Date/Time: 10/4/13

Major/Responsible Authority:

903

Signature: A. Pugh Title: Capt. Date: 10-7-13

STG Related - Refer to STG Committee
() Yes () No () Unknown

This Incident is DRUG related
() Yes () No () Unknown

Action Taken

() Informal Resolution
() Administrative Resolution
(X) Refer to Disciplinary Hearing

CONCLUSIONS

Plaintiff states that it is clear that Lt. Franklin Richardson Jr. didn't put Karen Cooper down as a witness because he didn't know what she would say.

And Nurse Karen Cooper didn't agree with Lt. Franklin Richardson Jr. until she sees that she was being sued as well for negligence.

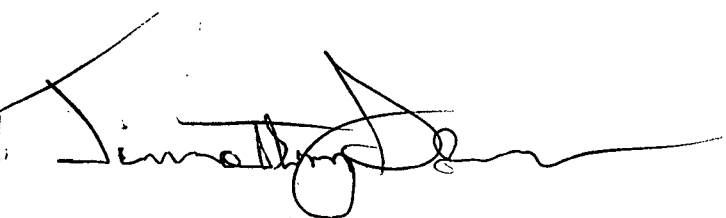
But I have two witnesses to her saying something totally different. A trial or lie detector test would show that they are lying. And that I was brutally assaulted. And they are trying to cover it up. I will agree to a lie detector test anytime.

Because I am truthfully honest about the whole thing. Everything. And I don't curse.

Only a lie detector and or a trial will get to the truth of this matter. I promise you that Lt. Franklin Richardson Jr. or Nurse Cooper will

LEGAL MAIL
SALUDA UNIT

Agree to a lie detector test with my question given
to this honorable court to ask. Not only will he
be fire both of them. They will go to jail. 85%
of the defendant will be fired. They are
corrupt. Give them a lie detector test they'll
quit before they'll take it. GOD is my witness
they will. I pray that this honorable court
grant this case before the court for trial or
give the defendants lie detector test. I know
Lt. Franklin Richardson Jr. will fail as well
as nurse Karen Cooper. I pray this day 1-22-
15 that this court will grant my petition
before them.

I Am 

LEGAL MAIL
SALUDA UNIT

Mr Timothy Green #113830
Broadriver CORR. Inst.
MARION RM #165
#44 60 BROADRIVER Rd.
Cola S.C. 29210



RECEIVED
JAN 29 2015
BRCI
MAILROOM

The South CAROLINA Court of APPEALS
Post office Box 11629
Columbia S.C. 29211
1015 Sumter Street
Cola S.C. 29201

RECEIVED
FEB 03 2015
SC Court of Appeals