

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Appeal from Lexington County
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Civil Case No. 2007-CP-32-1981
Appellate Case No. 2014-001511

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MAY 12 2015
SC Court of Appeals

Martha Lewin Argoe,

Appellant,

v.

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

Respondents.

**RETURN TO MOTION TO SUPPLEMENT DESIGNATION OF
MATTER AND SUPPLEMENT THE RECORD ON APPEAL**

The Appellant has moved to supplement her Designation of Matter to include the Order of Judge Milling (July 3, 2008), and to supplement the Record on Appeal to include the Order of Judge Milling (granting summary judgment to Dr. Steiner), filed July 2, 2008, as previously designated by the Respondent Dr. Steiner. The Respondent Dr. Steiner has no objection to the motion to supplement.

The Appellant has also requested leave of the Court to redact from the Record on Appeal “the social security number and/or driver’s license number of any deponent from the deposition transcripts that were included in the Record on Appeal.” The Respondent Dr. Steiner has no objection to this request, but would request that the Appellant also redact all personal identifying information as required by the Supreme Court’s Revised

Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings, filed April 15, 2014.

The Supreme Court's order requires redaction of:

- 1 Social Security Numbers, Taxpayer Identification Numbers, Driver's License Numbers, Passport Numbers or any other Personal Identifying Numbers. If it is necessary to include personal identifying numbers in a document, the parties should utilize some other identifier. Parties shall not include any portion of a social security number in a filing.¹
2. Names of Minor Children. If a minor is the victim of a sexual assault or the victim in an abuse or neglect case, the minor's name must be completely redacted and a term such as "victim" or "child" should be used. In all other cases, the minor's first name and first initial of the last name (i.e., John S.), or only the minor's initials (i.e., J.S.) should be used.
3. Financial Account Numbers, including any type of Bank Account Numbers, Personal Identification Number (PIN) Code, or Passwords. If financial account numbers are relevant, only the last four digits of these numbers should be used.
4. Home Addresses of minors, sexual assault and abuse and neglect victims, and non-parties. If a home address of a minor, sexual assault victim, or non-party must be included, only the city and state should be used
5. Date of Birth. If a date of birth must be included, only the year of birth should be included.

The undersigned has reviewed the Record on Appeal and found other information subject to redaction in addition to the specific matters referenced in the Appellant's motion, i.e.:

- dates of birth (DOB) in depositions and throughout the many medical records and probate court filings;
- social security numbers throughout the medical records;
- home addresses of non-party witnesses; and
- a tax identification number.

¹ Emphasis in original order.

Below is a list of items that Counsel for the Respondent has observed and submits should be redacted in compliance with the Supreme Court order:

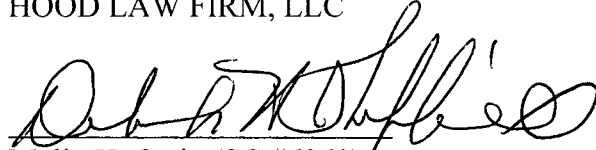
<i>ROA page</i>	<i>Identifier</i>
142	DOB
143	SSN (Plaintiff & her husband's)
144	DOB
145-47	DOB/SSN
297	DOB
298	SSN (x2 - Plaintiff & her husband's)
302	DOB
304	DOB/SSN (x2 - Plaintiff & her husband's)
361	DOB/SSN
365	DOB/SSN
368	DOB
680	DOB
975-76	DOB
987	DOB
989	DOB/Home Add.
1013	Tax Id. No
1035	DOB
1371	DOB
1373-74	DOB/SSN
1375-84	DOB
1385	DOB/Driver Lic. #/Home Add.
1579	DOB
1580	Driver Lic. #

1675	SSN/DOB (x5 - deponent and his 4 children)
1684-86	DOB
1709-12	SSN/DOB
1719	DOB
1720	SSN (partial)
1782	DOB
1792	DOB
1793	Driver Lic. #/SSN (partial)
1905	DOB
1907-42	SSN/DOB
1943	DOB
1961	DOB
1962	Driver Lic. #/SSN (partial)
2003-37	SSN/DOB
2073	DOB
2115	DOB
2180	DOB
2289	DOB
2393	DOB/Home Add.
2515	DOB/Home Add.
2553	SSN/DOB
2557	SSN/DOB
2572	DOB
2573	SSN (x2 - Plaintiff & her husband's)
2575	DOB

The Respondent Dr. Steiner would respectfully request that the Court allow the Appellant to redact all items subject to the Supreme Court's Revised Order, including these and any others that might be found but not specifically listed here.

Respectfully submitted,

HOOD LAW FIRM, LLC



Molly H. Craig (SC #6960)

Elloreë A. Ganes (SC #70509)

Deborah H. Sheffield, *Of Counsel* (SC #2757)

172 Meeting Street ~ P.O. Box 1508

Charleston, South Carolina 29402

Phone. (843) 577-4435

Facsimile: (843) 722-1630

Attorneys for the Respondent Dr. Steiner

May 7, 2015

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SC Court of Appeals

CERTIFICATE OF SERVICE

The undersigned certifies that on this 7th day of May 2015 a copy of the foregoing Return to Motion on behalf of Respondent David A Steiner, M D was served by depositing said copy in the U S Mail, with sufficient first class postage, on the following counsel at the addresses listed below

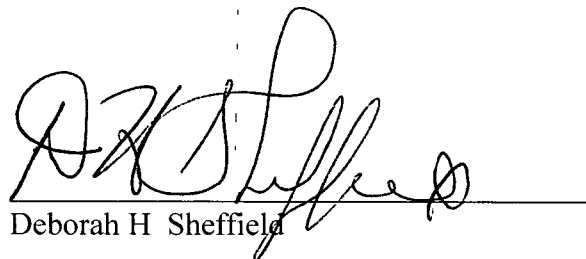
Robert D Dodson, Esquire
Law Offices of Robert Dodson, P A
1722 Main Street, Suite 200
Columbia, SC 29201
Counsel for Appellant

Andrew N Cole, Esquire
Collins & Lacy, PC
PO Box 12487
Columbia, SC 29211
*Counsel for Three Rivers Behavioral Health,
LLC and Doris Ann Burrell, RN*

James E Parham, Jr , Esquire
PO Box 1576
Irmo, SC 29063
Counsel for Cheryl C. Dodds, MD

William H. Davidson, II, Esquire
Andrew Lindemann, Esquire
Davidson & Lindemann, PA
PO Box 8568
Columbia, SC 29204-2442
Counsel for Phyllis Bryan-Mobley, MD

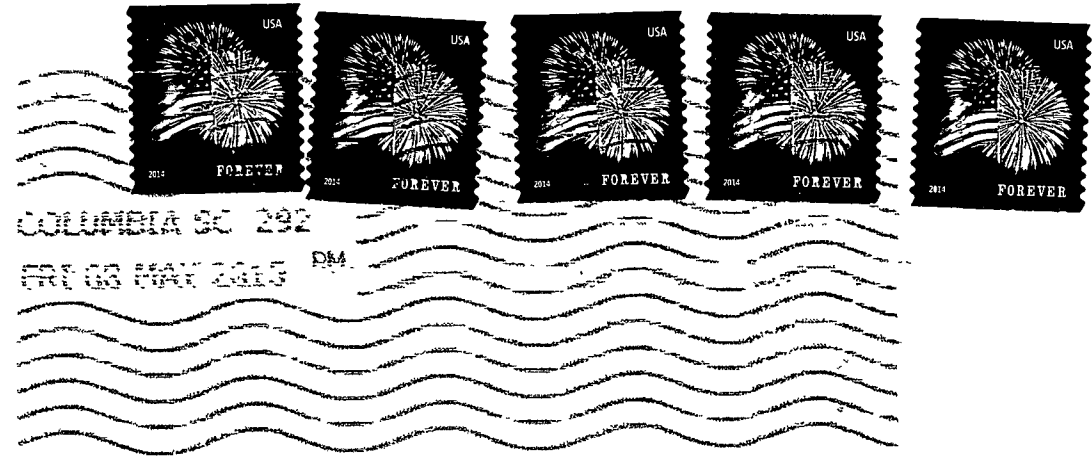
Kenneth N Shaw, Esquire
J Ben Alexander, Esquire
Sarah P Spruill, Esquire
Haynsworth, Sinkler Boyd, PA
PO Box 2048
Greenville, SC 29602
Counsel for Cheryl C. Dodds, MD



Deborah H Sheffield

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Hood I
172 Meeting St.
Charleston, SC 29401



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Hon. Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211