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**THE STATE OF SOUTH CAROLINA**

**In the Court of Appeals**

Appeal from Lexington County  
Court of Common Pleas

**RECEIVED**

William P. Keesley, Circuit Court Judge

SEP 10 2015

**SC Court of Appeals**

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

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.

**MOTION REGARDING REDACTIONS  
TO RECORD ON APPEAL**

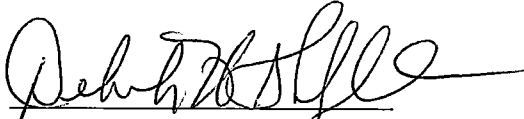
By previous order of the Court dated June 30, 2015, the Appellant was granted leave to file a Supplemental Record on Appeal and ordered to redact identifying information to comply with the Supreme Court's Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings, filed April 15, 2014. Although the Respondent was not served with a copy of a redacted ROA, the undersigned learned, upon inquiry with Court, that the Appellant's Counsel had made manual corrections to the original and copies of the ROA on file with the Court. Upon review of the corrected Record on Appeal volumes I-V as scanned into c-track by the Court and downloaded, the undersigned confirmed that all the information we have previously noted as being subject to redaction has been redacted by the Appellant by

manually marking the information with a black marker. Unfortunately, however, it appears that the some of the personal identifying information can still be seen through the black-marker lines. Specifically, on the downloaded PDFs, the undersigned is able to read data through the blacklines on pages 1385, 1579, 1580, 1675, 1720, 1793, 1962, and 2393. We are bringing this to the Court's attention because it appears that this information may still be vulnerable.

Accordingly, the Respondent Dr. Steiner would respectfully request that the Court order or direct such steps as it deems appropriate and necessary to complete the redaction process to insure the security of all the personal identifying information.

Respectfully submitted,

HOOD LAW FIRM, LLC



Molly H. Craig (SC #6960)

Ellore A. Ganes (SC #70509)

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

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*Attorneys for the Respondent Dr. Steiner*

September 4, 2015

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**CERTIFICATE OF SERVICE**

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The undersigned certifies that on this 4th day of September 2015 a copy of the foregoing 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:

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SEP 10 2015  
SC Court of Appeals

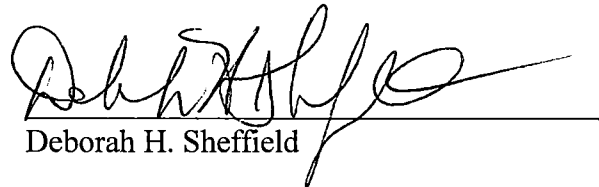
Robert D. Dodson, Esquire  
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Deborah H. Sheffield

September 4, 2015

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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

SEP 10 2015

SC Court of Appeals

RE: Martha Lewin Argoe v. Three Rivers Behavioral Health, et al.  
Appellate Case Tracking No. 2014-001511

Dear Madam Clerk:

By order of June 30, 2015, the Court issued an order directing the Appellant to redact personal identifier information from the Record on Appeal, i.e. social security numbers and dates of birth. I have reviewed the corrected Record on Appeal volumes I-V as they appear on c-trak, and confirmed that all the information identified in our Return was redacted by the Appellant. Unfortunately, however, it appears that the some of the numbers and information can still be seen through the black marker lines. I brought this to the Court's attention because it appears that this information is still vulnerable.

As directed by the Court, I am enclosing for filing the original and six (6) copies of a Motion addressed to this matter along with the \$25.00 filing fee. By copy of this letter I am serving all other counsel of record.

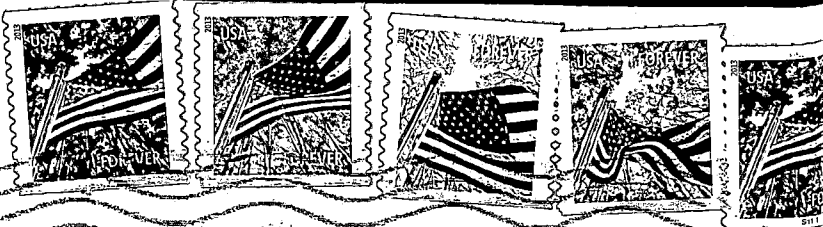
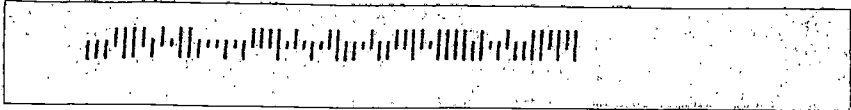
Thank you for your cooperation and consideration of this request.

Sincerely,



Deborah H. Sheffield

cc:  
Robert D. Dodson, Esq.  
Andrew N. Cole, Esq.  
Andrew F. Lindemann, Esq.  
James E. Parham, Jr., Esq.  
Sarah P. Spruill, Esq.



COLUMBIA SC 292

SEP 08 2015

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SEP 10 2015

SC Court of Appeals

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