

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY

Court of Common Pleas

William P. Keesley, Circuit Court Judge

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SC Court of Appeals

Case No. 2007-CP-00-01981

Martha Lewin Argoe,

v. Appellant,

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

Respondents,

**RECORD ON APPEAL
VOLUME II**



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

April 1, 2015
Columbia, South Carolina

Andrew N. Cole, Esquire
Christian Stegmaier, Esquire
Collins & Lacy
PO Box 12487

Columbia, SC 29211

(803) 771-4484

Attorney for Respondents, Three Rivers Behavioral
Health, LLC and Doris Ann Burrell, RN

William H. Davidson, II, Esquire

Andrew F. Lindemann, Esquire

Davidson & Lindemann, P.A.

PO Box 8568

Columbia, SC 29202

(803) 806-8222

Attorney for Respondents, Phyllis Bryan Mobley, MD

James E. Parham, Jr., Esquire

Law Office of James E. Parham, Jr.

PO Box 1576

Irmo, SC 29063

(803) 749-8555

Attorney for Respondent, Cheryl C. Dodds, MD

Kenneth Norman Shaw, Esquire

J. Ben Alexander, Esquire

Sarah Patrick Spruill, Esquire

Haynsworth Sinkler Boyd, P.A.

PO Box 2048

Greenville, SC 29602

(864) 240-3200

Attorney for Respondent, Cheryl C. Dodds, MD

Elloree A. Ganes, Esquire

Mary Anges Hood Craig, Esquire

Deborah Harrison Sheffield, Esquire

Hood Law Firm, LLC

PO Box 1508

Charleston, SC 29402

(843) 577-4435

Attorney for Respondent, David A. Steiner, MD

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STATE OF SOUTH CAROLINA)
) Court of Common Pleas
COUNTY OF LEXINGTON)

Martha Lewin Argoe,)

PLAINTIFF,)

-VS-)

MOTIONS HEARING
2007-CP-32-01981

Three Rivers Behavioral Center,)
Psychiatric Solutions, Phyllis)
Bryant Mobley, Glenn Hooker,)
Aiken Regional Medical Center,)
Aurora Pavilion, David A.)
Steiner, Cheryl C. Dodds, Doris)
Burrell, Carolina Care Plan,)
James Walsh, Jr., et al.,)

DEFENDANTS.)

BEFORE THE HONORABLE WILLIAM P. KEESLEY, JUDGE
AUGUST 29, 2013
LEXINGTON, SOUTH CAROLINA

A P P E A R A N C E S:

Robert Daniel Dodson, Esq.
1722 Main Street, Suite 200
Columbia, SC 29201

James E. Parham, Jr., Esq.
Post Office Box 1576
Irmo, S.C. 29063

Andrew N. Cole, Esq.
1330 Lady St., Sixth Floor
Columbia, S.C. 29201

Elloree A. Ganes, Esq.
172 Meeting Street
Charleston, S.C. 29401

William H. Davidson, II Esq.
1611 Devonshire Drive, Second Floor
Columbia, S.C. 29202

REMA K. GANTT THOMAS
CIRCUIT COURT REPORTER

E-X-H-I-B-I-T-S

PAGE NO.

(There were no exhibits introduced at this hearing.)

1 THE COURT: This matter is Argoe versus
2 Three Rivers, et al. Is there any suggestions on
3 how we proceed?

4 MR. PARHAM: Yes, sir, I think if we could
5 take them chronologically with how the facts went
6 how the facts went.

7 THE COURT: Go ahead.

8 MS. GANES: Thank you, Your Honor. I'm
9 Elloree Ganes on behalf of Dr. David Steiner. This
10 case of course as you are aware has been around for
11 quite some time and the facts go all the way back to
12 April of 2005 when Ms. Argoe's husband and son filed
13 an emergency commitment of her under the South
14 Carolina Probate Code -- under the South Carolina
15 statute for involuntary commitment of a mentally ill
16 persons.

17 She underwent an evaluation locally at
18 Orangeburg, a physical evaluation, and then she went
19 home and then she was picked up and taken to the
20 Aurora Pavilion on June 8th of 2005. June 6 of 2005
21 is when she went over to the hospital.

22 She was taken to the Aurora Pavilion on a
23 valid commitment order. That is the law of this
24 case. It has been disputed and litigated all the
25 way up to the Supreme Court and back.

1 And under Argoe vs. Three Rivers, a
2 Supreme Court opinion, Justice Beatty writes for the
3 Court that Ms. Argoe cannot challenge the validity
4 of her commitment from the initial commitment
5 proceedings all the way through the 43 days and the
6 one year of voluntary treatment that she went
7 through after she had an interaction with my client.

8 So there is no question in this case,
9 there should be no question in this case as to
10 whether her commitment is valid. She came on June 8
11 to the Aurora Pavilion and Dr. Steiner having no
12 prior relationship with her, never seen her before
13 as a patient, being the on-call physician at the
14 Pavilion, he's a psychiatrist, sat down with her and
15 did an initial assessment.

16 He did an initial assessment with her
17 around 5:45 to 6:00, 7:00, 8:00 o'clock in the
18 evening. She had no medications at the Aurora
19 Pavilion. She told him that she trusted her son
20 whom she had given a power of attorney to one year
21 prior and he documented that he would work with her
22 the following day when her son came in and continue
23 with his assessment.

24 She left the next day, approximately 24
25 hours after she saw Dr. Steiner because of the

1 coverage under her Carolina Care Plan health
2 insurance. She left and she went over to Three
3 Rivers.

4 At Three Rivers the Commitment proceedings
5 continued under South Carolina law. She had a
6 guardian ad litem, she had counsel, she had numerous
7 hearings and interventions and testimony taken by
8 her family members and interested parties, and her
9 commitment was upheld medically and clinically for
10 an additional 41 days for a total of a 43 day
11 commitment, in-patient, involuntary commitment.

12 She did finally consent to some treatment
13 at Three Rivers. She agreed to undergo one year of
14 voluntary treatment with Dr. Reemy (PH) down in
15 Beaufort, and she did that. And all of these things
16 have been upheld as valid.

17 We came before this court on motions for
18 summary judgment on numerous causes of action, civil
19 conspiracy, defamation, intentional infliction of
20 emotional distress, and that is why it was
21 ultimately appealed to the Supreme Court.

22 The only thing left in this case after
23 that Supreme Court's opinion was the plaintiff
24 amended her complaint to state a medical negligence
25 cause of action. So we went on and counsel at this

1 table are what's left of this case. I represent Dr.
2 Steiner and there's counsel for Dr. Dodds, Dr.
3 Mobley and Nurse Burrell who had some interaction
4 with Ms. Argoe when she was at Three Rivers.

5 We did discovery in the case. We took the
6 depositions of the plaintiff's experts, Dr. Dave
7 Davis in Atlanta, and a psychologist here in
8 Columbia, a PhD, Dr. Quinn. And those experts gave
9 no opinions related to Dr. Steiner other than the
10 fact that they didn't think Ms. Argoe should have
11 been committed. That has been litigated and is the
12 law of this case that Ms. Argoe's commitment was
13 valid.

14 What needed to happen in the case was the
15 plaintiff needed to bring forth evidence of what the
16 standard of care was through expert testimony, how
17 my client and the other defendants breached that
18 standard of care and how that breaching of the
19 standard of care proximately caused damages to Ms.
20 Argoe.

21 None of that was provided through the
22 expert discovery that we did. And Dr. Davis, his
23 only complaint with Dr. Steiner was basically he
24 disagreed with Dr. Steiner's clinical evaluation.
25 But he didn't disagree on any medical standards of

1 care or any medications that was provided because
2 remember she didn't take any medication.

3 So there's no breaches in the standard of
4 care identified other than he though literally that
5 Dr. Steiner should have gotten on the phone with the
6 judge, after having part one and part two of the
7 valid commitment order, signed by the designated
8 examiner, two designated examiners, Dr. Hooker being
9 one of them who was a defendant to this case but was
10 granted summary judgment early on.

11 That my client Dr. Steiner should have
12 gotten on the phone in the evening hours with the
13 judge and said, Hey, Ms. Argoe is not mentally ill
14 and she needs to be released.

15 That cannot happen under South Carolina
16 law and what Dr. Steiner did was what he was court-
17 ordered to do and bound by a valid court order to
18 do. If he hadn't seen and done an initial
19 assessment on Ms. Argoe he would have been in
20 contempt of court. If he had let her leave the
21 Aurora Pavilion that night he would have been in
22 contempt of court.

23 And Your Honor, there's just no genuine
24 issue of material fact in this case because the
25 defendants will get a charge at trial under the

1 Argoe case that her commitment was valid.

2 And beyond that, Dr. Davis admitted that
3 there were no damages related to these defendants'
4 actions. And he admitted that the standard of care
5 allows a psychiatrist one to two days to make an
6 assessment and really get a good feel of what they
7 are dealing with in a mentally ill person.

8 And Dr. Steiner only saw Ms. Argoe for a
9 very brief period. She didn't take any medication
10 at the Aurora Pavilion and then she was transferred
11 the next day to Three Rivers where she went through
12 the commitment process and she had numerous hearings
13 and her commitment was upheld as valid, ultimately.

14 And based on these arguments, Your Honor,
15 we move for summary judgment in Dr. Steiner's favor.

16 I do have a memo in support of our motion,
17 and all of these things are in this memo. I will
18 hand it up, Your Honor, if that's okay. And I
19 haven't had a chance to get it clocked down with the
20 clerk but I will do that after our hearing here.

21 And Your Honor, I would incorporate all
22 the arguments of the defendant in this case and the
23 deposition testimony that I believe has been filed
24 by Mr. Dodson, Dr. Davis and Frank Quinn, PhD. in
25 support of our motion for summary judgment.

1 Your Honor, Frank Quinn agreed with me in
2 his deposition that Dr. Steiner could not have
3 released Ms. Argoe at the time that he saw her. And
4 that's what all her expert opinions were. It wasn't
5 that they breached any medical standards of care or
6 that they prescribed any inappropriate medications
7 of used any inappropriate medical procedures on her,
8 but basically that they disagreed that she should
9 have been committed.

10 And that is not something that we can
11 relitigate in this case. It is the law of the case
12 that the commitment was valid and she is barred
13 under the doctrine of res judicata for relitigating
14 that at this time. And because of that, there is
15 simply nothing for the parties to put forth at trial
16 on a two-week day certain that is scheduled in
17 October.

18 THE COURT: All right. Anyone else want
19 to talk about this.

20 MR. PARHAM: Your Honor, just one
21 correction, and she may not know that she misspoke.
22 Frank Quinn, one of the plaintiff's experts that she
23 mentioned is not a psychologist. He has a PhD but
24 he is only a licensed-social worker. So there is
25 some question whether he can talk about the standard

1 of care for a psychiatrist.

2 So I wanted to correct that so you won't
3 get the wrong impression. He is not a psychologist.
4 He is a licensed social worker. He doesn't have the
5 ability to diagnose or even to treat.

6 THE COURT: Anyone else?

7 MR. DAVIDSON: How do you want to do this?
8 Whether you want to let Mr. Dodson go and address
9 her arguments or--

10 THE COURT: I want to address her motion
11 first. Do you have anything on this?

12 MR. DAVIDSON: Not on her's.. I've got my
13 own.

14 THE COURT: Thank you.

15 MR. DODSON: Thank you, Your Honor. I'm
16 Robert Dodson on behalf of the Plaintiff Martha
17 Argoe. All of this involuntary commitment talk,
18 probate court orders, South Carolina Supreme Court
19 orders, every bit of that is just a red herring.
20 None of that, not a single bit, had anything to do
21 with the remaining medical malpractice claim. Other
22 than the fact it was the involuntary commitment
23 process that got this ball rolling.

24 But other than that, has nothing to do
25 with it, and it's a red herring. And here's why

1 it's a red herring, Your Honor. It is because once
2 Ms. Argoe was involuntarily committed it was a
3 medical psychiatric decision that the doctors and
4 nurses had to make as to when to release her.

5 This is a misdiagnosis case. What we say,
6 because -- and it's a misdiagnose case because they
7 diagnosed Ms. Argoe as suffering from psychosis and
8 suffering from bi-polar disorder. They didn't do
9 any appropriate testing to make that diagnosis.

10 And that is the very first criteria for
11 involuntarily committing somebody but also once they
12 are involuntarily committed continuing to hold them
13 against their will.

14 What our expert, Dr. Davis, testified to
15 was that every one of the remaining defendants left
16 had an independent medical duty under the applicable
17 standards of care for psychiatrists and the nursing
18 staff at Three Rivers to independently assess Ms.
19 Argoe and determine did she have a mental illness,
20 which he opined based not on just reading the
21 records but actually testing Ms. Argoe, something
22 these defendants didn't do.

23 But he opined that she didn't have a
24 mental disorder. So she should have been released
25 by the defendants because of that. But he also

1 opined that even if she did have some sort of mental
2 disorder, that she doesn't have, she was at no point
3 during her commitment a danger to herself or other
4 people.

5 You know, these involuntary commitments
6 are not prison sentences. When a probate court
7 judge signs an order of involuntary commitment, you
8 don't go back to court and ask the judge for an
9 additional order releasing the patient. That is a
10 clinical, medical, psychiatric decision that the
11 nursing staff has to do under the then applicable
12 standards of care for psychiatrists, psychologists,
13 nursing staff, what have you.

14 But that's a clinical judgment. It's not
15 a legal judgment. And it is interesting to me that
16 Ms. Ganes would make the argument that if her client
17 had released Mr. Argoe he would have been in
18 contempt of court.

19 I say it's interesting to me because when
20 Ms. Argoe was finally released 41 days, 41 days
21 after her involuntary commitment, by Dr. Dodds, Dr.
22 Dodds didn't go back to court and get a court order
23 and say I'm going to release her. Dr. Dodds made a
24 clinical judgment she's no longer a danger to
25 herself or others.

1 Now, why did she make that clinical
2 judgment? Well, because the money, the insurance
3 money from Ms. Argoe's health insurance had run out
4 and she wasn't getting paid at that point.

5 But that was a clinical judgment. What we
6 contend is that that judgment should have been made
7 by Dr. Steiner when he initially saw her, by the
8 nurses at Three Rivers when they saw her, by Dr.
9 Mobley, and then by Dr. Dodds. This woman was at no
10 point a danger to herself or other people and no
11 reasonable psychiatrist, nursing staff would have
12 come to the conclusion that they were.

13 I submitted to Your Honor and the court a
14 few days ago the deposition of Dr. Dave Davis who is
15 a prominent psychiatrist and medical doctor in
16 Atlanta. And I will just point out a couple of
17 things, Your Honor. Ms. Ganes is questioning him
18 about could Dr. Steiner have actually released Ms.
19 Argoe.

20 And if you look pages 23 and 24 he pretty
21 clearly says there's no reason why he could not and
22 should not have released her. If you look at page
23 169 of his deposition testimony this is what he
24 says.

25 The question was asked, "Do you have any

1 opinions on whether Drs. Steiner, Mobley and or
2 Dodds should have discharged her at any point during
3 this 41 day involuntary commitment?"

4 Answer, "Yes."

5 Question, "And what are those opinions?"

6 Answer, "That there was their duty to, to
7 not hold her against her will. That they could have
8 discharged her."

9 A little earlier in the deposition he
10 indicated quite clearly what he believed Ms. Argoe's
11 damages or injuries were. On page 163, "She was
12 deprived of her liberty." Those were his words, not
13 mine. She was deprived or her liberty.

14 So the fact that there was an intersection
15 between the law and medicine doesn't alleviate these
16 defendants of their responsibility because when it
17 comes to involuntary commitment or anything else,
18 and with all due respect to Your Honor, judges don't
19 make clinical assessments. Judges don't make
20 medical decisions about when somebody should be
21 discharged from the hospital. That's a clinical
22 decision that the doctors had to do.

23 And in this case, they blew it. That is
24 what our experts say. They blew it. This lady did
25 not have, does not have any kind of mental disorder

1 and she was certainly not a danger to herself or
2 other people. And no reasonable psychiatrist would
3 have come to that conclusion.

4 MS. GANES: Your Honor, just briefly in
5 response. And I'm not sure how much of this you're
6 already familiar with so I don't want to go over a
7 lot of the facts that you might be abundantly aware
8 of.

9 But in the involuntary commitment paper
10 work that came to Dr. Steiner he didn't make the
11 assessment about the fact that Ms. Argoe carries a
12 hand gun on her left hip all the time, that she's a
13 danger to herself and others, she is suspicious of
14 others and as the result has removed silverware and
15 other items out of the house and numerous other
16 things that were listed on Exhibit A attached to Dr.
17 Steiner's memorandum in support of motion for
18 summary judgment.

19 Those were things that came through the
20 court order and through the history provided by
21 those who were familiar with Ms. Argoe. Dr. Steiner
22 was receiving this patient in the evening and he did
23 have valid commitment paper work that he had to act
24 upon. He was bound by the court order to act upon
25 it.

1 And Your Honor, I submit to you and I
2 stand by it that if he discharged Ms. Argoe, number
3 one in the evening hours, and let her go walk out on
4 the street or call a cab, if something happened to
5 her or happened to some family member who has used
6 the probate court's commitment process to send her
7 to the Aurora Pavilion, I believe that a judge would
8 absolutely be able to hold him in contempt of court
9 for that conduct.

10 So based on that, we believe that there is
11 no other decision other than to grant Dr. Steiner
12 summary judgement in this case. This issue of
13 whether there's a valid commitment is over. It is
14 done.

15 The doctors did not deprive Ms. Argoe of
16 her liberty, the Court did that. And the Court did
17 that based on it's own impression and based on
18 taking testimony from individuals.

19 And this goes more to the other
20 defendant's argument, based on testimony from the
21 other medical care providers as well as individuals
22 who were not part of the medical community and knew
23 Ms. Argoe and who were appointed to represent Ms.
24 Argoe at the hearings that took place through the
25 valid commitment process over the 41 days following

1 her interaction with Dr. Steiner.

2 THE COURT: Anything else on this motion?

3 MR. DODSON: Your Honor, I'll say I'll be
4 brief.

5 THE COURT: Okay.

6 MR. DODSON: She just said why summary
7 judgment is not appropriate. She just said he
8 disagrees with the clinical assessment.

9 Yep, that's right, I disagree with the
10 clinical assessment.

11 That's exactly what this case is all
12 about. We are not challenging the validity of the
13 probate court's order. I disagree with the order
14 but -- and I respectfully disagree with the Supreme
15 Court's decision interpreting that order. That's
16 not what we are here about today.

17 What we are here about today is take all
18 of these court orders as valid because they are.
19 The Supreme Court has said so. It doesn't matter.
20 These doctors, including Dr. Steiner, Ms. Ganes'
21 client, had an independent duty, a medical duty,
22 under the then applicable standard of care to
23 evaluate this woman.

24 To determine, number one: Does she have a
25 mental illness. Number two: Because of that mental

1 illness is she a danger to herself or others? Those
2 are clinical judgments they have to make.

3 If she doesn't meet those criteria she has
4 to be released. They didn't do their jobs, they
5 didn't do a proper medical, psychiatric assessment
6 on her to come to a reasonable conclusion as to
7 whether or not she had a mental illness.

8 They didn't do their job as to whether or
9 not she was a danger to herself or other people.
10 When I say that they didn't do their job, they
11 didn't do their job as doctors, as nurses, as
12 psychiatrists. Not as court officials, they are not
13 court officials. They didn't do their jobs as
14 doctors, as nurses.

15 THE COURT: Is there anything else on this
16 motion?

17 MS. GANES: No, sir, Your Honor.

18 THE COURT: Okay, what's the next motion?

19 MR. DAVIDSON: The next motion is my
20 motion for summary judgment on behalf of Dr. Mobley.
21 I kind of want to go a little bit more through the
22 facts where you can get a little bit better of a
23 feel where we are in this case.

24 Dr. Mobley is a psychiatrist who practices
25 at Three Rivers. So the Court can kind of get the

1 time line, Dr. Hooker who I represented along with
2 Dr. Mobley eventually was dismissed at the first
3 summary judgment stage, saw Ms. Argoe on June 8,
4 2005, as the result of an application for emergency
5 admission.

6 Dr. Hooker evaluated Ms. Argoe and
7 actually in the memo and supporting documentation,
8 which I have given to plaintiff's counsel. From the
9 first motion for summary judgment we filed an
10 affidavit for Dr. Hooker and that's in that package
11 but it's in the file already.

12 Dr. Hooker after having evaluated her and
13 actually having referred her to Orangeburg Regional
14 for a brain scan determined that she in fact met the
15 criteria of a danger to herself or others,
16 substantial risk, to be involuntarily admitted to a
17 psychiatric facility for observation and treatment
18 and ultimately to go through the probate process for
19 dealing with these types of issues.

20 As the result of that she was transferred
21 from Orangeburg to Aiken Regional Medical Center,
22 their Aurora Pavilion, which is where they house
23 individuals who are psychiatrically in need. And
24 that's where Dr. Steiner saw her and evaluated her
25 on what I call an initial history, and found in fact

1 that she did have psychiatric issues.

2 Ms. Ganes was correct, as the result of
3 insurance issues, she was transferred the next day
4 on June 9, 2005 to the Three Rivers Hospital
5 pursuant to the order for detention that was
6 provided for by Dr. Hooker. And that's where Dr.
7 Mobley actually took over her care and treatment.

8 Dr. Mobley saw Ms. Argoe and began the
9 process of evaluating her and providing certain
10 treatments for her in hopes that she would stabilize
11 and ultimately be able to be released from the
12 facility.

13 Dr. Mobley, as the record will indicate,
14 had Ms. Argoe evaluated not only by her but also by
15 a Dr. Heath, a Dr. Dasanni (PH) and by a
16 psychologist who did some testing on her at Three
17 Rivers, ultimately. In looking at those, which we
18 have attached they all found that she was having
19 psychiatric issues and needed treatment.

20 Now, the interesting thing in this case,
21 and I want to make sure the Court is aware, Mr.
22 Dodson talked about probate procedures, this matter
23 was in fact in the probate court and on June 13, Dr.
24 -- excuse, Judge Marion Lawson, probate judge from
25 Darlington, I believe, appointed Dr. Mobley as the

1 designated examiner for the evaluation of Ms. Argoe.

2 Also appointed was Nurse Burrell, who Mr.
3 Cole represents. That was on June 13th. In fact,
4 on June 13th, in accordance with the probate filing,
5 and we attached these orders so the Court can take
6 judicial notice of them.

7 Dr. Lawson stated that on June 21st, 2005,
8 at 9:15 a.m. he was going to have a hearing to
9 determine whether or not she should or should not be
10 retained at Three Rivers because of her psychiatric
11 condition. And I think it's important to look at
12 Judge Lawson's order in that instance.

13 And its based on P010, which is attached
14 to the packet of information. Judge Lawson signed
15 the order and says as follows, "Upon reviewing the
16 application of emergency admission, the
17 certification of a licensed physician and additional
18 documentation submitted by the treatment facility in
19 this matter, I find in these documents evidence that
20 the above individual is mentally ill and in need of
21 emergency hospitalization.

22 Based on that evidence, I determined there
23 was probable cause to continue the emergency
24 commitment of the above person pursuant to the
25 provisions of 44 17 14 of the S. C. Code, as

1 amended." And that was signed by Judge Lawson.

2 Ultimately Dr. Mobley and Ms. Burrell in
3 fact evaluated this lady and a hearing was held.
4 Now, at that hearing, as the Court is aware, not
5 only does Ms. Argoe have a guardian ad litem, but
6 she has an attorney. And in the court documents
7 which we have attached, she had an attorney by the
8 name of Alvin Neal. Her husband was present, her
9 son was present, and testimony was received.

10 And on that date after the hearing and
11 accordance with due process in regard to the probate
12 court proceeding for involuntary commitment, Judge
13 Lawson found that the above person is mentally
14 person, he adjudged and ordered she is mentally ill.
15 Your Honor, he adjudged and ordered that she was
16 mentally ill.

17 And because of her mental condition lacked
18 sufficient insight or capacity to make responsible
19 decision with respect to her treatment. And because
20 of her condition there is a likelihood of serious
21 harm to herself and or others.

22 And therefore, he committed her to the
23 hospital for inpatient care and treatment, in
24 accordance with the rule, and said that upon her
25 discharge she was to undergo outpatient treatment at

1 an Orangeburg mental health facility for a period
2 not to exceed twelve months. And he signed that on
3 June 21.

4 Now, shortly thereafter, I believe on June
5 26th, Dr. Mobley left for an extended vacation and
6 Dr. Dodds took over the case. In this case, it's
7 our position that Dr. Mobley, who was in the
8 original summary judgment and had all the causes of
9 action dismissed including assault and battery,
10 violation of HIPPA, defamation, intentional
11 infliction of emotional distress, false
12 imprisonment, conspiracy, abuse of process, all
13 dismissed.

14 So we are down to the question of whether
15 or not Dr. Mobley should have released this
16 individual and whether or not the treatment was
17 appropriate under the circumstances.

18 In this case, Your Honor, number one: Ms.
19 Argoe at the hearing, which determined that she
20 should be committed for indeterminate length of time
21 to be determined upon when she was ready for
22 discharge, had attorneys that could have appealed
23 that ruling and contested it in the appropriate
24 court. There was no hearing.

25 In this instance, Dr. Mobley, based on her

1 evaluation and the testimony that she gave,
2 presented the evidence to a neutral, detached, third
3 party, Judge Lawson, who determined that she should
4 remain admitted until she was at the point she could
5 be released.

6 Now, I agree with Mr. Dodson that the
7 release decision is left to the judge. But that
8 doesn't mean that a lawyer representing the
9 individual who is alleged to be incapacitated,
10 cannot petition the court to have another hearing to
11 determine if the individual should be released.
12 There was no petition. So it's basically a habeas
13 action.

14 Number two, the court and the legislature
15 have recognized and has provided immunity for
16 doctors and release decision, 44 17 900, that
17 doctors during the process of releasing an
18 individual is immune from suit.

19 Why? The idea is that if a doctor makes a
20 judgment call and releases that individual, they are
21 acting in the place of the court. We've got the
22 Vaughn case, which we cited in our brief which dealt
23 with the guardianship of a court-appointed doctor
24 who was involved in somebody in that, and our
25 Supreme Court basically said the doctors in that

1 situation have absolute quasi judicial immunity for
2 the process that they are involved in regard to
3 whether or not somebody should or should not
4 be held within a facility.

5 Why? Well, number one, no doctor in their
6 right mind is going to accept designated
7 appointments or treat individuals under involuntary
8 commitment if they know they can be sued for
9 anything they do in the probate process.

10 Number two, the decision to release is a
11 quasi-judicial type decision. Our legislature has
12 given them immunity for that decision and that the
13 same is true for deciding not to release because
14 that decision has been by default given to the
15 doctor by the judicial court so the doctor can make
16 that decision without having to come back to court.

17 That doesn't mean you can't petition and
18 come back to court, but in this instance our
19 legislative scheme has allowed the physician to
20 decide when somebody should be released.

21 In Argoe One, which is cited at 710 S.E.
22 2nd 67, the Court found that Three Rivers has quasi-
23 judicial immunity in regard to commitment orders.
24 Well, if Three Rivers has quasi-judicial immunity
25 the doctors who are involved in that process would

1 also enjoy that immunity.

2 The Court also found in Argoe, having
3 found that the underlying commitment order was valid
4 and then finding later on, like I said, "We hold
5 that the appellant could not, as a matter of law,
6 maintain the claim of infliction of emotional
7 distress against the respondent, Three Rivers, as
8 respondent's conduct toward the plaintiff was
9 reasonable in accordance with a valid probate
10 order." Talking about Three Rivers.

11 Now, Mr. Dodson made mention that, and I
12 would also cite the Fleming case because it also
13 deals with guardian ad litem and private custody and
14 immunity and quasi-judicial immunity. He mentioned
15 about the fact that Dr. Davis had seen this
16 individual and determined that she was not mentally
17 ill.

18 Well, he didn't see her until April 24,
19 2008, some three years after these events. At that
20 time he was retained by plaintiff's counsel in
21 regard to not only this matter but also in the
22 family court.

23 The other point, Your Honor, is that in
24 Dr. Davis' testimony he indicated that if in fact
25 Ms. Argoe was mentally ill that the treatment

1 provided would be appropriate. I believe that's on
2 147, I think Mr. Parham is going to address that,
3 from Dr. Davis' deposition.

4 Well, we have a judicial order that finds
5 that she's mentally ill and that she should be in
6 fact hospitalized and treated by the physicians. We
7 also have in the deposition of Dr. Davis where he
8 indicated -- you have to understand that this lady
9 went out after -- let's see, Dr. Mobley saw her and
10 continued to treat her five days after the hearing.
11 She was then turned over to Dr. Dodds.

12 At the time of her discharg she was seen
13 by another set of doctors on out-patient basis. The
14 record reflects that during that period of time she
15 was treated by those physicians with medication.
16 Dr. Davis in his deposition testified that in fact -
17 - I believe -- I have the page here. There was no
18 evidence of any side effects from the medication or
19 any damage from the medications. She she was just
20 mad from being held.

21 Well, I appreciate the fact that she was
22 mad or angry, the fact that she was held at a
23 psychiatric facility for treatment. But a judicial
24 officer who made the ruling which was subject to an
25 appeal, made that decision based on his neutral

1 third party detached evaluation of the evidence,
2 that she was a potential danger either to herself or
3 others.

4 Dr. Mobley treated her during that period
5 of time, was a witness which treated her in
6 accordance with a court order. Was a witness as a
7 DE at the hearing and therefore it's our position
8 that Dr. Mobley, after the hearing, which said she
9 was mentally ill and needed to be kept until she
10 could be released, enjoyed absolute quasi-judicial
11 immunity and there is no evidence that most probably
12 within a reasonable degree of medical treatment that
13 Dr. Mobley in treating this individual who
14 judicially had been determined to be mentally ill,
15 deviated one area from the standard of care.

16 Now, there's talking about disagreement of
17 diagnosis, all the diagnosis in this case deal with
18 her provisional diagnosis of being bi-polar or
19 having a psychosis or a break with reality.

20 But in any event, whatever you call it,
21 the judge said she was mentally ill. And that is a
22 finding that is on appeal from and the defendants
23 are entitled to enjoy issue preclusion on that
24 point.

25 The Supreme Court order found that those

1 orders are valid and therefore it's our position
2 that Dr. Mobley should be dismissed from this
3 lawsuit in its entirety.

4 Thank you, Your Honor.

5 THE COURT: Anyone else want to speak on
6 this motion?

7 MR. DODSON: Thank you, Your Honor. I've
8 been sitting over here patiently, chomping at the
9 bit. And the reason I've been chomping at the bit
10 is because Mr. Davidson has gone on and on talking
11 about apples. He's talking about all this judicial
12 process. He has talked about appeals of the probate
13 court order, he has talked about Argoe One and Argoe
14 Two up at the Supreme Court.

15 We are not here about apples. We are not
16 here about the judicial process. We're not here
17 challenging the probate court's orders. We're not
18 here challenging the Supreme Court's orders,
19 anything like that.

20 That's why the first things I told Your
21 Honor was that that's a red herring. We're here
22 about oranges. And the oranges of the case is that
23 what is now remaining of this case is a medical
24 malpractice case. We have alleged and we have
25 produced expert testimony from an MD as well as an

1 RN and a PhD that Ms. Argoe did not in fact have any
2 kind of mental illness.

3 And therefore, the doctors, the nurses,
4 had a duty. Not as officers of the court, but as
5 doctors and nurses to discharge her from the
6 hospital. Not unlike the duty that a surgeon has
7 after that surgeon performs surgery on a patient and
8 determines the patient is ready to go home. I'm
9 going to discharge them from the hospital. It's the
10 same thing.

11 And it really comes down to this, and I'm
12 surprised that in all the talk about apples, apples,
13 apples, Mr. Davidson did say this, he said, and I
14 wrote it down, "I agree with Mr. Dodson that the
15 doctor makes the decision to release." That's
16 exactly why we are here today.

17 The fact that there is an intersection
18 between law and medicine doesn't change the fact
19 that we contend, and our experts support us, that
20 these doctors, these nurses, blew it. They did not
21 appropriately diagnose her, they misdiagnosed her
22 and therefore the case and treatment that they
23 provided to her was inappropriate and unnecessary.

24 That care and treatment included
25 involuntary commitment. That care and treatment

1 included force feeding her powerful psychiatric
2 medication that she did not want or need. And I
3 might add that that continued for a year after her
4 discharge. They required her to take these meds for
5 a year after her discharge.

6 What we contend is that medically
7 speaking, that's not appropriate care and treatment.
8 And it's not appropriate care and treatment because
9 that's not what reasonably prudent psychiatrists
10 would do. And we have supported that through expert
11 testimony.

12 Now, Mr. Davidson said this question of
13 releasing her is a quasi-judicial decision. No,
14 it's not. Hog wash. Absolute total nonsense. I
15 want to see one Supreme Court case or one Court of
16 Appeals case that says that's the law. Because I
17 haven't seen one and I've looked hard.

18 That's just like what every other doctor
19 done. Doctors make decisions on when people are
20 released from the hospital, not courts of law. And
21 when Ms. Argoe was eventually released by Dr. Dodds,
22 Dr. Dodds didn't go back to court and get a court
23 order to release her. Dr. Dodds just released her.

24 Dr. Dodds after releasing her never
25 returned to court to get any kind of documentation.

1 Dr. Dodds just released her. The only additional
2 court intervention in this was sought by Ms. Argoe.
3 But that has absolutely nothing to do with the
4 medicine in this case.

5 And the real reason that Mr. Davidson
6 wants to sit up there and talk about apples, apples,
7 apples, talk about the judicial process, Argoe One,
8 and Argoe Two and probate court orders is because
9 when you look at this, simply from the medical
10 malpractice standpoint, take all the apples out of
11 it.

12 When you look at just the oranges, when
13 you look at just the medicine in this, this is
14 really a fairly plain vanilla, ordinary medical
15 malpractice case. A misdiagnosis case. They say we
16 didn't misdiagnose. Our diagnosis was reasonable.
17 We say and our experts say no it wasn't. We have
18 damages as the result of that. It's no different
19 from any other medical malpractice case. Other than
20 the fact that in addition to the medical malpractice
21 case you have an intersection with the law.

22 But that intersection with the law doesn't
23 alleviate these defendants from their duty as
24 medical doctors. There's no case that says once
25 somebody is involuntarily committed you get free

1 license to commit medical malpractice. There's no
2 case that says that. There's no statute that says
3 that.

4 The statute that he referred to, 44 17-
5 900, when you look at the cases that are associated
6 with that statute, the cases are in line with this.
7 They release somebody from the hospital, who was
8 alleged to have had a mental disorder, the doctors
9 release them.

10 That person goes out and kills themselves,
11 they commit a violent act on a third party. The
12 doctors are insulated in those situations from
13 liability. That's what the statute has done. Third
14 parties can't come in and sue the doctors because
15 they released somebody.

16 But a patient of that doctor, who has a
17 doctor-patient relationship, most certainly can sue
18 that physician for committing malpractice and
19 practicing medicine below the applicable standard of
20 care. And that statute doesn't say anything to the
21 contrary.

22 THE COURT: Is there anything else on this
23 motion?

24 MR. DAVIDSON: Your Honor, whether you
25 want to call it an apple or an orange, I've got a

1 court order that says she's mentally ill, that she
2 has to be hospitalized. I have a doctor who
3 prescribed appropriate medication. He just said she
4 wasn't mentally ill and they should have release
5 her.

6 My doctor, Dr. Mobley, essentially treated
7 her from about the tenth until the 26th. During
8 that period of time the court in fact issued various
9 orders dealing with Ms. Argoe and her case, and
10 found her mentally ill and found that she was
11 subject to hospitalization, found that she needed
12 treatment, and ultimately found that she needed to
13 have treatment for a year out-patient, which she
14 received.

15 Even those doctors who saw her were not
16 defendants in this matter, prescribed the
17 appropriate medication. Our position, Your Honor,
18 but if you want to call it an apple, an orange,
19 peach or pear or whatever, the law in this case is
20 the probate court made the judicial decision to
21 commit. The probate system is in place in such a
22 way as to allow individuals the right to due process
23 and appeal if you are grieved by those rulings.

24 This is not a malpractice case. It's an
25 appeal of those decisions whether or not she was or

1 was not mentally ill, as found by the probate judge.
2 and whether or not he was not correct in making his
3 ruling she should be hospitalized.

4 There's nothing in this record that would
5 indicate Dr. Mobley did anything inappropriate in
6 regard to the retention of Ms. Argoe or the
7 treatment of Ms. Argoe based on her being found
8 mentally ill.

9 Mr. Parham is next.

10 THE COURT: How many motions do we have?

11 MR. DODSON: Two more, Your Honor.

12 MR. COLE: Your Honor, there are several
13 that were filed but aren't being argued.

14 MR. DODSON: Yes, Your Honor, I might just
15 address those now. Psychiatric Solutions was
16 dismissed sometime ago. They are no longer a party
17 to this action. Carolina Care Plan was dismissed.
18 I just signed the stipulation of dismissal yesterday
19 for that.

20 And there was another defendant who was
21 also dismissed, Aiken Regional. Aiken Regional was
22 also dismissed. So those other motions for summary
23 judgment that I think all of them had filed are moot
24 because we voluntarily have dismissed those that
25 didn't need to be here and aren't really a part of

1 the case.

2 We just had to get some discovery to
3 figure all of that out, Your Honor.

4 MR. PARHAM: Your Honor, do you want to
5 take a break?

6 THE COURT: Yes, I want to take a ten-
7 minute break and then I'll hear the other two
8 motions.

9 MR. PARHAM: Thank you, Judge.

10 (Whereupon, a recess was
11 observed after which the following proceedings were
12 had:)

13 THE COURT: All right, what's the next
14 motion?

15 MR. PARHAM: Yes, sir, may it please Your
16 Honor. I'm Jim Parham representing Dr. Dodds. You
17 probably already have a copy but this is what I'm
18 going to refer to in my argument. Your Honor, as
19 you have heard from the other arguments, Dr. Dodds
20 is the last person who took over and treated Ms.
21 Argoe at Three Rivers.

22 As the result of Dr. Mobley going on
23 vacation on June 27, 2005 Dr. Dodds so had the
24 treatment of Ms. Argoe from that point until July
25 20, 2005 when she was discharged.

1 Again, Your Honor, at that point Dr. Dodds
2 has absolutely no involvement whatsoever in any of
3 the probate court proceedings that came before her
4 treatment starting with Dr. Hooker, who is no longer
5 a defendant. He was discharged by the court and the
6 order was not appealed. (I stopped proofing)

7 Dr. Steiner, you met already. And then
8 Aiken was a defendant and they have been voluntarily
9 dismissed. Then we go to Three Rivers and we have
10 Burrell. And we have Dr. Mobley after the probate
11 court and then Dr. Dodds.

12 And then as told, Your Honor, from the
13 probate court order from the June 21st 2005 hearing,
14 after discharge at whatever point Ms. Argoe went
15 under a court ordered one-year outpatient treatment.
16 Which she chose, instead of Orangeburg she chose the
17 Beaufort County Area Mental Health. It's called
18 Coastal. And she remained under that treatment for
19 a year. And she didn't sue them.

20 Your Honor, the position I take first and
21 foremost is that, as already has been mentioned by
22 Mr. Davidson, in the Argoe opinion referenced 710 SE
23 2nd 67, and I handed up copy, Your Honor.

24 Let me back up, my argument simply is
25 going to be two-fold, Your Honor. One is going to

1 be on a legal basis and the other one is going to be
2 a response to Mr. Dodson as far as the medical
3 basis.

4 But on a legal basis, Your Honor, it is
5 clear from the court's order, on the next to the
6 last page of what I have, handed up to you it's page
7 7 out of ten. Right at the bottom it says
8 additionally Judge McMahon held that Three Rivers
9 was entitled to Quasi-judicial immunity as treating
10 appellant, Mr. Argoe, pursuant to an involuntary
11 commitment order.

12 And as Mr. Davidson has already said, the
13 Supreme Court has stated that Three Rivers is
14 entitled to quasi-judicial immunity because it is
15 treating Ms. Argoe under an involuntary commitment
16 order.

17 And Three Rivers is treating Ms. Argoe
18 under that order through the physicians, including
19 my client, Dr. Dodds. Therefore, our state Supreme
20 Court in this Argoe opinion has already stated that
21 Dr. Dodds is entitled to quasi-judicial immunity in
22 her treatment of Ms. Argoe.

23 Your Honor, what has not been said, and I
24 handed up to you the statute. I apologize for
25 repeating it, but the statute is 44-17-580 of the

1 Code entitled " Hospitalization of person the Court
2 finds mental illness and other conditions."

3 Your Honor, as I understand it, and I
4 think it has come out in some of the testimony of
5 the experts and even the defendants, the Court at
6 the time they hold the formal hearing, in this case
7 on June 21, 2005, has the ability to make three
8 choices.

9 One is no longer is this person mentally
10 ill and should be immediately discharged.

11 Number Two, the Court can say this person
12 is mentally ill as Judge Lawson did in his court
13 order which I handed up. And this person is to
14 remain in in-patient care for a period of time. At
15 this point the Court has two choices. The Court can
16 actually issue an order designating a specific
17 period of time that the patient, such as Ms. Argoe
18 can remain in-patient and at the end of that time
19 have another hearing to determine whether that
20 patient should continue with in-patient care.

21 The third choice is if the court does not
22 want to take the burden of being responsible for
23 that patient and the amount of time that patient
24 should have in patient care, the court can designate
25 and transfer its judicial authority to a doctor. In

1 this case Dr. Dodds.

2 Well, Dr. Mobley to begin with and then
3 Dr. Dodds to make a determination of when that point
4 should occur so that the court does not have to have
5 another formal hearing to decide whether there is
6 discharge.

7 In this case Judge Lawson chose the second
8 prong and that was to transfer the judicial
9 authority of this mentally ill patient that the
10 court determined exists to a doctor or doctors to
11 determine when she was stable in order to be
12 discharged. And then Judge Lawson's order extends
13 that treatment to an out-patient setting for a year.

14 So there's where judicial qualified
15 immunity comes in, Your Honor. Qualified judicial
16 immunity, is the fact that the court has taken the
17 decision and transferred its responsibility. And in
18 fact, the Code 44-17-580 also states that
19 jurisdiction of this mentally ill patient remains
20 with the court until the order is completed.

21 So the court still has responsibility for
22 Ms. Argoe all the way through the one year of out-
23 patient treatment she is ordered to undergo once she
24 is discharged. And that's the basis of my argument
25 for Dr. Dodds. Judge Lawson on behalf of the

1 probate court issued an order transferring the
2 responsibility to her to treat Ms. Argoe as a
3 mentally ill patient and then once discharged have
4 outpatient care.

5 Your Honor, I found a case, and this is
6 what I think is the problem because if you read the
7 Vaughn case that I handed up to you, Your Honor,
8 which is a case from -- I apologize, from 2007
9 dealing with a court-appointed examiner in a probate
10 case.

11 The court was very concerned at this point
12 -- it's 33-72-SC 505, 2007, Your Honor. You've got
13 a copy. At various times the opinion talks about
14 the fact that "Quasi-judicial immunity for acts
15 performed is necessary to protect the court-
16 appointed examiners from lawsuits by allegedly
17 incapacitated person who were upset about the
18 results of what has happened to them." Meaning they
19 have been involuntary committed.

20 And that's the reason why someone like Dr.
21 Dodds or even in this case Dr. Mobley should have
22 that protection because they are being in a sense
23 forced to take this person and treat him or her
24 under a court-ordered mental health, mentally ill
25 order, and decide when it's going to happen when the

1 court in and of itself could keep that
2 responsibility.

3 And Your Honor, I submit to you, if Judge
4 Lawson had decided to keep Ms. Argoe in the hospital
5 for a specific period of 30 days that her only
6 recourse would have been was to sue, as she could
7 have and Mr. Davidson has said, sue with her court-
8 appointed attorney to get released earlier to have
9 another formal hearing.

10 In that case, I submit to Your Honor that
11 Dr. Dodds, if she had been under that 30 day court
12 order of specific treatment, would definitely have
13 judicial immunity. Because no one could get her out
14 of there until the court heard and ordered.

15 And there goes my argument again. The
16 court has transferred that authority to the doctor
17 to make that decision so there won't be an
18 additional formal hearing.

19 Your Honor, I found another case, Your
20 Honor, that is from another jurisdiction but I just
21 want to read it to you and what I think is the
22 problem about this and what is frightening to me if
23 I was a psychiatrist treating any involuntarily
24 committed patient in the state under a court order.

25 It says, "Both private and public

1 hospitals are faced with an extremely difficult task
2 of balancing the interest of a patient who would
3 benefit from permanent or periodic release. The
4 interest of society in treating mental illness and
5 returning the patient to a normal productive life,
6 in the interest of society and keeping dangerous
7 mentally ill persons off the streets.

8 The uncertainties inherent in analyzing
9 and treating the human mind let alone the decision
10 of when a person is cured and no longer a danger
11 renders the decisions of skilled doctors highly
12 discretionary and subject to rebuke only from the
13 most flagrant, capricious and arbitrary abuse."

14 Physicians such as Dr. Mobley and Dr.
15 Dodds can't have protection when they have been told
16 by a court that a patient is mentally ill and
17 adjudicated under a formal hearing with testimony
18 from doctors, nurses and family members. If they
19 don't have that I don't see where anyone, if this
20 court allows this case to go forward and it goes to
21 a jury, how any physician, psychiatrist in this
22 state or any state would ever take it upon him or
23 herself to go in there and treat patient knowing he
24 or she can be sued because they can go out.

25 And as you know, Your Honor, after all the

1 years on the bench, I can find an expert right now
2 and pay him or her a check that will say it's dark
3 in here, and be subject to a lawsuit. And that's
4 what is frightening to me, frightening to my client,
5 and that's where the judicial immunity comes in.

6 The other aspect of it, and I disagree
7 with Mr. Dodson, this statute 44-17-900 entitled
8 Officials Not Liable for Release or Discharge of
9 Patient. Your Honor, the only reason you see those
10 cases, if they exist under the statute, about
11 release, is because somebody goes out and gets hurt
12 because they have released them. And then of course
13 as in this case, somebody is second guessing what
14 should have been done.

15 As Mr. Cole just pointed out in a note to
16 me in one of the arguments, Dr. Dodds, Dr. Mobley,
17 anybody in this case is damned if you do and damned
18 if you don't. If we had released her the day after
19 Judge Mobley had decided she was mentally ill and
20 she had gone out and killed her husband, with the
21 gun that she carries on her hip, every day, then we
22 definitely would have had a lawsuit.

23 And we would be having a whole different
24 set of opinions from the experts in this case and
25 that would have been you never should have released

1 her, she was mentally ill, the court told you so.

2 So you can't win. And that's why this
3 statute from our legislature was established to say
4 "shall not be liable either civilly or criminally on
5 account of such participation in the discharge of
6 patients" which is what Dr. Dodds is doing. It
7 doesn't say about killing someone, or killing
8 themselves. It's any civil or criminal liability is
9 absolved by this statute because of a court order
10 through a probate court. And that's what Dr. Dodds
11 has.

12 Your Honor, finally, this apples and
13 orange thing was sort of absurd. It comes down to
14 if he wants to make this a medical malpractice case
15 so that we can come in and second guess everybody
16 that's under a court order to treat someone which if
17 I was a psychiatrist listening to his argument I
18 would never touch anybody and we'd even have more
19 mental health problems than we have in this country.

20 The problem is his own expert Dr. Davis --
21 my questioning of Dr. Davis was between pages 145
22 and 165 in the deposition. And I focused, because I
23 was fairly last in the six or seven hours we were
24 there so I didn't go over a lot of stuff, but I
25 specifically asked Dr. Davis what was wrong with

1 this case.

2 And I asked him, I said, "If Ms. Argoe was
3 mentally ill, as adjudicated by the court, did we do
4 everything correct?" And he said, "Yes." And I
5 said, "Was she harmed because we gave her
6 medication?"

7 He said, "No. In fact, she got medication
8 for another year when she was on the street and
9 could have gotten an attorney to stop that order
10 anytime she wanted to and she didn't."

11 And she took the medication voluntarily on
12 the street, Your Honor, for a year, same medication.
13 He said, "No, she was not harmed by that."

14 I asked him again, I said, "Was she harmed
15 by the fact that she was misdiagnosed?" He said,
16 "No."

17 "Does she have any permanent injuries?"

18 "No."

19 "Is she mentally ill?"

20 "No. She does not have an Access One
21 diagnosis according to Dr. Davis. She does have
22 access to, according to his testimony, that is she
23 is narcissistic, selfish, she is grandiose, and a few
24 other things, but they are not Access One.

25 And then I said, "So, what's the deal

1 here, what's the damage?" And he will say, "Because
2 she was falsely imprisoned and kept against her will
3 for 43 days."

4 And Your Honor, I submit to you, that the
5 imprisonment aspect of this case has been heard and
6 affirmed by our Supreme Court. We did not falsely
7 imprison her for those 43 days. Our Supreme Court
8 has said, no. There was a court order, she stayed
9 there, and as I read to you, she was treated
10 according to a court order for those days and cannot
11 be sued for imprisoning her.

12 So, Your Honor, in and of itself, through
13 the expert, there is no malpractice here. We did
14 not mistreat her.

15 Dr. Davis also said she was not abused.
16 He said, "Simply and solely she was kept against her
17 will imprisoned." And he used that word, for those
18 40 plus days.

19 I submit to you, that issue has been
20 adjudicated and gone. So there is no malpractice.
21 There is no oranges or apples or whatever you want
22 to say. It is strictly, she is in there. She
23 doesn't want to be in there, and now she is suing us
24 because she was.

25 Interestingly, Your Honor, it has nothing

1 to do with this motion for summary judgment. This
2 whole thing started out as a conspiracy between her
3 family and her husband and son and her sister and
4 brother and these doctors. And that got thrown out
5 too.

6 But when it comes right down to it, Your
7 Honor, she finally got a settlement with her
8 husband, son, and got back all the property they had
9 transferred to themselves when she sued the
10 attorney. And that was upheld by another Supreme
11 Court opinion, the second opinion, and it got
12 affirmed and that attorney is gone.

13 And they paid a significant amount of
14 money \$130,000 to get out of this case. And now she
15 wants to come back and claim more from us when the
16 whole basis, if you read this thing, the whole basis
17 of what these doctors did was listen to family
18 members including disinterested family members such
19 as her son that had her power of attorney.

20 So if there's apples and oranges here I
21 don't know what it is, Your Honor, but there is not
22 a medical malpractice case based on the deposition
23 testimony, it's own expert.

24 And clearly, Your Honor, again, our
25 Supreme Court said that if Three Rivers is treating

1 under a court order they get qualified judicial
2 immunity. Three Rivers can't treat anybody. As a
3 hospital they are representing Dr. Dodds and Dr.
4 Mobley and the nurses who had taken care of her.
5 Otherwise, no one would take care of these patients.

6 Again, the court transferred that
7 responsibility to the doctor instead of holding a
8 formal hearing after a specific period of time and
9 that's why Dr. Dodds should have legally -- legally,
10 I don't care what the facts are. Legally she should
11 have quasi-judicial immunity and be dismissed from
12 this case.

13 THE COURT: All right, any response to
14 this motion?

15 MR. DODSON: Your Honor, I'm stunned. I'm
16 stunned, I guess is the best word for it, that mr.
17 Parham would even try to stand up and try to make
18 the argument that he gets some sort of quasi-
19 judicial immunity. And I'm stunned because his
20 client, Dr. Dodds, had absolutely no involvement in
21 any of the probate court cases, none.

22 The statutes that he references pertain to
23 the designated examiners. So if there's any kind of
24 immunity, that immunity doesn't apply to his client.
25 At most it applies to Three Rivers and Mobley.

1 Now, how does he get from the fact that
2 his client had no involvement in this probate court
3 process. Well, he tried to sneak it in the back
4 door. And this is what he said, "That the Court can
5 transfer it's judicial authority to the doctor and
6 that's what it did when Dr. Dodds came in.

7 That is absolute and utter nonsense.
8 There is nothing in the probate code or any other
9 part of our law that says a judge can transfer the
10 judge's authority to a physician. That's not what
11 it says. It's not in there. It does not exist.
12 And that's what the whole lynch pin of his argument
13 on quasi-judicial immunity is.

14 I want to address something else too.
15 Which is, I said earlier this is a mis-diagnosis
16 case, and it is. It's a medical malpractice, what's
17 left is a medical malpractice misdiagnosis case.
18 That's why I amended the complaint to put that cause
19 of action in. And that's what we are talking about
20 here today.

21 They want to bring up little things and
22 throw little bombs over here about the gun. Well,
23 let me tell you about the gun. Let me tell you why
24 it's a misdiagnosis case. Because in the
25 application for involuntary commitment that her

1 husband completed he put that Martha Argoe carries a
2 gun on her hip. Well, that's true. She does. She
3 does carry a gun on her hip. She doesn't have it
4 here today because obviously we're in court.

5 But she also has a concealed weapons
6 permit issued by the State of South Carolina to
7 carry that gun on her hip. She is lawfully allowed
8 to do that.

9 THE COURT: How's that?

10 MR. DODSON: Because she has been issued a
11 concealed weapon permit by the State of South
12 Carolina.

13 THE COURT: How is it concealed if it's on
14 her hip?

15 MR. DODSON: Well, she conceals it.
16 Actually she keeps it in her purse. They said in
17 the application it's on her hip but she actually
18 keeps it in her purse.

19 THE COURT: Okay. I understand the
20 legislature was entertaining a bill to allow people
21 to carry guns on their hips.

22 MR. DODSON: I think they are. I am only
23 using that carried on her hip because that's what in
24 the involuntary commitment papers. And you know, I
25 guess I could carry a gun here if I had my jacket on

1 it would be concealed. But I don't have any guns so
2 that's not what--

3 But that's why it's a misdiagnosis case.
4 Because they didn't even scratch the surface with
5 this lady. Martha, do you have a gun? Yes, I do.
6 I was trained to carry a gun. I have a concealed
7 weapons permit. You want to see it?

8 They mentioned -- it may have been Mr.
9 Davidson or Ms. Ganes about hiding silverware.
10 Well, she did that. The reason she did that is
11 because her husband was stealing from her. That's
12 why she sued her husband and divorced her. But that
13 doesn't make her a danger to herself or other
14 people.

15 And that's exactly why I say this is a
16 misdiagnosis case. Because when you look at that
17 application for involuntary commitment and you
18 compare that to the medical records which is exactly
19 what our experts did, you don't have to look very
20 far to see that this lady is not mentally ill. This
21 lady is certainly not a danger to herself or other
22 people.

23 It's not like anybody every said she's
24 brandishing this gun, she has tried to shoot
25 somebody with the gun, she has tried to hurt herself

1 with the gun, she shot at somebody else, the police
2 have had to be called out to her house because she
3 is running around the yard waving a gun around at
4 her husband or neighbors. Nothing like that.
5 They didn't even scratch the surface.

6 Now, they keep throwing out these words,
7 res judicata and collateral estoppel, res judicata,
8 collateral estoppel, res judicata, collateral
9 estoppel. I address those arguments in detail in my
10 brief. But those two legal doctrines have
11 absolutely no application here at all.

12 Here's what the Supreme Court -- I'm
13 sorry, Court of Appeals has said about res judicata.
14 I am quoting, this is from Nelson vs. QHG of South
15 Carolina, Inc., 354SC290. "To establish res
16 judicata the defendant must prove three elements.
17 Identify of the parties, identity of the subject
18 matter, and adjudication of the issue in the formal
19 suit."

20 Okay, identity of the parties, before the
21 Supreme Court. They were not parties at the Supreme
22 Court. They weren't the respondent, they weren't
23 the appellant at the Supreme Court. Ms. Argoe was,
24 and that will satisfy the first criteria.

25 Identity of the subject matter. In Argoe

1 One, Ms. Argoe was suing a lawyer for legal
2 malpractice and some other causes of action. That
3 is not the subject matter of what we are here about
4 today.

5 In Argoe Two, it was in essence an attack
6 on the judicial process of the involuntary
7 commitment. We are not attacking the judicial
8 process. That's why they don't like my analogy of
9 apples and oranges but yet they keep talking about
10 apples. They keep talking about in detail about
11 judicial processes and statutes that don't exist
12 where a judge can transfer authority to a doctor.

13 We are not attacking the judicial process
14 at all. What we are doing is we are saying they
15 didn't diagnose her correctly and therefore they
16 didn't treat her correctly. That was never
17 adjudicated at all by the Supreme Court because
18 frankly at that time there wasn't even a cause of
19 action in the complaint for medical negligence and
20 for medical malpractice.

21 After I got involved when Jan Warner died
22 and I took over the case for him and it got remanded
23 from the Supreme Court and I got involved then, I
24 looked at the plate and I said this really needs to
25 be amended because it's not really the way you plead

1 a medical malpractice if that's what is left based
2 on the Supreme Court's order.

3 So none of those three elements for res
4 judicata apply. And I have outlined that in my
5 brief starting at page seven.

6 Then on collateral estoppel. Here's what
7 the Court of Appeals says on collateral estoppel.
8 The party asserting collateral estoppel must prove
9 that the issue was actually litigated -- actually
10 litigated. She has never litigated a malpractice
11 case against these defendants.

12 And directly determined in the prior
13 action. Neither one of the Supreme Court's opinion
14 in either Argoe One or Argoe Two dealt at all with
15 medical malpractice.

16 Res judicata and collateral estoppel at a
17 very basic level are about this. People get their
18 day in court but they only get one day in court.
19 Martha Argoe has never had her day in court for
20 medical malpractice against these defendants.
21 That's what we are here about today. She gets her
22 day in court. She has prosecuted this medical
23 malpractice case just like any other medical
24 malpractice case is prosecuted.

25 We've taken fact witness depositions. I

1 have disclosed experts, they have deposed my
2 experts, they have disclosed experts and I'm in the
3 process of deposing them. I have deposed some of
4 them but not all of them yet.

5 But that was never adjudicated by the
6 Supreme Court. And these defendants weren't even
7 parties to those two appeals. So they can throw out
8 this whole idea of res judicata and collateral
9 estoppel. When you read the Nelson case which I
10 cited in my brief those doctrines just don't have
11 any application for what is before you right now.

12 If I had tried to sue attorney Walsh again
13 or sue Psychiatric Solutions or something like that,
14 maybe. That's one of the reasons I dismissed
15 psychiatric solutions because they were a party in
16 Argoe Two.

17 So when the case got remanded I literally
18 let them out of the case. Not these defendants, not
19 these defendants, because Martha Argoe has never got
20 her day in court against them.

21 THE COURT: All right. Anything else?

22 MR. PARHAM: Two things. When you read
23 this Argoe opinion that has been handed up, and I'm
24 sure it's attached to all the briefs but I'll give
25 you a copy.

1 The court went through a lengthy
2 discussion about the facts of this case. And the
3 issues they were looking at in this case were
4 because Mr. Warner, Ms. Argoe's initial attorney,
5 chose only to appeal the dismissal of nine causes of
6 action against Site Solutions.

7 These same nine causes of action were pled
8 against my client and every other defendant in this
9 case. But if you look at the opinion, the court
10 went through the factual situation for Ms. Argoe's
11 care and said, "We disagree with appellant's..." Ms.
12 Argoe "...assertions that where involuntary
13 commitment was without actual basis." That is a
14 fact. That is a holding. That is a fact found by
15 the Supreme Court.

16 Mr. Dodson under whatever word he wants to
17 use, apples or oranges or whatever he wants to throw
18 out there, cannot replead that fact. Because this
19 case and these facts were same for my client as they
20 were for Site Solutions because we are all
21 defendants in the same case, the same dismissed
22 causes of action.

23 And the Supreme Court says that "We
24 disagree there's not a factual basis for her
25 commitment." And the factual basis for her

1 commitment, Your Honor, is mental illness, a harm to
2 herself or others.

3 And the court said there is a factual
4 basis and that same factual basis applies to any
5 person who was treating Ms. Argoe including Dr.
6 Dodds. They say she is mentally ill. So you cannot
7 challenge that fact.

8 And the second thing, Your Honor, is that
9 whatever you want to call it -- again, I will read
10 the statement. "Judge McMahon held that Three
11 Rivers is entitled to quasi-judicial immunity as it
12 was treating pursuant to an involuntary commitment
13 order.

14 And Three Rivers is a joint and several
15 defendant. Three Rivers can't treat anybody. It
16 treats through its nurses and physicians, such as
17 Dr. Dodds, and Mr. Dodson cannot go back and
18 relitigate that. It is a fact in a case. It comes
19 from my case.

20 There is no second bite at the apple and
21 our Supreme Court said these are the facts and these
22 are our holdings. And Dr. Dodds have quasi-judicial
23 immunity the same as Three Rivers because our
24 Supreme Court held there is no difference, Your
25 honor.

1 Finally, Your Honor, this whole commitment
2 was through 44-17-580. And then the statute that
3 says you can't be liable for release or discharge is
4 44-17-900, and it says, in fact, Your Honor, the
5 court order by Judge Lawson -- and if I may, Your
6 Honor, you may not know, Ms. Argue sued the judge in
7 this case and that got thrown out. So she was angry
8 about that too.

9 But in this case Judge Lawson said, "Shall
10 be committed to a state mental health facility for
11 inpatient care as provided under 44-17-580 as
12 amended. And then for one year.

13 Your Honor, the statute that says 44-17-
14 900 says "Neither the superintendent of a mental
15 health facility nor any other person legally
16 participating in the release or discharge of a
17 patient shall be liable either civilly or criminally
18 on account of such participating. It flows from the
19 same statute that is the authority for Judge Lawson
20 to put Ms. Argoe in the in-patient facility, i.e.,
21 Three Rivers, and be treated by its physicians, Dr.
22 Dodds and Dr. Mobley.

23 So not only do we have quasi-judicial
24 immunity pursuant to the Argoe Supreme Court
25 opinion, we also have no liability pursuant to a

1 statute of our legislature neither of which have
2 even been attacked by anybody in this case under the
3 orders and the appeals.

4 So Your Honor, I don't care whether he
5 thinks it's a malpractice case or not. His basis of
6 the malpractice case is we misdiagnosed her. We
7 didn't. The court did, if you can argue that, but
8 the court says she is mentally ill and we treated
9 her under a court order and we have immunity and we
10 have no liability by Supreme Court opinion and by
11 statute.

12 THE COURT: All right. Any other input
13 related to this motion?

14 MR. DODSON: Nothing further, Your Honor.

15 THE COURT: All right. What's the next
16 one?

17 MR. COLE: Your Honor, the last one is my
18 motion for summary judgment and I represent Three
19 Rivers which as you know is the facility where Ms.
20 Argoe was transferred and Nurse Burrell. I am going
21 to bifurcate that and address first Nurse Burrell.

22 First, every expert including plaintiff's
23 experts that have testified in this case, have
24 testified that the nurse cannot discharge anybody,
25 the nurse cannot prescribe anything, any

1 medications, and the nurse cannot do anything to try
2 to come up with a diagnosis for the patient. That
3 is clear across the board with everybody.

4 So that combined with the fact that Nurse
5 Burrell her only participation in this case, which
6 she was assigned as the designated examiner by the
7 court under the valid court order that you have
8 already heard talk about, and the last time she ever
9 saw Ms. Argoe or dealt with Ms. Argoe was at the
10 June 21, 2005 hearing when Judge Lawson then ordered
11 that there was the finding of the continued
12 necessary treatment and then discharge and treatment
13 for a year.

14 So out of everybody here or maybe even
15 more so because Nurse Burrell only had limited
16 capacity and she was clearly under the statute and
17 she was clearly covered under the Vaughn case, she
18 should be dismissed from this case. There should be
19 no question about that.

20 Plaintiff has an expert who is a nurse
21 from Texarcana whose testimony is her own personal
22 opinion. But since Nurse Burrell was only involved
23 in the involuntary commitment process as the
24 designated examiner to begin with when the
25 plaintiff's expert testified "I vacationed in South

1 Carolina once but I don't know what they do a
2 voluntary commitment in South Carolina." At that
3 point she had absolutely no qualifications
4 whatsoever to provide any opinion even if we have to
5 go there about what Nurse Burrell did or didn't do
6 in her capacity as the designated examiner."

7 So there is no evidence, there is no
8 factual basis, there is nothing to keep Nurse
9 Burrell in the case and she should be dismissed,
10 Your Honor.

11 With regard to Three Rivers, and I will
12 not belabor the point, but you heard testimony and
13 you have seen in the opinion, the Argoe Two opinion
14 where the Judge was talking about in Argoe Two,
15 about Psychiatric Solutions.

16 The difference between Three Rivers and
17 Psychiatric Solutions is Psychiatric Solutions
18 bought Three River, the facility, after Ms. Argoe
19 was discharged. The reason why I was not involved
20 in that appeal, that whole process, was because my
21 firm didn't get involved in this case until after
22 all those arguments were made and the case was
23 argued on appeal. So there's not a real
24 intervention into the process with that.

25 With regard to Robert's argument that it

1 was a different party, in fact, Three Rivers was
2 specifically named in the opinion and Three Rivers
3 was the facility and Psychiatric Solutions and Three
4 Rivers for this portion are the same thing.

5 So we are the same party and I think it's
6 clear based on the arguments you've heard before and
7 based on the Supreme Court's own findings that Three
8 Rivers has the quasi-judicial immunity in this case
9 and should not be involved in the case anymore and
10 should be dismissed.

11 I think in the same way they are arguing
12 that Three Rivers is out, the doctors should be out,
13 the same way the doctors are out Three Rivers should
14 be out because Three Rivers can only act through the
15 physicians who are in charge of the care.

16 I want to touch briefly on damages because
17 damages are a significant requirement for the
18 recovery of anything. We started out earlier this
19 morning about the medical malpractice case and you
20 have the same elements basically of any negligence
21 case. You have the duty, the breach of the duty and
22 the proximate cause of any due damages.

23 In this case, Dr. Davis testified
24 specifically and it was alluded to earlier on that
25 Ms. Argoe's only damages is she is mad as hell. And

1 that she spent some time at the facility. This goes
2 directly into one of the decisions that was raised
3 earlier about the false imprisonment claim that was
4 argued in the Argoe Two case.

5 And in the false imprisonment claim the
6 court dismissed that and the false imprisonment is
7 you're at a place where you shouldn't be. But the
8 court said that doesn't work.

9 They said, and I quote, "As previously
10 discussed, appellant was lawfully taken into custody
11 and detained pursuant to a valid probate court
12 order. It is generally accepted that a person
13 confined pursuant to an authorized mental health
14 commitment processing or process may not recover
15 damages in a false imprisonment action." And there
16 is more text, they are quoting from an Ander
17 citation.

18 But in this case the only damage, because
19 Dr. Davis her principle expert testified that she
20 has not suffered any physical problems, any mental
21 problems or anything else. Her only damages are she
22 was in the facility too long. And the Supreme Court
23 has already chimed in.

24 Call it apples, oranges, grapes, I don't
25 care what we call it, the Supreme Court has chimed

1 in and has created the law of the case. But that
2 question has been answered. We cannot relitigate it
3 now.

4 That's all I need to say, Your Honor,
5 unless you want something else.

6 THE COURT: Any response?

7 Mr. Dodson?

8 MR. DODSON: When I took Nurse Burrell's
9 deposition I was stunned at what she testified to
10 because I flat out asked her if Ms. Argoe met the
11 criteria for involuntary commitment. And those
12 criteria again, Your Honor, are that she has a
13 mental illness and because of that mental illness
14 she is a danger to herself or other people. Those
15 are the two criteria.

16 She testified at deposition that Ms. Argoe
17 did not meet either one of those criteria. I
18 couldn't believe it. I absolutely could not believe
19 it. Here's what she testified to. I asked the
20 question, this is on page 36 of Nurse Burrell's
21 deposition, "And you didn't believe at that time
22 that she was a danger to herself or other people?"

23 Answer, "Yes."

24 I couldn't believe it. On page 38 I said,
25 "You did not diagnose a mental illness

1 with Ms. Argoe?"

2 Answer, "No."

3 So then on page 37 she says, "Well, I'm
4 only a nurse I can only follow doctor's orders."

5 I -- how does she get any kind of immunity
6 when she didn't do her job? If she had done her job
7 she might be, she might get some immunity. Because
8 Mr. Cole is right, her only involvement was as a
9 designated examiner. But that was her role as a
10 designated examiner.

11 Does Ms. Argoe meet criteria one, does she
12 have a mental illness? Does she meet criteria two,
13 because of that mental illness she is a danger to
14 herself or other people?

15 If she had answered my questions, yeah, I
16 think she has a mental illness. Even if she was
17 wrong about that, she would probably get immunity.
18 If she had answered those questions, Yes, she was a
19 danger to herself or others. Yeah, that's why I
20 couldn't believe that she testified to that.

21 I mean, I commend her for her honesty that
22 she was just following doctors' orders and
23 everything, but she doesn't get any kind of immunity
24 when the immunity that she seeks is for being a
25 designated examiner, an independent examiner,

1 independent, and she doesn't do what she has been
2 instructed to do. That's not my expert saying that.
3 That's her own testimony.

4 Now, as to this idea that Three Rivers
5 gets out by piggy backing on another defendant and
6 the Supreme Court's opinion in Argoe One and Argoe
7 Two, Mr. Cole said it, he wasn't involved in that
8 case. They weren't a party to that case, they
9 didn't participate, they were not a respondent, they
10 were not an appellant to that case, they were not a
11 part of that Supreme Court opinion.

12 They don't get to claim collateral
13 estoppel or res judicata. That's an element of both
14 of those defenses. He flat out admitted that's not
15 -- that doesn't apply. Because he wasn't a party
16 there.

17 THE COURT: Anything else?

18 MR. COLE: Yes, Your Honor. I don't
19 understand that I'm not a party because it's my
20 facility and it's my name, Three Rivers, throughout
21 the whole thing, I don't understand that argument.

22 But the Vaughn case is pretty specific on
23 this point. It says, I'll just quote from parts
24 where they are talking about the common law
25 immunity. "In addition to preserving the

1 independent neutrality of the guardian ad litem a
2 grant of immunity also is reasonable in light of the
3 fact that many court-appointed guardians have not
4 volunteered for the position.

5 It's inequitable for persons who did not
6 ask to be appointed as guardian to be exposed under
7 limited liability because one of the guardian's
8 roles is to act as a representative of the court.
9 And because this role can only be fulfilled if the
10 guardian is not exposed to a constant threat of
11 lawsuits from disgruntled parties, a finding of
12 quasi-judicial immunity is necessary.

13 Such a grant of immunity is crucial in
14 order for guardians to properly discharge their
15 duties. Immunity to which guardian ad litem are
16 entitled is an absolute quasi-judicial immunity."

17 That's the court citing the guardians and
18 applying that to the designated doctors in the case.
19 And the court says, "We find the reasoning that
20 supports a finding of absolute quasi-judicial
21 immunity for court-appointed guardians..." And will
22 add designated examiners and other doctors in this
23 case. "...also supports a finding of absolute
24 quasi-judicial immunity for court-appointed
25 examiners and guardianships for seniors. Court-

1 appointed examiners are essentially an arm of the
2 judiciary."

3 And so we have case law, we have here the
4 Vaughn case that fits directly into this. Whether
5 or not the testimony as Robert was noting from Nurse
6 Burrell, in one part it doesn't matter because all
7 of what Nurse Burrell did was in front of Judge
8 Lawson the probate judge who then ordered and that
9 is the law of the case that she had a mental
10 deficiency that required her continued in-house
11 treatment and then the one year after the fact.

12 That's the law of the case. You can't
13 challenge it. If there was a problem with how Nurse
14 Burrell handled herself, which we deny. I mean,
15 accusing her of not being able to make a diagnosis
16
17 when she was not in a capacity to make a diagnosis
18 because she is a nurse and not a psychologist is a
19 bit of a misnomer.

20 But the time to attack that was when Judge
21 Lawson was having this hearing at the facility. And
22 you heard testimony from the different people
23 designated examiners who were able at that time to
24 listen to Ms. Argoe and her attorney and that's when
25 the court made that determination. Yes, she should

1 be here, she should be treated. And I think we can
2 just encompass the rest of the argument. I don't
3 need to go back and belabor those points.

4 THE COURT: Anything else?

5 MR. DODSON: Two things about Vaughn.
6 Here's what the Supreme Court holding in Vaughn
7 says, "We hold that a physician..." Not a nurse, a
8 physician. "...who is a court-appointed examiner in
9 a guardianship proceeding...."

10 Guardianship proceeding. We're not
11 talking about guardianship proceedings here. Vaughn
12 doesn't apply to Nurse Burrell in a matter that is
13 not a guardianship proceeding.

14 THE COURT: Anything else?

15 MR. COLE: Your Honor?

16 THE COURT: Yes, sir.

17 MR. COLE: This is my apples and oranges
18 argument here. The physician who has a different
19 level of training and the nurse works for the
20 physician, and you have a guardian that arguably has
21 less training, taking the nurse out of that mix from
22 Vaughn doesn't make any sense to me.

23 She is part of the same treatment, she is
24 part of the designation from the court as an
25 examiner not as a volunteer. She is designated by

1 the court and she should have the same protection
2 that the physicians who actually makes the
3 determination as to treatment, and so forth. I
4 don't see that as a distinction worth actually
5 arguing any more.

6 MR. DODSON: And he might have a better
7 claim than that if the clients had actually done
8 what the court wanted her to do which was to make an
9 independent evaluation but she didn't do that.

10 MR. PARHAM: Your Honor, just a note, all
11 those arguments were made by Mr. Warner, the
12 previous lawyer, in the motions that were heard five
13 years ago and it was not appealed so it's the law of
14 the case. All this independent stuff is not in the
15 case law in South Carolina.

16 Again, Vaughn also says that immunity
17 flows from the governing statute. It doesn't flow
18 from the guardianship, it flows from a governing
19 statute where a court appoints a certain examiner
20 and it even says, "...a physician or other mental
21 health practitioner." In this case a nurse.

22 The statute, in this case Vaughn says "A
23 psychiatrist or other mental health practitioner
24 enjoys immunity...." flows from the governing
25 statute of a court appointing that person to make an

1 examination.

2 So I don't care if it's a guardianship or
3 conservatorship or a mental health designation, the
4 Case Vaughn says you get the immunity. It says
5 nothing about the competence of the person doing it.
6 Maybe he needs to appeal that.

7 THE COURT: Anything else?

8 MR. DAVIDSON: I have slight egg on my
9 face. As I was sitting here going back over Judge
10 Milling -- this case in 2008 was heard I think by
11 Judge McMahon and then Judge Milling at another
12 time. I think I -- reversed, I can't remember.

13 But in looking at Judge Milling's order
14 and it's the order Judge Milling did June 27, 2008.
15 And this is the order in regard to Dr. Hooker who
16 was the first physician I represented, Dr. Mobley,
17 he cleaned up the pleadings and basically got it
18 down to where we are today.

19 But Judge Milling, on page 16 of his order
20 said, "I find that Dr. Mobley is entitled to
21 absolute quasi-judicial immunity as a court-
22 appointed official for the reasons set forth in
23 Vaughn.

24 I apologize, I was reading this order
25 again and if I had seen that I could have cut my

1 argument about five minutes shorter. So that is the
2 law of the case in this instance.

3 THE COURT: What, entitled to what, repeat
4 it again. Entitled to what?

5 MR. DAVIDSON: Quasi--

6 THE COURT: Absolute what?

7 MR. DAVIDSON: Absolute quasi judicial
8 immunity as a court-appointed physician for the
9 reasons stated in Vaughn. What we've been arguing.
10 I had argued it once and didn't realize it. I
11 apologize.

12 MR. DODSON: May I address that, Your
13 Honor?

14 THE COURT: Sure.

15 MR. DODSON: At that point Jan Warner was
16 attacking the process and was attacking the opinions
17 that Mobley made in the probate court proceeding.
18 He was not attacking the standard of care either
19 before that or after that order.

20 What he was doing was attacking the
21 opinions that she gave in open court. And so, Judge
22 Milling's order addresses those opinions in open
23 court. That's why I keep -- they want to make fun
24 of me and talk about tangerines and grapes and
25 whatever else because of my analogy.

1 But that's why I kept making the analogy
2 apples and oranges because what we are prosecuting
3 here is a medical malpractice action. Not because
4 of something that Mobley said in court or Dodds said
5 in court or didn't say in court or anything like
6 that. But because as physicians you have a duty to
7 discharge a patient when they don't need care and
8 treatment and they just blew that. That's basically
9 what our expert witness said.

10 And, yes, is Ms. Argoe mad as hell? Darn
11 tooting she is. I would be too if I was locked up
12 for six weeks of my life because somebody said I saw
13 witches and warlocks. Because somebody says I carry
14 a gun on my hip and I have a concealed weapons
15 permit for it.

16 But if any of these nurses, any of these
17 physicians had just barely scratched the surface
18 with regard to care or treatment they would see she
19 doesn't have a mental disorder, they would have seen
20 she's not a danger to herself or other people. They
21 would have discharged her, they didn't do that.

22 MR. PARHAM: If you can make a statement
23 in open court under oath that you think somebody is
24 mentally ill and you can't be sued for it and then
25 the court says she is mentally ill and says go treat

1 her. And you make the same statement you've made
2 under oath because you say she is mentally ill but
3 this guy can sue now? I find that a little
4 unethical and not very fair.

5 And that would be absurd to think you can
6 say one thing and say the same thing in another area
7 where the court says yes, mentally ill and go treat,
8 and you don't get that protection. No one would
9 ever treat a mentally ill involuntarily committed
10 patient under a court order ever. And that's what
11 this case will establish.

12 So I can't -- again, I don't understand
13 the apples and oranges--

14 MR. DODSON: Judge, it's not a jail
15 sentence. When you are involuntarily committed it's
16 not a jail sentence. You are not being punished. A
17 doctor has to make a determination about when to
18 release you and they do that using their
19 professional judgment as a psychiatrist and as a
20 physician.

21 When you do that you're subject just like
22 any other physician is subject to a medical
23 malpractice action. I mean, it's really that
24 simple. It's a medical malpractice action. We are
25 not saying that she can't testify in court about

1 whatever she wants to testify about and what not.

2 And I see Mr. Cole is up, like a jack in
3 the box, over there. I know he's going to say
4 that's what Burrell did. That's what Nurse Burrell
5 did as a designated examiner.

6 But if he had actually -- if she had
7 actually taken her appointment and done and
8 independent evaluation of Ms. Argoe then I would say
9 yeah, she gets out of the case. I would have
10 voluntarily dismissed her from the case like I
11 voluntarily dismissed three others from the case.

12 But what she did is she said I'm just
13 following doctor's orders. That's not what the
14 court told her to do. She can't claim judicial
15 immunity when she doesn't do what the judiciary told
16 her to do. And what she represented to the
17 judiciary she did.

18 THE COURT: What's the phrase, part of the
19 phrase absolute? Is there any kind of analogy
20 similar to the tort claims act where somebody has
21 immunity but they can be sued if they exercised
22 their role in a grossly negligent matter?

23 Mr. Dodson is on his feet. I will give
24 Mr. Dodson the opportunity if he wants to address
25 it. Is there anything in the case law that talks

1 about if you exercise your role in a grossly
2 negligent manner, that you are subject to suit.
3 Again, I realize it's a different context.

4 MR. DODSON: Right.

5 THE COURT: Different statutes. But is
6 there anything in the law because what you all have
7 been referring to is using the word absolute.

8 MR. DODSON: To answer Your Honor's
9 question, I am not aware of any case law that makes
10 a distinction between absolute quasi-judicial
11 immunity and quasi-judicial immunity in the sense
12 that Your Honor was talking about.

13 Like, does absolute judicial immunity
14 protect you from negligence and gross negligence
15 whereas quasi-judicial immunity would only protect
16 you from negligence but not gross negligence.

17 I am not sure why, I think they may be
18 using the word absolute just as an adjective to try
19 to, you know, add a little pepper and hot sauce to
20 their argument. But I don't know--

21 THE COURT: That they were reading that
22 from the opinion.-

23 MR. DODSON: I don't know that that
24 adjective really has any legal--

25 THE COURT: I'm sorry.

1 MR. DODSON: I'm through.

2 THE COURT: Go ahead, finish.

3 MR. DODSON: I don't know that that
4 specific word means anything different than if that
5 one word had been left off if they had just said
6 quasi-judicial immunities opposed to absolute quasi-
7 judicial. I mean, I'm not aware that there's a
8 distinction between absolute and quasi-judicial
9 immunity.

10 THE COURT: Well, immunity for judges
11 under the Tort Claims Act probably doesn't relate to
12 gross negligence either. You pretty much have to be
13 acting without any jurisdiction in order to be
14 subject to suit.

15 Anybody else have anything? I may be
16 taking you all afield from where we need to be. I
17 apologize if I am.

18 MR. DAVIDSON: I've got two points.
19 Number one, all this about the release and keeping
20 her too long and her being mad is really false
21 imprisonment. In regard to Dr. Mobley, false
22 imprisonment can be in a commitment process where
23 people are held too long without lawful authority.

24 And in Dr. Mobley's case, the judge, Judge
25 Milling acknowledged and ordered that the false

1 imprisonment case with Dr. Mobley was dismissed with
2 prejudice. That was done by consent, the false
3 imprisonment.

4 Going to your immunity argument, because
5 I'm a geek and a history major from Wafford, I can
6 tell you why. Quasi-judicial immunity or
7 discretionary immunity was first espoused in those
8 terms in a case called Long vs. Seabrook.

9 In Long vs. Seabrook it dealt with the way
10 records were produced by a tax assessor down in
11 Charleston, J. C. Long. And the court basically
12 said that as long as in a decision-making process a
13 public official was not acting with malice and bad
14 faith or corruption, you couldn't sue them.

15 So if you could prove malice, corruption
16 or bad faith, even in a discretionary hearing, you
17 could sue the public official. If you take that
18 case and look at the history of that case and the
19 prior cites it goes actually back to a judicial
20 case. It goes back to the case of a coroner. And
21 the court said when you are dealing with judges and
22 coroners and magistrates the decisions you all make
23 are absolutely immune from suit.

24 But the idea of absolute discretionary
25 immunity means we're not looking at good faith,

1 we're not looking at corruption, bad faith or
2 malice. We are acknowledging just like a judge
3 because in this instance being appointed by a judge
4 to act in a judicial capacity, that individual is
5 cloaked with the absolute judicial immunity, quasi-
6 judicial immunity because they are not a judge.

7 They are cloaked with the absolute
8 immunity the way a judge would have in making
9 decisions in regarding the proceedings they are
10 appointed. So that's the distinction in that
11 instance.

12 That's also why you have, and I can't
13 remember the case name, there was a case that
14 basically said common-law judicial immunity still is
15 alive and well in South Carolina. Using my most
16 favorite word, disirregardless of the Tort Claims
17 Act.

18 Because the Tort Claims Act says you know
19 you've got absolute immunity, judges do, but then
20 you've got that old Stroman case where the Supreme
21 Court in its infinite wisdom said if you plead
22 anything else that's got a gross negligence standard
23 then you should apply the gross negligence standard
24 to all of the provisions.

25 I've tried several times on appeals to

1 explain to the Supreme Court what you've done, when
2 a judge decides to release an individual on
3 probation -- not probation, on bond. That's dealing
4 with supervision of an inmate or prisoner under 25,
5 that's a gross negligence standard.

6 You don't want a gross negligence standard
7 to be applied to that in regard to judicial
8 immunity. So basically they in-roned and said
9 common law judicial immunity still applies. So
10 that's the history lesson today on quasi-judicial
11 immunity.

12 THE COURT: Mr. Cole, do you have
13 something else?

14 MR. COLE: Yes, Your Honor, let the record
15 reflect I did not jump up. Earlier I was standing
16 up for Robert.

17 I just want to point out that Robert wants
18 to argue to compartmentalize that he says all we
19 have now is a medical negligence claim. Whatever
20 argument he gets he brings it back to false
21 imprisonment. He brings it back to these other
22 claims. And if you read the first sentence out of
23 his brief he talks about conspiracy. And all of
24 those are claims that are gone.

25 Argoe Two dismissed them, and all they are

1 asking for is claims that are no longer around and
2 the whole case now should be disposed of.

3 THE COURT: I haven't had a chance to read
4 all the materials that you all have provided and I
5 need a chance to do that. But this side of the room
6 keeps talking about the expert in Atlanta limited
7 the plaintiff's damages simply to being upset.

8 But I don't get to pick and choose at a
9 summary judgment level --

10 Mr. Dodson, what is you client saying her
11 damages are?

12 MR. DODSON: The only analogy between this
13 case and a false imprisonment case is that the end
14 result is the same. She was locked up involuntarily
15 for six weeks of her life. And so that, to answer
16 Your Honor's question, that is one of her damages.

17 The other damage that she had is she was
18 force fed medication that she did not want or need.
19 And you know, whether that and whether I can prove
20 that because she was given that medication she has
21 any permanent injuries as the result of that. Is
22 it--

23 THE COURT: The extent of the injuries is
24 not the inquiry for me, at this point. But if she
25 was required to purchase medications that she did

1 not need, even if it was nine bucks for a generic,
2 at summary judgment stage it doesn't matter if we
3 are talking about nine dollars or nine million
4 dollars.

5 MR. DODSON: Right.

6 THE COURT: As far as the damage arguments
7 I've heard, again, I'll have to read through all
8 these materials but just because an expert said her
9 damages are one thing I don't stop there. I have to
10 look and see if there is any evidence in the record
11 on the issue of damages.

12 Based on the arguments I am hearing that's
13 not where the real contest is going to be. It's
14 going to be somewhere else.

15 MS. GANES: And Your Honor, as to Dr.
16 Steiner, he didn't prescribe any medications for
17 her. He didn't do anything but show up and visit
18 with her pursuant to the court order that brought her
19 there and she left the next day. She didn't take
20 any medication at Three Rivers, he didn't prescribe
21 anything, nobody testified that they relied on him
22 for anything.

23 She leaves him and then she goes and gets
24 judicially committed beyond the way she already was.
25 Beyond the initial commitment order. Dr. Steiner

1 didn't have anything to do with that.

2 THE COURT: Did they bill her?

3 MS. GANES: You know, I don't know the
4 answer to that.

5 THE COURT: You all talked about
6 insurance. I am assuming that a bill went out.

7 MR. DODSON: They billed her insurance.
8 In fact, when her insurance ran out that's when they
9 -- magically, she went from being--

10 MR. PARHAM: This is so wrong I can't
11 stand it. I am going to stand up. I am stunned.
12 That's a falsehood, an absolute falsehood, Judge.

13 If that was true he wouldn't have let
14 Carolina Health Care Plan out.

15 MR. DODSON: I let Carolina Health Care
16 Plan out because after looking at the arguments Mr.
17 Hicks was going to make I decided, you know what, he
18 is right. I can't sue an insurance company for
19 paying a bill. I don't think there's a cause of
20 action for that in South Carolina. After conferring
21 with her we had to let them out.

22 That has nothing to do with the fact that
23 these doctors and nurses had a client that had good
24 insurance and by God they were going to hold onto
25 that client and milk this thing like a Holstein cow,

1 which is exactly what they did.

2 That's not just my opinion. That's the
3 opinion of my expert because he testified at the
4 deposition that he couldn't find any basis in any of
5 the records or depositions of fact witnesses
6 including these defendants that would have justified
7 keeping her.

8 And in his opinion the only reason they
9 did it was to milk the insurance. So that's not
10 just me standing up in court making those
11 assertions.

12 MS. GANES: Your Honor, that's not
13 admissible testimony at all.

14 MR. PARHAM: And I can tell Your Honor
15 right now Dr. Dodds made less than a thousand
16 dollars and she has been in this lawsuit for seven
17 years. So if we were keeping her in there to make
18 twenty dollars a day or whatever she being paid then
19 I can't wait to try this case. You are going to
20 enjoy it for two weeks.

21 MR. DODSON: Three Rivers made a nice tidy
22 sum on this.

23 MR. PARHAM: Well, then let me out.

24 MR. DODSON: So.

25 THE COURT: I apology for taking you all

1 down this road. I did want to make a point just
2 because we are at a summary judgment stage. We are
3 not at a decision on the merits.

4 Now, quite frankly, this immunity issue is
5 something I'm going to have to read as much as I can
6 read and I may have some more questions for you all.
7 If I do, I'll just start by circulating or giving
8 you directions through email.

9 I appreciate your time today. Thank you
10 very much.

11 MR. DODSON: Thank you, Your Honor.

12 MR. PARHAM: Your Honor, we are still on
13 for October 14th, if we don't get dismissed, right?

14 THE COURT: Right.

15 MR. PARHAM: There isn't any problem with
16 that, correct?

17 THE COURT: Not that I'm aware of.

18 MR. PARHAM: Okay, thank you.

19 --END OF TRANSCRIPT OF RECORD--

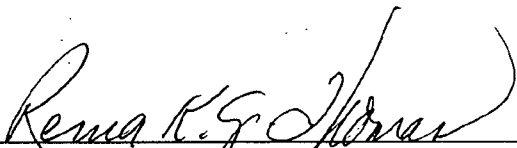
STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

COURT REPORTER'S CERTIFICATION

I, REMA K. GANTT THOMAS, OFFICIAL COURT
REPORTER, AND NOTARY PUBLIC IN AND FOR THE STATE OF
SOUTH CAROLINA, DO HEREBY CERTIFY THAT THE FOREGOING
IS A TRUE, ACCURATE AND COMPLETE TRANSCRIPT OF
RECORD OF THE PROCEEDINGS HAD AND EVIDENCE
INTRODUCED IN THE ABOVE-CAPTIONED CASE ON AUGUST 29,
2013, IN LEXINGTON, SOUTH CAROLINA.

I FURTHER CERTIFY THAT I AM NEITHER OF COUNSEL
NOR KIN TO ANY OF THE PARTIES TO THIS CAUSE OF
ACTION, NOR AM I INTERESTED IN ANY MANNER IN ITS
OUTCOME.

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND
AND SEAL AT CHAPIN, SOUTH CAROLINA, THIS THE
NINETEENTH DAY OF AUGUST, 2014.


REMA K. GANTT THOMAS
OFFICIAL COURT REPORTER

STATE OF SOUTH CAROLINA) COURT OF COMMON PLEAS
COUNTY OF LEXINGTON) C/A #: 2007-CP-32-1981

Martha Lewin Argoe,
Plaintiff,

v.

Three Rivers Behavioral Health,
LLC, and Psychiatric Solutions,
Inc., Its Successor; Phyllis
Bryant-Mobley, M.D.; Glenn Hooker,
M.D.; Aiken Regional Medical
Center; Aurora Pavilion; David A.
Steiner, M.D.; Cheryl C. Dodds,
M.D.; Doris Ann Burrell, R.N.,;
and Carolina Care Plan,

Defendants.

(COPY)

DEPOSITION OF
MARTHA LEWIN ARGOE

Wednesday, May 2, 2012
10:09 a.m. - 6:04 p.m.

The deposition of MARTHA LEWIN ARGOE, taken on behalf of the Defendant Cheryl C. Dodds, M.D., at Creel Court Reporting, 1230 Richland Street, Columbia, South Carolina, on the 2nd day of May, 2012 before Andrea R. Taylor, Court Reporter and Notary Public in and for the State of South Carolina, pursuant to Notice of Deposition and/or agreement of counsel.

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(803) 252-3445 / (800) 822-0896

APPEARANCES:

Robert D. Dodson, Esquire
LAW OFFICES OF ROBERT DODSON, PA
1722 Main Street, Suite 200
Columbia, South Carolina 29201
Rdodson@RdodsonLaw.com
Attorney for the Plaintiff

Andrew N. Cole, Esquire
COLLINS & LACY, PC
1330 Lady Street, Sixth Floor
Columbia, South Carolina 29201
acole@collinsandlacy.com
Attorney for the Defendants, Three Rivers
Behavioral Health, LLC and Doris
N. Burrell, R.N.

Andrew L. Richardson, Jr., Esquire
McANGUS, GOUDELOCK & COURIE, LLC
1320 Main Street, 10th Floor
Columbia, South Carolina 29201
drew.richardson@mgclaw.com
Attorney for the Defendant, Psychiatric
Solutions, Inc.

William H. Davidson, II, Esquire
DAVIDSON & LINDEMANN, PA
1611 Devonshire Drive, 2nd Floor
Post Office Box 8568
Columbia, South Carolina 29202-8568
wdavidson@DML-LAW.com
Attorney for the Defendants,
Phyllis Bryant-Mobley, M.D.
and Glenn Hooker, M.D.

Shelton W. Haile, Esquire
RICHARDSON, PLOWDEN, CARPENTER & ROBINSON, PA
1900 Barnwell Street
Columbia, South Carolina 29201
shaile@rpcrlaw.com
Attorney for the Defendants, Aiken
Regional Medical Center and Aurora Pavilion

Elloree A. Ganes, Esquire
HOOD LAW FIRM, LLC
172 Meeting Street
Post Office Box 1508
Charleston, South Carolina 29401

Ellore.Ganes@hoodlaw.com
 Attorney for the Defendant,
 David A. Steiner, M.D.

James E. Parham, Jr. Esquire
 ATTORNEY AT LAW
 220 Ministry Drive
 Irmo, South Carolina 29063
iparham@iparhamlaw.com
 Attorney for the Defendant,
 Cheryl C. Dodds, M.D.

Noah M. Hicks, Esquire
 THE LAW OFFICE OF NOAH M. HICKS, II, LLC
 Post Office Box 7996
 Columbia, South Carolina 29202
chicks@nmhlawfirm.com
 Attorney for the Defendant,
 Carolina Care Plan

Also present:
 Lois T. El, RN, MSN
 Aiken Regional Medical Centers

Renee Bouye
 Carolina Care Plan

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CREEL COURT REPORTING, INC.
 1230 Richland Street / Columbia, SC 29201
 (803) 252-3445 / (800) 822-0896

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STIPULATIONS

It is stipulated and agreed that this deposition is being taken pursuant to the South Carolina Rules of Civil Procedure.

It is stipulated by and between counsel and the witness that the reading and signing of the following deposition be, and the same are, hereby waived.

CREEL COURT REPORTING, INC.

1230 Richland Street / Columbia, SC 29201

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1 **MARTHA LEWIN ARGOE**, having been duly sworn, deposes
2 and testifies as follows:

3 **MS. ARGOE - EXAMINATION BY MS. GANES:**

4 Q: Thank you, Ms. Argoe. My name is Elloree
5 Ganes, and we've met off the record. I
6 represent Dr. Steiner, David Steiner, in the
7 lawsuit that you have filed against several
8 defendants related to your involuntary
9 commitment back in June of 2005. It's been
10 several years. I understand that you have
11 given a deposition before today. Is that
12 right?

13 A: Yes.

14 Q: Okay. How many times have you been deposed?

15 A: Once.

16 Q: Okay. And I'm required to tell you a few
17 things before we get started, but you probably
18 heard them in your other deposition. If you
19 need to take a break for any reason today,
20 please let us know that. Whichever lawyer is
21 asking you questions, just tell us you need to
22 take a break. We don't need to know why. We
23 can do that as often as you would like. This
24 is not an endurance contest. You, I assume,
25 have had an opportunity to meet with your

1 lawyer and prepare for the deposition; is that
2 right?

3 A: Yes.

4 Q: And throughout the deposition, please don't
5 tell any lawyer anything that you have spoken
6 to your lawyer about, and I'm sure he'll make
7 those objections if it seems like you're going
8 in that direction. If you don't understand any
9 of my questions, will you please tell me that?

10 A: (Nods head affirmatively.)

11 Q: Is that a yes?

12 A: Yes.

13 Q: That way when we look back at the record for
14 the trial of this case, we will know that you
15 understood the question that was being asked
16 before you answered; is that fair?

17 A: Yes.

18 Q: All right. And if you don't understand, just
19 tell us and we'll ask a different question or
20 ask it in a better way, but don't answer a
21 question until you understand what is being
22 asked, okay?

23 A: Yes.

24 Q: And if you'll answer all the questions out loud
25 instead of by shaking or nodding your head,

1 that helps the court reporter to take down all
2 of the responses, okay?

3 A: Yes.

4 Q: And please, this is hard in a deposition
5 because in natural conversation you might
6 anticipate the question that's being asked, or
7 the lawyer may anticipate your answer. Please
8 make sure that the question has been completed
9 before you start to answer, and if you forget
10 to do that your lawyer or another lawyer may
11 remind you. And the lawyers also forget to do
12 it. So if I begin another question before you
13 have completed your answer, or any lawyer,
14 please just tell us that so that we know that
15 we get your complete response to our question.
16 Okay?

17 A: Yes.

18 Q: All right. Now, is there any reason that today
19 is not a good day for you to give your
20 deposition in this case?

21 A: None that I know of.

22 Q: Okay. Have you taken any medication today?

23 A: My medicine that I take for diarrhea.

24 Q: Okay.

25 A: I take it three times a day.

1 Q: Is that the only medication that you've taken?
 2 A: Vitamin.
 3 Q: Okay.
 4 A: My hormone that I take every day of my life.
 5 Q: Okay.
 6 A: And fish oil, that's about it.
 7 Q: All right. Now, are you under the influence of
 8 any other substance, drug, or alcohol that
 9 would affect your ability to answer our
 10 questions truthfully?
 11 A: No.
 12 Q: Is there any reason that your memory may be
 13 impaired today in a way that it wouldn't be
 14 impaired in a year or so when a jury is present
 15 when we try the case?
 16 A: No.
 17 Q: All right. What is your full name, please?
 18 A: Martha Lewin Argoe.
 19 Q: Have you ever been known by any other name?
 20 A: No.
 21 Q: Your maiden name is Lewin?
 22 A: Yes.
 23 Q: And you were married in 1964; is that right?
 24 A: Four or five.
 25 Q: Okay.

1 A: It was August 22nd.

2 Q: All right.

3 A: The exact year --

4 Q: In the '60s?

5 A: Yeah. Yes.

6 Q: Now, have you been married since that marriage

7 --

8 A: No.

9 Q: -- to George Argoe, George Lewis Argoe, Jr.?

10 A: No.

11 Q: All right. Have you ever been known by any

12 aliases or nicknames?

13 A: No.

14 Q: Do you have any children?

15 A: Yes.

16 Q: How many?

17 A: One.

18 Q: And that's George Lewis, III?

19 A: Yes.

20 Q: What is your date of birth?

21 A:

22 Q: Where were you born?

23 A: Claremont, New Hampshire.

24 Q: And how long did you live in New Hampshire

25 after birth?

- 1 A: Until I was 16 years old.
- 2 Q: And when you were 16, what caused you to move
- 3 from Claremont?
- 4 A: My father moved the whole family to Crescent
- 5 Beach, South Carolina.
- 6 Q: Okay. And did you attend high school at
- 7 Crescent Beach?
- 8 A: Yes.
- 9 Q: Did you graduate?
- 10 A: Yes.
- 11 Q: What year did you graduate?
- 12 A: Not sure.
- 13 Q: Okay. What was the name of the high school?
- 14 A: Wampee Little River.
- 15 Q: And what was the reason for the family's move
- 16 to Crescent Beach?
- 17 A: My father was a physician, and he had suffered
- 18 a coronary from overworking in New Hampshire.
- 19 So he came to Crescent Beach, started a little
- 20 family practice.
- 21 Q: And what type of physician was he?
- 22 A: A surgeon.
- 23 Q: What type of surgery?
- 24 A: General surgery.
- 25 Q: Did your mother work outside the home?

- 1 A: No.
- 2 Q: What was your mother's highest level of
3 education?
- 4 A: Medical technologist.
- 5 Q: So she had completed high school and gone to
6 some technical training?
- 7 A: Yes. Temple University.
- 8 Q: Now, after you graduated from high school, did
9 you go on to further your education?
- 10 A: Yes.
- 11 Q: And what did you do?
- 12 A: The University of South Carolina.
- 13 Q: And what did you study at USC?
- 14 A: The School of Business.
- 15 Q: Did you graduate?
- 16 A: No.
- 17 Q: How many years did you finish?
- 18 A: Two.
- 19 Q: Did you get any certifications or associate's
20 degree?
- 21 A: No.
- 22 Q: And have you gone back to any academic ventures
23 since you left the University of South
24 Carolina?
- 25 A: No.

1 Q: What was the reason that you left the
2 University of South Carolina as a student?
3 A: Got married.
4 Q: Okay. Do you have any siblings?
5 A: Brother.
6 Q: And that's Read?
7 A: (Nods head affirmatively.)
8 Q: And is Read still practicing medicine?
9 A: Yes.
10 Q: Where does he practice?
11 A: In Bluffton, South Carolina.
12 Q: What's the name of his practice in Bluffton?
13 A: I don't know.
14 Q: What type of medicine does he practice?
15 A: ENT.
16 Q: When did he move down to Bluffton?
17 A: I don't know.
18 Q: Do you have a relationship with Read?
19 A: No.
20 Q: Okay. Is the reason that you don't have a
21 relationship with Read related to your
22 commitment in 2005?
23 A: Yes.
24 Q: And we'll come back to that. Is he still
25 married to Donna?

- 1 A: Donna is my sister.
- 2 Q: I'm sorry. Okay. Is that the only sister you
- 3 have?
- 4 A: Yes.
- 5 Q: What's Read's wife's name?
- 6 A: Read is divorced.
- 7 Q: Is his former spouse in South Carolina?
- 8 A: He has three former spouses.
- 9 Q: Okay. Where do they live?
- 10 A: One is in -- two in Beaufort, and one in
- 11 Nichols, South Carolina, the last I knew.
- 12 Q: Now, where does Donna live?
- 13 A: In Beaufort.
- 14 Q: And do you have a relationship with Donna?
- 15 A: No.
- 16 Q: Is the reason that you don't have a
- 17 relationship with Donna related to your
- 18 commitment in 2005?
- 19 A: Yes.
- 20 Q: Now, is Donna married?
- 21 A: Yes.
- 22 Q: What's her husband's name?
- 23 A: Eddie Powell.
- 24 Q: Powell?
- 25 A: Powell.

1 Q: Does Donna work outside the home?

2 A: No.

3 Q: Has she ever?

4 A: Yes.

5 Q: What was her occupation?

6 A: She worked for PanAm, Eastern Airlines before
7 they --

8 Q: What was her job with PanAm and Eastern?

9 A: PanAm, she was a troubleshooter in the office.
10 Eastern, she flew.

11 Q: As a pilot or as a stewardess?

12 A: No, as a stewardess.

13 Q: Anybody else in here would have just asked you
14 if it was a stewardess. When was the last time
15 that you spoke --

16 **MR. DODSON:** Objection.

17 Q: -- with Read?

18 **MR. PARHAM:** And they call them flight attendants.
19 Thank you.

20 Q: When was the last time that you spoke with
21 Read?

22 A: I don't remember.

23 Q: Have you spoken with Read since you were
24 released from the commitment in 2005 that's the
25 subject of this lawsuit?

- 1 A: Once that I recall.
- 2 Q: And when was that?
- 3 A: That was when I was forced drugged for that one
- 4 year, and he came in to where I was staying in
- 5 my property with his two children.
- 6 Q: Okay.
- 7 A: And there was basically no conversation.
- 8 Q: Okay. What was the reason that he came to your
- 9 property?
- 10 A: The boat he had was in the slip in front of the
- 11 marina, and he and the two children came in, I
- 12 guess the children wanted to see, wanted to
- 13 come in.
- 14 Q: Come in, was it to your home?
- 15 A: To my home.
- 16 Q: Okay. Did they come to visit, or do you know?
- 17 A: Visit, I think.
- 18 Q: How old were the children?
- 19 A: Gosh, I don't know.
- 20 Q: How many children does Read have?
- 21 A: Two.
- 22 Q: Do you know how old they are now?
- 23 A: One more or less 18 and the other one has not
- 24 finished high school yet.
- 25 Q: Is that a son or a daughter?

- 1 A: Two sons.
- 2 Q: Okay. Does Donna go by Powell?
- 3 A: She does.
- 4 Q: Now, Eddie Powell, what is his occupation?
- 5 A: Contractor.
- 6 Q: And is he still in Beaufort?
- 7 A: Yes.
- 8 Q: When is the last time that you spoke with
- 9 Donna, your sister?
- 10 A: I don't remember.
- 11 Q: Was it since your commitment in 2005?
- 12 A: Probably not.
- 13 Q: Okay. Do Eddie and Donna have children?
- 14 A: No.
- 15 Q: No children in that marriage?
- 16 A: No children.
- 17 Q: And those are your only two siblings?
- 18 A: Yes.
- 19 Q: What's your current address?
- 20 A: 100 Factory Creek Court, Beaufort, South
- 21 Carolina 29907.
- 22 Q: How long have you lived there?
- 23 A: Since 2010.
- 24 Q: Does anyone live there with you?
- 25 A: No.

- 1 Q: Are you currently involved romantically with
- 2 any significant other?
- 3 A: No.
- 4 Q: When was the last time that you were?
- 5 A: After the divorce, for about two months.
- 6 Q: Okay.
- 7 A: With an attorney I had known a long time from
- 8 Florida.
- 9 Q: What was his name?
- 10 A: Robert Nixon.
- 11 Q: And what was the reason that that relationship
- 12 ended?
- 13 A: He wanted to go to Florida and raise his
- 14 grandchildren.
- 15 Q: Okay. Was he up here?
- 16 A: Yeah.
- 17 Q: And so he left to go back to Florida?
- 18 A: Yeah, I don't know what he did. I don't know
- 19 what he did.
- 20 Q: Okay.
- 21 A: I have no idea.
- 22 Q: Did he ever live in your home or you in his?
- 23 A: I don't know that he lived there. I don't know
- 24 that.
- 25 Q: Okay. Did you and Robert Nixon ever live

1 together?

2 A: Not really.

3 Q: Now, when were you divorced?

4 A: In October 2007.

5 Q: And was that divorce finally resolved on a
6 grounds, or was it just that you two were
7 living separately and apart for more than a
8 year?

9 **MR. DODSON:** Object to the form.

10 Q: What were the final grounds, if there was one,
11 for the divorce from George Argoe?

12 **MR. DODSON:** Objection. You can answer if you know.

13 A: Well, I was separated for over a year.

14 Q: During the divorce proceeding with George
15 Argoe, Jr., were there any allegations of drug
16 abuse or infidelity or physical abuse?

17 A: On his side or mine?

18 Q: Either side.

19 A: He.

20 Q: Okay. He made allegations against you?

21 A: I don't know, but he drank. I don't know what
22 you're asking, but he drank.

23 Q: Gotcha. All right.

24 A: I do not drink. Did not, do not.

25 Q: And did those issues become part of the divorce

1 proceeding, his drinking?

2 A: Are you asking me why we didn't get along?

3 Q: No. I'm asking during your divorce, the legal
4 proceeding, did the lawyers and you all talk
5 about George's drinking?

6 MR. DODSON: Object to the form.

7 Q: Not your lawyer.

8 MR. DODSON: Object.

9 Q: Not anything you talked to your lawyer about,
10 but the subject of the divorce.

11 A: I don't know.

12 Q: Okay. Did you ever make any allegations during
13 the divorce or any other time that George Argoe
14 was physically abusive to you? Did he ever hit
15 you or push you?

16 A: What do you mean allegations?

17 Q: Well, let me ask it a better way, that wasn't
18 a very good question. Did George Argoe ever
19 hit you or push you during your divorce, I
20 mean, during your marriage?

21 A: Yes.

22 Q: Okay. Was the abuse that you suffered during
23 your marriage to George Argoe the only abuse
24 that you ever suffered in your life? Has
25 anyone else ever physically abused you?

1 A: No.

2 Q: From the time of birth?

3 A: Yeah.

4 Q: How about sexual abuse? Have you ever been a

5 victim of any sexual abuse from the time of

6 birth through today?

7 A: Never.

8 Q: Okay. Or mental abuse? Other than George

9 Argoe, was anyone ever mentally cruel to you,

10 talking harshly to you or abusing you just with

11 words, from birth through today?

12 A: That's hard for me to answer, because -- you're

13 not talking about any of the -- any of the

14 medical attendants?

15 Q: Oh, no, no.

16 A: Okay.

17 Q: We'll talk about that --

18 A: In other words, no.

19 Q: I mean, in your personal life. Okay. Growing

20 up as a child, any parent or grandparent --

21 A: Never.

22 Q: -- or high school boyfriend or friend? Okay.

23 And we will certainly get to --

24 A: Okay.

25 Q: I'm just kind of doing a little bit of

1 background work here. Now, tell me in your own
2 words and as detailed as you can, every --
3 well, I can ask that better. When did you
4 first suffer any type of abuse during your
5 marriage?

6 A: That's hard. That's a long-term marriage with
7 a child, and it creeps up on you slowly.

8 Q: Okay. Well, what is your first recollection of
9 any type of abuse during your marriage?

10 A: Well, it started verbally.

11 Q: Okay. When did that start?

12 A: Don't know.

13 Q: Was it before or after George, Jr. was born?

14 A: Oh, after.

15 Q: About how old was George, Jr. when it started?

16 A: Oh, he was about --

17 **MR. COLE:** Just me correct you, I think it's the
18 third.

19 Q: George, III. I'm sorry, you're right.

20 A: When he was at school away, you know, he was --
21 he's attended Clemson, and while he was away at
22 school.

23 Q: That's when the abuse began?

24 A: Yeah, I would say. That's when I started
25 noticing it, let's put it that way.

1 Q: Okay. And what were the details of it? How
2 did it manifest?

3 A: Well, his drinking and rages at night.

4 Q: And when was he first physically abusive to
5 you?

6 A: Probably after 2001. Probably in the year
7 2000, from then on.

8 Q: And what type of physical abuse did you endure
9 in your marriage to George Jr.?

10 A: He hit me, pushed me down on the floor,
11 threatened, and directed all his rages at me,
12 whatever the subject.

13 Q: Did you ever call the police --

14 A: Yes.

15 Q: -- related to these incidences?

16 A: Yes.

17 Q: At what address were you living when this
18 started to happen?

19 A: Putter Path.

20 Q: Okay.

21 A: 1415. No, excuse me, that's Hillside. 1155
22 Putter Path.

23 Q: And that's in Beaufort County?

24 A: No, that's in Orangeburg.

25 Q: Orangeburg, I'm sorry. All right, was George

1 Jr. ever arrested or cited for any acts against
2 you?
3 A: No.
4 Q: Did you ever go to court and ask for a warrant
5 for George Jr.'s arrest?
6 A: No.
7 Q: How many times did the police come to your home
8 related to instances between you and George
9 Jr.?
10 A: I don't know exactly. Guessing, maybe five.
11 Q: Were you ever cited for instances between you
12 and George Jr.?
13 A: No, never.
14 Q: Did George Jr. ever call the police on you that
15 you know of?
16 A: Not on me, no.
17 Q: Did he call the police on others?
18 A: No.
19 Q: Okay.
20 A: Oh, I'm remembering, when he would go into his
21 rages and it got to the point that I thought it
22 was becoming dangerous, I would leave the
23 house. And I did that one night and he called
24 the police saying that I was missing or
25 something. I don't know how it was ever

1 written up.

2 Q: Okay. Did the police find you and stop you, or
3 how did you become aware of him reporting you
4 missing?

5 A: No, I came back to the house. If I would give
6 him what I thought was a reasonable amount of
7 time, he would pass out, and then I'd go back
8 home, and that's what happened. And when I got
9 home, the police came looking for me. I was
10 there.

11 Q: And how did it resolve?

12 A: I don't know. He just left. He looked at me
13 and left.

14 Q: Did you ever show up in court for any instances
15 between you and George Jr.?

16 A: Never.

17 Q: Did you ever seek any counseling --

18 A: No.

19 Q: -- prior to 2005 for any reason?

20 A: No.

21 Q: You never had a family counselor or a marriage
22 counselor?

23 A: Never.

24 Q: Were you a member of a church prior to 2005?

25 A: Trinity Presbyterian Church in Orangeburg.

1 Q: Did you hold any leadership positions or
2 secretary positions or volunteer positions at
3 Trinity?

4 A: No. But I volunteered to help at the Bible
5 school the first week in June, or May, June,
6 whenever.

7 Q: Have you ever served in the military?

8 A: No.

9 Q: How about your father, did he serve in the
10 military?

11 A: No.

12 Q: Did your brother serve?

13 A: Yes.

14 Q: What branch did your brother serve?

15 A: The Reserves. I believe Air National Guard, I
16 believe.

17 Q: Have you ever volunteered in any community that
18 you lived in, other than the volunteerism that
19 you told me about with the church?

20 A: Not that I recall.

21 Q: Have you ever received any civic awards or
22 accolades -- well, let me stop there. Like
23 citizen of the year or anything like that
24 locally?

25 A: Oh, no, no.

1 Q: Have you ever been in the newspaper or on
2 television for any reason?

3 A: No.

4 Q: No newspaper clippings of any articles that
5 were ever done about you or family members that
6 you know of?

7 A: No. I mean, no.

8 Q: Okay. All right.

9 A: Other than my father passing, I was, you know.

10 Q: Sure, sure. In what year did your father pass?

11 A: It's been a long time. It was in the '60s.

12 Q: I'm sorry, I had seen that in the records. You
13 were young, married when he passed?

14 A: Married I believe less than a year.

15 Q: And let me ask you, let me back up a little bit
16 and ask you, when you came into your marriage
17 with George Jr., did you bring assets of your
18 own into that marriage?

19 A: Yes.

20 Q: Tell me what assets you brought into your
21 marriage with George Jr.

22 A: Property my father had given me.

23 Q: And that was in New Hampshire?

24 A: Yes.

25 Q: Anything else?

1 A: The car I was driving?

2 Q: Your Corvette?

3 A: Yeah.

4 Q: What year was your Corvette?

5 A: 1964.

6 Q: Did you get it brand new?

7 A: Yes.

8 Q: Do you still have that car?

9 A: Yes.

10 Q: Anything else? Did you have cash money, a

11 trust fund, or anything?

12 A: Oh, yes, I had, yes.

13 Q: Okay. Tell me about that.

14 A: It was a bank account.

15 Q: And how much money was in the bank account when

16 you were married?

17 A: Ten thousand dollars.

18 Q: Did you father, after you were married,

19 continue to give you money or was that kind of

20 your dowry that you took?

21 A: Well, we were married in August and he died in

22 April, you know.

23 Q: Okay. It was very short. Now, when you

24 married George, did he have assets of his own

25 already?

1 A: No.

2 Q: Did you receive inheritance when your father

3 died?

4 A: Yes.

5 Q: And what was the amount of the inheritance?

6 A: I don't know.

7 Q: During your marriage -- well, do you still have

8 the property from New Hampshire?

9 A: Just one piece left.

10 Q: During your marriage to George Argoe and up to

11 2005, did you receive money from -- did you

12 receive income from the property in New

13 Hampshire? Did it generate money for you?

14 A: No.

15 Q: Okay.

16 A: No, it did not.

17 Q: It wasn't rented, or it didn't have any --

18 A: No.

19 Q: -- tenants, or anything like that? So was it

20 you had to pay taxes on it?

21 A: (Nods head affirmatively.)

22 Q: Is that a yes?

23 A: Yes, it is.

24 Q: Did you manage the issues, the ownership issues

25 with the property in New Hampshire?

1 A: Yes.

2 Q: Up to and including 2005 when you were
3 committed; is that right?

4 A: Well, yes, I did. Yes, I did.

5 Q: Okay.

6 A: During 2000, well, at the -- my property tax
7 bills didn't come to the house, they
8 disappeared. So, yeah. But up until then,
9 yeah, I was handling everything. Things became
10 pretty hectic. Things were disappearing around
11 the house.

12 Q: When did that begin?

13 A: After I told him I wanted a divorce.

14 Q: Okay. When was the first time that you told
15 George Argoe you wanted a divorce?

16 A: I don't remember exactly.

17 Q: Around what year?

18 A: 2004, three, four, something like that. I
19 don't know.

20 Q: And is it your testimony that as early as 2000,
21 things started to disappear?

22 A: I don't know.

23 Q: Okay. It's not a memory contest.

24 A: I don't know.

25 Q: If you have some kind of guidepost that you

1 could put it between, like you did with George,
2 III, being away at Clemson, if you'll do that
3 for me. Do you know? Can you center it
4 between any events, any life events?

5 A: No, not exactly, but I was busy building in
6 Beaufort.

7 Q: Okay. Fair enough. And when you were busy
8 building in Beaufort, what is it that you are
9 recalling began to go missing?

10 A: I had my paperwork mostly. But not past
11 paperwork, it was present. It was mail.

12 Q: And what types of things were you looking for
13 that you didn't find around that period? You
14 talked about tax bills.

15 A: Tax bills, yeah. Tax bills, other bills.

16 Q: Do you know what happened to those bills?

17 A: I don't have proof --

18 Q: Okay. Do --

19 A: But --

20 Q: I'm sorry. Do you have a guess?

21 A: Yes.

22 Q: Okay. Tell me what your speculation or your
23 guess is that happened to those bills.

24 A: That my husband was taking them.

25 Q: Okay.

- 1 A: But that's a speculation. I have no proof.
- 2 Q: Did you ever call New Hampshire to get copies
- 3 of the tax bills or find out where they were?
- 4 A: I don't recall.
- 5 Q: All right. Now, at the time of your commitment
- 6 in June of 2005, did you have credit cards that
- 7 were in your name?
- 8 A: Yes.
- 9 Q: Solely your name?
- 10 A: Solely my name.
- 11 Q: What types of credit cards did you have in
- 12 2005?
- 13 A: Belk. I had -- I believe I had American
- 14 Express. And that -- that, you know, I don't
- 15 know where that went.
- 16 Q: Okay. Anything else?
- 17 A: Some kind of a gas card, BP I think, but his
- 18 name was on that.
- 19 Q: Okay.
- 20 A: Totally, not mine.
- 21 Q: Anything else?
- 22 A: Not that I recall.
- 23 Q: Have you ever worked outside the home?
- 24 A: Yes.
- 25 Q: When did you work outside the home?

- 1 A: I worked in my father's office.
- 2 Q: Okay. Where else?
- 3 A: For a short time, at the beach shop in Ocean
- 4 Drive.
- 5 Q: And when was that?
- 6 A: That was actually in the summers when I was
- 7 living at home before -- I really don't know.
- 8 Q: After you were married, did you ever work
- 9 outside the home?
- 10 A: Only at Cracker Barrel after I had left.
- 11 Q: Okay.
- 12 A: No, I started before. I'm sorry. Only at
- 13 Cracker Barrel.
- 14 Q: When did you work at Cracker Barrel?
- 15 A: Not sure of the dates. Not sure of the dates,
- 16 but it was before -- after commitment. After
- 17 I was forced drugged, I worked at Cracker
- 18 Barrel for, I believe, 14 months.
- 19 Q: And was it as a waitress?
- 20 A: No, retail.
- 21 Q: And are you currently employed?
- 22 A: No.
- 23 Q: What was your reason for leaving your
- 24 employment with Cracker Barrel?
- 25 A: I moved to Myrtle Beach.

- 1 Q: And how long did you live in Myrtle Beach?
- 2 A: Until 2010.
- 3 Q: And your current home, are you renting that
- 4 home or do you own it?
- 5 A: I own, I built and own 100 Factory Creek Court.
- 6 Q: And you own that currently?
- 7 A: I own that currently.
- 8 Q: All right. And when you were living in Myrtle
- 9 Beach, where did you live?
- 10 A: Rented a place.
- 11 Q: What was the address?
- 12 A: Barefoot.
- 13 Q: Do you know the mailing address for where you
- 14 rented --
- 15 A: P.O. Box 42, North Myrtle Beach.
- 16 Q: And was that a condo at Barefoot?
- 17 A: Yes.
- 18 Q: What was the actual address of it?
- 19 A: I don't know.
- 20 Q: Did you rent through a friend or an agency?
- 21 A: Agency.
- 22 Q: What was the name of the agency?
- 23 A: Strand Management, I believe.
- 24 Q: Did anybody live with you in that condo?
- 25 A: No.

- 1 Q: You lived alone there?
- 2 A: My cat.
- 3 Q: Okay. And what was your reason for moving to
- 4 Myrtle Beach?
- 5 A: That's where I was from.
- 6 Q: Was there any family there that you were moving
- 7 back home to?
- 8 A: No.
- 9 Q: Were you a member of any clubs or civic
- 10 organizations down there? Golf clubs?
- 11 A: No.
- 12 Q: What did you do on a daily basis while you were
- 13 living in Myrtle Beach?
- 14 A: Just enjoyed the beach.
- 15 Q: Just -- I'm sorry.
- 16 A: Go ahead.
- 17 Q: Did you spend time on the actual coast?
- 18 A: Yes.
- 19 Q: Anything else that you enjoyed while you were
- 20 down there?
- 21 A: The freedom. Just the freedom to be able to
- 22 breathe.
- 23 Q: Did you have friends or acquaintances who
- 24 visited you when you lived in Myrtle Beach?
- 25 A: Well, I had Joan Graves, my friend from Texas.

- 1 Q: And how long has Joan been your friend?
- 2 A: Since Orangeburg.
- 3 Q: And how often did she visit you in Myrtle
- 4 Beach?
- 5 A: She lived in a house I owned in North Myrtle
- 6 Beach.
- 7 Q: Okay. Anybody else that visited or spent time
- 8 with you while you were living there?
- 9 A: No. No, that was it.
- 10 Q: Did you have friends or close acquaintances
- 11 that you spent a lot of time with during 2005
- 12 prior to your commitment?
- 13 A: No.
- 14 Q: Okay.
- 15 A: None that I can recall.
- 16 Q: No girlfriends that you would talk to on the
- 17 telephone?
- 18 A: Joan Graves.
- 19 Q: Okay. Anybody else?
- 20 A: People at where I used to eat, Catch and
- 21 Cleaver, the restaurant where I used to eat
- 22 lunch.
- 23 Q: Catch and Cleaver?
- 24 A: Catch and Cleaver. It's not there anymore.
- 25 Q: All right. From say six months before your

1 commitment, from January 2005 through June, do
 2 you know if you saw Joan, personally saw or
 3 spent time, dinner or drinks or anything with
 4 her?

5 A: She had already moved to Texas, but I talked
 6 with her regularly.

7 Q: Okay. Did you talk on your cell phones --

8 A: Yeah.

9 Q: -- or home phones?

10 A: Yes.

11 Q: And Joan lives in Myrtle Beach now, or where
 12 does she live now?

13 A: Joan is deceased.

14 Q: Oh, okay. I'm sorry. When did she pass?

15 A: September, I -- 2010.

16 Q: Do you currently have any friends or close
 17 acquaintances that you spend time with
 18 socially?

19 A: In Beaufort.

20 Q: Who are they?

21 A: My former sister-in-law, Patricia Lewin.

22 Q: And where does Patricia live?

23 A: Saint Helena Island.

24 Q: And does she have any children?

25 A: Yes.

1 Q: She has children by Read --

2 A: Yes.

3 Q: -- or by someone else?

4 A: Both.

5 Q: Okay. And do you have a relationship with the

6 children who are Read's, the sons?

7 A: Yes.

8 Q: When was the last time that you spoke with

9 them?

10 A: This week.

11 Q: And so those are two nephews?

12 A: Two nephews.

13 Q: Do you have a relationship with Buss currently?

14 A: No.

15 Q: You and Buss have not made amends?

16 A: No.

17 Q: And do you speak to each other?

18 A: No.

19 Q: Did you and George Argoe, Jr. ever make amends

20 before he passed?

21 A: No.

22 Q: When he passed, you were completely estranged,

23 did not speak to each other?

24 A: That's correct.

25 Q: Did you attend his funeral?

1 A: No.

2 Q: Or send any condolences when he passed?

3 A: No.

4 Q: Did you speak with Buss at all when his father

5 passed?

6 A: No.

7 Q: Did he try to make contact with you at all?

8 Buss?

9 A: No.

10 Q: When is the last time that you did speak with

11 Buss?

12 A: I don't remember.

13 Q: Okay. Have you spoken with him since your

14 commitment in 2005?

15 A: No.

16 Q: When George Jr. died, you two were completely

17 divorced; is that correct?

18 A: Yes.

19 Q: The divorce was final. Did you have any life

20 insurance policies that you collected on when

21 he passed?

22 A: Yes. Very small.

23 Q: Okay.

24 A: I found them in a secretary piece of furniture

25 that I got that was my grandfather's. My

1 grandfather's secretary.

2 Q: And how much were the policies?

3 A: No more than 16,000, I think, total. That was

4 it.

5 Q: Did you receive any other inheritance when

6 George died?

7 A: No.

8 Q: Did he have any retirement that went to you or

9 any bank accounts that went to you on his

10 death?

11 A: No.

12 Q: Did he remarry?

13 A: No.

14 Q: Or did he have any relationships after, that

15 you know of, after you two divorced?

16 A: I don't know.

17 Q: Is Buss married?

18 A: Yes.

19 Q: What's his wife's name?

20 A: Jenny Alcott.

21 Q: And when did he marry Jenny?

22 A: Right after Clemson, but I don't know the year.

23 Q: Do they have children?

24 A: I have heard by way of the grapevine they have

25 one. But --

1 Q: You've never seen the child?

2 A: No.

3 Q: You have no relationship with him?

4 A: No.

5 Q: Do you know how old he or she is?

6 A: No.

7 Q: What's Buss' occupation?

8 A: He used to work for Federated Insurance, and

9 again, as far as I know, he's running his dad's

10 business.

11 Q: And that's in Beaufort?

12 A: Paul Argoe Screens in North, South Carolina.

13 Q: So they still live in Orangeburg County?

14 A: As far as I know.

15 Q: And Jenny, does she work outside the home or

16 has she ever?

17 A: I don't know. She has, yes.

18 Q: What was her occupation?

19 A: HR person with a telephone company, I think

20 BellSouth, in Human Resources.

21 Q: And you have no relationship with Jenny either?

22 A: No.

23 Q: When was the last time that you spoke with

24 Jenny?

25 A: Oh, I don't remember.

1 Q: Did you have a good relationship with her prior
2 to your commitment in 2005, I mean as good --
3 A: Yes.
4 Q: -- mother-in-law, daughter-in-law?
5 A: Yes.
6 Q: No strained relationship there?
7 A: None that I know of.
8 Q: All right. Did you have balances on your
9 credit cards when you were committed in 2005?
10 A: Probably.
11 Q: How large were the balances?
12 A: I don't know.
13 Q: Do you still have any of those accounts that
14 you had in 2005?
15 A: I don't think so.
16 Q: Do you have documents that would have those
17 account numbers or the creditors that you had
18 in 2005?
19 A: I have no documents. None.
20 Q: When did you first -- well, in 2005, were you
21 filing a joint tax return --
22 A: Yes.
23 Q: -- with George Jr.?
24 A: Yes.
25 Q: And do you currently file your tax returns?

1 A: Yes.

2 Q: What's your source of income now?

3 A: Social security, and I have a mortgage on Paul

4 Argoe Screens.

5 Q: And do you collect monthly on the mortgage on

6 Paul Argoe Screens?

7 A: Yes.

8 Q: When did you grant the mortgage on Paul Argoe

9 Screens?

10 A: Divorce settlement.

11 Q: Okay. That was part of the divorce?

12 A: (Nods head affirmatively.)

13 Q: And is that paid through a third party, or does

14 Buss send that directly to you?

15 A: It's deposited into a bank account.

16 Q: And what bank is that?

17 A: NBSC.

18 Q: Do you have any other accounts other than those

19 at NBSC?

20 A: No, one.

21 Q: Did you have any other accounts, other than the

22 one's at NBSC -- well, let me ask a better

23 question. Did you have the NBSC account when

24 you were committed in 2005?

25 A: No.

1 Q: What accounts did you have in 2005 when you
2 were committed?

3 A: Oh, let's see. We had a joint checking
4 account, First Citizens.

5 Q: Anything else?

6 A: An account in Saint Matthews. I can't
7 remember. South Carolina National, I think it
8 was.

9 Q: And those accounts were in George's name or
10 your name or both?

11 A: That was in my name.

12 Q: And what type of funds went into that South
13 Carolina National in Saint Matthews?

14 A: Well, I sold logs from my property in New
15 Hampshire.

16 Q: Did you cut the timber on that property?

17 A: That's how I paid the taxes.

18 Q: And how much was received from the timber?

19 A: I don't know. I don't know.

20 Q: Now, when you were committed in 2005, were your
21 properties in New Hampshire in default from a
22 tax standpoint?

23 A: I hear they were.

24 Q: Had you looked into it prior to your commitment
25 in 2005?

1 A: I remember looking for the paperwork and it was
2 gone. And also, the first time I called the
3 police was because Lewis was loading up all my
4 records and paperwork in his van and taking
5 them, he said, to the dump.

6 Q: Had your credit cards from, say, January to
7 June of 2005, had the balances on your credit
8 cards increased?

9 A: I don't know.

10 Q: Had you increased your spending prior to your
11 commitment?

12 A: I bought clothes because I had had no new
13 clothes in two years.

14 Q: Okay.

15 A: And it was time.

16 Q: And how much did you spend on clothes?

17 A: I don't know.

18 Q: Was it more than \$1,000?

19 A: Probably.

20 Q: Was it more than \$5,000?

21 A: About that range.

22 Q: Did you cash out any savings bonds or savings
23 accounts that you had prior to your commitment
24 in 2005?

25 A: No. No.

1 Q: Did you have any independent source of income

2 --

3 A: No.

4 Q: -- before you were committed?

5 A: No.

6 Q: And so all the money that you received for
7 daily living and other purposes would have been
8 received from your husband?

9 A: Say that again.

10 Q: Sure. Let's say from January 2005 until June
11 2005, just that six month period, did you have
12 any source of income other than money that you
13 would have received from your husband? I'm not
14 saying it wasn't yours because you were
15 married, but is that where you got your money?

16 A: The only money he ever gave me was \$300 a week,
17 and that was groceries and live on. The rest
18 I paid for myself. Anything else that I
19 needed, I paid for it.

20 Q: And where did you get the money to pay for the
21 other stuff?

22 A: From my savings account and from Lewin Forest.

23 Q: Okay.

24 A: Oh, I had an account with Lynn Norris in IDS.
25 I had just forgotten about that. IDS, and I

1 got money from there when I needed it.

2 Q: Okay. Now, you said Lewin Forest, is that some

3 sort of corporation or LLC that you had?

4 A: That's where the property in New Hampshire came

5 from.

6 Q: What's the name of that company?

7 A: Well, it doesn't exist anymore.

8 Q: Okay. What was the name of it?

9 A: Lewin Forest.

10 Q: Was it an LLC or a corporation?

11 A: It was Lewin Forest, Inc.

12 Q: And who was the president of Lewin Forest,

13 Inc.?

14 A: I don't know.

15 Q: Who was the secretary of Lewin Forest, Inc.?

16 A: I don't know.

17 Q: Did you have any management role in Lewin

18 Forest, Inc.?

19 A: I paid the tax bills for the company, but

20 that's been a long time. That's back before --

21 That company was disbanded in '94.

22 Q: Okay.

23 A: And then we each had our own individual

24 properties so that we could do what we wanted.

25 Q: Okay. And how did you -- where did the -- how

1 much money did you have in savings in 2005?

2 A: I don't know.

3 Q: Was it more than \$10,000?

4 A: At times it was.

5 Q: Was it more than \$25,000?

6 A: No.

7 Q: And how did that money in savings get
8 replenished? If you spent some, how did more
9 money get put back for you to continue buying
10 stuff that was over the \$300?

11 A: From my IDS account. I had some income there.
12 And I'm sorry I didn't mention it sooner, I
13 just forgot.

14 Q: Oh, no, no, no. I'm not trying to pin you down
15 to anything at all.

16 A: I just forgot.

17 Q: Now, the IDS account, how did it generate
18 income?

19 A: From investments that it made.

20 Q: Where did the investments originate?

21 A: I did have some stock that I did sell to buy a
22 second dock at the marina.

23 Q: All right. Did that stock originate with your
24 father or somewhere else, or did it originate
25 from the marriage?

1 A: The father.

2 Q: These were things that you brought with you
3 prior to meeting George Jr.; is that right?

4 A: This came from his death. My father's death.
5 Nothing ever came from my ex-husband's death.

6 Q: Okay, gotcha. So your father's death, was this
7 a trust that he had set up --

8 A: No.

9 Q: --that went to you upon dying?

10 A: It was cash and property, and I took it to IDS
11 and asked for, you know, investments and help
12 in managing it.

13 Q: Do you still have those accounts?

14 A: No.

15 Q: When were they liquidated, or when did they
16 reach a zero balance?

17 A: When I got to an attorney, we disbanded it
18 after the commitment.

19 Q: Okay. Now, you don't tell me anything that you
20 talked to any attorney about, okay? But did
21 you spend money out of that IDS account from
22 January to June of 2005?

23 A: 2005, January to June. I don't recall.

24 Q: Did you increase your personal spending, in
25 your opinion? Just, and we can look at the

1 records and study them, but in your opinion, do
 2 you remember, increasing your spending from
 3 January to June of 2005?
 4 A: No, only for the clothes that I needed that I
 5 hadn't purchased in two or three years.
 6 Q: Did you buy any new jewelry from January to
 7 June 2005?
 8 A: No.
 9 Q: Did you buy any new cars --
 10 A: No.
 11 Q: -- or anything other than the clothes?
 12 A: Just clothes.
 13 Q: Have you ever had any suicidal thoughts?
 14 A: Never.
 15 Q: Never considered taking your own life?
 16 A: Never.
 17 Q: Have you ever had any homicidal thoughts?
 18 A: Never.
 19 Q: Never considered killing another person?
 20 A: Never.
 21 Q: Have you ever suffered from depression?
 22 A: Never.
 23 Q: Or anxiety?
 24 A: No.
 25 Q: Other than -- well, let me ask it a better way.

1 Prior to 2005, were you ever prescribed any
2 psychiatric medication?

3 A: No.

4 Q: Never took anxiety medication --

5 A: Never.

6 Q: -- or any type of medication that would operate
7 in your brain that you understood?

8 A: Never.

9 Q: Did you have any postpartum depression or
10 postpartum issues after you had Buss?

11 A: No. There wasn't time.

12 Q: Okay. Everything was fine after delivery; came
13 into motherhood smoothly?

14 A: Yes.

15 Q: Did you ever have any extramarital affairs
16 during your marriage?

17 A: No.

18 Q: Did Mr. Argoe have any extra marital affairs?
19 I know that there was one in 1986 with his
20 secretary that he admitted to.

21 A: (Nods head affirmatively.)

22 Q: Is that a yes?

23 A: Yes.

24 Q: Were there any others?

25 A: Well, let me put it this way, he said that

1 because he worked and made the money that he
2 could do as he pleased as far as the affairs
3 went.
4 Q: Okay. Did -- I'm sorry.
5 A: Go ahead.
6 Q: Were you done?
7 A: I was done.
8 Q: Did you ever suspect any other affairs other
9 than the one in 1986?
10 A: Oh, yes.
11 Q: How many?
12 A: I can hardly count.
13 Q: Okay. Do you know whether Mr. Argoe had any
14 children out of wedlock?
15 A: No.
16 Q: Or did you ever suspect that he had children
17 out of wedlock?
18 A: No.
19 Q: Now --
20 A: Suspect.
21 Q: Uh-huh (affirmative response).
22 A: I asked him about it once.
23 Q: Okay. And what was his answer?
24 A: Blew to the roof. Absolutely violent. Started
25 one of his rages that lasted a while. So

1 naturally, I'm not going to bring that up
2 again.

3 Q: Do you believe that your issues in your
4 marriage, the abuse that we talked about and
5 the affairs, caused you any mental problems?

6 A: Any of his abuse?

7 Q: Right.

8 A: No, because by this time I was getting used to
9 it.

10 Q: Okay. Have you ever been told by any physician
11 that you have psychiatric disorders?

12 A: No.

13 Q: Okay. Has any --

14 A: Now we're not talking about Three Rivers?

15 Q: That's right. And we're going to talk about
16 that.

17 A: Okay. Okay.

18 Q: Have you ever made any substantial charitable
19 donations?

20 A: No.

21 Q: More than \$100? I know that's not substantial,
22 so I kind of changed that question.

23 A: Maybe. Probably.

24 Q: Okay. To what type of organizations?

25 A: Ministries.

1 Q: Okay. When did you start to make those
2 donations to ministries?
3 A: Well, I've always done that, but mostly by
4 tapes. That's mostly what I did.
5 Q: Okay. And those were the gospel and
6 evangelical type --
7 A: Yes.
8 Q: -- tapes that you liked to listen to in the
9 car?
10 A: Christian.
11 Q: What is the most money that you have ever
12 donated at one time to any entity?
13 A: Oh, I don't recall that.
14 Q: Would it be more than \$100?
15 A: I don't know.
16 Q: Have you ever donated more than \$1,000 at one
17 time?
18 A: I wouldn't think so.
19 Q: Okay. What was the Cornerstone Community
20 Church?
21 A: Interdenominational, and it was new.
22 Q: And where was that?
23 A: In Orangeburg.
24 Q: And did you attend that church?
25 A: Yes.

1 Q: How often did you attend that church?

2 A: Whenever I could.

3 Q: Have you ever been a member at any church other
4 than the Trinity Presbyterian that we talked
5 about?

6 A: First Baptist in Orangeburg before Trinity
7 Presbyterian.

8 Q: Do you know whether you ever had any diagnoses
9 of mental diseases in your family: your mother,
10 your father, brother, sister?

11 A: Mother, father, brother, sister? No.

12 Q: Growing up did you ever hear of any grandmother
13 or grandfather having a mental disorder?

14 A: No.

15 Q: Have you ever been told or heard of anybody in
16 your family being committed for psychiatric
17 issues, whether it was voluntarily or
18 involuntarily?

19 A: Oh, no. No.

20 Q: Have you ever been treated for the abuse of
21 drugs or alcohol?

22 A: No. I don't drink and I don't smoke.

23 Q: Do you know if anybody in your immediate family
24 has been treated for the abuse of drugs or
25 alcohol?

- 1 A: In my immediate family, meaning?
- 2 Q: Well, in your family at all. In your side of
- 3 the family, not George's, but yours.
- 4 A: Been treated?
- 5 Q: Uh-huh (affirmative response). For the abuse
- 6 of drugs or alcohol?
- 7 A: Not that I know of.
- 8 Q: And you're not aware of anybody being
- 9 hospitalized for psychiatric disorders on your
- 10 side of the family?
- 11 A: Oh, no.
- 12 Q: Now, the issues that are being litigated in
- 13 this lawsuit related to your commitment in
- 14 2005, are those physical issues ended for you,
- 15 meaning that you're not -- well, are you still
- 16 seeking any medical treatment for anything that
- 17 happened in 2005 or 2006?
- 18 A: Any medical treatment?
- 19 Q: Any medical treatment? Are you seeing any
- 20 doctors?
- 21 A: No.
- 22 Q: Not alleging that you've got any side effects
- 23 from drugs or anything like that that you took?
- 24 A: Well, I had side effects from drugs.
- 25 Q: Well, currently, right as we speak today. If

1 you had them, are they gone?

2 A: No, I'm slower.

3 Q: Okay.

4 A: I have diarrhea.

5 Q: Okay.

6 A: I have an irregular heartbeat. My thyroid took

7 a hit. Now, I didn't have any of this before

8 Three Rivers, plus the stigma attached with

9 Three Rivers. Everywhere I go, oh, there she

10 is. She's been in a mental hospital.

11 Q: Now, when you say those things, are those

12 things that anybody has ever said out loud to

13 you?

14 A: Like what?

15 Q: Like "there she is" or "she's been in a mental

16 hospital," or is that just things that you

17 feel?

18 A: It's a look and moving away from me. Coldness.

19 And I didn't deserve it. There was nothing

20 wrong with me then, there's nothing wrong with

21 me now, and there never has been.

22 Q: What doctors are you currently seeing,

23 physicians that you see for any reason

24 currently?

25 A: Dr. Cornell in Myrtle Beach for my

1 uncontrollable diarrhea. I get a powder three
2 times a day, breakfast, lunch, and dinner, to
3 control that. He prescribes it. And I have
4 already given a dermatologist, Dr. Williams in
5 Myrtle Beach. I've given you that.

6 Q: Okay.

7 A: And then these emergency clinics for sinus
8 infections and ear infections that I seem to
9 get.

10 Q: Okay.

11 A: That's it.

12 Q: Who prescribes your hormone therapy?

13 A: Oh, I forgot him. My OB/GYN in Loris, South
14 Carolina. Juberg.

15 Q: And you travel back to see Dr. Juberg?

16 A: Yes.

17 Q: Do you have any complaints about any care that
18 any of your current physicians are providing?
19 Dr. Cornell, Dr. Williams, Dr. Juberg?

20 A: Any complaints? None for Juberg. No,
21 basically.

22 Q: And may we assume that because they are your
23 treating physicians, you respect them as your
24 physicians?

25 A: Oh, yeah.

1 Q: Or you would be seeing a different doctor?

2 A: Yeah.

3 Q: No reason to disagree with anything they've
4 told you in their medical treatment of you?

5 A: No.

6 Q: Okay. Now, have any of the doctors that you
7 are currently seeing ever told you that you
8 have any symptoms now related to your
9 commitment and the issues in this lawsuit, 2005
10 and 2006?

11 A: Well, Dr. Cornell has not said anything about
12 that exactly. But I didn't have this before,
13 and he really has not come up with a diagnosis.
14 He did the colonoscopy, all the tests, he can't
15 find anything. There's nothing else, but he
16 doesn't say it.

17 Q: Have you asked him if he thinks that your
18 current problems with diarrhea are related to
19 your commitment and your psychiatric
20 medication?

21 A: He says he doesn't know, and he doesn't even
22 know that this medicine is going to stop it,
23 but it controls it. That's it. That's it.

24 Q: Has Dr. Cornell ever told you that he does not
25 think the diarrhea is related to the commitment

1 or the medication?

2 A: No, he's never said that. He's never said

3 that.

4 Q: All right. Now, Dr. Juberg, in Loris, has he

5 ever prescribed you any type of anxiety meds?

6 A: Never.

7 Q: And you see him for a yearly checkup?

8 A: Once a year.

9 Q: Has he ever performed any surgeries for you?

10 A: No.

11 Q: And he prescribes the hormone therapy with that

12 yearly visit?

13 A: Yeah.

14 Q: Have you ever talked to Dr. Juberg about your

15 commitment in 2005 or your psychiatric

16 medications?

17 A: Yes. Every time you go to see a doctor you

18 have to explain what drugs you have been on,

19 and I tell them all, Haldol and Risperdal, that

20 I didn't need.

21 Q: Okay. And has Dr. Juberg expressed any of his

22 thoughts or opinions about the commitment to

23 you?

24 A: Just surprise.

25 Q: Has he ever, has Dr. Juberg or any other

1 physician ever criticized any hospital or
2 doctor that you're suing in this case?

3 A: Oh, no.

4 Q: Okay. Has any physician or any party that
5 you've ever spoken to, criticized, not your
6 lawyer, don't tell me anything that you've
7 talked to any lawyer about, criticized the
8 hospital or the doctors that you're suing in
9 this case?

10 A: No.

11 Q: Okay.

12 A: They don't do that.

13 Q: Now, Dr. Williams in Myrtle Beach is your
14 dermatologist; is that right?

15 A: Yes.

16 Q: Has Dr. Williams expressed to you any diagnoses
17 or any opinions that you feel are related to
18 this lawsuit?

19 A: No. His form says medical records, and you go
20 in there with them, and he says, don't show
21 them to me; I don't care. So he basically does
22 not -- you know, he doesn't get into that. He
23 just treats skin.

24 Q: Okay.

25 A: And I tried to comply with what his records

1 say, and he doesn't want to see them, doesn't
2 want to hear them, doesn't want to talk about
3 them.

4 Q: What have you tried to show Dr. Williams
5 related to this case?

6 A: I tried to tell him that I was on Haldol and
7 Risperdal because it says, former medicines you
8 were on.

9 Q: Okay.

10 A: And I forgot the Geodon. They gave me that,
11 and I had a reaction, and they took me off of
12 that. And that's when I got something else,
13 Haldol and Risperdal.

14 Q: Now, have you tried to tell Dr. Williams about
15 the Haldol, Geodon, and Risperdal because you
16 felt it related to your care?

17 A: No, because it was on his form.

18 Q: You just wanted to comply with what his form
19 said?

20 A: Yes, I mean, if somebody's going to treat me
21 they've got to know what they're treating,
22 don't they?

23 Q: Have you ever written a letter to any editor of
24 any newspaper?

25 A: No.

1 Q: Have you ever written anything down about this
2 case and your commitment in 2005?

3 A: No.

4 Q: Did you keep a diary or any notes or write any
5 letters to family?

6 A: I did not.

7 Q: Did anybody ever come visit you while you were
8 committed in 2005?

9 A: Well, ex-husband, son, daughter-in-law, and a
10 former neighbor across the street from me in
11 Orangeburg.

12 Q: Who was that?

13 A: Jane Edenfield.

14 Q: Do you still have a relationship with Jane?

15 A: No.

16 Q: Is Jane still living?

17 A: I don't know.

18 Q: When did you end your relationship with Jane
19 Edenfield?

20 A: Right then.

21 Q: And tell me about that.

22 A: Well, she wasn't listening to me. Nobody was
23 listening to me, and she wasn't listening to me
24 either.

25 Q: Did Jane express concerns to you about your

1 health when she came to visit your when you
2 were committed?

3 A: No.

4 Q: Well, how did you end your relationship with
5 Jane during the visit when you were committed?

6 A: She just came in and said that her husband had
7 been there, manic depressive, and brought me
8 some magazines and ho, ho, ho and left. That
9 was about it. And I tried to tell her that I
10 didn't need to be there, and that my husband
11 had done this to me, and she didn't even
12 listen. So that ended that right then.

13 Q: Did Jane ever try to make contact with you
14 after that visit?

15 A: No.

16 Q: Have you ever tried to make contact with Jane
17 since that visit?

18 A: No.

19 Q: Did you have any friends who kind of stood with
20 you through the divorce? Any girlfriends or
21 any male friends?

22 A: The divorce? Well, just Joan Graves.

23 Q: Okay.

24 A: And we talked on the telephone regularly. She
25 basically went through it with me.

1 Q: Was there anybody else?

2 A: No.

3 Q: Have you ever been involved in any other
4 lawsuits other than the one that we all know
5 about that was kind of related to this case,
6 not related to this case, but related to some
7 of the issues with Buss and George Jr.? Have
8 you ever filed any other lawsuits?

9 A: No.

10 Q: Have you ever been sued by anybody?

11 A: No.

12 Q: Have you ever -- I'm sorry, strike that. I
13 think I saw a listing in some recent discovery
14 responses related to Sistercare?

15 A: Yeah.

16 Q: Tell me about that. Are you currently seeking
17 treatment at Sistercare, or?

18 A: No. And there was no treatment given at
19 Sistercare.

20 Q: Okay. When did you go to Sistercare?

21 A: The year that I was forced drugged by the
22 court, and I was complying, I realized my life
23 was in real danger, not only from my husband at
24 the time, but also from these drugs that I was
25 being forced to take. I was very sick,

1 emaciated, shaking, and I needed -- I needed
2 help fast. So I went to Sistercare in West
3 Columbia, saw a Dr. Ross, and we discussed the
4 possibility of her taking me, basically, off
5 the street and replacing me somewhere else. We
6 discussed it.

7 Q: In like a shelter home for battered women?

8 A: Well, it was just another place to live, and I
9 would get a job and be another person.

10 Q: And what happened to that idea?

11 A: I considered it, and I would have had to leave
12 my cat. And I know that sounds foolish to
13 somebody that doesn't understand animals, but I
14 did not want to leave him. And I figured that
15 I would tough it out. Also, you have to
16 realize that during this time, I was fighting
17 tremendously to live. That was the absolute
18 goal of my day, to live.

19 Q: And this was during 2005, 2006?

20 A: When I was being drugged for that year.

21 Q: And that was a court order required that you
22 take --

23 A: Absolutely.

24 Q: -- medication; is that right?

25 A: Absolutely.

1 Q: Now, you complied with that court order?

2 A: I complied.

3 Q: Even though it required that you do something
4 you didn't want to do?

5 A: Detrimental to me. It was court ordered, and
6 I did it.

7 Q: And is that because you understood the
8 significance of a court order?

9 A: That is.

10 Q: We can all agree that court orders are to be
11 complied with; is that right?

12 A: I agree.

13 Q: And whatever the court order says you have to
14 do --

15 MR. DODSON: Object.

16 Q: -- you do?

17 MR. DODSON: Object. You can go ahead and answer.

18 Q: Is that right?

19 MR. DODSON: Object to the form.

20 A: Well, I do agree that court orders --

21 MR. DODSON: That's fine. I'm just putting an
22 objection on the record.

23 A: Oh, okay.

24 MR. DODSON: That doesn't mean that you don't
25 answer, okay?

1 Q: And whatever the court order says do, you do
2 it?

3 **MR. DODSON:** Object to the form.

4 A: Anybody must do it; it's not just me.

5 Q: There's no choice in the matter?

6 **MR. DODSON:** Object to the form.

7 A: Right.

8 Q: Because the court has required that it be done?

9 **MR. DODSON:** Object to the form.

10 Q: Is that right?

11 A: Yes.

12 Q: And you understand the repercussions for not
13 complying with a court order; is that right?

14 **MR. DODSON:** Object to the form.

15 A: What happens when I don't, I don't know.

16 Q: Or any party. Have you ever heard of contempt
17 of court?

18 A: Oh, yes, yes.

19 Q: And that is when a person can be fined or
20 jailed for not doing what the judge said; is
21 that right?

22 **MR. DODSON:** Object to the form.

23 A: As far as I know it is.

24 Q: Okay. And so based on a court order, it is
25 your testimony that you did something that you

1 knew was detrimental to your health --

2 A: Yes.

3 Q: -- because of the significance of that order?

4 A: Yes.

5 Q: I also saw a subpoena recently for autopsy
6 records of George Argoe, Jr.

7 A: Yes. Yes.

8 Q: What is it that you believe George Jr.'s
9 autopsy records would have to do with our case?

10 **MR. DODSON:** Object to the form. Actually --

11 Q: I'm not asking for anything that you've talked
12 to your lawyer about.

13 **MR. DODSON:** Don't answer that question to the
14 extent that you've learned that information
15 from anything, any communications with my
16 office or me.

17 Q: Okay.

18 A: I can't answer it.

19 Q: Do you have any belief that George Argoe, Jr.'s
20 autopsy records have anything to do with your
21 commitment in 2005?

22 A: I don't know.

23 Q: Prior to your commitment in 2005, did you have
24 conversations with your brother, Read, about
25 seeking mental health assistance?

1 A: No.

2 Q: You?

3 A: No.

4 Q: You never talked to Read about it?

5 A: I talked to Read normally.

6 Q: Okay. Sure. Did Read and Donna come and visit

7 you to try and get you to voluntarily seek

8 mental health assistance --

9 A: Never.

10 Q: -- before you were committed?

11 A: Never. Never heard the word, the suggestion,

12 or anything.

13 Q: Okay. Before you were committed in June of

14 2005, did you ever have any conversations with

15 anybody about seeking mental health assistance?

16 A: No.

17 Q: Not even George Jr.?

18 A: No.

19 Q: Okay. Did he ever say anything to you like, I

20 think you're sick and need to be hospitalized?

21 A: Well, there was so much yelling going on on his

22 side, I don't yell back, it's not in my nature

23 to do that, and you can't argue with a drunk.

24 It just can't be done. So what he said, I

25 don't know.

1 Q: How about Buss?

2 A: No, never.

3 Q: Did Buss ever say, Mom, I think you need to go

4 to the hospital?

5 A: Never, never.

6 Q: Did you have a close relationship with Buss

7 before you were --

8 A: I thought so, yes.

9 Q: Okay. Let me finish my question. I'm sorry.

10 See, we get talking and it is hard.

11 A: I forget they're there.

12 Q: That's all right. Did you have a close

13 relationship with your son, Buss, before you

14 were --

15 A: As far as I know.

16 Q: Okay. Before you were committed in 2005?

17 A: I thought so.

18 Q: Now, since you were committed in 2005, have you

19 had any exchange of Mother's Day cards or

20 birthday cards or anything with Buss or his

21 children?

22 A: Anything he sends me goes straight back

23 unopened.

24 Q: Has Buss sent you things since -- let me

25 finish, I'm sorry. That's okay. Since you

1 were committed in 2005, has Buss sent you mail
2 and things to your home or anywhere else?

3 A: One that I remember. Sent it back.

4 Q: What was it?

5 A: I don't know. It was a thick envelope card.
6 I don't know. I sent it back.

7 Q: Did it coincide with a holiday, Christmas or
8 Valentine's Day or Mother's Day or your
9 birthday?

10 A: I don't remember.

11 Q: Has Buss or his family sent you flowers or any
12 gifts since you were committed in 2005?

13 A: 2005? When I was living, working at Cracker
14 Barrel, living at Wellington Lakes, I got
15 flowers from him and his wife, I believe. And
16 I gave them away. I gave them to the office.
17 I took them down and put them in the office at
18 the --

19 Q: And that was when you were working at Cracker
20 Barrel?

21 A: Yes.

22 Q: Did those flowers coincide with a holiday or
23 Mother's Day?

24 A: I don't remember.

25 Q: Your birthday?

1 A: Probably something.

2 Q: And you gave them away?

3 A: I gave them away.

4 Q: Didn't contact Buss or the family?

5 A: No.

6 Q: Did Buss or his family, or/and his family ever

7 come to Cracker Barrel to see you when you were

8 working there?

9 A: Not that I recall. And there was a letter from

10 my attorney, Jan Warner, to my ex-husband's

11 attorney telling him not to contact me while I

12 was working.

13 Q: Okay.

14 A: That he could go eat, but he was to leave me

15 alone, and I gave that letter to the manager of

16 Cracker Barrel.

17 Q: I'm sorry --

18 A: Karen was her name at the time.

19 Q: And what was Karen's last name?

20 A: Mann, I think.

21 Q: M-A-N-N?

22 A: Yeah, I guess.

23 Q: And she was the manager?

24 A: She was the manager.

25 Q: Which Cracker Barrel was it that you worked at?

- 1 A: In Orangeburg.
- 2 Q: And was your resignation from the Cracker
- 3 Barrel voluntarily?
- 4 A: Yes.
- 5 Q: You were not asked to leave?
- 6 A: No..
- 7 Q: And you gave proper notice?
- 8 A: Yeah.
- 9 Q: Two weeks?
- 10 A: Yeah.
- 11 Q: Did you ever miss any extended periods of work
- 12 there?
- 13 A: Never.
- 14 Q: And is that the only job that you held outside
- 15 of your home since you worked at the beach shop
- 16 before you were married and your father's
- 17 office?
- 18 A: That's it.
- 19 Q: The letter from Jan to Walsh, was it Walsh or
- 20 was it a different lawyer, the letter between
- 21 the lawyers related to your husband?
- 22 A: No, that was my ex-husband's divorce lawyer --
- 23 Q: Okay. It's okay. What caused that letter to
- 24 be written? Was George going to Cracker
- 25 Barrel?

- 1 A: Yes.
- 2 Q: What was he doing while you were working there?
- 3 A: He would come in and try to find out when I was
- 4 working. Try to get my schedule.
- 5 Q: Okay. I'm sorry.
- 6 A: Go ahead.
- 7 Q: Did George ever try to reconcile your marriage
- 8 after your commitment in 2005?
- 9 A: No, he just said, you'll never get a divorce
- 10 now.
- 11 Q: But he never made any type of affectionate --
- 12 A: No.
- 13 Q: -- pass at reconciling the marriage?
- 14 A: No.
- 15 Q: Is that right?
- 16 A: No.
- 17 Q: And you don't know whether he had any other
- 18 relationships before he passed?
- 19 A: No, I don't know.
- 20 Q: And you never volunteered to seek mental health
- 21 in your life; is that right?
- 22 A: Never.
- 23 Q: You never said to Read and Donna, I'll go get
- 24 help?
- 25 A: The subject never came up.

1 Q: Okay.

2 A: And the answer would have been no.

3 Q: All right.

4 MR. PARHAM: Take a break?

5 MS. GANES: Yeah, let's do that.

6 (Break from 11:26 a.m. until 11:38 a.m.)

7 BY MS. GANES:

8 Q: All right. Ms. Argoe, we talked about

9 Sistercare, which you listed, and Dr. Ross in

10 your discovery responses. Was there any other

11 entity like Sistercare that you ever sought

12 help from during your marriage or after your

13 marriage?

14 A: No.

15 Q: Did you ever -- I think I already asked this,

16 so I apologize. But did you ever have

17 counseling of any type when you were young,

18 even in school by a school counselor?

19 A: Oh, no.

20 Q: Or a church counselor?

21 A: No.

22 Q: Have you ever discussed your commitment with

23 Buss?

24 A: No.

25 Q: Or with Read or Donna?

- 1 A: No.
- 2 Q: Or with George Jr.?
- 3 A: No.
- 4 Q: You never called them up during that year or
5 after and said what happened or anything like
6 that?
- 7 A: Let's go back to George Jr. Husband, still in
8 the house. There was no discussion. He knew
9 I was mad.
- 10 Q: Because when you got out of the hospital, when
11 you were released from the commitment, you went
12 back to the home where George Jr. was living;
13 is that right?
- 14 A: No, I went to Beaufort.
- 15 Q: Okay.
- 16 A: And stayed in what I built and called the
17 mother-in-law room, which is a complete kitchen
18 and bedroom, bath, downstairs. I built it and
19 that's where I was. He and his wife lived
20 upstairs.
- 21 Q: George, III?
- 22 A: The third. That's where I went.
- 23 Q: All right. And did you ever speak to them
24 while you were living in the mother-in-law
25 suite and they were living in the home?

1 A: Oh, yes. I talked at that point in time to
2 them, but it was just a matter of getting me
3 fed, you know, getting me fed and daily
4 routine. The medicine is so debilitating that
5 it takes every ounce of strength to get up out
6 of bed and get showered. If you've never had
7 that medicine you just do not understand what
8 it's like. I think every doctor that ever
9 prescribes that medicine needs to have tried it
10 himself, that's what I think. But that's
11 Martha. Basically, he worked; she worked in
12 Charleston. That was about it.

13 Q: And where was George, Jr., the husband, at the
14 time?

15 A: In Orangeburg, as far as I know.

16 Q: And you two were separated?

17 A: Well, he was in Orangeburg and I was in
18 Beaufort.

19 Q: Okay. You were physically separated for sure.
20 Were there legal proceedings already at the
21 time of the divorce?

22 A: No.

23 Q: And did you have any communication with George
24 Jr. during that year after you were released
25 from the commitment?

1 A: He would come on the weekends and stay on the
2 sofa, and I would sleep in the bed, and go
3 back. That was -- oh, we went out on the boat
4 with other people. Other people.

5 Q: Who?

6 A: Son, wife.

7 Q: I'm sorry?

8 A: Son.

9 Q: Your son and his wife.

10 A: Wife.

11 Q: Anybody else?

12 A: I'm trying to think anybody else. Not that I
13 recall. And during those trips, I slept on the
14 sofa in the boat.

15 Q: Did you -- I'm sorry.

16 A: Again, the medicine is so debilitating, that's
17 about all -- that's the only way I could get
18 comfortable, let me put it that way. You're
19 not comfortable standing, you're not
20 comfortable sitting. You are comfortable
21 laying down, and naturally, you're going to try
22 to get in the position where you're
23 comfortable.

24 Q: Did you ever romantically reconcile your
25 marriage with George Argoe, Jr. after you were

1 committed? Did you ever have sex with him or
2 intimate relations?

3 A: Never. Nor for a time before either.

4 Q: Okay. And then when did you first seek a
5 divorce from him?

6 A: During the year that I was -- let's see. Well,
7 it's when I got to Jan Warner. I don't know
8 when that is.

9 Q: Okay. And don't tell me anything that you ever
10 talked to Jan about, but how did you get to
11 Jan? How did you find out about him? What led
12 you to Jan Warner?

13 **MR. DODSON:** Let me make an objection. If another
14 attorney referred you to Jan, don't answer that
15 question.

16 A: That's true.

17 Q: Well, who was the other attorney that you first
18 consulted with?

19 **MS. GANES:** I don't think that's true. I'm not
20 asking her anything she ever talked to that
21 attorney about. I'm not asking about any
22 substance of conversation, but if she saw a
23 lawyer who told her to go see Jan or who
24 referred her to Jan then --

25 Q: Well, what other lawyers did you consult with

1 or seek help from prior to Jan Warner?

2 **MR. DODSON:** You can answer that question.

3 A: Ken Mathews.

4 Q: Is he the only one?

5 A: Yes.

6 Q: Okay. Has anyone ever told you that they were
7 fearful for your safety because of your
8 behavior?

9 A: No. Because of my behavior? No.

10 Q: That's right. Okay. In the six months prior
11 to the time that you were committed in June of
12 2005, did anyone ever tell you that they were
13 afraid for your safety?

14 A: Never.

15 Q: Were you, during that six months, going out of
16 your house late at night?

17 A: Yes.

18 Q: Okay.

19 A: When it got -- the yelling and abusiveness got
20 to the point where I felt that it was dangerous
21 to my life, I would get in the car and ride off
22 and wait a reasonable amount of time until he
23 passed out, I thought -- it's a guess of course
24 -- and go back.

25 Q: Did you ever know that you were being followed

1 by Buss, your son?

2 A: No.

3 Q: Have you ever heard that?

4 A: No.

5 Q: You never saw Buss following you when you would

6 leave the house?

7 A: No.

8 Q: Has Buss ever been abusive to you?

9 A: Other than taking my property.

10 Q: Okay.

11 A: Do you consider that?

12 Q: Has he ever been physically abusive to you,

13 ever hit you or pushed you around?

14 A: Oh, no. Oh, no.

15 Q: Has he ever been known to you to be a heavy

16 drinker?

17 A: No.

18 Q: Or have any drug use that you knew of?

19 A: Never, no.

20 Q: Was he verbally abusive to you, Buss, your son?

21 A: No.

22 Q: What property do you believe Buss has taken

23 from you?

24 A: The Beaufort property that I built and two boat

25 slips.

- 1 Q: And was that property the subject of the
2 litigation among you and George Jr. and Buss,
3 III?
- 4 A: All right. Explain litigation.
- 5 Q: A lawsuit. Have you ever sued Buss over taking
6 your property or tried to get it back?
- 7 A: Yes.
- 8 Q: And what happened? What was the resolution?
- 9 A: He gave the property back and we dropped the
10 suit.
- 11 Q: What property did he give back to you?
- 12 A: Everything they took.
- 13 Q: The two boat slips and the Beaufort property?
- 14 A: Two boat slips and the Beaufort property.
- 15 Q: And was it your allegation that he took that
16 through a power of attorney?
- 17 A: Yes.
- 18 Q: Has Buss ever been made to pay you money?
- 19 A: No.
- 20 Q: Through any lawsuit?
- 21 A: No.
- 22 Q: How much is the mortgage on the screen
23 business? How much does he pay that mortgage
24 monthly?
- 25 A: Oh, monthly. It's 2,400 and something.

1 Q: And then your social security, is that through
2 George?
3 A: Husband.
4 Q: Junior, right? Is that's right?
5 A: Husband, yeah.
6 Q: You're collecting his social security?
7 A: Yes.
8 Q: And how much is that monthly?
9 A: Two thousand dollars.
10 Q: And do you have any social --
11 A: Plus, you know. Did I have any what?
12 Q: What were you saying? A little over \$2,000?
13 A: Yeah, I mean, not a lot.
14 Q: Did you personally have any social security to
15 collect?
16 A: No.
17 Q: Do you have any other sources of income other
18 than the mortgage and the social security?
19 A: No.
20 Q: Now, in this case, you were -- well, tell if
21 you remember when you were first involved with
22 the Orangeburg authorities related to your
23 commitment in 2005? Police.
24 A: When I first called the police, I don't
25 remember that.

1 Q: No, I'm sorry. Didn't the police contact you
2 to pick you up to take you to have that MRI?

3 A: Oh.

4 Q: That's what I'm talking about.

5 A: Well, it was in 2005. Lewis came home with a
6 policeman. I had moved out of the bedroom, had
7 my own bedroom, lock on the door. He came --
8 at noon I would go eat lunch. And I was fully
9 dressed leaving the room, look over the
10 balcony, up the stairs, and Lewis is standing
11 there with a policeman. And he said, this man
12 wants you to go with him. Well, I went out and
13 got in the police car.

14 Q: Did you ask any questions?

15 A: With Lewis, no.

16 Q: Did you ask the policeman any questions?

17 A: Yeah, I said, you know, where are we going?
18 And he said Orangeburg Mental Health.

19 Q: Had you -- I'm sorry.

20 A: Go ahead.

21 Q: Had you ever been to Orangeburg Mental Health
22 before that?

23 A: Never. Never.

24 Q: And you voluntarily walked and got in the
25 police car?

1 A: Yes.

2 Q: You didn't offer any resistance or say, I'm not
3 going, or anything like that?

4 A: No.

5 Q: Were you placed in handcuffs or any other kind
6 of restraint?

7 A: No.

8 Q: And did you have any questions for the officer
9 after you asked where you were going and he
10 said Orangeburg Mental Health?

11 A: You know, I don't remember that. I don't
12 remember the -- there was conversation, of
13 course, but I don't remember what it was,
14 except that I was totally blindsided and
15 surprised.

16 Q: Okay. Had you -- well, what happened when you
17 got to Orangeburg Mental Health?

18 A: We pulled in under a carport, and I went in.
19 Was told to sit in a room on the right with a
20 table. And Lewis followed us. He was there.
21 And I requested that the policeman come in the
22 room. He said he couldn't, but he would stand
23 in the hall in the open doorway, and he did.

24 Q: And Lewis was in the room with you?

25 A: And Lewis was in the room with me.

1 Q: Did you ask Lewis anything then?

2 A: No.

3 Q: Did you ask anybody at Orangeburg Mental Health
4 any questions on that day in June of 2005?

5 A: Anybody all day? Yeah.

6 Q: Related to why you were there and what was
7 going on?

8 A: I sat down at a table. First of all, I knew I
9 was getting ready to find out why. And sat
10 down at a table. Lew was across from me, and
11 I'm sitting in the room, policeman in the hall.
12 I had requested that he not leave me where he
13 couldn't see me, and he complied. So I was
14 sitting there, and all of a sudden, this door
15 opens and in comes a man that I don't perceive
16 to be a doctor. He was basically not clean,
17 scruffy, and I had no idea that he was even a
18 doctor. And he throws these pictures down in
19 front of me and says, "Do you see these?" And
20 I looked at him and said, "Yeah," you know,
21 "That's my room." And he said, well, he says,
22 "You're manic. You're depressive." And starts
23 screaming in my face, and I'm just sitting
24 there observing what's going on. And I tried
25 to explain to him that when I left to go eat,

1 my room would be totally disorganized and
2 things were thrown everywhere, and I would come
3 back and pick them up and hang them up. And
4 the next day I'd have to go eat and come back
5 and it would be the same thing. The picture
6 that really amazed me was the cat box. I had
7 an inside, outside cat that rarely used the box
8 in the first place; and in the second place, he
9 always covered his feces, never missed. And I
10 saw in the picture all these cat's feces laying
11 on top of the cat litter, which something I had
12 never seen before is that. And, of course, the
13 clothes were on the bed, don't remember about
14 being on the floor, but they were on another
15 chest that I had, and I had all those clothes
16 hanging up in that room, and it was smaller
17 than what I was used to naturally, so I had
18 some hanging on hangers over the door, but they
19 were all hanging up. And I'm just sitting
20 there looking. And I tried to explain to him
21 that this was what was happening. And there
22 was even a nurse, well, I guess a nurse, there
23 was a lady sitting there observing, and he
24 turns around to her and he says, "What do we do
25 with her?" And she says, "Let's send her to

1 the hospital." So I got in the car and went to
2 the hospital. But before that happened, I told
3 the lady that was sitting there, I said, "Look,
4 when I leave this room, I take some dental
5 floss and I put it in the door on the top so
6 that I can see if somebody has been in this
7 room," which I knew they had when I come back.
8 And I said, "When I come back, the dental floss
9 is gone or on the floor, so I knew somebody
10 else was going in there and doing it." And we
11 went back in the room after my demonstration.
12 I see Lewis, and who I learn later is a doctor
13 shaking hands, and the lady says, send her to
14 a hospital. So she had already said that, send
15 her to a hospital. And then I said, well,
16 would you let me show you something? And
17 that's when we went out and did the
18 demonstration.

19 Q: So the demonstration was the dental floss and
20 the door?

21 A: The dental floss and the door. I had to show
22 her what I was doing. And --

23 Q: Did you have dental floss in your pocket or in
24 your purse or something?

25 A: No, I just said I put dental floss up there --

1 Q: Oh, okay. I understand.

2 A: And when I come back it's gone. And so
3 hospital. We were going to the hospital, and
4 I rode with the policeman, and we went into the
5 hospital. Same thing, I requested he stay in
6 the room with me. He said he couldn't, but
7 he'd stay in the hall. Well, Lewis came in the
8 room and I sat and waited and waited and
9 waited. And then they came in and put a shunt,
10 a needle in my arm, in case. I didn't know in
11 case of what, but in case. And I went through
12 the MRI machine, came back, waited some more.
13 And the patrolman came in and told me that
14 there was nothing wrong, nothing wrong with my
15 MRI at all and that we were going back home and
16 that his duty was over. And I asked him
17 please, if we would stay and drive me back home
18 because I did not ride with my husband. He was
19 dangerous to ride with, in my opinion, and I
20 never rode with him unless I drove prior to
21 this. And so I asked him if he would stay and
22 drive me home even though it was past his
23 shift, and he agreed to do that. So we went
24 back to home. I rode in the police car; Lewis
25 followed us home. I went straight to my room,

1 shut the door, and that was it till morning.
2 Nobody -- well, I didn't have any supper that
3 night.

4 Q: Did you ever tell anybody at the hospital or at
5 the mental health facility not to touch you or
6 that you didn't comply with the treatment --

7 A: No.

8 Q: -- they were providing or anything like that?

9 A: No. In other words, did I fight them? Never.

10 Q: All right. And then how long was it before --
11 well, what happened between the time that you
12 got back home that evening and the next time
13 you saw an Orangeburg County Sheriff's Deputy?

14 A: Normal routine. I went in the bed and went to
15 sleep. And Lewis would run the television all
16 night long loudly. He could sleep through it;
17 I couldn't. This was in another room. There
18 were some nights that he would run up and down
19 the stairs and holler and rub things on the
20 wall, like I don't know what it was, make
21 noise. I don't recall that this was a
22 particular night of that. It was just a normal
23 night. And just -- he got up and went to work.
24 And I usually sleep late because I sleep better
25 when he's out of the house, and when he would

1 leave, I would sleep until 11 o'clock, and I'd
2 sleep soundly then. And I got up about 11 and
3 got coffee and dressed, showered, went out to
4 eat, on my way to eat. And I stopped at Belk's
5 first to pick up some things, some things that
6 I had already gotten, you know, they were --
7 I'm a sales shopper, and they'll hold them
8 until they go on sale the next day. And I did
9 that, I went in to get those. And I was in
10 Belk's and my cell phone went off, and it was
11 the same patrolman. And he said, I have an
12 order to pick you up. And I said, for what?
13 I had already been taken back home, spent the
14 night, went out to eat. He said, "Well, they
15 have given me these orders, and I have to come
16 get you." And he said, "Do you want me to come
17 to Belk's and get you, or do you want to go
18 home?" And I said, "Well, I haven't had lunch
19 yet." So he said, "Well, go eat your lunch and
20 I'll come get you at four o'clock, if that's
21 all right?" And I said, "Sure that's fine."

22 Q: And what was that officer's name?

23 A: I don't know.

24 Q: Well, when he told you that he was coming to
25 pick you up, did you say, oh, no, you're not,

1 or --

2 A: No.

3 Q: -- I'm not going with you or anything like
4 that?

5 A: No, I complied.

6 Q: Okay.

7 A: I did, I complied. And when I was brought up
8 in our house, you complied with the police and
9 you complied with the law and you didn't
10 question it.

11 Q: All right.

12 A: So I went home, put my things up, my cell phone
13 and personal things, put them up. And he drove
14 in at four o'clock, and I opened the door and
15 went out to get in the car. Of course, the
16 door was locked, I didn't realize that. He had
17 to come around and let me in. And he let me
18 in, and then of course, the back of the window
19 was always opened so we could talk, and no
20 cuffs or anything. And he said, "Do you know
21 anything about Aurora?" "No, never heard the
22 name." I said, "What is it?" And he said, "A
23 hospital in Aiken." And I, okay, you know,
24 whatever. And I'm sitting there thinking well,
25 when they see me, certainly this is going to be

1 over, you know. He didn't tell me a mental
2 hospital; he just said a hospital. So we just
3 rode to Aurora. And we got to Aiken, the
4 officer pulls off at a convenience store on the
5 corner. Before that his cell phone went off,
6 the officer's cell phone, and he took the call,
7 and evidently it was my ex-husband, because
8 Lewis, and they talked, and I couldn't hear.
9 And then when we got to the convenience store
10 before we got to the hospital, the officer
11 stops and waits, and we wait for him to get
12 there to follow us into the hospital.

13 Q: Okay. Now, do you know who Dr. David Steiner
14 is?

15 A: Yes.

16 Q: Do you remember Dr. Steiner?

17 A: Very vaguely, but I do remember him.

18 Q: Would you know him if he walked in the room
19 right now, assuming he looked the same as he
20 did when you saw him then?

21 A: I don't know.

22 Q: All right. And so when you got to Aurora, what
23 happened next?

24 A: Oh, they went the strip search. Take off all
25 your clothes, all your jewelry -- and yes, I

1 wore jewelry -- all heirlooms, nothing except
2 an engagement ring that Lew ever gave me. They
3 took all my jewelry, all my clothes, and had to
4 bend over and do and everybody looked.
5 Everybody you say, who is that? Two women in
6 a room looked. And do I have to go further on
7 that?

8 Q: It was just a -- it was a cavity search?

9 A: It was.

10 Q: Okay.

11 A: And put my clothes back on, I did. And then
12 they put me in a large room, and I'll never
13 forget how big that -- how large that room was.
14 It was cold. And they just put me in the room,
15 no explanation, no nothing. And the people
16 that were in there with me just came and
17 greeted me, you know, and I was -- told me
18 where I was and their names and --

19 Q: Now, did you understand at this time that the
20 officer had a court order that he had picked
21 you up on the day before and that he had picked
22 you up on on the day that you went to Aurora?

23 A: He said he had new orders.

24 Q: Okay.

25 A: He said they were not the same. He said they

1 were new.

2 Q: Okay.

3 A: I'm not sure he said new. I'm not sure he said

4 new. He said he had orders.

5 Q: Okay.

6 A: He had orders to pick me up.

7 Q: Now, you are not suing that police officer in

8 this case; is that correct?

9 A: That's up to my attorney.

10 Q: Okay. Well, in this lawsuit, the police

11 officer who picked you up is not a party; is

12 that right?

13 A: If that's what my lawyer says, yes.

14 Q: Okay. Well, do you know who you intended to

15 sue in this case?

16 A: How do I answer that?

17 **MR. DODSON:** You just do the best you can.

18 Q: I'm not asking you anything you ever talked to

19 your lawyer about. I'm asking you do you know

20 who you intended to sue in this lawsuit?

21 A: Yes. The --

22 Q: Okay. Did you intend to sue the officer who

23 picked you up?

24 A: I did not intend to.

25 Q: And was that because you're not mad at him

1 because he was following a court order to pick
2 you up?

3 A: That's right.

4 MR. DODSON: Object to the form.

5 Q: Okay.

6 A: Well, did I -- right, answer it?

7 MR. DODSON: Yeah, you can still answer.

8 Q: That's right. He was doing his job?

9 A: Yes.

10 MR. DODSON: Object to the form.

11 A: He has no choice.

12 Q: Because there's a court order to pick you up;
13 is that right?

14 A: That's correct.

15 Q: Okay. Now, when you got to Aurora and they put
16 you in the room, what happened next?

17 A: It was cold, I don't know if I told you.
18 People came to greet me. They told me where I
19 was. And they usually don't let new patients
20 go eat lunch, but they did me because they
21 usually make them eat by themselves. And they
22 -- I said, you know, let me, and they did.
23 They let me go eat with everybody else. And
24 came back. I remember telling a nurse behind
25 the desk what was going on. And we laughed,

1 she said, you've been living the War of the
2 Roses. I said, absolutely, that has been my
3 life, the War of the Roses. And we laughed
4 about things were going on. That was about it.

5 Q: Okay. And what happened next?

6 A: If you're asking me what was the first time I
7 saw Dr. Steiner, I don't remember when it was,
8 but I do remember the visit.

9 Q: Okay. And you don't know how long it was after
10 you got to Aurora that you saw Dr. Steiner?

11 A: I'm thinking it was the next day.

12 Q: Okay.

13 A: Because I was in the room sitting on my bed.
14 He didn't see me that day.

15 Q: And did you have any other patient in the room
16 with you?

17 A: No.

18 Q: Or were you in your room by yourself?

19 A: By myself.

20 Q: Okay. And tell me what your first recollection
21 of seeing Dr. Steiner was?

22 A: He came in the door, absolutely no bedside
23 manner. Asked me to squeeze his two fingers,
24 and I can remember thinking, you know, I have
25 a strong grip and I don't want -- I don't want

1 to hurt his fingers. And I told him I would
2 probably hurt them, and he said, no, I have a
3 secret way of doing it. And I asked him what
4 it was. He crossed them, that was it. So I
5 squeezed. He hit my knee to see how my
6 reflexes were. That was it, no conversation.
7 What happened? Why are you here? Nothing.

8 Q: Okay. And is that they only time you ever saw
9 Dr. Steiner?

10 A: No. I was called into a room with a table
11 across the hall, across the large room from my
12 -- across from my room, large room, table,
13 office with table. He said, I want you to take
14 these drugs, had them out on the table. I
15 refused medicine. There's nothing wrong and
16 I'm not taking those drugs. And he tried to
17 prescribe my regular hormones for me, but I
18 refused those because they're compounded in a
19 pharmacy for me. They're not the over-the-
20 counter regular hormones. So I refused, which
21 he was trying to give me. He was trying to
22 change my hormone program. And I knew that I
23 wasn't going to be there long; I was going to
24 be out taking my own. So I refused hormones
25 and refused all his drugs. And then he said if

1 you don't take these drugs you're going
2 straight to the state hospital. And I remember
3 sitting -- and he wouldn't listen. He would
4 not listen to me about that I didn't need to be
5 there, there was nothing wrong with me. And he
6 said, you take these drugs or you're going to
7 the state hospital. And I can remember sitting
8 there thing, well, drugged is drugged. I'd
9 just assume be drugged there as here. So I
10 refused them. And that was -- I never took
11 any, never. Not the first one.

12 Q: You never took medication at Aurora?

13 A: At Aurora.

14 Q: Okay.

15 A: Never did.

16 Q: So Dr. Steiner --

17 A: Yeah.

18 Q: -- accepted your refusal of the medications?

19 A: He didn't send two large men and a nurse in my
20 room with injections like they did at Three
21 Rivers. He didn't do that.

22 Q: Okay. So --

23 A: But he did -- he was very insistent that I take
24 these pills.

25 Q: But you didn't?

1 A: I did not. I refused.

2 Q: And he did not give you any medication by any

3 other means?

4 A: No.

5 Q: And so you never took any medication on the

6 order of Dr. Steiner?

7 A: That's right, only because I refused.

8 Q: Okay.

9 A: He was ready to prescribe it.

10 Q: Well, but to be fair, that's for him to say on

11 his part, right? You know why you didn't take

12 them, but you don't know what Dr. Steiner, what

13 was in his assessment; is that right? Or do

14 you?

15 A: What do you mean by that?

16 Q: Well, have you ever reviewed your medical

17 records from Aurora?

18 A: No. No.

19 Q: Have you ever personally read them?

20 A: No, I have not.

21 Q: Have you ever personally read any of your

22 medical records from any provider involved in

23 this case?

24 A: Never.

25 Q: All right. So is fair to say that this

1 lawsuit, as far as you're concerned, is related
2 to the care you received, not how any of it is
3 documented?

4 **MR. DODSON:** Object to the form.

5 A: I know one thing; he didn't listen.

6 Q: Okay. Let me ask my question a better way.
7 You never looked at the medical records in this
8 case; is that right?

9 A: No.

10 Q: So this lawsuit, as we sit here today, is not
11 based on anything that may or may not be
12 documented; is that right?

13 **MR. DODSON:** Object to the form.

14 A: May or may not be --

15 **MR. DODSON:** You can go ahead and answer.

16 Q: Are you suing because of the way anything may
17 or may not be written down, or are you suing
18 because of the actions of the doctors and
19 providers?

20 **MR. DODSON:** Object to the form. You can go ahead
21 and answer.

22 A: I would have to say actions since I never read
23 anything.

24 Q: Okay. Now, had you ever seen Dr. Steiner
25 before you saw him at the Aurora Pavilion in

1 June of 2005?

2 A: Never.

3 Q: Had you ever heard of him in any way?

4 A: Oh, never.

5 Q: Have you ever seen him since you've left the
6 Aurora Pavilion?

7 A: Not that I know of, no.

8 Q: Have you ever talked to him in any capacity
9 since you saw him in June of 2005?

10 A: No.

11 Q: Have you ever written him any letters of
12 complaint?

13 A: Oh, no.

14 Q: Or called his office to make any complaints?

15 A: No.

16 Q: Okay. Now, did you ever see Dr. Steiner again
17 at Aurora after you saw him at that table and
18 refused the medication?

19 A: No.

20 Q: Okay.

21 A: That I remember. Not that I remember.

22 Q: Now, is it your belief in this lawsuit, or
23 related to this lawsuit, that Dr. Steiner
24 personally did anything to intentionally cause
25 you harm?

1 MR. DODSON: Object to the form. You can go ahead
2 and answer.
3 A: He didn't follow the procedure and properly
4 exam a patient that was placed before him.
5 Q: What did you -- what do you remember saying to
6 Dr. Steiner?
7 A: Do I remember saying to Dr. Steiner?
8 Q: Right. What do you personally remember saying
9 to Dr. Steiner in your encounter with him in
10 June of 2005?
11 A: I probably told him that this was a spousal
12 abuse case because I told everybody else.
13 Q: Okay. Well, I've got to fix this --
14 A: I know.
15 Q: -- because of the jury, okay?
16 A: I know.
17 Q: Now, you understand that the oath that you've
18 taken for this deposition --
19 A: I do.
20 Q: -- is the same that you'll take in court?
21 A: I do.
22 Q: Okay. And so you only, and sometimes in the
23 deposition I've asked you things that you've
24 guessed or speculated about, but in this
25 instance, please only tell me things that we

1 would say in daily conversation that you can
2 swear to because that's what we're doing here.
3 What can you swear to the jury in this case
4 that you told Dr. Steiner in June of 2005?

5 A: That I didn't need the drugs, that I refused
6 the drugs, and there was nothing wrong with me,
7 it was my ex-husband -- well, my husband at the
8 time, it was his doing, and that's why I was
9 there.

10 Q: Okay. Is there anything else that you can
11 remember you told Dr. Steiner?

12 A: When I told him that, he went back to, you've
13 got to take these drugs or it's the state
14 hospital.

15 Q: Okay. Now, you never did go to the state
16 hospital?

17 A: Never did.

18 Q: Is that right? Now, do you understand that the
19 commitment of you in June of 2005 was pursuant
20 to a court order?

21 A: Yes, because --

22 Q: Okay.

23 A: -- the patrolman had it.

24 Q: Did you ever review the order or ask to review
25 it?

1 A: I asked to review it, and he told me he
2 couldn't let me see the papers. I was not to
3 see them.

4 Q: And do you understand that Dr. Steiner's
5 treatment of you was based on a court order?

6 A: No, I assumed that his treatment should have
7 been based on the patient.

8 Q: Well, right, fair enough. But do you have any
9 idea of whether Dr. Steiner had the authority
10 to not keep you at the Aurora Pavilion?

11 **MR. DODSON:** Object to the form.

12 Q: Meaning is it your belief that Dr. Steiner
13 could have said, all right, send her home?

14 A: It is my belief he should have done an
15 evaluation on me other than just reflexes.

16 Q: Beyond that, do you have any understanding of
17 what Dr. Steiner's role was related to the
18 involuntary commitment?

19 A: His role was?

20 Q: What his duties were related to that court
21 order?

22 **MR. DODSON:** Object to the form. You can go ahead
23 and answer. Ms. Argoe --

24 Q: And it's fine if you don't know, I don't know.
25 Sometimes it's things for experts to talk about

1 in a case, but --

2 A: Yeah, I agree with that one.

3 Q: -- but what I'm asking you is, do you
4 personally have any idea or any opinion that
5 you're -- testimony that you're going to tell
6 the doctor that you felt that Dr. Steiner had
7 to do related to that court order in June of
8 2005?

9 **MR. DODSON:** Same objection. But when you hear me
10 make an objection, unless I tell you otherwise
11 --

12 A: Okay.

13 **MR. DODSON:** -- you just go ahead and answer.

14 A: Well, I assumed that every doctor had the
15 ability to look at a patient and say she needs
16 drugs or she doesn't. I mean. And he never
17 even, he never did anything except reflexes.

18 Q: Well, he looked at you; is that fair?

19 A: Yeah, to do reflexes while I was sitting on the
20 side of my bed.

21 Q: Has any doctor or medical professional ever
22 criticized Dr. Steiner to you?

23 A: No.

24 Q: Did anybody visit you at the Aurora Pavilion
25 other than George Jr.?

- 1 A: No.
- 2 Q: And you never saw Dr. Steiner again after the
3 encounter outside of your room at the table; is
4 that right? That you know of?
- 5 A: I don't remember that, anything more with Dr.
6 Steiner, but let's going back -- Lewis, my ex-
7 husband, came with me to be committed. You were
8 asking me for visitors.
- 9 Q: Oh, okay, right.
- 10 A: Came with me to be committed, son came and got
11 my jewelry, whatever else, and said that I was
12 being moved. Told me that I was being moved
13 because my insurance was not paying at Aiken.
14 And then ex-husband comes to the hospital at
15 the point in time where I am put in the police
16 car.
- 17 Q: To go to the new destination.
- 18 A: Yeah. I mean, you asked me who visited me.
- 19 Q: Sure. Certainly.
- 20 A: If you consider that a visit, but I don't
21 consider it a visit, but you might. And then
22 when I went from the hospital to the police
23 car, Lewis says, "Take your medicine, take your
24 medicine." I remember him yelling, "Take your
25 drugs. You need drugs." I remember telling

1 him point blank, read my lips, no drugs, and I
2 got in the police car. And he didn't follow us
3 to Three Rivers.

4 Q: And did you ever have any further contact with
5 Dr. Steiner?

6 A: None that I recall.

7 Q: Okay. Now, did you have court appearances?
8 Did you ever present in a probate court after
9 you left the Aurora Pavilion?

10 A: There was some kind of a court in Three Rivers,
11 set up in the facility of Three Rivers.

12 Q: And did you understand that there were
13 appearances made where the court deemed your
14 commitment appropriate, lawful?

15 A: Are you talking about this, where they ordered
16 me drugs for a year? Are you talking about
17 that one?

18 Q: Right. Right.

19 A: I was very drugged when I went in there. I was
20 given a shot before I went in, and it's -- the
21 medicine is so debilitating that you can hear,
22 but it's hard to hold your head up and look,
23 and when you do look, sometimes it's a blur,
24 and you also are drooling from the corner of
25 your mouth from these meds. So it was, it was

1 difficult to understand exactly what was going
2 on, but I did tell -- there was someone that
3 was appointed from Orangeburg on my behalf, and
4 before I went in, I remember telling him about
5 the spousal abuse and explaining things to him,
6 and it didn't come up. All he said was, "These
7 things can be explained away, but."
8 Q: But what?
9 A: That's what he said, "These things can all be
10 explained away, but." And stopped there.
11 Q: Did you ask him but what?
12 A: No, I'm sitting there drugged and can hardly
13 hold my head up, drooling, and just barely
14 looking.
15 Q: Do you still have the same cell phone that you
16 had at the time?
17 A: No.
18 Q: What provider did you have in June of 2005?
19 A: Verizon.
20 Q: Was the cell phone in your name?
21 A: No.
22 Q: Was it in George Jr.?
23 A: Uh-huh (affirmative response).
24 Q: Is that a yes?
25 A: Yes. Family plan, I guess. I don't know.

1 Q: Have you ever been told that George Jr. had any
2 type of mental or psychiatric disorder?

3 A: No.

4 Q: Did you ever have an opinion that George Jr.
5 had any type of mental or psychiatric disorder?

6 A: Well, in hindsight, but not at the time, no.

7 Q: Okay. In your own words, and we have your
8 court filings, I'm not asking you anything you
9 ever talked to your lawyer about, why are you
10 suing Dr. Steiner in this case?

11 A: I feel that he could have stopped this,
12 prevented this. Initially analyzing what was
13 in front of him, he knew what he saw, he should
14 have, and he should have done something about
15 it. If he couldn't, he should have reported it
16 to somebody that could. And to me, any
17 responsible medical man that takes the oath,
18 the Hippocratic oath, as doctors do, should
19 have done this, and if not, his own conscience
20 should have kicked in.

21 Q: What was your relationship with Dr. Reamy?

22 A: Well, let's see, that was in Beaufort at
23 Coastal Mental Health, I might not have the
24 name right. And during the year that I was
25 court ordered to take drugs, he had to

1 administer what the court ordered him to do.

2 Q: And you didn't fault him for following that

3 court order; is that right?

4 A: No, he realized that I didn't need them, and

5 took me off the medicine as soon as he complied

6 with the court.

7 Q: So do you have any complaints with Dr. Reamy's

8 medical treatment of you?

9 A: No.

10 Q: Did you have a good relationship with him?

11 A: He listened to me.

12 Q: Do you think he was a good doctor?

13 A: I think he was a conscientious doctor.

14 Q: Okay. And --

15 A: The first man I had, the first conscientious

16 doctor I had seen.

17 Q: And did you have a respect for his opinion

18 related to your medical care?

19 A: Well, yes. When he did a proper analogy, yes.

20 He took time to speak with me.

21 Q: And Dr. Reamy did not immediately take you off

22 of the medication?

23 A: He couldn't. He was court ordered to give it

24 to me, and he complied with the court. But he

25 did -- he did reduce the dosage because he

1 realized I was not only taking medicine that I
2 didn't need, but the dosages were too great.

3 Q: Did Dr. Reamy ever tell you that he did believe
4 you were bipolar?

5 A: No.

6 Q: Did you ever ask him, doctor, do you think that
7 I have a psychiatric condition?

8 A: There is no need to ask; I knew I didn't.

9 Q: Okay. Did you ever ask him?

10 A: No.

11 Q: Well, then did you ever say, why are you, a
12 doctor, giving me medication that I don't need?
13 Court ordered or not, why are you doing it?

14 A: Well, I knew he had a court order, because it
15 was a --well, actually, I heard the gavel come
16 down, something you never forget when this
17 happens to you, and the judge says one year of
18 medicine. And I'm thinking, sitting there
19 thinking how am I going to live through another
20 year, a whole year of this medicine. I was
21 struggling with the time that I had.

22 Q: And were you off of the medication before you
23 sought out a lawyer? Were you done with your
24 treatment with Dr. Reamy and off of the
25 medication before you went to a lawyer?

1 A: I think so, yes. Yes, I think. As I recall,
 2 I was.
 3 Q: I don't --
 4 A: I'm not real sure on that, but if it wasn't, it
 5 was toward the end.
 6 Q: Okay. I'm just going to look at my notes, and
 7 I may have another couple of questions, but if
 8 you'll answer any questions that the other
 9 lawyers have.
 10 A: Okay.
 11 Q: Thank you.
 12 **MR. PARHAM:** Let's go off the record.
 13 (Break from 12:26 p.m. until 1:40 p.m.)
 14 BY MS. GANES:
 15 Q: I just had one question that I forget to ask
 16 and that is the truth, not like most lawyers --
 17 A: Oh, I believe you.
 18 Q: --- that have one question.
 19 **MR. PARHAM:** No sub-parts?
 20 Q: That's right. No sub-parts. And I apologize
 21 because I'm pretty sure I know the answer, but
 22 have you ever been arrested or charged with a
 23 crime other than a traffic offense?
 24 A: Never.
 25 Q: Okay. I don't have anything else.

1 A: I thought you asked that, but in a different
2 way.

3 **MS. ARGOE - EXAMINATION BY MR. HAILE:**

4 Q: Ms. Argoe, my name is Shelton Haile. I
5 represent Aiken Regional Medical Centers. Lois
6 El, the risk manager, is here with me and I
7 think you may know her.

8 A: I just spoke to her when the room cleared.

9 Q: I think that I heard this when Ms. Ganes was
10 asking you the question, but I'd like to
11 confirm it.

12 A: Okay.

13 Q: Did you ever take any medications while you
14 were a patient at Aurora Pavilion?

15 A: I did not, only because I absolutely refused.

16 Q: Okay. No one ever forced you to take any
17 medication?

18 A: They put them on the table and said take them
19 or you'll end up on Bull Street.

20 Q: And you never took them?

21 A: I never took them.

22 Q: When did you get to Aurora Pavilion? What time
23 was it on June the 8th, I think it was?

24 A: I don't really -- well, I tell you one thing,
25 it's before they ate supper, whenever that was.

1 Q: And you left Aurora Pavilion the next day on
2 June 9th; is that right?
3 A: I don't know the dates.
4 Q: Okay.
5 A: It's been a long time and I have been drugged
6 for 41 days plus a year. That's something I do
7 not remember exactly, but I remember leaving.
8 Q: Okay. If you don't remember the exact dates,
9 is it fair to say that you got there one day
10 and left the very next day?
11 A: It seems that way to me.
12 Q: Do you have any idea how many hours you were at
13 Aurora Pavilion?
14 A: Oh, no.
15 Q: What are your complaints of medical malpractice
16 against Aiken Regional Medical Centers?
17 **MR. DODSON:** Object to the form. Go ahead. You can
18 answer.
19 A: There was no psychiatric exam whatsoever, no
20 listening to me when I was trying to explain
21 what happened and that this was spousal abuse,
22 and I was just treated like a non-person, like
23 a run of the mill, put her in, drug her. And
24 I hate to think of people being treated that
25 way, including me.

1 Q: Do you have any other complaints of medical
2 malpractice against Aurora Pavilion?

3 **MR. DODSON:** Same objection. Go ahead and answer.

4 A: Medical, that's all I can think of medical.
5 But I was treated very badly in other ways from
6 the staff, not the patients.

7 Q: You understand the only cause of action
8 currently pending against Aiken Regional
9 Medical Centers is for medical malpractice?

10 A: Yes, I do.

11 Q: Who were the two women who witnessed the strip
12 search that you mentioned earlier?

13 A: Oh, I don't know. I don't know who they were.

14 Q: Do you remember what they looked like?

15 A: They were -- no. They were just two rather
16 hefty women, I remember that. And they both
17 had black hair. Other than that, I don't
18 remember.

19 Q: Were they black, white, or other?

20 A: I believe -- I believe -- I know one of them
21 was black. I know that. I believe the -- see,
22 there are degrees of skin here and I don't --
23 I don't really -- I don't profile. You know,
24 I really don't. In my mind they're just
25 people. But I believe -- I know one of them

1 was dark, was back.

2 Q: How old did the women appear to be?

3 A: Younger than me. I really don't know that, but
4 they were -- they were younger than I was
5 probably by a good bit.

6 Q: You also testified earlier that you spoke with,
7 I believe, a lady at a desk about what was
8 happening?

9 A: Yeah.

10 Q: And you talked about the War of the Roses,
11 etcetera?

12 A: Uh-huh (affirmative response).

13 Q: Do you know that lady's name?

14 A: I do not. I do not know. She was a nurse
15 behind the desk -- well, I say nurse, you know,
16 she was a lady behind the desk with scrubs on.

17 Q: Was this the front desk of the facility or the
18 nurse's station back in the back?

19 A: It was the nurse's station in the back.

20 Q: Do you remember what that lady looked like?

21 A: She was -- she was sitting down, of course.
22 She was probably -- she was bigger than me and
23 I'm bigger now than I was then. Since I've
24 been on those drugs, I have -- my body has
25 blown up from a two to a four to an eight and

1 it's just kind of -- I'm not eating that much.
2 So I was small then. She was larger than me,
3 taller probably, larger, and maybe Afro-
4 American, probably so. I considered her as
5 rather a friend. She was the one that said I
6 could go eat with the -- the others. I would
7 rather do that than have to sit and eat by
8 myself.

9 Q: Ms. Argoe, that's all I've got for you right
10 now.

11 A: Okay.

12 Q: Thank you.

13 A: All right.

14 **MR. COLE:** Do you want me to go?

15 **MR. PARHAM:** Yes.

16 **MS. ARGOE - EXAMINATION BY MR. COLE:**

17 Q: Ms. Argoe, my name is Andrew Cole. I'm here on
18 behalf of two people, both dealing with Three
19 Rivers. One is actually Three Rivers and the
20 other is Nurse Burrell.

21 A: Nurse Burrell.

22 Q: Ann Burrell. They're both listed in the
23 caption.

24 A: Okay.

25 Q: Let me ask you this first. Do you know why you

1 sued Ann Burrell?

2 A: She was there. She was -- she was part of my
3 treatment, I guess. She was there. I talked
4 to her. She never stood up. She never
5 listened to me.

6 Q: Do you know when you spoke with her?

7 A: No.

8 Q: Do you know what she looks like?

9 A: Vaguely. Vaguely I do.

10 Q: Can you describe her to me then?

11 A: You have to realize that when I saw her, for
12 the most part, I was drugged, and especially
13 that -- she was at the table when I was
14 sentenced with the gavel to one year on drugs.
15 And she was sitting to the left of Phyllis
16 Mobley and I -- she agreed with Phyllis' exact
17 words. I believe she was a black lady. And
18 again, I don't think of people, black or white,
19 purple, red or whatever, they're just people to
20 me. I was raised in New Hampshire and it goes
21 back to that, I guess. That just was not
22 ingrained in me when I was younger.

23 Q: So the hearing that you're talking about, is
24 that the hearing on June the 21st, 2005?

25 A: That's in -- that was in Three Rivers.

1 Q: Okay. And that was the one where the probate
2 judge was there?

3 A: There was a judge there.

4 Q: Do you know who that was?

5 A: Darlington. He was from Darlington. I don't
6 remember his name.

7 Q: Okay. Who else was there at that hearing?

8 A: Now remember, I'm drugged. There was Phyllis
9 Mobley, Amber. There was a man from Orangeburg
10 that had been appointed to speak for me, and
11 the first time I ever saw him was two minutes
12 before I went into the hearing. There was the
13 judge, me, and then my family that I no longer
14 talk to.

15 Q: Who specifically family members? Was it --

16 A: Lewis.

17 Q: Okay.

18 A: Son, sister, and brother.

19 Q: Do you recall if there was ever a tape recorder
20 or any other recording device during the
21 particular hearing?

22 A: I don't remember that. I don't remember that.
23 Remember, I could hardly hold my head up and I
24 was drooling from my mouth, and I would look up
25 every now and then to see who was there or who

1 was speaking. I'm not looking for a tape
2 recorder.

3 Q: Other than the people you just named, was there
4 anybody else in the room that you saw, didn't
5 recognize, or --

6 A: Oh, I don't remember.

7 Q: Okay.

8 A: As drugged as I was, I did well to see who --
9 who was there.

10 Q: You keep saying you were drugged --

11 A: I was drugged.

12 Q: How were you drugged during that hearing?

13 A: They gave me a shot right before I went in.

14 Q: Do you know what kind of shot it was?

15 A: Oh, no. Oh, no.

16 Q: How was that shot administered?

17 A: Injection.

18 Q: Was that -- did you voluntarily let them inject
19 you?

20 A: Let me put it this way. I refused all meds,
21 but when they come at you with a large or two
22 large men and a nurse, I can't win. So rather
23 than -- I just object and I always say write --
24 let it be on the record that I object to this.
25 Now, whether they write it down or not, I don't

1 know. But then I would comply and it would be
2 back here in my fanny because I don't want my
3 arms all marked up from needles.

4 Q: Okay. You said right before that hearing. Can
5 you give me a time parameter? Was that like
6 five minutes before? Was that a day before?

7 A: Ten -- no, ten or -- ten or -- five or ten
8 minutes, something like that.

9 Q: Where were you when that was administered?

10 A: There's a room that Phyllis Mobley talked to me
11 first before she went in.

12 Q: Okay. So you had a conversation with Dr.
13 Mobley?

14 A: Uh-huh (affirmative response).

15 Q: And then after that conversation, you were
16 given an injection?

17 A: Yeah. She left the room and I was injected.

18 Q: What was --

19 A: She was not there.

20 Q: Okay. What was the conversation you had with
21 Dr. Mobley at that time?

22 A: Dr. Mobley told me that she saw nothing wrong
23 with me, that if there was anything wrong, she
24 didn't see -- she didn't see it. And I am
25 thinking, well, this is not going to be a

1 problem. I'm going to be out of here. As soon
2 as I go to the hearing, she speaks, I'm gone.
3 Well, I didn't know I was going to get a shot
4 first before I went in there. And then I do
5 remember that the judge asked her, Dr. Mobley,
6 what she thought. And I looked over there, as
7 drugged as I was to see her, and she said I
8 think she has -- she has it, and she didn't say
9 what. And he said, do you think that she needs
10 to be drugged -- does she -- you think she
11 needs medicine. She said, yes, I do. I sank.
12 I mean, my heart just sank. You know, I'm
13 thinking, how am I going to get through a year
14 on drugs.

15 Q: When you just said that you heard Dr. Mobley
16 say during the hearing, I think she has it.

17 A: Yeah.

18 Q: What is the it?

19 A: She didn't say.

20 Q: Do you know what that is?

21 A: The drug -- the --

22 Q: No, no, no. No, I'm not asking what the drug
23 was. It sounds like you're saying she has it
24 as in that's some sort of a diagnosis or
25 something. Do you know what she's talking

1 about?

2 A: Oh, her exact words were, "I think she does."
3 The judge asked her -- you've got to realize
4 this has been a while --

5 Q: Right.

6 A: -- and I -- this is not something I enjoy
7 thinking about; it's nothing I try to think
8 about. The judge asked her, "Do you think she
9 needs medicine?" And she said, "Yes, I do."

10 Q: Okay.

11 A: And I just sank. I literally just sank.

12 Q: When you had that conversation with Dr. Mobley
13 before going into the hearing, did she tell you
14 what was likely going to happen or explain what
15 was going to happen?

16 A: Yes. It's going to be a hearing, your family
17 is there, and I don't see anything wrong with
18 you. I mean, what else does she need to say?

19 Q: Now, is that exactly what she said to you or
20 are you paraphrasing?

21 A: She, no -- that was paraphrasing. She said, I
22 don't see it. I do not see it.

23 Q: Okay. Do you know what she's -- what it is in
24 that context?

25 A: No. She said, I just don't see it.

1 Q: Okay. Had you had any --

2 A: Let me think about that.

3 Q: Go ahead.

4 A: I mean, this is something I don't think about.

5 Q: Well, this is my opportunity to understand what

6 happened because obviously I wasn't there, so

7 you know, that's why I like to tell people you

8 have a better chance of remembering because you

9 were there.

10 A: I wished I could have gotten to an attorney.

11 Q: Can you recall anything or do you want to move

12 on?

13 A: I'm going to say I don't remember that exactly

14 and we'll move on.

15 Q: Okay. Prior to that time you were just

16 describing, which would have been on the 21st

17 that you said you got an injection, when was

18 the time prior to that that you received any

19 medications?

20 A: The time before?

21 Q: Yes.

22 A: I really don't know. They regularly came down

23 the hall at night and got and -- no, the first

24 one was at night with the two big men that came

25 to get me.

1 Q: Okay.

2 A: That was -- and a nurse. That was like, I'm
3 guessing because I don't know, but I'd been a
4 sleep a while, it was in the night. And we
5 went to another room down the hall behind the
6 -- behind the desk, behind the desk that they
7 have. And I guess they thought I was going to
8 fight them. And I said I want it on the record
9 that I am refusing this, that I am not
10 voluntarily taking it. And, of course, they
11 say of course, it's on there. And these two
12 big men were standing there and the nurse with
13 the needle. And I pulled my pajamas down and
14 put it in my fanny and, of course, there again,
15 everybody looks. I mean, I -- you know, this
16 is a hospital here.

17 Q: Uh-huh (affirmative response).

18 A: And everybody looks. And before this happened,
19 I told the nurse, I said -- she had the shots
20 already in her hand. I said there's nothing
21 wrong, I said, because I had the MRI and there
22 was nothing wrong. So she looks in the
23 computer and said, oh, yes, there is, and comes
24 back in the room with the two men and the
25 needles and I get the injection. This time I

1 know it's Geodon. That's what they started me
2 on because I asked the name of the medicine and
3 I asked for paperwork on it. Of course I don't
4 have it now. And there were two shots. One
5 was Geodon and they didn't tell me what the
6 next one was. It was two shots. Well, I went
7 back to my room and it made me -- it made me
8 have breathing problems. I couldn't breathe.
9 And I remember sitting up in bed and I -- my
10 roommate was out cold, but that wouldn't have
11 helped anything. And I couldn't breathe; I
12 could not catch my breath. I remember sitting
13 up in bed. I remember trying standing up, and
14 I knew that I needed help. So I went down the
15 hall and I was actually so weak, I was weak in
16 my knees. Never had that experience before.
17 And I held onto the wall, got down the hall,
18 and there was, excuse me for paraphrasing, a
19 little girl behind the desk. She didn't look
20 like the regular staff. She was just a little
21 young girl and it was nobody I'd seen before.
22 And I told her I was sick and I needed some
23 help, that I couldn't breathe. And she says
24 you will have to sit in that chair right there
25 and wait for somebody to come out of a meeting.

1 They're all in a meeting and they can't be
2 disturbed. And I said, this is an emergency,
3 I cannot breathe. I need help now. "I'm
4 sorry, there's nothing I can do for you. You
5 can lay on that sofa or sit in that chair." So
6 I went back to my room hanging on down the
7 hall, and I saw up on the side of my bed and
8 then in my bed and I tried to get in the best
9 possible breathing positions. Then I
10 remembered my mother had asthma and she went to
11 Duke, went through all the tests, and she
12 learned breathing exercises. And I remembered
13 some of those breathing exercises (indicates),
14 and I did her breathing exercises for I don't
15 know how many hours and I got -- I got through
16 it. Laid back down for -- probably went to
17 sleep, and then about daylight someone comes in
18 and says, do you need some help, and I said,
19 not now, I'm through it. So they changed my
20 Geodon to Haldol and Risperdal. Now what order
21 or whatever I don't know.

22 Q: Okay, Let me go back and try to clarify --

23 A: Okay.

24 Q: -- some of what you had there.

25 A: All right.

1 Q: First, the first injection -- well, let me ask
2 you this first --

3 A: Is injection, yes.

4 Q: Right. Did you ever take any medications while
5 at Three Rivers through taking pills or liquids
6 or anything like that?

7 A: Yes.

8 Q: Okay.

9 A: After the injections, I was required to get in
10 the med line at night, and they had, I believe
11 it was Risperdal. I believe that's what I had.
12 And I had to go through the med line. They
13 would give me the meds and look in my mouth to
14 be sure that I swallowed it. Now, after --
15 they weren't really consistent on what time the
16 med line -- the med lines would come through,
17 and I had arrangements with my roommate. She
18 would use the shower for her hair in the
19 morning; I would do it at night. So as soon as
20 I got my meds, I would go down the hall and get
21 in the shower so I could do it before curfew.
22 And they would always follow me to my room and
23 -- and check to see what I was doing in there.
24 Well, I was in the shower and -- what else?
25 Oh, then they did switch from the regular

1 Risperdal to something that had the consistency
2 of a marshmallow and it would poof in your
3 mouth. You didn't have to swallow it, it would
4 poof. And they put me on that so that I
5 couldn't spit it out like they thought I was
6 doing.

7 Q: Did you ever spit out any medication?

8 A: No.

9 Q: The first --

10 A: First of all, you couldn't, the thing
11 (indicates).

12 Q: Well, if you had just the pills, though that's
13 --

14 A: No. No. How could I spit it out? They looked
15 in my mouth. I mean they look -- stick out
16 your tongue, look this way, that way, up, I
17 mean, how -- how could I spit it out. It had
18 to be down before they released me to go back
19 to my room, and yet they still followed me back
20 to the room.

21 Q: Okay. Did you -- or the first medication that
22 you received, was that by injection?

23 A: The Geodon was.

24 Q: Okay. Was that the first medication you
25 received when you were at Three Rivers?

- 1 A: Yes.
- 2 Q: Okay. How soon after you arrived at Three
3 Rivers do you recall that you received that
4 injection?
- 5 A: I recall that I stayed there, and now don't --
6 not -- approximately, I don't know exactly, you
7 lose track of days, approximately shy of,
8 probably shy of four or five days, something
9 like that. And I'm guessing on that. I don't
10 know.
- 11 Q: All right. So it wasn't the day you arrived?
- 12 A: Oh, no.
- 13 Q: It was a couple of days after that?
- 14 A: Yeah.
- 15 Q: Okay.
- 16 A: Of course they were trying to get me to take
17 it, and I was refusing.
- 18 Q: Okay.
- 19 A: I, you know, refused.
- 20 Q: What were they trying to get you to take? Was
21 it Geodon or was it something else that they
22 were asking you to take before you got that
23 injection?
- 24 A: I don't know. I didn't -- I wasn't taking
25 anything. It didn't matter what they were

1 asking.

2 Q: Was that a similar way that they would put it
3 out in front of you and say you need to take
4 this, and then you said, I'm not going to take
5 it?

6 A: You went through the med line in Three Rivers,
7 and they would make sure that you did and come
8 get you if you didn't make the med lines.

9 Q: Right. And what I'm trying to figure out is
10 prior to the first injection --

11 A: Injection.

12 Q: -- did they give you the pills and you just
13 said I'm not going to take them and gave them
14 back?

15 A: No. I never saw a pill until after the first
16 injection.

17 Q: So you weren't asked to take anything before
18 you got the --

19 A: Oh, I was asked to, yeah, but I wasn't forced
20 to.

21 Q: Okay.

22 A: Now, after that, I was forced.

23 Q: All right. And I'll ask you about that in a
24 second. The injection with the Geodon --

25 A: Geodon.

1 Q: Geodon, okay. Were you actually physically
2 held in place or anything like that?

3 A: I was not because I didn't fight. Had I
4 fought, there was no question in my mind I
5 would have been held down. I mean, what else
6 were the two big guys there for with the nurse.

7 Q: Okay. But they weren't holding you or doing
8 anything like that?

9 A: Because I didn't fight. That's the only
10 reason.

11 Q: Okay.

12 A: If I had physically refused, I am sure I would
13 have been held and, you know, you don't fight
14 battles you can't win, and I wasn't going to
15 win that.

16 Q: What did those two gentleman look like?

17 A: Big, black men.

18 Q: Do you know what their names were?

19 A: No.

20 Q: Do you know what position they held?

21 A: No. But I assumed that they were orderlies
22 that worked at the hospital at night, but I
23 don't know that. They obviously worked at the
24 hospital.

25 Q: And do you recall what time was this injection

1 administered?

2 A: I don't know that, but I'd been asleep a while.
3 Lights had been out and I'd been asleep a
4 while.

5 Q: What time was curfew?

6 A: I don't remember. I don't remember. Do you
7 want me to guess?

8 Q: I don't need you to guess. There's curfew --
9 you have dinner and have some time and then you
10 have curfew?

11 A: Dinner, meds, time, and that's the time that I
12 would wash my hair, go to bed with it wet
13 because I wasn't allowed a hair dryer.

14 Q: Okay. Do you know what the name of the nurse
15 was?

16 A: No. No.

17 Q: Okay. Can you describe what the nurse looked
18 like that administered the Geodon?

19 A: You know, I don't ever remember -- well, maybe
20 there was one the first night, but other than
21 that first -- the Geodon yeah, it was a white
22 lady.

23 Q: Okay.

24 A: And her hair was, I don't -- when I say kinky,
25 I don't mean --

- 1 Q: Like a lot of small curls?
- 2 A: -- offensive, I mean it just came in very, very
- 3 tightly curled.
- 4 Q: Okay.
- 5 A: And it was neat. I don't mean anything
- 6 offensive by that.
- 7 Q: Who did you ask for literature on that
- 8 particular medication?
- 9 A: Well, it was obviously one of the female
- 10 nurses, and it may have -- it was probably the
- 11 next day when I realized that I was having a
- 12 reaction to it. And I don't know who the staff
- 13 was. Staff is the term, not nurse.
- 14 Q: Why do you say staff not nurse?
- 15 A: Because that's what we called them staff. All,
- 16 everybody was staff.
- 17 Q: Okay. Whether they were an orderly or a nurse
- 18 or a doctor, they were staff?
- 19 A: Yeah, it's staff. Yeah. It's kind of a loose
- 20 term that I learned.
- 21 Q: Now, who uses that term? Is that --
- 22 A: The people that are in there with me.
- 23 Q: Okay.
- 24 A: And I picked it up.
- 25 Q: The literature that you received, what was

1 that?

2 A: It was a printed out sheet from the computer on
3 Geodon and whatever the effects or whatever.
4 I don't know.

5 Q: When you received the literature, that was
6 after you spent the night doing your breathing
7 exercises?

8 A: Yes. Yes. That was -- I've had horrible
9 nights, but that was one, I'd put that up there
10 with one of the most frightening. When you
11 can't breathe and there's no help and you can't
12 get help and you're in a hospital, that's
13 pretty frightening.

14 Q: Did you ever pass out?

15 A: If I did, I didn't know it. My reasoning is
16 that I didn't.

17 Q: Did your roommate wake up?

18 A: No, she did not. She was very drugged.

19 Q: Other than the little girl you described who
20 was at the desk, was there anybody else that
21 saw your reaction?

22 A: No. No, and the hall was dark. It was not
23 lighted very much. Rather dark. I would say
24 rather dark.

25 Q: Were there lights on, or was it just completely

1 pitch black?

2 A: Probably the hall was pitch black and there was
3 a light over the station where she was sitting.

4 Q: What do you recall from reviewing that
5 literature about the drug?

6 A: I don't remember anything that it said.

7 Q: Have you looked it up again at some point?

8 A: No. Again, this is not something that I want
9 to remember.

10 Q: And so then after that you started taking
11 pills, and then the marshmallow drug that you
12 were describing. Were you also receiving some
13 subsequent injections?

14 A: Yes.

15 Q: How many injections total did you get?

16 A: I -- I don't know that. I do not know that,
17 but every now and then, and this would be in
18 the afternoon because I would try to take a nap
19 in the afternoon. The medicine is so
20 debilitating, it was wearing me out just
21 fighting the effects of the drugs. It wears
22 you out, and I would take a nap in the
23 afternoon when I was allowed to, clothes on in
24 the bed and they would come down and get me.
25 Shut the door of the room and I'd go over to

1 the side because I preferred not to be on the
2 camera, so we found a place in the corner where
3 no camera could see us, and that's where I was
4 administered the shot.

5 Q: Okay.

6 A: And there were two nurses for that.

7 Q: And at anytime that you received any of the
8 medications, whether it's by pill or by shot,
9 were you ever physically held down or anything
10 like that?

11 A: Again, I would have been had I fought them
12 physically, but I did not fight physically.

13 Q: What names of people do you recall that worked
14 at Three Rivers that you saw?

15 A: Well, the main lady that dispensed the medicine
16 was Rose.

17 Q: Rowe?

18 A: Rose.

19 Q: Rose. Okay.

20 A: Rose.

21 Q: Did she do anything other than hand out the
22 medications?

23 A: Well, she was a nice lady. She mingled. I
24 remember her as a nice person, but she had her
25 job to do. Names I don't -- I don't really

1 remember.

2 Q: Did you do anything to prepare for your
3 deposition today?

4 A: No, other than try to control my diarrhea so
5 I'm not in the bathroom all the time. No, I
6 didn't.

7 Q: Did you read through anything?

8 A: Never.

9 MR. DODSON: Objection to the form. Don't answer
10 that question to the extent that it asks you to
11 describe what you did with me.

12 A: Okay.

13 Q: All right. Let me clarify that question. So
14 again, did you read any prior depositions that
15 were taken when this case was in a prior
16 version when it was filed on the coast?

17 A: I did not read depositions.

18 Q: Have you ever read any of the depositions?

19 A: No, because I was there. I was there for -- I
20 didn't read them. I was there.

21 Q: So all the depositions that have been taken
22 related to your issues, you were present in the
23 room for all those?

24 A: As far as I know. Now, if it came to the
25 nurses, I wasn't. I don't remember any of them

1 being -- no, I don't -- I don't remember
2 anybody medically being -- giving deposition.
3 I was not there for that.

4 Q: Okay.

5 A: I was just there for really the legal -- that's
6 the way -- is that all right to say that -- I
7 mean, can I answer that? I was there for the
8 -- no. I never sat through a medical
9 deposition.

10 Q: Okay.

11 A: And again, I have to think. It's been a while
12 of a very unpleasant situation and a very
13 unpleasant time in my life.

14 Q: And then you also attended the Supreme Court
15 hearing?

16 A: I did.

17 Q: And that was both of them, the Jan Warner one
18 and then the Psychiatric Solutions one? The
19 first and the second?

20 A: Yeah, first and second.

21 Q: Okay.

22 A: Thank you for clarifying that.

23 Q: You're welcome. I think you said earlier, you
24 haven't kept a diary --

25 A: No, I have not.

- 1 Q: Or any written notes or anything like that?
- 2 A: I did not.
- 3 Q: Have you ever written any letters to anybody
- 4 describing your experience through this?
- 5 A: No.
- 6 Q: Prior to your involuntary commitment in 2005,
- 7 did you have any like vacation videos or
- 8 anything like that that you have?
- 9 A: No. We didn't have vacations. I don't -- no.
- 10 Q: Have you seen any doctors other than the ones
- 11 that you saw at either Aurora or Three Rivers
- 12 or your treating physicians? Have you seen
- 13 anybody else for your medical health?
- 14 A: No. You have a list of everybody. I --
- 15 there's nobody I forgot -- I hope I didn't
- 16 forget. There's nobody -- there's nobody on
- 17 there that I didn't disclose.
- 18 Q: And you're currently not attending therapy or
- 19 anything like that?
- 20 A: No. Nor was I ever at any point in my life
- 21 ever.
- 22 Q: What position did Tory Woods have at the
- 23 Cracker Barrel?
- 24 A: Tory Woods. He was a manager.
- 25 Q: Did you work with him or was he just someone

1 that worked there?

2 A: Well, he was -- he was a manager at Cracker
3 Barrel, probably an assistant and -- did I work
4 with him? Yes, when he -- when he stepped in
5 and worked in retail, I worked with him. When
6 he was in the kitchen, I didn't work with him.
7 You see what I'm saying?

8 Q: Now, you said you worked at Cracker Barrel for
9 about 14 months or so?

10 A: Maybe even longer. I just --

11 Q: What were your typical hours when you were
12 there?

13 A: I would work in the evening. In the evenings.

14 Q: And I'm not quite certain about the time frame,
15 was this before you went to the facilities, or
16 was this after?

17 A: This was after.

18 Q: Okay. Did you ever work at Cracker Barrel
19 prior to it?

20 A: No.

21 Q: How soon after you were released from the
22 facilities did you start working at Cracker
23 Barrel?

24 A: It was after I was over the court ordered
25 medicine, I know that.

1 Q: So at least that 12-month time period after --

2 A: Yes. Because I couldn't function before, not
3 well enough to hold a job. Now if -- did it
4 overlap? I don't know. I mean, did it overlap
5 a week, a month, I don't know. But you -- Dr.
6 Reamy was decreasing my medicine all along, so
7 I was able to function better as time went on,
8 so I'm not exactly sure. For some reason, it
9 rings a bell -- I guess, I should say I don't
10 know, but for some reason I think I went to
11 work in May, you know, and I probably should
12 put an I don't know on that one, but --

13 Q: Okay.

14 A: You see what I'm saying.

15 Q: What about a Ms. Karen, who is she at Cracker
16 Barrel?

17 A: She is -- well, not now, but she was the
18 manager when I worked there.

19 Q: Do you know where she is now?

20 A: No.

21 Q: You testified earlier that there was a letter
22 sent from your attorney to your former
23 husband's attorney that essentially asked him
24 not to bother you at the Cracker Barrel. Was
25 Ms. Karen the manager that received that or was

1 that someone else?

2 A: Ms. Karen -- the letter was given -- let me
3 think -- let me think on that. The letter was
4 from Jan Warner to Ken Lester, my husband's
5 attorney, and a copy was given to me to take to
6 Karen, and I did.

7 Q: When you were staying at Three Rivers, did you
8 ever say to anybody that you think you needed
9 treatment?

10 A: Never.

11 Q: So you were consistent saying you never needed
12 treatment?

13 A: Without failure.

14 Q: The neighbor that you describe who came in to
15 visit you that one time, what was her address?

16 A: She lived across the street on Putter Path.

17 Q: Okay. Did you give her -- I don't know if --
18 did you give us her name? Or what is her name,
19 let me just do that?

20 A: Jane Edenfield.

21 Q: Do you know if she's still there?

22 A: I know she's not there.

23 Q: Oh. How do you know she's not there?

24 A: Because she moved.

25 Q: Do you know where she moved?

- 1 A: To Lexington.
- 2 Q: Lexington, South Carolina?
- 3 A: Yeah.
- 4 Q: Do you know if she's still in Lexington?
- 5 A: No, I don't know.
- 6 Q: And after that visit, you haven't spoken to
- 7 her?
- 8 A: No. No.
- 9 Q: In your discovery responses, one of the
- 10 responses notes that your brother was a
- 11 treating physician for you. What had he ever
- 12 treated for you?
- 13 A: Well, there was a facelift in Tampa, Florida,
- 14 when he practiced there. And then the meds
- 15 that went along with that, that was extensive
- 16 surgery and I had maybe a day or so on whatever
- 17 he gave me, and I don't know what that was, but
- 18 that's, you know, that was over. That's all I
- 19 recall.
- 20 Q: That's Read is who we're talking about?
- 21 A: Read, yeah.
- 22 Q: When did you get that surgery?
- 23 A: Gosh. I looked it up and I don't remember. I
- 24 looked it up because his -- it was right before
- 25 his second child was born, but I don't -- I

1 don't remember the date.

2 Q: And that's -- if I remember correctly, you said
3 the oldest child is 18 and the second one is
4 still in high school?

5 A: Yes.

6 Q: Okay.

7 A: It fell within the line, you said you wanted
8 everything since '95 and it fell within that
9 line, so I included it.

10 Q: Okay. And other than that facelift and the
11 medications, I would assume pain medications --

12 A: Yeah.

13 Q: -- that went along with that, has he ever
14 prescribed you any other medications or helped
15 you with that?

16 A: Not since -- not since '95.

17 Q: Okay.

18 A: That I recall. Let's say that I recall.

19 Q: Okay.

20 A: Okay.

21 Q: Any other surgeries that you have received, or
22 undergone is probably a better word?

23 A: Well, I have had a hysterectomy, gallbladder,
24 appendix and tonsils when I was -- my father
25 did that. That was before -- I was -- I don't

1 know how old.

2 Q: When you and your former husband were together,
3 did you have separate bank accounts or the same
4 bank accounts?

5 A: Everything was separate except one account that
6 was -- that \$300 a week for groceries, and I
7 was supposed to live on that. And that was
8 given to me, thrown on the counter in the form
9 of a check and I would deposit it in the bank.

10 Q: Well, how did the amount of \$300 per week come
11 up?

12 A: From his head.

13 Q: What type of stuff were you required to
14 purchase with that?

15 A: Food, laundry, any cosmetics I needed, anything
16 for me personally, and of course it didn't take
17 care of it.

18 Q: Were you buying food for the household, or was
19 that just for your consumption?

20 A: For the household. I was required to cook
21 supper.

22 Q: Did you cook supper?

23 A: For a while I did. For a while I did. He was
24 on the Atkins Diet and right in 2000 -- well,
25 I can't come up with a time frame, but he was

1 on the Atkins Diet, that was steak and slaw
2 every night, and that's what I would do. And
3 then things got so bad that I just stopped
4 cooking and went out. I mean, it's --

5 Q: What type of things did you want to buy that
6 you were not able to?

7 A: I bought them because I used my money. So, but
8 he never provided anything for me personally,
9 no clothes. No clothes. And anything that I
10 needed other than -- in other words, I had \$300
11 to do the house and whatever else I had to kick
12 it in.

13 Q: Who paid the mortgage on the house that you all
14 were living in?

15 A: We had none.

16 Q: Okay. Did you have car payments?

17 A: No.

18 Q: Who bought the fuel for the cars?

19 A: That was a credit card of his.

20 Q: Who paid for the utilities in the house?

21 A: Oh, he did, but the house was in his name.

22 Q: How did you pay for the mortgages or other
23 expenses for your other properties?

24 A: My IDS account. My IDS account paid for that.

25 Q: And again, that was the stuff that came through

- 1 your inheritance?
- 2 A: Yeah.
- 3 Q: You testified at your brother's divorce?
- 4 A: I did.
- 5 Q: Which divorce was that? You said he's been
- 6 married three times.
- 7 A: The second one.
- 8 Q: Do you remember what you testified about?
- 9 A: Yes, I actually do. There was a safe that,
- 10 first of all, I helped him move from Beaufort
- 11 to Tampa physically with a truck and I went
- 12 with him to get settled. There was no woman in
- 13 his life. And for some reason there was a big
- 14 deal about a French safe that he had and his
- 15 second wife was wanting claims to it, and she
- 16 was saying that it was hers. Well, I know it
- 17 was his because we moved it, so I just had to
- 18 say that we moved it, and that was about it.
- 19 Q: Okay. Do you still have the property in North
- 20 Myrtle Beach?
- 21 A: I do.
- 22 Q: And that's being rented right now?
- 23 A: No. I am redoing it, remodeling it. It's
- 24 time.
- 25 Q: Are you going to sell it, or what are you doing

1 with it?

2 A: I don't know.

3 Q: The house in Beaufort where Buss was living, is

4 he still there?

5 A: No.

6 Q: When did he move out?

7 A: When I got to Jan Warner, he was either evicted

8 -- well, he was told to go. If he didn't, he

9 was going to be evicted, and I don't know. I

10 don't know which one it was.

11 Q: And is that your current residence?

12 A: That's where I live.

13 Q: Okay. What about your property up in New

14 Hampshire, what have you done with that?

15 A: Well, by the time I got everything back, I was

16 down to one piece of property.

17 Q: Now, is that because -- or the New Hampshire

18 property was part of the inheritance that you

19 and your siblings received, correct?

20 A: Yes.

21 Q: And were you selling off parts of that land to

22 get your -- to get money, essentially?

23 A: No. That land just sort of -- just

24 disappeared. It just sort of disappeared.

25 This is -- I got -- I had it when I went in.

1 When I got back, I didn't have -- I was down to
 2 one piece of property, but no, that's it.
 3 Q: All right. I don't understand that. So before
 4 -- are you talking about before you were --
 5 A: Committed.
 6 Q: -- committed. Okay. You had land up in New
 7 Hampshire?
 8 A: Yes. I thought so. Yeah, I thought I did.
 9 Q: What did you think you had up there?
 10 A: Several pieces of property.
 11 Q: Now, what kind of property did you think you
 12 had?
 13 A: Just -- just lots.
 14 Q: Where were they?
 15 A: In New Hampshire.
 16 Q: Well, I mean, can you narrow down New Hampshire
 17 for me? That's still a pretty big state.
 18 **MR. DODSON:** New Hampshire is a pretty big state?
 19 **MR. COLE:** Well, it's bigger than Rhode Island.
 20 Q: I'm trying to figure out where -- I'm just
 21 saying New Hampshire -- I'm trying to figure
 22 out can you narrow it down where in New
 23 Hampshire?
 24 A: Where in New Hampshire? Well, can I get you --
 25 I don't know. I don't -- I don't remember the

1 properties exactly. I remember that I ended up
2 with one in Claremont. Let me explain.

3 Q: Go ahead.

4 A: That came from tax sales years ago. My father
5 would go to -- send someone to tax sales, so
6 they'd be in the middle of nowhere.

7 Q: Okay. So your father had a lot of parcels all
8 over the place because he bought them at tax
9 sales and that was part of the inheritance that
10 somehow was divided between you and your
11 siblings?

12 A: That was always ours. That was in -- that was
13 put aside for us.

14 Q: And that was in a family trust?

15 A: No, that was given to us outright. In other
16 words, it was never -- it was Lewin Forest. He
17 did this with his friend, Arthur Davis, who was
18 a lumberman in Claremont, New Hampshire. He
19 had two boys. It was Northern Forest Products.
20 He dies. The boys want to separate. His boys
21 want to separate from us. They're older. So
22 we divide it then, and then it becomes Lewin
23 Forest, Inc. And in '94, we divided our shares
24 into individual ownership so each one of us
25 could do something with it.

1 Q: So when that division happened in 1994, were
2 you actually given specific deeds?
3 A: Yes.
4 Q: Okay.
5 A: Yes.
6 Q: Okay. And then who did you have or did you
7 have somebody managing those properties?
8 A: Well, what do you mean managing? It sat there.
9 Q: So you didn't do anything with them?
10 A: I logged some of them because I needed the
11 money for the taxes.
12 Q: So these were just open lots with timber on
13 them? No houses or anything?
14 A: No houses, no. Now, this is New Hampshire
15 we're talking about?
16 Q: Right.
17 A: Okay.
18 Q: Okay. And were you selling any of the lots
19 themselves for the next ten years, '94 to 2004?
20 A: I did not. Oh, wait a minute. One. There was
21 one I sold in Newport. Now, the reason for
22 that was that I needed -- I did a 1031 exchange
23 for a piece of property I had on the waterway
24 for my son's house in Greenville, and I needed
25 extra money because I didn't have quite enough

1 for the house that he wanted. So I sold a
2 piece of property in Newport. And that's all
3 I recall right now. And all that money went
4 into his house.

5 Q: In 1994, when you received your interest from
6 the prior family ownership, do you know how
7 many lots you actually owned?

8 A: Oh, no. No.

9 Q: Okay.

10 A: And I've lost all those records.

11 Q: Okay.

12 A: I don't know.

13 Q: Do you know what happened to those records?

14 A: They were in the paperwork that Lewis was
15 carrying to the dump that I called the police
16 on the first night and he got -- or the first
17 time I called the police. And he got away from
18 the house and I never saw them again.

19 Q: Do you know when that first call to the police
20 was?

21 A: No.

22 Q: Can you give us -- you were asked before -- can
23 we put it around a holiday or another life
24 event that can help us determine what that time
25 frame was?

- 1 A: I don't think so.
- 2 Q: So prior to your commitment, what was your
- 3 understanding of how many parcels you owned up
- 4 in New Hampshire? Can you tell me sitting here
- 5 today, I know I owned X number of lots up in
- 6 New Hampshire?
- 7 A: I can't tell you how many lots I owned New
- 8 Hampshire.
- 9 Q: Well, your testimony is that you believe after
- 10 you got out you had fewer lots than you had
- 11 when you first got in?
- 12 A: Definitely.
- 13 Q: What do you know happened to those lots that
- 14 you believe you had and didn't have?
- 15 A: I don't know.
- 16 Q: Okay. Have you done any follow up on that to
- 17 see what happened to those?
- 18 A: Very little, but some.
- 19 Q: All right. Well, what do you know happened
- 20 with those then?
- 21 A: I don't.
- 22 Q: Have you ever had an investigator or anybody
- 23 else go and try to search that out for you?
- 24 A: No.
- 25 Q: Do you currently own any lots up in New

1 Hampshire?

2 A: One.

3 Q: Where is that located?

4 A: Claremont.

5 Q: Okay. And again, that's just timber or

6 something like that?

7 A: It's never been logged to my knowledge. It's

8 also the least desirable. It's landlocked.

9 Q: The properties around it that lock it in, are

10 those owned by your siblings or are they --

11 A: I don't know who owns them.

12 Q: Okay. Have you ever been to that property?

13 A: No.

14 Q: You also owned a house at 537 Willington Lakes

15 Court in Orangeburg?

16 A: No. That -- that's an apartment I rented when

17 I left -- when I left Lewis.

18 Q: Okay. When you find yourself under stress,

19 what do you do to try to get past that?

20 A: Find myself under stress? I seem to have the

21 ability that when it gets quiet, I just relax.

22 I seem to have that ability that I've acquired

23 over the years, I guess.

24 Q: The physical threats that you've testified

25 about so far where you said that your former

1 husband hit you on occasions --

2 A: Yeah.

3 Q: -- and I think you testified that you actually

4 called the police on a couple of occasions?

5 A: Yeah.

6 Q: Can you give me the names of anybody who

7 witnessed any time that your former husband

8 actually struck you?

9 A: No. No. He would never do anything where he

10 would be caught, ever.

11 Q: Can you tell me any locations where he struck

12 you?

13 A: At home.

14 Q: Anywhere else?

15 A: No. Always at home.

16 Q: When he did that, did he do it with a hand or

17 did he have --

18 A: A hand.

19 Q: -- anything else, pick up anything or anything

20 like that?

21 A: No. Hand.

22 Q: Where would he actually strike you?

23 A: Once it was on the side of the face. I was in

24 the bed asleep and all of a sudden, pow.

25 That's the first time I was really hit because

- 1 I'm faster than he is.
- 2 Q: Now, when you got hit, were you asleep when you
- 3 got hit?
- 4 A: I was.
- 5 Q: Do you know what he was doing -- do you know if
- 6 he was asleep?
- 7 A: I don't know.
- 8 Q: Did your former husband ever suffer from
- 9 anything like sleep apnea or have sleepwalking
- 10 fits or anything like that?
- 11 A: He snored.
- 12 Q: All right. Anything other than that?
- 13 A: I don't know.
- 14 Q: When he hit you when you were sleeping, were
- 15 you all in the same bed at that time?
- 16 A: Yes.
- 17 Q: Did that happen on more than one occasion?
- 18 A: Not in the bed.
- 19 Q: Did you ever get any bruising or anything else?
- 20 A: I did from that one.
- 21 Q: Did you seek any hospital treatment?
- 22 A: No.
- 23 Q: Have you ever called DSS?
- 24 A: No.
- 25 Q: Have you ever called Social Security?

1 A: No.

2 Q: Have you -- did you ever --

3 A: Social Security, I had -- I called Social

4 Security when he died.

5 Q: Yeah.

6 A: And they were not aware of it, by the way.

7 Q: What, that he died?

8 A: Uh-huh (affirmative response).

9 Q: That is not surprising.

10 A: I was surprised. But let me see, have I ever

11 called them other than that --

12 Q: And I was thinking more of like Social Security

13 disability making a claim for abuse or anything

14 like that?

15 A: Oh, no. Never.

16 Q: Okay.

17 A: I never had a claim, that I know of.

18 Q: When you called the police, did you fill out

19 any actual police reports?

20 A: Oh, yeah.

21 Q: Okay. When you did that, did you actually go

22 down to the police department and fill it out?

23 A: I did.

24 Q: Do you remember when you did that?

25 A: Well, shortly after, like the night -- next

1 day, if I could. The next day or next two
2 days.

3 Q: Which police department was that?

4 A: It was the sheriff's department.

5 Q: In Orangeburg?

6 A: In Orangeburg.

7 Q: What, if any, follow up did they have?

8 A: What do you mean follow up?

9 Q: Well, I mean, what did the police officers do
10 after they took the report?

11 A: Nothing. You mean at the scene?

12 Q: Yeah. Well, when you filled out the police
13 report, did they do any follow up?

14 A: Well, first of all, I don't know what you mean
15 by follow up, but I never saw them or heard
16 from them again.

17 Q: Okay. Well, I think that probably answers my
18 question. What I'm asking you is you went down
19 to the police department and filled out a
20 police report on your husband, is what you
21 testified to?

22 A: Yeah.

23 Q: Okay. After you did that, did they ever do
24 anything?

25 A: No.

- 1 Q: Did they ever arrest him?
- 2 A: No.
- 3 Q: Did they ever detain him?
- 4 A: No.
- 5 Q: Talk to him or anything like that?
- 6 A: No. There were occasions that they would say,
- 7 well, he -- there was an occasion they told him
- 8 to leave the house and not come back that
- 9 night. There were other occasions when they
- 10 said, we'll be sitting down the street if you
- 11 need us. Other than that, no.
- 12 Q: The occasion that they asked him to leave for
- 13 the night, do you remember when that was?
- 14 A: The first one. The first one.
- 15 Q: And is the first one the one where you woke up
- 16 and he hit you in the side of the face?
- 17 A: I didn't call them for that.
- 18 Q: Okay. So what was the first incident that you
- 19 called them?
- 20 A: The first incident I was -- I was losing all my
- 21 records, all my papers and records and mail.
- 22 Anything -- anything he could get his hands on
- 23 was going to the dump that night, he said.
- 24 Q: When did you move into your own room?
- 25 A: I don't know exactly.

1 Q: And did you have a lock on your door?

2 A: Yes. I put one on myself.

3 Q: Did anybody else have that key?

4 A: There was no key. It was one of those -- I was

5 locked in, but I couldn't lock it from the

6 outside.

7 Q: Okay. So you had a deadbolt that only worked

8 on the inside?

9 A: Yeah.

10 Q: Okay. Did your husband ever try to force his

11 way into your room?

12 A: Yes.

13 Q: What was he doing when he did that?

14 A: Ranting and raving and he -- he forcibly broke

15 the knob one -- one time he forcibly broke it.

16 Q: You testified earlier that he drank?

17 A: Yes.

18 Q: Do you know how many beers he would usually

19 drink?

20 A: He put alcohol in beer cans. I had to clean

21 them up. I know.

22 Q: Did he have anybody else there or was he just

23 alone?

24 A: Alone. With me.

25 Q: Who else is a witness to his drinking?

1 A: Well, anybody that was around the house, but
2 that was basically nobody. My son and
3 daughter-in-law were there occasionally, but I
4 don't -- he watched himself when they were
5 around. He never overdid around them.

6 Q: So you can't think of anybody that would be
7 able to testify as to the amount of alcohol he
8 drank when he was alone?

9 A: No. I can't, but the police came to the house
10 one night that he called and found him so drunk
11 on the sofa he couldn't even speak, and he
12 called them.

13 Q: Do you know why he called them?

14 A: I was not there.

15 Q: Oh, that was the night that you left and then
16 he called and said that --

17 A: No, there's been a couple of those nights.

18 Q: Okay.

19 A: That was not the one.

20 Q: Okay.

21 A: Not the one we were discussing earlier.

22 Q: Oh, so that was a different incident that you
23 testified about earlier that you left and
24 waited for him to pass out?

25 A: Well, I left a lot and waited for him to pass

1 out, and he didn't usually call the police.

2 Q: Okay.

3 A: But he -- he did that time.

4 Q: Did he ever fill out any police reports?

5 A: I don't know. Let me think. Oh, he called
6 them another time. He was loading up his car
7 from the garage, and all of a sudden, he said
8 something's missing out of my car, van, you
9 know, and he couldn't find it, and so he called
10 the police. They came, looked around, saw
11 nothing, left.

12 Q: Do you know what he was looking for?

13 A: Some things that had been taken out of his van
14 while it was opened while he was loading up
15 other things. I don't know what it was.

16 Q: This time period when the police were being
17 called out for domestic disturbances, we'll
18 just call it that, was this before or after
19 your incarceration?

20 A: Oh, it was before.

21 Q: What time period before? Can you give me like
22 a band of, you know, approximately this to this
23 month?

24 A: No, I can't. No, I can't.

25 Q: Was it more than a year before June of 2005?

1 A: I would say it was more than -- I don't believe
2 that the police were called -- it was not more
3 than a year, I don't believe.
4 Q: You think it was before or after January that
5 all this was happening?
6 A: Somewhat right before and after, is what I
7 think.
8 Q: You testified earlier that you went and did you
9 actually go to Sistercare and talk to them?
10 A: I did.
11 Q: You don't remember who you spoke to?
12 A: Dr. Ross.
13 Q: Dr. Ross?
14 A: Ross.
15 Q: Okay.
16 A: And I disclosed that.
17 Q: Okay. And did they have a place that they were
18 going to set up and let you go to, but the only
19 reason you didn't go was because you wanted to
20 stay with your cat?
21 A: She said that this was -- the option that she
22 had to offer me was the fact that she could
23 provide me a place where I would disappear,
24 have a job, and a place to live. And I didn't
25 take her up on it because of the cat initially,

1 but I knew I could think about it. So that may
2 have been the way we left it, that I would think
3 about it. And she said how can I keep track of
4 you. I said, you can't. I will have to
5 contact you. That's the way we left it.

6 Q: And I don't recall if you've said it before, do
7 you remember when you actually contacted them?

8 A: No. But I'm sure she has the record.

9 Q: Was that before or after your commitment?

10 A: That was after because I was on medicine. I
11 was struggling to sit in a chair at that
12 particular time.

13 Q: So that was within that one-year time period
14 when you got discharged?

15 A: It was -- that was.

16 Q: Okay. Did you ever speak to anybody else about
17 your visit to Sistercare?

18 A: No. Possibly Joan Graves because we talked
19 regularly, and she may have even found her for
20 me.

21 Q: Okay.

22 A: And she was in Texas.

23 Q: And Joan is now in Myrtle Beach?

24 A: Joan is deceased.

25 Q: Deceased. That's right. Okay. There's a lot

1 of names I've got to keep track of here, so.
2 Did you ever speak to a priest or a pastor or
3 anyone like that in the clergy about abuse
4 issues you had with your husband?

5 A: No.

6 Q: In your prior deposition you testified that
7 your former husband controlled the police and
8 everyone else in Orangeburg?

9 A: That's what he said. That's what --

10 Q: Okay. That's what he told you?

11 A: That's what he told me.

12 Q: Do you have any specifics as to whatever
13 control he had over the police?

14 A: I do not.

15 Q: So other than him telling that he could control
16 them, do you have any evidence that he actually
17 had that?

18 A: No.

19 Q: When did you receive your training from the
20 FBI?

21 A: At the time I got my concealed weapon's permit.

22 Q: All right. How did you get trained by the FBI?

23 A: Well, they gave a class to get the concealed --
24 I'm not sure that the FBI offered the class.
25 You go through a class with a trained policeman

1 or whoever, and I did in Orangeburg. And then
2 you have to be cleared by the FBI. They do a
3 thorough background check on you and you have
4 to be cleared.

5 Q: When did you get your weapon's permit?

6 A: Well, I've had it a while. I would have to
7 look that up, but I've had it probably close,
8 not quite eight years, but probably close.

9 Q: When did you see the witches and warlocks?

10 A: Never.

11 Q: Why would -- why do some of the records say
12 that you had been seeing witches and warlocks?

13 A: I don't know.

14 Q: Where did that come from?

15 A: I don't know.

16 Q: What about your house; was it ever bugged?

17 A: Lewis said it was.

18 Q: All right. Did he ever say that in front of
19 anybody else?

20 A: No.

21 Q: All right. Why would he say it was bugged?

22 A: He came home with pieces of information. I had
23 had a conversation with my sister, and he came
24 home with pieces of information on that
25 telephone call. And I questioned him about

1 that thinking whatever, I wondered how it
2 happened. He said the house is bugged. He
3 said the phone is bugged and the house is
4 bugged. Of course, this was cell phone by
5 then. He said it was bugged.

6 Q: Did your former husband get along with your
7 brother and sister?

8 A: Yeah.

9 Q: In fact, I mean, your brother was a pallbearer
10 at your husband's funeral, right?

11 A: I don't know anything about that.

12 Q: Tell me about your former husband's second
13 family.

14 A: Oh, I was eating in Ryan's in Orangeburg,
15 normal, by myself, and the women at the next
16 table were talking about this person. He was
17 on the news. I don't know who it was, having
18 a second family, maybe not on the news, but
19 they were talking about somebody else that had
20 a second family. And then one of the women
21 says, I hear that that Argoe fellow at the
22 screen company has a second family. Well, she
23 didn't know me and I didn't know them. So I'm
24 listening and the other one said, yeah, they
25 had heard that too, and this other girl didn't

1 hear it of course, and they were telling her
2 that there was a second family, that he had a
3 mistress. So I'm listening. Well, I come home
4 and I tell him. I said you will never guess
5 what I heard at lunch today. Well, boy did
6 that start a war.

7 Q: When was that?

8 A: I don't know. That was -- I don't know when it
9 was. I don't know when it was. I guess I
10 should have written things down, but I'm not a
11 person that writes a log. I just -- not in my
12 nature, never has been. I don't know and the
13 -- that was a major ranting and raving for
14 hours and hours and hours, and who were the
15 women and who would dare say anything like that
16 about him, and am I going to believe everything
17 that I hear and I'm gullible and stupid to be
18 listening. I couldn't miss it.

19 Q: So that was just gossip you overheard some
20 people talking about it. Do you have any
21 corroboration as to whether or not that was
22 true?

23 A: No.

24 Q: After that incident when you got home, was that
25 one of the incidents where your husband was

1 physically abusive?

2 A: I don't remember any specific. You took what
3 came at the time, you know.

4 Q: Is Orangeburg a safe place to go out late at
5 night?

6 A: It's probably not the best.

7 **MR. DODSON:** Object to the form.

8 Q: Do you think it's reasonable that your husband
9 and son were concerned if you were out by
10 yourself late at night in Orangeburg?

11 A: I don't know.

12 Q: Were you at any other hearings with the probate
13 court other than the one that was at Three
14 Rivers?

15 A: No. Not that I recall, but really no.

16 Q: Dr. Mobley, you already testified, spoke with
17 you prior to it, and then at the hearing, she
18 said that she thought you needed to continue
19 treatment and medications, correct?

20 A: The exact words the judge said, do you think
21 she needs medication, she said, yes, I do.

22 Q: Did anyone at that hearing say that they
23 thought you did not need treatment and
24 medication?

25 A: No.

1 Q: Who else provided testimony at that hearing?

2 A: Ann Burrell said something. I don't remember

3 exactly what it was.

4 Q: Did your brother or sister talk?

5 A: No, they did not. I had the option to request

6 them talk or not talk. I didn't need to hear

7 from any of them ever again in my life.

8 Q: If they had spoken, do you know what they would

9 have said?

10 A: No.

11 Q: Had you spoken with your brother or sister as

12 to why you were in the facility?

13 A: No.

14 Q: Other than the judge and Nurse Burrell and Dr.

15 Mobley, did anyone else speak at that hearing?

16 A: The man from Orangeburg that was appointed five

17 minutes before to tell my side said whatever I

18 told him and he said -- no, he answered -- he

19 said something.

20 Q: You don't recall what he said?

21 A: The judge -- he said the charges, every one

22 could be explained away. And I had told him on

23 the outside, I explained every one on the way,

24 just like I'm telling you, and he said -- told

25 the judge every one could be explained away,

1 but, and then he stopped and that's all I
2 remember.

3 Q: Now, are you talking about the allegations of
4 abuse that you had raised with regard to your
5 former husband, that those are the charges that
6 could be explained away?

7 A: Everything that I was charged on on the
8 commitment paper that he had written down. I'm
9 not even sure what all was there, but I
10 explained everything on there to him.

11 Q: Okay. All right. So that I understand what
12 you're saying, with the original commitment
13 paperwork, your former husband filled out why
14 he had concerns and why he thought you needed
15 to be involuntarily committed, correct?

16 A: I don't know -- it had to be him. I don't
17 know.

18 Q: Okay. Did you ever actually see any of that
19 paperwork?

20 A: No.

21 Q: Have you seen any of that paperwork?

22 A: No. Maybe. No, I don't think so.

23 Q: So are you saying the person that was your
24 guardian helping you out at that hearing, was
25 he saying that all of those issues that are

1 raised in the commitment paperwork could be
2 explained in a reasonable manner, was what his
3 argument was?

4 A: That's what he said.

5 **MR. DODSON:** Object to the form.

6 Q: Okay. And the result of that hearing is that
7 the judge ordered continued involuntary
8 commitment followed by the one year of follow-
9 up outpatient treatment?

10 A: All I remember him sentencing me to is one
11 year. The gavel came down and he said one year
12 of medication.

13 Q: Okay.

14 A: I will never forget that.

15 Q: Did the judge say what type of medication?

16 A: No.

17 Q: Did he say who was going to be assigned to
18 administer that?

19 A: No. Well, he may have, but I don't remember
20 it.

21 Q: Okay. Did you speak at that hearing?

22 A: I don't think I could. I didn't, no. I don't
23 remember speaking.

24 Q: Did you have the opportunity to speak?

25 A: I don't remember that I did.

1 Q: But the gentleman who was your guardian spoke
2 on your behalf?

3 A: Yes, I do remember that.

4 Q: Do you believe that he accurately presented
5 your position?

6 A: He never saw me before two minutes before we
7 went in. He said maybe one sentence, and that
8 was it. Do I think that's enough? No.

9 Q: How long did the hearing take?

10 A: I'm not sure because they heard everybody else
11 first. I was last. And since I was so
12 drugged, I remember it was very hard for me to
13 sit up. I was struggling to sit, before I went
14 in and when I got in there. What that medicine
15 does, it -- you know you're sitting in the
16 chair. First of all, it's hard to hold your
17 head up. You're drooling at the mouth, and
18 your vision is somewhat there, but it's sort of
19 blurred. But then you're sitting in the chair
20 and you know in your brain you're sitting in
21 the chair, but you feel like you're sliding out
22 of that chair, but you know you're not. But
23 your body feels like it's just sliding out of
24 the chair, and it was very difficult for me to
25 sit before I went in and after I -- while I was

1 in there.

2 Q: Did you understand what was going on with the
3 proceedings while you were there?

4 A: That I was going to be drugged for a year, yes.
5 I understood that.

6 Q: Have you ever admitted that you needed help?

7 A: Never, and don't today. I never did. I do not
8 now and I should never have been held or
9 drugged. And if the doctors and nurses had
10 done their job as they were supposed to, I
11 would not have been.

12 Q: Let me ask you how, or what could the doctors
13 or nurses or whoever else you would include in
14 that statement, what could they have done?

15 A: They could have administered a psychological
16 test, which never was done on me ever until I
17 got to Atlanta to Dr. Davis. He tested me.
18 And I'm sure you have that report.

19 Q: Do you recall when you actually saw Dr. Davis?

20 A: Not specifically, but Jan and I -- Jan Warner
21 and I went together. And you have a record of
22 that.

23 Q: I don't recall the date off the top of my head
24 right now, but was that --

25 A: It was after drugs.

1 Q: Right. Do you know was that in 2006, 2007,
2 2008?

3 A: I think it was before divorce, so I would say
4 '06, but that's a guess. But I know it was
5 before divorce.

6 Q: Before you started the divorce proceedings?

7 A: Before -- no. No. No, before I actually got
8 it. That was a big day in my life.

9 Q: What type of testing did Dr. Davis actually
10 perform?

11 A: Questions on the computer, one-on-one questions
12 to me.

13 Q: Anything other than questions?

14 A: I had to fill out paperwork for him; I had to
15 fill out when I went in.

16 Q: What type of paperwork did you fill out?

17 A: I don't remember. I don't remember. I'm
18 assuming that it was on my medical history
19 because I remember that I couldn't spell
20 hysterectomy, and they sat me down in the
21 office with a dictionary.

22 Q: Okay. With this testing that you did with Dr.
23 Davis, how were those results sort of gathered
24 or tabulated? Were you given a report or
25 anything like that?

1 A: It came back in an affidavit by Davis.

2 Q: Okay. I've seen the affidavit that Davis had.

3 A: Okay.

4 Q: Is that -- are you saying that's basically his

5 report?

6 A: Well, I would say so.

7 Q: Okay. Have you seen anything else from him

8 that would be like a report?

9 A: No. I've seen no paperwork from him.

10 Q: Do you know what any of the original paperwork

11 that you filled out, what the status of any of

12 that is?

13 A: No.

14 Q: After you did your testing at your visit down

15 with Dr. Davis in Atlanta, did you have any

16 follow up with him where he described what he

17 saw?

18 A: No. No, I did not. It was not necessary. He

19 said it wasn't.

20 Q: Okay. What is your understanding of what his

21 conclusions were?

22 A: My understanding is that he found nothing

23 wrong. I got 100 percent on the test, and if

24 they tried to get me back in Three Rivers

25 again, he would personally fly to Columbia and

1 testify. Now, that's what he told my attorney,
2 Jan Warner.

3 Q: Did you pay Dr. Davis for your time with him?

4 A: I didn't personally. It came out of the Warner
5 Law Firm.

6 Q: So whatever fee you were paying to him, they
7 paid Dr. Davis?

8 A: I gave Jan what money I had --

9 **MR. DODSON:** Let me stop you.

10 A: Okay.

11 **MR. DODSON:** Don't talk about anything you gave to
12 Jan or money-wise or anything else.

13 A: Okay. All right. I'm sorry.

14 **MR. DODSON:** That's all right.

15 A: Okay.

16 Q: You testified earlier this morning that you had
17 an account with a broker and that broker is one
18 of the people that you sued in the first
19 iteration of this lawsuit, correct?

20 A: (Nods head affirmatively.)

21 Q: After you hired your first attorney, you
22 basically canceled that contract with the
23 broker, correct?

24 A: Yes. We dropped the suit, if that's what
25 you're asking.

1 Q: Well, I know you dropped the suit, but you
2 withdrew your money from that account?

3 A: Oh, certainly.

4 Q: Okay. Did you then create another brokerage
5 account to manage those funds for you?

6 A: No.

7 Q: What did you do with all those funds that you
8 withdrew?

9 A: It went for attorney's fees.

10 Q: Do you know how much you have paid in
11 attorney's fees?

12 A: Not exactly.

13 **MR. DODSON:** Don't answer that question.

14 A: Well, I don't know exactly.

15 Q: I think if you know how much you paid in
16 attorney's fees, you need to tell us that.
17 That's not a privileged --

18 **MR. DODSON:** Don't answer that question. Don't
19 answer that question.

20 **MR. COLE:** That's not a privileged question.

21 **MR. DODSON:** Well, you can --

22 **MR. COLE:** So let me --

23 **MR. DODSON:** -- make that argument, but I'm
24 directing her not to answer the question, so
25 move on.

- 1 **MR. COLE:** Let me ask her this question first.
- 2 **Q:** Do you know, and don't give me the number, but
- 3 do you know how much you have paid in
- 4 attorney's fees?
- 5 **A:** No.
- 6 **Q:** Okay. When you and your husband were together,
- 7 were you on his insurance?
- 8 **A:** Yes.
- 9 **Q:** Okay. When you were at Aurora and Three
- 10 Rivers, were you under his insurance policy?
- 11 **A:** Yes.
- 12 **Q:** Have you paid any money to Aurora or Three
- 13 Rivers?
- 14 **A:** I don't know.
- 15 **Q:** As far as you know, you haven't paid any of the
- 16 medical bills for any of the involuntary
- 17 commitment?
- 18 **A:** I personally never signed anything.
- 19 **Q:** Other than attorney's fees that you may have
- 20 paid, are you out of pocket any money because
- 21 of the involuntary commitment?
- 22 **A:** I'll have to think about that. I don't know.
- 23 I can't come -- let's just say I don't know on
- 24 that one.
- 25 **Q:** Okay. The properties that were put into trust

1 that were involved in the first appeal that you
2 dealt with with the attorney for Buss and your
3 former husband, all of those properties have
4 been transferred back to you, correct?

5 A: As far as I know, yes.

6 Q: You don't know the name of the little girl --

7 A: No.

8 Q: -- not little girl, but the girl at the desk?

9 A: When you're breathing, can't walk, stand up,
10 and you need help, you don't ask what their
11 names are.

12 Q: Have you ever had that same experience of
13 difficulty breathing before or after?

14 A: Never. Never. Had it not been for my mother's
15 breathing exercises, I wouldn't have known what
16 to do.

17 Q: And do you attribute the breathing problems to
18 that particular medication?

19 A: Yes.

20 Q: And when they stopped or I guess when they did
21 not administer that same medication again, you
22 didn't have that reaction?

23 A: I didn't have the breathing problem.

24 MR. COLE: I'm notorious for just plowing through
25 things. Why don't we take a quick break

1 because, if not, then I'm not going to stop for
2 a little while. So let's take a short break
3 real quick.

4 (Break from 3:10 p.m. until 3:23 p.m.)

5 (Defendant's Exhibit Numbers One through Eight were
6 marked for identification purposes during the
7 break.)

8 BY MR. COLE:

9 Q: Are you claiming as any damages in this case
10 paying any of your attorney's fees?

11 A: That's up to my legal counsel.

12 Q: All right. So sitting here today, you can't
13 say whether or not you are or not including
14 that as your damages in this case?

15 A: That's right.

16 Q: From myriad different sources I have multiple
17 copies and different places of documents that
18 have been produced in this case.

19 A: Okay.

20 Q: And this case dates back a pretty long time
21 because, you know, it goes before the appeals,
22 and I'm still trying to sort through that, but
23 I do have some documents that I want to refer
24 with you and ask you questions about. Some of
25 them will be pretty quick; some will be more in

1 depth. Every document that I give you I'm
2 going to give you every ample opportunity for
3 you to review it as long as you need before I
4 ask any questions on it, okay? I have copies
5 -- mostly I think I have copies enough for
6 everybody if anybody wants to see them. And so
7 the first one, which we have marked as Exhibit
8 Number One to your deposition, do you recognize
9 that document?

10 A: I see I signed.

11 Q: And you can just tell me when you're ready to
12 move on.

13 A: Okay. The way I understand it, this is a power
14 of attorney made by Lewis Lanier; is that
15 correct?

16 Q: You mean the --

17 A: Attorney.

18 Q: -- attorney who helped out to draft it?

19 A: Yeah.

20 Q: Okay. Is this your power of attorney that was
21 given on April 20, 2004, to your son?

22 A: 2004.

23 Q: If you look on the top of the second page. See
24 above your signature?

25 A: Yeah. Well, I made a power of attorney with

1 Lewis Lanier. Naturally, I don't remember the
2 date, but that's what it says.

3 Q: Okay. But the date is April 20, 2004, correct?

4 A: Well, that's what the paper says, yeah.

5 Q: Okay.

6 A: And I don't -- I can't argue with that one way
7 or the other.

8 Q: Is that your signature?

9 A: It looks like it, yes.

10 Q: Okay. Is this the power of attorney that your
11 son used later to try to set up the trust?

12 A: I don't know what he used.

13 Q: Okay.

14 A: I have no idea.

15 Q: In April of 2004, why did you issue a power of
16 attorney?

17 A: I had a will and it was too complicated for the
18 normal person to understand. So I wanted a
19 clear will, one that everybody could read and
20 understand what it said and that there would
21 be no arguments about. So I redid my will with
22 Lewis Lanier in Orangeburg, who is my neighbor,
23 and the power of attorney also.

24 Q: What is your understanding of what the power of
25 attorney does?

1 A: In case of me being totally disabled, that he
2 would act in my behalf for my care and benefit
3 only for me.

4 Q: Okay.

5 A: Not himself.

6 Q: Now, this was actually filed with the clerk's
7 office April 27, 2004, if you look at the stamp
8 on that first page. You see here where it's
9 got a stamp?

10 A: Yeah. It took them seven days.

11 Q: But this was actually filed with the court?

12 A: Yeah.

13 Q: Do you know what that means when it's filed
14 with the court?

15 A: I thought they all were.

16 **MR. DODSON:** Object to the form.

17 Q: Why did you give it to your son rather than
18 your husband?

19 A: Because I did not trust my husband.

20 Q: What, at that time in April of 2004, made it so
21 you did not trust your husband?

22 A: Well, the abuse had started. I didn't trust
23 him. I didn't believe he had my best interests
24 at heart.

25 Q: And why not? Why do you think he didn't have

1 your best interests at heart?

2 A: He was never any help. I never --

3 Q: Can you give me specifics, like if he gambled?

4 A: He lived his life, I lived mine, and then he
5 yelled and screamed and hollered at me.

6 Q: Did he try to do something to assist you with
7 your life, and if he did, what examples can you
8 give me about that?

9 A: I can't.

10 Q: So you all just lived basically separate lives?

11 A: Basically. I mean, he went his way, I went
12 mine.

13 Q: When you were doing your things, were you
14 hanging out with friends?

15 A: Just at lunch. Just when I ate lunch. And
16 during this time, I was building in Beaufort
17 and I -- that takes a lot of planning. It
18 takes a lot of back and forth on the road.

19 Q: So this was when you were building your house
20 in Beaufort?

21 A: (Nods head affirmatively.)

22 Q: Were you traveling to Beaufort like every day?

23 A: I wouldn't say every day, but yes, I was
24 traveling to Beaufort.

25 Q: And what were you doing when you were going

1 down to Beaufort?

2 A: Picking out things, talking with subs and
3 contractors and overseeing the project,
4 enjoying it. I like building. Yes, eating
5 out, went to lunch with my contractor and
6 whoever else. It was at the marina and whoever
7 else was in -- whoever else had come into the
8 marina on a boat that was friends with us, you
9 know, the transient, whoever -- whoever was
10 there.

11 Q: Are you saying that you had friends that you
12 knew before that came down there, or was that
13 people that came off the boat and you just had
14 --

15 A: No. That was -- that was Beaufort friends.

16 Q: Okay. So they --

17 A: And mostly friends of my contractors. We just
18 whoever -- whoever wanted to go eat with us
19 did.

20 Q: Other than the time that you were building your
21 house down in Beaufort, what was your typical
22 day around this time period?

23 A: Get up about 11, have coffee, do whatever I had
24 to do in the business world, open mail,
25 whatever, go eat at lunch, visit with friends

1 at lunch. We'd eat leisurely, and then I would
2 do whatever shopping I had to do, whether it be
3 groceries or whatever. And I had to be home by
4 five o'clock because he insisted that I was
5 there when he got back. Now, he may not get
6 back until eight, but I had better be there at
7 five in case he did, and I complied. I don't
8 like -- I don't like a raging fit if I can
9 avoid it.

10 Q: So what would happen if you weren't there when
11 he got home?

12 A: Pretty much what happened when I did get --
13 when he did get there. It was just required
14 that I be there. And he wanted someone to sit
15 right there with him while he watched
16 television. Of course, he owned the flipper,
17 he chose the station, and I was not to get up
18 and do anything, I was to sit right there with
19 him. So therefore, if there was anything I had
20 to do around the house, it had to be done at a
21 different time.

22 Q: All right. How did he make it so that you were
23 not able to do anything other than sit there
24 with him to watch TV?

25 A: Come in here and sit down beside me and watch

1 this. Now, when he got -- when he passed out
2 or went to sleep or whatever, I would get up
3 and do things, and he'd wake up and come get
4 me, "I told you to sit right here."

5 Q: Did he physically hold you down or do anything
6 like that?

7 A: No, he didn't physically. He made it very
8 unpleasant.

9 Q: When you were out doing your thing during the
10 day, what did he do -- what did he do during
11 the day?

12 A: Supposedly at work.

13 Q: Now, you say supposedly?

14 A: I don't know where he was. He was working.

15 Q: Did you ever go and visit him at work?

16 A: Very seldom. Very seldom. Almost never.

17 Q: What did his business actually do?

18 A: It manufactures screen doors and louver blinds.
19 It's a wood business. Wood manufacturing.

20 Q: Did you ever officially revoke this durable
21 power of attorney?

22 A: When I got to Jan, I don't know what he did.
23 I don't know what we did at that point in time.

24 Q: Did you ever have anybody other than your son
25 that you considered that might have your

1 durable power of attorney?

2 A: No.

3 Q: Not your brother or your sister?

4 A: No.

5 Q: Okay. I got the wrong copy, so --

6 (Off the Record Discussion.)

7 Q: All right. Let the record reflect that I had
8 marked what I thought was your Answers to
9 Interrogatories so that we could go over them,
10 but I accidentally marked the Supplemental
11 Aanswers to Interrogatories.

12 A: Explain supplemental.

13 Q: It just means adding to what you had before.

14 A: Okay.

15 Q: And what I'm going to do is we'll just
16 withdraw. We won't have an Exhibit Number Two.
17 It'll be easier since we've already numbered
18 the other ones. Let me just ask you a general
19 question. These are interrogatories. Do you
20 know what interrogatories are?

21 A: Not exactly, no.

22 Q: Okay. Interrogatories are basically just
23 questions that attorneys ask the other
24 attorneys about, and then we get input from the
25 clients to make responses to them. And so

1 these are questions asking about facts and
2 other issues with the case. Have you ever seen
3 those documents before?
4 A: Seen those documents before. Let's see.
5 Q: And then supplement to that question, did you
6 ever review those documents for accuracy?
7 A: It's been a long time.
8 Q: And just for the record, you're reviewing
9 plaintiff's answers to the interrogatories that
10 were propounded by my client Three Rivers and
11 Nurse Burrell. But you recall seeing those at
12 some point, or something close to it?
13 A: Yeah. This is -- yeah. Yeah.
14 Q: All right. So you've seen that before?
15 A: Yes. It just takes me a while to remember.
16 Q: Right. And you've reviewed that before?
17 A: Yes.
18 Q: Okay.
19 A: Let's see. What else did you give me? Oh.
20 Q: The supplemental one.
21 A: That means added to?
22 Q: Right. That just means something that wasn't
23 on the original, so they're adding to it.
24 A: Oh, gracious. Okay. This was prepared by --
25 Okay. Okay. I got that. All right.

1 Q: So you recognize those?

2 A: Yeah.

3 Q: Let me ask you one specific question about the

4 answers when it's identifying potential

5 witnesses and when your brother and sister are

6 identified, there's a reference in those

7 paragraphs saying that there are affidavits

8 that they both executed. First, do you know

9 what an affidavit is?

10 A: Yes. It's an affidavit stating that this is

11 what I will testify to.

12 Q: Okay. Do you recall ever seeing any affidavits

13 that your brother or sister submitted?

14 A: I may have, but I don't recall.

15 Q: Do you recall, if you had seen them, what at

16 all any of the content is?

17 A: I don't recall.

18 Q: Do you recall in what context you may have seen

19 that? Like was it attached to some other

20 document or anything like that?

21 A: No. I don't remember that.

22 Q: All right. Since we skipped Exhibit Two, I'm

23 now going to hand you Exhibit Three. You can

24 give me that other stuff back and get it out of

25 the way. You can keep that one.

1 A: How come that stays and that goes back?

2 Q: That one's marked, these aren't. So we're just
3 referencing these, so that one, that's --

4 **MS. GANES:** She'll chase us down, if we leave with
5 that one.

6 **COURT REPORTER:** That's mine.

7 A: Okay. Got it.

8 Q: All right. What has been marked as Exhibit
9 Three, this came out of the file materials,
10 although I could not tell you where.

11 A: Okay.

12 Q: And actually, my question to you first is have
13 you ever seen this before, which appears to be
14 actually two documents, the first one is dated
15 April 27, 2005, and the second one, which is
16 the latter two pages, it looks to be undated.
17 Have you ever seen these before?

18 A: I don't know.

19 Q: And again, take as much time as you need to
20 read it.

21 A: Are you allowed to tell me who wrote this or am
22 I supposed to figure that out?

23 Q: Well, you're not supposed to ask me any
24 questions, but --

25 A: Okay.

1 Q: -- but if I knew who wrote it, I would tell you
2 and I don't, so.

3 A: Well, what am I supposed to say?

4 Q: Well, I'm asking you if you've seen it. My
5 next question was going to be do you know who
6 wrote it or who offered, gave the information
7 that got into these documents?

8 A: Well, sleeps in her room with the door locked,
9 who would know that but my ex-husband?
10 Religious programs, when he would pass out or
11 fall asleep in the chair, I'd go in the other
12 room and watch my TV set, he'd wake up and go
13 get me, who would know that but him?

14 Q: Is there anyone else that would be able to
15 offer testimony about those particular habits?

16 A: Well, my friend Joan Graves could if she were
17 alive.

18 Q: Now, did she actually ever witness any of that,
19 or is that just what you told her?

20 A: No. She heard Lewis. I didn't know he was in
21 the house and I was talking to her on the cell
22 phone, and she heard him grab my phone away
23 from me and scream. She also heard running up
24 and down the stairs with whatever it was on the
25 wall when I was in my bedroom. But she's not

1 here.

2 Q: Uh-huh (affirmative response).

3 A: She's the only other one.

4 Q: We don't know who drafted these documents, but

5 it looks like the information that got into

6 these came from your ex-husband.

7 A: I don't see how anybody else could have -- I

8 mean, how does -- who would know what I watch?

9 Q: Okay. Let me hand you next Exhibit Four.

10 First, have you ever seen this letter before?

11 A: I've got to read it first.

12 Q: Go ahead. Take as much time as you need to

13 read it, but that's going to be my first

14 question.

15 A: I don't think so. I never saw anything from

16 Walsh.

17 Q: Okay.

18 A: That I recall. That I recall.

19 Q: Who is James Jackson, Jr.?

20 A: I don't know. I don't know. James Jackson,

21 Jr.? That's a good question.

22 Q: He's copied on this letter.

23 A: I don't know who that is.

24 Q: Do you know why he would be copied on this

25 letter that was sent from Mr. Walsh to the

1 probate court and copied to James Jackson, Jr.
2 and Lewis Argoe?

3 A: No, I don't even know who he is.

4 Q: This letter is talking about proceedings where
5 they're attempting to set up a conservatorship
6 for you in the latter part of 2005.

7 A: Okay.

8 Q: And this letter says that, "To the surprise of
9 all parties involved, medication and counseling
10 has resulted in a complete turn about of Ms.
11 Argoe's mental state." And then they say we
12 don't need to have the hearing at this point.
13 Is that how you read this letter?

14 A: That's how I read it. But Ms. Argoe couldn't
15 move from the medication. She couldn't fight
16 for her life, and she didn't know anything
17 about this.

18 Q: Do you believe that you were ever in danger of
19 actually dying?

20 A: Oh, yes.

21 Q: Why?

22 A: At what point in time are you talking about?

23 Q: Well, you've made some comments about fighting
24 for your life and things like that.

25 A: Absolutely.

1 Q: And I'm asking you the question, when did you
2 have those times that you were fighting for
3 your life and why did you believe you were
4 having to fight for your life?

5 A: Well, the first on the medication that I
6 remember is in Three Rivers when I couldn't
7 breathe. That I felt was life threatening.
8 And then the effects of the medicine were so
9 debilitating, and I was in the house with my
10 ex-husband hardly able to defend myself. Up to
11 this point I couldn't -- I was faster than he
12 was. I could run from him. And I knew that I
13 was pretty much at his mercy. I had absolutely
14 no defense, other than just being quiet, just
15 not saying anything. And that's pretty much
16 what I did. Plus as I stated before, the only
17 relief I had was really laying down. That's
18 the only position I could find where the
19 effects of the medicine were not tremendous.
20 And that was one -- that was one time. Plus
21 his threats.

22 Q: Excuse me, his what?

23 A: His threats.

24 Q: Threat, okay.

25 A: I felt at times that if he could have gotten

1 his hands on me, it was life threatening.
2 That's a lot -- that's the reason I left the
3 house. I never really drove off until it got
4 to the point where I felt life -- it felt life
5 threatening. After the medicine, I had to keep
6 my mouth shut because I knew I had no defense.
7 None.

8 Q: What do you mean no defense?

9 A: I couldn't get away from him. The medicine is
10 debilitating; it's hard to move. I'm not
11 quick. I'm not fast. I can't run. I can't
12 get -- I could get in the car and drive off,
13 but probably not quicker than he could get to
14 me.

15 Q: You testified this morning that when the
16 officer that first picked you up and
17 transported you to the hospital at the
18 beginning of the involuntary commitment, that
19 you asked him to stay with you and he stayed
20 with you --

21 A: He did.

22 Q: -- at least in the hallway in sight of you.

23 A: Yes.

24 Q: Did you ever ask, after that time period at any
25 point, for any protection from anybody when you

1 were either in the facility or when you got
2 discharged from the facility?

3 A: Well, I thought as long as he was with me I was
4 protected.

5 Q: All right. And --

6 A: That's why I asked him to stay with me.

7 Q: Right. And that's why I asked that is that I
8 understood that's the reason you wanted him to
9 stay with you.

10 A: Yes.

11 Q: And my question is after --

12 A: Plus I wasn't going to ride with my ex-husband.

13 Q: Okay. After that experience with that officer
14 the first time, at any point from that point
15 until today have you ever asked for police
16 protection or protection of some other source
17 because you felt endangered?

18 A: I didn't. I did wonder who could I -- who
19 could I -- who would do this. I did wonder
20 that. And then eventually I just ended up at
21 Sistercare. I knew they, I knew there was help
22 there. I didn't see a lot of relief from the
23 police. And who else was there?

24 Q: But your ex-husband never came at you with a
25 gun, did he?

1 A: No. I never saw --

2 Q: Or a weapon of any kind?

3 A: No, I never saw a weapon.

4 Q: And you've described one incident when you were

5 sleeping when he hit you in the face. Were

6 there any other times where he actually

7 physically hit you?

8 A: Kicked me. Does that count?

9 Q: Yeah. When did he do that?

10 A: In the den. He knocked me off my feet, kicked

11 me, and tried to get his hands on my cell

12 phone.

13 Q: Okay. When was that?

14 A: During that period of time. I can't tell you

15 exactly when. But I fought back that time. He

16 had me pinned down and I fought.

17 Q: Was that before the involuntary commitment or

18 after?

19 A: Before.

20 Q: Okay. After -- well, before I go on to that.

21 Do you recall what was the reason that he

22 wanted to get your cell phone?

23 A: I was talking to my friend in Texas.

24 Q: Now, this friend in Texas, what does she do for

25 a living?

1 A: She's -- well, she's deceased. You say does
2 she do, she's deceased. She was on disability.
3 She was in a wheelchair, and she looked after
4 a handicapped daughter, and they got government
5 assistance, both she and the daughter.

6 Q: What did you all talk about?

7 A: What was going on in my life. There was
8 nothing else to talk about. She was losing her
9 house. Eventually, at the end, we talked about
10 that. They were flooding the area. Basically,
11 they had taken her property and she had no
12 money or means to fight with an attorney and it
13 was one of those general everybody in the
14 neighborhood things. So I don't understand.
15 But anyway --

16 Q: So she was losing her house because the --

17 A: They were flooding --

18 Q: -- government took it?

19 A: They were flooding the area.

20 Q: Not because she had financial problems?

21 A: Well, I'm sure she had them but not the -- that
22 was not why.

23 Q: Did you ever give her any money?

24 A: Give her any money? She was losing her car for
25 default, and I may have sent her some then, but

1 I don't remember how much. But other than
2 that, I don't -- don't recall.

3 Q: Did she ever offer to be an advocate for you as
4 like a guardian or something like that?

5 A: Oh, no.

6 Q: Do you know if she ever called the police or
7 any other organization on your behalf?

8 A: I don't know, but I don't think so.

9 Q: Did you ever ask her to?

10 A: No.

11 Q: Let me show you what's marked as Exhibit Number
12 Five. The first question is, do you recognize
13 this?

14 A: Well, the actual sheet of paper I do not. But
15 I did talk with Joan and these appear to be the
16 calls. Did I ever see this piece of paper?
17 Probably not.

18 Q: Okay. And this is a Verizon bill, at least
19 pages five through eight of eight pages with a
20 bill date of June 19, 2005.

21 A: May I call to your attention that this is no
22 bill because she had Verizon and I had Verizon
23 and we talked free.

24 Q: Okay.

25 A: This is just a statement.

1 Q: So it's a statement of the calls that were made
2 during this time period?

3 A: Yes.

4 Q: Although you didn't have to pay for them
5 because Verizon let you talk to somebody that
6 was on Verizon free?

7 A: That's correct.

8 Q: Okay.

9 A: It would never have been this much had it not
10 been free.

11 Q: Okay. This is in the file materials.

12 A: Okay.

13 Q: This is the only thing I have seen in the file
14 materials of a Verizon statement. Do you know
15 why it's in there?

16 A: Do I know why it's in there? No.

17 Q: The phone number to 903-714-8191 which is
18 Tyler, Texas, is that your friend that we've
19 been talking about?

20 A: It evidently is. I don't remember the number,
21 but there was nobody else in Tyler, Texas.
22 She's the only one.

23 Q: Whose number to Greenville down there was 864-
24 444-7487?

25 A: I don't see that.

1 **MR. DODSON:** What page are you on?

2 **Q:** The first one, the fifth sort of -- well, look

3 at line 24.

4 **A:** Twenty-four.

5 **MR. DODSON:** Can I point it out to her?

6 **MR. COLE:** Go ahead.

7 **A:** Not really. Why don't we call and see who it

8 is. I don't recall that.

9 **Q:** Are the phone calls on this, were these just

10 your phone, or did you have a plan that

11 combined with everybody?

12 **A:** I had another phone. I got my own phone

13 separate from the one that my husband

14 monitored, the one that was in his name. I got

15 a separate one so that I could talk to my

16 friend in Texas because he would not allow

17 this.

18 **Q:** Is this what this account is?

19 **A:** This is it. This is it.

20 **Q:** Okay. On the second page at line 88 and 89, do

21 you know whose phone numbers those are in

22 Columbia? 803-540-1157?

23 **A:** Lines what?

24 **Q:** Eight-eight and 89.

25 **A:** Let's see what date.

1 Q: Around June 2nd, 2005.

2 A: No idea. Again, why don't we call them and

3 see.

4 Q: We can.

5 A: Suits me.

6 Q: When you were at Three Rivers, did you have

7 phone privileges?

8 A: No.

9 Q: Why not?

10 A: Because the family requested I have none.

11 Q: Do you know why?

12 A: That's what they wanted.

13 Q: Was that ever explained to you why?

14 A: No. They honored the family's request; it was

15 no phone calls.

16 Q: If you had been able to call someone while you

17 were at Three Rivers, who would you have

18 called?

19 A: I probably would have called Joan and said, you

20 know, this is why I'm not calling you, I can't.

21 Because all of the sudden, bam, you know, you

22 know she's probably wondering what happened.

23 Aside from that, I don't know.

24 Q: Was there any time at Three Rivers where you

25 had phone privileges?

1 A: Never.

2 Q: Did you ever ask to make any phone calls when

3 you were there?

4 A: I asked to call my son once because I didn't

5 know that he was -- I thought he was on my

6 side. And it was dialed through the main phone

7 at the desk. It was a vague conversation. At

8 that point in time I realized that he was no

9 help, and not going to be any help.

10 Q: Did you realize that he was aware of your

11 involuntary commitment at that point, or had

12 been part of it?

13 A: I knew he was aware of it because he knew where

14 the call was coming from, and I figured that he

15 had to be linked somehow.

16 Q: Was this before or after he had visited you or

17 attempt to visit you?

18 A: This was, I'm guessing, but I think before.

19 Q: Okay.

20 A: Well, now, wait a minute. He -- no, no, no.

21 He visited -- no, no. He visited me in Aurora

22 and got my jewelry. And then we went to Three

23 Rivers and I still, at this point, did not

24 realize that he was not with me on my side.

25 But then after this phone call it became

1 apparent that he was doing nothing.

2 Q: After you were discharged from Three Rivers,
3 where did you get your next treatment for that
4 next year?

5 A: At Coastal Empire in Beaufort. That's the one
6 I couldn't remember the name of.

7 Q: All right. And was this facility a place that
8 -- scratch that. Who selected Coastal Empire
9 as the facility that you were going to use?

10 A: I was assigned to it. I don't know who
11 assigned me. I was assigned.

12 Q: This is actually two letters in Exhibit Number
13 Six. The second letter is actually the earlier
14 dated June 16th, 2006, says that they had been
15 treating you since July 2005. Is that
16 accurate?

17 A: Again, I don't know dates.

18 Q: Who was your treating doctor at Coastal Empire?

19 A: Dr. Reamy.

20 Q: Did you see anybody else there?

21 A: Well, Dr. Elmore, who is stated right here, I
22 saw him once.

23 Q: When did you see Dr. Elmore?

24 A: Well, again, I'm taking their word for when it
25 was. It was during the time that I was in

1 Beaufort drugged.

2 Q: Do you recall what, if anything, was said or
3 done when you were with Dr. Elmore?

4 A: No, he just talked to me.

5 Q: Did he perform any tests or do any tests?

6 A: No. But he just talked to me, and that was
7 about it.

8 Q: The first letter in Exhibit Number Six, which
9 is the one dated July 5, 2006, had you or have
10 you seen this letter before today?

11 A: I don't know. I'm not sure.

12 Q: Do you know what records, if anything, were
13 provided to Dr. Davis in Atlanta?

14 A: No, I don't. And I assume there was none. I
15 never saw him come in with papers or anything.

16 Q: So you don't know if he actually saw --

17 A: No.

18 Q: -- or reviewed anything?

19 A: I do not.

20 Q: Did you have a problem with Dr. Reamy's
21 treatment of you at Coastal Empire?

22 A: What do you mean by problem?

23 Q: I was hoping you would define that for me. Did
24 you have any issues with the way that he
25 treated you when you were at Coastal Empire?

1 A: He did what the court ordered. And as soon as
2 he realized and could, as soon as he could he
3 backed off the medicine and it kept getting
4 less, less, and less.

5 Q: Now, he didn't all the sudden stop the
6 medications, did he?

7 A: No, he couldn't do that.

8 Q: Okay.

9 A: He told me -- I came with a prescription for
10 Haldol and Risperdal injections. They would
11 give one then the other one then the other. He
12 was amazed. He said that those two medicines
13 did not do well together, and he would never
14 give me the Haldol, but he had a court order to
15 do it and he would have to do it. So he gave
16 it, to my recollection, one time to comply with
17 the court. And then he stopped it and
18 continued Risperdal only to the extent that he
19 had to. That's it.

20 Q: Now, you just said you got one Haldol
21 injection?

22 A: This is according to my memory.

23 Q: Okay.

24 A: This is according, and that complied with what
25 the court wanted. He had a prescription for

1 that, so he had to give it to me, a court
2 ordered prescription.

3 Q: All right. So you believe that the court
4 actually had a requirement that you receive at
5 least that first dose of Haldol?

6 A: Yes, that's what I believe.

7 Q: Do you understand that the court also said you
8 had to get an injection rather than could you
9 take it orally?

10 A: I ended up taking it orally. Not the Haldol.
11 I ended up taking the Risperdal --

12 Q: Orally?

13 A: Yeah.

14 Q: Okay. And that was during that one year time
15 period. Okay.

16 A: At Dr. Reamy's suggestion.

17 Q: Okay. Do you have any criticism with whatever
18 treatment you received from Dr. Elmore?

19 A: No.

20 Q: In that first paragraph of this letter in
21 Exhibit Six, July 5, 2006, I'm going to read
22 this into the record starting in the middle
23 where it says assuming. And tell me if I read
24 this correctly. "Assuming that her recent
25 hospitalization diagnosis and Dr. Reamy's

1 treatment diagnosis are accurate, she may be
2 vulnerable to a reoccurrence at some point in
3 the coming months to years whether or not she
4 is prescribed psychiatric medications. On the
5 other hand, a relapse to psychosis is not a
6 foregone conclusion." Did I read that
7 accurately?

8 A: You read it accurately, but what can he do in
9 15 minutes? That's all he saw me.

10 Q: What is your understanding of what he's saying
11 and what I just read?

12 **MR. DODSON:** Object to the form.

13 A: Answer the question?

14 **MR. DODSON:** Yeah, answer the question.

15 A: You're not going to like my answer.

16 Q: Your answer is whatever your answer is.

17 A: My answer is that's a cover your ass statement
18 by the medical society by him. He's just
19 covering obviously.

20 **MR. DODSON:** Watch your language.

21 A: Okay.

22 **MR. DODSON:** Watch the bad language, Martha.

23 A: Excuse. I'm sorry. I apologize.

24 **MR. DODSON:** No, that's all right.

25 Q: I've heard much worse.

1 A: Well, I mean, how else can I say it and not --

2 Q: That's all right. The beginning of the next
3 paragraph says, "Presently, the patient
4 presents in remission from her disorder." What
5 is your understanding of what being in
6 remission from your disorder would mean?

7 A: Wait a minute. The patient, present -- well,
8 it was disorder I never had, and he never saw
9 that. He never saw me during the time that
10 they say I, you know, I never had it. Don't
11 then, didn't then, don't now. And I apologize
12 again for the --

13 Q: All right. The next document is Exhibit Seven.

14 A: Yeah.

15 Q: Have you seen this document before? I assume
16 that this is the same document, but it is three
17 pages.

18 A: Is this document saying I have complied with
19 the court ordered medicine, is that what this
20 is?

21 Q: I'm not sure. I was going to ask you what your
22 understanding of what this document was.

23 **MR. DODSON:** You can take your time and read it.

24 A: Okay.

25 Q: Yeah, I'm not trying to rush you, so however

1 long it takes you to read this, please take
2 that time.

3 A: Well, let's see. I don't remember signing
4 this. But I will say this, it looks like my
5 signature. And when you go -- this was in the
6 beginning of my -- it looks like it was the
7 beginning of Coastal Empire, and again, when
8 you got in they put all this paperwork in front
9 of you and demand that you sign it.

10 Q: Were you given the opportunity to read through
11 whatever documents Coastal had provided to you
12 to sign?

13 A: Oh, no. Just sign.

14 Q: When you went to Coastal, were you there with
15 anybody or did anybody accompany you?

16 A: At times my son would go. At times, husband.
17 Maybe once or twice husband and son came.
18 Sometimes they sat in the waiting room. But I
19 remember finally telling them -- telling them
20 I didn't want them in the room. I didn't want
21 either one of them in the room.

22 Q: Where did you fill out the paperwork; was that
23 the first day?

24 A: Evidently it was, but I don't know that. 7/29,
25 that sounds about right when I got out. Yeah.

1 But that's probably my initial visit, but
2 that's my guess. But that's pretty close.

3 Q: Who was with you when you went to Coastal the
4 first time?

5 A: It was either husband or son or both. I don't
6 know.

7 Q: Do you recall who at Coastal you met with when
8 you first went there?

9 A: Oh, no. Oh, no. The girl at the desk,
10 whoever, you know, that was.

11 Q: Did you speak with a doctor or nurse or any
12 other type of clinician the first time you were
13 there?

14 A: I don't remember that. If you're asking me was
15 I given an exam, no.

16 Q: Did you ask any questions before you signed
17 this particular consent form?

18 A: Obviously I did not.

19 Q: Okay. What is your understanding of what
20 you're consenting to?

21 **MR. DOSON:** Objection.

22 A: Them to fill me full of medicine and treat me
23 whatever they want to. But what can you do?

24 Q: Did you have any conversation with any doctor
25 or any other health care providers about the

1 medications that they wanted to put you on
2 before signing this?

3 A: No. Again, though, this goes back to this was
4 court ordered for me and I complied with the
5 court. The court says these people will see
6 you. I was there. I signed their paperwork.

7 Q: So I shouldn't fault you for complying with a
8 court order to say that you needed to comply
9 with this?

10 A: Absolutely. Absolutely.

11 Q: You testified earlier that you asked for
12 information about the Geodon --

13 A: Geodon.

14 Q: -- Geodon, sorry. I keep thinking Gideons, but
15 Geodon.

16 (Off the Record Discussion)

17 Q: The Geodon, you asked for literature about
18 that?

19 A: Yes, I did.

20 Q: Did you ever ask for literature about the
21 Haldol or the Risperdal?

22 A: Yes, I did.

23 Q: Were you ever provided that?

24 A: I think I was. And it was in a folder that we
25 were given, and that was in my car and it

1 disappeared.

2 Q: Were you -- where were you when you were

3 provided that information?

4 A: At Three Rivers.

5 Q: Do you recall reading through that information?

6 A: At the time, yes.

7 Q: Do you recall anything about what those

8 information packets you had described the drugs

9 did?

10 A: Bottom line, it wasn't good.

11 Q: Well, what did you not like about it?

12 A: I didn't like anything it said. I didn't like

13 being on the drugs; I didn't like the way I

14 felt. And I certainly did not like the side

15 effects.

16 Q: But you were going to follow the court order

17 and make it through that year?

18 A: Yes. And I did.

19 Q: Have you ever had any heart attacks?

20 A: None that I know of.

21 Q: I'm handing you what's marked Exhibit Number

22 Eight. Just tell me if you have seen this.

23 And again, take your time to read through this.

24 A: This is basically the document saying I get my

25 property back; is that correct?

1 Q: Well, I'm asking you what is your understanding
2 of what this is?

3 A: That's my understanding of it.

4 Q: Okay. For the record, this is a document
5 entitled Covenant Not to Sue or Further
6 Litigate against Argoes that has in the body of
7 the first substantive paragraph that it was
8 entered on October 3rd, 2007.

9 A: In other words, I'm dropping the case.

10 Q: And that's dropping the case against your
11 husband and your son only?

12 A: Yes.

13 Q: And that's in the original action that was
14 filed in Beaufort and then the subsequent
15 action that was filed in Lexington, those were
16 all combined at some point?

17 A: Okay.

18 Q: Okay. Did this Covenant Not to Sue have
19 anything to do or was any part of this in
20 conjunction with the divorce proceedings you
21 had with your husband?

22 A: Attorney with Jan, attorney-client privilege?

23 **MR. DODSON:** Go ahead and start answering and if I
24 think you're saying something that -- I'll stop
25 you, okay?

1 A: I'll just spit it out. If I get my property
2 back and the divorce, we would drop the suits
3 against them.

4 Q: Okay. And this also says that \$130,000 was
5 paid on behalf of your husband and son to you,
6 correct?

7 A: Well, that went, again, legal fees.

8 MR. DODSON: Yeah, don't.

9 A: Okay. Sorry.

10 Q: I wasn't asking you where -- how you paid them,
11 but that amount of money was paid to you as
12 part of the settlement?

13 A: That's what it says on this paper.

14 Q: Okay. On the second page, in paragraph number
15 two, and your husband and son are generally
16 called together the Argoes.

17 A: Okay.

18 Q: It says the Argoes have withdrawn -- well, it's
19 a typo, but, "The Argoes have withdrawn all
20 claims in all courts to the effect that Martha
21 Lewin Argoe is mentally ill or incapacitated or
22 that she requires a guardian ad litem and will
23 take proactive efforts to retrieve or seal said
24 records." What actions did your husband and
25 son do to comply with that particular paragraph

1 that you're aware of?

2 A: Let's see. As far as I -- the guardian ad
3 litem leave they had appointed.

4 Q: What about the efforts to seal the record?

5 A: Evidently they wanted them sealed.

6 Q: Now, who wanted those sealed? Was that you or
7 was that them?

8 A: It must have been -- now work through me on
9 this. It must have been me because when the
10 commitment papers came through, they didn't
11 mind all of Orangeburg knowing this, and they
12 didn't try to keep it quiet and they didn't --
13 they made it available in the court house in
14 Orangeburg.

15 Q: Let me ask for a clarification before you go on
16 from that. When you say they, who are you
17 talking about?

18 A: Son and husband. Whoever. Son and husband,
19 whoever --

20 Q: Now, how -- or what do you mean by your son and
21 husband did not care that it was a public
22 issue?

23 A: They made no effort to seal it in Orangeburg
24 when I was committed. They made no effort to
25 -- they made no effort to seal it then.

1 Q: How do you think they should have tried to seal
2 up the records so that it would not be a public
3 document?
4 A: I don't know. But evidently the same way would
5 have worked.
6 Q: What do you mean the same way?
7 A: The same way right here, proactive to seal the
8 records. If I could seal it, they could have,
9 don't you think?
10 Q: Well, I'm asking you what do you think they
11 could have done to make it so that it would
12 have not be a public record?
13 **MR. DODSON:** Object to the form. Asked and
14 answered.
15 A: I'm not an attorney.
16 Q: Do you know whether or not the probate
17 proceedings are in fact a public or a private
18 proceeding?
19 A: I do not know.
20 Q: The next paragraph says, "Argoes shall
21 proactively cooperate with counsel from Martha
22 Lewin Argoe to expunge Martha Lewin Argoe's
23 commitment proceeding that took place in June
24 2005." What are you asking the Argoes to do in
25 that paragraph?

1 **MR. DODSON:** Objection to the form.

2 Q: You can answer. He's just --

3 **MR. DODSON:** You can still answer.

4 A: Well, expunge means get rid of. Let's see.
5 Evidently, erased from my record. Is that what
6 -- I don't know other than erased from my
7 record. Again, I'm not an attorney. I don't
8 know.

9 Q: Do you know how they could do that?

10 A: No, I don't.

11 Q: Do you know if they have made any efforts to do
12 that?

13 A: I do not.

14 Q: On the next page, paragraph number six, it
15 says, "The Argoes agree to the issuance of
16 restraining orders in all pending litigation as
17 to personal contact with Martha Lewin Argoe
18 other than when invited by writing, in writing
19 by her." Did you actually have restraining
20 orders taken out on your husband and son?

21 A: I don't know if it was actually done.

22 **MS. ARGOE:** Attorney-client with Jan? No?

23 **MR. DODSON:** Yeah, don't talk about anything that
24 you talked about with Jan.

25 A: Okay. Okay.

1 Q: So you don't recall if an actual restraining
2 order was, in fact, issued?

3 A: I don't know.

4 Q: But before October 3 of 2007, you had already
5 broken off contact with your husband and son
6 anyway?

7 A: Yes.

8 Q: Why didn't you sue your brother?

9 MS. ARGOE: Attorney with Jan?

10 MR. DODSON: Yeah, don't -- if you can answer the
11 question without relaying what Jan told you,
12 you can answer it. But if your only answer
13 comes from something that Jan told you, don't
14 answer the question.

15 MS. ARGOE: Well, all I know is what Jan told me.

16 MR. DODSON: Okay. Then don't answer the question,
17 attorney-client privileged.

18 Q: I think I know what your answer is going to be,
19 but the same question with your sister. Why
20 didn't you sue her?

21 MR. DODSON: Okay. And the same directive to you,
22 Ms. Argoe. If you can answer that question
23 without revealing anything that Jan Warner,
24 your former attorney, told you, then go ahead
25 and answer it. But if you can't answer that

1 question, then don't answer it.

2 A: I really can't, but it's a different reason
3 than my brother.

4 MR. DODSON: Okay. And that's fine.

5 Q: All right. So two different reasons, but both
6 of them were, from what you're saying, were
7 based on conversations you had with your prior
8 attorney?

9 A: Yes.

10 Q: What are you hoping to get out of this lawsuit
11 from my clients, Three Rivers and Nurse
12 Burrell?

13 A: I am hoping to get compensation for the time,
14 pain, stigma and effect -- and I am still
15 fighting this medicine. For 41 days and one
16 year that I was detained, drugged, and it was
17 nothing wrong with me and I did not need to be
18 and nobody even listened to me. No exam was
19 given.

20 Q: Who do you believe is the first person who
21 listened to you?

22 A: Listened to me? Think about that. The first
23 person that listened to me. Maybe, probably
24 Dr. Reamy in Beaufort. Dr. Davis went totally
25 with his tests.

1 Q: When you say his test, you're talking about the
2 test that Dr. Davis administered?

3 A: Davis administered. That's the only test I was
4 ever given. Psychiatric test I was ever given,
5 other than squeezing somebody's hand and
6 reflexes. That was the only test I was ever
7 given.

8 Q: How did Dr. Reamy listen to you?

9 A: I told him that I did not need to be there and
10 that they were -- they had committed me with my
11 ex-husband's say so and nobody would listen to
12 me, and I had had no tests and I -- was nothing
13 was wrong with me then and and there never was.
14 And --

15 Q: And Dr. Reamy tapered you off of the
16 medications?

17 A: He did.

18 Q: And now you don't have any medications?

19 A: None. As soon as the court -- as soon as I
20 complied with the court for a year, it was
21 over. No more.

22 Q: Did Dr. Davis speak with any of your other
23 doctors that had treated you?

24 A: Doctor?

25 Q: Davis. When you saw him?

1 A: No, no, no. I mean I really don't know 100
2 percent, but no, he didn't.

3 Q: Okay. So as far as you know, all he did was
4 administer --

5 A: Yeah, he did his own evaluation with what he
6 saw.

7 Q: All right. That's all the questions I have
8 right now. Thank you for your time.

9 **MR. DODSON:** Do we need to take a short break?

10 (Break from 4:30 p.m. until 4:38 p.m.)

11 **MS. ARGOE - EXAMINATION BY MR. DAVIDSON:**

12 Q: Ms. Argoe, my name is Will Davidson. I'm an
13 attorney and I'm representing Dr. Mobley. You
14 mentioned earlier that you had -- I think you
15 said you had problems with diarrhea presently?

16 A: Very much so.

17 Q: You have, I think you said something about a
18 thyroid issue; is that right?

19 A: Yes.

20 Q: Okay. Other than the diarrhea and the thyroid,
21 any other medical problems you presently have?

22 A: I have an irregular heartbeat that I did not
23 have when I went in Three Rivers. And I have
24 elevated kidney albumin that I did not have
25 before I went in there.

1 Q: All right. Now, who treats you for your
2 thyroid issues?

3 A: Dr. Cornell, my gastroenterologist in Myrtle
4 Beach found it. He said he didn't treat it; I
5 would have to go to someone else.

6 Q: Have you been to someone else?

7 A: It was during the time of the flu. There was
8 no vaccine available for the general public.
9 Healthcare workers got it but nobody else. The
10 offices were full of it to the point where you
11 had to take a number and sit in your car. And
12 I was fighting the effects of the medicine; I
13 had diarrhea; I was weak; and I didn't think I
14 needed the flu. So I stayed out and I started
15 feeling better.

16 Q: Now, my understanding, you would have come off
17 the medicines sometime in July of '06; is that
18 right?

19 A: Well, whenever the paperwork says.

20 Q: The thyroid, when did you have -- when was that
21 diagnosed?

22 A: I had had tests before and it was all right.
23 I had tests in Three Rivers and it was all
24 right. When I finally got to my
25 gastroenterologist, Dr. Cornell, he ran tests

1 on my thyroid -- and celiac disease, he wanted
2 to make sure I didn't have that, and I don't.
3 It's negative. But hypo, that means less is
4 the way I understand it, is what I had. And he
5 said that it needed to be treated.

6 Q: And do you know when that was? What year?

7 A: Well, the record will show it. It was in
8 Myrtle Beach. I went there in 2007. It was
9 before Joan died, so it had to be -- his record
10 will show it when I first approached him.

11 Q: Well, assume you said 2007. Let's say 2008.
12 It's now 2012. You haven't gone to anyone for
13 any evaluation or treatment or medication --

14 A: Over the thyroid.

15 Q: -- over the thyroid?

16 A: No.

17 Q: Okay. And has Dr. Cornell given you any
18 medication for your thyroid?

19 A: No, he has not.

20 Q: And Dr. Cornell has treated you for diarrhea?

21 A: Yes.

22 Q: Okay. And has he treated you for anything
23 else?

24 A: No.

25 Q: When did you -- do you know the year that you

1 first saw Dr. Cornell?

2 A: Well, I would have to guess it was eight or
3 nine.

4 Q: Okay.

5 A: That's a guess.

6 Q: All right.

7 A: But the record will show that when --

8 Q: And the other medication you take, do you take
9 any other -- this powder you take three times
10 a day, what is that powder?

11 A: Clorasemin (ph) or septin (ph) or something
12 like that.

13 Q: Has he indicated to you any reason for your
14 diarrhea?

15 A: He says he does not know.

16 Q: Okay.

17 A: But he gives me a list of things it's not.

18 Q: Okay. All right.

19 A: Which is nothing that his tests show.

20 Q: Now, you've also said something about a heart
21 arrhythmia. When did that develop? What year?

22 A: After -- after Three Rivers. It developed
23 after Three Rivers.

24 Q: I understand. That's been a long time because
25 you got out of Three Rivers in 2005.

1 A: Uh-huh (affirmative response).

2 Q: So that's been seven years. When in that seven

3 year period did you develop the heart

4 arrhythmia?

5 A: Immediately.

6 Q: Immediately?

7 A: Just about immediately.

8 Q: All right. And who is treating you for the

9 arrhythmia?

10 A: Nobody.

11 Q: Nobody?

12 A: Nobody.

13 Q: And have you seen anyone for your heart

14 arrhythmia in the last two years?

15 A: No. Other than every time I go into a doctor's

16 office, of course, and they listen to my heart.

17 Q: Well, have they told you what kind of

18 arrhythmia you have?

19 A: No, they have not.

20 Q: Okay. I assume no one has told you that it is

21 life threatening or you would have gone to a

22 doctor to be treated?

23 A: Nobody has told me that.

24 Q: Any other --

25 A: The first time they -- I had those -- before I

1 went into Three Rivers I had a stress test and
2 everything was fine. After I had been in Three
3 Rivers and drugged, they found, with their own
4 cardiogram there at the -- I don't know,
5 irregular heart beat.

6 Q: Well, let me ask you this. After Three Rivers,
7 have you been to anyone, cardiologist or anyone
8 like that --

9 A: No.

10 Q: -- to be examined or to look at your heart?

11 A: No.

12 Q: Have you had a stress test since then?

13 A: No.

14 Q: You said that your father moved from New
15 Hampshire to South Carolina as a result of a
16 medical problem?

17 A: Yes.

18 Q: What was that?

19 A: Coronary.

20 Q: Okay. And when he passed away, how old was he?

21 A: Fifty-six.

22 Q: And what did he pass away from?

23 A: A heart attack.

24 Q: Heart attack?

25 A: Coronary seclusion.

1 Q: What about your mother; when did she die?

2 A: Maybe '86. That's a guess.

3 Q: What did she die from?

4 A: Pneumonia. Basically it says pneumonia and --
5 she was treated a long time and she was
6 diagnosed with lymphoma in Charleston. She
7 went -- she was given chemotherapy. She went
8 to Houston, Texas. They said she didn't have
9 it. They sent for the slides from Charleston
10 and said the slides were misread, that she
11 never had it. So they took her off of the
12 leukemia and she just kind of went downhill
13 from there.

14 Q: And how old was she when she passed away?

15 A: Seventy or 71. I think 70.

16 Q: Other than the problem with questionable
17 lymphoma, did she have any other health
18 problems?

19 A: Asthma. That's how I knew the breathing
20 exercises.

21 Q: Anything else?

22 A: She had an irregular blood count that nobody
23 could understand.

24 Q: And I think you said you actually went to Dr.
25 Conner sometime around 2008, best of your

1 recollection?

2 A: Say again. Who?

3 Q: Dr. Conner.

4 **MR. PARHAM:** Cornell.

5 A: Cornell

6 Q: Cornell, excuse me.

7 A: I was going to say who is Dr. Conner.

8 Q: I wrote it down wrong. Cornell.

9 A: Yes.

10 Q: Okay. Now, my understanding also from your

11 testimony, besides Mr. Dodson, Mr. Warner was

12 your attorney?

13 A: Yes.

14 Q: And prior to Mr. Warner you had talked with a

15 Ken Mathews?

16 A: Yes.

17 Q: I don't want to know what y'all talked about.

18 Had you talked with anyone prior to Mr. Mathews

19 as an attorney?

20 A: Lewis Lanier when he -- in Orangeburg when he

21 made another will.

22 Q: All right. Now, in 2005 when you were at

23 Charter Rivers and got out, when in

24 relationship to you getting out of Charter

25 Rivers did you first go see a lawyer?

- 1 A: Well, it was -- it was after I got -- first of
2 all, that year, I was so debilitated. I
3 believe it was after I complied with the court
4 order and took those drugs I didn't need. I
5 believe that's when it was.
- 6 Q: Now, would that have been Mr. Mathews or would
7 that have been Mr. Warner?
- 8 A: Well, Mathews was first.
- 9 Q: Okay. Now, you also, at the probate hearing on
10 June 21st, you said you met with --
- 11 A: June 21st what year?
- 12 Q: 2005. That probate hearing that we've talked
13 about. You said that --
- 14 A: In Three Rivers?
- 15 Q: In Three Rivers.
- 16 A: Okay.
- 17 Q: There was a gentleman there that was supposed
18 to represent your interests?
- 19 A: Yes.
- 20 Q: Does the name Alvin Neal sound right?
- 21 A: Yes, yes it does.
- 22 Q: Okay. Got a beard?
- 23 A: I think so.
- 24 Q: A little short fellow?
- 25 A: Yeah, I couldn't have come up with it. That's

1 him.

2 Q: Now, Mr. Neal was there, to your understanding,

3 not only as your guardian, but also as your

4 attorney, was he not?

5 A: He was representing me. I don't know in what

6 capacity.

7 Q: Did you essentially tell him --

8 MR. DODSON: Wait a second.

9 Q: I'm just asking her what she --

10 MR. DODSON: All right.

11 Q: She's already kind of gone into it.

12 MR. DODSON: She may have. You can go ahead and ask

13 the question.

14 Q: Did you basically tell him the types of stuff

15 you have told us today?

16 MR. DODSON: Objection. Attorney-client privilege.

17 Is Mr. Neal -- y'all seem to be laughing it up

18 like y'all know Mr. Neal. Is he a lawyer?

19 MR. DAVIDSON: Yeah, he's a lawyer.

20 MR. DODSON: Then I'm going to direct her not to

21 answer that under attorney-client privilege. I

22 didn't realize he was a lawyer until just now.

23 A: Neither did I.

24 Q: Well, let me ask you this. He was there as a

25 lawyer appointed for you by the court in the

1 probate hearing; are you aware of that?

2 A: I am now. I didn't know who -- I didn't know
3 he was an attorney.

4 Q: Did you talk to him before the hearing?

5 A: For about two minutes before I went in.

6 Q: Did you at any time during the hearing, or even
7 after the hearing, request the court to appoint
8 you another lawyer or contact anyone to get you
9 a lawyer?

10 A: No, I didn't know that I could. And also,
11 going back to what I said earlier, I was so
12 drugged. If anybody, any one of you have ever
13 been that drugged, you would understand how
14 debilitating it was.

15 Q: Did you appear debilitated to Mr. Neal? In
16 other words, were you essentially, based on
17 your recollection of the way you acted and your
18 appearance, did you present that appearance to
19 Mr. Neal?

20 **MR. DODSON:** Object to the form. You can still
21 answer the question, Ms. Argoe.

22 A: I was fighting the drugs. I sat at the table.
23 I did my best to hold my head up.

24 Q: Okay. You said you were trying to hold your
25 head up?

- 1 A: I was trying to hold my head up.
- 2 Q: You were drooling?
- 3 A: I was drooling.
- 4 MR. DODSON: Let her finish her answer, Will.
- 5 Q: You were incoherent?
- 6 MR. DODSON: Let her finish her answer.
- 7 A: I didn't say incoherent now, I knew what was
- 8 going on.
- 9 Q: Okay.
- 10 A: With that medicine, you can have you head down
- 11 drooling and appear to be incoherent, but you
- 12 are totally -- you know what's going on in your
- 13 mind, you 'just -- it's just hard to respond
- 14 without a lot of effort.
- 15 Q: All right. You were sitting at a table?
- 16 A: I was sitting at a table outside the first time
- 17 I saw him.
- 18 Q: Okay.
- 19 A: In the courtroom, I was not at a table.
- 20 Q: Were you sitting in relation to Mr. Neal?
- 21 A: I was sitting to the left of the door as you go
- 22 in. And I don't remember Mr. Neal sitting
- 23 down. I remember him standing.
- 24 Q: Judge was present?
- 25 A: He was.

1 Q: Were you readily observable by Mr. Neal and the
2 judge in regard to being droopy or drooping
3 over and drooling at where you were sitting?

4 **MR. DODSON:** Object to the form. You can still
5 answer that.

6 A: Probably not because I sucked it up and gave
7 every effort and ounce I had in my whole body
8 to hold my head up and just sit there in the
9 chair.

10 Q: All right. Let's make sure we understand.

11 A: Okay.

12 Q: Because you said earlier that you were drooped
13 over trying to hold your head up?

14 A: I was.

15 Q: And you were drooling?

16 A: I was.

17 Q: Now, were you drooling or not?

18 A: I was drooling --

19 **MR. DODSON:** Objection. Asked and answered. Go
20 ahead.

21 A: I was drooling. Not as badly as I had been
22 able to and did, but I was drooling somewhat.

23 Q: All right. And was your head drooped over?

24 A: At times.

25 Q: Okay. And were you in an area that you could

1 be observed by the court, by the judge?

2 A: Oh, yes.

3 Q: Now, the medication that you said you received
4 sometime the day of the hearing, do you
5 remember what time the hearing was?

6 A: No, I don't.

7 Q: Do you remember what time you received the
8 medication?

9 A: No, I don't.

10 Q: I'm going to read you something and see if this
11 refreshes your memory about it. "Patient seen.
12 Discussed with staff as well as with family at
13 probate hearing where she was ultimately
14 retained." If you disagree with something, let
15 me know.

16 A: Well, who's writing this?

17 Q: Let's just read it first, then we'll discuss
18 who's writing it. "Family. including brother,
19 who is a physician, as well as her sister in
20 addition to son and husband." Do you remember
21 all those people being there?

22 A: Oh, yes. I told you that.

23 Q: "Corroborate that the patient has been manic
24 and continues to be paranoid and delusional.
25 Family recounts how patient stays up all night,

1 watches religious TV on three different
2 televisions throughout the house all day." Is
3 that true?
4 A: No.
5 Q: Do you remember them telling the court that?
6 A: They didn't speak. In my presence, they did
7 not speak anything.
8 Q: Okay. "Talks rapidly with disordered thought
9 and claims that she is casting out demons and
10 is seeing witches and warlocks." Do you
11 remember anyone saying anything about that?
12 A: I do not and that is not true.
13 Q: "Patient herself in court admits to carrying a
14 gun." Did you carry a gun back in those days?
15 A: Yes, I'm a concealed weapons carrier. I have
16 a license.
17 Q: You have one today?
18 A: I do.
19 Q: Is it here?
20 A: No, it's not allowed here.
21 Q: Where is it?
22 A: It's at home.
23 Q: Do you have your concealed license permit?
24 A: Yes.
25 Q: With you today?

1 A: Yes.

2 Q: Can we see it?

3 A: Yes, be glad to show it to you. (Witness
4 complies.)

5 (Off the Record)

6 (Defendant's Exhibit Number Nine was marked for
7 identification purposes.)

8 Q: How long have you had a concealed permit?

9 A: I have just testified that it was probably
10 about seven years.

11 Q: Why did you get a concealed weapons permit?

12 A: Well, I live in Orangeburg, and I was in
13 Woody's Pawn Shop buying my son a gun that he
14 wanted. And the instructor for the class was
15 in the shop, and we were talking and it sounded
16 like a good class to have, and I've always been
17 interested in firearms. So I signed up.

18 Q: Did you maintain the weapon at home?

19 A: I did.

20 Q: Did you have the weapon and the permit when
21 your husband was abusing you?

22 A: Yes.

23 Q: Did he, or was he aware that you, in fact, had
24 a weapon and a permit?

25 A: Oh, yes. He was -- I had to give up my

1 Saturdays with him because we had our range.
2 You have so many hours in the classroom and so
3 many hours on the range. And we had to do the
4 part of the test on the range on Saturdays. So
5 he was very well aware.

6 Q: Did you ever tell him if he ever hit you again
7 you would shoot him?

8 A: No.

9 Q: Did you ever threatend him with the weapon?

10 A: No.

11 Q: Now, it goes on to say, "She says she has been
12 trained by the FBI."

13 A: I never said that.

14 Q: "Doesn't want to talk about her having hidden
15 a \$75,000 Corvette from her family or her
16 belief that her husband had a second family
17 because these are not medical issues."

18 A: No, I never said anything like that.

19 Q: Okay. "Patient represents a danger to self and
20 others due to her paranoia and fear of
21 husband." Did you fear your husband?

22 A: Yes, I feared my husband.

23 Q: "And the fact that she always carries a gun to
24 protect myself from him." Do you remember
25 telling them that?

1 A: No, I don't remember that.

2 Q: You deny you told him that or you just don't --

3 A: I don't remember saying that.

4 Q: Okay. "She has no insight. Said in court she

5 is not ill and will not take medication when

6 discharged, will discontinue Geodon, administer

7 Risperdal constant today and start Risperdal in

8 tablets by mouth, Cogentin as needed for EPS.

9 Family also are in possession of patient's

10 'secret cell phone' on which she has been

11 receiving a lot of restricted phone calls."

12 You had a phone at Three Rivers, correct?

13 A: No. Nobody has a phone at Three Rivers.

14 Q: You had one secreted, did you not?

15 A: What does secreted mean?

16 Q: Hidden.

17 A: Not at Three Rivers.

18 Q: Okay. It says, "She has been receiving a lot

19 of restricted phone calls. They suspect from

20 people advising patient against listening to

21 the family or from telling or complying with

22 medicine compliance. They know for sure that

23 one woman who is into demonic worship with whom

24 she is in constant contact," they're referring

25 to the lady out of Tyler, Texas, there; are

1 they not?

2 A: She never called me in Three Rivers. because she
3 didn't know where I was.

4 Q: My question is, they're referring to the lady
5 from Tyler, Texas; is that correct?

6 **MR. DODSON:** Objection. Object to the form. You
7 can go ahead and answer if you know.

8 A: Well, evidently. There's nobody else.

9 Q: Okay. "Will place patient on phone restriction
10 at family's request as this indeed may be
11 counter-therapeutic." Do you remember that?
12 Do you remember any of that being said?

13 A: No. No, I just know that I was restricted from
14 using the telephone as the family's request.
15 That's all. Nothing else.

16 Q: That was written by Dr. Mobley. She had to get
17 that information from somewhere, didn't she?

18 A: Well, she didn't get it from me.

19 Q: She got it from the family?

20 A: Evidently.

21 Q: Family, your brother, your sister, your husband
22 and your son, one or all of those people
23 corroborated that type of information to Dr.
24 Mobley?

25 **MR. DODSON:** Object to the form.

1 A: Is that your understanding?
2 MR. DODSON: Object to the form.
3 A: Didn't come from me.
4 Q: Had to come from somewhere?
5 A: Right.
6 MR. DODSON: Object to the form.
7 A: But it didn't come from me.
8 Q: And you're not talking to your family?
9 A: No.
10 Q: You're not talking to your brother?
11 A: No.
12 Q: Not talking to your sister?
13 A: No.
14 Q: Haven't got a thing to do with your son?
15 A: Nothing.
16 Q: And I assume you're not displeased your husband
17 has passed away?
18 A: Not at all.
19 Q: How many times while you were at Three Rivers
20 do you recall seeing Dr. Mobley?
21 A: Not many because I saw her some and then she
22 left for vacation at --
23 Q: Go ahead.
24 A: -- while she was on vacation, I was appointed
25 someone else.

1 Q: Did she tell you she was going on vacation?

2 A: I don't know that she did. I don't know. It
3 was general knowledge in the, it was general
4 knowledge in Three Rivers that she was going on
5 vacation.

6 Q: Did you recall, other than this one
7 conversation before the hearing, do you recall
8 any other conversations you had with Dr.
9 Mobley?

10 A: When I first came in, yes.

11 Q: What do you remember her saying?

12 A: Not much.

13 Q: Well, tell me what you remember.

14 A: I don't remember anything.

15 Q: Okay. Do you remember any conversations she
16 would have had with you other than this one
17 before the hearing?

18 A: That's the only one I recall, but I am sure
19 that I explained that this was a spousal abuse
20 situation because I explained it to everybody.

21 Q: So even though you saw Dr. Mobley at other
22 times at Health South, or Three Rivers is what
23 it was called back then, you don't recall any
24 other conversations with her other than this
25 one time before the hearing that you've already

1 talked about?

2 A: There were conversations.

3 Q: Do you remember what was said?

4 A: No.

5 Q: Okay.

6 A: But I'll never forget the last one.

7 Q: Do you recall -- other than Dr. Mobley, do you

8 recall ever meeting with anyone who

9 administered any tests to you while you were at

10 Three Rivers?

11 A: No tests.

12 Q: Okay.

13 A: Other than, like I said, Dr. Davis in Atlanta,

14 but none in Three Rivers.

15 Q: When you went to Dr. Davis in Atlanta with Mr.

16 Warner.

17 A: Yes.

18 Q: Did you ride over with Mr. Warner?

19 A: I did.

20 Q: Did he take anything with him?

21 A: Take anything with him? I don't think so.

22 Q: Okay.

23 A: I mean his car.

24 Q: To your knowledge, did Dr. Davis have any

25 medical records when you got to --

1 A: Oh, no. Oh, no.

2 Q: Did you -- were you introduced to Dr. Davis by
3 Mr. Warner?

4 A: No, neither one of us had seen him. I was
5 given paperwork and a clipboard while I was in
6 the waiting room and I was filling out the
7 forms, and he came out of his office and said,
8 I am Dr. Davis, and that's -- that's the way I
9 -- and he introduced himself to Jan, or however
10 it went.

11 Q: Did it appear that Mr. Warner knew Dr. Davis?

12 A: No, not at all.

13 Q: Did Dr. Davis, Mr. Warner, and you go back to
14 his office?

15 A: Did the three of us go back to his office?

16 Q: Yes, ma'am.

17 A: After he was through questioning and examining
18 me, Mr. Warner may have come in after we were
19 finished with what we were doing.

20 Q: Okay. What do you remember about that
21 conversation?

22 A: Just the fact that there was nothing wrong with
23 me, that I got 100 on my test, and that if they
24 tried to put me back in a mental institution
25 again, he would personally fly to Columbia and

1 testify.

2 Q: Did he have any -- to your knowledge sitting
3 there that day, were you aware whether he had
4 any records from either the South Carolina
5 Department of Health --

6 A: No.

7 Q: -- or from Three Rivers?

8 A: No, he --

9 Q: Or any records from Dr. Mobley?

10 A: No.

11 Q: Did you or Mr. Warner tell him about your
12 lawsuit?

13 A: I didn't.

14 Q: Did Mr. Warner tell him about the lawsuit?

15 A: I don't know what was said.

16 Q: Okay. Do you remember Mr. Warner advising him
17 that he would need to give an affidavit?

18 A: No.

19 Q: Do you remember Mr. Warner advising Dr. Davis
20 that he would be paid for his consult?

21 A: No.

22 Q: Did you pay Dr. Davis?

23 A: It was my money.

24 Q: How much did you pay him?

25 A: I don't recall.

- 1 Q: Did you pay him or did Mr. Warner pay him?
- 2 A: It was not me.
- 3 Q: Did you even know who Dr. Davis was?
- 4 A: Did I know who he was when he came out?
- 5 Q: No, ma'am. Before you went over there, did you
- 6 have a clue who Dr. Davis was?
- 7 A: Yes. Jan had to tell me where we were going.
- 8 Q: Okay. Did you consult or talk with any
- 9 psychiatrist in the state of South Carolina
- 10 about your case against Three Rivers or the
- 11 individuals?
- 12 A: No, other than the ones I was assigned to, and
- 13 you know all of those.
- 14 Q: So Mr. Warner never got you to go see a
- 15 psychiatrist in the state of South Carolina?
- 16 A: Oh, oh, oh, yes. Dr. Quinn. Oh, I'm sorry, I
- 17 didn't understand the question. Yes, I saw Dr.
- 18 Washington; I saw Dr. Quinn; and I saw DeWitt,
- 19 Dr. DeWitt.
- 20 Q: Okay. Who set those appointments up?
- 21 A: I found Dr. Washington by myself, and Jan got
- 22 me with Dr. Quinn and Dr. DeWitt.
- 23 Q: Okay.
- 24 A: I'm sorry I didn't understand.
- 25 Q: Did you go to those doctors and do any type of

1 testing with them?

2 A: Yes, somewhat. Dr. Quinn did a verbal test

3 with me, yes.

4 Q: What about Dr. DeWitt?

5 A: Well, I saw him and we talked.

6 Q: Did he do any testing?

7 A: Probably in his own way he did, but as far as

8 saying this is a test, take it, no.

9 Q: Nothing where you would fill out something or

10 do a checkmarks or --

11 A: Not that I remember.

12 Q: -- use a computer to type in stuff?

13 A: Not that I remember.

14 Q: The last conversation you remember with Dr.

15 Mobley, is that the one before the hearing?

16 A: Yes.

17 Q: Did you ever talk with her after the hearing?

18 A: No.

19 Q: Did she ever talk with you after the hearing?

20 A: No, not that I remember. Not that I remember.

21 Q: Would I be correct, Ms. Argoe, that if you boil

22 your case down, what it amounts to is nobody

23 would listen to you and accept your side of the

24 story that this all resulted from spousal abuse

25 and your husband trying to get you put away?

1 **MR. DODSON:** Object to the form. You still answer.
2 A: I was detained and drugged and if anybody had
3 even tested me or spent time listening to me,
4 they would have realized this. I had no test,
5 very little conversation.
6 Q: Well, make sure I understand.
7 A: Okay.
8 Q: Boils down to nobody would listen to you?
9 A: It boils down to --
10 **MR. DODSON:** Object to the form. You can still
11 answer.
12 A: It boils down to the fact that I was never
13 properly tested.
14 Q: So if somebody had given you a test and they
15 had come up with that you, in fact, were having
16 issues, you wouldn't be here today?
17 **MR. DODSON:** Object to the form. You can go ahead
18 and answer.
19 A: That would never have happened because there is
20 nothing wrong with me; there wasn't then and
21 there's not now.
22 Q: Well, obviously your whole family told people
23 that something was wrong with you, didn't they?
24 A: I don't know what they said but I'm -- I hear
25 -- I hear what you're saying.

1 **MR. DODSON:** Object to the form.

2 Q: Obviously, your husband, your son, your
3 brother, and your sister, the four people, at
4 least in 2005, that had been around you the
5 most in your lifetime, correct?

6 A: The brother and sister and son were not around
7 me much. He lived in Beaufort, practiced
8 medicine. Sister was not there, son was
9 working in Greenville. They did not see me
10 very much, especially brother and sister. They
11 were not around.

12 Q: They all came to the hearing?

13 A: That's right.

14 Q: And none of them, to your recollection, stood
15 up in front of the court and told the judge
16 there's nothing wrong with Martha?

17 A: They did not.

18 Q: And in fact, what you remember them hearing is
19 that she had a problem, she needed medication,
20 and she needed to stay at Three Rivers,
21 correct?

22 A: They said nothing in court while I was there.

23 Q: Well, I thought you said that Dr. Mobley --

24 A: No.

25 Q: -- said some things in court while you were

1 there?

2 A: Dr. Mobley did, but not my family.

3 Q: I'm not talking about that. Dr. Mobley said
4 that you had a problem, you needed medicine and
5 you needed to stay at Three Rivers --

6 A: She says I think --

7 **MR. DODSON:** Objection. Go ahead and answer.

8 A: I think she does, is what she says.

9 Q: All right.

10 A: I think she does.

11 Q: And the judge, in fact, agreed and ordered that
12 you stay at Three Rivers until they felt it was
13 appropriate for you to be released and that you
14 get outpatient treatment for a year afterwards,
15 correct?

16 **MR. DODSON:** Object to the form. You can go ahead
17 and answer.

18 Q: Is that your understanding of what the judge
19 said?

20 A: The judge put the gavel down and says one year
21 on medicine. And I'll never forget it.

22 Q: Did at any point since you sucked it up and
23 were trying to listen to what was going on, did
24 at any point your husband; your son; your
25 brother, who's the doctor; or your sister ever

1 stand up and say absolutely not, there's
2 nothing wrong with Martha?

3 A: They said nothing one way or the other, at my
4 request. I had the right to -- I was asked, I
5 had the right to prevent them from testifying
6 and I did. I didn't want to hear from any of
7 them.

8 Q: Thank you for that answer. I have no further
9 questions.

10 **MR. PARHAM:** Keep going?

11 **MR. DODSON:** You're next.

12 **MS. ARGOE:** Okay.

13 **MS. ARGOE - EXAMINATION BY MR. PARHAM:**

14 Q: Ms. Argoe, tell me all the conversations you
15 remember having with Dr. Dodds.

16 A: Oh, there were many with her. She took over
17 when Mobley went on vacation, and then Mobley
18 came back and she just kept me. I just stayed
19 with her. Or she kept me. I had no choice in
20 anything. She would ask me nearly every time
21 I saw her if I was going back to Lewis, and
22 every time I told her absolutely not, and every
23 -- and then that night there would be more
24 drugs assigned to me. And finally toward the
25 end, I told her, I said, you can drug me until

1 I can't get up off the floor, I am never going
2 back to him. She was talking sexually. And
3 she asked me was I afraid that he was going to
4 come in and get me and -- through the air
5 conditioner. I said no, he would never do
6 anything where he would be caught ever. And
7 then she asked me at one point in time did I
8 have a visit on Saturday. And I said no, they
9 wouldn't give up their Saturday to come visit
10 me, and of course, next Saturday, they were
11 right there. And, let's see, what else do I
12 remember about her? Just that the drugs kept
13 coming from her, kept increasing and
14 increasing. I got some drugs assigned to me
15 that were not even mine. I got seven drugs
16 assigned to me, and I made a fuss and I said
17 they were not mine. And I made enough of a
18 fuss that someone looked at it and realized
19 there had been a mistake, and I did not take
20 them. I did not take them. One of them was a
21 diuretic and if there was anything I knew I --
22 you know, diuretic would have put me out. I
23 barely was a size two to four. And I fussed
24 and fussed and finally they realized that they
25 had assigned me the wrong drugs. Getting back

1 to Dr. Dodds. She had me drugged to the point
2 where my head would absolutely not come up off
3 my chest. Again, forced drugs through the
4 line, checked my mouth, follow me to the room,
5 and it was something that poofed in there
6 anyway as soon as it touched my saliva. The --
7 finally, had a weekend that came. And we got
8 a doctor that I did not know, had not seen
9 before and have not seen since, and I -- he was
10 trying to talk to me. And I was sitting on my
11 bed, and I can remember telling him that I am
12 sorry that I'm not able to have a conversation
13 with him, that I was too drugged. And he
14 backed off the medicine. He backed off the
15 medicine, and I came back a little bit from
16 that. What else do you want to know?

17 Q: I want to know all the conversations.

18 A: That's all I remember.

19 Q: So everything you've told me, that's all you
20 can remember? There's nothing more?

21 A: Not right now.

22 Q: Well, I mean, we'll stay here all day. I want
23 to know what you remember right now, not two
24 years from now.

25 MR. DODSON: Object to the form. You can still

1 answer. Don't be argumentative.

2 A: Okay.

3 Q: What else do you know right now? That's what

4 I want to know.

5 A: Right now, nothing.

6 Q: You think you're going to remember something

7 later on?

8 A: I might.

9 Q: Will you tell Mr. Dodson that so I can ask you

10 some more questions?

11 A: I will.

12 Q: Okay. Who's the doctor that you said back off

13 the meds?

14 A: I do not know. I do know this, he was, I don't

15 mean to racially profile, but this -- you asked

16 me this before. He was a white man, and I was

17 sitting on my bed and he was about, he was

18 leaning over. I don't think he was too tall.

19 Q: Dr. Dodds took over your care, according to the

20 record, on June 27, 2005. When do you think,

21 in your mind, she should have discharged you

22 from the hospital?

23 A: Immediately. There was nothing wrong with me

24 except I was drugged.

25 Q: So you think that she could come in that day,

1 assessed you and she should have discharged
2 you?

3 A: If she had paid any attention, she would have.
4 If she had examined me properly, she would
5 have, if she was -- if she was a conscientious
6 medical person.

7 Q: You understand that in addition to Dr. Mobley-
8 Bryant and Dr. Dodds that throughout your stay
9 at Three Rivers, you had other psychiatrists
10 treating you, right?

11 A: Okay. Mobley, Dodds and who?

12 Q: I said you had other --

13 A: Yeah, but you gave me three. Who was the other
14 one?

15 Q: No, ma'am. Mobley-Bryant, same -- Dr. Mobley.

16 A: Oh, okay. Okay.

17 Q: It's a hyphen, sorry.

18 A: Okay. Okay. I --

19 Q: My question is do you remember having other
20 psychiatrists besides the two of them treating
21 you during that admission to Three Rivers?

22 A: Those two and then the other man that came in
23 on the weekend and backed off my medicine. And
24 I don't know his name.

25 Q: Did he listen to you?

- 1 A: Somewhat, but all I could get out because of
2 the drugs were I'm sorry that I can't talk to
3 you because I can hardly hold up my head, I am
4 too drugged. And that's about all I told him
5 because, at the time, I was so debilitated
6 that's about all I could say.
- 7 Q: So if there were other psychiatrists that
8 treated you during the admission to Three
9 Rivers besides Dr. Dodds and Dr. Mobley and
10 they came in to assess you and if they had
11 listened to you, they should have discharged
12 you that same right?
- 13 A: Absolutely.
- 14 **MR. DODSON:** Object to the form.
- 15 A: Well --
- 16 **MR. DODSON:** No, no, no, that's fine. It's fine for
17 you -- like I told you, if you hear me say
18 something, you answer unless I tell you not to,
19 okay?
- 20 Q: Now, did you ask -- when Dr. Mobley came back
21 from her vacation, did you ask for her to come
22 treat you again instead of Dr. Dodds?
- 23 A: No.
- 24 Q: Did you ever ask Dr. Dodds to discharge you?
- 25 A: No, it was pretty much not up to me.

1 Q: Did you ever ask Dr. Dodds why you continued to
2 be admitted and staying in Three Rivers?

3 A: No, she was telling me why. Oh, I remember
4 another conversation with Dr. Dodds. She was
5 going to put me in assisted living in
6 Orangeburg rather than let me go back to the
7 house because I was hollering spousal abuse.
8 I hollered it to everybody. And she was -- she
9 was not going to send me back to Orangeburg.
10 She was going to put me in an assisted living
11 Orangeburg. Glad I remembered that one right
12 then.

13 Q: Do you remember a Tammy Leonart, L-E-O-N-A-R-T?

14 A: Possibly. Possibly I do. She listened to me
15 about spousal abuse. She listened.

16 Q: Do you know who she was?

17 A: No.

18 Q: Did she do anything besides listen to you about
19 spousal abuse?

20 A: No, and I only saw her once, according to my
21 recollection. That's all. What else you want
22 to know?

23 Q: Is that it for her?

24 MR. DODSON: Object to the form.

25 Q: Is that all she did for you is listen?

1 A: Yes, as far as -- yes, yes. There were no
2 drugs prescribed by her that I know of.

3 Q: Anything else she did besides listen to you in
4 a conversation?

5 A: Well, she talked to me.

6 Q: Well, yes, ma'am, in the conversation besides
7 listen to you?

8 A: No.

9 Q: Okay. You'd talked earlier about leaving your
10 room in a orderly condition and coming back and
11 having it all messed up, correct?

12 A: Right.

13 Q: And did you ever attempt to put a lock on your
14 room to keep people from going into it?

15 A: No. No, I did not. I put one on so I could be
16 secure inside the room.

17 Q: Well, if you were coming back to your room
18 after leaving at night and finding the room
19 completely messed up and somebody in there, why
20 didn't you put a lock on there to keep them
21 from going in like you did to keep anybody from
22 coming in at night?

23 A: Well, first of all, I didn't think of it. And
24 then I also realized that it was obviously my
25 ex-husband going in there because who else

1 would it be have access to the house. And he
2 wouldn't have let a door stop him. He would
3 have gone right in anyway.

4 Q: Well, then if you thought he was going to come
5 in anyway, why did you put a lock so that
6 people couldn't come in?

7 A: Because when I was in there it would take him
8 a while to get in there and I -- there was
9 another door in the bedroom and I could have
10 gone out that door.

11 Q: And I may have misunderstood this, but you were
12 told by your husband that he had bugged the
13 house?

14 A: Yes.

15 Q: Is that the only information you had?

16 A: Other than the fact that he picked up on a
17 conversation that my sister and I had had. And
18 I asked him how he knew, and he said that the
19 house was bugged.

20 Q: Did you believe it was bugged?

21 A: Well, how else would he know about the
22 conversation word for word?

23 Q: Now, did you ever tell Dr. Mobley or Dr. Dodds
24 or any other physician that saw you at Three
25 Rivers that you would take the medication

1 voluntarily if your son said it was okay?

2 A: No. No. I wasn't taking it voluntarily for
3 any reason.

4 Q: And my understanding is you did not want to
5 take it, but when it was apparent to you that
6 they were going to force it on you, you allowed
7 them to inject you?

8 A: They did force it on me.

9 Q: And I'm not trying to mince words. I'm just
10 saying so when they came in to force it on you,
11 you didn't struggle or anything, you --

12 A: Physically I did not. Verbally, I fought back.

13 Q: And you remember -- do you remember at a time
14 after a few days of being admitted to the
15 hospital that you started taking medication
16 orally?

17 A: Do I -- yes, I did start taking it orally. I
18 was -- they force you into those drug lines.
19 And I had to stand in the drug line, and when
20 it became my turn, I had to take my medicine
21 and they would look in my mouth to be sure that
22 it was swallowed and then follow me to my room.
23 And I was getting in the shower like I always
24 did. That was my shower time.

25 Q: If you did not want the medication at all, why

1 did you start taking it orally instead of
2 continuing to make them inject you in your
3 buttocks?

4 A: They did both.

5 Q: Now, I understand that you had it in your
6 buttocks because you didn't want the needles in
7 your arms?

8 A: Yes.

9 Q: And why didn't you want them in your arms?

10 A: I just didn't. There's not as much meat up
11 there. And keep in mind, I'm as large now as
12 I've ever been. I was a two to a four then.

13 Q: Now, I want to make sure I understand. When
14 you were discharged from Three Rivers, you went
15 to live in the Beaufort house in what you call
16 the mother-in-law section?

17 A: Yes.

18 Q: All right. Did you -- when you were
19 discharged, were you able to drive?

20 A: Yes.

21 Q: And did you drive from Beaufort to your job at
22 the Cracker Barrel in Orangeburg?

23 A: Oh, no. I was in Beaufort under my son's legal
24 care, however they phrased it, and he watched
25 me so closely, he would come home several times

1 during the day and check on me. And I knew I
2 could not get to an attorney or a doctor from
3 Beaufort. So I convinced both of them to let
4 me go back to Orangeburg. And I went back to
5 Orangeburg. And I knew that Lewis was not
6 going to sit there with me all day. So he
7 would throw \$20 on the bar for me to go eat.
8 I would -- and check the mileage on the car.
9 So I would take the \$20 and I would run to
10 Columbia and to pay phones, I had a phone card,
11 and try to find doctors. I went for the
12 doctors first. And --

13 Q: So -- I'm sorry. Go ahead.

14 A: Then I had to buy something, anything, as long
15 as I had a sales slip to prove that I was in
16 Columbia shopping. First of all, I didn't have
17 any money, I didn't have any credit cards, I
18 had nothing. And --

19 Q: So you voluntarily took yourself back to
20 Orangeburg --

21 A: Because -- yeah.

22 Q: Because of your son?

23 A: No, I went to Orangeburg so I could get help
24 from a doctor and a lawyer.

25 Q: And at that time, you were living there and

1 going to work at the Cracker Barrel?

2 A: No, Cracker Barrel came at the end of me being
3 drugged because I would have not been able to
4 do it physically at that time.

5 Q: So you were driving from Orangeburg back to
6 your visits at Coastal?

7 A: Yes.

8 Q: And in Orangeburg, you were living back with
9 your husband?

10 A: In my -- by this time he had taken me out of
11 the guest room with the lock on it and moved me
12 back in the master bedroom and he moved to the
13 other room.

14 Q: And I may have misunderstood, I apologize, but
15 the drug that caused you to have the
16 respiration problems was Geodon?

17 A: (Nods head affirmatively.)

18 Q: And your testimony is that after you had that
19 side effect you claim was caused by the Geodon,
20 you never took that drug again?

21 A: They never gave it to me again, as far as I
22 know. I never had a reaction again.

23 Q: And that's the only side effect reaction that
24 you recall from any of the drugs given to you
25 at Three Rivers?

1 A: No, I had the reactions that other people have,
2 the drooling, the inability for motor
3 functions, the -- when you're sitting in the
4 chair you feel like you're sliding. You feel
5 like you're just sliding through that chair and
6 yet you know in your brain you're sitting
7 there. The inability to react, the drooling,
8 but everybody had those. And you say co -- and
9 the shaking. I shook. And the Cogentin,
10 you're going to tell me fixes that. The
11 Cogentin makes you really spacy. So I didn't
12 do that.

13 Q: Now, how did you spend each of your days at
14 Three Rivers? What did you do?

15 A: I tried to come back from the effects of the
16 drugs. I was very quiet, conversation only
17 with patients, very quiet, no fuss. And I
18 tried to get outside in the smoking area even
19 though I do not smoke, never did smoke. I
20 could breathe fresh air. It had cigarette
21 smoke in it, but it was fresh air and sunshine.
22 And every time that door opened, I was out
23 there. They had me cleaning the galley. I did
24 that when I was told to, physically cleaning
25 it. In other words, I made no fuss because I

1 knew what happened when you did make a fuss or
2 any objection. It was more shots, more
3 medicine.

4 Q: Now, you were getting medication daily, right?

5 A: At night, yes, the night line. There was a
6 morning line, but they didn't do that.

7 Q: And were you getting therapy either by
8 counselors or through the psychiatrist each
9 day?

10 A: No.

11 Q: But a doctor was coming by to see you at least
12 each day?

13 A: Dodds came by for a few minutes.

14 Q: But you didn't have any counseling or group
15 sessions or anything?

16 A: No. Well, oh, yes, everybody did, we had
17 group, and --

18 Q: You were able to -- you had your own or shared
19 a room with another woman and had a bathroom,
20 correct?

21 A: Yes.

22 Q: You were able to take a shower every day?

23 A: Yes.

24 Q: Or bath?

25 A: Yes.

1 Q: And you ate three meals a day?

2 A: I did.

3 Q: And did you have free access throughout the

4 floor you were on in the facility?

5 A: Well, no, I mean, we were very limited.

6 Q: Well, I mean, were you kept locked in your

7 room?

8 A: No, unless there was a commotion we went into

9 lock down. We were very limited in the space.

10 The hall and the smoking area and a very small

11 lobby and basically no television. It was

12 very, very monitored. It was hard to get news.

13 I didn't know what was happening.

14 Q: Did you have recreation?

15 A: Yes, we went to the gym. And then we strung

16 beads and colored.

17 Q: So you had like arts and crafts time?

18 A: Like a kid would color a color book. You have

19 no idea.

20 Q: And you said you had a job to clean the galley?

21 A: Yes.

22 Q: Anything else you did during the day that we

23 haven't talked about?

24 A: I was not singled out for that. Other people

25 did.

1 Q: Yes, ma'am. I just wanted to say, you had an
2 assigned job?

3 A: I got an assigned job.

4 Q: Anything else you did during the day for those
5 41 days you were in Three Rivers that you
6 haven't told me about?

7 A: Well, I talked to the patients that were there
8 and the ones that --

9 Q: Anything else?

10 A: Nothing else you could do.

11 Q: Now, why did Dr. Dodds talk to you about
12 assisted living?

13 A: Because that's where she intended to place me
14 when I left Three Rivers.

15 Q: Yes, ma'am. And why, do you understand why she
16 wanted you to go to assisted living?

17 A: Because she didn't want to put me back in a
18 house with Lewis. Evidently I got through.

19 Q: Evidently? I'm sorry?

20 A: Evidently I got the point across to her because
21 she was going to put me in Three Rivers rather
22 than send me back to a house because I was
23 telling everybody that would listen about
24 spousal abuse.

25 Q: And but the agreement was at the end to go live

1 with your son?

2 A: Yes. And I didn't make that. That was all
3 done.

4 Q: Is it your testimony that you had telephone
5 restriction from the time you were admitted to
6 Three Rivers until you left?

7 A: Yes. And I didn't have a phone card anyway.
8 If you don't have a phone card, you don't make
9 a call.

10 Q: Why didn't you have a phone card?

11 A: Where was I going to get one? It cost money.
12 Nobody provided me with that. The phone card
13 is not a Three Rivers phone card. It is a
14 public phone card.

15 Q: And this is for my own information, but you
16 were divorced from Lewis before he died, right?

17 A: Yes.

18 Q: Okay. You can still get his Social Security
19 benefits?

20 A: Oh, yes. He couldn't keep me from it.

21 (Off the Record)

22 Q: And tell me in your own words, in your opinion,
23 what damages you think Dr. Dodds caused you by
24 her actions or inactions?

25 MR. DODSON: Object to the form. You can still

1 answer.

2 A: Number one, she never tested me. She never
3 really listened to me. She had no caring at
4 all for me. All she kept saying is are you
5 going back to Lewis, and I would say no, and
6 then there would be more drugs that night. She
7 kept assigning those drugs to me over and over
8 and over and increasing them. And I didn't
9 need to be there and I certainly did not need
10 to be drugged for one year or the 41 days at
11 all. And she never even questioned it.

12 Q: And after the discharge from Three Rivers, in
13 your opinion, in your own words, tell me what
14 you think Dr. Dodds' actions or inactions have
15 caused you as far as damages since the
16 discharge?

17 MR. DODSON: Object to the form. You can still
18 answer.

19 A: The drugs that she put on me and kept
20 increasing have certainly added to my problems.

21 Q: And those problems being what?

22 A: The effects of the medicine. You want me to
23 list them?

24 Q: If it's what you've already told me --

25 A: No --

1 Q: -- the diarrhea?

2 A: -- it's all -- it's all in -- diarrhea, yeah.

3 Q: I mean, the ones you've already talked about?

4 A: Yes, yes. Plus I don't know where it fits, but
5 there's a stigma against this. They keep --
6 everybody looks at me like oh, she's been in
7 Three Rivers; she's been in a psych ward. She
8 could have prevented that by giving me an exam,
9 a proper exam.

10 Q: Tell me how anyone outside of your family and
11 the court system and Three Rivers would ever
12 know that you were in Three Rivers getting
13 mental health treatment.

14 A: Everybody knew when I got out.

15 Q: Tell me how.

16 A: I don't know.

17 Q: Then how do you know they knew?

18 A: The way they would look at me and move from me
19 and not want to talk to me anymore. And it was
20 just general knowledge. It still is in
21 Beaufort.

22 Q: Well, how would Beaufort know about Three
23 Rivers?

24 A: Well, my son lives there, my sister lives
25 there, my brother lives there.

1 Q: So it's your opinion you think they're telling
2 everyone, or did tell everyone?

3 A: Someone is.

4 Q: And these people that are looking at you moving
5 away and showing coldness to you, did they ever
6 say we know you've been in Three Rivers and had
7 mental health treatment and were diagnosed with
8 a mental illness?

9 A: Nobody ever -- nobody ever says it exactly.
10 I'm trying to think if anybody ever has. I
11 can't recall right now if anybody ever actually
12 said the words, but there's whispering among
13 themselves, finger pointing. It's just
14 different.

15 Q: And who are these people?

16 A: Anybody. Anybody.

17 Q: I don't understand what anybody means.

18 A: Well, anybody that I come in contact with, you
19 know, anybody that -- I'll give you an example.
20 Went to West Marine, husband and I, and I was
21 talking to the owner/manager/man in there,
22 whoever it is. He gave me a -- was very
23 talkative. Gave me a bag that said West Marine
24 on it. Then I saw Lewis having a conversation
25 with him. We went to the Piggly Wiggly which

1 was beside that. He came in there and he
2 ignored me totally. Totally ignored me. How,
3 you know, I assume my husband says, oh, by nice
4 to her, she came out of a mental institution,
5 to have had that complete -- and that's just an
6 example.

7 Q: So when you got out of Three Rivers, you were
8 going out in public doing things with your
9 husband?

10 A: When he dragged me along, yeah.

11 Q: And that's when you moved back to Orangeburg?

12 A: That's when I moved back to Orangeburg, for the
13 purpose of getting help, nothing else.

14 Q: And you've told me everything that, in your
15 opinion, in your own words you think were the
16 damages caused by Dr. Dodds? Anything else you
17 want to tell me?

18 MR. DODSON: Object to the form. You can still
19 answer.

20 A: Well, the effects of the -- no, that's
21 basically it. Being detained for 41 days plus
22 drugged for a year, and she increased the
23 medicine. She was the one that kept increasing
24 it. I didn't answer the question right about
25 Lewis and I'd get more drugs that night.

1 Q: That's all I have. Thanks.

2 **MS. ARGOE - EXAMINATION BY MR. RICHARDSON:**

3 Q: Ms. Argoe, good afternoon. My name is Drew
4 Richardson. I'm here on behalf of Psychiatric
5 Solutions. In your Complaint, you allege that
6 my client is the successor in interest of Three
7 Rivers. It's our position that we -- that our
8 wholly-owned subsidiary, Premier Behavioral
9 Solutions, purchased the stock of Three Rivers
10 after your treatment; do you understand that?

11 A: I knew someone did.

12 **MR. DODSON:** Object to the commentary, but you can
13 still answer.

14 A: I didn't know who did it. Okay. So
15 Psychiatric Solutions is the one that bought
16 Three Rivers?

17 Q: After your treatment; do you understand that?

18 A: Now I find out who it is. I didn't know before
19 who it was.

20 Q: You understand that we purchased the stock and
21 not the assets of Three Rivers?

22 **MR. DODSON:** Object --

23 A: That's a legal question. I don't know.

24 **MR. DODSON:** Yeah, object to the form.

25 Q: I'm asking if you understand that?

1 A: I'm hearing it.

2 Q: Okay. Do you understand what the difference of

3 the two are?

4 A: Yeah.

5 **MR. DODSON:** Object to the form.

6 Q: What is your understanding of the difference of

7 the two are?

8 A: All right. Say that again.

9 Q: Do you understand that it was a stock purchase

10 and not an asset purchase? Do you understand

11 the difference between the two?

12 A: Yes, stock and assets, I do. Stock is

13 tangible, valuable. So stock certificates, a

14 piece of paper. The assets are things like

15 land, what it owns, other than stock.

16 Q: That's your understanding of the difference --

17 A: That's my understanding.

18 Q: -- between the two?

19 A: That's my understanding.

20 Q: Okay. Do you understand that the staff after

21 we purchased Three Rivers that the staff has

22 been employed since then is not the exact same

23 staff as it was whenever you were committed at

24 Three Rivers?

25 **MR. DODSON:** Object to the form.

- 1 A: Well, of course I didn't know that.
- 2 Q: You did not know that until I --
- 3 A: It was the same ones?
- 4 Q: Right.
- 5 A: No, how would I know? I haven't been back.
- 6 Q: Okay. Can you tell me what damages you feel
- 7 like you've suffered as a result of anything
- 8 that Psychiatric Solutions has done?
- 9 **MR. DODSON:** Object to the form, asked and answered.
- 10 You still answer.
- 11 A: Anyone could have stopped this, and if they had
- 12 stopped it initially by testing me properly as
- 13 they should have, I wouldn't have gone on. I
- 14 would never have made it to Three Rivers.
- 15 Q: And you believe that Psychiatric Solutions is
- 16 responsible for that?
- 17 A: Partially.
- 18 Q: Can you explain how you believe that
- 19 Psychiatric Solutions and not other doctors or
- 20 other individuals that were owning Three Rivers
- 21 at the time was responsible as far --
- 22 **MR. DODSON:** Object to the form.
- 23 **MS. ARGOE:** Answer?
- 24 **MR. DODSON:** Yeah, yeah, answer.
- 25 A: Psychiatric Solution had the first -- the first

1 initial look at me. And it's as I just told
2 you, if they had analyzed me correctly, even
3 tested me correctly, it would have been over.
4 Anyone could have done this, and they were the
5 first ones.

6 Q: Okay. I'm a little confused by that because I
7 think the initial treatment that you received
8 was at Aurora; is that not right? In Aiken?

9 A: That's not what we're talking about?

10 Q: No, ma'am. I'm talking about Psychiatric
11 Solutions which stocked the stock --

12 A: Please --

13 Q: -- of Three Rivers.

14 A: Please say Three Rivers.

15 Q: It's not Three Rivers, ma'am.

16 A: I know, but it would certainly help.

17 Q: They're not the same entity.

18 A: Okay.

19 Q: Do you understand that?

20 A: Yeah, I see what you're doing now.

21 Q: Okay. The first treatment that you received
22 was at Aurora; is that correct?

23 A: Yes.

24 Q: Then you went to Three Rivers; is that right?

25 A: Then I went to Three Rivers.

1 Q: After your commitment, your treatment,
2 everything, do you understand that Psychiatric
3 Solutions purchased the stock of Three Rivers
4 after your treatment?

5 A: I hear you.

6 **MR. DODSON:** Object to the form.

7 Q: Do you understand that?

8 A: Yeah.

9 Q: I'm sorry, I haven't been able to understand
10 your response.

11 **MR. DODSON:** Object to the form.

12 A: Yeah.

13 **MR. DODSON:** I mean, just --

14 Q: Do you understand it or not understand it?

15 A: Yes, I understand it.

16 Q: Okay. Thank you. That's all I have.

17 **MS. ARGOE - EXAMINATION BY MR. HICKS:**

18 Q: My name is Chip Hicks. I represent Carolina
19 Care Plan and we have just a few very simple
20 questions for you.

21 A: Okay.

22 Q: The first one is, the insurance policy that you
23 were under at the time of your commitment was
24 provided by Carolina Care Plan; are you aware
25 of that?

- 1 A: Yes.
- 2 Q: Okay. Can you describe for me how you had
- 3 health insurance at that time?
- 4 A: Well, it was through my husband, my ex-husband.
- 5 What do you want to know? It's through my ex-
- 6 husband and Paul Argoe Screens, that's it.
- 7 Q: That's it. Do you happen to know who all was
- 8 covered by the policy that your ex-husband had
- 9 with his business?
- 10 A: No.
- 11 Q: No? Do you know if there were employees
- 12 covered on that policy?
- 13 A: I do not know.
- 14 Q: You don't know. Do you know with Argoe
- 15 Screens, the company at issue, who all worked
- 16 for that company? Can you describe for me who
- 17 the employees were?
- 18 A: About 60 of them. No, I can't.
- 19 Q: Were you related to all of them?
- 20 A: No.
- 21 Q: Okay. Was Mr. Argoe related to all of them?
- 22 A: No.
- 23 Q: So is it safe to say that there were non-family
- 24 members --
- 25 A: Oh, yeah.

1 Q: -- employed by Argoe Screens?

2 A: Yeah.

3 Q: And do you know if they had health insurance as
4 well?

5 A: I do know that if they -- if they paid the
6 premiums through their salaries, they did. If
7 they didn't, they didn't. It was their
8 choice.

9 Q: Fair enough. That's all the questions I've got
10 for you.

11 A: That was easy.

12 Q: That was easy.

13 **MS. ARGOE - RE-EXAMINATION BY MS. GANES:**

14 Q: Wait. Actually, can I ask just in literally 30
15 seconds. Have you had any other cosmetic
16 surgeries other than the face lift that we
17 talked about?

18 A: Oh, cosmetic surgery. Surgery meaning invasive
19 with a knife?

20 Q: Anything cosmetically.

21 A: Yes. I've had Juvederm injections in my face.

22 Q: Do you get the Juvederm now?

23 A: One time. I've only had it one time.

24 Q: Okay. And when did you get that?

25 A: July a year ago. It was my birthday present to

- 1 myself.
- 2 Q: Did your dermatologist that we talked about
- 3 handle that?
- 4 A: No.
- 5 Q: Who did that?
- 6 A: A doctor in Manning.
- 7 Q: Who was it?
- 8 A: Chamberlain, I think. Chamberlain.
- 9 Q: Okay.
- 10 A: I've disclosed that.
- 11 Q: I grew up in Kingstree, so I just kind of know
- 12 the territory over in Manning. Anything else?
- 13 Any other cosmetic procedures?
- 14 A: Not that I -- not that I recall.
- 15 Q: Do you have family or any relatives in
- 16 Lexington County?
- 17 A: Not that I know of.
- 18 Q: Is there any reason that you can think of that
- 19 our jury pool in Lexington County would know
- 20 you? Any contacts or business contacts that
- 21 you frequent
- 22 A: Dr. Quinn's there.
- 23 Q: Okay.
- 24 A: Dewitt's there. That's all I can --
- 25 Q: I think you mentioned that Edenfield, your

1 friend Ms. Edenfield moved there.

2 A: Yes. That's true, she lives there and she has
3 a son in Lexington hospital that's a
4 radiologist at one time. I don't know. There's
5 been no contact, so I don't know if he's still
6 there.

7 Q: What's her husband's name?

8 A: Bill.

9 Q: Bill.

10 A: William Edenfield.

11 Q: And why did you only have the one child? Was
12 it your choice to only have one child, or was
13 there any other reason?

14 A: The -- we were married before law school. The
15 Vietnam War was going on, and Lewis did not
16 have to go in the service. Everybody was
17 getting drafted here and there. And if you
18 stayed in school, you were not drafted, and
19 Kennedy put in a provision that if you have a
20 child, you would not have to go. So naturally,
21 after law school, I was having a child, I can't
22 say against my will exactly, but I can't say
23 that it would have been, if it hadn't been the
24 pressure from him to stay out of the service.
25 He feared the service tremendously.

1 Q: Would you possibly not have had any children at
2 all?
3 A: Oh, I can't answer that.
4 Q: Okay. After -- well, having Buss was George,
5 Jr.'s --
6 A: Yes.
7 Q: -- decision?
8 A: Yes. And I complied.
9 Q: Did you ever after that have a desire to have
10 another child?
11 A: No.
12 Q: How was your relationship with Buss when he was
13 a child; were you close?
14 A: Oh, wonderful. I basically raised him. Lewis
15 wasn't there much.
16 Q: What was your income, your family income
17 generally when you were married?
18 A: Oh, I don't know.
19 Q: And did you receive money from the divorce
20 settlement, other than the mortgage on the
21 business?
22 A: Other than the mortgage?
23 **MR. DODSON:** You want me to answer that?
24 A: Yeah, please.
25 Q: Yeah, if you know.

1 **MR. DODSON:** All right. My understanding of it is
2 that she got an alimony payment of \$4,250 a
3 month for, I believe it's a term of 172 months,
4 and that that payment was irregardless of Mr.
5 Argoe's death. And it is secured by stock of
6 the Argoe Screens, which I think Buss Argoe now
7 owns.

8 Q: And so is Buss paying off that alimony payment;
9 is that what is?

10 A: Somebody is.

11 Q: Okay. I understand. And do you have any kind
12 of electronic means of communication like
13 Twitter or Facebook --

14 A: No.

15 Q: -- or email?

16 A: No.

17 Q: You don't use any accounts like that?

18 A: No, ma'am.

19 Q: Okay. I don't have any more questions. Thank
20 you.

21 **MS. ARGOE - RE-EXAMINATION BY MR. DODSON:**

22 Q: I've got a couple of cleanups here. When you
23 were testifying about the first time you got to
24 Aurora --

25 A: Yes.

1 Q: -- and you met with the person that you said
2 didn't appear to be a doctor the first time you
3 saw them, you --

4 A: Oh, that was not Aurora. That was Mental
5 Health in Orangeburg that did not appear to be.
6 That was -- that's where that was.

7 Q: Okay. You described that he had some
8 photographs that he showed to you.

9 A: He did.

10 Q: Do you know whatever happened to those
11 photographs?

12 A: No, I don't.

13 Q: How many photographs were those?

14 A: That many (indicating).

15 Q: Do you know who took those photographs?

16 A: Well, we left them there, I know that.

17 Q: And you don't know what happened to them?

18 A: No.

19 Q: Do you have any other examples in addition to
20 the one you were talking about where you
21 described where you're at the West Point Marine
22 and you went next door to the Piggly Wiggly?
23 Any other times that you felt like somebody
24 knew --

25 A: Well, I feel sure that Lewis spread it around

1 pretty well because that was part of my
2 punishment for disobeying him was having people
3 know that I had been in a mental institution.
4 He made no bones about it. In other words, I
5 am the poor husband that's looking after this
6 mentally ill woman and I'm such a good guy for
7 doing it. That was what he projected and --

8 Q: Did you ever hear him say those words or
9 something close to it?

10 A: If I was talking to somebody, he would whisper.
11 And I don't know what they were saying, but the
12 demeanor would change after that. I mean, what
13 else would he say?

14 Q: You never heard what he actually said? I mean,
15 you didn't overhear the whisper?

16 MR. DODSON: Objection, asked and answered. Go
17 ahead.

18 A: I don't know. I'll have to think about it.

19 Q: Can you name anybody in particular, other than
20 the one gentleman at the Piggly Wiggly and West
21 Point Marine, of anybody specific that you
22 believe knew that you had been in a mental
23 institution?

24 A: Oh, I'm sure there were a lot of people I --

25 MR. DODSON: Object to the form.

1 Q: And again, and my question is other than the
2 general statement of you're sure that people
3 knew, do you know of anybody in particular?
4 A: Well, first of all, all of Orangeburg knew. I
5 can't get into specifics. It was general
6 knowledge, let me put it that way.
7 Q: Have you complained about that becoming general
8 knowledge to anybody in particular?
9 A: Well, my attorneys, they know I'm not happy
10 about that.
11 Q: Anyone other than your attorneys?
12 A: I don't think I've complained, no.
13 Q: You've testified several times that you wanted
14 to have sufficient testing when you got --
15 A: Yes.
16 Q: -- into the different facilities.
17 A: Yes.
18 Q: In your mind, what would have been a sufficient
19 test?
20 MR. DODSON: Object to the form. Go ahead and
21 answer.
22 A: Something like Dr. Davis did in Atlanta.
23 Q: And that was giving you a questionnaire and
24 talking to you?
25 A: That was on the computer, and I don't know the

1 exact number, but it took a while and there
2 were many questions asked many different ways.

3 Q: That's all the questions I have. Thank you.

4 **MS. ARGOE - RE-EXAMINATION BY MR. DAVIDSON:**

5 Q: Got on. How much do you weigh today?

6 A: A hundred and thirty-seven, maybe forty,
7 depending on what time of the day I get
8 weighed, when I weigh myself.

9 Q: Thank you, ma'am.

10 **MS. ARGOE - RE-EXAMINATION BY MR. RICHARDSON:**

11 Q: I actually have a question I forgot to ask
12 earlier. In preparation for this deposition,
13 I read your deposition transcript from before
14 and it seemed like a consistent theme
15 throughout that deposition testimony that your
16 husband had the police and judges in and around
17 Orangeburg, had control over them. Is that
18 still your opinion today?

19 **MR. DODSON:** Object to the form. Go ahead and
20 answer.

21 A: That's what he said.

22 Q: And you still believe that to be the case
23 today?

24 A: I don't know.

25 Q: Do you still believe that to be the case today?

1 A: I don't know.

2 **MR. DODSON:** Object to the form, asked and answered.

3 Q: You're saying you don't know if you understand
4 that today?

5 A: Oh, I understand what you're asking, but do I
6 know if he had control? I don't know that.

7 Q: Okay. So your opinion has changed from your
8 last testimony from your previous deposition to
9 today?

10 **MR. DODSON:** Object to the form. Go ahead and
11 answer.

12 A: I don't know.

13 Q: That's all I have.

14 **MR. DODSON:** Everybody done? All right. I don't
15 have any questions.

16 **(There being no further questions, the deposition**
17 **concluded at 6:04 p.m.)**

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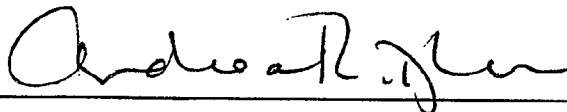
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CERTIFICATE

This is to certify that the deposition of **MARTHA ARGOE**, consisting of Two Hundred Ninety-Two (292) pages, is a true and correct transcript of the testimony given by said deponent after being duly sworn; said deposition was reported by the method of Stenomask with Backup.

I further certify that I am neither employed by nor related to any of the parties in this matter or their counsel; nor do I have any interest, financial or otherwise, in the outcome of same.

IN WITNESS WHEREOF I have hereunto set my hand and seal on May 10, 2012.



Andrea R. Taylor
Court Reporter

Notary Public for South Carolina
My Commission Expires: April 27, 2014

Ret. Mr. James Earl Smith
P.O. Drawer 2789
Orlge. J.C. 2716-2789

D-BK.01037 PG:0189

STATE OF SOUTH CAROLINA) DURABLE POWER OF ATTORNEY
COUNTY OF ORANGEBURG)

KNOW ALL MEN BY THESE PRESENTS that I, Martha Argoe; being desirous of appointing an attorney-in-fact to act for me and on my behalf in all matters pertaining to my care and maintenance. I do hereby revoke any prior Power of Attorney or similar instrument executed by me and appoint my son, George Lewis Argoe, III, as my true and lawful attorney-in-fact for me and in my name and stead to perform the following functions:

1. To allot, assign, buy, care for, collect, contract with respect to, continue any business of mine, convey, convert, endorse, deal with, dispose of, enter into, exchange, hold, improve, incorporate any business of mine, invest, endorse, cash, lease, manage, mortgage, grant and exercise options with respect to, take possession of, pledge, receive, release, repair, sell, sue for and in general, to exercise all the powers in the management of my affairs and estate which any individual could exercise in the management of similar property owned in his own right, upon such terms and conditions as my attorney-in-fact may seem best, and to execute and deliver any and all instruments and to carry and to do any and all acts which my attorney-in-fact may deem proper or necessary to care for me in a manner and to the same degree of comfort to which I have become accustomed to living.

2. To carry out and perform any and all acts, in my place and stead, that I may have performed if I were present, able and not infirm, and I do hereby ratify and confirm all that my said attorney-in-fact shall lawfully do or cause to be done by virtue hereof.

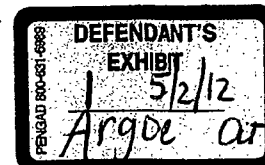
This power of attorney is given in accordance with South Carolina Code of Laws §62-5-501 (1976), as amended, and shall not be effected by the physical disability or mental incompetence of

1

FILED Apr 27, 2004 10:24:22 AM
BOOK 01037
PAGE 0188
INSTRUMENT # 2004001927

FILED
ORANGEBURG
COUNTY
SHELL LANEY
REGISTER OF DEEDS

2116.074 Walsh
00187



ATTEST: TRUE COPY

John L. Smith
REGISTER OF DEEDS
ORANGEBURG COUNTY, SOUTH CAROLINA

1837
0198

D-BK:01037 PG:0190

the principal which renders the principal incapable of managing his own estate.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 26 day of April

2004.

Martha L. Argoe
Martha Argoe

The foregoing instrument, consisting of two (2) typewritten pages, this included was signed, sealed, published, and declared by the said Andrew S. Lepley (notary), as and for a durable power of attorney in the presence of us who at her request and in her presence, and in the presence of each other, have hereunto subscribed our names as witnesses thereto, we and each of us believing the said Martha Argoe to be of sound and disposing mind and memory at the date hereof.

Andrew S. Lepley OF Edgewater, SC
Martha L. Argoe OF Orangeburg, SC

STATE OF SOUTH CAROLINA)
COUNTY OF ORANGEBURG) PROBATE

PERSONALLY appeared before me the undersigned witness, who in oath, says that (s)he saw the within named Martha Argoe, sign, seal and deliver the within written Power of Attorney for the uses and purposes therein mentioned, and that (s)he with the other witnesses whose signature appears above witnessed the execution thereof.

[Signature]
(Witness)

SWORN to before me this 20th
day of April, 2004.

Andrew S. Lepley
Notary Public for South Carolina
My Comm. Expires: 8/02/10

2

2116.074 Walsh
00188

HHN: Read

012-012 0120

April 27, 2005

Martha Daily Behavior

During week

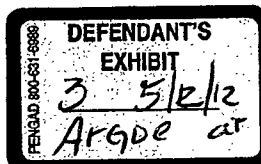
1. No AM observations (asleep).
2. P.M. comes home approximately 6 pm from ?.
3. Watches News tv if Lewis is present but switches to religion tv if Lewis leaves.
4. Will do this until 8 pm (except to go to porch tv on religion) when she will go to dinner, with or without Lewis.
5. After dinner watches religious tv. Stays up after Lewis goes to bed.
6. Sleeps in her room with door locked.
7. Behavior varies.
8. Always (day and night) has tvs tuned to religious programming (3 total- porch den and her bedroom).
9. Only uses cell phone but not inside house (claims house is bugged and taped). Seldom dials and only receives calls, nearly all of which are blocked.
10. Will not ride in auto unless she drives and has control of keys.
11. Always insist on playing gospel tapes and cds when in car. She states it is calming.
12. Does no housework. Won't even discard a paper cup or food wrapper in trash container. States she is retired.
13. Brings no food into house that requires any preparation. Stores no food and will not eat from refrigerator.
14. Has no contact with people except employees at restaurants and beauty shop and nail shop.
15. Takes care of feeding cat and seems to enjoy cat. Does a reasonable job of handing litter box regularly. Sometimes allows it to remain too long.

Martha Weekend

1. Does not change routine except to attend Cornerstone Community Church on Sunday.
2. Will not participate in activities with family.
3. Will watch Lewis work in yard and garage from inside the back door. Seems to want to know what is happening.
4. Has no contact with people, even neighbors, weekdays or weekends.

Traits

1. Never wants to be questioned.



CONFIDENTIAL

7456-A-012

2. Never wants responsibility.
3. Never volunteers.
4. Eating is adequate.
5. Wants good personal appearance in new clothes. Good hygiene.
6. Is insecure.
7. No love for family. Not affectionate.
8. Is suspicious.
9. Shows fear, apprehension, anger to the point of rage when upset.
10. Hostile to Lewis most of the time but wants to be with him at dinner.

CONFIDENTIAL

7456-A-013

Specifics Martha

1. 2003- Started and built house in Beaufort.
2. Late 2003 and early 2004 lost weight size 6 to 2.
3. February 2004 finished house.
4. March 2004 the night before going to Jacksonville to bring the boat back sat up in the middle of the night and accused Lewis of having another family. Said all the money was going for them. First time accusation.
5. Reluctantly, went with Buss and Lewis to Jacksonville for the boat. In Fernandino became horrified of the "bad" people. Said the town was evil and so was all persons there saw a man that looked like or might be Satan. Related that Patty might be pursuing us with evil people.
6. Was upset the rest of the trip back to Beaufort. Prayed a lot.
7. Always thereafter was upset in Beaufort and stared often at the heavens in prayer.
8. Has always accused Lewis of being involved with another family.
9. Son Buss is aware of this accusation, but can't persuade her its not believable and not true.
10. Martha wanted money, and other things from Lewis. Went to Beaufort with him on weekends in 2004 and for July 4 and Water Festival. Insisted she needed 5 bathing suits which Lewis purchased for her rather than make a scene in Belks. Insisted on 2 single beds for the downstairs in Beaufort at a cost of \$7,000.00. Was ugly at the store when it was offered that the beds were too expensive for the use to which beds were needed.
11. Thereafter wanted a \$19,000.00 watch which was identical to the watch she was then wearing. Became angry when Lewis said it was too expensive and that instead the final bills on the house must be paid. She said that was not acceptable and that both must be done. She started heavy spending and had checks returned. These were picked up and paid by Lewis. She charged clothes and jewelry thereafter, very expensive.
12. Martha has been generously given money. Spending continues.
13. In September 2004 she removed all silver, china and a Bose radio from the house. Secreted them. She has since taken other things which she says she is hiding. Some things she denies taking. Included are 2 cameras, one digital, the other 35 mm Canon and about \$700.00 in silver coins. Some things she denied taking were found hidden in the house.
14. She removed a classic corvette automobile and has it hidden somewhere she says.
15. She has called her sister to come for and keep a chest that is a family heirloom.
16. She has removed the window curtains from parts of the house.
17. She has refused to allow anyone in the house to clean and has not used money given at her request specifically for that purpose to have the work done. The house remains dirty.
18. Her private bedroom is not clean and is in total disorder. Nothing appears to have been picked from the floor and elsewhere for a year. Old food, etc is present.
19. Martha dials the land phone and places the phone receiver between the springs and mattress leaving the

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7456-A-014

phone busy for long periods of time.

20. Martha a provided a Cadillac automobile and a gasoline credit car. She has her Discovery Card and as of the beginning of April the balance was reduced to zero by Lewis.

21. Lewis has paid all her bills including taxes and insurance on her property. Lewis has paid everything he knows to be owed on her house in Beaufort and North Myrtle Beach and other properties. She can't even say thank you without being reminded that she should. She declares that she is owed this because she was married for 40 years.

22. See other writings re Martha.

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7456-A-015

LIMEHOUSE & WALSH
ATTORNEYS AT LAW

JAMES F. WALSH, JR.
Attorney at Law, P.A.

C. WALKER LIMEHOUSE (1915-2003)

1436 Amelia Street, NE
Orangeburg, South Carolina 29115
Post Office Box 627
Orangeburg, South Carolina 29116
Telephone: (803) 534-6061
Fax: (803) 534-6082

September 1, 2005

Honorable Pandora Jones
Orangeburg County Probate Judge
P. O. Drawer 9000
Orangeburg, SC 29116

RE: Martha L. Argoe - Case No.: 2005GC3800029

Dear Judge Jones:

A hearing in the above matter requesting the appointment of a conservator and guardian for Martha L. Argoe has been scheduled for September 28, 2005. Mrs. Argoe was involuntarily admitted to the Three Rivers Center in West Columbia, South Carolina and a hearing on this admission was also held in Richland County. At Three Rivers, Mrs. Argoe received psychiatric counseling and was placed upon medication for her condition. She was subsequently released and returned to her family environment and has continued with counseling and prescribed medication. To the surprise of all parties involved, the medication and counseling has resulted in a complete turnaround of Mrs. Argoe's mental state. Therefore, on behalf of the petitioners, I am requesting that the hearing in the matter be continued at the present time. It appears that with counseling and medication Mrs. Argoe's condition will continue to improve resulting in the voluntary dismissal of the matters. However, presently I am requesting that the matters remain open so that we can further monitor her condition.

I will be glad to provide you any information in regard to the above matters.

Yours very truly,

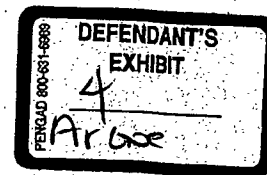
James F. Walsh, Jr.

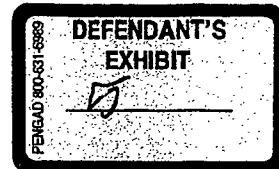
cc: James B. Jackson, Jr.
P.O. Box 2268
Orangeburg, SC 29116
Lewis Argoe
1155 Putter Path
Orangeburg, S.C. 29115

JFW/bjp

C:\My Documents\Probate Docs\Letters\Judge.Argoe.wpd

2116.074 Walsh
00107





Bill date June 19, 2005
Account number 519771549-00001
Invoice number 1089628426

Usage detail 803-378-1154
Martha Argoe

In Your Home Area

Date	Time	Rate	Minutes	Origination*	Phone number	Destination	Usage type	Call type	Airtime charges	Long distance and other charges	Total
1	05/20	05:01P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	\$.00	\$.00
2	05/20	05:02P	P	26	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
3	05/20	11:05P	O	72	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
4	05/21	12:16A	O	1	Orangeburg SC	(800)000-0086 Voice Mail	CL YR		Included	.00	.00
5	05/21	03:12P	O	4	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
6	05/21	03:17P	O	70	Orangeburg SC	(803)378-1154 Incoming	CL MN		Included	.00	.00
7	05/21	10:25P	O	55	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
8	05/22	04:10P	O	68	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
9	05/22	10:41P	O	69	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
10	05/23	07:36A	P	1	Orangeburg SC	(803)378-1154 Incoming	CL A		Included	.00	.00
11	05/23	04:44P	P	45	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
12	05/23	10:43P	O	85	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
13	05/24	12:08A	O	24	Orangeburg SC	(803)378-1154 Incoming	CL MN		Included	.00	.00
14	05/24	03:40P	P	16	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
15	05/24	03:58P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
16	05/24	03:56P	P	3	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
17	05/24	03:59P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
18	05/24	03:59P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
19	05/24	03:59P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
20	05/24	04:02P	P	5	Orangeburg SC	(803)378-1154 Incoming	CL MN		Included	.00	.00
21	05/24	04:08P	P	2	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
22	05/24	04:08P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
23	05/24	04:09P	P	52	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
24	05/25	08:45A	P	3	Saint Matt SC	(864)444-7487 Greenville	SC A	REQ	Included	.00	.00
25	05/25	03:44P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
26	05/25	03:44P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
27	05/25	03:45P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
28	05/25	03:45P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
29	05/25	04:01P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
30	05/25	04:01P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
31	05/25	04:02P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
32	05/25	04:03P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
33	05/25	04:07P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
34	05/25	04:10P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
35	05/25	04:11P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
36	05/25	04:15P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
37	05/25	04:16P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
38	05/25	04:20P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
39	05/25	04:24P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
40	05/25	04:31P	P	67	Orangeburg SC	(803)378-1154 Incoming	CL MN		Included	.00	.00
41	05/25	10:27P	O	91	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
42	05/26	03:39P	P	99	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
43	05/26	10:24P	O	59	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
44	05/27	03:33P	P	59	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
45	05/27	10:21P	O	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
46	05/27	10:22P	O	75	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
47	05/28	04:49P	O	25	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
48	05/28	10:41P	O	99	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
49	05/29	04:18P	O	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00

Order #: 1610E Copy #: 00

Control #: 80010578 00052917

2116.074 Walsh
00239

PLEASE RECYCLE ♻



Bill date June 19, 2005
Account number 519771549-00001
Invoice number 1089628426

Page 6 of 8

Usage detail continued...

In Your Home Area

Date	Time	Rate	Minutes	Origination	Phone number	Destination	Usage type	Call type	Airtime charges	Long distance and other charges	Total
50	05/29 04:19P	O	36	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
51	05/29 10:09P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
52	05/29 10:09P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
53	05/29 10:10P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
54	05/29 10:11P	O	2	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
55	05/29 10:12P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
56	05/29 10:15P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
57	05/29 10:16P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
58	05/29 10:18P	O	50	Orangeburg SC	(803)378-1154	Incoming	CL MN		Included	.00	.00
59	05/30 04:05P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
60	05/30 04:06P	O	24	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
61	05/30 10:52P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
62	05/30 10:53P	O	23	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
63	05/30 11:15P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
64	05/30 11:15P	O	66	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
65	05/31 03:09P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
66	05/31 03:09P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
67	05/31 03:09P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
68	05/31 03:11P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
69	05/31 03:11P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
70	05/31 03:13P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
71	05/31 03:17P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
72	05/31 03:20P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
73	05/31 03:27P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
74	05/31 04:11P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
75	05/31 04:12P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
76	05/31 04:16P	P	57	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
77	05/31 10:25P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
78	05/31 10:25P	O	25	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
79	05/31 10:53P	O	27	Orangeburg SC	(803)378-1154	Incoming	CL MN		Included	.00	.00
80	05/31 11:20P	O	27	Orangeburg SC	(803)378-1154	Incoming	CL MN		Included	.00	.00
81	06/01 04:34P	P	34	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
82	06/01 05:08P	P	52	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
83	06/01 10:41P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
84	06/01 10:41P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
85	06/01 10:42P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
86	06/01 11:00P	O	22	Orangeburg SC	(803)378-1154	Incoming	CL MN		Included	.00	.00
87	06/01 11:23P	O	29	Orangeburg SC	(803)378-1154	Incoming	CL MN		Included	.00	.00
88	06/02 12:59P	P	1	Orangeburg SC	(803)540-1157	Columbia	SC A		Included	.00	.00
89	06/02 03:51P	P	1	Orangeburg SC	(803)540-1157	Columbia	SC A		Included	.00	.00
90	06/02 03:52P	P	4	Orangeburg SC	(800)347-2683	Toll-free	CL A		Included	.00	.00
91	06/02 03:56P	P	97	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
92	06/02 10:29P	O	69	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
93	06/03 04:48P	P	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
94	06/03 04:47P	P	65	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
95	06/04 03:33P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
96	06/04 03:34P	O	12	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
97	06/04 03:46P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
98	06/04 03:46P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
99	06/04 03:50P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00
100	06/04 03:54P	O	1	Orangeburg SC	(903)714-8191	Tyler	TX MN		Included	.00	.00

2116.074 Walsh
00240

Bill date June 19, 2005
Account number 519771549-00001
Invoice number 1089620426

Usage detail continued ...

In Your Home Area

Date	Time	Rate	Minutes	Origination*	Phone number	Destination	Usage type	Call type	Airtime charges	Long distance and other charges	Total
101	06/04	03:55P	O	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
102	06/04	03:56P	O	32	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
103	06/04	04:29P	O	2	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
104	06/04	10:42P	O	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
105	06/04	10:43P	O	74	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
106	06/05	04:06P	O	34	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
107	06/05	04:39P	O	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
108	06/05	04:40P	O	43	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
109	06/05	10:39P	O	79	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
110	06/06	09:47A	P	17	Orangeburg SC	(803)378-1154 Incoming	CL MN		Included	.00	.00
111	06/06	10:04A	P	3	Orangeburg SC	(000)000-0086 Voice Mail	CL AR		Included	.00	.00
112	06/06	04:23P	P	40	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
113	06/06	10:46P	O	103	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
114	06/07	06:02P	P	54	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
115	06/07	08:28P	P	69	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
116	06/08	01:13P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
117	06/08	01:14P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
118	06/08	01:16P	P	2	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
119	06/08	01:17P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
120	06/08	01:18P	P	1	Orangeburg SC	(903)714-8191 Tyler	TX MN		Included	.00	.00
121	06/12	06:07P	O	1	Orangeburg SC	(000)000-0086 Voice Mail	CL YR		Included	.00	.00

*Designates the location, city and state, of the cell tower or switching center which processed the call.

Legends:			
Rate Period	P = Peak	O = Off-Peak	* = Span Rate
Usage Type	A = Price Plan Allowance M = IN-Calling	N = IN-Calling Allowance R = Voice Mail Retrieval	Y = Promotional Allowance
Call Type	REG = Cellular Regional Call		

Verizon Wireless surcharges

Fed Universal Service Charge	\$1.11
Regulatory Charge	.05
Municipal License Surcharge	.47
Subtotal	1.63
Total Verizon Wireless surcharges	\$1.63

Taxes, governmental surcharges and fees

SC State E911 Fee	\$.60
Federal Tax	1.85
SC State Sales Tax	3.08
Orangeburg Cnty Option Tax	.62
Total taxes, governmental surcharges and fees	\$6.15

Total current charges for 803-378-1154 \$67.77

2116.074 Walsh
00241



Coastal Empire CMHC

Administration

1050 Ribaut Road
Beaufort, SC 29902
(843) 524-8899
Fax: (843) 524-8179
Ramon D. Norris, MS.
Executive Director

Allendale County

P.O. Box 514
603 Bamwell Road
Allendale, SC 29810
Clinic: (803) 584-4636
CAF: (803) 584-5008
Fax: (803) 584-5065

Beaufort County

1050 Ribaut Road
Beaufort, SC 29902
Clinic: (843) 524-3378
CAF: (843) 524-2610
PSR: (843) 846-2913
Fax: (843) 524-1879

P.O. Box 23079
151 Dillon Road
Hilton Head, SC 29925
Clinic: (843) 681-4865
Fax: (843) 689-6267

Colleton County

P.O. Box 578
507 Forest Circle
Walterboro, SC 29488
Clinic: (843) 549-1551
PSR: (843) 549-6536
Fax: (843) 549-5637

Hampton County

P.O. Box 1491
65 Forest Drive
Varnville, SC 29944
Clinic: (803) 943-2828
PSR: (803) 943-4361
Fax: (803) 943-4568

Jasper County

P.O. Box 1016
1510 Grays Highway
Ridgeland, SC 29936
Clinic: (843) 726-8030
Fax: (843) 726-8207

July 5, 2006

Judge Pandora Jones-Glover
Probate Court
PO Drawer 9000
Orangeburg, SC 29116

Re: Martha Argoe
Case #: 2005GC38000022
CID: 10096576
DOB:

Dear Judge Jones-Glover,

Ms. Argoe was seen May 19, 2006, in one hour consultation for Dr. Reamy, regarding medication management and family dynamics. Ms. Argoe was hospitalized in June 2005 at Three Rivers Hospital with the diagnosis of Bipolar-manic with psychosis. She denies any other episodes of hospitalization or psychosis in her life. Assuming that her recent hospitalization diagnoses and Dr. Reamy's treating diagnoses are accurate she may be vulnerable to a recurrence at some point in coming months to years whether or not she is prescribed psychiatric medications. On the other hand, a relapse to psychosis is not a foregone conclusion. She did not give permission for me to speak with her husband who accompanied her.

Presently, the patient presents in remission from her disorder, calm, cognitively alert and pleasant. While a formal assessment of her orientation was not performed in this interview, she appears oriented and knowledgeable of the consequences of her acts in regards to her financial matters and other areas of her life. She has been working actually as a hostess in an area restaurant she reports.

In order to avoid intensifying issues of control in this lady's marriage and family I would recommend that a decision to appoint a guardian or conservator involve assessment of her holdings and finances and her management of these by an independent expert, whose assessment would be accepted by both the patient and her family.

It would seem desirable that the patient have as much control over her finances as is reasonable unless her actions indicate she is not acting in her own best interest in the future, and even then to have a guardian appointed only during such periods as she is judged by independent medical/legal/financial experts to be unable to manage her funds.

I hope this assessment will be of assistance to the court as it renders judgments in this delicate matter.

Sincerely,

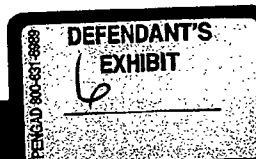
James Elmore, MD
Senior Psychiatrist
SC Lic# 17020

COPY

CONFIDENTIAL

Created on 6/23/2006 4:55 PM

7456-G-211





Coastal Empire CMHC

Administration

1050 Ribaut Road
Beaufort, SC 29902
(843) 524-8899
Fax: (843) 524-8179
Ramon D. Norris, MS.
Executive Director

June 16, 2006

Allendale County

P.O. Box 514
603 Barnwell Road
Allendale, SC 29810
Clinic: (803) 584-4636
CAF: (803) 584-5008
Fax: (803) 584-5065

Orangeburg Mental Health Center
2319 St. Matthews Road
Orangeburg, SC 29118

Beaufort County

1050 Ribaut Road
Beaufort, SC 29902
Clinic: (843) 524-3378
CAF: (843) 524-2610
PSR: (843) 846-2913
Fax: (843) 524-1879

Re: Martha Argoe
CID: 10096576
DOB:
SSN:

P.O. Box 23079

151 Dillon Road
Hilton Head, SC 29925
Clinic: (843) 681-4865
Fax: (843) 689-6267

To Whom It May Concern:

I am writing to inform you that Mrs. Argoe has been receiving services regularly since July 2005.

Colleton County

P.O. Box 578
507 Forest Circle
Walterboro, SC 29488
Clinic: (843) 549-1551
PSR: (843) 549-6536
Fax: (843) 549-5637

If you have anymore questions, please feel free to contact me at 843-524-3378.

Hampton County

P.O. Box 1491
65 Forest Drive
Varnville, SC 29944
Clinic: (803) 943-2828
PSR: (803) 943-4381
Fax: (803) 943-4568

Sincerely,



Julia P. Sechrest
Medical Records

Jasper County

P.O. Box 1018
1510 Grays Highway
Ridgeland, SC 29936
Clinic: (843) 726-8030
Fax: (843) 726-8207

John J. Connery, Acting State Director of Mental Health



Created on 8/8/2005 10:42 AM

CONFIDENTIAL

7456-G-212

South Carolina Department of Mental Health

Neuroleptic (Antipsychotic) Consent Form

Client Name: Martha Argue ID#: 10096576

I understand the neuroleptics (antipsychotics) may be very helpful in treating my clinical condition. Clozaril, Risperdal, Zyprexa, Seroquel and Geodon are neuroleptics. Haldol, Prolixin, and Navane are examples of older neuroleptics.

These medicines can help me think more clearly, feel less aggressive and hostile, and can decrease other psychiatric symptoms. Some of them may help my mood. If I take these medicines regularly, they may keep many of my symptoms from coming back. My prescribing health care provider cannot guarantee how I will respond to any of these medicines:

I have talked with my prescribing health care provider about common side effects seen with these medicines. We have talked about tardive dyskinesia (TD). I understand that TD can cause irreversible movements of my mouth, jaw, tongue, hands, feet, or body. I know it often happens when you take an older medicine for a long time, and that it can occur spontaneously even when someone has never taken these medicines. The newer neuroleptics can cause it too, but much more rarely than the older medicines. Sometimes it shows up after medicine is stopped or decreased. I have been advised by my prescribing health care provider to report any symptoms of TD, or other problems related to taking my medicine, as soon as possible.

My prescribing health care provider and I have talked about different treatments for my symptoms and we believe that neuroleptic medicines may help my illness.

My prescribing health care provider will try to answer any questions I have about these medicines. We will work together if we need to change the dose of my medicine, switch from one medicine to another, or stop my treatment. I will take these medicines as prescribed by my prescribing health care provider for the treatment of my clinical condition.

Martha L. Argue 7/29/05
Client Signature / Date

[Signature] 7/29/05
Prescribing Health Care Provider / Date

Substitute Decision Maker / Date

Witness / Date

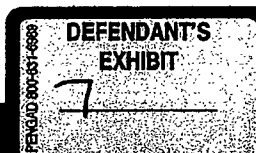
(If the client cannot fully understand this form, a family member, legal guardian, or agent named in a health care power of attorney may be asked to sign as a substitute decision maker following the procedures in SCDMH Directive 772-92. Such procedures also permit the consent process to be completed by telephone when necessary.)

CONFIDENTIAL

7456-G-144

SCDMH FORM AUG-85 (Rev. Oct. 2001) MH-FCT-2
Rev 01-25-2002 DMHF-23-M110.PDF

DATA_File:VA_SouthCarolina_PSA_Protocol_1st090101Trevi010111F-23A1112-0.pdf



CONSENT TO EXAMINATIONS AND TREATMENT

Consent and authority is hereby given to this mental health facility and its professional staff to perform or have performed examinations and/or psychotherapy and/or related mental health treatments and to administer medications when deemed necessary or advisable by appropriate members of the professional staff in consultation with me. This statement has been fully explained to me and I understand it.

explained to me and I understand it.

Julia Beal
Witness
3/22/05

Witness

7/27/05

gate

Martha L. Cague
Signature of Patient

Signature of Patient

Signature of Parent or Legal Guardian

I have been provided a copy of the SCDMH Notice of Privacy Practices and an opportunity to review it and ask questions: 2/1/20

X Martha L. Gagne 7/27/88
Signature Date

Signature

**SIGNIFICANT OTHER PARTICIPANTS INVOLVED
IN THE IDENTIFIED PATIENT'S SERVICES**

I agree to participate in therapy focused on the patient signing above. I understand that any information that I give may be included in the patient's record and disclosed as allowed by law. I also understand that if I want to receive therapy or other treatment services, a separate consent to examination and treatment is required.

Participant/Relationship	Date	Staff Initials
Participant/Relationship	Date	Staff Initials
Participant/Relationship	Date	Staff Initials
Participant/Relationship	Date	Staff Initials
Participant/Relationship	Date	Staff Initials

CONFIDENTIAL

The staff who obtain the other participant signature above enter initials and signature here.

7456-G-145

Staff Initials Staff Signature Staff Initials Staff Signature

Staff Initials

Staff Signature

Staff Initials

Staff Signature

Martha Argoe
Client Name

Client Name

10096576
C104

लगा

CLIENT NAME

Martha L. Argue

CID#

10096576**MEDICARE**

I authorize release of any medical information necessary to process **MEDICARE** claims
for _____ for services provided to them with a starting date of _____

(client's name)

(admission date)

and request payment of benefits to:

Coastal Empire Community Mental Health Center
1050 Ribaut Road
Beaufort, SC 29902

Client's Signature (or authorized person) _____ date _____

WITNESS _____ date _____

MEDICAID

I authorize release of any medical information necessary to process **MEDICAID** claims
for _____ for services provided to them with a starting date of _____

(client's name)

(admission date)

and request payment of benefits to:

Coastal Empire Community Mental Health Center
1050 Ribaut Road
Beaufort, SC 29902

Client's Signature (or authorized person) _____ date _____

WITNESS _____ date _____

CHAMPUS/VA

I authorize release of any medical information necessary to process **CHAMPUS/VA** claims
for _____ for services provided to them with a starting date of _____

(client's name)

(admission date)

and request payment of benefits to:

Coastal Empire Community Mental Health Center
1050 Ribaut Road
Beaufort, SC 29902

Client's Signature (or authorized person) _____ date _____

WITNESS _____ date _____

PRIVATE INSURANCE

I authorize release of any medical information necessary to process **PRIVATE INSURANCE** claims
for Martha L. Argue for services provided to them with a starting date of 7/27/05

(client's name)

(admission date)

and request payment of benefits to:

Coastal Empire Community Mental Health Center
1050 Ribaut Road
Beaufort, SC 29902

Client's Signature (or authorized person) Martha L. Argue 7/27/05 dateWITNESS Brenda Francis 7/27/05 date**CONFIDENTIAL**

Any service not paid by insurance will be billed to you.

M.L.A.
Client Initials

7456-G-146

COVENANT NOT TO SUE OR FURTHER LITIGATE AGAINST ARGOES

STATE OF SOUTH CAROLINA

COUNTY OF LEXINGTON

REFERENCE:

Martha Lewin Argoe v. George Lewis Argoe, III, Individually And As Purported "Trustee", G. Lewis Argoe, Jr., James F. Walsh, Ameriprise Financial Services, Malcolm Lynn Norris and Pandora Jones-Glover (Civil Action No.: 2006-CP-07- 2013) now pending in Beaufort County, South Carolina (*Argoe v Argoe*),

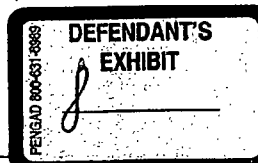
and

Martha Lewin Argoe v. Three Rivers Behavioral Health, LLC and Psychiatric Solutions, Its Successor; Phyllis Bryant-Mobley, MD; Glenn Hooker, MD; Aiken Regional Medical Center, Aurora Pavilion; David A. Steiner, MD; Cheryl C. Dodds, MD; Doris Ann Burrell, RN; Carolina Care Plan; James F. Walsh, Jr.; G. Lewis Argoe, Jr.; and George L. Argoe, III (Civil Action No.: 2007-CP-32-1981) now pending in Lexington County (*Argoe v Three Rivers*):

This Covenant Not to Sue or Further Litigate ("Covenant") as to both of the above matters is entered this 3rd day of October 2007, by and between MARTHA LEWIN ARGOE, on the one hand, and G. LEWIS ARGOE, JR. AND GEORGE L. ARGOE, III, on the other, (cumulatively "Argoes").

KNOW ALL MEN BY THESE PRESENTS that for and in consideration of payment to Martha L. Argoe of One Hundred Thirty Thousand Dollars (\$130,000.00), allocated Sixty-Five Thousand Dollars (\$65,000.00) for the Lexington County Case and Sixty-Five Thousand Dollars (\$65,000.00) for the Beaufort County case, and in further consideration of the other Covenants and valuable Agreements set forth herein below, and no other consideration, the receipt of which is hereby acknowledged, Martha Lewin Argoe, does hereby covenant not to sue or further litigate any claims that she may have

MLA



MLA

against G. Lewis Argoe, Jr. and George Lewis Argoe, III, their heirs, assigns, and administrators (collectively, "Argoes").

As additional valuable and material consideration, and as a further inducement to enter into this Agreement, Argoes warrant, represent and agree as follows:

1. Argoes shall proactively cooperate with Martha Lewin Argoe's counsel and execute any deed and orders necessary in the *Argoe v Argoe* and/or *Argoe v Three Rivers* action with regard to setting aside that certain transaction executed by Argoe, III as Martha Lewin Argoe's Attorney-in-Fact on May 17, 2005 as reflected in Deed recorded in the office of the Register of Deeds for Beaufort County at Book 2150/Pages 797, 798, 799, 800, and 801 so as to return said property, two (2) boat slips, and all contents to Martha Lewin Argoe subject only to the existing mortgage at Lowcountry Bank with a principal balance of \$275,000.00. All property taxes, insurance, regime fees, assessments, and interest ^{that are due} on the same shall be paid in full through the date of transfer. b7c b7d

2. Argoes have withdraw all claims in all courts to the effect that Martha Lewin Argoe is mentally ill or incapacitated or that she requires a guardian *ad Litem*, and will take proactive efforts to retrieve or seal said records.

3. Argoes shall proactively cooperate with counsel for Martha Lewin Argoe to expunge Martha Lewin Argoe's commitment proceeding that took place in June 2005. b7c b7d

4. Argoe, III has removed himself and his personalty from the property located at 100 Factory Creek Road, Beaufort, South Carolina and has left Martha Lewin Argoe's 1964 Corvette automobile and tops and all Haviland china and personal property there. In return, Martha Lewin Argoe shall provide to Argoe, III his bedroom

furniture and memorabilia in his former room at 1155 Putter Path, Orangeburg, South Carolina

5. Argoes shall assure that all payments of interest on the Lowcountry Bank mortgage and insurance are up to date through the date of transfer and that said property was left in good condition.

6. Argoes agree to the issuance of restraining orders in all pending litigation as to personal contact with Martha Lewin Argoe other than when invited in writing by her.

7. Argoes agree not to make any application to any probate court in the future on behalf of Martha Lewin Argoe to act as her fiduciary or in any other capacity, and shall not assist others who may make these efforts.

8. Argoes were deposed on July 25, 2007 and, in those depositions, truthfully testified. Argoes shall truthfully and fully testify if called as witnesses regarding Martha Lewin Argoe's continuation of claims in Beaufort and Lexington Counties against James Walsh, Three Rivers et al, all physicians, Jones-Glover, and all other defendants in pending cases without the need of a subpoena (provided ten (10) days notice is given to their counsel), and shall give sworn testimony, as may be necessary, regarding the events involving the underlying these actions.

IN CONSIDERATION OF THE ABOVE PROMISES, the undersigned also agree that this resolution is the settlement of a disputed claim, and nothing herein may be construed as an admission on the part of Argoe, Jr. or Argoe, III.

The undersigned further declare and represent that no promise or inducement or agreement not herein expressed has been made to the undersigned and that this

MLC

Covenant contains the entire agreement between the parties hereto, and the terms of this Covenant are contractual and not a mere recital.

It is hereby expressly agreed and understood that this instrument is not intended as a release or discharge nor as an accord or satisfaction with any person or entity whomsoever, but only as a Covenant Not to Sue or Further Litigate against Argoe, Jr. and Argoe, III.

This Covenant does not require Martha Lewin Argoe as Plaintiff to dismiss the currently pending actions against any other party, each of which involves a separate and distinct transaction, and shall in no way affect her right to maintain the currently pending actions and pursue recovery from the remaining Defendants in any manner she as Plaintiff may deem appropriate.

This Covenant Not to Sue or Further Litigate is accepted by Martha Lewin Argoe in full compromise and settlement of any and all asserted or unasserted claims; damages, demands, costs, expenses and causes of action, known or unknown, against Argoes in pending actions as to damages alleged to have been suffered by Martha Lewin Argoe based upon the allegations described in her Complaints and amended Complaints in these actions. It being the intent of the undersigned that this Covenant is to cover all past, present and future losses, known or unknown which might occur as a result of the allegations of the Complaints against Argoe, Jr. and Argoe, III, it being Plaintiff's position that the other Defendants caused her additional damages based on the allegations of the Complaints.

MLA
HJ

It is further agreed that this Covenant sets forth the Full and Final Settlement of any and all claims that Martha Lewin Argoe now has or may have in the future against

Argoes with regard to the allegations of the Complaints, as well as any and all claims, damages, demands, costs, expenses, and causes of action for damages, known or unknown, against Argoe, Jr. and Argoe, III although not specifically alleged in the Complaints in *Argoe v Argoe* or *Argoe v Three Rivers*.

It is further expressly understood and agreed that nothing herein contained shall in any way tend to release or discharge or shall in any way be construed as releasing or discharging any persons or any corporations against whom Martha Lewin Argoe has or may have or may assert to have any claim, and Martha Lewin Argoe, in the above capacities, expressly reserves the right to pursue the currently pending actions and all other manners of attempting to recover against all other Defendants named other than Argoe, Jr. and Argoe, III ("Other Parties") in the currently pending actions, and any other person, company or corporation, against whom she as Plaintiff has or may have any claim related to the matters set forth in her Complaints filed in the currently pending actions, and it is specifically and expressly agreed and understood that this Covenant in no way affects or may be construed so as to affect her ability to pursue her claims against Other Parties, and/or to collect on or otherwise execute on any judgment against the Other Parties or otherwise in any manner recover or attempt to recover against the Other Parties and/or any other person, corporation or other entity, whether currently a Defendant or not, with regard to any claims related to or arising out of the matter at issue in the currently pending actions or any other claims that she has or may have or may claim to have against such Other Parties, persons, corporations and/or entities identified hereinabove

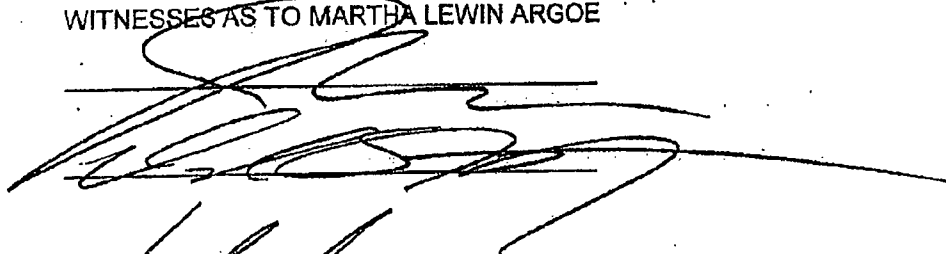
b7c
b7d

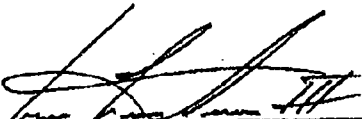
The undersigned state that they have read this Covenant, that they know and understand the content thereof and that there is no agreement other than that expressed herein.

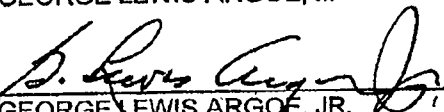
IN WITNESS WHEREOF, the undersigned have hereunto set their hands and seals the date first written above, in the presence of the below-named witnesses.


MARTHA LEWIN ARGOE, Plaintiff

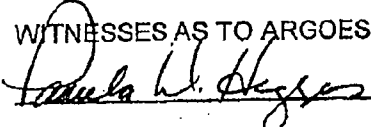
WITNESSES AS TO MARTHA LEWIN ARGOE

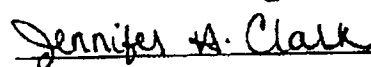



GEORGE LEWIS ARGOE, III


GEORGE LEWIS ARGOE, JR.

WITNESSES AS TO ARGOE





STATE OF SOUTH CAROLINA

COUNTY OF LEXINGTON

Martha Lewin Argoe,

Plaintiff,

vs.

Three Rivers Behavioral Health, LLC and
Psychiatric Solutions, Inc., Its successor;
Phyllis Brant-Mobley, MD; Glenn Hooker,
MD; Aiken Regional Medical Center;
Aurora Pavilion; David A. Steiner, MD;
Cheryl C. Dodds, MD; Doris Ann Burrell,
RN; Carolina Care Plan; James F. Walsh,
Jr.; G. Lewis Argoe, Jr.; and George L.
Argoe, III

Defendants.

IN THE COURT OF COMMON PLEAS

11th JUDICIAL CIRCUIT

Civil Action No.: 07-CP-32-1981

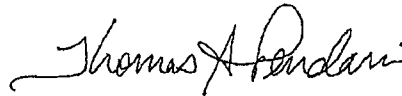
CERTIFICATE OF AUTHENTICITY

I, the undersigned, do hereby verify that the attached documents and/or tangible things
are true, accurate and complete copies of all records and/or tangible things maintained by
Pendarvis Law Offices, P.C. up to and including the date referenced below.

May 28, 2010

Date

BY:



Sign

Thomas A. Pendarvis

Print name

SWORN to and SUBSCRIBED before me
this 28th day of May, 2010

Jennifer A. Clark

(L.S.)

NOTARY PUBLIC for South Carolina

My Commission Expires: 7/8/2015

**SOUTH CAROLINA
CONCEALED WEAPONS PERMIT**

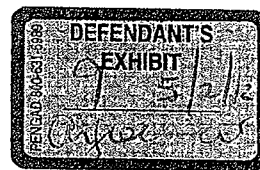
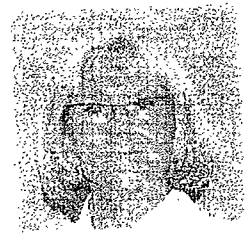
ARGOE, MARTHA L
1415 HILLSIDE DRIVE
NORTH MYRTLE BEACH, SC 29181868

CWP#: 000037609
Expires: 07-06-2013

DOB: [REDACTED] Hgt: 5-03
Issued: 07-27-2009 Wgt: 120
Sex: F

Martha L Argoe

South Carolina
Law Enforcement Division



STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON
IN THE CIRCUIT COURT OF COMMON PLEAS

MARTHA LEWIN ARGOE,

Plaintiff,

vs.

THREE RIVERS BEHAVIORAL
CENTER, LLC, PHYLLIS
BRYANT-MOBLEY, MD, AIKEN
REGIONAL MEDICAL CENTER,
DAVID A. STEINER, MD,
CHERYL C. DODDS, MD. DORIS
ANN BURRELL, RN, AND
CAROLINA CARE PLAN,

Defendants.

CIVIL ACTION

FILE NO.
2007-CP-32-1981

EXHIBITS TO THE DEPOSITION OF
DAVE DAVIS, M.D.

Thursday, May 30, 2013
9:00 a.m.

1776 Peachtree Street, N.W.
Suite 230-S
Atlanta, Georgia

Mona Landry, CCR-B-1514



JPA REPORTING, LLC

CERTIFIED COURT REPORTERS

404-853-1811 1-888-947-2963

March 2013

CURRICULUM VITAE

NAME: Dave McAllister Davis, M.D., D.L.F.A.P.A., F.A.B.F.P., F.A.B.P.N.

WIFE'S NAME: Joan Winfield Barber Davis

OFFICE ADDRESS: Piedmont Psychiatric Clinic
35 Collier Road N.W., Suite M-215
Atlanta, Georgia 30309-1613

Phone: (404) 355-2914 Fax: (404) 355-2917

HOME ADDRESS:

Phone: (404) 262-2250

BORN:
Chattanooga, Tennessee

DATE AND PLACE
PRACTICE BEGAN: July 1, 1969
Atlanta, Georgia

CERTIFICATIONS:

- * Certified in Clinical Psychiatry
American Board of Psychiatry and Neurology
February, 1971 - #11258
- * Certified in Psychiatric Administration and Management
American Psychiatric Association
May, 1976 - #730
- * Certified in Forensic Psychiatry
American Board of Forensic Psychiatry, Inc.
February, 1979 - #15

Certified in Disability Analysis (Senior Analyst)
American Board of Disability Analysts
June 1996 - #2681-96

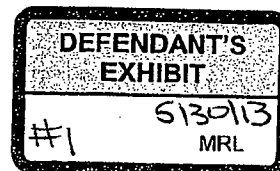
*Dr. Davis was the first psychiatrist in the United States to be certified in these three specialties.

<u>LICENSURES:</u>	North Carolina	June 20, 1963	#13783
	Georgia	October 10, 1969	#12156

EDUCATION:

McCallie Preparatory School Chattanooga, Tennessee	1949-1955	Diploma, Cum Laude
University of North Carolina Chapel Hill, North Carolina	1955-1957	John Motley Morehead Scholar Honors Program
Goettingen University Goettingen, Germany	1957-1958	Goettingen Scholar
University of North Carolina Chapel Hill, North Carolina	A.B. (1960) 1958-1959	German Literature John Motley Morehead Scholar Honors Program
University of North Carolina School of Medicine Chapel Hill, North Carolina	1959-1963	John Motley Morehead Scholar; Doctor of Medicine (M.D.)

Dave M. Davis, M.D.



EDUCATION (CONT'D):

University of Florida Teaching Hospital Gainesville, Florida	1963-1964	Internship in Internal Medicine (PGY-1)
Harvard Medical School Massachusetts General Hospital	1964-1965	Research Fellowship in Psychiatry (PGY-2)
Emory University School of Medicine Department of Psychiatry Atlanta, Georgia	1967-1969	Resident in Psychiatry (PGY-3,4)

FACULTY APPOINTMENTS:

Clinical Assistant Professor of Psychiatry Emory University Atlanta, Georgia	1975-1996	~~CONFIDENTIAL~~
Adjunct Assistant Professor of Psychology Georgia State University Atlanta, Georgia	1975-1980	~~CONFIDENTIAL~~

BOARD EXAMINER:

Clinical Psychiatry, American Board of Psychiatry and Neurology (Associate Examiner)	Numerous years
Administrative Psychiatry (Associate Examiner)	Numerous years
Administrative Psychiatry (Chief Examiner)	1997 - 2002
American Psychiatric Association, Administrative Psychiatry and Management (Examiner in Forensics, Budgeting, Finance, Management, and Organizational Theory)	Numerous years

CLINICAL PSYCHIATRY:

"American's Top Psychiatrist", Consumers' Research Council of America, And Castle Connly 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011.

"America's Top-Rated Physicians," Guide to Top Doctors, 2000-2011.

"America's Top-Rated Physicians," Guide to Top Doctors, 1999.

"Atlanta's Top Doctors," Atlanta Magazine, August 2001.

"Top Doctors in Atlanta Area," Atlanta Magazine, May 1999.

Distinguished Life Fellow Award, American Psychiatric Association, 2003-Present

Best Therapists in the United States, Town & Country Magazine, March 1988.

Board Certified, American Board of Psychiatry and Neurology, Inc., 1971.

Private Practice Adult, Adolescent, Family and Addictive Disease, 1969 - Present.

Founder and President, Piedmont Psychiatric Clinic, Atlanta, Georgia, 1979 - Present.

Clinical Investigator, Lithium Carbonate, 1970.

Clinical Investigator, Cloimpramine, 1988.
Dave M. Davis, M.D.

CLINICAL PSYCHIATRY (CONT'D):

Clinical Investigator, Doral, 1991.

Clinical Investigator, Prosom, 1991.

Clinical Investigator, Paroxetine, 1992.

Practice Guideline Reviewer, APA, "Treatment of Patients with Delirium," 1998.
"Treatment of Patients with Panic Disorder and Related Anxiety Disorders," 1997.
"Treatment of Nicotine Dependence," 1996.
"Psychiatric Evaluation of Adults," 1995.
"Treatment of Depression," 1994.
"Treatment of Eating Disorders," 1993.
"Treatment of Patients with Eating Disorders (Revised)," 1999
"Treatment of Major Depressive Disorder," 1999.
"Treatment of Borderline Personality Disorder," 2000
"Treatment of Eating Disorders (Revised)," 2000
"Treatment of Patients with HIV/AIDS," 2000
"Treatment of Patients with Substance Abuse," 1995.
"Treatment of Patients with Bipolar Disorder," 2001.

Practice Guideline Reviewer, AAPL "Guideline for Forensic Psychiatric Evaluation of Defendants Raising the Insanity Defense"

Cross-Cultural Psychiatry, Minority Caucus, APA, 1985-1995.

Minority Fellowship Mentor, American Psychiatric Association, 1998 to Present

Committee of American Indian, Native Alaskan and Hawaiian Native Psychiatrists, APA, 1987 - 1996.

Editorial Board, Adolescent Psychiatry, 1976 - 1996

Chairman, Piedmont Hospital Clinic Psychiatry Section, 1997-2002

Obsessive-Compulsive Disorder Foundation Referral Network 2000 to current

Editorial Board, Millennium Medical Communications, Inc. 2000-2003

Suboxone (Buprenorphine) Treatment Network 2007 to current

MEDICAL STAFF APPOINTMENTS:

Peachtree & Parkwood Mental Health Center
and Hospital
1999 Cliff Valley Way, N.E.
Atlanta, Georgia 30329

Medical Director, 1969-1980
Active Staff 1969-1980
Courtesy Staff 1981-1985
Consultant, Children's Program, 1975-1990
Director Adult Psychiatric Services 1969-1980
Director, Adolescent Service, 1972-1977
Chief Psychiatrist, Substance Abuse
Program, 1969-1980

Shallowford Community Hospital
4575 Shallowford Road
Chamblee, Georgia 30341

Courtesy Staff
1973-1975

Piedmont Hospital, Inc.
1968 Peachtree Road, NW
Atlanta, Georgia 30309

Courtesy Staff
1972-Present
Pro Health Committee, 1984-2000
Chairman, Physician's Advocacy
Committee, 1993-Present

Dave M. Davis, M.D.

MEDICAL STAFF APPOINTMENTS (CONT'D):

West Paces Ferry Hospital

Chief of Service, Psychiatry, 1995-2003

3200 Howell Mill Road, NW
Atlanta, Georgia 30327

Peachford Hospital
2151 Peachford Road
Chamblee, Georgia 30341

Northside Hospital
1000 Johnson Ferry road
Atlanta, Georgia 30342

Kennestone Hospital
677 Church Street
Marietta, Georgia 30060

Ridgeview Institute
3995 South Cobb Drive
Smyrna, Georgia 30080

Shepherd Hospital
2020 Peachtree Road, NW
Atlanta, Georgia 30309

Active Staff, 1973-1998
Courtesy Staff, 1998 - 1999
Chairman, Alcoholism Committee, 1983
Chairman, Adult Psychiatry, 1989

Courtesy Staff
1975-1982

Courtesy Staff
1977-1992

Courtesy Medical Staff
1981-1993

Courtesy Medical Staff
1981-Present

Consulting Staff
1982-2011

FORENSIC PSYCHIATRY:

Board Certified, American Board of Forensic Psychiatry, 1979.

Examiner in Psychiatric Administration (Forensic Section), American Psychiatric Association, numerous years including 1997, 1998, 1999, 2000, 2001, and 2002.

Criminal, Civil and Probate including:

Cases on murder, rape, arson, burglary, theft, skyjacking, drug trafficking, kidnapping, counterfeiting, fraud, gambling, psychiatric profiles, assault, criminal profiles, paraphilias, bank robbery

Personal injury, medical malpractice, civil commitment, disability, worker's compensation, head injury, product liability, sexual harassment, racial discrimination, sex discrimination, age discrimination

Over 500 homicide cases evaluated

Wills, child custody, psychiatric autopsy, insurance investigation

Jury selection

Over 2000 cases; over 400 appearances as expert witness in court or depositions. Expert witness for U.S. Federal Court; U.S. Federal Defenders Program, Inc.; Superior Courts of Fulton, DeKalb, Bibb, Paulding, Bartow, Floyd, Clarke, Spalding, Muscogee, Chattooga, Forsyth, Dawson, Lumpkin, Fayette, Coweta, Gwinnett, Cobb, Douglas, Clayton, Henry, Carroll, and Cherokee counties of Georgia. Appearances as expert witness in Georgia, Florida, Alabama, Indiana, Tennessee, South Carolina, North Carolina, Virginia, Massachusetts, Louisiana, and Texas

Joint Medical Health Committee of the State Bar and Young Lawyer's Section of Georgia.

Member, Forensic Services Task Force, Georgia Board of Human Resources.

Member, American Academy of Psychiatry and the Law, 1970-Present.

President, American Academy of Psychiatry and the Law, Georgia Chapter, 1985-1988.

Member, American College of Forensic Psychiatry, 1981-1993.

Member, Jonas Robitscher Society.

Dave M. Davis, M.D.

ADMINISTRATIVE PSYCHIATRY:

Former Member, National Forensic Center.

U.S. Secret Service, Southeast Consultant, 1988-1991.

Editorial Board, Psychiatry Malpractice Protector.

Board Certified Administrative Psychiatry and Management, American Psychiatric Association, 1976.

Ethics Committee Memberships; Georgia Psychiatric Physicians Association; American Association of Psychiatric Administrators; Piedmont Hospital; Medical Association of Atlanta.

Medical Director and President, Piedmont Psychiatric Clinic, 1980 - Present

Medical Director and Director of Psychiatric Services, Peachtree-Parkwood Mental Center and Hospital, 1969-1980.

Director, Adult Psychiatry, Peachtree-Parkwood, 1969-1980.

Director, Adolescent Psychiatry, Peachtree-Parkwood, 1972-1977.

Director, Parkwood House (adult halfway house), 1974-1976.

Director, Parkwood Adult Day Hospital 1973-1978.

Director, Parkwood Adolescent Day Hospital, 1975-1978.

Examiner and Associate Examiner in Psychiatric Administration and Management, American Psychiatric Association, numerous years.

Consultation (Administrative) Services Board, American Psychiatric Association, 1981-1990; Chairman, 1987-1990.

Faculty, Administrative Psychiatry Seminars, University of North Carolina School of Medicine.

Docent, Administrative Psychiatry Seminar, Emory University School of Medicine.

Committee on Administrative and Management Psychiatry, and Examiner, APA 1996-2001.

Private Consultation Services:

- Georgia Composite State Board of Medical Examiners, Evaluating Clinician
- Georgia Dental Board, Evaluating Clinician
- Georgia Pharmacy Board, Evaluating Clinician
- American Psychiatric Association, Consultation Service, Chairman
- United States Secret Service
- Tallahassee General Memorial Hospital, Tallahassee, Florida
- Atlanta Police Department
- Atlanta Hawks
- Atlanta Braves
- Atlanta Falcons
- National Football League
- Internal Revenue Service
- State Bar of Georgia
- Georgia Composite State Board of Medical Examiners
- Federal Defender's Office
- Atlanta Falcons Physician for Drug and Alcohol Abuse
- Nix, Mann and Associates (Architects)
- Equifax
- St. Paul Fire and Marine Insurance Company
- Metropolitan Life Insurance Company
- General Motors Corporation
- Trust Company Bank
- FLR Health Resources
- Western Electric

Dave M. Davis, M.D.

ADMINISTRATIVE PSYCHIATRY (CONT'D):

- Blue Cross Blue Shield of Georgia
- Healthcare Services of America, Inc.
- Northside Hospital, Atlanta, Georgia
- Joe Johnson Mental Health Center, Chattanooga, Tennessee
- Long Beach General Hospital, Long Beach, California

Seven Confidential Hospital Consultations
 Maricopa Medical Center, Phoenix, Arizona
 Lloyd Nolan Hospital, Fairfield, Alabama
 St. Joseph's Hospital, Houston, Texas
 West Georgia Medical Center, LaGrange, Georgia
 Memorial Coastview Hospital, Long Island, California
 Larkin General Hospital, Miami, Florida
 Athens Regional Medical Center, Athens, Georgia
 Laurelwood Hospital, Gainesville, Georgia
 Shreveport Medical Center, Shreveport, Louisiana
 Choate-Symmes Health Service, Inc., Woburn, Massachusetts
 Methodist Medical Center of Illinois, Peoria, Illinois
 Maury County Hospital, Columbia, Tennessee
 Mount Vernon Hospital, Alexandria, Virginia
 Humana Hospital Brentwood, Shreveport, Louisiana
 Northwest Regional Medical Center, Gainesville, Georgia
 Cobb General Hospital, Mableton, Georgia
 Montana Deaconess Medical Center, Great Falls, Montana
 St. Joseph's Hospital, Houston, Texas
 Moses H. Cone Medical Hospital, Greensboro, North Carolina
 Polyclinic Medical Center, Harrisburg, Pennsylvania
 Devereaux Center, Kennesaw, Georgia
 Northeast Alabama Regional Medical Center, Anniston, Alabama
 St. Joseph's Hospital, St. Paul, Minnesota
 Self Memorial Hospital, Greenwood, S.C.
 Phoebe Putnam Medical Center, Albany, Georgia
 Mobile Infirmary, Mobile, Alabama
 The Brattleboro Retreat, Brattleboro, Vermont
 Composite State Board of Medical Examiners, Georgia
 Obsessive-Compulsive Foundation Referral Network

ADDICTION PSYCHIATRY:

Psychiatric Director, Chemical Dependency Unit, Parkwood Hospital	1969 - 1980
Chairman, Alcoholism Committee, West Paces Ferry Hospital	1983
Chairman, Alcohol & Drug Committee, Medical Association of Atlanta	1975
Chairman, Physician's Advocacy Committee, Piedmont Hospital	1993 - Present
Member, Physicians Advocacy Committee, Medical Association of Georgia	1988 - 2002
Practice Guideline Reviewer, American Psychiatric Association Treatment of Patients with Substance Use Disorders: Alcohol, Cocaine, Opioids.	1995
Faculty and lecturer, Mercer University Southern School of Pharmacy, "Appropriate Prescribing of Controlled Substances"	1995
Atlanta Falcons Team Physician (Substance Abuse)	1993 - Present
National Football League Area Psychiatrist for Substance Abuse	1993 - Present

Dave M. Davis, M.D. **FOUNDER**

Adolescent Program, Peachtree-Parkwood Hospital - first private adolescent psychiatric unit in the Southeast
 Parkwood School - private school for emotionally disturbed adolescents
 Parkwood House - halfway house for emotionally disturbed adults
 Child Program, Peachtree-Parkwood Hospital - first private psychiatric children's unit in the Southeast

Parkwood Day Hospital -- first psychiatric private day hospital in the Southeast

Georgia Chapter, National Foundation for Sudden Infant Death

Georgia Chapter, American Association of Psychiatric Administrators

Georgia Map Collector's Club

Piedmont Psychiatric Clinic

Georgia Chapter, American Academy of Psychiatry and the Law

MILITARY EXPERIENCE:

1965	Captain, U.S. Army Medical Corps Psychiatrist, U.S. Army Hospital, Fort Jackson, South Carolina
1965	Fitzsimmons Army Hospital, Denver, Colorado
1965-1967	Psychiatrist, 249 th General Hospital, Tokyo, Japan
1967	"Drug Abuse in U.S. Servicemen in Vietnam" (Suppressed by Surgeon General's Office)
1967	Honorable Discharge, Letter of Commendation

PUBLIC HOSPITAL EXPERIENCE:

1963	Staff Psychiatrist, Female Admissions Unit; Director, Female Epilepsy Unit, Dorothea Dix State Mental Hospital, Raleigh, N.C.

HONORS AND AWARDS:

"America's Top Psychiatrists", <u>Consumers' Research Council of America</u>	2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012
"America's Top-Rated Physicians," <u>Guide to Top Doctors</u> (Castle Connolly)	1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012
Best Doctors in Atlanta, <u>Atlanta Magazine</u>	1999, 2000, 2001
Best Therapists in United States, <u>Town and Country Magazine</u>	March 1988
John Motley Morehead Scholar University of North Carolina	1955-1957 1958-1960
Goettingen Scholar, Goettingen University Goettingen, Germany	1957-1958
Phi Eta Sigma (Honorary Scholarship Society)	1956
Delta Phi Alpha (Honorary German Language Society)	1957
Externship, Dorothea Dix State Mental Hospital Raleigh, North Carolina Dave M. Davis, M.D.	March-July 1963

HONORS AND AWARDS (CONT'D):

Toastmaster of the Year, Explorer's Club Atlanta, Georgia	1971
Chairman, Judicial Council (Ethics Committee) Medical Association of Atlanta	1974; 1975
Chairman, Mental Health Committee Medical Association of Atlanta	1975-1989

Certificate of Appreciation Medical Association of Atlanta	1975-1976; 1982		
President, Georgia Psychiatric Association	1976-1977		
Chairman, Local Arrangement, American Psychiatric Institute on Hospital and Community Psychiatry	1976		
Fellow, American Psychiatric Association	1976 - Present		
Physicians Recognition Award, American Medical Association	1974-1976 1976-1979 1979-1980 1980-1982	1982-1985 1985-1988 1988-1991 1991-1994	1994-1997 1997-2000 2000-2003
Member, Ethics Committee, Georgia Psychiatric Association	1985-1990		
Member, Ethics Committee, Piedmont Hospital	1999, 2000		
Distinguished Alumnus, McCallie Preparatory School	1980		
American College of Forensic Psychiatry	1981		
American College of Mental Health Administration	1981		
President, Georgia Chapter, American Association of Psychiatric Administrators	1983-1984 1984-1985		
Minority Caucus, American Psychiatric Association	1985 - Present		
National Minority Mentors Network	1988 - Present		
President, Georgia Chapter, American Academy of Psychiatry and the Law	1985-1988		
President, American Association of Psychiatric Administrators	1986-1987		
Chairman, Metropolitan Foundation for Medical Care, Psychiatry Review Panel	1970-1976 1987-1996		
Medical Association of Metropolitan Atlanta, Committee Chairmanships: Ethics; Communications; Program; Mental Health; Drugs and Alcohol; Membership			
Mental Health Association of Georgia, Treasurer	1985 -1990		
Delegate to Medical Association of Georgia	1978 -1998		
Montague Boyd Award for Outstanding Publication <u>Clinical Skills for Adult Primary Care</u>	1996		
Montague Boyd Award for Outstanding Publication Dave M. Davis, M.D.			
<u>HONORS AND AWARDS (CONT'D):</u>			
"Ethical Issues in Psychiatry"	2000		
Montague Board Award for Outstanding Publication "Come Here's the Map"	2008		
American Psychiatric Association, Practice Guideline Reviewer	1993 - 2001		
Who's Who in the South and Southwest			
Who's Who in Health and Medical Services			

Who's Who in Medicine and Healthcare

Who's Who in American Law

Who's Who in Executives and Business

Who's Who Among Human Service Professionals

Who's Who in Finance and Industry

Who's Who in U.S. Executives

Who's Who in Science and Engineering

Who's Who in America

Who's Who in the World

Strathmore's Who's Who

Certificate of Achievement, National Safety Council, 2001.

McCallie School Alumni Achievement Award – 2000

Life Fellow, American Psychiatric Association - 2001

Distinguished Life Fellow, American Psychiatric Association 2002 – Present

MEMBERSHIP and FORMER MEMBERSHIPS IN PROFESSIONAL AND SCIENTIFIC SOCIETIES:

American Academy of Psychiatry and the Law

American Association of Psychiatric Administrators

American College of Forensic Psychiatry (1981-1993)

American College of Mental Health Administration (1984-1993)

American Medical Association

American Psychiatric Association

American Society of Adolescent Psychiatry (1974-1986)

Atlanta Clinical Society

Atlanta Foundation for Medical Care

Blue Shield of Georgia Atlanta Board of Trustees

Dave M. Davis, M.D.

MEMBERSHIP and FORMER MEMEBERSHIPS IN PROFESSIONAL AND SCIENTIFIC SOCIETIES (CONT'D):

Georgia Foundation for Medical Care

Georgia Psychiatric Physicians Association

Georgia Society for Adolescent Psychiatry

Medical Association of Atlanta

Medical Association of Georgia

Mental Health Association of Metropolitan Atlanta

Mental Health Association of Georgia
National Forensic Center
National Mental Health Association
Southern Medical Association
Southern Psychiatric Association
Board of Advisors, Village of St. Joseph, (1991 – 1998)
Georgians Against Gun Violence
Georgia Sports Shooting Association
Handgun Control, Inc.
Action for Smoking and Health
National Alliance for the Mentally Ill

MISCELLANEOUS CURRENT AND FORMER MEMBERSHIPS IN SOCIAL AND CIVIC ORGANIZATIONS:

Peachtree Racket Club, President (1995-1996)
Board of Trustees, The Atlanta Opera, (1992-2006)
Atlanta Medical Heritage, Life Member
University of North Carolina Chancellor's Club
Hakluyt Society of the John Carter Brown Library
Museum of the Cherokee Indian
Pro-Mozart Society
The Grolier Club of New York City
Philip Lee Phillips Society, The Library of Congress
The De Renne Society, University of Georgia
Board Member, University of Georgia Libraries

Dave M. Davis, M.D.

PUBLICATIONS:

Davis, Dave, M.D.: Editorial Board, Adolescent Psychiatry, (1985-1996).
Davis, Dave, M.D.: Editorial Board, Piedmont Profiles, (1988-Present).
Davis, Dave M., Shipp, Joseph C., and Pattishall, E.G.: "Attitudes of Diabetic Boys and Girls Towards Diabetes." *Diabetes*, 14:106, February 1965.
Davis, Dave M.: "Special Problems of Psychiatric Patients Evacuated from Vietnam to a Back-Up Hospital." *Medical Bulletin, U.S. Army, Republic of Vietnam*, July-August, 1967, pp. 17-20.
Davis, Dave M.: "Treatment of Narcotic Addiction." *Atlanta Medicine*, 46:31, March, 1972.
Davis, Dave M.: "Sports Psychiatry." *Atlanta Medicine*, 47:35, June, 1973.
Davis, Dave M.: "Psychiatry in the Year 2000." *Atlanta Medicine*, 48:31, March, 1974.

Davis, Dave M.: "The Role of Private Psychiatric and Mental Health Programs." Exploring Mental Health Parameters. Page Publishing, Atlanta, 1974.

Davis, Dave M.: "Experiences with 20 Patients Treated with Lithium Carbonate." *Journal, Medical Association of Georgia*, 64:134-135, May, 1975.

Davis, Dave M.: "SIDS: An Opportunity for Primary Prevention." *American Journal of Psychiatry*, 132:6, June, 1975.

Davis, Dave M.: "Use of a Crisis Committee in a Therapeutic Community." *Southern Medical Journal*, 70:1, January, 1977.

Davis, Dave M.: "An Implementation of Therapeutic Community in a Private Mental Health Center." *Disease of the Nervous System*, 38:3, March, 1977, pp. 189-191.

Davis, Dave M.: "Iguassu Falls in the Border of Brazil and Argentina," (cover photograph), *Atlanta Medicine*, 52:12, December, 1978.

Davis, Dave M.: "Emotional Manifestations of Systemic Lupus Erythematosus." *Lupus Erythematosus Foundation, Inc.*, 1978, pp. 52-59 (updated 1988).

Davis, Dave M.: "Physician's Role in Involuntary Admission to Psychiatric Hospitals." *Atlanta Medicine*, 1979.

Davis, Dave M.: "Report of Some of the Effects of Georgia's New Civil Commitment Law on Patients in a Private Psychiatric Hospital." *Journal of the Medical Association of Georgia*, 69:385-386, May, 1980.

Davis, Dave M., Gonzalez, Victor, Piat, James: "Follow-up of Adolescent Psychiatric Inpatients." *Southern Medical Journal*, 79:9, pp. 1215-1218, September 1980.

Davis, Dave M.: "Hospitalization of Adolescents." *Atlanta Medicine*, 56:8, August, 1982.

Davis, Dave M.: "Your Mental Health: New Tests Help Diagnose Depression." *Atlanta Medicine*, 57:8, August, 1983.

Davis, Dave M.: "Adventure, Tranquility and Exploration." *Atlanta Medicine*, 58:8, August 1984.

Davis, Dave M.: "Professional Athletes, Drugs and Self-Esteem." *Atlanta Medicine*, 58:29, December, 1984.

Davis, Dave M.: "Update on the Treatment of Panic Attack in Aberrations of the Mind." *Journal of the Medical Association of Georgia*, 77:11, November, 1988.

Davis, Dave M.: "Depression and New Age Psychiatry." *Insight*, 10:1, March 1989.

Davis, Dave M.: "Depression and New Age Psychiatry." *Insight*, 10:1, March 1989 (Reprinted in Georgia Family Practice and Women's Information and News).

Davis, Dave M.: "Treatment of OCD with Anafranil." Continuing Education Audiotape, Ridgeview Institute, Series #1.

Dave M. Davis, M.D.

PUBLICATIONS (CONT'D):

Davis, Dave M.: "The Secret Disease: New Hope for the Treatment of Obsessive Compulsive Disorder." *Insight*, Vol. XI, No. 1, April 1990.

Davis, Dave M.: "Treatment of Obsessive-Compulsive Disorder." *Atlanta Medicine*, November 1991.

Davis, Dave M.: "Stories of Patients and Guns." *Impact*, August, 1992.

Davis, Dave M.: "Medication Can Make Depression Bearable." *Atlanta Business Chronicle*, January 29, 1993.

Davis, Dave M.: "Why Lawyers Steal Their Client's Money." *Trial Magazine*, 1993

Davis, Dave M.: Letters to the Editor, *APA News*, "Sex with Patients." April 1993

Davis, Dave M.: "Is It Addiction or Poor Coping?" *Atlanta Medicine*, January 1995.

Davis, Dave M.: "The Recognition of Mental Illness." Clinical Skills for Adult Primary Care. Mark E. Silverman and J. Willis Hurst, Editors. Lippincott-Raven 1996.

Davis, Dave M.: "History of Mozart's Name, Amadeus." September 1997.

Davis, Dave M.: Book Review: "Managing for the Future, The 1990's and Beyond." Peter F. Drucker, Journal of American Association of Psychiatric Administrators.

Davis, Dave M.: "Ethical Issues in Psychiatry." Atlanta Medicine, Vol. 74, pp. 11-12, 2000.

Davis, Dave M.: "Administrative Psychiatrist Celebrate Anniversary." Bulletin of the American Association of Psychiatric Administrators, 2001.

Davis, Dave M.: Psychiatrist Administrator, Volume 1, Issue 3, Fall 2001 "Is There An Ethical Way?: Who Should Make Clinical Decisions - Administrators or Psychiatrist Administrators?", 2001

Davis, Dave M.: Psychiatrist Administrator, Volume 2, Issue 2, Spring 2002 "Is There An Ethical Way?: If I Don't Tell Lies, How Can I Last?"

Davis, Dave M.: Psychiatrist Administrator, "Is There An Ethical Way: What Would Cause You to Resign Your Position As a Psychiatrist Administrator?"

Davis, Dave M.: "They Change the Game"; Readers Forum; Psychiatric Times, November 2002

Davis, Dave M.: "Attention Deficit Disorder," Piedmont Profiles; Spring 2004, Volume 14 #2

Davis, Dave M.: "Come, Here's the Map" Atlanta Medicine Volume 79, Issue 2, 2006, reprinted 2007

SCIENTIFIC PRESENTATIONS:

"Special Problems of Professional Athletes," NFL Physician's Association Meeting, 1973.

"Malingering vs. Conversion Syndromes," Dave M. Davis, M.D., Association of Surgeons Southern Railway System, Atlanta, Georgia, April 17, 1973.

"Drug Therapy for Mild to Moderate Depression," Grady Hospital Staff Conference, April 23, 1975.

"Psychiatric Care and the Medicare-Medicaid Administrative and Reimbursement Act," Democratic Platform Committee, Atlanta, Georgia, April 17, 1976.

"Family Therapy: Models and Methods," Dave M. Davis, M.D., State of Georgia, School of Psychologists and Counselors Annual Meeting, Atlanta, Georgia, September, 1976.

"Human Sexuality," - Speaker and symposium moderator, Medical Association of Atlanta Public Forums, Atlanta, Georgia, several presentations, winter, 1977.

Dave M. Davis, M.D.

SCIENTIFIC PRESENTATIONS (CONT'D):

"Effects of Psychiatric Insurance on Overall Health Costs," U.S. Senate Finance Committee, Subcommittee on Health, Washington, D.C., June 10, 1977.

"An Outcome and Follow-Up Study of Adolescent In-Patients," Dave M. Davis, M.D.; Victor Gonzalez, M.D.; Jim Piat, Ph.D.; Southern Psychiatric Association Annual Meeting, Atlanta, Georgia, October 1-3, 1978.

"An Outcome and Follow-Up Study of Adolescent In-Patients," Dave M. Davis, M.D.; Victor Gonzalez, M.D.; Jim Piat, Ph.D.; American Association of Psychiatric Services for Children, Annual Meeting, Atlanta, Georgia, November 8-11, 1978.

"Adjustment of Adolescent In-Patients One Year After Discharge," Dave M. Davis, M.D.; Victor Gonzalez, M.D.; Jim Piat, Ph.D.; Central States Conference of the American Society for Adolescent Psychiatry, Winnipeg, Canada, September 14-16, 1979.

"Predictions of One-Year Post-Hospital Adjustments of Adolescents Diagnosed as Anti-social Personality Disorder," Dave M. Davis, M.D.; Victor Gonzales, M.D.; Jim Piat, Ph.D. Southern Psychiatric Association, Annual Meeting, San Antonio, Texas, October 8-9, 1979.

"Follow-Up of Adolescent Psychiatric In-Patients," Victor Gonzalez, M.D.; Dave M. Davis, M.D.; Jim Piat, Ph.D. Southern Medical Association, Annual Meeting, Las Vegas, Nevada, November 5-7, 1979.

"The Essence of Education: Empathy," Dave M. Davis, M.D., McCallie School Symposium, Chattanooga, Tennessee, January 14, 1980.

"Psychiatry and Alcoholism: Psychiatric Consideration in Etiology and Treatment of Alcoholism," Moderator, Menninger Foundation, March 10-12, 1980.

"One Year Follow-Up of Depressed Adolescents," Victor Gonzalez, M.D.; Dave M. Davis, M.D.; Jim Piat, Ph.D.; American Association of Psychiatric Services for Children, Annual Meeting, Williamsburg, Virginia, May 29-31, 1980.

"The Prediction of Dangerousness," Dave M. Davis, M.D., Bradley Center Symposium, Columbus, Georgia, 1981.

"Helpful Factors in Predicting Dangerousness," Judges-Psychiatrists Mental Health Group, Atlanta, Georgia, 1981.

"What is a Forensic Psychiatrist?" Dave M. Davis, M.D., Criminal Section, Atlanta Bar Association, Atlanta, Georgia, February, 1982.

"Conflict Generating Issues in Hospital Psychiatry: Healing Approaches," American Psychiatric Association Meeting, Los Angeles, California, May 9, 1984.

"The Impact of Legal Liability on Financing of Health Care Services," Symposium: The Financing of Mental Health Services - Public and Private Sector Perspectives, Atlanta, Georgia, May 4, 1984.

"Positive Treatment and Rehabilitation Outcomes for Adolescents," Continuing education seminar of the National Advisory Board for Psychiatric Services and Healthcare Services of America, Inc., HSA Cumberland Hospital, Fayetteville, North Carolina, June 23, 1984.

"Ake vs. Oklahoma: How It Affects Georgia's Courts," Jonas Robitscher Society, March 11, 1986.

"Administrative Psychiatry and Malpractice," Institute on Hospital and Community Psychiatry, San Diego, California, October 27, 1986.

"Six Cases of Child Sexual Abuse," Georgia Chapter, American Academy of Psychiatry and the Law, Atlanta, Georgia, February 14, 1987.

"Professional Liability Issues in Hospital Related Suicides," Georgia Chapter, American Academy of Psychiatry and the Law," February 5, 1988.

"Psychological Meaning of the Holidays," Piedmont Hospital, November 4, 1989.

"Child Sexual Abuse," Criminal and Family Law Section, Atlanta, Bar Association, March 14, 1990.

Dave M. Davis, M.D.

SCIENTIFIC PRESENTATIONS (CONT'D):

"Power Struggles and Conflict Dissolution in General Hospital Psychiatry," Davis, Dave M. and Pepper, Bert, Management of Psychiatric and Substance Abuse Service: Into the 1990's; American Hospital Association Meeting, San Francisco, California, June 1, 1990.

"Psychiatric Profiles," Annual Convention of American Association of Medical Transcriptionists, August 4, 1990, Atlanta, Georgia.

"Risk Management in Psychiatry," MAG Mutual Seminar, Atlanta, Georgia, 1991

"Munchausen's Syndrome and Factitious Disorders" Piedmont Hospital Medical Staff Meeting, March 29, 1991.

"100 Psychiatric Medical Malpractice Cases from the Southeast: One Psychiatrist's Experience," Davis, Dave M., Southern Psychiatric Association, Annual Meeting, October 3, 1991.

"Current Trends in Mental Health Malpractice," Georgia Trial Lawyers Association, Atlanta, Georgia, February 1992.

"How to Perform a Psychiatric Examination on a Criminal Defendant," Criminal Bar, Gwinnett County, Lawrenceville, Georgia, August 20, 1992

"The Mapping of the Southeast," Atlanta Antiques Club, Atlanta, Georgia, October 20, 1992

"Sexual Abuse Cases including Child Enticement, Child Molestation, Statutory Rape and Child Pornography," Georgia Association of Criminal Defense Lawyers, Helen, Georgia, November 7, 1992.

"Undue Familiarity: An Evolving Concept - An Ethical Dilemma," Institute of Continuing Legal Education in Georgia, Atlanta, Georgia, November 13, 1992.

"Treatment of Depression," Augusta Physicians CME, August, Georgia, February 12, 1993.

"The History of Georgia in Maps and Prints," Atlanta Breakfast Club, Ansley Park, March 17, 1993.

"The Forensic Psychiatrist as Expert Witness," Gwinnett Criminal Bar Lawyers Association, Lawrenceville, Georgia, August 20, 1993.

"Psychosocial Medicine," Piedmont Hospital Medical Staff, Atlanta, February 15, 1995.

"Appropriate Prescribing of Controlled Substances," Mercer University Southern School of Pharmacy, April, 1995.

"How to Raise Children," Atlanta Clinical Society, March 17, 1996.

"Management of Drug Abuse Problems," Piedmont Hospital Staff, June 26, 1996.

"How to Raise Your Children to Stay Away from Drugs," Atlanta Falcons, August 22, 1996.

"Personal Injury, Managed Care, and Psychiatric Malpractice Issues," Institute of Continuing Legal Education in Georgia, Atlanta, Georgia, October 4, 1996.

"Litigation and Risk Management in Psychiatric Administration," American Psychiatric Association Annual Meeting, San Diego, CA, May 1997.

"Ethical Issues in Managed Care," American Psychiatric Association Annual Meeting, San Diego, CA, May 1997.

"Certification in Administrative Psychiatry," American Psychiatric Association Annual Meeting, San Diego, CA, May 1997.

"Alcoholism," Nicholas E. Davis Center Lecture, Atlanta, GA, May 22, 1997.

"Managed Care, Legal Issues," American Psychiatric Association Annual Meeting, Toronto, Canada, May 1998.

"Certification in Psychiatric Administration and Management," American Psychiatric Association Annual Meeting, Toronto, Canada, May 1998.

"Evaluating Claims of Psychological Damages," [The Psychiatric Independent Medical Examination], Institute of Continuing Legal Education in Georgia, Premises Liability, Atlanta, Georgia, November 5, 1998.

Dave M. Davis, M.D.

SCIENTIFIC PRESENTATIONS (CONT'D):

"Executive Roles for Psychiatrists in the 21st Century," American Psychiatric Association Annual Meeting, Washington, D.C., May 1999.

"Mapping of the Southeast," Grolier Club of New York City, New York, June 5, 1999 through July 30, 1999.

"Mental Health Professionals and Malpractice," Institute of Continuing Legal Education, Atlanta, Georgia, September 23, 1999.

"Forensic Evaluation of Damages in a Negligent Security Case," Institute for Legal Education, Atlanta, Georgia, November 5, 1999.

"Taking a Proactive Approach to Protecting Your Company and Employees from Workplace Conflict and Violence," Personnel Law Update, 17th Annual Georgia Conference of Council on Education in Management, Atlanta, GA, March 8, 2000.

"Certification in Psychiatric Administration," American Psychiatric Association Annual Meeting, Chicago, IL, May 2000.

"Psychiatric Expert Testimony," Georgia Association of Criminal Defense Lawyers, Atlanta, Georgia, January 20, 2001.

Moderator, Administrative Psychiatry Award Lecture - American Psychiatric Association Annual Meeting, New Orleans, Louisiana, May 9, 2001.

"The Administrative Psychiatry Credential," American Psychiatric Association Annual Meeting, New Orleans, Louisiana, May 9, 2001.

"Politics of Administrative Relationships in Psychiatry." Discussant, American Psychiatric Association Annual Meeting, New Orleans, Louisiana, May 9, 2001.

"Prospering: Market Dynamics in the New Political Crucible," American Psychiatric Association Annual Meeting, New Orleans, Louisiana, May 10, 2001.

"Addictions, Relationship and Healthier Pathways," Canyon Ranch Lecture Series. Tucson, Arizona, May 25, 2001.

"Coping skills and Psychological Development," Canyon Ranch Lecture Series. Tucson, Arizona, May 26, 2001.

"Psychological Development, Childhood to Adulthood, and Better Coping," Buckhead Rotary Club, June 6, 2001.

"Coping with Stress – Work Better, Live Better," National Safety Council Annual Meeting, Atlanta, Georgia, September 25, 2001.

"The Healthy Personality," Canyon Ranch Lecture Series, Tucson, Arizona, April 12, 2002.

"A Coping Skills Hierarchy, Canyon Ranch Lecture Series, Tucson, Arizona, April 13, 2002.

"Proper Use of Anti-depressants," Nicholas, Davies Lecture, Atlanta, Georgia, June 26, 2003.

"Art to Science: America and the Southeast in Early Maps," Exhibit and lecture, William P. Cumming Society and University of North Carolina Special Collections Library, Chapel Hill, N.C., February 15, 2003.

"These Parts are Little Known: Exploration and Discovery in Mapping Georgia, 1493-1921." Atlanta History Center June – July 2004.

"Treatment of Personality Disorders," Piedmont Hospital Medical Staff, February 14, 2008.

"Human Right Abuses Around The World in Mental Health" United Nations. New York, N.Y., December 2008

"A visit to the Rare Book Room." – UGA Libraries, Beyond The Pages, Vol 7, Spring 2008

MEDIA APPEARANCES:

1972	NBC Nightly News: "Valium and Addiction."
1974	Bob Neal Show, WSB-TV: "Treatment of Emotional Illness in Adolescents."
1974	Atlanta Journal, July 24, 1974, "Abortion Clinic Ads are Condemned" by Charles Seabrook.
1974	Atlanta Journal and Constitution, August 4, 1974, "Federal Jury to Get William A. Williams Case Today," by Beau Cutts.

Dave M. Davis, M.D.

MEDIA APPEARANCES (CONT'D):

1974	The Atlanta Constitution, October 31, 1974, "Is Nixon Depression Behind his Illness?" by Foy S. Joyce.
1975	Atlanta Journal, May 6, 1975, "The Killer Probably a Disease [Not a Man]" by Dave M. Davis, M.D.
1975	Atlanta Journal and Constitution Magazine, November 2, 1975, "A Medical View of Neurotics".
1975	Peg Nugent Call-in Show, WRNG: "Treatment of Depression and Prevention of Suicide."
1982	NBC Nightly News (Areolia Bundles): "Projected Profile of a Multiple Child Murderer."
1982	Harmon Wages Sports Show, WAGA-TV: "Major League Baseball and Why Teams Streak."
1982	WAGA-TV News: "Effect of Stress on Police Attitudes."
1983	WSB-Radio: "Gun Control in America."
1983	Dick Buerkle Running Show (4 appearances): "Addiction to Running" "Effects of Stress on Athletic Performance" "Psychological Factors that Affect Athletic Performance" "Anxiety and Performance in Athletic Competition"
1983	"The Season of Deferred Payments: Holiday Syndrome," Atlanta Constitution.
1983	"Compulsive Running Called 'Positive Addiction Gone Wild,'" Atlanta Constitution.
1983	"Did Retirement of Bear Bryant Lead to His Heart Attack?" Atlanta Journal.
1983	"Handguns, More a Danger Than Means of Protection," Atlanta Journal.

- 1984 WSSA-Radio: "Handgun Control in Georgia."
 1984 Atlanta Forum, Brenda Singletary: "Eating Disorders - Anorexia and Bulimia."
 1984 Corey McPherrin Show, WAGA-TV, Eyewitness News Sports: "Effects of Parental Attitudes on Little Leaguers."
 1985 WSB-TV Evening News, Vic Carter: "Relationship of Insanity and Crime to the Full Moon."
 1985 WSB-TV Evening News, Diana Davis, Medical Reporter: "The Survivors Syndrome," (following Delta Airlines crash in Dallas, Texas).
 1985 Georgia Public Television - Health Matters: "Alzheimer's Disease."
 1985 "Let's Control Handguns." Atlanta Constitution.
 1985 "Suicide: Georgia's Newest Growth Industry," Atlanta Constitution.
 1986 "American Indians and Mental Health," Atlanta Constitution.
 1986 Georgia Public Television - A Lifetime: "Teenage Suicide."
 1986 Georgia Public Television - Health Matters: "Pain Control."
 1986 Scott Reynolds Show, WCNN: "Suicide."
 1987 Georgia Public Television - Health Matters: "Teen Suicide."
 1988 WSB-TV Evening News, Diana Davis, Medical Reporter: "Post-traumatic Stress Disorder in Guards Following the Atlanta Prison Riot."
 1988 WSB-TV Evening News, Mark Pickard, Reporter: "Teenage Suicide; Its Causes and Prevention."
 1988 "Is Anybody Listening? Teen Suicide, Special Presentation." WAGA-TV 5, August 2, 1988.
 1988 "Parents Suspected of Killing Their Children," Atlanta Journal & Constitution, October 6, 1988.
 1988 "Holiday Syndrome," WSB-TV 2 Evening News, December, 1988.
 1988 "Between the Lines." "Seasonal Affective Disorder," CNN.
 1989 "Drug Testing of Teenagers by Parents," Channel 11, WXIA TV, January 1989.
 1989 "Power of Addiction," WSB-TV 2, "Health Matters," January 22, 1989.
 1989 "Post-Holiday Blues," WTBS-TV 17, "Between the Lines," 1989.
 1989 "Control of Automatic and Semi-Automatic Weapons," WAGA-TV, January, 1989.
 1989 "Bundy and Pornography," WSB-TV 2, February, 1989.
 1989 "Semi-Automatic Weapons and Mentally Unstable Individuals," WGNX-TV-46, 1989.
 1989 "Postpartum Depression and Psychosis," WSB-TV; WXIA-TV, "Good Morning, Georgia."
 1989 "Duelling Shrinks," Guest Editorial, Georgia Psychiatric Association Newsletter. Fall, 1989.
 1989 "Anneewakee Trials," WSB-TV 2; WAGA-TV 5; WGNX-TV 46; WSB Radio, October 13, 1989.
 1989 "Reaction of Women to Street Crime," WGNX-TV 46, November 5, 1989.

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MEDIA APPEARANCES (CONT'D):

- 1989 "Winter Depression," [Seasonal Affective Disorder] Gwinnett Daily News, March 6, 1989.
 1989 "Seasonal Affective Disorder." Between the Lines, Kea Lillard, reporter, WTBS-TV, February 4, 1989.
 1989 "Drug Treatment Often Helps Relieve Phobias." Health and Fitness and Gwinnett Daily News, August 8, 1989.
 1989 "Personal Ownership of Automatic Weapons in the United States." Atlanta Journal Constitution. March 1989.
 1989 "Reduction in Handguns Would Bring Fewer Murders, Assaults." Atlanta Journal Constitution. March 1989.
 1989 "Drug Helps Obsessive-Compulsive Disorder." Health and Fitness. Gwinnett Daily News, September 4, 1989.
 1989 "The Power of Addiction." Health Matters, WSB-TV. January 22, 1989.
 1989/1990 "Profile of the Bomber of Judge Vance and Robert Robinson." Atlanta Journal and Constitution, December 29, 1989; CBS Nightly News, Dan Rather, December 30, 1989; CNN, Pat Ethridge, reporter, December 30, 1989; WSB-TV 2, Marc Pickard, reporter, December 30, 1989; WAGA-TV 5, Brenda Wood, reporter, December 30, 1989; WGNX-TV 46, Laura Hisner, reporter, December 30, 1989; Alabama Radio Network, Dave Dunwoody, reporter, January 3, 1990; WGST Radio, Julie Allinder, reporter, January 3, 1990; Birmingham Herald, January 3, 1990.
 1989 "Anneewakee Trials," David Corvette, Atlanta Journal Constitution, October 26, 1989.
 1989 "Holiday Depression and Vacations: Vacation is a Gift Rarely Returned," Carol and Dan Thalimer, Gwinnett Daily News, December 17, 1989.
 1989 "A Drug Which Helps Those Who Pull Out Their Hair," Gwinnett Daily News Health Column, Dec. 18, 1989.
 1989 "Profile of a Mail Bomber," Gary Abronson, Atlanta Journal Constitution, December 29, 1989.
 1990 "Ask the Experts," Jim Rich: "New Developments in Psychiatry," January 6, 1990.
 1990 "Psychiatry Today - Ask the Doctor," Jim Rich, Show Host, WSB Radio, January 7, 1990.
 1990 "Update on the Profile of the Bomber of Judge Vance," WGNX-TV 46, Lee Givens, January 1, 1990.
 1990 "Profile of a Mail Bomber," Jimmy Schwartz, New York Times, January 14, 1990.
 1990 "Drug Testing in Teenagers," Bill Jones, WXIA-TV, January 29, 1990.

1990 "Child Sexual Abuse Hard to Diagnose," Atlanta Bar Association Newsletter, April 16, 1990.
 1990 "Gun Control," Laura Heisner, GSNX-TV, April 24, 1990.
 1990 "Ex-Mental Patient Shooting of People at Perimeter Mall," Kimberly Kennedy, WSB-TV Channel 2 Evening News, April 24, 1990.
 1990 "Gun Control and Mentally Ill Persons," 10:00 o'clock News, WGNX Channel 46, April 25, 1990.
 1990 "Mental Patient in Shootings Puzzles Georgia's Officials," The New York Times, Ronald Smothers, April 26, 1990.
 1990 "Teenage Computer Wizards and Thefts," Bob Cox, WGST Radio, April 27, 1990.
 1990 "Release of the Violent Mentally Ill from Psychiatric Hospitals and Use of Guns," Channel 46-TV, WGNX - Atlanta Forum, May 5, 1990.
 1990 "Martha Ann Johnson Murder Trials" (Testimony), Channels 2, 5, 1, Evening News, May 5, 1990.
 1990 "Mother Who Confessed Insists 'I Didn't Hurt My Children'" Jane Hansen, Atlanta Journal Constitution, May 5, 1990.
 1991 "Emotional Preparation for Middle East War," WXIA-TV, Channel 11 Evening News, Patricia Hunt, January 14, 1991.
 1991 "Emotional Reactions to War in the Middle East," WXIA-TV, Channel 11 Evening News, Patricia Knox, January 15, 1991.
 1991 "How to Prepare Yourself and Your Children to Handle the Emotional Impact of Middle East War," WXIA-TV, Channel 9 Evening News, Patricia Knox, January 16, 1991.
 1991 Panel on "War in Middle East" with General Gordon Duequemin and Correspondent, WXIA-TV, Channel 11 Midday News, January 17, 1991.
 1991 "Is this Armageddon?" Patricia Knox, WXIA-TV, Channel 11, Evening News, January 18, 1991.
 1991 Panel with General Gordon Duequemin on "Middle East War Issues," WXIA-TV, Channel 11, January 18, 1991.
 1991 "Middle East War Issues," CNN Radio News, Don Baird, January 18, 1991.
 1991 "Unstable Economy Seen as Factor in Suicide Rise," Carla Murphy, Gwinnett Daily News, January 19, 1991.
 1991 "Effects of Middle East War on Vietnam Veterans," WXIA-TV, Channel 11, Evening News, January 22, 1991.
 1991 Panel on "Middle East War" with Robbi Allan Goodman, Patricia Hunte, Moderator, WXIA-TV, Channel 22, January 22, 1991.
 1991 "Effects of the Threat of Terrorist's Attacks on U.S. Citizens," Jill Becker, WXIA-TV, Channel 11, Evening News, January 23, 1991.
 1991 "Emotional Effects of Middle East War on U.S.," Dave Foulkes, WSB Radio News, January 23, 1991.
 1991 "Is Saddam Hussein a Madman?" Jill Becker, WXIA-TV, Channel 11, Evening News, January 25, 1991.
 1991 "Emotional Effects of Possible Terrorism in the U.S.," Patricia Hunte, WXIA-TV, Channel 11, Evening News, January 25, 1991.

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MEDIA APPEARANCES (CONT'D):

1991 "Emotional Sequellae in Gulf War: Effects on Veterans," Patricia Hunte, WXIA-TV, Channel 11, Evening News, January 29, 1991.
 1991 "Is Saddam Hussein a Madman?" WXIA-TV, Channel 11, Evening News, February 4, 1991.
 1991 "Clayton County Man Shoots Wife After Losing His Job," WXIA-TV, Channel 11, Evening News, February 9, 1991.
 1991 "Psychological Impact of Losing a Job and How to Handle It," Patricia Hunte, WXIA-TV, Channel 11, Evening News, February 12, 1991.
 1991 "Various Effects of Having No Alcohol on U.S. Troops in the Gulf," Patricia Hunte, WXIA-TV, Channel 11, Evening News, February 19, 1991.
 1991 "Jury Finds Man Innocent in 'Clear-Cut' Suicide," Bill Rankin, Atlanta Journal Constitution, February 23, 1991.
 1991 "Emotional Reaction of U.S. Troops to Peace," Patricia Hunte, WXIA-TV, Channel 11, Evening News, February 26, 1991.
 1991 "The Criminal Mind in All of Us," Eric Taylor, WSB-Radio, March 7, 1991.
 1991 "Problems of Returning U.S. Service People After the War," Patricia Hunte, WXIA-TV, Channel 11, Evening News, March 7, 1991.
 1991 "Emotional Reaction of Children Whose Parents are Returning from the Gulf War," Patricia Hunte, WXIA-TV, Channel 11, Evening News, March 11, 1991.
 1991 "Munchausen's Syndrome by Proxy," Donna Lowrey, WXIA-TV, Channel 11, Evening News, March 21, 1991.
 1991 "Munchausen's Syndrome," Eric Taylor, WSB-Radio, March 26, 1991.
 1991 "Suicidality in Gay and Lesbian Homosexuals," Bob Cox, WSB Radio, May 31, 1991.
 1991 "Suicide Casts Pall on County," Atlanta Journal Constitution, Gwinnett Extra, Rob Johnson, June 22, 1991.
 1991 "Electronic Mail: Avoiding Communication," Patricia Hunte, WXIA-TV Channel 11, Evening News, June 26, 1991.
 1991 "Effects of Extended Rainy Weather on Mood," Patricia Hunte, WXIA-TV Channel 11 News, June 28, 1991.
 1991 "Seasonal Affective Disorder," Atlanta Journal Constitution, Kim Bondy, June 28, 1991.
 1991 "Serial Killer in Wisconsin," Dave Folkes, WSB News Radio, July 23, 1991.

1992 "Depression: Treatment Update," WSB-TV Medical Update, February, 1992.
 1992 "Violence in Atlanta Related to Rodney King," WGNX-TV 46, Richard Cook, April 30, 1992.
 1992 "Death by Handgun," WGNX-TV 46, Evening News, June 28, 1992.
 1992 "Child Abuse," WSB-TV News, Diana Davis, August 3, 1992.
 1992 "Dreams," WSB-TV Evening News, Dianna Davis, August 4, 1992.
 1992 "Child Abuse: The Hendricks Case," WXIA-TV, Channel 11 Evening News, John Shirels, August 7, 1992.
 1992 "Porn Flicks," WXIA-TV, Channel 11 Evening News, Bob Sokola, September 3, 1992.
 1992 "Mental Effects of Braves World Series Loss," WGNX-TV 46 Evening News, Lee Greenwood, October 26, 1992.
 1992 "The Meaning of Halloween and Its Effects on Children," WSB Radio, Bob Cox, October 27, 1992.
 1992 "Profile of a Serial Killer," WIBK Radio, Knoxville, Tennessee, Dave Folkes, October 28, 1992.
 1992 "Halloween and Its Effects on Adults," WSB Radio, October 29, 1992.
 1992 "Nursing Homes and Suicide," Wall Street Journal, Mike McCartney, November, 1992.
 1992 "Effect on Children of Seeing Their Mother Killed," Lou Ann Sedano, WGNX-TV, Channel 46, November 30, 1992.
 1992 "Murder-Suicide," Tracy Green, WXIA-TV, Evening News, December 2, 1992
 1992 "Christmas Depression in Children," Jill Becker, Noonday WXIA TV, December 28, 1992.
 1992 "Holiday Depression and Seasonal Affective Disorder," Kay Flowers, Evening News, WXIA-TV, December 28, 1992
 1992 "The Danger in Not Making New Year's Resolutions," WSB Radio News, Scott Slade, December 31, 1992.
 1993 "Waco Texas Cult Behavior," Channel 11 News at Noonday, March 2, 1993
 1993 "Psychological Effects of Gun Control," Peach State Radio, Susan Capoloto, March 19, 1993
 1993 "Manic-depressive Illness," Kay Flowers, Channel WKIA-TV, Medical News Report, April 22, 1993
 1993 "Effects of a State Lottery on Gamblers and Fanatics," Evening News, Karen Greer, WGNX-TV, April, 1993
 1993 "Suicide," Wall Street Journal, Mike McCarthy, 1993
 1993 "Grief Process in Children - Do Hospices Help? Video - Amanda Brown, Olmstead, Producer, 1993
 1993 "Psychiatric Trauma of Witnessing Murder," WXIA-TV Evening News, June, 1993
 1993 "Violence," WXIA-TV Evening News, Sue Yanello, June 17, 1993
 1993 Tokars Murder Case," Evening News, WAGA-TV, WSB-TV, WXIA-TV, July 13, 1993
 1993 "Tokars Murder Case and Trial," WXIA-TV Evening News, August 28, 1993
 1993 "Violence Erupts in South Florida," Bob Cox, WSB News Radio, September 15, 1993
 1993 "The Adolescent Death Penalty," Evening News, WGNX-TV, December 8, 1993

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MEDIA APPEARANCES (CONTINUED):

1993 "Psychological Effects of Registering Guns and Licensing Gun Owners," Evening News, WGNX-TV, December 9, 1993
 1993 "Holiday Depression," Evening News, WSB-TV, Dianna Davis, December 16, 1993
 1994 "Psychology of Attacks on Professional Athletes," WSB Radio, January 10, 1994.
 1994 "Ira Jackson Talks to Psychiatrist after Angry Tirade," Atlanta Journal-Constitution, January 14, 1994.
 1994 "Transcripts detail Jackson Behavior," Atlanta Journal Constitution, January 24, 1994.
 1994 "Ira Jackson Trial," WSB Channel 2 News, January 24, 1994.
 1994 "Psychiatric Evaluation of Airport Commissioner Jackson," Channel 11 News at 6:00, January 26, 1994.
 1994 "Treatment Success in NGRI Pleaders," Steve Takin - Press Enterprises, Riverside, CA, February 1, 1994.
 1994 "Teenage Crime," Jana Fite, WIBX, Knoxville, TN, February 17, 1994.
 1994 "Courtroom Drama," Martha Sharon, Channel 11 News, March 3, 1994.
 1994 "Treatment of Sexual Impulse Disorders," Lynn Harrison, Channel 2, Evening News, April 28, 1994.
 1994 "Teenagers Who Lash Out Violently," Ken McCloud, Channel 5 News, April 15, 1994.
 1994 "Prozac and Crime," Diana Davis, Channel 2 News, May 13, 1994.
 1994 "Kevin and the Greek," Jim Martin, WGUN Sports America, June 21, 1994.
 1994 "O.J. Simpson and Psychiatry," Mr. Schwann, FM100 Atlanta, June 28, 1994.
 1994 "Reaction of Crowds to O.J. Simpson at Trial," Kevin Rowson, Channel 11 Evening News, July 1, 1994.
 1994 "Reactions of Children to Flood Disasters in South Georgia," Diana Davis, Channel 2 Evening News, July 17, 1994.
 1994 "Weather and Mood," David Chandley, Channel 2 News, July 21, 1994.
 1994 "Spousal Abuse," Keith Whitley, Channel 11 News, August 30, 1994.
 1994 "Fear of Flying and Relationship to U.S. Air Crash," Channel 46 News, September 26, 1994.
 1994 "Prozac as Murder Defense," Diana Davis, Channel 2 Evening News, September 26, 1994.
 1994 "Wife, Doctors, Say Simpson was Competent," Greenville News, October 4, 1994.
 1994 "Marriage and Infidelity," Channel 46 Evening News, October 7, 1994.
 1994 "Profile of a Serial Killer in Atlanta," Doug Rink, Channel 2 News, October 11, 1994.
 1994 "Profile of Serial Killer," WSB Radio, October 20, 1994
 1994 "Profile of Serial Killer," Kathy Scruggs, Atlanta Journal Constitution, October 21, 1994.

1994 "Profile of a Serial Killer of Prostitutes," Channel 46 Evening News, October 26, 1994.
 1994 "Reagan and Alzheimer's Disease," Bob Cox, WSB Radio, November 4, 1994.
 1994 "Susan Smith and Infanticide," WSB Evening News, November 8, 1994.
 1994 "Infanticide," Nina Jimenez, Channel 11 News, November 9, 1994.
 1994 "Three Strikes Crime Bill," Kerry Browning, WSB Radio, November 15, 1994.
 1994 "Profile of a Kidnapper and Child Sexual Abuse," Pat Crosby, Channel 2 News, November 18, 1994.
 1994 "White House Shooting," Channel 11 News, Keith Whitney, December 20, 1994.

1995 "Profile of a Serial Killer," Atlanta Constitution, Jingle Davis, January 6, 1995.
 1995 "Prozac and 'Scarlett O'Hara' Shooting," Channel 5 Evening News, January 24, 1995.
 1995 "Desecration of Churches in Cobb County," Kevin Rowson, Channel 11 Evening News, February 20, 1995.
 1995 "Satanic Destruction of Churches?" Scott Slade, WSB Radio, February 21, 1995.
 1995 Piedmont Profiles: "Making Rounds" - Panic Disorder - Spring 1995.
 1995 "Hit Man's Remorse: Tokars' Murder Trial," WSB Channel 2 Evening News, March 2, 1995.
 1995 "Medicaid Fraud in Child Psychiatry," Lynn Harrison, WSB Channel 2 Evening News, March 3, 1995.
 1995 "Adolescents Who Kill Their Parents," Karen Greer, Channel 46 News, March 6, 1995.
 1995 "Shootings on Expressways," Kevin Rowson, WXIA TV Channel 11, March 16, 1995.
 1995 "Obsessive-Compulsive Disorder in Athletes," Dr. Randy Martin, Channel 2 WSB TV, March 24, 1995.
 1995 "Groupies of Serial Killers," Bob Cox, WSB Radio News, March 29, 1995.
 1995 "Marijuana Usage and Effects," WXIA Channel 5 Evening News, March 31, 1995.
 1995 "People Who Kill Their Parents," Steve Gasque, WSB TV Channel 2, April 27, 1995.
 1995 "Unresolved Grief After Oklahoma City Federal Building Bombing," Kevin Rowson, WXIA TV Channel 11 Evening News, May 4, 1995.
 1995 "How to Determine Insanity in a Criminal Trial," Laura Newborn, WXIA TV Channel 11 News, July 11, 1995.
 1995 "Susan Smith Trial," WXIA Evening News, July 13, 1995.
 1995 "Mothers Who Abuse Their Children," Channel 11 WXIA TV Eleven O'clock News, July 20, 1995.
 1995 "Violence in Automobiles," KTAR, Phoenix, Arizona, Bruce Kirk, August 24, 1995.
 1995 "How to Find a Good Psychiatrist," Channel 11 News, Angela Robinson, September 9, 1995.
 1995 "Obsessive-Compulsive Disorder," Channel 11 News, September 25, 1995.
 1995 "The O.J. Simpson Jury," Channel 11 News, Keith Whitley, September 26, 1995.
 1995 "Anger and Psychosomatic Illness," Diana Davis, Channel 2 News WSB TV, October, 1995.

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MEDIA APPEARANCES (CONTINUED):

1995 "Jury Interaction in the O.J. Simpson Trial," Channel 11 News, October 1, 1995.
 1995 "Depression: The Disease," Channel 11 News, October 2, 1995.
 1995 "O.J. Simpson Trial," WSB Radio, October 2, 1995.
 1995 "O.J. Simpson Verdict," Channel 11 News, Keith Whitley, October 3, 1995.
 1995 "Panic Attacks," Channel 11 News, October 9, 1995.
 1995 "Compulsive Buying," Channel 11 News, October 16, 1995.
 1995 "Attention Deficit Disorder," Channel 11 News, October 23, 1995.
 1995 "Psychological Impact of Braves World Series Win," Channel 11 News, October 30, 1995.
 1995 "Seasonal Affective Disorder," Channel 11 News, October 30, 1995.
 1995 "Trichotillomania," Channel 11 News, November 13, 1995.
 1995 "Holiday Syndrome," Channel 11 News, November 20, 1995.
 1995 "Relieving Stress," Channel 11 News, November 27, 1995.
 1995 "Jealousy," Channel 11 News, December 4, 1995.
 1995 "How to Defeat Self-Defeating Behavior," Channel 11 News, December 11, 1995.
 1995 "Profile of Murder-Suicide Perpetrators," Channel 11 News, December 13, 1995.
 1995 "Murder-Suicide," Channel 2 News WSB TV, Tony Dorsey, December 14, 1995.
 1995 "Holiday Alcoholism," Channel 11 News, December 18, 1995.

1995 "Recommendations for Families with Relatives in Personal Care Homes," Channel 11 News, December 26, 1995.
 1995 "New Years Resolutions," Channel 11 News, December 28, 1995.
 1995 "Munchausen's Syndrome by Proxy," Nina Jimenez, Channel 11 Evening News, December 29, 1995.

1996 "Post Holiday Depression," WXIA-TV Evening News, January 4, 1996.
 1996 "How to Appreciate What You've Got," WXIA-TV Evening News, Angela Robinson, January 9, 1996.
 1996 "Cabin Fever," WXIA-TV News, January 12, 1996.
 1996 "Day Dreams Can Tell You A Lot About Yourself," WXIA-TV Evening News, January 15, 1996.
 1996 "Dreams and How They Work," WXIA-TV Evening News, January 22, 1996.
 1996 "Manic Depressive Illness," WXIA-TV Evening News, January 29, 1996.
 1996 "Profile of the Unabomber," WXIA-TV Evening News, April 2, 1996.
 1996 "Valujet Crash and Grief," WSB News, Diana Davis, May 13, 1996.

- 1996 "Grief and Valuejet Crash," WXIA-TV News, Dennis Doda, June 6, 1996.
 1996 "Profile of Olympic Centennial Park Bomber," WSB Radio News, Scott Slade, July 26, 1996.
 1996 "Effects of Olympic Park Bombing," Channel 46 TV News, July 28, 1996.
 1996 "Profile of Olympic Park Bomber," WSB-TV News, July 28, 1996.
 1996 "Profile of Serial Kidnapper," WSB-TV News, Mary Ellen Brooks, August 20, 1996.
 1996 "Profile of a Serial Kidnapper," Channel 5-TV Evening News, August 22, 1996.
 1996 "Profile of a Serial Kidnapper," WXIA-TV News, Kevin Rawson, August 22, 1996.
 1996 "Larry Lonchar Death Sentence," WXIA-TV News, Kevin Rawson, September 12, 1996.
 1996 "Lonchar Appeals In Death Sentence," WSB Radio, Scott Slade, September 13, 1996.
 1996 "Why Stay In An Abusive Situation?" WXIA-TV Evening News, Cynthia Tinsley, October 15, 1996.
 1996 "Falcons Blues," Channel 5-TV News, November, 1996.
 1996 "Holidays Syndrome Solutions," WSB-TV News, Diana Davis, November 26, 1996
 1996 "Holiday Syndrome," WXIA-TV News, December 5, 1996.
 1996 "Blended Families," AM Radio 1160 San Antonio, TX, December, 1996.
- 1997 "Mother-Son Conflict and Effects on Personality," Evie Adler, Kansas City Star, January 10, 1997.
 1997 "New Pharmacologic Treatments in Psychiatry," WXIA-TV, Kay Flowers, January, 1997.
 1997 "Why Men Cheat," Channel 11, WXIA-TV News, January 9, 1997.
 1997 "Abortion Clinic Bombings and Post Traumatic Stress," Scott Slade, WSB-Radio, January 16, 1997.
 1997 "Rapist Profile," Shaunya Chavis, WSB-TV Evening News, February 20, 1997.
 1997 "Serial Bomber," Scott Slade, WSB Radio, February 25, 1997.
 1997 "Pedicide," Beth Galvin, Channel 5 TV News, April 3, 1997.
 1997 "Binet Trial Evidence," Doug Herrod, WGNX-TV News, April 13, 1997.
 1997 "Prisoner Guilty in Guard's Death," Atlanta Journal Constitution, April 13, 1997.
 1997 "Highway Violence," Tom Reagan, WSB-TV Evening News, April 26, 1997.
 1997 "Why People Join Cults," Barbara Gautier, WXLA-TV News, April 27, 1997
 1997 "Jon Binet Trial," Susan Crowe, CNN, May 29, 1997.
 1997 "Husbands Who Kidnap Their Wives," Beth Galvin, Channel 5 TV News, June 1, 1997.
 1997 "Women and Children's Reaction to Concert," USA Today, July 30, 1997.
 1997 "Importance of Touch in Children," Denise Mann, Medical Tribune, September, 1997.

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MEDIA APPEARANCES (CONT'D):

- 1997 "Athletes Who Turn to Violent Sports," Medical Herald, September, 1997.
 1997 "Advances in Mental Illness Treatment," Diana Davis, WSB-TV News, October 1, 1997.
 1997 "Random Violence," Joyce Oscar, WXIA-TV, November 11, 1997.
 1997 "Holiday Syndrome," Kay Flowers, WXIA-TV News, December 8, 1997.
 1997 "Differences Between Men and Women in Caring for Ill Spouses," Linda Carroll, MSNBC, December 15, 1997.
- 1998 "The Unabomber Trial," CNN News, January 14, 1998.
 1998 "Teenager Murders in Kentucky and Mississippi Schools," CNN News, January 14, 1998.
 1998 "Changes in Sexual Mores - The Clinton-Lewinsky Scandal," Greg Zachary, The Wall Street Journal, January 29, 1998.
 1998 "Bombing of Abortion Clinic in Birmingham," Sandra Parish, WSB-Radio, January 29, 1998.
 1998 "Adolescent School Shooting in Arkansas," Chris Wolfe, WSB-TV, March 25, 1998.
 1998 "Adolescent Homicide in Arkansas," Betty Harrison, Atlanta Journal, March 25, 1998.
 1998 "Shootings in Arkansas," Paul Crowley, WXIA-TV News, March 25, 1998.
 1998 "Capitol Shooting," NBC Nightly News with Dan Rather, Joan Roberts and Trudy Baker, July 27, 1998.
 1998 "Capitol Shooting," CBS News with Susan Shiller and Tom Cosgrove, July 27, 1998.
 1998 "Capitol Shooting," CNN Talk Back with Susan Deutchmann, July 27, 1998.
 1998 "Paranoid Schizophrenia," ABC.com, Claudine Chamberlain, July 27, 1998.
 1998 "What is Paranoid Schizophrenia?" Cox Broadcasting, Dayton, Ohio and Todd Riffner for WBDO-Orlando, Florida, July 28, 1998.
 1998 "Schizophrenia and Violence," Psychology Today, Leslie Vreeland, July 28, 1998.
 1998 "Schizophrenia and Violence," Courtney Preblich, Reston Times, Reston, Virginia, August 3, 1998.
 1998 "Schizophrenia and Dangerousness," Monterrey Newspaper, California, Camille Ray, August 4, 1998.
 1998 "Innovative Day Care Program for Mentally Ill," New York Times, Russell Shorter, August 5, 1998.
 1998 "Families," Dunn McKee, Salem Magazine, September 2, 1998.
 1998 "The Starr Report," Berliner TV, September 13, 1998.
 1998 "Musicians and Psychiatry," Chris Genussa, Grammy Magazine, November 13, 1998.
- 1999 "Road Rage," WXIA-TV News, Jim Shuler, January 6, 1999.
 1999 "Small Changes, Big Results," Men's Health, Bill Stump.
 1999 "Psychological Effect of Superbowl on Fans," WSB-TV Evening News, January 14, 1999.
 1999 "Falcons Superbowl Loss," 98.5 Radio, Kelly Stevens, January 29, 1998.
 1999 "Blood Pressure and Submissiveness in Marriage," Medical Tribune, Linda Carroll, January 25, 1999.

1999 "Profiles of Serial Rapists," Fox 5 News, March 19, 1999.
 1999 "Profile of Serial Rapists," WSB-TV, Monica Kaufman, March 1999.
 1999 "Psychological Changes During Weight Loss," WXIA-TV, Audrey Kalsey, March 25, 1999.
 1999 "Serial Rapist Profile," Fox 5 News, Danielle Dardashti, April 20, 1999.
 1999 "Littleton Colorado Shooting," WXIA-TV News, April 21, 1999.
 1999 "Serial Rapist," WSB-TV, May 10, 1999.
 1999 "Intervention with Hostile Children," WXIA-TV News, Keith Whitney, May 7, 1999.
 1999 "Serial Rapist," WXIA-TV News, May 1999.
 1999 "School Shootings in Rockdale, Georgia," WSB-TV News, May 20, 1999.
 1999 "Heritage High Shooting," B 98.5 Radio Interview, May 21, 1999.
 1999 "Buckhead Shooting," WXIA-TV Early Morning News, July 30, 1999.
 1999 "Mass Murder in Buckhead," WSB-TV Morning News, July 30, 1999.
 1999 "Profile of a Mass Murder," WXIA-TV Morning News, July 30, 1999.
 1999 "Barton Profile," WXIA-TV Midday News, July 30, 1999.
 1999 "Atlanta Shootings," NBC Evening News, July 30, 1999.
 1999 "Barton Suicide Note," WSB-TV, Diana Davis, July 30, 1999.
 1999 "Mass Murder in Atlanta," CNN News, July 31, 1999.
 1999 "Buckhead Mass Murders," Global Satellite Network, July 30, 1999.
 1999 "Atlanta Shootings," Atlanta Journal-Constitution, Clint Williams, August 1, 1999.
 1999 "Atlanta Mass Murders," AP Press Release, August 1, 1999.
 1999 "Copy-Cat Shooting in Los Angeles," Watch It with Oliver North, MS NBC, August 11, 1999.
 1999 "Causes of Mass Murder in USA," NBC News, August 11, 1999.
 1999 "Shooting of Seven People in Hawaii," Keith Whitney, WXIA-TV Evening News, November 3, 1999.
 1999 "Shootings in Hawaii," Channel 46 WANX-TV Evening News, November 3, 1999.
 1999 "Copy Cat Shootings in Seattle," Channel 5 Evening News, November 4, 1999.
 1999 "Hit and Run Accidents," Todd Shearer, WXIA-TV Evening News, November 18, 1999.
 1999 "Closing of West Paces Ferry Hospital," WXIA-TV News and Radio, December 5, 1999.
 1999 "Creativity, Geniuses and Emotional Instability," National Public Radio, December 8, 1999.

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MEDIA APPEARANCES (CONT'D):

1999 "Panic Disorder," Channel 46 WANX-TV Special, Mark Adler, November 1999.
 2000 "What is a Psychiatric Disorder?" Dan Michaski, Maxim Magazine, February 2000.
 2000 "John Rucker Psychiatric Evaluation," WXIA-TV Evening News, January 7, 2000
 2000 "John Rucker Apology," WXIA-TV News, January 15, 2000
 2000 "Causes of Mental Illness," Nancy Melville, Health Scout, February 2000.
 2000 "Panic Disorder," Tony Thomas, CBS, WANX-TV Special, February 14, 2000.
 2000 "Pedophiles and the Internet," Keith Whitney, WXIA-TV News, February 21, 2000
 2000 "Psychological Trauma to Elian Gonzalez," Mary Tann, WANX-TV News, April 6, 2000
 2000 "Profiling," Chris Rantergiani, WSB-TV, April 16, 2000
 2000 "The Elian Gonzalez Case," Jane Robelot, CBS Atlanta News, May 7, 2000.
 2000 "Real Estate Rage," New York Times, June 2000.
 2000 "Schizoaffective Disorder," Wall Street Journal, July 2000.
 2000 "Mike Tyson Personality," John Phillips, Reuters, July 2000.
 2000 "Reparenting," Tony Martin, Chicago Reader, August 2000.
 2000 "Videotaping Oneself in a Crime," Channel 4 TV News, November 2, 2000.
 2000 "Rockdale County Shooting Trial of T. J. Solomon," Channels 2, 5 and 11 News, November 8, 2000.
 2000 "Gifted Children," Channel WGCL-TV News, November 13, 2000.
 2001 "Closing of Seven Psychiatric Facilities in Atlanta," Diana Davis, WSB-TV Evening News, January 10, 2001.
 2001 "Abuse in Teenage Dating," WGCL-TV Evening News, January 15, 2001.
 2001 "Hit Man Hiring Blamed on Mental Illness," Atlanta Journal-Constitution, January 24, 2001.
 2001 "Jackass MTV and Its Effects," Channel 5 TV News, February 7, 2001.
 2001 "FBI Man Revealed to be Persian Spy - Psychological Profile," MSNBC, February 23, 2001.
 2001 "San Diego School Shootings," Tom Reagan, WSB-TV Evening News, March 7, 2001.
 2001 "Rape Trauma Syndrome," WSB-TV Evening News, March 29, 2001.
 2001 "New Schizophrenia Medications," Kerry Dooley, Bloomberg News, March 30, 2001.
 2001 "Viral Causes of Schizophrenia," Robin Eisner, ABC News, April 9, 2001.
 2001 "Columbine Shooting Anniversary," Tiff Diaz, WGCL Evening News, April 20, 2001.
 2001 "Bipolar Man's Suicide," Scott Slade, WSB Radio, June 21, 2001.
 2001 "Bipolarity and Suicide," Don Dornberg, Metro Source News, June 22, 2001.
 2001 "Postpartum Depression and Homicide," Dore Carroll, Newark Star Ledger, June 27, 2001.
 2001 "Postpartum Depression and Its Manifestations," Channel 11 News, June 27, 2001.
 2001 "Are Today's Children More Spoiled than in Past Generations of Americans?" CWK Network, August 2001.
 2001 "Daycare Advances," CWK Network, August 2001.
 2001 "Increasing the Driving Age for Teens," CWK Network, August 2001.
 2001 "Psychiatric Administrators Celebrate 40 Years of Accomplishments," Psychiatric News, 2001.

2001 "Attack on America: Terrorism." Pam Martin and Gulstan Dart, WSB-TV Morning News, September 12, 2001.
 2001 "Attack on America: Coping with Your Emotions," Pam Martin and Gulstan Dart, WSB-TV Morning News, September 13, 2001.
 2001 "Attack on America: Talking with Children," Pam Martin and Gulstan Dart, WSB-TV Morning News, September 13, 2001.
 2001 "Attack on America: Make a Crisis An Opportunity to Change," WGCL-TV Evening News, September 14, 2001.
 2001 "Attack on America – How to Cope in a Positive Way," Wes Sarginson, WXIA-TV Evening News, September 14, 2001.
 2001 "Attack on America: The Second Week: Getting Back to Normal?" WXIA-TV Morning News, Ken Watts and Jill Becker, September 17, 2001.
 2001 "Psychological Effects of Terrorism," Channel 46 TV Morning News, September 12, 2001.
 2001 "Terrorism – Attack on America," WSB-TV Morning News, Pam Martin and Gulstan Dart, September 12, 2001.
 2001 "Children and Coping with the World Trade Center Terrorism," WGCL-TV News, September 13, 2001.
 2001 "Terrorism and Schodenfreude," WSB-TV Early Morning News, Pam Martin & Gulstan Dart, September 13, 2001.
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 2001 "Drugs and Schizophrenia," Carey Dooley, Bloomberg News, October 8, 2001.
 2001 "Effects of Terrorism on People with Anxiety Disorders," WGCL-TV Evening News, October 9, 2001.
 2001 "Mind Set of the Terrorist," WXIA-TV Evening News, Keith Whitney, October 10, 2001.
 2001 "Children and the Paradox of Terrorism," CWK (Children's TV) Network, October 19, 2001.
 2001 "Mind Set of the Terrorist – Domestic vs. International," WSB-TV Evening News, Randy Martin, November 2001.
 2001 "Seasonal Affections Disorders in Children," Connecting with Kids Network, Adam Whittenfield, October 25, 2001.
 2001 "Halloween, Terrorists and Children, The Malls' Cancellations," WGCL-TV News, October 24, 2001.
 Dave M. Davis, M.D.

MEDIA APPEARANCES (CONT'D):

2001 "Emotional Fallout of Terrorism," WXIA-TV, Joel Thomas, November 2, 2001.
 2001 "Here We Go Again? Plane Crash in Queens, New York! Is It Terrorism?" WSB-TV News, Diana Davis, November 12, 2001.
 2001 "Stress Reduction Techniques in Stressful Times," Katherine Misook, Family Health and Safety Magazine, December 2001.
 2001 "Holidays and Psychiatric Problems" Ellen Makkai Creators Syndicate Newspaper, December 18, 2001
 2001 "Holiday Hints" Jeff Daughtree, WSB Radio, December 26, 2001.
 2002 "Adolescent Crashes Plane into Building" WGCL-TV, Channel 46, January 7, 2002.
 2002 "Children Imitating Jackass TV", Carolyn Day, Fox Channel 5 TV, February 7, 2002.
 2002 "Post-partum Depression-The Andrea Yates Decision", Channel WXIA Evening News, February 19, 2002.
 2002 "Crematorium Crisis" Fox News, February 22, 2002.
 2002 "Bodies not Cremated in North Georgia" Keith Whitney, WXIA TV, Late News, February 22, 2002.
 2002 "Crematorium bodies exposed" WCGL (CBS) Evening News, February 22, 2002.
 2002 "How Should Parents handle the Crematory Scandal with Children?" Yvette Brown, Connecting with Kids TV, March 3, 2002.
 2002 "Opinions on Same Sex Schools" Yvette Brown, CWK TV, March 3, 2002.
 2002 "Internet Pranks- What Motive?" Ellen Baunstein, Present Price, March 27, 2002.
 2002 "Local Teachers Suicide" Diana Davis, WSB TV Evening News, April 11, 2002.
 2002 "Healthy Processing of 9-11 or PTSD" Tiffany Cochran, WXIA-TV Evening News, March 11, 2002.
 2002 "Schizophrenia Treatment Options" Kerry Dooley, Bloomberg News, May 16, 2002.
 2002 "Renewed Talk of Domestic Terrorism" Fox Channel 5 News, May 20, 2002.
 2002 "New Drugs for Schizophrenia" Andrew Smith, Trenton Times, May 22, 2002.
 2002 "Clinical Management of Schizophrenia" Thor Terleckyl, Pharmaceutical Innovations, July 24, 2002.
 2002 "New Drug for Schizophrenia – Abilicate"-Rans Pierson, Reuters, August 23, 2002.
 2002 "Withdrawal Symptoms from Paxil" Diana Davis, WSB TV News, August 26, 2002.
 2002 "9-11 Anniversary" Joel Thomas, WXIA TV, September 11, 2002.
 2002 "Profile of Serial Killer-The Sniper" Kevin Rowson, WXIA TV Evening News, October 7, 2002.
 2002 "Sniper Profile" Diana Davis, WSB TV, October 8, 2002.
 2002 "Sniper Profile" CNN, October 10, 2002.
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 2002 "Sniper Profile" Joe Watson, WXIA TV News, October 24, 2002.
 2002 "Clozaril and Suicidality in Schizo Affective Disorder" Dow Jones News, October 31, 2002.
 2002 "Video Taped Criminal Behavior at West Georgia College" Tiffany Cochran, WXIA TV News, November 20, 2002.
 2002 "Stressed or Depressed since September 11? You're not Alone." Kathleen Misovic Family Safety and Health Spring 2002.
 2002 "Why did Wynona Ryder Shoplift?" Keith Whitney, WXIA-TV News, December 5, 2002.

2002 "The Body-Mind Connection" Dave M. Davis, M.D., Host – A Radio Talk Show
KFNX Phoenix
WALE Providence Rhode Island
WWW.STREAMAUDIO.COM

2002 "The Mind-Body Connection" Guest: Dr. Harold Eist, February 20, 2002.

2002 "New Treatments for Anxiety and Depression" Guest: Dr. Phillip Ninan, February 27, 2002

2002 "New Developments in the Treatment of Psychiatric Disorders" Guest: Dr. Walker Brown, March 6, 2002

2002 "Substance Abuse" Guest: Dr. Paul Earley, March 13, 2002.

2002 "Helping Adolescents" Guest: Dr. Annie Cooper, March 20, 2002.

2002 "Eating Disorders" Guest: Dr. Patricia Donley, March 27, 2002.

2002 "How to Protect you Children from Child Molestation" Guest: Dr. Gene Abel, April 3, 2002.

2002 "Love at First Sight" Guest: Ms. Kim Jones, April 10, 2002.

2002 "Dreams, Do they Really have any Meaning?" Guest: Dr. Alfred Messer, April 17, 2002

2002 "Hospice and Grieving" Guest: Dr. John Shuster, April 24, 2002

2002 "Marriage, Divorce & Screwing Around" Guest: Dr. Frank Pittman, May 01, 2002.

2002 "New Drugs for the Treatment of Mental Disorders" Guest: Dr. Charles Nemeroff, May 08, 2002.

2002 "Women's Problems" Guest: Dr. Sandra Fryhofer, May 15, 2002.

2003 "Differential Effects of War on Individuals," WSB-TV Evening News, February 13, 2003

2003 "Psychiatric Effects of War," WXIA-TV Evening News, Channel 11, February 13, 2003

2003 "Columbine Revisited," New Video Produced-Implications of the Psychologically Impaired, WXIA-TV Evening News, October 22, 2003.

2003 "Police Officer Stress," WXIA-TV Evening News, Keith Whitney, August 18, 2003

2003 "Old World Maps", Daily Tar Heel, Chapel Hill, N.C., November 5, 2003

Dave M. Davis, M.D.

MEDIA APPEARANCES (CONT'D):

2004 "Double Homicide in Gwinnet County," WXIA-TV, Channel 11, Evening News, January 19, 2004.

2004 "How Children can Handle Strangers Who Approach them. Facing Child Abduction," Keith Whitney, WXIA Channel 11 Evening News, February 9, 2004.

2004 "SSRI's and Suicide Warning," Kay Flowers, WXIA-TV, Channel 11, Evening News, March 22, 2004.

2004 "Parents who sell their Children for Sex," Kevin Rowson, WXIA TV, Channel 11 Evening News, April 14, 2004.

2004 "A Child Molestation Trial Gone Wrong?" Jennifer Leslie, WXIA-TV, Channel 11, Special Series, July 2004

2004 "Helplessness," Mark Andrew, WGCL-TV, May 13, 2004.

2004 "A Serial Arsonist Profile," Blair Meeks, WXIA Channel 11 News, June 7, 2004.

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2004 "Power of Suggestibility," WSB Channel 2 News, June 30, 2004.

2004 "Sex Bracelets and Their Meanings" Katherine Bohlander, WGCL-TV, November 18, 2004.

2004 "Scientists are scanning our brains to learn how to sell a candidate." Keith Whitney, WXIA-TV Evening News, October 28, 2004.

2004 "Anticonvulsants' OK'd for Bipolar Mania," Alicia Ault, Clinical Psychiatry News, January 2005

2005 "Criminal Mind Set and Rage-Violence," Jessica Mikulski, Chicago Tribune, March 11, 2005

2005 "Courthouse Shooting," Keith Whitney, WXIA TV Evening News, March 16, 2005

2005 "Violence in Fulton County Courthouse," UPN 10 PM News, March 16, 2005

2005 "Copy Cat Shootings," Channel 11 Evening News, March 23, 2005

2005 "An Analysis of Eric Rudolph's Statement," WSB TV News, April 14, 2005

2005 "Cyclothymia" Washington Post News Paper, Stacey Cotino, September 10, 2005

2005 "How witnesses distort vs. true perception," Channel 2 News, Tom Reagan, September 13, 2005

2005 "The Nichols Case," Fox 5 News, Angelique Proctor, November 16, 2005

2006 "The Choking Game," The O'Reilly Factor, Fox News, January 2006

2006 "Most Depressing Day", MSNBC, January 24, 2006

2006 "Entwhistle Homicide Suspect," The John Gibson Show, Fox TV News, January 31, 2006

2006 "Natalie Holloway Suspected Murder Case," CNN News, February 2006

2006 "Sullivan Murder Trial," Court TV, March 20, 2006

2006 "Jon Benet Case", WOKU, WKOU, WOWO, KVBK Radio Show, August 23, 2006

2006 "Carr Confessions", Various Radio Shows, August 22, 2006

2007 "Munchausen's by Proxy," Tiffany Cochran , WXIA TV Evening News, March 13, 2007

2008 "Gary Hilton Case", Scott Slade, WSB Radio, January 10, 2008

2008 "Multiple Personality Disorder", Veronica Waters, WSB Radio, April 14, 2008

2008 "Human Rights and Health in under developed countries", The Human Rights Awareness Symposium, United Nations, December 11, 2008

2009 "When It's more than Clutter", Jennifer Preges, AJC, December 31, 2009

2010 "Cleaning up after hoarders is a booming business" Christian Boone, AJC, August 31, 2010
2010 "Razor Blades found at the Park", Channel 9 Columbus, GA WTVM
2011 "Hoarding" CBS-Atlanta, June 23, 2011
2011 "Physician Suicide" Piedmont Hospital Medical Staff meeting, August 18, 2011
2013 "Boston Marathon Terrorists Profile", Christopher King, CBS News, May 2013
2013 "A new treatment for Narcotic Addiction", Tom Reagan, WSB-TV, May 2013
2013 "Ohio Kidnapping", Christopher King, CBS News, May 2013

Revised August 2013 DMD/djm

DAVE M. DAVIS MD
 1938 P'TREE ROAD, N.W.
 SUITE 505
 ATLANTA, GA 30309
 (404)355-2914

Page: 1

6/13/2012

Guarantor: Atty Jan Warner ARGO V Three
 Warner Payne Black LLP
 1122 Lady Street #1200
 Columbia, SC 29201

Account #: ARG00000

Case Name: JAN WARNER ATTY.

Payment is due upon receipt of this invoice.
 Please remit the balance due immediately to the address at the top of the invoice.
 Make check payable to: DAVE M. DAVIS

Date	Procedure	Diagnosis	Description	CPT	Charge
3/28/2008	CHECK PAYMENT		#5178 Elderlaw Services of SC	CHECK	-4,000.00
3/28/2008	REVIEW OF RECORDS			90825	2,100.00
4/3/2008	CHECK PAYMENT			CHECK	-1,000.00
3/30/2008	REVIEW OF RECORDS			90825	1,500.00
4/7/2008	REVIEW OF RECORDS			90825	1,000.00
4/7/2008	CONSULT			L2	400.00
4/8/2008	CHECK PAYMENT		#5209 Elderlaw Services of SC	CHECK	-1,000.00
4/8/2008	CHECK PAYMENT		#5211 Elderlaw Services of SC	CHECK	-2,500.00
4/14/2008	REVIEW OF RECORDS			90825	2,550.00
4/14/2008	CHECK PAYMENT		#5213 Elderlaw Services of SC	CHECK	-3,500.00
4/18/2008	REVIEW OF RECORDS			90825	900.00
4/21/2008	REVIEW OF RECORDS			90825	850.00
4/24/2008	INITIAL EVALUATION			90801	2,500.00
4/30/2008	REVIEW OF RECORDS			90825	0.00
4/30/2008	CONSULT			L2	0.00
4/30/2008	REPORT			90889	1,000.00
4/30/2008	CASE PREP			L13	0.00
5/1/2008	REVIEW OF RECORDS			90825	250.00
5/5/2008	REVIEW OF RECORDS			90825	150.00
5/5/2008	REPORT			90889	0.00
5/5/2008	REPORT REVIEW			L15	0.00
5/5/2008	CASE PREP			L13	0.00
6/16/2008	REVIEW OF RECORDS			90825	500.00
6/24/2008	AFFIDAVIT			L23	100.00
6/30/2008	CHECK PAYMENT		#5395 Elderlaw Services of SC	CHECK	-1,800.00

Provider Information

Provider Name: DAVE M. DAVIS MD
 License: 12166
 Tax ID:

Total Charges: \$ 13800.00

Total Payments: \$ 13800.00

Total Adjustments: \$ 0.00

Total Due This Visit: \$ 0.00

Total Account Balance: \$ 0.00

**DEFENDANT'S
 EXHIBIT**

5/30/13

MRL

Three Rivers/Burrell 000187 (Dr. Davis)

01013

Piedmont Psychiatric Clinic
Sheffield Building, Suite 505
1938 Peachtree Road, N. W., Atlanta, GA 30309-1254
Office: 404-355-2914 Fax: 404-355-2917
Adolescent, Adult, Family and Administrative Psychiatry

FELLOW:

American Psychiatric Association
Southern Psychiatric Association
Georgia Psychiatric Association

CERTIFIED:

American Board of Psychiatry and Neurology
American Board of Forensic Psychiatry, Inc.
American Psychiatric Association in Psychiatric Administration
American Board of Disability Analysts

FEE SCHEDULE CONTRACT

RE: Argo v Three Rivers

1. This agreement pertains to providing expert psychiatric services to this patient with reference to the above captioned matter. Bills shall be payable within thirty days.

(A) Non-Refundable working retainer to be paid before work commences, to be paid by law firm or client, to be credited to total bill.....\$4,000.00

(B) Psychiatric consultation and evaluation; psychological testing; conferences; research; written reports; affidavits; review of medical records, hospital charts, depositions, and other data.....\$500.00/Hr

(C) Deposition-testimony.....\$500.00/Hr

We try to schedule depositions at the convenience of all parties. The deposition fee is \$500.00 per hour, and the minimum fee for depositions is \$1,000.00. The attorney taking the deposition will need to send a deposit to hold the deposition time. This will be refunded in full if the deposition is cancelled *more than ninety-six hours* in advance (exclusive of weekends and holidays), and one-half will be refunded if it is cancelled *more than forty-eight hours* in advance. There will be no refund if the deposition is cancelled *less than forty-eight hours* in advance. Prepayment should be made in advance for the entire time needed. If more hours than two are requested, a retainer for the full amount should be sent.

(D) Court-testimony.....\$500.00/Hr

Fees for expert psychiatric testimony in court and days away from home or office are billed for a full calendar day (8 hrs/\$5,000) within the state of GA. and not for any increments of time thereof. Outside the state of GA., a full day fee of \$6,000 will be billed. Within the Metro Atlanta area, time away from the office, and resulting cancellation of any patients or appointments missed by doctor because of testimony will be billed at \$500 per hour door to door. At least one full day's fee is payable in advance of testimony. Any balance is due and payable within 30 days. Traveling, hotel, meals, and other incidental expenses to testify in court will be billed after computation. If court testimony is cancelled less than 48 hours in advance, 50% of charge will be made. If court testimony is cancelled less than 24 hours in advance, full charge will be made.

(E) Work received on "short-notice" that must be performed for the client attorney's convenience at night or on week-ends will be billed at 1 1/2 times customary rate.

(F) On all IME's, we appreciate the requested retainer be sent as soon as the date for the IME has been determined. Cancellations in less than four working days will be billed for all times not filled. The retainer will be the no-show fee.

2. It is hereby specifically agreed that payment of all fees and expenses as outlined herein are the full responsibility of the undersigned attorney and law firm of which he/she may be a member and payment is not contingent on any verdict or settlement of the above captioned matter. If collection is necessary on any outstanding balance, the undersigned law firm agrees to pay costs and attorney's fees in reference to this account.

3. Sign one copy of this contract and return it to this office with the retainer. Keep one copy for your records.

AGREED AND ACCEPTED ON THIS: _____ day of _____, 2008

BY: _____

Client's Signature (Authorized Agent for Services & Payment)

BY: _____

DAVE M. DAVIS, M.D., D.L.F.A.P.A., F.A.B.F.P.

FIRM NAME and ADDRESS: Jan Warner, Attorney @ Warner, Payne & Black, LLP 1122 Lady Street, # 1200, Columbia, South Carolina 29201 Office: (803) 799-0554 Fax: (803) 799-2517

(19)

Three Rivers/Burrell 000195 (Dr. Davis)

Dr. Davis
FYE

Piedmont Psychiatric Clinic
Sheffield Building, Suite 505
1938 Peachtree Road, N. W., Atlanta, GA 30309-1254
Office: 404-355-2914 Fax: 404-355-2917
Adolescent, Adult, Family and Administrative Psychiatry

[Redacted Signature]
[Redacted Name]
[Redacted Title]

FELLOW:
American Psychiatric Association
Southern Psychiatric Association
Georgia Psychiatric Association

CERTIFIED:
American Board of Psychiatry and Neurology
American Board of Forensic Psychiatry, Inc.
American Psychiatric Association in Psychiatric Administration
American Board of Disability Analysts

FEE SCHEDULE CONTRACT

RE: Atgo v Three Rivers

1. This agreement pertains to providing expert psychiatric services to this patient with reference to the above captioned matter. Bills shall be payable within thirty days.

(A) Non-Refundable working retainer to be paid before work commences, to be paid by law firm or client, to be credited to total bill. **\$500.00**

(B) Psychiatric consultation and evaluation; psychological testing; conferences; research; written reports; affidavits; review of medical records, hospital charts, depositions, and other data. **\$500.00/Hr**

(C) Deposition-testimony. **\$500.00/Hr**

We try to schedule depositions at the convenience of all parties. The deposition fee is \$500.00 per hour, and the minimum fee for depositions is \$1,000.00. The attorney taking the deposition will need to send a deposit to hold the deposition time. This will be refunded in full if the deposition is cancelled more than ninety-six hours in advance (exclusive of weekends and holidays), and one-half will be refunded if it is cancelled more than forty-eight hours in advance. There will be no refund if the deposition is cancelled less than forty-eight hours in advance. Prepayment should be made in advance for the entire time needed. If more hours than two are requested, a retainer for the full amount should be sent.

(D) Court-testimony. **\$500.00/Hr**

Fees for expert psychiatric testimony in court and days away from home or office are billed for a full calendar day (8 hrs/\$5,000) within the state of GA, and not for any increments of time thereof. Outside the state of GA, a full day fee of \$6,000 will be billed. Within the Metro Atlanta area, time away from the office, and resulting cancellation of any patients or appointments missed by doctor because of testimony will be billed at \$500 per hour door to door. At least one full day's fee is payable in advance of testimony. Any balance is due and payable within 30 days. Traveling, hotel, meals, and other incidental expenses to testify in court will be billed after computation. If court testimony is cancelled less than 48 hours in advance, 50% of charge will be made. If court testimony is cancelled less than 24 hours in advance, full charge will be made.

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(F) On all IME's, we appreciate the requested retainer be sent as soon as the date for the IME has been determined. Cancellations in less than four working days will be billed for all times not filled. The retainer will be the no-show fee.

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3. Sign one copy of this contract and return it to this office with the retainer. Keep one copy for your records.

AGREED AND ACCEPTED ON THIS: ____ day of ____, 2008

BY: _____
Client's Signature (Authorized Agent for Services & Payment)

BY: _____
DAVE M. DAVIS, M.D., D.L.F.A.P.A., F.A.B.F.P.

FIRM NAME and ADDRESS: Jan Warner, Attorney @ Warner, Payne & Black, LLP 1122 Lady Street, # 1200, Columbia, South Carolina 29201 Office: (803) 799-0554 Fax: (803) 799-2517

20

Three Rivers/Burrell 000196 (Dr. Davis)

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

MARTHA LEWIN ARGOE *Case*

PLAINTIFF,

vs.

THREE RIVERS BEHAVIORAL
HEALTH, LLC and PSYCHIATRIC
SOLUTIONS, INC., ITS SUCCESSOR;
PHYLLIS BRYANT-MOBLEY, MD;
GLENN HOOKER, MD; AIKEN
REGIONAL MEDICAL CENTER,
AURORA PAVILION; DAVID A.
STEINER, MD; CHERYL G. DODDS,
MD; DORIS ANN BURRELL, RN;
CAROLINA CARE PLAN; JAMES F.
WALSH, JR.; G. LEWIS ARGOE, JR.;
and GEORGE L. ARGOE, III,

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
ELEVENTH JUDICIAL CIRCUIT

DOCKET NO.: 2007-CP-32-1981

AFFIDAVIT OF DAVE M. DAVIS, M.D.
FILED ON BEHALF OF PLAINTIFF

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON

MARTHA LEWIN ARGOE

PLAINTIFF,

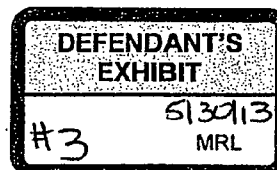
vs.

GEORGE LEWIS ARGOE, III
Individually and as purported
"Trustee", G. LEWIS ARGOE, JR.
JAMES F. WALSH, AMERIPRISE
FINANCIAL SERVICES, MALCOLM
LYNN NORRIS AND PANDORA
JONES-GLOVER,

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
ELEVENTH JUDICIAL DISTRICT

DOCKET NO.: 2006-CP-07-2013



Three Rivers/Burrell 000182 (Dr. Davis) ⁵

AFFIDAVIT OF DAVE M. DAVIS, M.D., D.L.F.A.P.A., F.A.B.F.P.

PERSONALLY APPEARED BEFORE ME

DAVE M. DAVIS, M.D., D.L.F.A.P.A., F.A.B.F.P., who, being duly sworn, says:

1. My name is Dave M. Davis. I am a licensed medical doctor specializing in psychiatry. I am Board Certified in Clinical Psychiatry, Forensic Psychiatry, Administrative and Management Psychiatry, and Disability Analysis. My curriculum vitae is attached hereto and incorporated herein by reference.
2. I have been accepted to testify as an expert in State and Federal Courts in Georgia, North Carolina, South Carolina, Alabama, Florida, Indiana, and Massachusetts.
3. During my career, I have been Psychiatric Director/Medical Director of two psychiatric hospitals, Peachtree Hospital and also Parkwood Hospital, both in Atlanta, Georgia. I have also been Chairman of the Consultation Service of the American Psychiatric Association, which is that arm of the A.P.A. that advises mental health facilities and psychiatric hospitals regarding policies, treatment procedures, credentialing, et cetera.
4. As set forth in my curriculum vitae, I have written extensively with regard to commitments and mental-hospital procedure and protocol in treating inpatients. I am Board Certified in Psychiatric Administration and Management, and have been a Board examiner on this subject on multiple occasions.
5. I was retained by Jan L. Warner of Warner, Payne, & Black to review medical records, depositions, and other documents with regard to the above-entitled matter. During the course of my review, I have read and considered the commitment proceedings, and the records from the Orangeburg Mental Health Center, the Aiken Regional Medical Center/Aurora Pavilion, Three Rivers Behavior Health Center, and Coastal Empire community Mental Health.
6. I have also reviewed the Orangeburg County Guardianship and Conservatorship file and the affidavits of Dr. John DeWitt, Dr. Frank Quinn, and Dr. Carey Washington.
7. On the 24th day of April 2008, I conducted an evaluation of Martha L. Argoe in my office.

Three Rivers/Burrell 000183 (Dr. Davis) 6

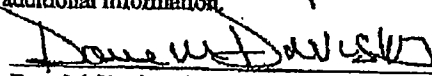
Affidavit of Dave M. Davis, M.D., D.L.F.A.P.A., F.A.B.F.P.
April 30, 2008
Page two of three

8. Based upon the records which I have been provided and my personal evaluation of Mrs. Argoe, I have the following interim opinions that I express within a reasonable degree of medical certainty:
- a) The record of Dr. Glenn Hooker's handwritten statement (one copy of which is undated and another copy of which is dated June 8, 2005) is not sufficiently supported by a psychiatric medical evaluation record that would have justified Mrs. Argoe's involuntary commitment. The standard of care requires a full psychiatric evaluation, as justification for the deprivation of freedom that occurs when someone is involuntarily committed to a psychiatric facility.
 - b) Given the fact that Mrs. Argoe was released after a negative MRI at the Orangeburg Regional Medical Center on June 7, 2005, and another Order authorizing her pickup was not issued, the legality of her admission is questioned.
 - c) Mrs. Argoe's admission to Aiken Regional Medical Center/Aurora Pavilion was on an interim basis when it was determined that her insurance would not pay for Mrs. Argoe's stay. Based upon what appears to be a very limited evaluation, it does not appear that there is a sufficient record to justify the interim opinions issued from Aurora Pavilion and Dr. David Steiner, that Mrs. Argoe suffered from bipolar disorder.
 - d) The record at Three Rivers, as a whole, does not contain sufficient testing and other data to support a diagnosis of bipolar disorder.
 - e) To the contrary, the June 25, 2005, second opinion of psychologist Tami Leonhardt concerning the history, called to the attention of Three Rivers' staff, should have alerted the psychiatrist to more in-depth evaluation. This opinion, although acknowledged by Three Rivers' staff, was not sufficiently addressed or taken into account as noted in the medical record, and they continued to hold Mrs. Argoe as an inpatient until July 20, 2005, based upon what I consider to be unsupported diagnosis and continuing treatment.

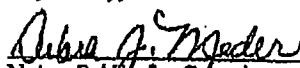
Three Rivers/Burrell 000184 (Dr. Davis) 7

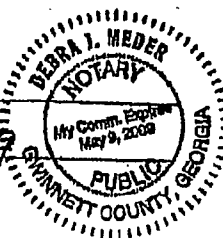
Affidavit of Dave M. Davis, M.D., D.L.F.A.P.A., F.A.B.F.P.
April 30, 2008
Page three of three

8. f) At the time of my psychiatric evaluation of Mrs. Argoe, I saw no evidence of her having any condition that is appropriately treatable with medication or an inpatient setting.
- g) Three Rivers did not provide Mrs. Argoe with a thoroughly physical examination, including electrocardiogram, prior to administering significant doses of antipsychotic medication, which, according to the record, caused or precipitated irregular heartbeats.
- h) I can find no justification in the records for either Mrs. Argoe being an inpatient for forty-one (41) days or the insurance paying for this length of stay.
- i) Based upon my experience, prior to extending coverage past its policy provisions the insurer should have required an Independent Medical Examination of Mrs. Argoe.
- j) The aggressive manner in which Mrs. Argoe's husband communicated with Nurse Trow and Coastal Mental health, when Dr. Reamy determined that Mrs. Argoe did not have the condition diagnosed by Three Rivers, is indicative of why Dr. Leonhardt's opinion should have been followed.
- k) A forty-one (41)-day stay in an inpatient mental health facility is unusual, particularly considering the lack of documentation contained in the medical record and, based upon that which I have reviewed, was not justified here.
9. All opinions set forth herein are interim opinions and are subject to modification upon receipt of additional information.


Dave M. Davis, M.D., D.L.F.A.P.A., F.A.B.F.P.

Sworn to before this 6th
Day of May, 2008


Notary Public for Georgia
Commission Expires: May 9, 2009



Three Rivers/Burrell 000185 (Dr. Davis) 

FILE COPY

PERSONALLY APPEARED BEFORE ME DAVE M. DAVIS, MD, who, being duly sworn, says:

1. My name is Dave M. Davis. I am a licensed medical doctor specializing in psychiatry. I previously submitted an affidavit dated May 6, 2008 to which was attached my vitae.

2. After the execution of that affidavit, I received and reviewed the records of Dr. Tami Leonhardt consisting of 17-pages that were provided to me.

3. Based thereon, it is even more clear to me that the treating physicians and staff at Three Rivers Behavioral Health should have been "tipped off", or at least questions raised in their minds with regard to the quality and veracity of the information provided to them by Mrs. Argoe's family upon which they were relying.

4. In my opinion, psychological testing is useful in psychiatric treatment.

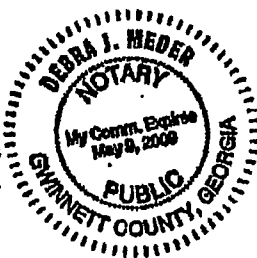
5. Based upon what I have seen, Dr. Leonhardt did the only psychological testing of Mrs. Argoe and, based upon my review of the same, I find that Dr. Leonhardt's report and testing results relative to Mrs. Argoe reflect normal responses from a healthy person.

6. In my opinion, the failure to follow up on psychological testing and Dr. Leonhardt's report is outside the generally accepted psychological practice.

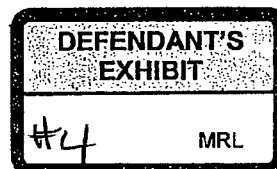
7. All opinions set forth herein are interim opinion, and are subject to modification upon receipt of additional information.

Sworn to before this 24th day of June, 2008.

Debra J. Meder
Notary Public for Georgia
Commission Expires: May 9, 2009



Dave M. Davis, M.D.
Dave M. Davis, M.D.



affidavit.
Sent via
Fedx - 6/25/08
Invoice -
(9) Meder

Three Rivers/Burrell 000186 (Dr. Davis)

Argues

2-24-12 Mr. Dobson

6-6-05 ~~Let go~~ know! (12)

6-7-05 Starts in hooked (R) team post hug up
O'Donoghue Reg

Hobley
Dodd's

Reamy

Stinner

Burrell (CRN)

Quinn & P

Stinner

Deerora - Invol (dub)

6-6 Picked up from to Deerora

6-9 Two Rivers

Protect Judge 6/24

Obtained by my proper eval based on
false testimony

Capt & gaske

no spill at out

6-24 Order

intr. eval

Will Davidson -

Jim Pasham -

Elory Gaudes -

Andromeda bea & -

Shannon thank -

Sim Davis

Hobley

Dodd's

Stinner

Burrell + Peter

Quinn + Arter

(12) TC

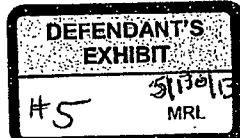
Arter

Arter

Arter

Arter

Arter



Argos

5/25/13

Dr Reaney dep (and nurse Trow) ?

(never himself saw evidence of AB)

(4) affidavit

Dr. Quinn agreed to Reaney + Trow - "no evidence

was argos. Needs of his mother & help.

for M.I.

Dr. Elmore - rec ind. report

(4) + threatening, demanding, asfitted

Burrell - wait then it is

~~Argos~~ Dr. Reaney

② Lewis
Son Bug

3-15-13

Argore Case

green

Dr. Peany - never saw bipolar or hypomanic
Prop ② Maria TX before commitment

Nurse Tribar - no evidence re

red
file

Mr. Argore - deceased re! quack doctor

Geo. Lewis Argore Jr. ② - started drinking

mother Argore - inherited from his - Grandmother, N.C.

Prop - ② - took stuff, threatened to kill her. Alf
Walsh - based illegal Pot & sign over

her prop. - Conspiracy

Geo Lewis Argore - Son

James Wolsey - only

Cheryl Dobbs M.D. - if - believed she was bipolar

Dr. Lichtenst & Paul - re ex nurse

Argore
file

black
frank

Illegal deal tx in 5/05

Commit 6-6-05

Dr. Harker is even! part of & ORMC

signed commit & even

Aurora - Dr. Stefani saw her

tx → 3 Rivers

6-7-05 & filed to be Granted CMC.

(7-20-05
sk

End
1st
file

Dr. David Zinner

WHP on 6-9-05

signed on 6-26-05 ..

Mr. Dodson

In covered

3-16-83 Argo Call

Jan waived trial

S.C. Sys. Ct. reentered

ind. maly. no hosp.

Hosbar got out procedural

- ① not danger to self or others
- ② repeating apt. to invol. commitment
with force + use of force } not reported
balance.

Int. Eval needed!

Good ins & ,
least restriction

Orangbeary sent her home!
next day → back again
Dadds ↑ case

His legs (rt) said buggch
(rt) told me he
had

Mr. Dodson
1-803-252-2600
office

3-16-13

Argos

D. Mobley dep

designated examiner @ Probate

first saw MS Argos 6-10-05

last note 6-24-06

Did not employ OED

2nd official - Dr. thea

not present
2 days

65
335-6230

3-16-13

D. Parks dep

Saw Mr. Argos 6-27-05

3-16-13

Regina Scherz DA RN Dep

3-16-13

Doris Burnett RA

3-17-13

advising @ 5 Rivers

3-17-13

Barbara Sujardat dep

inmate - clear - @ unkill door

never saw anything

3-17-13

Depo Jim Zupar

Carolina Care PCm

3-17-13

Keowee field - Apprehend

low - drunk - took control

3-17-13

Grig Collegeo darma dep

Saw a pt saw at Xth 1989 04

JAN 2006 July 5th 2006 Sept 26, 2006

Argonne
 4/14/13 Shelby Ross Depo LPC
 re: stolen and Rec look like
 sunset
 no FF.
 Ronald Rogers Depo CM
 saw his type once in 6-9-05 then
 Depo Heather Hammer CTR
 note in 6-9-05

3-15-13 Martha Argonne Depo

bro - Read - up EXT - no rel. - dir. X3
 SIS Danno - no rel.

Dr. Oct 2007 - verb + play above 2 AC
 pages 2000 on - push, threatened,
 called police - SX

to @ seen brought Coevell and prop in with
 Det @ would dir. 2003/14
 Sm - Bass - no rel.

no YD vs Dr. Reaney

(Outrageous) got in w/ Jeff in 10th before
 her trial via Dr. Madley

Attorney: Robt. Dodson - Ms. Argonne

Andrew Cole - 3 Rivers, Ms. Burrell

Andrew Dickerson - Psychiatrist Social

Wm Davidson - Dr. Bryant Madley

Shelton Haile - Atkes 2 Loes 21 KN

Elmore Gaites - Dr. Steinman

James Parkman - Dr. Dobbs

Noah Hiles
 Extra Care
 + Denise
 Boggia

3/23/5

Guzon

med
in psychosocial crisis! They knew she wasn't
dead.)

All based on what (H) said
P.W. are never descriptive of any
particular sex

~~XXXX~~

This should have told them!

All sex desc. are just repeats
of what sex (H) told them

~~X~~

For a week she was on suicide watch
Leonhardt 674-05 and was huge

attractive

spontaneous affect

ecological mood

thought processes clear

coherent

goal-directed.

denied A/V halluc.

denied delirious mood

sleep OK

appetite OK

denies suspiciousness

PAI - normal - depressive

unlikely violent

But the mental scale showed

no elevation

was
fine!

Argo

Athen 6/8/05

6/6/05 ~~Q2~~ Order of Protection
by Judge James. G. O'Connor

Dr Steiner and Dr. Harber's wife in
NO escalation

6-9-05 TX to 3 Rivers

Dr Steiner eval 6-8-05

sunbathed cool

30 times what they said

2 lines of ECGs

on USZ heart, well groomed, OX3

loads of grapes - in the morning - leaves H/D -

* no perspiration - no delirium, no grandiosity
speech a little pressured

laughs leaves problems - in coordination

no flight of ideas

the bagged her on the ground by

touchy *

Q2 22 ??

her P.H. very (at her age)

* NO sleep problems ever documented

saw Dr Washington 7/6/06 - Oct 07

(Dr. Quinn + Dr. Dewitt) - was. 2nd year

of this year @ Charles Barrell

[See Saw no illness]

Did she pursue her Life story
her Temperament
The Provocations
Her responses & it's dimension

Where did the doctors collaborate?

Complex cases

OSVN not well documented

uneven descriptions - ambiguous

"Vignettes" not back up by clinical OSVA

Cultural inequities

etiopathogenic explanations

behave ment

NO ST

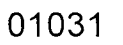
NO DOX? (D)

NO HT

where's the psychoses

Some attempt to assure the accuracy of
collateral information obtained or
provided is indicated

was she ever asked to provide other
collateral information?



PHONE CALL

FOR	Dr. Davis	DATE	25-08	TIME	1:17 PM
OF	Mr. Jan Warner City in Columbia SC				
PHONE/ MOBILE	803-799-0554				
MESSAGE	Please have him interrupted -				
	Possible new case				
	ARGO r Three Rivers				
	Behavioral facility +				
	About Three Doctors -				
SIGNED	Habra Meder				
	☒ TELEPHONED				
	☐ RETURNED YOUR CALL				
	☒ PLEASE CALL				
	☐ WILL CALL AGAIN				
	☐ CAME TO SEE YOU				
	☐ WANTS TO SEE YOU				

5/25/08 ~~Martina~~ Argo - 65 CV

(A) Ale

Son to

affluent in herance

(M) pros

2005 - took Port

made son her agent

xced
case

sent
CV

not contract
good

Not refundable
working

(A) + Son - went to atty together

+ put her in to need help
(no th)

(A) → MHC orangeburg

(A) - 6.2 fish

took 1st

go to atty - use Port - to asset

→ trust for him

(violation)

of last need

identified (A) Thru Probate Ct

CV neg

pick her up → Aiken Probation

→ 3 Rivers + Sue refuses

meds. - Stop Search →

at 3 Rivers - Cl. O etc.

"bifactor" - shot - 6/14 sees

Cl. 4 - better cl. th - (M)

stays - defers dx

(22)

(21)

2 days in S.

full time so bad

Keep 1 yr - send
down to Beaufort

2006

gear down

no guard and tiger

D. honey - 1/2 mids

1/2 worm to her

④ Threats of Nerve

Set all prob. action ased

3 Rivers gain full Dec to ④ atty

to get guard and fix

and prob judge 3 Rivers ④
atty, ④

④ Team Settle

2 Cl. ④, ④ examine - Saw ok

41 day: 1/2 b. polar

onset

Now fraction some

Don burst ④ local

Good

23

4-7-08

Argue

→ DOB

April 20, 05
April 22, 05

Excl at ~~Bay~~ ~~Orangeburg~~ with - 5/15/05
④ files for inv. 1. error, then by Lewis Argue
⑤ gives the ~~comparable~~ ~~in~~ MI
Dr. Hooker excl - date? ~~the~~ ~~ph?~~
(Did he see the ph?)

Leopold's
date as sub
to one

6-7-05 CT/UTP
Aiken Rep and Ch. 6-8-05
Three Rivers 6-9-05

Dr. Steiner eval 6-9-05
Dr. Mahley (Dr. Dobbs location = MI)
6-10-05 6-16-05

June 14, 05 ~~can~~ ~~Opinion~~ ~~Favor~~ ~~Leah~~ ~~Gerdt~~ CI V
invalid

~~Cory Worland~~ ~~no MI~~
~~Test & her~~

~~Cost~~ ~~Depo~~
MS Trow ~~no~~
Dr. Reamy - ~~no~~ ~~MI~~
Dr. Deewitt?
Dr. Quinn?

2-9-06 Dr. Washington PFD

9-26-06 boo, sis, sis-in-law - ~~stated~~ ~~us~~ ~~he~~

1-28-66 ~~at~~ ~~Coastal~~ ~~Exposure~~ ~~road~~
Closed one

Mr. Boon - Chairman of the

Argre - Mark 2

Atty helped her
to ~~establish~~

24/08 Arrived one hour late - no paper work

W. Myrtle Beach - lived there @ (u)
(u) '64 Aug 22
Clermont, W. Fl

65 when I am - want freedom

(u) } told me e/T to do [you let me]

noted other of ~~disturbance~~ other
interference @ 90's (early) - got my own
day. on leave until then -
costs ~~more~~ -

For me - local me - brought land
a forestry

Leads - (u) - in '64 while started @ USC
with in '61
She did 2 yrs - not PG -
child born '67

constant person

(u) 30 years - then Δ occurred
results leads

different philosophy

Leads travelled - "business trips" -
"with Gen Ofe"

both

between her and other women -

no evidence -

Cooper Gen to his secretary

(37)

① L. fired from aly Gess- bec. of women

- rumors

his drunk all the time - excessive -

Martha's parents probid Lewis out -

and me myself
[bitter]

He would remove me from any future

allowed me to go to Gess Club

"Anything I said in Gess Club had
find out" so I resigned

nothing + to - set up

was - the model "ruled the roost"

He called me f - stupid

He'd hit me - over and over to me

Angora Arken
3 times

Dr. Correy Washington CIV PWD p hog.

Dr. Hooker - 10" in Lewis + Soc wkr

deputy wks by

at out daily

? religiosity

Orangeburg ER in Sh. Dep. - Dr. Hooker came

in - direct introduce himself

[He made no report] - pitcher

victim outwork - but could be a
victim

(38)

13

[bodily features?]

she didn't know who Hooker was
you're neurotic, psychotic, ill
Hooker - what should we do to her
→ hospital M.R.T. - stroke?

M.R.T. - WNL

Lewis - threatened to kill her
on drugs

pleasant
sneaky
bitch

went home to parents

lots of c/o about Lewis on & on, but
why didn't you IV.

she didn't think any ally would take Lewis on
she didn't need her for much.

she presents self as controlled by him
presents self as rel. helpless
tremendous amount of liquor

~~answer~~ Dr. Shriver of Columbia in whatshetell me
pleads + D.D.A.T.T.; split?; said / some
three days or state hosp - secreted / victims
mums - how Shriver & cond. day / M.R.T. / outside
St. Dept. sent case then often, but the
reports were against me
I for any ideas a time in the sand
and then got committed

went to 3 Rivers - Columbia, S.C.
Lewis showed up

outrage

~~break~~

39

④

Joan Conner - head - not a religious
Dyer Huges - relig. freedom - an accused Q -
teleevangelist

Mike Singleton - doubt will return
dated a bible
doesn't intend to date

Joan Conner - at Kyle TX - lives in my house
no body else.
best friend - only friend
no neg. contact
Buss - estranged - choose to
never be able to reconcile

over? production
SI. pres. speech
dramatic
defiant

Dr. Mobley - Q - never said I was
bipolar
had an inj. of Creosol j / wk @ 52 hrs

Dr. Dobbs - max 10-15 sessions - therapeutic
Asst. Living
circumst. (gives people
instructions
asked)

Ch. oldest of 3
Dr. Penny - Beaches

Amo Castor

Dr. W. Wright PhD.

bro - drug - red

Dr. Elmore H.H. - records.

Wife

If I feel it,
it's true

⑤

⑤

See rarely has. Quest. directly

& about herself see could change

To HTP in HTP

④

Dr. Davis Legal Cases 2013-2007

DEFENDANT'S
EXHIBIT#6
5/30/13
MRL

Attorney	Case 2007-2012	Date	Court City/County	Case #	Depo	Court
Randy Edwards, Attorney	Anna K. Salter, As administratrix of the Estate of Larry J. Salter, Deceased v. Terrence Lee Alley, M.D.	2012	Circuit Court of Jefferson County, AL	CV-2010-2691-RSV	X	
Mark Shirver, Attorney	Estate of Wacław James Constantine Jagiella	2012	Probate Court of Walker County	Estate No. 16,259		X
Jill Irvin, Attorney	Estate of Gary Crews	2012	Superior Court of Haralson County, GA	Estate No. 2538		X
Jill Irvin, Attorney	Estate of Gary Crews	2012	Probate Court of Haralson County, GA	Estate No. 2538		X
Clark Jones, Attorney	Matthew Jones, W04 - U.S. Army	2011	Fort Bragg, GA	Book of Enquiry	X	
Monty Todd, Attorney and James E. Parham, Jr. Attorney	Moore vs Palmetto Hospital	2011	Richland County Court of Common Pleas	Civil Action File No. 09-CP-40-2598	X	
Peter Lown, Attorney	J. Randolph Babbitt, Administrator. Federal; Aviation Administration, complainant, vs Zumarraga, Patricio	2011	Federal Court - United States of America National Transportation Safety Board Washington, D.C.	NTSB Docket No.: SE-19043 (FAA Case No. 2011-WA-91-0030)	X	
James Smeltzer, M.D.	GA Composite State Medical Board vs. James Smeltzer, M.D.	2011	GA Composite State Medical Board	GA Composite State medical Board vs. James Smeltzer, M.D.		X
Bobby Lee Cook, Attorney	Pierce Allen Yates, Jr. Plaintiff vs. Jo Ann Yates & Brewster L. Yates Individually & as Trustees of the Revocable Trust Agreement of Pierce A. Yates	2011	Superior Court of Walker County, State of Georgia	Civil Action File No. 08-CV-74667	X	
Charles Cauble, Attorney	State of GA. Vs. Ayna Monique Drayne	2010	Superior Court of Coweta County, State of Georgia	No. 2010-SUR-337		X
John C. Bradley, Jr., Attorney	James Sears as Personal Rep of the Estate of Phyllis Sears vs. Dan Pistone Psychiatric Medicine, Daniel N. Pistone, M.D., Southeast Pulmonary and Critical Care, LLC, and Michael B. Danenberg, M.D.	2010	In the Court of Common Pleas Sixteenth Judicial Circuit, York County, South Carolina	Civil Action File No. 08-CP-46-569	X	
Louis Levenson, Attorney	Georgia Binns, Executrix of the Estate of Wallace A. Binns, Deceased, Petitioner Vs. William H. Binns, Jr., Caveator	2010	Superior Court of Worth County, State of Georgia	CAFN: 2010-CV-106	X	

Dr. Davis Legal Cases 2013-2007

Attorney	Case 2007-2011	Date	Court City/County	Case #	Depo	Court
Howard W. "Trey" Reese, III, Attorney	Latrell Mobley, as Administratrix of the Estate of Effie Lasseter vs. Memorial Hospital of Adel, Inc. d/b/a Memorial Convalescent Center, Healthmont of Georgia, Inc. d/b/a Memorial Convalescent Center, Healthmont LLC d/b/a Memorial Convalescent Center, and Sunlink Healthcare, LLC	2010	Superior Court, Cook County of Georgia	Civil Action File No. 08-CV-15	X	
Thomas Cobb, M.D.	GA Composite State Medical Board vs. Thomas Cobb, M.D.	2009	GA Composite State Medical Board	GA Composite State Medical Board vs. Thomas Cobb, M.D.		X
Vaibhav Maurya, M.D.	GA Composite State Medical Board vs. Vaibhav Maurya, M.D.	2009	GA Composite State Medical Board	GA Composite State medical Board vs. Vaibhav Maurya, M.D.		X
Chip Benton, Attorney	Lancaster Hospital Corp. d/b/a Lancaster Recovery Center; community Health Systems, Inc.; Community Health Systems Professional	2009	Court of Common Pleas	C/A #08-CP-34-113	X	
Walter B. McClelland, Esq.	Elizabeth S. Carnahan and Phillip W. Kaplan, vs Metropolitan Atlanta Rapid Transit Authority and Frances Baylor	2009	Superior Court of Fulton County, Georgia	Civil Action # 2008CV156249	X	
Theodore G.G. Pound, Attorney	Roger Blasberg v Seymour Solodar, M.D. and Ridgeview Institute, Inc.	2009	State Court of Fulton Co., Georgia	Civil Action File No. 2006EV001385E	X	
Honorable Judge Amero	Bryia Lloyd Bull v Michelle McKinney	2009	Superior Court, Henry County	Civil Action # 03-CV-3021-C		X
Alan Meadors, Attorney	Georgia Board of Veterinary Medicine v James Lewis, DMV	2008	Macon, Georgia			X
John E. Haldi, Attorney	James Micheal Huey v. Probation Office Greeg Owen	2008	Cherokee County Habeas Corpus	Civil Action #08-CV-0896-EM	X	
Jonathan M. Rolnick, Esq.	Anthony Turner	2008	State Board of Workers Comp. State of Georgia		X	
Keegan Goodrich, Jones County District Attorney	The State v. Robert Danenberg	2008	Superior Court, Criminal Division, Jones County Courthouse	Case Number 9647		X
Keegan Goodrich, Jones County District Attorney	The State v. Robert Danenberg	2008	Superior Court, Criminal Division, Jones County Courthouse	Case Number 9647		X
James Potts, II, Attorney	Addie Jane Keys v Charter Behavioral Health System of Atlanta	2007	State Court of Fulton Co.	File 01A-87333-5	X	
Henry Grimal, Attorney	Elizabeth Murphy v Jefferson Pilot Communications Co. d/b/a/ WCSC news Channel 5 and Donald M. Feldman	2007	County of Charleston State of S.C. Court of Common Pleas	Civil Action No: 01-CP-10-1115	X	
Steve Harrison, Attorney	State of GA v Janey Reynolds Ray	2007	Superior Court of Dodge County	No. 06R-3725		X
William H. Haltom, Jr., Attorney	Jessica Edwards v. UHS Lakeside, Inc. Et al.	2007	Circuit Court of Tennessee for the Thirtieth Judicial District at Memphis	No. CT-002098-05 Div. VIII	X	