

Roderick English

Plaintiff

MS Andrews, RN
 Jane Wellness Health
 Manager ML Parker
 Warden: John B
 Mc CREE Vera C Conson
 Nurse Cebe
 Defendant

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MAR 16 2016

SC Court of Appeals

~~The South Carolina Court of Appeals~~
~~Appeal~~
 The South Carolina Court of Appeals
 Appeal
 CIA No. 1:13-2793-JFA

Motion To Request To
 Reappeal Motion of Dismissal
 Dismissal of CIA No. 1:13-2793
 JFA

History

1. Health Care Board Roger v. Columbia HCA
 of Central Louisiana supra At 236-237 (III)
 (c) (3) the HCQIA Executive committee to Revoke staff
 Privilege Hospital Care Quality Improvement Act (HCQIA)
 Afforded The Hospital Immunity SEE 42 U.S.C. § 11111(a)

(1). The Court of Appeals Reversed, holding That
 The Hospital WAS not Entitled to Summary Judgment
 on Its Immunity defense, because a genuine Issue
 of Material fact Remained As to whether It

Gave Dr McCREE Adequat notice of the Reason
 The proposed Revocation of his Staff privilege
 Davepart v Northeast Ga Medical Center, 237

GA. App 258, 256 S15 SE 2d 162 (1999). WE
 granted certiorari consider what constitutes a adequate
 notice under 42 U.S.C § 11111(a) (3). we can conclude That
 The forth the Reason for the proposed action In a
 date That the forth The Reason for The proposed
 Action In a date that the Reason be limited In
 The same term.

Argument 1.

Doctor ME CREE SHOULD HAVE PERFORMED
PLIANTIFF TO A HIGHER SPECIALIST IF DEFENDANT
DIDNT HAVE KNOWLEDGE OF AIDING MEDICAL
TREATMENT CHILDREN HOSPITAL V. STROKES
GROSSLY INCOMPETENT, INADEQUATE OR EXCESSIVE AS
TO SHOCK THE CONSCIENCE OR TO BE INTOLERABLE
+ A FUNDAMENTAL FAIRNESS MILTIER V. BEORN, 896 F.2d
848, 851 (4th Cir. 1990) (Citation omitted).

Argument 2.

ON 07/22/08 7:01 BY JOHN B ME CREE,
PHYSICIAN II ** ENCOUNTER: S3 Sick call 07/11/08 0:54
MC CONNICK COMD S> I HAVE A CESS UNDER MY THIGH
CLOSED TO MY BUTT, IT IS BIG AND IT'S TENDER AND
I HURT - I CAN HARDLY MOVE AROUND BECAUSE IT'S SWELLING
UP. Temp = 99.9 PULSE = 120 RESP = 24 BP = 130/88
WEIGHT = 175 WOUND = 0 LARGE BOIL SCROTUM AREA,
WITH SARASAWAQUEUS DRAINAGE, HAD
Paris full Docket # 15-ALJ-04-0012-AA

v. Conclusion
for the foregoing reasons the Plaintiff's

Proceeding below in Appeals Regarding Injunction
see §§ 14.3.330 and 14-3-450 § 15-3100.

Effect of stay of Action by Injunction
or statutory prohibition for the ORDERED.
Plaintiff's motion for settlement The court ~~denies~~
denies [Entry #94]. CASE 1:13-cv-02793-
JFA Document #: 103-1 DATE filed 04/10/2014
Prayer Requesting A Appeals Decision In Newly
Discovered Lately Evidence To CASE 1:13-cv-02793-
JFA

Discussion

A. Standard of Review

Defendant John McCREE STATE ~~MENT~~ AS PHYSICIAN II Doctor McCREE STATE
The plaintiff could have an Adverse reaction to the anesthesia which can be potentially fatal. There could also be damage to the muscle or possibly nerves in the plaintiff's leg as a result of the surgery. And there is also a risk of infection from the surgery. Because of these risk factors and the fact that the buckshot is not causing plaintiff any harm, in my opinion it ~~would~~ would not be appropriate to have surgery to remove the pellet. Plaintiff has complained of pain in his leg which he attributes to the gunshot wound. Based on my review of plaintiff's records and examination of the plaintiff, in my opinion if plaintiff is experiencing pain as a result of the gunshot wound, removal of the pellet would not alleviate this pain. Any pain is a result of the ~~gunshot~~ initial injury and damage caused by the gunshot and not because the pellet remains in his leg. Removing the pellet would not alleviate the pain and could possibly cause an increase of pain as a result of the surgical procedure to remove the pellet. Based on these facts, it is again my opinion that it would be inappropriate to perform surgery to remove the pellet at this time, which

② Standard Review
See 42 U.S.C. § 11212c Based on the Above Defendant
Was Not Entitled to Summary Judgment on Its
Immunity See English V. Andrews 1:13-cv-02793-JFA-
SVH

2 Conclusion And Recommendations

For the foregoing reason The undersigned
Recommends The Court ~~Equal~~ Review Case
Action 1:13-cv-02793-JFA where
Lately Discoveries There Had Been A Issue
Addressed To Doctor McCREE for Medical Aiding
And Assistant which Treatment Had Been ^{Recommended}
Delayed which ^{Medical} Malpractice ^{Did} not
Show In Case English V. Andrew Intill Lately
Discover Evidence. Inmate was not Required To understand
fully The Ramification of The Saranaceous Swelling
drainage or build up or delay of Indragosis And
Be put on notice The delay of Larger Boil In Innea
- Thight had Resulted In Injury Painfully Hemorrhoid
and constantly Bleeding from The Erector Youngu. South
Carolina Dept of Connection SE. App: 1999) 333 S.C.
714, 511 S.E.2d 413 And Re appeal And Brought
Back To Trial AS case 1:13-cv-02793 JFA SVH
First Begin. for Reason ~~of~~ Law state hospital
was not Intitled to Immunity to summary judgement
on Its defense In CIA English V. Andrews 1:13-cv-02793
- JFA-SVH ~~SEE~~ 42 U.S.C. § 11212

(a) (4). The court of Appeals Reversed, holding That ~~The~~ The
Hospital was not Entitled to summary judgement on Its
Immunity defense, because a genuine issue of material
fact Remained as to whether It gave DR McCREE
A adequate notice of the Reason The proposed Revocation
of his staff privileges Daveport V. North East GA

Officials in their official capacity are ~~be~~
The responsible agents of ~~the~~ Plaintiff. And Plaintiff
is Agent's responsibility as Guardian. And should
be treated as suit against the ~~represent~~ Legal Guardian.
As Reasonably Guardian.

Medical Center, 237 GA. APP 252, 256, 515 S.E. 2d 162

(1999) WE granted certiorari to consider what constitute

A dequate notice" under 42 U.S.C. § 14122(a) (3). WE

conclude That The forth The Reason for The proposed

Action In a date that the forth The Reason for the

Proposed action In a date That The Reason be

Limited In the 5 amc term Please Review findings

In case English v. Andrew 1:13-cv-02793 JFA-JVA

before A Extra ordinary Reason prevent the court

for finding for settlement That Is Law Issue

Rise for ~~the~~ Any medical compliant Requested settlement

Start At \$25,000

Roderick English

Plaintiff

v

Ms Andrews, RN Jane
WRECS's Health Manager;
Mr. Parker, Warden; John
B. McCREE Vera Cousins
RN William R. Byars, Jr.;
Nurse Cebalga
Defendants

~~The Supreme Court of~~

~~SC Court of Appeals~~
The South Carolina Court of Appeals
Appeal

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CERTIFICATE of Service

The under hereby certifies
That the ~~fore~~ foregoing response to Defendant
Motion for WARNING CASE CLOSED on 12/09/14
Document number: 142 was been served of
Defendant via United States Mail, Addressed to The
Defendant as follows:

Ms Andrews - RN Jane
WRECS's Health Manager; Mr. Parker, Warden;
John B. McCREE; Vera Cousins, RN; William
R. Byars, Jr.; Nurse Cebalga

S/ Roderick J English
Roderick J English

12th day of March 2016

Roderick English Inmate # 301504

Perry Correctional Institution

436 OAKLAWN RD

Pelzer South Carolina 29669

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PCI Mailroom

LEGAL MAIL

The South Carolina Court
of Appeals

Kenneth A. Richstad Clerk

Post office Box 11629
Columbia, South Carolina

29211

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THE DEPARTMENT OF CORRECTIONS HAS
NOT INSPECTED OR CENSORED THIS ITEM.
THEREFORE, THE DEPARTMENT DOES NOT
ASSUME RESPONSIBILITY FOR ITS CONTENTS.
PERRY CORRECTIONAL INSTITUTION
SC DEPARTMENT OF CORRECTIONS