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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

SC Court of Appeals APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Case No. 12-ALJ-17-0405-AP

Appellate Case No. 2014-001457

CareAlliance Health Services d/b/a Roper St. Francis Respondent,
Healthcare,

v.

South Carolina Department of Revenue, Appellant.

APPENDIX TO RECORD ON APPEAL

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INDEX

Volume I (pp. 1 - 490)

Official Record Pg.
Nos. Bottom Center

I. ORDERS

1. Order dated May 20, 2014
Re: Order 6
2. Order dated June 27, 2014
Re: Order Granting in Part and Denying in Part
Motions for Reconsideration 23
3. Order dated July 29, 2013
Re: Order Denying Motion to Proceed 27

II. DETERMINATIONS

1. Department Determination dated August 16, 2012 30

III. HEARING TRANSCRIPT

1. Opening Statements
By Roper's Counsel 47
By Department's Counsel 47
2. Pre-Hearing Matters
By Roper's Counsel 48
By Department's Counsel 48
Administrative Law Judge's (ALJ) Ruling 49
By Department's Counsel 49
ALJ's Ruling 50

By Roper's Counsel	50
ALJ's Ruling	51
3. Argument	
By Roper's Counsel	51
By Department's Counsel	75
4. Closing Arguments	
By Roper's Counsel	107
By Judge Robinson	110
By Roper's Counsel	111
By Department's Counsel	113
5. Question for Roper's Counsel from Judge Robinson	119
Response by Roper's Counsel	119
Response by Department's Counsel	123
6. Question for Department's Counsel from Judge Robinson	127
Response by Department's Counsel	127

IV. DEPOSITION TRANSCRIPTS

1. Brett M. Baker, M.D., dated June 25, 2013	131
By Department's Counsel	133
2. Brett M. Baker, M.D., dated July 2, 2013	135
By Roper's Counsel	138
By Department's Counsel	144
3. Charles Prescott Ferguson, dated March 29, 2013	150
By Department's Counsel	154

4. Melanie Hutcherson, dated May 8, 2013	192
By Department’s Counsel	195
5. John McCormack, dated May 8, 2013	208
By Roper’s Counsel	211
6. John McCrosson, M.D., dated April 25, 2013.....	218
By Department’s Counsel	211
7. John McCrosson, M.D., dated June 13, 2013	230
By Roper’s Counsel	234
By Department’s Counsel	225
By Roper’s Counsel	261
8. Daud Nawabi, M.D., dated June 14, 2013	266
By Department’s Counsel	269
9. Mary K. Pendergast, dated May 1, 2013, pp. 31, 49, 55 – 56	275
By Department’s Counsel	279

V. MOTIONS

1. Department’s First Motion for a Continuance dated June 20, 2013	284
2. Roper’s Motion for Summary Judgment and Memorandum in Support of Same dated August 26, 2013	286
3. Department’s Motion for Summary Judgment and Memorandum in Support dated August 26, 2013	365
Exhibit A – Sample Certificate of Medical Necessity	394

Volume II (pp. 491 - 806)

4. Roper's Amended Motion for Summary Judgment and Memorandum in Support of Same dated August 29, 2013	491
5. Roper's Memorandum in Opposition to Department's Motion for Summary Judgment dated September 6, 2013	585
6. Department's Reply to Roper's Motion for Summary Judgment	622
7. Roper's Reply to Department's Response to Roper's Amended Motion for Summary Judgment dated September 20, 2013	651
8. Roper's Motion to Exclude Affidavit of Steven Silverman and Memorandum in Support dated September 27, 2013	661
9. Department's Response to Respondent's Motion to Exclude Steven Silverman's Affidavit dated September 30, 2013	677
10. Roper's Motion for Reconsideration Under ALC Rule 29(D) and/or to Alter or Amend Under SCRCP Rule 59(E) dated May 30, 2014	698
11. Department's Notice of Motion and Motion for Reconsideration Pursuant to ALC Rule 29(D), ALC Rule 68, And to Alter or Amend Pursuant to Rule 59(e), SCRCP dated May 30, 2014	722
12. Roper's Response to Department's Motion for Reconsideration and to Alter or Amend dated June 13, 2014	736
13. Roper's Memorandum in Support of the Administrative Law Court Proceeding with a Hearing on the Issues not Appealed by SCDOR dated July 18, 2014	746

VI. AFFIDAVITS

1. Brett M. Baker, M.D., dated August 29, 2013	756
2. Charles Prescott Ferguson, dated August 26, 2013	758
3. John McCrosson, M.D., dated August 28, 2013	760
4. Mary K. Pendergast, dated August 23, 2013	762
5. Mary K. Pendergast, dated September 30, 2013	765
6. Steven D. Silverman, J.D., dated September 23, 2013	771

VII. OTHER MATERIALS AND DOCUMENTS

1. Department’s Letter to Judge Robinson dated September 25, 2013 775

2. Joint Stipulations of Fact dated September 27, 2013 777

3. Roper’s Proposed Order submitted November 12, 2013 781

4. Boykin v. S.C. Tax Comm’n, Civil Action No. 89-CP-02-590,
Court of Common Pleas, Aiken Co. (1989) 802

5. Letter from H. Wayne Unger of the S.C. Tax Commission to
Senator Rembert C. Dennis dated June 19, 1974 805

6. Certificate of Counsel807

APPENDIX TO RECORD ON APPEAL

VIII. SUPPLEMENTAL DEPOSITION TRANSCRIPT

1. John McCrosson, M.D., dated June 13, 2013 pp. 1, 29, 30..... 808

STATE OF SOUTH CAROLINA
ADMINISTRATIVE LAW COURT

CareAlliance Health)	CIVIL ACTION NO:
Services d/b/a Roper St.)	12-ALJ-17-0405-CC
Francis Healthcare,)	
)	
Plaintiff,)	
)	
vs.)	
)	
SOUTH CAROLINA)	
DEPARTMENT OF REVENUE,)	
)	
Defendant.)	
)	

* * * * *

VIDEOTAPED JOHN MCCROSSON, M.D.
DEPOSITION OF:

DATE TAKEN: June 13, 2013

TIME: 4:02 p.m.

PLACE: Roper St. Francis
125 Doughty Street
Charleston, SC

REPORTED BY: DENISE LAUDER
Registered Professional
Reporter and Notary Public

* * * * *

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1 BY MR. CARPENTER:

2 Q. If you know. Yeah. Okay.

3 A. I think the way that we do it is very
4 standard. I think sometimes people do it without
5 having this sheet that I created, et cetera, but
6 everyone has a schedule book and everyone
7 communicates with their rep. Everyone orders the
8 prosthesis in the same way after they've done the
9 trials. They say what sizes that they need every
10 place, you know -- in every operating room I've
11 been, you know, all around the United States.

12 Q. Okay. Are you in your practice audited
13 by any state or federal agency for compliance with
14 state and federal laws?

15 A. Yes.

16 Q. Okay. Has any agency that has audited
17 your procedures in any way found those procedures
18 to be deficient in the documentation of your orders
19 for prosthetic devices?

20 A. No.

21 Q. And that's all I need on that.

22 Are you familiar with the term
23 prescription?

24 A. Yes.

25 Q. Okay. What is a prescription as far as

1 you are -- your understanding?

2 A. An order by a medical professional, a
3 doctor or a licensed physician assistant; they can
4 also do some prescribing. But to simplify, it's a
5 doctor's order.

6 Q. Okay. Do you then in ordering
7 prescription devices give a prescription for those
8 devices?

9 A. Yes.

10 Q. And how do you do that?

11 A. By saying what the prescription is.

12 Q. As an orthopedic surgeon, are you
13 licensed to order an implant, orthopedic devices,
14 in the patients that you treat?

15 A. Yes.

16 Q. By whom are you licensed -- so
17 licensed?

18 A. The State of South Carolina Board of
19 Medical Examiners.

20 Q. Okay. Can medical -- can the -- can
21 the hip and knee replacement devices that you order
22 be ordered by your patients?

23 A. No.

24 Q. Have you ever had occasion to write a
25 prescription for a patient to take to a drugstore

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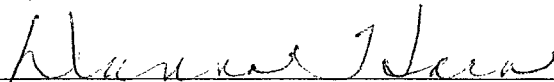
PROOF OF SERVICE

I the undersigned Administrative Assistant of the law firm of Nelson Mullins Riley & Scarborough, LLP, attorneys for CareAlliance Health Services d/b/a Roper St. Francis Healthcare, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: Appendix to Record on Appeal

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Donna Horn
Administrative Assistant

April 9, 2015