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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2016-CP-40-04463

Jean Watkins, as Personal Representative of the Estate of Mildred Watkins,

Respondent,

v.

Sterling Healthcare, Inc., Country Wood Nursing Center, LLC, and Guardian Resources, LLC,

Appellants.

RECORD ON APPEAL

VOLUME II

Kate Cappelmann
1180 Peachtree Street, N.E.
Suite 2900
Atlanta, Georgia 30309
(404) 348-8585
Attorney for Appellants

Jennifer R. Purdy
Popkowski, Callas & Shirley, P.A.
1430 Blanding Street
P.O. Box 7397
Columbia, South Carolina 29202
Attorney for Respondent

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Privilege Log for Employee Handbook

Document/Information Withheld	Title/Description	Reason for Withholding
Employee Handbook, ¶ 12	Financial Planning – discussion of reasons for wage garnishment/deduction	Confidential commercial information
Employee Handbook, ¶ 19	If You are Injured on the Job – discussion of medical services an employee will receive and how workers' compensation claims are handled	Confidential commercial information; private medical information
Employee Handbook, ¶ 20	Termination of Employment – discussion of notice to be given, termination process (voluntary and involuntary), and termination pay	Confidential commercial information
Employee Handbook, ¶ 21	Grievance Procedure – discussion of grievance procedure followed at Country Wood	Confidential commercial information
Employee Handbook, ¶ 22	Benefits – discussion of benefits available to employees, including paid breaks, medical insurance, jury duty pay, bereavement leave, other leaves of absence, Social Security and unemployment compensation, and FMLA leave	Confidential commercial information
Employee Handbook, ¶ 23	Rules of Conduct/Disciplinary Policies – discussion of disciplinary policies followed at Country Wood and conduct that will warrant disciplinary action	Confidential commercial information

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Employee Handbook, ¶ 25	Confidential Information – discussion of policy with respect to an employee's duty to protect confidential information	Confidential commercial information
Employee Handbook, ¶ 26	Agreement to Arbitrate – discussion of arbitration procedures and disputes as to which arbitration will apply	Confidential commercial information

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Facility Name

Administrative and Personnel Policies

Effective 7/1/99

Revisions
11/22/2006
3/26/08
5/11/09
4/1/2010
7/2010
9/13/10
9/21/10
12/20/10
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Introduction:

This Handbook is a summary of current policies, practices & procedures. The matters set forth in this handbook DO NOT serve as an employment contract and DO NOT provide any contractual rights to employees; employees are employed at the will of _____.
This facility reserves the right to change the matters set forth in this handbook from time to time & to review the employment performance and status of all employees based upon all relevant criteria. But not limited to, the matters set forth in this handbook. As policies change or additions are made, your copy will be up graded and supplemented as well

Any suggestions you may have either about this handbook or its provisions will be most welcome, since your input could help us improve our method of operation.

The Corporation:

Sterling Healthcare, Inc. owns and/or manages the nursing facility for which you work. The Corporate Office is located in Roswell, Georgia, and is staffed by the Corporate President, the Financial Officer and a secretarial staff.

Each Nursing Facility is managed by and directed by a fully licensed Nursing Home Administrator who reports directly to the President of Operations and/or Regional Manager. The Director of Nursing and all Department Heads report directly to the Facility Administrator. All other staff & nursing personnel report directly to their immediate supervisor.

The Policies & Procedures outlined in this handbook were developed by the Corporate Office with considerable input from facility Administrators. The policies contained herein are designed to be general in nature and yet flexible enough to meet the needs of most circumstances. However, specific interpretation may be required in order to address unique situations that may occur from one facility to another.

It should be clearly understood that only the corporate office can change, add or delete a policy. The individual facility is not empowered to do so. The facility may, under certain circumstances and with expressed permission of the Corporate Office, interpret certain policies to meet specific need.

I *Equal Opportunity Employer*

This facility is an equal opportunity employer. It is the policy, from recruitment through employment and promotion, to provide equal opportunity at all times with out regard to race, color, religion, gender, national origin, or age. Physical or mental handicaps will be considered only as they may relate to bona fide job requirements.

2. *Sexual Harassment Policy*

It is this facility's policy, as part of its continuing affirmative action efforts & pursuant to guidelines on sex discrimination issued by the Equal Employment Opportunity Commission, to protect & safeguard the rights of all employees to seek, obtain & hold employment without being subjected to sexual harassment or discrimination of any kind in the work place.

Sexual Harassment is a violation of Title VII of the Civil Rights Act of 1964, & it is against the policies of this Facility for any employee, to sexually harass another employee in any way including, but not limited to:

1.Making unwelcome sexual advances or requests for sexual favors a condition of an employee's employment, or

2.Making submission to or rejection of such conduct the basis for employment decisions affecting the employees, or

3.Creating an intimidating, hostile or offensive working environment by such conduct.

Sexual harassment does not refer to behavior or occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, that fails to respect the rights of others, that lowers morale or that interferes with our work effectiveness. If you are the object of such behavior, you are urged to tell the offender that his or her behavior is unwelcome.

Whatever form sexual harassment takes, it will not be tolerated by this Facility. Violations of the Facility's policy will result in disciplinary action which, depending upon the seriousness of the offense, may include oral or written reprimand, suspension, or termination of employment.

Any employee who believes that he or she has been the subject of sexual harassment is strongly urged to report the alleged act immediately. Reports of this nature must be made in writing (Revised 4/10/14) to any supervisor, to the facility administrator or to the Corporate Office.

Administrative & Personnel Policies

Our Purpose is:

To provide a home in which our guests receive the best possible medical, nursing & personal attention available anywhere.

Purpose of the Handbook is:

1. To establish a basis for impartial personnel administration for our Facility;

2. To provide the employer and employee with a ready frame of reference to policies & practices currently in use;

3. To let the employee know what is expected of him & what to expect or our Facility in return.

Our Administrative Services Will:

1. Endeavor to employ people best qualified for the job;

2. Ensure proper orientation of new employees;

3. Seek to provide security for all employees;

4. Establish wages comparable to those prevailing in the area;

5. Maintain working relations which are fair & free from bias & discriminations.

Administrative Policies & Procedures

3. Job Application & Hiring: Each job applicant will be expected to complete an application for employment, after which a screening process will take place. Screening will include a background check of previous employment, criminal background check, proper licensing & certifications check (when applicable), & other tests of the applicant's ability to perform the job for which he/she has applied.

Any employee not completing the 90 day orientation will have the cost of this deducted from their last paycheck

After being hired, each new employee will undergo a basic orientation process and an on-the-job training program. Each employee will be furnished a job description and a copy of this Administrative Handbook. Each employee will be required to sign a form stating that he/she has read and fully understands the Administrative Policies of this Facility. That statement will become a part of each employee's personnel file.

4. Physical Examination: It is the policy of this Facility that all employees, as per standards & licensure regulations, are required to have a physical and T.B./Tyne test when reporting for work and yearly thereafter.

All new employees will receive a T.B. test during their orientation period. This is furnished by the facility. Should you terminate you employment before the 90 day orientation, the cost of this test ($15.00) will be deducted from your last paycheck. Should any employee have and allergy to the T.B. test, it is the employee's responsibility to have a chest x-ray done on his/her first available day off.

All new employees are required to have a physical examination prior to or on their first day of employment. The cost of the physical is the responsibility of the employee; however, in consideration of monetary needs, this requirement may be waived at the sole discretion of the Administrator until after the employee's first pay day.

Physical and T.B. Test are then due annually, at the same time as their annual performance evaluations.
No annual merit raises will be granted until the physical and T.B. test are current. No increase over 3% will be given without Corporate approval (Revised 4/18/11)

5. Employee Personnel Records: Employee records are considered the sole property of the facility. At the discretion of the Facility Administrator, employees may be granted permission to inspect certain portions of his or her file, but in no event shall an employee be given copies of documents from his/her file. Any unauthorized disclosure of personnel records or the disclosure of any information contained therein shall be cause for termination of employment.

The Following Documents Will Be a Part of Each Employee's Files:

a. Application for employment;
b. Preliminary medical examination;
c. Past employment information;
d. Record of annual physicals, T.B. test and/or chest x-rays;
e. Performance rating;
f. Miscellaneous correspondence;
g. Attendance reports;
h. Acknowledgment of the Resident's Bill of Rights;
i. Signed job description;
j. Disciplinary Action, if applicable (within the past 12 months);
k. Records or Grievances, if filed;
l. Acceptance of Administrative Policies
m. Employer/Employee Agreement;
n. Current emergency information.. It is the responsibility of the employee to keep the business office notified of any changes in address, marital status, telephone number, number of dependents, and persons to contact in the event of an emergency.

. Each employee is responsible for his or her own transportation to work & for arranging baby-sitting services. Neither of these are acceptable excuses for being late or absent from work, & using these as excuses are grounds for termination of employment.

6. The Line of Authority (Chain of Command) outlined on the introduction page will be respected at all times.

7. Absenteeism & Tardiness: Punctuality & regular attendance are critical components of an employee's overall performance. An unsatisfactory resolution of a chronic tardiness (over 3/mo.) or absenteeism problem shall be cause for termination of employment.
(Revised 4/10/12)

Any absence or tardiness from work must be reported to the immediate supervisor as early as possible. In the case of a supervisor not being on duty, then the employee must speak to the charge nurse on duty or the person in charge of that department. This shall apply to all employees regardless of department.

Employees calling off for sick days are required to call each day they are sick and unable to work. Any employee missing 3 days without calling will be subject to termination. This rule applies to employees on extended medical leave, including FMLA. Being on a FMLA leave does not change the leave of absences procedures.

Upon returning to work, the employee must make an appointment to see the Director of Nursing (if employee is in nursing) or their supervisor if the employee is in any other department.

An employee absent (NCNS) more than one (1) days & does not have an excused absence shall be suspended without pay for three (3) days. A second offense could be cause for termination of employment as determined by the facility Administrator. (Revised 6/2/11)

Those employees calling in or not reporting to work for a scheduled weekend shall not be entitled to their next scheduled weekend off. Those employees failing to report for work the day before a scheduled PTO day, or the day after, shall forfeit one PTO day. Unscheduled PTO time will not be approved for the following days:
New Years Eve day and Day
MLK Day
Easter Sunday
Memorial and Fourth of July Day
Labor Day
Thanksgiving Day and day after
Christmas Eve Day and Christmas Day
PTO Time must be in increments of 4 hours
(Revised 4/10/12).

8. Orientation Period & Performance Review: Every new employee of this Facility is hired on an orientation basis for a ninety (90) day period. During this period of orientation evaluation, any sick leave / absences from work will be deemed to be unpaid. At the end of the orientation period, the new employee's performance will be reviewed and, provided performance has been satisfactory he/she will become a full time staff member with all benefits accrued from the initial date of employment. At this time the employee will be eligible for all insurance benefits. All PTO benefits shall accrue from the date of hire and are useable at the end of 180 full days. An employee may be discharged at anytime during the orientation period for any reason deemed necessary by the Facility Administrator. Evaluations are discussed with the individual employee by his/her supervisor at the end of the probationary period. At this time, the employee will be advised of both his/her strengths & weaknesses plus areas in which improvements should be made. The employee will be required to sign his/her evaluation, & this is a part of the permanent file. Evaluations are annually thereafter.

Each employee will receive an evaluation near the completion of one full year of service with the Facility. The purpose of such an evaluations is to define the employee's strengths & weaknesses and to determine the extent of competency. A written evaluation form, completed by the supervisor, is used to define the critical areas of performance. Depending upon the result of the written evaluation, a salary adjustment will be made commensurate with the established corporate policy. If at the time of the annual evaluation, performance is deemed to be unsatisfactory, the Facility, at its discretion, may:

1.) *Terminate the employee's; or*
2.) *Place the employee on probation for thirty (30) to ninety (90) days, at which time a second evaluation will be conducted. If performance is still unsatisfactory, his/her employment will be terminated. Written evaluations are the property of the Facility & will become a part of the employee's personnel file.*

9. The Work Week, Overtime Pay & Shift Hours:

a. The basic work week is defined as a seven (7) consecutive day period Depending on the facility this may start on Sunday or day designated by facility Full time is over 30hours per week. (Revised 12/9/13)

b. Overtime is defined as the time actually worked in excess of forty (40) hours in any one work week. Absences, such as vacation, personal leave, sick time or any other absence will not count as time worked for the purpose of determining overtime pay.

c. All Facilities must have corporate approval for all overtime. This includes Direct and Non direct care employee

d.. The following are the usual shift schedule for nursing employees

7am - 3:30pm
3:00pm -11:30pm
11:15pm - 7:15am

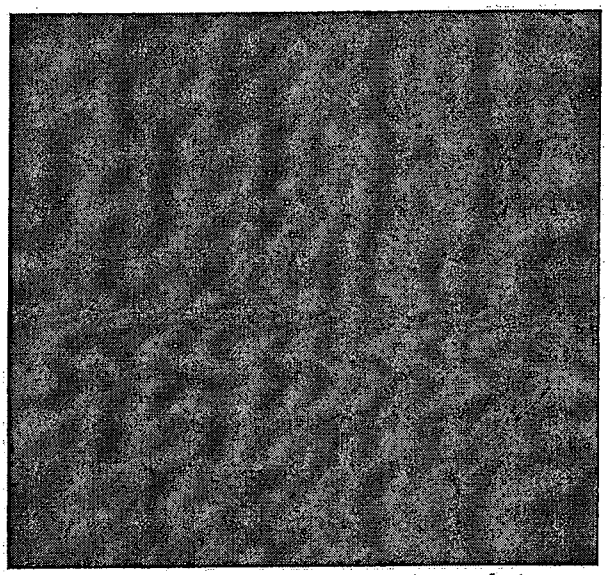
The foregoing hours are subject to administration approval & may vary from facility to facility. Each employee should confirm the shift scheduled at the facility which employees him/her. Breaks are paid time, and meals are non-paid time. Employees are not required to clock out for breaks, but are required to clock out for meal, regardless of staying or leaving the facility at that time. Employees may charge for meals through payroll deductions.

10. Employee Compensation: Individual rates of pay will be based on one or more of the following:

a. License /Certification;
b. Educational qualifications;
c. Experience;
d. Individual performance;
e. Seniority.
f. Full Time (32Hr to 40Hr/wk) or
g. Part Time (less then 32 Hr/wk)

Pay roll checks will be distributed two (2) times a month on the 7th or 8th and 22nd or 23rd at 2pm. If the pay day is on a Saturday, we pay on Friday, if on a Sunday we pay on Monday. The actual payday may vary at some facilities. Under no circumstances will checks be distributed before 2:00pm.

11. Outside Employment: It is the policy of this Facility that anyone hired on a full-time basis must consider this job his/her primary job. If an employee finds it necessary to work at a second job elsewhere, then it is the employee's responsibility to report that fact to the Administrative Office of that particular facility. Outside employment is permissible if, and only if, it does not interfere in any manner with the performance of the employee's primary job at our facility. Outside employment is prohibited if it involves a conflict of interest with the employee's duties & responsibilities, or involves the performance of duties which the employee should perform as part of his/her employment with this Facility. Decisions regarding outside employment are at the sole discretion of the facility Administrator, after careful evaluation of all of the foregoing.



13. Fire Prevention: Fire rules & regulations have been prepared & are kept current for each of the nursing facilities. Employees are to become familiar with these regulations & immediately report conditions which they feel are not conducive to the prevention of accidents. -All of our facilities are considered nonsmoking facilities, and all employees are expected to abide by this rule. Certain areas have been designated by the facility administrator for resident smoking areas, employees are expected to smoke on the outside the facility at designated area and maintain this area clean.

14. Dress Code: Nursing personnel are expected to wear clean neat "scrubs" or white uniforms.(Revised 7/30/14) Fingernails should be neat, short and not be blood red in color. White closed shoes are required. Dietary and Housekeeping personnel are expected to wear colored uniform type outfits. (scrubs may be considered). Office personnel are expected to wear professional business like attire (office casual is acceptable). All employees are expected to be neatly dressed & well-groomed at all times.

No visible tattoos, body piercing limited to 2 earrings per ear. Earrings are to be neat and no longer then ½ inch (allowing for no patient contact, for employee personal safety) At every facility, dress must be professional.

All employees are expected to wear visible name tags. The facility will furnish the first name tag, but any replacement tag will be the responsibility of the employee.

15. Employment of Family Members: This Facility allows the employment of qualified family members & relatives of employees. However, the facilities should not employ an immediate family member in the same department on the same shift as the employee. Immediate family members may be employed in the same department but on a different shift, or on the same shift but in a different department. The employment & placement of a family member is done at the discretion of the facility Administrator, with Corporate approval, then the decision is final.

16. Supervisor-Definition of: A supervisor is defined as any person having the authority to direct, hire, fire & set work hours, with direct permission of the facility Administrator.

17. In-Service Days: All employees are required to attend five (5) mandatory in-service training days per year. They are as follows;

- *a. Confidentiality of Resident information;*
- *b. Residents' Rights and Dignity; (this is required quarterly)*
- *c. Fire & Safety; (this is required twice a year)*
- *d. Accident Prevention; and*
- *e. Infection Control.*

CNA's are required to attend sufficient in-service training to ensure the continuance of their certifications, per federal regulations.

18. Policy on Substance Abuse: It is the policy of this facility to maintain the work environment free from the effects of drugs, alcohol, or other intoxicating substances. Compliance with this policy is made a condition of employment

a. This facility is in compliance with the Rehabilitation Act of 1973 & the Drug Free Work Place Act of 1988 in that we offer equal employment opportunities to qualified alcoholic and/or drug addict applicants. QUALIFIED shall mean those applicants who are undergoing rehabilitative programs and/or whose current use of alcohol or drugs does not impair his/hr performance or cause a direct threat to property or the safety of others.

b. All employees are judged on their ability to perform their assigned tasks in a safe, orderly & efficient manner.

c. Any employees reporting to work under the influence of alcohol, drugs or other intoxicating substances will not be permitted to work his/her assigned shifts, or should an employee be discovered under the influence of alcohol, drugs, or other intoxicating substances while on duty, the employee will be relieved of his/her assigned tasks & asked to leave the premise. Any employee suspected of being under the influence of alcohol, drugs, or other intoxicating substances will be asked to submit a urine/blood screening.

d. Documentation of any & all of the foregoing incidents must be made by the Supervisor/Charge Nurse, & a copy of the documentation shall be made a permanent part of the employee's personnel file.

e. Any employee bringing illegal or un-prescribed drugs and/or alcoholic beverages on the premises, or using, selling, or dispensing such items on our premises will be subject to disciplinary action up to & including termination of employment.

f. Any employee who must use a prescribed drug or narcotic during his/her assigned shift must report such information to the Director of Nursing & must provide the container with issuing pharmacist's label identifying the drug & other required information. The purpose of this is for the Director of Nursing to determine whether the effects of the drugs will pose a safety risk for the residents, employees, coworkers, and/or affect the employee's job performance.

g. Should the Director of Nursing or the Administrator determine that is unsafe for the employee to perform his/her assigned task,

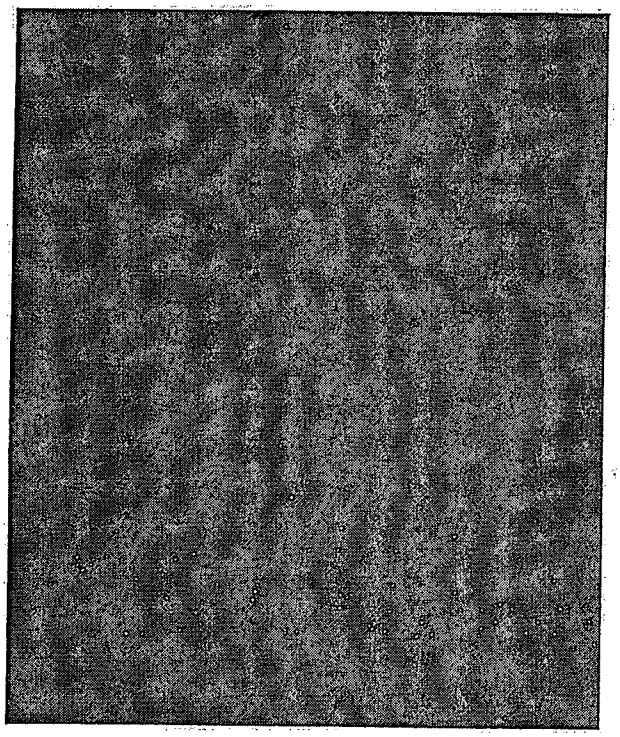
the employee may be temporarily reassigned to other duties or permitted a leave.

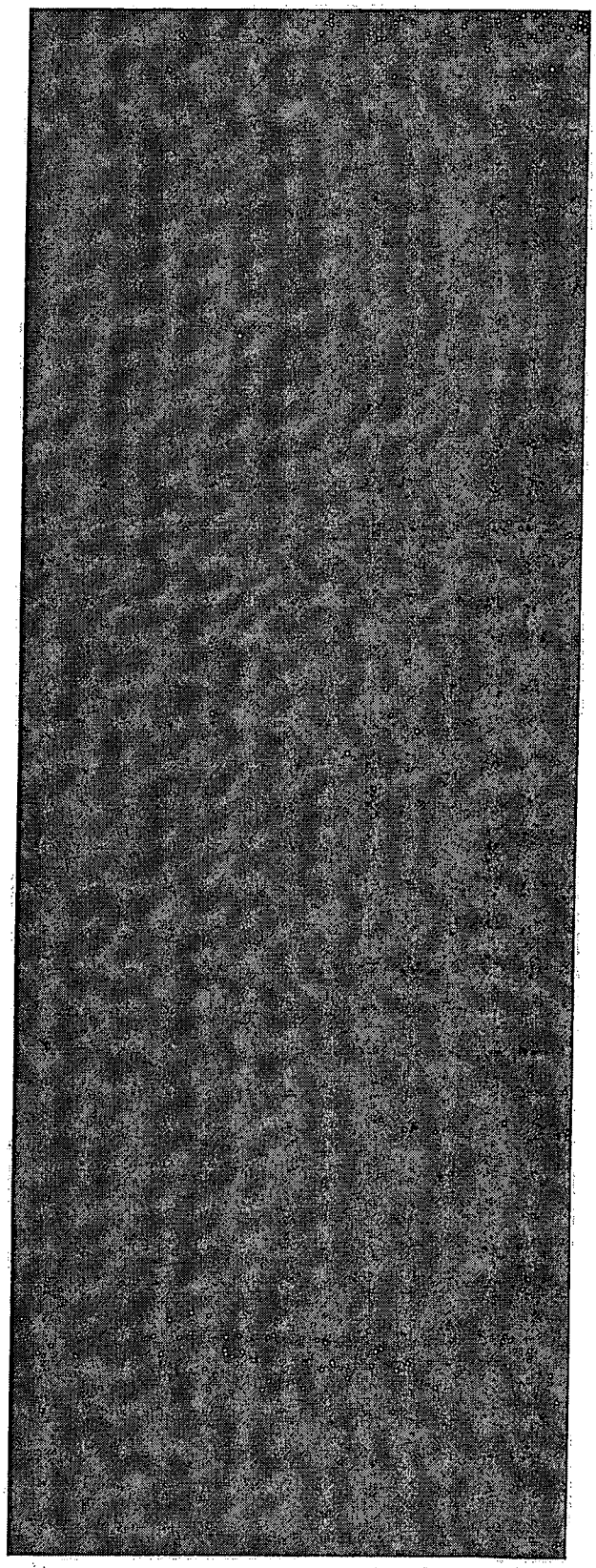
h. Should any of our employees develop a problem with alcohol or drug addictions, our facility will assist the employee by referring him/her to appropriate clinics if necessary & permit the employee to take a medical leave, which is defined later in this handbook

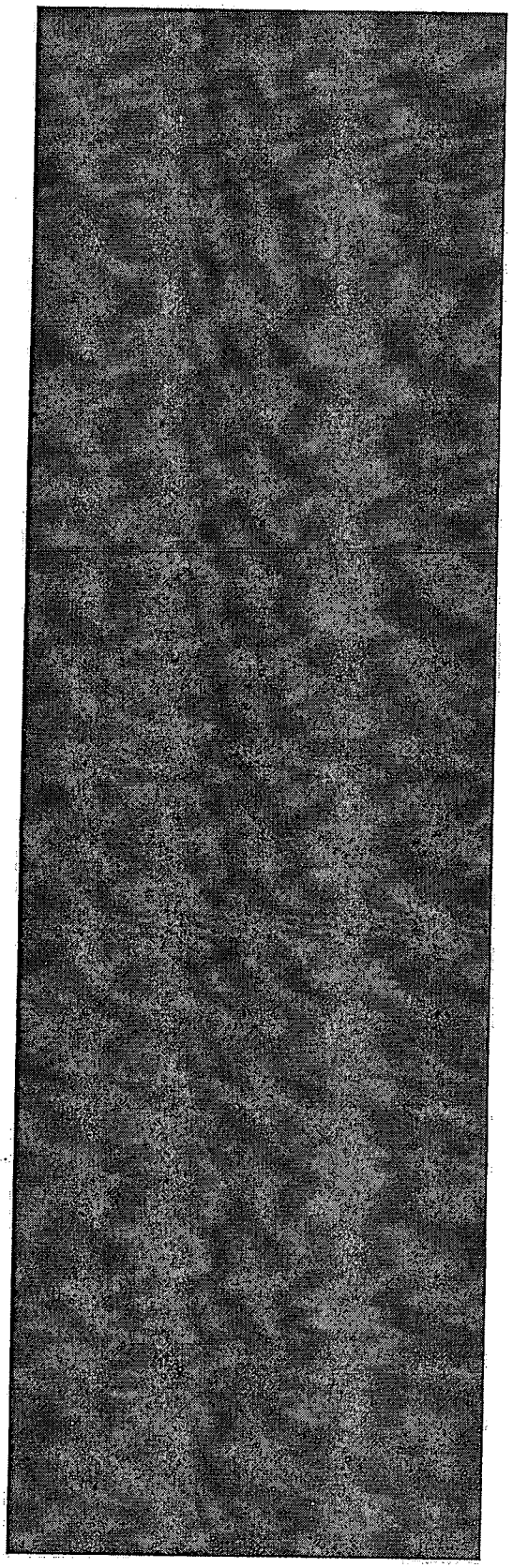
i. Any employee who is convicted of any violations of any criminal drug statute must notify the Administrator of such convictions within five (5) days of the convictions. A conviction includes any finding of guilty (including any agreed to by the employee) or plea of no contest and/or any imposition of a fine, jail sentence, or other penalty.

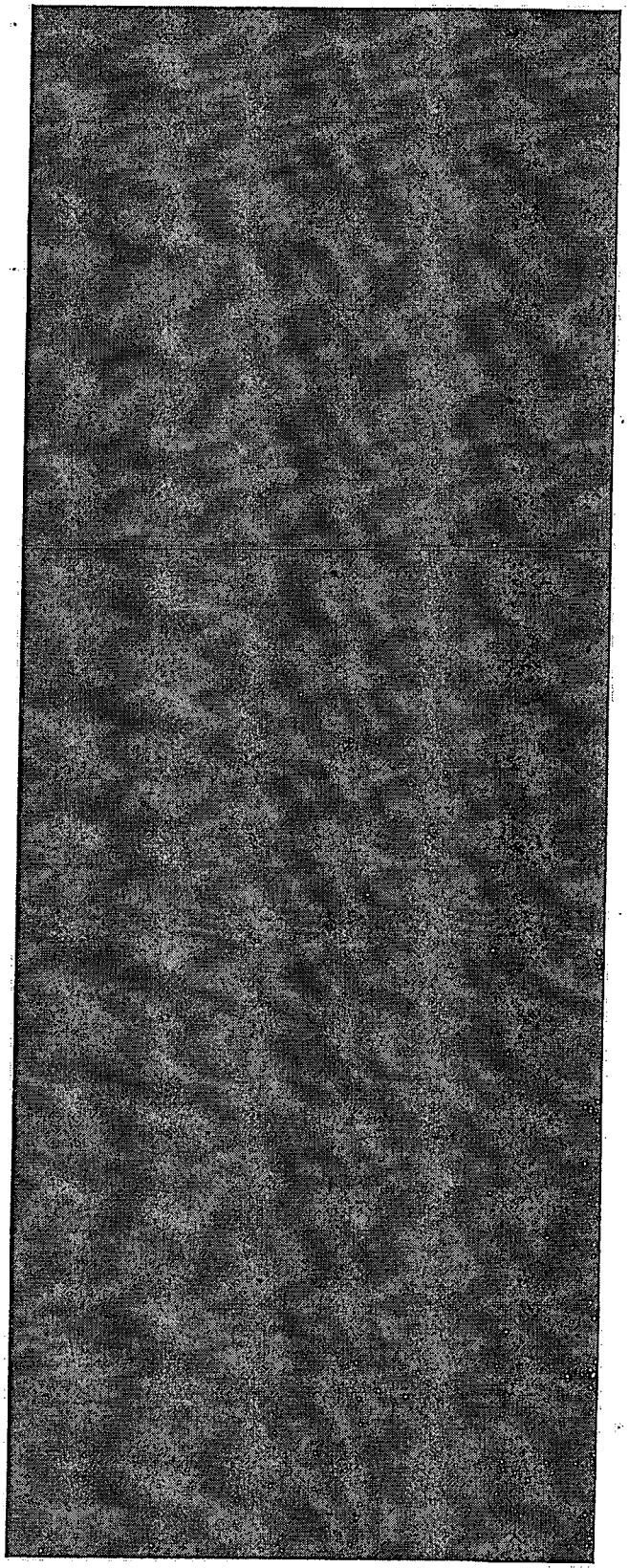
j. All incidents involving alcohol or drugs among our employees must be reported to the facility Administrator.

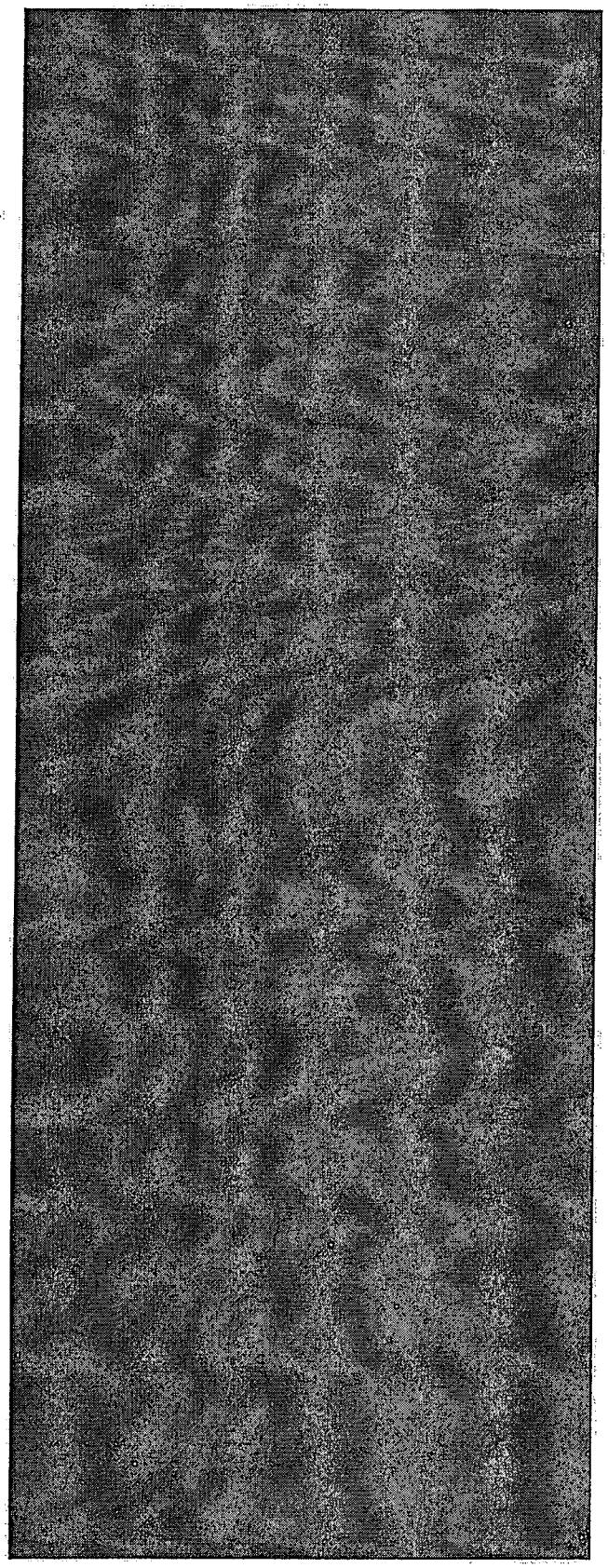
k. The Facility reserves the right to conduct random drug & alcohol testing of its employees.

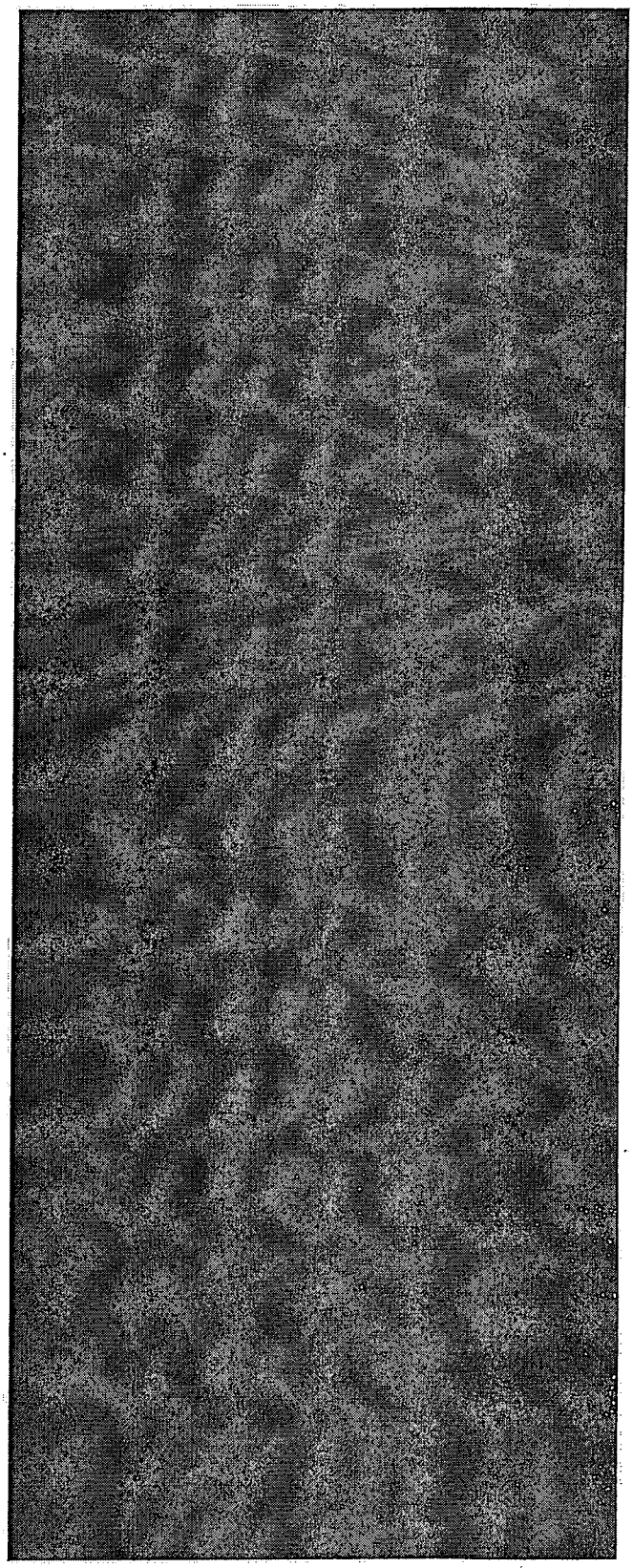


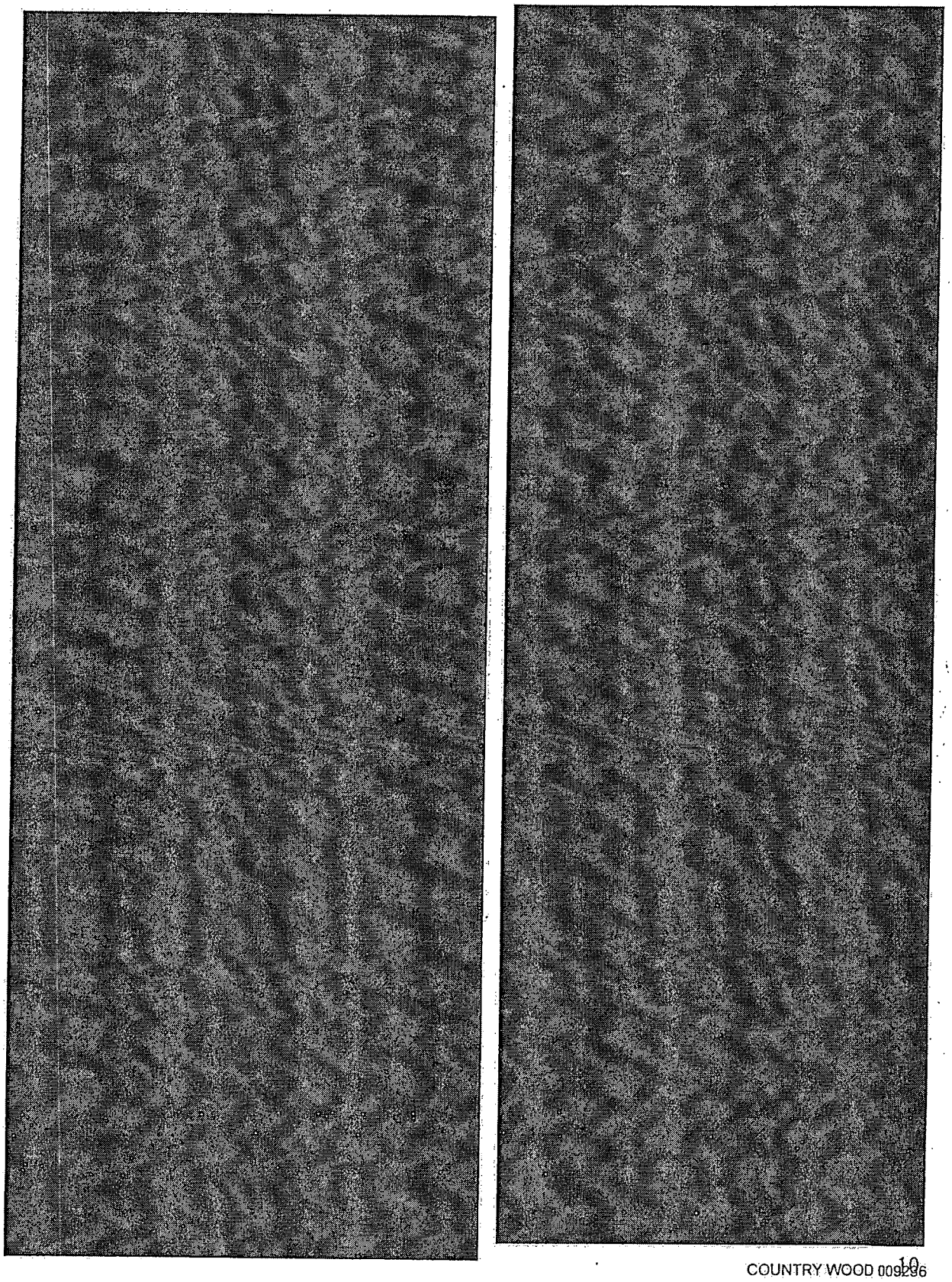


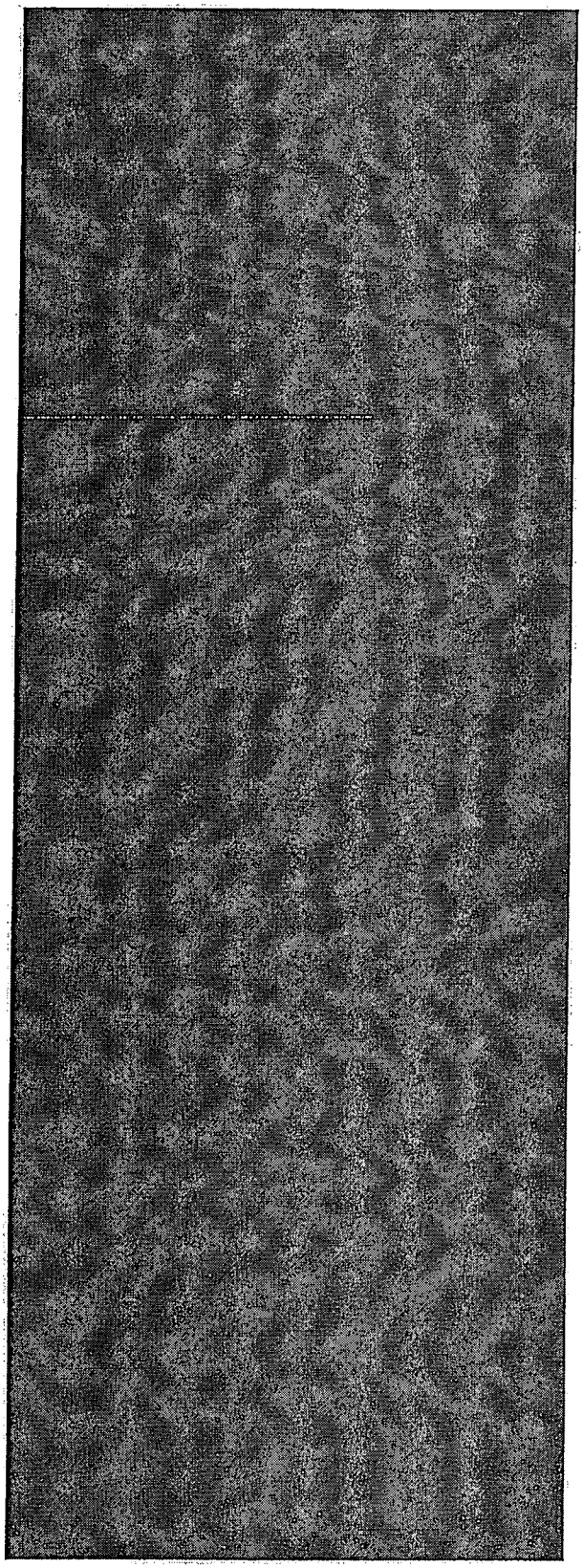


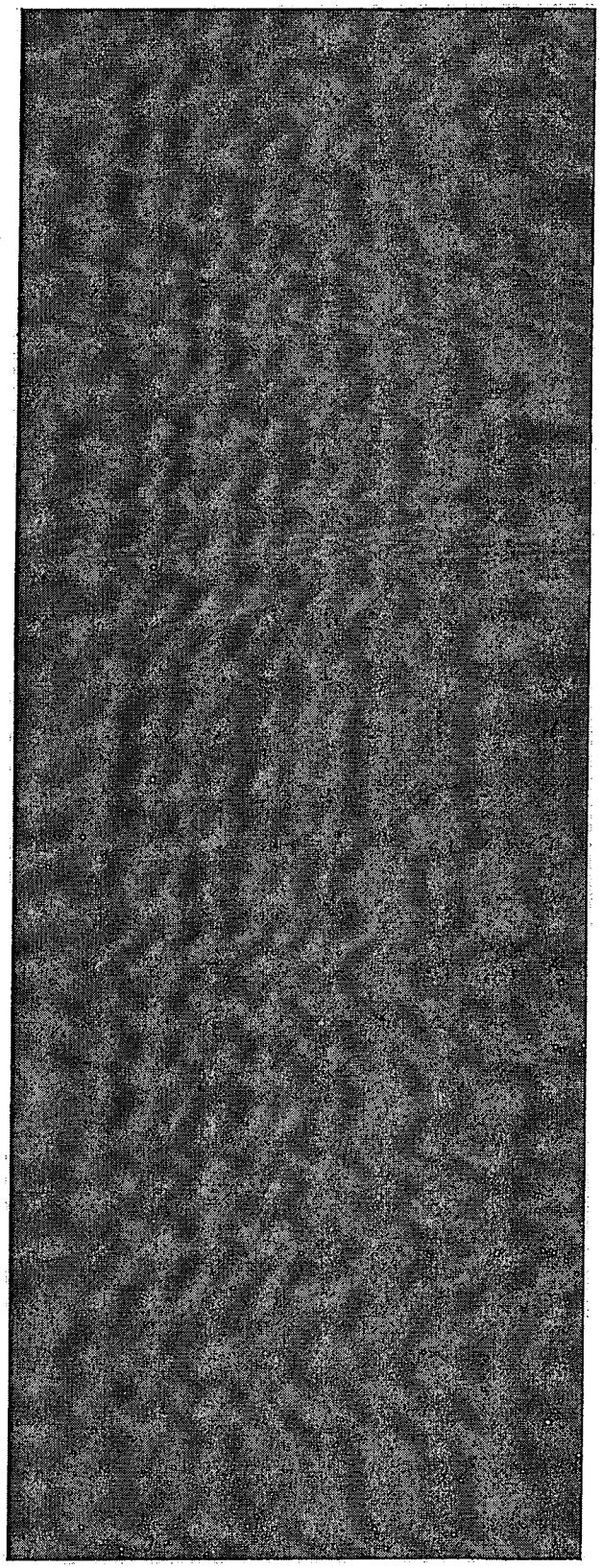


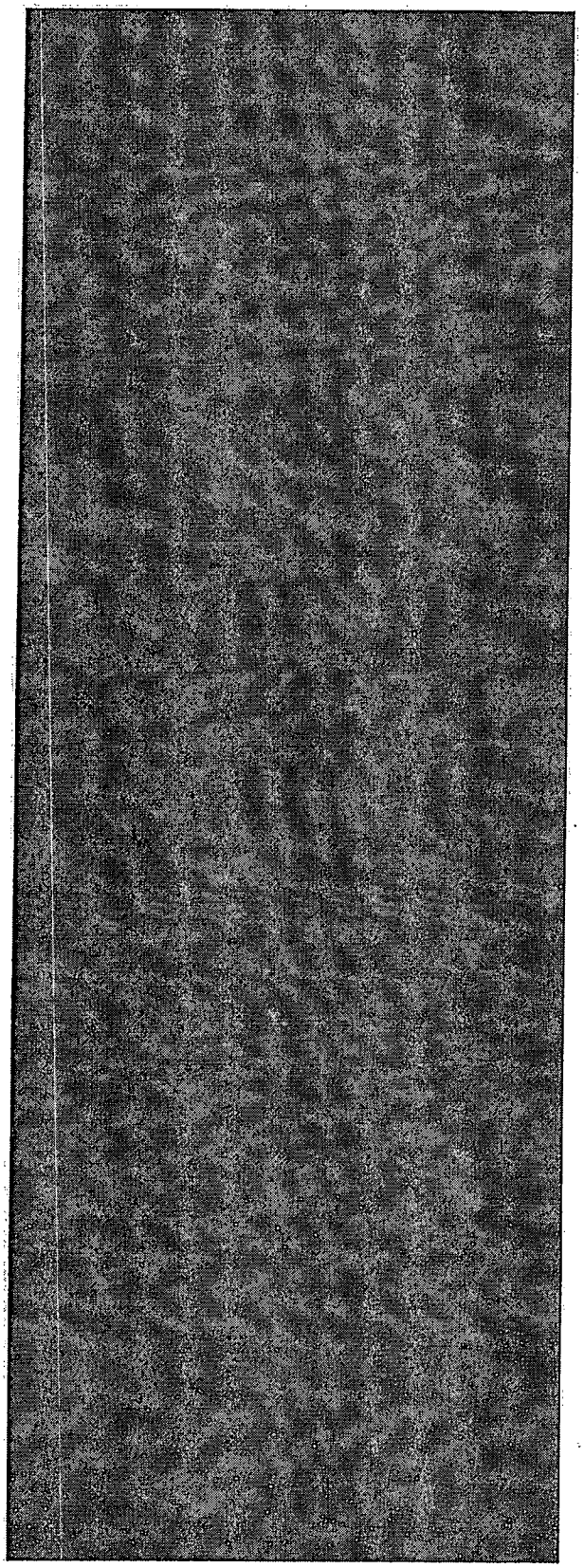


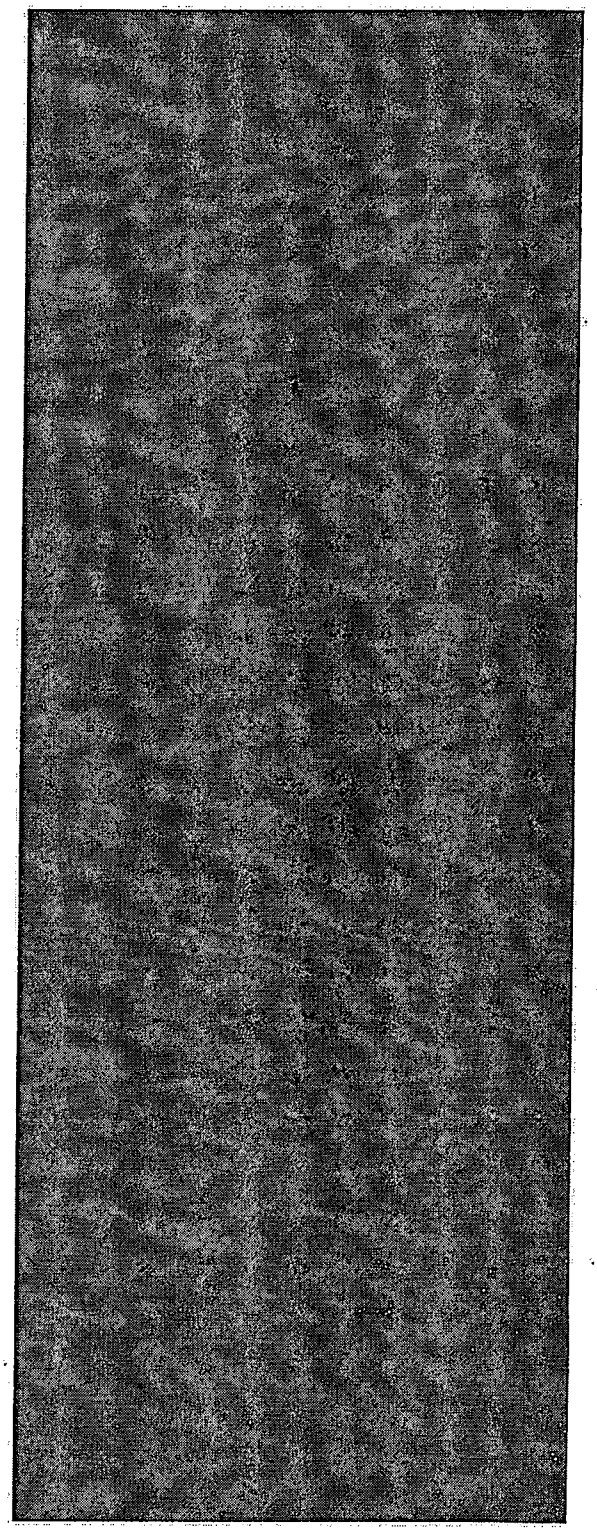


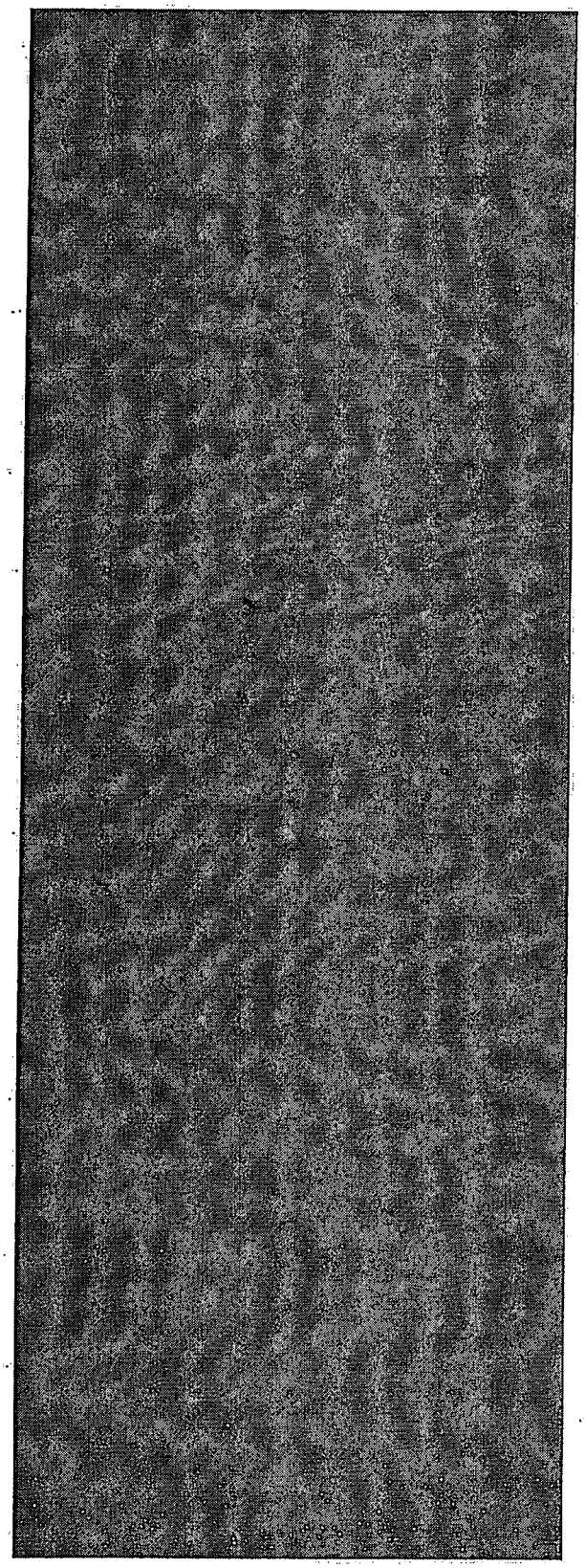


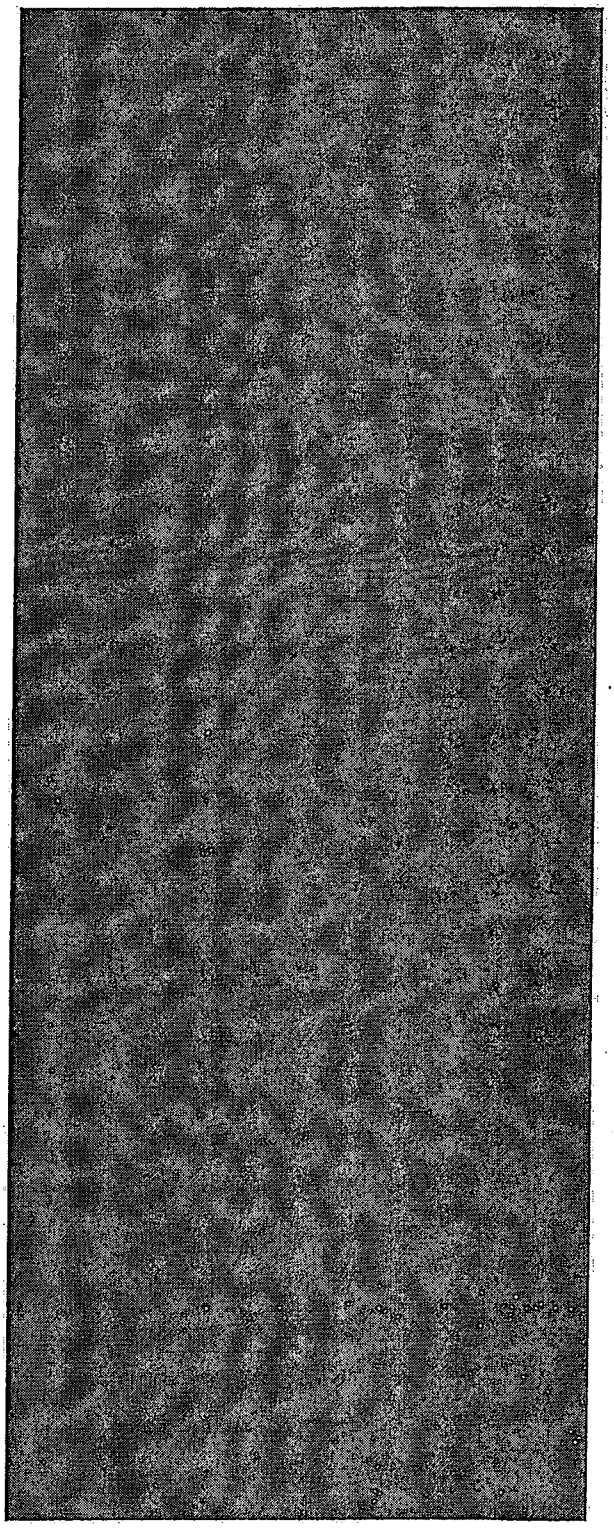


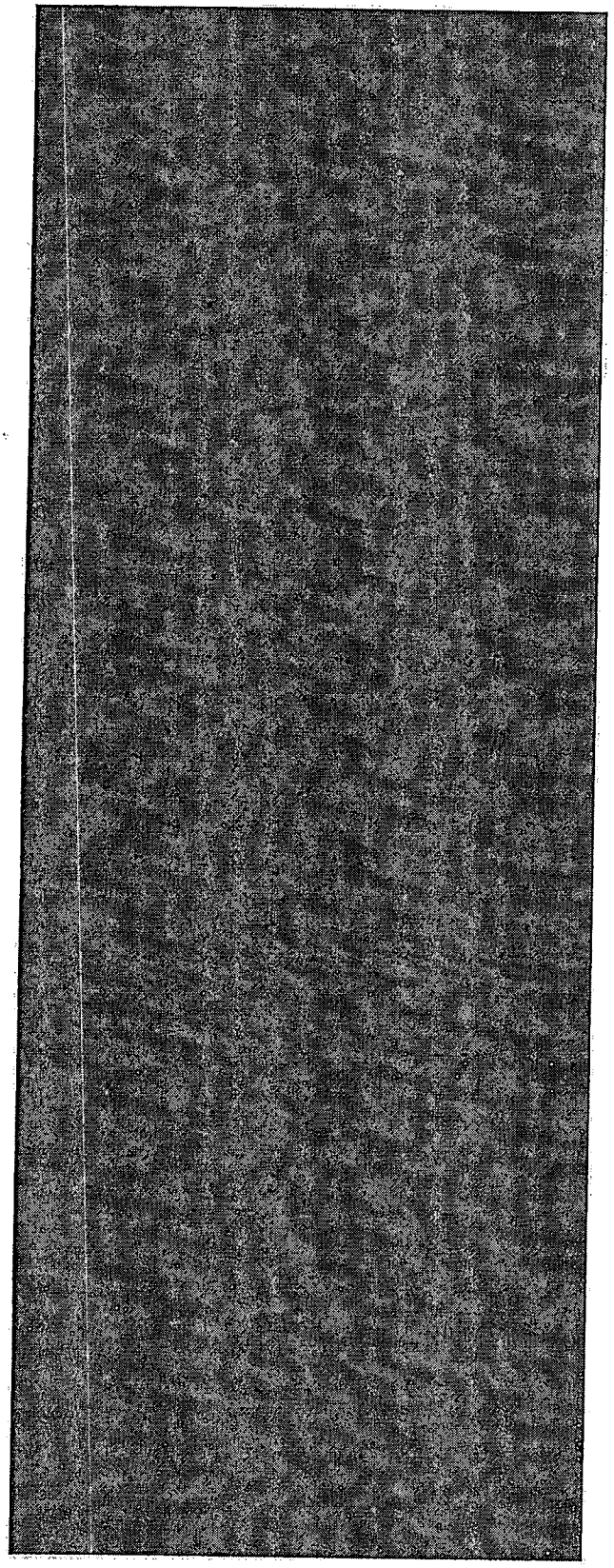


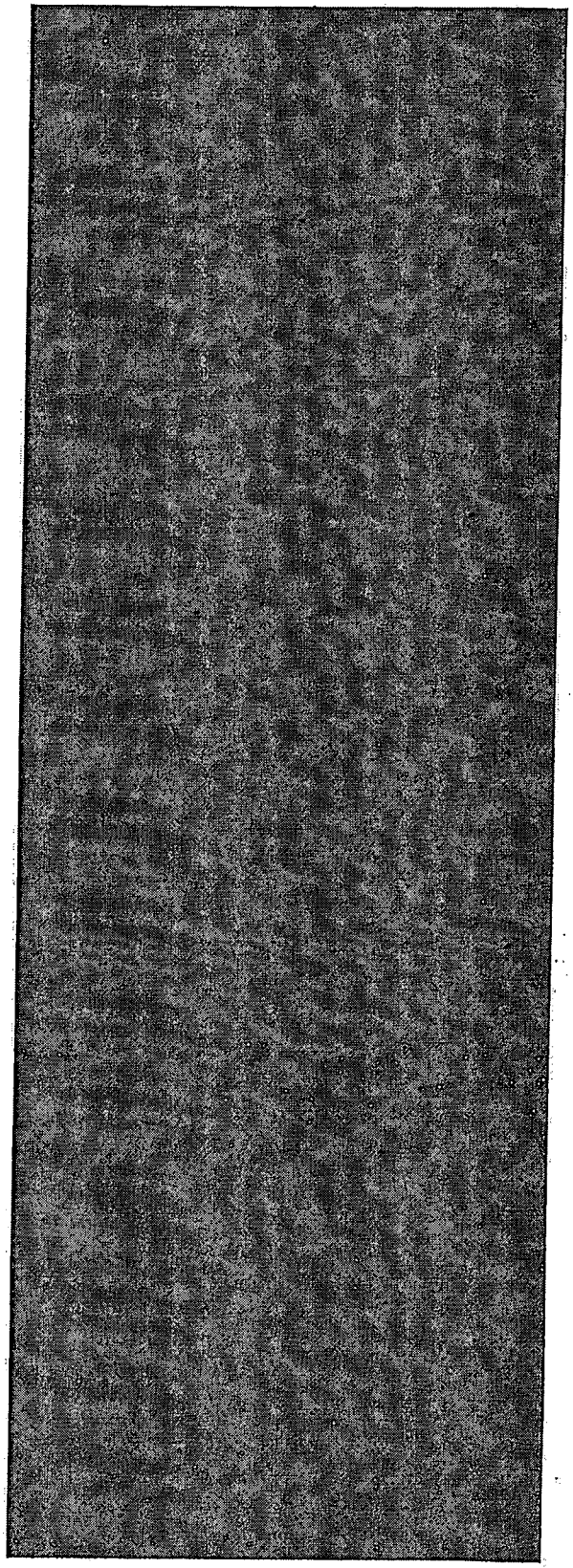












[redacted]

[redacted]

24. Infection Control

A. Policy: It is the policy of the facility to protect the health & welfare of its residents and employees. Accordingly, the following policy will be in effect for new employees and/or applicants who have or are suspected of being infected with HIV (including AIDS, AIDS Related Complex, & asymptomatic carriers of AIDS.

B. Applications for Employment: Persons offered employment are required to complete a health-screening questionnaire which shall include a question as to whether or not the applicant suffers from or is susceptible to any immunity disorder.

Persons diagnosed with immunity problems may be considered for employment the same as any other applicant, based on his/her experience, qualifications & ability to perform the job for which he/she has applied. Persons diagnosed with immunity problems may be required to obtain medical clearance from his/hr personal physician. The Infection Control Nurse will provide instructions if this should become necessary.

Applicants for employment with confirmed or suspected infections diseases other than AIDS shall be considered for employment as outlined.

C. After Employment:
Reasonable efforts will be made to permit facility personnel diagnosed as having the HIV infection to continue to perform his/her assigned duties unless, however, he/she is unable to perform the essential functions of the position or the performance of those essential functions would endanger the health, welfare, or safety of the individual, facility resident, or other employees. In those cases, the facility reserves the right to reassign the infected individual to a position which he/she is able to perform & that would not pose a significant danger to the health, welfare or safety of the individual or others in the facility. In determining the significance of the danger posed, the facility shall consult public health officials, as well as, appropriate guidelines as may be published by public health authorities concerning the following:

1. The nature of the risk (how the disease is transmitted);

2. The duration of the risk (how long is the carrier infectious);

3. The severity of the risk (what is the potential harm to third parties); and

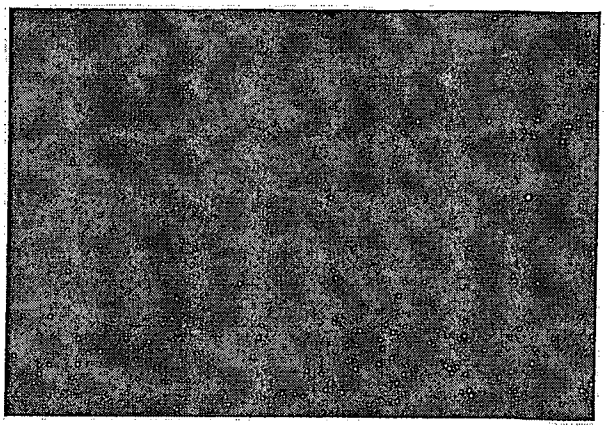
4. The probabilities that the disease will be transmitted & the varying degrees of harm it will cause. The foregoing decisions will also be based on considerations of the reasonable accommodations that can be provided to eliminate any substantial risk. These determinations will be made on a case-by-case basis.

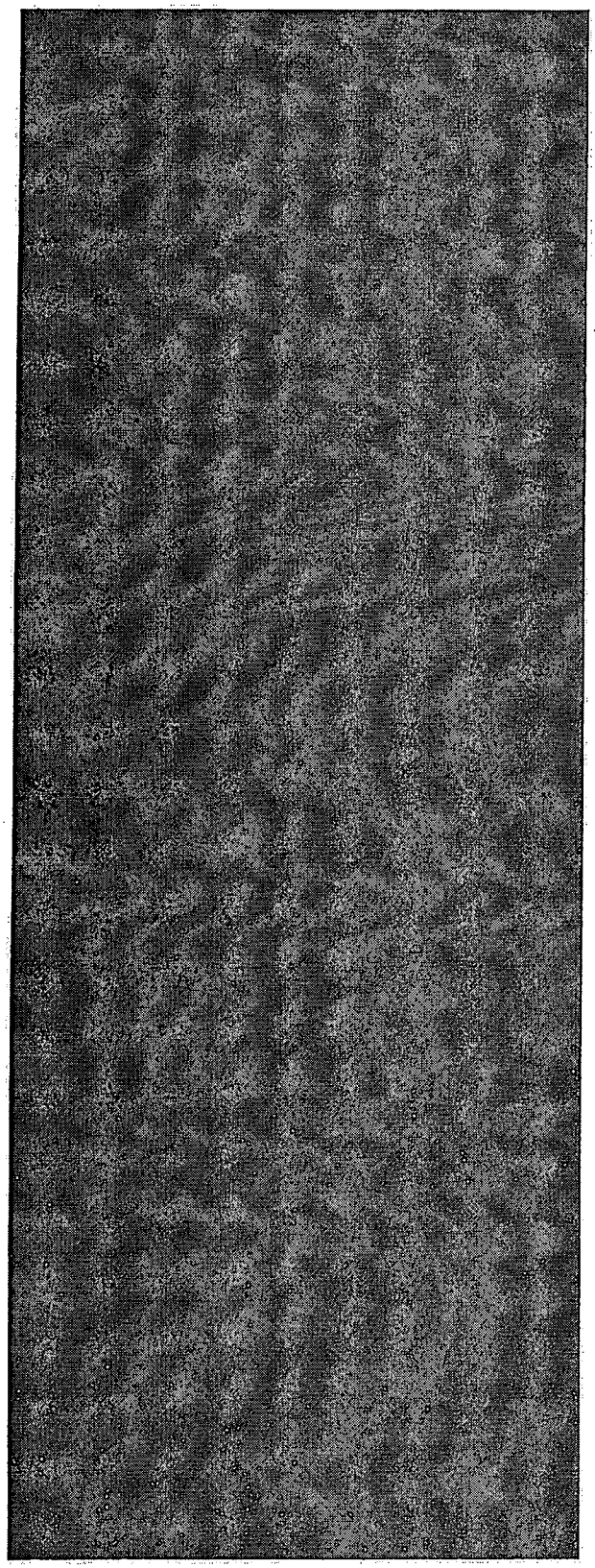
D. Confirmed cases of HIV infections in facility employees shall be reported immediately to the Infection Control Nurse, so that an immediate response regarding the health & education of other employees & residents can be started. The information shall be maintained in a confidential manner, & it shall be disclosed only to persons with a demonstrated need to know.

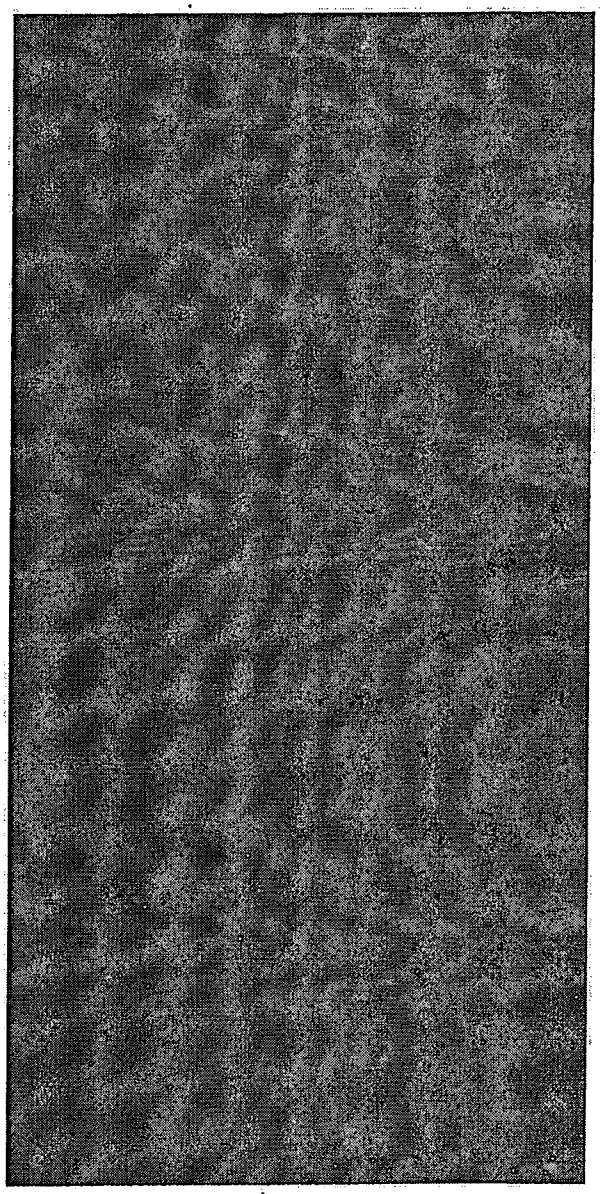
E. Employees who believe that they have been exposed to the body fluids of an individual with HIV infections shall immediately report this information to the Infection Control Nurse for evaluation of the need for appropriate testing & treatment. If an individual is suspected of having AIDS & refuses to consent to appropriate testing, the Infection Control Nurse will consult with the employee's physician regarding testing and/or treatment. Should the employee refuse testing and/or treatment, that employee will be considered to have voluntarily terminated his/her employment with the facility, for the protection of residents & staff.

F. Facility employees who refuse to work with other employees or resident either suffering from or suspected of having HIV infections will be referred to the Infection Control Nurse. The Infection Control Nurse will then provide these employees with the latest information safeguards against transmission. Facility employees who have a reasonable basis for refusing to work with those suspected of having or suffering from HIV infections (pregnancy or chemotherapy recipients) may be offered a temporary change of positions, if such is available.

G. Facility employees suffering from HIV infections contracted during their course of employment will be eligible for employee benefits, such as disability and/or workers' compensation, if such coverage is then available.







Employee Disclaimer

This Company: (facility name)

_____

1. *Hires all employees on an "at-will" basis*

2. *Each person's employment is for no specific term*

3. *The employer reserves the right to terminate the relationship at any time.*

4. *Nothing in the Employee Handbook (Administrative and Personal Policies) changes this at-will relationship, guarantees you a benefit, creates a contract of continued employment for a specified term, or any contractual obligation that conflicts with the (Employer's) policy that the employment relationship, with its employee is at-will.*

5. *No representative of the Employer other than an Employer executive has the authority to enter into any agreement for employment for a specified duration or to make any agreement for employment other than at-will . Any such agreement that changes your at-will employment status must be explicit, in writing and signed by both the Employer executive and you.*

6. *This facility reserves the right to make additions to any provisions in this handbook (Administrative and Personal Policies)*

7. *All verbal promises given to an employee do not take effect unless delivered in writing.*

8. *Only the Corporate Office or the Facility Administrator has the right to issue a written modification of this "at will policy"*

Employee acknowledgment

1. *This is to state that I have been made aware of the, (Facility)*

_____

"at will" employment disclaimer

2. *I have received the employee Handbook (Administrative and Personal Policies)*

3. *I have received a copy of this employment disclaimer sheet.*

4. *I am aware that a copy of this employee acknowledgment will be placed in my personnel folder.*

5. *I am aware that if I terminate my employment before the end of my 90 days orientation I will have the cost of my background check and TB testing deducted from my last paycheck.*
(Revised 9/21/2010)

Signature: _____

Date: _____

Facility Witness: _____

Title: _____

Date: _____

EXHIBIT 15

MEDICA
MEDICARE 19 NOV 09
NOLA

Sterling Healthcare

16 NORCROSS STREET
SUITE 100
ROSWELL, GEORGIA 30075
TELEPHONE: 770-993-4000
FAX: 770-993-9014

November 3, 2011

WPS Medicare Provider Enrollment
3333 Farnam Street
Suite 700
Omaha, NE 68131

Re: CountryWood Nursing Center
Provider # 42-5370

To Whom It May Concern:

I have included the CMS-855 Revalidation Medicare Enrollment application for CountryWood Nursing Center, Inc. located in Hopkins, SC as well as confirmation of payment.

If you have any questions or need further information please do not hesitate to contact me at (770) 993-4000.

Thank you,

Wendell Phillips
V.P. of Operations
Sterling Healthcare

CMS
CENTERS for MEDICARE & MEDICAID SERVICES

Medicare

November 19, 2011

Mr. Wendell Phillips
CountryWood Nursing Center
1645 Ridge Road
Hopkins, SC 29061-8432

ISSUE: Provider Enrollment Application
Provider Number: 42-5370 CountryWood Nursing Center

We received your Medicare enrollment application(s) on November 9, 2011. We are closing this request and returning your application(s) for the following reason(s):

_____There is not a fully completed Section 1A with Medicare provider number and NPI number listed.
_____The application contains a copied, stamped or digital signature in Section 15 and/or 16.
_____The signature on the application is outdated; it must be dated within three months of the application being received.
_____The 07/2006 version of the CMS-855A application or later was submitted; need a 02/2008 version.
_____There is not an Enrollment Record in PECOS and/or there has not been an 855A submitted in the past 5 years; you must file a full application to revalidate.
X **The application was sent to the incorrect contractor. You will need to send your application to the Part B carrier _____ or correct Audit Intermediary Palmetto GBA 11201.**
_____The incorrect application was submitted (i.e. CMS-855B was submitted to a fiscal intermediary).
_____An old or new owner in a CHOW submitted the application more than 3 months prior to the anticipated date of sale.
_____The application for an additional location was received more than 3 months prior to the anticipated date of move.
_____The CMS-855A is not needed for the transaction in question. Note reason_____
_____A CMS-855A is not needed when the sole purpose in submitting is to enroll in Medicaid.
_____The provider submitted a new enrollment application prior the expiration of the time period that the provider is entitled to appeal the denial of its previously submitted 855A.
_____The web-generated application does not appear to have been downloaded off of the CMS Web site.
_____The application was not mailed in (i.e. it was faxed or e-mailed) or the application was completed in pencil.
X **Other: Returning due to this Application needs to be submitted to Palmetto GBA Contractor 11201 Part A Provider Enrollment (AG-331) P O Box 100144 Columbia, SC 29202-3144.**

Providers and suppliers (except DMEPOS suppliers) can enroll in the Medicare program using either the:

1. Internet-based Provider Enrollment, Chain and Organization System (PECOS). To apply via the Internet-based PECOS, go to http://www.cms.hhs.gov/MedicareProviderSupEnroll.

2. Paper application process. To apply by paper, download and complete the Medicare enrollment application(s) from the Centers for Medicare & Medicaid Services (CMS) Web site at http://www.cms.hhs.gov/MedicareProviderSupEnroll. DMEPOS suppliers that would like to apply should download and complete the paper application(s) and sent to the National Supplier Clearinghouse (NSC).

Should you have any questions regarding this letter, please contact me at 1-866-734-9444 Extension 50335.

Sincerely,

Catherine Hughes
Provider Enrollment Program Analyst
Medicare Provider Enrollment
Wisconsin Physicians Service

Medicare.gov | Nursing Home Compare

The Official U.S. Government Site for Medicare

Ownership Information

COUNTRYWOOD NURSING CENTER, LLC
1645 RIDGE ROAD
HOPKINS, SC 29061
(803) 776-3873

Ownership: For profit - Corporation
Legal Business Name: COUNTRYWOOD NURSING CENTER, LLC

Owners and Managers of COUNTRYWOOD NURSING CENTER, LLC

5% OR MORE OWNERSHIP INTEREST
COUNTRYWOOD NURSING CENTER, LLC

MANAGING EMPLOYEE
JOSEPH HUNT

DIRECTOR/OFFICER
MARY FLORY

MANAGING EMPLOYEE
WENDELL PHILLIPS

5% OR MORE OWNERSHIP INTEREST
ROBERT HAGAN

DIRECTOR/OFFICER
ROBERT HAGAN

OPERATIONAL/MANAGERIAL CONTROL
STERLING HEALTHCARE, INC.

Medicare.gov | Nursing Home Compare

The Official U.S. Government Site for Medicare

Ownership Information

COUNTRYWOOD NURSING CENTER, LLC
1645 RIDGE ROAD
HOPKINS, SC 29061
(803) 776-3873

Ownership: For profit - Corporation
Legal Business Name: COUNTRYWOOD NURSING CENTER, LLC

Owners and Managers of COUNTRYWOOD NURSING CENTER, LLC

5% OR GREATER DIRECT OWNERSHIP INTEREST
COUNTRYWOOD NURSING CENTER, LLC (NO PERCENTAGE PROVIDED), since 10/11/2011
HAGAN, ROBERT (NO PERCENTAGE PROVIDED), since 11/19/2007

OPERATIONAL/MANAGERIAL CONTROL
STERLING HEALTHCARE, INC., since 11/19/2007

DIRECTOR
FLORY, MARY, since 10/11/2011
HAGAN, ROBERT, since 11/19/1997

OFFICER
FLORY, MARY, since 10/11/2011
HAGAN, ROBERT, since 11/19/2007

MANAGING EMPLOYEE
HUNT, JOSEPH, since 10/11/2011
PHILLIPS, WENDELL, since 11/19/2007

BPC-178B-C

CONFIDENTIAL

PO Box 995
1550 Gadsden Street
Columbia, SC 29202
www.dew.sc.gov

August 17, 2012

COUNTRYWOOD NURSING CENTER LLC
16 NORCROSS ST STE 100
ROSWELL, GA 30075

Claimant Name: [redacted]
SSN : [redacted]

311106

As part of a continuing effort to ensure the integrity of the Unemployment Insurance Program in the State of South Carolina, an audit of the claim for [redacted] Social Security Number [redacted] is being conducted. It has been discovered that this individual may have filed for Unemployment Insurance Benefits during the week(s) listed on the reverse side of this form. Any future week ending dates listed solely serve the purpose of affording the employer an opportunity to respond within the allowable ten (10) day period and the corresponding benefit payment cycle. This does not always mean that the claimant will file for these weeks. Completion of the reverse side of this form will assist the Department of Employment and Workforce in determining if this individual has been properly compensated as well as if potential credits may be due to the charged employer.

IMPORTANT:

The 7-Day Week Ending Period begins at 12:01 AM Sunday and ends at midnight on Saturday. If your pay period differs, use your daily earnings records to calculate GROSS EARNINGS for that 7-day period. Employers are required to keep daily earnings records by the Fair Labor Standards Act (FLSA). For more information of recordkeeping requirements, please download U.S. Department of Labor Fact Sheet #21:

http://www.dol.gov/whd/regs/compliance/whdfs21.pdf

Furthermore, report GROSS EARNINGS for the week(s) listed on the reverse side of this form and wages are considered to be "earned" during the week the work is PERFORMED, regardless of when the claimant is paid for the work.

EMPLOYER INSTRUCTIONS:

PLEASE CAREFULLY READ THE FOLLOWING INSTRUCTIONS BEFORE ATTEMPTING TO COMPLETE THIS FORM.

Please follow these steps to complete the reverse page of this audit form:

Item 1 Enter the first date of employment (not necessarily the Hire Date).
Item 2 Enter the last date actually worked (if applicable).
Item 3 Enter the Official Date of Separation (if applicable).
Item 4 Enter the ending rate of pay and check the box associated with the pay rate.
Item 5 Check the corresponding box for your current Method of Pay.
Item 6 Enter in the Day of Week Pay Period Ends, Day of the Week check is dated, and Day of the Week check is paid.
Item 7 Check the boxes that define the employee's normal work week.
Item 8 Check the box that defines the employee's current work status.
Item 9 Enter the amount of Gross Wages earned for the work performed for the specified week ending date listed.
Item 10 Enter the amount of any Other Pay earned by the individual for the specified week ending date listed.
Item 11 Enter in the "Type of Other Pay" column the appropriate number from the choices below:

1-Vacation Pay	2-Holiday Pay	3-Bonus Pay	4-Severance Pay
5-Pension	6-Sick Pay/Disability	7-Workers Compensation	8-Other

Item 12 Sign and date the bottom of the audit form. All entries must be validated by your name, signature, title, current date, and your telephone number. Please provide your email address, if applicable.

If no wages were earned, enter "None" in the Gross Earnings space. Please sign and date back of this form and return within ten (10) days of the mailing date of this form. Benefit Audits are our most effective method of detecting Unemployment Insurance Fraud. If the individual shown on the form never worked for you or if the social security number listed does not correspond to the one you have for the individual, please so note and return the form to us. Your efforts will help us maintain the integrity of the South Carolina Unemployment Insurance Program.

Submit completed form WITHIN TEN (10) DAYS to: S.C.D.E.W. Benefit Payment Control
Attn: BPC Audit P.O. Box 995 Columbia, SC 29202

To expedite processing of the wage information you may return the completed form by e-mail to: BPCAUDIT@DEW.SC.GOV or you may return the completed form by Fax to: 803-737-0299 or 803-737-4084. If you need assistance completing this form, please contact : Benefit Payment Control: 803-737-2490.

ONLINE ENTRY (have FEIN and SCDEW #): Login to WWW.SCBOS.SC.GOV, at MySCBOS tab drop and choose MySCBOS Workspace, then choose SCDEW - BPC-178B Employer Earnings Wage Audit Notice.

Countrywood 003305

CONFIDENTIAL

State of South Carolina
DEPARTMENT OF HEALTH AND HUMAN SERVICES
Post Office Box 101110
Columbia, South Carolina 29211-9804
FAX 803 252 0870

06/27/2011

COUNTRYWOOD NURSING CENTER LLC

16 NORCROSS ST STE 100
ROSWELL GA 30075

[redacted]
SSN: [redacted]
MEDICAID#: [redacted]
SOURCE: A

The above-named person has been identified to us by Social Security number as having been employed by your company within the past 18 months. In accordance with both federal and state regulations as cited on the reverse side of this form, we are attempting to determine if this individual or his/her dependents may have been covered by your group health insurance within the past 24 months. Please answer the following:

Is (was) this individual covered by group health insurance?

Yes ____ No ✓ Effective date: ____/____/____

If no, you do not need to complete and return this form.

Is (was) dependent coverage carried? Yes ____ No ✓

If coverage is lapsed, lapsed date: ____/____/____

Insurance Company Name and Address

_____

_____

_____

_____

Policy Holder: _____

Policy Number: _____

Group Number: _____

Please check all items below which are covered by the employee's or dependents' health insurance. If this should be completed by your insurance company, please forward.

Inpatient Hospital	____	Physical Therapy	____	Ambulance	____
Outpatient Hospital	____	Eye Examinations	____	Durable Equipment	____
Surgery	____	Eyeglasses	____	Skilled Nursing Home	____
Anesthesia	____	Inpatient Psychiatric	____	Intermediate Care Nursing Home	____
Doctor Office Visits	____	Psychiatric Visits	____	Oral Surgery	____
Diagnostic Tests	____	Home Health Care	____	Dental Care	____
Prescription Drugs	____	Dialysis	____		

Deductible Amount $ _____ Percentage benefits paid at: _____ %

Completed by Tessa Davis Phone number 803-776-3873 Date 7-6-11

If you have any questions, please call (803) 252-7070.

Thank you for your cooperation in our efforts to save South Carolina state taxpayer dollars.

Medicaid Insurance Verification Services

NET-101
Rev. 3/11

SOUTH CAROLINA DEPARTMENT OF EMPLOYMENT AND WORKFORCE
REQUEST FOR INFORMATION
UNEMPLOYMENT INSURANCE BENEFITS

CLAIMANT'S NAME: [redacted] SS#: [redacted]

NAME WORKED UNDER:

DATE MAILED: 2011-10-04

EMPLOYER'S ACCOUNT #: 473858

EMPLOYER'S NAME & ADDRESS: COUNTRYWOOD NURSING CENTER LLC
18 NORCROSS ST STE 100
ROSWELL, GA 30075

RETURN WITHIN SCDEW 10 DAYS OF THE ABOVE DATE TO: 201 Duffie Drive LEXINGTON, SC 29072

FAX NUMBER: 803-358-5838

This person has filed a claim for Unemployment Insurance Benefits and named you as a previous employer. Please explain the reason this person no longer works for you so that a determination can be made on eligibility for benefits. If you reply by letter, fax, or email, you must include all information requested, as well as the claimant's name and social security number. For instructions about responding by email, please go to to our agency website at www.dew.sc.gov. YOU WILL RECEIVE A DETERMINATION ON THIS CLAIM ONLY IF IT IS FOUND THAT YOU ARE THE BONA FIDE AND/OR LIABLE EMPLOYER.

[X] CLAIMANT'S Reason for Separation: DISCHARGED/FIRED/TERMINATED

I misconmunicated with a resident which the company found to be chidding, not teaching in nature.

[X] A telephone interview has already been scheduled for the claimant on 10/20/2011 at 11:00 AM. Please respond by mail, fax, email, telephone, or personal visit to the local ESC office above.

SEPARATION INFORMATION

[ ] LACK OF WORK (No additional written explanation is necessary.)

[X] DISCHARGED: (Give specific reason.)

See ATTACHED - INVESTIGATION

State company policy that claimant violated, if applicable, and describe the final incident leading to the separation:

Resident Verbal Abuse

List any warnings, note if verbal or written and give dates:

If discharged for absenteeism, list dates of absences:

[ ] VOLUNTARILY QUIT (Give specific reason.):

[ ] OTHER (Explain in detail.):

Dates of Employment: FROM: 9-1-2010 TO: 9-19-2011

During all terms of employment, have you paid this claimant as much as: $ [redacted] [X] YES [ ] NO

If NO, how much have you paid this claimant in all terms of employment? $ _____

Are you paying, or WILL YOU PAY, this claimant a pension or retirement pay? [ ] YES [X] NO

If YES, what amount? $ _____ PER _____

Did claimant contribute to pension plan? [ ] YES [X] NO If YES, what percent? _____ %

EMPLOYER NAME: TEGRA DAVIS ACCOUNT NUMBER: 473858

EMPLOYER SIGNATURE:** Tegra Davis TITLE: Human Resource

TELEPHONE NUMBER: 803-796-3873 DATE: 10/18/11

**FORM MUST BE SIGNED IN ORDER FOR INFORMATION TO BE CONSIDERED

EXHIBIT 16

CONFIDENTIAL

STERLING HEALTHCARE

EMPLOYMENT APPLICATION

DATE 10/12/07

PLEASE

READ CAREFULLY ANSWER ALL QUESTIONS; PRINT CLEARLY IN INK

PERSONAL

LAST NAME Love FIRST Hanley MIDDLE K

HOME ADDRESS [redacted] CITY [redacted]

HOME PHONE [redacted] ARE YOU 18 YEARS OF AGE OR OLDER? YES ✓ NO ○ IF HIRED CAN YOU AFTER EMPLOYMENT SUBMIT A WORK PERMIT YES ○ NO ○

IN CASE OF AN EMERGENCY NOTIFY [redacted]

IF HIRED, SUBMIT VERIFICATION OF YOUR LEGAL RIGHT TO WORK IN THE UNITED STATES? YES ✓ NO ○

ALIEN REGISTRATION RECEIPT NUMBER TYPE OF VISA IF HIRED YOU WILL BE REQUIRED TO SHOW PROOF OF CITIZENSHIP OR ALIEN REGISTRATION RECEIPT.

HAVE YOU EVER BEEN CONVICTED OF A FELONY, OR, WITHIN THE LAST (5) YEARS A MISDEMEANOR, WHICH WAS PLEAD OR DETERMINED? CONVICTION WILL NOT NECESSARILY DISQUALIFY YOU FOR THE JOB APPLIED FOR. [redacted]

OFFENSE(S) DATE PLACE DISPOSITION

HAVE YOU EVER SERVED IN THE UNITED STATES ARMED FORCES? YES ○ NO ✓

HAVE YOU BEEN PREVIOUSLY EMPLOYED BY STERLING HEALTHCARE YES ○ NO ✓ IF YES, STATE NAME/ADDRESS OF FACILITY

DATE: FROM TO LOCATION:

HOW DID YOU LEARN OF THIS JOB OPENING?

JOB INTEREST

POSITIONS DESIRED: FIRST CHOICE Maintaince SECOND CHOICE DATE AVAILABLE ASAP SALARY DESIRED

WORK HOURS / SHIFT PREFERRED: FULL TIME YES ○ NO ○ PART TIME YES ✓ NO ○ DAY SHIFT YES ✓ NO ○ EVENINGS YES ✓ NO ○ WEEKENDS YES ✓ NO ○

EDUCATIONAL RECORD

CIRCLE HIGHEST GRADE COMPLETED GRADE SCHOOL & HIGH SCHOOL 1 2 3 4 5 6 7 8 9 10 11 (12) COLLEGE OR GRAD SCHOOL

PROFESSIONAL LICENSES / RESTRICTIONS

TYPE	STATE ISSUED	DATE ISSUED	EXPIRES ON	NUMBER

TECHNICAL SKILLS

LIST WORK SKILLS FOR WHICH YOU HAVE BEEN TRAINED:

WORK EXPERIENCE

LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCE) MAY WE CONTACT YOUR PRESENT EMPLOYER? YES ✓ NO ○ WHAT OTHER NAME(S) HAVE YOU WORKED UNDER?

EMPLOYER Health Care Serivce EMPLOYED FROM MO. 10 YR. 05 TO MO. 10 YR. 07

ADDRESS Ridge Rd STREET CITY Hopkins STATE PHONE NUMBER

POSITION TITLE cook aid SALARY $ [redacted]

SUPERVISOR'S NAME & TITLE Lucille PERSON TO VERIFY EMPLOYMENT Lucille REASON FOR LEAVING

BRIEFLY DESCRIBE OTHER DUTIES help the cook

REASON FOR LEAVING Still there

CONFIDENTIAL

Country Wood Nursing Center

Sterling Healthcare

Employment Application

PLEASE READ CAREFULLY; ANSWER ALL QUESTIONS; PRINT CLEARLY IN INK

DATE: 11/19/08 APPLICATES DOB: [redacted]

LAST NAME: [redacted] FIRST: MIDDLE: SSN# [redacted]

HOME ADDRESS: [redacted] STREET APT CITY STATE ZIP

HOME PHONE: CELL PHONE: [redacted] WORK PHONE: [redacted]

ARE YOU UNDER 18 YEARS OLD? YES ☐ NO ☐ IF UNDER 18, CAN YOU AFTER EMPLOYMENT SUBMIT A WORK PERMIT YES ☐ NO ☐

IN CASE OF AN EMERGENCY, NOTIFY: (NAME, ADDRESS, TELEPHONE) [redacted]

CAN YOU AFTER EMPLOYMENT, SUBMIT VERIFICATION OF YOUR LEGAL RIGHT TO WORK IN THE UNITED STATES YES ☑ NO ☐

ALEIN REGISTERATION RECEIPT # TYPE OF VISA IF HIRED YOU WILL BE REQUIRED TO SHOW PROOF OF CITIZENSHIP OR ALIEN REGISTRATION RECEIPT

HAVE YOU EVER BEEN CONVICTED OF A FELONY, OR, WITHIN THE LAST (5) YEARS A MISDEMEANOR, WHICH RESULTED IN IMPRISONMENT? [redacted]
(A CONVICTION WILL NOT NECESSARILY DISQUALIFY YOU FROM THE JOB)
DATE: PLACE: DISPOSITION:

HAVE YOU EVER SERVED IN THE UNITED STATES ARMED FORCES? YES ☐ NO ☑

HAVE YOU BEEN PREVIOUSLY EMPLOYED BY STERLING HEALTHCARE? YES ☐ NO ☑ IF YES, GIVE NAME, ADDRESS OF FACILITY
DATES: FROM TO: LOCATION:

HOW DID YOU LEARN ABOUT THIS JOB? current emplyee - Betty Atkinson

JOB INTREST

POSITIONS: FIRST CHOICE Medical Records SECOND CHOICE DATE AVAILABLE immediately SALARY DESIRED [redacted]
WORK HOURS PERFERRED: FULL TIME/ YES ☑ NO ☐ PART TIME/ YES ☐ NO ☑ DAY SHIFT/ YES ☐ NO ☐
EVENING SHIFT/ YES ☐ NO ☐ NIGHT SHIFT/ YES ☐ NO ☐ WEEK-ENDS/ YES ☐ NO ☐

EDUCATION RECORD

CIRCLE HIGHEST GRADE COMPLETED GRADE SCHOOL & HIGH SCHOOL 1 2 3 4 5 6 7 8 9 10 11 12 COLLEGE OR GRAD SCHOOL

PROFESSIONAL LICENSES/RESTRICTIONS

TYPE: STATED ISSUED: DATE ISSUED: EXPERATION DATE
NUMBER

TECHINCAL SKILLS

LIST WORK SKILLS FOR WHICH YOU HAVE BEEN TRAINED: computer skills, experienced with office equipment, filing skills, customer service skills, call center experience, interviewing possible employees

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

WHAT OTHER NAMES HAVE YOU WORKER UNDER? Melissa Valencia
MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ☑ NO ☐
NAME OF EMPLOYER: Pendum
EMPLOYMENT DATES: FROM MONTH/YR 7/07 TO: MONTH/YR current
ADDRESS: STREET CITY PHONE NUMBER [redacted]
POSITION TITLE: ATM Tech
STARTING SALARY: [redacted] FINAL SALARY: [redacted]
SUPERVISOR'S NAME & TITLE: Timm Harwood / Branch Manager
PERSON (S) WE MAY CONTACT FOR REFERENCES: Timm Harwood, Mike Wheeley
BRIEFLY DESCRIBE YOUR DUTIES: service cash on ATM's around the state
REASON FOR LEAVING: job has become unsafe

Countrywood 002209

CONFIDENTIAL

Country Wood Nursing Center

Sterling Healthcare

Employment Application

PLEASE READ CAREFULLY; ANSWER ALL QUESTIONS; PRINT CLEARLY IN INK

DATE: 7-30-09 APPLICATES DOB: [redacted]

LAST NAME: STROMAN FIRST: LULA MIDDLE: M. SSN# [redacted]

HOME ADDRESS: STREET: [redacted] APT. HC 62 CITY [redacted] STATE [redacted] ZIP [redacted]

HOME PHONE: [redacted] CELL PHONE? WORK PHONE: [redacted]

ARE YOU UNDER 18 YEARS OLD? YES ☐ NO ☒ IF UNDER 18, CAN YOU AFTER EMPLOYMENT SUBMIT WORK PERMIT YES ☐ NO ☐

IN CASE OF AN EMERGENCY, NOTIFY: (NAME, ADDRESS, TELEPHONE) [redacted]

CAN YOU AFTER EMPLOYMENT, SUBMIT VERIFICATION OF YOUR LEGAL RIGHT TO WORK IN THE U.S.? YES ☒ NO ☐

ALIEN REGISTERATION RECEIPT # TYPE OF VISA IF HIRED YOU WILL BE REQUIRED TO SHOW PROOF OF CITIZENSHIP OR ALIEN REGISTRATION RECEIPT

HAVE YOU EVER BEEN CONVICTED OF A FELONY, OR, WITHIN THE LAST (5) YEARS A MISDEMEANOR, WHICH RESULTED IN IMPRISONMENT? (A CONVICTION WILL NOT NECESSARLY DISQUALIFY YOU FROM THE JOB) [redacted]

DATE: PLACE: DISPOSTITION:

HAVE YOU EVER SERVED IN THE UNITED STATES ARMED FORCES? YES ☐ NO ☒

HAVE YOU BEEN PREVIOUSLY EMPLOYED BY STERLING HEALTHCARE? YES ☐ NO ☒ IF YES, GIVE NAME, ADDRESS OF FACILITY

DATES: FROM TO: LOCATION:

HOW DID YOU LEARN ABOUT THIS JOB? DRIVING BY AREA WHEN VISITING RELATIVES

JOB INTREST

POSITIONS: FIRST CHOICE SECOND CHOICE DATE AVAILABLE SALARY DESIRED $8.00 - 9.00 /hr

WORK HOURS PERFERRED: FULL TIME/ YES ☐ NO ☐ PART TIME/ YES ☒ NO ☐ DAY SHIFT/ YES ☐ NO ☐

EVENING SHIFT/ YES ☐ NO ☐ NIGHT SHIFT/ YES ☐ NO ☐ WEEK-ENDS/ YES ☒ NO ☐

EDUCATION RECORD

CIRCLE HIGHEST GRADE COMPLETED GRADE SCHOOL & HIGH SCHOOL 1 2 3 4 5 6 7 8 9 10 11 (12) COLLEGE OR GRAD SCHOOL Midlands Tech. College

PROFESSIONAL LICENSES/RESTRICTIONS

TYPE: STATED ISSUED: DATE ISSUED: EXPERATION DATE

NUMBER

TECHINCAL SKILLS

LIST WORK SKILLS FOR WHICH YOU HAVE BEEN TRAINED: CNA - Certification #107280E 10-01-2008 - 9/30/2010

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

WHAT OTHER NAMES HAVE YOU WORKER UNDER?

MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ☒ NO ☐

NAME OF EMPLOYER: Returned

EMPLOYMENT DATES: FROM MONTH/YR JAN. 10-05 TO: MONTH/YR PRESENT 7-30-09

ADDRESS 2200 HARDEN STREET STREET CITY Columbia, S.C. PHONE NUMBER [redacted]

POSITION TITLE:

STARTING SALARY: $ [redacted] FINAL SALARY: $ [redacted] HR 24 7.30 IN

SUPERVISOR'S NAME & TITLE: Ms. C. Turner R.N.

PERSON (S) WE MAY CONTACT FOR REFERENCES: De Joyce Loyd Home [redacted]

BRIEFLY DESCRIBE YOUR DUTIES: Giving Appropriate Care To Disadvantaged Mentally ill Persons

REASON FOR LEAVING: DO NOT WANT TO LEAVE APPLING FOR PART TIME WORK

Countrywood004423

CONFIDENTIAL

WORK EXPERIENCE

LIST MOST RECENT EMPLOYER FIRST: INCLUDING VOLUNTEER EXPERIENCES

MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ✓ NO

NAME OF EMPLOYER:

EMPLOYMENT DATES: FROM MONTH/YR 10-98 TO: MONTH/YR 5-2003

ADDRESS STREET CITY PHONE NUMBER

200 Harden Street Columbia, S.C. 29203 [redacted]

POSITION TITLE: CNA-A

STARTING SALARY: [redacted] FINAL SALARY: [redacted]

SUPERVISOR'S NAME & TITLE: Ms. Etheridge L. Johnson

PERSON (S) WE MAY CONTACT FOR REFERENCES: Stephanie Harmon - work [redacted] (home)

BRIEFLY DESCRIBE YOUR DUTIES: Changed Beds And Attend School

REASON FOR LEAVING: Caring For disadvantaged and ill individuals

WORK EXPERIENCE

LIST MOST RECENT EMPLOYER FIRST: INCLUDING VOLUNTEER EXPERIENCES

MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ✓ NO

NAME OF EMPLOYER: Carolina Health Care Inc

EMPLOYMENT DATES: FROM MONTH/YR 7-96 TO: MONTH/YR 9-2004 Full & Part-Time

ADDRESS STREET CITY PHONE NUMBER

2408 Two Notch Rd. Columbia, S.C. 29204 [redacted]

POSITION TITLE:

STARTING SALARY: [redacted] FINAL SALARY: [redacted]

SUPERVISOR'S NAME & TITLE: CARMAN CARTER

PERSON (S) WE MAY CONTACT FOR REFERENCES: DALE STOCKER [redacted]

BRIEFLY DESCRIBE YOUR DUTIES: Giving Limited Care To person who were home bound.

REASON FOR LEAVING: Went back to work Full-time For S.C. Dept. Mental Health

PLEASE READ THE FOLLOWING CAREFULLY BEFORE SIGNING THE APPLICATION

I authorize investigation of all statements contained in this application blank if I am considered for employment. I also authorize previous employers named, or any other person or persons to whom Country Wood Nursing Center, Sterling Healthcare, Inc. refers to: give any and all information regarding my employment or scholastic standing together with any pertinent information.

I understand that misrepresentation or omission of the facts requested, the receipt of unsatisfactory references, or failure to pass prescribed physical examination will be sufficient cause for dismissal from the company's service if I have been employed. I further understand that if I am employed, my employment will be on an orientation basis for a specified period of time. In addition to any other reason or reasons, the orientation period, I may be discharged for my inability to adapt myself to the requirements and duties of my employment. Some type of employment offered by Country Wood Nursing Center, Sterling Healthcare, Inc. may require a Criminal Record Check as a condition of employment.

Signature: Julie Mae Thomas Date: 7-30-09

To Be Completed After Being Hired

Do you prefer to be called by other then your given name? [ ] Yes [ ] No Nickname? _____

Age _____ Date of Birth _____ Marital Status: [ ] Single [ ] Married [ ] Divorced [ ] Separated

Number of children _____ Ages _____

Have you ever had a back injury [ ] Yes [ ] No If yes, explain: _____

National Origin _____ Race _____ Sex [ ] Female [ ] Male

Related to any one in our employment? State Name and Facility Location _____

[redacted]

CONFIDENTIAL

Country Wood Nursing Center

Sterling Healthcare

Employment Application

CNA SINCE 5/09
APP @ 1pm
01-22-2010

AVAILABLE ALL SHIFT (NIGHTS)

PLEASE READ CAREFULLY; ANSWER ALL QUESTIONS; PRINT CLEARLY IN INK

DATE: 1-12-2010 APPLICATES DOB: [redacted]

LAST NAME: Williams FIRST: Michael MIDDLE: Kendall SSN#: [redacted]

HOME ADDRESS: STREET APT CITY STATE ZIP [redacted]

HOME PHONE: [redacted] CELL PHONE: WORK PHONE @ 9 AM -1-22-2010

ARE YOU UNDER 18 YEARS OLD? YES ☐ NO ☒ IF UNDER 18, CAN YOU AFTER EMPLOYMENT SUBMIT A WORK PERMIT YES ☐ NO ☐

IN CASE OF AN EMERGENCY, NOTIFY: (NAME, ADDRESS, TELEPHONE) [redacted]

CAN YOU AFTER EMPLOYMENT, SUBMIT VERIFICATION OF YOUR LEGAL RIGHT TO WORK IN THE UNITED STATES YES ☒ NO ☐

ALEIN REGISTERATION RECEIPT # TYPE OF VISA IF HIRED YOU WILL BE REQUIRED TO SHOW PROOF OF CITIZENSHIP OR ALIEN REGISTRATION RECEIPT

HAVE YOU EVER BEEN CONVICTED OF A FELONY, OR, WITHIN THE LAST (5) YEARS A MISDEMEANOR, WHICH RESULTED IN IMPRISONMENT? [redacted]
(A CONVICTION WILL NOT NECESSARILY DISQUALIFY YOU FROM THE JOB)
DATE: PLACE: DISPOSITION:

HAVE YOU EVER SERVED IN THE UNITED STATES ARMED FORCES? YES ☐ NO ☒

HAVE YOU BEEN PREVIOUSLY EMPLOYED BY STERLING HEALTHCARE? YES ☐ NO ☒ IF YES, GIVE NAME, ADDRESS OF FACILITY
DATES: FROM TO: LOCATION:

HOW DID YOU LEARN ABOUT THIS JOB? Referral

JOB INTREST: CNA

POSITIONS: FIRST CHOICE CNA SECOND CHOICE DATE AVAILABLE 1-12 SALARY DESIRED $ 8.50
WORK HOURS PERFERRED: FULL TIME/ YES ☒ NO ☐ PART TIME/ YES ☒ NO ☐ DAY SHIFT/ YES ☒ NO ☐
EVENING SHIFT/ YES ☒ NO ☐ NIGHT SHIFT/ YES ☒ NO ☐ WEEK-ENDS/ YES ☒ NO ☐

EDUCATION RECORD

CIRCLE HIGHEST GRADE COMPLETED GRADE SCHOOL & HIGH SCHOOL 1 2 3 4 5 6 7 8 9 10 11 12 COLLEGE OR GRAD SCHOOL Morgan State Univ.

PROFESSIONAL LICENSES/RESTRICTIONS

TYPE: STATED ISSUED: DATE ISSUED: EXPERATION DATE
NUMBER

TECHINCAL SKILLS

LIST WORK SKILLS FOR WHICH YOU HAVE BEEN TRAINED: Certified Nurse Aid

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

WHAT OTHER NAMES HAVE YOU WORKER UNDER?
MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ☐ NO ☐
NAME OF EMPLOYER: Blue Cross
EMPLOYMENT DATES: FROM MONTH/YR 9-07 TO: MONTH/YR 11-08

ADDRESS STREET CITY PHONE NUMBER [redacted]
Keswick Rd Columbia
POSITION TITLE:
STARTING SALARY: [redacted] FINAL SALARY: [redacted]
SUPERVISOR'S NAME & TITLE: Dan Georgia
PERSON (S) WE MAY CONTACT FOR REFERENCES: Dan Georgia
BRIEFLY DESCRIBE YOUR DUTIES: Take Customer Service calls
REASON FOR LEAVING: laid off

1/13/10

CONFIDENTIAL

Country Wood Nursing Center

Sterling Healthcare

Employment Application

PLEASE READ CAREFULLY; ANSWER ALL QUESTIONS; PRINT CLEARLY IN INK

APPLICATES DOB: [redacted]

TE: 6.8.2011

SSN# [redacted]

ST NAME: Wilson FIRST: Carolina MIDDLE: Denise

OME ADDRESS: [redacted] STREET APT CITY STATE ZIP

OM [redacted]

RE YOU UNDER 18 YEARS OLD? YES ☐ NO ☑ IF UNDER 18, CAN YOU AFTER EMPLOYMENT SUBMIT

WORK PERMIT YES ☐ NO ☐

N CASE OF AN EMERGENCY, NOTIFY: (NAME, ADDRESS, TELEPHONE) [redacted]

CAN YOU AFTER EMPLOYMENT, SUBMIT VERIFICATION OF YOUR LEGAL RIGHT TO WORK IN THE UNITED STATES YES ☑ NO ☐

ALEIN REGISTERATION RECEIPT # TYPE OF VISA IF HIRED YOU WILL BE REQUIRED TO SHOW PROOF OF CITIZENSHIP OR ALIEN REGISTRATION RECEIPT

HAVE YOU EVER BEEN CONVICTED OF A FELONY, OR, WITHIN THE LAST (5) YEARS A MISDEMEANOR, WHICH RESULTED IN IMPRISONMENT? [redacted]
(A CONVICTION WILL NOT NECESSARILY DISQUALIFY YOU FROM THE JOB)
DATE: PLACE: DISPOSTITION:

HAVE YOU EVER SERVED IN THE UNITED STATES ARMED FORCES? YES ☐ NO ☑

HAVE YOU BEEN PREVIOUSLY EMPLOYED BY STERLING HEALTHCARE? YES ☐ NO ☑ IF YES, GIVE NAME, ADDRESS OF FACILITY
DATES: FROM TO: LOCATION:

HOW DID YOU LEARN ABOUT THIS JOB? MARY ANN (CNA)

JOB INTREST

POSITIONS: FIRST CHOICE CNA SECOND CHOICE DATE AVAILABLE SALARY DESIRED

WORK HOURS PERFERRED: FULL TIME/ YES ☐ NO ☐ PART TIME/ YES ☑ NO ☐ DAY SHIFT/ YES ☑ NO ☐

EVENING SHIFT/ YES ☑ NO ☐ NIGHT SHIFT/ YES ☐ NO ☐ WEEK-ENDS/ YES ☑ NO ☐

EDUCATION RECORD

CIRCLE HIGHEST GRADE COMPLETED GRADE SCHOOL & HIGH SCHOOL 1 2 3 4 5 6 7 8 9 10 11 (12) COLLEGE OR GRAD SCHOOL Manstield Business

PROFESSIONAL LICENSES/RESTRICTIONS

TYPE: NUMBER 116512E STATED ISSUED: South Carolina DATE ISSUED: 08.07.2009 EXPERATION DATE 08-31-2011

TECHINCAL SKILLS

LIST WORK SKILLS FOR WHICH YOU HAVE BEEN TRAINED: many skill in the nursing field. ROM, Bloodpressure, Temp, Pulse And Alot more.

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

WHAT OTHER NAMES HAVE YOU WORKER UNDER?

MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ☑ NO ☐

NAME OF EMPLOYER: IVY Jackson

EMPLOYMENT DATES: FROM MONTH/YR 8.2009 TO: MONTH/YR 6.2011

ADDRESS 209 DEVOE STREET Columbia CITY PHONE NUMBER [redacted]

POSITION TITLE: PCA

STARTING SALARY: [redacted] FINAL SALARY: [redacted]

SUPERVISOR'S NAME & TITLE: IVY Jackson

PERSON (S) WE MAY CONTACT FOR REFERENCES: Yes

BRIEFLY DESCRIBE YOUR DUTIES: dressing, bathing, light meals, light housekeep

REASON FOR LEAVING: Father passed away

Countrywood 002609

CONFIDENTIAL

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

MAY WE CONTACT YOUR PRESENT EMPLOYERS? (YES) NO

NAME OF EMPLOYER:

EMPLOYMENT DATES: FROM MONTH/YR 1.4.2008 TO: MONTH/YR 5.2008

ADDRESS STREET CITY Columbia PHONE NUMBER [redacted]

POSITION TITLE: DEA

STARTING SALARY: [redacted] FINAL SALARY: [redacted]

SUPERVISOR'S NAME & TITLE: MRS. Johnson, MR. Worthy

PERSON (S) WE MAY CONTACT FOR REFERENCES: yes

BRIEFLY DESCRIBE YOUR DUTIES: Feed soldeys, dishes, serving food

REASON FOR LEAVING: Grandmother died and had to take care of my father (Disable)

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

MAY WE CONTACT YOUR PRESENT EMPLOYERS? (YES) NO

NAME OF EMPLOYER:

EMPLOYMENT DATES: FROM MONTH/YR unsure TO: MONTH/YR 6-2006 - Nov. 2006

ADDRESS Elmwood STREET CITY Cola PHONE NUMBER [redacted]

POSITION TITLE: PCA

STARTING SALARY: [redacted] FINAL SALARY: [redacted]

SUPERVISOR'S NAME & TITLE: Shawanela

PERSON (S) WE MAY CONTACT FOR REFERENCES: Shawanela

BRIEFLY DESCRIBE YOUR DUTIES: bathing, dressing, transfer, feeding

REASON FOR LEAVING: [redacted] Pregnant unable to fulfill duties, I was re in 2011 but they didn't have enough work. I quit on 6-10hr qu 2wks

PLEASE READ THE FOLLOWING CAREFULLY BEFORE SIGNING THE APPLICATION

-I authorize investigation of all statements contained in this application blank if I am considered for employment. I also authorize previous employers named, or any other person or persons to whom Country Wood Nursing Center, Sterling Healthcare, Inc. refers to; give any and all information regarding my employment or scholastic standing together with any pertinent information.

-I understand that misrepresentation or omission of the facts requested, the receipt of unsatisfactory references or failure to pass prescribed physical examination will be sufficient cause for dismissal from the company's service if I have been employed. I further understand that if I am employed, my employment will be on an orientation basis for a specified period of time. In addition to any other reason or reasons, the orientation period, I may be discharged for my inability to adapt myself to the requirements and duties of my employment.

-Some type of employment offered by Country Wood Nursing Center, Sterling Healthcare, Inc. may require a Criminal Record Check as a condition of employment.

Signature: [signature] Date: 6.8.2011

To Be Completed After Being Hired

Do you prefer to be called by other then your given name? [ ] Yes [ ] No Nickname? _____

Age _____ Date of Birth _____ Marital Status: [ ] Single [ ] Married [ ] Divorced [ ] Separated

Number of children _____ Ages _____

Have you ever had a back injury [ ] Yes [ ] No If yes, explain: _____

National Origin _____ Race _____ Sex [ ] Female [ ] Male

Related to any one in our employment? State Name and Facility Location _____

Countrywood 002610

CONFIDENTIAL

Country Wood Nursing Center

Sterling Healthcare

Employment Application

PLEASE READ CAREFULLY; ANSWER ALL QUESTIONS; PRINT CLEARLY IN INK

DATE: 9/25/13 APPLICATES DOB: [redacted]

LAST NAME: Adamson FIRST: Tammy MIDDLE: Ann SSN# [redacted]

[redacted] WORK PHONE:

ARE YOU UNDER 18 YEARS OLD? YES ☑ NO ☐ IF UNDER 18, CAN YOU AFTER EMPLOYMENT SUBMIT A WORK PERMIT YES ☐ NO ☐

IN CASE OF AN EMERGENCY, NOTI[redacted]

CAN YOU AFTER EMPLOYMENT, SUBMIT VERIFICATION OF YOUR LEGAL RIGHT TO WORK IN THE UNITED STATES YES ☑ NO ☐

ALEIN REGISTERATION RECEIPT # TYPE OF VISA IF HIRED YOU WILL BE REQUIRED TO SHOW PROOF OF CITIZENSHIP OR ALIEN REGISTRATION RECEIPT

HAVE YOU EVER BEEN CONVICTED OF A FELONY, OR, WITHIN THE LAST (5) YEARS A MISDEMEANOR, WHICH RESULTED IN IMPRISONMENT? [redacted]
(A CONVICTION WILL NOT NECESSARLY DISQUALIFY YOU FROM THE JOB)
DATE: PLACE: DISPOSTITION:

HAVE YOU EVER SERVED IN THE UNITED STATES ARMED FORCES? YES ☑ NO ☐

HAVE YOU BEEN PREVIOUSLY EMPLOYED BY STERLING HEALTHCARE? YES ☐ NO ☑ IF YES, GIVE NAME, ADDRESS OF FACILITY
DATES: FROM TO: LOCATION:

HOW DID YOU LEARN ABOUT THIS JOB?

JOB INTREST

POSITIONS: FIRST CHOICE SECOND CHOICE DATE AVAILABLE SALARY DESIRED
WORK HOURS PERFERRED: FULL TIME/ YES ☑ NO ☐ PART TIME/ YES ☐ NO ☐ DAY SHIFT/ YES ☐ NO ☐
EVENING SHIFT/ YES ☐ NO ☐ NIGHT SHIFT/ YES ☐ NO ☐ WEEK-ENDS/ YES ☐ NO ☐

EDUCATION RECORD

CIRCLE HIGHEST GRADE COMPLETED GRADE SCHOOL & HIGH SCHOOL 1 2 3 4 5 6 7 8 9 10 11 12 COLLEGE OR GRAD SCHOOL Benedict College BS

PROFESSIONAL LICENSES/RESTRICTIONS

TYPE: STATED ISSUED: DATE ISSUED: EXPERATION DATE
NUMBER

TECHINCAL SKILLS

LIST WORK SKILLS FOR WHICH YOU HAVE BEEN TRAINED:

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

WHAT OTHER NAMES HAVE YOU WORKER UNDER? _____
MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ☑ NO ☐
NAME OF EMPLOYER:
EMPLOYMENT DATES: FROM MONTH/YR TO: MONTH/YR
ADDRESS STREET CITY PHONE NUMBER

POSITION TITLE:
STARTING SALARY: FINAL SALARY:

SUPERVISOR'S NAME & TITLE:
PERSON (S) WE MAY CONTACT FOR REFERENCES:
BRIEFLY DESCRIBE YOUR DUTIES:
REASON FOR LEAVING:

CONFIDENTIAL

Country Wood Nursing Center

Sterling Healthcare

Employment Application

PLEASE READ CAREFULLY; ANSWER ALL QUESTIONS; PRINT CLEARLY IN INK

DATE: 1/8/14 APPLICATES DOB: [redacted]

LAST NAME: Jordan FIRST: Virginia MIDDLE: S. SSN# [redacted]

HOME ADDRESS: STREET [redacted] APT CITY STATE

HOME PHONE: [redacted] CELL PHONE: [redacted] WORK PHONE:

ARE YOU UNDER 18 YEARS OLD? YES ☐ NO ☑ IF UNDER 18, CAN YOU AFTER EMPLOYMENT SUBMIT A WORK PERMIT YES ☐ NO ☐

IN CASE OF [redacted]

CAN YOU AFTER EMPLOYMENT, SUBMIT VERIFICATION OF YOUR LEGAL RIGHT TO WORK [redacted] YES ☐ NO ☐

ALEIN REGISTERATION RECEIPT # TYPE OF VISA IF HIRED YOU WILL BE REQUIRED TO SHOW PROOF OF CITIZENSHIP OR ALIEN REGISTRATION RECEIPT

HAVE YOU EVER BEEN CONVICTED OF A FELONY, OR, WITHIN THE LAST (5) YEARS A MISDEMEANOR, WHICH RESULTED IN IMPRISONMENT? (A CONVICTION WILL NOT NECESSARILY DISQUALIFY YOU FROM THE JOB)
DATE: PLACE: DISPOSITION: [redacted]

HAVE YOU EVER SERVED IN THE UNITED STATES ARMED FORCES? YES ☐ NO ☑

HAVE YOU BEEN PREVIOUSLY EMPLOYED BY STERLING HEALTHCARE? YES ☑ NO ☐ IF YES, GIVE NAME, ADDRESS OF FACILITY
DATES: FROM TO: LOCATION: Countrywood

HOW DID YOU LEARN ABOUT THIS JOB?

JOB INTREST

POSITIONS: FIRST CHOICE ✓ SECOND CHOICE DATE AVAILABLE SALARY DESIRED
WORK HOURS PERFERRED: FULL TIME/ YES ☑ NO ☐ PART TIME/ YES ☐ NO ☐ DAY SHIFT/ YES ☐ NO ☐
EVENING SHIFT/ YES ☐ NO ☐ NIGHT SHIFT/ YES ☐ NO ☐ WEEK-ENDS/ YES ☐ NO ☐

EDUCATION RECORD

CIRCLE HIGHEST GRADE COMPLETED GRADE SCHOOL & HIGH SCHOOL 1 2 3 4 5 6 7 8 9 10 11 12 COLLEGE OR GRAD SCHOOL Nursing School

PROFESSIONAL LICENSES/RESTRICTIONS

TYPE: STATED ISSUED: DATE ISSUED: EXPERATION DATE
NUMBER

TECHINCAL SKILLS

LIST WORK SKILLS FOR WHICH YOU HAVE BEEN TRAINED: Nursing, Admission and Social Services

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

WHAT OTHER NAMES HAVE YOU WORKER UNDER? NA
MAY WE CONTACT YOUR PRESENT EMPLOYERS? YES ☑ NO ☐
NAME OF EMPLOYER: Palmetto Health Baptist
EMPLOYMENT DATES: FROM MONTH/YR TO: MONTH/YR

ADDRESS STREET CITY PHONE NUMBER [redacted]
New & Marion Cola, S.C.
POSITION TITLE:
STARTING SALARY: FINAL SALARY:
SUPERVISOR'S NAME & TITLE: Patricia Robinson, RN Manager Sub-Acute, Rehab.
PERSON (S) WE MAY CONTACT FOR REFERENCES:
BRIEFLY DESCRIBE YOUR DUTIES: Staff Nurse
REASON FOR LEAVING:

CONFIDENTIAL

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

Y WE CONTACT YOUR PRESENT EMPLOYERS? YES ✓ NO

ME OF EMPLOYER:

PLOYMENT DATES: FROM MONTH/YR TO: MONTH/YR see Resume

DRESS STREET CITY PHONE NUMBER

SITION TITLE:

RTING SALARY: FINAL SALARY:

ERVISOR'S NAME & TITLE:

RSON (S) WE MAY CONTACT FOR REFERENCES:

EFLY DESCRIBE YOUR DUTIES:

ASON FOR LEAVING:

WORK EXPERIENCE

(LIST MOST RECENT EMPLOYER FIRST, INCLUDING VOLUNTEER EXPERIENCES)

Y WE CONTACT YOUR PRESENT EMPLOYERS? YES [ ] NO [ ]

ME OF EMPLOYER:

PLOYMENT DATES: FROM MONTH/YR TO: MONTH/YR

DRESS STREET CITY PHONE NUMBER

SITION TITLE:

RTING SALARY: FINAL SALARY:

ERVISOR'S NAME & TITLE:

RSON (S) WE MAY CONTACT FOR REFERENCES:

EFLY DESCRIBE YOUR DUTIES:

ASON FOR LEAVING:

PLEASE READ THE FOLLOWING CAREFULLY BEFORE SIGNING THE APPLICATION

authorize investigation of all statements contained in this application blank if I am considered for ployment. I also authorize previous employers named, or any other person or persons to whom Country ood Nursing Center, Sterling Healthcare, Inc. refers to; give any and all information regarding my ployment or scholastic standing together with any pertinent information.

understand that misrepresentation or omission of the facts requested, the receipt of unsatisfactory references, failure to pass prescribed physical examination will be sufficient cause for dismissal from the company's vice if I have been employed. I further understand that if I am employed, my employment will be on an ientation basis for a specified period of time. In addition to any other reason or reasons, the orientation riod, I may be discharged for my inability to adapt myself to the requirements and duties of my employment. ome type of employment offered by Country Wood Nursing Center, Sterling Healthcare, Inc. may require a iminal Record Check as a condition of employment.

gnature: Virginia A. Jordan Date: 1/8/14

To Be Completed After Being Hired

you prefer to be called by other then your given name? [✓] Yes [ ] No Nickname? Jennie

e 61 Date of Birth [redacted] Marital Status: [ ] Single [✓] Married [ ] Divorced [ ] Separated

mber of children [redacted] Ages [redacted]

ve you ever had a back injury [ ] Yes [✓] No If yes, explain:

tional Origin Race W Sex [✓] Female [ ] Male

lated to any one in our employment? State Name and Facility Location NO

EXHIBIT 17

CONFIDENTIAL

BPC-178
Rev. 1/07

EMPLOYER:
Please be advised that this form is not a claim for benefits. This is an audit and the week(s) listed below are the week(s) this individual claimed unemployment benefits. This form does not mean that the benefits were charged to your account. The purpose of this form is to determine if this individual earned wages during the seven (7) consecutive days of the benefit weeks listed below.

PLEASE READ THE INSTRUCTIONS ON THE BACK OF THIS FORM CAREFULLY. BE CERTAIN THE WAGE INFORMATION YOU PROVIDE IS CORRECT AS IT MAY BE THE BASIS FOR LEGAL ACTION AGAINST THE CLAIMANT.

IF YOU NEED ASSISTANCE IN COMPLETING THIS FORM, PLEASE CONTACT BENEFIT PAYMENT CONTROL UNIT 803-737-2490 OR 803 737 2492

CROSSMATCH: NEWHIRE
COUNTRYWOOD NURSING
1645 RIDGE ROAD
HOPKINS SC 29061

EMPLOYER ACCOUNT | FID NUMBER | AUDIT RUN DATE: 05/30/2010

EMPLOYEE NAME: [redacted] SSN: [redacted] BYE: 08/29/10 CLM TYPE: T LOI: 430

1. FIRST DAY WORKED: 05/07/2010 LAST DAY WORKED: PRESENT

2. CHECK TYPE OF PAY PERIOD ☐ MONTHLY ☒ SEMI MONTHLY ☐ WEEKLY ☐ BI-WEEKLY

3. CLAIM WEEK ENDING DATE	4. GROSS WEEKLY WAGES	5. PAYROLL WEEK ENDING DATE	6. CHECK IF OTHER THAN REGULAR PAY V	S	H
05/22/10	[redacted]	5-15-10	✓	✓	✓
05/15/10					
05/08/10					

3. CLAIM WEEK ENDING DATE	4. GROSS WEEKLY WAGES	5. PAYROLL WEEK ENDING DATE	6. CHECK IF OTHER THAN REGULAR PAY V	S	H

7. THIS INFORMATION PROVIDED BY ME IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

SIGNATURE: Tonya Davis TITLE: Human Resources DATE: 6-3-2010

PHONE: 803-776-3873 FAX: 803-217-0365 E-MAIL: TDAVIS@STERLING-HEALTH.COM

TO EXPEDITE PROCESSING OF THE WAGE INFORMATION
YOU MAY RETURN THE COMPLETED FORM BY E-MAIL TO: BPCAUDIT@SCES.ORG
OR YOU MAY RETURN THE COMPLETED FORM BY FAX TO: 803-737-0299 OR 803-737-4084.

DATE MAILED: 06/01/2010 | SSN: [redacted] | EAN | EMPLOYER NAME: COUNTRYWOOD NURSING

Countrywood 006076

CONFIDENTIAL Kennan High School

Richland One
South Carolina's Capital Schools
Discover The Urban Advantage

Samuel A. Heyward Career and Technology Center

September 14, 2011

Dear Organization:

A student in my Health Science/Medical Terminology course at Heyward Career and Technology Center would like to volunteer with your agency to perform community service. In order for the student to receive credit, they must volunteer for at least 25 hours. If you agree to allow the student to work with your organization please fill out the bottom portion of this letter. If you have any questions or concerns, I can be reached at (803) 735-3343.

Thank you in advance for your cooperation and support.

Sincerely,

M. C. Adams-Brown, NBCT, MPH, MS
Health Science Teacher

Countrywood Nursing Center
Organization

Amber Hunt
Representative for the Organization

jhunt@sterling-health.com
Email address

803-776-3873
Telephone Number

803-217-6365
Fax Number

EXHIBIT 18

Sterling Healthcare, Inc.

Job Description

Job Title: LPN Patient Care Coordinator

Department: Nursing

Supervisor: Director of Nursing

Working Hours: Full time forty (40) hours per week. These hours may be week days and/or weekends on any shift.

Minimum Qualifications: Must be at least twenty (20) years of age; a graduate of an accredited School of Nursing; & be currently licensed in the state the facility is located; organizational, & leadership ability; prefer two (2) to three (3) years experience in Care Planing, MDS completion; genuine interest & concern for working with the elderly.

Job Summary: Responsible for the planing, organizing, & implementing of Minimum Data Set & Personalized Care Plan for each resident at admission, quarterly and any change of status, in accordance with federal, state & local regulations, to ensure timely completion of same.

Job Duties:

1. Responsible for completion & transmittal of all Minimum Data Sets on each resident in the facility, in accordance with federal, state & local regulations.
2. Assist in developing, & establishing the resident Care Plans, ensures that the staff are following same.
3. Required to check nursing documentation to ensure Care Plan is current & updated on a timely basis, in accordance with established policies & procedures of the facility.
4. Coordinates with the Director of Nursing, the planning & preparation of team conferences to maintain the MDS's & Care Plans in compliance with regulations
5. Assist with any on the job training of staff related to resident care plans. This may be through conferences or on site demonstrations.
6. Can & will assume the duties of Charge Nurse on an as needed basis.
7. Knows & understands the principles of the Prospective Payment System (PPS) as it applies to the completion and timely transmission of the MDS.
8. Has a good working knowledge of the Rug's III payment system as it applies to Medicare admissions.
9. Responsible for making rounds on all residents to evaluate, receive comments, review care to ensure the personalized Care Plan is up to date.
10. Communicates with the Director of Nursing and/or Administrator regarding current status of resident on as needed basis.
11. Assist with necessary documentation on all new admissions as needed.
12. Understands, supports & implements established policies of the facility.

Sterling Healthcare, Inc.

LPN PCC page 2

13. Responsible to ensure the physical assessment & documentation of all admissions & post hospital returns are completed according to facility policies and OBRA regulations.
14. Responsible for knowing & ensuring that all residents right's are maintained.
15. As deemed necessary may be requested to check the quality of the residents twenty four (24) hour nursing care.
16. All other duties as deemed necessary & assigned by Director of Nursing and/or the Administrator.

Responsible for:

1. Treating all residents, employees, visitors with respect & dignity.
2. Knowing & protecting all residents right's.
3. Knowing and enforcing the facility policies & procedures.
4. Completing the MDS transmittals in a timely fashion as per regulatory requirements.

Working Conditions: Works in well lighted, well ventilated area. The job as approximately twenty five percent (25%) walking, standing, bending, & stooping. Documentation is approximately seventy five percent (75%) of the job. May be required to lift or assist with lifting of residents. May be subject to the behavior of confused or disoriented resident. Subject to the risk of occupational exposure of potentially infectious material.

I have read & understand this job description & its requirements; I understand that this is not an exclusive listing of the job functions & that I am expected to complete all duties as assigned; I understand the job functions may be altered by management without notice; I understand that this job descriptions in no way constitutes an employment agreement & that I am an at-will employee. I have received my copy of same.

Betty O. Stevenson LPN — 12-31-07

LPN Signature — Date

Facility Representative Signature — Date

copies: Personnel File
Employee

Sterling Healthcare, Inc.

Job Description

Job Title: Non - Certified Nursing Assistant

Department: Nursing

Supervisor: Charge Nurse / Supervisor

Working Hours: Full time forty (40) hours per week. These hours will be week days until training session has been completed.

Minimum Qualifications: Must met all OBRA requirements for CNA training. Must wear a name badge with the words "In Training" identified on it.

Job Summary: Responsible for non professionals care given to the residents within the area of completed training.

Job Duties:

1. Must work "buddy system" with a CNA while on the unit at all times.
2. Must not perform any job function for which he/she has not received training.
3. May pass ice water.
4. May assist residents with the setting up of their meal tray for eating.
5. May make unoccupied beds as needed.
6. May assist residents with dressing & undressing.
7. May escort residents to & from meals and/or activities.
8. May assist residents with washing of face & hands.
9. May assist with the setting up process for brushing of teeth or dentures.
10. May assist with combing/brushing of hair for residents.
11. May ensure residents have clean clothing available by putting up of clothing received from the laundry.

Working Conditions: Works in well lighted, well ventilated area. The job is approximately fifty (50) percent (50%) walking, bending stooping & setting, Classroom work is approximately fifty (50) percent (50%) May be subject to the behavior of confused or disoriented resident. Should not be subject to the risk of occupational exposure of potentially infectious material while in training.

I have read & understand this job description & its requirements. I understand the job functions may be altered by management. I have received my copy of same.

Vanessa L. McNeil — 01-07-08

Non Certified Nursing Assistant — Date

Maureen Cotter, RNHA — 1/7/08

Facility Representative Signature — Date

copies: Personnel File / Employee

Sterling Healthcare, Inc.
Job Description

Job Title: Administrator

Department: Administration

Supervisor: Regional Manager

Working Hours: Full time forty (40) hours per week. Usually Monday through Friday, must work occasionally after normal hours as necessary to accomplish the responsibilities of the job; is expected to work some weekends, evening & nights in order to adequately supervise.

Qualifications: Must be currently licensed in state the facility is located. Two years of long term care experience preferred. Organizational and leadership ability, genuine interest & concern for working with the elderly.

Job Summary: Contributes to the physical, mental, emotional & spiritual well being of the residents by coordination, supervision & directing of all facility personnel: must maintain the dignity, respect & privacy, at all times for the resident & staff; works with all facility departments to provide overall care & comfort for each resident.

Job Duties:

1. Managing of the ongoing functions of the Nursing Center as required to fulfill all regulations of local, county, state and federal agencies.
2. Employs an adequate number of appropriately trained professional & auxiliary personnel including the appropriated delegations of duties to ensure the needs of the residents are met.
3. Ensures the public information describing the services of the Nursing Center is accurate.
4. Ensures each resident's right to fair & equitable treatment, self determination, individuality, privacy, property and civil rights
5. Ensures each resident & their families of their right to lodge a complaint without fear or reprisal & to expect a reasonable response to such complaints
6. Ensures each resident of their right to maintain a lifestyle which is respected by all & to maintain said lifestyle within reasonable parameters as defined by their physical & mental ability
7. Enforces the rule & regulations of the *Long Term Care Facilities Residents Bill of Right's*
8. Ensures the implementation of established resident care policies, personnel policies, preparations of budget, etc.
9. Serving as liaison to the Board of Directors, Medical Staff, Professional Staff, & other Supervisory Staff
10. Evaluates & as deemed appropriate implements those recommendations from the Nursing Center's QA Committees.

Sterling Healthcare, Inc.
Job Description

11. Ensures the Nursing Center admits only those residents for whom it can provide adequate care, and:
12. Maintains his/her professional status through periodic educational & professional activities as required by state law
13. All other duties as deemed necessary & assigned by the Regional Manager

Responsible for:

1. Treating all residents, employees, visitors with respect & dignity.
2. Knowing & protecting all residents right's.
3. Organizing & directing the operation of the facility; defining lines of authority & delegation of duties.
4. Serving as a member of the facilities Admission & Discharge Committee.
5. Maintains supplies & equipment necessary for the efficient operation of the Nursing Center.
6. Enforcement of the facility's policies & procedures related to personnel & safety matters.
7. Presenting a favorable image to the residents, visitors, and general public.

Working Conditions: Works in well lighted, well ventilated area. May stand, stoop, bend & walk approximately 75 to 80 percent (75-80%) of the workday. May be subject to the behavior of confused or disoriented resident. This job may be subject to the risk of occupational exposure of potentially infectious material. Is not considered an "at risk" position.

I have read & understand this job description & its requirements; I understand that this is not an exclusive listing of the job functions & that I am expected to complete all duties as assigned; I understand the job functions may be altered by management without notice. I have received my copy of same.

Joyce Hunt
Administrator

7/20/09
Date

copies: Personnel File
Employee

Sterling Healthcare, Inc.
Job Description

Job Title: Administrator

Department: Administration

Supervisor: Regional Manager

Working Hours: Full time forty (40) hours per week. Usually Monday through Friday, must work occasionally after normal hours as necessary to accomplish the responsibilities of the job: is expected to work some weekends, evening & nights in order to adequately supervise.

Qualifications: Must be currently licensed in state the facility is located. Two years of long term care experience preferred. Organizational and leadership ability, genuine interest & concern for working with the elderly.

Job Summary: Contributes to the physical, mental, emotional & spiritual well being of the residents by coordination, supervision & directing of all facility personnel: must maintain the dignity, respect & privacy, at all times for the resident & staff; works with all facility departments to provide overall care & comfort for each resident.

Job Duties:

1. Managing of the ongoing functions of the Nursing Center as required to fulfill all regulations of local, county, state and federal agencies.
2. Employs an adequate number of appropriately trained professional & auxiliary personnel including the appropriated delegations of duties to ensure the needs of the residents are met.
3. Ensures the public information describing the services of the Nursing Center is accurate.
4. Ensures each resident's right to fair & equitable treatment, self determination, individuality, privacy, property and civil rights
5. Ensures each resident & their families of their right to lodge a complaint without fear or reprisal & to expect a reasonable response to such complaints
6. Ensures each resident of their right to maintain a lifestyle which is respected by all & to maintain said lifestyle within reasonable parameters as defined by their physical & mental ability
7. Enforces the rule & regulations of the *Long Term Care Facilities Residents Bill of Right's*
8. Ensures the implementation of established resident care policies, personnel policies, preparations of budget, etc.
9. Serving as liaison to the Board of Directors, Medical Staff, Professional Staff, & other Supervisory Staff
10. Evaluates & as deemed appropriate implements those recommendations from the Nursing Center's QA Committees.

Sterling Healthcare, Inc.
Job Description

11. Ensures the Nursing Center admits only those residents for whom it can provide adequate care, and:
12. Maintains his/her professional status through periodic educational & professional activities as required by state law
13. All other duties as deemed necessary & assigned by the Regional Manager

Responsible for:

1. Treating all residents, employees, visitors with respect & dignity.
2. Knowing & protecting all residents right's.
3. Organizing & directing the operation of the facility; defining lines of authority & delegation of duties.
4. Serving as a member of the facilities Admission & Discharge Committee.
5. Maintains supplies & equipment necessary for the efficient operation of the Nursing Center.
6. Enforcement of the facility's policies & procedures related to personnel & safety matters.
7. Presenting a favorable image to the residents, visitors, and general public.

Working Conditions: Works in well lighted, well ventilated area. May stand, stoop, bend & walk approximately 75 to 80 percent (75-80%) of the workday. May be subject to the behavior of confused or disoriented resident. This job may be subject to the risk of occupational exposure of potentially infectious material. Is not considered an "at risk" position.

I have read & understand this job description & its requirements; I understand that this is not an exclusive listing of the job functions & that I am expected to complete all duties as assigned; I understand the job functions may be altered by management without notice. I have received my copy of same.

_____ _____

Administrator Date

copies: Personnel File
Employee

EXHIBIT 19

Please print clearly. Incomplete forms will delay processing

CONFIDENTIAL

Guardian Group Plan Number: 00461022

GUARDIAN®

Employer:
Sterling Healthcare Incorporated
16 Norcross Street
Suite 50 B
Roswell, GA 30075

The Guardian Life Insurance Company of America

EMPLOYER USE ONLY ☑ New Application ☐ Add Dependent(s) ☐ Drop Dependent(s) ☐ Change Address
☐ Change Name ☐ Drop Coverage as of: / /

Class	Hours Worked	Division	Benefits Effective
1			/ /

Keep a copy for your records and return form to: Midwest Regional Office, P.O. Box 8012, Appleton, WI 54912-8012

ABOUT YOURSELF

First, Middle Initial, Last Name ☑ Add ☐ Change ☐ Drop

[redacted]

Preferred E-mail

[redacted]

Job Title: C.N.A.

Work Status: ☑ Full-Time ☐ Part-Time ☐ Retired ☐ COBRA/State Continuation

Date work status began: 08 / - 2009

Annual Salary/Earnings: [redacted]

Are you married? ☐ Yes ☑ No

Do you have children or other dependents? ☐ Yes ☐ No

ABOUT YOUR DEPENDENTS

	Sex	Date of Birth (mm/dd/yyyy)	Social Security Number	Marriage Date (mm/dd/yyyy)
Spouse First, Middle Initial, Last Name ☐ Add ☐ Change ☐ Drop	☐ M ☐ F	/ /		/ /

NO Dependants

	Sex	Date of Birth (mm/dd/yyyy)			
Child 1 ☐ Add ☐ Change ☐ Drop	☐ M ☐ F	/ /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					
Child 2 ☐ Add ☐ Change ☐ Drop	☐ M ☐ F	/ /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					
Child 3 ☐ Add ☐ Change ☐ Drop	☐ M ☐ F	/ /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					
Child 4 ☐ Add ☐ Change ☐ Drop	☐ M ☐ F	/ /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					

To drop coverage for yourself or your dependents, check the box(es) to the right of the name(s) and select the coverage(s) to drop below. Attach a separate sheet if you wish to drop more than one dependent from different coverages.
☐ Dental ☐ Vision ☐ Critical Illness

A dependent is a person that you, as a taxpayer, claim; who relies on you for financial support; and for whom you qualify for a dependency tax exemption. Dependency tax exemptions are subject to IRS rules and regulations. Additional information may be required for non-standard dependents such as a grandchild, a niece or a nephew.

CONFIDENTIAL

Please print employee name:

Guardian Group Plan Number: 00461022

IMPORTANT NOTES

- Proof of insurability does not apply to vision, but if you waive vision coverage and later decide to enroll, you may be subject to delays in enrollment.
- Your plan includes a One Year Lock-In/Lock-Out Provision - Your election to enroll in or waive vision coverage must remain in effect until your plan's next annual vision enrollment period.

SIGNATURE

- I hereby apply for the group benefit(s) that I have chosen above.
- I understand that I must meet eligibility requirements for all coverages that I have chosen above.
- I understand that my dependent(s) cannot be enrolled for a coverage if I am not enrolled for that coverage.
- I agree that my employer may deduct premiums from my pay or add premiums to my dues; if they are required for the coverage I have chosen above.
- I acknowledge and agree that Guardian may provide me information concerning benefits, including explanation of benefit statements and other claims related information soley in electronic format as permitted by law. I may change this election only by providing Guardian thirty (30) day prior written notice.
- I understand that the premium amounts shown above are estimations. If the premium amounts shown above and the deductions for premiums shown on my paycheck stub do not agree, my paycheck stub will prevail. I understand that the premium amounts may be amended.
- Any person who with intent to defraud or knowing that he/she is facilitating a fraud against an insurer, submits an application or files a claim containing a false or deceptive statement may be guilty of insurance fraud.

SIGNATURE OF EMPLOYEE X [redacted] DATE Oct. 13, 2010

CONFIDENTIAL

Sterling Healthcare, Inc.

Insurance Selections and Payroll Deduction

Employee: [redacted]
Employee SSN:
Employee DOB:

Location: CountryWood
Print Date: 12/27/10

	Policy Effective Date	Plan Description	Coverage Amounts	Monthly Premium & Fees	Monthly Employer Contrib	Semi-Monthly Payroll Deduc
				-	-	-
				-	-	
				-		
				-		
Vision	01/01/11	EE		[redacted]		[redacted]
Dental	01/01/11	EE		[redacted]		[redacted]
Insurance fee				[redacted]		[redacted]
Plan Totals				[redacted]	-	[redacted]

Pre-Tax Deduction Amount [redacted]
After Tax Deduction Amount

THIS AMOUNT WILL BE DEDUCTED FROM THE EMPLOYEE'S SEMI-MONTHLY PAYCHECK: [redacted]

Manual Deduc: [redacted]

Employee Signature & Date [redacted]

Prepared By & Date

Reviewed and Approved By & Date

IMPORTANT:
By signing this form you are authorizing the company to deduct the above amount from your paycheck for payments of your selected insurance coverage. There are certain qualifying events (e.g.: births, adoptions, deaths, marriage, divorce) that will permit you to modify one or more of these policies. Premiums for some policies are being deducted from your payroll on a pre-tax basis. Consequently, except for these qualifying events, by IRS regulations, these deductions can only be discontinued or modified during annual enrollment periods.

In the event that there have been small errors in calculations or the information provided by the employee is found to be inaccurate, minor modifications to this deduction can be made after notification to the employee. Changes to any of these programs or the employer's contribution to the programs can be made at any time. The employer will provide appropriate notification to the employee prior to implementing any significant changes.

The BCBS, Aetna, MIP and Group Dental plans are group plans. You will be responsible for the full premium under certain circumstances (e.g.: leave of absence). These plans may be continued after your employments ends under COBRA regulations. The cancer, disability, term life, Aeola term life and individual dental policies are individual policies and may be continued after your employment ends through direct payments to the insurance company.

If, for any reason, your wages fall below the amount required to be deducted by these plans, the employer can choose to seek reimbursement from you and/or refuse to pay the premiums on the employee's policy resulting in termination of coverage.

Please print clearly to ensure accurate processing

CONFIDENTIAL

GUARDIAN®

The Guardian Life Insurance Company of America

Guardian Group Plan Number: 00461022

Employer:
Sterling Healthcare Incorporated
16 Norcross Street
Suite 50 B
Roswell, GA 30075

EMPLOYER USE ONLY ☑ New Application ☐ Add Dependent(s) ☐ Drop Dependent(s) ☐ Change Address ☐ Change Name ☐ Drop Coverage as of: / /

Class	Hours Worked	Division	Benefits Effective
1	40	HOPKINS	/ /

Keep a copy for your records and return form to: Midwest Regional Office, P.O. Box 8012, Appleton, WI 54912-8012

ABOUT YOURSELF

First, Middle Initial, Last Name ☐ Add ☐ Change ☐ Drop	Sex	Date of Birth (mm/dd/yyyy)	Social Security Number
[redacted]	☐ M ☑ F	[redacted]	[redacted]

Address	City	State	Zip
[redacted]	[redacted]		[redacted]

Preferred E-mail	Day Phone	Eve Phone	The best way to reach you: ☐ E-mail ☐ Day Phone ☐ Eve Phone
	[redacted]		

Job Title	Work Status	Date work status began	Annual Salary/Earnings
CNA	☑ Full-Time ☐ Part-Time ☐ Retired ☐ COBRA/State Continuation	9 / 19 / 08	$ [redacted]

Are you married? ☐ Yes ☑ No

Do you have children or other dependents? ☐ Yes ☐ No

ABOUT YOUR DEPENDENTS If you will not be adding any dependents, skip this section.

	Sex	Date of Birth (mm/dd/yyyy)			
Spouse First, Middle Initial, Last Name ☐ Add ☐ Change ☐ Drop	☐ M ☐ F	/ /	Social Security Number - -	Marriage Date (mm/dd/yyyy) / /	
Child 1 ☐ Add ☐ Change ☐ Drop	Sex ☐ M ☐ F	Date of Birth (mm/dd/yyyy) / /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					
Child 2 ☐ Add ☐ Change ☐ Drop	Sex ☐ M ☐ F	Date of Birth (mm/dd/yyyy) / /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					
Child 3 ☐ Add ☐ Change ☐ Drop	Sex ☐ M ☐ F	Date of Birth (mm/dd/yyyy) / /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					
Child 4 ☐ Add ☐ Change ☐ Drop	Sex ☐ M ☐ F	Date of Birth (mm/dd/yyyy) / /	☐ Full-time student, at (school):	City/State:	Attending Since / /
State of Residence:					

To drop coverage for yourself or your dependents, check the box(es) to the right of the name(s) and select the coverage(s) to drop below. Attach a separate sheet if you wish to drop more than one dependent from different coverages.
☐ Dental ☐ Vision ☐ Critical Illness

A dependent is a person that you, as a taxpayer, claim; who relies on you for financial support; and for whom you qualify for a dependency tax exemption. Dependency tax exemptions are subject to IRS rules and regulations. Additional information may be required for non-standard dependents such as a grandchild, a niece or a nephew.

Guardian Group Plan Number: 00461022

CONFIDENTIAL

Please print employee name:

IMPORTANT NOTES

- Proof of insurability does not apply to vision, but if you waive vision coverage and later decide to enroll, you may be subject to delays in enrollment.
- Your plan includes a One Year Lock-In/Lock-Out Provision - Your election to enroll in or waive vision coverage must remain in effect until your plan's next annual vision enrollment period.

SIGNATURE

- I hereby apply for the group benefit(s) that I have chosen above.
- I understand that I must meet eligibility requirements for all coverages that I have chosen above.
- I understand that my dependent(s) cannot be enrolled for a coverage if I am not enrolled for that coverage.
- I agree that my employer may deduct premiums from my pay or add premiums to my dues; if they are required for the coverage I have chosen above.
- I acknowledge and agree that Guardian may provide me information concerning benefits, including explanation of benefit statements and other claims related information soley in electronic format as permitted by law. I may change this election only by providing Guardian thirty (30) day prior written notice.
- I understand that the premium amounts shown above are estimations. If the premium amounts shown above and the deductions for premiums shown on my paycheck stub do not agree, my paycheck stub will prevail. I understand that the premium amounts may be amended.
- Any person who with intent to defraud or knowing that he/she is facilitating a fraud against an insurer, submits an application or files a claim containing a false or deceptive statement may be guilty of insurance fraud.

SIGNATURE OF EMPLOYEE X [redacted] DATE 1-18-11

DETACH ENTIRE FORM AND RETURN TO YOUR EMPLOYER

CONFIDENTIAL

Corporate Office
16 Norcross Street Suite 100
Roswell, GA 30075
(770) 993-4000
(770) 993-9014

Countrywood 006000

Record on Appeal-Page 302

To Whom It May Concern:
This is to state that I: [redacted] SS # [redacted]

Date: 11/22/13

Employed at: Countrywood Nursing Center

1. Desire to Discontinue the following Insurance during during the Open Enrollment

[ ] Medical [ ] MIP [ ] United [ ] FHC
[ ] CHC [ ] BC/BS
[ ] Family Accident
[ ] Term Life
[ ] Short Term Disability
[ ] Cancer
[ ] Dental
[ ] Vision

1. Desire to Continue the following insurance during the Open Enrollment

[ ] MIP

[ ] Family Accodent
[ ] Term Life
[ ] Short Term Disability
[ ] Cancer
[✓] Dental
[✓] Vision

2. I understand that Open Enrollment is the only time I may discontinue any Pre Tax Insurance such as;

- Any Medical
- Dental
- Vision
- Cancer

CONFIDENTIAL

Sterling Healthcare, Inc. — Insurance Selections and Payroll Deduction

Employee: [redacted]
Employee SSN:
Employee DOB:

Location: CountryWood
Print Date: 12/09/11

	Policy Effective Date	Plan Description	Coverage Amounts	Monthly Premium & Fees	Monthly Employer Contrb	Semi-Monthly Payroll Deduc
United Healthcare	01/01/12	[redacted]		[redacted]	[redacted]	[redacted]
Insurance fee				[redacted]		[redacted]
Plan Totals				[redacted]		

Pre-Tax Deduction Amount: [redacted]
After Tax Deduction Amount:

THIS AMOUNT WILL BE DEDUCTED FROM THE EMPLOYEE'S SEMI-MONTHLY PAYCHECK: [redacted]

Manual Deduc: -

Employee Signature & Date: [redacted] 12/20/11

Prepared By & Date: [redacted] 12-8-11

Reviewed and Approved By & Date:

IMPORTANT:

By signing this form you are authorizing the company to deduct the above amount from your paycheck for payments of your selected insurance coverage. There are certain qualifying events (e.g.: births, adoptions, deaths, marriage, divorce) that will permit you to modify one or more of these policies. Premiums for some policies are being deducted from your payroll on a pre-tax basis. Consequently, except for these qualifying events, by IRS regulations, these deductions can only be discontinued or modified during annual enrollment periods.

In the event that there have been small errors in calculations or the information provided by the employee is found to be inaccurate, minor modifications to this deduction can be made after notification to the employee. Changes to any of these programs or the employer's contribution to the programs can be made at any time. The employer will provide appropriate notification to the employee prior to implementing any significant changes.

The BCBS, Aetna, MIP and Group Dental plans are group plans. You will be responsible for the full premium under certain circumstances (e.g.: leave of absence). These plans may be continued after your employments ends under COBRA regulations. The cancer, disability, term life, Aegis term life and individual dental policies are individual policies and may be continued after your employment ends through direct payments to the insurance company.

If, for any reason, your wages fall below the amount required to be deducted by these plans, the employer can choose to seek reimbursement from you and/or refuse to pay the premiums on the employee's policy resulting in termination of coverage.

Countrywood 004005

EXHIBIT 20

STERLING HEALTHCARE, INC.

EMPLOYEE LEAVE OF ABSENCE REQUEST

FAX COPY TO CORPORATE OFFICE ATT: BARBARA PORTERFIELD
WITHIN 24 HOURS OF REQUEST.

PLEASE MAIL ORGINAL

[redacted] 7-18-11
NAME DATE

Countrywood Nursing Center Skilled Nursing
FACILITY NAME DEPARTMENT

I REQUEST A LEAVE OF ABSENCE FROM 7-18-11 TO
OPEN FOR THE FOLLOWING REASON:

SIGNATURES: [redacted] 7-18-11
EMPLOYEE DATE

[signature] 7/18/11
DEPARTMENT HEAD DATE

[signature] 7/18/11
ADMINISTRATOR DATE

ATTACH DOCTOR'S EXCUSE IF APPLICABLE

CONFIDENTIAL

Country Wood Nursing Center

EMPLOYEE REQUEST FORM

For

PTO

Facility Country wood Employee Print [redacted]

Date 9/1/09 Department Nursing Shift Requesting PTO Third 11p-7A

Total hours requested 32 Dates Requested 10th/19, 20, 21, 22

Type: ____ Unscheduled ✓ Scheduled ____ LOA ____ FMLA ____ Remaining MBL'S ____

Supervisor will PTO result in Over Time ? NO Employee Signature Geneva Murray

APPROVAL

PTO days available 104.19 ~~87.28~~ Days after request 48.91 ~~55.83~~ Approved HR Tonya Dan Date 10/14/09

Supervisor Name, Print : Bill Litrell Approved ✓ Not Approved ____

Supervisor Signature [signature] Date 9/16/09

Administrator signature J.R. Hunt Date 10/31/09

If not approved state reasons : ____

NOTE: Forward to Sterling Health payroll Department for approval for administrator, director of nursing, and when requesting forty hours or more PTO.

Sterling Healthcare, Inc.

Application for Leave of Absence Under the Family and Medical Leave Act of 1993

I hereby make request for leave of absence under the Family and Medical Leave Act (FMLA 1993) for the following reason(s):

[redacted]

I understand I will BE REQUIRED to use my available PTO hours as part of my leave of absence under the FMLA. After I have exhausted my PTO hours, I understand that the remainder of the leave will be without pay.

I also understand that I am required to pay for my portion of any Health Insurance Premiums and if I fail to pay these premiums, that my health insurance coverage will either cease immediately, or at the Company's option it will pay my share and the Company will recover any such monies paid on my behalf. Further, if I fail to return to work after the expiration of the leave, I am expected to reimburse the Company for its share of the health insurance premiums, except under certain limited circumstances.

My Leave of Absence will begin on 7/18/11, and end / /

[redacted]
Employee Name (Please print)

[redacted]
Social Security Number

[redacted]
Employee's Signature

7-18-11
Date

[redacted]
Supervisor's Signature

7/18/11
Date

NOTE: If you wish to extend your unpaid leave of absence beyond the stipulated twelve (12) weeks provided under the FMLA, you may apply for another leave of absence now in addition to your FMLA leave or prior to the expiration of your FMLA leave.

The Company requests thirty (30) days written notice before a leave is begin if the need is foreseeable. If the thirty (30) day notice is not practicable, notice must be given as soon as practical. The Company also request updates on the FMLA every thirty (30) days on the status of your leave.

EXHIBIT 21

CONFIDENTIAL

This section for Corporate Use Only

Employee Termination Notice

This form should be used when reporting:

[X] *TERMINATIONS* [ ] *INSURANCE CANCELLATIONS* [ ] *NAME CHANGE* [ ] *TRANSFERS*

ALL report notices should be faxed to the Home Office within 24 hours of the Facilities knowledge of the event. No cover sheet is required.

Facility Name Countrywood Nursing Center *Report Prepared by* TEGRA DAVIS

Employee Name [redacted] *Date of Termination* 12-21-12

Last First

→→→→ *Title* CNA →→→→→→→→ *Date will receive last pay check* 8-10-12

DOH 6/3/11 *Employee SS#* [redacted] *Home Phone Number* [redacted]

Home Address: [redacted]

Reason for Termination: [ ] *Disability* [ ] *Layoff* [ ] *Reduced Hours* [ ] *Resignation* [X] *Termination**

**Write reason and if eligible for rehire:* Inability to work shifts needed since July. Will not return phone calls. Ineligible for rehire related to excessive absences (14 callouts in 14 months) per DON

INSURANCE CANCELED

Reason for Cancellation (Remember a qualifying event must be the only reason for canceling if not at open enrollment time) _____

TRANSFER (between facilities)

FROM _____ *TO* _____ *Date Transferred* _____

NAME CHANGE

Employee Name (as now listed) _____ *SS#* _____

Employee Name (after change) _____

Reason for Change _____ *Date of change* _____

FAX TO: Corporate Human Resources Coordinator @ (770) 993-9014.

Revised Oct 2012

EXHIBIT 22

CONFIDENTIAL

TO: GEORGE E. CLARK, CPA ATTN: PAYROLL FAX#: 678-904-6368

EMPLOYEE CHANGE SHEET FACILITY Countrywood Nursing Center

SECTION ONE: EMPLOYEE INFORMATION

EMPLOYEE SS#: _____ EMPLOYEE NAME: LAST [redacted]

FIRST _____

MIDDLE _____

SECTION TWO: TYPE OF CHANGE

___ NAME CHANGE: LAST _____ FIRST _____ MIDDLE _____

___ ADDRESS CHANGE: STREET _____ APT# _____

CITY _____ STATE _____ ZIP _____

DEPARTMENT - *PLEASE CHECK ONE OR MORE BOXES:*

☐ ACTIVITIES	☐ ADMISSIONS	☐ ADMINISTRATIVE	☐ ADMINISTRATOR
☐ CENTRAL SUPPLY	☑ CNA	☐ DIR. OF NURSING	☐ GPN
☐ HOUSEKEEPING	☐ LAUNDRY	☐ LPN	☐ MAINTENANCE
☐ MDS COORD.	☐ MED. RECORDS	☐ NURSING ADMIN.	☐ REC. THERAPY
☐ RESIDENT ASST.	☐ RESTORATIVE	☐ RN	☐ SOC. SERVICES
☐ STAFF COORD.	☐ STAFF DEVELOP.	☐ OTHER _____	

___ PTO FACTOR CHANGE: PTO FACTOR _____

___ FEDERAL TAX STATUS CHANGE: FEDERAL TAX STATUS ( )
FEDERAL EXEMPTIONS ( )

___ STATE TAX STATUS CHANGE: STATE TAX STATUS ( )
STATE EXEMPTIONS ( )

___ PAY RATE CHANGE: ( )SALARY _____ /YEAR

90 Day WAS [redacted] → WANT TO $ [redacted] - 9/11 7/8 MAKE

( )HOURLY _____ /HOUR REGULAR (SHIFT 1)
( )SHIFT DIFF-3/11 _____ (SHIFT 2)
11/7 _____ (SHIFT 3)
W/E _____ (W/E #1)
W/E 3-11 _____ (W/E #2)
W/E 11-7 _____ (W/E #3)
BAYLOR _____

SECTION THREE: APPROVAL INFORMATION

EFFECTIVE DATE: 5/1/12 APPROVED BY: [signature]

DATE FAXED TO PAYROLL CENTER: _____ BY: _____

ORIGINAL COPY RETAINED BY FACILITY

Received By: _____ Date _____

Please Sign

OK Wanda 5/1/12

Mary Green was over 10 years Experience. Based on CNA Pay Scale 5th so from 8.50 → 9.50) 90 days

Email of Law Clerk Emily Burgis
of February 24, 2016

Jennifer

From: Gee, Tanya Law Clerk (Emily Burgis) <tgeelc@sccourts.org>
Sent: Wednesday, February 24, 2016 4:30 PM
To: Jennifer; erin.coia@lewisbrisbois.com
Cc: Dickson, Edgar W. Law Clerk (Jenny Pittman)
Subject: Jean Watkins v. Sterling Healthcare, Inc.; 2014CP4005160; Motions to Compel

Follow Up Flag: Follow up
Flag Status: Flagged

Counselors,

Judge Dickson has decided to grant both of your Motions to Compel with the following note:

1. Defendant's Motion to Compel with regard to their request for "claims as to acts or omissions of others" is denied to the extent the Plaintiff's expert has already answered this request during his deposition.

Judge Dickson denies the Defendant's Motion for Sanctions and finds that it is premature at this time. Judge Dickson requests that each party submit proposed orders. I have copied his law clerk, Jenny, here. Please submit your proposed orders to her. Please let me know if you have any questions.

Thank you,

Emily

Emily Burgis
Law Clerk to the Honorable Tanya Gee
At-Large Judge, Seat 9
P.O. Box 192
1701 Main Street, Ste. 323
Columbia, SC 29202
Phone: (803) 576-1742
tgeelc@sccourts.org

CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

Plaintiff's Motion for Rule to Show Cause and Sanctions with Exhibits A-H of January 23, 2017

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND JEAN WATKINS, as Personal Representative of the Estate of Mildred Watkins, Plaintiff, vs. STERLING HEALTHCARE, INC., COUNTRY WOOD NURSING CENTER, LLC, and GUARDIAN RESOURCES, LLC, Defendants.	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT Case No.: 2016-CP-40-04463 **NOTICE OF MOTION AND MOTION FOR RULE TO SHOW CAUSE AND SANCTIONS**

RICHLAND COUNTY FILED
2017 JAN 23 PM 4:51
JEANNETTE W. McBRIDE C.C.P. & G.S.

TO: BRANTLEY ROWLEN, ESQUIRE AND LEAH PARKER, ESQUIRE, ATTORNEYS FOR DEFENDANTS:

WILL YOU PLEASE TAKE NOTICE that pursuant to Rule 37(b) of the South Carolina Rules of Civil Procedure, the Plaintiff, by and through her undersigned counsel, will move before the Presiding Judge of the Court of Common Pleas for the Fifth Judicial Circuit, on the tenth day after service hereof or as soon thereafter as counsel may be heard, for a Rule to Show Cause as to why the Defendants should not be held in contempt of Court and suffer sanctions for failure to comply with the Order of the Honorable Judge Edgar W. Dickson, signed on November 30, 2016. In support of this Motion, the Plaintiff shows the following to the Court:

1. An Order Granting Plaintiff's Motion to Compel Against all Defendants was signed by Judge Dickson on November 30, 2016. The same was filed by the Clerk of Court for Richland County on December 8, 2016. A copy of the Order is attached as Exhibit A.[1]

2. The Defendants failed to produce any of the documents or information required by

[1] Please note that this case has been restored to the docket pursuant to SCRCP 40(j). The case number on Judge Dickson's Order and all discovery documents and filings prior to the present motion reflect the previous case number, 2014-CP-40-05160.

the Court Order in the time period prescribed by Judge Dickson's Order.

3. The Defendants have failed to produce all of the documents and information referenced in the Order. A copy of Defendants' Supplemental Responses to Plaintiff's Interrogatories and Requests for Production Pursuant to the Order of Judge Dickson is attached at Exhibit B.

4. Counsel for the Plaintiff, Jennifer Purdy, submits an Affidavit, attached hereto as Exhibit C, which further supports this motion and details the failures of the Defendants to comply with the Order of Judge Dickson.

THERFORE, the Plaintiff requests that the Court grant this motion and enter an Order requiring all Defendants to appear and show cause as to why they should not be held in contempt of Court and incur sanctions, costs, attorney's fees, and such other and further relief in favor of the Plaintiff as the Court deems just and proper.

POPOWSKI, CALLAS & SHIRLEY, P.A.

Jennifer Randolph Purdy
Attorney for Plaintiff
P.O. Box 7397
Columbia, South Carolina 29202
(803) 799-2100 phone
(803) 254-0874 facsimile
Jennifer@pcslawyer.com

Columbia, South Carolina
January 23, 2017

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2014CP4005160

Jean Watkins Mildred Watkins PLAINTIFF(S)	Sterling Healthcare Inc Country Wood Nursing Center LLC DEFENDANT(S)

Submitted by: _____ | Attorney for : ☐ Plaintiff ☐ Defendant or ☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.

☐ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

☐ **ACTION DISMISSED** *(CHECK REASON)*: ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other _____

☐ **ACTION STRICKEN** *(CHECK REASON)*: ☐ Rule 40(j), SCRCP; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other _____

☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** *(CHECK APPLICABLE BOX)*: ☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☐ Statement of Judgment by the Court:

ORDER INFORMATION

This order ☐ ends ☐ does not end the case.
Additional Information for the Clerk : _____

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		$
		$
		$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. **Note: Title abstractors and researchers should refer to the official court order for judgment details.**

Circuit Court Judge _____ **Judge Code** 2153 **Date** _____

For Clerk of Court Office Use Only

This judgment was entered on the ____ day of _____, 20 ____ and a copy mailed first class or placed in the appropriate attorney's box on this 8 day of Dec, 2016 to attorneys of record or to parties (when appearing pro se) as follows:

Jennifer Randolph Purdy | Erin Lawson Coia | Leah Fox Parker

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter _____

Clerk of Court Jeanette W. Bradley

SCRCP Form 4C (10/2011)

"Exhibit A"

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND JEAN WATKINS, as Personal Representative of the Estate of Mildred Watkins, Plaintiff, vs. STERLING HEALTHCARE, INC., COUNTRY WOOD NURSING CENTER, LLC, and GUARDIAN RESOURCES, LLC, Defendants.	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT Case No.: 2014-CP-40-05160 **ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL AGAINST ALL DEFENDANTS**

RICHLAND COUNTY FILED
2016 DEC -8 PM 4:53
JEANNETTE C.C.P. & G.S. McBRIDE

The Plaintiff served all Defendants with discovery requests on or about August 22, 2014. The Defendants submitted partial responses on or about November 20, 2014, May 5, 2015, and September 25, 2015. However, all Defendants failed to fully answer all of Plaintiff's discovery requests. The Plaintiff filed a Motion to Compel on July 29, 2015 and this matter was heard on February 24, 2016. Both parties submitted a Memorandum in support of their positions. Present at the hearing were Jennifer Randolph Purdy, attorney for Plaintiff, and Erin Coia, attorney for Defendants. After review of the Memoranda and documents provided by counsel, and after hearing the arguments of counsel, this Court finds as follows:

AS TO ALL DEFENDANTS:

1. The Court finds that the Plaintiff is still without essential documents and information necessary to prepare her case or even take depositions of critical witnesses. The information withheld from the defense is essential to the Plaintiff's claim and there is no legitimate reason for the defense to withhold the same.

2. All Defendants are hereby ordered to fully and completely respond to Plaintiff's Interrogatories and Requests for Production, including but not limited to the specific items specified in Plaintiff's Memorandum in Support of her Motion to Compel and referenced in this Order.

3. The Plaintiff has demonstrated good cause to exceed fifty (50) Interrogatories and is hereby authorized by the Court to exceed fifty Interrogatories to each Defendant. Any Interrogatory not fully answered by the Defendants on the grounds that the maximum number of Interrogatories had been reached, along with any additional Interrogatories submitted by the Plaintiff, shall now be answered by each Defendant in their entirety.

4. Full and complete responses to all Interrogatories and Requests for Production shall be made by the Defendants within twenty (20) days of the date of this Order.

AS TO DEFENDANT COUNTRY WOOD INTERROGATORIES

5. Defendant Country Wood shall answer, in their entirety, all Interrogatories propounded to the Defendant, including those specifically referenced in Plaintiff's Memorandum in Support of Motion to Compel.

6. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #2. Additionally, this Order specifically directs the Defendants to produce any and all insurance documents, policies, endorsements, declarations pages, etc. which provide coverage of any type to any or all of the Defendants, owners, members, shareholders, key employees, etc., including but not limited to Robert Hagan.

7. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #3. Additionally, this Order specifically directs the Defendants to point to specific

evidence in support of their allegations that other individuals and/or entities are responsible for the Plaintiff's injures and death and/or to admit that there are no liable parties to this matter other than those already named in this litigation.

8. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #4. Additionally, this Order specifically directs the Defendants to provide the names of any and all witnesses to this matter, and specifically, all individuals who provided any care, treatment, or services to the Plaintiff while she was a resident of Country Wood, including but not limited to those individuals listed in Plaintiff's Memorandum. Defendant is further Ordered to provide employee files for these individuals, including but not limited to those individuals listed in Plaintiff's Memorandum, and to obtain the employee files from independent and contracted individuals and companies. Defendant is also ordered to provide complete and un-redacted contracts between the Defendants and independent contractors and companies providing services to Country Wood and its patients during the period of Plaintiff's residency.

9. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #6 and 30. This request further Orders the Defendant to provide a detailed response to this request and not merely refer the Plaintiff to Bates stamped items 002057-002059, which are not responsive to #30.

10. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatories #7, 8, 9, and 10. These Interrogatories relate to employees, administrators, consultants, and contract workers who had any involvement with the care and treatment of the decedent. The Court orders that the employment status, last known address and present employment be provided for all individuals who had any involvement with the decedent during her residency and that complete employment files be provided for the same. This Order includes,

but is not limited to the list of individuals provided by the Plaintiff in her Memorandum.

11. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #11, including but not limited to the complete employee files of independent contractors and companies providing care or services at Country Wood during the period of Plaintiff's residency. This specifically includes, but is not limited to employees of Evergreen Rehabilitation and Healthcare Services Group. The Court further orders that complete and un-redacted copies of all contracts between any and all Defendants and outside independent contractors and/or companies be produced.

12. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #23. This Order includes, but is not limited to the production of any and all manuals, handbooks, policies and procedures, guides, etc., including but not limited to: the Policy and Procedure Manuals for Nursing, Policy and Procedure Manual for Administration, and Employee Handbook / Manual. The copies should also include title pages, tables of contents, indexes, addendums, etc. for all manuals / handbooks in place for any and all Defendants during the period of Plaintiff's residency.

13. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #47. Additionally, this Order specifically directs the Defendants to point to specific evidence and provide documentation in support of their allegations that other individuals and/or entities are responsible for the Plaintiff's injures and death and/or to admit that there are no liable parties to this matter other than those already named in this litigation. Likewise, any and all opinions held by Defendants' expert related to this topic should be disclosed.

14. Defendant Country Wood is hereby Ordered to completely and fully respond to Interrogatory #53.

15. Defendant Country Wood is hereby Ordered to completely and fully respond to Supplemental Interrogatory #1. It is further ordered that any and all employees, administrators, contractors, staff who currently have, or who have ever had, email addresses in any way affiliated with Sterling and/or Guardian be disclosed with the email address, their position, and dates of employment.

AS TO DEFENDANT COUNTRY WOOD
REQUESTS FOR PRODUCTION

16. Defendant Country Wood shall answer, in their entirety, all Request for Production propounded to the Defendant, including those specifically referenced in Plaintiff's Memorandum in Support of Motion to Compel.

17. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #7. Additionally, this Order specifically directs the Defendants to produce any and all insurance documents, policies, endorsements, declarations pages, etc. which provide coverage of any type to any or all of the Defendants, owners, members, shareholders, key employees, etc., including but not limited to Robert Hagan.

18. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #10.

19. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #17. Additionally, Defendants are directed to produce any and all payroll documents for all staff, employees, independent contractors, administrators, owners, executives, etc. along with employee files for these individuals.

20. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #21. Defendants are Ordered to provide all documents responsive to this

request, including Quality Assessment and Assurance documents, and not merely documents related to similar incidents. Furthermore, directing the Plaintiff to government agencies for this information is not an adequate response.

21. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #23, 24, and 25 in their entirety for all Defendants.

22. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #27 in its entirety for all Defendants. It is further Ordered that a reference to government agencies is not a sufficient response, nor is a response only providing "similar incidents".

23. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #33 in its entirety for all Defendants. If there are no documents responsive to this request, it is hereby Ordered that the Defendants indicate whether such documents were ever created by Defendants and/or if such documents were created but have since been lost and/or destroyed by the Defendants.

24. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #39 in its entirety for all Defendants. This Order includes, but is not limited to the production of a complete copy of all handbooks, manuals, policy and procedure guides, including but not limited to those for Employees, Nursing and Administration. Defendants are directed to produce full and complete copies of all manuals, handbooks, etc., including title pages, tables of contents, indexes, addendums, etc. in place during the period of decedent's residency.

25. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #43 in its entirety for all Defendants.

26. Defendant Country Wood is hereby Ordered to completely and fully respond to

Request for Production #44 in its entirety for all Defendants. If Defendants assert that their expert is not in possession of such depositions, the expert is Ordered to provide the names and addresses and case names of counsel in possession of the same.

27. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #56 in its entirety for all Defendants. References to documents obtained independently by the Plaintiff are an insufficient response to this request. Likewise, documents only related to "similar incidents" are not a sufficient response to this request. All documents responsive to this request must be produced.

28. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #57 in its entirety for all Defendants. References to documents obtained independently by the Plaintiff and documents only related to "similar incidents" are an insufficient responses to this request. All documents responsive to this request must be produced.

29. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #66, 67, 68, and 69 in their entirety for all Defendants from 2005-present.

30. Defendant Country Wood is hereby Ordered to completely and fully respond to Request for Production #71 in its entirety for all Defendants from 2005-present. An answer directing the Plaintiff to the Secretary of State's office or other government agency is not a sufficient response. All documents should be produced in their entirety.

AS TO DEFENDANT STERLING
INTERROGATORIES

31. Defendant Sterling shall answer, in their entirety, all Interrogatories propounded to the Defendant, including those specifically referenced in Plaintiff's Memorandum in Support of Motion to Compel.

32. Defendant Sterling is hereby Ordered to completely and fully respond to

Interrogatory #3 in its entirety.

33. Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #4 in its entirety. Additionally, this Order specifically directs the Defendants to produce any and all insurance documents, policies, endorsements, declarations pages, etc. which provide coverage of any type to any or all of the Defendants, owners, members, shareholders, key employees, etc., including but not limited to Robert Hagan.

34. Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #5 in its entirety. Additionally, this Order specifically directs the Defendants to point to specific evidence in support of their allegations that other individuals and/or entities are responsible for the Plaintiff's injures and death and/or to admit that there are no liable parties to this matter other than those already named in this litigation.

35. Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #6 in its entirety. Additionally, this Order specifically directs the Defendants to provide the names of any and all witnesses to this matter, and specifically, all individuals who provided any care, treatment, or services to the decedent while she was a resident of Country Wood, including but not limited to those individuals listed in Plaintiff's Memorandum. Defendant is further Ordered to provide employee files for these individuals, including but not limited to those individuals listed in Plaintiff's Memorandum, and to obtain the employee files from independent and contracted individuals and companies. Defendant is also ordered to provide complete and un-redacted contracts between the Defendants and independent contractors and companies providing services to Country Wood and its patients during the period of the decedent's residency.

36. Defendant Sterling is hereby Ordered to completely and fully respond to

Interrogatory #8 in its entirety. This Order includes, but is not limited to the production of all payroll records for all individuals working at Country Wood during the period of the Plaintiff's residency.

37. Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #9 in its entirety. These Interrogatories relate to employees, administrators, consultants, and contract workers who had any involvement with the care and treatment of the Plaintiff. The Court orders that the employment status, last known address and present employment be provided for all individuals who had any involvement with the Plaintiff during her residency and that complete employment files be provided for the same. This Order includes, but is not limited to the list of individuals provided by the Plaintiff in her Memorandum.

38. Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #12, 14, 15, 28, 42, 48, and 49 in their entirety.

39. Defendant Sterling is hereby Ordered to completely and fully respond to Supplemental Interrogatory #1 in its entirety.

STERLING
REQUESTS FOR PRODUCTION

40. Defendant Sterling shall answer, in their entirety, all Requests for Production propounded to the Defendant, including those specifically referenced in Plaintiff's Memorandum in Support of Motion to Compel.

41. Defendant Sterling is hereby Ordered to completely and fully respond to Request for Production #2, 3, 5, and 6 in their entirety.

42. Defendant Sterling is hereby Ordered to completely and fully respond to

Request for Production #7 in its entirety. Additionally, this Order specifically directs the Defendants to produce any and all insurance documents, policies, endorsements, declarations pages, etc. which provide coverage of any type to any or all of the Defendants, owners, members, shareholders, key employees, etc., including but not limited to Robert Hagan.

43. Defendant Sterling is hereby Ordered to completely and fully respond to Request for Production #11, 12, 16, 17 18, 19, 21, 24, 25, 26, 34, 35, 38, 41, 43, 44, 67, 68, 69, 70, 71, and 72 in their entirety.

AS TO DEFENDANT GUARDIAN
INTERROGATORIES

44. Defendant Guardian shall answer, in their entirety, all Interrogatories specifically propounded to the Defendant, including those referenced in Plaintiff's Memorandum in Support of Motion to Compel.

45. Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #4 in its entirety. Additionally, this Order specifically directs the Defendants to produce any and all insurance documents, policies, endorsements, declarations pages, etc. which provide coverage of any type to any or all of the Defendants, owners, members, shareholders, key employees, etc., including but not limited to Robert Hagan.

46. Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #5 in its entirety. Additionally, this Order specifically directs the Defendants to point to specific evidence in support of their allegations that other individuals and/or entities are responsible for the Plaintiff's injures and death and/or to admit that there are no liable parties to this matter other than those already named in this litigation.

47. Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #5, 8, 14, 15, and 40 in their entirety.

48. Defendant Guardian is hereby Ordered to completely and fully respond to Supplemental Interrogatory #1 in its entirety.

GUARDIAN
REQUESTS FOR PRODUCTION

49. Defendant Guardian shall answer, in their entirety, all Requests for Production propounded to the Defendant, including those specifically referenced in Plaintiff's Memorandum in Support of Motion to Compel.

50. Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #5, and 6 in their entirety.

51. Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #17 in its entirety. This Order includes but is not limited to the production of all payroll documents and employee files.

52. Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #18, 24, 25, 34, and 35 in their entirety.

53. Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #37 in its entirety. This Order includes but is not limited to the production of all payroll information and employee files.

54. Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #43, 44, 67, 68, 69, 70, and 72 in their entirety.

IT IS SO ORDERED.

~~The Honorable~~ Edgar W. Dickson
Presiding Judge

November 30, 2016
Columbia, South Carolina

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	)	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT
JEAN WATKINS, as Personal Representative Of the Estate of Mildred Watkins, Plaintiff, v. STERLING HEALTHCARE, INC., COUNTRY WOOD NURSING CENTER, LLC, and GUARDIAN RESOURCES, LLC, Defendant.	)	CIVIL ACTION NO. 2014-CP-40-5160

DEFENDANTS' SUPPLEMENTAL RESPONSES TO PLAINTIFF'S INTERROGATORIES AND REQUESTS FOR PRODUCTION PURSUANT TO THE ORDER OF JUDGE DICKSON

COME NOW Defendants in the above-captioned civil action, and pursuant to Rules 33 and 34 of the South Carolina Rules of Civil Procedure and the November 30, 2016 Discovery Order of Judge Dickson, hereby provide their respective Supplemental Responses to Plaintiff's Interrogatories and Requests for Production, as follows:

DEFENDANT COUNTRY WOOD

INTERROGATORIES

Pursuant to the Discovery Order of Judge Dickson, Defendant Country Wood hereby supplements its Responses to Plaintiff's separately numbered Interrogatories as follows:

2.

Identify all insurance companies which provide any type of liability insurance coverage, including but not limited to first party liability policies, self-insured retention policies, liability policies covering individual employees, owners, members, shareholders or key individuals, and/or policies of excess and/or umbrella coverage, and set forth the numbers of policies

involved, the policy period dates, and the amounts of liability insurance coverage provided in these policies, including any deductibles.

Original Response: Defendant objects to Interrogatory No. 2 to the extent it calls for information that constitutes a legal conclusion. Defendant further objects on the grounds that Interrogatory No. 2 seeks information regarding this Defendant's insurer's attitudes towards questions of coverage, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ballard v. Allegheny Airlines, Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced herewith, but states that, for purposes of this claim, Defendant is self-insured.

Supplemental Response: Defendant refers Plaintiff to its Response to Request for Production No. 7, below.

3.

If you contend that some other person or legal entity is, in whole or in part liable to you or the party asserting a claim against you in this matter and/or you contend that said person or entity should be made a party to this lawsuit, identify such person or entity, describe the basis of said liability, and identify the name and current address of each witness who can testify as to each fact you rely upon for said contention.

Original Response: Defendant objects to Interrogatory No. 3 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objection, Defendant contends that any of Decedent's medical providers outside Country Wood could have caused the alleged injuries that

are the subject of Plaintiff's claims, including, but not limited to, Palmetto Health Richland, Capital City Ambulance, and Regional Ambulance Service. Defendant reserves the right to supplement this Response in accordance with the South Carolina Rules of Civil Procedure as discovery in this case proceeds.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, Defendant again states that discovery is still ongoing in this matter and does not have any additional discoverable information to disclose at this time. Defendant reserves the right and will supplement this Response in accordance with the South Carolina Rules of Civil Procedure if and when any discoverable information is obtained by Defendant.

Second Supplemental Response: Defendant contends that any of Decedent's medical providers outside Country Wood could have caused the alleged injuries that are the subject of Plaintiff's claims, including, but not limited to, Palmetto Health Richland, Capital City Ambulance, and Regional Ambulance Service. However, as Discovery is ongoing in this matter, Defendant is presently unaware of any specific evidence and/or of the relevance of any specific evidence in showing responsibility of other individuals and/or entities for Plaintiff's injuries and death. In the event such specific evidence is obtained and/or the relevance of existing evidence becomes known to Defendant, Defendant will seasonably supplement this Response.

4.

Give the names and address of each person known to the parties or counsel to be a witness concerning the facts of the case and/or that you intend to call as a witness at the trial of this case. For each person known to the parties or counsel to be a witness, set forth a summary sufficient to inform the other party of the important facts known to be observed by such witness.

indicate whether a statement has been taken from said party or witness, and provide a copy of any written or recorded statements taken.

Original Response: Defendant objects to Interrogatory No. 4 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 4 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant generally identifies employees of Country Wood, employees of Decedent's medical providers and Decedent's family members. In further response, Defendant is not aware of any statements taken of any of the aforementioned witnesses, except for those statements made in Plaintiff's medical records produced concurrently herewith.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, Defendant identifies the individuals below as potential witnesses to the facts of this case. All of these individuals are current or former employees of Country Wood or current or former therapists/ therapy assistants provided to Country Wood through a contract with Evergreen Rehabilitation. These individuals either provided care to Decedent while she was a resident of Country Wood or otherwise have knowledge of the care provided to Decedent while she was a resident of Country Wood. No statements have been taken from any of these witnesses except as contained in Decedent's medical records, which were previously produced, and each individual's personnel file, which are being produced herewith pursuant to a Consent Protective Order signed by counsel (except for those individuals provided by Evergreen, which counsel is

currently attempting to obtain and will provide upon receipt). All current employees may be contacted through counsel.

The individuals Defendant identifies as witnesses are as follows: Joe Hunt, Administrator; Dr. Steven Barnett; Bryan Harbison; Rebecca Deppe; William Litrell; Jacqueline Addison; Talicia Robinson; Betty Atkinson; Dianne Elliot; Becky Buhlinger; Neal Shephard; Marie Tinker; Latoya Davis; Josephine Sydnor; Marguerita Shaw; Mary Archie; Melissa Atkins; Lula Stroman; Rosa Sumter; Alice Harper; Michael Williams; Gloria Gilmore; Mary Green; Anita Simmons; Teresa Bristow; Felicia Jackson; Carmen Blevins; Charity Kennedy; Monica Gilmore; Caroline Wilson; Geneva Murray; Timeshay Brown; Chaundreka Shepard; Christy Samuels; Mary Harris; Pamela Low; Brittany Palmer; Vanessa Wall; Faith Huguenin; Edward Crowder; Daryl Hamptman; Darine Evans; Julie Dixon; Brittany Fleming; Erika Stack; Orissa Hewitt; Tegra Davis; Jennie Jordan; Tammy Adamson; Dominic Holman; Stanley Dove; Martrisa Greene; Lorena Green; Ellen Burden; and Dianne Hix. Defendant also identifies all of Decedent's outside medical providers identified in Decedent's medical records previously produced to Plaintiff, and all witnesses identified by Plaintiff in her discovery responses. Defendant reserves the right to further supplement this response as discovery in this case proceeds.

Second Supplemental Response: In addition to the witnesses identified in Defendant's first two Responses to the subject Interrogatory, Defendant identifies the following individuals provided by Evergreen: Mia McCall; Vickie Cannady; Stephanie Hale; Candace White; Crystal Coleman; Mary McGinn; and Erie Brown. Defendant reserves the right to further supplement this response as discovery in this case proceeds.

6.

Identify all photographs, plats, sketches, videotapes, audiotapes, pictures, nursing home records, nursing home bills, drawings, artist's renditions, x-rays, ultrasounds, diagrams, notes, measurements, statements, plats, laboratory slides, laboratory specimens, or laboratory "cuts", electronic data files, jpg files, data emails, web pages, brochures, information packets, or other documents or materials now or previously in possession, custody or control of the Defendant that relate to any claim or defense in the case and produce a copy of each.

Original Response: Defendant objects to Interrogatory No. 6 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 6 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith for information responsive to Interrogatory No. 6. Defendant reserves the right to supplement its Response to Interrogatory No. 6 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see the additional documents produced herewith, including page 2080 of Defendant's original document production, which was inadvertently disclosed as a blank page. After review of Defendant's original document production, Defendant believes that there were no documents contained on pages 2057 to 2060 and that there was an error in the numbering of the pages. Defendant reserves the right to supplement and amend this Response as discovery in this case proceeds.

Second Supplemental Response: Defendant refers Plaintiff to the documents previously produced pursuant to Defendant's Original and First Supplemental Response to this Interrogatory. Defendant also refers Plaintiff to its Response to Request for Production No. 7, below. In the event additional responsive information is identified, Defendant will seasonably supplement this Response.

7.

For each employee of the Defendant or person working at the Defendant's skilled nursing facility, who filled out any portion of, signed, or initialed the medical records of Mildred Watkins when she was a resident, identify the person, the official title or position, and whether the person was/is employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known. Furthermore, please identify each and every nurse, nurses' aide and/or CNA, who cared in any way for Mildred Watkins but whose name does not appear in the chart or medical records and state if that person was/is employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known.

Original Response: Defendant objects to Interrogatory No. 7 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced concurrently herewith for the identity of individuals who attended to, cared for and/or had contact with Decedent. Decedent was a resident of Defendant's facility for over eight (8) months and numerous individuals attended to her during her stay. Should Plaintiff propound a narrowly tailored interrogatory

and/or identify those employees she wishes to depose. Defendant will promptly provide additional information and advise as to their employment status.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this Response upon receipt.

Second Supplemental Response: Defendant refers Plaintiff to the medical records and personnel files previously produced and to Defendant's Response to Interrogatory No. 4, above. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this Response upon receipt. Additionally, pursuant to the Discovery Order of Judge Dickson, Defendant is working to locate current information regarding the employment status, present employment, and last known address for the numerous employees and former employees identified in Defendant's Responses, including Response to Interrogatory No. 4, above, and Defendant will supplement this Response with that information as it is obtained.

8.

For the time period of Mildred Watkins' stay, state the name, most current or last known address, social security number, professional registration/license number, title, position and dates employed for the following: administrator; head, charge and/or floor staff for the unit, wing, section or floor on which Mildred Watkins resided; and all dietary, nutrition or other consultants and, for each, indicate whether or not that person is still employed by the Defendant. If that

person is not presently employed by the Defendant, state the person's last known address and present employment, if known

Original Response: Defendant objects to Interrogatory No. 8 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 8 on the grounds it seeks to make confidential information, such as employee social security numbers, part of the written record Subject to and without waiving the foregoing objection, Defendant states that Joe Hunt was the Administrator of Country Wood during Decedent's residency and he maintains that position today. Mr. Hunt has worked in the assisted living/nursing home field for over forty (40) years. He holds a Dual License in skilled nursing and assisted living from the South Carolina Department of Labor, Licensing and Regulation Board of Long Term Health Care. Rebecca Deppe, RN, was the Director of Nursing at Country Wood during Decedent's residency and she maintains that position today. Mr. Hunt and Ms. Deppe may be contacted through undersigned counsel. In further response, Defendant refers Plaintiff to documents produced herewith. Defendant reserves the right to supplement its Response to Interrogatory No. 8 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Defendant further objects to providing any individual's social security number due to privacy and risk of identify theft. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this Response upon receipt.

Second Supplemental Response: Defendant renews its objection to providing any individual's social security number in the written record due to the privacy and identity theft risks. Subject to and without waiving this objection, Defendant refers Plaintiff to the personnel files of Joe Hunt and Rebecca Deppe, RN, previously produced pursuant to a Consent Protective Order signed by counsel. In further response, Defendant is still in the process of obtaining the personnel file for Dianne Hix and will supplement this Response upon receipt.

9.

For the time period of Mildred Watkins's stay, please state the name, last known or most current address, social security number, professional registration/license number and title for all personnel on duty, per shift on the floor, unit wing or section on which Mildred Watkins resided, who were responsible for transferring, repositioning and turning Mildred Watkins, monitoring Mildred Watkins, bathing Mildred Watkins, monitoring her skin, or otherwise providing care, treatment, and supervision and/for each, indicate whether or not that person is still employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known.

Original Response: Defendant objects to Interrogatory No. 9 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced concurrently herewith for the identity of individuals who attended to, cared for and/or had contact with Decedent. Decedent was a resident of Defendant's facility for over eight (8) months and numerous individuals attended to her during her stay. Should Plaintiff propound a narrowly tailored interrogatory

and/or identify those employees she wishes to depose. Defendant will promptly provide additional information and advise as to their employment status.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Defendant further objects to providing any individual's social security number due to privacy and risk of identify theft. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this Response upon receipt.

Second Supplemental Response: Defendant renews its objection to providing any individual's social security number in the written record due to the privacy and identity theft risks. Subject to and without waiving this objection, Defendant refers Plaintiff to the medical records and personnel files previously produced and to Defendant's Response to Interrogatory No. 4, above. Additionally, pursuant to the Discovery Order of Judge Dickson, Defendant is working to locate current information regarding the employment status, present employment, and last known address for the numerous employees and former employees identified in Defendant's Responses, including Response to Interrogatory No. 4, above, and Defendant will supplement this Response with any relevant information as it is obtained. In further response, Defendant is still in the process of obtaining the personnel file for Dianne Hix and will supplement this Response upon receipt.

10.

State the name, most current or last known address, social security number, professional license/registration number, title and dates employed for each individual who reported any

accident, injury, or change in condition of Mildred Watkins to her family and/or physician as well as the date, time and method of this notification.

Original Response: Defendant objects to Interrogatory No. 10 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced concurrently herewith for information responsive to Interrogatory No. 10. Defendant reserves the right to supplement its Response to Interrogatory No. 10 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Defendant further objects to providing any individual's social security number due to privacy and risk of identify theft. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this Response upon receipt.

Second Supplemental Response: Defendant renews its objection to providing any individual's social security number in the written record due to the privacy and identity theft risks. Subject to and without waiving this objection, Defendant refers Plaintiff to the medical records and personnel files previously produced and to Defendant's Response to Interrogatory No. 4, above. Additionally, pursuant to the Discovery Order of Judge Dickson, Defendant is working to locate current information regarding the employment status, present employment, and last known address for the numerous employees and former employees identified in Defendant's

Responses, including Response to Interrogatory No. 4, above, and Defendant will supplement this Response with any relevant information as it is obtained. In further response, Defendant is still in the process of obtaining the personnel file for Dianne Hix and will supplement this Response upon receipt.

11.

Identify by name, most current or last known address, social security number, professional license/ registration number, title and dates utilized, each and every administrator, caregiver, nurse, nurses' aide and/or CNA, who was provided to the Defendant by an outside agency or service, who provided care to Mildred Watkins as well as the name of the agency or service that provided each such person. Do not refer simply to the chart, as the chart does not necessarily contain this information. Produce a copy of any contracts between the Defendant and that agency or service.

Original Response: Defendant objects to Interrogatory No. 11 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced concurrently herewith for information responsive to Interrogatory No. 11. In further responses, Defendant states that occupational therapists, physical therapists and speech therapists are employed by Evergreen Rehabilitation. Defendant reserves the right to supplement its Response to Interrogatory No. 11 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Defendant further objects to providing any individual's social security number due to privacy and risk of identify theft. Subject to and without waiving

these objections. Defendant is in the process of obtaining the personnel files of each individual supplied through Evergreen and will supplement this Response upon receipt.

Second Supplemental Response: Defendant renews its objection to providing any individual's social security number in the written record due to the privacy and identity theft risks. Subject to and without waiving this objection, Defendant identifies the following persons supplied by Evergreen Rehabilitation: Mia McCall; Vickie Cannady; Stephanie Hale; Candace White; Crystal Coleman; Mary McGinn; and Eric Brown. Defendant refers Plaintiff to the personnel files for these persons, which are attached hereto. In further response, Defendant has previously produced the contract between Country Wood and Evergreen in response to Plaintiff's Interrogatory No. 26 and under the Consent Protective Order signed by counsel.

23.

Identify each rule, regulation, guidelines, instruction, protocol or other recommendation, manual, handbook, order or notice, or other document which relates to neglect, abuse, restraints, staffing or supervision, policies and procedures, documentation, care plans, hydration, nutrition, dementia care, skin care, medication administration, care of patients with mental conditions, physical therapy, occupational therapy, feeding tubes, catheters, accident prevention, infections, and/or infection control at the Defendant's facility in which was in effect for Mildred Watkins' residency and any changes since that time.

Original Response: Defendant objects to Interrogatory No. 23 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith for information

responsive to Interrogatory No. 23. Defendant reserves the right to supplement its Response to Interrogatory No. 23 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see additional Policies and Procedures documents, produced herewith.

Second Supplemental Response: Subject to and without waiving the foregoing objections, in addition to the documents previously produced, Defendant refers Plaintiff to select portions of Country Wood's Employee Handbook, produced herewith and marked "Confidential" in accordance with the parties' Consent Protective Order.

Third Supplemental Response: In addition to the documents previously produced, Defendant refers Plaintiff to Country Wood's Employee Handbook, produced herewith and marked "Confidential" in accordance with the parties' Consent Protective Order.

30.

Identify the staffing requirements for the Defendant as understood by the Defendant, at the Defendant's skilled nursing facility whether as mandated by the South Carolina Department of Health and Environmental Control or any other local, state or federal governmental agencies, or by the Defendant's own policies or guidelines, from January 1, 2005 through December 31, 2011, to include staffing categories and number of persons required for each category by shift.

Original Response: Defendant objects to Interrogatory No. 30 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 30 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving these objections, Defendant

states that it follows the staffing requirements mandated by the South Carolina Department of Health and Environmental Control, as revised over time. Defendant reserves the right to supplement its responses to Interrogatory No. 30 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see documents Bates-numbered Countrywood 002057 – 002059, produced as part of Defendant's (original) Responses to Plaintiff's First Requests for Production, which set forth the staffing requirements as understood by Defendant.

Second Supplemental Response: Defendant states that this Interrogatory has been fully answered. The staffing requirements requested are equally available to Plaintiff through the South Carolina Department of Health and Environmental Control.

47.

Detail your contention of how the Plaintiff sustained the injuries described in the Complaint which ultimately resulted in her death and state specifically and in detail what the claim or contention of the defendant will be regarding any cause or contributing cause of the injuries and ultimate death of the decedent, including a statement in detail of the facts or information upon which this contention is based.

Original Response: Defendant objects to Interrogatory No.47 to the extent that it calls for an expert medical opinion. Defendant objects to Interrogatory No. 47 on the grounds it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objection, discovery is in the earliest stages and

Defendant reserves the right to supplement its Response to Interrogatory No. 47 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, Defendant again states that discovery is still ongoing in this matter and does not have any additional discoverable information to disclose at this time. Defendant reserves the right and will supplement this Response in accordance with the South Carolina Rules of Civil Procedure if and when any discoverable information is obtained by Defendant.

Second Supplemental Response: Defendant has no additional discoverable information to disclose at this time. As Discovery is ongoing, Defendant will supplement this Response in accordance with the South Carolina Rules of Civil Procedure if and when any discoverable information is obtained by Defendant.

53.

Identify each and every employee of Defendant Sterling and Defendant Guardian who worked at Country Wood's facility in Richland County. State the dates said employee worked at Country Wood's facility and the jobs performed.

Original Response: Defendant objects to this Interrogatory as exceeding the number of Interrogatories allowed under Rule 33(b)(9) of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, and in a good faith effort to engage in discovery, no employee of Sterling or Guardian worked at the Country Wood facility during Decedent's residency.

Supplemental Response: No employee of Sterling or Guardian worked at the Country Wood facility during Decedent's residency.

Supp. 1.

Provide the email address of all administrators, employees, and staff working at Guardian during the period of Plaintiff's residency. This request does not seek personal email addresses, only email addresses which are in any way affiliated with Country Wood, Sterling and/or Guardian and employment therewith.

Original Response: Defendant objects to this Interrogatory on the ground that it exceeds the maximum number of interrogatories allowed under the South Carolina Rules of Civil Procedure. See S.C. R. Civ. P. 33(b)(9). Specifically, Plaintiff has already served this Defendant with 53 interrogatories in her initial discovery requests, and this Interrogatory constitutes her 54th interrogatory to this Defendant, not including subparts. Further, Plaintiff has not shown good cause and received the Court's permission to serve more than 50 interrogatories. Defendant further objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

REQUESTS FOR PRODUCTION

Pursuant to the Discovery Order of Judge Dickson, Defendant Country Wood hereby supplements its Responses to Plaintiff's Requests for Production as follows:

7.

Copy of the complete text, including all endorsements thereof, of any insurance policy which may be applicable to the Plaintiffs' claim.

Original Response: Defendant objects to this Request to the extent it calls for a legal conclusion. Defendant further objects on the ground that it seeks information regarding this Defendant's insurer's attitudes towards questions of coverage which is neither relevant nor likely to lead to the discovery of admissible evidence. See Ballard v. Allegheny Airlines, Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving these objections, Defendant refers Plaintiff to documents produced herewith, but states that, for purposes of this claim, Defendant is self-insured.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant is not in possession of any other documents responsive to this Request, other than the Certificate of Insurance previously produced.

Second Supplemental Response: Defendant has produced all responsive documents in its possession and reiterates that for purposes of this claim, Defendant is self-insured.

10.

Any and all documents relating to any and all persons or entities with an ownership or control interest; the officers, directors, members, agents or managing employees; the corporation, association, or other company responsible for management of the facility; and the administrator and director of nursing during Mildred Watkins' residence, as required by 42 CFR § 483.75(p), "Disclosure of Ownership." This would include but not be limited to a copy of an organizational charge of the Defendant showing structure, officers, and all inter-company departments and the titles of the heads of each department since January 1, 2005.

Original Response: Defendant objects to Request No. 10 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South

Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant states that Robert W. Hagan is the sole member and owner of Country Wood Nursing Center, LLC. In further response, Defendant refers Plaintiff to documents produced herewith for information regarding the facility's administrator and director of nursing. Defendant reserves the right to supplement its Response to Request No. 10 in accordance with the South Carolina Rules of Civil Procedure.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, all documents identifying Defendant's members may be obtained from the South Carolina Secretary of State. Defendant does not have these documents or any organizational chart in in its possession. However, Defendant refers Plaintiff to its Supplemental Response to Interrogatory No. 17 above for a listing of all department heads at its facility.

Second Supplemental Response: Defendant does not possess the documents sought by this Request but reiterates that it has previously provided a list of all department heads at its facility and documentation identifying Defendant's members may be obtained by Plaintiff from the South Carolina Secretary of State.

17.

All written or electronic documents, including but not limited to salary information, contracts and personnel files between the Defendant and the persons who served as its qualified dietician and director of food service at Country Wood during the period of Mildred Watkins's residency as required by law. This request seeks not only documents mentioning Mildred Watkins, but personnel file(s) and credentialing information.

Original Response: Defendant objects to Request No. 17 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 17 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 17 on the grounds it requests confidential information contained in personnel files, which is not automatically discoverable. Subject to and without waiving the foregoing objections, Defendant will produce non-confidential and relevant portions of this individual's personnel file upon the entry of a suitable Protective Order.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, which are being produced pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the personnel file of Dianne Hix and will supplement this Response upon receipt.

Second Supplemental Response: Defendant refers Plaintiff to the personnel files previously produced and produced herein. In the event additional responsive information is discovered, Defendant will seasonably supplement this Response.

21.

All quality assurance reports, documents, studies, complaints or incident investigation documents, pre-survey documents, survey prep documents, or any other similar documents, written or electronic, relating to Country Wood from January 1, 2005 - present in the possession or control of the Defendant. This would also include and not be limited to any and all internal

audits, whether computer audits or otherwise, relating to inspection readiness or preparedness, or in-house facility, visit reports or other documents, whether electronic or paper, regarding any issues. This would include the reports, on each area, as well as quality or assessment indicators used, such as program assessment tools. This includes but is not limited to any and all documents related to the Omnibus Budget Reconciliation Act, 42 CFR § 483.75(o), "Quality Assessment and Assurance."

Original Response: Defendant objects to Request No. 21 as overly broad and exceeding the scope of the South Carolina Rules of Civil Procedure, as it seeks information that is not narrowly tailored to the time of the period of events in question. Request No. 21 is also objectionable because it seeks information regarding prior and subsequent events, which are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. S.C. R. Evid. 404(b) & 407.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant refers Plaintiff to the documents from these agencies that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and documents produced herewith. Defendant does not have any records of similar incidents prior to 2011 in its possession, custody, or control.

Second Supplemental Response: Defendant refers Plaintiff to the Quality Assurance Meeting Minutes previously produced by Defendant. In further response, in light of the recent Discovery Order of Judge Dickson, Defendant states that it is in the process of determining whether it may possess any further responsive documentation and will further supplement this Response in the event such documentation is identified.

23.

All documents showing the net earnings, gross earnings, expenses, balance sheets, budgets and all other financial information regarding the Defendant, Defendant Sterling and or Defendant Guardian from January 1, 2005 – present, including but not limited to all documents of any budget planning and revision which were developed and/or implemented from January 1, 2005 – present. This request specifically includes, but is not limited to, any and all meeting minutes or notes, proposed budgets, amended and/or revised budgets, and other items which describe how the final approved budget was developed and implemented. Produce any documents pertaining to outside companies, entities, or individuals who have any control or input on budgets and financial decisions and identify said companies and/or individuals.

Original Response: Defendant objects to this Request as overbroad, as it seeks information that is not narrowly tailored to the period of the time of events in question. Defendant further objects to this Request on the grounds that it seeks documents from third parties whom this Defendant does not employ or otherwise control. Defendant also objects on the grounds that this Request seeks information regarding Defendant's financial condition, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Such information is also private, confidential, and otherwise subject to protection.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant states that it is currently in the process of determining whether it may possess any responsive documentation to this Request, and Defendant will seasonably supplement this Response in the event such documentation is identified.

24.

All document showing payment of any kind made by this defendant to any co-defendant from 2005 to the present and all documents identifying the basis for such payment, including but not limited to invoices, receipts, bills, contracts, agreements, etc.

Original Response: Defendant objects to Request No. 24 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 24 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 24 to the extent it seeks documents from third parties whom this Defendant does not employ or otherwise control. Defendant objects to producing documents regarding its financial condition, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Said information is also private, confidential, and otherwise subject to protection.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant has no documents responsive to this Request.

Second Supplemental Response: Defendant has no documents responsive to this Request.

25.

All documents showing payment of any kind paid to this defendant by any co-defendant from 2005 to the present and all documents identifying the basis for such payment, including but not limited to contracts, agreements, etc.

Original Response: Defendant objects to Request No. 25 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South

Carolina Rules of Civil Procedure. Defendant objects to Request No. 25 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 25 to the extent it seeks documents from third parties whom this Defendant does not employ or otherwise control. Defendant objects to producing documents regarding its financial condition, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Said information is also private, confidential, and otherwise subject to protection. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith for Country Wood's contract with Guardian.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant has no additional documents responsive to this Request.

Second Supplemental Response: Defendant has no additional documents responsive to this Request.

27.

Any and all incident/accident reports, unusual occurrence reports, or variance reports made to any federal, state or local government agency and/or any licensing authority or board pertaining to any incidents involving alleged neglect, abuse, staffing or supervision, policies and procedures, restraints, documentation care plans, hydration nutrition, dementia care, skin care, medication administration, care of patients with mental conditions, physical therapy, occupational therapy, feeding tubes, or the appropriateness of admitting and retaining demented and ambulatory residents' infections and/or infection control, at Country Wood and any of the Defendant's other facilities from January 1, 2005 - present, made in compliance with 42 CFR §

483.13(c)(4) and with the South Carolina Department of Health and Environmental Control, Regulation 61-17, Standards for Licensing Nursing Homes, Section B(7).

Original Response: Defendant objects to Request No. 27 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 27 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Specifically, Request No. 27 is not narrowly tailored to the period of the time or events in question and seeks information regarding residents other than Decedent and facilities other than the one at issue in this action. Such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Request No. 27 also seeks information regarding prior and subsequent events which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Evidence as to what may have occurred between one party and a third party with reference to a thoroughly distinct incident is irrelevant, not probative, and merely prejudicial.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant refers Plaintiff to the documents that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and additional documents produced herewith. Defendant does not have any records of similar incidents prior to 2011 in its possession, custody, or control.

Second Supplemental Response: Defendant refers Plaintiff to the responsive documents Defendant produced in its First and Supplemental Responses to Plaintiff's Requests for Production. In light of the recent Discovery Order of Judge Dickson, Defendant is in the process

of identifying and collecting additional responsive documentation to this Request, but as such documentation is neither narrowly tailored as to time or facility, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response as such documentation is located.

33.

All planned, budgeted or projected staffing schedules and/or assignments for personnel at Country Wood from January 1, 2005 – present, including, but not limited to, all monthly staff schedules for nurses, certified assistants, medication aides, or orderlies.

Original Response: Defendant objects to Request No. 33 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant does not currently possess documents responsive to Request No. 33, but reserves the right to supplement and amend its response to Request No. 33 in accordance with the South Carolina Rules of Civil Procedure should it discover responsive documents.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant states again that it is not in possession of documents responsive to this Request. Should Defendant discover responsive documents, it will further supplement its response to this Request as required under the South Carolina Rules of Civil Procedure.

Second Supplemental Response: Defendant states that it is not in possession of documents responsive to this Request. In light of the recent Discovery Order of Judge Dickson, Defendant is now working to determine whether any such documents were ever created, and

Defendant will seasonably supplement this Response with that information upon determining the answer to same.

39.

Any and all policies and procedures in effect during Mildred Watkins' stay regarding:

a. identification of abuse and neglect of resident;

b. any and all courses attended and/or completed by the Administrator(s) of the facility;

c. administration and/or monitoring of medications;

d. training of all direct care staff;

e. training specifically provided to nursing assistants or nurses' aides;

f. orientation program for new employees;

g. nutrition/hydration and nutritional supplements;

h. dementia care;

i. communication with families and physicians;

j. quality assurance;

k. staffing or supervision;

l. policies and procedures;

m. documentation;

n. care plans;

o. dementia care;

p. skin care;

q. physical therapy;

r. occupational therapy;

s. feeding tubes;

t. restraints;

u. infection and/or infection control;

v. admission, assessment and initial treatment care plans and corresponding documentation for newly admitted or readmitted residents;

w. obtaining, documenting and carrying out physicians' orders for treatment;

x. observing, documenting and reporting the condition of a resident;

y. receiving and responding to resident's complaints and/or recommendations, and complaints for those speaking on behalf of residents;

z. responding to and documenting an incident or unusual occurrence relating to a resident, including but not limited to deterioration in status and behavioral emergencies;

aa. chart audits for accuracy of information and completeness;

bb. assessing, evaluating and documenting a resident's nutritional status and dietary needs, including food and fluid intake;

cc. the development, updates and revisions of care plans including, but not limited to, notification of resident and family regarding care plan conferences;

dd. the protocol for initiating transfer to another facility or discharge once the Defendants are no longer able to control or improve a resident's condition;

ee. admission and retention of residents whose conditions worsen;

ff. re-evaluation of resident's condition upon change in condition;

gg. incident reports, including, but not limited to, any documents that reflect how, when, and why incident reports should be generated;

hh. as well as any changes to the same since that time.

ii. all documents required by the South Carolina Department of Health and Environmental Control, Regulation 61-17, Standards for Licensing Nursing Homes, § C, et seq., "Resident Care Policies."

Original Response: Defendant objects to Request No. 39 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 39 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant objects to Request No. 39 to the extent it seeks documents concerning subsequent remedial measures, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. S.C. R. Evid. 407. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, see additional Policies and Procedures documents, produced herewith.

Second Supplemental Response: Subject to and without waiving the foregoing objections, in addition to the documents previously produced, Defendant refers Plaintiff to selected portions of the Employee Handbook, produced herewith.

Third Supplemental Response: Defendant refers Plaintiff to the policies and procedures documents it produced in its Original Response and First and Second Supplemental Responses to this Request for Production. In light of the recent Discovery Order of Judge Dickson, Defendant is working to determine whether any additional responsive policy and procedure documents

exist, and in the event any additional documents are identified in Defendant's ongoing subsequent search, Defendant will seasonably supplement this Response with same.

43.

A copy of any and all depositions given by any officer, agent, and/or employee of the Defendant for the last 10 years in the possession or control of the Defendant, Defendant's counsel, or Defendant's agents and/or employees. If depositions have been given by these individuals which are not currently in the possession or control of the Defendant or Defendant's counsel for this case, provide the identity of attorney or other individual or entity who would have possession or control of the same.

Original Response: Defendant objects to Request No. 43 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 43 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 44 to the extent it seeks information regarding "prior bad acts," which is neither relevant nor reasonably calculated to lead to the discovery of evidence that would be admissible at trial. S.C. R. Evid. 404(b).

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant further clarifies that this Request is overly broad because it does not limit the scope of the topics for which she has requested deposition testimony. Defendant will consider supplementing upon receipt of a narrowly tailored Request from Plaintiff.

Second Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of identifying and collecting responsive documentation to

this Request, but as such documentation is neither narrowly tailored as to time or facility, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response as such documentation is located.

44.

A copy of any and all depositions given by any expert witness identified by the Defendant as well as a copy of any written report ever prepared by any expert witness.

Original Response: Defendant objects to this Request to the extent it requests the identity and opinions of any expert witness who is not expected to be called as a witness for trial. The identity of any expert who has been employed by Defendant to examine any aspect of the occurrence which is the subject of this suit, but who is not expected to be called at trial is not discoverable except upon a showing of exceptional circumstances. S.C. R. Civ. P. 26(b)(4)(B). Defendant further objects to this Request to the extent it seeks draft versions of expert reports, as such a request imposes a burden on this Defendant beyond that required by the South Carolina Rules of Civil Procedure. Subject to and without waiving these objections, at this time, Defendant has not yet identified any expert witnesses expected to testify at trial. Defendant reserves the right to supplement and/or amend its Response to this Request in accordance with the South Carolina Rules of Civil Procedure as discovery in this case proceeds.

Supplemental Response: Defendant has not yet identified any expert witnesses expected to testify at trial. Defendant reserves the right to supplement and/or amend its Response to this Request in accordance with the South Carolina Rules of Civil Procedure as discovery in this case proceeds.

56.

If the Defendant has been issued a deficiency, license violation, penalty or validated complaint finding with in the last five (5) years by the U.S. Department of Justice, the South Carolina Department of Health and Environmental Control and/or the South Carolina Long Term Care Ombudsman for any reason, including but not limited to:

a. failing to provide continuous supervision for any resident whose condition was such that her or her personal safety required such supervision;

b. failing to admit and retain only those persons whose needs can be met by the accommodations and services provided and specifically not admitting or retaining:

1. any person who is likely to endanger him/herself or others;

2. any person needing hospitalization or nursing home care;

3. anyone needing the continuous daily attention of a facility staff licensed nurse;

4. anyone not appropriate for the level of care, services, or assistance offered;

5. residents whose condition changes to a degree that nursing home care

or the daily attention of a nurse may be required.

c. failing to ensure that, when the provision of care/services in the facility does not meet the needs of the resident, or if any resident becomes in need of continuous medical or nursing supervision, or if the facility does not have the capability to provide necessary care services, the resident shall be transferred to a location which shall meet those needs;

d. failing to coordinate this transfer with the resident, next-of-kin/responsible party and sponsor;

e. failing to ensure that care/services were rendered effectively and safely and precautions taken for residents with special conditions, e.g., Alzheimer's disease and/or related dementia, etc. and to provide appropriate assistance in activities of daily living as needed;

f. failing to properly monitor resident's physical well-being while residing at the defendant's facility;

g. failing to properly supervise the personnel and staff and employees at the Defendant's nursing facility with regard to residents' care;

h. failing to properly revise and modify plans of care for residents in response to their needs;

i. failing to properly utilize equipment, including medications and devices to prevent and to minimize or reduce injuries resulting from improper care;

j. violating state and/or federal regulations requiring actions to protect the safety and health of residents, so as to constitute negligence per se.

k. failing to ensure that the Defendant's personnel and employees had sufficient, adequate and current training, credentials and skills to properly prevent residents from suffering from injury and pain;

l. failing to have in place proper and adequate policies, procedures, protocols, rules and regulations for the care and treatment of nutritional and infection control issues and fall prevention issues at the Defendant's facility, or if such policies,

procedures, protocols, rules and regulations were in place, in failing to enforce them;

m. failing to properly and adequately assess, monitor and update policies, procedures, protocols, rules and regulations in response to knowledge garnered from published guidelines and case reviews relating to proper nutritional and infection control procedures and fall prevention procedures.

n. failing to ensure that manuals, instructions and warnings relating to appropriate nutrition and infection control procedures and fall prevention procedures were available to agents, servants and employees of the Defendant.

o. failing to properly train and education its employees or, if properly trained and educated, in failing to allow its employees to exercise independent skill and judgment;

p. failing to ensure that residents had proper care;

q. failing to properly document significant clinical findings;

r. failing to properly document the medical records of the patient;

s. failing to follow and ensure that its employees follow the South Carolina Residence Bill of Rights for Long Term Care Facilities, South Carolina Department of Health and Environmental Control Regulation 61-17, and the Federal OBRA Regulations 42 CFT §483.15m et seq.;

t. violating 42 CFR §483.30 which deems it necessary for the facility to have sufficient nursing staff to provide nursing and related services to attain or maintain the highest practicable physical, mental and psychosocial well-being of each resident as determined by resident assessments and individual plans of care;

u. failing to follow 42 CFR § 483.10 regarding residents right to a dignified existence including but not limited to notification of changes, which requires the Defendant to immediately consult with a resident's physician and notify a resident's legal representative when there is a significant change in the resident's physical, mental or psychosocial status or a need to alter treatment significantly due to adverse consequences;

v. failing to comply with 42 CFR § 483.15, which requires the facility to care for its residents in a manner and environment that maintains or enhances each resident's dignity and respect and full recognition of his or her individuality, failing to accommodate needs, in particular failing to provide services at the facility that reasonably accommodate individual's needs and preferences;

w. failing to provide medically related social services to attain or maintain the highest practical physical, mental or psychosocial well-being of the resident;

x. failing to comply with 42 CFR § 483.20, resident's assessments, which requires the facility to conduct initially and periodically a comprehensive accurate standardized reproducible assessment of each resident's functional capacity which must include but not be limited to psychosocial well-being;

y. failing to comply with 42 CFR § 483.25 quality of service, which requires that each resident much receive and the facility must provide necessary care and services in accordance with the comprehensive assessment and plan of care;

z. failing to comply with 42 CFR § 483.25, nutrition, which requires the facility to ensure a resident maintains acceptable parameters of nutritional status such as

body weight and protein levels and receives a therapeutic diet when there is a nutritional problem;

aa. failing to comply with 42 CFR § 483.30, nursing services, which requires sufficient staff;

bb. failing to comply with 42 CFR § 483.35, dietary services, which requires that the facility provide each resident with a nourishing, palatable, and well balanced diet that meets the daily nutritional and special needs of each resident.

cc. failing to comply with 42 CFR § 483.10c, client records, which requires that the facility must develop and maintain a recordkeeping system that documents the client's healthcare, active treatment, social information and protection of the client's rights;

dd. failing to comply with 42 CFR § 483.65, infection control, the facility must establish and maintain an infection control program designed to provide a safe, sanitary and comfortable environment;

ee. failing to comply with 42 CFR §483.25c pressure sores, based on the Comprehensive Assessment of a resident, the facility must ensure that a resident who enters the facility without pressure sores does not develop pressure sores unless the individual's clinical condition demonstrates that they were unavoidable; and a resident having pressure sores receives the necessary treatment to promote healing, prevent infection and prevent new sores from developing.

ff. failure to provide sufficient number of personnel to meet the needs of residents;

gg. failure to ensure that a resident maintains acceptable parameters of nutritional status, such as body weight and protein levels, unless the resident's clinical conditions demonstrate that this is not possible;

hh. failing to ensure that all alleged violations involving mistreatment, neglect, or abuse, including injuries of unknown source are reported immediately to the administrator of the facility and to other officials in accordance with State Law through established procedures (including to the State survey and certification agency);

ii. failing to conduct assessments promptly after a significant change in the resident's physical or mental condition;

jj. failing to conduct assessments promptly after a significant change in the resident's physical or mental condition;

kk. failing to notify family members or authorities after incidents;

ll. failing to properly monitor residents' physical well-being;

mm. failing to properly supervise the personnel and staff and employees at the Defendants' facilities;

nn. failing to properly revise and modify plans of care;

oo. failing to properly utilize equipment, including medications and devices to prevent and to minimize or reduce injuries resulting from improper care;

pp. violating state and/or federal regulations requiring actions to protect the safety and health of residents;

qq. failing to ensure that the Defendant's personnel and employees had sufficient, adequate and current training, credentials and skills to properly prevent residents from suffering from injury and ultimately, death;

rr. failing to have in place proper and adequate policies, procedures, protocols, rules and regulation for the care and treatment of nutritional and infection control procedures as the Defendant's facility;

ss. failing to properly and adequately assess, monitor and update policies, procedures, protocols, rules and regulations in response to knowledge garnered from published guidelines and case reviews relating to proper nutritional and infection control procedures;

tt. failing to ensure that manuals, instructions and warnings relating to appropriate nutrition and infection control procedures were available to agents, servants and employees of the Defendant.

uu. failing to properly train and education its employees or, if properly trained and educated, in failing to allow its employees to exercise independent skill and judgment;

vv. failing to properly document significant clinical findings;

ww. failing to properly document the medical records of the patient;

produce all documentation in any way relating to the above including but not limited to documents from the South Carolina Department of Health and Environmental Control or any other local, state or federal government agency, including but not limited to the United States Department of Justice, which set forth investigations, plans of correction evidence, findings, conclusions, violations deficiencies, penalties, actions, and/or recommended sanctions or actions

regarding the Defendant between the dates of January 1, 2005 – present. This request includes but is not limited to, any of the following documents:

a. reports of contact and summaries including any other document prepared by the Long Term Care Unit Program Administrator or her designee outlining sufficient deficiencies during licensor inspection survey inspection of care and/or complaint investigation.

b. Statements of Deficiencies and Plan Correction (HCFA Form 2567)

c. Intermediate Facility Survey Reports-Part B (HCFA Form 1539)

d. Part A Administrative Procedural Requirement Medicare/Medicaid survey Reports (HCFA Form 525);

e. Long Term Care Surveys-Part B;

f. Post Certification Revisit Reports;

g. Adverse Action Extracts (HCFA Form 462)

h. Federal Monitor Surveys;

i. Licensing Inspection Reports (HDH Form X-4)

j. Administrative Penalty Reports;

k. Administrative Penalty Review Reports;

l. Administrative Penalty Workbooks;

m. any and all Findings of Fact, Conclusion of Law or orders issued by the South Carolina Department of Health and Environmental Control;

n. receipts from South Carolina Department of Health and Environmental Control evidencing payment of any administrative penalties;

o. complaint investigation deficiencies, including supporting narratives from investigators or surveyors, as well as any follow-up report/findings;

p. any narratives or similar paperwork by a surveyor or inspector to further describe conditions found at the facility including reports of a special or non-routine inspection;

q. notifications of denial or re-certification, de-certification, the invoking of a cancellation clause, placement on the punitive action list, and;

r. all documents not listed above which were created by the U.S. Department of Justice, South Carolina Department of Health and Environmental Control, or any other governmental agency during their respective surveys, licensor inspection, penalty investigation, incident investigations, follow-up visits or on-site inspection s of the Defendant, such as:

1. any field notes, list of violations or deficiencies, handwritten notes or findings by inspectors or surveyors;

2. any narratives or papers written to further describe conditions found to exist at the Defendant's facilities by surveyors or inspections;

3. RN note worksheets;

4. tour note worksheets (HCFA 251)

5. observation/interview records-review worksheets;

6. discharge record analyses;

7. physical environment tour note worksheets;

8. dining area eating assistant worksheets;

9. drug pass worksheets (HCFA Form 522);

10. drug review notes;

11. residents selected for in-depth review; and

12. pharmacy record review summaries.

Original Response: Defendant objects to Request No. 56 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 56 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant refers Plaintiff to the documents from these agencies that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and additional documents produced herewith. Defendant does not have any records of similar incidents prior to 2011 in its possession, custody, or control.

Second Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of determining whether any additional responsive documentation to this Request exists, but as such documentation is not tailored to similar incidents. Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response in the event responsive documentation is located.

57.

All documents relating to any inspection/survey undertaken by the South Carolina Department of Health and Environmental Control's survey which occurred during Mildred Watkins' residency finding that Defendant:

a. **failed** to hire only people who have no legal history of abusing, neglecting or mistreating residents; or report and investigate any acts or reports of abuse, neglect or mistreatment of residents;

b. **failed** to give each resident a special diet to help when there is a nutritional problem;

c. **failed** to give professional services that meet a professional standard of quality;

d. failed to make sure each resident is being watched and has assistance devices when needed, to prevent accidents;

e. **failed** to make sure that residents with reduced range of motion get proper treatment and services to increase range of motion;

f. **failed** to properly care for residents needing special services;

g. **failed** to provide food in a way that meets a resident's needs; store cook, and give out food in a safe and clean way;

h. **failed** to make sure that residents who take drugs are not given too many doses or for too long or given inappropriate medications or overuse of medications;

i. **failed** to make sure that the use of drugs is carefully watched; or stop or change drugs that cause unwanted effects;

j. **failed** to keep the rate of medication errors (wrong drug, wrong dose, wrong time) to less than 5%; and

k. **failed** to provide needed housekeeping and maintenance;

or any plans of correction or follow-up surveys related to same.

Original Response: Defendant objects to Request No. 57 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 57 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant objects to Request No. 57 on the grounds that it seeks private medical information regarding other residents of Country Wood, which is protected from disclosure by HIPAA. Defendant further objects to Request No. 57 on the grounds that it seeks information regarding prior and subsequent events, which are neither relevant nor likely to lead to the discovery of evidence that would be admissible at trial. Evidence as to what may occurred between one party and a third party with reference to a thoroughly distinct incident is irrelevant. Information sought regarding prior and subsequent events that are totally unrelated to the subject matter of this lawsuit is not probative, but merely prejudicial. Furthermore, any such information is publicly available and is, therefore, equally available to Plaintiff.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant refers Plaintiff to the documents from these agencies that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and additional documents produced herewith.

Second Supplemental Response: Defendant renews its objection to Request No. 57 on the grounds that it seeks private medical information regarding other residents of Country Wood, which is protected from disclosure by HIPAA. In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of determining whether any additional responsive

documentation to this Request exists, and in the event responsive documentation is located, Defendant will seasonably produce same.

66.

Corporate tax returns for the years 2005-present.

Original Response: Defendant objects to this Request as overly broad, as it seeks information that is not narrowly tailored to the period of the time of events in question. Defendant further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant's corporate tax returns are only relevant to Plaintiff's claims for punitive damages, and, at this time, Plaintiff has not produced any affidavit, discovery responses, or other evidence sufficient to show that she has an evidentiary basis supporting her punitive damages claim.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

67.

Corporate financial statements for the years 2005-present. This includes, but is not limited to: income statements, balance sheets, statement of cash flow and audited financial statements.

Original Response: Defendant objects to this Request as overly broad, as it seeks information that is not narrowly tailored to the period of the time of events in question. Defendant further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant's financial information is only relevant to Plaintiff's claims for punitive damages, and, at this time,

Plaintiff has not produced any affidavit, discovery responses, or other evidence sufficient to show that she has an evidentiary basis supporting her punitive damages claim.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

68.

Documents which reflect the ownership and value of the property occupied by Country Wood Nursing Care Center.

Original Response: Defendant objects to this Request on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of evidence that will be admissible at trial. This Request is relevant only in the event that Plaintiff obtains a judgment against any of Defendants and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C. R. Civ. P. 69. Thus, this Request is premature and irrelevant to any of Plaintiff's claims in this action.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

69.

Documents which list and value the assets of Defendant Country Wood. Include in such documents any liens or mortgages placed on those assets and identify the holder and the amounts of any such lien.

Original Response: Defendant objects to this Request on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of

evidence that will be admissible at trial. This Request is relevant only in the event that Plaintiff obtains a judgment against any of Defendants and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C. R. Civ. P. 69. Thus, this Request is premature and irrelevant to any of Plaintiff's claims in this action.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

71.

All documents which define, delineate or explain in any way the relationship, duties and responsibilities between you and any co-defendant in this matter. This request includes, but is not limited to contracts, lease agreements, consulting agreements, letters, emails, facsimiles, texts, memoranda, notes, recordings, bills, etc.

Original Response: Defendant objects to Request No. 71 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 71 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith.

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant is not in possession of any documents responsive to this Request other than those previously produced. Defendant's corporate organizational documents are equally available to Plaintiff through a request to the South Carolina Secretary of State's office.

Second Supplemental Response: Defendant has produced all documents in its possession responsive to this Request. Defendant refers Plaintiff to its Second Supplemental Response to Request No. 10 for further information responsive to this Request.

STERLING HEALTHCARE

INTERROGATORIES

Pursuant to Judge Dickson's Discovery Order, Defendant Sterling Healthcare hereby supplements its Responses to Plaintiff's Interrogatories as follows:

3.

Identify each and every owner, member, officer of your corporation presently and at the time of Mildred Watkins' residency. State in detail any relationship, (blood, marriage, and/or contractual), you have with any other co-defendant, their officers, owners, members, agents and/or employees.

Original Response: Robert W. Hagan is the sole owner and managing member of Guardian Resources, LLC. Mr. Hagan was also the sole owner and president of Sterling Healthcare, Inc., before Sterling ceased doing business. Sterling and Guardian have no relationship. Sterling's relationship to Country Wood was contractual, the details of which are set forth in the Consulting Agreement produced herewith.

Supplemental Response: Defendant refers Plaintiff to its Original Response to Interrogatory 3, which Defendant states is the full and complete Response to same.

4.

Identify all insurance companies which provide any type of liability insurance coverage, including but not limited to first party liability policies, self-insured retention policies, liability policies covering individual employees, owners, members, shareholders or key individuals;

and/or policies of excess and/or umbrella coverage, and set forth the numbers of policies involved, the policy period dates, and the amounts of liability insurance coverage provided in these policies, including any deductibles.

Original Response: Defendant objects to this Interrogatory to the extent it calls for information that constitutes a legal conclusion. Defendant further objects on the ground that this Interrogatory seeks information regarding this Defendant's insurer's attitudes towards questions of coverage, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ballard v. Allegheny Airlines, Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving the foregoing objection, Defendant is not aware of any insurance policies in its name applicable to Plaintiff's claims.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above. Subject to and without waiving those objections, Defendant is in the process of obtaining Certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt.

Second Supplemental Response: Defendant is in the process of obtaining Certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt.

5.

If you contend that some other person or legal entity is, in whole or in part liable to you or the party asserting a claim against you in this matter and/or you contend that said person or entity should be made a party to this lawsuit, identify such person or entity, describe the basis of said liability, and identify the name and current address of each witness who can testify as to each fact you rely upon for said contention.

Original Response: Defendant objects to this Interrogatory to the extent it seeks the mental impressions, thought processes, and/or legal theories of counsel, which are privileged from production. Subject to and without waiving this objection, Defendant contends that any of Decedent's medical providers outside Country Wood could have caused the alleged injuries that are the subject of Plaintiff's claims, including but not limited to, Palmetto Health Richland, Capital City Ambulance, and Regional Ambulance Service. Defendant reserves the right to supplement this Response in accordance with the South Carolina Rules of Civil Procedure as discovery in this case proceeds.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above. Subject to and without waiving these objections, see Defendant Country Wood's Supplemental Response to Interrogatory No. 3, served simultaneously herewith.

Second Supplemental Response: Defendant refers Plaintiff to Defendant Country Wood's Supplemental Response to Interrogatory No. 3, above, for information responsive to this Request.

6.

Give the names and address of each person known to the parties or counsel to be a witness concerning the facts of the case and/or that you intend to call as a witness at the trial of this case. For each person known to the parties or counsel to be a witness, set forth a summary sufficient to inform the other party of the important facts known to be observed by such witness, indicate whether a statement has been taken from said party or witness, and provide a copy of any written or recorded statements taken.

Original Response: Defendant objects to Interrogatory No. 6 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 6 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and does not possess information responsive to Interrogatory No. 6.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above. Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident at Defendant Country Wood's facility and was not otherwise responsible for employment, staffing, or hiring decisions; therefore, it has no information responsive to this Interrogatory.

Second Supplemental Response: Defendant has no information responsive to this Interrogatory.

8.

Identify all photographs, plats, sketches, videotapes, audiotapes, pictures, nursing home records, nursing home bills, drawings, artist's renditions, x-rays, ultrasounds, diagrams, notes, measurements, statements, plats, laboratory slides, laboratory specimens, or laboratory "cuts", electronic data files, jpg files, data emails, web pages, brochures, information packets, contracts, agreements, or other documents or materials now or previously in possession, custody or control of the Defendant that relate to any claim or defense in the case and produce a copy of each.

Original Response: Defendant objects to Interrogatory No. 8 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 8 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and does not possess information responsive to Interrogatory No. 8.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above. Defendant further states that it did not provide medical or skilled nursing services to Decedent and was not otherwise responsible for employment, staffing, or hiring decisions at Defendant Country Wood's facility. Subject to and without waiving these objections, Defendant is in the process of locating payroll information for the individuals who provided care to Decedent during her residency and will supplement this Response upon receipt.

Second Supplemental Response: Defendant does not possess information responsive to Interrogatory No. 8.

9.

For each employee of the Defendant or person working on behalf of the Defendant at Country Wood nursing home who filled out any portion of, signed, or initialed the medical records of Mildred Watkins when she was a resident, identify the person, the official title or position, and whether the person was/is employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present

employment, if known. Furthermore, please identify each and every nurse, nurses' aide and/or CNA, who cared in any way for Mildred Watkins but whose name does not appear in the chart or medical records and state if that person was/is employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known.

Original Response: Defendant objects to Interrogatory No. 9 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and does not possess information responsive to Interrogatory No. 9. Furthermore, Defendant Sterling did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility.

Supplemental Response: Defendant has no information responsive to this Request.

12.

State the name, most current or last known address, social security number, professional license/registration number, title and dates employed for each individual who reported any accident, injury, or change in condition of Mildred Watkins to her family and/or physician as well as the date, time and method of this notification.

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility, and therefore has no information responsive to this Interrogatory.

First Supplemental Response: Defendant further states that it did not provide medical or skilled nursing services to Decedent and was not otherwise responsible for employment, staffing, or hiring at Defendant Country Wood's facility; therefore, it has no documents responsive to this Interrogatory.

Second Supplemental Response: Defendant has no information responsive to this Interrogatory.

14.

If you have, within the past ten (10) years, been involved in litigation or had a claim made against you or your representatives for any reason set forth for each: the claimant's or party's name and address; the attorney's name and address; the date of the underlying occurrence; the date you were notified of the same; the ultimate resolution; and a copy of each Summons and Complaint and Answer served if suit was filed.

Original Response: Defendant objects to Interrogatory No. 14 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 14 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Specifically, Interrogatory No. 14 does not specify the nature of the lawsuits about which it seeks information, and to the extent it seeks information regarding lawsuits similar to the instant one, such information constitutes prior or subsequent events, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, such information is equally available to Plaintiff by searching courts' publicly available records.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above and states again that the Interrogatory is overly broad because it is not narrowly tailored to the issues in this case. Plaintiff is not entitled to information on every lawsuit filed against Defendant (if any) of every nature. Defendant will consider supplementing this Response upon receipt of a narrowly tailored request from Plaintiff.

Second Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of identifying and collecting responsive documentation to this Request, but as the requested documentation is not tailored as to issues, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response as such documentation is located.

15.

State the date, nature, method and agency notified (Department of Health and Environmental Control Licensing and/or Certification Division, Long-Term Care Ombudsman, licensing board(s), etc.) of any Complaint containing allegations of resident abuse, neglect, injuries, or misappropriation of resident's property which the Defendant have reported or have knowledge of related to Country Wood since January 1, 2005.

Original Response: Defendant objects to Interrogatory No. 15 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 15 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and does not possess information responsive to Interrogatory No. 15.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above. Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident of Defendant Country Wood's facility and was not otherwise responsible for employment, staffing or hiring decisions at Defendant Country Wood's facility; therefore, it has no information responsive to this Interrogatory.

Second Supplemental Response: Defendant has no information responsive to this Interrogatory.

28.

For the period of Mildred Watkins' residency, identify each and every contract with individuals or entities other than a co-defendant which relates in any way to any management duties, consulting duties, administrative duties, patient care duties or any other operation of Country Wood nursing center where Mildred Watkins was a resident.

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility. Defendant did not provide medical or skilled nursing services to Decedent and was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant does not possess information responsive to Interrogatory No. 28.

Supplemental Response: Defendant has no information responsive to this Request.

42.

Please state whether or not you have a copy of any statement which the plaintiff or any representative of the Plaintiff has previously made concerning the action or its subject matter and which is in your possession, custody or control. For the purpose of this question, a statement

previously made is (1) a written statement signed or otherwise adopted or approved by the person making it, or (2) a stenographic, mechanical, electrical, or other recording, or a transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and does not possess information responsive to Interrogatory No. 42, but, to the extent such as statement exists, Defendant requests Plaintiff produce the same.

First Supplemental Response: Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident of Defendant Country Wood's facility and was not otherwise responsible for employment, staffing or hiring decisions at Defendant Country Wood's facility; therefore, it has no information responsive to this Interrogatory.

Second Supplemental Response: Defendant has no information responsive to this Interrogatory.

48.

State in detail the results of any police investigation, or other federal or state investigation related to the residency of Mildred Watkins and provide documents related thereto.

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility. Defendant does not possess information responsive to Interrogatory No. 48.

First Supplemental Response: Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident of Defendant Country Wood's

facility and was not otherwise responsible for employment, staffing or hiring decisions at Defendant Country Wood's facility; therefore, it has no information responsive to this Interrogatory.

Second Supplemental Response: Defendant has no information responsive to this Interrogatory.

49.

Detail your contention of how the Plaintiff sustained the injuries described in the Complaint which ultimately resulted in her death and state specifically and in detail what the claim or contention of the defendant will be regarding any cause or contributing cause of the injuries and ultimate death of the decedent, including a statement in detail of the facts or information upon which this contention is based.

Original Response: Defendant objects to Interrogatory No.49 to the extent that it calls for an expert medical opinion. Defendant objects to Interrogatory No. 49 on the grounds it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objection, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility. Defendant did not provide medical or skilled nursing services to Decedent and was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant specifically reserves the right to rely upon facts and evidence discovered up to and including the trial of this case and will supplement its Response to Interrogatory No. 49 in accordance with the South Carolina Rules of Civil Procedure.

Supplemental Response: Defendant has no additional discoverable information to disclose at this time. As Discovery is ongoing, Defendant will supplement this Response in accordance with the South Carolina Rules of Civil Procedure if and when any discoverable information is obtained by Defendant.

Supp. 1

Provide the email address of all administrators, employees, and staff working at Guardian during the period of Plaintiff's residency. This request does not seek personal email addresses, only email addresses which are in any way affiliated with Country Wood, Sterling and/or Guardian and employment therewith.

Original Response: Defendant objects to this Interrogatory on the ground that it exceeds the maximum number of interrogatories allowed under the South Carolina Rules of Civil Procedure. See S.C. R. Civ. P. 33(b)(9). Specifically, Plaintiff has already served this Defendant with 53 interrogatories in her initial discovery requests, and this Interrogatory constitutes her 54th interrogatory to this Defendant, not including subparts. Further, Plaintiff has not shown good cause and received the Court's permission to serve more than 50 interrogatories. Defendant further objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

REQUESTS FOR PRODUCTION

Pursuant to the Discovery Order of Judge Dickson, Defendant Sterling Healthcare hereby supplements its Responses to Plaintiff's Requests for Production as follows:

2.

Copies of any and all statements given by the Plaintiffs, Plaintiffs' family, and/or Defendant which are in possession of the Defendant or Defendant's attorney, whether written or recorded on a tape recorder or otherwise.

Original Response: Defendant objects to Request No. 2 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R. Civ. P. 26(b)(3). Subject to and without waiving the foregoing objection, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 2.

First Supplemental Response: Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident of Defendant Country Wood's facility and was not otherwise responsible for employment, staffing or hiring decisions at Defendant Country Wood's facility; therefore, it has no information responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

3.

Copies of any and all statements given by either eye witnesses or other witnesses to the incidents and matters complained of herein which are in the possession of the Defendant or Defendant's attorney, whether written or recorded or on a tape recorder or otherwise.

Original Response: Defendant objects to Request No. 3 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R.

Civ. P. 26(b)(3). Subject to and without waiving the foregoing objection, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 3.

First Supplemental Response: Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident of Defendant Country Wood's facility and was not otherwise responsible for employment, staffing or hiring decisions at Defendant Country Wood's facility; therefore, it has no information responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

5.

Copies of any and all statements, memoranda, reports or other materials which in any other way might relate to the incident which are the subject of this litigation which are in the possession of the Defendant or Defendant's attorney, whether written or recorded or on a tape recorder or otherwise.

Original Response: Defendant objects to Request No. 5 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 5 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R. Civ. P. 26(b)(3). Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 3.

First Supplemental Response: Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident of Defendant Country Wood's facility and was not otherwise responsible for employment, staffing or hiring decisions at Defendant Country Wood's facility; therefore, it has no information responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

6.

Copies of any and all photographs, videos, plats or diagrams which the Defendant or Defendant's attorney may have which relate to the matters alleged herein, including, but not limited to, the photographs, videos, plats or diagrams, to include negatives of such photographs.

Original Response: Defendant objects to Request No. 6 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 6 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R. Civ. P. 26(b)(3). Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 6.

First Supplemental Response: Defendant further states that it did not provide medical or skilled nursing services to Decedent or any other resident of Defendant Country Wood's facility and was not otherwise responsible for employment, staffing or hiring decisions at Defendant Country Wood's facility; therefore, it has no information responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

7.

Copy of the complete text, including all endorsements thereof, of any insurance policy which may be applicable to the Plaintiffs' claim.

Original Response: Defendant objects to this Request to the extent it calls for a legal conclusion. Defendant further objects on the ground that it seeks information regarding this Defendant's insurer's attitudes towards questions of coverage which is neither relevant nor likely to lead to the discovery of admissible evidence. See Ballard v. Allegheny Airlines, Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving these objections, Defendant is not aware of any insurance policies in its name that may be applicable to Plaintiff's claims.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of obtaining Certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt.

Second Supplemental Response: Defendant is in the process of obtaining Certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt.

11.

Any and all statements of possible witnesses, whether written, recorded, summarized or otherwise preserved in any manner concerning the facts or issues in this action.

Original Response: . Defendant objects to Request No. 11 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product,

attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R. Civ. P. 26(b)(3). Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 11.

First Supplemental Response: Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

12.

All medical articles, treatises, and/or any other medical literature you claim support the diagnosis, treatment, or care provided to Mildred Watkins.

Original Response: Defendant objects to Request No. 12 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 12 to the extent that it calls for an expert medical opinion. Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility. Furthermore, Defendant Sterling did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant does not possess documents responsive to Request No. 12.

First Supplemental Response: Defendant renews its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

16.

All documents showing that Defendant and/or any co-defendant informed Mildred Watkins' physician of any significant changes in her status (42 CFR § 483.10(b)(11)).

Original Response: Defendant objects to Request No. 16 to the extent in requests information or documents in the possession of individuals or entities other than this Defendant. Plaintiff cannot require this Defendant to provide information or documents in the possession of others. Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 16.

First Supplemental Response: Defendant renews its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

17.

All written or electronic documents, including but not limited to salary information, contracts, and personnel files between the Defendant and any employee, agent, owner, and/or member of Country Wood.

Original Response: Defendant objects to Request No. 17 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 17 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 17 on the grounds it requests confidential information contained in personnel files, which is not automatically discoverable. Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility. Furthermore, Defendant Sterling did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant did not employ any individuals working at Defendant Country Wood's facility.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant does not have any responsive documents.

Second Supplemental Response: Defendant has no information responsive to this Request.

18.

All written or electronic documents, including but not limited to salary information, contracts, and personnel files between the Defendant and any employee, agent, owner, and/or member of Defendant Sterling.

Original Response: See Defendant's Objections and Response to Request for Production No. 17.

First Supplemental Response: See Defendant's Supplemental Response to Request for Production No. 17.

Second Supplemental Response: See Defendant's Supplemental Response to Request for Production No. 17.

19.

A copy of the medical director or co-medical director(s) contract and credentialing file for the period of Mildred Watkins' residency.

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 19.

First Supplemental Response: Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

21.

Any and all documents including incident reports, occurrence reports, investigation reports, quality assurance reports, documents, studies, complaints or incident investigation documents, which in any way refer to or concern Mildred Watkins. This would include and not be limited to any and all documents required to be prepared and maintained by the South Carolina Department of Health and Environmental Control, Regulation 61-17, Standards for Licensing Nursing Homes, § 7, et seq., "Reports and Records" as well as any and all internal documents or reports.

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 24.

First Supplemental Response: Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

24.

All documents showing the net earnings, gross earnings, expenses, balance sheets, budgets and all other financial information regarding the Defendant from January 1, 2005 - present, including but not limited to all documents of any budget planning and revision which were developed and/or implemented from January 1, 2005 present. This request specifically includes, but is not limited to, any and all meeting minutes or notes, proposed budgets, amended and/or revised budgets, and other item(s) which describe how the final approved budget was

developed and implemented. Produce any documents pertaining to outside companies, entities, or individuals who have any control or input on budgets and financial decisions and identify said companies and/or individuals.

Response: Defendant objects to Request No. 24 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 24 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Records relating to Defendant's financial condition are only relevant to Plaintiff's claim for punitive damages, which is based solely upon the rendering of medical and/or skilled nursing services at Country Wood. Defendant did not and does not provide such services to any resident of Country Wood, including Decedent.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant states that it is currently in the process of determining whether it may possess any responsive documentation to this Request, and Defendant will seasonably supplement this Response in the event such documentation is identified.

25.

All document showing payment of any kind made by and/or to this defendant by and/or to any co-defendant from 2005 to the present and all documents identifying the basis for such payment, including but not limited to invoices, receipts, bills, contracts, agreements, etc.

Original Response: Defendant objects to Request No. 25 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 25 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible

evidence at trial. Records relating to Defendant's financial condition are only relevant to Plaintiff's claim for punitive damages, which is based solely upon the rendering of medical and/or skilled nursing services at Country Wood. Defendant did not and does not provide such services to any resident of Country Wood, including Decedent. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to its Consulting Defendant Country Wood produced herewith. Defendant and undersigned counsel will consider supplementing this Response upon clarification and receipt of additional information from Plaintiff.

First Supplemental Response: Defendant renews its each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of determining if any responsive documents exist and will supplement this Response with any responsive documents upon receipt.

Second Supplemental Response: Defendant does not possess any documents responsive to this Request.

26.

Any and all incident/accident reports, unusual occurrence reports, or variance reports made to any federal, state or local government agency and/or any licensing authority or board pertaining to Mildred Watkins made in compliance with 42 CFR § 483.13(c)(4) or with the South Carolina Department of Health and Environmental Control, Regulation 61-178, Standards for Licensing Nursing Homes, Section B(7).

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 26.

First Supplemental Response: Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

34.

All documents showing the actual number of hours of available nursing personnel time (for each shift) or the actual number (quantity) of certified nursing assistants, nurse assistants, orderlies, medication aides, and nurses on duty at Country Wood from January 1, 2005 - present.

Original Response: Defendant objects to Request No. 34 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility. Furthermore, Defendant Sterling did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant did not employ any individuals working at Defendant Country Wood's facility. Defendant does not possess documents responsive to Request No. 34.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant does not have any documents responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

35.

Copies of any and all documents regarding nursing hours per resident per day during Mildred Watkins' residency.

Original Response: Defendant objects to Request No. 35 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility. Furthermore, Defendant Sterling did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant did not employ any individuals working at Defendant Country Wood's facility. Defendant does not possess documents responsive to Request No. 35.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant does not have any documents responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

38.

Copies of any and all documentation indicating how much the Defendant billed for the care of Mildred Watkins, the amount of money paid to treat Mildred Watkins, and by whom payment was made.

Original Response: Defendant objects to Request No. 38 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 38on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 38.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant does not have any documents responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

41.

All reports made by officers, agents and/or employees of the Defendant in regard to the acts, omission or occurrences described in Plaintiff's Complaint.

Original Response: Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 41.

First Supplemental Response: Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

43.

A complete copy of promotional materials used by Sterling including, but not limited to, brochures, rate schedules, services available, and responsibilities, etc., in existence between January 1, 2005 and December 31, 2011.

Original Response: Defendant objects to Request No. 43 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 43 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving the foregoing objections, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and does not possess relevant documents responsive to Request No. 43. The financial services Defendant provided to Defendant Country Wood prior to Decedent's admission to the facility are irrelevant to her medical care and/or any allegation or issue in this case.

First Supplemental Response: Defendant further states that it is not in possession of any responsive documents because it did not provide medical or skilled nursing services to Decedent and was not responsible for employment, staffing, or hiring at Defendant Country Wood's facility. Additionally, Defendant does not have any written promotional or other similar materials regarding the services it previously provided to Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

44.

A copy of any and all depositions given by any officer, agent, and/or employee of the Defendant for the last 10 years in the possession or control of the Defendant, Defendant's counsel, or Defendant's agents and/or employees. If depositions have been given by these individuals which are not currently in the possession or control of the Defendant or Defendant's counsel for this case, provide the identity of attorney or other individual or entity who would have possession or control of the same.

Original Response: Defendant objects to Request No. 44 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 44 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 44 to the extent it seeks information regarding "prior bad acts," which is neither relevant nor reasonably calculated to lead to the discovery of evidence that would be admissible at trial. S.C. R. Evid. 404(b).

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant further clarifies that this Request is overly broad because it does not limit the scope of the topics for which she has requested deposition testimony. Defendant will consider supplementing upon receipt of a narrowly tailored Request from Plaintiff.

Second Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of identifying and collecting responsive documentation to this Request, but as the request for such documentation is not tailored as to topic, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response as such documentation is located.

67.

Corporate tax returns for the years 2005-present.

Response: Defendant objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant's corporate tax returns are only relevant to Plaintiff's claims for punitive damages, which are based on the rendering of medical and skilled nursing services at Country Wood, and this Defendant has produced documents demonstrating that it does or did provide such services to any resident of Defendant Country Wood's facility, including Decedent. Defendant further objects to this Request as overbroad, as it seeks information that is not narrowly tailored to the period of the time of events in question.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

68.

Corporate financial statements for the years 2005-present. This includes, but is not limited to: income statements, balance sheets, statement of cash flow and audited financial statements.

Response: Defendant objects to Request No. 68 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 68 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Records relating to Defendant's financial condition are only relevant to Plaintiff's claim for punitive damages, which is based solely upon the rendering of medical

and/or skilled nursing services at Country Wood. Defendant does not provide such services to residents of Country Wood.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

69.

Documents which reflect the ownership and value of the property occupied by Country Wood Nursing Care Center.

Response: Defendant objects to Request No. 69 on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Request No. 69 is relevant only in the event that Plaintiff obtains a judgment against Defendant and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C. R. Civ. P. 69. Request No. 69 is, therefore, premature, irrelevant and improper.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

70.

Documents which list and value the assets of Defendant Sterling. Include in such documents any liens or mortgages placed on those assets and identify the holder and the amounts of any such lien.

Response: Defendant objects to Request No. 70 on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible

evidence. Request No. 70 is relevant only in the event that Plaintiff obtains a judgment against Defendant and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C. R. Civ. P. 70. Request No. 70 is, therefore, premature, irrelevant and improper.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

71.

All documents between you and any co-defendant relating in any way to Mildred Watkins. This request includes, but is not limited to: letters, facsimiles, emails, texts, memoranda, notes, recordings, bills, records, etc.

Original Response: Defendant objects to Request No. 71 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R. Civ. P. 26(b)(3). Subject to and without waiving the foregoing objection, Defendant Sterling ceased doing business prior to Decedent's residency at Defendant Country Wood's facility and, therefore, does not possess documents responsive to Request No. 71.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant further states that it did not provide medical or skilled nursing services to Defendant or any other resident of Defendant Country Wood's facility and was not responsible for employment, hiring, or staffing decisions at Defendant Country Wood's facility and therefore has no documents responsive to this Request.

Second Supplemental Response: Defendant has no information responsive to this Request.

72.

All documents which define, delineate or explain in any way the relationship, duties and responsibilities between you and any co-defendant in this matter. This request includes, but is not limited to contracts, lease agreements, consulting agreements, letters, emails, facsimiles, texts, memoranda, notes, recordings, bills, etc.

Original Response: Defendant refers Plaintiff to documents produced herewith.

First Supplemental Response: Defendant further refers Plaintiff to Defendant Sterling's Articles of Organization, produced herewith. Defendant further states that it is in the process of determining whether any additional responsive documents exist and will supplement this Response with any such documents upon receipt.

Second Supplemental Response: To Defendant's knowledge, all responsive documents in Defendant's possession have been previously produced. In the event Defendant locates additional information responsive to this Request, Defendant will seasonably supplement this Response.

GUARDIAN RESOURCES

INTERROGATORIES

Pursuant to Judge Dickson's Discovery Order, Defendant Guardian supplements its Responses to Plaintiff's separately numbered Interrogatories as follows:

4.

Identify all insurance companies which provide any type of liability insurance coverage, including but not limited to first party liability policies, self-insured retention policies, liability

policies covering individual employees, owners, members, shareholders or key individuals; and/or policies of excess and/or umbrella coverage, and set forth the numbers of policies involved, the policy period dates, and the amounts of liability insurance coverage provided in these policies, including any deductibles.

Original Response: Defendant objects to this Interrogatory to the extent it calls for information that constitutes a legal conclusion. Defendant further objects on the ground that this Interrogatory seeks information regarding this Defendant's insurer's attitudes towards questions of coverage, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ballard v. Allegheny Airlines, Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving the foregoing objection, Defendant is not aware of any insurance policies in its name applicable to Plaintiff's claims.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of obtaining the Certificates of Insurance for any policies in place during Decedent's residency at Defendant Country Wood's facility and will supplement this Response upon receipt.

Second Supplemental Response: Defendant is in the process of obtaining Certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt.

5.

If you contend that some other person or legal entity is, in whole or in part liable to you or the party asserting a claim against you in this matter and/or you contend that said person or entity should be made a party to this lawsuit, identify such person or entity, describe the basis of

said liability, and identify the name and current address of each witness who can testify as to each fact you rely upon for said contention.

Original Response: Defendant objects to this Interrogatory to the extent it seeks the mental impressions, thought processes, and/or legal theories of counsel, which are privileged from production. Subject to and without waiving this objection, Defendant contends that any of Decedent's medical providers outside Country Wood could have caused the alleged injuries that are the subject of Plaintiff's claims, including but not limited to, Palmetto Health Richland, Capital City Ambulance, and Regional Ambulance Service. Defendant reserves the right to supplement this Response in accordance with the South Carolina Rules of Civil Procedure as discovery in this case proceeds.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above. Subject to and without waiving these objections, see Defendant Country Wood's Supplemental Response to Interrogatory No. 3, served simultaneously herewith.

Second Supplemental Response: Defendant refers Plaintiff to Defendant Country Wood's Supplemental Response to Interrogatory No. 3, above.

8.

Identify all photographs, plats, sketches, videotapes, audiotapes, pictures, nursing home records, nursing home bills, drawings, artist's renditions, x-rays, ultrasounds, diagrams, notes, measurements, statements, plats, laboratory slides, laboratory specimens, or laboratory "cuts", electronic data files, jpg files, data emails, web pages, brochures, information packets, contracts, agreements, or other documents or materials now or previously in possession, custody or control of the Defendant that relate to any claim or defense in the case and produce a copy of each.

Original Response: Defendant objects to Interrogatory No. 8 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 8 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant does not possess information responsive to Interrogatory No. 8.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of locating payroll information for the individuals who rendered care to Decedent during her residency at Defendant Country Wood's facility and will supplement this Response upon receipt.

Second Supplemental Response: Defendant does not possess information responsive to Interrogatory No. 8.

14.

If you have, within the past ten (10) years, been involved in litigation or had a claim made against you or your representatives for any reason set forth for each: the claimant's or party's name and address; the attorney's name and address; the date of the underlying occurrence; the date you were notified of the same; the ultimate resolution; and a copy of each Summons and Complaint and Answer served if suit was filed.

Original Response: Defendant objects to Interrogatory No. 14 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 14 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Specifically, Interrogatory No. 14 does not specify the nature of the lawsuits about which it seeks information, and to the extent it seeks information regarding lawsuits similar to the instant one, such information constitutes prior or subsequent events, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, such information is equally available to Plaintiff by searching courts' publicly available records.

First Supplemental Response: Defendant renews each of its objections to this Interrogatory as set forth in its Original Response above and states again that the Interrogatory is overly broad because it is not narrowly tailored to the issues in this case. Plaintiff is not entitled to information on every lawsuit filed against Defendant (if any) of every nature. Defendant will consider supplementing this Response upon receipt of a narrowly tailored request from Plaintiff.

Second Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of determining whether any additional responsive documentation to this Request exists, but as such documentation is not tailored to similar incidents, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response in the event responsive documentation is located.

15.

State the date, nature, method and agency notified (Department of Health and Environmental Control Licensing and/or Certification Division, Long-Term Care Ombudsman, licensing board(s), etc.) of any Complaint containing allegations of resident abuse, neglect, injuries, or misappropriation of resident's property which the Defendant have reported or have knowledge of related to Country Wood since January 1, 2005.

Original Response: Defendant objects to Interrogatory No. 15 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 15 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving the foregoing objections, Defendant does not possess information responsive to Interrogatory No. 15.

Supplemental Response: Defendant does not possess information responsive to Interrogatory No. 15.

40.

State in detail any alteration made to Mildred Watkins' bed at any time during her residency. If the bed was altered in any way, state the alteration made, the reason the alteration was made, by whom it was made and the date of such alteration. Further, identify the number of other beds in the Country Wood facility which were altered in the same manner and the dates of such alteration.

Original Response: Defendant did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. No employee of Defendant Guardian worked for or at

Defendant Country Wood's facility. Defendant does not possess information responsive to Interrogatory No. 40.

First Supplemental Response: In addition to the information requested in Interrogatory No. 40 above, Plaintiff has also asked for (via letter from counsel dated March 25, 2015), with respect to Guardian's duties related to acquisition of supplies, whether any items were purchased related to beds or the alteration of beds during the period of Decedent's residency. Defendant objects to this request, as it is a completely separate Interrogatory, and Plaintiff has already exceeded the number of interrogatories allowed under the South Carolina Rules of Civil Procedure. S.C. R. Civ. P. 33(b)(9).

Second Supplemental Response: Defendant does not possess any information responsive to this Interrogatory as originally drafted by Plaintiff and propounded on Defendant.

Supp. 1

Provide the email address of all administrators, employees, and staff working at Guardian during the period of Plaintiff's residency. This request does not seek personal email addresses, only email addresses which are in any way affiliated with Country Wood, Sterling and/or Guardian and employment therewith.

Original Response: Defendant objects to this Interrogatory on the ground that it exceeds the maximum number of interrogatories allowed under the South Carolina Rules of Civil Procedure. See S.C. R. Civ. P. 33(b)(9). Specifically, Plaintiff has already served this Defendant with 53 interrogatories in her initial discovery requests, and this Interrogatory constitutes her 54th interrogatory to this Defendant, not including subparts. Further, Plaintiff has not shown good cause and received the Court's permission to serve more than 50 interrogatories. Defendant

further objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

REQUESTS FOR PRODUCTION

Pursuant to Judge Dickson's Discovery Order, Defendant Guardian supplements its Responses to Plaintiff's Requests for Production as follows:

5.

Copies of any and all statements, memoranda, reports or other materials which in any other way might relate to the incident which are the subject of this litigation which are in the possession of the Defendant or Defendant's attorney, whether written or recorded or on a tape recorder or otherwise.

Original Response: Defendant objects to Request No. 5 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 5 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R. Civ. P. 26(b)(3). Subject to and without waiving the foregoing objections, Defendant does not possess documents responsive to Request No. 5.

Supplemental Response: Defendant does not possess documents responsive to Request No. 5.

6.

Copies of any and all photographs, videos, plats or diagrams which the Defendant or Defendant's attorney may have which relate to the matters alleged herein, including, but not limited to, the photographs, videos, plats or diagrams, to include negatives of such photographs.

Original Response Defendant objects to Request No. 6 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 6 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. S.C. R. Civ. P. 26(b)(3). Subject to and without waiving the foregoing objections, Defendant does not possess documents responsive to Request No. 6.

Supplemental Response: Defendant does not possess documents responsive to Request No. 6.

17.

All written or electronic documents, including but not limited to salary information, contracts, and personnel files between the Defendant and any employee, agent, owner, and or member of Country Wood.

Original Response: Defendant objects to Request No. 17 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 17 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 17 on the grounds it requests confidential information contained in personnel files, which is not automatically discoverable. Subject to and without waiving the foregoing objections, Defendant did not provide medical or

skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant does not possess documents responsive to Request No. 17.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of locating payroll information for the individuals who rendered care to Decedent during her residency at Defendant Country Wood's facility and will supplement this Response upon receipt.

Second Supplemental Response: Defendant does not possess any documents responsive to Request No. 17.

18.

All written or electronic documents, including but not limited to salary information, contracts, and personnel files between the Defendant and any employee, agent, owner, and/or member of Defendant Guardian.

Original Response: See Defendant's Response to Request for Production No. 17.

First Supplemental Response: See Defendant's Supplemental Response to Request for Production No. 17.

Second Supplemental Response: See Defendant's Supplemental Response to Request for Production No. 17.

24.

All documents showing the net earnings, gross earnings, expenses, balance sheets, budgets and all other financial information regarding the Defendant from January 1, 2005 – present, including but not limited to all documents of any budget planning and revision which

were developed and/or implemented from January 1, 2005 – present. This request specifically includes, but is not limited to, any and all meeting minutes or notes, proposed budgets, amended and/or revised budgets, and other items) which describe how the final approved budget was developed and implemented. Produce any documents pertaining to outside companies, entities, or individuals who have any control or input on budgets and financial decisions and identify said companies and/or individuals.

Original Response: Defendant objects to Request No. 24 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 24 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Records relating to Defendant's financial condition are only relevant to Plaintiff's claim for punitive damages, which is based solely upon the rendering of medical and/or skilled nursing services at Country Wood. Defendant does not provide such services to residents of Country Wood.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant states that it is currently in the process of determining whether it may possess any responsive documentation to this Request, and Defendant will seasonably supplement this Response in the event such documentation is identified.

25.

All document showing payment of any kind made by and/or to this defendant by and/or to any co-defendant from 2005 to the present and all documents identifying the basis for such payment, including but not limited to invoices, receipts, bills, contracts, agreements, etc.

Original Response: Defendant objects to Request No. 25 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 25 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Records relating to Defendant's financial condition are only relevant to Plaintiff's claim for punitive damages, which is based solely upon the rendering of medical and/or skilled nursing services at Country Wood. Defendant does not provide such services to any resident of Country Wood. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to its Consulting Defendant Country Wood produced herewith. Defendant and undersigned counsel will consider supplementing this Response upon clarification and receipt of additional information from Plaintiff.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of determining whether any responsive documents exist and will supplement this Response with any such documents upon receipt.

Second Supplemental Response: In light of Judge Dickson's recent Discovery Order, Defendant is working to determine whether any responsive documents exist and will supplement this Response with any such documents upon receipt.

34.

All documents showing the actual number of hours of available nursing personnel time (for each shift) or the actual number (quantity) of certified nursing assistants, nurse assistants, orderlies, medication aides, and nurses on duty at Country Wood from January 1, 2005 – present.

Original Response: Defendant objects to Request No. 34 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility. Defendant did not employ any individuals working at Defendant Country Wood's facility. Defendant does not possess documents responsive to Request No. 34.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of locating payroll information for the individuals who rendered care to Decedent during her residency at Defendant Country Wood's facility and will supplement this Response upon receipt.

Second Supplemental Response: Defendant refers Plaintiff to Co-Defendant Country Wood's Response to Plaintiff's Interrogatory No. 15 for information responsive to this Request.

35.

Copies of any and all documents regarding nursing hours per resident per day during Mildred Watkins' residency.

Original Response: Defendant objects to Request No. 35 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment, hiring, and staffing at Defendant Country Wood's facility.

Defendant did not employ any individuals working at Defendant Country Wood's facility. Defendant does not possess documents responsive to Request No. 35.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of locating payroll information for the individuals who rendered care to Decedent during her residency at Defendant Country Wood's facility and will supplement this Response upon receipt.

Second Supplemental Response: Defendant refers Plaintiff to Co-Defendant Country Wood's Response to Plaintiff's Interrogatory No. 15 for information responsive to this Request.

37.

The full and complete personnel files of any and all other employees who cared for Mildred Watkins, as well as any and all documents of any type related to any reprimands or counseling or termination of those employees. The Plaintiff does not seek information related to employee's dependents and such information may be redacted.

Original Response: Defendant objects to Request No. 37 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to this Request as it seeks the production of private and confidential material. Defendant further objects to the extent that the Request seeks information regarding the discipline of employees of Country Wood to the extent that such actions may be considered subsequent remedial measures, which are neither relevant, nor reasonably calculated to lead to the discovery of admissible evidence. S.C. R. Civ. P. 407. Subject to and without waiving the foregoing objections, Defendant did not provide medical or skilled nursing services to Decedent and otherwise was not responsible for the employment,

hiring, training and staffing at Defendant Country Wood's facility. Defendant did not employ any individuals working at Defendant Country Wood's facility. Defendant does not possess documents responsive to Request No. 37.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above and re-iterates that it has no such documents in its possession because it is not responsible for the employment, staffing, or hiring at Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request.

43.

A complete copy of promotional materials used by Guardian including, but not limited to, brochures, rate schedules, services available, and responsibilities, etc., in existence between January 1, 2005 and December 31, 2011.

Original Response: Defendant objects to Request No. 43 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 43 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving the foregoing objections, Defendant does not possess relevant documents responsive to Request No. 42. The financial services Defendant provided to Defendant Country Wood are irrelevant to her medical care and/or any allegation or issue in this case.

First Supplemental Response: Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections,

Defendant does not have any such materials as they relate to the services provided to Defendant Country Wood's facility.

Second Supplemental Response: Defendant has no information responsive to this Request as relates to Defendant Country Wood's facility.

44.

A copy of any and all depositions given by any officer, agent, and/or employee of the Defendant for the last 10 years in the possession or control of the Defendant, Defendant's counsel, or Defendant's agents and/or employees. If depositions have been given by these individuals which are not currently in the possession or control of the Defendant or Defendant's counsel for this case, provide the identity of attorney or other individual or entity who would have possession or control of the same.

Original Response: Defendant objects to Request No. 44 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 44 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 44 to the extent it seeks information regarding "prior bad acts," which is neither relevant nor reasonably calculated to lead to the discovery of evidence that would be admissible at trial. S.C. R. Evid. 404(b).

First Supplemental Response: Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant further clarifies that this Request is overly broad because it does not limit the scope of the topics for which she has requested deposition testimony. Defendant will consider supplementing upon receipt of a narrowly tailored Request from Plaintiff.

Second Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of identifying and collecting responsive documentation to this Request, but as the requested documentation is not tailored as to topic, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response as such documentation is located.

67.

Corporate tax returns for the years 2005-present.

Original Response: Defendant objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant's corporate tax returns are only relevant to Plaintiff's claims for punitive damages, which are based on the rendering of medical and skilled nursing services at Country Wood, and this Defendant has produced documents demonstrating that it does or did provide such services to any resident of Defendant Country Wood's facility, including Decedent. Defendant further objects to this Request as overbroad, as it seeks information that is not narrowly tailored to the period of the time of events in question.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

68.

Corporate financial statements for the years 2005-present. This includes, but is not limited to: income statements, balance sheets, statement of cash flow and audited financial statements.

Original Response: Defendant objects to Request No. 68 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 68 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Records relating to Defendant's financial condition are only relevant to Plaintiff's claim for punitive damages, which is based solely upon the rendering of medical and/or skilled nursing services at Country Wood. Defendant does not provide such services to residents of Country Wood.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

69.

Documents which reflect the ownership and value of the property occupied by Country Wood Nursing Care Center.

Original Response: Defendant objects to Request No. 69 on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Request No. 69 is relevant only in the event that Plaintiff obtains a judgment against Defendant and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C. R. Civ. P. 69. Request No. 69 is, therefore, premature, irrelevant and improper.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

70.

Documents which list and value the assets of Defendant Guardian. Include in such documents any liens or mortgages placed on those assets and identify the holder and the amounts of any such lien.

Original Response: Defendant objects to Request No. 70on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Request No. 70 is relevant only in the event that Plaintiff obtains a judgment against Defendant and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C. R. Civ. P. 69. Request No. 70 is, therefore, premature, irrelevant and improper.

Supplemental Response: In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to same as soon as such information is located.

72.

All documents which define, delineate or explain in any way the relationship, duties and responsibilities between you and any co-defendant in this matter. This request includes, but is not limited to contracts, lease agreements, consulting agreements, letters, emails, facsimiles, texts, memoranda, notes, recordings, bills, etc.

Original Response: Defendant refers Plaintiff to documents produced herewith.

First Supplemental Response: Defendant further refers Plaintiff to Defendant Guardian's organizational documents, produced herewith. Defendant further states that it is in the process of determining whether any additional responsive documents exist and will supplement this Response with any such documents upon receipt.

Second Supplemental Response: Defendant has produced all responsive documentation of which it is currently aware. In the event additional responsive documentation is discovered, Defendant will seasonably supplement this Response.

This 13th day of January, 2017.

LEWIS BRISBOIS BISGAARD & SMITH LLP

BRANTLEY C. ROWLEN
Admitted *Pro Hac Vice*
LEAH F. PARKER
South Carolina Bar No. 101200

Attorney for Defendants

1180 Peachtree Street, N.E.
Suite 2900
Atlanta, Georgia 30309
Telephone: 404-348-8585
Facsimile: 404-467-8845
Brantley.Rowlen@lewisbrisbois.com
Leah.Parker@lewisbrisbois.com

CERTIFICATE OF SERVICE

I hereby certify that I have deposited a true and correct copy of the foregoing *Defendants' Supplemental Responses to Plaintiff's Interrogatories and Requests for Production Pursuant to the Order of Judge Dickson*, and all documents referenced therein, in the United States Mail, proper postage prepaid, addressed to all counsel of record, as follows:

Jennifer Randolph Purdy
Popowski, Callas & Shirley, P.A.
1430 Blanding Street
P. O. Box 7397
Columbia, South Carolina 29202

Counsel for Plaintiff

This 13th day of January, 2017.

LEWIS BRISBOIS BISGAARD & SMITH LLP

LEAH F. PARKER
S.C. Bar No. 101200

Attorney for Defendants

1180 Peachtree Street, N.E.
Suite 2900
Atlanta, Georgia 30309
Telephone: 404-348-8585
Facsimile: 404-467-8845
Leah.Parker@lewisbrisbois.com

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND JEAN WATKINS, as Personal Representative of the Estate of Mildred Watkins, Plaintiff, vs. STERLING HEALTHCARE, INC., COUNTRY WOOD NURSING CENTER, LLC, and GUARDIAN RESOURCES, LLC, Defendants.	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT Case No.: 2016-CP-40-04463 **AFFIDAVIT OF JENNIFER PURDY, ESQ.**

RICHLAND COUNTY FILED
2017 JAN 23 PM 4:51
JEANNETTE W. McBRIDE C.C.P. & G.S.

The Affiant, being duly sworn, states as follows:

1. My name is Jennifer Randolph Purdy and I am the attorney for the Plaintiff in the above-entitled action.

2. Service of Plaintiff's First Set of Interrogatories and First Set of Requests for Production to all Defendants was accepted by Brantley Rowlen, Esquire, counsel for the Defendants, on September 5, 2014.

3. Thereafter, partial discovery responses were received from the defendants over the course of several months, but complete responses to Plaintiff's discovery requests were never received.

4. When attempts to resolve the discovery dispute with opposing counsel were unsuccessful, I filed a Notice of Motion and Motion to Compel against all Defendants on July 29, 2015.

5. On February 24, 2016, Plaintiff's Motion to Compel was heard by Judge Edgar Dickson. Later in the afternoon, counsel for both parties received an email from Emily Burgis, the law clerk assisting Judge Dickson at the hearing, advising that Judge Dickson had granted Plaintiff's Motion to Compel and requesting that both parties submit proposed Orders.

6. On November 30, 2016, John Dodds, law clerk to Judge Dickson, emailed counsel for both parties and advised that Judge Dickson had signed the Plaintiff's version of the Order Granting Plaintiff's Motion to Compel Against All Defendants. (See Exhibit D)

7. The Order Granting Plaintiff's Motion to Compel Against All Defendants directed Defendants to produce the information specified within twenty (20) days of the date of Order.

8. The time period specified in the Order expired on December 20, 2016.

9. No information was produced by the Defendants by December 20, 2016.

10. On December 29, 2016 I sent a letter to counsel for Defendants asking for production of all documents and information specified in the Order no later than January 6, 2017. (See Exhibit E.)

11. On January 3, 2017, I received an email from Brantley Rowlen, Esq., counsel for Defendants, advising that they "inadvertently did not calendar the date" but were gathering the information. (See Exhibit F.)

12. Subsequently, on January 5, 2017, Leah Parker, Esq., counsel for Defendants contacted me by email, again referenced the "inadvertent calendaring" and stated that due to the holidays and an illness, she had been unable to communicate with her client about the discovery until that week. She requested an extension of one additional week to produce the information specified in the Order. (See Exhibit G.)

13. In my responsive email of January 5, 2017, (See Exhibit H), I addressed the amount of time that defense counsel had been aware of Judge Dickson's ruling, as well as the amount of time that defense counsel was aware of the signed Order. I agreed to extend the deadline to January 13, 2017 if I ***received*** full and complete production of documents and information by that date. In my email, I further noted that I would have to seek in the involvement of the Court if I did not receive full and complete production by that date.

14. As of January 13, 2017, I had received no information from the Defendants.

15. On January 19, 2017, I received Defendants' Supplemental Responses to Plaintiff's Interrogatories and Requests for Production Pursuant to the Order of Judge Dickson. The materials produced do not comply with the Order of Judge Dickson.

16. As one example of noncompliance, many responses indicate: "Defendant is still in the process of collecting information responsive to this request and will fully respond to the same as soon as such information is located."

17. Other examples of noncompliance include responses referring Plaintiff's counsel to government agencies for answers when Judge Dickson's Order specifically states that such a response is insufficient.

18. Ultimately, the documents speak for themselves and Defendants' Supplemental Responses to Plaintiff's Interrogatories and Requests for Production Pursuant to the Order of Judge Dickson does not comply with Judge Dickson's Order in timeliness nor in content.

19. Therefore, this Affidavit is submitted in support of Plaintiff's Motion for a Rule to Show Cause and Motion for Sanctions for Defendants' failure to comply with Judge Dickson's Order.

The affiant further saith naught.

UNDER PENATLY OF PERJURY I SWEAR THE ABOVE IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Jennifer Randolph Purdy

Sworn and subscribed before me
this 23rd day of JANUARY, 2017.

Notary Public for South Carolina
My commission expires: 4/21/26

Jennifer

From: Dickson, Edgar W. Law Clerk (John Dodds) <edicksonlc@sccourts.org>
Sent: Wednesday, November 30, 2016 12:53 PM
To: Parker, Leah
Cc: Dickson, Edgar W. Secretary (Peggy Smith); Jennifer; Rowlen, Brantley
Subject: RE: Jean Watkins et al v. Sterling Healthcare et al 2014-CP-40-05160

All,

This email is to inform you that Judge Dickson signed Plaintiff's proposed Order Granting Plaintiff's Motion to Compel this morning. It will be placed in the mail to Ms. Purdy today. Thank you, and please let me know if you have any questions or concerns.

Best,
John

John J. Dodds IV
Law Clerk, Hon. Edgar W. Dickson
First Judicial Circuit
P.O. Box 1949
Orangeburg, SC 29116
803-535-2187 (phone)
803-535-2188 (fax)

"Exhibit D"

Nicholas G. Callas
J. Scott Shirley
Vanessa Crittenden Overbay
Jennifer Randolph Purdy[1]
[1]Also admitted in Georgia
[2]Also admitted in North Carolina

POPOWSKI CALLAS & SHIRLEY, P.A.
ATTORNEYS AT LAW
EMPOWERING THE INJURED

1430 Blanding Street
Columbia, SC 29201
P.O. Box 7397
Columbia, SC 29202
P: 803.799.2100 F: 803.254.0874
www.pcslawyer.com

December 29, 2016

VIA EMAIL AND FIRST CLASS MAIL
Leah Parker, Esquire
Brantley C. Rowlen, Esq.
Lewis, Brisbois, Bisgaard & Smith, LLP
1180 Peachtree Street, NE, Suite 2900
Atlanta, GA 30309-3521

Re: Jean Watkins, as Personal Representative of the Estate of Mildred Watkins v. Sterling Healthcare Inc., Country Wood Nursing Center, LLC, and Guardian Resources, LLC
Civil Action No.: 2014-CP-40-5160

Dear Leah and Brantley:

I hope you both had a nice holiday.

As you are aware, Judge Dickson signed an Order Granting Plaintiff's Motion to Compel on November 30, 2016. In the Order, the defendants were directed to produce the materials and information specified within twenty (20) days of the date of the Order. This time period expired on December 20, 2016.

Please produce all information required by the Order no later than January 6, 2017. If I do not receive all items by this date, I will have no option but involve the Court for assistance with this matter.

Sincerely,

Jennifer Randolph Purdy

JRP/mo

"Exhibit F"

Printed on Recycled Paper

Jennifer

From: Rowlen, Brantley <Brantley.Rowlen@lewisbrisbois.com>
Sent: Tuesday, January 03, 2017 10:46 AM
To: Jennifer; Parker, Leah
Subject: RE: Watkins v. Sterling Healthcare et al.

Jennifer,

Happy new year. We inadvertently did not calendar the date, but are working on gathering the material now. Will get it to you ASAP.

Thanks,

Brantley

LEWIS BRISBOIS

Brantley C. Rowlen
Partner
Brantley.Rowlen@lewisbrisbois.com

T: 404.348.8576 F: 404.467.8845

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From: Jennifer [mailto:Jennifer@pcslawyer.com]
Sent: Thursday, December 29, 2016 3:07 PM
To: Rowlen, Brantley; Parker, Leah
Subject: Watkins v. Sterling Healthcare et al.

Please see attached.

Jennifer Randolph Purdy, Esq.
Popowski, Callas & Shirley, P.A.
1430 Blanding Street
P.O. Box 7397
Columbia, South Carolina 29202
(803) 799-2100 phone
(803) 254-0874 fax
jennifer@pcslawyer.com

Jennifer

From: Parker, Leah <Leah.Parker@lewisbrisbois.com>
Sent: Thursday, January 05, 2017 8:51 AM
To: Jennifer
Subject: RE: Watkins v. Sterling Healthcare et al.

Importance: High

Jennifer,

As Brantley let you know, we had a completely inadvertent calendaring error with regard to this Order deadline, and we very much appreciate your reminder and willingness to provide us with a little additional time. Unfortunately, I had the flu last week and between that and the holiday, I wasn't able to get going on this with our client until this week. I am scrambling to try to get everything together while simultaneously traveling for hearings in Bennettsville, SC on another case. Would you please give us the courtesy of one more week's extension to compile and prepare all of this additional discovery for you. I know this has been a long process, but I assure you, I'm working on this as fast as I can.

Thank you so much,
Leah Parker

LEWIS BRISBOIS

Leah Parker
Attorney
Leah.Parker@lewisbrisbois.com

T: 404.991.2179 F: 404.467.8845

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From: Jennifer [mailto:Jennifer@pcslawyer.com]
Sent: Thursday, December 29, 2016 3:07 PM
To: Rowlen, Brantley; Parker, Leah
Subject: Watkins v. Sterling Healthcare et al.

Please see attached.

Jennifer Randolph Purdy, Esq.
Popowski, Callas & Shirley, P.A.
1430 Blanding Street
P.O. Box 7397
Columbia, South Carolina 29202
(803) 799-2100 phone

Jennifer

From: Jennifer
Sent: Thursday, January 05, 2017 10:57 AM
To: 'Parker, Leah'
Subject: RE: Watkins v. Sterling Healthcare et al.

Leah,

I am very sorry that you have been sick. The flu is terrible and I hope you are feeling better.

While I understand that it is your position that a calendaring error has prevented the timely production of the materials pursuant to Court Order, I will point out that the Judge's clerk notified all parties via email on February 24, 2016 that Judge Dickson was ruling in the Plaintiff's favor on this Motion. This is just weeks shy of one year ago. While I understand you were not involved in the case at that time, your firm certainly was, and one year is ample time to consult with your client and gather this information. Likewise, Judge Dickson's current law clerk notified all parties on November 30, 2016 that Judge Dickson had signed Plaintiff's Order Compelling Discovery. This was more than one month ago. It is concerning that no effort was made to obtain this information from your client at that time, well before holidays, and furthermore, that no effort was made to discuss production of the items with your client at all until this week.

As you are aware, our discovery requests were sent in August 2014. My Motion to Compel was filed in July of 2015. It is now January 2017 and I still do not have the information I need to move forward. The case has been at a total standstill pending resolution of this discovery matter for well over a year. I'm sure you understand my frustration and that of my clients.

I will extend the deadline for one additional week. However, I expect to receive full and complete production no later than January 13, 2017. The Order is very detailed with regard to the information and items to be produced. If any items are missing next week, I will have no option but to seek the involvement of the Court and request the appropriate sanctions. Likewise, I trust that you will also acknowledge to the Court during future status conferences that there were discovery delays in this matter which were not the fault of the Plaintiff.

I look forward to receiving your responses next week.

Thank you,
Jennifer

Jennifer Randolph Purdy, Esq.
Popowski, Callas & Shirley, P.A.
1430 Blanding Street
P.O. Box 7397
Columbia, South Carolina 29202
(803) 799-2100 phone
(803) 254-0874 fax
jennifer@pcslawyer.com

From: Parker, Leah [mailto:Leah.Parker@lewisbrisbois.com]
Sent: Thursday, January 05, 2017 8:51 AM
To: Jennifer <Jennifer@pcslawyer.com>

Subject: RE: Watkins v. Sterling Healthcare et al.
Importance: High

Jennifer,

As Brantley let you know, we had a completely inadvertent calendaring error with regard to this Order deadline, and we very much appreciate your reminder and willingness to provide us with a little additional time. Unfortunately, I had the flu last week and between that and the holiday, I wasn't able to get going on this with our client until this week. I am scrambling to try to get everything together while simultaneously traveling for hearings in Bennettsville, SC on another case. Would you please give us the courtesy of one more week's extension to compile and prepare all of this additional discovery for you. I know this has been a long process, but I assure you, I'm working on this as fast as I can.

Thank you so much,
Leah Parker

LEWIS BRISBOIS

Leah Parker
Attorney
Leah.Parker@lewisbrisbois.com

T: 404.991.2179 F: 404.467.8845

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From: Jennifer [mailto:Jennifer@pcslawyer.com]
Sent: Thursday, December 29, 2016 3:07 PM
To: Rowlen, Brantley; Parker, Leah
Subject: Watkins v. Sterling Healthcare et al.

Please see attached.

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Popowski, Callas & Shirley, P.A.
1430 Blanding Street
P.O. Box 7397
Columbia, South Carolina 29202
(803) 799-2100 phone
(803) 254-0874 fax
jennifer@pcslawyer.com

Plaintiff's Memorandum in Support of Motion for Rule to Show Cause and Sanctions with Exhibits 1-29 of July 31, 2017

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND	)	
	)	Case No.: 2016-CP-40-04463
JEAN WATKINS, as Personal Representative of the Estate of Mildred Watkins,	)	**PLAINTIFF'S MEMORANDUM IN SUPPORT OF MOTION FOR RULE TO SHOW CAUSE AND SANCTIONS**
Plaintiff,	)	
vs.	)	
STERLING HEALTHCARE, INC., COUNTRY WOOD NURSING CENTER, LLC, and GUARDIAN RESOURCES, LLC,	)	
Defendants.	)	

RICHLAND COUNTY FILED
2017 JUL 31 AM 8:49
JEANNETTE W. WALKER C.C.P. & G.S.

TO: BRANTLEY ROWLEN, ESQUIRE AND LEAH PARKER, ESQUIRE, ATTORNEYS FOR DEFENDANTS:

Pursuant to Rule 37(b) of the South Carolina Rules of Civil Procedure, the Plaintiff, by and through her undersigned counsel, filed this motion for a Rule to Show Cause as to why the Defendants should not be held in contempt of Court and suffer sanctions for failure to comply with the Order of the Honorable Judge Edgar W. Dickson, signed on November 30, 2016. In support of this Motion, the Plaintiff shows the following to the Court:

BACKGROUND

The Plaintiff's decedent, Mildred Watkins, was a resident of the Defendants' nursing home, Country Wood, from March 2011 until December 2011. The Plaintiff filed a Complaint against all defendants alleging negligence which resulted in injuries to the Plaintiff and ultimately caused her death. (See Complaint) Plaintiff served all Defendants with discovery requests on or about August 22, 2014 and counsel for the Defendants accepted service on September 5, 2014. The Defendants submitted partial responses on or about November 20,

2014. Thereafter, Plaintiff's counsel wrote defense counsel March 25, 2015 to request supplemental responses. On May 5, 2015, Defendant Countrywood supplemented their responses, but only to include the identification of an expert and to provide his Curriculum Vitae. On September 25, 2015, Defendant Countrywood provided a Third Supplemental Response, but this response only included: portions of the employee handbook, most pages of which were redacted in their entirety, (in response to Interrogatory #23 and RPD #39); redacted contracts related only to Evergreen and Health Services, which did not cover the date of Plaintiff's admission (in response to Interrogatory #26); records from the Richland County Sheriff's Department (in response to Interrogatory #46 and RPD #48); and the fee schedule of the defense expert (in response to RPD #3). Thereafter, the Plaintiff notified defense counsel in writing that the Plaintiff had not yet been provided with the most basic of discoverable documents, including, but not limited to the Plaintiff's Care Plan. Ultimately, the Care Plans were later forwarded by defense counsel via email. No additional documents or responses were produced at that time.

The Plaintiff remains without essential documents and information necessary to prepare her case or even take depositions of critical witnesses. The information withheld by the defense is essential to the Plaintiff's claim and there is no legitimate reason for the defense to withhold the same. At the time of the filing of her Motion to Compel, the Plaintiff had been provided with only two documents from Defendant Sterling and Defendant Guardian (the Articles of Incorporation and a "Consulting Agreement" with Country Wood). The Defense refused to provide any additional documents or responses. The Plaintiff filed a Motion to Compel on July 29, 2015 and this matter was scheduled for a hearing on February 24, 2016.

The Honorable Edgar Dickson heard the Plaintiff's Motion to Compel on February 24, 2016. Later that afternoon, counsel for both parties received an email from Emily Burgis, the

law clerk who assisted Judge Dickson at the hearing, advising that Judge Dickson had granted Plaintiff's Motion to Compel and requesting that both parties submit proposed Orders. Debate ensued with defense counsel over the specific statements made by Judge Dickson during the hearing. As such, Plaintiff's counsel had to incur the expense of obtaining the hearing transcript for Judge Dickson's review. On November 30, 2016, John Dodds, law clerk to Judge Dickson, emailed counsel for both parties and advised that Judge Dickson had signed the Plaintiff's version of the Order Granting Plaintiff's Motion to Compel Against All Defendants. (See Exhibit A to Plaintiff's Motion for Rule to Show Cause and Sanctions) All Defendants were directed to produce the information specified within twenty (20) days of the date of the Order. *Id.* The time period specified in the Order expired on December 20, 2016. *Id.* No information was produced by the Defendants by December 20, 2016. (See Exhibit C to Plaintiff's Motion for Rule to Show Cause and Sanctions, Affidavit of Jennifer Purdy, Esq., with Exhibits)

On December 29, 2016, Plaintiff's counsel sent a letter to counsel for Defendants asking for production of all documents and information specified in the Order no later than January 6, 2017. *Id.* On January 3, 2017, Plaintiff's counsel received an email from Brantley Rowlen, Esq., counsel for Defendants, advising that they "inadvertently did not calendar the date" but were gathering the information. *Id.* Subsequently, on January 5, 2017, Leah Parker, Esq., counsel for Defendants contacted Plaintiff's counsel by email, again referencing the "inadvertent calendaring" and stated that due to the holidays and an illness, she had been unable to communicate with her client about the discovery production ordered by Judge Dickson until that week. She requested an extension of one additional week to produce the information specified in the Order. *Id.* Plaintiff's counsel responded via email on January 5, 2017 and pointed out the extended amount of time that defense counsel had been aware of Judge Dickson's ruling, since

February 24, 2016, as well as the amount of time that defense counsel had been aware of the signed Order of November 30, 2016. *Id.* Plaintiff's counsel agreed to extend the deadline to January 13, 2017 if she ***received*** full and complete production of documents and information by that date. *Id.* In Plaintiff's counsel's email, she further noted that she would have to seek in the involvement of the Court if she did not receive full and complete production by that date. *Id.* As of January 13, 2017, Plaintiff's counsel had received no information from the Defendants. *Id.*

On January 19, 2017, Plaintiff's counsel received Defendants' Supplemental Responses to Plaintiff's Interrogatories and Requests for Production Pursuant to the Order of Judge Dickson. (See Exhibit B to Plaintiff's Motion for Rule to Show Cause and Sanctions) The materials produced do not comply with the Order of Judge Dickson. As examples of noncompliance, many responses indicated: "Defendant is still in the process of collecting information responsive to this request and will fully respond to the same as soon as such information is located." *Id.* Other examples of noncompliance included responses referring Plaintiff's counsel to government agencies for answers despite the fact that Judge Dickson's Order specifically stated that such a response is insufficient. *Id. and Dickson Order* Ultimately, the responses speak for themselves and Defendants' Supplemental Responses to Plaintiff's Interrogatories and Requests for Production Pursuant to the Order of Judge Dickson do not comply with Judge Dickson's Order in timeliness nor in content.

Plaintiff filed this Rule to Show Cause and Motion for Sanctions on January 23, 2017 and counsel for Defendants were served with the same. In the six (6) month period that Plaintiff's counsel was awaiting a hearing date, no further documents or information were produced by any Defendant until this week, just days prior to the hearing scheduled on Plaintiff's Motion for a Rule to Show Cause and Sanctions.

It is also important to note that this case was removed from the roster July 31, 2015, pursuant to Rule 40(j), out of necessity due to the lack of discovery responses received from the Defendants and the need for on-going discovery. The case was restored to the docket one year later, in July 2016. At the time the case was restored in July 2016, no additional information had been produced to the Plaintiff by the Defendants in the one year since the case was removed from the docket. The case has now appeared on the July 31, 2017 trail docket. The Plaintiff is still without the complete discovery responses, despite Judge Dickson's Order, and thus, has been unable to schedule critical depositions necessary to prepare for trial, which is now scheduled within the next few weeks. The prejudice to the Plaintiff as a result of the delay in complying with discovery requirements and a Court Order is substantial.

LAW AND ANALYSIS

The discovery process enables parties to know before the trial beings what evidence may be presented. "The primary objective of discovery is to ensure that lawsuits are decided by what the facts reveal, not by what facts are concealed." *In re Anonymous Member of South Carolina Bar*, 346 S.C. 177, 193m 552 S.E.2d 10,18 (2001) (quoting *In re Alford Chevrolet-Geo*, 997 S.W.2d 173, 180 (Tex. 1999) The judiciary expects lawyers to police themselves and to participate fairly in the discovery process, but when that ideal is not met, the responsibility for preventing discovery abuse rests on the shoulders of the trail judges. *Id.*

South Carolina Rules of Civil Procedure 37(b)(2) states:

> **"If a party or an officer, director, or managing agent of a party or a person designated under Rule 30(b)(6) or 31(a) to testify on behalf of a party fails to obey an order to provide or permit discover, including an order made under subdivision (a) of this rule or Rule 35, or if a party fails to obey an order entered under Rule 26(f), the court in which the action is pending may make such orders**

in regard to the failure as are just, and among others the following:

> **(A) An order that the matters regarding which the order was made or any other designated facts shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order;**
> **(B) An order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting him from introducing designated matters in evidence;**
> **(C) An order striking out pleadings or parts thereof, or staying further proceedings until the order is obeyed, or dismissing the action or proceeding or any part thereof, or rendering a judgment by default against the disobedient party;**
> **(D) In lieu of any of the foregoing orders or in addition thereto, and order treating as contempt of court the failure to obey any orders except an order to submit to a physical or mental examination;**
> **(E) Where a party has failed to comply with an order under Rule 35(a) requiring him to produce another for examination, such orders are listed in paragraphs (A), (B), and (C) of this subdivision, unless the party failing to comply show that he is unable to produce such person for examination.**
> **In lieu of any of the foregoing orders or in addition thereto, the court shall require the party failing to obey the order or the attorney advising him or both to pay the reasonable expenses, including attorney's fees, caused by the failure, unless the court finds that the failure was substantially justified or that other circumstances make an award of expenses unjust."**

"The entire thrust of the discovery rules involves full and fair disclosure, to prevent a trail from becoming a guessing game or one of surprise for either party." *Samples v. Mitchell*, 329 S.C. 105, 113, 495 S.E.2d 213, 217 (Ct. App. 1997) (internal quotations omitted). The discovery process is designed to prevent guessing games. *See, e.g. U.S. v. Proctor & Gamble Co.*, 356 U.S. 677, 682 (1958). "The rights of discovery provided by the Rules gives the trial lawyer the means to be prepared for trial. Where these rights are not accorded, prejudice must be presumed . . . ." *Downey v. Dixon*, 294 S.C. 42, 46, 362 S.E.2d 317, 319 (Ct. App 1987)

"The imposition of sanctions is generally entrusted to sound discretion of the Circuit Court. *Morgan v. Jones* 281 S.C. 270, 276, 315 S.E.2d 136, 139 (Ct. App. 1984) Whatever

sanction is imposed should serve to protect the rights of discovery provided by the Rules. *Downey v. Dixon*, 294 S.C. 42, 45, 362 S.E.2d 317, 318 (Ct. App 1987) "Overleniency [in imposition of sanctions] is to be avoided where it results in inadequate protection of discovery." *Id.* at 45, *quoting* C. Wright, *The Law of Federal Courts* §90 at 596 (4th ed. 1983) ("Without adequate sanctions, the procedure for discovery would be ineffectual.") The most severe sanctions must be available to a court, not only to penalize those whose conduct warrants sanctions, but to deter those who may consider such conduct in the future. *Downey* at 45, *quoting, National Hockey League v. Metropolitan Hockey Club, Inc.*, 427 U.S. 639 (1976) (dictum). The Courts have held that sanctions that are too lenient tend to encourage, rather than discourage, noncompliance with the Rules. *See, Downey* at 45-46.

In determining whether to order sanctions, the trial judge should consider the nature of the discovery request, the discovery posture of the case, the willfulness of the violation, and the degree of prejudice to the opposing party. *Historic Charleston Holdings, LLC v. Mallon*, 381 S.C. 417, 435, 673 S.E.2d 448, 457 (2009). Other courts concur: "In determining the appropriateness of a sanction, the court should consider such factors as the precise nature of the discovery and the discovery posture of the case, willfulness, and degree of prejudice." *Griffin Grading & Clearing, Inc.*, 334 S.C. at 199, 511 S.E.2d at 719. Under Rule 37(b)(2)(C), SCRCP, when a party fails to comply with a discovery order, the trial court has the discretion to impose a sanction it deems just, including an order dismissing the action. *Barnette v. Adams Bros. Logging, Inc.*, 355 S.C. 588, 593, 586 S.E.2d 572, 575 (2003). Absent an abuse of discretion, the trial court's imposition of discovery sanctions will not be reversed on appeal, and the party appealing from the order of sanction carries the burden of proving an abuse of discretion occurred. *Id.*

As stated above, sanctions for discovery abuse are left to the sound discretion of the trial court. *See Barnette,* 355 S.C. at 593, 586 S.E.2d at 575. However, severe sanctions, such as the dismissal of an action, should only be imposed in cases involving bad faith, willful disobedience, or gross indifference to the opposing party's rights. *See Orlando v. Boyd,* 320 S.C. 509, 511, 466 S.E.2d 353, 355 (1996); *Baughman v. Am. Tel. & Tel. Co.,* 306 S.C. 101, 108-09, 410 S.E.2d 537, 541-42 (1991); *Griffin Grading & Clearing, Inc. v. Tire Serv. Equip. Mfg. Co.,* 334 S.C. 193, 198-99, 511 S.E.2d 716, 719 (Ct.App.1999).

In *McNair v. Fairfield County*, 379 S.C. 462, 665 S.E.2d 830 (Ct. App. 2008), the Court upheld the trial court's decision to strike the Defendant's answer as a sanction for discovery abuse. The Court noted: "[T]he defense still has not produced documents 7½ months after this Court passed an Order granting plaintiff's motion to compel. The delay caused by defendant is a further prejudice to plaintiff's right to have his claim heard. . . ." *Id.* at 832 "The defendant is to blame for this unconscionable delay, and the defendant's conduct amounts to contempt." *Id.* The Court considered whether a sanction less than striking the Answer would achieve justice, and this Court concludes not. . . ." *Id.* "The defendant's conduct in refusing to provide that which it has been ordered to produce is a serious affront to the integrity of the judicial system. . . . The defendant's failure to make any attempt to comply with the court order compelling discovery is a blatant violation of Rule 37(b)(2), SCRCP. *Id.* The delay in producing discovery responses by the Defendant in *McNair* is comparable to the Defendants' conduct in this case. It has been over seven (7) months since Judge Dickson's Order was signed, more than sixteen (16) months since Judge Dickson's law clerk advised the Defendants that Judge Dickson granted Plaintiff's Motion to Compel, and just two months shy of three (3) years since the Defendants were served with discovery. In *McNair*, the Court determined that the trial court considered the appropriate

factors, and determined the Defendant's willful disobedience of a court order warranted the severe sanction of striking the Answer. Certainly, similar sanctions are warranted in this case.

The selection of a sanction for discovery violations is within the trial court's discretion. *Kershaw County Bd. of Educ. v. United States Gypsum Co.*, 302 S.C. 390, 396 S.E.2d 369 (1990). The court will not interfere with that decision unless the trial court abused its discretion. *Clark v. Ross*, 284 S.C. 543, 328 S.E.2d 91 (Ct.App.1985). An abuse of discretion may be found where the appellant shows that the conclusion reached by the trial court was without reasonable factual support and resulted in prejudice to the rights of appellant, thereby amounting to an error of law. *Dunn v. Dunn*, 298 S.C. 499, 502, 381 S.E.2d 734, 735 (1989).

If a party fails to obey an order to provide or permit discovery, the trial court may impose sanctions such as striking pleadings, dismissing the action, or rendering a default judgment. *See*, Rule 37(b)(2)(C), SCRCP. When the court orders default or dismissal, or the sanction itself results in default or dismissal, the end result is harsh medicine that should not be administered lightly. *See Orlando v. Boyd*, 320 S.C. 509, 466 S.E.2d 353 (1996). Therefore, the sanction should be aimed at the specific conduct of the party sanctioned and not go beyond the necessities of the situation to foreclose a decision on the merits of a case. *Balloon Plantation, Inc. v. Head Balloons, Inc.*, 303 S.C. 152, 399 S.E.2d 439 (Ct.App.1990). Where the sanction would be tantamount to granting a judgment by default, the moving party must show bad faith, willful disobedience or gross indifference to its rights to justify the sanction. *Baughman v. American Tel. & Tel. Co.*, 306 S.C. 101, 410 S.E.2d 537 (1991). Defendants were served with discovery from the Plaintiff on September 5, 2014. Nearly three (3) years later, and following a Court Order compelling discovery, the Plaintiff remains without all of the information ordered by Judge Dickson and has been substantially prejudiced in the advancement of her case. The failure

of the Defendants to produce the documents and information requested, particularly after being ordered to produce the same by Judge Dickson, is evidence of their on-going bad faith, willful disobedience, and gross indifference to the rights of the Plaintiff and the authority of the Court. The sanction of striking the Defendants' answer is clearly warranted in this case.

Likewise, the Plaintiff is entitled to attorney's fees and expenses incurred in the attempts to force the Defendants compliance with the discovery rules and the Order of Judge Dickson. "The award of attorney fees is generally within the sound discretion of the trial court. *Woodward v. Woodward*, 294 S.C. App. 210, 363 S.E.2d 413 (Ct. App. 1987) Plaintiff's counsel has invested tremendous time and expense in her attempts to force the Defendants compliance with the discovery rules and with Judge Dickson's Order. The Plaintiff has incurred the expense associated with filing two (2) motions and also obtaining the hearing transcript from the Motion to Compel hearing with Judge Dickson. Attorney's fees and costs are also warranted as sanctions in this case.

In a recent Order by the late Honorable Tanya A. Gee upholding significant monetary sanctions she had imposed on a defendant[1], Judge Gee quoted Chief Justice Roberts from his December 31, 2015 Year End Report on the Federal Judiciary[2]:

> "I cannot believe that many members of the bar went to law school because of a burning desire to spend their professional life . . . evading legitimate requests through dilatory tactics. The test for plaintiff's and defendants' counsel alike is whether they will affirmatively search out cooperative solutions, chart a cost-effective course of litigation, and assume shared responsibility with opposing counsel to achieve just results."

Clearly, the actions of the Defendants in this case do not align with the philosophy of the Chief Justice in form or substance.

[1] See Order Denying Reconsideration of Sanctions Award, *Greenburg v. Five Star Quality Care*, et al, 2013-CP-40-03071

[2] http://www.supremecourt.gov/publicinfo/year-end/2015year-endreport.pdf

CONCLUSION

The Plaintiff's discovery requests were submitted to the Defendants on September 5,2014. Despite multiple attempts by the Plaintiff to obtain complete and accurate responses from the Defendants, including obtaining a Court Order compelling discovery, the Plaintiff is no farther along in the discovery process than she was two years ago when she filed her Motion to Compel. The unreasonably delays in the production of discovery documents for over two (2) years has resulted in the complete standstill of the case and the total inability of the Plaintiff to further her client's interests. In this passing time, memories fade, witnesses disappear, and critical documents could be lost and/or destroyed. The harm to the Plaintiff in this case is irreparable and should be met with the harshest of sanctions against the Defendants.

THERFORE, the Plaintiff requests that the Court grant her motion against all Defendants and enter an Order for sanctions, costs and attorney's fees, and for such other relief as the Court deems just and proper.

POPOWSKI, CALLAS & SHIRLEY, P.A.

Jennifer Randolph Purdy
Attorney for Plaintiff
P.O. Box 7397
Columbia, South Carolina 29202
(803) 799-2100 phone
(803) 254-0874 facsimile
Jennifer@pcslawyer.com

Columbia, South Carolina
July 5, 2017

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND JEAN WATKINS, as Personal Representative of the Estate of Mildred Watkins, Plaintiff, vs. STERLING HEALTHCARE, INC., COUNTRY WOOD NURSING CENTER, LLC, and GUARDIAN RESOURCES, LLC, Defendants.	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT Case No.: 2016-CP-40-04463 **PLAINTIFF'S EXHIBITS IN SUPPORT OF MOTION FOR RULE TO SHOW CAUSE AND SANCTIONS**

EXHIBITS

1. Order of Judge Edgar Dickson dated November 30, 2016.
2. Affidavit of Jennifer Purdy dated January 23, 2017 (Filed with Plaintiff's Motion for Rule to Show Cause and Sanctions as Exhibit C)
3. Plaintiff's Chart of Defendant Countrywood's Responses to Interrogatories
4. Plaintiff's Chart of Defendant Countrywood's Responses to Requests for Production
5. Plaintiff's Chart of Defendant Sterling's Responses to Interrogatories
6. Plaintiff's Chart of Defendant Sterling's Responses to Requests for Production
7. Plaintiff's Chart of Defendant Guardian's Responses to Interrogatories
8. Plaintiff's Chart of Defendant Guardian's Responses to Requests for Production
9. Certificate of Liability Coverage
10. Order of the late Honorable Tanya Gee's Order Granting Sanctions and Order Denying Reconsideration of Sanctions Award in Greenburg v. Five Star Quality Care, Inc. et al. (2013-CP-40-03071
11. South Carolina Rules of Civil Procedure Rule 37

12. *McNair v. Fairfield County*, 379 S.C. 830 (Ct. App. 2008)

13. *Griffin Grading and Clearing, Inc. v. Tire Service Equipment Manufacturing Co., Inc.* 334 S.C. 193 (Ct. App. 1999)

14. *Downey v. Dixon*, 294 S.C. 42 (Ct. App. 1987)

15. *Barnette v. Adams Brothers Logging* Inc. et al., 355 S.C. 588

16. *Dunn v. Dunn*, 298 S.C. 499 (1989)

17. *Kershaw County Board of Education v. United States Gypsum Co.*, 302 S.C. 390 (1990)

18. *Baughman v. American Telephone and Telegraph Co.*, 306 S.C. 101 (1991)

19. *Orlando v. Boyd*, 320 S.C. 509 (1996)

20. *Historic Charleston Holdings, LLC v. Mallon*, 673 S.E.2d 448 (2009)

21. *Morgan v. Jones*, 281 S.C. 270 (1984)

22. *U.S. v. Procter*, 356 U.S. 677 (1958)

23. *Samples v. Mitchell*, 329 S.C. 105 (Ct. App. 1997)

24. In Re Anonymous Member of the SC Bar, 346 S.C. 177 (2001)

25. Thornton v. Thornton, 294 S.C. 512 (Ct. App. 1988)

26. *Davis v. Parkview Apartments*, 409 S.C. 266 (2014)

27. *Clark v. Ross*, 284 S.C. 543 (1985)

28. *Balloon Plantation v. Head Balloons, Inc.*, 303 S.C. 152 (Ct. App. 1990)

29. *Woodward v. Woodward*, 294 S.C. 210 (Ct. App. 1987)

EXHIBIT 3

Interrogatory to COUNTRYWOOD #2	Countrywood's Original Response: 11/20/2014	Countrywood's Supplemental Response 1/13/2017	Judge Dickson's ORDER	Current Status
Identify all insurance companies which provide any type of liability insurance coverage, including but not limited to first party liability policies, self-insured retention policies, liability policies covering individual employees, owners, members, shareholders or key individuals; and/or policies of excess and/or umbrella coverage, and set forth the numbers of policies involved, the policy period dates, and the amounts of liability insurance coverage provided in these policies, including any deductibles.	**Original Response:** Defendant objects to Interrogatory No. 2 to the extent it calls for information that constitutes a legal conclusion. Defendant further objects on the grounds that Interrogatory No. 2 seeks information regarding this Defendant's insurer's attitudes towards questions of coverage, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ballard v. Allegheny Airlines Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced herewith, but states that, for purposes of this claim, Defendant is self-insured.	**Supplemental Response:** Defendant refers Plaintiff to its Response to Request for Production No. 7 below. Response to RFPD 7 states: **Original Response:** Defendant objects to this Request to the extent it calls for a legal conclusion. Defendant further objects on the ground that it seeks information regarding the Defendant's insurer's attitudes towards questions of coverage, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ballard v. Allegheny Airlines Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving these objections, Defendant is not aware of any insurance policies in its name that may be applicable to Plaintiff's claims. **First Supplemental Response:** Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is in the process of obtaining Certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt. **Second Supplemental Response:** Defendant is in the process of obtaining Certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #2. Additionally, this order specifically directs the Defendants to produce and all insurance documents, policies, endorsements, declarations pages, etc. which provide coverage of any type to any or all of the Defendant's owners, members, shareholder, key employees, etc., including but not limited to Robert Hagan.	Countrywood produced a 2 page ACORD insurance certificate which shows $50,000 in commercial general liability coverage in the name of Guardian Resources, LLC. Countrywood is listed on the form. There is no information provided as to the name of the insurance company and no policy was provided as required by Judge Dickson's order. Only the agent's name in Tennessee. Likewise, no insurance information was provided for any owners, including but not limited to Robert Hagan. No other supplement or insurance information has been provided for Countrywood. **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to COUNTRYWOOD #3	Countrywood's Original Response: 11/20/2014	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶7)	Current Status
If you contend that some other person or legal entity is, in whole or in part liable to you or the party asserting a claim against you in this matter and you contend that said person or entity should be made a party to this lawsuit, identify such person or entity, describe the basis of said liability, and identify the name and current address of each witness who can testify to each fact you rely upon for said contention.	Defendant objects to Interrogatory No. 3 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objection, Defendant contends that any of Decedent's medical providers outside Country Wood could have caused the alleged injuries that are the subject of Plaintiffs claims, including, but not limited to, Palmetto Health Richland, Capital City Ambulance, and Regional Ambulance Service. Defendant reserves the right to supplement this Response in accordance with the South Carolina Rules of Civil Procedure as discovery in this case proceeds.	**First Supplemental Response:** Defendant renews its objections to this interrogatory as stated in its Original Response above. Subject to and without waiving these objections, Defendant again states that discovery is still ongoing in this matter and does not have any additional discoverable information to disclose at this time. Defendant reserves the right and will supplement this Response in accordance with the South Carolina Rules of Civil Procedure if and when any discoverable information is obtained by Defendant. **Second Supplemental Response: 1/13/17** Defendant contends that any of Decedent's medical providers outside Countrywood could have caused the alleged injuries that are the subject of the Plaintiff's claims, including but not limited to, Palmetto Health Richland, Capital City Ambulance, and Regional Ambulance Service. However, as Discovery is ongoing in this matter, Defendant is presently unaware of any specific evidence and/or of the relevant of any specific evidence in showing responsibility of other individuals and/or entities for Plaintiff's injuries and death. In the event such specific evidence is obtained and/or the relevance of existing evidence	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #3. Additionally, this Order specifically directs the Defendants to point to specific evidence in support of their allegations that other individuals and/or entities are responsible for the Plaintiff's injuries and Death and/or to admit that there are liable parties to this matter other than those already named in this litigation.	Supplemental response still does not comply with the Order: **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to Countrywood #4	Countrywood's Original Response: 11/20/2014	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶7)	Current Status
Give the names and address of each person known to the parties or counsel to be a witness concerning the facts of the case and/or that you intend to call as a witness at the trial of this case. For each person known to the parties or counsel to be a witness, set forth a summary sufficient to inform the other party of the important facts known to be observed by such witness, indicate whether a statement has been taken from said party or witness, and provide a copy of any written or recorded statements taken.	Defendant objects to Interrogatory No. 4 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 4 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant generally identifies employees of Country Wood, employees of Decedent's medical providers and Decedent's family members. In further response, Defendant is not aware of any statements taken of any of the aforementioned witnesses, except for those statements made in Plaintiff's medical records produced concurrently herewith	Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, Defendant identifies the individuals below as potential witnesses to the facts of this case. All of these individuals are current or former employees of Country Wood or current or former therapists/ therapy assistants provided to Country Wood through a contract with Evergreen Rehabilitation. These individuals either provided care to Decedent while she was a resident or Country Wood or otherwise have knowledge of the care provided to Decedent while she was a resident of Country Wood. No statements have been taken from any or these witnesses except as contained in Decedent's medical records, which were previously produced, and each individual 's personnel file, which are being produced herewith pursuant to a Consent Protective Order signed by counsel (except for those individuals provided by Evergreen, which counsel is currently attempting to obtain and will provide upon receipt). All current employees may be contacted through counsel. The individuals Defendant identifies as witnesses are as follows: Joe Hunt Administrator; Dr. Steven Barnett; Bryan Harbison; Rebecca Deppe; William Litrell; Jacqueline Addison; Talicia Robinson; Betty Atkinson; Dianne Elliot; Becky Buhlinger; Neal Shephard; Marie Tinker; Latoya Davis; Josephine Sydnor; Marguerita Shaw; Mary Archie; Melissa Atkins; Lula Stroman; Rosa Sumter; Alice Harper; Michael Williams; Gloria Gilmore; Mary Green; Anita Simmons; Teresa Bristow; Felicia Jackson; Carmen Blevins; Charity Kennedy; Monica Gilmore: Caroline Wilson; Geneva Murray; Timeshay Brown; Chaundreka Shepard; Christy Samuels: Mary Harris; Pamela Low; Brittany Palmer; Vanessa Wall; Faith Huguenin; Edward Crowder; Daryl Hauptman: Dorine Evans: Julie Dixon; Brittany Fleming; Erika Stack; Orissa Hewitt; Tera Davis; Jennie Jordan; Tammy Adamson: Dominic Holman; Stanley Dove; Marris Greene; Lorena Green; Ellen Burden; and Dianne Hix. Defendant also identifies all of Decedent 's outside medical providers identified in Decedent's medical records previously produced to Plaintiff, and all witnesses identified by Plaintiff in her discovery responses. Defendant reserves the right to further supplement this response as discovery in this case proceeds. **Second Supplemental Response: 1/13/17** In addition to the witnesses identified in Defendant's first two Responses to the subject Interrogatory, defendant identifies the following individuals provided by Evergreen: Mia McCall, Vickie Cannady; Stephanie Hale; Candace White; Crystal Coleman; Mary McGinn, and Eric Brown. Defendant reserves the right to further supplement this response as discovery in this case proceeds.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #4. Additionally, this Order specifically directs the Defendants to provide the names of any and all witnesses to this matter, and specifically, all individuals who provided any care, treatment, or services to the Plaintiff while she was a resident of Countrywood, including but not limited to those individuals listed in Plaintiff's Memorandum. Defendant is further Ordered to provide employee files for these individuals, including but not limited to those individuals listed in Plaintiff's Memorandum, and to obtain the employee files from independent and contracted individuals and companies. Defendant is also ordered to provide complete and un-redacted contracts between the Defendants and independent contractors and companies providing services to Country Wood and its patients during the period of Plaintiff's residency.	Supplemental responses still do not comply with the Order. While they have provide a list of employees they do not specify as to which employees are actually witnesses or the facts known and observed by such witnesses. **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to COUNTRYWOOD #6	Countrywood's Original Response: 11/20/2014	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶9)	Current Status
Identify all photographs, plats, sketches, videotapes, audiotapes, pictures, nursing home records, nursing home bills, drawings, artist's renditions, x-rays, ultrasounds, diagrams, notes, measurements, statements, plats, laboratory slides, laboratory specimens, or laboratory "cuts", electronic data files, jpg files, data emails, web pages, brochures, information packets, or other documents or materials now or previously in possession, custody or control of the Defendant that relate to any claim or defense in the case and produce a copy of each.	**Original Response:** Defendant objects to Interrogatory No. 6 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 6 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith for information responsive to Interrogatory No. 6. Defendant reserves the right to supplement its Response to Interrogatory No.6 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see the additional documents produced herewith, including page 2080 of Defendant's original document production, which was inadvertently disclosed as a blank page. After review of Defendant's original document production, Defendant believes that there were no documents contained on pages 2057 to 2060 and that there was an error in the numbering of the pages. Defendant reserves the right to supplement and amend this Response as discovery in this case proceeds. **Second Supplemental Response: 1/13/17** Defendant refers Plaintiff to the documents previously produced pursuant to Defendant's original and First Supplemental Response to this Interrogatory. Defendant also refers Plaintiff to its Response to Request for Production No.7 below. In the event additional responsive information is identified, Defendant will seasonably supplement this Response. **Defendant's Second Supplemental Response to RFPD #7 is:** Defendant is in the process of obtaining certificates of Insurance for policies in place during Decedent's residency and will supplement this Response upon receipt.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #6 and 30. This request further Orders the Defendant to provide a detailed response to his request and not merely refer the Plaintiff to Bates stamped items 002057-002059, which are not responsive to #30.	This response is not responsive to this request. No other supplemental or insurance information has been provided by Countrywood. **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to COUNTRYWOOD #7	Countrywood's Original Response: 11/20/2014	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶9)	Current Statu
For each employee of the Defendant or person working at the Defendant's skilled nursing facility, who filled out any portion of, signed, or initialed the medical records of Mildred Watkins when she was a resident, identify the person, the official title or position, and whether the person was/is employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known. Furthermore, please identify each and every nurse, nurses' aide and/or CNA, who cared in any way for Mildred Watkins but whose name does not appear in the chart or medical records and state if that person was/is employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known.	**Original Response:** Defendant objects to Interrogatory No. 7 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced concurrently herewith for the identity of individuals who attended to, cared for and/or had contact with the Decedent. Decedent was a resident of Defendant's facility for over eight (8) months and numerous individuals attended to her during her stay. Should Plaintiff propound a narrowly tailored interrogatory and/or identify those employees she wishes to depose. Defendant will promptly provide additional information and advise as to their employment status. Defendant objects to Interrogatory No. 6 to the extent it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith for information responsive to Interrogatory No. 6. Defendant reserves the right to supplement its Response to Interrogatory No.6 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see personnel files of the individuals identified in Defendant's supplement Response to Interrogatory #4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this response upon receipt. **Second Supplemental Response: 1/13/17:** Defendant refers Plaintiff to the medical records and personnel files previously produced and to Defendant's Response to Interrogatory #3 above. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this response upon receipt. Additionally, pursuant to the Discovery order of Judge Dickson, Defendant is working to locate current information regarding the employment status, present employment and last known address for the numerous employees and former employees identified in Defendant's Responses, including respond to Integratory #4 above, and Defendant will supplement this Response with that information as it is obtained. **Third Supplemental Response: 7/3/17:** Defendant refers Plaintiff to the attached document identifying the Administrator, Registered Nurse Manager, Registered Nurse/Director of Nursing, Licensed Practical Nurse, Registered Dietician, PTA Rehab Director, Physical Therapist, Speech Therapist, and Social Worker. Fourth Supplemental Response: 7/6/2017: Defendant has confirmed that Dianne Hix was not an employee of Countrywood and accordingly, Countrywood does not have a personnel file for Ms. Hix in its possession. Defendant states that upon information and belief, it has fully responses [sic] to Plaintiff's Interrogatory #7.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #7, 8, 9, and 10. These interrogatories relate to employee, administrators, consultants, and contract workers who had any involvement with the care and treatment of the decedent. The Court orders that the employment status, last known address and present employment be provided for all individuals who had any involvement with the decedent during her residency and that complete employment files be provided for the same. This Order includes, but is not limited to the list of individuals provided by Plaintiff in her Memorandum.	The document referenced in Defendant's **Third Supp. Response dated 7/3/17** was not produced. The Plaintiff remains without information ordered by Judge Dickson. No other supplement or further information has been provided b Countrywood. **RESPONSE REMAINS INCOMPLETI**

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Interrogatory to COUNTRYWOOD #8	Countrywood's Original Response:	Countrywood's Supplemental Response 1/13/2017	Judge Dickson's ORDER	Current Status
For the time period of Mildred Watkins' stay, state the name, most current or last known address, social security number, professional registration/license number, title, position and dates employed for the following: administrator; head, charge and/or floor staff for the unit, wing, section or floor on which Mildred Watkins resided; and all dietary, nutrition or other consultants and, for each, indicate whether or not that person is still employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known.	Defendant objects to Interrogatory No. 8 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 8 on the grounds it seeks to make confidential information, such as employee social security numbers, part of the written record. Subject to and without waiving the foregoing objection, Defendant states that Joe Hunt was the Administrator of Country Wood during Decedent's residency and he maintains that position today. Mr. Hunt has worked in the assisted living/nursing home field for over forty (40) years. He holds a Dual License in skilled nursing and assisted living from the South Carolina Department of Labor, Licensing and Regulation Board of Long Term Health Care. Rebecca Deppe, RN, was the Director of Nursing at Country Wood during Decedent's residency and she maintains that position today. Mr. Hunt and Ms. Deppe may be contacted through undersigned counsel. In further response, Defendant refers Plaintiff to documents produced herewith. Defendant reserves the right to supplement its Response to Interrogatory No. 8 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Defendant further objects to providing any individual's social security number due to privacy and risk of identity theft. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the tile for Dianne Hix and will supplement this Response upon receipt. **Second Supplemental Response 1/13/17:** Defendant renews its objection to providing any individual's social security number in the written record due to the privacy and identify theft risks. Subject to and without waiving these objections, Defendant refers Plaintiff to the personnel files of Joe Hunt and Rebecca Deppe, RN, previously produced pursuant to a Consent Protective Order signed by counsel. In further response, Defendant is still in the process of obtaining the personnel file for Dianne Hix and will supplement this Response upon receipt.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #7, 8, 9, and 10. These interrogatories relate to employee, administrators, consultants, and contract workers who had any involvement with the care and treatment of the decedent. The Court orders that the employment status, last known address and present employment be provided for all individuals who had any involvement with the decedent during her residency and that complete employment files be provided for the same. This Order includes, but is not limited to the list of individuals provided by Plaintiff in her Memorandum.	The document referenced in Countrywood's **Third Supplemental Response dated 7/3/17** was not produced. No employment status information, last known contact information, etc. has been provided for any employees. The Plaintiff remains without information ordered by Judge Dickson. No other supplemen or further informatio has been provided b Countrywood. **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to COUNTRYWOOD #9	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶9)	Current Status
For the time period of Mildred Watkins's stay, please state the name, last known or most current address, social security number, professional registration/license number and title for all personnel on duty, per shift on the floor, unit wing or section on which Mildred Watkins resided, who were responsible for transferring, repositioning and turning Mildred Watkins, monitoring Mildred Watkins, bathing Mildred Watkins, monitoring her skin, or otherwise providing care, treatment, and supervision and, for each, indicate whether or not that person is still employed by the Defendant. If that person is not presently employed by the Defendant, state the person's last known address and present employment, if known.	**Original Response:** Defendant objects to Interrogatory No. 9 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced concurrently herewith for the identity of individuals who attended to, cared for and/or had contact with Decedent. Decedent was a resident of Defendant's facility for over eight (8) months and numerous individuals attended to her during her stay. Should Plaintiff propound a narrowly tailored interrogatory and/or identify those employees she wishes to depose, Defendant will promptly provide additional information and advise as to their employment status.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Defendant further objects to providing any individual's social security number due to privacy and risk of identity theft. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this Response upon receipt. **Second Supplemental Response: 1/13/17** Defendant renews its objection to providing any individual's social security number in written record due to privacy and identity theft risks. Subject to and without waiving this objection, Defendant refers Plaintiff to the medical records and personnel files previously produced and to Defendant's Response to Interrogatory No. 4 above. Additionally, pursuant to the Order of Judge Dickson, Defendant is working to locate current information regarding the employment status, present employment and last known address for the numerous employees and former employees identified in Defendant's Responses, including Response to Interrogatory No. 4 above, and Defendant will supplement this Response with any relevant information as it is obtained. IN further response, Defendant is still in the process of obtaining the personnel file for Dianne Hix and will supplement his Response upon receipt. **Third Supplemental Response 7/3/17:** See Response to Interrogatory No. 8	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #7, 8, 9, and 10. These interrogatories relate to employee, administrators, consultants, and contract workers who had any involvement with the care and treatment of the decedent. The Court orders that the employment status, last known address and present employment be provided for all individuals who had any involvement with the decedent during her residency and that complete employment files be provided for the same. This Order includes, but is not limited to the list of individuals provided by Plaintiff in her Memorandum.	The document referenced in Countrywood's **Third Supplemental Response dated** 7/3/17 was not produced. No employment status information, last known contact information, etc. has been provided for any employees. The Plaintiff remains without information ordered by Judge Dickson. No other supplemen or further informatio has been provided b Countrywood. **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to Countrywood #10	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶9)	Current Status
State the name, most current or last known address, social security number, professional license/registration number, title and dates employed for each individual who reported any accident, injury, or change in condition of Mildred Watkins to her family and/or physician as well as the date, time and method of this notification.	**Original Response:** Defendant objects to Interrogatory No. 10 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant refers Plaintiff to documents produced concurrently herewith for information responsive to Interrogatory No. 10. Defendant reserves the right to supplement its response no Interrogatory No. 10 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Defendant further objects to providing any individual's social security number due to privacy and risk of identity theft. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, produced herewith pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the file for Dianne Hix and will supplement this Response upon receipt. **Second Supplemental Response: 1/13/17** Defendant renews its objection to providing any individual's social security number in the written record due to privacy and identity theft risks. Subject to and without waiving this objection, Defendant refers Plaintiff to the medical records and personnel files previously produced and to Defendant's Response to Interrogatory No. 4 above. Additionally, pursuant to the Order of Judge Dickson, Defendant is working to locate current information regarding the employment status, present employment and last known address for the numerous employees and former employees identified in Defendant's Responses, including Response to Interrogatory No. 4 above, and Defendant will supplement this Response with any relevant information as it is obtained. IN further response, Defendant is still in the process of obtaining the personnel file for Dianne Hix and will supplement his Response upon receipt. **Third Supplemental Response 7/3/17:** See Response to Interrogatory No. 8	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #7, 8, 9, and 10. These interrogatories relate to employee, administrators, consultants, and contract workers who had any involvement with the care and treatment of the decedent. The Court orders that the employment status, last known address and present employment be provided for all individuals who had any involvement with the decedent during her residency and that complete employment files be provided for the same. This Order includes, but is not limited to the list of individuals provided by Plaintiff in her Memorandum.	The document referenced in Countrywood's **Third Supplemental Response dated 7/3/17** was not produced. No employment status information, last known contact information, etc. has been provided for any employees. The Plaintiff remains without information ordered by Judge Dickson. No other supplement or further information has been provided by Countrywood. **RESPONSE REMAIN INCOMPLETE**

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Interrogatory to COUNTRYWOOD #23	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶12)	Current Status
Identify each rule, regulation, guideline, instruction, protocol or other recommendation, manual, handbook, order or notice, or other document which relates to neglect, abuse, restraints, staffing or supervision, policies and procedures, documentation, care plans, hydration, nutrition, dementia care, skin care, medication administration, care of patients with mental conditions, physical therapy, occupational therapy, feeding tubes, catheters, accident prevention, infections and/or infection control at the Defendant's facility which was in effect for Mildred Watkins' residency and any changes since that time.	**Original Response:** Defendant objects to Interrogatory No. 23 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith for information responsive to Interrogatory No. 23. Defendant reserves the right to supplement its Response to Interrogatory No. 23 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see additional Policies and Procedures documents, produced herewith. **Second Supplemental Response:** Subject to and without waiving the foregoing object ions, in addition to the documents previously produced, Defendant refers Plaintiff to select portions of Country Wood's Employee Handbook, produced herewith and marked "Confidential" in accordance with the parties' Consent Protective Order **Third Supplemental Response: 1/13/17:** In addition to the documents previously produced, Defendant refers Plaintiff to Country Wood's Employee Handbook, produced herewith and marked Confidential in accordance with the parties' Consent Protective Order.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #23. This Order includes, but is not limited to the production of any and all manuals, handbooks, policies and procedures, guides, etc., including but not limited to: the Policy and Procedure Manuals for Nursing, Policy and Procedure Manuals for Administration, and Employee Handbook / Manual. The copies should also include title pages, tables of contents, indexes, addendums, etc. for all manuals / handbooks in place for any and all Defendants during the period of Plaintiff's residency.	Excerpts from a Nursing Policy and Procedure Manual were previously produced, along with a 13 page index to the manual. Only a small portion of the Nursing Policy and Procedure Manual was produced. Plaintiff needs the entire manual pursuant to Judge Dickson's Order. Likewise, Plaintiff needs confirmation that the only two manuals in place at the time of Plaintiff's residence were the Nursing Manual and the Employee Manual. Is there no Administration manual? If other manuals existed, they must be produced pursuant to Judge Dickson's Order. No other supplement or informatio has been provided by Countrywood **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to COUNTRYWOOD #30	Countrywood's Original Response: 11/20/2014	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶9)	Current Status
Identify the staffing requirements for the Defendant as understood by the Defendant, at the Defendant's skilled nursing facility whether as mandated by the South Carolina Department of Health and Environmental Control or any other local, state or federal governmental agencies, or by the Defendant's own policies or guidelines, from January 1, 2005 through December 31, 2011, to include staffing categories and number of persons required for each category by shift.	**Original Response:** Defendant objects to Interrogatory No. 30 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Interrogatory No. 30 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waving these objections, Defendant states that it follows the staffing requirement managed by the South Carolina Department of Health and Environmental Control, as revised over time. Defendant reserves the right to supplement its responses to Interrogatory #30 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see Bates-numbered County wood 002057-002059, produced as part of Defendant's original Responses to Plaintiff's First Request for Production, which set forth the staffing requirements as understood by Defendant. **Second Supplemental Response: 1/13/17** Defendant states that this Interrogatory has been fully answered. The staffing requirements requested are equally available to Plaintiff through the SC Department of Health and Environmental Control.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #6 and 30. This request further Orders the Defendant to provide a detailed response to his request and not merely refer the Plaintiff to Bates stamped items 002057-002059, which are not responsive to #30.	The last supplemental response (1/13/17) is not responsive to this request. Referring the Plaintiff to a government agency does not tell the Plaintiff's what the Defendant's understanding of the staffing requirements were at the time of Plaintiff's residence. Judge Dickson repeatedly stated in his Order that an answer which only refers the Plaintiff to a government agency is not sufficient. (See, e.g., ¶22, ¶30) No other supplement or information h been provided by Countrywood. **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to COUNTRYWOOD #47	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶13)	Current Status
Detail your contention of how the Plaintiff sustained the injuries described in the Complaint which ultimately resulted in her death and state specifically and in detail what the claim or contention of the defendant will be regarding any cause or contributing cause of the injuries and ultimate death of the decedent, including a statement in detail of the facts or information upon which this contention is based	**Original Response:** Defendant objects to Interrogatory No.47 to the extent that it calls for an expert medical opinion. Defendant objects to Interrogatory No. 47 on the grounds it seeks disclosure of information privileged and/or protected from disclosure as attorney work product, attorney-client privileged information, and/or information prepared in anticipation of litigation. Subject to and without waiving the foregoing objection, discovery is in the earliest stages and Defendant reserves the right to supplement its Response to Interrogatory No. 47 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Interrogatory as stated in its Original Response above. Subject to and without waiving these objections. Defendant again states that discovery is still ongoing in this matter and does not have any additional discoverable information to disclose at this time. Defendant reserves the right and will supplement this Response in accordance with the South Carolina Rules of Civil Procedure if and when any discoverable information is obtained by Defendant. **Second Supplemental Response 1/13/17:** Defendant has no additional discoverable information to disclose at this time. As discovery is ongoing, Defendant will supplement this Response in accordance with the South Carolina Rules of Civil Procedure if and when any discoverable information is obtained by Defendant.	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #47. Additionally, this Order specifically directs the Defendants to point to specific evidence and provide documentation in support of their allegations that other individuals and/or entities are responsible for the Plaintiff's injuries and death and/or to admit that there are no liable parties to this matter other than those already named in this litigation. Likewise, any and all opinions held by Defendant's expert related to this topic should be disclosed.	Defendant has still failed to answer this interrogatory and has failed to produce evidence in support of their allegations that entities which are not a party are responsible for Plaintiff's injuries and death. Likewise, they have failed to admit that no such evidence exists. This is in violation of Judge Dickson's Order. No other supplement or information has been provided by Countrywood **RESPONSE REMAINS INCOMPLETE**

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Interrogatory to COUNTRYWOOD #53	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶14)	Current Status
Identify each and every employee of Defendant Sterling and Defendant Guardian who worked at Country Wood's facility in Richland County. State the dates said employee worked at Country Wood's facility and the jobs performed.	**Original Response:** Defendant objects to this Interrogatory as exceeding the number of Interrogatories allowed under Rule 33(b)(9) of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, and in a good faith effort to engage in discovery, no employee of Sterling or Guardian worked at the Country Wood facility during Decedent's residency.	NONE	Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #53.	Defendant has still failed to answer this interrogatory in violation of Judge Dickson's Order. No other supplement or information has been provided by Countrywood. **RESPONSE REMAINS INCOMPLETE**

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EXHIBIT 4

RFPD to COUNTRYWOOD #7	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶17)	Current Status
Copy of the complete text, including all endorsements thereto, of any insurance policy which may be applicable to the Plaintiffs' claim.	**Original Response:** Defendant objects to this Request to the extent it calls for a legal conclusion. Defendant further objects on the ground that it seeks information regarding this Defendant's insurer's attitudes towards questions of coverage which is neither relevant nor likely to lead to the discovery of admissible evidence. See Ballard v. Allegheny Airlines, Inc., 54 F.R.D. 67 (E.D. Pa. 1972). Subject to and without waiving these objections, Defendant is not aware of any insurance policies in its name that may be applicable to Plaintiff's claims.	**First Supplemental Response:** Defendant renews each of its objections to this Request as set forth in its Original Response above. Subject to and without waiving these objections, Defendant is not in possession of any other documents responsive to this Request, other than the Certificate of Insurance previously produced. **Second Supplemental Response 1/13/17:** Defendant has produced all responsive documents in its possession and reiterates that for purposes of this claim Defendant is self-insured.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #7. Additionally, this Order specifically directs the Defendants to produce any and all insurance documents, policies, endorsements, declarations pages, etc, which provide coverage of any type to any or all of the defendants, owners, members, shareholders, key employees, etc., including but not limited to Robert Hagan.	Defendant has still failed to answer this Request and has failed to produce any information related to insurance other than one Certificate of Coverage in the amount of $50,000.00. No policies or other documents have been provided for this or any other defendant, or Robert Hagan, as ordered. This is a standard discovery request. Information has been requested for three years and has yet to be received. No other supplement or informatio has been provided by Countrywooc **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #10	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶18)	Current Status
Any and all documents relating to any and all persons or entities with an ownership or control interest; the officers, directors, members, agents or managing employees; the corporation, association, or other company responsible for management of the facility; and the administrator and director of nursing during Mildred Watkins' residency, as required by 42 CFR § 483.75(p), "Disclosure of Ownership." This would include but not be limited to a copy of an organizational chart of the Defendant showing structure, officers, and all inter-company departments and the titles of the heads of each department since January 1, 2005.	**Original Response:** Defendant objects to Request No. 10 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant states that Robert W. Hagan is the sole member and owner of Country Wood Nursing Center, LLC. In further response, Defendant refers Plaintiff to documents produced herewith for information regarding the facility's administrator and director of nursing. Defendant reserves the right to supplement its Response to Request No. 10 in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, all documents identifying Defendant's members may be obtained from the South Carolina Secretary of State. Defendant does not have these documents or any organizational chart in in its possession. However, Defendant refers Plaintiff to its Supplemental Response to Interrogatory No. 17 above for a listing of all department heads at its facility. **Second Supplemental Response 1/13/17:** Defendant does not possess the documents sought by this Request, but reiterates that it has previously provided a list of all department heads at the facility and documentation identifying Defendant's members may be obtained by Plaintiff from the South Carolina Secretary of State.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #10.	Defendant has still failed to respond fully to this Request. Referred the Plaintiff to a governmental agency for information it has readily in its possession is contrary to Judge Dickson's Order. No organizational or management documents have bene provided. Only a list of department heads. This is not responsive to this request. No other supplement or informatio has been provided by Countrywoo **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #17	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶19)	Current Status
All written or electronic documents, including but not limited to salary information, contracts, and personnel files between the Defendant and the persons who served as its qualified dietician and director of food service at Country Wood during the period of Mildred Watkins's residency as required by law. This request seeks not only documents mentioning Mildred Watkins, but personnel file(s) and credentialing information.	**Original Response:** Defendant objects to Request No. 17 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 17 on the ground that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 17 on the grounds it requests confidential information contained in personnel files, which is not automatically discoverable. Subject to and without waiving the foregoing objections, Defendant will produce non-confidential and relevant portions of this individual's personnel file upon the entry of a suitable Protective Order.	**First Supplemental Response:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, see the personnel files of the individuals identified in Defendant's Supplemental Response to Interrogatory No. 4 above, which are being produced pursuant to a Consent Protective Order signed by counsel. Defendant is still in the process of obtaining the personnel file of Dianne Hix and will supplement this Response upon receipt. **Second Supplemental Response 1/13/17:** Defendant refers Plaintiff to the personnel files previously produced and produced herein. In the event additional responsive information is discovered, Defendant will seasonably supplement this Response.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #17. Additionally, Defendants are directed to produce any and all payroll documents for all staff, employees, independent contractors, administrators, owners, executive, etc. along with employee files for these individuals.	Defendant has still failed to respond fully to this Request. No payroll records whatsoever have been provided for any employee, owner, staff, administrators, etc., in violation of Judge Dickson's Order. No other supplement or informatic has been provided by Countrywoo **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #21	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶20)	Current Status
All quality assurance reports, documents, studies, complaints or incident investigation documents, pre-survey documents, survey prep documents, or any other similar documents, written or electronic, relating to Country Wood from January 1, 2005 – present in the possession or control of the Defendant. This would also include and not be limited to any and all internal audits, whether computer audits or otherwise, relating to inspection readiness or preparedness, or in-house facility, visit reports or other documents, whether electronic or paper, regarding any issues. This would include the reports, on each area, as well as quality or assessment indicators used, such as program assessment tools. This includes but is not limited to any and all documents related to the Omnibus Budget Reconciliation Act, 42 CFR § 48375 (o), "Quality Assessment and Assurance."	**Original Response:** Defendant objects to Request No. 21 as overly broad and exceeding the scope of the South Carolina Rules of Civil Procedure, as it seeks information that is not narrowly tailored to the time of the period of events in question. Request No. 21 is also objectionable because it seeks information regarding prior and subsequent events, which are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. S.C. R. Evid. 404(b) & 407.	**First Supplemental Response:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections. Defendant refers Plaintiff to the documents from these agencies that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and documents produced herewith. Defendant does not have any records or similar incidents prior to 2011 in its possession, custody, or control. **Second Supplemental Response 1/13/17:** Defendant refers Plaintiff to the Quality Assurance Meeting Minutes produced by Defendant. In further response, in light of the recent Discovery Oder of judge Dickson, Defendant States that it is in the process of determining whether it may possess any further responsive documentation and will further supplement this Response in the event such documentation is identified.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #21. Defendants are Ordered to provide all documents responsive to this request, including Quality Assessment and Assurance documents, and not merely documents related to similar incidents. Furthermore, directing the Plaintiff to government agencies for this information is not an adequate response.	Defendant has still failed to respond fully to this Request. A number of incident reports and incident tracking logs were produced by Defendant on 7/7/17. However, there are a number of documents missing from the information provided. Additionally, incident reports were only produced for the years 2014-2016. No similar materials were produced for the 2005-2013 timeframe. Likewise, no additional survey documents, audits, etc. from government agencies or otherwise were produced. No other supplement or information has been provided by Defendant. **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #23	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶21)	Current Status
All documents showing the net earnings, gross earnings, expenses, balance sheets, budgets, and all other financial information regarding the Defendant, Defendant Sterling and/or Defendant Guardian from January 1, 2005 – present, including but not limited to all documents of any budget planning and revision which were developed and/or implemented from January 1, 2005 – present. This request specifically includes, but is not limited to, any and all meeting minutes or notes, proposed budgets, amended and/or revised budgets, and other items) which describe how the final approved budget was developed and implemented. Produce any documents pertaining to outside companies, entities, or individuals who have any control or input on budgets and financial decisions and identify said companies and/or individuals.	**Original Response:** Defendant objects to Request No. 23 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 23 on the grounds that it seeks irrelevant; immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 23 to the extent it seeks documents from third parties whom this Defendant does not employ or otherwise control. Defendant objects to producing documents regarding its financial condition, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Said information is also private, confidential, and otherwise subject to protection.	**First Supplemental Response: 1/13/17:** In light of the recent Discovery order of Judge Dickson, Defendant states that it is currently in the process of determining whether it may possess any responsive documentation to this Request, and Defendant will seasonably supplement this Response in the event such documentation is identified.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #23, 24, and 25. In their entirely for of all defendants.	Defendant has still failed to respond fully to this Request. The Plaintiff was provided with several hundred pages of documents in the week preceding the hearing. Many documents have no dates and are merely summaries without critical specific information regarding payments made to and from each Defendant. Some summaries were produced by Countrywood for the years 2008-2016. However, no financial documents were produced whatsoever other than the tax return of Guardian for 2011 and 2015; the tax return of Sterling for 2006; and a tax return for Ridgewood Nursing Center, who is not a present party to this action, which listed the address of Country Wood is not a party to this action, for 2013. These failures to produce full and complete information are clear violations of Judge Dickson's Order. No other supplement or informatio has been provided by Countrywooc **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #24 and #25	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶21)	Current Status
All documents showing payment of any kind made by this Defendant to any co-defendant from 2005 to the present and all documents identifying the basis for such payment, including but not limited to contracts, agreements, etc.	**Original Response:** Defendant objects to Request No. 24 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 24 on the grounds that it seeks irrelevant; immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 24 to the extent it seeks documents from third parties whom this Defendant does not employ or otherwise control. Defendant objects to producing documents regarding its financial condition, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Said information is also private, confidential, and otherwise subject to protection.	**First Supplemental Response:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant has no documents responsive to this request. **Second Supplemental Response: 1/13/17:** Defendant has no documents responsive to this request.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #23, 24, and 25. In their entirely for of all defendants.	Defendant has still failed to respond to this Request. By its own admission, Guardian was contracted to provide administrative services to Countrywood. Likewise, according to documents produced to date, at a minimum, all new hires were screened and approved by Sterling. It is not likely that these companies work for free. To suggest that there is no record of payments between these Defendants in light of the "consulting agreements" produced, is simply not plausible. The failure to produce full and complete information is a clear violations of Judge Dickson's Order. No other supplement or information has been provided by Countrywood **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #27	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶22)	Current Status
Any and all incident/accident reports, unusual occurrence reports, or variance reports made to any federal, state or local government agency and/or any licensing authority or board pertaining to any incidents involving alleged neglect, abuse, staffing or supervision, policies and procedures, restraints, documentation care plans, hydration nutrition, dementia care, skin care, medication administration, care of patients with mental conditions, physical therapy, occupational therapy, feeding tubes, or the appropriateness of admitting and retaining demented and ambulatory residents' infections and/or infection control, at Country Wood and any of the Defendant's other facilities from January 1, 2005 – present, made in compliance with 42 CFR § 483.13(c)(4) and with the South Carolina Department of Health and Environmental Control, Regulation 61-17, Standards for Licensing Nursing Homes, Section B(7).	Defendant objects to Request No. 27 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 27 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Specifically, Request No. 27 is not narrowly tailored to the period of the time or events in question and seeks information regarding residents other than Decedent and facilities other than the one at issue in this action. Such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Request No. 27 also seeks information regarding prior and subsequent events which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Evidence as to what may have occurred between one party and a third party with reference to a thoroughly distinct incident is irrelevant, not probative, and merely prejudicial.	**First Supplemental Response:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant refers Plaintiff to the documents that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and additional documents produced herewith. Defendant does not have any records or similar incidents prior to 2011 in its possession, custody, or control. **Second Supplemental Response 1/13/17:** Defendant refers Plaintiff to the responsive documents Defendant produced in its First and Supplemental Responses to Plaintiff's Request for Production. In light of the recent Discovery Oder of judge Dickson, Defendant States that it is in the process of identifying and collecting additional responsive documentation to this Request, but as such documentation is neither narrowly tailored as to time or facility, Defendant requires additional tie to locate, review, and produce the requested information. Defendant will timely supplement this response as such documentation is located. **Third Supplemental Response: 7/6/17:** Defendant refers Plaintiff to the responsive document produced herewith.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #27 in its entirety for all Defendants. It is further Ordered that a reference to government agencies is not a sufficient response, nor is a response only providing "similar incidents".	Defendant has still failed to respond fully to this Request. A number of incident reports and incident tracking logs were produced by Defendant on 7/7/17. However, there are a number of documents missing from the information provided. Additionally, incident reports were only produced for the years 2014-2016. No similar materials were produced for the 2005-2013 timeframe. Likewise, no additional survey documents, audits, etc. from government agencies or otherwise were produced. Furthermore, no documents whatsoever were produced related to other facilities owned by Defendant, as Ordered by Judge Dickson. No other supplement or information has been provide by Countrywood. **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #33	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶23)	Current Status
All planned, budgeted or projected staffing schedules and/or assignments for personnel at Country Wood from January 1, 2005 – present, including, but not limited to, all monthly staff schedules for nurses, certified assistants, medication aides, or orderlies.	Defendant objects to Request No. 33 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Subject to and without waiving the foregoing objection, Defendant does not currently possess documents responsive to Request No. 33, but reserves the right to supplement and amend its response to Request No. 33 in accordance with the South Carolina Rules of Civil Procedure should it discover	**First Supplemental Response:** Defendant renews its objections to this Request as state in its Original Response above. Subject to and without waiving these objections, Defendant states again that it is not in possession of documents responsive to this Request. Should Defendant discovery responsive documents, it will further supplement its response to this Request as required under the South Carolina Rules of Civil Procedure. **Second Supplemental Response 1/13/17:** Defendant states that it is not in possession of documents responsive to this Request. In light of the recent Discovery Order of Judge Dickson, Defendant is now working to determine whether any such documents were ever created and defendant will seasonably supplement this Response with that information upon determining the answer to the same **Third Supplemental Response: 7/3/17** Defendant refers Plaintiff to the attached staffing schedules for April through June 2011 and January 2013 through December 2014.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #33 in its entirety for all Defendants. If there are no documents responsive to this request, it is hereby Ordered that the Defendants indicate whether such documents were ever created by Defendants and/or if such documents were created but have since been lost or destroyed by the Defendants.	Defendant has still failed to respond fully to this Request. The staffing schedules produced do not cover the time frame ordered by Judge Dickson and do not even cover the complete period of Plaintiff's residency. Multiple documents are missing or are without dates. Likewise, the schedules are filled in with letters which are meaningless without a code or key to decipher them. No such key was provided by Defendants. No other supplement or informatio has been provided by Countrywoo **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #39	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶24)	Current Status
COUNTRYWOOD: Any and all policies and procedures in effect during Mildred Watkins' stay regarding: a. identification of abuse and neglect of resident; b. any and all courses attended and/or completed by the Administrator(s) of the facility; c. administration and/or monitoring of medications; d. training of all direct care staff; e. training specifically provided to nursing assistants or nurses' aides; f. orientation program for new employees; g. nutrition/hydration and nutritional supplements; h. dementia care; i. communication with families and physicians; j. quality assurance; k. staffing or supervision; l. policies and procedures; m. documentation; n. care plans; o. dementia care; p. skin care; . . . . (Lengthy request – remainder of request omitted for sake of brevity)	Defendant objects to Request No. 39 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 39 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant objects to Request No. 39 to the extent it seeks documents concerning subsequent remedial measures, which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. S.C. R. Evid. 407. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith.	**First Supplemental Response:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, see additional Policies and Procedures documents, produced herewith. **Second Supplemental Response:** Subject to and without waiving the foregoing objections, in addition to the documents previously produced, Defendant refers Plaintiff to selected portions of the Employee handbook, produced herewith. **Third Supplemental Response 1/13/17:** Defendant refers Plaintiff to the policies and procedures documents it produced in its original response and first and second supplemental responses to this request for Production. In light of the recent Discovery Order of Judge Dickson, Defendant is working to determine whether any additional responsive policy and procedure documents exist, and in the event any additional documents are identified in Defendant's ongoing subsequent search, Defendant will seasonably supplement this response.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #39 in its entirety for all Defendants. This Order includes, but is not limited to the production of a complete copy of all handbooks, manuals, policy and procedure guides, including but not limited to those for employee, Nursing and Administration. Defendants are directed to produce full and complete copies of all manuals, handbooks, etc, including title pages, tables of contents, indexes, addendums, etc in place during the period of decedent's residency.	Defendant has still failed to respond fully to this Request. Portions of a Nursing Policy Manual were previously produced, but Plaintiff have never been provided with the entire manual, which must be sizable, the index alone produced is 13 pages long. Plaintiff has only been provided with a few excepts, selected by Defendant, and has not supplemented this response following Judge Dickson's Order to comply with the Order. Likewise, only an employee handbook has been produced, pursuant to Judge's Order. The original handbook produced had numerous redacted pages which were ordered produced by Judge Dickson. No policies regarding Administration or management have been produced. No other supplement or information has been provided b Countrywood. **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #43	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶25)	Current Status
A copy of any and all depositions given by any officer, agent, and/or employee of the Defendant for the last 10 years in the possession or control of the Defendant, Defendant's counsel, or Defendant's agents and/or employees. If depositions have been given by these individuals which are not currently in the possession or control of the Defendant or Defendant's counsel for this case, provide the identity of attorney or other individual or entity who would have possession or control of the same.	Defendant objects to Request No. 43 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 44 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant further objects to Request No. 44 to the extent it seeks information regarding "prior bad acts," which is neither relevant nor reasonably calculated to lead to the discovery of evidence that would be admissible at trial. S.C. R. Evid. 404(b).	**First Supplemental Response:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to und without waiving these objections, Defendant further clarifies that this Request is overly broad because it does not limit the scope of the topics for which she has requested deposition testimony. Defendant will consider supplementing upon receipt or a narrowly tailored Request from Plaintiff. **Second Supplemental Response 1/13/17:** In light of the recent Discovery Order of Judge Dickson, Defendant is now in the process of identifying and collecting responsive documentation to this Request, but as such documentation is neither narrowly tailored as to time or facility, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this Response as such documentation is located. **Third Supplemental Response7/5/17:** Defendant possesses no documents responsive to this request.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #43 in its entirety for all Defendants.	Defendant has still failed to respond to this Request and has not produced a single document ordered by the Court. The owners and managers of the Defendant companies, particularly Robert Hagan, have been sued and/or have been witnesses in litigation in numerous actions in several states. A cursory search will reveal these suits and reflect that depositions were taken of these officers, agents and employees in numerous cases. Defendant's last response shows a complete lack of any effort to obtain documents which should be readily available to them. This violates Judge Dickson's Order. No other supplement or information has been provided by Defendant. **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #44	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶26)	Current Status
A copy of any and all depositions given by any expert witness identified by the Defendant as well as a copy of any written report ever prepared by any expert witness.	Defendant objects to Request No. 44 to the extent it calls for documents prepared by an expert witness who is not expected to testify at the trial of this case, which is not discoverable except upon a showing of exceptional circumstances. S.C. R. Civ. P. 26(b)(4)(B). Defendant further objects to this Request to the extent it seeks draft versions of expert report, as such a request imposes a burden on this defendant beyond that required by the South Carolina Rules of Civil Procedure. Subject to and without waiving these objections, at this time, Defendant has not yet identified any expert witnesses expected to testify at trial. Defendant reserves the right to supplement and amend its Response in accordance with the South Carolina Rules of Civil Procedure.	**First Supplemental Response 1/13/17:** Defendant has not yet identified any expert witnesses expected to testify at trial. Defendant reserves the right to supplement and/or amend its Response to this Request in accordance with the South Carolina Rules of Civil Procedure.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #44 in its entirety for all Defendants. If Defendants asset that their expert is not in possession of such depositions, the expert is Ordered to provide the name and addresses and case names of counsel in possession of the same.	Despite having disclosed an expert, Defendant has provided no documents or information in response to this request, in violation of Judge Dickson's Order. Certainly Defendant's expert is aware of occasions when he has provided deposition testimony and would be able to provide that information to Defendants. Likewise, any written report by Defendant is discoverable and should be produced. No other supplement or information has been provided by Countrywood **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #56	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶27)	Current Status
If the Defendant has been issued a deficiency, license violation, penalty or validated complaint finding within the last five (5) years by the U.S. Department of Justice, the South Carolina Department of Health and Environmental Control and/or the South Carolina Long Term Care Ombudsman for any reason, including but not limited to: (lengthy request – complete content omitted)	Defendant objects to Request No. 56 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 56 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial.	**First Supplemental Response** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant refers Plaintiff to the documents from these agencies that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and additional documents produced herewith. Defendant does not have any records or similar incidents prior to 2011 in its possession, custody or control. **Second Supplemental Response 1/13/17:** In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of determining whether any additional responsive documentation to this Request exists, but as such documentation is not tailored to similar incident, Defendant requires additional time to locate, review, and produce the requested information. Defendant will timely supplement this response in the event responsive documentation is located. **Third Supplemental Response 7/5/17:** For additional information responsive to Request No. 56, Defendant refers Plaintiff to Response for Request for Production No. 43.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #56 in its entirety for all Defendants. References to documents obtained independently by the Plaintiff are an insufficient response to this request. Likewise, documents only related to "similar incidents" are not a sufficient response to this request. All documents responsive to this request must be produced.	In Defendant's last response of 7/5/17, Defendant refers Plaintiff to the response to RFPD #43. However, #43 relates to deposition testimony of officers, employees, and agents. #43 does not relate to violations, deficiencies, or complaints by government agencies. Likewise, Defendant failed to produce any documents in response to #43. No response has been provided to this request, in violation of Judge Dickson's Order. No other supplement or information has been provided by Countrywood. **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #57	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶28)	Current Status
All documents relating to any inspection/survey undertaken by the South Carolina Department of Health and Environmental Control's survey which occurred during Mildred Watkins' residency finding that Defendant; a. failed to hire only people who have no legal history of abusing, neglecting or mistreating residents; or report and investigate any acts or reports of abuse, neglect or mistreatment of residents; b. failed to give each resident a special diet to help when there is a nutritional problem; c. failed to give professional services that meet a professional standard of quality; d. failed to make sure each resident is being watched and has assistance devices when needed, to prevent accidents; e. failed to make sure that residents with reduced range of motion get proper treatment and services to increase range of motion; f. failed to properly care for residents needing special services; g. failed to provide food in a way that meets a resident's needs; store cook, and give out food in a safe and clean way; h. failed to make sure that residents who take drugs are not given too many doses or for too long or given inappropriate medications or overuse of medications; i. failed to make sure that the use of drugs is carefully watched; or stop or change drugs that cause unwanted effects; j. failed to keep the rate of medication errors (wrong drug, wrong dose, wrong time) to less than 5%; and k. failed to provide needed housekeeping and maintenance; or any plans of correction or follow-up surveys relating to the same.	Defendant objects to Request No. 57 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 57 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Defendant objects to Request No. 57 on the grounds that it seeks private medical information regarding other residents of Country Wood, which is protected from disclosure by HIPAA. Defendant further objects to Request No. 57 on the grounds that it seeks information regarding prior and subsequent events, which are neither relevant nor likely to lead to the discovery of evidence that would be admissible at trial. Evidence as to what may occurred between one party and a third party with reference to a thoroughly distinct incident is irrelevant. Information sought regarding prior and subsequent events that are totally unrelated to the subject matter of this lawsuit is not probative, but merely prejudicial. Furthermore, any such information is publicly available and is, therefore, equally available to Plaintiff	**First Supplemental Response** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant refers Plaintiff to the documents from these agencies that she has produced to Defendant as part of her responses to Defendant's First Requests for Production to Plaintiff and additional documents produced herewith. **Second Supplemental Response 1/13/17:** Defendant renews its objection to Request No. 57 on the grounds that it seeks private medical information regarding other residents of Countrywood, which is protected from disclosure from HIPAA. In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of determining whether any additional responsive documentation to this Request exists, and in the event responsive documentation is located, Defendant will seasonably produce the same.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #57 in its entirety for all Defendants. References to documents obtained independently by the Plaintiff and documents only related to "similar incidents" are an insufficient response to this request. All documents responsive to this request must be produced.	No response has been provided to this request, in violation of Judge Dickson's Order. Likewise, it is unlikely that this request is not being answered due to HIPAA and patient confidentiality concerns, as in the documents produced by Defendant the week before this hearing, the names of patients and personal information were on most of the documents provided. Furthermore, Plaintiff previously agreed at the Motion to Compel hearing to allow the redaction of patient names. No other supplement or information has been provided by Countrywoo **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #66	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶29)	Current Status
Corporate tax returns for the years 2005-present.	Defendant objects to this Request as overly broad, as it seeks information that is not narrowly tailored to the period of the time of events in question. Defendant further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant's corporate tax returns are only relevant to Plaintiff's claims for punitive damages, and, at this time, Plaintiff has not produced any affidavit, discovery responses, or other evidence sufficient to show that she has an evidentiary basis supporting her punitive damages claim.	**First Supplemental Response 1/13/17:** In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to the same as soon as such information is located. **Third Supplemental Response 7/5/17:** Defendant refers Plaintiff to Country Wood's financial documents produced herewith.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #66, 67, 68, and 69 in its entirety for all Defendants from 2005-present.	Defendant has provided the tax returns for Countrywood for the years: 2007, 2008, 2009, 2011, 2012, and 2016. Still missing are the years: 2005, 2006, 2010, 2013, and 2014. No further response has been provided to this request, in violation of Judge Dickson's Order. No other supplement or information has been provided by Countrywood. **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #67	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶29)	Current Status
Corporate financial statements for the years 2005-present. This includes, but is not limited to: income statements, balance sheets, statement of cash flow and audited financial statements.	Defendant objects to this Request as overly broad, as it seeks information that is not narrowly tailored to the period of the time of events in question. Defendant further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Defendant's financial information is only relevant to Plaintiff's claims for punitive damages, and, at this time, Plaintiff has not produced any affidavit, discovery responses, or other evidence sufficient to show that she has an evidentiary basis supporting her punitive damages claim.	**First Supplemental Response 1/13/17:** In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to the same as soon as such information is located. **Third Supplemental Response 7/5/17:** Defendant refers Plaintiff to Country Wood's Budgets for 2008-2016, produced herewith. Defendant refers Plaintiff to Countrywood's Income Statement/Summaries form 2008-2016, produced herewith.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #66, 67, 68, and 69 in its entirety for all Defendants from 2005-present.	Defendant has provided Budget Reports for 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016 Defendant has produced Income Summary Reports for the years: 2008, 2009, 2010, 2011, 2012, 2013. Defendant has produced Monthly Trend Reports for the following years: 2014, 2015, 2016. Budget reports still missing are the years: 2005, 2006, and 2007. Likewise, the are only summaries and provide no details regarding specific payment, including but not limited to payroll and payments to/from co-Defendants. These documents were ordered to be produced by Judge Dickson. (See ¶19, etc.) Income Summary Reports are still missing for the years: 2005, 2006, 2007, 2014, 2015, and 2016. summaries and provide no details regarding specific payment, including but not limited to payroll and payments to/from co-Defendants. These documents were ordered to be produced by Judge Dickson. (See ¶19, etc.) Monthly Trend Reports are still missing for the years: 2005-, 2006, 2007, 2008, 2009, 2010, 2011, and 2013. summaries and provide no details regarding specific payment, including but not limited to payroll and payments to/from co-Defendants. These documents were ordered to be produced by Judge Dickson. (See ¶19, etc.) Defendant also produced an undated and untitled financial summary type document for which Plaintiff was provided no identifying information. (Bates # 009649-9657) No further response has been provided to this request, in violation of Judge Dickson's Order. No other supplement or information has been provided by Countrywo **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #68	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶29)	Current Status
Documents which reflect the ownership and value of the property occupied by Country Wood Nursing Care Center.	Defendant objects to this Request on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of evidence which will be admissible at trial. This Request is relevant only in the event that Plaintiff obtains a judgment against any or Defendants and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C.R.C.P 69. Thus, this request is premature and irrelevant to any of Plaintiff's claims in this action.	**First Supplemental Response 1/13/17:** In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to the same as soon as such information is located. **Third Supplemental Response 7/5/17:** The owner of the property occupied by Defendant Country wood is Ridgewood nursing Center, LLC. Ridgewood Nursing Center LLC has never had an appraisal done. Typically, nursing homes are valued on the price a seller can get for the beds, but there has been no attempt to sell this facility, its present value is unknown.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #66, 67, 68, and 69 in its entirety for all Defendants from 2005-present.	Defendant has provided a tax return of Ridgewood Nursing Center, LLC for the year 2013. No other information responsive to this request has been produced. No further response has been provided to this request, in violation of Judge Dickson's Order. No other supplement or information has been provided by Defendant. **RESPONSE REMAINS INCOMPLET**

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RFPD to COUNTRYWOOD #69	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶29)	Current Status
Documents which list and value the assets of Defendant County Wood. Include in such documents any liens or mortgages placed on those assets and identify the holder and the amounts of any such lien.	Defendant objects to this Request on the grounds that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of evidence which will be admissible at trial. This Request is relevant only in the event that Plaintiff obtains a judgment against any or Defendants and such judgment is not paid. Under such circumstances, Plaintiff may pursue post-judgment discovery under S.C.R.C.P 69. Thus, this request is premature and irrelevant to any of Plaintiff's claims in this action.	**First Supplemental Response 1/13/17:** In light of the recent Discovery Order of Judge Dickson, Defendant is in the process of collecting information responsive to this request and will fully respond to the same as soon as such information is located. **Third Supplemental Response 7/5/17:** Defendant refers Plaintiff to its response to Request for Production No. 68 for information responsive to this Request. Nursing homes are valued on the price a seller can get for the beds in a facility. Defendant CountyWood has 26 Assisted Living Facility beds and 38 skilled nursing facility beds.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #66, 67, 68, and 69 in its entirety for all Defendants from 2005-present.	Defendant has directed Plaintiff to the response to #68, which provided a tax return of Ridgewood Nursing Center, LLC for the year 2013. That response is inappropriate for this request as Ridgewood Nursing Center, LLC is not owned by Country Wood, and thus, would not be an asset of Defendant. No information responsive to this request has been produced. No further response has been provided to this request, in violation of Judge Dickson's Order. No other supplement or information has been provided by Defendant. **RESPONSE REMAINS INCOMPLETE**

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RFPD to COUNTRYWOOD #71	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (¶30)	Current Status
All documents which define, delineate or explain in any way the relationship, duties and responsibilities between you and any co-defendants in this matter. This request includes, but is not limited to contracts, lease agreements, consulting agreements, letters, emails, facsimiles, texts, memoranda, notes, recordings, bills, etc.	Defendant objects to Request No. 71 on the ground that it is vague, overly broad, unduly burdensome, and oppressive and thereby exceeds the scope of the South Carolina Rules of Civil Procedure. Defendant objects to Request No. 71 on the grounds that it seeks irrelevant, immaterial information that is not likely to lead to the discovery of admissible evidence at trial. Subject to and without waiving the foregoing objections, Defendant refers Plaintiff to documents produced herewith.	**First Supplemental Response 1/13/17:** Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant is not in possession of any documents responsive to this Request other than those previously produced. Defendant's corporate organizational documents are equally available to Plaintiff through a request to the South Carolina Secretary of State's office. **Second Supplemental Request:** Defendant has produced all documents in its possession responsive to the Request. Defendant refers Plaintiff to its Second Supplemental Response to Request No. 10 for further information responsive to this request.	Defendant Countrywood is hereby Ordered to completely and fully respond to Request for Production #71 in its entirety for all Defendants from 2005-present. An answer directing the Plaintiff to the Secretary of State's office or other government agency is not a sufficient response. All documents should be produced in their entirety.	Defendant has directed Plaintiff to its Second Supplemental Responses to RFPD, which do not provide a response to No. 10. The only document produced to date regarding the relationship between the co-defendants is one contract for Guardian dated 2011and one contract for Sterling dated 2007. Plaintiff also has a one page Articles of Incorporation for Guardian and Sterling. No other documents responsive to this request have been produced, despite the specific information requested and the Order of Judge Dickson. No further response has been provided to this request, in violation of Judge Dickson's Order. No other supplement or information has been provic by Defendant. RESPONSE REMAINS INCOMPLETE

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