

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

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Case No. 2016-CP-40-04463

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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.

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RECORD ON APPEAL

VOLUME III

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# **EXHIBIT 5**

Interrogatory to STERLING #3	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶32)	Current Status
<p>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</p>	<p><b>Original Response:</b> 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.</p>	<p><b>First Supplemental Response: 1/13/17:</b> Defendant refers Plaintiff to its original response to Interrogatory 3, which Defendant states is the full and complete response to same.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #3 in its entirety.</p>	<p>Defendant has still failed to answer this interrogatory, despite the Order of Judge Dickson.</p> <p>According to government sources, Sterling is still doing business, and business on behalf of Countrywood. Government sources also reflect that Defendant Sterling has officers other than Robert Hagan. Defendant has failed to answer this Interrogatory.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #4	Sterling's Original Response:	Sterling's Supplemental Responses:	Judge Dickson's ORDER (¶33)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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. <i>Ballard v. Allegheny Airlines Inc.</i>, 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.</p>	<p><b>1<sup>st</sup> Supplemental Response:</b> 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 Certificates of Insurance for policies in place during Decedent's residency at Defendant County Wood's facility and will supplement this response upon receipt.</p> <p><b>Second Supplemental Response:</b> 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.</p> <p><b>Third Supplemental Response</b> 7/8/17: None.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #4. 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.</p>	<p>No insurance information has been produced by Sterling. In the 7/5/17 response, they now indicate that Sterling has no insurance.</p> <p>Likewise, no insurance information has been produced related to Robert Hagan, owner of all defendant companies, despite Judge Dickson's Order.</p> <p>No other supplement or insurance information has been provided for Sterling.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #5	Sterling's Original Response:	Sterling's Supplemental Responses:	Judge Dickson's ORDER (¶34)	Current Status
<p>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</p>	<p><b>Original Response:</b> Defendant objects to the 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 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.</p>	<p><b>First Supplemental Response:</b> Defendant renews its objections to this interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see Defendant Country Wood's Supplemental response to Interrogatory #3 served simultaneously herewith.</p> <p><b>CW's Second Supplemental Response to INT. #3 states:</b> 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.</p>	<p>Defendant 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 injuries and Death and/or to admit that there are liable parties to this matter other than those already named in this litigation.</p>	<p>No additional response received from Sterling, de Judge Dickson's Order.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #6	Sterling's Original Response: 11/14/2014	Sterling's Supplemental Responses:	Judge Dickson's ORDER (#35)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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. 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 Sterling ceased doing business prior to decedent's residency at Defendant Country Wood's facility and does not possess information responsive to Interrogatory 36.</p>	<p><b>1<sup>st</sup> Supplemental Response:</b> 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.</p>	<p>Defendant Sterling 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.</p>	<p><b>Second Supplemental Response: 1/13/17</b> Defendant has no information responsive to this Interrogatory.</p> <p><b>It is remarkable that Sterling is unaware of any witness whatsoever to a fact in this case when they hired the employees.</b></p> <p>No other supplement or insurance information has been provided for Sterling.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to Sterling #8	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶36)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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 #8.</p>	<p><b>First Supplemental Response: 5/18/15</b> Defendant renews its objections to this Interrogatory as stated 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 the employment, staffing, or hiring decisions at Defendant County Wood's facility. 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 County Woods' facility and will supplement this Response upon receipt.</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant does not possess information responsive to Interrogatory #8.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #8 in its entirety. The Order includes, but is not limited to the production of all payroll records for all individuals working at Country Wood during the period of Plaintiff's residency.</p>	<p>No other supplement has been provided by Sterling. No payroll information for the individuals who rendered care to the Plaintiff have been produced. This was promised in May 2015, over 2 years ago.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #9	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (§37)	Current Status
<p>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.</p>	<p><b>Original Response:</b>  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 #9</p>	<p><b>First Supplemental Response:</b>  Defendant has not information responsive to this request.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #9 in its entirety. 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.</p>	<p>No other supplement or further information has been provided by Sterling.  The Plaintiff remains without information ordered by Judge Dickson.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #12	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶38)	Current Status
<p>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.</p>	<p><b>Original Response:</b> Defendant Sterling ceased doing business prior to Decedent's residency at Defendant County Wood's facility; therefore, it has no documents responsive to this Interrogatory.</p>	<p><b>First Supplemental Response 5/18/15:</b> Defendant further states that it did not provide medical or skilled nursing services to Defendant 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.</p> <p><b>Second Supplemental Response: 1/13/17</b> Defendant has no information responsive to this Interrogatory</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #12, 14, 15, 28, 42, 48, and 49 in their entirety.</p>	<p>No employment status information, last known contact information, etc. has been provided for any employees. Sterling was directly involved with hiring of employees according to records previously produced. Thus, they should be in possession of this information.</p> <p>The Plaintiff remains without information ordered by Judge Dickson.</p> <p>No other supplement or further information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #14	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶38)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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.</p>	<p><b>First Supplemental Response:</b> 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.</p> <p><b>Second Supplemental Response: 1/13/17:</b> In light of the recent discovery Order of Judge Dickson, Defendant is in the process of identifying and collecting responsive documents 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.</p> <p><b>Third Supplemental Response: 7/5/17:</b> Upon information and belief, none.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #12, 14, 15, 28, 42, 48, and 49 in their entirety.</p>	<p>Defendant has still failed to answer this interrogatory, despite the Order of Judge Dickson.</p> <p>Likewise, Defendant apparently made little to no effort to research this issue, as a cursory search of litigation involving Defendant Sterling revealed several cases in the 10 year period, including cases pending in Georgia, Delaware, and Florida. Interestingly, the Delaware case reveals that Defendant Sterling was sanctioned by the Court for failing to comply with discovery.</p> <p>The Plaintiff should not be required search every court in every state for documents responsive to this request. This matter was addressed by Judge Dickson and Defendant was ordered to produce this information and has repeatedly failed to do so.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #15	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶38)	Current Status
<p>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.</p>	<p><b>Original Response:</b>  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 waiver of 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.</p>	<p><b>First Supplemental Response:</b>  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 to 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.</p> <p><b>Second Supplemental Response: 1/13/17:</b>  Defendant has no information responsive to this Interrogatory.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #12, 14, 15, 28, 42, 48, and 49 in their entirety.</p>	<p>Defendant has still failed to answer this interrogatory, despite the Order of Judge Dickson.</p> <p>Defendant Sterling is noted on multiple government documents, including recent ones, as being the operator of the Countrywood facility.</p> <p>Defendant should be aware of and in possession or control of this information.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #28	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (#38)	Current Status
<p>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.</p>	<p><b>Original Response:</b>  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.</p>	<p><b>First Supplemental Response 1/13/17:</b>  Defendant has no information responsive to this Request.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #12, 14, 15, 28, 42, 48, and 49 in their entirety.</p>	<p>Defendant has still failed to answer this interrogatory, despite the Order of Judge Dickson.</p> <p>Defendant should be aware of and possession or control of this information.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to STERLING #49	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (#38)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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.</p>	<p><b>First Supplemental Response: 1/13/17:</b> 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.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Interrogatory #12, 14, 15, 28, 42, 48, and 49 in their entirety.</p>	<p>Defendant has still failed to answer this interrogatory, despite the Order of Judge Dickson.</p> <p>No other supplement or information has been provided by Sterling.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

# **EXHIBIT 6**

RFPD to STERLING #2	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶41)	Current Status
<p>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.</p>	<p>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.</p>	<p><b>First Supplemental Response</b> 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.</p> <p><b>Second Supplemental Request 1/13/17:</b> Defendant has no information responsive to this request.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Request for Production #2, 3, 5, and 6 in their entirety.</p>	<p>The only documents produced to date regarding the relationship between the co-defendants is one contract for Guardian dated 2011 and 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.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #7	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶42)	Current Status
<p>Copy of the complete text, including all endorsements thereto, of any insurance policy which may be applicable to the Plaintiffs' claim.</p>	<p><b>Original Response:</b> 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 <i>Ballard v. Allegheny Airlines, Inc.</i>, 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 Plaintiffs claims.</p>	<p><b>First Supplemental Response:</b> 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.</p> <p><b>Second Supplemental Response 1/13/17:</b> 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.</p>	<p>Defendant Sterling 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.</p>	<p>Defendant has still failed to answer this Request and has failed to produce any information related to insurance covering Sterling and/or Robert Hagan.</p> <p>This is a standard discovery request. Information has been requested for three years and has yet to be received.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #17	Countrywood's Original Response:	Countrywood's Supplemental Response	Judge Dickson's ORDER (§19)	Current Status
<p>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.</p>	<p><b>Original Response:</b>  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 County 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 County Wood's facility.</p>	<p><b>First Supplemental Response:</b>  Defendant renews its objections to this Request as stated in its Original Response above. Subject to and without waiving these objections, Defendant does not have any responsive documents.</p> <p><b>Second Supplemental Response 1/13/17:</b>  Defendant has no information responsive to this Request.</p>	<p>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.</p>	<p>Defendant has still failed to respond fully to this Request. No payroll records, salary information, etc. whatsoever have been provided for any employee, owner, staff, administrators, etc., in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #18	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
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.	See Defendant's Objections and Response to Request for Production No. 17.	<p><b>First Supplemental Response:</b> See Defendant's Supplemental Response to Request for Production No. 17</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant has no information responsive to this Request.</p>	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	<p>Defendant has responded by referring Plaintiff to another incomplete response, #17. Defendant has still failed to respond fully to this Request.</p> <p>No payroll records, salary information, etc. whatsoever have been provided for any employee, owner, staff, administrators, etc., in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #24	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>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.</p>	<p><b>Original Response:</b>  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.</p>	<p><b>First Supplemental Response: 1/13/17:</b>  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.</p> <p><b>Second Supplemental Response 7/3/17:</b>  Defendant directs Plaintiff to Sterling Healthcare's financial documents, produced herewith.</p>	<p>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.</p>	<p>Defendant has still failed to respond fully to this Request.</p> <p>This week, Plaintiff was provided with one tax return for Defendant Sterling from 2006. Not a single other document responsive to this request was produced related to Sterling.</p> <p>The Plaintiff was provided with several hundred pages of documents in the week preceding the hearing related to Countrywood. 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.</p> <p>Likewise, 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.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #25	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (#43)	Current Status
<p>All documents showing payment of any kind made by and/or to 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.</p>	<p><b>Original Response:</b> 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 the 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 [sic] Defendant Country Wood produced herewith. Defendant and undersigned counsel will consider supplementing this Response upon clarification and receipt of additional information from Plaintiff.</p>	<p><b>First Supplemental Response:</b> Defendant renews its objections to this Request as stated 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.</p> <p><b>Second Supplemental Response: 1/13/17:</b> Defendant does not possess any document responsive to this request.</p>	<p>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</p>	<p>Defendant has still failed to respond to this Request.</p> <p>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 unlikely these companies worked 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.</p> <p>The failure to produce full and complete information is a clear violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #26 and 27	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>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) and with the South Carolina Department of Health and Environmental Control, Regulation 61-17, Standards for Licensing Nursing Homes, Section B(7).</p> <p>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</p>	<p>26. 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.</p> <p>27. 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. Subject to and without waiving the foregoing objection, Defendant ceased doing business prior to decedent's residency at Defendant County</p>	<p><b>First Supplemental Response:</b></p> <p>26. 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.</p>	<p>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</p>	<p>Defendant has still failed to respond fully to this Request.</p> <p>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.</p> <p>Likewise, no additional survey documents, audits, etc. from government agencies or otherwise were produced.</p> <p>Furthermore, no documents whatsoever were produced related to other facilities owned by Defendant, as Ordered by Judge Dickson.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

<p>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).</p>	<p>wood's facility. Furthermore, Defendant did not provide medical or skilled nursing services to decedent and otherwise was not responsible for the employment, hiring and staffing and Defendant County Wood's facility. Defendant did not employ individuals working at Defendant County Wood's facility. Defendant does not have document responsive to this request.</p>			
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RFPD to STERLING #34	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>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.</p>	<p>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.</p>	<p><b>First Supplemental Response:</b> 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.</p>	<p>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</p>	<p>Missing May 2011 Nursing Assignments.</p> <p>Also missing payroll records for these employees to confirm actual hours worked.</p> <p>Response does not comply with Judge Dickson's Order.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #35	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
Copies of any and all documents regarding nursing hours per resident per day during Mildred Watkin's residency.	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.	<p><b>First Supplemental Response:</b> 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.</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant has no information responsive to this Request.</p>	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	<p>Missing May 2011 Nursing Assignments.</p> <p>Also missing payroll records for the employees to confirm actual hours worked.</p> <p>Response does not comply with Judge Dickson's Order.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #44	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>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, 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.</p>	<p>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).</p>	<p><b>First Supplemental Response:</b> 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.</p> <p><b>Second Supplemental Response 1/13/17:</b> 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.</p> <p><b>Third Supplemental Response 7/5/17:</b> Defendant possesses no documents responsive to this request.</p>	<p>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</p>	<p>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.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #67	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>Corporate tax returns for the years 2005-present.</p>	<p>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 CountyWood, and this Defendant has produced document demonstrating that it does or did not provide such services to any resident of Defendant County Wood's facility, including Decedent. Defendant further objects to this request as overbroad, as it seeks information not narrowly tailored to the period of time of events in question.</p>	<p><b>First Supplemental Response 1/13/17:</b>  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.</p> <p><b>Third Supplemental Response 7/5/17:</b>  Defendant refers Plaintiff to Sterling's financial documents produced herewith.</p>	<p>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</p>	<p>Defendant has provided the tax returns for Sterling for the year 2006 only.</p> <p>Still missing are the years: 2005, and 2007, 2008, 2009, 2010, 2011, 2013, 2014, 2015, and 2016.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #68	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>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.</p>	<p>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 information is only relevant to Plaintiff's claims 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.</p>	<p><b>First Supplemental Response 1/13/17:</b> 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.</p> <p><b>Third Supplemental Response 7/5/17:</b> Defendant has no budgets, and it was not required to make them.</p>	<p>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</p>	<p>Defendant has provided no financial information whatsoever in response to this Request. Budgets were not the only items requested. Defendant was ordered to produce "financial statements", which include, but aren't limited to income statements, statements of cash flow, etc.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #69	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>Documents which reflect the ownership and value of the property occupied by Country Wood Nursing Care Center.</p>	<p>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. Request 69 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. Request 69 is therefore, premature, irrelevant and improper.</p>	<p><b>First Supplemental Response 1/13/17:</b> 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.</p> <p><b>Third Supplemental Response 7/5/17:</b> 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.</p>	<p>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</p>	<p>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.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #70	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (#43)	Current Status
<p>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.</p>	<p>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.</p>		<p>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</p>	<p>Defendant has provided a single tax return from 2006. No other document has been provided whatsoever.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to STERLING #72	Sterling's Original Response:	Sterling's Supplemental Response	Judge Dickson's ORDER (¶43)	Current Status
<p>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.</p>	<p>Defendant refers Plaintiff to documents produced herewith.</p>	<p><b>First Supplemental Response</b> 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.</p> <p><b>Second Supplemental Request:</b> 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.</p>	<p>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</p>	<p>The only documents produced to date regarding the relationship between the co-defendants is one contract for Guardian dated 2011 and 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.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provide by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

# **EXHIBIT 7**

Interrogatory to GUARDIAN #4	Guardian's Original Response: 11/14/2014	Guardian's Supplemental Responses:	Judge Dickson's ORDER (¶45)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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. <i>Ballard v. Allegheny Airlines Inc.</i>, 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.</p>	<p><b>1<sup>st</sup> Supplemental Response:</b> 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 Certificates of Insurance for policies in place during Decedent's residency at Defendant County Wood's facility and will supplement this response upon receipt.</p> <p><b>Second Supplemental Response 5/18/15:</b> 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.</p> <p><b>Third Supplemental Response: 1/13/17:</b> 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.</p> <p><b>Forth Supplemental Response: 7/5/17:</b> Defendant would have been covered under the same insurance policy as Countrywood, if at all. Defendant refers Plaintiff to Country wood's responses regarding insurance coverage.</p>	<p>Defendant Countrywood is hereby Ordered to completely and fully respond to Interrogatory #4. 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.</p>	<p>Guardian 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 and Guardian is listed separately on the form as an insured. There is no information provided as to the name of the insurance company and <u>no policy was produced</u> 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.</p> <p>No other supplement or insurance information has been provided for Guardian.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to Guardian #5	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶46)	Current Status
<p>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.</p>	<p>Defendant objects to the 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 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.</p>	<p><b>First Supplemental Response: 5/18/15</b>  Defendant renews its objections to this interrogatory as stated in its Original Response above. Subject to and without waiving these objections, see Defendant Country Wood's Supplemental response to Interrogatory #3 served simultaneously herewith.</p> <p><b>CW's Supplemental Response to Interrogatory #3 states:</b>  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.</p>	<p>Defendant 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 injuries and Death and/or to admit that there are liable parties to this matter other than those already named in this litigation.</p>	<p>No additional response received from Guardian, despite Judge Dickson's Order.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to Guardian #8	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶47)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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 County Wood's facility. Defendant does not possess information responsive to Interrogatory #8.</p>	<p><b>First Supplemental Response: 5/18/15</b>  Defendant renews its objections to this Interrogatory as stated 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 County Woods' facility and will supplement this Response upon receipt.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #5 in its entirety.</p>	<p>No other supplement has been provided for Guardian. No payroll information for the individuals who rendered care to the Plaintiff have been produced. This was promised in May 2015, over 2 years ago.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to Guardian #14	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶47)	Current Status
<p>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.</p>	<p><b>Original Response:</b>  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.</p>	<p><b>First Supplemental Response:</b>  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.</p> <p><b>Second Supplemental Response:</b>  <b>1/13/17:</b>  In light of the recent discovery Order of Judge Dickson, Defendant is in the process of identifying and collecting responsive documents 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.</p> <p><b>Third Supplemental Response:</b>  <b>7/5/17:</b> Defendant has no record of any litigation or claim against it during the relevant period; accordingly, upon information and belief, none.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #5, 8, 14, 15, and 40 in their entirety.</p>	

Interrogatory to GUARDIAN #15	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶47)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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 waiver of the foregoing objections, Defendant does not possess information responsive to Interrogatory No. 15.</p>		<p>Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #5, 8, 14, 15, and 40 in their entirety.</p>	<p>Defendant has still failed to answer this interrogatory, despite the Order of Judge Dickson.</p> <p>Defendant is the purported management company for Countrywood, and thus, Defendant should be aware of and in possession or control of this information.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Interrogatory to GUARDIAN #40	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶47)	Current Status
<p>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.</p> <p>Further, identify the number of other beds in the Country Wood facility which were altered in the same manner and the date of such alteration.</p>	<p><b>Original Response:</b> 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.</p>	<p><b>Supplemental Response:</b> 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 the 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).</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Interrogatory #5, 8, 14, 15, and 40 in their entirety.</p>	<p>Defendant has still failed to answer this interrogatory, despite the Order of Judge Dickson.</p> <p>Judge Dickson also authorized additional interrogatories. Defendant is the purported management company for Countrywood, and thus, Defendant should be aware of and in possession or control of this information.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

# EXHIBIT 8

RFPD to GUARDIAN #7	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶49)	Current Status
<p>Copy of the complete text, including all endorsements thereto, of any insurance policy which may be applicable to the Plaintiffs' claim.</p>	<p><b>Original Response:</b> 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 <i>Ballard v. Allegheny Airlines, Inc.</i>, 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.</p>	<p><b>First Supplemental Response:</b> 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.</p> <p><b>Second Supplemental Response 1/13/17:</b> 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.</p>	<p>Defendant Guardian shall answer, in their entirety, all Request for Production propounded to the Defendant, including those specifically referenced in Plaintiffs Memorandum in Support of Motion to Compel.</p>	<p>Defendant has still failed to answer this Request and has failed to produce any information related to insurance covering Guardian and/or Robert Hagan.</p> <p>This is a standard discovery request. Information has been requested for three years and has yet to be received.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #17	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (#51)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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.</p>	<p><b>First Supplemental Response:</b> Defendant renews its objections to this Request as stated 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 County Wood's facility and will supplement this Response upon receipt.</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant has no information responsive to this Request.</p>	<p>Defendant Sterling is hereby Ordered to completely and fully respond to Request for Production #17 in its entirety. This Order includes but is not limited to the production of all payroll documents and employee files.</p>	<p>Defendant has still failed to respond fully to this Request. No payroll records, salary information, etc. whatsoever have been provided for any employee, owner, staff, administrators, etc., in violation of Judge Dickson's Order.</p> <p>Guardian's contract with Countrywood specifically states that Guardian is in charge of accounting and payroll services for the facility. To assert that they have no information responsive to this request is in direct conflict with the services they claim to have provided for Countrywood.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #18	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶52)	Current Status
<p>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.</p>	<p>See Defendant's Objections and Response to Request for Production No. 17.</p>	<p><b>First Supplemental Response:</b> See Defendant's Supplemental Response to Request for Production No. 17</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant has no information responsive to this Request.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #18, 24,25, 34, and 35 in their entirety.</p>	<p>Defendant has responded by referring Plaintiff to another incomplete response, #17.</p> <p>Defendant has still failed to respond fully to this Request.</p> <p>No payroll records, salary information, etc. whatsoever have been provided for any employee, owner, staff, administrators, etc., in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #24	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶52)	Current Status
<p>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.</p>	<p><b>Original Response:</b> 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.</p>	<p><b>First Supplemental Response: 1/13/17:</b> 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.</p> <p><b>Second Supplemental Response 7/3/17:</b> Defendant has not budgets, as it was not required to make them.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #18, 24,25, 34, and 35 in their entirety.</p>	<p>Defendant has still failed to respond fully to this Request.</p> <p>This week, Plaintiff was provided with two tax returns for Defendant Guardian from 2011 and 2015 only. Not a single other document responsive to this request was produced related to Guardian. This request was not limited to budgets only. Guardian was ordered to produce all financial information related to Guardian during 2005-present.</p> <p>The Plaintiff was provided with several hundred pages of documents in the week preceding the hearing related to Countrywood. 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.</p> <p>Likewise, 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.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #25	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (#52)	Current Status
<p>All documents showing payment of any kind made by and/or to 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.</p>	<p><b>Original Response:</b>  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 the 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, [sic] Defendant Country Wood produced herewith. Defendant and undersigned counsel will consider supplementing this Response upon clarification and receipt of additional information from Plaintiff.</p>	<p><b>First Supplemental Response:</b>  Defendant renews its objections to this Request as stated 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.</p> <p><b>Second Supplemental Response: 1/13/17:</b>  In light of Judge Dickson's recent Discovery Order, Defendant is working to determine whether any responsive document exist and will supplement this Response with any such documents upon receipt.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #18, 24,25, 34, and 35 in their entirety.</p>	<p>Defendant has still failed to respond to this Request.</p> <p>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. Did these companies work for free? If so, why? To suggest that there is no record of payments between these Defendants in light of the "consulting agreements" produced, is simply not plausible.</p> <p>The failure to produce full and complete information is a clear violations of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #34	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶52)	Current Status
<p>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.</p>	<p>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.</p>	<p><b>First Supplemental Response:</b> 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.</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant refers Plaintiff to Co-Defendant County Wood's Response to Plaintiff's Interrogatory No. 15 for information responsive to this request.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #18, 24, 25, 34, and 35 in their entirety.</p>	<p>Missing May 2011 Nursing Assignments.</p> <p>Also missing payroll records for the employees to confirm actual hours worked.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #35	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶52)	Current Status
<p>Copies of any and all documents regarding nursing hours per resident per day during Mildred Watkin's residency.</p>	<p>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.</p>	<p><b>First Supplemental Response:</b> 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.</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant refers Plaintiff to Co-Defendant County Wood's Response to Plaintiff's Interrogatory No. 15 for information responsive to this request.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #18, 24,25, 34, and 35 in their entirety.</p>	<p>Missing May 2011 Nursing Assignments.</p> <p>Also missing payroll records for the employees to confirm actual hours worked.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #37	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶52)	Current Status
<p>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.</p>	<p>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.</p>	<p><b>First Supplemental Response:</b> Defendant renews each or its objections for this Request as set forth in its Original Response above and reiterates 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.</p> <p><b>Second Supplemental Response 1/13/17:</b> Defendant has no information responsive to this request.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #37 in its entirety. This Order includes, but it not limited to the production of all payroll information and employee files.</p>	<p>No payroll information has been provided whatsoever.</p> <p>RESPONSE INCOMPLETE</p>

RFPD to GUARDIAN #44	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶54)	Current Status
<p>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.</p>	<p>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).</p>	<p><b>First Supplemental Response:</b> 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 or a narrowly tailored Request from Plaintiff.</p> <p><b>Second Supplemental Response 1/13/17:</b> 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.</p> <p><b>Third Supplemental Response 7/5/17:</b> Defendant possesses no documents responsive to this request.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request #43, 44, 67, 68, 69, 70, and 72 in their entirety.</p>	<p>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.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #67	Guardian's Original Response:	Guardian's Supplemental Response:	Judge Dickson's ORDER (#54)	Current Status
<p>Corporate tax returns for the years 2005-present.</p>	<p>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 CountyWood, and this Defendant has produced document demonstrating that it does or did not provide such services to any resident of Defendant County Wood's facility, including Decedent. Defendant further objects to this request as overbroad, as it seeks information not narrowly tailored to the period of time of events in question.</p>	<p><b>First Supplemental Response 1/13/17:</b>  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.</p> <p><b>Third Supplemental Response 7/5/17:</b>  Defendant refers Plaintiff to Guardian's financial documents produced herewith.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #43, 44, 67, 68, 69, 70, and 72 in their entirety</p>	<p>Defendant has provided the tax returns for Guardian for the years 2011 and 2015 only.</p> <p>Still missing are the years: 2005, 2006, 2007, 2008, 2009, 2010, 2012, 2013, 2014, and 2016.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #68	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶54)	Current Status
<p>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.</p>	<p>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 information is only relevant to Plaintiff's claims 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.</p>	<p><b>First Supplemental Response 1/13/17:</b> 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.</p> <p><b>Third Supplemental Response 7/5/17:</b> Defendant refers Plaintiff to Guardian Resources financial documents produced herewith.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #43, 44, 67, 68, 69, 70, and 72 in their entirety</p>	<p>Defendant has provided no financial information whatsoever in response to this Request beyond 2 tax returns. Defendant was ordered to produce "financial statements", which include, but aren't limited to income statements, statements of cash flow, etc.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #69	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶54)	Current Status
<p>Documents which reflect the ownership and value of the property occupied by Country Wood Nursing Care Center.</p>	<p>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. Request 69 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. Request 69 is therefore, premature, irrelevant and improper.</p>	<p><b>First Supplemental Response 1/13/17:</b> 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.</p> <p><b>Third Supplemental Response 7/5/17:</b> Defendant does not possess any documentation responsive to this Request.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #43, 44, 67, 68, 69, 70, and 72 in their entirety</p>	<p>Defendant Guardian has provided no response to this request. Other defendants have provided a tax return of Ridgewood Nursing Center, LLC for the year 2013. No other information responsive to this request has been produced.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #70	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (§54)	Current Status
<p>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.</p>	<p>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.</p>	<p><b>First Supplemental Response: 1/13/17</b> 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.</p> <p><b>Second Supplemental Response 7/3/17:</b> Defendant refers Plaintiff to its attached tax return for information responsive to this request.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #43, 44, 67, 68, 69, 70, and 72 in their entirety</p>	<p>Defendant has provided tax returns for 2011 and 2015 only. This production is not a sufficient response to this requests. No other document has been provided whatsoever.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

RFPD to GUARDIAN #72	Guardian's Original Response:	Guardian's Supplemental Response	Judge Dickson's ORDER (¶54)	Current Status
<p>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.</p>	<p>Defendant refers Plaintiff to documents produced herewith.</p>	<p><b>First Supplemental Response</b> 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.</p> <p><b>Second Supplemental Request:</b> To Defendant's knowledge, all responsive documents in Defendant's possession have been previously produced. In the event Defendant locates additional information responsively to this Request, Defendant will seasonably supplement this response.</p>	<p>Defendant Guardian is hereby Ordered to completely and fully respond to Request for Production #43, 44, 67, 68, 69, 70, and 72 in their entirety</p>	<p>The only documents produced to date regarding the relationship between the co-defendants is one contract for Guardian dated 2011 and 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.</p> <p>No further response has been provided to this request, in violation of Judge Dickson's Order.</p> <p>No other supplement or information has been provided by Defendant.</p> <p><b>RESPONSE REMAINS INCOMPLETE</b></p>

Notice of Substitution of Counsel  
dated May 13, 2016

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 MILDRED 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

CIVIL ACTION NO. 2014-CP-48-5160

2016 MAY 13 PM 2:13  
 JEANETTE M. MORRIS  
 C.C.P. & G.S.  
 RICHLAND COUNTY  
 FILED

**NOTICE OF SUBSTITUTION OF COUNSEL**

NOTICE is hereby given that Defendants hereby substitute Leah Fox Parker of Lewis Brisbois Bisgaard & Smith LLP as local counsel of record in the above-referenced action. All further notices, pleadings, orders, or filings of any kind directed to Defendants shall be served on:

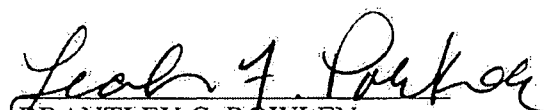
Brantley C. Rowlen  
 Leah F. Parker  
 LEWIS BRISBOIS BISGAARD & SMITH LLP  
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 brantley.rowlen@lewisbrisbois.com  
 leah.parker@lewisbrisbois.com

Respectfully submitted, this 9<sup>th</sup> day of May, 2016.

*(Signature on following page).*

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BRANTLEY C. ROWLEN  
Admitted *Pro Hac Vice*  
LEAH F. PARKER  
South Carolina Bar No. 101200

*Counsel for Defendants*

## Richland County Roster Notices



# Richland County Fifth Judicial Circuit Public Index










Richland County Home Page Online Payments Public Index City of Columbia Municipal Ct S.C. Judicial Department Summary Ct Dockets

**Switch View**

<b>Jean Watkins , plaintiff, et al vs Sterling Healthcare Inc , defendant, et al</b>					
Case Number:	2016CP4004463	Court Agency:	Richland County Common Pleas	Filed Date:	07/27/2016
Case Type:	Common Pleas	Case Sub Type:	Medical Malpract 220	File Type:	Jury
Status:	Appeal	Assigned Judge:			
Disposition:		Disposition Date:		Disposition Judge:	
Original Source Doc:		Original Case #:		Restore Reason:	Reopen Case Rule 40J
Judgment Number:		Court Roster:			

Case Parties | Judgments | Tax Map Information | Associated Cases | Actions | Financials

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Sterling Healthcare Inc	Appeal/Notice of Appeal to Court of Appeals	Action		05/16/2018-12:21		
Sterling Healthcare Inc	NEF(05-15-2018 12:21:02 PM) Appeal/Notice of Appeal to C...	Filing		05/15/2018-12:32		
Watkins, Jean	NEF(04-19-2018 04:18:27 PM) Order/Sanctions	Filing		04/19/2018-16:18		
Watkins, Jean	Order Striking Answer of All Defendant	Order		04/19/2018-16:18		
Watkins, Jean	Motion/Damages	Motion		04/19/2018-16:17		
Watkins, Jean	NEF(04-03-2018 10:51:01 AM) Order/Form 4	Filing		04/03/2018-10:51		
Watkins, Jean	Order/Form 4	Order		04/03/2018-10:51		
Watkins, Jean	NEF(03-28-2018 02:46:44 PM) Order/Scheduling Order	Filing		03/28/2018-14:46		
Watkins, Jean	Consent Scheduling Order trial not before October 1, 2018	Order		03/28/2018-14:46		
Watkins, Jean	NEF(03-28-2018 01:21:19 PM) Proposed Order/Scheduling Or...	Filing		03/28/2018-14:13		
Watkins, Jean	Order/Order Cover Sheet \$25.00	Filing		03/28/2018-13:21		
Purdy, Jennifer Randolph	4/16/2018_J1_Roster/Notice of Case Roster Publication Sent	Action		03/16/2018-14:43		
Parker, Leah Fox	4/16/2018_J1_Roster/Notice of Case Roster Publication Sent	Action		03/16/2018-14:43		
Coia, Erin Lawson	4/16/2018_J1_Roster/Notice of Case Roster Publication Sent	Action		03/16/2018-14:43		
Coia, Erin Lawson	4/2/2018_J1_Roster/Notice of Case Roster Publication Sent	Action		03/05/2018-10:23		
Parker, Leah Fox	4/2/2018_J1_Roster/Notice of Case Roster Publication Sent	Action		03/05/2018-10:23		
Purdy, Jennifer	4/2/2018_J1_Roster/Notice of Case Roster Publication Sent	Action		03/05/2018-10:23		

<b>Randolph</b>						
<b>Purdy, Jennifer Randolph</b>	11/13/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		10/12/2017-15:10		
<b>Parker, Leah Fox</b>	11/13/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		10/12/2017-15:10		
<b>Coia, Erin Lawson</b>	11/13/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		10/12/2017-15:10		
<b>Coia, Erin Lawson</b>	9/5/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		08/01/2017-15:39		
<b>Purdy, Jennifer Randolph</b>	9/5/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		08/01/2017-15:39		
<b>Parker, Leah Fox</b>	9/5/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		08/01/2017-15:39		
<b>Watkins, Jean</b>	Memo in Support of Motion for Rule to show Cause and Sanctio	Filing		07/31/2017-16:35		
<b>Watkins, Jean</b>	Memo in Support Of Motion For Rule To Show Cause And Sanctio	Filing		07/31/2017-15:47		
<b>Purdy, Jennifer Randolph</b>	7/31/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		06/30/2017-13:40		
<b>Coia, Erin Lawson</b>	7/31/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		06/30/2017-13:40		
<b>Parker, Leah Fox</b>	7/31/2017_J1_Roster/Notice of Case Roster Publication Sent	Action		06/30/2017-13:40		
<b>Purdy, Jennifer Randolph</b>	7/10/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		06/15/2017-10:42		
<b>Coia, Erin Lawson</b>	7/10/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		06/15/2017-10:42		
<b>Parker, Leah Fox</b>	7/10/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		06/15/2017-10:42		
<b>Watkins, Jean</b>	Motion/Motion Filing Fee	Filing		01/23/2017-16:53		
<b>Watkins, Jean</b>	Affidavit of Jennifer Purdy	Filing		01/23/2017-14:24		
<b>Watkins, Jean</b>	Motion for Rule to Show Cause	Motion		01/23/2017-14:24		 
<b>Watkins, Jean</b>	Consent Order/Restore Case To Active Docket	Order		07/27/2016-10:14		
<b>Watkins, Jean</b>	Notice of Motion/ Motion For an Order to Restore Case to	Motion		07/27/2016-10:12	07/27/2016-10:12	
<b>Watkins, Jean</b>	For Earlier Filings See 2014-CP-40-05160	Filing		07/27/2016-10:10		
<b>Watkins, Jean</b>	Filing Fees Not Waived	Filing		07/27/2016-09:21		

Certificate of Counsel

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The undersigned hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

December 11, 2018

/s/ Kate Cappelmann  
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Attorney for Appellants