

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Maité Murphy, Circuit Court Judge

Appellate Case No. 2019-000671

RECEIVED
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SC Court of Appeals

Tammy C. Richardson,

Respondent,

v.

Halcyon Real Estate Services, LLP and
McCabe, Trotter & Beverly, P.C.,

Defendants,

of whom

McCabe, Trotter & Beverly, P.C. is the

Appellant.

APPELLANT'S MEMORANDUM IN SUPPORT OF THE IMMEDIATE
APPEALABILITY OF THE ORDER GRANTING PLAINTIFF'S MOTION FOR
SANCTIONS FOR DEPOSITION MISCONDUCT AND DENYING DEFENDANT'S
MOTIONS FOR PROTECTION (SELF AND GATLING)

Appellant McCabe, Trotter & Beverly, P.C. ("Appellant") hereby submits that the
Order Granting Plaintiff's Motion for Sanctions for Deposition Misconduct and Denying
Defendant's Motions for Protection (Self and Gatling) filed on April 4, 2019, ("Order") is

immediately appealable because (1) the award to Respondent from Appellant of monetary sanctions constitutes an immediately appealable final judgment, (2) the order that depositions “be conducted and completed unimpeded” and that Appellant’s counsel “cease and desist” certain conduct constitutes an immediately appealable injunction, (3) the order governing the manner in which depositions shall proceed is an order that affects a substantial right of Appellant for which there can be no effective review after final judgment, (4) the proper interpretation of Rule 30(j)(8), SCRCF, constitutes an issue of significant interest and important legal principle about which the parties and South Carolina Bar need guidance, and (5) there is an appealable issue before this Court so that the other issues before the Court should also be reviewed. As a result, Appellant respectfully requests that this Court review the Order Granting Plaintiff’s Motion for Sanctions for Deposition Misconduct and Denying Defendant’s Motions for Protection (Self and Gatling) filed on April 4, 2019. (Or. Granting Mot. Sanctions, attached Exhibit A).

STATEMENT OF THE CASE

This matter began as a foreclosure action against Respondent filed by Appellant on behalf of Southern Magnolia Homeowners’ Association (“HOA”) on August 10, 2015 (“Foreclosure Action”). In that action, the HOA sought to foreclose upon Respondent’s interest in certain real property pursuant to a lien arising from Respondent’s failure to satisfy certain assessments and charges imposed upon Respondent by the HOA pursuant to the HOA’s governing documents. In addition to the unpaid assessments, interest, and other charges, the HOA sought to recover from Respondent reasonable attorneys’ fees and

other costs of litigating the Foreclosure Action pursuant to the terms of the HOA's governing documents.

Respondent generally denied the allegations of the Foreclosure Action, raised certain affirmative defenses, and asserted counterclaims against the HOA alleging actions for accounting, breach of contract and an implied covenant of good faith and fair dealing, unjust enrichment, and violation of the South Carolina Unfair Trade Practices Act. In addition, Respondent asserted third-party claims against Appellant and the HOA's property manager, Halcyon Real Estate Services, LLC, ("Property Manager")¹ alleging actions for accounting and violation of the South Carolina Unfair Trade Practices Act on behalf of herself and all South Carolina homeowners from whom Appellant sought or collected attorneys' fees, costs, collection fees, or interest on behalf of a homeowners' association ("Class Action"). Respondent generally alleges that Appellant misrepresented the amount of attorneys' fees incurred by the HOA and other creditors in similar actions.

On May 5, 2016, the Class Action was severed from the Foreclosure Action. Although Respondent and the HOA stipulated to the dismissal with prejudice of the Foreclosure Action on December 28, 2016, the Class Action continues pursuant to an Order Granting Class Certification filed on January 12, 2018 (attached Exhibit B). As of the date of this memorandum, Respondent alleges approximately 6,922 putative class members.

STATEMENT OF FACTS

On Friday, November 9, 2018, Respondent served Appellant with Plaintiff's Notice of Videotaped Deposition of Haylen Gatling ("Gatling Notice"), which informed Appellant

¹ On August 24, 2018, the parties filed a Stipulation of Dismissal with Prejudice as to Halcyon Real Estate Services, LLC, which is no longer a party to this action.

that counsel for Respondent would be taking videotaped deposition testimony from the witness, who is a paralegal employed by Appellant, on Tuesday, January 15, 2019. The notice also provided as follows:

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(j)(8), SCRCP, counsel for the [Respondent] hereby identifies and reserves the right to use any documents produced or made available in discovery by any party during this deposition, and hereby gives notice of the Plaintiff's intent to question the witness regarding all documents produced, identified or made available by any party during the course of discovery, as well as those obtained pursuant to subpoena or records request.

(Gatling Notice of Dep. 1-2, attached Exhibit C.) The Gatling Notice also included a subpoena commanding the witness' presence at the deposition. (Id.)

On Tuesday, November 13, 2018, Respondent also served Appellant with Plaintiff's Notice of Videotaped Deposition of Sheri Self ("Self Notice"), which informed Appellant that counsel for Respondent would be taking videotaped deposition testimony from the witness, who is a paralegal formerly employed by Appellant, on Thursday, January 24, 2019. The notice similarly provided as follows:

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(j)(8), SCRCP, counsel for the [Respondent] hereby identifies and reserves the right to use any documents produced or made available in discovery by any party during this deposition, and hereby gives notice of the Plaintiff's intent to question the witness regarding all documents produced, identified or made available by any party during the course of discovery, as well as those obtained pursuant to subpoena or records request.

(Self Notice of Dep. 1-2, attached Exhibit D.) The Self Notice did not contain a subpoena commanding the witness' presence at the deposition. (Id.)

On Wednesday, November 14, 2018, counsel for Appellant informed counsel for Respondent in writing that, in light of the thousands of documents produced during the discovery conducted to date, the Gatling and Self Notices' purported identification of "all

documents produced, identified or made available by any party during the course of discovery, as well as those obtained pursuant to subpoena or records request” did not comport with the requirement in Rule 30(j)(8), SCRCP, that deposing counsel provide opposing counsel with a copy or otherwise identify all documents shown to the witness during the deposition at least two business days before the deposition to avoid invocation of the witness and witness’ counsel’s right to discuss such documents privately before the witness answers questions about them. (Letter from Andrew W. Countryman to Justin S. Kahn (Nov. 14, 2018), attached Exhibit E.) Accordingly, Appellant’s counsel informed Respondent’s counsel that the witnesses specifically reserved the right to discuss any material presented during the deposition privately with their counsel before answering questions about the material. (Id.)

After failing for 57 days to respond to Appellant’s counsel’s correspondence, at 6:31 p.m. on Friday, January 11, 2019, Respondent’s counsel e-mailed Appellant’s counsel a 68-page spreadsheet identifying for use at the deposition of Haylen Gatling, inter alia, the transcripts and exhibits to four previously taken depositions, Appellant’s Answer and written responses to discovery, and the bates numbers of thousands of pages of documents produced during the course of discovery. (Gatling Dep. Spreadsheet, attached Exhibit F.) On the following Monday, January 15, 2019, counsel for Appellant again informed counsel for Respondent that the purported identification did not comport with the requirement in Rule 30(j)(8), SCRCP. (Letter from Andrew W. Countryman to Justin S. Kahn (Jan. 15, 2018), attached Exhibit G.)

During the deposition of Haylen Gatling, counsel for Respondent entered sixteen exhibits and showed the witness approximately ten documents about which deposing

counsel sought to elicit testimony from the witness. (Gatling Dep. Tr., pp. 1-4, attached Exhibit H.) In response to the presentation of the first document, counsel for Appellant invoked the witness and the witness' counsel's right to discuss the documents privately before the witness answered questions about them pursuant to Rule 30(j)(8), SCRCF. (Gatling Depo. Tr. pp. 182-87, attached Exhibit I.) Upon resumption of the deposition, counsel for Respondent asked the witness, "What did you all talk about?" (Id. at 186.) Counsel for Appellant directed the witness not to answer the question on the grounds of attorney-client privilege. (Id. at 186-87.) On January 21, 2019, Appellant filed McCabe, Trotter & Beverly, P.C.'s Motion for Protective Order (Deposition of Haylen Gatling) seeking an order protect the communication between the witness and counsel for Appellant during their discussion about the documents presented to the witness by deposing counsel during the deposition. (Mot. for Protective Or. Gatling, attached Exhibit J.)

At 4:59 p.m. on Monday, January 21, 2019, Respondent's counsel again e-mailed Appellant's counsel a 67-page spreadsheet identifying for use at the deposition of Sheri Self, inter alia, the exhibits to five previously taken depositions and the bates numbers of thousands of pages of documents produced during the course of discovery. (Self Dep. Spreadsheet, attached Exhibit K.) During the deposition of Sheri Self, Respondent's counsel showed the witness nineteen documents about which deposing counsel sought to elicit testimony from the witness. (Self Depo. Tr. pp. 3-5, attached Exhibit L.) In response to the presentation of the first document, counsel for Appellant again invoked the witness and the witness' counsel's right to discuss the documents privately before the witness answered questions about them pursuant to Rule 30(j)(8), SCRCF. (Self Depo. Tr. pp. 20-24, attached Exhibit M.) Upon resumption of the deposition, counsel for Respondent asked

the witness, “[W]hat did you all talk about?” (Id. at 22.) Counsel for Appellant directed the witness not to answer the question on the grounds of attorney-client privilege. (Id. at 22-23.) At approximately 12:22 p.m., Appellant’s counsel informed deposing counsel during a break during the deposition of a need to end the deposition at 3:00 p.m. (Self Depo. Tr. p. 223-28, attached Exhibit N.) Despite the objections of Respondent’s counsel, Appellant’s counsel sought to end the deposition promptly at approximately 3:00 p.m. (Id.) At that time, the witness left the deposition over the objections of Respondent’s counsel and the deposition adjourned at 3:13 p.m. (Id. at 227-28.)

On January 31, 2019, Appellant filed McCabe, Trotter & Beverly, P.C.’s Motion for Protective Order (Deposition of Sheri Self) seeking an order protect the communication between the witness and counsel for Appellant during their discussion about the documents presented to the witness by deposing counsel during the deposition. (Mot. for Protective Or. Self, attached Exhibit O.) On February 7, 2019, Respondent filed [Respondent]’s Notice and Motion for Sanctions and Memorandum in Support Thereof Concerning Improper Deposition Conduct of MTB Counsel. (Mot. for Sanctions, attached Exhibit P.) Respondent generally alleged that counsel for Appellant disrupted depositions, engaged in witness coaching during depositions to have impermissible off-the-record discussions with witnesses about documents previously produced, and improperly instructed a witness to leave a deposition prior to its conclusion. (Id.) Respondent sought, inter alia, an order for an award of monetary sanctions, an order directing witnesses to testify in full as to the matters discussed between the witnesses and witnesses’ counsel during the off the record conversations during the deposition proceedings, and an order barring Appellant’s counsel from undertaking similar conduct in future depositions. (Id.)

On April 4, 2019, the Circuit Court issued the Order Granting Plaintiff's Motion for Sanctions for Deposition Misconduct and Denying Defendant's Motions for Protection (Self and Gatling) ("Order"). (Or. Granting Mot. Sanctions, attached Exhibit A). In the Order, the Circuit Court determined the applicable law and made factual findings in deciding, inter alia, that (1) the depositions of Gatling and Self "be reconvened and continue so the depositions can be conducted and completed unimpeded", (2) the witnesses answer questions concerning the matters discussed during off the record conferences with their counsel, (3) the Appellant's counsel is not to instruct the witnesses not to respond to questions regarding off the record conferences, and (4) that Appellant pay as monetary sanctions the costs of certain depositions.² (Id.) The Order further provided that Appellant's counsel "shall cease and desist" from such behavior. (Id.) The Order does not specifically reference Rule 30(j)(8), SCRCP. (See id.)

On April 15, 2019, Appellant filed a Motion to Reconsider Order Entered on April 4, 2019, and to Stay Relief Granted in Order ("Motion to Reconsider"). (Mot. to Reconsider, attached Exhibit Q.) On April 22, 2019, the Circuit Court informed the parties of the denial of the Motion to Reconsider without a hearing. (E-Mail from Chandler D. Rowh to Robert Wood (May. 10, 2019), attached Exhibit R.) Appellant then served and filed the Notice of Appeal along with a Motion to Stay the Depositions of Haylen Gatling and Stephanie Trotter and All Other Relief Granted in the Order ("Motion to Stay") in this

² The Order fixed the amount of the sanction for the costs of the prior depositions of Gatling and Self at a total of Ten Thousand Eight Hundred Sixty-Five and 50/100 Dollars (\$10,865.50). The amount of the sanction for the costs of the subsequent depositions of Gatling and Trotter became fixed by the filing of Attorney's Fees Affidavit of Justin S. Kahn Re April 23, 2019 Deposition Time Gatling and Trotter on May 1, 2019. The amount of the sanction for the costs of the subsequent deposition of Self will become fixed upon the filing of an affidavit of attorneys' fees on or before May 24, 2019.

Court on April 22, 2019. This Court denied Appellant's Motion to Stay on April 22, 2019, and the depositions of Haylen Gatling and Stephanie Trotter proceeded on April 23, 2019. The Circuit Court filed an Order Denying Defendant McCabe, Trotter & Beverly P.C.'s Motion for Reconsideration on April 26, 2019. The subsequent deposition of Sheri Self proceeded on May 10, 2019.

ARGUMENTS

"Appeal may be taken, as provided by law, from any final judgment, appealable order, or decision." Rule 201, SCACR. The Court of Appeals shall have appellate jurisdiction for the correction of errors of law where:

- (1) Any intermediate judgment, order or decree in a law case involving the merits in actions commenced in the court of common pleas and general sessions, brought there by original process or removed there from any inferior court or jurisdiction, and final judgments in such actions; provided, that if no appeal be taken until final judgment is entered the court may upon appeal from such final judgment review any intermediate order or decree necessarily affecting the judgment not before appealed from;
- (2) An order affecting a substantial right made in an action when such order (a) in effect determines the action and prevents a judgment from which an appeal might be taken or discontinues the action, (b) grants or refuses a new trial or (c) strikes out an answer or any part thereof or any pleading in any action;
- (3) A final order affecting a substantial right made in any special proceeding or upon a summary application in any action after judgment; and
- (4) An interlocutory order or decree in a court of common pleas granting, continuing, modifying, or refusing an injunction or granting, continuing, modifying, or refusing the appointment of a receiver.

S.C. Code § 14-3-330 (1976).

"As a general rule, only final judgments are appealable." Ex parte Wilson v. Pender, 367 S.C. 7, 12, 625 S.E.2d 205, 208 (2005) (citing Culbertson v. Clemens, 322 S.C. 20,

23, 471 S.E.2d 163 (1996)). “Any judgment or decree, leaving some further act to be done by the court before the rights of the parties are determined, is interlocutory and not final.” Id. at 12-13, 625 S.E.2d at 208 (citing Mid-State Distribs., Inc. v. Century Importers, Inc., 310 S.C. 330, 336, 426 S.E.2d 777, 780 (1993); Good v. Hartford Accident Indemn. Co., 201 S.C. 32, 21 S.E.2d 209 (1942) (“a final judgment is one which operates to divest some right in such a manner as to put it beyond the power of the Court making the order to place the parties in their original condition after the expiration of the term”)). “If a judgment determines the applicable law while leaving open questions of fact, it is not a final judgment.” Mid-State Distributors, Inc., 310 S.C. at 335, 426 S.E.2d at 780 (citing Good, 201 S.C. at 32, 21 S.E.2d at 212). “The object of th[e] requirement (that an order or judgment must be final before an appeal will lie) is to present the whole cause for determination in a single appeal and thus to prevent the unnecessary expense and delay of repeated appeals.” Good, at 32, 21 S.E.2d at 212 (quoting 2 R.C.L. Appeal and Error § 21).

I. The Award of Monetary Sanctions Constitutes an Immediately Appealable Final Judgment

An order denying or compelling pretrial discovery is generally not directly appealable “because it leaves some further act to be done by the court before the rights of the parties in an enforcement proceeding are determined.” Ex parte Wilson v. Pender, 367 S.C. 7, 13, 625 S.E.2d 205, 208 (2005) (citing Lowndes Products, Inc. v. Brower, 262 S.C. 431, 205 S.E.2d 184 (1974)). However, “a writ of error will lie . . . to a final judgment or an award in the nature of a final judgment[.]” Good, at 32, 21 S.E.2d at 212. A contempt order, for example, is “a final order that is immediately appealable.” Hooper v. Rockwell, 334 S.C. 281, 291, 513 S.E.2d 358, 364 (1999). This is because “[a] civil compensatory

fine is analogous to a tort judgment for damages caused by wrongful conduct.” Jarrell v. Petoseed Co., 331 S.C. 207, 210, 500 S.E.2d 793, 794 (Ct. App. 1998). Accordingly, contempt orders stand apart from the underlying action. Id. (“Civil compensatory contempt’s purpose . . . is not coercive, but rather is designed to remedy past noncompliance. Termination of the prior action between the parties, therefore, does not render [an] appeal moot.”). As a result, contempt orders involve the merits and determine a substantial matter forming an underlying cause of action. Id. at 213 n.1, 500 S.E.2d at 796 n.1.

In Hooper v. Rockwell, 334 S.C. 281, 513 S.E.2d 358 (1999), the South Carolina Supreme Court held that any order issued as a result of a merit hearing or contempt proceeding constitutes an immediately appealable final order. Id. at 291-92, 513 S.E.2d at 364. In Hooper, a parent challenged the family court’s issuance of a consent emergency removal order, an ex parte emergency removal order, and an emergency removal order issued as the result of a probable cause hearing, as well as an emergency removal order issued as the result of a merits hearing and a contempt order issued by the family court. Id. at 286-88, 513 S.E.2d at 361-62. The Supreme Court held that the consent order, ex parte order, and order issued as the result of a probable cause hearing constituted interlocutory orders that were not immediately appealable. Id. at 290-91, 513 S.E.2d at 363. The Hooper Court conversely held that the order issued as the result of a merits hearing and the contempt order were final orders that are immediately appealable. Id. at 291-92, 513 S.E.2d at 364. The Supreme Court reasoned that such orders constitute final orders because they are issued after a hearing at which the parties have presented their case and evidence to the

court, had an opportunity to challenge the evidence, and the court has made determinations of law and fact in accordance with the burden of proof. Id.

Although no reported South Carolina case addresses whether a non-contempt monetary sanction constitutes an immediately appealable final order, the majority rule among federal circuit courts of appeal is that a district court decision imposing monetary sanctions is final once the amount of the sanction has been decided by the court.³ See e.g., Orenshteyn v. Citrix Systems, Inc., 691 F.3d 1356, 1357-58 (Fed. Cir. 2012); View Engineering, Inc. v. Robotic Vision Systems, Inc., 115 F. 3d 962 (Fed. Cir. 1997). The federal courts reason that, unlike other judicial relief, attorneys' fees are not compensation for an injury giving rise to an action and, therefore, are uniquely separable from the cause of action to be proved at trial. White v. N.H. Dep't of Emp't Sec., 455 U.S. 445, 452, 102 S.Ct. 1162, 1166 (1982). As a result, monetary sanctions are "treated as separate final decisions, which must be covered by separate notices of appeal—each filed after the subject has independently become 'final'." McCarter v. Ret. Plan for the Dist. Managers of the Am. Family Ins. Grp., 540 F.3d 649, 652 (7th Cir. 2008).

Like contempt orders, the monetary sanctions provided for in the Order are designed to remedy past noncompliance and stand apart from the underlying action. (See Order Granting Pl.'s Mot. for Sanctions 7.) ("[P]rejudice has been shown in the form of expenditure of costs and wasted time of deposing counsel and the witness. There is a clear need to deter this conduct in the future and to protect against discovery abuse."). Moreover,

³ The South Carolina Supreme Court has previously looked to federal courts for guidance when determining whether orders not previously considered constitute immediately appealable final orders. See Ex parte Wilson v. Pender, 367 S.C. 7, 13 & 16 n.1, 625 S.E.2d 205, 208 & 210 n.1 (2005).

the Order was issued after a hearing at which the parties presented their case and evidence, had an opportunity to challenge the evidence, and the court made determinations of law and fact in accordance with the burden of proof. (See id. 7.) (“It has been shown that [Appellant]’s counsel acted willfully and in bad faith.”) In addition, the amount of the sanction has been decided by the court. (See id. 7-9.) As a result, the monetary sanctions constitute a final, separate decision that is immediately appealable.

II. The Order that Depositions “Be Conducted and Completed Unimpeded” and that Appellant’s Counsel “Cease and Desist” Certain Conduct Constitutes an Immediately Appealable Injunction

Although an order directing a party or non-party to submit to discovery is generally not immediately appealable, see Ex parte Whetstone v. Whetstone, 289 S.C. 580, 347 S.E.2d 881 (1986), an interlocutory order or decree granting, continuing, modifying, or refusing an injunction is immediately appealable. S.C. Code § 14-3-330 (1976). Even those orders that are “in the nature of an injunction” are immediately appealable. Eldridge v. City of Greenwood, 308 S.C. 125, 127, 417 S.E.2d 532, 534 (1992). For example, an order prohibiting a party from communicating with potential members of a class action is in the nature of an injunction and immediately appealable. Id. An order freezing a party’s accounts until a full hearing on the merits is also in the nature of an injunction and immediately appealable. Ex parte McFarlin v. Renfrow, No. 2007-UP-073, 2007 WL 8326605, at *2 (S.C. Ct. App. Feb. 12, 2007).

Like the order prohibiting a party from communicating with potential members of a class action in Eldridge, the instant order that depositions “be conducted and completed unimpeded” and that Appellant’s counsel “cease and desist” certain conduct constitutes an immediately appealable injunction because the order proscribes Appellant and Appellant’s

counsel from taking both specified and unspecified actions is in the nature of an injunction and immediately appealable. By prohibiting future conduct, including asserting attorney-client privilege and the witness and the witness' counsel's right to discuss the documents privately before the witness answers questions about them pursuant to Rule 30(j)(8), SCRPC, during depositions, this proscription goes beyond directing a party or non-party to submit to discovery. Moreover, the injunction is improper. See Tucker v. Honda of South Carolina Manufacturing, Inc., 354 S.C. 574, 578, 582 S.E.2d 405, 407 (2003), (“[A] trial court should not require the disclosure of attorney client communications to other parties without first determining whether the communications are privileged by inquiring into all the facts and circumstances of the communication.”). As the Order's prohibition on Appellant and Appellant's counsel taking both specified and unspecified actions is in the nature of an injunction, the Order is immediately appealable.

III. The Order Governing the Manner in which Depositions Shall Proceed is an Order that Affects a Substantial Right of Appellant for Which There Can Be No Effective Review After Final Judgment

“[A] final judgment is one which operates to divest some right in such a manner as to put it beyond the power of the Court making the order to place the parties in their original condition after the expiration of the term [.]” Good, 201 S.C. at 32, 21 S.E.2d at 212. Although orders addressing venue or discovery that may be corrected after a final judgment are not immediately appealable, those orders that affect a substantial right are immediately appealable when the order ““in effect determines the action and prevents judgment from which an appeal might be taken[.]”” Hagood v. Sommerville, 362 S.C. 191, 195, 607 S.E.2d 707, 709 (2005). Accordingly, the South Carolina Supreme Court has held that “an order granting a motion to disqualify a party's attorney in a civil case affects a substantial right

and may be immediately appealed[.]” Id. at 197, 607 S.E.2d at 710; see also Tucker, 354 S.C. at 578, 582 S.E.2d at 407 (“[A] trial court should not require the disclosure of attorney client communications to other parties without first determining whether the communications are privileged by inquiring into all the facts and circumstances of the communication.”).

The Order’s prohibition on Appellant and Appellant’s counsel taking both specified and unspecified actions during depositions, including asserting attorney-client privilege and invoking the witness and the witness’ counsel’s right to discuss documents privately before the witness answers questions about them pursuant to Rule 30(j)(8), SCRCP, divests Appellant and Appellant’s counsel from being able to engage in discovery as intended by the South Carolina Rules of Civil Procedure. By prohibiting Appellant and Appellant’s counsel for taking such actions in the future, the Order effectively disqualifies Appellant’s attorney from representing Appellant in certain aspects of the instant action. Moreover, the prohibition leaves Appellant with no effective process for review.

As a result, the lower court’s order is effectively unreviewable if it is not reviewable now. As important as it is for the attorneys in this case to understand going forward the manner in which Rule 30(j)(8), SCRCP, should be applied, Appellants will have a difficult burden to show after trial and final judgment that the lower court’s ruling, if in error, is reversible. It will be difficult or impossible to prove that the Appellant’s inability to use Rule 30(j)(8), SCRCP, affected the final outcome of the case. As a result, the Order imposing these restrictions on Appellant’s and Appellant’s counsel’s conduct during depositions is immediately appealable.

IV. The proper interpretation of Rule 30(j)(8), SCRCP, constitutes an issue of significant interest and important legal principle about which the parties and South Carolina Bar need guidance

Although an order may not be immediately appealable, a South Carolina appellate court may address a novel issue in the interest of judicial economy. See Ex parte Wilson v. Pender, 367 S.C. 7, 14, 625 S.E.2d 205, 208 (2005). South Carolina appellate courts also have an interest in cases involving novel issues of significant public interest or legal principles of major importance. See Rule 204(b), SCACR. This includes the consideration of matters for the benefit of the South Carolina Bar. In re Anonymous Member of South Carolina Bar, 346 S.C. 177, 182, 552 S.E.2d 10, 12 (2001) (addressing attorney conduct in depositions in general for the benefit of the South Carolina Bar).

“Since depositions almost always occur without direct judicial supervision, lawyers must regulate themselves during this highly critical stage of litigation.” Id. at 188, 552 S.E.2d at 15. Accordingly, this is an area of interest for the South Carolina Bar. See e.g., Warren Moise, *Turnips and Trial Ethics*, 20-JUL S.C. Law. 10 (July 2008) (“The rules don’t specifically say whether providing and identifying documents in response to interrogatories and requests to produce satisfy this requirement.”) (attached Exhibit S). While the Supreme Court has previously addressed the proper interpretation of a portion of Rule 30(j)(8), SCRCP, no reported South Carolina opinion addresses whether merely identifying all documents produced, identified, or made available by any party during the course of discovery and those obtained pursuant to subpoena or records request comports with the intent of Rule 30(j)(8), SCRCP.

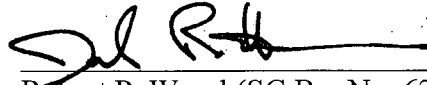
There is also conflict amongst courts interpreting the rule.⁴ The lower court's conclusion that this "identification" is sufficient effectively writes the rule out of existence. Following the court's ruling, Rule 30(j)(8), SCRCP, can be entirely circumvented by the simple expedient of identifying in every deposition notice all documents that have been produced in discovery—regardless of which documents counsel intends in good faith to use in the deposition. As a result, this Court should find that the order is immediately appealable to address the proper interpretation of Rule 30(j)(8), SCRCP. This court's guidance on this issue will be invaluable, not just to the parties herein, but to all attorneys in South Carolina.

V. There is an Immediately Appealable Order Before this Court and the Court, Therefore, Should Review the Totality of the Order

"[A]n order that is not directly appealable will nonetheless be considered if there is an appealable issue before the Court and a ruling on appeal will avoid unnecessary litigation." Ferguson v. Charleston Lincoln Mercury, Inc. 349 S.C. 558, 565 564 S.E.2d 94, 98 (2002). Accordingly, this Court should address all issues arising from the Order for judicial economy and full adjudication of these matters because there is at least a portion of the Order that is immediately appealable.

⁴ The United States District Court for the District of South Carolina has interpreted the similar language of Rule 30.04(H) of the Local Rules for the District of South Carolina to allow a deponent "a reasonable opportunity to review relevant documents that will be shown to him, with counsel, prior to a deposition[.]" Order at 2, Hoskins v. Snipes-King, No. 3:08-2442-JFA (D.S.C. July 6, 2009) (Entry No. 105) (attached Exhibit T). Accordingly, the District Court commented that "under the circumstances of this case, preparing within the limits of Fed. R. Civ. P. 30 to be questioned on over 3,000 documents is unworkable." Id. at 3. As a result, the District Court found that, "in light of the voluminous number of documents identified for the deposition, it is reasonable for [the deponent] and her counsel to be afforded a reasonable amount of time to review any document as necessary to determine whether the document or whether [the deponent]'s answers to questions on the document would be protected by a privilege." Id. at 3-4.

Respectfully submitted,



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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Maité Murphy, Circuit Court Judge

Appellate Case No. 2019-000671

Tammy C. Richardson,

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Halcyon Real Estate Services, LLP and
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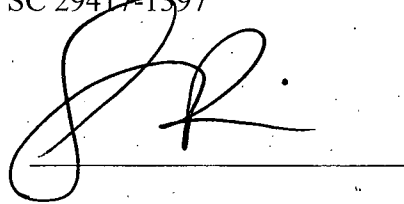
Appellant.

PROOF OF SERVICE

I, the undersigned employee of Rogers Townsend & Thomas, PC, hereby certify that I have, this 23rd day of May, 2019, served ***Appellant's Memorandum in Support of the Immediate Appealability of the Order Granting Plaintiff's Motion for Sanctions for Deposition Misconduct and Denying Defendant's Motions for Protection (Self and Gatling)*** by depositing a copy of the same in the U.S. Mail, postage pre-paid, upon the only other party to this appeal, addressed as indicated below:

Mary Leigh Arnold
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A handwritten signature in black ink, appearing to be 'JSK', is written over a horizontal line.

May 23, 2019

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

COURT OF COMMON PLEAS
CASE NO. 16-CP-18-1001

TAMMY C. RICHARDSON,

PLAINTIFF,

v.

HALCYON REAL ESTATE SERVICES, LLC AND
MCCABE, TROTTER & BEVERLY, P.C.,

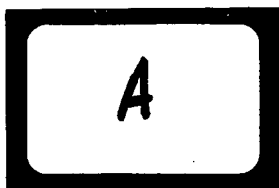
DEFENDANTS.

ORDER
GRANTING PLAINTIFF'S MOTION FOR
SANCTIONS FOR DEPOSITION
MISCONDUCT
AND
DENYING DEFENDANT'S MOTIONS FOR
PROTECTION (SELF AND GATLING)

On March 4, 2019, multiple motions came before the Court for a hearing, three of which concern conduct that occurred during two depositions.¹ Counsel for the parties were present at the hearing. Defendant McCabe Trotter & Beverly P.C. ("MTB") filed two motions seeking protection after defense counsel instructed the witnesses not to answer questions during their depositions: (1) Motion for Protective Order (Deposition of Haylen Gatling) filed January 21, 2019; and (2) Motion for Protective Order (Deposition of Sheri Self) filed January 31, 2019. Plaintiff filed a Motion and Memorandum in Support of Sanctions on February 7, 2019 concerning the conduct of MTB's counsel during those same depositions.

After carefully listening to the oral arguments of counsel, thoroughly reading all of the filings, including the relevant deposition transcripts and testimony cited, and after due consideration, the Court grants Plaintiff's Motion for Sanctions because of the conduct shown and the reasons stated in Plaintiff's Memorandum. This Court grants the relief sought and listed on page three of Plaintiff's Memorandum as explained herein and denies MTB's Motions for

¹ The other motions have been resolved by separate Order filed March 21, 2019.



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SC Court of Appeals

Protection (Self and Gatling). In addition, attorney's fees and costs incurred by Plaintiff for the prior depositions (Self and Gatling) and the subsequent depositions to take place (Sheri Self, Haylen Gatling and Stephanie Trotter, Esq.) are awarded to Plaintiff. The Court's decision is based on its findings of fact and conclusions of law as follows:

I. PRESCRIBED CONDUCT DURING DEPOSITIONS.

The conduct of attorneys during the course of depositions is set forth in SCRCP, Rule 30, and particularly in *In the Matter of Anonymous Member of the South Carolina Bar*, 346 S.C. 177, 552 S.E.2d 10 (2001).

The South Carolina deposition conduct rules boil down to "if you can't do it in front of a judge, you shouldn't do it in a deposition." The Supreme Court has warned lawyers their conduct in depositions can result in ethical violations and sanctions. *In re Anonymous Member of S.C. Bar*, 346 S.C. 177, 552 S.E.2d 10 (2001). South Carolina adopted deposition conduct rules derived from *Hall v. Clifton Precision*, 150 F.R.D. 525 (E.D. Pa. 1993). Having adopted the *Hall* approach, our Court requires attorneys to operate under one of the most sweeping and comprehensive rules on deposition conduct in the nation. *In re Anonymous Member of S.C. Bar*, at 190, 16.

Prohibited conduct includes off-the record conferences, suggestive objections and interjections and unauthorized instructions not to answer. There are various additional contempt powers available to the trial court when counsel violates the Rules.

In addition to their traditional contempt powers, judges may issue orders as a sanction for improper deposition conduct: (1) specifying that designated facts be taken as established for purposes of the action; (2) precluding the introduction of certain evidence at trial; (3) striking out pleadings or parts thereof; (4) staying further proceedings pending the compliance with an order that has not been followed; (5) dismissing the action in full or in part; (6) entering default judgment on some or all the claims; or (7) an award of reasonable expenses, including attorney fees. *Id.* Among the costs a

judge may deem appropriate could be those incurred for future judicial monitoring of depositions or payment for the retaking of depositions. Our judges must use their authority to make sure that abusive deposition tactics and other forms of discovery abuse do not succeed in their ultimate goal: achieving success through abuse of the discovery rules rather than by the rule of law.

Id. at 194, 18. Attorneys who cross the line during a deposition, do not promote the “just, speedy, and inexpensive determination of every action.” *Id.*

During a deposition, the only permissible discussion between counsel and a witness that may take place *if it does not involve deciding whether to assert privilege* is to discuss a previously undisclosed document. *In re Anonymous Member of S.C. Bar*, at 190-191, 16. (emphasis added).

The law is clear: Conferences called to assist a witness in framing an answer, to calm down a nervous client, or to interrupt the flow of a deposition are improper and warrant sanctions. *In re Anonymous Member of S.C. Bar*, at 191, 17. If there is a permissible basis for meeting with the witness, “[b]efore beginning such a conference, the deponent’s attorney should note for the record that a break is needed to discuss the possible assertion of a privilege or a newly produced document.” *In re Anonymous Member of S.C. Bar*, at 191, 16. When there is an off-the-record conference, whether or not a privilege is asserted, deposing counsel may inquire on the record into the subject of the conference to determine if there has been any witness coaching. *In re Anonymous Member of S.C. Bar*, at 191, 16.

Further, an attorney cannot object to a question just because the attorney does not understand the question. *See Hall*, 150 F.R.D. at 530 n. 10 adopted and approved by *In re Anonymous Member of S.C. Bar*. It is improper for counsel to state for the record their interpretations of questions, since such interpretations are completely irrelevant and improperly suggestive to the deponent. *Id.* A

witness's attorney must also refrain from rephrasing questions for the witness. *In re Anonymous Member of S.C. Bar*, at 192, 17.

II. IMPROPER OBSTRUCTIVE BEHAVIOR OCCURRED DURING THE DEPOSITIONS.

During the depositions of Haylen Gatling (Gatling) and Sheri Self (Self), MTB counsel repeatedly interrupted the flow of the deposition and stopped to engage in prohibited off-the-record discussions with the witnesses regarding previously produced documents. When the witness was presented with a previously produced document, MTB counsel would stop the deposition and take the witness outside the room to discuss the document off the record. Neither before leaving nor after returning did MTB counsel state a valid privilege was being asserted as to the document. There was no valid reason as to why the off-the-record conferences occurred. When the witness returned, Plaintiff's counsel, as is allowed, would inquire of the witness what transpired off the record. MTB's counsel would instruct the witness not to answer. During the Self deposition, MTB counsel stopped the deposition for off the record conferences approximately 15 times and instructed the witness not to answer questions approximately 24 times. An example of the improper conduct appears in the deposition of Self on page 194. (emphasis added)

5 BY MR. KAHN:

6 Q Do you see on the second page where your
7 initials appear?

8 MR. COUNTRYMAN: Going to talk to her about
9 this before she answers any questions on it. If you
10 have anything else you want me to go over with her, I'm
11 happy to do that since --

12 MR. KAHN: I don't think the rules require
13 that. I think what you're doing is improper. So we
14 can --

15 MR. COUNTRYMAN: That's fine. But I'm doing

16 it. So I'm telling that ahead of time. If you want me
17 to go over them with -- with her now, I'll do that. If
18 not, then you can waste more time doing it over the
19 next 30 minutes. That's fine.

An example of the effects of the improper off-the-record discussions and witness coaching involve the change in testimony of Gatling after meeting with defense counsel and Stephanie Trotter, Esq. (Trotter) of MTB who attended Gatling's deposition. Prior to an off the record meeting, as to the MTB collection process, Gatling testified she printed documents, including various parts of a form letter package and "would pull two of the pages, the notice of lien and the witness page" and put those in a box with others for Trotter to review. Dep. Gatling p. 175, 17-23; p. 176, 2-6. After improperly meeting with MTB counsel and Trotter to discuss documents, the witness returned and testified she had suddenly "misremembered" the way documents were put in the box for the MTB attorney Trotter to sign. Gatling Dep. pp. 199-200. The impropriety of the meetings was noted on the record. *See, e.g.* Gatling Dep. pp. 182-187. When Plaintiff's counsel asked what was discussed, the witness was improperly instructed not to answer by MTB counsel.

Other portions of the depositions in Plaintiff's Motion further illustrate improper conduct.

It is clear to the Court that MTB counsel repeatedly violated the standards for deposition conduct and engaged in prohibited conduct to further the goal of disrupting and impeding the discovery process in at least the following ways:

1. Repeatedly stopping the depositions to engage in off-the-record discussions that involved witness coaching;
2. Repeatedly stopping the depositions to discuss documents with the witnesses even though the documents had been previously identified or produced in discovery;

3. Failing to state a permissible reason for interrupting the depositions such as whether a privilege would be asserted for a particular document and the results of such discussion; and
4. Instructing the witnesses not to testify as to what was discussed during the prohibited off the record meetings.

These actions are prohibited and cannot be tolerated. Defense counsel's conduct frustrated the truth seeking function of the depositions and tainted the witnesses.

III. IMPROPER INSTRUCTION FOR DEPONENT TO LEAVE UNCONCLUDED DEPOSITION.

Another example of improper conduct involves MTB's counsel improperly ending the out of state deposition of Self, a former employee of MTB, for no legitimate reason. Plaintiff's counsel travelled to Macon, Georgia and was in the middle of questioning the witness about documents she created and MTB's collection process. MTB's counsel announced, "This deposition is over." Self Dep. p. 224. Plaintiff's counsel objected. MTB's counsel instructed the witness to leave. Self Dep. pp. 224-225. This conduct clearly interfered with the deposition and frustrated the truth seeking function of the discovery process. This behavior should not and will not be tolerated. Thus, MTB and its counsel will make Sheri Self available for the continuation of her deposition.

IV. IMPROPER CONDUCT CANNOT BE ALLOWED AND SANCTIONS ARE WARRANTED.

Actions taken in a deposition designed to prevent justice, delay the process, or drive up costs are improper and warrant sanctions. *In re Anonymous Member of S.C. Bar*, at 194, 18. Depositions are widely recognized as one of the "most powerful and productive" devices used in discovery. See A. Darby Dickerson, *The Law and Ethics of Civil Depositions*, 57 Md. L. Rev. 273, 277 (1998). "Depositions are the factual battleground where the vast majority of litigation actually takes place." *Hall*, 150 F.R.D. at 531. Since depositions are so important in litigation, attorneys face great temptation to cross the limits of acceptable behavior in order to win the case at the expense of their ethical responsibilities to the court and their fellow attorneys. When attorneys

cross the line during a deposition, their actions do not promote the "just, speedy, and inexpensive determination of every action." *See* Rule 1, SCRPC and *In re Anonymous Member of S.C. Bar*, 346 S.C. 177, 193, 552 S.E.2d 10, 18 (2001).

It has been shown that MTB's counsel acted willfully and in bad faith. Their conduct is prejudicial to the Plaintiff as it would be to any other party in that it promotes witness coaching, the alteration of free and voluntary testimony and blocks the search for the truth via proper inquiry. Further prejudice has been shown in the form of expenditure of costs and wasted time of deposing counsel and the witnesses. There is a clear need to deter this conduct in the future and to protect against discovery abuse.

V. ORDERED RELIEF - SANCTIONS

Based on the determinations and findings herein, the Court orders the following relief:

1. The depositions of MTB employees Gatling and former employee Self are to be reconvened and continue so the depositions can be conducted and completed unimpeded. Further, the witnesses are to answer questions concerning the matters discussed during off the record conferences with MTB's counsel and Stephanie Trotter. MTB's counsel is not to instruct the witnesses not to respond to questions regarding the off the record conferences. MTB shall make the witnesses available at a time, place and date convenient to Plaintiff's counsel within 20 days of the date of this Order or at such other date, time and place as may be agreed upon by Plaintiff's counsel. MTB is required to pay the costs of these depositions to be taken.
2. Stephanie Trotter's deposition will be conducted and completed unimpeded. Further, she is to answer questions concerning discussions during the improper off the record conferences with MTB's counsel. The deposition will take place at a time, place and date convenient to Plaintiff's counsel within 20 days of the date of this Order or at such other date, time and place

as may be agreed upon by Plaintiff's counsel. MTB is required to pay the costs of this deposition.

3. MTB's counsel shall cease and desist from the prohibited behavior discussed herein.
4. MTB is to pay attorney's fees and costs of the depositions taken and to be taken as follows:
 - a) As to the prior depositions of Gatling and Self, based on the times set forth in the filed depositions, the Court notes that Gatling's deposition took approximately 8 hours 25 minutes. Self's deposition took approximately 4 hours and 45 minutes. The record further reflects that both Mr. Kahn and Ms. Arnold attended and participated in those depositions. The total time of the depositions was approximately 13.20 hours.
 - b) The Court has reviewed the affidavits of Plaintiff's counsel submitted concerning their qualifications, experience in litigation and in handling various legal matters. The Court finds that the nature, extent and difficulty of the legal services rendered in coordinating, preparing and taking the depositions in this class action matter warrant the amount of attorney's fees stated herein. The professional standing of counsel is known to the Court and reflected in the affidavits submitted. Both Mary Leigh Arnold and Justin S. Kahn have handled various kinds of complex civil litigation and appeals in state and federal courts for more than 25 years each. As to the contingency of compensation, in this dispute, the Court finds that the rate stated herein to take the depositions of these witnesses in the context of this class action lawsuit is proper. As to the fee charged in the locality for similar services, the Court is aware of and of the opinion that this hourly rate is in line for attorneys of similar background and experience. Last, the attorneys have obtained beneficial results by successfully arguing and prevailing on the motions before the Court. As to these depositions, the Court finds Plaintiff's counsel are entitled to be compensated at the reasonable hourly rate stated below.
 - c) MTB is to pay Plaintiff's counsel at the rate of \$ 250 per hour for a total of \$ 6,600. This is calculated as follows: 13.20 hours x 2 attorneys x \$ 250 per hour. These fees are to be paid to Plaintiff's counsel within fifteen (15) days of the filing of this Order (time spent in travel and preparation of those depositions is neither being requested nor awarded).

- d) As to the depositions of Gatling, Self and Trotter to be reconvened pursuant to this Order, Plaintiff's counsel shall file with the Court within fourteen (14) days of the completion of those depositions an affidavit stating the total time expended for taking those depositions. Defendant shall then have fifteen (15) days after the filing of the affidavit to pay the total time of the depositions for each of Plaintiff's counsel at the rate per hour stated herein (again preparation and travel time for those depositions is neither being requested or awarded).
- e) The Court has reviewed the affidavits of Plaintiff's counsel. It shows the costs of the depositions of Self and Gatling are \$4,265.50. These costs are to be paid by MTB to Plaintiff's counsel within fifteen (15) days of the filing of this Order.

AND IT IS SO ORDERED!

Maite Murphy
Judge, First Judicial Circuit

April __, 2019



Dorchester Common Pleas

Case Caption: Tammy C Richardson , plaintiff, et al VS Halcyon Real Estate
Services LLC , defendant, et al
Case Number: 2016CP1801001
Type: Order/Sanctions

So Ordered

s/ Maite Murphy 2166

FORM 4

**STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER
IN THE COURT OF COMMON PLEAS**

**JUDGMENT IN A CIVIL CASE
CASE NUMBER 2016CP1801001**

Tammy C Richardson

FILED-RECORDED
2018 JAN 12 AM 11:57

Halcyon Real Estate Services LLC

McCabe Trotter &
Beverly P C

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for: ☐ Plaintiff ☐ Defendant
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit);
☐ Rule 43(k), SCRCP (Settled); ☐ Other: _____
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j) SCRCP; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other: _____
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other: _____

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

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

ORDER INFORMATION

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

INFORMATION FOR THE JUDGMENT INDEX

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

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

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

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

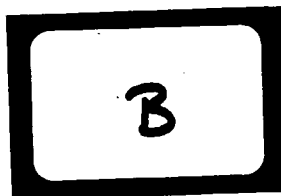
Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

Diane S. Goodstein
Circuit Court Judge

2112
Judge Code

1/12/2018
Date



For Clerk of Court Office Use Only

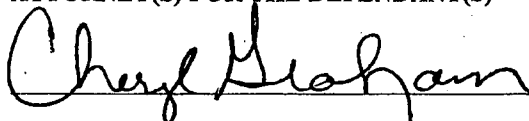
This judgment was entered on **1/12/2018**, and a copy mailed first class or placed in the appropriate attorney's box on **1/12/2018**, to attorneys of record or to parties (when appearing pro se) as follows:

Mary Leigh Arnold 749 Johnnie Dodds Blvd, Ste B Mt.
Pleasant, SC 29464
Justin S. Kahn
Wes Baker Allison PO Box 31397 Charleston, SC
29417-1397

Andrew W. Countryman 321 Wingo Way Suite 102 Mount
Pleasant, SC 29464
Kevin W. Mims /Randell Croft Stoney III 50 Immigration
Street, Suite 200 Charleston, SC 29403
Robert P. Wood PO Box 100200 Columbia, SC 29202-3200

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)



Court Reporter

Cheryl Graham - Clerk of Court

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

Clerk also emailed a copy to all counsel listed above on 1/12/2018

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

FILED-RECORDED
2018 JAN 12 AM 11:57

IN THE COURT OF COMMON PLEAS
CASE No. 2016-CP-18-1001

Tammy C. Richardson,

Plaintiff,

v.

Halcyon Real Estate Services, LLC and
McCabe Trotter & Beverly, P.C.,

Defendants.

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

**ORDER
GRANTING
CLASS CERTIFICATION**

Plaintiff, Tammy C. Richardson, (hereinafter "Plaintiff") filed a Motion for Class Certification against McCabe, Trotter & Beverly, P.C. on March 9, 2017. The Motion was heard April 10, 2017 with supplemental arguments on July 13, 2017. Justin S. Kahn and Mary Leigh Arnold, appeared on behalf of Plaintiff and all those similarly situated. Andrew Countryman, and Robert Wood appeared on behalf of Defendant McCabe, Trotter & Beverly, P.C. (MTB).

A central issue is whether MTB misrepresents the debt that property owners owe their HOAs in violation of the Fair Debt Collections Practices Act (FDCPA).

Having duly considered the filings, memoranda, exhibits and arguments of counsel this Court finds class certification should be granted as set forth below.

I. Background

A. Brief Procedural History.

- August 8, 2015 MTB filed suit to collect and foreclosure on behalf of Southern Magnolia Homeowners Association ("SMHOA") against Tammy Richardson ("Richardson") to collect for alleged past due homeowner association fees and expenses. Civil Action No. 2015-CP-18-1575 ("HOA Foreclosure").
- September 9, 2015 Richardson filed an Answer and Counterclaim against SMHOA.
- October 15, 2015 MTB filed a Reply to Counterclaim on behalf of SMHOA.
- November 5, 2015 Richardson filed a Third Party Complaint against MTB alleging violations of

the FDCPA.

- November 23, 2015 MTB filed an Offer of Judgment and a Motion to Dismiss the Third Party Complaint.
- December 21, 2015 MTB filed an Answer to the Third Party Complaint.
- January 19, 2016 Judge Edgar Dickson heard MTB's Motion to Dismiss.
- June 1, 2016 Judge Edgar Dickson denied MTB's Motion to Dismiss. He also severed the FDCPA claim against MTB from the Foreclosure Action, resulting in this separate lawsuit.
- June 3, 2016 MTB removed the FDCPA claim to U.S. District Court. Plaintiff sought remand.
- July 20, 2016 an order was issued remanding this case.
- November 14, 2016 MTB filed a Motion for Partial Summary Judgment.
- January 19, 2017 a stipulation of dismissal was filed in the SMHOA foreclosure case and Richardson received compensation from SMHOA.
- March 9, 2017 Richardson filed a Motion for Class Certification.
- April 10, 2017 Judge Alison Renee Lee granted in part and denied in part MTB's Motion for Partial Summary Judgment.
- April 14, 2017, at a hearing on Richardson's Motion for Class Certification, this Court continued the matter pending further information regarding Judge Lee's Order.
- May 4, 2017 Judge Lee filed an Order clarifying her prior Order.
- July 13, 2017 the hearing on Richardson's Motion for Class Certification was reconvened with both sides presenting additional arguments.

B. Factual Background.

MTB is a South Carolina law firm that collects debts on behalf of homeowner associations throughout South Carolina. MTB filed suit on behalf of SMHOA in August 2015, seeking to foreclose Ms. Richardson's home to collect alleged delinquent homeowner association fees and expenses. That lawsuit resolved with SMHOA paying Richardson a settlement. The president of SMHOA also provided a

letter stating Ms. Richardson had done nothing wrong.

Richardson has sued MTB for alleged violations of the FDCPA.

MTB has a standard fee agreement with homeowner associations ("HOA") with a fee schedule flow chart listing steps and fees that typically apply in collection matters. Trotter Dep. p. 58, 13-16. When MTB contracts with an HOA to collect amounts allegedly owed, MTB bills the HOA a flat rate as set forth on the flow chart. The chart states "Total Fees to Association: \$65." Trotter Dep. p. 71, 15-19 referencing Ex. 3 Fee Schedule.

Each time an HOA contacts MTB to collect, MTB gets the account from the HOA and adds attorney's fees to the amount provided by the HOA. Trotter Dep. p. 93, 22-25, p. 94, 1. MTB sends its form "Right to Cure Notice" that is intended to tell the consumer "that they currently owe certain amounts." Trotter Dep. p. 95, 7-8. It is alleged that MTB has been sending letters to consumers claiming amounts greater than what MTB bills the HOA since at least 2012. Trotter Dep. p. 167, 3-13. Richardson claims that MTB also files a notice of lien that includes the inflated amount as well. MTB agrees that the Right to Cure letter does not distinguish between what MTB states is owed and what the HOA account actually reflects. Trotter Dep. p. 96, 5-7.

MTB sends the Right to Cure and a Notice of Lien claiming that the HOA member currently owes amounts greater than and not appearing on the actual HOA account. Trotter Dep. p. 52, 9-22. MTB agrees that the HOA account does not reflect the attorney's fees as set forth on the letter it sends to the consumer. Trotter Dep. p. 97, 15-18; p. 98, 1-6; p. 99, 15-21. MTB agrees that the consumer "would rightfully believe that they currently owe those amounts. That's what the [Right to Cure] letter says." Trotter Dep. p. 96, 11-13.

In sum, Plaintiff contends MTB repeatedly violated the FDCPA when sending its "Right to Cure Notice" and filing Notice of Liens against homeowners' property that misrepresent the amount of the debt. Plaintiff's Memo in Support of Class Certification p. 18.

II. Standard For Class Certification.

It is well settled in South Carolina that “Rule 23, SCRCP, endorses a more expansive view of class action availability than its federal counterpart.” *Salmonsens v. CGD*, 377 S.C. 442, 455, 661 S.E.2d 81, 88 (2008). “The class-action device saves the resources of both the courts and the parties by permitting an issue potentially affecting every [class member] to be litigated in an economical fashion under Rule 23.” *Grazia v. South Carolina State Plastering, LLC*, 390 S.C. 562, 576, 703 S.E.2d 197, 204 (2010).

Our Supreme Court has made it clear that “class actions are favored in this state.” *Id.*

Our state class action rule differs significantly from its federal counterpart. The drafters of Rule 23, South Carolina Rules of Civil Procedure (SCRCP) intentionally omitted from our state rule the additional requirements found in Federal Rule 23(B), Federal Rules of Civil Procedure (FRCP). By omitting the additional requirements, Rule 23, SCRCP, endorses a more expansive view of class action availability than its federal counterpart.”

Id., citing, *Littlefield v. South Carolina Forestry Comm'n*, 337 S.C. 348, 354-55, 523 S.E.2d 781 (1999).

Reliance on federal court cases interpreting Rule 23, FRCP that are inconsistent with our Rule 23, SCRCP are inappropriate.

When considering a motion to certify a class action, this Court “may not look to the merits when determining whether to certify a class.” *King v. American General Finance, Inc.*, 386 S.C. 82, 88, 687 S.E.2d 321, 324 (2009).

Thus, it is clear that class actions are favored and the merits are not to be considered when certifying a class. The focus is simply whether the prerequisites of Rule 23 have been met. The analysis for this is below.

III. Analysis.

A. The Requirements for Class Certification Are Satisfied.

“Upon a motion for class certification, it will be incumbent on the circuit court to determine whether or not the action meets each of the five prerequisites proponents of class certification are required to prove.” *Grazia v. SC State Plastering, LLC*, 390 S.C. 562, 575-76, 703 S.E.2d 197, 204 (2010). “The

prerequisites are: 1) the class must be so numerous that joinder of all members is impracticable; 2) there must be questions of law or fact common to the class; 3) the claims or defenses of the representative parties must be typical of the claims or defenses of the class; 4) the representative parties must fairly and adequately protect the interests of the class; and 5) the amount in controversy must exceed one hundred dollars for each member of the class.” *Id.* Here, the requirements of Rule 23, SCRCP are satisfied. Further, as discussed herein, the requirements for certifying a class under South Carolina rules are less restrictive than the Federal Rules.

1) Rule 23(a)(1) – Numerosity.

Rule 23(a)(1), SCRCP, requires the class to be so numerous that joinder of all members is impracticable. Plaintiff asserts that MTB has produced 470 Right to Cure letters for just Dorchester and Charleston Counties. Defendant does not dispute that the numerosity element is met in this matter. It appears that at least hundreds of letters and communications were sent by MTB that are at issue. Thus, numerosity is satisfied.

2) Rule 23(a)(2) – Commonality – Individual Issues Do Not Defeat

Rule 23(a)(2), SCRCP requires a showing of the existence of “questions of law or fact common to the class.” SCRCP, 23(a)(2).

“The essence of a class action is common questions of law and fact and Rule 23(a)(2) reflects this. It is important to note that the subsection does not demand that all questions of law and fact be common, only that there be common issues among the class. In fact, *a single common issue will suffice if it is important enough*. It also follows that *the mere existence of individual issues does not defeat class action status*. There is no qualitative or quantitative test in the Rule. Ultimately, commonality is a judgment that the issues are sufficiently similar so that the class action will be a more efficient means of resolving the problem, even though some individual issues may be litigated in any event.”

McGann v. Mungo, 287 S.C. 561, 568, 340 S.E.2d 154, 157 (Ct. App. 1986) *citing* H. Lightsey & J. Flanagan, South Carolina Civil Procedure at 198 (2d ed. 1985) (emphasis added). Further, in *McGann v. Mungo*, the Court looked merely to the pleadings and the amended complaint, to determine there were common questions of law and fact. *Id.* at 568, 158.

MTB agrees that when it sends the Right to Cure letter to the consumer the greater amount listed for attorney's fees is not on the homeowner's account and is greater than what MTB bills the homeowner association. *See Trotter Dep. p. 52, 9-22; p. 167, 3-13.* In an attempt to suggest there are too many individual issues to certify a class, MTB suggests there may be different covenants that relate to each HOA. However, Plaintiff argues that a review of each covenant is unnecessary. For example, one need only to look at the MTB fee schedule which states "Total Fees to Association: \$65" (Trotter Dep. Ex. 3 Fee Schedule) and compare that to the amount stated in the "Right to Cure" letter to see that MRB is overstating amounts owed. Similarly, one can look at the Notice of Lien to determine that a higher amount is claimed than what MTB states will be the "Total Fees to Association." *Id.*

Further, MTB agrees:

- No covenants authorize a sum certain attorney's fees. Trotter Dep. p. 21, lines 13-19;
- MTB cannot tell a consumer incorrect HOA balances. Trotter Dep. p. 110, 23-25;
- Providing a consumer with incorrect balances violates the FDCPA. *Id.* at p. 118, 17-20.
- MTB has not seen any covenants that require a homeowner to pay whatever amount of attorney's fees are charged by MTB. Trotter Dep. p. 76, 10-14.

Despite these admissions by MTB, there is no evidence that any variation of covenants will create issues that make a class action unmanageable.

Further, even a single common issue will suffice if it is important enough to certify a class and the mere existence of individual issues does not defeat class action status.

Here, the questions of fact and law in this litigation are identical among the class members. A common issue is whether MTB's Right to Cure Letter and filing of a lien in an attempt to collect a debt violated the FDCPA. More specifically, common issues and questions could include:

- 1) whether MTB's form letter stating what a consumer "currently" owes is a violation of the FDCPA by misrepresenting the amount of the debt;
- 2) whether MTB misrepresented the amount of debt owed by a consumer by including in its collection letters amounts greater than what MTB states are the "Total Fees to

Association”;

- 3) whether MTB’s form collection letters falsely represent the nature, character or amount of the debt in violation of the FDCPA;
- 4) whether MTB’s communications to class members fail to properly state “the amount of the debt” as required by 15 U.S.C. §1692g(a)(1);
- 5) whether telling a consumer s/he is required to pay amounts pursuant to the “governing documents” of the HOA, when MTB admits its collection contract is not a governing document (Trotter Dep. p. 54, 2-16) and no governing documents authorize a sum certain attorneys fee (Trotter Dep. p. 21, 13-19); and
- 6) whether using the “notice of consumer’s right to cure” language contained within the South Carolina Consumer Protection Code then failing to comply with those provisions by charging more attorney’s fees than allowed under that statute is a FDCPA violation.

The Court finds there are common questions of law and fact such that the requirements of Rule 23(a)(2) are satisfied.

c) Rule 23(a)(3) – Typicality.

Rule 23(a)(3) requires that the claims of the class representation be “typical of the claims of the class.” SCRCP, Rule 23(a)(3). “A plaintiff’s claim is typical if it arises from the same event, practice, or course of conduct that gives rise to the claims of other class members and if his or her claims are based on the same legal theory...The test for typicality is not demanding and ‘focuses on the similarity between the named plaintiffs’ legal and remedial theories and the theories of those whom they purport to represent...However, the plaintiffs’ claims need not be identical to those of the class; typicality will be satisfied so long as ‘the named representatives’ claims share the same essential characteristics as the claims of the class at large.’” *Newberg on Class Actions* §3:29 (5th Ed. 2016). Further, “the plaintiffs’ claims need not be identical to those of the class; typicality will be satisfied so long as “the named representatives’ claims share the same essential characteristics as the claims of the class at large.” *Id.*

Here, multiple allegations share the same characteristics as the claims of the class at large, including but not limited to: MTB's alleged practice or course of conduct in sending written communications to homeowners stating amounts as being currently owed to the homeowner association when they are not; and billing the HOA one amount for attorney's fees while telling the homeowner a different amount is owed.

Plaintiff has presented facts and testimony that further supports the allegations needed to show the typicality requirement. These include the following:

- The "Notice of Consumer's Right to Cure" letter is typical of the right to cure letters that are sent by MTB. Trotter Dep. p. 41, 9-12;
- When MTB sends the "Notice of Consumer's Right to Cure" letter to the consumer, it includes an amount for attorney's fees that exceeds the amount billed to the HOA. Trotter Dep. p. 167, 3-13; and
- MTB has engaged in that conduct since the firm started. *Id.*

These kinds of allegations and testimony support the argument that the claims are typical and arise out of MTB's common course of conduct.

The threshold for establishing typicality is low. As described above, Plaintiff's claims arise out of a common course and pattern of alleged wrongdoing by MTB. Richardson's claim is typical of the class in many ways including because it is brought pursuant to the FDCPA and involves the same course of conduct of asserting in writing incorrect amounts are allegedly owed. The fact pattern is the same with respect to all class members, and the same legal theory is asserted on behalf of all. Accordingly, the typicality requirement has been satisfied.

d) Rule 23(a)(4) – Adequacy of Representation.

"[T]he adequacy requirement focuses on the desired attributes of those who seek to represent the class as opposed to the characteristics of the class." *Newberg on Class Actions* §3:50 (5th Ed. 2016). The

adequacy of representation requirement “ensures that the class’s champion will pursue its interests sufficiently well so as to produce a judgment that can fairly bind all members of a group who cannot appear before the court individually.” *Id.* “In determining whether a particular named plaintiff will adequately represent a proposed class pursuant to Rule 23(a)(4) one factor we must consider is whether the named plaintiff has interests that are antagonistic or adverse to those of the rest of the class... The kind of antagonism that will defeat the maintenance of a class action is the kind which relates to the subject matter in controversy, as when the named representative has a claim which conflicts with the economic interests of the class. The issue of whether a named plaintiff will adequately protect the interests of the class members is a question of fact which depends upon the circumstances of each case.” *Waller v. Seabrook Island Property Owners Ass’n*, 300 S.C. 465, 468, 388 S.E.2d 799, 801 (1990) (citations omitted). Thus, the class representative should not have any significant antagonistic or conflicting interests to the unnamed members and it must appear that the class representative will vigorously prosecute the interests of the class through qualified counsel.

Here, the facts show that Ms. Richardson's claims are not adverse or antagonistic to the class. As to her adequacy, has previously and successfully litigated against the homeowner association that was represented by MTB when the HOA tried to foreclose her home claiming she owed money that she argued she did not owe. That matter resulted in her challenging the lawsuit, the homeowner association paying her money and the president of the association writing a letter stating she did nothing wrong. It appears to the Court that the class representative accepts and understands her duties toward all the members of the putative class and she will make an adequate representative.

The adequacy of Plaintiff’s counsel must also be satisfied. “Adequacy of counsel asks whether the attorneys who seek to represent the class are competent to do the job.” *Newberg on Class Actions* §3:54 (5th Ed. 2016). The Court is satisfied that Plaintiff’s counsel satisfies the necessary factors and this has not been challenged by MTB. Plaintiff’s counsel has also demonstrated that they will and have vigorously prosecuted this matter.

Plaintiff has satisfied the element of adequacy and she and her counsel will fairly and adequately

protect the interests of the class.

e) Rule 23(a)(5) – Amount in Controversy.

Rule 23(a) (5), SCRCF provides that: “in cases in which relief primarily is sought is not injunctive relief or declaratory with respect to the class as a whole, *the amount in controversy* exceeds one hundred dollars for each member of the class.” (emphasis added). Here, in each matter at issue, MTB seeks an amount greater than \$100. The proposed class seeks statutory damages and actual damages pursuant to the FDCPA. The FDCPA is a strict liability statute that provides for statutory damages “not exceeding \$1,000.00...” plus attorney’s fees. 15 U.S.C. §1692(k)(a)(2)(A). *See, e.g. Welker v. Law Office Of Daniel J. Horwitz*, 699 F. Supp. 2d 1164, 1171 (S.D. Cal. 2010). Thus, given the debt claimed owed by MTB and the potential statutory damages of up to \$1,000, the amount in controversy exceeding \$100 for each member of the class is satisfied.

This Court finds that Plaintiff has established that the amount in controversy for each class member exceeds \$100 and has been met.

IV. Class Definition

The certified class is defined as:

All individuals who owned South Carolina real property who were sent a document by McCabe, Trotter & Beverly, P.C. attempting to collect a debt for a homeowner or community association during the following period: November 5, 2014 (representing the date one year prior to the filing of Plaintiff Richardson’s Third-Party Complaint) through January 11, 2016.

Excluded from the Class are individuals who are or were during the Class period officers, directors or employees of MTB and all consumers who file a timely and proper request to be excluded from the Class.

THEREFORE IT IS ORDERED that Plaintiff’s Motion for Class Certification is granted and that the certified class is defined as above; and it is

FURTHER ORDERED that Plaintiff’s motion to appoint Plaintiff’s counsel, Justin S. Kahn and

Mary Leigh Arnold as counsel for the aforementioned class is granted; and it is

FURTHER ORDERED that the notice shall be given to the class members in a form and manner to be determined by the Court upon application by Plaintiff.

AND IT IS SO ORDERED.



Honorable Diane Schaffer Goodstein

St. George, S.C.
January 11, 2018

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
C.A. No. 16-CP-18-1001

TAMMY C. RICHARDSON,
PLAINTIFF,

v.

HALCYON REAL ESTATE
SERVICES, LLC AND MCCABE,
TROTTER & BEVERLY, P.C.,
DEFENDANTS.

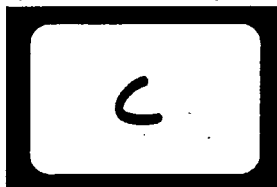
PLAINTIFF'S NOTICE OF
VIDEOTAPED DEPOSITION OF
HAYLEN GATLING

TO: ANDREW W. COUNTRYMAN, ESQ. AND ROBERT P. WOOD, ESQ.,
ATTORNEYS FOR DEFENDANT MCCABE TROTTER & BEVERLY, P.C.:

PLEASE TAKE NOTICE that Plaintiff, pursuant to the South Carolina Rules of Civil Procedure and other law, will take the video deposition of the witness described below, at the date, time and place stated or at such other time and place as may be agreed upon, before a person authorized to administer oaths. This deposition may be used for all purposes allowed by the rules.

Name of Witness:	Haylen Gatling
Time and Date:	10:00 a.m., January 15, 2019
Place:	Rogers Townsend & Thomas, PC 1221 Main Street, 14 th Floor Columbia, SC 29202

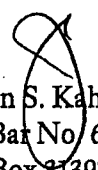
PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(j)(8), SCRCP, counsel for the Plaintiff hereby identifies and reserves the right to use any documents produced or made available in discovery by any party during this deposition, and hereby gives notice of the Plaintiff's intent to question the witness regarding all documents produced, identified or made available by



any party during the course of discovery, as well as those obtained pursuant to subpoena or records request.

Further, pursuant to Rule 45, the witness is commanded to produce all documents or materials reviewed by her to prepare for the deposition by January 10, 2019 as set forth in the attached subpoena.

KAHN LAW FIRM, LLP


Justin S. Kahn
SC Bar No. 65100
PO Box 31397
Charleston, SC 29417-1397
p. 843.577.2128
f. 843.577.3538
jskahn@kahnlawfirm.com

MARY LEIGH ARNOLD, PA

Mary Leigh Arnold
SC Bar No. 419
Sammie@maryarnoldlaw.com
Mary Leigh Arnold, P.A.
749 Johnnie Dodds Blvd., Ste. B
Mt. Pleasant, SC 29464
p. 843.971.6053
f. 843.971.6055

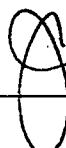
**ATTORNEYS FOR TAMMY C.
RICHARDSON**

Charleston, S.C.
November 9, 2018

CERTIFICATE OF SERVICE

A copy of the foregoing was served on Defendant McCabe Trotter & Beverly through their counsel, by Email and U.S. Mail on November 9, 2018, in the manner prescribed by the applicable Rules of Civil Procedure.

Signed: _____



STATE OF SOUTH CAROLINA

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF RICHLAND

Tammy C. Richardson, Plaintiff

v.

SUBPOENA IN A CIVIL CASE

McCabe, Trotter & Beverly, P.C., et al., Defendant

Case Number: 2016-CP-18-1001

Pending in Dorchester County

TO: Haylen Gatling c/o Andrew Countryman, Esq., Countryman Law Firm, 321 Wingo Way, Ste. 102, Mt. Pleasant, SC
☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME , AM

X YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION Rogers Townsend & Thomas, PC 1221 Main St., 14 th Floor, Columbia, SC 29202	DATE AND TIME Jan. 15, 2019, 10:00 AM
--	---------------------------------------

X YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects:

See accompanying Deposition Notice for documents requested to be produced.

PLACE Kahn Law Firm, PO Box 31397, Charleston, SC 29417	DATE AND TIME Jan. 10, 2019, 10:00 AM
--	---------------------------------------

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME , AM
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ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Attorney/Issuing Officer's Signature Indicate if Attorney for Plaintiff or Defendant Attorney's Address and Telephone Number: Justin S. Kahn, SC Bar 65100, Attorney for Plaintiff, Kahn Law Firm, LLP, POB 31397, Charleston, SC 29417, p: 843.577.2128, F: 843.577.3538	November 9, 2018 Date	Justin S. Kahn Print Name
--	--------------------------	------------------------------

Clerk of Court/Issuing Officer's Signature Pro Se Litigant's Name, Address and Telephone Number :	Date	Print Name
--	------	------------

PROOF OF SERVICE

SERVED	DATE <u>11/9/18</u>	FEES AND MILEAGE TO BE TENDERED TO WITNESS UPON DAILY ARRIVAL ☒ YES ☐ NO AMOUNT \$ <u>28.27</u>
	PLACE	
SERVED ON <u>Hayden Coaling</u>	MANNER OF SERVICE <u>US Mail</u>	
SERVED BY <u>Matthew M. Ch...</u>	TITLE <u>Legal Assistant</u>	

DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.
 Executed on 11/9/18

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises—or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance; or

(ii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or

(iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena:

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1)(A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(6)(B). The court may specify conditions for the discovery.

(2)(A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, the receiving party must take reasonable steps to retrieve the information. The person who produced the information must preserve the information until the claim is resolved.

EXHIBIT 1

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
C.A. No. 16-CP-18-1001

TAMMY C. RICHARDSON,
PLAINTIFF,

V.

HALCYON REAL ESTATE
SERVICES, LLC AND MCCABE,
TROTTER & BEVERLY, P.C.,
DEFENDANTS.

PLAINTIFF'S NOTICE OF
VIDEOTAPED DEPOSITION OF
SHERI SELF

TO: ANDREW W. COUNTRYMAN, ESQ. AND ROBERT P. WOOD, ESQ.,
ATTORNEYS FOR DEFENDANT MCCABE TROTTER & BEVERLY, P.C.:

PLEASE TAKE NOTICE that Plaintiff, pursuant to the South Carolina Rules of Civil Procedure and other law, will take the video deposition of the witness described below, at the date, time and place stated or at such other time and place as may be agreed upon, before a person authorized to administer oaths. This deposition may be used for all purposes allowed by the rules.

Name of Witness:	Sheri Self
Time and Date:	10:30 a.m., January 24, 2019
Place:	Chambless Higdon Richardson Katz & Griggs, LLP Highridge Centre 3920 Arkwright Rd., Ste. 405 Macon, GA 31210

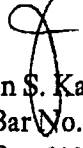
PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(j)(8), SCRPC, counsel for the Plaintiff hereby identifies and reserves the right to use any documents produced or made available in discovery by any party during this deposition, and hereby gives notice of the Plaintiff's

D

intent to question the witness regarding all documents produced, identified or made available by any party during the course of discovery, as well as those obtained pursuant to subpoena or records request.

Further, the witness is requested to produce all documents or materials reviewed by her to prepare for the deposition by January 18, 2019.

KAHN LAW FIRM, LLP


Justin S. Kahn
SC Bar No. 65100
PO Box 31397
Charleston, SC 29417-1397
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jskahn@kahnlawfirm.com

MARY LEIGH ARNOLD, PA

Mary Leigh Arnold
SC Bar No. 419
Sammie@maryarnoldlaw.com
Mary Leigh Arnold, P.A.
749 Johnnie Dodds Blvd., Ste. B
Mt. Pleasant, SC 29464
p. 843.971.6053
f. 843.971.6055

**ATTORNEYS FOR TAMMY C.
RICHARDSON**

Charleston, S.C.
November 13, 2018

CERTIFICATE OF SERVICE

A copy of the foregoing was served on Defendant McCabe Trotter & Beverly through her counsel, by Email and U.S. Mail on November 13, 2018, in the manner prescribed by the applicable Rules of Civil Procedure.

Signed: _____



COUNTRYMAN LAW FIRM

LITIGATION ♦ MEDIATION

Andrew W. Countryman
321 Wingo Way, Suite 102
Mount Pleasant, S.C. 29464
*Certified S.C. Circuit Court Mediator

awc@countrymanlawfirm.com
www.countrymanlawfirm.com
843.253.4477 office
844.644.3165 fax

November 14, 2018

Via Email Only

Justin S. Kahn
Kahn Law Firm, LLP
562 Savannah Hwy
Charleston, SC 29407
jskahn@kahnlawfirm.com

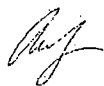
Re: *Richardson v. McCabe, Trotter & Beverly, P.C., et al.*
C/A No.: 2016-CP-18-1001
CLF File: 00006 – 00008

Dear Justin:

The Notices for the depositions you recently set all refer to any documents produced and made available in discovery as documents you might use in the depositions under SCRCP 30(j)(8). This Rule states that if deposing counsel provides or otherwise identifies the documents to be used during the deposition at least two business days before the deposition, then the witness and the witness' counsel do not have the right to discuss the documents privately before the witness answers questions about them. If deposing counsel does not provide or identify the documents ahead of time, then counsel and the witness may have a reasonable amount of time to discuss the document before the witness answers questions concerning it.

The purpose of the Rule is to avoid surprise and wasting time during a deposition. Thousands and thousands of documents have been produced in discovery in this case. Blanketly referring to all of them does not comport with the letter or spirit of the Rule. Unless you identify or produce specific material you actually plan to use in the depositions two days beforehand, I reserve the right to discuss material presented to the witnesses privately during the deposition(s).

Sincerely,



Andrew W. Countryman

AWC/sgc
cc (via email): Bob Wood, Pattie Michel, Sammie Arnold

E

ELECTRONICALLY FILED - 2019 Jan 21 9:24 AM - DORCHESTER - COMMON PLEAS - CASE#2016CP1801001

From: Andrew W. Countryman awc@countrymanlawfirm.com
Subject: Richardson v. MTB; letter
Date: November 14, 2018 at 12:35 PM
To: Justin S. Kahn jskahn@kahnlawfirm.com
Cc: sammie maryarnoldlaw.com sammie@maryarnoldlaw.com, Robert P. Wood robert.wood@rtt-law.com, Pattie H Michel pmichel@kahnlawfirm.com, Tabitha.Emanuelli@rtt-law.com

Please see the attached letter.

Andy
 Andrew Countryman
 Countryman Law Firm
 321 Wingo Way, Suite 102
 Mount Pleasant, SC 29464
 843-253-4477
awc@countrymanlawfirm.com
 *Certified South Carolina Circuit Court Mediator

COUNTRYMAN LAW FIRM
 LITIGATION ♦ MEDIATION

Andrew W. Countryman
 321 Wingo Way, Suite 102
 Mount Pleasant, S.C. 29464
 *Certified S.C. Circuit Court Mediator

awc@countrymanlawfirm.com
www.countrymanlawfirm.com
 843.253.4477 office
 844.644.3165 fax

November 14, 2018

Via Email Only

Justin S. Kahn
 Kahn Law Firm, LLP
 562 Savannah Hwy
 Charleston, SC 29407
jskahn@kahnlawfirm.com

Re: *Richardson v. McCabe, Trotter & Beverly, P.C., et al.*
C/A No.: 2016-CP-18-1001
CLF File: 00006 - 00008

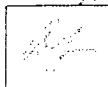
Dear Justin:

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The purpose of the Rule is to avoid surprise and wasting time during a deposition. Thousands and thousands of documents have been produced in discovery in this case. Blanketly referring to all of them does not comport with the letter or spirit of the Rule. Unless you identify or produce specific material you

actually plan to use in the depositions two days beforehand, I reserve the right to discuss material presented to the witnesses privately during the deposition(s).

Sincerely,

A handwritten signature in black ink, appearing to read "AWC", enclosed within a rectangular box.

Andrew W. Countryman

AWC/sgc

cc (via email): Bob Wood, Pattie Michel, Sammie Arnold

Justin Kahn

Richardson v. MTB

To: Andrew Countryman, Cc: Mary L. Arnold, sgc, Bob Wood

January 11, 2019 at 6:31 PM

Details

JK

Andy and Bob

These are some of the documents we may use in addition to those previously identified for the depositions next week. Thanks.

Justin S. Kahn
Kahn Law Firm, LLP
PO Box 31397
Charleston, SC 29417

p. 843.577.2128

web kahnlawfirm.com
blog ipathnotebook.com

F

Documents and Beginning Bates
Trotter, Staphanie Depo and Exhibits
Richardson, Tammy Depo and Exhibits
Peterson, David Depo and Exhibits
McCabe, Ryan Depo and Exhibits
Discovery Responses by MTB
Answer of MTB
MTB 8
MTB 220
MTB 244
MTB 248 -262
MTB Supp 62
MTB Supp 70
MTB Supp 2183
MTB Supp. 000003
MTB Supp. 000008
MTB Supp. 000009
MTB Supp. 000016
MTB Supp. 000042
MTB Supp. 000053
MTB Supp. 000059
MTB Supp. 000062
MTB Supp. 000950
MTB Supp. 001330
MTB Supp. 002103
MTB Supp. 002110
MTB Supp. 002139
MTB Supp. 002161
MTB Supp. 008466
MTB Supp. 008474
MTB Supp. 008482
MTB Supp. 008802
MTB Supp. 008810

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COUNTRYMAN LAW FIRM

Litigation ♦ Mediation

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January 15, 2019

Justin S. Kahn
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562 Savannah Hwy
Charleston, SC 29407
jskahn@kahnlawfirm.com

Re: *Richardson v. McCabe, Trotter & Beverly, P.C., et al.*
C/A No.: 2016-CP-18-1001
CLF File: 00006 – 00008

Dear Justin:

I received your email sent at 6:31 p.m. Friday regarding documents you may use during the upcoming depositions of Haylen Gatling and Theron Coetzee this week. If this was your attempt to identify documents in compliance with SCRCP 30(j)(8), you failed. The Rule provides that if a deposing lawyer provides or otherwise identifies documents he/she plans to use in a deposition two days ahead of time, then the lawyer for the witness may not discuss the document privately with the witness during the deposition. If the deposing lawyer fails to so identify or produce documents, the witness and her lawyer may discuss the material privately before the witness answers questions about them.

The parties have exchanged tens of thousands of documents in discovery in this case. You noticed these depositions (by agreement) on November 9, 2018. I sent you a letter on November 14th regarding identification of documents and Rule 30(j)(8). You then sent a bizarre email December 13, 2018, demanding dates for Ms. Coetzee's deposition before the end of the year and threatening to file a contempt motion against me. I figured you must've had a bad day and kindly ignored this.

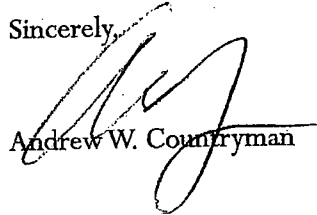
You then sent the 1/11/19 email regarding deposition documents, which is insufficient under SCRCP 30(j)(8). The Rule is meant to prevent surprise and allow witnesses to properly prepare for depositions. You sent a 68-page spreadsheet referencing the "beginning" bates numbers of approximately 3,000 documents. You also referred to "documents previously identified." The only documents you identified before included everything exchanged in discovery. As noted in my

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11/14/18 letter, this is insufficient to identify documents under Rule 30(j)(8). Referencing over 3,000 pages of material in a spreadsheet is no better.

It would be objectively impossible for anyone to use that many documents in either of or both of these deposition. I still have no idea what material you truly plan to use in the depositions. This appears to be a sad attempt to obtain soundbites from unsophisticated (non-lawyer) using documents with which they are unfamiliar. It is certainly not a good faith effort to identify documents under the Rule.

Sincerely,



Andrew W. Countryman

AWC/sgc

cc: Robert Wood, Pattie Michel, Sammie Arnold

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
COUNTY OF DORCHESTER) FIRST JUDICIAL CIRCUIT
CASE NO. 2016-CP-18-01001

TAMMY C. RICHARDSON,)
Plaintiff,)
vs.)
MCCABE, TROTTER & BEVERLY, P.C.,)
Defendant.)

* * * * *

VIDEOTAPED
DEPOSITION OF: HAYLEN GATLING
DATE TAKEN: Tuesday, January 15, 2019
TIME: 10:00 a.m.
PLACE: Rogers Townsend & Thomas, PC
1221 Main Street, 14th Floor
Columbia, SC
REPORTED BY: TERI L. SAMPSON, RPR,
Notary Public and Certified
Live Note Reporter

* * * * *

POST OFFICE BOX 61011
NORTH CHARLESTON, SOUTH CAROLINA 29419

I N D E X

WITNESS: HAYLEN GATLING

Examination	Page
BY MR. KAHN.	280
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REPORTER'S CERTIFICATE	294
ERRATA SHEET	295

EXHIBITS:

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1	Plaintiff's Notice of Videotaped Deposition of Haylen Gatling	5
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4	History Report, MTB 000220-000235	186
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10	Invoice, MTB 000216	262
11	Statement.	

1		EXHIBITS: (Continued)	
2	Plaintiff's		
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4	12	Notice of Debt and Intent	
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8	14	Note card	--
9	15	Note card	--
10	16	Cost sheet	--

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S T I P U L A T I O N S

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It is hereby stipulated and agreed by and between the parties hereto, through their respective counsel, that the reading and signing of the transcript is reserved by the Deponent.

1 Q Okay. But that was after you all already had
2 the box, and Stephanie would be in her office doing
3 whatever, and you all were somewhere else; right?

4 A Yes.

5 Q Okay. And the -- in terms of an account
6 statement, this is a -- we've had multiple copies of
7 this, but --

8 MR. COUNTRYMAN: I'm going to have to talk to
9 her about that.

10 MR. KAHN: I haven't even shown her what it
11 is, yet, so hold on. Let me figure out what it is.

12 BY MR. KAHN:

13 Q There's one that's been marked as Stephanie
14 Trotter No. 22. Let me double-check something. Right.
15 So this is a document from Stephanie Trotter's
16 deposition that's been Bates -- I'm sorry, that's been
17 marked as Exhibit No. -- I'm sorry, did I read the
18 number right? Yeah, 22. Do you see where it says
19 Trotter 22?

20 A Yes.

21 MR. COUNTRYMAN: I want to talk to her about
22 this under 30(j)(8).

23 MR. KAHN: I haven't finished my question, and
24 let me at least finish my question.

25 MR. COUNTRYMAN: I'm going to talk to her

1 about it under 30(j)(8). You're giving it to her, and
2 I told you --

3 MR. KAHN: I have previously identified this
4 document in an email. I specifically stated the
5 document --

6 MR. COUNTRYMAN: Justin, you --

7 MR. KAHN: Andy, let me just put on the
8 record -- let me just put it on the record.

9 MR. COUNTRYMAN: Just give me the chance to do
10 the same. All right? That's all --

11 MR. KAHN: I got no problem with that. I
12 specifically stated to you last Friday, and before as
13 part of the notice, that we may review with the witness
14 documents previously produced in this case. On Friday,
15 I specifically stated that we may review documents with
16 this witness that were exhibits to Stephanie Trotter's
17 deposition, along with other people's deposition.

18 I have handed her one of those documents from
19 her deposition, and I don't even believe I finished
20 asking her a question, and you have -- somehow now
21 taking the position that you're allowed to speak with
22 the witness about it. I think that violates the rules.
23 You have a different position. We can let a judge take
24 it up. And if you want to say anything about that,
25 that's fine, but that's my position. I don't think you

1 should be allowed to talk with her, but you do what you
2 want.

3 MR. COUNTRYMAN: May I?

4 MR. KAHN: And we'll let the judge deal with
5 it.

6 MR. COUNTRYMAN: All right. You noticed this
7 deposition I think in the first week of November of
8 2018. The week after that, I sent you a letter
9 indicating that the notice was insufficient to identify
10 documents under 30(j)(8) as the rule is intended to
11 identify documents that you'll use in a deposition so
12 that a witness won't be surprised. Instead, your
13 notice identified basically everything that had been
14 exchanged in discovery. I didn't get any response to
15 that letter.

16 I then received an email Friday at 6:30, again
17 referencing every document in discovery, and including
18 a 68-page spreadsheet of different -- a list of
19 different documents. I don't think that's sufficient
20 under the rule. I talked to you about that this
21 morning before the deposition and invited you to
22 provide me with documents so I could go over them with
23 her. You didn't.

24 You did that again before lunch, and I gave
25 you a letter at lunch. We had about an hour lunch, and

1 I gave you that same opportunity, which you declined.
2 So I'm going to talk to the witness about this within a
3 reasonable period of time as the rule provides. And
4 if --

5 MR. KAHN: I think that absolutely violates
6 the rule. We'll let the judge deal with it.

7 MR. COUNTRYMAN: And I don't really care what
8 you think.

9 MR. KAHN: I understand. That's why we have
10 judges.

11 VIDEOGRAPHER: This concludes Video No. 2 in
12 the video deposition of Haylen Gatling. The time is
13 approximately 2:52 p.m. We are now off the record.

14 (The deposition recessed briefly.)

15 MR. KAHN: Mr. Countryman and the witness have
16 come back into the room. Although we have different
17 positions on what the rule, whether or not there's been
18 compliance with the rule, I'm now going to hand Mr.
19 Countryman and the witness a document entitled "History
20 Report," which has been Bates stamped marked as
21 MTB000220, which I believe is also an exhibit to Miss
22 Trotter's and the other depositions.

23 Although I believe I should be allowed to ask
24 the witness questions immediately about this document,
25 Mr. Countryman has a different position, and we can

1 take that up with the judge.

2 MR. COUNTRYMAN: We will. And just for the
3 record, this case involves tens of thousands, if not
4 hundreds of thousands, of documents. I had no idea
5 what documents would be used in this deposition.
6 Identification beforehand didn't give me that idea.
7 That's all I've been asking for. I'm not trying to be
8 unreasonable. I'm not trying to be obtuse, or delay
9 things. Take a reasonable amount of time and look at
10 this with her and we'll...

11 (STATEMENT OF ACCOUNT MARKED AS PLAINTIFF'S
12 EXHIBIT NO. 3 FOR I.D.)

13 (HISTORY REPORT MARKED AS PLAINTIFF'S EXHIBIT
14 NO. 4 FOR I.D.)

15 (INVOICE MARKED AS PLAINTIFF'S EXHIBIT NO. 5
16 FOR I.D.)

17 VIDEOGRAPHER: We are now back on the record.
18 Today's date is January 15th, 2019. The time is
19 approximately 3:37 p.m. This is Video No. 3 in the
20 video deposition of Haylen Gatling.

21 BY MR. KAHN:

22 Q What did you all talk about?

23 MR. COUNTRYMAN: Don't answer that.

24 MR. KAHN: Okay. We'll let the judge take it
25 up.

1 BY MR. KAHN:

2 Q I want to hand you what I've marked as
3 Plaintiff's Exhibit No. 3, which is a document at the
4 top that says "Statement of Account as of 2/24/15, a
5 document, Plaintiff's Exhibit No. 4, which is something
6 called "History Report," and Plaintiff's Exhibit No. 5,
7 which is a 65-dollar invoice.

8 MR. COUNTRYMAN: Can I make a quick statement
9 for the record before you ask your question? He asked
10 what you talked about. I directed you not to answer on
11 the grounds of attorney-client privilege. We discussed
12 the documents that you were given just a few minutes
13 ago. Those are the ones that were not, in my view,
14 previously properly identified under Rule 30(j)(8).
15 That's something that he and I can discuss at another
16 time. But I'm directing you not to answer that
17 question under attorney-client privilege grounds.

18 MR. KAHN: I have a different perspective;
19 but, again, we'll go --

20 MR. COUNTRYMAN: I just wanted it to be --

21 MR. KAHN: I understand. We'll go forward.

22 BY MR. KAHN:

23 Q The -- have you seen these documents before?

24 A Yes.

25 Q And in terms of going back to talk about the

1 process, the -- have you seen the history report that I
2 provided to you as Plaintiff's Exhibit No. 4?

3 A You mean before now? Before today?

4 Q Yes. Have you seen this particular document
5 before today?

6 A I don't think so.

7 Q Okay. Is this the kind of document or report
8 that's typically generated in these kinds of lien or
9 HOA collection matters that you have -- that you're
10 familiar with, that you've worked with, with this law
11 firm over the last several years?

12 A I don't use this.

13 Q All right. Do you recognize this as a
14 document created by McCabe Trotter? Do you see the
15 first page, where it says "McCabe Trotter"?

16 A Yes.

17 Q And it says "History report," do you see that?

18 A Yes.

19 Q Do you see "For account 12480"? Do you see
20 that?

21 A Yes.

22 Q "Tammy C. Richardson," do you see that?

23 A Yes.

24 Q Do you see where it says "Reference No.
25 20475/5"?

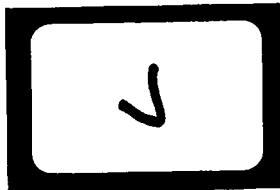
STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2016-CP-18-1001
	)	
TAMMY C. RICHARDSON,	)	
	)	
Plaintiff,	)	MCCABE, TROTTER & BEVERLY, P.C.'S
	)	MOTION FOR PROTECTIVE ORDER
vs.	)	(DEPOSITION OF HAYLEN GATLING)
	)	
HALCYON REAL ESTATE SERVICES, LLC	)	
and MCCABE, TROTTER & BEVERLY,	)	
P.C.,	)	
	)	
Defendants.	)	
_____	)	

Defendant McCabe, Trotter & Beverly, P.C. ("MTB"), by and through its undersigned counsel, submits this Motion for a Protective Order pursuant to SCRCP 26(c), 30(d) and 30(j) prohibiting Plaintiff's counsel from questioning Haylen Gatling regarding attorney-client privileged information. MTB also seeks sanctions under Rule 37. MTB shows the Court the following:

Background

MTB is a law firm that, among other things, performs collections actions for HOAs. Plaintiff was a defendant in a lien collections action that MTB pursued for her HOA after she failed to pay HOA assessments for many years without reason. Instead of paying what she owed, Plaintiff sought counsel and sued MTB for violation of the Fair Debt Collections Practices Act, 15 U.S.C. § 1692 ("FDCPA").

Haylen Gatling is a paralegal at MTB, and Plaintiff's counsel decided to take her deposition. Plaintiff's counsel noticed the deposition to take place on January 15, 2019, via a deposition Notice served November 9, 2018. Ex. 1. The Notice contained a statement purporting to identify all



documents exchanged, produced, and received in discovery as material during the deposition under SCRCP 30(j)(8):

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(j)(8), SCRCP, counsel for the Plaintiff hereby identifies and reserves the right to use any documents produced or made available in discovery by any party during this deposition, and hereby gives notice of the Plaintiff's intent to question the witness regarding all documents produced, identified or made available by any party during the course of discovery, as well as those obtained pursuant to subpoena or records request.

Less than a week later (and two months before the deposition was to take place) counsel for MTB sent Plaintiff's counsel a letter regarding the documents and Rule 30(j)(8) (full copy attached as Ex. 2):

COUNTRYMAN LAW FIRM

LITIGATION ♦ MEDIATION

Andrew W. Countryman
321 Wingo Way, Suite 101
Mount Pleasant, S.C. 29464
*Certified S.C. Circuit Court Mediator

awc@countrymanlawfirm.com
www.countrymanlawfirm.com
843.253.4477 office
844.644.3165 fax

November 14, 2018

Via Email Only
Justin S. Kahn
Kahn Law Firm, LLP
562 Savannah Hwy
Charleston, SC 29407
jskahn@kahnlawfirm.com

Re: *Richardson v. McCabe, Trotter & Beverly, P.C., et al.*
C/A No.: 2016-CP-18-1001
CLF File: 00006 - 00008

Dear Justin:

The Notices for the depositions you recently set all refer to any documents produced and made available in discovery as documents you might use in the depositions under SCRCP 30(j)(8). This Rule states that if deposing counsel provides or otherwise identifies the documents to be used during the deposition at least two business days before the deposition, then the witness and the witness' counsel do not have the right to discuss the documents privately before the witness answers questions about them. If deposing counsel does not provide or identify the documents ahead of time, then counsel and the witness may have a reasonable amount of time to discuss the document before the witness answers questions concerning it.

The purpose of the Rule is to avoid surprise and wasting time during a deposition. Thousands and thousands of documents have been produced in discovery in this case. Blanketly referring to all of them does not comport with the letter or spirit of the Rule. Unless you identify or produce specific material you actually plan to use in the depositions two days beforehand, I reserve the right to discuss material presented to the witnesses privately during the deposition(s).

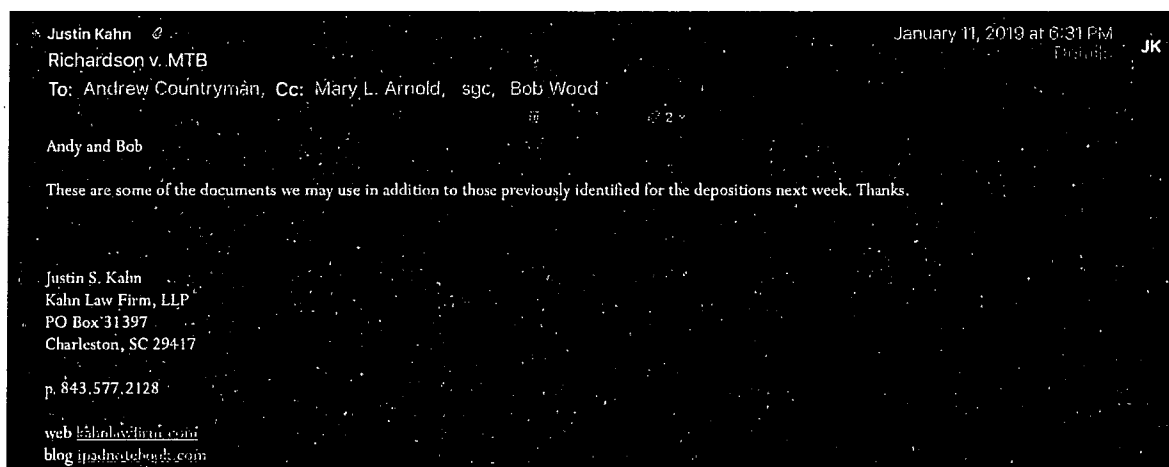
Sincerely,



Andrew W. Countryman

The letter explained that naming all the many thousands of documents produced in discovery was insufficient to identify documents to be used during the deposition under SCRCP 30(j)(8). Further, it specified that if Plaintiff's counsel failed to produce or identify the documents he really planned to use two days prior to the deposition (something other than merely referencing all material exchanged in discovery) MTB's counsel reserved the right and planned to discuss the material with the witness under Rule 30(j)(8). Plaintiff's counsel never responded to the letter.

At 6:31 p.m. Friday, January 11, 2019, Plaintiff's counsel sent an email with a 68-page spreadsheet (Ex. 3) listing thousands of documents he "may use" in the deposition(s) "in addition to those previously identified. . ."



The spreadsheet referenced all the exhibits used in the depositions taken previously in the case, all discovery responses of MTB, MTB's Answer and referenced thousands and thousands of pages of material produced in discovery.

The morning of Ms. Gatling's deposition (Tuesday, January 15th), counsel for MTB attempted to discuss the issue with Plaintiff's counsel. Counsel for MTB reiterated that the identification of all documents exchange in the case did not comply with Rule 30(j)(8) and asked if Plaintiff's counsel had documents he planned to use in the deposition so that counsel for MTB could

review with the witness before to the deposition. Otherwise, MTB's counsel indicated he planned to review material presented to the witness during he deposition under Rule 30(j)(8). Plaintiff's counsel refused to provide documents and, without providing and reason or explanation, maintained that his identification of many thousands of documents was sufficient. The deposition broke for lunch shortly after noon. Plaintiff's counsel did not not use documents other than the deposition Notice before the lunch break.

Counsel for MTB again addressed the issue with Plaintiff's counsel at the lunch break. MTB's counsel said that if Plaintiff's counsel planned to use documents with the witness after the break, the undersigned could review them with the witness over lunch and avoid having to interrupt the deposition to do so later. Plaintiff's counsel ignored this request. Counsel for MTB then presented a letter to Plaintiff's counsel that went over (yet another time) why the identification of thousands of documents in the 1/11/19 email was insufficient under 30(j)(8) and again asking Plaintiff's counsel to provide any documents he planned to use with the witness so the undersigned could review them with her over the lunch break and avoid interrupting the deposition. Ex. 4. Plaintiff's counsel refused to even address the issue further and left the room.

After the lunch break, Plaintiff's counsel presented a document to the witness. Counsel for MTB objected and said he planned to review the document with the witness because it had not been previously appropriately identified or produced under Rule 30(j)(8). Plaintiff's counsel then gave all the material he planned to use with the witness to counsel for MTB to discuss with the witness. Counsel for MTB and the witness privately discussed the material for approximately 15 minutes before returning to the deposition.

After that break, Plaintiff's counsel asked the witness what she had discussed privately with counsel. Counsel for MTB directed the witness not to answer on grounds of attorney-client

privilege. Counsel for each party put a statement on the record regarding the issue. Ex. 5, Depo. Excerpt. MTB's counsel explained how he had told Plaintiff's counsel numerous times that identifying all documents in discovery was insufficient to comply with Rule 30(j)(8) and that as far back as November 2018, counsel for MTB had warned Plaintiff's counsel that he would discuss material presented to the witness during the deposition if he did not make a good faith effort to identify documents he actually planned to use with the witness. The deposition proceeded uninterrupted. Of the thousands and thousands of documents produced in discovery, Plaintiff's counsel used ten documents as exhibits with the witness in the deposition.

Argument

"The entire thrust of South Carolina's discovery rules involves full and fair disclosure, 'to prevent a trial from becoming a guessing game or one of surprise for either party.'" Samples v. Mitchell, 329 S.C. 105, 495 S.E.2d 213 (Ct. App. 1997), *quoting* Hodge v. Meyers, 255 S.C. 542, 180 S.E.2d 203 (1971). Simply put, the core purpose of discovery is to obtain the *truth*. *See, e.g., Samples, supra*. The rights of discovery the Rules provide give the trial lawyer the means to prepare for trial, and when these rights are not accorded, prejudice is assumed. Downey v. Dixon, 294 S.C. 42, 362 S.E.2d 317 (Ct. App. 1987).

SCRCP 30(j)(8) is in place to prevent surprises during depositions and allow witnesses to testify knowledgeably regarding material presented to them. The Rule says that if a lawyers conducting a deposition provides or identifies material she plans to use with the witness two days ahead of the deposition, the witness and her lawyer may not discuss the material during the deposition. Otherwise, the witness and her lawyer may.

Deposing counsel shall provide to opposing counsel a copy of all documents shown to the witness during the deposition, either before the deposition begins or contemporaneously with the showing of each document to the witness. If the documents

are provided (or otherwise identified) at least two business days before the deposition, then the witness and the witness' counsel do not have the right to discuss the documents privately before the witness answers questions about them. If the documents have not been so provided or identified, then counsel and the witness may have a reasonable amount of time to privately discuss the documents before the witness answers questions concerning the document.

Identifying or producing documents under Rule 30(j)(8) prevents surprise and allows witnesses to testify knowledgeably regarding material presented to them in a deposition.

a. Plaintiff's identification of all material produced in discovery does not comply with the Rule.

More than two months prior to Ms. Gatling's deposition, counsel for MTB plainly and in writing told Plaintiff's counsel that referencing all material produced in discovery was not sufficient to identify material he planned to use in the deposition under Rule 30(j)(8). Counsel for MTB indicated that unless Plaintiff's counsel made a real effort to identify or produce material he actually planned to use, MTB's counsel reserved the right and planned to discuss material presented to the witness during the deposition.

Plaintiff's counsel ignored the November 14, 2018, letter. Instead of responding to it, he sent an email the Friday evening before the Tuesday deposition (again) identifying everything produced in discovery, including a 68-page spreadsheet listing thousands of documents and referencing all material used in prior depositions. This was not an attempt to provide documents he planned to use during the deposition so the witness could knowledgeably testify about them. This was an attempt to hide what he actually planned to use and surprise the witness.

Plaintiff's counsel refused to address the issue substantively the morning of the deposition and at the lunch break, which were two more chances for him to present documents he actually planned to use in the deposition so counsel for MTB could review them with the witness. Plaintiff's counsel refused to present documents or even discuss the issue.

Plaintiff's counsel's blanket identification of all material exchanged in discovery, his 68-page spreadsheet listing various material produced in the case and referencing all deposition exhibits used in the case to date was did not to comply with Rule 30(j)(8). Plaintiff's counsel never intended to use all material exchanged in discovery or all exhibits to every prior deposition in the case, and in fact, he only used a small select portion of material with the witness. He provided zero indication prior to the deposition of what specific documents he planned to use, as opposed to the thousands and thousands of documents exchanged in discovery and used in prior depositions. Plaintiff's counsel clearly wanted to surprise the witness and use documents with her with which she was unfamiliar. Plaintiff's did not endeavor to obtain the truth (as is the purpose of discovery), but instead wanted to get soundbites from the witness to support his case.

Counsel for MTB, after stating his position on the record (and after two letters and at least two attempts to discuss the issue to prevent interrupting the deposition), appropriately took a reasonable amount of time (approximately 15 minutes) under Rule 30(j)(8) to review the exhibits with the witness. Under the Rule, the conversation between counsel and the witness during this time was confidential and privileged. Counsel for MTB therefore appropriately directed the witness not to answer the question, "What did you talk about?" following the private meeting.

b. Plaintiff's identification of material was not timely under the Rule.

In addition to being substantively insufficient under Rule 30(j)(8), Plaintiff's counsel's identification of material was not timely. SCRCP 6(a) provides that "[W]hen the period of time prescribed or allowed is less than seven days, intermediate Saturdays, Sundays and holidays shall be excluded in the computation." That means the two-day period addressed in Rule 30(j)(8) does not include weekends.

Ms. Gatling's deposition was set for 10:00 a.m., Tuesday, January 15th. Two business days prior to this would have been 10:00 a.m., Friday, January 11th. Sending the material at 6:31 p.m., the very end of the day on Friday the 11th, did not constitute sending it "two business days" prior to the deposition. Therefore, counsel for MTB had the right to privately review deposition exhibits with the witness under Rule 30(j)(8).

c. Sanctions

Plaintiff's counsel only used ten exhibits in the deposition totaling less than thirty pages. Sending a 68-page spreadsheet identifying all material produced in discovery the Friday prior to the deposition was not a good faith effort to comply with Rule 30(j)(8). It was, in fact, just the opposite- an effort to conceal what he truly planned to use and surprise the witness to obtain soundbites. Anticipating this, counsel for MTB time and time again attempted to address the issue with Plaintiff's counsel, and he refused.

SCRCP Rule 37 provides for sanctions against a lawyer whose conduct necessitates a discovery motion. Such sanctions shall include attorney's fees and reasonable expenses incurred obtaining the order. Such sanctions are appropriate here. This situation was completely avoidable, and in fact, counsel for MTB tried to avoid the situation. This included multiple letters to and conversations with Plaintiff's counsel about the issue. Instead of substantively responding or providing material to review prior to the deposition, Plaintiff's counsel refused to discuss the issue other than to say he disagreed with MTB's counsel's position.

Conclusion

From the beginning, MTB's counsel only sought to obtain material prior to the deposition that may be used in the deposition as the Rules provide. This would allow the witness to be familiar with the material and testify knowledgeably regarding it. However, Plaintiff's counsel's objective

was not to obtain the truth or properly identify material so the witness could be familiar with it during the deposition. It was to hide the true documents he planned to use by identifying thousands and thousands of documents exchanged and otherwise used in discovery with the plan of obtaining soundbites he could use to benefit his case.

Plaintiff's identification of material under Rule 30(j)(8) did not substantively comply with the Rule, nor was it timely under it. Because Plaintiff's counsel did not provide or identify material he planned to use with the witness two days prior to the deposition, MTB's counsel had the right under Rule 30(j)(8) to discuss the material with the witness privately. Therefore, the Court should protect the witness from having to answer the questions asking what she discussed with counsel during the meeting regarding the documents during the deposition. Additionally, Plaintiff's counsel's tactics were contrary to the the discovery rules, which are designed to prevent surprise and find the truth. The Court should also award sanctions in the form of costs and attorney's fees in favor of MTB for having to file and argue this Motion.

[signature page to follow]

Respectfully submitted,

By: /s/ Andrew W. Countryman
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803-771-7900

**Counsel for McCabe, Trotter &
Beverly, P.C.**

Justin Kahn

January 21, 2019 at 4:59 PM

JK

Richardson v. MTB Self Depo Documents

To: Andrew Countryman, Cc: Bob Wood, Mary L. Arnold, Pattie H Michel

Andy

This is a further list of documents I may use in the deposition of Sheri Self. Although I do not believe such a further list is required, you seem to think it is. The bates numbers listed are the beginning numbers of the PDF Files you named or assigned to the PDF documents produced. The deposition exhibits to the prior depositions should be self explanatory. I look forward to seeing you Thursday.

Justin S. Kahn
Kahn Law Firm, LLP
PO Box 31397
Charleston, SC 29417

K

EXHIBIT 2

Stephanie Trotter Depo Exhibits
Ryan McCabe Depo Exhibits
Haylen Gatling Depo Exhibits
Theron Coetzee Depo Exhibits
Tammy Richardson Depo Exhibits

MTB 000244

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10:45:17 STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
10:45:17) FIRST JUDICIAL CIRCUIT
10:45:17 COUNTY OF DORCHESTER) CASE NO. 2016-CP-18-01001
10:45:17
10:45:17 TAMMY C. RICHARDSON,)
10:45:17)
10:45:17 Plaintiff,)
10:45:17)
10:45:17 vs.)
10:45:17)
10:45:17 MCCABE, TROTTER & BEVERLY, P.C.,)
10:45:17)
10:45:17 Defendant.)

10:45:17 * * * * *

10:45:17 VIDEOTAPED
10:45:17 DEPOSITION OF: SHERI SELF
10:45:17 DATE TAKEN: Thursday, January 24, 2019
10:45:17 TIME: 10:30 a.m.
10:45:17 PLACE: Chambless Higdon Richardson
10:45:17 Katz & Griggs, LLP
10:45:17 Highridge Centre
10:45:17 3920 Arkwright Rd., Suite 405
10:45:17 Macon, GA 31210
10:45:17 REPORTED BY: TERI L. SAMPSON, RPR,
10:45:17 Notary Public and Certified
10:45:17 Live Note Reporter

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S T I P U L A T I O N S

10:45:17 2

It is hereby stipulated and agreed by and

10:45:17 3

between the parties hereto, through their respective

10:45:17 4

counsel, that the reading and signing of the

10:45:17 5

transcript is reserved by the Deponent.

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10:57:00 1 the homeowner association was told that should the law
10:57:03 2 firm not collect money from the homeowner, then the
10:57:06 3 homeowner association would not owe any attorney's
10:57:10 4 fees?

10:57:12 5 A I don't recall.

10:57:13 6 Q Okay. I'll give you an example of a fee
10:57:18 7 proposal. All right. Well, I'll -- if you don't
10:57:20 8 recall, you don't recall.

10:57:21 9 Do you remember when you came -- when you
10:57:23 10 started working at McCabe Trotter, whether or not you
10:57:27 11 had seen any HOA fee proposals?

10:57:29 12 And I'll show you --

10:57:32 13 A No. I --

10:57:32 14 Q Let me just -- well, you say you don't -- let
10:57:34 15 me just show you one before I mark it.

10:57:36 16 This is -- previously been marked as an
10:57:38 17 exhibit to Stephanie Trotter's deposition -- No. 7.
10:57:41 18 This is an example of a fee proposal.

10:57:44 19 A I had no part of this.

10:57:45 20 Q All right. Having no part of this is
10:57:47 21 slightly different.

10:57:48 22 What I'm asking you is you see the second
10:57:50 23 paragraph, where it says -- the last sentence: "No fee
10:57:55 24 will be charged to the HOA" -- being homeowner
10:58:00 25 association -- "if McCabe, Trotter & Beverly, P.C., is

10:58:03 1 unsuccessful in collecting"?

10:58:04 2 Do you see that?

10:58:05 3 A "No fee will be charged" --

10:58:05 4 MR. COUNTRYMAN: I'm going to have to talk

10:58:06 5 to her about this. I don't think this was properly

10:58:08 6 identified under 30(j)(8).

10:58:10 7 MR. KAHN: I'm just asking if --

10:58:11 8 BY MR. KAHN:

10:58:11 9 Q Did you see that sentence?

10:58:12 10 MR. COUNTRYMAN: And I'm going to tell her

10:58:13 11 not to answer that before we discuss it.

10:58:15 12 BY MR. KAHN:

10:58:15 13 Q Do you see that sentence?

10:58:17 14 MR. COUNTRYMAN: So don't answer that.

10:58:18 15 MR. KAHN: All right. I --

10:58:18 16 MR. COUNTRYMAN: Come with me. We're going

10:58:19 17 to chat about it.

10:58:21 18 MR. KAHN: I don't understand the basis of

10:58:21 19 your objection. These -- this document has been

10:58:22 20 previously produced; right?

10:58:24 21 MR. COUNTRYMAN: Yup.

10:58:25 22 MR. KAHN: All right. And you think the

10:58:25 23 rules allow you to talk with a witness about a document

10:58:29 24 that has been previously produced or identified?

10:58:31 25 MR. COUNTRYMAN: Yes.

10:58:32 1 MR. KAHN: All right. I disagree, and I
10:58:33 2 think you're not allowed to talk with her, but --
10:58:35 3 MR. COUNTRYMAN: Okay. Fair enough.
10:58:36 4 Come with me.
10:58:37 5 VIDEOGRAPHER: We will now go off the record.
10:58:37 6 The time is approximately 10:59 a.m.
10:58:40 7 (The deposition recessed briefly.)
11:01:39 8 VIDEOGRAPHER: We are now back on the record.
11:01:40 9 The time is approximately 11:02 a.m.
11:01:42 10 BY MR. KAHN:
11:01:42 11 Q All right. I want to -- the document that
11:01:45 12 you walked out of the -- you walked out of the room
11:01:46 13 with that document; right?
11:01:48 14 A Right.
11:01:48 15 Q And had a discussion with Mr. Countryman?
11:01:52 16 A Yup.
11:01:52 17 MR. KAHN: I just -- I want to mark it as
11:01:53 18 Plaintiff's Exhibit No. 1. Let me just --
11:01:56 19 (HOA FEE PROPOSAL MARKED PLAINTIFF'S EXHIBIT
11:01:56 20 NO. 1 FOR I.D.)
11:01:56 21 BY MR. KAHN:
11:01:56 22 Q And what -- what did you all talk about?
11:01:58 23 MR. COUNTRYMAN: Don't answer that question.
11:01:59 24 That's --
11:01:59 25 A (Continuing) It's client privileged.

11:02:01 1 MR. COUNTRYMAN: -- privileged.
11:02:01 2 THE WITNESS: Right?
11:02:01 3 MR. COUNTRYMAN: I'm telling you not to
11:02:02 4 answer it because it's attorney-client privileged.
11:02:03 5 THE WITNESS: Right.
11:02:03 6 MR. COUNTRYMAN: The document was not
11:02:04 7 properly identified under Rule 30(j)(8), two days or
11:02:08 8 more ahead of the deposition.
11:02:10 9 And, Justin, we've talked about this issue at
11:02:12 10 length. I sent you multiple letters on the issue:
11:02:15 11 Providing a 67-page spreadsheet identifying probably a
11:02:18 12 100,000 documents, in my view, does not sufficiently
11:02:22 13 identify this document under 30(j)(8).
11:02:24 14 MR. KAHN: I understand that we disagree
11:02:26 15 about that. I -- this document was produced and
11:02:28 16 identified way before two days ago. And under the
11:02:32 17 rules, you're not allowed to talk with the
11:02:34 18 witness is --
11:02:35 19 MR. COUNTRYMAN: When was it identified more
11:02:36 20 than two days ago?
11:02:37 21 MR. KAHN: -- is my position. And I
11:02:38 22 understand you disagree, and we're just going to move
11:02:39 23 forward and let a judge deal with your conduct.
11:02:42 24 BY MR. KAHN:
11:02:42 25 Q When did -- what kind of retainer did you

11:02:44 1 give Mr. Countryman? Did you pay him a retainer?
11:02:47 2 A No.
11:02:48 3 Q Have you signed any kind of legal retainer
11:02:50 4 agreement with him?
11:02:50 5 A No.
11:02:51 6 Q Have you hired him to be your lawyer?
11:02:55 7 A No.
11:02:56 8 Q Okay. So tell me what you all discussed.
11:02:58 9 MR. COUNTRYMAN: Don't answer that. I am
11:03:00 10 your lawyer.
11:03:01 11 MR. KAHN: All right. Well, we'll have a
11:03:03 12 judge deal with that later.
11:03:04 13 MR. COUNTRYMAN: Okay.
11:03:05 14 BY MR. KAHN:
11:03:05 15 Q Now that you've seen Plaintiff's Exhibit
11:03:06 16 No. 1, you see the second paragraph, where it states
11:03:12 17 "No fee will" -- the last sentence, where it states "No
11:03:15 18 fee will be charged to the HOA if McCabe, Trotter &
11:03:18 19 Beverly, P.C., is unsuccessful in collecting"?
11:03:22 20 Do you see that?
11:03:22 21 A Uh-huh. Yeah, I see it.
11:03:23 22 Q All right. Have you seen language like this
11:03:27 23 before in any of the documents that you had access to
11:03:32 24 while working for either Rodgers Townsend or McCabe
11:03:38 25 Trotter?

15:01:53 1 A Right.

15:01:54 2 Q Okay. Now, in terms of -- I'm going to show
15:01:56 3 you what I've marked as Plaintiff's --

15:01:57 4 MR. COUNTRYMAN: Justin, I'm sorry to
15:01:57 5 interrupt, but it is 3:00, and I got to get on the
15:01:59 6 road. So I'm going to have to end the deposition.

15:02:02 7 MR. KAHN: All right. Well, I don't agree to
15:02:05 8 that.

15:02:06 9 MR. COUNTRYMAN: Okay. That's fine.

15:02:08 10 MR. KAHN: So I'll continue.

15:02:10 11 MR. COUNTRYMAN: No. You don't have to stay
15:02:11 12 here.

15:02:12 13 Sheri, I'm your lawyer, correct, for this
15:02:14 14 deposition?

15:02:15 15 THE WITNESS: Yes.

15:02:15 16 MR. KAHN: No. That's objection. She --
15:02:16 17 the witness has asked and answered -- has answered that
15:02:17 18 as "No."

15:02:18 19 MR. COUNTRYMAN: When we talked yesterday and
15:02:19 20 talked before, it was with the understanding that what
15:02:21 21 we said was privileged and confidential; correct?

15:02:25 22 THE WITNESS: Yes.

15:02:25 23 MR. KAHN: Objection.

15:02:26 24 Hold on a second, now. You can't -- I'm
15:02:27 25 still asking questions. You don't get to ask

15:02:30 1 questions. And if you're going to ask about it, then
15:02:32 2 I'm going to ask you about these conversations you had
15:02:34 3 since he just opened the door.
15:02:36 4 BY MR. KAHN:
15:02:36 5 Q So when did you meet with Mr. Countryman?
15:02:38 6 MR. COUNTRYMAN: This deposition is over.
15:02:42 7 MR. KAHN: All right. Well, I'm staying
15:02:42 8 here.
15:02:43 9 MR. COUNTRYMAN: Okay.
15:02:43 10 MR. KAHN: All right. Well --
15:02:44 11 BY MR. KAHN:
15:02:44 12 Q I'm going to show you what --
15:02:44 13 MR. COUNTRYMAN: The witness is not. The
15:02:46 14 witness is going to --
15:02:47 15 (DEMAND PACKAGE MARKED PLAINTIFF'S EXHIBIT
15:02:47 16 NO. 17 FOR I.D.)
15:02:47 17 BY MR. KAHN:
15:02:47 18 Q I'm going to show you what I've marked as
15:02:49 19 Plaintiff's Exhibit No. 17.
15:02:50 20 MR. COUNTRYMAN: Sheri, you don't have to
15:02:52 21 stay here.
15:02:53 22 THE WITNESS: I've got stuff to do.
15:02:58 23 BY MR. KAHN:
15:02:58 24 Q If the attorney told you not to leave, would
15:03:04 25 you stay? The attorney just told you, you don't have

15:03:06 1 to stay here. If he said you did have to stay

15:03:08 2 here would you stay here?

15:03:08 3 MR. COUNTRYMAN: You can get up, and you

15:03:10 4 don't have to answer that question.

15:03:11 5 THE WITNESS: Yeah. I'm going to go.

15:03:14 6 MR. KAHN: Okay.

15:03:14 7 THE WITNESS: I'm going on my free will.

15:03:16 8 BY MR. KAHN:

15:03:16 9 Q Well, you're -- it sounds like you're going

15:03:18 10 on the instruction of Mr. Countryman.

15:03:20 11 Do you agree that both you and the lawyer you

15:03:23 12 work for agreed to appear at this deposition a long

15:03:26 13 time ago when I talked with you all?

15:03:31 14 A I can go get him.

15:03:33 15 Q He is not here to be deposed, as far as I

15:03:36 16 know.

15:03:36 17 A Yeah.

15:03:40 18 MR. KAHN: All right. Well, I guess this

15:03:41 19 deposition will be continued based on a court order,

15:03:42 20 and we can deal with that later on.

15:03:47 21 MR. COUNTRYMAN: As far as I'm concerned,

15:03:48 22 the deposition is terminated.

15:03:50 23 MR. KAHN: I don't agree, and we can deal

15:03:52 24 with the Court on that.

15:03:54 25 MR. COUNTRYMAN: Okay.

15:03:58 1 VIDEOGRAPHER: This concludes the video
15:03:59 2 deposition of Sheri L. Self for today, January 24th,
15:04:04 3 2019. The time is approximately 3:04 p.m. We are now
15:04:07 4 off the record.

15:07:32 5 (The deposition recessed briefly.)

15:07:33 6 MR. KAHN: Opposing counsel has walked out of
15:07:34 7 this deposition, I believe, in violation of the rules,
15:07:39 8 and we can take the matter up with the Court.

15:07:45 9 During the deposition, the witness marked on
15:07:48 10 a piece of paper that I handed her, and I'm going to
15:07:51 11 mark that document as Plaintiff's Exhibit No. 18.

15:07:55 12 (HANDWRITTEN NOTES MARKED PLAINTIFF'S EXHIBIT
15:07:55 13 NO. 18 FOR I.D.)

15:07:55 14 MR. KAHN: I think her testimony generally
15:07:57 15 related to some kind of checklist, or something like
15:07:59 16 that, earlier on in the deposition. So I've marked a
15:08:01 17 piece of paper that the witness had written on as
15:08:04 18 Plaintiff's Exhibit No. 18.

15:08:08 19 Off the record.

15:09:06 20 (The deposition recessed briefly.)

15:09:06 21 (PLAINTIFF'S NOTICE OF VIDEOTAPED DEPOSITION
15:09:06 22 OF SHERI SELF MARKED PLAINTIFF'S EXHIBIT NO.
15:09:07 23 19 FOR I.D.)

15:09:12 24 MR. KAHN: Further -- further, I'm going to
15:09:15 25 mark as Plaintiff's Exhibit No. 19, the deposition

15:09:19 1 notice that was provided to opposing counsel, and he
15:09:25 2 accepted, by consent, as correspondence would reflect.

15:09:32 3 But this is the deposition notice that this
15:09:34 4 deposition took place pursuant to -- by agreement of
15:09:40 5 the witness, the attorney she works for in this office,
15:09:43 6 and Mr. Countryman.

15:09:46 7 And at no place in this deposition does it
15:09:51 8 limit the time, scope of the deposition, and at no time
15:09:56 9 before -- and the record will reflect -- it was
15:10:00 10 sometime around noon today that Mr. Countryman
15:10:02 11 indicated that this deposition would have to end by or
15:10:06 12 around 3:00.

15:10:08 13 Instead, he simply stated that on the -- I
15:10:13 14 can't remember if it was on the record, but simply told
15:10:16 15 us that it would be ending around 3:00. I don't know
15:10:20 16 that he stated a reason. The record will reflect that
15:10:24 17 one way or another.

15:10:24 18 But, again, this deposition has been ended
15:10:30 19 without my consent, permission, or -- and I think in
15:10:35 20 violation of the rules, and I think I've preserved what
15:10:39 21 I can for the Court to look at the various issues of --
15:10:42 22 that have arisen in this deposition that, I think,
15:10:44 23 violate the rules.

15:10:46 24 Off the record.

15:12:23 25 (The deposition recessed briefly.)

15:12:23 1 MR. KAHN: Further, we've had -- I've brought
15:12:27 2 additional documents to review through -- with this
15:12:29 3 witness, that she would have generated or created.
15:12:32 4 I've been deprived of the opportunity to ask her about
15:12:34 5 these.

15:12:36 6 Further, we -- I came here the night before
15:12:39 7 in order to make sure we were here timely. And I do
15:12:55 8 not consider the deposition terminated. We plan on
15:13:00 9 discussing this matter with the Court, and we'll go
15:13:03 10 from there.

11 (Deposition was adjourned at 3:13 p.m.)

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2016-CP-18-1001
	)	
TAMMY C. RICHARDSON,	)	
	)	
Plaintiff,	)	MCCABE, TROTTER & BEVERLY, P.C.'S
	)	MOTION FOR PROTECTIVE ORDER
vs.	)	(DEPOSITION OF SHERI SELF)
	)	
HALCYON REAL ESTATE SERVICES, LLC	)	
and MCCABE, TROTTER & BEVERLY,	)	
P.C.,	)	
	)	
Defendants.	)	
_____	)	

Defendant McCabe, Trotter & Beverly, P.C. ("MTB"), by and through its undersigned counsel, submits this Motion for a Protective Order pursuant to SCRPC 26(c), 30(d) and 30(j) prohibiting Plaintiff's counsel from questioning Sheri Self regarding attorney-client privileged information. MTB also seeks sanctions under Rule 37. MTB shows the Court the following:

Background

MTB is a law firm that, among other things, performs collections actions for HOAs. Plaintiff was a defendant in a lien collections action that MTB pursued for her HOA after she failed to pay HOA assessments for many years without reason. Instead of paying what she owed, Plaintiff sought counsel and sued MTB for violation of the Fair Debt Collections Practices Act, 15 U.S.C. § 1692 ("FDCPA").

Sheri Self used to work at MTB as a paralegal and now works as a legal assistant at a law firm in Macon, Georgia. Without going through MTB's counsel, Plaintiff's counsel contacted Ms. Self directly to discuss the case. Plaintiff's counsel decided to take her deposition. The deposition was set



by agreement and without requiring domestication of a subpoena to take place in Macon, Georgia on January 24, 2019, via a deposition Notice served on November 13, 2018. Ex. 1. The Notice "identified" and "reserved the right" to any documents produced or made available in discovery by any party during the deposition under SCRCP 30(j)(8):

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(j)(8), SCRCP, counsel for the Plaintiff hereby identifies and reserves the right to use any documents produced or made available in discovery by any party during this deposition, and hereby gives notice of the Plaintiff's intent to question the witness regarding all documents produced, identified or made available by any party during the course of discovery, as well as those obtained pursuant to subpoena or records request.

The court has certified this case as a class action, and the parties have exchanged thousands of documents in discovery to date.

The next day (and two months before the deposition was to take place), counsel for MTB sent Plaintiff's counsel a letter regarding the documents and Rule 30(j)(8):

COUNTRYMAN LAW FIRM

LITIGATION ♦ MEDIATION

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November 14, 2018

Via Email Only:

Justin S. Kahn
Kahn Law Firm, LLP
562 Savannah Hwy
Charleston, SC 29407
jskahn@kahnlawfirm.com

Re: Richardson v. McCabe, Trotter & Bererly, P.C., et al.
C/A No.: 2016-CP-18-1001
CLF File: 00006 -- 00008

Dear Justin:

The Notices for the depositions you recently set all refer to any documents produced and made available in discovery as documents you might use in the depositions under SCRCP 30(j)(8). This Rule states that if deposing counsel provides or otherwise identifies the documents to be used during the deposition at least two business days before the deposition, then the witness and the witness' counsel do not have the right to discuss the documents privately before the witness answers questions about them. If deposing counsel does not provide or identify the documents ahead of time, then counsel and the witness may have a reasonable amount of time to discuss the document before the witness answers questions concerning it.

The purpose of the Rule is to avoid surprise and wasting time during a deposition. Thousands and thousands of documents have been produced in discovery in this case. Blanketly referring to all of them does not comport with the letter or spirit of the Rule. Unless you identify or produce specific material you actually plan to use in the depositions two days beforehand, I reserve the right to discuss material presented to the witnesses privately during the deposition(s).

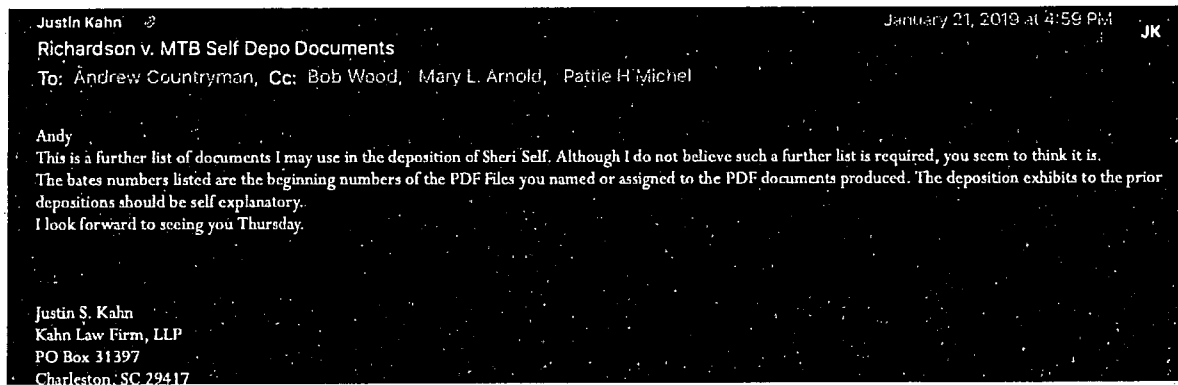
Sincerely,



Andrew W. Countryman

The letter explained that naming all the thousands of documents produced in discovery was insufficient to identify documents to be used during the deposition under SCRCP 30(j)(8). Further, it specified that if Plaintiff's counsel failed to produce or identify the documents he really planned to use two days prior to the deposition (something other than merely referencing all material exchanged in discovery) MTB's counsel reserved the right and planned to discuss the material with the witness under Rule 30(j)(8). Plaintiff's counsel never responded to the letter.

At 4:59 p.m., January 21, 2019, Plaintiff's counsel sent an email with a 67-page spreadsheet (Ex. 2) he characterized as a "further list of documents" he "may use" in the deposition:



The spreadsheet referenced all the exhibits used in depositions taken previously in the case, all discovery responses of MTB, MTB's Answer and referenced thousands and thousands of pages of material produced in discovery.

Counsel for MTB represented the witness regarding the deposition, as she was a former MTB employee being deposed about her work at MTB. The undersigned met with the witness to prepare for the deposition. The undersigned had no clue what material Plaintiff's counsel planned to use during the deposition with the witness based on his identification of all material exchanged in discovery. This is not a new issue in this case. Plaintiff's counsel has exhibited a continued practice of refusing to produce or identify material he actually plans to use in depositions prior to them other

than referencing all material produced in discovery. The undersigned has made it very clear this does not give counsel or the witness any idea what material might actually be used in the deposition and actually creates a situation where Plaintiff's counsel surprises the witness with documents with which they are not familiar.

For almost all of the approximately 15 exhibits used in Ms. Self's deposition, the undersigned took a brief recess to discuss the document privately with the witness under SCRCP 30(j)(8). Upon information and belief, no break was longer than 3-4 minutes. Every time they returned from break, Plaintiff's counsel asked the witness what she discussed with counsel. Every time, the undersigned instructed the witness not to answer based on attorney-client privilege pursuant to Rule 30(j)(8).

Argument

"The entire thrust of South Carolina's discovery rules involves full and fair disclosure, 'to prevent a trial from becoming a guessing game or one of surprise for either party.'" Samples v. Mitchell, 329 S.C. 105, 495 S.E.2d 213 (Ct. App. 1997), *quoting* Hodge v. Meyers, 255 S.C. 542, 180 S.E.2d 203 (1971). In simple terms, the core purpose of discovery is to obtain the *truth*. *See, e.g., Samples, supra*. The rights of discovery the Rules provide give the trial lawyer the means to prepare for trial, and when these rights are not accorded, prejudice is assumed. Downey v. Dixon, 294 S.C. 42, 362 S.E.2d 317 (Ct. App. 1987).

SCRCP 30(j)(8) is in place to prevent surprises during depositions and allow witnesses to testify knowledgeably regarding material presented to them. The Rule says that if a lawyer conducting a deposition provides or identifies material he plans to use with the witness two days ahead of the deposition, the witness and her lawyer may not discuss the material during the deposition. Otherwise, the witness and her lawyer may.

(8) Deposing counsel shall provide to opposing counsel a copy of all documents shown to the witness during the deposition, either before the deposition begins or contemporaneously with the showing of each document to the witness. If the documents are provided (or otherwise identified) at least two business days before the deposition, then the witness and the witness' counsel do not have the right to discuss the documents privately before the witness answers questions about them. If the documents have not been so provided or identified, then counsel and the witness may have a reasonable amount of time to privately discuss the documents before the witness answers questions concerning the document.

Identifying or producing documents under Rule 30(j)(8) prevents surprise and allows witnesses to testify knowledgeably regarding material presented to them in a deposition.

a. Plaintiff's identification of all material produced in discovery does not comply with the Rule.

More than two months prior to Ms. Self's deposition, counsel for MTB plainly and in writing told Plaintiff's counsel that referencing all material produced in discovery was not sufficient to identify material he planned to use in the deposition under Rule 30(j)(8). Counsel for MTB indicated that unless Plaintiff's counsel made a real effort to identify or produce material he actually planned to use, MTB's counsel reserved the right and planned to discuss material presented to the witness during the deposition.

Plaintiff's counsel ignored the November 14, 2018, letter. Instead of responding to it, he sent an email the Monday evening before the Thursday deposition (again) identifying everything produced in discovery, including a 67-page spreadsheet listing thousands of documents and referencing all material used in prior depositions. This was not an attempt to provide documents he planned to use during the deposition so the witness could knowledgeably testify about them. This was an attempt to hide what he actually planned to use and surprise the witness.

Plaintiff's counsel refused to address the issue substantively during the deposition. MTB's counsel indicated he did not consider the identification of all material produced in discovery or the 67-page spreadsheet as sufficient identification of material under SCRCP 30(b)(6). Plaintiff's counsel never would have a substantive discussion with counsel for MTB about the issue. He refused

to address how his tactics were anything other than efforts to surprise the witness and keep what material he planned to use with her secret. Counsel for MTB offered to quickly review all material Plaintiff's counsel planned to use during the deposition with the witness as once. Plaintiff's counsel refused. This caused significant and unnecessary delay in the deposition.

Plaintiff's counsel's blanket identification of all material exchanged in discovery, his 67-page spreadsheet listing various material produced in the case and referencing all deposition exhibits used in the case to date did not to comply with Rule 30(j)(8). Plaintiff's counsel never intended to use all material exchanged in discovery or all exhibits to every prior deposition in the case, and in fact, he only used a small select portion of material with the witness. He refused to provide any good faith indication prior to the deposition of what specific documents he planned to use and instead only referred to the thousands of documents exchanged in discovery. Plaintiff's counsel clearly intended to surprise the witness and use documents with her with which she was unfamiliar get soundbites and "gotcha" answers from her.

Counsel for MTB, after stating his position on the record (and after two letters and at least two attempts to discuss the issue to prevent interrupting the deposition), appropriately took a reasonable amount of time (approximately 15 minutes) under Rule 30(j)(8) to review the exhibits with the witness. Under the Rule, the conversation between counsel and the witness during this time was confidential and privileged. Counsel for MTB therefore appropriately directed the witness not to answer the question, "What did you talk about?" following the private meeting.

b. Sanctions

SCRCP Rule 37 provides for sanctions against a lawyer whose conduct necessitates a discovery motion. Such sanctions shall include attorney's fees and reasonable expenses incurred obtaining the order. Such sanctions are appropriate here.

Plaintiff's counsel refused to make any good faith effort to provide material he actually planned to use in the deposition prior to it. Instead, he his material he planned to use by referring to all material exchanged in discovery and then sending a 67-page spreadsheet listing thousands more documents shortly before the deposition. Plaintiff's counsel only used a select number of exhibits, which upon information and belief, was around 15 (the transcript has not been produced yet).

Plaintiff's counsel's intent was clearly to conceal what he truly planned to use as deposition exhibits and surprise the witness to obtain soundbite answers. This has been a continuing problem during depositions in this case. Plaintiff's counsel's pattern of behavior is to: (a) identify all material exchanged in discovery as potential deposition exhibits, (b) ignore MTB's counsel's contention that identifying material in that manner is insufficient under SCRCp 30(j)(8), then (c) try to surprise witnesses in depositions with documents they have not reviewed and with which they are not familiar in attempts to get "gotcha" answers. This is actually the second Motion for Protective Order pending before the Court on this very issue.

Conclusion

From the beginning, MTB's counsel has only sought to obtain material prior to the deposition that may be used in the deposition as the Rules provide so the witness can be familiar with it prior to the deposition. This would allow the witness to testify knowledgeably regarding the exhibits. However, Plaintiff's counsel's objective is not to obtain the truth or properly identify material so the witness could be familiar with it during the deposition. It is to hide the true documents he planned to use by identifying thousands and thousands of documents exchanged and otherwise used in discovery with the plan of obtaining soundbites he could use to benefit his case.

Plaintiff's identification of material under Rule 30(j)(8) did not comply with the Rule. Because Plaintiff's counsel did not provide or identify material he actually planned to use with the witness two days prior to the deposition, MTB's counsel had the right under Rule 30(j)(8) to discuss the material with the witness privately during the deposition. Therefore, the Court should protect the witness from having to answer the questions asking what she discussed with counsel during the meeting regarding the documents during the deposition. Additionally, Plaintiff's counsel's tactics were contrary to the the discovery rules, which are designed to prevent surprise and find the truth. The Court should award sanctions in the form of costs and attorney's fees in favor of MTB for having to file and argue this Motion. MTB may supplement this Motion with affidavit(s) and/or briefs as appropriate.

Respectfully submitted,

By: /s/ Andrew W. Countryman
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**Counsel for McCabe, Trotter &
Beverly, P.C.**

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

COURT OF COMMON PLEAS
CASE No. 16-CP-18-1001

TAMMY C. RICHARDSON,

PLAINTIFF,

v.

HALCYON REAL ESTATE SERVICES,
LLC AND McCABE, TROTTER &
BEVERLY, P.C.,

DEFENDANTS.

PLAINTIFF'S NOTICE AND
MOTION FOR SANCTIONS AND
MEMORANDUM IN SUPPORT THEREOF
CONCERNING IMPROPER DEPOSITION
CONDUCT OF MTB COUNSEL

PLEASE TAKE NOTICE THAT at such time and place as may be set by the Court, Plaintiff, by and through her counsel, will move for an order seeking relief, including sanctions against Defendant and its counsel, the continuation of certain depositions, the award of attorney's fees and costs and granting such other and further relief as is deemed just and proper.

This motion is brought pursuant to Rule 37, SCRCP and other law.

P

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I. CONCISE SUMMARY OF THE BASIS OF THE MOTION.

This motion seeks a Court Order redressing discovery abuse and misconduct committed by defense counsel along with an MTB attorney who participated in the misconduct. Counsel for MTB has disrupted depositions, engaged in witness coaching during depositions to have impermissible off-the-record discussions with

witnesses about documents that were previously produced and improperly instructed a witness to leave a deposition before it concluded.

The relief sought includes:

1. Ordering the continuation of the depositions of MTB employee Haylen Gatling and former employee Sheri Self and paying the associated costs and attorney's fees for having to retake and continue the same;
2. Directing witnesses to testify in full as to the matters discussed with MTB Counsel during off-record conversations;
3. Ordering the deposition of Stephanie Trotter, an attorney who engaged in the improper witness coaching with counsel for MTB during the deposition of Haylen Gatling;
4. Ordering MTB's counsel to cease and desist from similar conduct in the future; and
5. Sanctions for engaging in improper conduct repeatedly during the depositions, engaging in off-the-record witness coaching, obstructive conduct and otherwise in violation of the deposition conduct rules.

II. NATURE OF THE CASE.

This is a class action Fair Debt Collection Practices Act ("FDCPA") and Unfair Trade Practices Act lawsuit brought against the law firm of McCabe, Trotter & Beverly, P.C. (MTB), whose primary practice is the collection of allegedly past due homeowners assessments on behalf of homeowners associations (HOAs). The suit claims MTB routinely misrepresents the amount of money consumers actually owe their HOAs by making up amounts of attorney's fees

claimed owed and then using the bogus numbers to threaten foreclosure, forcing homeowners to choose between paying MTB or losing their home.

This scheme impacts thousands of South Carolina residents and generates millions for MTB. Its improper debt collection practices include generating thousands of form letters falsely claiming hundreds or thousands of dollars in attorney's fees are owed to the HOAs when they are not, filing notices of liens repeating those misrepresentations, and then foreclosing on homes to collect the bogus fees. The misrepresentations begin with MTB's unsigned form letter telling homeowners they "currently" owe their HOAs hundreds of dollars in attorney's fees and failing to disclose that MTB only charges the HOA no more than \$65.

Exemplar testimony of Stephanie Trotter, Esq., who runs MTB's HOA collections efforts, succinctly makes the point:

9 Q How long has your law firm been sending out 10 letters to consumers saying that the attorney's fees 11 are greater than the amounts your law firm has been 12 billing the homeowners associations? 13 A Since August of 2012, when we opened.
--

Ex. 1 Dep. Trotter, p. 167.

Plaintiff Tammy C. Richardson is one of the few to successfully challenge the collection practices. Despite the false claims made by MTB about her and her alleged indebtedness, she successfully defended herself against the improper collection practices and the foreclosure action MTB brought against her. In the end, her HOA admitted she did nothing wrong, she successfully fought MTB's

attempts to take her home, and she was able to bring an action on behalf of her and others that seeks to hold this law firm to account for its acts.

The present motion is Plaintiff's attempt to combat yet one more way MTB tries to bully consumers.

III. ARGUMENT

The South Carolina deposition conduct rules boil down to "if you can't do it in front of a judge, you shouldn't do it in a deposition."

A. PROHIBITED CONDUCT DURING DEPOSITIONS

The Supreme Court has warned lawyers that their conduct in depositions can result in ethical violations and sanctions. *In the Matter of Anonymous Member of the South Carolina Bar*, 346 S.C. 177, 552 S.E.2d 10 (2001). South Carolina adopted deposition conduct rules derived from *Hall v. Clifton Precision*, 150 F.R.D. 525 (E.D. Pa 1993). Having adopted the *Hall* approach, our Court requires attorneys to operate under one of the most sweeping and comprehensive rules on deposition conduct in the nation. *In re Anonymous Member of S.C. Bar*, at 190, 16.

Prohibited conduct includes off-the record conferences, suggestive objections and interjections and instructions not to answer. There are various additional contempt powers available to the trial court when counsel violates the Rules.

In addition to their traditional contempt powers, judges may issue orders as a sanction for improper deposition conduct: (1) specifying that designated facts be taken as established for purposes of the action; (2) precluding the introduction of certain evidence at trial; (3) striking out pleadings or parts thereof; (4) staying further proceedings pending the compliance with an order that has not been followed; (5) dismissing the action in full or in part; (6) entering default judgment on some or all the claims; or

(7) an award of reasonable expenses, including attorney fees. *Id.* Among the costs a judge may deem appropriate could be those incurred for future judicial monitoring of depositions or payment for the retaking of depositions. Our judges must use their authority to make sure that abusive deposition tactics and other forms of discovery abuse do not succeed in their ultimate goal: achieving success through abuse of the discovery rules rather than by the rule of law.

Id. at 194, 18. Attorneys who cross the line during a deposition, do not promote the “just, speedy, and inexpensive determination of every action.” *Id.*

During a deposition, the only permissible discussion between counsel and a witness that may take place if it does not involve deciding whether to assert privilege is to discuss **a previously undisclosed document**. *In re Anonymous Member of S.C. Bar*, at 190-191, 16.

MTB counsel wrongly and repeatedly stopped depositions to engaged in off-the-record witness coaching and discuss with the witness previously produced documents. MTB counsel improperly argues that if deposing counsel does not identify **the exact documents** to be used for each deposition, **even when those materials have been previously produced in discovery**, MTB counsel can stop the deposition to discuss the previously produced document off-the-record with the witness.²

The Court should not hesitate to use its power to end such conduct. MTB counsel repeatedly engaged in prohibited conduct to further its goal of disrupting

² MTB Counsel claims it is “not sufficient [for deposing counsel] to identify material he planned to use in the deposition under Rule 30(j)(8).” MTB Motion for Protective Order (Haylen Gatling) Jan. 21, 2019, p. 6.

the discovery process and impede the process. MTB counsel filed frivolous motions seeking protection from questioning about documents previously produced and off-the-record discussions with witnesses. Interestingly, defense counsel fails to cite to the Court the controlling case in this jurisdiction prohibiting such conduct in violation of Rule 3.3 Candor Toward the Tribunal.³

The law is clear: Conferences called to assist a witness in framing an answer, to calm down a nervous client, or to interrupt the flow of a deposition are improper and warrant sanctions. *In re Anonymous Member of S.C. Bar*, at 191, 17. The issues squarely before the Court relate to repeated violations of principles stated in THE case setting the bar governing attorney conduct in depositions in South Carolina.

B. OFF-THE-RECORD DISCUSSION WITH WITNESS ABOUT PREVIOUSLY PRODUCED DOCUMENTS PROHIBITED

Once a deposition begins, an attorney and a client may have an off-the-record conference *only when deciding whether to assert a privilege or to discuss a previously undisclosed document*. *In re Anonymous Member of S.C. Bar*, at 190-191, 16 (emphasis added).

Defense counsel violated the Supreme Court's deposition conduct order because when previously disclosed documents were presented to the deponent, defense counsel stopped the deposition without stating a permissible reason,

³ Rule 3.3: Candor Toward the Tribunal (a)(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel.

engaged in prohibited off-the-record witness coaching and then did not allow permitted inquiry into the meeting.

As discussed herein, if there is a permissible basis for meeting with a witness during a deposition, before meeting with the witness to discuss the previously produced document, counsel must state a need to discuss asserting a privilege.⁴ As this did not occur, defense counsel repeatedly engaged in prohibited witness coaching and violation of the Supreme Court deposition conduct pronouncement.

There are multiple examples of the impermissible conduct in the depositions. Below are examples after the witness was shown a previously disclosed document.

10 MR. COUNTRYMAN: And I'm going to tell her
11 not to answer that **before we discuss it.**
12 BY MR. KAHN:
13 Q Do you see that sentence?
14 MR. COUNTRYMAN: **So don't answer that.**
15 MR. KAHN: All right. I --
16 MR. COUNTRYMAN: **Come with me. We're going**
17 **to chat about it.**
18 MR. KAHN: I don't understand the basis of
19 your objection. These -- **this document has been**
20 **previously produced; right?**
21 MR. COUNTRYMAN: **Yup.**
22 MR. KAHN: All right. And **you think the**

⁴ Defense counsel acknowledges that each document at issue was previously produced. *See e.g.* Ex. 2 Self Dep. p. 94.

23 rules allow you to talk with a witness about a document
24 that has been previously produced or identified?
25 MR. COUNTRYMAN: Yes.

Ex. 2 Self Dep. p. 21.

9 MR. KAHN: This has been previously been
10 marked as Trotter No. 24, which is a document we've
11 produced and provided and been used in the past.
12 MR. COUNTRYMAN: I'm going to talk to her
13 about it before you ask any questions.

Ex. 2 Self Dep. p. 172.

BY MR. KAHN:

Q And if you look at the second page -- is this
a document that you would have printed as well?

A Yes.

MR. COUNTRYMAN: Sheri, I'm going to talk to
you about this before you answer questions about it

MR. KAHN: All right. Again, I think that
violates the rules.

Ex. 2 Self Dep. p. 113.

There are many examples of the improper conduct in the depositions attached. *See e.g.*, Ex. 2 Self Dep. pp. 104, 122-123, 177. There was no legitimate basis to meet with the witness. Every document presented was previously produced, most by MTB. Most of the documents have been used in prior depositions or were created by the witness.

5 [MR. COUNTRYMAN] ... I'm taking a
6 brief amount of time to go over the document with the
7 witness before she discusses questions about it with
8 you.
9 MR. KAHN: And the rules specifically -- in
10 the South Carolina Supreme Court specifically prohibit
11 you from engaging in the conduct you have described.
12 And the basis of what you have asserted, which is to
13 review documents that you claim I sprung on you as a
14 surprise, is not a basis to have an off-the-record
15 conference, and you are in violation of the rules.
16 These documents have been produced throughout
17 discovery by McCabe Trotter. There's no surprise here.
18 This is a witness who prepared the documents. But
19 subject to all of that, we can let a judge deal with
20 it.

Ex. 2 Dep. Self p. 157.

Contrary to the Supreme Court's clear instruction that there are to be no off-the-record discussions about previously produced documents, MTB's counsel acts as if after a deposition begins, counsel can ignore the rules, take the witness out of the room and have off-the-record discussions about previously produced documents even when the discussions are not for the purpose of deciding whether to assert a privilege. Nothing in *In Re Anonymous* supports this.

1. *Before a Conference for Limited Purpose of Asserting Privilege or Discussing Newly Produced Document, Counsel Should Note Why a Conference is Needed on the Record.*

If there is a permissible basis, "[b]efore beginning such a conference, the deponent's attorney should note for the record that a break is needed to discuss the possible assertion of a privilege or a newly produced document." *In re Anonymous Member of S.C. Bar*, at 191, 16. MTB counsel failed to comply.

BY MR. KAHN:

6 Q Do you see on the second page where your
7 initials appear?

8 MR. COUNTRYMAN: Going to talk to her about
9 this before she answers any questions on it. If you
10 have anything else you want me to go over with her, I'm
11 happy to do that since --

12 MR. KAHN: I don't think the rules require
13 that. I think what you're doing is improper. So we
14 can --

15 MR. COUNTRYMAN: That's fine. But I'm doing
16 it. So I'm telling that ahead of time. If you want me
17 to go over them with -- with her now, I'll do that. If
18 not, then you can waste more time doing it over the
19 next 30 minutes. That's fine.

Ex. 2 Self Dep. p. 194.

MTB counsel failed to note for the record a basis allowed by the Supreme Court to meet with the witness. MTB counsel engaged in prohibited conduct.

2. *After A Conference for the Limited Purpose of Asserting Privilege or to Discuss a Newly Produced Document, Counsel Should Note the Decision Reached.*

After a permissible conference, the conferencing attorney should state on the record why the conference occurred, and the decision reached. If the party decides to assert a privilege, the basis for the privilege should be clearly stated. *In re Anonymous Member of S.C. Bar*, at 191, 16.

There was no permissible basis and Defense counsel failed to state a one. The documents were not newly produced and there was no discussion of the possible assertion of privilege. Instead, MTB counsel decided to interrupt the deposition, engage in improper witness coaching and ignore the Supreme Court.

3. *Following a Conference, Counsel May Inquire Into the Subject to Determine if There Was Witness Coaching.*

When there is an off-the-record conference, whether or not a privilege is asserted, deposing counsel may inquire on the record into the subject of the conference to determine if there has been any witness coaching. *In re Anonymous Member of S.C. Bar*, at 191, 16. Attempts were made to learn what happened between the witness and counsel during the breaks to review the previously produced documents.

22 Q And what -- what did you all talk about?

23 MR. COUNTRYMAN: Don't answer that question.

Ex. 2 Self Dep. pp. 22.

Defense counsel repeatedly blocked similar inquiry into the improper discussions that took place. *See e.g.*, Ex. 2 Self Dep. pp. 95, 113, 118, 123, 148, 151, 156, 161, 172, 183, 186, 205.

The impermissible conferences and witness coaching repeatedly took place and permitted inquiry was blocked. The truth seeking function of the depositions and witnesses became tainted by the improper conduct. Sanctions are justified.

C. THERE IS NO PRIVILEGE TO CLAIM; THUS, A LAWYER CANNOT DISCUSS PREVIOUSLY DISCLOSED DOCUMENTS WITH A WITNESS DURING A DEPOSITION.

As to Haylen Gatling, defense counsel does not argue there was an attempt made to decide whether to assert a privilege. Instead, it is argued he “took a reasonable amount of time (approximately 15 minutes) under Rule 30(j)(8) *to review the exhibits with the witness.*” MTB Motion for Protective Order (Gatling) Jan. 21, 2019, p. 7. (emphasis added). *See e.g.* Ex. 3 Gatling Dep. pp. 182-186 where defense counsel stopped the deposition repeatedly and talked with the witness about previously produced documents (Ex. 4).

5 MR. KAHN: I think that absolutely violates
6 the rule. We'll let the judge deal with it.
7 MR. COUNTRYMAN: And I don't really care what
8 you think.
9 MR. KAHN: I understand. That's why we have
10 judges.

Ex. 3 Gatling Dep. p. 185.

The Supreme Court and rules do not support the actions and contention by defense counsel of an entitlement to know with certainty before the deposition *each document to be used, regardless of whether they had been produced or identified.*

This Court should sanction defense counsel, the defendant and deny the requested protection and sanctions sought by MTB.

D. MULTIPLE OFF-THE-RECORD WITNESS COACHING DISCUSSIONS ABOUT PREVIOUSLY PRODUCED DOCUMENTS ARE IMPROPER.

An example of the effects of the improper witness coaching include Haylen Gatling's change of testimony following a meeting with defense counsel and Stephanie Trotter, Esq. of MTB. Ms. Gatling testified she printed documents, including various pieces of a form letter package and "would pull two of the pages, the notice of lien and the witness page" and put those in a box with others for Attorney Trotter to review. Ex. 3 Dep. Gatling p. 175, 17-23; p. 176, 2-6.

After meeting with defense counsel and MTB attorney Trotter to discuss the documents, the witness testified she had suddenly "misremembered" the way documents were put in the box for the attorney (Stephanie Trotter) to sign. Ex. 3 Gatling Dep. pp. 199-200. The impropriety of the meetings was noted. *See. e.g.* Ex. 3 Gatling Dep. pp. 182-187. When asked what was discussed, the witness was improperly instructed not to answer.

6 Q All right. So after your having a meeting
7 with your lawyer and Stephanie Trotter, your testimony
8 has now changed; is that what you're telling us?
9 A I misremembered. I can't remember exactly
10 what I said earlier, but —
11 Q You misremember after having a meeting with
12 your lawyer and Stephanie Trotter; is that what you're
13 telling us?
14 MR. COUNTRYMAN: Object to the form.
15 A (Continuing) I now remember.
16 Q Okay. And you now remember something

17 different than what you've been testifying about after
 18 meeting with your lawyer and Stephanie Trotter; right?

19 MR. COUNTRYMAN: Object to the form.

20 A (Continuing) Yes.

Ex. 3 Gatling Dep. p. 200.

This reprehensible conduct should be sanctioned and include: ordering the witnesses to continue the deposition promptly at the offices of Plaintiff's counsel at a date and time convenient to Plaintiff's counsel, having the defendant pay the costs of the deposition taken and the one to be continued, including the costs and time that will be needed by the witness to travel to Charleston, the time spent by Plaintiff's counsel to travel back and forth to Columbia for the first deposition and the costs associated with that. Further relief should include having a different defense attorney attend the deposition and award a monetary sanction for wasting so much time. Inquiry into all the discussions should also be ordered.

Further, as Stephanie Trotter, a South Carolina attorney with the defendant MTB, actively participated in the improper conduct of witness coaching, her deposition should be allowed to inquire into her improper conduct and any other matter concerning this lawsuit.

E. IMPROPER OBSTRUCTIVE BEHAVIOR BY DEFENSE COUNSEL.

1. *Instructing Deponent to Leave a Deposition that Was Not Concluded is Improper.*

Defense counsel's improper behavior included ending a deposition for no reason. The out of state deposition of a paralegal Sheri Self, a former MTB employee, was agreed to by she and her boss, a Georgia attorney. Ex. 4 Email July 18, 2018. Her boss preferred to conduct the deposition during office hours but "did

not wish to imply that we (or Mrs. Self) would seek to limit the length of any deposition.” Ex. 4 Email of D. Nelson July 18, 2018.

After Mrs. Self agreed to be deposed, MTB took about 6 months to set a date. The deposition began around 10:45 a.m. After about fifteen improper interruptions and delays of about an hour by defense counsel to discuss off-the-record previously produced documents with the witness, defense counsel announced the termination of the deposition at 3:00 p.m. No reason was given. Due to the improper objections and lunch time taken by the witness, the actual deposition time was only about 3 hours. There were many documents brought to the deposition to go through with this witness as she was an integral part of the team used to create and process the form letters. However, defense counsel would not allow the examination to occur.

MR. COUNTRYMAN: Justin, I'm sorry to interrupt, but it is 3:00, and I got to get on the road. So I'm going to have to end the deposition.

In violation of the Rules and agreement reached with Mrs. Self's attorney boss, Mr. Nelson, defense counsel told the witness "You don't have to stay here."

Ex. 2 Self Dep. p. 223, 4-12.

When an attempt was made to continue questioning the witness by Plaintiff's counsel, defense counsel interrupted and began asking his own questions.

19 MR. COUNTRYMAN: When we talked yesterday and
20 talked before, it was with the understanding that what
21 we said was privileged and confidential; correct?
22 THE WITNESS: Yes.
23 MR. KAHN: Objection.
24 Hold on a second, now. You can't -- I'm

25 still asking questions. You don't get to ask
1 questions. And if you're going to ask about it, then
2 I'm going to ask you about these conversations you had
3 since he just opened the door.

4 BY MR. KAHN:

Q So when did you meet with Mr. Countryman?

6 MR. COUNTRYMAN: This deposition is over.

20 MR. COUNTRYMAN: Sheri, you don't have to
21 stay here.

3 MR. COUNTRYMAN: You can get up, and you
4 don't have to answer that question.

Ex. 2 Self Dep. pp. 223-225.

The conduct is reprehensible. Sanctions should snuff out such conduct in the future. The sanctions should include ordering that the deposition of Sheri Self will continue at offices of Plaintiff's counsel at a date and time convenient to Plaintiff's counsel, the defendant pay the costs of the depositions taken and the ones to be continued as well as the costs and time that will be needed by the witness to travel to Charleston, reasonable attorney's fees for the time spent by Plaintiff's counsel to travel back and forth to Macon, Georgia for the first deposition and the costs associated with that. Further, relief should include having a different defense attorney attend the deposition and award attorney's fees, costs and a monetary sanction for wasting so much time. Inquiry into the off-the-record discussions should also be ordered.

2. Assertion of Privilege Despite Witness Stating Defense Counsel Was Not Her Lawyer is Improper.

During the deposition of Sheri Self, the witness testified that she had not hired defense counsel to be her attorney.

3 Q Have you signed any kind of legal retainer

4 agreement with him?

5 A No.

6 Q Have you hired him to be your lawyer?

7 A No.

Ex.2 Self Dep. pp. 23-24.

Defense counsel claimed multiple off-the-record discussions with the witness about previously produced documents were "privileged." When inquiry was made as to how, defense counsel stated that *he* was asserting privilege, *not the witness*.

10 MR. KAHN: What privilege could you all have

11 been discussing that relates to a document produced to

12 us from McCabe Trotter as part of this litigation?

13 MR. COUNTRYMAN: I'm the one asserting the

14 privilege, not the witness. And I'm happy to talk to

15 you about it, if you would like.

Ex. 2 Self Dep. p. 206.

There is no known privilege for an attorney to invoke after prohibited off-the-record conferences with a witness about previously produced documents. This conduct is neither privileged nor protected. It is forbidden.

Succinctly, during multiple depositions, MTB's counsel repeatedly engaged in off-the-record witness coaching, obstructive and disruptive behavior including instructing a witness to leave a deposition that had not concluded and otherwise failing to comply with the clearly defined deposition conduct rules.

3. *Speaking Objections to Clarify are Improper.*

A witness's attorney cannot object to a question just because the attorney does not understand the question. *See Hall*, 150 F.R.D. at 530 n. 10 adopted and approved by *In re Anonymous Member of S.C. Bar*. Furthermore, it is improper for counsel to state for the record their interpretations of questions, since such interpretations are completely irrelevant and improperly suggestive to the deponent. *Id.* A witness's attorney must also refrain from rephrasing questions for the witness. *In re Anonymous Member of S.C. Bar*, at 192, 17. Despite the clear pronouncement, defense counsel did not hesitate to engage in improper behavior.

6 Q -- the law firm did not generate another
7 invoice for the homeowner's association for any
8 additional legal fees related to this work; right?
9 MR. COUNTRYMAN: Object to the form.
10 A (Continuing) I mean --
11 MR. COUNTRYMAN: You're talking about this
12 specific one or --
13 MR. KAHN: Andy, please stop.
14 MR. COUNTRYMAN: I just had a question about
15 clarification so the witness could answer.
16 MR. KAHN: That's completely improper.
17 MR. COUNTRYMAN: Sounds good.

Ex. 2 Self Dep. p. 178.

Defense counsel repeatedly improperly interposed.

3 MR. KAHN: I've asked her a question, and you
4 are interrupting and stating things improperly, which
5 are in clear violations of the rules.
6 MR. COUNTRYMAN: Sounds good.
7 MR. KAHN: If you have an objection, then
8 state it, and I'll go from there.
9 MR. COUNTRYMAN: I object to the question you
10 asked her because it mischaracterized what she said,
11 and you slid words in there that she didn't say. I
12 think that's misleading, unfair, and deceptive.
13 MR. KAHN: Your extraneous comments are
14 specifically prohibited by the South Carolina Supreme
15 Court and under the rules.
16 MR. COUNTRYMAN: Then call somebody. Take
17 somebody up. That's fine.
18 MR. KAHN: I would ask you to refrain from
19 engaging in that conduct. I'm just asking as nice as I
20 can be and as civil as I can.

Ex. 2 Self Dep. p. 143.

In the deposition of Sheri Self, MTB counsel instructed the witness about 24 times not to answer questions related to documents previously produced. Ex. 2 Self Dep. p. 21, 11, p. 22, 23, p. 23, 3-4, p. 24, 9-10, p. 94, 9-11, p. 95, 14-15, p. 104, 17-

18, p. 113, 17-18, 21-22, p. 114, 3-4, p. 118, 2-4, 20-21, p. 123, 15-16, p. 148, 6-7, 15-16, p. 150, 20-22, 25, p. 151, 9-10, p. 156, 16-17, p. 161, 2-3, 12-13, p. 172, 21-22, p. 183, 11-12, 20-21, p. 185, 18-19, p. 186, 10-11, 21-23, p. 194, p. 195, 5-7, p. 204, 21-23, p. 205, 13-14, 22-23, p. 206, 8-9.

During the deposition, MTB counsel repeatedly met with the witness about 15 times to discuss previously produced documents and engage in witness coaching.

The above is but a sampling of the improper conduct contained within the depositions referenced and attached.

F. RELIEF REQUESTED AND SANCTIONS WARRANTED.

As to discovery abuse, the Washington State Supreme Court aptly noted:

Misconduct, once tolerated, will breed more misconduct...

Washington State Physicians Ins. Exch. & Ass'n v. Fisons Corp., 122 Wash. 2d 299, 355, 858 P.2d 1054, 1084 (1993). Actions taken in a deposition designed to prevent justice, delay the process, or drive up costs are improper and warrant sanctions. *In re Anonymous Member of S.C. Bar*, at 194, 18.

Depositions are widely recognized as one of the “most powerful and productive” devices used in discovery. *See* A. Darby Dickerson, *The Law and Ethics of Civil Depositions*, 57 Md. L. Rev. 273, 277 (1998). Since depositions are so important in litigation, attorneys face great temptation to cross the limits of acceptable behavior in order to win the case at the expense of their ethical responsibilities to the court and their fellow attorneys. Claiming that any such improper behavior was merely “zealous advocacy” will not justify discovery abuse. When attorneys cross the line during a deposition, their actions do not promote the

“just, speedy, and inexpensive determination of every action.” *See* Rule 1, SCRPC. *In re Anonymous Member of S.C. Bar*, 346 S.C. 177, 193, 552 S.E.2d 10, 18 (2001).

This Court should prevent the spread of this misconduct with a clear order.

IV. CONCLUSION

The facts show that the opposing party and its counsel acted intentionally and in bad faith. The prejudice to the Plaintiff includes conduct designed to witness coach, change testimony and block the search for the truth via proper inquiry. There is a clear need to deter this conduct in the future. The Court should, at a minimum, order and award relief and sanctions including the following:

1. The depositions of Haylen Gatling, Sheri Self and Stephanie Trotter reconvene at Plaintiff's counsel's office promptly at dates and times of Plaintiff's counsel's choosing and MTB be required to pay the witnesses for their time, costs and travel;
2. MTB promptly pay the reasonable attorney's fees for Plaintiff's counsel time to travel and attend the prior depositions and associated costs, to include the deposition costs already incurred and to be incurred;
3. Monetary sanctions for the reprehensible conduct of defense counsel in an amount sufficient to deter such future behavior;
4. The costs and reasonable attorney's fees for having to prepare and file this motion;
5. MTB counsel should be sanctioned for engaging in the improper conduct and prohibited from engaging in such improper conduct in the future;

6. Striking of MTB's answer and that MTB engaged in conduct in violation of the FDCPA and UTPA resulting in damage to the Plaintiff and the class in the amount of the attorney's fees claimed owed by MTB is deemed as fact; and

7. Such further and relief as is just, equitable and proper.

Counsel certifies that consultation would serve no useful purpose.

KAHN LAW FIRM, LLP

/s/ JUSTIN S. KAHN [SC BAR No. 65100]

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ATTORNEYS FOR PLAINTIFF

February 7, 2019

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

COURT OF COMMON PLEAS

Case No. 16-CP-18-1001

Tammy C. Richardson,

Plaintiff,

v.

McCabe, Trotter & Beverly, P.C., and
Halcyon Real Estate Services, LLC,

Defendants.

Motion to Reconsider Order Entered April 4,
2019, and to Stay Relief Granted in Order
(Expedited Hearing Requested)

TO JUSTIN KAHN, ESQ. AND MARY LEIGH ARNOLD, ESQ., ATTORNEYS FOR THE
PLAINTIFFS:

YOU WILL PLEASE TAKE NOTICE that at such time and place as set by the court Defendant McCabe, Trotter & Beverly, P.C. ("MTB") will move the court to reconsider its order entered April 4, 2019, and it will move the court to stay the relief granted in the order until such time as the matters raised in this motion have been finally determined. MTB requests an expedited hearing on the request for a stay.

The specific grounds are:

1) MTB did not in fact violate the South Carolina Rules of Civil Procedure during the depositions in question, and it properly relied on Rule 30(j)(8) to engage in private conferences with witnesses during their depositions.

2) The court failed to recognize MTB's argument that Rule 30(j)(8) provides an exception to Rule 30(j)(5), limiting the circumstances during which counsel can have off-the-record conversations with a witness.

Q

3) Even if the court were to decide MTB violated Rule 30, MTB's position was reasonable and not at all willful or in bad faith.

4) Language in the order purporting to require Sheri Self to do anything should be stricken because the court does not have jurisdiction over her; and to the extent the order requires MTB to take actions it has no power to take, it should be vacated.

5) The court's conclusion that MTB's counsel interfered with the deposition by instructing the witness to leave at 3PM ignores the fact that deposing counsel himself caused a significant delay in the start of the deposition because he did not provide a Georgia notary to take the deposition. It also ignores the fact that Ms. Self stated during the deposition that she had work to complete that afternoon; it ignores the fact that Plaintiffs' counsel would not give an estimate as to how much longer the deposition would take; it ignores the fact that counsel for MTB stated during the deposition that he was needed at home to help with his newborn child (two months old at the time); and it ignores the fact that Plaintiff's counsel wasted 30 – 45 minutes by declining MTB's counsel's offer to review documents over lunch.

6) The court's conclusion that MTB's counsel engaged in witness coaching is unsupported by the evidence and ignores the fact that when Plaintiff's counsel violated Rule 30(j)(8) by not identifying documents before the deposition, MTB's counsel had the right to confer with the witness about the document and such conferences can result in the witness's recollection being refreshed without any coaching.

7) The order fails to define the scope of the reconvened depositions.

8) Since counsel for MTB had the absolute right to engage in private discussions with witnesses where documents had not been properly identified before the deposition, and since the court's sanctions order improperly prohibits counsel from benefiting from the protections of Rule 30(j)(8), the court should stay all relief granted in its order until it has reconsidered its order.

MTB requests an expedited hearing on the motion for a stay since Plaintiffs' counsel has noticed the depositions of Haylen Gatling and Stephanie Trotter, Esq. for April 23, 2019, and MTB will be prejudiced because this court's order allows Plaintiffs' counsel to inquire about attorney-client protected communications and this court's order could be read to allow Plaintiffs' counsel to introduce additional documents without the protection of Rule 30(j)(8), as this court's order has enjoined MTB's counsel from raising objections pursuant to the rule.

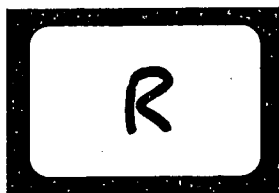
This motion is based on the memorandum of law filed herewith, the pleadings, the laws of the State of South Carolina, the letters, emails, and memoranda previously submitted to this court, and upon such other and further matters as may be properly presented to the court.

April 15, 2019

s/ Robert P. Wood
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From: Murphy, Maite Law Clerk (Chandler D. Rowh) [<mailto:mmurphylc@sccourts.org>]
Sent: Monday, April 22, 2019 11:15 AM
To: Robert P. Wood <Robert.Wood@rtt-law.com>

Cc: Ryan McCabe <Ryan.McCabe@mccabetrotter.com>; Andy Countryman <awc@countrymanlawfirm.com>; Dawes Cooke (mdc@Barnwell-Whaley.com) <mdc@Barnwell-Whaley.com>; sammie@maryarnoldlaw.com; Justin S. Kahn (jskahn@kahnlawfirm.com) <jskahn@kahnlawfirm.com>; Sarah B. Prince <Sarah.Prince@rtt-law.com>; Lauren C. Hubbard <Lauren.Hubbard@rtt-law.com>; Joshua R. Hinson <Joshua.Hinson@rtt-law.com>
Subject: RE: Richardson v. McCabe Trotter & Beverly case no: 2016-cp-18-1001

****External Email****

Good Morning,

I hope everyone had a wonderful weekend. While MTB disagrees, all arguments raised in the motion to reconsider were sufficiently ruled upon in the original order, and for this reason, the stay as well as the relief sought therein will be denied without the need for an additional hearing. An order will be filed shortly, but I just wanted to inform everyone beforehand, so they can proceed accordingly.

Best,

Chandler

From: Robert P. Wood <Robert.Wood@rtt-law.com>

Sent: Friday, April 19, 2019 2:02 PM

To: Murphy, Maite Secretary (Robin Dukes) <mmurphysc@sccourts.org>; Murphy, Maite Law Clerk (Chandler D. Rowh) <mmurphylc@sccourts.org>

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Subject: Richardson v. McCabe Trotter & Beverly case no: 2016-cp-18-1001

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Judge Murphy,

I represent McCabe Trotter & Beverly, PC (MTB) in the lawsuit brought against them by Tammy Richardson. On April 4, 2019, the Court issued an order sanctioning MTB for violations of certain discovery rules, including Rule 30(j)(5)'s prohibition against off-the-record conferences with deposition witnesses. On April 15, 2019, MTB filed a motion asking this Court to reconsider its order and stay the relief granted until such time as the Court rules on the motion to reconsider.

Plaintiffs have noticed two of the depositions provided for in the order for April 23, 2019. In order to prevent the motion to reconsider from becoming moot, MTB again requests the Court grant its motion to stay the relief granted at its earliest convenience.

Sincerely,

Bob

20-JUL S.C. Law. 10

South Carolina Lawyer
July, 2008

Column

Beyond the Bar
Warren Moïse

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TURNIPS AND TRIAL ETHICS

Lawyers are like turnips. We all get our chance to look silly in court. Me? I've been a poster boy for the turnip industry. Young lawyers, like turnip seeds, especially need time to grow roots and push through the dirt to the sunlight. Everyone, legal secretaries included, has more *practical* knowledge than they do. Each day they're pitted against experienced attorneys. As for litigation, they've seen more litigation on television than in courtrooms. In short, new attorneys sometimes don't know "how things are done." Searching for an identity, and wanting to make a name for themselves, they're impressionable. Sometimes they get the wrong impression.

Here are some trial-related practices I once thought were slick and professional like the TV lawyers. Now, I just think they're sleazy. Some lawyers might disagree with me, but here goes.

Who cares? The jury heard it.

Ever tried a case against a lawyer who asks a question, or makes a statement in opening or closing, knowing that it's patently improper? For example, have you heard an adversary question the investigating officer in a wreck case with "Isn't it true, Officer Smith, that you gave the ticket to the defendant for running the red light, not my client?" Then, after an objection, the lawyer says, "Sorry judge" or "Withdrawn, your honor." Or, without first bringing the matter up with the judge, trying to slip into evidence a criminal conviction that's likely inadmissible?

The rules say a "lawyer shall not allude to any matter that the lawyer does not reasonably believe is relevant or that will not be supported by admissible evidence." SCACR 407, § 3.4(e). If you reasonably believe the testimony you seek to elicit is inadmissible, *don't ask the question*. In fact, the Supreme Court of South Carolina reversed in one case because the plaintiff's lawyer repeatedly cross-examined (without getting an answer) the defendant about his liability insurance in a personal injury case.

As I see it, your adversary might offer two types of evidence against you: (a) garden variety prejudicial evidence and (b) highly prejudicial evidence that could cause a mistrial if improperly admitted. An example of the latter is: "Isn't it true that 11 years ago you were convicted of having sex with your daughter?" or "Didn't *your own adjuster* admit that *you were at fault* and offer to *pay me \$500,000* to settle?" You know your case better than anyone else and will recognize the highly prejudicial stuff. I suggest that you take these matters up with the judge before you pop them out at trial.

The same probably goes for opening statements. When you reasonably believe you'll have an uphill battle getting a fact or line of questioning into evidence, be cautious about mentioning it in the opening. The ball bounces both ways. A motion in limine is your best defense against having an adversary sink your case by a cheap shot in the opening or during the rest of trial.

Misleading the judge, jury or your adversary

Sometimes in the heat of battle, a lawyer says something he wishes or suspects is true but later learns that it's incorrect. There are gray areas in every trial. However, the rules give us guidance.

If you told the judge or other lawyer something important ("material") that you later learn is incorrect, or when you've offered material evidence that later turns out to be false, you must take reasonable remedial measures to correct the misconception. This includes, when necessary, disclosing the matter to the judge. SCACR 407, § 3.3(a)(3).

Conflicts with your client

How about when you learn that your client wants you to offer false evidence or is about to testify falsely? You may refuse to offer the evidence (except the accused's testimony in a criminal trial). *Id.*

Evidence Rule 614 (allowing the court to call a witness) is available to help in situations where a witness may have important testimony but has changed positions. (Note: the common law in the Fourth Circuit and South Carolina regarding courts' witnesses is similar but not identical.)

Problems sometimes arise in the context of insurance-defense litigation. Assume that a defense attorney has a hunch that his client/defendant (being sued by the defendant's wife) wants to give exaggerated or false testimony to help the wife's case. Also assume that the insurance adjuster asks the defense lawyer to impeach the client's false testimony. What to do—put up the client's testimony which the attorney merely suspects is exaggerated or false, or impeach the client as the adjuster requests? Tough choice. In an extreme case, the defense attorney might have to withdraw under SCACP 407, § 1.7. However, he probably cannot impeach his own client's credibility to benefit the insurer. *Cf. R. Davis Howser, Blessed Be! The Tie That Binds: Conflicts of Interest Revisited, The Defense Line* 11-14 (Winter 1997).

Misstating the controlling law

Lawyers aren't required to vouch for or have personal knowledge *11 of facts in pleadings or evidence submitted at trial. Nor is an attorney required to present the law impartially to a judge. However, a trial attorney must disclose directly adverse controlling law when the other lawyer fails to do so. SCACR 407, § 3.3(2). The same goes for misleading statements of facts or evidence she knows are false. *Id.* at comment [2].

Witness behavior during breaks in trial or depositions

This rule starts out simple. You're not supposed to talk to your witness about his testimony during a break in trial or a deposition. Thus, if the judge gives the jurors a smoke break, you cannot speak to your witness about problems in his testimony or about things you intend to "clarify" on re-direct. (During a lunch break, there's no prohibition against having lunch with your client, though some lawyers decline to do so because of the appearance of impropriety.) The same goes for deposition testimony, except to decide issues of privilege or to make a motion for a protective order, or regarding documents not provided (or identified) at least three days before the deposition (two days in the state courts). Local Civil Rule 30.04(H); S.C. R. Civ. P. 30(j)(8). (The rules don't specifically say whether providing and identifying documents in response to interrogatories and requests to produce satisfy this requirement.) Probably the best course is for a lawyer also to advise his client not to consult documents (e.g., a deposition transcript or statement) or talk to the client's friends present in the courtroom during breaks in trial testimony or a deposition.

OK, that's the easy part. Now for criminal prosecutions. The accused also may be barred from consulting with his lawyer on a break between direct and cross. *Perry v. Leake*, 832 F.2d 837 (4th Cir. 1987). However, the accused's constitutional rights might be violated if prohibited from consulting with the attorney overnight. Nonetheless, a defense attorney is still not allowed to coach a client on a break about the client's testimony, even if the completion of the testimony is delayed overnight.

A friendly conversation with the jurors

Everyone knows that you're not supposed to contact jurors *during* trial. But how about *before or after* trial?

Before trial, direct contact by lawyers or litigants with jurors who will be in the venire is barred. Even indirect contact, such as hiring an investigator to interview jurors, is the stuff of which disbarments are made.

The problems usually arise with members of the jurors' families. See *United States v. Warlick*, 742 F.2d 113 (4th Cir. 1983); S.C. Bar Ethics Advisory Opinion 93-27. In the state courts, members of the juror's family may not be contacted if within the "sixth degree" of kinship. In federal district court, the bar extends to "members of the family" as described in Local Civil Rule 47.03.

How about after trial? Generally, contact between trial lawyers and jurors is allowed, unless barred by the judge or applicable rules. Many years ago, some of the older judges frowned upon any post-trial juror contact. In federal courts, lawyers "do so at their own peril," at least in civil trials. Local Civil Rule at 47.05(B). Since I have been practicing law, I've had no judge prohibit lawyers from contacting jurors. To educate lawyers, one former circuit judge encouraged respectful, proper juror contact. There is an ethics opinion, however, indicating that lawyers should not write a letter to all jurors thanking them for their service. S.C. Bar Ethics Advisory Op. 77-04.

If there is no prohibition by the court, and you want to speak to a juror after trial, I'd suggest that at the outset you inform the juror who you are, that she need not speak to you at all if she desires not to, that post-trial contact with consenting jurors is not prohibited by law, and then ask her if she'd mind speaking to you for a few minutes. Be *extremely* solicitous of the juror's feelings and end the call immediately (but politely) if you believe the juror is unappreciative of your contact. Your comments shouldn't have the effect of harassing the juror or trying to influence her actions in future jury service. Local Civil Rule 47.05(B).

And finally ...

Here are three final suggestions I believe might help in making a gray-area type decision about what's right or wrong. Use 'em as you see fit.

- If you told the other lawyer you'd do something, abide by your word, *even if it's not in writing*.

- Being rude, haughty or arrogant doesn't mean you're a good litigator. It doesn't mean you're a "legend." It just means you're a jerk. The best lawyers I've known are polite and respectful. Remember the Lawyer's Oath.

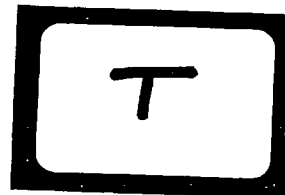
- Give the other a lawyer a break on procedure when he or she needs it. I don't mean that you should let a slack attorney shift the burden to you. Just remember that no one's perfect, and what goes around comes around.

20-JUL SCLAW 10

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION



Cheryl Hammond Hoskins, individually)	C/A No. 3:08-2442-JFA
and as personal representative of the)	
Estate of Thomas R. Hoskins,)	
)	
Plaintiff,)	ORDER
)	
vs.)	
)	
Sharon Snipes-King, Wheels, Inc., and)	
Siemens Medical Solutions USA, Inc.,)	
)	
Defendants.)	
)	

This is before the court on a discovery dispute. The plaintiff in the case is the wife of a deceased bicyclist, and defendant Sharon King was driving the automobile that struck and killed the bicyclist. King's deposition is scheduled for tomorrow, and a disagreement has arisen between the parties in advance of the deposition. King's lawyer contends that the plaintiff has failed to provide sufficient identification of the documents to be shown to King at her deposition. Plaintiff disagrees and filed a motion raising the topic to the court's attention. [dkt. # 102].

Under the Local Rules of this court, a deposing attorney is required to provide opposing counsel with a copy of all documents to be shown to the deponent during the deposition. See D.S.C. Local Rule 30.04(H). The rules provide that if these documents are identified at least three business days before the deposition, the deponent and his or her

counsel do not have the right to discuss these documents privately during the deposition. Plaintiff has identified roughly 3,220 documents to be shown to King during her deposition. These documents constitute the bulk of the documents produced during discovery in this case. King's counsel has taken the position that this identification is insufficient and that if necessary, he intends to privately discuss any previously unidentified documents with King, during the deposition, for a reasonable amount of time.

While it appears that the plaintiff is in technical compliance with the local rule by identifying the over 3,000 documents prior to King's deposition, the court finds such a voluminous identification does not fulfill the spirit of the local rule. The discovery rules contemplate a deponent having a reasonable opportunity to review relevant documents that will be shown to him, with counsel, prior to a deposition; and under the circumstances of this case, preparing within the limits of Fed. R. Civ. P. 30 to be questioned on over 3,000 documents is unworkable. It is not possible, in the court's view, for King's counsel to review 3,000 documents with her in the week's time which elapsed between plaintiff's identification of documents and King's deposition. Time would not allow even a cursory review of each document to determine the application of a privilege or any other of the grounds which justify a witness's failure to answer a deposition question. Regrettably, this problem has left the parties' hands and ended up in court. The court's ability to craft a nuanced solution to such a problem is not substantial.

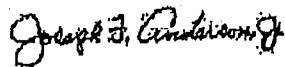
The court finds that in light of the voluminous number of documents identified for the

deposition, it is reasonable for King and her counsel to be afforded a reasonable amount of time to review any document as necessary to determine whether the document or whether King's answers to questions on the document would be protected by a privilege. The court expects that this process should go relatively smoothly. Counsel should communicate as each document is presented during the deposition, and any off-the-record conference King may need to have with her attorney may be accommodated in a number of ways. It may be that the parties can break the deposition into a number of sections and that before each section, King and her counsel can briefly confer as to the documents to be used therein. It may also be that King and her counsel will have reviewed many of the identified documents prior to the deposition and that this limited ability to confer privately will not be necessary across the board. The parties' ability to work through these problems creatively far exceeds this court's capacity to craft detailed solutions. The court expects the principles set forth in this order to guide the parties smoothly through tomorrow's deposition and, for that matter, through the remainder of discovery. The court urges the parties and their counsel to honorably and reasonably discharge their discovery obligations and to not abuse the process in an effort to gain any tactical advantage.

The plaintiff's motion is therefore granted insofar as the motion asserted that plaintiff has technically complied with the identification requirement of Local Rule 30.04(H), but denied insofar as it sought an order preventing King's counsel from having off-the-record conferences to discuss the over 3,000 documents identified for use in King's deposition.

IT IS SO ORDERED.

July 6, 2009
Columbia, South Carolina

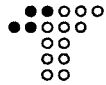


Joseph F. Anderson, Jr.
United States District Judge

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ATTORNEYS AT LAW

May 23, 2019

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

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MAY 23 2019
SC Court of Appeals

RE: *Tammy Richardson v. Halcyon Real Estate*
Appellate Case No. 2019-000671

Ms. Kitchings:

As requested, please find enclosed a memorandum addressing the issue of the immediate appealability of Judge Murphy's order, along with the attached exhibits.

Please don't hesitate to contact me if you have any questions or concerns.

Sincerely,

Joshua R. Hinson

Cc:

Justin Kahn, Esq.
Mary Leigh Arnold, Esq.
M. Dawes Cook, Esq.
Justin Novak, Esq.