

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

May 26 2020

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Frank Addy, Circuit Court Judge

Appellate Case No. 2019-000637

Tony Young,..... Appellant,

v.

Greenwood County Detention Center and the Greenwood County Sheriff's
Office, Defendants,

Of Which The Greenwood County Sheriff's Office is,..... Respondent.

RECORD ON APPEAL - VOLUME III

Russell W. Harter, Jr., S.C. Bar # 2778
Carly H. Davis, S.C. Bar #100112
Chapman, Harter & Harter, P.A.
PO Box 10224
Greenville, South Carolina 29603
(864) 233-4500 (telephone)

Attorneys for Respondent

Joshua T. Hawkins, S.C. Bar #78470
Helena L. Jedziniak, S.C. Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
(864) 275-8142 (telephone)
(864) 752-0911 (facsimile)
josh@hjllcsc.com
helena@hjllcsc.com

Kyle J. White, S.C. Bar # 101426
White, Davis and White Law Firm
209 E. Calhoun St.
Anderson, South Carolina 29621
(864) 231-8090 (telephone)
(864) 231-8006 (facsimile)
kyle@wdwlawfirm.com

Attorneys for the Appellant

INDEX

Orders and Judgments

U.S. District Court Order filed January 5, 2016	1
Order Denying Motion for a New Trial dated March 27, 2019	2

Pleadings

Summons and Complaint dated July 10, 2013 Designated as Civil Action No. 2013-CP-24-00655	3
Answer filed August 12, 2013	13
Summons and Complaint Designated as Civil Action No. 2016-CP-24-00157	23

Motions

Plaintiff's Motion in <i>Limine</i> filed September 19, 2018	42
Defendants' Motion in <i>Limine</i> dated September 19, 2018	49
Plaintiff's Supplemental Motion in <i>Limine</i> filed September 21, 2018	51
Plaintiff's Motions for a New Trial, Thirteenth Juror Doctrine, and JNOV filed October 5, 2018	54

Transcripts and Exhibits

Trail Transcript dated September 24, 2018 - September 27, 2018	56
Rodney Gresham Direct by Mr. White	150
Rodney Gresham Cross by Mr. Harter	156
Rodney Gresham Redirect by Mr. White	161
Rodney Gresham Recross by Mr. Harter	162
Gene Powell Direct by Mr. White	164
Gene Powell Cross by Mr. Harter	188

Gene Powell Redirect by Mr. White.....	202
Gene Powell Recross by Mr. Harter	210
Katie Gilmore Direct by Mr. White.....	215
Katie Gilmore Cross by Mr. Harter	232
Katie Gilmore Redirect by Mr. White	244
Katie Gilmore Recross by Mr. Harter.....	250
Jeffrey Daniel Roberts Direct by Mr. White.....	252
Sherry Bouknight Direct by Mr. White	255
Sherry Bouknight Cross by Mr. Harter.....	277
Sherry Bouknight Redirect by Mr. White.....	330
Sherry Bouknight Recross by Mr. Harter	337
Beverly Weaver Direct by Mr. White.....	339
Beverly Weaver Cross by Mr. Harter	357
Beverly Weaver Redirect by Mr. White	364
Beverly Weaver Recross by Mr. Harter.....	365
Lonnie Smith Direct by Mr. Hawkins.....	366
Lonnie Smith (In Camera) Direct by Mr. Hawkins	399
Lonnie Smith Direct by Mr. Hawkins cont.....	409
Lonnie Smith Cross by Mr. Harter	412
Sharon Middleton Direct by Mr. Hawkins	419
Sharon Middleton Cross by Mr. Harter.	452
Sharon Middleton Redirect by Mr. Hawkins.....	463
Sharon Middleton Recross by Mr. Harter.....	464

Matters of Law	466
Samantha Porter Direct by Mr. Hawkins.....	484
Samantha Porter Cross by Mr. Harter.....	493
Samantha Porter Redirect by Mr. Hawkins	505
Samantha Porter Recross by Mr. Harter	507
Deposition Testimony of Debra Lynn Knowles	512
Tony Young Direct by Mr. Hawkins	524
Tony Young Cross by Mr. Harter	560
Michael Holtzclaw Direct by Mr. White	595
Michael Holtzclaw Cross by Mr. Harter.....	598
Plaintiff Rests.....	599
Lonnie Smith Direct by Mr. Harter.....	600
Lonnie Smith Cross by Mr. White.....	603
Defendant Rests	604
Motion - Directed Verdict.....	606
Jury Charge Conference.....	607
Closing Argument by Mr. Hawkins.....	630
Closing Argument by Mr. Harter.....	648
Rebuttal Closing Argument by Mr. Hawkins	674
Charge on the Law.....	686
Verdict.....	702
<u>Plaintiff's Exhibits</u>	
Exhibit 1 - Minimum Standards.....	707

Exhibit 2 - Classification Policy	814
Exhibit 3 - Code of Ethics.....	823
Exhibit 4 - General Population	829
Exhibit 5 - Health Care	848
Exhibit 6 - Information System and Research	882
Exhibit 7 - Inmate Handbook.....	889
Exhibit 8 - Inmate Rights.....	896
Exhibit 9 - Post Orders.....	904
Exhibit 10 - Management Policy	906
Exhibit 11 - Mission Statement.....	909
Exhibit 12 - Training and Staff Development.....	910
Exhibit 13 - Transportation of Inmates Outside of Facility	913
Exhibit 14 - Skeleton Diagram	DEMONSTRATIVE TO LARGE TO PROVIDE
Exhibit 15 - Greenville Hospital Medical Record	924
Exhibit 16 - Patient Discharge Information	926
Exhibit 17 - Patient Discharge Instructions	930
Exhibit 18 - Intake Medication Form.....	931
Exhibit 19 - Temporary Custody Form.....	932
Exhibit 20 - Sick Calls Inmate	933
Exhibit 21 - Progress Notes	943
<u>Defendants' Exhibits</u>	
Exhibit 1 - Medical Staff Screening Form.....	948
Exhibit 2 - GHS Progress Notes	949

Exhibit 3 - Doctors Orders	957
Exhibit 4 - Patient Discharge Instructions	958
Exhibit 5 - Patient Discharge Information	959
Exhibit 6 - GHS Appointment	962
Exhibit 7 - Medical Screening Form.....	963
Exhibit 8 - Special Needs Inmate Report.....	964
Exhibit 9 - Admission Data Form	965
Exhibit 10 - Progress Notes	967
Exhibit 11 - SHP Doctor Orders	976
Exhibit 12 - Medication Administration Records	980
Exhibit 13 - 1/26/12 E-mail	999
Exhibit 14 - 12/8/11 Email.....	1000
Exhibit 15 - Incident #12-0408	1001
Exhibit 16 - SHP Patient Complaints.....	1002

Court's Exhibit

Exhibit 1 - Deposition Transcript of Deborah Knowles	1010
--	------

Other Documents

<i>Voire Dire</i> dated September 21, 2018.....	1025
Plaintiff's Requests to Charge	1026
Purposed Verdict Form	1043
Certificate of Counsel	1044

MEDICATION ADMINISTRATION RECORD

MEDICATION	MON	TUE	WED	THU	FRI	SAT	SUN	MON	TUE	WED	THU	FRI	SAT	SUN	MON	TUE	WED	THU	FRI	SAT	SUN
naproxen 500mg	A	8-18-11	→	8-28-11																	
PO BID x 10 days	P																				
Bu 200mg x 3	A	8-16-11	→	8-18-11																	
abs PO BID	P																				
metoprolol 10mg	A																				
tab PO BID	P																				
naproxen 500mg	A	8-24-11																			
PO BID	P																				

STARTING FOR 8-16-11 THROUGH 8-3-11
 Physician K. Massey Telephone No. _____ Medical Record No. _____
 Address NKOF Alt. Telephone _____
 Renal/Bladder/Potential _____

Medication Number _____ Medicare Number _____
 Completed Times Checked By SPENCER H Title MTA Date 8-17-11
 Patient Tony Young M. H Date 8-16-11

GCDC Young Medical 000123

GCDC Young Medical 000124

GREENWOOD CO. (SC) DET CTR
YOUNG, TONY
REPORT DATE : 09/11

MEDICATION ADMINISTRATION RECORD

*Continue Loratadine & extra

DATE	TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/24/12	AM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/24/12	PM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/26/12	AM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/26/12	PM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/27/12	AM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/27/12	PM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/28/12	AM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/28/12	PM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/29/12	AM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/29/12	PM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/30/12	AM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
09/30/12	PM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31

ibuprofen 200mg x3
PO BID x 10d

Loratadine 10mg
1 tab PO q am

Gabapentin 100mg
po qhs

ibuprofen 200mg
3 tabs po BID

CHARTING FOR:	09/01/11	THROUGH	09/30/11	PAGE	1 OF	1
Physician:	MASSEY, TAMI	Telephone No:		Medical Record No:		
Ab. Physician:		Alt. Telephone:				
Notes:	NO KNOWN ALLERGIES	Ref: [Signature]				
GCSO Young 000057						
Medical Number:	Medicare Number:	Complete:	Primes Checked:	Title:	MCA	Date:
RESIDENT	YOUNG, TONY	DOB:	[Redacted]	Room:	J	Admission Date:
				Code:	YOUNGT	08/17/11

GREENWOOD CO (SC) DET CTR
UNG, TONY
PORT DATE : 10/11

MEDICATION ADMINISTRATION RECORD

MEDICATIONS	08/25/12	08/26/12	08/27/12	08/28/12	08/29/12	08/30/12	08/31/12
~~CURAD. GRAZEK PADS 5" X 4"~~ USE AS DIRECTED	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31
~~HIBICLEN 4% LIQUID~~ USE AS DIRECTED	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31
~~TELEX 2" X 3" NON/ADH~~ USE AS DIRECTED	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31
LORATADINE 10 MG TABLET CLARITIN 10 MG TABLET TAKE 1 TABLET TWICE DAILY 2 am	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	
~~GABAPENTIN 100 MG CAPSULE~~ TAKE 1 CAPSULE AT BEDTIME	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	
ibu 200mg 3 tabs po qd	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	AM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 PM 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	

CHARTING FOR	10/01/11	THROUGH	10/31/11	PAGE	1 OF 1
Physician	MASSEY, TAMI	Telephone No.			
Alt. Physician		Alt. Telephone			
Allergies	NO KNOWN ALLERGIES		Rehabilitative Potential		
GCSO Young 000058					
Medication Number	Medication Number	Complete Entry Checked By:	Title:	MTA 03-11	
RESIDENT	YOUNG, TONY	DOB	Sex	Room	J
			Patient	YOUNGT	Admission Date 08/17/11

985

GREENWOOD CO (SC) DET CTR
 YOUNG, TONY
 REPORT DATE : 11/11

MEDICATION ADMINISTRATION RECORD

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
CURAM: GADDER PADS 3"																															
USE AS DIRECTED																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
HIBICLENS 4% LIQUID																															
USE AS DIRECTED																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
TELFA 2" X 3" NON-ADH																															
USE AS DIRECTED																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
LORATADINE 10 MG TABLET																															
CHARITIN 10 MG TABLET																															
TAKE 1 TABLET TWICE-DAILY																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
MILNACIPRAN 500 MG TABLET																															
TAKE 1 TABLET TWICE-DAILY																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
GABAPENTIN 100 MG CAPSULE																															
NEURONTIN 100 MG CAPSULE																															
TAKE 1 CAPSULE AT BEDTIME																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
Ibuprofen 200mg 3tab																															
PO BID																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
Amoxil 500mg 1tab																															
PO qam 2 tab PO qhs																															
x10 days																															
08/26/12																															
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	

CHARTING FOR: 11/01/11	THROUGH 11/30/11	PAGE 1 OF 1
Physician: MASSEY, TAMI	Telephone No.	Medical Record No.
MR: Physician	Alt: Telephone	
Notes: NO KNOWN ALLERGIES	Ref: Alternative	Potential
GCSO Young 000061		
Medicaid Number:	Medicare Number	Complete Exam Checked By: Sherry R. B... Title: MTA Date: 11-11-11
RESIDENT YOUNG, TONY	DOB: [REDACTED] Sex: [REDACTED] Race: [REDACTED] Patient: YOUNGT	Admission Date: 08/17/11

~~GREENWOOD CO (SC) DET CTR~~
~~YOUNG, TONY~~
~~REPORT DATE : 12/11~~

987

[illegible]

MEDICATION ADMINISTRATION RECORD

[illegible]

GREENWOOD CO (SC) DET CTR
UNG, TONY
REPORT DATE : 01/12

990

991

MEDICATION ADMINISTRATION RECORD

GREENWOOD CO (SC) DET CTR
YOUNG, TONY
REPORT DATE : 02/12

MEDICATIONS	HDUP	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
GABAPENTIN 300 MG CAPSULE TAKE 2 CAPSULES IN THE MORNING	02/12/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
LORATADINE 10 MG TABLET CLARITIN 10 MG TABLET TAKE 1 TABLET IN THE MORNING	02/12/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
PHENORBEN 600 MG TABLET TAKE 1 TABLET TWICE DAILY	02/12/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
GABAPENTIN 300 MG CAPSULE TAKE 2 CAPSULES AT BEDTIME	02/12/12	1600	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Gabapentin 300mg 1 po 9 AM x 7d	02/12/12		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Gabapentin 300mg 1 po 9 PM x 7d	02/12/12		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Gabapentin 300mg 1 po qHS	02/12/12		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Gabapentin 300mg x 2 po qHS	02/12/12		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31

STARTING FOR: 02/01/12	THROUGH: 02/29/12	PAGE: 1 OF 1
NAME: MURPHY, TONY	Telephone No:	Medical Record No:
Physician:	Alt. Telephone:	
ALLERGIES: NO KNOWN ALLERGIES	Rehabilitative Potential:	
GCSO Young 000049		
Medication Number:	Medication Number:	Completed By: Sherry R. Boufford
ESIDENT: YOUNG, TONY	DOB: [REDACTED]	Patent Code: YOUNGT
	M: [REDACTED]	Date: 08/17/11

[illegible]994

48 heads

GREENWOOD CV (SC) DB1 CLR

PORT DATE : 03/12

[illegible]

MEDICATION ADMINISTRATION RECORD

GREENWOOD CO (SC) DET CTR
YOUNG, TONY
PORT DATE : 04/12

MEDICATIONS		DOSE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
LORENTADINE 10 MG TABLET TAKE 1 TABLET IN THE MORNING	01/25/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
GABAPENTIN 300 MG CAPSULE TAKE 1 CAPSULE IN THE MORNING	01/17/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
LORENTADINE 10 MG TABLET TAKE 1 TABLET IN THE MORNING	11/29/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
PREDNISONE 10 MG TABLET TAKE 6 TABLETS DAILY X3 DAYS, 4 TABLETS DAILY X3 DAYS, 2 TABLETS DAILY X3 DAYS, THEN 1 TABLET DAILY	03/03/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
IBUPROFEN 600 MG TABLET TAKE 1 TABLET TWICE DAILY	11/29/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
INDOMETHACIN 50 MG CAPSULE TAKE 1 CAPSULE TWICE DAILY	02/07/12	0800	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
GABAPENTIN 300 MG CAPSULE TAKE 2 CAPSULES BID	01/17/12	2000	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Hydrol 325mg 2 PO QHS			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31

WINGFOR 04/01/12 THROUGH 04/30/12 PAGE 1 OF 1

NAME MASSEY, TAMI

Physician NO KNOWN ALLERGIES

Medical Record No.

Alt. Telephone

Responsible Potenti

GCSO Young 000043

By: [Signature]

Date: 08/17/11

998

Print

Page 1 of 1

Subject: Re: Tony Youn [REDACTED]
From: tamimasseynd@yahoo.com (tamimasseynd@yahoo.com)
To: srbouk@yahoo.com;
Date: Thursday, January 26, 2012 10:06 PM

600mg bid is ok
Sent from my Verizon Wireless BlackBerry

From: Sherry Bouknight <srbouk@yahoo.com>
Date: Thu, 26 Jan 2012 13:45:14 -0800 (PST)
To: Tami Massey <tamimasseynd@yahoo.com>
Reply To: Sherry Bouknight <srbouk@yahoo.com>
Cc: Kayla <kaylamc88@gmail.com>; Courtney <courtney_12507@yahoo.com>
Subject: Tony Youn [REDACTED]

Tony Young, [REDACTED]

Can his Gabopentin 300mg qam and 600mg qhs be increased. This is the guy that you saw last week for neck pain and increased from 300mg bid to above dose.

Awaiting orders.

I am getting ready to leave for the day and I won't be here on Friday, please respond to Kayla () she will be here until 12 and Courtney will be here after that until 7pm (courtney_)

Thanks,
Sherry, MTA 7242

<http://us.mg5.mail.yahoo.com/neo/launch?.rand=f00jpscs0ieci>

GCDC Young 000119
01/30/2012



Print

Page 1 of 1

Subject: Re: Tony Young, 9-5-08, NKDA
From: Sherry Bouknight (srbouk@yahoo.com)
To: tamimasseynd@yahoo.com;
Date: Thursday, December 8, 2011 8:45 AM

yes. I will advise him in that direction. Thanks

From: "tamimasseynd@yahoo.com" <tamimasseynd@yahoo.com>
To: Sherry Bouknight <srbouk@yahoo.com>
Sent: Wednesday, December 7, 2011 6:10 PM
Subject: Re: Tony Young, [REDACTED] NKDA

Is it available on canteen?
Sent from my Verizon Wireless BlackBerry

From: Sherry Bouknight <srbouk@yahoo.com>
Date: Wed, 7 Dec 2011 12:14:40 -0800 (PST)
To: tamimasseynd@yahoo.com <tamimasseynd@yahoo.com>
ReplyTo: Sherry Bouknight <srbouk@yahoo.com>
Subject: Re: Tony Young, [REDACTED] NKDA

He said he has been in so much pain since it was stopped (1 dose missed of IBU). He said neck, back, arms and head. This is also the guy you saw with c/o neuropathy in hand and arm that was broken but said he was not and had not been doing the therapy and stretches instructed by the ortho md

From: "tamimasseynd@yahoo.com" <tamimasseynd@yahoo.com>
To: Sherry Bouknight <srbouk@yahoo.com>
Sent: Wednesday, December 7, 2011 3:09 PM
Subject: Re: Tony Young, [REDACTED] NKDA

Does he still need it? Where are his complaints? I imagine it can be stopped
Sent from my Verizon Wireless BlackBerry

From: Sherry Bouknight <srbouk@yahoo.com>
Date: Wed, 7 Dec 2011 11:04:13 -0800 (PST)
To: Tami Massey <tamimasseynd@yahoo.com>
ReplyTo: Sherry Bouknight <srbouk@yahoo.com>
Subject: Tony Young, [REDACTED] NKDA

Dr. Massey,
I/m has been on IBU 200mg x3 BID since 9/24/11. I discontinued the medication due to the duration of taking it. Discontinued his Naproxen at his request. I discontinued the first dose last night and this morning at am pass he is asking if he can have 1 dose a day at night? This is the man that was in the car wreck that hit a tractor going down the road. He has been cleared and released from all doctors that he was seeing. Awaiting your response.
Thank,
Sherry Bouknight

2/12-13-11

GCDC Young 000120

<http://us.mg5.mail.yahoo.com/neo/launch?.rand=d7j71q71cejm3>

12/08/2011



Incident # 12-0408

Original
given to
Capt. Middleton

INCIDENT DATE: 02/12/2012

INCIDENT TIME: 2015

INCIDENT LOCATION: BOOKING AREA

YOUNG, TONY

RECEIVED 1 5 PM - 50

OFFICER HEATH GAVE ME MESSAGE TO CALL GLORIA BORDELON AT 864-209-6724. WHEN I CALLED HER SHE WANTED TO SPEAK TO ME ABOUT WHY INMATE YOUNG HAD NOT BEEN RECEIVING HIS MEDICATION FOR GOUT. I TOLD HER THAT THE NURSE IS GONE FOR THE NIGHT AND THAT IS WHO SHE WOULD NEED TO SPEAK TO. SHE SAID HE HAS GONE WITHOUT HIS MEDICATION FOR SEVERAL DAYS AND WAS IN PAIN. SHE SAID IT WAS TO THE EXTENT THAT HE WAS NOT EATING BECAUSE OF THE PAIN. I TOLD HER I JUST SPOKE TO INMATE YOUNG AND HE DID NOT MENTION ANY PROBLEMS. SHE SAID WELL HE HAS HAD MANY PROBLEMS AT OUR FACILITY AND HAS FILLED OUT GRIEVANCES ABOUT HIS PROBLEMS. SHE ALSO WANTED TO COMPLAIN ABOUT SEVERAL OFFICERS. I ASKED WHO THE OFFICERS WAS AND IF THEY WERE ON MY SHIFT I WOULD ADDRESS THE ISSUES WITH THE OFFICERS. SHE DID GIVE ME SEVERAL NAMES BUT THESE OFFICERS ARE ON ANOTHER SHIFT. SHE ALSO WANTED COPIES OF ALL GRIEVANCES INMATE YOUNG HAS FILLED OUT. I TOLD HER I DIDN'T KNOW IF THAT WAS POSSIBLE. I TOLD HER THE BEST THING TO DO WAS TO CONTACT OUR MEDICAL DEPARTMENT TOMORROW ABOUT THE MEDICAL ISSUES AND CONTACT MAJOR SMITH REGARDING THE PROBLEMS WITH OFFICERS. MRS. BORDELON SAID SHE WOULD JUST CONTACT HER LAWYER TOMORROW.

ACTION TAKEN: WROTE REPORT AND PLACED A COPY OF REPORT IN LT BUTLER'S BOX, CAPTAIN MIDDLETON'S BOX, AND MAJOR SMITH'S BOX.

REPORTING OFFICER: SGT BOLLMAN

No medication has been skipped or missed.
On 2/12/12 1/m is 5 days into his Indocin
medication for Gout. 1/m has voiced & c/o pain
but was asked by MTA 2/13/12 during an
med pass "how he was" & he stated "much
better" & he was walking fine. Y/m also saw
MD on 2/13/12 & refused medication for pain/inflammation
Sgt. Bollman

02/15/2012 10:03

1 of 1

GCDC Young Medical 000034



Clinical Pathways / Patient Clinical Data Form

Use for (circle): MOUTH IRRITATION **TOOTHACHE** JAW PAIN

Instructions: Upon patient's complaint(s), please complete the form in its entirety. Check YES answers. If not checked, it is considered a NO answer. Refer to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as needed. The completed form should be placed in the medical chart for future reference and/or review by the site physician.

Patient's Name: Tony Phung DOB: [REDACTED]
 Onset of Symptoms couple days Duration _____
 Pain Location front upper teeth Describe Pain hurts to eat
 Level of Pain (1-10) 6 Does Pain increase with eating? yes Affected by Hot/Cold Food yes
 Have you had this pain before _____ If YES, what was the cause and how was it treated? _____
 Recent dental work? _____ Recent injury to mouth yes to jaw _____
 Are you taking any medications? _____ If yes car wreck broke tooth off
 Any Allergies: ALL
 Further comments _____

CLINICAL DATA: B/P 140/98 Pulse 63 RESP _____ Temp _____ Wt _____
 Swelling ☒ Redness ☒ Drainage _____ Bruising/Lesions _____ Decayed tooth/teeth ☒
 Abscessed tooth/teeth ☒ Missing Filling(s) _____ Bleeding _____ where _____
 If Bruising/Lesions, describe: _____
 Able to speak ☒ White spots on Tongue, Cheeks, or oral cavity _____ Face symmetrical _____
 Bone projections _____ Obvious recent jaw injury _____
 Facial edema or warmth to affected side ☒
 Does patient have a Chronic Illness NO If yes, describe _____

TREATMENT PLAN: Suspect Fx Jaw _____ TMJ _____ Toothache ☒ Follow tx protocol _____
 If no, describe plan Amoxicil 500mg 1 cap PO qam 2cap PO qns

Physician's Order: _____

IM advised to alert staff of changes: Yes ☒ Patient education information supplied/discussed? Yes ☒
 Placed on dental list if applicable? Yes _____

Medical Signature: [Signature] Date: 11/5/11

- also informed ilm to put
in grievance to cpt. to
get tooth pulled.

Clinical Pathways / Patient Clinical Data Form

Use for (circle): **STRAIN(s)** **SPRAIN(s)** **PAIN** **BACK PAIN** **EDEMA**

Instructions: Upon patient's complaint(s), please complete the form in its entirety. Check YES answers. Unchecked answers are considered NO answers. Refer to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as needed. The completed form should be placed in the medical chart for future reference and/or review by the site physician.

Patient's Name: Tommy Young DOB: [REDACTED]

When did this occur week to Where did this occur _____
 How did this happen back to back
 Location of injury neck / back Level of pain (1/10) 6 Constant yes Intermittent yes
 Does pain increase with movement yes Any hx of this pain before yes - week
 Numbness N If yes, where _____ Tenderness N
 Swelling N Bruising N Color of bruises _____ Dizziness N Weakness N Nausea N
 Vomiting N Urine changes: Color _____ Odor _____ Frequency _____
 Any chronic conditions or bleeding tendencies _____
 Amount of fluids consumed daily: _____ Any fever N Chills NO
 Taking any meds? yes If yes, list (include OTC) Lorazepam, Gabapentin
 Any allergies N/A
 Further comments _____

CLINICAL DATA: B/P 121/82 Pulse 105 RESP 18 Temp _____
 Deformity _____ (if yes) Describe _____
 Size of bruise if present _____ Any crepitus at areas of tenderness _____
 Any guarding _____ (if yes) Describe _____
 Any limit to range of motion _____ Posture during assessment _____
 Peripheral pulse quality _____ Edema present _____ Pitting edema _____
 Skin: Warm _____ Dry _____ Cool _____ Moist _____ Flushed _____ Pale _____ Race Appropriate _____
 Does injury correspond with history given _____ If not, why _____
 Comments _____

TREATMENT PLAN: Follow tx protocol _____ If Urine Dip done-note Results on Urine Dip Form & attach to this CP
 If no, describe plan prescribed Carislen Aleve but give 1x dose of Tylenol today
 Physician's Order: _____

Inmate advised to alert staff of changes and/or improvement: Yes ✓ No _____
 Patient education information supplied and/or discussed? Yes ✓ No _____
 Medical Staff Signature: SBauger Date: 12-12-11
 Physician/Provider initials as confirmation of strain _____



Clinical Pathways / Patient Clinical Data Form

Use for (circle): STRAIN(s) SPRAIN(s) PAIN BACK PAIN EDEMA

Instructions: Upon patient's complaint(s), please complete the form in its entirety. Check YES answers. Unchecked answers are considered NO answers. Refer to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as needed. The completed form should be placed in the medical chart for future reference and/or review by the site physician.

Patient's Name: Tony Young DOB [REDACTED]

When did this occur prior to arrest Where did this occur

How did this happen truck

Location of injury neck/back Level of pain (1/10) 6 Constant Intermittent ☒

Does pain increase with movement Any tx of this pain before

Numbness If yes, where Tenderness

Swelling Bruising Color of bruises Dizziness Weakness Nausea

Vomiting Urine changes: Color Odor Frequency

Any chronic conditions or bleeding tendencies

Amount of Fluids consumed daily Any fever Chills

Taking any meds? If yes, list (include OTC) Loratadine

Any allergies NKOA

Further comments

CLINICAL DATA: BP 128/80 Pulse 69 RESP 18 Temp

Deformity (if yes) Describe

Size of bruise if present Any crepitus at areas of tenderness

Any guarding (if yes) Describe moves slow & turns slow

Any limit to range of motion Posture during assessment erect

Peripheral pulse quality Edema present Pitting edema

Skin: Warm ☒ Dry ☒ Cool Moist Flushed Pale Race Appropriate ☒

Does injury correspond with history given If not, why

Comments

TREATMENT PLAN: Follow tx protocol If Urine Dip done-note Results on Urine Dip Form & attach to this CP

if no, describe plan 1bu 200mg X 3 X 1 dose

Physician's Order:

Inmate advised to alert staff of changes and/or improvement: Yes ☒ No

Patient education information supplied and/or discussed? Yes ☒ No

Medical Staff Signature: [Signature] Date: 12-20-11

Physician/Provider Initials as confirmation of strain [Signature] 12-21-11

GCSO Young 000099

1/ Patient Clinical Data Form

MOUTH IRRITATION TOOTHACHE JAW PAIN

Patient's complaint(s), please complete the form in its entirety. Check YES answers. If not checked, it is considered a to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as npleted form should be placed in the medical chart for future reference and/or review by the site physician.

Name: Tony Young

DOB [REDACTED]

Symptoms Location Top (2) Duration Since 12-22-11 pm
 of Pain (1-10) 2 Describe Pain feels like its swelling
 Does Pain increase with eating? ✓ Affected by Hot/Cold Food? ✓
 Did you have this pain before? ✓ If YES, what was the cause and how was it treated? Abx.
 Recent dental work? ✓ Recent injury to mouth ✓ to jaw ✓ - in auto accident &
 Are you taking any medications? ✓ If yes merg broke teeth
 Any Allergies: None
 Further comments _____

CLINICAL DATA: B/P 134/95 Pulse 74 RESP 20 Temp 97.9 W
 Swelling _____ Redness _____ Drainage _____ Bruising/Lesions _____ Decayed tooth/teeth ✓
 Abscessed tooth/teeth ✓ Missing Filling(s) _____ Bleeding _____ where _____
 If Bruising/Lesions, describe: _____
 Able to speak ✓ White spots on Tongue, Cheeks, or oral cavity 0 Face symmetrical slight
 Bone projections _____ Obvious recent jaw injury _____ Ant of swelling to cheek
 Facial edema or warmth to affected side ✓ slight
 Does patient have a Chronic Illness _____ If yes, describe _____

TREATMENT PLAN: Suspect Fx Jaw _____ TMJ _____ Toothache ✓ 100mg
 If no, describe plan Amoxicillin 500mg 1 PO QAM 2 PO QHS Follow by protocol

Physician's Order: _____

IM advised to alert staff of changes: Yes ✓ Patient education information supplied/discussed? Yes ✓
 Placed on dental list if applicable? Yes ✓

Medical Signature: [Signature] Date: 12-23-11

Clinical Pathways / Patient Clinical Data Form



Use for (circle): MOUTH IRRITATION **TOOTHACHE** JAW PAIN

Instructions: Upon patient's complaint(s), please complete the form in its entirety. Check YES answers. If not checked, it is considered a NO answer. Refer to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as needed. The completed form should be placed in the medical chart for future reference and/or review by the site physician.

Patient's Name: Tony Young DOB: [REDACTED]
 Onset of Symptoms 3 days ago Duration _____
 Pain Location Back (R) tooth Describe Pain "throbbing"
 Level of Pain (1-10) 1 Does Pain increase with eating? YES Affected by Hot/Cold Food YES
 Have you had this pain before? YES If YES, what was the cause and how was it treated? no tx
 Recent dental work? NO Recent injury to mouth NO to jaw NO
 Are you taking any medications YES If yes *see MMR*
 Any Allergies: NKA
 Further comments _____

CLINICAL DATA: B/P 112/92 Pulse 74 RESP 18 Temp 98.4 Wt _____
 Swelling slight Redness YES Drainage NO Bruising/Lesions NO Decayed tooth/teeth YES
 Abscessed tooth/teeth NO Missing Filling(s) NO Bleeding NO where Back (R) tooth
 If Bruising/Lesions, describe: none
 Able to speak YES White spots on Tongue, Cheeks, or oral cavity NO Face symmetrical YES
 Bone projections NO Obvious recent jaw injury NO
 Facial edema or warmth to affected side NO
 Does patient have a Chronic Illness NO If yes, describe _____

TREATMENT PLAN: Suspect Fx Jaw _____ TMJ _____ Toothache YES Follow tx protocol _____
 If no, describe plan ibu 200mg po x 1 day dose
App already ordered

Physician's Order: _____

IM advised to alert staff of changes: Yes _____ Patient education information supplied/discussed? Yes _____
 Placed on dental list if applicable? Yes _____

Medical Signature: Kimber Jullio, RN Date: 12/25/11

GCDC Young 000179

Confidential Medical Work Product

Filename: 10/07 Rev 7/10

Clinical Pathways / Patient Clinical Data Form

Use for (circle): **TOOTHACHE** MOUTH IRRITATION JAW PAIN

Instructions: Upon patient's complaint(s), please complete the form in its entirety. Check YES answers. If not checked, it is considered a NO answer. Refer to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as needed. The completed form should be placed in the medical chart for future reference and/or review by the site physician.

Patient's Name: Tony Young DOB [REDACTED]

Onset of Symptoms _____ Duration _____
Pain Location _____ Describe Pain _____
Level of Pain (1-10) _____ Does Pain increase with eating? _____ Affected by Hot/Cold Food _____
Have you had this pain before? If YES, what was the cause and how was it treated? _____
Recent dental work? _____ Recent injury to mouth _____ to jaw _____
Are you taking any medications _____ If yes _____
Any Allergies: _____
Further comments: _____ *Write to Administration*

CLINICAL DATA: B/P _____ Pulse _____ RESP _____ Temp _____ Wt _____
Swelling _____ Redness _____ Drainage _____ Bruising/Lesions _____ Decayed tooth/teeth _____
Abscessed tooth/teeth _____ Missing Filling(s) _____ Bleeding _____ where _____
If Bruising/Lesions, describe: _____
Able to speak _____ White spots on Tongue, Cheeks, or oral cavity _____ Face symmetrical _____
Bone projections _____ Obvious recent jaw injury _____
Facial edema or warmth to affected side _____
Does patient have a Chronic illness _____ If yes, describe _____

TREATMENT PLAN: Suspect Fx Jaw _____ TMJ _____ Toothache _____ Follow tx protocol _____
If no, describe plan _____

Physician's Order: _____

IM advised to alert staff of changes: Yes ☒ Patient education information supplied/discussed? Yes ☒
Placed on dental list if applicable? Yes ☒

Medical Signature: Sherry Bruckner (LA) Date: 12-27-11
MTA

12-27-11

GCDC Young 000177

Clinical Pathways / Patient Clinical Data Form

Use for (circle): HEADACHE HEAD INJURY DIZZINESS VERTIGO

Instructions: Upon patient's complaint(s), please complete the form in its entirety. Check YES answers. Refer to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as needed. The completed form should be placed in the medical chart for future reference and/or review by the site physician.

Patient's Name: Tony Young DOB: [REDACTED]

Onset: 3-4 days Chronic ☐ Sudden ☐ Injury location: was in car wreck before arrested
 Pain from Lights: ☐ Noise ☐ Movement ☐
 Any history of head injury? ☒ If yes, when Prior to arrest
 Did inmate report seizure history or head injury on screening form? Yes ☐ No ☒
 Did inmate report history of Migraine or Sinus problems? No ☒ Yes ☐ If Yes, what is noted:

Has inmate had any recent infections? ☒ If Yes, what tooth - to antibiotic
 Any allergies NKA Any current medications
 Any Rx reported: If Yes, list (consider OTC)
 Has inmate had this problem before? ☒ If Yes, when Often
 What was the cause/treatment BUPROP
 Any chronic conditions or bleeding tendencies no
 Has inmate been reported to have any behavioral changes or emotional events recently? no If Yes, please note
 Further comments

CLINICAL DATA: B/P 111/80 Pulse 84 RESP 20 Temp 98.3
 Deformity no (If yes) Describe
 Neuro: Oriented ☒ Alert ☒ Confused ☐ Cooperative ☒ Calm ☒
 Lethargic ☐ Anxious ☐ Agitated ☐
 Is recall diminished? ☐ If yes, explain
 Gait steady? ☒ Station steady? ☒ Grips? = Hematoma no Dizzy no
 Vomiting no Neck tenderness no Weakness no Does inmate display photophobia? no
 PEARLA? equal EOMS intact? ☒ Resp Non-Labored ☒ Labored ☐
 Skin = Warm ☒ Dry ☒ Cool ☐ Moist ☐ Flushed ☐ Pale ☐ Race appropriate ☒
 Are ears flushed ☐ Ear drainage ☐
 Comments

TREATMENT PLAN: Call EMS Follow tx protocol
 If no, describe plan ibuprofen 1000mg PO 1x dose
 Placed on some type of Monitoring/rechecks If no, why
 Physician's Order:

IM advised to alert staff of changes: Yes ☒ Patient education information supplied/discussed? Yes ☒

Medical Staff Signature: Kayla [Signature] Date: 1-15-12

Physician/Provider Initials as confirmation of review of information

GCDC Young 000172

Clinical Pathways / Patient Clinical Data Form

Use for (circle): STRAIN(s) SPRAIN(s) **PAIN** BACK PAIN EDEMA

Instructions: Upon patient's complaint(s), please complete the form in its entirety. Check YES answers. Unchecked answers are considered NO answers. Refer to the Treatment Guidelines Manual for further implementation, or feel free to contact your site physician for orders as needed. The completed form should be placed in the medical chart for future reference and/or review by the site physician.

Patient's Name: Tony Young DOB: [REDACTED]

When did this occur _____ Where did this occur Accident before brought to JA
How did this happen Accident (car)

Location of injury neck Level of pain (1/10) 7 Constant _____ Intermittent ✓

Does pain increase with movement _____ Any hx of this pain before yes

Numbness _____ If yes, where _____ Tenderness _____

Swelling ✓ Bruising ✓ Color of bruises ✓ Dizziness ✓ Weakness ✓ Nausea ✓

Vomiting ✓ Urine changes: Color ✓ Odor _____ Frequency _____

Any chronic conditions or bleeding tendencies no

Amount of Fluids consumed daily _____ Any fever no Chills no

Taking any meds? ✓ If yes, list (include OTC) gabapentin

Any allergies _____

Further comments have emailed dad for orders, currently awaiting

CLINICAL DATA: B/P 137/57 Pulse 87 RESP 20 Temp 98.2

Deformity _____ (if yes) Describe _____

Sizes of bruise if present _____ Any crepitus at areas of tenderness _____

Any guarding _____ (if yes) Describe _____

Any limit to range of motion _____ Posture during assessment _____

Peripheral pulse quality _____ Edema present _____ Pitting edema _____

Skin: Warm ✓ Dry ✓ Cool _____ Moist _____ Flushed _____ Pale _____ Race Appropriate ✓

Does injury correspond with history given _____ If not, why _____

Comments insay the gabapentin isn't helping, he feels better when he is on it or 1BU or tylenol

TREATMENT PLAN: Follow tx protocol _____ If Urine Dip done-note Results on Urine Dip Form & attach to this CP

If no, describe plan 1BU loading PRN q 2 days

Physician's Order: _____

Inmate advised to alert staff of changes and/or improvement: Yes ✓ No _____

Patient education information supplied and/or discussed? Yes ✓ No _____

Medical Staff Signature: Kyle L. Hall Date: 1-27-12

Physician/Provider initials as confirmation of strain _____

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

Tony Young,)
Plaintiff,)
-vs-) C.A. No.: 8:11-2112-TMC
Greenwood County Detention)
Center and Greenwood County)
Sheriff's Office,)
Defendants.)

DEPOSITION OF DEBORAH KNOWLES
February 13, 2015

PURSUANT to Notice and/or agreement between
the parties, the deposition of Deborah Knowles, called
by the Defendants, was taken commencing at the hour
of 10:18 a.m. on Friday, February 13, 2015, at The
J.T. Hawkins Law Firm, LLC, 1225 South Church Street,
Greenville, South Carolina.

SUE N. HAYNIE, Reporter

Tony Young v. Greenwood County Detention Center, et al.

APPEARANCES:

THE J.T. HAWKINS LAW FIRM, LLC
1225 South Church Street
Greenville, South Carolina 29605
BY Josh T. Hawkins, Esquire
Brittany Miller

On behalf of the Plaintiff

CHAPMAN, HARTER & HARTER, P.A.
14 Lavinia Avenue
P. O. Box 10224
Greenville, South Carolina 29603
BY Russell W. Harter, Jr., Esquire
Carly M. Harter, Esquire

On behalf of the Defendants

ALSO PRESENT:

Lonnie Smith, Greenwood County Sheriff's Office

Tony Young v. Greenwood County Detention Center, et al.

STIPULATIONS:

This deposition is taken pursuant to the South Carolina
Rules of Civil Procedure; reading and signing of the deposition
by the witness are hereby waived.

EXHIBITS:

There were no exhibits to this deposition.

INDEX OF EXAMINATION

By Mr. Harter. Page 4
By Mr. Hawkins. Page 46
By Mr. Harter. Page 54
By Mr. Hawkins. Page 58

Tony Young v. Greenwood County Detention Center, et al.

DEBORAH KNOWLES, having first been duly sworn to
tell the truth, testified as follows:

EXAMINATION

By. Harter:

Q: Ms. Deborah Knowles, is that your name,
please?

A: Yes, sir.

Q: Your full name, please?

A: Deborah Lynn Knowles.

Q: Okay. And your home address, Ms. Knowles?

A: Ware Shoals, South
Carolina 29690, I think is the zip code.

Q: Okay. That's good enough. What is your age,
please ma'am?

A: 43.

Q: Okay. And tell me about your educational
background, Mrs. Knowles.

A: I got stuck in the ninth grade for three
years, quit, got married.

Q: Did you attend the ninth grade through the
ninth grade?

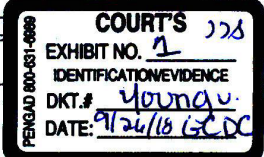
A: Three years in a row.

Q: Okay.

A: But I never went to the tenth or any further.

Q: I understand. Did you ever get any further

Tony Young v. Greenwood County Detention Center, et al.



1 education beyond that?
2 A: Uh-uh (negative response).
3 Q: Do you work, ma'am?
4 A: No, I'm disabled.
5 Q: Okay. What is your disability?
6 A: Agoraphobia.
7 Q: I'm sorry, I couldn't hear.
8 A: Agoraphobia, panic attack, and now it's liver
9 failure.
10 Q: I saw that. What kind of liver problem do you
11 have?
12 A: Basically, my weight. They believe my weight
13 and being a diabetic may have done some damage to my
14 liver. I have been living with it for approximately
15 eight years. I underwent having a stent put in my liver
16 to hold it open because I was retaining fluid.
17 Q: Okay.
18 MR. HARTER: Excuse me. We're in the middle
19 of a deposition here.
20 TONY YOUNG, JR.: I know. You said you were
21 supposed to be doing the subpoenas at the right time.
22 Mine is right now.
23 MR. HAWKINS: For the record, this is Tony
24 Young, Jr., has just come in the room and he has shown
25 defense counsel he's subpoena that indicates the time of

Tony Young v. Greenwood County Detention Center, et al.

1 the deposition is now.
2 MR. HARTER: No, it's 10:30. Your deposition
3 was at 10:30, sir.
4 TONY YOUNG, JR.: Yeah, and it's 10:30.
5 MR. HARTER: Okay. Well, we were delayed.
6 Okay. This lady's deposition was set at 9:30 and we
7 were delayed because we had a court matter because of an
8 issues. Now, here's your subpoena, sir, and I'll call
9 you when I'm ready for you, okay.
10 MR. HAWKINS: For the record, the witness is
11 correct, his subpoena is for 10:30 and it's almost 10:30
12 now.
13 MR. HARTER: That's correct. That is correct.
14 So you can step out and I'll call you.
15 Examination Resumed by Mr. Harter:
16 Q: You said you had a problem with your liver
17 because of what? I'm sorry, I got distracted there.
18 A: Being overweight. I'm also a diabetic and
19 it's just, it's all snowballing at one time.
20 Q: A combination of problems?
21 A: Yeah.
22 Q: Now, are you taking any medication now?
23 A: Yes.
24 Q: What medications do you take now?
25 A: I have it in my purse what I take for my

Tony Young v. Greenwood County Detention Center, et al.

1 liver.
2 Q: Okay.
3 A: It's pronounced Xifaxan.
4 Q: Okay, Xifaxan?
5 A: Yeah. It's like an antibiotic and it's for,
6 it has to do with the brain, fluid on the brain if I
7 don't take it twice a day.
8 Q: Okay.
9 A: I can get into a dangerous situation.
10 Q: I understand. What other medicine do you
11 take?
12 A: I take Effexor. Basically, it's been the
13 menopause. I take insulin for diabetes. Let's see. I
14 take Lyrica for diabetic nerve pain of the feet.
15 Q: Right.
16 A: If I have to, I take a very, a half a
17 milligram of Ativan, panic attacks, like I said, if I
18 need to.
19 Q: Now, do any of those medications affect your
20 ability to hear me and to understand my questions and to
21 give truthful answers today?
22 A: No.
23 Q: Ma'am?
24 A: I might ask you, like if you use a big word, I
25 might ask you to break it down.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Fair enough. And I might ask you to speak up
2 for me because sometimes I don't hear so good. But
3 we're here today to get information from you about this
4 case and what you know.
5 A: Uh-huh (affirmative response).
6 Q: And I need to cover a basic rules with you
7 first. And I'm going to be asking questions and you're
8 under oath and you understand that you're required to
9 answer those questions truthfully and we need to ask you
10 to give a verbal response. This lady is taking down
11 everything we say. She can't take down everything,
12 necessarily, that we do.
13 A: Okay.
14 Q: So we need to communicate verbally, okay. And
15 if there's anything about my question that you don't
16 understand, ask me to repeat it or rephrase it before
17 you try to answer it, okay? Okay?
18 A: Yes, sir.
19 Q: Alright. And if I accidentally interrupt you
20 and/or cut you off in the midst of an answer, please let
21 me know and we'll allow you to complete that answer.
22 Okay?
23 A: Yes, sir.
24 Q: Alright. Now, are you married, Ms. Knowles?
25 A: Yes.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: What is your husband's name?
2 A: Earl Richard Knowles.
3 Q: Earl Richard Knowles?
4 A: Now, we have been separated for four years. I
5 don't know where he's at.
6 Q: Okay. And what is your relation to Tony
7 Young?
8 A: He was my first husband. We have the three
9 children together.
10 Q: So your children are ...
11 A: Tony's children.
12 Q: ... Samantha ...
13 A: And Tony, Jr
14 Q: And Tony ...
15 A: And Jessica Shirley.
16 Q: ... and Jessica. Okay. Now, did I understand
17 that Tony works, Tony, Jr.?
18 A: I call him Trey.
19 Q: Trey, okay. We'll call him Trey. Does Trey
20 work?
21 A: Yes.
22 Q: How about Samantha?
23 A: She's a stay at home mom, but she has
24 children. Well, my oldest, she drives to school and
25 picks him back up.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Okay.
2 A: My son-in-law works second shift.
3 Q: Okay. Jessica ...
4 A: She's a stay at home mother but she also has
5 my oldest grandson. She takes him to school and picks
6 him up.
7 Q: Okay.
8 A: And my son-in-law, her husband, he works the
9 second shift.
10 Q: Now, where do you live now?
11 A: With Samantha.
12 Q: You live with Samantha.
13 A: Yeah.
14 Q: And how long have you lived with Samantha?
15 A: Ever since this whole situation happened, the
16 wreck, and everything.
17 Q: Okay. Were you living with her at the time
18 that Mr. Young had his accident?
19 A: They lived in this trailer, and me and my
20 mother lived in this trailer, and me and my son had to
21 walk pretty much close to a mile up the road to where
22 the accident happened because my daughter that I live
23 with was at the stop sign before the wreck. We lived on
24 down the road and she didn't know that it was her daddy
25 involved. And me and my son, we walked up there.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Okay. I maybe don't need all that detail, but
2 were you living with Samantha in August of 2011 when ...
3 A: I did not live in her house, beside her.
4 Q: You lived beside her. Okay.
5 A: Yes.
6 Q: Now, do you drive?
7 A: No. I have the neuropathy of the feet, I ...
8 Q: Did Tony Young ...
9 MR. HAWKINS: Objection. Please let the
10 witness finish.
11 Q: ... your ex-husband drive?
12 A: I didn't get to finish.
13 Q: Okay. Did Tony Young, your ex-husband drive?
14 MR. HAWKINS: Objection. It's appropriate to
15 let the witness finish her statement.
16 A: I choose not to drive because of the nerve
17 pain. That's the only reason. You can't understand
18 that, unless I'm sure you've seen the commercials on TV.
19 I don't trust my feet getting behind the wheel.
20 Q: Okay. My question is does Tony Young drive?
21 A: No.
22 Q: Okay. Was he driving back in August of 2011
23 when he was involved in this accident?
24 A: Yes, sir, he was. He had taken me to the
25 doctor that morning.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Okay. Do you know why he was driving --- Was
2 he driving Samantha's vehicle?
3 A: Yes.
4 Q: Okay. Did he drive that vehicle often?
5 A: No.
6 Q: How often did he drive it?
7 A: Just every once in a blue moon. It wasn't a
8 lot.
9 Q: Had you ridden with him in that vehicle
10 before?
11 A: That morning, like I said, he took me to the
12 doctor and he went to work.
13 Q: Before that morning, had you ridden with him
14 in that vehicle?
15 A: No, sir.
16 Q: Before that morning, had you ridden in a
17 vehicle with him?
18 A: I'm pretty sure. I wasn't, you know, we have
19 always been involved.
20 Q: Right. You've always been involved?
21 A: With our children.
22 MR. HAWKINS: Objection.
23 Q: Now, when did he lose his license, do you
24 know? Or did he?
25 A: That was probably back when we were teenagers

Tony Young v. Greenwood County Detention Center, et al.

1 and dating.
2 Q: Did he have a driver's license when y'all were
3 married?
4 A: I don't think so. To my knowledge, no.
5 Q: Okay. And when were y'all married?
6 A: May 6 of '88.
7 Q: '88?
8 A: Yeah.
9 Q: How long were you married?
10 A: Eight and a half years.
11 Q: So you were divorced about when?
12 A: We divorced in '96.
13 Q: '96. What were the grounds for the divorce?
14 MR. HAWKINS: Objection, relevance.
15 A: Yeah.
16 Q: What were the grounds for the divorce?
17 A: Does it really ...
18 Q: Yeah, what were the grounds for the divorce?
19 MR. HAWKINS: Objection, relevance.
20 MR. HARTER: Are you telling her not to
21 answer?
22 MR. HAWKINS: Did I say don't answer?
23 Q: Okay. Well, then answer.
24 MR. HAWKINS: Did I say not answer, Rusty. I
25 said, objection, relevance. She can answer if she

Tony Young v. Greenwood County Detention Center, et al.

1 wants.
2 MR. HARTER: No. Are you suggesting that she
3 has a choice to answer this?
4 MR. HAWKINS: I'm not suggesting, I object on
5 relevance.
6 MR. HARTER: Okay.
7 MR. HAWKINS: Because the rule says I need to
8 state the reason for my objection. If I'm wrong about
9 that, I'll be glad to ...
10 MR. HARTER: No, you're wrong again. You're
11 wrong again about that.
12 Q: Ms. Knowles, tell me the grounds for your
13 divorce from Tony Young.
14 MR. HAWKINS: Objection, relevance.
15 Q: Answer.
16 A: I really don't see where it matters.
17 Q: I understand, but answer.
18 A: Okay, we had an amicable split. I got off
19 work early, picked him up from his job. Went and came
20 up to Anderson. Went before the judge, we both went
21 back to work.
22 Q: Okay. But what were the grounds? There were
23 legal grounds for the divorce ...
24 MR. HAWKINS: Same objection.
25 Q: ... was it adultery, was it physical cruelty

Tony Young v. Greenwood County Detention Center, et al.

1 ...
2 A: No. No.
3 Q: ... was it alcohol or drug abuse? What was
4 it?
5 A: He drank but, I mean, he didn't do drugs.
6 Q: But did you make allegations in a lawsuit or
7 in a ...
8 A: We, basically ...
9 Q: Wait a minute and let me finish the question
10 now.
11 MR. HAWKINS: Objection.
12 A: I'm trying to answer.
13 Q: Let me finish the question. Did you make
14 allegations against him in a divorce action?
15 MR. HAWKINS: Object to the form.
16 Q: Did you?
17 MR. HAWKINS: Objection.
18 Q: Did you make allegations against him in a
19 divorce action?
20 A: It was a basic --- No, I did not. It was
21 just I paid for the divorce and \$75 to get my maiden
22 name back. It was just amicable.
23 Q: Okay. But usually people have grounds for
24 divorce when they do it. Did you make allegations of
25 your grounds for divorce against Mr. Young?

Tony Young v. Greenwood County Detention Center, et al.

1 A: He had a few beers on the weekends and I just,
2 I was very stern. I didn't, I didn't agree with it.
3 Q: Did you ...
4 A: I can't remember if it was, if I had, we have
5 been divorced since I was 25.
6 Q: Okay. Your divorce action was filed in
7 Anderson County?
8 A: My lawyer was from Anderson ...
9 MR. HAWKINS: Object to the form.
10 A: ... We went to the Anderson Court House, if
11 you would like to look it up.
12 Q: Okay. Who was your lawyer?
13 A: I don't even remember her name.
14 Q: Okay.
15 A: It's just been so long, I don't remember her
16 name.
17 Q: Now, have you ever been arrested for anything,
18 Ms. Knowles?
19 A: No, I have not.
20 Q: Do you drink alcohol?
21 A: No, I do not.
22 Q: When is the last time that you saw your ex-
23 husband, Tony Young?
24 A: When I've seen him drink?
25 Q: No, no. The last time you saw him?

Tony Young v. Greenwood County Detention Center, et al.

1 A: The last time I saw him was in the hospital
2 before Greenwood County come up there and jerked him
3 out of the hospital when he shouldn't have even left
4 there.
5 Q: Okay. That was at the hospital where?
6 A: Here in Greenville.
7 Q: Okay. Now, tell me, that would have been in
8 August of 2011?
9 MR. HAWKINS: Objection, leading.
10 Q: Is that right?
11 A: If that's the date they come and picked him up
12 in Greenville Hospital?
13 Q: Do you know when his car wreck was?
14 A: The car wreck was on the 10th, the 9th or the
15 10th.
16 Q: Okay. My question is, was that in August of
17 2011 that you went to the hospital and saw him?
18 A: I didn't get to see him for a couple of days.
19 He was in a medically induced coma.
20 Q: I understand.
21 A: Because of so many breaks.
22 Q: In August of the year 2011, is that right?
23 A: I came up to spend the night with him. I
24 can't tell you the date it was. It wasn't the next day
25 after the wreck.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Was it in August?
2 A: It was in August, but I wouldn't think it was
3 the next day or two.
4 Q: My question is, was it in August of the year
5 2011? I'm not asking the day, I'm asking the year and
6 the month.
7 A: Yes.
8 Q: Okay. Do we agree it was August of 2011 ...
9 MR. HAWKINS: Object to the form. You need to
10 let the witness finish testifying.
11 Q: Was it in August of 2011?
12 A: Yes.
13 Q: Okay. Now, how many days were you there with
14 him in the hospital in August of 2011?
15 A: I stayed over one night with him.
16 Q: One night?
17 A: Yeah. Because his children, you know, it's
18 hard for me to sit back. I had to let his children,
19 because they're grown, come up to the hospital and be
20 with him because he was in such serious shape.
21 Q: Right. I'm going to talk to his children I
22 hope to today. But how many days or nights did you
23 spend at the hospital?
24 A: One.
25 Q: One night?

Tony Young v. Greenwood County Detention Center, et al.

1 A: One night.
2 Q: Okay. Now, I believe he was in the hospital
3 from about August the 9th or 10th until about August the
4 16th. Do you know what days he was there or how many
5 days he was there?
6 A: He had the wreck on August 10.
7 Q: Okay. Alright. Now, were you there right
8 after he had the wreck or were you there when he was
9 taken ...
10 A: He had a ...
11 Q: Let me finish now. Were you there right after
12 the wreck or were you there when he was taken from the
13 hospital?
14 A: No, I was in Greenwood with my daughter when
15 she was being bullied by the cops.
16 Q: Okay. My question is, were you with, were you
17 at Greenville Memorial ...
18 A: No, I was ...
19 Q: Wait a minute. Let me finish now.
20 MR. HAWKINS: You didn't let her finish her
21 answer.
22 Q: No, no. Were you at Greenville Memorial
23 Hospital when Mr. Young was taken from the hospital to
24 the Detention Center in Greenwood?
25 A: No, I was not.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Okay. Now, did you talk to any of his
2 physicians when you were at the hospital?
3 A: He was, basically, you know, just I didn't see
4 any of the doctors. The children had talked to his
5 doctors. I just, I seen him in a way that I really
6 didn't want to see him.
7 Q: I understand. Did you talk to any of his
8 doctors while you were at GHS?
9 A: No, I did not. No, I didn't not.
10 Q: Do you know the names of any of his doctors at
11 GHS?
12 A: No. No.
13 Q: Were you at GHS or Greenville Hospital when he
14 was taken from the hospital to Greenwood?
15 A: No.
16 Q: Were you at GHS Hospital when he was
17 discharged?
18 A: No. His son was there.
19 Q: I understand. Okay. Now, did you ever see
20 him while he was at the Greenwood County Detention
21 Center?
22 A: Yes, I did, when he had his first hearing.
23 Q: Okay. Did you see him any other time while he
24 was at the Greenwood County Detention Center?
25 A: His daughter went and seen him. No, I did

Tony Young v. Greenwood County Detention Center, et al.

1 [REDACTED]
2 Q: Okay. And I appreciate that information. But
3 did you see him any other time other than at his first
4 hearing ...
5 A: No.
6 Q: ... while he was at the Greenwood County
7 Detention Center?
8 A: Just that one time at his hearing, that was
9 it.
10 Q: Was that a bond hearing?
11 A: I think it was.
12 Q: Where was it, ma'am?
13 A: It was in a magistrate's, it was one of them
14 big rooms in the Greenwood Detention.
15 Q: Who else was there?
16 A: It was me; my daughter, Samantha; her mother-
17 in-law, Dory. I don't know her last name.
18 Q: Dory?
19 A: Dory. It's her mother-in-law. Because she
20 knew the Sheriff. I can't remember his name, Tony or
21 something.
22 Q: And who else was there?
23 A: The guy that was injured on the tractor, his
24 brother, and the people that he worked for on that road.
25 Q: Okay. Who was the guy that was injured on the

Tony Young v. Greenwood County Detention Center, et al.

1 tractor?
2 A: All I know is his name was Flip.
3 Q: Flip?
4 A: And he was big.
5 Q: Was Flip there at that bond hearing?
6 A: No, he was in the hospital. He was in very
7 bad shape.
8 Q: Okay. Who else was at the bond hearing that
9 you remember?
10 A: Me and my daughter and her mother-in-law.
11 Tony was there, the cops that needed to be there, Flip's
12 brother.
13 Q: Flip's brothers?
14 A: Brother.
15 Q: Brother.
16 A: And his mama.
17 Q: Do you know their names, ma'am, his brother
18 and his mother.
19 A: I don't know their last names.
20 Q: Okay. How long did the bond hearing last, if
21 you know?
22 A: I'm going to say probably about 5 or 10
23 minutes. It was over before I even knew what was going
24 on.
25 Q: Did your ex-husband, Tony, have a lawyer

Tony Young v. Greenwood County Detention Center, et al.

1 representing him at the bond hearing?
2 A: No. He was supposed to have had a, what do
3 you call them?
4 Q: Public defender?
5 A: Yes, but it wasn't nobody there.
6 Q: Nobody showed up. Okay. Tell me what you
7 remember about the bond hearing, what was said.
8 A: The magistrate said what he said. The family
9 spoke up and said, they made like Tony was some big, you
10 know, monster or whatever, like they felt safer if he
11 was kept in jail. Tony's not that kind of person.
12 Q: I understand. That was Flip's family that was
13 speaking up?
14 A: Yeah. And they weren't letting Tony's family
15 have any kind of say.
16 Q: Who wasn't, the magistrate?
17 A: Yeah.
18 Q: Who was the magistrate, if you remember?
19 A: He's a cop down there. What's his name?
20 Q: He's what?
21 A: It's Tony or Tommy. Samantha's mother-in-law
22 knows him by name.
23 Q: Fair enough. Now, tell me, the bond hearing
24 you said lasted five to ten minutes.
25 A: Uh-huh (affirmative response).

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Is that a yes?
2 A: Yes.
3 Q: And you said Flip's family spoke out.
4 A: Yeah.
5 Q: And they made him out to be a monster.
6 A: Yes.
7 Q: And did y'all say anything to the magistrate
8 at that time, you or Tony or any of the family members?
9 A: We weren't give a chance. I might have popped
10 off with something, but I didn't get in trouble.
11 Q: Okay. Do you remember Tony saying anything at
12 that time?
13 A: No.
14 Q: Nothing?
15 A: He was in too much pain. He barely could
16 function.
17 Q: I understand. But my question is, do you
18 remember anything that he said at the bond hearing to
19 the magistrate?
20 A: He didn't say, he couldn't say nothing. He
21 didn't.
22 Q: He didn't say anything. Okay. Alright. Now,
23 following the bond hearing, I want to ask you, did you
24 see him at any time while he was at the Detention
25 Center?

Tony Young v. Greenwood County Detention Center, et al.

1 A: No, I left. My daughter would go and see him.
2 Q: Alright. And now, he got sentenced, I
3 understand, to SCDC in April of 2012.
4 MR. HAWKINS: Objection.
5 Q: Do you know that he got sentenced to SCDC?
6 A: I know he was sentenced to ...
7 Q: Let me ask you this. Did you go to court when
8 he was sentenced?
9 A: No.
10 Q: Okay. Have you seen him or visited him since
11 he was incarcerated in prison at SCDC?
12 A: We went down for his parole hearing here
13 recently.
14 Q: Okay.
15 A: That's the only time I've seen him.
16 Q: That's the only time you've seen him.
17 A: I don't talk with him on the phone.
18 Q: When was that parole hearing, if you know?
19 A: It just happened like a month or so ago.
20 Because he'd been in jail for like three years, since
21 the wreck.
22 Q: Right. And y'all's marriage was, y'all got
23 married in '88. Is that right?
24 A: Uh-huh (affirmative response).
25 Q: And you divorced in '96?

Tony Young v. Greenwood County Detention Center, et al.

1 A: Uh-huh (affirmative response).
2 Q: Is that right?
3 A: Yeah.
4 Q: Okay. Now, do you know anything about when he
5 was in prison at any other time other than now?
6 A: He'd never, he did like 50 something days for
7 violating probation at the Abbeville Farm. And then
8 when I had moved to here in Greenville with my husband,
9 he was at another place. I don't where, why, what was
10 going on. That's when my other marriage ...
11 Q: All I want to know is did you know that Mr.
12 Young, Tony Young, was in prison some other time other
13 than when he's there now.
14 A: Like I just said, he was at that --- I don't
15 know if it, I know he done that Farm, 50 days for
16 violating probation. And that's just, to me it's not
17 prison. I've never known him to be in prison.
18 Q: Okay. You've never known him to be in prison.
19 Okay. Alright. Now, did you say at the time back in
20 August of 2011 on the day of the accident, Tony Young
21 had taken you to the doctor?
22 A: Uh-huh (affirmative response), that morning.
23 Q: Okay. Was he drinking at that time?
24 A: No.
25 Q: Okay. Now, did you say he went to work?

Tony Young v. Greenwood County Detention Center, et al.

1 A: Yeah.
2 Q: And did he take you to the doctor and then
3 drive and go to work?
4 A: Uh-huh (affirmative response).
5 Q: Is that a yes?
6 A: Yes, sir.
7 Q: Okay. And where did he work?
8 A: He was painting. I can't even tell you the
9 man's name that he was painting for.
10 Q: Okay. Did he drive himself to work usually?
11 A: No.
12 Q: How did he usually get to work?
13 A: The man would come pick him up or my daughter
14 would take him.
15 Q: And Samantha would take him?
16 A: Right.
17 Q: Now, the place where y'all lived, you said,
18 now Samantha and her husband lived there?
19 A: Yes.
20 Q: Do they live in a home, a house, a trailer?
21 A: Where we live now?
22 Q: No, no, at the time back in 2011?
23 A: At the time they lived in a trailer on what's
24 the name of that road we lived on.
25 Q: Do they own that trailer or rent it?

Tony Young v. Greenwood County Detention Center, et al.

1 A: No, they rented it from the same people.
2 Q: Samantha and her husband were renting a
3 trailer, right?
4 A: Uh-huh (affirmative response).
5 Q: And then you lived where?
6 A: Right beside them.
7 Q: And you lived with ...
8 A: My mother.
9 Q: ... your mother. Did your mother, did she
10 rent or own?
11 A: She was renting and we lived together.
12 Q: Okay. Who else lived in that same area?
13 A: Lived on the other side, the man that was
14 injured on the tractor.
15 Q: Alright. Okay. Now, here's my question.
16 What did Tony Young look like at the bond hearing?
17 A: Horrible.
18 Q: Okay. Tell me how he looked.
19 A: Well, considering what the car looked like, he
20 looked a whole lot better. He had this massive burn on
21 his arm where he had ate some road because he hit the
22 tractor, went through the windshield. The only time
23 I've never known him not to put his seat belt on. Thank
24 God he didn't put it on because he went through the
25 windshield of the car. But he just, you could look in

Tony Young v. Greenwood County Detention Center, et al.

1 [REDACTED] his eyes, or I could anyway, and seen how much pain he
2 [REDACTED] was in.
3 Q: Okay.
4 A: He had burns all over him, but I remember that
5 one being really bad.
6 Q: On his left arm?
7 A: And I remember calling the Greenwood Police
8 Department and talking to the nurse and, you know,
9 telling them they needed to check up on him and do
10 something.
11 Q: Who did you talk to?
12 A: Some lady working. I didn't get no names.
13 Q: She said she was a nurse?
14 A: Yes.
15 Q: When was it that you made that call?
16 A: Right after the hearing when I seen the burns
17 and the pain he was in and how they was making him the
18 walker with the extended brace that the doctor made for
19 him. They were making him go up the steps, back down,
20 carrying. He had a broke neck, a broke pelvis, a broke
21 wrist, cuts, burns. He was just ...
22 Q: Okay. So this is at the bond hearing.
23 MR. HAWKINS: Objection. She should be given
24 a chance to answer.
25 Q: This is at the bond hearing?

Tony Young v. Greenwood County Detention Center, et al.

1 A: Like I said, it's a wonder he was still alive.
2 Q: I understand. Now, this was at bond hearing?
3 A: Yeah.
4 Q: Did he have a walker with him?
5 A: Yeah. And like I said, it had an extended
6 thing for his wrist because he had broke his wrist, but
7 he didn't have it in a cast.
8 Q: Okay.
9 A: And they were making him, wasn't even helping
10 him, they were making him walk up all the steps and back
11 down.
12 Q: Did he have any brace on his hands?
13 A: They did not cast it.
14 Q: No, did ...
15 A: They didn't do anything, no. They had like an
16 extra extension for the walker to where he was having
17 so, you know, hold.
18 Q: So he was in a walker? He had a walker?
19 A: You know, the walker. Some have wheels.
20 Q: Right. Did he have anything on his hands or
21 arms?
22 A: No.
23 Q: What did you mean by an extension?
24 A: About that tall, had a little thing where he
25 could rest his arm. The doctor kind of, you know, made

Tony Young v. Greenwood County Detention Center, et al.

1 what Tony could use.
2 Q: So there was something on his wrist to hold
3 it?
4 A: It was attached.
5 Q: To the walker.
6 A: Yeah.
7 Q: Okay. And did he have anything on his legs or
8 his knees or his neck or anything like that?
9 A: Well, he was burnt. I mean, he was cut and
10 burn places all over him.
11 Q: Were they exposed or were they wrapped up?
12 A: This one was exposed. It was not wrapped up,
13 it was just oozing pus.
14 Q: Okay.
15 A: About this long.
16 Q: About six inches long?
17 A: Uh-huh (affirmative response). It was on this
18 arm right here.
19 Q: You think it was on his right arm?
20 A: Uh-huh (affirmative response).
21 Q: Ma'am?
22 A: Yes, sir.
23 Q: Which arm did he have that contraption on to
24 hold it or brace it?
25 A: Right.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: His right?
2 A: Uh-huh (affirmative response).
3 Q: Ma'am?
4 A: Yes, sir.
5 Q: The hand that he writes with?
6 A: Yes.
7 Q: And he's right-handed?
8 A: Yes.
9 Q: Did he have any kind of brace on his neck or
10 head or anything?
11 A: He left the hospital with a collar on. They
12 got him back to Greenwood, and you can get this yourself
13 from the Jailbird, from that year. His mug shot was
14 taken with his collar on.
15 Q: Right.
16 A: The doctor said not to take it off.
17 Q: But did he have the collar on when you saw him
18 at the bond hearing?
19 A: Yeah.
20 Q: Ma'am?
21 A: As far as my knowledge, he had it on.
22 Q: At the bond?
23 A: The bond, yeah.
24 Q: Okay, great.
25 A: But the mug shot was took before that?

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Right. The mug shot was taken and it wasn't
2 on, but at the bond hearing it was on.
3 A: Yeah.
4 Q: And you're talking about a neck collar, neck
5 brace?
6 A: Uh-huh (affirmative response).
7 Q: Ma'am?
8 A: Yes, sir.
9 Q: Okay, good. Now, how long was that after he
10 got out of the hospital that that bond hearing was done?
11 A: It was a matter of days.
12 Q: And you never saw him again at the Detention
13 Center?
14 A: No, I did not. I let his children visit him.
15 Q: I understand. We're going to talk to his
16 children. Now, did you talk to him at the Detention
17 Center? I mean, did he phone you?
18 A: No.
19 Q: Or write you or anything?
20 A: No, I just talked with him and hugged him at
21 the bond hearing.
22 Q: But after the bond hearing and before he was
23 sentenced, you never saw ...
24 MR. HAWKINS: Object to the form.
25 Q: ... or had any communications with him at the

Tony Young v. Greenwood County Detention Center, et al.

1 Detention Center. Is that correct?
2 A: Could you repeat that?
3 Q: Yes. After the bond hearing and before he was
4 sentenced, you never had any communications or
5 conversations with Mr. Young while he was at the
6 Detention Center.
7 MR. HAWKINS: Object to the form.
8 Q: You can answer.
9 A: Like I said, and I hate to keep repeating
10 myself. I let his children go and see him. You know,
11 he was writing Samantha letters but ...
12 Q: I'm talking about you.
13 A: No.
14 Q: I'm not talking about Samantha, I'm not
15 talking anybody else, I'm talking about you.
16 A: No. But I keep telling you the same thing.
17 Q: I know. You keep telling me about ...
18 A: I'm going to keep ...
19 Q: ... children but I'm not asking about the
20 children, I'm asking about you.
21 A: I couldn't do anything.
22 Q: Fair enough. Okay. What did that brace look
23 like when you saw it on him at the bond hearing?
24 A: The neck collar?
25 Q: Yes.

Tony Young v. Greenwood County Detention Center, et al.

1 A: It's like what they put on them. I guess they
2 put it on him the night of the wreck or the day of the
3 wreck when he was air lifted to Greenville. It was a
4 safe collar or something. I don't know what you call
5 them. It's just like a beige tan color.
6 Q: But it was around his neck.
7 A: Yeah. They're very irritable. He didn't like
8 it, but he was told to wear it.
9 Q: Alright. I'm sorry, do what?
10 A: I'm asking him a question.
11 Q: No, we don't. If you've got any questions, we
12 need to talk about it to me.
13 MR. HAWKINS: I think she was indicating that
14 she needs a break and if she does, she can take one.
15 Q: Is that what you need?
16 A: Yes, sir.
17 Q: Okay, sure. We're going to take a break and I
18 do need to tell you that you should not discuss your
19 testimony with anybody while we're on a break. Do you
20 understand?
21 A: I'll be standing right outside the door.
22 Q: I trust you. I just need to tell you that
23 because you probably don't do this everyday.
24 A: No, I don't.
25 Q: And I want to make sure you understand that.

Tony Young v. Greenwood County Detention Center, et al.

1 (Off the Record)
2 Examination Resumed by Mr. Harter:
3 Q: Ms. Knowles, did you talk to anybody today,
4 excuse me. Have you talked to anybody about this case
5 before today?
6 A: Me and my kids, we don't talk about it
7 everyday but, you know, we want to see him come back
8 home.
9 Q: I understand. Have you talked to Mr. Hawkins
10 or his law firm or anybody about the case or the
11 information we're talking about today?
12 A: No. I was told to be here, but we did not
13 discuss anything over the phone.
14 Q: You've never talked to Mr. Hawkins at all
15 about this case?
16 MR. HAWKINS: Object to the form.
17 Q: Ma'am?
18 A: I mean, we had a brief discussion this
19 morning, but not really.
20 Q: Well, tell me about that discussion this
21 morning that you had.
22 A: It was just the way the hearing was going to
23 go down.
24 Q: Well, tell me everything you can remember
25 about that discussion this morning.

Tony Young v. Greenwood County Detention Center, et al.

1 A: I was told I could answer questions.
2 Q: You could what?
3 A: Answer a question. I don't have a problem
4 with answering. I hate to keep repeating myself, but I
5 don't mind answering any question you've got.
6 Q: Okay, I understand. What else were you told
7 this morning?
8 A: That was, basically, about it. I mean, I'm
9 not his client, Tony is.
10 Q: I understand that.
11 A: I'm just here, you know, to answer questions
12 about how he was treated.
13 Q: What else do you remember about any
14 conversations you've had with Mr. Hawkins or anybody
15 else about this case?
16 A: Nobody.
17 Q: You had no conversations this morning except
18 that you were told you should answer questions?
19 A: He went over and how this goes because I had
20 never been to one of these and he just, basically,
21 briefed us on how it would go.
22 Q: Okay, well tell me ...
23 A: Nothing ...
24 Q: Tell me what you remember him briefing you
25 about, what he said.

Tony Young v. Greenwood County Detention Center, et al.

1 A: Like I just said, you know, answer questions
2 or I don't have to or, I mean, it's just common sense.
3 Q: I understand. But I want to make sure we're
4 getting a handle on what he told you this morning.
5 A: We did not discuss ...
6 MR. HAWKINS: I'm going to put an objection on
7 the record that the same question has been asked four
8 times and she's answered it four times.
9 Q: Okay. Well, I'm not sure we have that answer,
10 it has been answered.
11 MR. HAWKINS: Four times.
12 Q: And don't interrupt me, Mr. Hawkins, please.
13 MR. HAWKINS: Four times.
14 Q: Now, will you tell me what conversations you
15 had this morning with Mr. Hawkins about this case.
16 A: Okay. Again, he just briefed me and the
17 children, not anything to do with the case just,
18 basically, how it would happen by a stenographer. I
19 think that's what you're called. But he said you might
20 have one of these little things. I've seen that done
21 before. And that's it.
22 Q: So he just told you you were going to answer
23 questions and that's it?
24 A: The only thing I can do is answer a question
25 to the best of my knowledge.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: But that's all he told you is that you're
2 going to answer questions? Is that all you understood?
3 MR. HAWKINS: Object to the form and object to
4 asking several times.
5 A: The only thing I can do. You ask me a
6 question, I will answer it.
7 Q: No. I want you to tell me ...
8 A: Can I finish. I will answer to the best of my
9 knowledge. That's all I can do.
10 Q: Alright. Here's the question, so we get it
11 straight and so we hopefully don't have to call anybody
12 else today.
13 MR. HAWKINS: Let's hope not.
14 Q: I want to make sure you tell me everything you
15 remember about your conversations with Mr. Hawkins
16 today.
17 A: He briefed us.
18 Q: On?
19 A: How this was going to go, plain and simple.
20 Q: You say he briefed you. What did he say when
21 he briefed you.
22 A: About the deposition. We have never been to
23 one. He briefed us on --- Ask him.
24 Q: I can't ask him.
25 A: That's all I can tell you. He just told us

Tony Young v. Greenwood County Detention Center, et al.

1 how, basically, you know, how it was going to go.
2 Q: Did y'all discuss anything about whether or
3 not Mr. Young had a collar on while he was in the
4 Detention Center?
5 A: Like I said, go back to Jailbirds. His mug
6 shot was taken without the collar on, plain and simple.
7 Q: The question is this morning before this
8 deposition, did you have discussions with Mr. Hawkins as
9 to whether or not Mr. Young had a collar on when he was
10 at the Greenwood County Detention Center?
11 MR. HAWKINS: Objection, asked and answered.
12 A: How many times do I have to say it?
13 Q: You just need to answer that question, ma'am.
14 A: With the collar, I mean, my thinking goes ...
15 Q: No. So you understand the question ...
16 MR. HAWKINS: She should be given a chance to
17 answer the question.
18 Q: Do you understand the question?
19 A: Maybe repeat it. I'm not sure.
20 Q: The question is, this morning when you talked
21 with Mr. Hawkins, did you discuss with him ...
22 A: I might have ...
23 Q: Let me finish now. This morning when you
24 talked with Mr. Hawkins, did you discuss with him or did
25 he discuss with you anything about Mr. Young having a

Tony Young v. Greenwood County Detention Center, et al.

1 collar on or off at the Greenwood County Detention
2 Center?
3 A: No. Me and the kids may have talked about it
4 and my son, because my son has it in his phone. But I
5 said, well just, you know, let you do the leg work if
6 you want the picture. I mean, it's right there in his
7 mug shot, no collar. That's all I've got to say about
8 it. Next question.
9 Q: The next question is, do I understand
10 correctly that you had no discussions with Mr. Hawkins
11 this morning about whether or not Mr. Young had a collar
12 on at the Detention Center?
13 MR. HAWKINS: Objection. Asked and answered.
14 A: Yeah. I've answered you.
15 Q: Did you have that discussion or not?
16 A: Not with him, only just the kids.
17 Q: That's fine. Now, when did you have that
18 discussion with the kids?
19 A: I think my son might have said something about
20 it and I said, "Well, you've got it on ..." he's got it
21 on his phone. And I just said, you know, if you wanted
22 it. I mean, like I just told you, you can do the leg
23 work. His mug shot, there's no collar. How many more
24 times have I got to say this before I pled the Fifth.
25 Q: This morning, did you have discussions with

Tony Young v. Greenwood County Detention Center, et al.

1 your children or did your children ...
2 A: My children. Please, let's go to the next
3 question.
4 Q: Ma'am, this morning, did you have discussions
5 with your children and Mr. ...
6 A: No, with my kids, with my children.
7 Q: Okay. This morning, did you have discussions
8 with your children about whether or not Mr. Young had a
9 collar on while he was at the Greenwood County Detention
10 Center?
11 A: With my children, yes.
12 Q: Where was that conversation?
13 A: We were talking amongst ourselves down there.
14 Q: Was Mr. Hawkins in the room?
15 A: He may have walked out or something another.
16 I don't --- This is getting to be confusing.
17 MR. HAWKINS: Yeah, what are you looking for,
18 Rusty?
19 Q: I think it's pretty obvious what I'm looking
20 for is the truth. And I'm looking for some information.
21 A: I told you, Jailbirds, it's there.
22 Q: Hold it.
23 A: I don't have to say it again. I mean, that's
24 just too much. Go to another question. I have no
25 problems answering your question.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Ms. Knowles, this morning, did you have
2 discussions with your children or your kids about
3 whether or not Mr. Young had a collar on at the
4 Greenwood County Detention Center?
5 A: Did I have a conversation with my children?
6 Q: Yes.
7 A: Yes.
8 Q: Tell me about that conversation.
9 A: I can't tell you exactly word for word how it
10 went down. But we were, you know, discussing it, like I
11 told you. I mean, I told my son, "Don't worry about
12 pulling it up." You could get it quicker than he could
13 do what he has to do with the Internet on his phone
14 getting pictures.
15 Q: Okay. Is that the only discussion you had
16 with your son, with your children this morning about the
17 ...
18 A: Honestly, I really don't ...
19 Q: I'm sorry. Let me finish now. Let me finish.
20 Is that the only discussion you had this morning with
21 your children or your son or your daughters about
22 whether or not Mr. Young had a collar on at the
23 Greenwood County Detention Center?
24 A: I've already answered and told you, yes, we
25 have talked about this many times. I mean, actually,

Tony Young v. Greenwood County Detention Center, et al.

1 what goes on with me and my kids going on is pretty much
2 our privacy and I've answered your question I don't know
3 how many times.
4 Q: Well, to the extent ...
5 A: How many different ways do you want me to put
6 this.
7 Q: To the extent it relates to the testimony or
8 facts of this case, it may not be private, okay. Did
9 your children attend the bond hearing?
10 A: Samantha was there.
11 Q: Did you and Samantha discuss anything about
12 whether or not your ex-husband, Tony Young, had a collar
13 on at the bond hearing?
14 A: Not at the bond hearing, no.
15 Q: Did she see the same thing you did?
16 A: You know, just that one sore.
17 Q: She would have seen the collar, too, though if
18 she saw him, right?
19 A: She probably remembers ...
20 MR. HAWKINS: Object to the form.
21 A: ... more than I do. I don't know. I mean,
22 ask her the same question as you've asked me, ask her.
23 Q: I'm going to ask her.
24 A: I don't have a problem.
25 Q: Ma'am?

Tony Young v. Greenwood County Detention Center, et al.

1 A: I don't have a problem. Ask her, ask Trey.
2 Q: I'm going to. But, now, did your son, Trey,
3 say anything this morning about seeing your ex-husband
4 at the Detention Center without a collar on?
5 MR. HAWKINS: Objection.
6 A: The way my son seen it was in the Jailbirds.
7 He took a picture on his phone.
8 Q: Okay. Now, did your son attend the bond
9 hearing?
10 A: No.
11 Q: Okay. To your knowledge, did your son or any
12 of your daughters visit Mr. Young at the Detention
13 Center while he was there?
14 A: Samantha.
15 Q: Okay. Did either Jessica or Tony visit while
16 he was there?
17 A: No.
18 Q: Now, what did Samantha tell you about visiting
19 her daddy at the Detention Center?
20 MR. HAWKINS: Objection.
21 A: I really never, she just went and spent time
22 with him.
23 Q: How many times did she visit him?
24 A: Pretty much every week till he was sent
25 further and further, when he got sentenced or whatever

Tony Young v. Greenwood County Detention Center, et al.

1 you want to call it.
2 Q: Okay. Alright.
3 MR. HARTER: Ms. Knowles, I don't have any
4 further questions.
5 A: Thank God.
6 MR. HARTER: I'm sorry, let me finish now. I
7 don't have any further questions for you at this time,
8 okay. Thank you.
9 A: Thank you.
10 -----
11 EXAMINATION:
12 By: Mr. Hawkins:
13 Q: I'm going to ask you some now. I'll be real
14 quick. You said that Mr. Young drives Samantha's
15 vehicle from time to time.
16 A: Every once in a while. It wasn't an ongoing
17 thing.
18 Q: Okay. And did he ever steal that vehicle?
19 A: No, sir.
20 Q: And you said your daughter was bullied by the
21 cops. What did you mean by that?
22 A: Well, where he was being taken --- I'm not
23 going to say what I said, but the State Trooper that
24 came up here and got Tony and my son was up here, and
25 basically, he got left at the hospital because Samantha

Tony Young v. Greenwood County Detention Center, et al.

1 was going to pick him up. But he had called Samantha
2 and was threatening to get her for harboring a fugitive
3 and she was still at home in Greenwood when we lived on
4 that, I can't remember the name of that road.
5 Q: That's alright. He was threatening her with
6 harboring a fugitive?
7 A: Yeah. To have her arrested for harboring a
8 fugitive.
9 Q: Do you remember his name?
10 A: I don't remember his name, but if somebody
11 said it, I could, you know, pick it out and tell you,
12 you know, that sounds right.
13 Q: Do you remember if it was a State Trooper or a
14 ...
15 A: It was a State Trooper.
16 Q: It was. Did at any time did a Greenwood
17 County employee make any of those threats or
18 communications?
19 A: No.
20 Q: Okay.
21 A: It was a State Trooper. The one, like I said,
22 me and my son had to walk to the wreck because my
23 daughter was on the other end trying to get home. And
24 he was, actually, the State Trooper that seen all the
25 sheaves and stuff that was in the, I go running up and

Tony Young v. Greenwood County Detention Center, et al.

1 he shows me Tony's ID and he asked me if that was him
2 and I said yeah. And they already had him in the
3 helicopter to be air lifted.
4 Q: Alright. And how many days passed between
5 when the wreck happened and when he was taken to
6 Greenwood, if you remember?
7 A: I'd say about a week, maybe a couple or ---
8 It wasn't, I mean, it wasn't long. They just jerked him
9 up and put him in jail.
10 Q: And was he healed yet?
11 A: No, not at all.
12 Q: Did he still have visible injuries when they
13 picked him up?
14 A: Yeah.
15 Q: Was he still in a good deal of pain or did he
16 appear to be?
17 A: Yeah. Yeah. They took his medicine and they
18 wouldn't give it to him. And I know it was narcotics
19 and, you know, I figured, you know, they wouldn't give
20 that but they do have like, like I said, I called the
21 nurse, you know, from time to time and asked her how he
22 was doing and if they were checking his, that one big
23 burn that was nasty looking, and he could have gotten
24 but they were charging him for it and he didn't have no
25 money to pay for it.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: So were they depriving him of medicine that he
2 needed?
3 MR. HARTER: Object to the form.
4 A: Yes, sir.
5 Q: And were they depriving him of medical care
6 that he needed?
7 MR. HARTER: Object to the form.
8 A: Yes, because he missed all of his
9 appointments, follow-up appointments up here.
10 Q: And when they took him down to Greenwood, did
11 they keep his collar from him?
12 MR. HARTER: Object to the form.
13 A: Well, like I said, I mean, like I said to him,
14 the mug shot, he doesn't have it on. It wasn't supposed
15 to come off and, I mean, that's just, I was scared to
16 death he was just going to, his head was just going to
17 topple off. He was just, he was in bad shape. I mean,
18 even though we are ex-husband and wife, we have remained
19 close because of our children. And it's just, it was a
20 hard thing for me to have to tell my, well, my son had
21 walked up on the wreck with me and then I had to sit
22 there and tell my daughter what happened to her daddy.
23 I mean, even when I got to hospital, they told me it
24 was, it was something. I wasn't ready to see him. I
25 didn't want, even though they were grown, they didn't

Tony Young v. Greenwood County Detention Center, et al.

1 need to go through this.
2 Q: Have you ever heard anything or do you have
3 any knowledge about him healing improperly because he
4 was denied appropriate medical care?
5 A: I have. I know personally ...
6 MR. HARTER: Object to the form.
7 A: ... that they had not let him see a doctor to
8 do CAT scans and x-rays to see, you know, the
9 imperfections.
10 Q: Okay.
11 A: Or he was not properly followed up care,
12 physical therapy and all that.
13 Q: Do you know if he was supposed to be given
14 something for physical therapy like a ball or something
15 like that?
16 A: Yeah, he was given that. And I don't really
17 think that they give it to him because that was, like I
18 said, it was the right arm that he, I know that had that
19 sore on it. And it is the right arm, the wrist he
20 broke. And I just, it was just, I don't know.
21 Q: Do you know how many broken bones he had?
22 A: Yeah, it was a broke neck, pelvis, wrist.
23 There may have been another break in there. My son can
24 tell you everything about that. I just know of the main
25 ones, his pelvis and back and neck.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Tell me about the brace on his wrist that was
2 absent when you saw him.
3 A: They never casted it or even put a splint or
4 ever how you do with a broke bone. He just, like I
5 said, he has a little extra piece made onto his walker.
6 Q: To rest it on.
7 A: Yeah.
8 Q: Now, eventually, he had a cast, so was that
9 after he went to jail?
10 A: I didn't see it. I did not see him. I let my
11 kids go see him. Samantha was the main one until he got
12 sentenced?
13 Q: Okay. Alright. And tell me about him walking
14 up the steps when he was injured?
15 A: They did not help him and he was having to go
16 up the, as far as my knowledge, they looked metal. He
17 had to go up and down with no help, you know, toting
18 that.
19 Q: Did he ever fall or anything?
20 A: No, thank God, he didn't.
21 Q: And was he in pain when he did that or do you
22 have any knowledge about that?
23 MR. HARTER: Object to the form.
24 A: He was in serious pain.
25 Q: And you said that you could look in his eyes

Tony Young v. Greenwood County Detention Center, et al.

1 and tell that he was in a great deal of pain?
2 A: Yeah.
3 Q: Tell me about that.
4 A: It's just to be that close and to know
5 somebody that well, you can look in somebody's eyes and
6 I know he was just, he was in a, I'm surprised he
7 didn't, you know, some people collapse, pass out with
8 pain. I'm surprised he wasn't doing any of that.
9 Q: Do you have any knowledge about any complaints
10 he made while he was in jail about not receiving medical
11 care or medicine?
12 A: He had called my daughter and that's when they
13 were going to give him, well, he couldn't pay for the
14 Advil and that's what they were going to give him, not
15 the medicine the doctor gave him. And that's when I
16 would call the nurse and, you know, tell her to check on
17 him, do what she can to help him.
18 Q: Did he ever complain about injuries to his
19 mouth or his teeth he sustained in the collision?
20 A: Not to my knowledge.
21 Q: Okay. Is there anything else that you feel
22 like is important that you need to put on the record
23 while we're on the record? You can say anything you
24 want.
25 A: I know Tony wasn't supposed, he shouldn't have

Tony Young v. Greenwood County Detention Center, et al.

1 been under the steering wheel drinking. You know,
2 either drinking or not, he didn't have a license. He
3 shouldn't have been out there drinking, but he is his
4 own boss and I chose to keep my son at home that day
5 even though he was almost 18. I wouldn't let him leave
6 the house, but it's been over three years now and the
7 man has healed. He's doing good. He's making his
8 threats because he got a letter stating that Tony was
9 coming up for parole. He's thinking bad threats.
10 And I'm ready for him to come home. He didn't make
11 his parole. I spoke at the hearing. My daughter and
12 my son-in-law spoke, and they didn't see fit to, you
13 know, let him go, so he will max out in like a year and
14 a few months. And I just, I'm ready for it to be over
15 with.

16 Q: Yeah. When you say he healed, do you mean
17 physically or he healed from drinking or what do you
18 mean?

19 A: His bones, just being in that serious kind of,
20 I mean, he could have been killed. He could have been
21 in a wheelchair. I mean, thank God he is walking
22 around. I mean, he's going to have some trouble out of
23 this where he had all those breaks.

24 Q: Do you think he would have less trouble going
25 forward if he ...

Tony Young v. Greenwood County Detention Center, et al.

1 A: If he had have had physical therapy

2 MR. HARTER: Object to the form.

3 Q: Do you think he would have healed better if he
4 had appropriate medical care?

5 MR. HARTER: Object to the form.

6 A: Yes.

7 Q: Do you think the lack of medical care that he
8 received contributed to his healing improperly?

9 MR. HARTER: Object to the form.

10 A: Yes.

11 MR. HAWKINS: That's all I have.

12 -----
13 EXAMINATION:

14 By: Harter:

15 Q: Do you have any medical training?

16 A: I read a lot of books. I've been through a
17 lot.

18 Q: Do you have any nursing training?

19 A: Oh, yeah, I was a nursing assistant but not a
20 nurse.

21 Q: You were a nursing assistant?

22 A: Yeah.

23 Q: When was that?

24 A: Let's see. It was back in the nineties. I
25 was working at NHC in Anderson.

Tony Young v. Greenwood County Detention Center, et al.

1 Q: What did you do then?

2 A: Took care of patients.

3 Q: Okay. And were you a CNA?

4 A: I was a nursing assistant, certified nursing
5 assistant. Aced my clinicals and everything.

6 Q: Have you reviewed Mr. Young's medical records?

7 A: He told us everything he was told.

8 Q: Have you reviewed his medical records?

9 A: I ain't read his records, but I know what
10 happened.

11 Q: Did you say he had a break to his right hand?

12 MR. HAWKINS: Object to the form.

13 A: His wrist,

14 Q: His wrist, right wrist?

15 A: I'm saying like, okay, this wrist and maybe
16 the burn, even when I went down for his bond hearing,
17 I didn't fully see him because he was just coated down.

18 Q: The question is did he have a break to his
19 right wrist, the hand he writes with?

20 MR. HAWKINS: Object to the form.

21 A: You can ask my son better, but I'm saying the
22 ...

23 Q: I'm asking you.

24 A: ... right because I'm having to remember me
25 being on this side of the table and Tony being on that

Tony Young v. Greenwood County Detention Center, et al.

1 side.

2 Q: Okay. Do you know which wrist was broken, the
3 ones he writes with or not?

4 A: That little, that little whatchamacallit
5 thing, it had to have been his right wrist.

6 Q: Okay. Did you say that he did not have any
7 follow-up medical appointments with any medical doctors
8 ...

9 A: He didn't have ...

10 Q: Let me finish now. Did you say that he did
11 not have any follow-up medical appointments with any
12 physician after he was taken to the Greenwood County
13 Detention Center?

14 MR. HAWKINS: Objection, mischaracterization
15 of the witness's testimony.

16 A: He had appointments he was not taken to then.

17 Q: Okay. You don't know if he was ever taken to
18 an appointment with ...

19 MR. HAWKINS: Objection, leading.

20 Q: Was he ever taken to any outside appointments
21 after he went to the Greenwood County Detention Center
22 for follow up with any orthopedist or any neurosurgeon?

23 A: No. Can ...

24 Q: I'm sorry, what was that?

25 A: I said are we good?

Tony Young v. Greenwood County Detention Center, et al.

1 Q: Yeah, yeah, we're good as long as we are
2 communicating and understanding and not interrupting ...
3 A: Well, why did you ask me if I was nurse?
4 Q: Ma'am?
5 A: Why did you ask me if I was a nurse or had any
6 medical training? Does it take somebody 15 years or
7 more to be, I mean, it's basically, common sense.
8 Q: Well, you know, it might be. It might be, but
9 then it might not be. I'm not the one to make that
10 decision. The Judge will make that decision, okay.
11 A: Okay.
12 Q: Now, did you ever look at any of the
13 medication administration records of the Greenwood
14 County Detention Center?
15 A: I haven't.
16 Q: Ma'am?
17 A: No, I've never seen anything Greenwood.
18 Q: Okay. Alright. And did you ever look at his
19 hospital records?
20 A: I didn't review them, but my son --- No, I
21 did not.
22 Q: My question is, did you ever look at his
23 hospital records?
24 A: No.
25 Q: Did you ever see any hospital record or

Tony Young v. Greenwood County Detention Center, et al.

1 discharge summary that related to Tony Young?
2 A: Personally, I did not.
3 Q: Right. Did you ever see any hospital record
4 or discharge summary that directed that he have physical
5 therapy?
6 A: No, I did not.
7 Q: Did you ever see any hospital record or
8 discharge summary to indicate that he needed any follow-
9 up dental care after his car wreck?
10 A: No, I did not, but he has had dental work, but
11 it wasn't related to the wreck.
12 Q: Okay. Did you ever see any hospital record or
13 discharge summary that indicated that he needed any kind
14 of ball to use with his hands?
15 A: I did not see any paperwork.
16 Q: That's my question.
17 A: Okay.
18 MR. HARTER: Thank you. We're done.

EXAMINATION:

21 By: Mr. Hawkins:
22 Q: I've got a couple of more. Do you think that
23 review of medical records or a discharge summary would
24 have in any way helped you see the pain that Mr. Young
25 was in?

Tony Young v. Greenwood County Detention Center, et al.

1 A: No.
2 Q: And do you need medical training or do you
3 need to see paperwork to know that he's complained of
4 not receiving appropriate medical care?
5 A: No.
6 MR. HAWKINS: That's it. That's all I have.
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24 (There being no further questions,
25 deposition concluded at 11:22 a.m.)

Tony Young v. Greenwood County Detention Center, et al.

STATE OF SOUTH CAROLINA)

: CERTIFICATE

COUNTY OF GREENVILLE)

This is to certify that the deposition of DEBORAH
KNOWLES, consisting of FIFTY-NINE (59) pages is a true and
correct transcript of the testimony given by said deponent
after being first duly sworn; said deposition was reported by
the method of Recording with Backup.

I further certify that I am neither employed by nor
related to any of the parties in this matter or their counsel;
nor do I have any interest, financial or otherwise, in the
outcome of same.

IN WITNESS WHEREOF I have hereunto set my hand and
seal this 5th day of March, 2015.

Sue N. Haynie
Court Reporter
Notary Public for South Carolina
My Commission Expires: 09/16/21

Tony Young v. Greenwood County Detention Center, et al.

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
Tony Young,	)	CASE NO. 2016-CP-24-157
Plaintiff,	)	
	)	
v.	)	VOIRE DIRE
	)	
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	
_____	)	
	)	

1. Does anyone have a strong opinion about jury trials in general?
2. Does anyone have a strong opinion about holding the government responsible for harm it has caused to a citizen?
3. Does anyone have any problems basing their decision solely on the harms and losses caused by the defendants in this case?
4. Does anyone work or have any relatives who work for the Sheriff's Office or the Detention Center?
5. Does anyone work or have any relatives who work in law enforcement?
6. Does anyone work or have any relatives who work in the field of health care?

Respectfully submitted,

Hawkins & Jedziniak, LLC

s/Joshua T. Hawkins

Joshua T. Hawkins, S.C. Bar #78470

1225 South Church Street

Greenville, South Carolina 29605

864-275-8142

864-752-0911 (f)

josh@jthawkinslaw.com

Greenville, South Carolina
September 21, 2018

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF’S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff’s Office,	)	
	)	
Defendants.	)	

Plaintiffs’ Request to Charge No. 1:

BURDEN OF PROOF—PREPONDERANCE OF EVIDENCE

In order for the Plaintiff to receive the compensation sought, it must be proven by a greater weight or preponderance of the evidence. The greater weight of the evidence may be illustrated by imagining a traditional set of scales. When the case begins, the scales are even. After all of the evidence has been presented, if the scales should remain even, or if they should tip, even slightly in favor of the Defendant, then the Plaintiff will have failed to meet her burden of proof, and your verdict would be for the Defendant.

If, on the other hand, the scales tip, even slightly, in favor of the Plaintiff, then she will have met her burden of proof, and your verdict would be for the Plaintiff.

Of course, there is no way to weigh evidence, except through the exercise of good common sense and judgment. It is entirely a mental process—and the evidence to which you should give the most weight is that which convinces you of its truth, regardless of whom or what source it comes. Ervin’s Requests to Charge §1-2.

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	

Plaintiffs' Request to Charge No. 2:

GROSS NEGLIGENCE

A Defendant is guilty of gross negligence if its actions are reckless, willful or wanton. The test for determining whether a tort may be deemed reckless, willful or wanton is whether it has been committed in such a manner and under such circumstances that a person of ordinary reason or prudence would have been conscious of it as an invasion of rights of the injured party. *Martin v. Martin*, 262 S.C. 168, 203 S.E.2d 385 (1974).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF’S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff’s Office,	)	
	)	
Defendants.	)	

Plaintiffs’ Request to Charge No. 3:

VIOLATION OF INTERNAL POLICIES OR PROCEDURES

In this case, the Plaintiff claims that the Defendant failed to comply with one or more of its own policies or procedures. Under South Carolina Law, where there is a relevant internal policy or procedure and the plaintiff shows the defendant violated the policy or procedure, the violation of the policy or procedure can be considered by you as evidence of recklessness, willfulness, and wantonness, and may be considered in connection with all other facts and circumstances surrounding the case in determining whether the defendant has been reckless, willful, and wanton. *Caldwell v. K-Mart Corp.*, 306 S.C. 27, 31, 410 S.E.2d 21, 24 (Ct. App. 1991); *Eastern Brick and Tile Co. v. United States*, 281 F. Supp. 216 (D.S.C. 1986); *Felder v. K-Mart Corp.*, 297 S.C. 446, 377 S.E. (2d) 332 (1989).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	

Plaintiffs' Request to Charge No. 4:

CAUSATION AND DAMAGES

A negligent Defendant may be held liable for anything which, after the injury, appears to have been a natural and probable consequence of the Defendant's act or omission and it is not necessary that he should have contemplated the particular event which occurred. *Culbertson v. Johnson Motor Lines*, 226 S.C. 13 (1954).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF’S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff’s Office,	)	
	)	
Defendants.	)	

Plaintiffs’ Request to Charge No. 5:

OCCURRENCE

The Plaintiff has alleged multiple occurrences of gross negligence. An occurrence is defined as an “unfolding sequence of events which proximately flow from a single act of negligence.” The Plaintiff has the burden of proving that each act of gross negligence was separate and independent in order for you to find that more than one occurrence occurred. *Boiter v. S.C. Dept. of Trans.*, 393 S.C. 123, 132-133; S.C. Code Ann. § 15-78-30(g); *Chastain v. AnMed Health Foundation*, 388 S.C. 170, 174.

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	
	)	

Plaintiffs' Request to Charge No. 6:

SCOPE OF DAMAGES

You should include in your award all damages which are naturally the proximate result of the Defendant's wrongful acts. *Mishoe v. Atlantic Coast Line Ry. Co.*, 186 S.C. 402, 197 S.E. 97 (1938).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	

Plaintiffs' Request to Charge No. 7:

ACTUAL DAMAGE FOR PHYSICAL INJURY

Actual damages for a Plaintiff who has been physically injured include pain and suffering as well as mental anguish, impairment of health or physical condition and disfigurement. The Plaintiff may also claim any medical expenses or medication expenses.

As with all other facts in this case, unless you are instructed otherwise, the Plaintiff must prove his actual damages by the greater weight of the evidence.

The amount of actual damages is that amount of money that will put the injured person in as near the same position as he would have been had he not been injured.

Coleman v. Levkoff, 128 S.C. 487, 122 S.E. 875 (1924); *Payne v. Holiday Towers, Inc.*, 283 S.C. 210, 321 S.E.2d 179 (Ct.App. 1984).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	

Plaintiffs' Request to Charge No. 8:

MENTAL SUFFERING

The injured party may recover for mental anguish brought about by bodily injury and suffering. If you find that the injured party is entitled to recover damages, you may consider as an element of those damages such pain and suffering and mental anguish that you find, to a reasonable certainty. In assessing mental anguish, you may take into account anxiety or worry experienced by the Plaintiff which resulted from the injuries that the Plaintiff received, if you are satisfied to a reasonable degree of certainty that the Plaintiff did suffer such anxiety and worry.

Ford v. A.A.A. Highway Express, 204 S.C 433, 29 S.E.2d 760 (1944); 22 Am.Jur. 2d Damages §119 (1965)

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF’S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff’s Office,	)	
	)	
Defendants.	)	

Plaintiffs’ Request to Charge No. 9:

DETERMINATION OF DAMAGES

In considering the issue of the Plaintiff’s damages and losses, the law provides that you shall assess the amount that you find to be justified by a preponderance of the evidence as full, just and reasonable compensation for all of the Plaintiff’s damages, no more and no less. This is what the law refers to as actual and compensatory damages. I instruct you that compensatory damages are not restricted to the actual loss of money or the actual loss of time. These damages include both mental and physical aspects of this injury, tangible and intangible, financial and otherwise. By reimbursing or compensating the Plaintiff for what she has lost, in all aspects, you are to attempt to restore the Plaintiff—that is to make her whole, or as she was immediately prior to her injuries.

Elements of Damage:

You should consider the following elements of damage, to the extent that you find they reproved by a preponderance of the evidence. You should place a value on each

element of damage, in accord with the evidence presented, and all these amounts together to determine the amount of your verdict. I instruct you that you shall evaluate each element of damage individually. The following are the various elements of damage which you may consider:

(a) Medical expenses: These shall include expenses incurred to date, and any which will be incurred in the future;

(b) Loss of earnings: This shall include lost earnings from employment, lost time from work, and loss of earning capacity up until the time of trial. This includes a reduction in earnings which the Plaintiff would have earned but for the injury.

(c) Future lost earnings or loss of earning capacity: This includes any loss of ability to earn money in the future. This includes the reduction in earning capacity which has been discussed by the Plaintiff and the Plaintiff's witnesses;

(d) Value of bodily injury and permanent impairment: The Plaintiff is entitled to the reasonable value of any bodily injuries sustained, including any permanent injury, disability, or impairment, and any loss of capacity to perform bodily functions, or to do daily activities, past and future;

(e) The reasonable value of the Plaintiff's pain, suffering, mental anguish, inconvenience, discomfort, and loss of capacity for the enjoyment of life.

Hasselden v. Atlantic Coast Line, 53 S.E.2d 60 (S.C. 1949); *Oliver v. Blakeney*, 137 S.E.2d 772 (1964); *Watson v. Wilkinson Trucking Co.*, 136 S.E.2d 286 (S.C. 1964); *McNeil v. U.S.*, 519 F.Supp. 283 (D.S.C. 1981) (Loss of Enjoyment); *Gasque v. Heuberlien, Inc.*, 315 S.E.2d 566 (S.C. Ct.App. 1984) (Permanency of injury, pain and

suffering, diminution of earning capacity, disfigurement, psychological trauma, alteration of lifestyle, and past and future medical care).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF’S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff’s Office,	)	
	)	
Defendants.	)	

Plaintiffs’ Request to Charge No. 10:

LOSSES AS A RESULT OF PERMANENT DISABILITY

The Plaintiff in this case has presented evidence relating to permanent injuries, limitations, and disabilities. Therefore, you must evaluate the future value of all of the Plaintiff’s losses resulting from the permanent injuries which were caused by the Defendant’s negligent conduct. In this regard, under South Carolina law, you may consider the Plaintiff’s remaining life expectancy for which he will be required to endure the permanent impairment. Under South Carolina law, at his current age of 50, the Plaintiff here is deemed to have a remaining life expectancy of 79 years.

S.C. Code §19-1-150 (1976 Code, as amended); *Fishburne v. Short*, 235 S.E.2d 118 (SC 1977); *Clifford v. Southern Railroad Company*, 69 S.E. 513 (SC 1910).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	

Plaintiffs' Request to Charge No. 11:

PAIN AND SUFFERING

I further instruct you that pain, suffering, and mental anguish are very material elements of damages under South Carolina law. The Plaintiff is entitled to compensation not only for that pain and suffering which she has endured up until the time of this trial, but for that which you find he will suffer in the future. In considering the future pain and suffering, again, you may consider the Plaintiff's life expectancy to determine the extent of these damages. The amount of compensation to which the Plaintiff is entitled is a matter which is within your discretion. There is no yardstick in our law by which you are to value pain and suffering. This is a matter for your judgment. In evaluating the Plaintiff's pain and suffering, you may consider the extent of the Plaintiff's injuries, the type of treatment he has undergone, the limitations placed upon him, the time during which he has been required to suffer discomfort, and the extent and degree of the discomfort suffered. *Lipscomb v. Poole*, 147 S.E.2d 692 (1966); *Edwards v. Lawton*, 136 S.E.2d 708 (1964); *Long v. US*, 241 F. Supp. 286 (D.S.C. 1965); *Harper v. Bolton*, 124 S.E.2d 54 (1962).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	
	)	

Plaintiffs' Request to Charge No. 12:

DUTY TO PRESERVE EVIDENCE

A party has a duty to preserve evidence during litigation and at any time before the litigation when a party reasonably should know that the evidence may be relevant to anticipated litigation. *Stokes v. Spartanburg Reg'l Med. Ctr.*, 368 S.C. 515.

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF’S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff’s Office,	)	
	)	
Defendants.	)	

Plaintiffs’ Request to Charge No. 13:

SPOLIATION OF EVIDENCE

When a party fails to preserve material evidence for trial, it is for you to determine first whether the party had a duty to preserve the material evidence. If you find that the party had a duty to preserve material evidence, you must then determine whether the party has offered a satisfactory explanation for that failure. If you find the explanation unsatisfactory, you are permitted – but not required – to draw the inference that the evidence would have been unfavorable to that party. *Stokes v. Spartanburg Reg’l Med. Ctr.*, 368 S.C. 515.

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF’S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff’s Office,	)	
	)	
Defendants.	)	

Plaintiffs’ Request to Charge No. 14:

NONDELEGABLE DUTY

A Defendant may delegate a *duty* to an independent contractor to provide adequate medical care to inmates of the detention center, but if the independent contractor breaches that duty by acting negligently or improperly, the Defendant remains *liable* for that breach. It actually is the liability, not the duty, that is not delegable. The party which owes the nondelegable duty is liable for any negligent acts of the independent contractor.

Estelle v. Gamble, 429 U.S. 97, 104 (1976); *Simmons v. Tuomey Regional Medical Center*, 533 S.E.2d 312 (S.C. 2000); *see also* F. Patrick Hubbard & Robert L. Felix, *The South Carolina Law of Torts* 654 (1997).

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENWOOD	)	
	)	
Tony Young,	)	CASE NO. 2016-CP-24-00157
Plaintiff,	)	
	)	
v.	)	PLAINTIFF'S REQUESTS TO
	)	CHARGE
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	

Plaintiffs' Request to Charge No. 15:

SATISFACTION OF JUDGMENT

Under South Carolina law, whether or not the Defendant is protected from liability by insurance shall not be made known to the jury and should not be taken into consideration by the jury when reaching its decision. You should not engage in speculation on this issue. You are not allowed to consider whether the Defendant is or is not insured against liability, or whether the Defendant will satisfy any judgment out of its own funds.

S.C. R. Evid. 411; *Dunn v. Charleston Coca-Cola Bottling Co.*, 311 S.C. 43, 426 S.E.2d 756 (1993); *Sarvis v. Register*, 288 S.C. 236, 341 S.E.2d 791 (1986).

STATE OF SOUTH CAROLINA	)	
COUNTY OF GREENWOOD	)	IN THE COURT OF COMMON PLEAS
	)	
Tony Young,	)	
Plaintiff,	)	CASE NO. 2016-CP-24-00157
	)	
v.	)	
	)	VERDICT FORM
Greenwood County Detention Center and the	)	
Greenwood County Sheriff's Office,	)	
	)	
Defendants.	)	
	)	

We, the jury, unanimously find as follows:

1. In regard to the claim of Tony Young against the Greenwood County Sheriff's Office for gross negligence, we find for:

_____ **Plaintiff Tony Young**

_____ **Defendant Greenwood County Sheriff's Office**

If you found for Plaintiff Tony Young in Question 1, proceed to Question 2. If you found for Defendant Greenwood County Sheriff's Office in Question 1, you have completed your deliberations regarding the claims of Tony Young, and your Foreperson should sign and date the Verdict Form.

2. In regard to the claim in which we found for Plaintiff Tony Young against Defendant Greenwood County Sheriff's Office, we award damages to Plaintiff Tony Young in the amount of \$ _____.

Proceed to Question 3.

3. Having been charged on the law of occurrences, state the number of occurrences that are supported by the facts and evidence in this case. _____

The Foreperson, acting on behalf of the unanimous jury, must sign and date this form below.

DATE

FOREPERSON

Certificate of Counsel

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

May 7, 2020

s/ Joshua T. Hawkins

Joshua T. Hawkins, S.C. Bar #78470
Helena L. Jedziniak, S.C. Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
(864) 275-8142 (telephone)
(864) 752-0911 (facsimile)
josh@hjllesc.com
helena@hjllesc.com

RECEIVED

May 26 2020

SC Court of Appeals

Kyle J. White, S.C. Bar # 101426
White, Davis and White Law Firm
209 E. Calhoun St.
Anderson, South Carolina 29621
(864) 231-8090 (telephone)
(864) 231-8006 (facsimile)
kyle@wdwlawfirm.com

Attorneys for the Appellant