

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
In the Court of Common Pleas for the Ninth Circuit

The Honorable Maite Murphy, Circuit Court Judge

Appellate Case No. 2019-000671

RECEIVED
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SC Court of Appeals

Tammy C. Richardson Respondent,

v.

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

Of whom McCabe, Trotter & Beverly, P.C. is the Appellant.

RECORD ON APPEAL – VOLUME 3 OF 3

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

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February 7, 2020

BARNWELL WHALEY PATTERSON &
HELMS, LLC

By: 

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

EXHIBIT 2

**STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER**

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

TAMMY C. RICHARDSON,

PLAINTIFF,

v.

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

DEFENDANTS.

**PLAINTIFF'S NOTICE OF
VIDEOTAPED DEPOSITION OF
SHERI SELF**

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

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

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

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

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

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

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**ATTORNEYS FOR TAMMY C.
RICHARDSON**

Charleston, S.C.
November 13, 2018

CERTIFICATE OF SERVICE

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

Signed: _____



EXHIBIT 3

**STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER**

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

TAMMY C. RICHARDSON,

PLAINTIFF,

v.

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

DEFENDANTS.

**PLAINTIFF'S NOTICE OF
VIDEOTAPED DEPOSITION OF
HAYLEN GATLING**

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

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

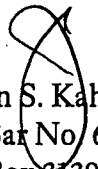
Name of Witness:	Haylen Gatling
Time and Date:	10:00 a.m., January 15, 2019
Place:	Rogers Townsend & Thomas, PC 1221 Main Street, 14 th Floor Columbia, SC 29202

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

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

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

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**ATTORNEYS FOR TAMMY C.
RICHARDSON**

Charleston, S.C.
November 9, 2018

CERTIFICATE OF SERVICE

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

Signed: _____



STATE OF SOUTH CAROLINA

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF RICHLAND

Tammy C. Richardson, Plaintiff

v.

SUBPOENA IN A CIVIL CASE

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

Case Number: 2016-CP-18-1001

Pending in Dorchester County

TO: Haylen Gatling c/o Andrew Countryman, Esq., Countryman Law Firm, 321 Wingo Way, Ste. 102, Mt. Pleasant, SC

☐ YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME , AM

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

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

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

See accompanying Deposition Notice for documents requested to be produced.

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

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

PREMISES	DATE AND TIME , AM
----------	--------------------

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

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

November 9, 2018

Justin S. Kahn

Attorney/Issuing Officer's Signature

Date

Print Name

Indicate if Attorney for Plaintiff or Defendant

Attorney's Address and Telephone Number :

Justin S. Kahn, SC Bar 65100, Attorney for Plaintiff, Kahn Law Firm, LLP, POB 31397, Charleston, SC 29417, p: 843.577.2128, F: 843.577.3538

Clerk of Court/Issuing Officer's Signature

Date

Print Name

Pro Se Litigant's Name, Address and Telephone Number :

PROOF OF SERVICE

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

DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on 11/9/18SIGNATURE OF SERVER [Signature]ADDRESS OF SERVER Box 31397, Ches, SC 29417

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

(c) Protection of Persons Subject to Subpoenas.

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

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

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

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

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

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

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

(iv) subjects a person to undue burden.

(B) If a subpoena:

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

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

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

(d) Duties in Responding to Subpoena.

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

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

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

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

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

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

EXHIBIT 4

COUNTRYMAN LAW FIRM

LITIGATION ♦ MEDIATION

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

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

November 14, 2018

Via Email Only

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

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

Dear Justin:

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

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

Sincerely,



Andrew W. Countryman

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

ELECTRONICALLY FILED - 2019 Mar 01 1:48 PM - DORCHESTER - COMMON PLEAS - CASE#2016CP1801001

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

Please see the attached letter.

Andy
 Andrew Countryman
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 Mount Pleasant, SC 29464
 843-253-4477
awc@countrymanlawfirm.com
 *Certified South Carolina Circuit Court Mediator

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 843.253.4477 office
 844.644.3165 fax

November 14, 2018

Via Email Only

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

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

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

Sincerely,



Andrew W. Countryman

AWC/sgc

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

EXHIBIT 5

ELECTRONICALLY FILED - 2019 Mar 01 1:48 PM - DORCHESTER - COMMON PLEAS - CASE#2016CP1801001

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

Documents and Beginning Bates
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MTB Supp. 008850
MTB Supp. 008930
MTB Supp. 008938
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EXHIBIT 6

COUNTRYMAN LAW FIRM

Litigation ♦ Mediation

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Mount Pleasant, South Carolina 29464
*Certified S.C. Circuit Court Mediator

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www.countrymanlawfirm.com
843-253-4477 office
844-644-3165 fax

January 15, 2019

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

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

Dear Justin:

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

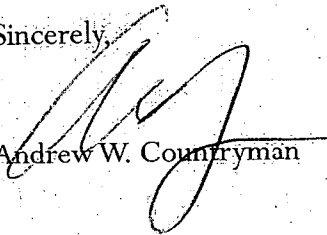
The parties have exchanged tens of thousands of documents in discovery in this case. You noticed these depositions (by agreement) on November 9, 2018. I sent you a letter on November 14th regarding identification of documents and Rule 30(j)(8). You then sent a bizarre email December 13, 2018, demanding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

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

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

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

Sincerely,



Andrew W. Counfryman

AWC/sgc

cc: Robert Wood, Pattie Michel, Sammie Arnold

EXHIBIT 7

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

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From: [Murphy, Maite Law Clerk \(Chandler D. Rowh\)](#)
To: iskahn@kahnlawfirm.com; sammie@maryarnoldlaw.com; [Andrew Countryman](#)
Subject: Tammy Richardson v. Halycon Real Estate Svcs. - 2016-CP-18-1001 - March 4th Motions
Date: Thursday, March 28, 2019 10:29:41 AM

Good Morning,

On March 4th, several motions from the above-referenced case were heard by Judge Murphy. At this point, I believe the only motions which are still under advisement are as follows: (1) Plaintiffs' Motion for Sanctions; (2) McCabe Trotter's Motion for Protective Order (Sherri Self); and (3) McCabe Trotter's Motion for Protective Order (Haylen Gatling). If I am mistaken as to this, please let me know as soon as possible.

After reviewing the deposition in its entirety, Plaintiff's Motion for Sanctions is Granted for the precise reasons stated in Plaintiffs' memorandum, and the relief sought and listed on page three of Plaintiffs' memorandum is ordered in its entirety. In addition, attorney fees incurred for both the previous depositions and the future, subsequent depositions shall also be awarded to Plaintiffs. For the same reasons, both of McCabe Trotter's Motions for Protective Order are denied in their entirety. Mr. Kahn and Ms. Arnold, when you get a chance, please prepare an order(s) noting these rulings, and submit them through the E-filing system for Judge Murphy's review.

Best,

Chandler

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**From:** [Andrew Countryman](#)  
**To:** [Murphy, Maite Law Clerk \(Chandler D. Rowh\)](#)  
**Cc:** [jskahn@kahnlawfirm.com](mailto:jskahn@kahnlawfirm.com); [sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com); [Robert P. Wood](#)  
**Subject:** Re: Tammy Richardson v. Halycon Real Estate Svcs. - 2016-CP-18-1001 - March 4th Motions  
**Attachments:** [Disco Order.pdf](#)  
[Order.pdf](#)

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Chandler,

I am very disappointed to hear about this decision. I am not one to belabor a point. However, I also do not take a request for or an award of sanctions lightly and feel compelled to comment here. I have never had anyone contest that a lawyer for a witness is entitled to review material with the witness presented during a deposition if that material has not been specifically identified or produced ahead of time. I have always taken this position on both sides of it and produce/identify specific material I will use with a witness prior to a deposition. If I do not, I have always allowed the lawyer for the witness to briefly review the document(s) with the witness during the deposition. This is in the spirit of fairness and an effort to avoid surprise during a deposition. I cannot find any binding South Carolina case law discussing this element of the Rule. I believe this is because the spirit of the Rule is clear, and most other lawyers, in my experience, take this as a given.

I do want to bring the Court's attention to Orders in a South Carolina federal case dealing with the same issue and an almost identical Local Federal Rule (attached). Judge Joseph Anderson determined that the identification of 3,000 documents produced in discovery did not satisfy Local Rule 30.04(H), which is very similar to SCRCP 30(j)(8):

Deposing counsel shall provide to opposing counsel a copy of all documents to be shown to the witness during the deposition, either before the deposition begins or contemporaneously with the showing of each document to the witness. If the documents are provided (or otherwise identified) at least seven (7) days before the deposition, then the witness and the witness's counsel do not have the right to discuss the documents privately during the deposition. If the documents have not been so provided or identified, then counsel and the witness may have a reasonable amount of time to discuss the documents before the witness answers questions concerning the document.

Judge Anderson held that the voluminous identification of 3,000 documents did not fulfill the spirit of the Rule 30.04(H), and the discovery rules contemplate a deponent having a reasonable opportunity to review relevant documents that would be shown to her, with counsel, prior to a deposition. He went on to say that preparing, under the Rules, to be questioned on over 3,000 documents would be unworkable. Judge Anderson granted a request for protection with respect to questioning the witness regarding the substance of off the record discussions with her lawyer about the documents presented in the deposition.

That is the situation here, except the material at issue is in the tens of thousands (the parties have exchanged approximately 100,000 documents in discovery). A decision contrary to this reasoning not only impacts this case but could also have far reaching implications in many other civil cases across the State. An award of sanctions would also state or imply I acted with some nefarious intent. This is simply not the case. I have built an impeccable reputation since I began practicing in 2005 and always work in the spirit of fairness and within the Rules. That is also the situation here, as I went above and beyond to ask for the identification of the specific documents to be used in the depositions ahead of time, since referring to everything produced

in discovery gave me no ability to review the subject material with the witnesses.

I would ask Judge Murphy to consider this is in ruling on the subject Motions and reconsider awarding sanctions. I also ask whether I will have the opportunity to comment on any proposed Order Plaintiff submits.

Most respectfully,

Andy  
Andrew W. Countryman  
Countryman Law Firm  
321 Wingo Way, Suite 102  
Mount Pleasant, S.C. 29464  
843-253-4477  
[awc@countrymanlawfirm.com](mailto:awc@countrymanlawfirm.com)  
\*Certified S.C. Circuit Court Mediator

On Mar 28, 2019, at 10:29 AM, Murphy, Maite Law Clerk (Chandler D. Rowh)  
<[mmurphy1c@sccourts.org](mailto:mmurphy1c@sccourts.org)> wrote:

Good Morning,

On March 4<sup>th</sup>, several motions from the above-referenced case were heard by Judge Murphy. At this point, I believe the only motions which are still under advisement are as follows: (1) Plaintiffs' Motion for Sanctions; (2) McCabe Trotter's Motion for Protective Order (Sherri Self); and (3) McCabe Trotter's Motion for Protective Order (Haylen Gatling). If I am mistaken as to this, please let me know as soon as possible.

After reviewing the deposition in its entirety, Plaintiff's Motion for Sanctions is Granted for the precise reasons stated in Plaintiffs' memorandum, and the relief sought and listed on page three of Plaintiffs' memorandum is ordered in its entirety. In addition, attorney fees incurred for both the previous depositions and the future, subsequent depositions shall also be awarded to Plaintiffs. For the same reasons, both of McCabe Trotter's Motions for Protective Order are denied in their entirety. Mr. Kahn and Ms. Arnold, when you get a chance, please prepare an order(s) noting these rulings, and submit them through the E-filing system for Judge Murphy's review.

Best,

Chandler

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COUNTRYMAN LAW FIRM

Litigation ♦ Mediation

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*Certified S.C. Circuit Court Mediator

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April 1, 2019

Via Email and E-Filing

The Honorable Maite Murphy
P.O. Box 802
5200 E. Jim Bilton Blvd.
St. George, SC 29477
mmurphysc@sccourts.org
mmurphylc@sccourts.org

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

Dear Judge Murphy:

I represent Defendant McCabe, Trotter & Beverly, P.C. ("MTB") in this case pending in Dorchester County. I received a courtesy copy of Plaintiff's proposed Order on my Motions for Protective Order(s) and Plaintiff's Motion for Sanctions today. I respect but strongly disagree with the Court's decision to deny the Motions for Protective Order(s) and grant the Motion for Sanctions, and I take serious issue with the Proposed Order.

The crux of all three Motions is the meaning and application of SCRCP 30(j)(8) regarding the identification and provision of material to be shown to a witness during a deposition prior to it. I maintain that merely referring to tens of thousands of documents produced in discovery is insufficient under the Rule, therefore allowing a private discussion with the witness to briefly review documents used that were not specifically identified beforehand. I have never had anyone question this position until this case, and it has always been my understanding that the Rules apply to prevent surprise, not create it.

I can find no South Carolina case law on this specific issue, I believe, because it is self evident. I did find two Orders Judge Joseph Anderson issued in federal court on this same issue relating to a nearly identical federal rule (attached). He found the identification of or referral to thousands of documents produced in discovery did not identify material to be used in the witness' deposition sufficient to allow the witness or counsel to review it beforehand (which is the point of

the Rule). So, Judge Anderson held the witness and her lawyer were entitled to a private discussion regarding material presented during the deposition.

That is the same situation here, except we are dealing with approximately 100,000 documents. Identifying or referring to all that material, regardless of who produced it in discovery, does not in any manner give me the ability as the lawyer for the witness(es) to review material they will be shown in the deposition ahead of time. I made this position clear from the beginning and in writing multiple times.

Plaintiff's proposed Order does not reference Rule 30(j)(8) or explain its application. It only says I improperly stopped the depositions to discuss material with witnesses without any basis. This is untrue. Rule 30(j)(8) was my basis, and I referenced this on the record and in writing many times. I ask the Court to include a discussion of the Rule, including how it applies (or does not apply) to this specific situation, in any Order issued. Simply put, is it the Court's determination that referring to all material produced or identified in discovery as potential deposition fodder sufficient to comply with Rule 30(j)(8)?

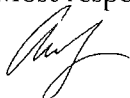
I also ask you to reconsider an award of sanctions. I most certainly did not, nor would I, act in bad faith or in knowing violation of any Rule. My interpretation of Rule 30(j)(8) differing from the Court's is one thing, but making this an issue of impropriety and bad faith is quite another. As I argued at the hearing and detailed in my briefing, Plaintiff's counsel's failure to identify material to be used in the deposition shows a clear intent to hide the ball and gain a tactical advantage- the very thing the Rules are designed to guard against.

Additionally, awarding sanctions as detailed in Plaintiff's proposed Order will equate to an approximately \$20,000 (or more) penalty. This would be grossly unfair and punitive. I also renew my request for reasonable time limitations on any reconvened depositions. As is apparent, these witnesses have already been deposed for many hours each. Plaintiff's proposed Order contains no restriction(s) whatsoever and gives Plaintiff a blank check at my client's expense. Plaintiff's counsel also has chosen to video every deposition and includes the associated costs as part of the sanction. This is inappropriate, and I ask the Court not to include it.

I am truly shocked and surprised by the Court's apparent punitive treatment of my attempts to protect my clients, under the Rules, from being surprised with documents during their depositions. I again ask the Court to reconsider its position on these issues. I also request a specific discussion in any Order of the application of Rule 30(j)(8), as well as reasonable limitations for any reconvened deposition(s) and costs the Court awards.

Thanks for your consideration.

Most respectfully,



Andrew W. Countryman

AWC/sgc

Attachments

cc (via mail): other counsel of record

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

Cheryl Hammond Hoskins, individually)
and as personal representative of the)
Estate of Thomas R. Hoskins,)

Plaintiff,)

vs.)

Sharon Snipes-King, Wheels, Inc., and)
Siemens Medical Solutions USA, Inc.,)

Defendants.)

C/A No. 3:08-2442-JFA

ORDER

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

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

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

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

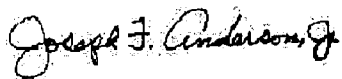
The court finds that in light of the voluminous number of documents identified for the

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

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

IT IS SO ORDERED.

July 6, 2009
Columbia, South Carolina



Joseph F. Anderson, Jr.
United States District Judge

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

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

This case is before the court on six (6) discovery motions. The court will address the motions in turn.

I. *Plaintiff's Motion To Prevent Discovery Of Insurance Proceeds, Death Benefits, And Other Collateral Source Benefits She Has Received [dkt. # 78]*

As this motion points out, defendant Sharon Snipes King sought information in written discovery as to collateral benefits plaintiff received as a result of her husband's death. Plaintiff objected to the discovery, and no motion to compel was ever filed. The issue arose instead at plaintiff's deposition. When defendant King's lawyer asked about such payments, plaintiff's counsel objected and instructed the plaintiff not to answer the question. This motion followed.

Rule 30(c)(2) of the Federal Rules of Civil Procedure provides that a person may instruct a deponent not to answer a question in a deposition only when necessary to preserve

a privilege, to enforce a limitation ordered by the court, or to present a motion to terminate or limit a deposition. The motion to terminate or limit the deposition is properly made on the ground that the deposition is being conducted in bad faith or in a manner that unreasonably annoys, embarrasses, or oppresses the deponent or party. Fed. R. Civ P. 30(d)(3)(A).

This discovery does not involve the application of a privilege, nor does it involve an area where the court has ordered that there be a limitation. Instead, plaintiff argues that because evidence of collateral benefits will not be admissible at trial, defendant King's questions regarding collateral source payments are needlessly oppressive, harassing, and intrusive.

The court disagrees. "Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense" Fed. R. Civ. P. 26(b)(1). "Relevant information need not be admissible at the trial if the discovery appears reasonably calculated to lead to the discovery of admissible evidence." *Id.* In this case, evidence of collateral payments to plaintiff could lead to the discovery of admissible impeachment evidence regarding plaintiff's financial condition. *See* 22 Am. Jur. 2d *Damages* § 763. There is no indication that the purpose of the question was to harass plaintiff. The court will therefore not make the jump of assigning that purpose to the question simply because the evidence might be inadmissible in the mine-run of cases.

This motion [dkt. # 78] is accordingly denied.

II. *Plaintiff's Motion To Exclude Dr. Oliver G. Wood, Jr. As An Expert*
[dkt. # 81]

Plaintiff requests that the court prevent Dr. Oliver G. Wood, Jr. from being offered as an expert in this case by the defendants. Plaintiff makes this request on the grounds that defendants have failed to provide plaintiff with a report from Dr. Wood which sets forth Dr. Wood's opinions and the bases for them. To counter, defendants offer that Dr. Wood has not been able to prepare a final report due to plaintiff's refusal to provide defendants with certain categories of specific information. In support of this contention, defendants point the court to their motion requesting that the court compel plaintiff to provide them with discovery responses related to this issue. This motion was filed after the deadline for providing an expert's report.

The motion to exclude Dr. Wood's testimony is denied. The court is cognizant of the fact that the parties delayed much of the formal discovery in this case while they explored settlement negotiations. Throughout the life of this case, it appears that plaintiff has provided defendants with detailed information which an economic loss expert would use in preparing expert testimony. But it also appears that defendants were not provided with all of the information that such an expert might require or that their expert requested. The motion to compel that the defendants referenced in their response has since been resolved. *See* [dkt. # 110]. The court therefore expects that defendants will provide plaintiff with Dr. Wood's final report as soon as possible, if they have not done so already.

This motion [dkt. # 81] is accordingly denied.

III & IV. *Motions Relating To Siemens' Potential Liability* [dkt. #'s 83 & 87]

The parties have competing motions on this issue. The gist of the dispute is that plaintiff seeks a great deal of information regarding, in general, defendant Siemens' practices and procedures for monitoring employee compliance with company policies on the use of company automobiles. The requested information includes information about Siemens' enforcement of its company policies and training Siemens may have provided to its employees. Plaintiff is seeking information she believes will support claims of both direct and vicarious liability against Siemens for the accident at issue. Siemens contends that there is no basis in law for its direct liability and no reasonable basis, on the facts of this case, for its vicarious liability.

The court finds that ruling on these motions may be premature at this time. The court instead directs that the briefing on Siemens' motion for summary judgment should proceed according to the current schedule. *See* [dkt. # 84]. Should the court determine that additional discovery is needed from Siemens, the court may order that discovery be reopened on that limited issue.

The court accordingly holds these motions [dkt. #'s 83 & 87] under advisement. The court will consider these arguments in conjunction with Siemens' motion for summary judgment as soon as that motion is ripe for a ruling.

V. *Plaintiff's Motion To Compel Answers To Requests To Admit Regarding Punitive Damages/Economic Bankruptcy And Facts Of The Accident At Issue* [dkt. # 101].

In this motion, plaintiff requests that the court compel the defendants to respond fully to several requests to admit. The court will take them in turn.

Request to admit number 1 appears fully and completely responded to.

Requests to admit numbers 2 through 7 fall in together. These requests to admit seek information regarding the defendants' abilities to satisfy a verdict of several million dollars. Plaintiff seeks this information on the grounds that a defendant's ability to pay is a factor for consideration in determining whether to award punitive damages and to what extent. Defendants object to the requests on the grounds that they are vague, may violate the rule prohibiting evidence of liability insurance, lack foundation, and are irrelevant. Defendants semantic objections are that no one "satisfies" a "verdict"—a jury renders a verdict and the court issues a "judgment" which may then be satisfied. Defendants also contends that it is not possible to know how to answer a request to admit directed to "defendant" when there are two defendants. This despite the fact that the requests to admit asked "each Defendant" to make a response. [dkt. # 101-2, p.1]

Punitive damages may be an issue in this case, ability to pay appears to be a proper issue in determining punitive damages, and there has been no showing that this discovery is sought to oppress or harass. The defendants should provide full and complete answers to requests to admit number 2 through 7. As providing these answers would not seem to impose

a substantial hardship to Siemens, the court sees no reason why Siemens should not go ahead and provide this information despite its holding of the other matters related to Siemens' discovery in abeyance.

The court takes this opportunity to advise the parties that its practice at trial is to limit this type of evidence to the net worth of each defendant. Accordingly, the only economic evidence related to the defendants that the court would allow at the punitive damages phase of a trial in this case would be that defendant King's net worth is \$xx, and that Siemens' net worth is \$yy.

Requests to admit numbers 8 and 9 appear to have been fully and completely responded to.

This motion [dkt. # 101] is accordingly granted in part and denied in part.

VI. *Defendant King's Request For Protection Arising Out Of Her Deposition*
[dkt. # 107]

In this motion, defendant King requests that the court prevent inquiry by plaintiff's counsel into the substance of off-the-record conferences between her and her counsel during her deposition. King also requests that the court protect her from answering plaintiff's counsel's question as to why King recently amended the answer she filed in this case to admit simple negligence.

The court previously dealt with the issue of intra-deposition document review in this case. That order came about due to the voluminous number of documents plaintiff sought, perhaps understandably, to review with King during her deposition. Plaintiff was entitled

to conduct a thorough deposition in accordance with the rules governing discovery, and the court's last order on this topic was an attempt to set a tone of modest accommodation that might carry over into the deposition. This attempt appears to have sadly failed. The court will not allow plaintiff to inquire into the subject of the off-the-record conferences between King and her attorney.

As to King's request for protection concerning the amendment of her answer, the contention is that the answer to that question would disclose privileged matters. There does not seem to be any dispute about this contention.

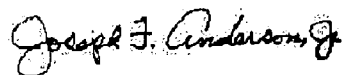
This motion [dkt. # 107] is accordingly granted.

VII. *Conclusion*

The motions are denied [dkt. #'s 78 & 81], taken under advisement [dkt. #'s 83 & 87], granted in part and denied in part [dkt. # 101], and granted [dkt. # 107]. The parties shall bear their own costs.

IT IS SO ORDERED.

August 6, 2009
Columbia, South Carolina



Joseph F. Anderson, Jr.
United States District Judge

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

COURT OF COMMON PLEAS

Case No. 16-CP-18-1001

Tammy C. Richardson,

Plaintiff,

v.

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

Defendants.

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

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

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

The specific grounds are:

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

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

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

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

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

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

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

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

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

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

April 15, 2019

s/ Robert P. Wood
 Robert P. Wood (6206)
 Rogers Townsend & Thomas, PC
 1221 Main Street, 14th Floor (29201)
 PO Box 100200
 Columbia, SC 29202
 (803) 771-7900
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Andrew W. Countryman
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 321 Wingo Way, Ste. 102
 Mt. Pleasant, SC 29464
 843-253-4477
 awc@countrymanlawfirm.com

Attorneys for Defendant McCabe, Trotter &
 Beverly, P.C.

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: *Richardson v. Halcyon Real Estate Services, LLC and McCabe, Trotter & Beverly, P.C.*

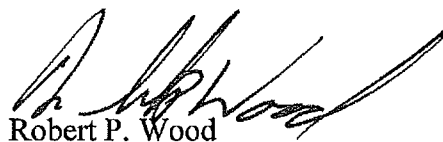
Dear Ms. Kitchings,

Enclosed for filing is a notice of appeal and motion to stay relief granted in the above case. Also enclosed are the following.

1. Proof of service of the notice of appeal on the respondent.
2. A copy of the order which is to be challenged on appeal.
3. A filing fee of \$300, \$250 for the notice of appeal filing fee and \$50 for the motion filing fee.

Please let me know if you have any questions or concerns.

Sincerely,



Robert P. Wood

Cc: The Honorable Maite Murphy
M. Dawes Cook, Esq.
Justin Kahn, Esq.
Mary Leigh Arnold, Esq.

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
IN THE COURT OF COMMON PLEAS
THE HONORABLE MAITE MURPHY
CIRCUIT COURT JUDGE

CASE NO. 2016-CP-18-1001

Tammy C. Richardson,

v.

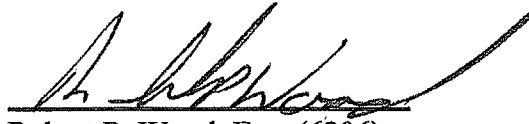
Halcyon Real Estate Services, LLP and
McCabe, Trotter & Beverly, P.C.

NOTICE OF APPEAL

McCabe, Trotter & Beverly, P.C. appeals the order of the Honorable Maite Murphy issued on April 4, 2109. Appellant timely filed a motion for reconsideration on April 15, 2019, which the court denied April 22, 2019. Appellant received written notice of entry of the underlying order on April 4, 2019 and of the order denying reconsideration on April 22, 2019.

April 22, 2019

(signature on next page)



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and

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Charleston, SC 29401
mdc@barnwell-whaley.com

Other Counsel of Record:

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Charleston, SC 29407
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Mary Leigh Arnold, Esq.
749 Johnnie Dodds Blvd #B
Mt Pleasant, SC 29464
sammie@maryarnoldlaw.com

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
IN THE COURT OF COMMON PLEAS
THE HONORABLE MAITE MURPHY
CIRCUIT COURT JUDGE

CASE NO. 2016-CP-18-1001

Tammy C. Richardson,

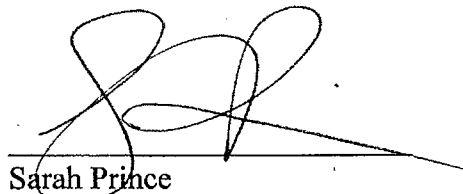
v.

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

PROOF OF SERVICE

I certify that I have served Tammy C. Richardson with a copy of the Notice of Appeal and Motion to Stay Depositions of Halyen Gatling and Stephanie Trotter and All Other Relief Granted by depositing a copy of it in the United States Mail, postage prepaid, on April 22, 2019, addressed to her attorneys of record, Justin Kahn, Esq., 562 Savannah Highway Charleston, SC 29407 and Mary Leigh Arnold, Esq., 749 Johnnie Dodds Blvd #B Mt Pleasant, SC 29464.

April 22, 2019



Sarah Prince

Paralegal to Robert P. Wood

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

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

TAMMY C. RICHARDSON,

PLAINTIFF,

v.

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

DEFENDANTS.

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

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

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

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

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

I. PRESCRIBED CONDUCT DURING DEPOSITIONS.

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

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

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

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

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

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

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

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

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

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

II. IMPROPER OBSTRUCTIVE BEHAVIOR OCCURRED DURING THE DEPOSITIONS.

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

5 **BY MR. KAHN:**

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

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

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

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

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

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

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

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

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

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

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

III. IMPROPER INSTRUCTION FOR DEPONENT TO LEAVE UNCONCLUDED DEPOSITION.

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

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

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

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

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

V. ORDERED RELIEF - SANCTIONS

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

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

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

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

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

AND IT IS SO ORDERED!

Maite Murphy
Judge, First Judicial Circuit

April __, 2019



Dorchester Common Pleas

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

So Ordered

s/ Maite Murphy 2166

Electronically signed on 2019-04-04 14:45:05 page 10 of 10

ROGERS TOWNSEND & THOMAS, PC OPERATING ACCT #1045
SC COURT OF APPEALS

04/22/19
539504

Property Address:

Borrower Name: Richardson, Tammy v. Halcyon Real Estate Services, LLC and McCabe Trotter

| <u>Date</u> | <u>Invoice</u> | <u>Invoice Amount</u> | <u>Amount Paid</u> |
|--|----------------|-----------------------|--------------------|
| 04/22/2019 | QC-4222019 | 250.00 | 250.00 |
| 019519.15 / sp2 / Filing of the Notice of Appeal | | | |

ROGERS TOWNSEND & THOMAS, PC

OPERATING ACCT #1045
PO BOX 100200
COLUMBIA, SC 29202-3200
(803) 771-7900

SOUTH STATE BANK

Columbia, SC
67-98/532

VOID AFTER 180 DAYS

DATE
04/22/19

AMOUNT
250.00

***** Two Hundred Fifty & no/100

PAY
TO THE
ORDER
OF

SC COURT OF APPEALS

ROGERS TOWNSEND & THOMAS, PC
OPERATING ACCT #1045

⑈ 539504 ⑈ ⑆ 053200983 ⑆ 1390001012 ⑈

ROGERS TOWNSEND & THOMAS, PC OPERATING ACCT #1045
SC COURT OF APPEALS

04/22/19
539504

Property Address:

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| <u>Date</u> | <u>Invoice</u> | <u>Invoice Amount</u> | <u>Amount Paid</u> |
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| 04/22/2019 | QC-4222019 | 250.00 | 250.00 |
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STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

COURT OF COMMON PLEAS
2016-CP-18-1001

Tammy C. Richardson,)

Plaintiff) TRANSCRIPT OF RECORD

-vs-)

) March 4, 2019

Halcyon Real Estate)

Services, LLC,)

) St. George, South Carolina

Defendant)

B E F O R E:

The Honorable Maite Murphy, Judge

A P P E A R A N C E S:

Justin S. Kahn, Esquire
Attorney for the Plaintiff

Mary Leigh Arnold, Esquire
Attorney for the Plaintiff

Andrew W. Countryman, Esquire
Attorney for the Defendant

Robert P. Wood, Esquire
Attorney for the Defendant

Reported By:

Yvestre Torres, OCR
Circuit Court Reporter for the
First Judicial Circuit

1 everything I wanted from the compel, absolutely, yes.

2 THE COURT: Okay.

3 MR. COUNTRYMAN: Your Honor, I believe the
4 next one is a motion for a protective order that I filed
5 related to the deposition of Haylen Gatling. It was
6 filed January 21, 2019. It primarily relates to Rule
7 30(j)(8) of the Rules of Civil Procedure. Ms. Gatling
8 is a McCabe Trotter employee. Plaintiff's counsel
9 noticed her deposition by agreement back in November of
10 2018, in addition to noticing the deposition of Theron
11 Coetzee, another McCabe Trotter employee.

12 In the deposition notice, Plaintiff's
13 counsel hadn't identified all material exchanged in
14 discovery under Rule 30(j)(8). Rule 30(j)(8) basically
15 says a lawyer taking a deposition has to give the other
16 side and the witness -- if they produce or identify the
17 documents they are going to use in the deposition two
18 days ahead of time, then the lawyer representing the
19 witness doesn't have the right to discuss the documents
20 with the witness. If the lawyer deposing the witness
21 does not produce or identify those documents that he's
22 going to use in the deposition two days ahead of time,
23 the lawyer for the witness has the right to briefly
24 discuss the documents privately with the witness.

25 In almost 14 years of practice, I have never

1 had anyone take issue with that. It's my common
2 practice to notify folks. Here's what we are going to
3 use. What's the reason? Well, to comply with the rules
4 and to prevent surprising the witness. And that's
5 especially important in this case where we have tens of
6 thousands of documents at issue. Identifying everything
7 that has been produced in discovery doesn't give any
8 clue whatsoever as to what material is going to be used
9 in the deposition.

10 So a couple of days after I received this
11 deposition notice, I wrote Mr. Kahn a letter discussing
12 that, and saying, I don't believe that your
13 identification of all documents that have been produced
14 in discovery is sufficient under the rule, and it
15 certainly gives me no idea whatsoever what you're going
16 to use with the witness. If you don't produce or
17 identify that stuff two days ahead of time, I reserve
18 the right to discuss material with her in the deposition
19 under Rule 30(j)(8). I did not get a response to that
20 letter.

21 I did receive the Friday before the Tuesday
22 deposition at 6:31 p.m. a 68-page spreadsheet from Mr.
23 Kahn identifying that as -- the spreadsheet listed a lot
24 of the class material. So this is additional material
25 we might use in the deposition. Well, the morning of

1 the deposition I discussed that with Mr. Kahn. I said,
2 Justin, that doesn't give me any idea of what you're
3 going to use with the witness. Please just give me the
4 documents now. I will go discuss them with her real
5 quick. I know you're not using 20,000 documents.
6 You have your box of exhibits. I'll go talk with her
7 about them right now, and we don't have to worry about
8 it. He refused to discuss it with me.

9 At lunch break for the deposition, we had
10 not used any substantive exhibits, and I again tried to
11 address it, and he wouldn't. I gave him another letter
12 saying, what you've done doesn't give any basis to know
13 what you're going to use with the witness. You're
14 trying to surprise the witness and prevent us from
15 knowing what you're going to use. That's not fair.
16 And so when he presented her with substantive exhibits,
17 I briefly broke the deposition to go discuss the
18 exhibits with her.

19 Once I did that initially, I believe he gave
20 me all the exhibits, and we went and discussed them for
21 about 15 or 20 minutes and then came back and the
22 deposition commenced. He asked her what we discussed,
23 and I objected and directed her not to answer on the
24 grounds of attorney-client privilege and cited Rule
25 30(j)(8).

1 So this is my motion for a protective order
2 under 30(d) based on my instruction to the witness not
3 to answer the question or questions asking what she and
4 I discussed during the breaks that we took under
5 30(j)(8).

6 MR. KAHN: Your Honor, I am going to hand
7 you a -- hand the Court a copy of In Re: Anonymous
8 Member of the Bar. I don't know if the Court is
9 familiar with this case or not. This is a case that
10 came out in 2001 which our Supreme Court set forth and
11 stated how one is to behave in depositions, and the
12 failure to do that will result in sanctions.

13 Mr. Countryman says that Rule 30(j)(8)
14 "basically says," or whatever it is he said. He takes
15 the unheard of position, unsupported by rule and
16 unsupported by case law, that an opposing attorney is
17 required to provide him exactly every document that one
18 plans on using in a deposition. That is not what the
19 rule is about, and it has never been about that.

20 In Re: Anonymous Member of the Bar, which
21 from what I recall, did not even cite to the Court,
22 which is directly on point, makes absolutely clear how
23 one is to behave in a deposition. Mr. Countryman has
24 mentioned that we have had multiple depositions in
25 different cases; we have. He has accused me of

1 inappropriate conduct. He filed a motion with Judge
2 Gergel in which when I handed a witness a document and
3 asked her to highlight the part of the document that
4 said they have to pay more than \$65. He instructed her
5 not to answer, filed a motion for protection, and said
6 I engaged in inappropriate conduct.

7 Judge Gergel -- I gave Judge Gergel a copy
8 of the video, and I have his order, in which he said
9 he didn't do anything wrong. She was being evasive.
10 You get to go back and take the deposition. So,
11 although I agree we have had our moments in depositions,
12 in the context of that, without any requirement to
13 providing the list, I gave him a list. He's upset about
14 that list. I came up with that list by doing OCR.
15 I took the initials of the person who generated these
16 thousands of letters. I used the name of the document
17 as they gave them to me and said, I might use some of
18 these that she created. These are documents they gave
19 me.

20 In addition to that, I identified documents
21 that have been used in depositions. What's the
22 surprise? If the witness doesn't know something, then
23 the witnesses can say that. What our Supreme Court has
24 made absolutely clear when it adopted these deposition
25 conduct rules is that the conduct Mr. Countryman has

1 engaged in is absolutely prohibited.

2 There are three motions before the Court
3 today. This is one of the protection. There's another
4 motion for protection, and then there's my motion for
5 sanctions. They all relate.

6 To give the Court an example of the kind of
7 conduct that took place, I noticed the deposition of a
8 witness, Ms. Sheri Self, who now lives in Macon,
9 Georgia. She's a former employee of McCabe Trotter.
10 He did not even identify -- at least I have not seen,
11 and I have searched -- he did not identify her as a
12 witness. That's okay. I saw her name -- her initials
13 in the documents, and in Ms. Trotter's deposition, she
14 identified her as a former employee who worked on this
15 lien team. I found her. She works for a law firm in
16 Georgia. I spoke with her. He suggested in his most
17 recent filing that that's an ethics violation. It's the
18 furthest thing from it. The rules absolutely authorize
19 a lawyer to speak with former employees. There's zero
20 problems with that. Zero. I have an obligation to do
21 that.

22 In fact, after I spoke with her, I then
23 communicated with her boss who is a lawyer, and he
24 wanted assurance from me, and the Court has a copy of
25 the letter, or at least part of it -- I can hand it up

1 to the Court -- that I am not going after his paralegal
2 or whatever she is. I said no problem. We are just
3 trying to see if we can set her deposition. She wants
4 me to talk to you; I am glad to do that.

5 I copied Mr. Countryman and Mr. Wood on that
6 e-mail to the lawyer in Georgia, and I said, this is to
7 make it clear we're not going after Sheri Self
8 individually. You have kindly offered to allow us to
9 use your office in Georgia and make her available.
10 I appreciate that. As you have requested, I am copying
11 Mr. Countryman and Mr. Wood on this. Here are their
12 phone numbers, here is the case, and we're not going
13 after her.

14 Shortly after that, I believe Mr. Countryman
15 got in touch with me and basically said don't talk to
16 her. Although the lawyer -- and this is part of my
17 motion to compel for sanctions -- I attached a letter
18 from the lawyer in Georgia saying, you can use our
19 office, we prefer to take her deposition during business
20 hours, but we're not holding you to that. If you need
21 to go longer, fine. Keep in mind this is a class-action
22 lawsuit, and this particular witness had generated
23 thousands of documents. It's in the context of that
24 that I want the Court to consider the following.

25 Although I do not think it's required in

1 order to avoid improper witness coaching, which has
2 taken place in this matter multiple times, I sent him a
3 list for her. When the deposition took place, and that
4 was more than this two-day thing that he comes up with
5 as a rule that I disagree with exists.

6 During that deposition when I handed her
7 documents with her initials, he stopped the deposition.
8 The Court will see quotes in my brief. One of the first
9 things I asked her was does he represent you, is he your
10 lawyer, and she said, he was not. He was not hired to
11 be her lawyer. I say things like this -- and really I
12 am setting up sort of long because I have to go through
13 In Re: Anonymous Member of the Bar first.

14 Our Supreme Court has said when you're in a
15 deposition, you are to treat it -- I have framed it as
16 if you can't do it in front of a judge, you shouldn't be
17 doing it in a deposition. That's my rule. That may be
18 how the judge framed it, but that's the concept.

19 So in light of that -- the Supreme Court has
20 outlined rules for a deposition in light of deposition
21 conduct rules. The Supreme Court has made clear there
22 are prohibited conduct during depositions which include
23 off-the-record discussions with the witness about
24 previously produced documents is prohibited. Absolutely
25 prohibited.

1 Mr. Countryman is not complaining that I
2 gave him documents that he had never seen before or that
3 were never identified. He is complaining I didn't
4 provide him with the exact documents that I might use
5 in the deposition. There's no rule that requires that.

6 The rules of discovery allow both sides to
7 know and exchange information. He cites a case, Samples
8 vs Mitchell, which has nothing to do with deposition
9 conduct. That sets forth a case in which the defense
10 lawyer failed to identify the existence of a videotape
11 of the Plaintiff waiving her arms around or hanging up
12 some clothes or something, and they tried to use the
13 videotape of that at trial.

14 The trial judge said, well, I know they
15 didn't identify it, but I'll let them use it without the
16 audio or something like that. It went up to the
17 appellate court and they said, no, no, no. When
18 somebody asks for something, if you're going to withhold
19 it, you better at least set forth what you're
20 withholding and set forth the basis of it but you can't
21 just not identify it. That's what Samples vs. Mitchell
22 holds. It has nothing to do with deposition conduct.
23 So that weaves into In Re: Anonymous Member of the Bar.

24 The Supreme Court outlined in such specific
25 terms the way things are to take place in depositions.

1 It says that, first of all, off-the-record deposition
2 conferences with a witness is absolutely prohibited,
3 unless you're trying to decide whether to assert a
4 privilege, or the document has never been produced or
5 identified. That is not the case here.

6 And it says before a conference like that
7 takes place, the lawyer has a responsibility to tell the
8 deposing lawyer what's about to happen. I'm going to go
9 meet with this witness, we're going to decide whether to
10 assert privilege over this document. That did not take
11 place. What he merely did was say, I am stopping this.
12 I'm going to go talk with her about the document, or
13 words to that effect, and I have the exact transcript in
14 my brief. So that step alone is an absolute violation
15 of deposition conduct.

16 Next, when one comes back if you're doing
17 that, you as the lawyer are to tell the other side what
18 has taken place so the lawyer can figure out what to do
19 with that. I am going to assert a privilege and here's
20 why or whatever it is. He refused to do that.
21 The deposing lawyer then gets to ask the witness what
22 did you all talk about. He instructed the witness not
23 to answer those questions. That's three different
24 violations before I even get into the other ones.

25 At one point, he asserted that the privilege

1 was not the witness's, it was his. That's in our brief.
2 I don't even know what that means, and he did not
3 explain it. That deposition where the lawyer in Georgia
4 kindly allowed us to use his office, I drove to Macon,
5 Georgia the night before, spent the night in a hotel,
6 we started the deposition around 10, 10:45, whatever it
7 was, where the witness agreed to that.

8 At three o'clock, after multiple
9 off-the-record conferences and witness coaching took
10 place, Mr. Countryman stands up and tells the witness
11 to leave and announces the deposition is over because
12 he has to get on the road. That is verbatim what took
13 place. I was not finished. This is a class-action
14 lawsuit. I had a box of documents to go through with
15 this witness. I have never seen anything like this.
16 The court reporter and videographer were like what is
17 this. I continued to talk on the record because I was
18 still marking things. He instructed the witness to get
19 up and leave, and I said, what's the basis of that?
20 And the exact language is in the brief, and the Court
21 will have it.

22 He then starts questioning the witness
23 about, well, don't we have a privilege, didn't I talk
24 with you? I am, like, hold on a second, Andy, you don't
25 get to ask questions if I haven't finished, and you're

1 telling her she's got to go. And he said, well, then
2 the deposition is over, and instructed her to leave.

3 I drove to Macon, Georgia for a deposition
4 of a critical witness, and for no reason he tells the
5 witness to leave. I have never seen anything like that
6 before. He is not even going to dispute that. That's
7 not because punches were being thrown in the deposition
8 or voices were raised. He just said he has to get on
9 the road. I don't even know what to do with that, and
10 I find it amazing that I'm even having to bring that up
11 to the Court.

12 So it's in the context of his motion for
13 protection I point out in my motion for sanctions he
14 didn't even cite In Re: Anonymous Member of the Bar,
15 which I find fascinating is the case on point. He has
16 not cited to this Court. He cannot cite in a rule
17 anything that says a lawyer must specifically identify
18 the documents to be used in a deposition. There is no
19 such rule. None. He's made that up. The only reason
20 I gave him a list at all was because we have had so much
21 difficulty in deposition.

22 The Court will see in our motion where
23 another example is -- I think it was Theron Coetzee.
24 During the deposition, after she testified -- I talked
25 to the Court about this packet of information. Oh,

1 it was Gatling. I can't remember which one; it's in my
2 brief. She's one of the members of the lien team.
3 There's a packet of eight or ten pages that they print
4 off. A couple of them are the notice of lien, and then
5 the rest are the right to cure letters that's never
6 signed by the lawyer. Her testimony was that the only
7 documents she gives the lawyer are the ones to sign,
8 not the others.

9 At some point in time, when he went out to
10 talk to the witness, on one of the 15 or 20 times, she
11 comes back and goes, and this is while -- I don't know
12 if she's here -- while Ms. Trotter, who is also a member
13 of the bar of this state, met with Mr. Countryman.
14 She was sitting in on this deposition. She comes back
15 and testifies, I misremembered, I really do give them
16 the whole packet, it's not just the top two pages.
17 And that's in for the Court to see. There was
18 absolutely witness coaching going on, which is
19 absolutely prohibited. It is outrageous. I have never
20 seen anything like this. I have practiced -- I have had
21 cases in Alaska, New York, Ohio, I am sure other states.
22 I have never seen anything like this. Certainly, in a
23 state where our Supreme Court has made it so absolutely
24 clear that this is prohibited.

25 It would be one thing, and I recognize it,

1 that the night before had I downloaded something off the
2 web and I saw something, and I said, look, Andy, here
3 you go. I might ask about that. He might be able to
4 talk -- he would be allowed to talk with her about that.
5 This is not that. These are documents they turned over
6 to us with their initials on them that they had
7 prepared. And every time the witness went out, he was
8 talking with her about it. And that absolutely infected
9 the process. In the words of G. Ross Anderson, it's the
10 equivalent of pouring urine into the milk, and I can't
11 unstrain that. How do you unstrain that?

12 It is with no pleasure that I'm standing
13 here doing this. The record absolutely speaks for
14 itself, and I encourage the Court to read the
15 transcripts that I have quoted. It's not even close.
16 For a lawyer to take the position that the exact
17 documents are required to be provided before he can meet
18 with a witness and not be able to cite a case or rule
19 that says that and then to do this in violation of In
20 Re: Anonymous Member of the Bar is -- this Court should
21 not sanction this.

22 One of the quotes I had in my brief was from
23 a Court in Washington State that said misconduct once
24 tolerated breeds more misconduct. If this Court allows
25 this kind of thing to take place, you're going to have

1 so many more motions. I have never had this happened.
2 I don't believe the Court -- my guess is the Court has
3 never seen anything like this. I couldn't even make
4 this up.

5 I -- again, if there was something going on
6 in the witness's life or Mr. Countryman's life where
7 they needed to take a break, whatever, but just to say
8 I have to get on the road and stop this deposition that
9 took me six months to schedule. I had permission to
10 give this deposition going in June or July of last year.
11 They didn't make it happen until January. I can't
12 figure out what the delay was. There was absolute
13 witness coaching.

14 In the quotes you will see, during
15 deposition, Mr. Countryman starts objecting
16 inappropriately. I don't know if the Court has read In
17 Re Anonymous Member or not. This Court -- the Supreme
18 Court makes it absolutely clear that witness coaching
19 can take the form of objections which are telling the
20 witness how to answer. That took place, and I quote
21 multiple examples of it.

22 I have tried to learn to ignore some of that
23 that takes place. From time to time, a deposition seems
24 to get heated, and I try to ignore it. That means by no
25 way I am not -- I just try to let that slide when it

1 takes place, but this is -- I have asked for the
2 sanction to include striking their answer. How am I
3 supposed to go back and figure out what took place with
4 these witnesses? How am I going to learn what their
5 deposition testimony was going to be before he engaged
6 with witness coaching? How?

7 And I realize it's a severe sanction, and I
8 thought to myself how am I going to uphold it on appeal
9 if the Court gives it to me? And that's why I have
10 dumped all this stuff in here. I anticipate that if the
11 Court grants it, it will go up on appeal, and the
12 Supreme Court will look at it and go, this is exactly
13 what we have prohibited. It's not just one example.
14 I have checked off every example of what the Supreme
15 Court has said shall not take place, and he did it.
16 Every time.

17 There's no rule that says what he said.
18 The Court even said, only if a document has not been
19 identified or produced two days ahead of time. There's
20 no dispute that all documents had been produced more
21 than two days ahead of time, like I said, probably 98,
22 if not more, percent by them. One of the things I
23 thought he said in his reply brief -- well, first, he
24 suggested that I engaged in inappropriate conduct by
25 contacting a former employee. The rules do not prohibit

1 that; it's absolutely clear.

2 He suggested that it wouldn't be fair to the
3 witness because they may not know anything. Then say,
4 I don't know anything about this. There's nothing
5 unfair about that. I asked the witness, do you know
6 anything about this document? No. Sometimes it
7 happens, but later on after they see a few others,
8 they're like, oh, yeah. You remember that other
9 document? Now, I remember. There's nothing wrong with
10 that. But the repeated stops to the deposition, I mean
11 15 to 30 times, whatever the numbers are, in multiple
12 depositions, to engage in witness coaching, should not
13 be tolerated by this Court.

14 I'm under no obligation to produce to him an
15 exact list; he has not cited such a thing. Our Supreme
16 Court has made it absolutely clear. I am trying to
17 think of all the different kinds of relief I have
18 requested, but I don't make this motion lightly at all.
19 At all. But I don't know what else is supposed to
20 happen when the lawyer does this kind of thing and then
21 seeks protection from my alleged misconduct for not
22 giving him a list of the exact documents I'm going to
23 use.

24 I have been in car wreck cases. The other
25 side may have thousands of pages of medical records.

1 I don't expect the lawyer on the other side to say, I'm
2 going to do this. I'm supposed to prepare my client for
3 that. I don't get to stop the deposition and hand her
4 some page from some radiologist or whatever it is.
5 That's not what the rules allow. But I realize there
6 are times in litigation when lawyers can tussle. This
7 is way beyond that. And I don't know what else I'm
8 supposed to do..

9 I have -- it is with no pleasure that I
10 bring this to the Court's attention, but I don't know
11 what else I'm supposed to do. I have to protect all
12 those people, and when a volume of witness coaching has
13 taken place, I don't know how you unring that bell.

14 MS. ARNOLD: Judge, I will just add one
15 thing. Part of the relief we're asking are because of
16 what happens in interruption of the deposition, and the
17 witness is going out and speaking with the lawyer.
18 One particular case that was important was Ms. Gatling.
19 What we were trying to get at quite honestly is the
20 practice -- you'll remember the robo-signing that
21 occurred in the mortgage scenario and what goes on.
22 She already testified one way and then we took a break.
23 They went out and talked and all of a sudden that
24 testimony materially changed after she came back.

25 I don't know how you do unring the bell.

1 I agree. But is the cost of the deposition, to be
2 allowed to go back on these very issues, to depose the
3 witness again, and ask the witness what has occurred in
4 these conferences that are going on outside in the hall
5 and not on the record that should not be going on.

6 And there is no attorney-client privilege
7 because once they came and he had the conversations,
8 any privilege is gone, it's wiped out. So part of the
9 relief, again, is to continue the depositions, finish
10 the depositions, and at their expense. Thank you,
11 Your Honor.

12 THE COURT: Your response, Mr. Countryman.

13 MR. COUNTRYMAN: Am I responding to the
14 motion for sanction? It sounds like that's what he was
15 arguing.

16 THE COURT: I think they kind of blended
17 together, your motion for protection, and then he went
18 into the motion to compel and motion for sanctions,
19 so we can address both of those, if you would like.

20 MR. COUNTRYMAN: That's fine. I kind of
21 need to gather myself. That was difficult to listen to,
22 as I have my credentials and my ethics and my
23 professionalism questioned, which I really don't
24 appreciate. I have never had that happen in my almost
25 14-year career.

1 Discovery rules. The intent of the
2 discovery rules is to avoid surprise so that everyone
3 knows what's going on before trial. Mr. Kahn's tactics
4 of identifying and producing thousands and thousands
5 and thousands of documents is to create a needle in a
6 haystack situation and actually prevent me as the lawyer
7 from knowing what he is going to use with the witness in
8 the deposition, and that works to his advantage because
9 he could stick a document in her face and say, isn't
10 this what that says, and he uses that to get sound bite
11 and gotcha answers. And I have never had a lawyer have
12 this position.

13 I have always produced and identified the
14 material I am going to use as deposition exhibits ahead
15 of time, and if I don't, then the lawyer gets to talk to
16 the witness about it. That's what Rule 30(j)(8) says,
17 if the documents are provided or are otherwise
18 identified at least two business days before the
19 deposition, the witness and witness's lawyer do not have
20 the right to discuss them privately before the witness
21 answers questions about them. If the documents have not
22 been so provided or identified, then counsel and the
23 witness may have a reasonable amount of time to
24 privately discuss the documents before the witness
25 answers questions concerning the documents.

1 I believe in all of our cases we have had,
2 I have identified and produced documents before his
3 client's depositions. That's my practice. I have never
4 had another lawyer question that. I had a deposition in
5 the Plaintiff's case the other day, and they presented
6 my witness with a document, and said, oh, Andy, we
7 didn't give this to you. You can go talk to her about
8 it, and we go look at it for a minute, we come back,
9 and she answers about it. It's easy. That's how
10 lawyers here practice law.

11 In this situation, I knew that this was
12 coming so I sent him a letter two months, three months
13 before the deposition about this issue, saying, Justin,
14 if you don't provide this stuff to me ahead of time as
15 the rule does provide, I don't know what you're going to
16 use, and this is not going to allow the witness to
17 testify knowledgeably about the issues or the documents
18 you give her, and I'm going to reserve the right to
19 discuss them with her during the deposition. And,
20 again, I did that before Haylen Gatling's deposition the
21 morning of. I often do that.

22 I will work with other lawyers and take the
23 documents, say, let me go talk with her about these real
24 quick so we cannot interrupt the deposition. Every
25 other lawyer, except for Mr. Kahn, that I have ever been

1 in contact with here has said, yeah, go ahead, that's
2 how things work. The idea is to get the witness to
3 testify knowledgeably, not just surprise the witness.

4 There's no witness coaching going on.

5 I think if you actually look at the transcript and look
6 at the breaks that were taken, I believe there was only
7 one break from Ms. Gatling's deposition because I was
8 provided all the documents at once. The other
9 deposition, which is the subject of my motion for
10 protective order, Ms. Self, similarly I told Mr. Kahn
11 way ahead of time, hey, I need the actual stuff you're
12 going to use.

13 We did come up to Macon, Georgia for the
14 deposition. I have extended professional courtesy to
15 Mr. Kahn when he failed to have a Georgia court reporter
16 there to take the deposition. The deposition rules say
17 the officer that transcribes the deposition is supposed
18 to be the one that issues the oath so that person can
19 swear that the deponent testified truthfully.

20 When we found out it was going to take too
21 long to get a Georgia notary or court reporter, I waived
22 that. I said that's fine. We can go ahead with the
23 deposition. You have stuff that you want to use with
24 her as we have discussed numerous times. No, he won't
25 provide them. So when he sticks documents in front of

1 Ms. Self's face that, yes, she created, and, yes,
2 I produced them, she had not seen that stuff in five
3 or six years. She doesn't know what it is. She doesn't
4 have context. Maybe if she had seen it ahead of time
5 she could give him a real answer as to why the letter
6 lists a certain amount of attorney's fees and another
7 letter lists a different amount. But, no, without
8 seeing that, she is going to say, I agree with whatever
9 Mr. Kahn says, and that's his whole intent.

10 So to have my professionalism and ethics
11 questioned in that regard is frankly outrageous. And so
12 we did every time he presented Ms. Self with a document,
13 I took a very brief amount of time, and I listed it in
14 my brief in opposition to the motion for sanctions,
15 essentially one, two, to three minutes for every
16 deposition exhibit. I was not discussing anything
17 except let's look at the document. Okay. That's it.
18 But at any point, he could have given me the documents
19 during the deposition ahead of time, and we could have
20 avoided all of this.

21 So we broke for lunch at the deposition,
22 and I have now a three-month boy at home. My wife is my
23 assistant and takes care of my child at home. He was
24 two months old, does not sleep. Justin, I really need
25 to get on the road at a reasonable time. I already

1 spent a first night away from home, and the witness has
2 some work she needs to do this afternoon, can you give
3 me an idea of when you might be done? No. Refused to
4 give me any idea, refused to give me any of the
5 documents, and I did put on the record when we returned
6 from lunch that I needed to leave at three o'clock for
7 those two reasons. Mr. Kahn never agreed admittedly,
8 but he also would not discuss it, and he would not move
9 the deposition forward by allowing me to quickly discuss
10 the documents with the witness all at once. Instead,
11 we wasted an hour's time.

12 Now, again, Mr. Kahn did contact this
13 witness without disclosing it to me. After that,
14 I worked with him to set the deposition, and, yes, I met
15 with the witness to prepare her because I was her
16 lawyer. Mr. Kahn asked, did you retain Mr. Countryman?
17 She said, no. That's because she didn't pay me
18 separately; she didn't hire me. I asked her am I your
19 lawyer, did you understand that what we were discussing
20 was confidential? Of course, and that's what she said.

21 This is all an attempt -- I don't know if it
22 is to disparage my name, or to get another crack at this
23 witness, but it's frankly outrageous. And to state that
24 In Re Anonymous somehow applies to sanction me is
25 personally hurtful because I would never do anything to

1 step afoul of any rules.

2 In all my years of practice, Rule 30(j)(8)
3 means that lawyers tell the other side what they're
4 going to use in a deposition so the witness can testify
5 about it knowledgeably. They don't hide the ball, and
6 say, no, no, no, you produce that document. You created
7 it so, therefore, I don't have to tell you about it.
8 Rule 30(j)(8) clearly applies to this situation.

9 And as a matter of practicality and
10 reasonableness, I presented Ms. Self without a subpoena,
11 voluntarily, and I asked out of all reasonableness, and
12 we have gotten along fine before this, I need some
13 information here because of my family and because of the
14 witness. Throw me a bone, but no, we waste time because
15 he does not hire the right court reporter, and I waived
16 that. We wasted an inordinate amount of time because he
17 refuses to identify and produce the documents ahead of
18 time, and now he accuses me of wrongdoing and asks for
19 sanctions, one of the more difficult things I have had
20 to consider and deal with in my professional life, and
21 I frankly don't appreciate it.

22 And I have in my motion motions for
23 protective order, request for sanctions. I don't care
24 about that. I don't ask for sanctions against other
25 lawyers, especially not ones who I know and who

1 I practice with. So, I will leave that to Your Honor's
2 discretion.

3 I have asked for attorney's fees, etc.

4 I don't care about that, but my name needs to be clear,
5 and it needs to be clear for the record that I
6 absolutely did nothing wrong. I follow the rules,
7 and Mr. Kahn's actions demonstrate a clear attempt to
8 circumvent the rules for the purpose of surprising the
9 witness, preventing me from knowing what he's going to
10 use as exhibits with them, in spite of all the
11 concessions and professional courtesies I extended.

12 MR. KAHN: A couple of things he raised,
13 which has never come up. I understand if he has a
14 newborn but that never came up. Had he told me that,
15 we could have made a deal. He needs to leave early,
16 let's reschedule it. He didn't. He ended the
17 deposition. He has co-counsel. Why didn't he bring his
18 co-counsel? This thing about the child never came up
19 before. Ever. And we are all sitting in on that --
20 well, Mary Leigh Arnold was by phone.

21 He said he made the witness available.
22 I have attached Exhibit 4 to my motion. This is an
23 e-mail from Mr. Nelson, who is Ms. Self's boss, who said
24 thanks for the e-mail. I appreciated the e-mail -- and
25 this is from July 18th -- and in light of your

1 representation that she has no personal exposure, she
2 will not require a subpoena and will appear voluntarily
3 for a deposition at our office, and it goes on from
4 there, and it wasn't Mr. Countryman making her
5 available. He didn't even identify her as a witness.

6 Again, I am not making this lightly. He has
7 not cited a rule, and the Supreme Court doesn't make an
8 exception for requiring someone to identify every
9 document that you will use. It simply means that as
10 a lawyer you better have identified or produced the
11 documents at least two days ahead of time. It doesn't
12 say the documents to use in the deposition. There has
13 never been an interpretation like that.

14 My recollection is that his deposition
15 notices are the same way. I think he has only taken
16 one deposition of our client. I don't -- I don't know.
17 My recollection is he would say no before the deposition
18 started to some documents he might use. There's no
19 requirement for that.

20 So this is a made-up excuse, and he still
21 hasn't explained why even when I gave him a list he
22 complains I didn't go through it, but he ended the
23 deposition. You can't have it both ways.

24 Again, I request the Court to look through
25 the brief. We cite the deposition quotes verbatim.

1 I go through In Re: Anonymous Member of the Bar.
2 He has yet to cite to the Court a rule requiring the
3 exact production of documents. There is no such thing.
4 Thank you.

5 THE COURT: Well, obviously, these are
6 serious allegations on both sides, which I will take
7 the time to, obviously, review the record in full.
8 Obviously, discovery violations are something I take
9 very seriously and find quite distasteful. But,
10 obviously, I will take the matter under advisement
11 and notify you of the opinion.

12 MR. COUNTRYMAN: Thank you, Your Honor.

13 MR. KAHN: Thank you.

14 MS. ARNOLD: Judge, can I suggest as to the
15 discovery issues, I draft an order that I can then
16 exchange with Andy, and we can make sure we have a good
17 find so we're kind of working off the same sheet and
18 then submit it?

19 THE COURT: Perfect. Thank you.

20 MS. ARNOLD: Okay.

21 MR. KAHN: The only other thing. These are
22 the video. I don't know if the Court will review them
23 or not, but I at least want to make them part of the
24 record to the extent I need to, if it helps Judge
25 Gergel. I'm not suggesting the Court go through all

1 of them, but at least -- these are all the video
2 depositions that I took and mark as an exhibit.

3 THE COURT: If you want to mark those as
4 an exhibit, yeah. Do you have a copy, if I do need to
5 review them?

6 MR. KAHN: Sure. For whatever purpose, I'm
7 going to mark them as an exhibit for the extent the ---

8 THE COURT: I just don't want to maintain
9 control of them.

10 MR. KAHN: I understand. Well, these are
11 copies.

12 THE COURT: Okay.

13 MR. KAHN: So, I just want them to be in the
14 record to the extent it's necessary to have them in the
15 record.

16 (Whereupon, Plaintiff's Exhibit No. 1 was marked for
17 identification and entered into evidence.)

18 MR. COUNTRYMAN: Your Honor, I would ask
19 that if you're going to review videos, I don't know what
20 those are, I would ask that you review the whole video,
21 not just the segments or the specifics that he has
22 picked out.

23 THE COURT: Certainly.

24 MR. COUNTRYMAN: Thank you.

25 (End of Transcript of Record)

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
In the Court of Common Pleas for the Ninth Circuit

The Honorable Maite Murphy, Circuit Court Judge

Appellate Case No. 2019-000671

Tammy C. Richardson Respondent,

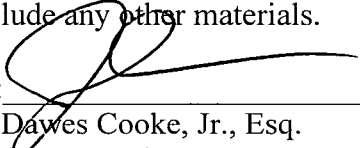
v.

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

Of whom McCabe, Trotter & Beverly, P.C. is the Appellant.

CERTIFICATE OF COMPLIANCE

The undersigned certifies that this Record on Appeal contains all materials proposed by the parties to be included in the Record on Appeal and does not include any other materials.

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