Transcript of **Shadell Hughes**

Date: October 28, 2016

Case: Carney, et al. -v- Osprey/Pantops Place, LLC, et al.

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ARBITRATION PURSUANT TO AGREEMENT OF PARTIES

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JACQUELINE CARNEY, as :
executrix of the estate of :
Diane Franklin, deceased, : McCammon Group Case
Plaintiff, : No.: 2016000286
v. :
OSPREY/PANTOPS PLACE, LLC, :
T/A COMMONWEALTH SENIOR :
LIVING AT CHARLOTTESVILLE, :
et al., :
Defendants. :

----------x

VIDEOTAPED DEPOSITION OF SHADELL HUGHES

Charlottesville, Virginia

Friday, October 28, 2016

10:12 a.m.

Job No. 125532

Pages: 1 - 52

Reported by: Kimberly L. Ribaric, RPR, CCR

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Deposition of SHADELL HUGHES, held at the law office of:

WILLIAMS MULLEN
321 East Main Street, Suite 400
Charlottesville, VA 22902
434-951-5700

Pursuant to agreement, before KIMBERLY L. RIBARIC, Registered Professional Reporter, Certified Court Reporter and Notary Public in and for the Commonwealth of Virginia at large.

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:
CHARLES A. GAVIN, ESQUIRE
CAWTHORN, PICARD, ROWE, DESKEVICH & GAVIN, P.C.
1409 Eastridge Road
Richmond, VA 23229
804-288-7999

ON BEHALF OF THE DEFENDANTS:
BENJAMIN W. PACE, ESQUIRE
WILLIAMS MULLEN
Two James Center
1021 East Cary Street
Richmond, VA 23218
804-420-6507

ALSO PRESENT:
Ashley Showalter, Commonwealth Assisted Living
Dana Campbell, Videographer

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C O N T E N T S

EXAMINATION OF SHADELL HUGHES PAGE
Examination By Mr. Gavin 8
Examination By Mr. Pace 37

E X H I B I T S

(NONE OFFERED.)

5

1 (October 28, 2016, 10:12 a.m.)
2 P R O C E E D I N G S
3 - - -
4 THE VIDEOGRAPHER: We're going on record.
5 The time is 10:12:44. Here begins Tape Number 1 in
6 the videotaped deposition of Shadell Hughes in the
7 matter of Jacqueline Carney, as executrix of the
8 estate of Diane Franklin, deceased, versus
9 Osprey/Pantops Place, LLC, T/A Commonwealth Senior
10 Living at Charlottesville, et al. This is an
11 arbitration pursuant to agreement of parties,
12 McCammon Group Case Number 2016000286.
13 Today's date is October 28, 2016. The
14 time on the video monitor is 10:13:25.
15 The videographer today is Dana Campbell,
16 representing Planet Depos.
17 This video deposition is taking place at
18 Williams Mullen, 321 East Main Street, Suite 400,
19 Charlottesville, Virginia.
20 Will counsel please voice identify
21 themselves and state they you represent.
22 MR. GAVIN: Chuck Gavin on behalf of the

6

1 Plaintiff.
2 MR. PACE: Ben Pace on behalf of the
3 Defendants.
4 THE VIDEOGRAPHER: Others present please
5 identify yourself.
6 MS. SHOWALTER: Ashley Showalter,
7 Commonwealth Assisted Living.
8 THE VIDEOGRAPHER: The court reporter
9 today is Kim Ribaric of Planet Depos. Would the
10 court reporter please swear in the witness.
11 - - -
12 SHADELL HUGHES,
13 WAS SWORN AND TESTIFIED AS FOLLOWS.
14 - - -
15 MR. GAVIN: Good morning.
16 THE WITNESS: Good morning.
17 MR. GAVIN: Shadell, I'm Chuck Gavin, I'm
18 an attorney, I represent Jackie Carney, who's the
19 daughter of Ms. Franklin, who you knew.
20 I know you said when you came in that
21 you've never given a deposition before.
22 THE WITNESS: No.

7

1 MR. GAVIN: So I know this is a little
2 intimidating, this setting with the camera and
3 everything, so I just wanted to go over a couple
4 ground rules with you.
5 And one is if you don't understand one of
6 my questions, just let me know and I will re-ask the
7 question, try to be more clear.
8 Second thing is you can't do a shake like
9 you just did of your head.
10 THE WITNESS: Sorry.
11 MR. GAVIN: You have to provide a verbal
12 response so she can take it down.
13 The next thing is that you're under oath,
14 which means that you're swearing to tell the truth.
15 Now, I know that we spoke a long time ago
16 generally about the case. And I know that you've
17 spoken to Mr. Pace. And then we spoke again this
18 past week about your testimony. And then I know
19 you've spoken to Mr. Pace again this morning.
20 So I just want to be clear that -- I
21 mean, do you believe that I have threatened you or
22 intimidated you to get your testimony one particular

8

1 way or the other?
2 THE WITNESS: No.
3 MR. GAVIN: And do you believe that
4 Mr. Pace's side has done that?
5 THE WITNESS: No.
6 MR. GAVIN: All right. So when we said
7 we just want you to tell the truth, you understand
8 what the truth is, right?
9 THE WITNESS: Yes.
10 MR. GAVIN: All right. And I think the
11 other day I just wanted you to tell the blunt truth
12 to the best of your recollection; is that correct?
13 THE WITNESS: Yes.
14 MR. GAVIN: And you're prepared to do
15 that today?
16 THE WITNESS: Yes.
17 MR. GAVIN: Okay.
18 - - -
19 EXAMINATION
20 BY MR. GAVIN:
21 Q. When did you start working for
22 Commonwealth Senior Living?

9

1 **A. I believe it was March of 2015 or 2014.**
2 Q. Okay. And what was your role when you
3 were hired?
4 **A. I was front desk.**
5 Q. What was your job duty at the front desk?
6 **A. I did night shift. So the night shift**
7 **duty was basically just to handle any, like, things**
8 **they had left for us to handle, such as sending**
9 **e-mails or faxes, or tidying up, making sure that the**
10 **residents had coffee, tea, like, everything for them**
11 **in the morning. That was basically it. Checking --**
12 Q. When you say -- and I didn't mean to talk
13 over you.
14 **A. Oh, sorry.**
15 Q. When say the "night shift," is that the
16 1:00 a.m. to 9:00 a.m. shift -- 9:00 --
17 **A. That's the shift I primary worked,**
18 **correct.**
19 Q. Okay.
20 **A. I would do the 5:00 to 1:00, and sometimes**
21 **I did a couple of days.**
22 Q. Okay. But primarily you were the --

10

1 **A. The night.**
2 Q. -- the midnight shift?
3 **A. Yeah.**
4 Q. Okay. And while you're doing the midnight
5 shift, we'll talk about this later, as I understand,
6 there were shift reports that were utilized by the
7 receptionist?
8 **A. Correct.**
9 Q. And when you did the shift reports, was it
10 an obligation between the different receptionists to
11 pass on any outstanding issues that may be the result
12 of the prior shift?
13 **A. Yeah. Like, if something happened, like**
14 **if the fire alarm was to go off or something really**
15 **super important that the next shift needed to know**
16 **about, we would just write it in, and if we saw the**
17 **person crossing, let the person know, or just think**
18 **they will go to the binder and look.**
19 Q. Okay. And we'll talk about this later
20 too, but the call log that's at issue here --
21 **A. Uh-huh.**
22 Q. -- if a call log had a blank entry and for

11

1 a resident not checking in, would that be something
2 that you were required to pass on to the next shift,
3 or would have been passed on to you for the night
4 shift?
5 **A. No.**
6 Q. All right. What's your educational
7 background, Ms. Hughes?
8 **A. I did high school, some college, but**
9 **that's about it.**
10 Q. Where did you go to college?
11 **A. I did classes at Piedmont.**
12 Q. Did you get a degree there?
13 **A. No.**
14 Q. All right. So you got a high school
15 diploma?
16 **A. Uh-huh.**
17 Q. Did you have any specialized training
18 before going to Commonwealth Senior Living?
19 **A. Not really. I was in management before**
20 **that, so --**
21 Q. What was your first job out of high
22 school?

12

1 **A. My first job out of high school -- well,**
2 **in high school I worked at Big Lots. And then, like,**
3 **my first job out of high school was Belk and Massage**
4 **Envy.**
5 Q. Okay. And what did you do there?
6 **A. At Belk I was just salesperson, register**
7 **on the floor. Massage Envy, I started off as sales**
8 **associate and moved to assistant manager, then I**
9 **moved to clinic administrator.**
10 Q. All right. And from there you went to
11 Commonwealth Senior?
12 **A. There, I went to Commonwealth Senior**
13 **Living, and I also was working a job called Relax and**
14 **Rejuvenate, which was more -- in the spa setting as**
15 **well, except for it was more behind-the-scenes spa**
16 **setting.**
17 Q. Okay. When you started working at
18 Commonwealth, who did you report to?
19 **A. Tiffany and Monica.**
20 Q. And what was Tiffany's role to your
21 understanding?
22 **A. Tiffany was the officer manager of just,**

13

1 **like, the girls and us, and then Monica was overtop**
2 **of her.**
3 Q. All right. When you reported to someone
4 or you had a question, would you go to Tiffany or
5 would you go to Monica?
6 **A. I would go to Monica first.**
7 Q. Okay. Was Tiffany also working the front
8 desk?
9 **A. Yes.**
10 Q. Was she working the front desk with you
11 routinely or was it just when somebody was out?
12 **A. She worked the front desk more. Like, she**
13 **didn't work on the shifts I worked, per se, but,**
14 **like, during the day she would be on the front desk,**
15 **and then if the other girls were there, she would be**
16 **on the front desk with them, so they would be side by**
17 **side. She was kind of overbearing. So then, like,**
18 **once she got her own separate office, then she would**
19 **stay in her little separate cubicle.**
20 Q. All right. Did you know what she did in
21 her own separate cubicle?
22 **A. From what I understood, she would make**

14

1 **sure -- she would take care of deposits, and that's**
2 **all I -- she would mention is, I have to take care of**
3 **deposits, ordering stuff, and I don't know what else**
4 **she really did.**
5 Q. Okay. Now I'm going to jump ahead to what
6 I'm calling the program. And you may not have ever
7 seen the actual language in the document, but it was
8 called a check-in program. Are you familiar with
9 what I'm talking about?
10 **A. The call log?**
11 Q. Yes.
12 **A. Yes.**
13 Q. All right. What was your understanding of
14 what needed to be done with the call log?
15 **A. If we see the residents or if the**
16 **residents call or anything, we just mark off in the**
17 **call log that we saw them.**
18 Q. Okay.
19 **A. And --**
20 Q. Go ahead.
21 **A. And then from reading what I've read in**
22 **the directions, like, if they don't call by 10:30, we**

15

1 **just go -- we were supposed to knock on their doors.**
2 **Or if we didn't hear from them by 10:30, knock on**
3 **their doors, take the key, if they don't answer their**
4 **doors, take the key and go in.**
5 Q. All right. Who first told you about the
6 call log?
7 **A. I honestly -- I want to say it was**
8 **Tiffany, but I'm not a hundred percent.**
9 Q. When you were hired originally to work the
10 front desk, were you provided with any training on
11 the call log?
12 **A. Not to my knowledge. I don't remember.**
13 Q. All right. So you don't recall Tiffany at
14 any point sitting down with you saying, this is the
15 call log, this is important, this is what you gotta
16 do, and this is what -- the rules that you have to
17 follow?
18 **A. No. Like, with our training, what -- our**
19 **training was kind of simple. Like, we came in, we**
20 **filled out our new hire paperwork, she sent us in the**
21 **living room to fill out all of that information and**
22 **we brought the stock back to her, and then our**

16

1 **training was basically just watching her do stuff,**
2 **because they were like, you know, it's not really a**
3 **hard job, as long as you know how to send e-mails,**
4 **use the fax machine, use the phone, make coffee,**
5 **there's nothing else to really know.**
6 Q. All right. So Tiffany didn't stress the
7 importance of maintaining the logbook to you?
8 **A. In the beginning no.**
9 Q. All right. When did she start stressing
10 the importance of it to you if it wasn't in the
11 beginning?
12 **A. Once everything started changing around**
13 **and, like, rules became more strict, like after the**
14 **Diane Franklin incident, that's when it was stressed,**
15 **like, you have to do this, it has to be done by this**
16 **time, if you don't, these are the necessary steps you**
17 **need to take.**
18 **Up until the situation with Ms. Franklin,**
19 **it was not stressed that hard.**
20 **In the shift reports, they would say, hey,**
21 **make sure you guys are checking the call log. But it**
22 **wasn't something that was just like stern to say,**

17

1 **hey, you have to do this.**
2 Q. Okay. Now, when you say you got these
3 reminders to check in with the call log, was that
4 because there were blank entries or places in the
5 logbook that were not being completed?
6 **A. Probably so, yes.**
7 Q. All right. Do you remember
8 specifically whether or not there were blank entries?
9 MR. GAVIN: I keep saying "blank
10 entries," Ben.
11 BY MR. GAVIN:
12 Q. Whether there were places in the logbook
13 that did not have any writing?
14 **A. Yes.**
15 Q. And --
16 **A. There would be, you know, some days it**
17 **would be filled out, some days it wouldn't be filled**
18 **out.**
19 Q. All right. Was there a discussion between
20 Tiffany and anyone else on the staff about why these
21 weren't being completed?
22 **A. I wasn't really there when Tiffany was**

18

1 **there with the other staff, so I'm not for sure the**
2 **depth of her discussions with the other girls.**
3 Q. Okay. But when you worked the night
4 shift, you were able to see that there were blank
5 spots in the logbook?
6 **A. Correct.**
7 Q. Did you ever raise that as a question to
8 anyone else?
9 **A. No. It wasn't a question -- it didn't go**
10 **off on my radar because it wasn't something that**
11 **management had made something that I needed to, like,**
12 **look for and be wary of.**
13 Q. Okay. And where do you work now?
14 **A. I work at UVa.**
15 Q. Okay. What do you do there now?
16 **A. I am PFA, so I check in all patients and I**
17 **also do scheduling for them.**
18 Q. So tell me the process as you understood
19 your directions to be as to what you would do in the
20 event that you woke up in the morning and 10:30 had
21 passed and a resident had not called to check in.
22 **A. Some residents did not like to be**

19

1 **bothered, some residents didn't get up 'til late, so**
2 **it really didn't bother us or go off in our head. If**
3 **a resident hadn't checked in by 10:30, it would be,**
4 **oh, they're probably asleep, or, oh, that's so and**
5 **so, they don't ever come around until about**
6 **4 o'clock.**
7 **So before the Ms. Franklin incident, it**
8 **was just what I said. But after Ms. Franklin**
9 **incident, regardless if they wanted to be called or**
10 **not, we had to, like, make sure and call and go to**
11 **their rooms and knock and check and so on and so**
12 **forth.**
13 Q. So would it be the case then that if
14 somebody did not call by 10:30, you would not go to
15 the room and check on them?
16 **A. Correct.**
17 Q. Or you would not necessarily call their
18 room?
19 **A. Correct.**
20 Q. How often would that happen?
21 **A. I didn't work too many shifts during the**
22 **day, so maybe 20 or 30 percent of my -- the shifts I**

20

1 **worked during the day.**
2 Q. Okay. And out of the 20 or 30 percent of
3 the shifts that you worked during the day, do you
4 remember how many times that people would not have
5 been checked on?
6 **A. There was a lot, to be honest. Like, it**
7 **was -- like, if I worked during the day, other**
8 **things -- we did other things where we would just**
9 **mark them off in passing. But it wasn't something**
10 **that Tiffany or Monica would come to me and say,**
11 **Shadell, hey, let's look at the shift report, who**
12 **hasn't -- I mean, sorry, let's look at the call log,**
13 **who hasn't checked in, we need to go make sure we**
14 **check on these people. That wasn't the case.**
15 Q. So as far as you're concerned, it wasn't
16 really a safety operation, it was more of a
17 convenience operation, if you --
18 MR. PACE: Object to the form.
19 BY MR. GAVIN:
20 Q. Okay. If you can answer the question.
21 Was it something that you did as a
22 courtesy or did you believe that it was important for

21

1 the safety of a resident?
2 **A. Until the Ms. Franklin situation, I think**
3 **it was more of a courtesy or more of a, hey, this is**
4 **a friendly reminder, check on this person.**
5 **After the Ms. Franklin situation, it was**
6 **something that we had to do for the safety of the**
7 **residents.**
8 Q. Would there have been any reason for you
9 to not check in on someone by 3:00 or 4:00 in the
10 afternoon other than it just wasn't that big of a
11 deal?
12 **A. Probably no reason. Like, unless --**
13 **honestly, if they didn't check in, oh, they're out of**
14 **town. Because it was an independent living**
15 **community, people left -- they left all the time.**
16 **Some -- and their garage was under. So we didn't see**
17 **when people left all the time. So it was like, oh,**
18 **we haven't seen Ms. So-and-So today, so she's**
19 **probably out with her daughter, or she's out with**
20 **Bill or whomever.**
21 Q. Okay. So if you came on the night shift
22 and you saw that there were several blank spots on

22

1 the logbook for that day, no one would have told you,
2 hey, these people need to be accounted for, and you
3 would not have been concerned about that?
4 **A. Correct.**
5 Q. And you would not have notified the person
6 on the next shift, hey, we need to account for these
7 blank entries, because you weren't concerned about
8 that?
9 **A. Correct.**
10 Q. All right. Do you remember Diane Gentry
11 Ross?
12 **A. Yes.**
13 Q. What was her role?
14 **A. She was front desk, just like me.**
15 Q. All right. Well, do you remember when
16 Tiffany went out on maternity leave?
17 **A. Yes.**
18 Q. What was your understanding of Diane's
19 role when Tiffany went out on maternity leave?
20 **A. She was still front desk, except for she**
21 **was working Tiffany's shifts, and she would take over**
22 **the stuff that Tiffany -- take over stuff such as**

23

1 **ordering supplies, take over the making sure**
2 **residents were doing their deposits, just taking over**
3 **some of Tiffany's load until she got back.**
4 Q. Did you ever hear her being identified as
5 a manager?
6 **A. No.**
7 Q. Did you consider her to be a manager?
8 **A. No.**
9 Q. So you considered her essentially to still
10 be at the reception desk but just handling another
11 function?
12 **A. Correct.**
13 Q. All right. Did you ever hear -- overhear
14 a conversation where Tiffany and Monica or anybody
15 else in management was expressing concerns about
16 compliance with the call log?
17 **A. Not between them, no. If they would talk,**
18 **they would make sure they closed the door in the**
19 **office.**
20 Q. At any point did any manager come out in
21 the afternoon and say, the call log's not being done,
22 why aren't you guys checking on these people?

24

1 **A. No.**
2 Q. I have been produced some shift reports by
3 Mr. Pace, and they're in this book. There's a bunch
4 of stickers on this book, Shadell --
5 **A. Okay.**
6 Q. -- and that's because we've been in these
7 depositions before.
8 **A. Okay.**
9 Q. And I'm going to flip over to Tab 14 for
10 you.
11 All right. Are these the shift reports
12 that we're talking about?
13 **A. Yes.**
14 Q. All right. For purposes of the record,
15 it's the ongoing exhibit book, Tab 14, starting at
16 page 118.
17 These are the shift reports that the
18 receptionist would prepare?
19 **A. Correct.**
20 Q. Was one done for every day?
21 **A. Usually, yes.**
22 Q. Would there be a reason why ones were not

25

1 completed for a given day?
2 **A. Just if somebody forgot or got busy.**
3 Q. Did you ever receive any instruction from
4 anybody in management, whether Tiffany, Monica or
5 otherwise, that they were obligated to write in the
6 shift report whether someone was checked in or not
7 checked in for a given day under the logbook program?
8 **A. No. The only instructions we got is if**
9 **somebody told you that they were going to be out of**
10 **town, just make sure you write it in --**
11 Q. In the logbook?
12 **A. Make sure you write it in the logbook.**
13 **Can I move this (indicating)?**
14 Q. Yes.
15 **A. Okay. Sorry. Just make sure --**
16 THE VIDEOGRAPHER: You're fine.
17 THE WITNESS: I'm fine? Okay. I'm
18 sorry.
19 BY MR. GAVIN:
20 Q. That's okay.
21 **A. Just make sure you write it in the logbook**
22 **just so we'll know that, hey, if we don't see so and**

26

1 **so for two weeks, they're out of town, or they moved**
2 **with their daughter if they get any packages or mail,**
3 **so we can hold it back for them.**
4 Q. Did -- strike that.
5 Did anyone ever call you or complain to
6 you or to the front desk while you were there about
7 the compliance component or the program not being
8 carried out?
9 **A. No.**
10 Q. How many times can you recall that you
11 ever called someone in response to them not calling
12 by 10:30?
13 **A. Prior to the Ms. Franklin incident, not**
14 **many. After the Ms. Franklin incident, a lot.**
15 Q. Did you ever go to check on somebody's
16 apartment?
17 **A. No. I never had any, like, had to do**
18 **it --**
19 Q. All right.
20 **A. -- because they would pick up the phone.**
21 Q. You remember on December 10th -- or the,
22 I'm sorry, the 11th, which was a Saturday, you were

27

1 working when Ms. Franklin was still in her apartment?
2 **A. I didn't work that weekend.**
3 Q. Okay.
4 **A. I worked the days leading up. So I worked**
5 **that Thursday and Friday, but that Saturday and**
6 **Sunday I was off.**
7 Q. That's right. Crystal was working?
8 **A. Uh-huh.**
9 Q. Okay. On the Thursday that was -- and I'm
10 going to skip over to the logbook --
11 **A. Okay.**
12 Q. -- which for purposes of the record we
13 previously identified as Franklin 15. Take that, if
14 you would, for me.
15 If you flip over to page 109 and -- the
16 pages are over in the bottom right-hand corner.
17 Do you recognize the document in general?
18 **A. Yes.**
19 Q. Is that a page of the logbook?
20 **A. Correct.**
21 Q. Now, if I look down at the page 109, line
22 111, I see Ms. Franklin's apartment --

28

1 **A. Uh-huh.**
2 Q. -- with a telephone number.
3 And then I see on Thursday, December 10,
4 in that column, the number 10.
5 Is that your writing?
6 **A. Yes.**
7 Q. Is there a reason why you would have
8 written just the 10 versus, you know, the 10:15 or
9 10:20, just the number 10?
10 **A. Just that's the time that I recall, or**
11 **that's the time I spoke with them.**
12 Q. Okay. And do you recall seeing
13 Ms. Franklin that day?
14 I know that there's a version out there
15 where you said you thought you saw her somewhere.
16 Tell me exactly what --
17 **A. No, I didn't see her that day. I thought**
18 **I spoke with her on the phone --**
19 Q. On the phone?
20 **A. -- but I didn't see her that day.**
21 Q. All right. When you spoke with her on the
22 phone, is that immediately when you wrote it down or

29

1 did you talk with her on the phone to your
2 recollection earlier in the day and wrote it -- the
3 10 o'clock down later in the day?
4 **A. Uh-uh. I was at the desk around that time**
5 **because I had just came back from doing coffee and**
6 **everything. So I know I was at the desk at the time**
7 **that the phone rang.**
8 Q. Okay. And I assume the next entry on
9 December 11th is not your writing?
10 **A. That's not my writing.**
11 Q. Do you know whose writing it is?
12 **A. I don't.**
13 Q. Could you identify the writings of other
14 receptionists?
15 **A. Uh-huh. Some of them I can, yes.**
16 Q. Let me ask you to do this then. Can you
17 flip back to page 87? Just as a layperson, it looks
18 to me as if that every entry between July 5th and
19 July 9th was done by the same person. Do you
20 recognize that writing?
21 MR. PACE: Object to the form. You can
22 answer.

30

1 BY MR. GAVIN:
2 Q. Yeah, that's just my speculation. I'm
3 just asking if you can --
4 **A. So I know this is Crystal's writing. It's**
5 **either -- this is either Crystal's writing or**
6 **Tiffany's writing.**
7 Q. All right. Well, hold on.
8 **A. Oh. Sorry.**
9 Q. What are -- you got to tell me what you're
10 pointing to.
11 **A. Okay. So page 88, that looks like it's**
12 **either Crystal's writing or either Tiffany's writing.**
13 Q. When you say "that," what are you
14 referring to?
15 **A. Where it says, "read daily schedule when**
16 **residents call," and highlighted "apartments must**
17 **call and check in."**
18 **And then the page prior to that, 87, that**
19 **looks like it's Ashley's writing, where it says "read**
20 **daily schedules when residents call."**
21 Q. Well, but as far as the entries go between
22 July 5th and July 9th, can you make a guess or

31

1 identify that writing?
2 **A. That's either going to be Ashley or**
3 **Tiffany, I believe.**
4 Q. Okay.
5 **A. Yeah.**
6 Q. Were there ever days where you would go
7 back and look at the logbook and there would be
8 several days of incomplete spaces?
9 **A. Go back -- when I would go back, I**
10 **wouldn't go back, like, intentionally where I'm just**
11 **flipping through, I would see that there were**
12 **incomplete spaces.**
13 Q. Did you ever see that they were two, three
14 days at a time?
15 **A. I don't recall.**
16 Q. What would you do -- or what was your
17 instruction if someone went to an apartment because a
18 resident had not checked in and allowed themselves to
19 enter or entered the apartment to check on the
20 resident? What would you do next?
21 What was your understanding and training
22 on what you would do next?

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1 **A. We would go in and announce ourself, say,**
2 **hey, I'm here, I'm just checking on you, loud enough**
3 **so they could hear us. And then we were told that if**
4 **they couldn't or if we didn't hear anyone say**
5 **anything, we would then just walk to, like, the**
6 **general rooms, so, like, walk to the kitchen, look**
7 **around the corner, see if they're there, the same for**
8 **the living room, bathroom area, if the door was**
9 **closed to knock and say, so and so, I'm here to check**
10 **on you, same with the bedrooms.**
11 Q. And if you couldn't find them, what were
12 you told to do next with respect to the logbook?
13 **A. We would -- we were told to let management**
14 **know immediately, like, let Monica know, hey, I went**
15 **to the room, I can't find this person.**
16 Q. All right. Would you -- were you
17 instructed to make a certain entry or not make a
18 certain entry in the logbook?
19 **A. No, not to my recollection. I was not**
20 **told to if this person doesn't show or we can't find**
21 **this person, to do so and so in the logbook.**
22 Q. All right. So you didn't have any

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1 instruction on how to handle a scenario where you
2 walked into the room, were unable to find anybody and
3 you didn't know what to do next?
4 **A. Correct. Not that I recall. Just go to**
5 **tell management.**
6 Q. Did you ever have a situation where you
7 had to do that?
8 **A. I didn't, no.**
9 Q. Was there an out-of-facility logbook
10 separate than the regular call logbook?
11 **A. There was, but it wasn't utilized much.**
12 Q. All right. When you say "it wasn't
13 utilized much," did you, in the course of completing
14 the check-in log, ever compare the out-of-facility
15 logbook against the call logbook?
16 **A. No.**
17 Q. Were you ever told to do that?
18 **A. No.**
19 Q. Were you ever told by anyone to document
20 anywhere if a resident didn't call and you're
21 required to call them?
22 **A. No, not that I recall.**

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1 Q. Were you ever told or were you ever
2 required by anyone to document a physical check that
3 was made on an apartment?
4 **A. I believe after the Ms. Franklin incident**
5 **we would just mark "went to room" and put the time,**
6 **like, if we saw them at their room.**
7 Q. But prior to the Ms. Franklin incident is
8 what we're talking about.
9 **A. Oh. No.**
10 Q. Just a couple more questions --
11 **A. Okay.**
12 Q. -- Ms. Hughes.
13 After the Ms. Franklin incident, all of
14 this came to light; correct?
15 **A. Correct.**
16 Q. All right. Did you hear anything --
17 MR. PACE: Object to form.
18 BY MR. GAVIN:
19 Q. -- from anyone --
20 MR. PACE: All of this. Sorry.
21 MR. GAVIN: I'll be more narrow. I'm
22 just giving a background.

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1 BY MR. GAVIN:
2 Q. Did you hear anyone give a version of what
3 happened with respect to the logbook?
4 When I say "anyone," I'm talking about a
5 receptionist, I'm talking about Tiffany, I'm talking
6 about Monica, I'm talking about anyone that you would
7 have talked to with regard to all of this
8 Ms. Franklin incident, but only in particular with
9 respect to the logbook.
10 **A. The only person I really talked to about**
11 **the incident was Crystal, and she stated that the**
12 **weekend in question that she worked that she had**
13 **pinkeye that weekend so she wrote on the wrong line**
14 **or she thought she had wrote on another line in the**
15 **incident, but that's about it.**
16 Q. Okay.
17 **A. And then I guess that Sunday when**
18 **Ms. Franklin was found, that Holly and either -- it**
19 **was either her or Holly had went to the room to look**
20 **for Ms. Franklin.**
21 Q. Did you ever have any direct contact with
22 Ms. Franklin after that?

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1 **A. No. I spoke with her daughter a couple of**
2 **times after that, just seeing her coming, asked her**
3 **how Ms. Franklin was doing, so on and so forth, but**
4 **not with Ms. Franklin after that.**
5 Q. All right. I know that a report was
6 prepared based on your investigation that included
7 some type of discipline or something against you, but
8 you never were there to sign it.
9 **A. Correct.**
10 Q. Did you ever see that?
11 **A. No.**
12 Q. All right. And did you resign or were you
13 terminated?
14 **A. Terminated.**
15 Q. Did they provide a reason to you why you
16 were terminated?
17 **A. Yeah.**
18 Q. What was the reason?
19 **A. So basically I went -- my son was sick, so**
20 **I went home to give him his medicine because he**
21 **wouldn't let my girlfriend give it to him, and I**
22 **lived at Carriage Hill, so that was about 5 minutes**

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1 **away. I informed someone in the kitchen, because**
2 **they was the only staff there, that I was leaving, I**
3 **gave them the cell phone to say if anyone called,**
4 **please write this down. And I came back like**
5 **15 minutes later. And then Tiffany was informed by**
6 **somebody who I don't know that I was gone for**
7 **45 minutes, which is not true, and she terminated me.**
8 Q. So nothing related to this?
9 **A. Correct.**
10 MR. GAVIN: All right. Ms. Hughes, I
11 don't have any other questions. Mr. Pace may.
12 MR. PACE: Yeah, just a few follow-up
13 questions --
14 THE WITNESS: Okay.
15 MR. PACE: -- Shadell, and then we'll get
16 you on your way.
17 - - -
18 EXAMINATION
19 BY MR. PACE:
20 Q. You mentioned that you worked primarily
21 night shifts?
22 **A. Correct.**

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1 Q. Prior to December, when Tiffany was out,
2 did you -- would you say you worked almost all night
3 shifts, meaning after 5:00 p.m.?
4 **A. I worked more night shifts definitely than**
5 **day shifts.**
6 Q. Would you say you only maybe worked a
7 few day shifts a month --
8 **A. Probably so.**
9 Q. -- in September, October, November?
10 **A. Yeah, only a few a month.**
11 Q. Okay. And primarily you worked the
12 overnight shift, from 1:00 a.m. to 9:00 a.m.?
13 **A. Correct.**
14 Q. And during that shift, you testified that
15 you weren't told to check the call log during that
16 shift?
17 **A. Yeah, like, we check -- we were -- this**
18 **was, like, more of a -- I'm sorry. What is it?**
19 Q. The shift report?
20 **A. The shift report. Yeah. Sorry.**
21 Q. That's fine.
22 **A. This was more of a concern to check to**

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1 **make sure, like, we don't need to know anything from**
2 **the previous shift or any directions. This was more**
3 **what we would check almost every shift.**
4 Q. Sure. But when you did work the -- during
5 the daytime hours, you were aware of the daily
6 check-in system?
7 **A. Correct.**
8 Q. And you knew that the residents were
9 supposed to call in; is that right?
10 **A. Yeah. They were --**
11 Q. And if they didn't call in and you saw
12 them in the lobby or in the dining room, you could
13 check them in visually?
14 **A. Correct.**
15 Q. And so you would write down times based on
16 when they called and when you saw them?
17 **A. Correct.**
18 Q. And on the shifts you worked, did you ever
19 have any issues with never seeing a resident all day
20 long?
21 **A. Probably.**
22 Q. Okay. Did you think it was important that

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1 you visually or talk to them on the phone check in
2 these folks every day?
3 **A. After this situation with Ms. Franklin,**
4 **yes. Prior to this situation with Ms. Franklin, it**
5 **was more of a, you know, if you see --**
6 Q. No, I understand what you're saying. I'm
7 asking if --
8 **A. Yeah. It was more casual.**
9 Q. I understand.
10 I'm asking if you personally thought it
11 was important that you check in on everybody every
12 day. Not what Tiffany told you or anybody else.
13 Did you think it was important that I've
14 got my call log and I need to see all the highlighted
15 people, not everybody, but all the highlighted
16 people, by the end of the day I need to have seen
17 them?
18 **A. It was important to me to make sure my**
19 **residents were okay --**
20 Q. Right.
21 **A. -- and the residents that we're used to**
22 **seeing every day --**

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Q. Right.
A. -- like, if we didn't see them, like, something's wrong.
Q. Sure.
A. But for the residents that I didn't see every day -- because I -- I didn't know all the residents, to be honest.
Q. Working the night shift?
A. Correct.
Q. Right.
A. So, like, if I didn't see my usual crew of residents, then it would be like, hold on, where is so and so, they're usually down on 656, and I haven't seen them.
Q. So you cared about the residents, right?
A. Yes.
Q. And you wanted to know how they were doing, right?
A. Correct.
Q. And the call log was something that you were told was a duty, and you would put the times down when you saw them, right?

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A. Correct.
Q. Do you recall ever having a problem during a day shift when you were in charge of the call log where you couldn't find somebody, you didn't see them and you had a concern?
Was there ever an incident like that when you were on the day shift?
A. Maybe once or twice, it was one of my favorite residents, I -- well, not favorite like I didn't like the other ones --
Q. Right.
A. -- but we would always sit and talk. So sometimes if I didn't see her come through for church, I'm like, hmm. But then someone would say, oh, she came to breakfast, I saw her.
Q. I see.
A. Just in, like, general conversation.
Q. I understand.
So there was never somebody that you didn't know where they were during a day and had to a raise an alarm?
A. Correct.

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Q. If that had happened, you would have told Monica?
A. Yeah.
Q. Okay. All right. Did you ever say to Tiffany or Monica that there were issues with the check-in log?
A. No.
Q. Okay. All right. You mentioned earlier that -- and let me make sure I get it correct -- that you did see blanks in the logbook during the overnight shift?
A. Correct.
Q. Did you ever report that to anyone?
A. No.
Q. Okay. And you understand that primarily during the day shift it would have been either Tiffany or Diane Gentry Ross, sometimes Ashley Evans, who were working the day shift?
A. Correct.
Q. Is it safe to say they were primarily in charge of the daily check-in?
A. Yeah.

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Q. Okay. And did they ever express to you that they thought the daily check-in was important?
A. Ashley would say, hey, guys, make sure we're looking at the daily check-in, but that's about it, because sometimes I would see Ashley because she would work a 5:00 to 1:00 shift --
Q. Right.
A. -- so we would do a switch-over.
Q. Okay. And Ashley's a sweet person, isn't she?
A. She is a sweetheart.
Q. One of the nicest folks I've ever met.
All right. And you mentioned earlier, just briefly, that you disagreed with Tiffany's decision to terminate you for what you had to do to go home?
A. I did disagree with her decision, but at the same time Commonwealth was just a -- like, a part-time job to me --
Q. Okay.
A. -- so it wasn't something that hurt me like financially or anything.

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Q. Okay. Did you have a verbal altercation with Tiffany --
A. Uh-huh.
Q. -- during that?
Would you -- is it safe to say you didn't get along with Tiffany before that?
A. I got along with Tiffany, but Tiffany -- she was rude. Just point blank, period, she was rude.
Q. Had y'all had any altercations, verbal --
A. Before that?
Q. -- prior to this?
A. Nope.
Q. Okay. Had you ever had an incident where you had been rude to her and had written her a note apologizing?
A. I don't recall, unless I was just sucking up to her. Just being honest.
Q. I understand.
A. Not trying to be mean or anything, like.
Q. Right. Right.
You wouldn't write her a note apologizing

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for anything that you have a memory of doing?
A. Correct.
MR. PACE: Okay. Okay. I think that's all of the questions I have. I appreciate it.
MR. GAVIN: I don't have anything else. Ms. Hughes, thank you.
THE WITNESS: You're welcome.
MR. PACE: Thank you. I appreciate you coming in.
MR. GAVIN: Now, I don't represent you, Mr. Pace doesn't represent you, all right, but we don't want to burden you any more. You have a right to read what she took down and to look at it and to make sure that what she took down is accurate.
Now you can't change what she took down, you can just verify that what she took down is accurate, or you can waive that right. All right. And if you waive that right, you just need to tell her, and then we don't have to track you down and get you to review it and then do something else. Okay? But you need to tell her.
THE WITNESS: Okay. Everything I said

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was accurate, so --
THE REPORTER: So you want to waive the reading of the transcript?
THE WITNESS: Yeah. I mean, I can read it. Yeah, I'll read it.
MR. PACE: You can do whatever you want.
MR. GAVIN: You can do whatever you want.
MR. PACE: I'll mail it to you if you give me -- you know, the best address to mail it to you.
THE WITNESS: Yeah, you can just mail it to me. I can get it -- my address.
MR. PACE: And he's right, the only thing you can change is if you say --
THE WITNESS: And you guys both have my e-mail address as well.
MR. PACE: Sure. If you said that the light was red, and you meant to say it was green, you couldn't go back and change that now.
THE WITNESS: Oh, no, I don't need to change anything.
MR. PACE: All right. But if you said it

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was Alfreda and it was really Alfred, you could change that more or less because it's the same thing and maybe she just misunderstood you.
THE WITNESS: Yeah, I'll read it, and then --
MR. PACE: Okay.
THE WITNESS: -- like, just send me a copy of it. I'll read it.
MR. PACE: I'll get it to you.
THE WITNESS: Or do I need to read it now?
MR. PACE: No, no. It will be typed up --
THE WITNESS: Okay.
MR. PACE: -- finalized, and then I'll send it you.
THE WITNESS: Okay. That's fine.
MR. PACE: Okay.
THE WITNESS: Do you want my --
MR. PACE: And, actually, while we're still on the record, if you'll give me the best address to send that to you.

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THE WITNESS: Sure.
MR. PACE: Okay. Go ahead.
THE WITNESS: So it's 280 Riverbend Drive.
MR. PACE: All together?
THE WITNESS: Uh-huh. Apartment 2-E, and that's Charlottesville, Virginia, the ZIP code is 22911.
MR. PACE: 22911. Okay. Well, thank you, Ms. Hughes.
THE WITNESS: Thank you.
MR. GAVIN: Ms. Hughes, what was that number again?
THE WITNESS: Oh. 280.
MR. GAVIN: 280?
THE WITNESS: Riverbend --
MR. GAVIN: Right.
THE WITNESS: -- Drive --
MR. GAVIN: Right.
THE WITNESS: -- Apartment 2-E --
MR. GAVIN: 2-E.
THE WITNESS: -- Charlottesville,

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Virginia 22911.
MR. PACE: All right. We're done.
MR. GAVIN: Yeah, we're done. Thank you, Ms. Hughes.
THE WITNESS: Okay.
THE VIDEOGRAPHER: This marks the end of Tape Number 1 and concludes the deposition of Shadell Hughes. Going off record at 10:47:22.
- - -
THE REPORTER: Would you put your transcript orders on the record?
MR. PACE: I'll get whatever typically we've been getting in this case. And my paralegal, Steve Marks, can tell you.
MR. GAVIN: And I'd like an e-copy and a hard copy.
THE REPORTER: Okay. Ten days is fine?
MR. GAVIN: Ten days is fine.
(Signature having not been waived, the Deposition of SHADELL HUGHES concluded at 10:48 a.m.)

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ACKNOWLEDGMENT OF DEPONENT

I, SHADELL HUGHES, do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct and complete transcription of the testimony given by me and any corrections appear on the attached Errata sheet signed by me.

_____ _____
(DATE) (SIGNATURE)

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COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

I, Kimberly L. Ribaric, Registered Professional Reporter, Certified Court Reporter and Notary Public in and for the Commonwealth of Virginia at Large, and whose commission expires August 31, 2020, do certify that the aforementioned appeared before me, was sworn by me, and was thereupon examined by counsel; and that the foregoing is a true, correct, and full transcript of the testimony adduced.

I further certify that I am neither related to nor associated with any counsel or party to this proceeding, nor otherwise interested in the event thereof.

Given under my hand and notarial seal at Fluvanna County, Virginia, this 11th day of November 2016.

_____
Kimberly L. Ribaric, RPR, CCR
Notary Public Registration No. 348266
Commonwealth of Virginia at Large

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