

Final Reply Brief of Appellant

The State of South Carolina  
In The Court of Appeals

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Appeal from Richland County  
S.C. Workers Compensation Commission

JUL 28 2021

SC Court of Appeals

Commissioner(s): G. McCaskill, R. Taylor, M. Campbell II.

Case No. 2021-000121

S.C. Department of Mental Health,  
Employer, and State Accident Fund,  
Carrier.

Respondent.

v.

Dana L. Dixon  
Employee

Appellant

Final Reply Brief of Appellant

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## Statement of Issues On Appeal

Why would Dr. Hynes excuse me from work  
from January 31, 2017 til February 08, 2017  
for an broken or fractured hand or wrist?  
R.p. 287.

Why didn't the Respondent give me the form titled  
Employee/Supervisor notification to sign with Dr. Hynes  
medical instructions? R.p. 287

Why did the Respondent fabricate the Employee/Supervisor  
notification form that I was given to sign on  
February 03, 2017? They were completed by the  
same person. R.p. 288.

Are the Respondent willing to give their definition  
of the arm to this court? R.p. 87. lines 7-8

Can the Respondent show where on their Exhibit A  
(Report of Injury) where hand, wrist, Elbow is  
written by me? R.p. 300-303

Why was the 3 new injuries accepted but  
the right shoulder wasn't? R.p. 265. L. 6.

On the morning of January 31, 2017, I wrote in my (m-300) 1.  
Statement something popped in my right shoulder. Where is that form?

## Statement of Issues on Appeal

Is that Form?

What was the purpose of Respondent mentioning my car accident of March 05, 2017?

Did the Respondent forget that after my last doctor appointment on March 06, 2017, I did not have another appointment due to Dr. Hynes was waiting on MRI? And that was denied. Then on March 23, 2017 I was released.

R.P. 276. R.P. 279.

Did Respondent use this case to subpoena all medical records from Providence A.E, Baptist, Peckland, Providence to use for my 2016 case? R.P. 305-313, R.P. 314, R.P. 315, R.P. 327.

Why did the Respondent state on record that they had not received subpoenaed medical records, when they certified mailed me copies of the medical records postmarked February 22, 2019 with pre-hearing brief packet?

R.P. 304, R.P. 326, R.P. 338, R.P. 177-180.

If the Respondent needed subpoenaed medical records for this case (hearing) why do the subpoenas say to mail them on or before March 13, 2019 when the hearing was on the docket for March 07, 2019? R.P. 305-313

## Statement of Issues On Appeal

Why didn't the Respondent include the entire medical record of Carolina Occupational Healthcare instead of 22 pages from it? R. p. 264-285.

Why did the Respondent request my medical records from the hospitals in South Carolina, but didn't subpoena or request medical record from C.W. Williams where I stated on record I had went for R. Shoulder, Back and MRI? R. p. 305-313

Why were the Respondent so adamant about stating "I did not feel the need to provide copies of those records" of MRI (Tr. p. 55 line 25, Tr. p. 56 lines 1-3) and 67-211C applied (R. p.

Who is he that Respondent referred to? (Tr. p. 56, L. 1) R. p. 87, L. 1

Why did the Respondent deny the Right Shoulder even when Dr. Hynes changed his assessment and wrote the order for the MRI?

Did Respondent make their decision based on the fact that I had previous Right rotator Cuff Surgery? (see email) R. p. 291

## Statement Of Issues On Appeal

Why was the doctor (Motycka) Assessment of Right Lateral Epicondylitis accepted when that's not what I wrote on Respondent Exhibit A? R.p. 300-303

Why was Dr. Hynes, Assessment after January 31, 2017 no longer acceptable, but the doctor who seen me only once (February 17, 2017) diagnoses out weighed the doctor who treated me any other time?

Why didn't Dr. Hynes mention I had issues with my elbow or write elbow from January 31, 2017 thru February 08, 2017? R.p. 264-268.

Since there was no X-ray or ultra sound of the alleged Right Lateral Epicondylitis (Tennis Elbow) and that condition deals with the tendons and is very painful. In Dr. Motycka notes he wrote in the physical examination of page 6 line 3. @ Elbow (red, crepita (swelling, warmth) with all of that why write and order for physical therapy especially when I still could not lift my right arm? (pg 18 of the medical record: History line 8 reads RTC repair, goal is to use and lift arm normally.) R.p. 269. L. 21, R.p. 272.

## Statement of Issues on Appeal

The Respondent have stated that Dr. Hynes mentioned my Right Shoulder on February 24, 2017. (page 10 of medical record) for the first time; So why on page 18 of medical record in the treatment section it has @lat sh ?

R.p. 273, R.p. 280

So if Dr. Hynes didn't mention my right shoulder until February 24, 2017 who authorized physical therapy on February 23, 2017 of treatment of my right shoulder ?

R.p. 280.

Dr. Motycka wrote order for physical therapy on February 17, 2017 and on February 23, 2017 was first day (R.p. 280). There is no mention of my shoulder in his notes, so that would leave Dr. Hynes, correct? even though it was for that date.

## Statement of Issues on Appeal

Please help me to understand. . On January 31, 2017, I arrived at the doctor office of John Hynes. Where the Respondent told me to go. I arrived 4 hours after work injury unable to lift my right arm and serious pain in shoulder that radiated down entire arm. I tell the doctor I can't lift my arm and about the pain.

Dr. Hynes popped a white pill and tells me it's my wrist, hand give me a prescription for Naproxen. then weeks and one day later I have new injury of Right Lateral Epicondylitis from a doctor that I saw only once on February 17, 2017 (R. p. 269-272)

So because I wrote forearm immediately after work injury and the fact that I had a prior rotator cuff surgery (R. p. 275) in 2003, my shoulder is denied, but the new injury of Right Lateral Epicondylitis is accepted, wouldn't that be considered a new injury?

# Standard Of Review

On March 07, 2019, Respondent asked okay, and he sent you to physical therapy? (Tr. p 29 line 9) R. p. 138. L. 9. Correct (Tr. p. 29. line 10) R. p. 138 line 10. But on page 9 of the alleged medical record of Carolina Occupational Healthcare (pages) shows that Dr. Motycka wrote the order to send me to physical therapy not Dr. Hynes. (R. p. 272) And he had you on light duty (Tr. p. 29. L. 13) (R. p. 138. line 13) Correct. (Tr. p. 29. line 14) R. p. 138 line 14. Was your employer able to accommodate that? (Tr. p 29. line 15) R. p. 138. L. 15. I moved to another location, so yes. (Tr. p 29 L. 16) R. p. 138. L. 16. Okay so you were still working (Tr. p 29. L. 17) yes (Tr. p 29. L. 18) R. p. 138. L. 18.

But Respondent did not feel the need to have me sign the form titled Employee/Supervisor Notification form that was submitted at the hearing that states "out of work until medical visit on February 08, 2017" R. p. 287. The form is dated February 06, 2017 and does not have my signature. But on February 03, 2017 Respondent gave me a Employee/Supervisor Notification that has the work restriction and my doctor appointment and accommodation date of February 02, 2017 @ Bryan A & D Office. My signature, date only.

— Also On March 07, 2019, I got confused —

## Standard Of Review

I gave answers to W.C.C. file No. 1623303 for W.C.C. 1712879. For instance tr.p 81. Lines 11-15 was for my injury of December 22, 2016. (R.p. 140. Lines 11-15) (See time Card of 01/2017 & 02/2017). I wish that it was a camera in the Court room on March 07, 2019 to show where I held up my cell phone and said "I have a voicemail from Megan right here". For the Respondent to hear Megan saying "I see that you are calling me, I am going to click over" I filed a motion for voice mail.

R.p. 290, R.p. 250-252, R.p. 255-263, R.p.

330.

# Standard Of Review

? Transcript page 54 Lines 4-7 (R.p. 85 L. 47)

Tr.p. 29 Lines 15-18 (R.p. 138 Lines 15-18). In Respondent Brief number 10 of page 3 states I had a pre-existing injury, due to me having surgery in 2002 for "right Rotator Cuff." And was able to do my job each time I've been employed by Respondent AFTER I had my surgery.

Respondent erred by stating that I filed my Second Form 50 in November 2018. In March 2018, my then attorney was relieved as my attorney (R.p. 320-324). The Respondent have not of yet submitted one document to show where I wrote, Hand, Wrist, Elbow. (R.p. 300-303)

) The Respondent have withheld the faxed medical instructions of Dr. Hynes of me being out of work from January 31, 2017 (R.p. 287) til my next doctor appointment which was February 08, 2017. Then used intimidation of me losing my job to report to work on February 02, 2017. Then fabricated another Employer/Supervisor Notification form for me to sign on February 03, 2017. (R.p. 288) Respondent Spoilation of my medical record from Carolina Occupational Healthcare (entire) that has been reduced to 22 pages (R.p. 264) should not have been listed as medical record, (R.p. 177-180) due to 22 pages come from the medical record I filed a motion for (R.p. 255-263, R.p. 330) of same nature and character and was denied.

# Standard Of Review

- The Respondent made up their mind not to give authorization based on the fact that I had prior Rotator Cuff repair (R.p. 275, R.p. 280.L.18) previously (please see email) R.p. 291. Even after Dr. Hynes had changed his assessment (R.p. 274) to right shoulder strain, and wrote an order for MRI (R.p. 277) due to "CHRONICITY" Respondent have stated that Dr. Hynes mentioned my shoulder for the first time on February 24, 2017,<sup>(9)</sup> But he had me out of work with a brace for my WRIST only, for an entire week (R.p. 287) I feel the Respondent blatant disregard of Dr. Hynes medical instructions were unethical and showed no regard to my injury to my right shoulder injury of January 31, 2017, by having me to return to work under intimidation of if I didn't I could be terminated. Then had the audacity to submit the Employee/Supervisor notification showing Dr. Hynes instructions as though I was out of work (R.p. 287). To me it seems as though, once the documents from Carolina Occupational Healthcare was faxed to my supervisor on January 31, 2017, was premeditated due to Employee/Supervisor form is dated February 04, 2017. As Respondent have mentioned several times I am not an attorney.

I am a person who received a physical for my (Department of Transportation) for my class A C.D.L on 01/14/2016. R.p. 296-298. And the physical on November 21, 2016 that job offer was contingent upon. (See offer letter

# Standard Of Review

dated November 18, 2016) R. p. 299. From Respondent, who was injured on the job on December 22, 2016 and again January 31, 2017. (Back, Shoulder) On January 31, 2017 after 24 hours after injury the pain was severe, entire arm is throbbing and I could not lift my right arm. But due to Dr. Hynes not charting what I told him (my right shoulder) he writes hand, wrist. My right arm still hurts; me stating right arm, I was not trying to determine Workers Compensation definition of the arm. I still say my arm is from my finger tips to my (See page 1 of Respondent alleged medical record (R. p. 264) shoulder, I was told the definition of the arm by Respondent while "having" phone conference on May 29, 19 @ 4pm. R. p. 87. Lines 7-8.

The Respondent asked me on March 07, 2019 if I had provided those records (from C.W. Williams Community Health) to anybody over at the State Accident Fund. (Tr. p. 30 Lines 9-10) R. p. 139. Lines 9-10, R. p. 56. Line 25, R. p. 56. line 1. I replied no. I just got them Monday (Tr. p. 30. L. 11) R. p. 139. L. 11. This is from March 07, 2019 transcript. On Tr. p. 56. Lines 22-25. Tr. p. 56. line 1. (R. p. 86., R. p. 87) And the MRI report was received at the Commission on February 21, 2019. 67-211c. Transcript of February 22, 2019. R/50.

On February 22nd at my subpoenaed deposition (R. p. 333-334) H

## Standard Of Review

Respondent asked me when was the last time I was seen by Dr. Saunders (Tr. p. 35. Lines 8-9) R. p. 66. I stated the 15 of February (Tr. p. 35. Line 10) R. p. 66 Line 10. of this year? (Tr. p. 35. Line 11) R. p. 66. Line 11. Correct. (Tr. p. 35. Line 12) And <sup>what was</sup> that for? (Tr. p. 35. L. 13) R. p. 66. L. 13. To get my reading, and before that it was on (Tr. p. 35. Line 14) R. p. 66. Line 14 the first.

Transcript of deposition of March 07, 2019

Respondent stated when I asked you in your deposition if you've ever (Tr. p. 30. L. 12) received treatment between March of 2019 and January (Tr. p. 30. L. 13) you indicated that you had not. R. p. 139. Lines 12-14.

R. p. 65. Lines 22-25, R. p. 66. Lines 1-24. Tr. p. 30. L. 15. No I couldn't have said that because it's like. I went and got the MRI done there. Tr. p. 30 Line 16. (R. p. 139 Lines 15-17) I did mention C. W. Williams. Tr. p. 30. L. 17. (R. p. 139. Line 17)

Tr. p. 12 Lines 2-3) R. p. 43. Lines 2-3) Oh goodness. I think it was 2700 Feather Trail Run. My last address is listed on the form 50 (R. p. 294) that my then attorney filed on September 05, 2017. (1011 Beatty Rd. Apt 157 Columbia, S.C. 29210) (R. p. 295) (See form 50 dated September 2017)

# Standard of Review

During my deposition the Respondents asked me  
Have you worked anywhere since you left DMH? (TR.p.29  
Line 11) yes (TR.p.29. Line 12) Where did you work? (TR.p.29. Line  
18) I worked at McDonald's. (TR.p.29 line 14) Worked any  
Where else other than McDonald's Since you left DMH? TR.p.30  
Lines 3-4) And how long did you work there (TR.p.30. Line 14)  
I'd say two months (TR.p.30 line 15.) Anywhere other than  
Wendy's and McDonald's. (TR.p.31. Line 7) How long did you  
work there? (TR.p.31 line 13) A week (TR.p.31 Line 14) Anywhere  
else other than Captain D's, Wendy, McDonald's (TR.p.31. Lines 19-20)  
ABM Industries (TR.p.31. Line 21) How long did you work there?  
(TR.p.32 line 1) I would say two months (TR.p.32. Line 2) Anywhere  
else? (TR.p.32. Line 6) Another McDonald's (TR.p.32 Line 7) And how  
long were you there (TR.p.32. Line 10) Three days (TR.p.32. Line 11)  
Okay. Anywhere else? (TR.p.32. Line 19) Church's chicken (TR.p.32  
Line 20) How long were you there? (TR.p.32. Line 24) February 7th  
I got the job. maybe two and a half months (TR.p.33 line 1-2)  
And you're not working currently? (TR.p.33 line 16) Currently no.  
(TR.p.33. Line 17) I was honest before my deposition  
and afterwards. I answered Respondents questions at  
my subpoenaed deposition of February 22, 2019. Then ask me  
same questions at the hearing on March 03, 2019. Then it's different  
in the order (signed). Respondent have wanted to make the fact  
that I was trying to work the cause of my torn Rotator Cuff  
AFTER THE FACT, I can not say it enough I wrote my statement  
on January 31, 2017 stating something popped in my right shoulder by

# Standard of Review

Keeping MS. Ruby (patient) from falling face forward out of her wheel chair. But again the Respondents was not forth coming with that document either.

On January 31, 2017 I was injured at 6:00 AM.

At 6:05 AM I reported injury to MS. Davis, MS. Williams. I am then given the S.C. Department of Mental Health Witness Statement of Injury or Illness Form to write my statement. My Supervisor comes to unit to escort me to her office and collect my statement. In her (Caroline Akpan) office she gives me a S.C. Workers' Compensation packet to complete. She calls Comperdium (Carrie) to get authorization. She gives me the phone in order to explain what happened which caused me to pause on completing packet. I arrived at Doctor Office at 10:00 AM (MS Akpan dropped me off)

\* On January 31<sup>st</sup>, 2017 while in the exam room with me, Dr. Hynes popped a white pill. And after doing so he then tells me that he had just returned from having back surgery. I did not tell the Respondents, I reported Dr. Hynes to the Medical board. The Respondents states its an allegation and nothing is the record to state Dr. Hynes acted inappropriate. I don't feel that Dr. Hynes, would want that in record or on record. (please see subpoena)

## Standard Of Review

Respondents have stated that I was in a motor vehicle accident on March 9, 2017. I went to work and physical therapy on March 6, 2017. That is the day Dr. Hynes wrote the MRI order.

I did not have any appointments due to Dr. Hynes was waiting on MRI. On March 23, 2017 I am released from medical care. (Please review Carolina Occupational Health Care pages). (R. pages. 264-285)

# ARGUMENT

At the March 07, 2019 hearing, it seemed as if Commissioner had made up his mind before the hearing had started. Tr. p. 12. Lines 21-23 (R. p. 12. L. 21-23) Tr. p. 13. Lines 3-4. (R. p. 12. L. 3-4) Tr. p. 13. Lines 12-13. (R. p. 12. L. 12-13) Tr. p. 14. Lines 13-14. (R. p. 12. L. 13-14)

On page 14 of the March 07, 2019 hearing the Respondent stated (Tr. p. 14. Lines 19-21) to explain the some of the reason for some of the concern given the two (2) year delay in kind of raising this issue at this. (R. p. 123. Lines 19-21) Respondent knew that my then attorney filed a form 50, on September 05, 2017. And on March 15, 2018, my then attorney was relieved as my attorney (R. p. 320-324) As Respondent have stated numerous times that I am not an attorney, so I didn't know the case had closed when Mr. Cruse was no longer my attorney. When I called the Commission I was told the case had closed and was asked if I wanted it re-opened, I said yes. I was mailed the form 50.

# Argument

Respondents stated that I alleged that I injured myself "While assisting a resident who was seated in a wheelchair" in their brief. On 02/21/2019 at my Subpoenaed deposition I stated TR.p.59. Lines 20-25. TR.p. 60 Lines 1-6

Respondents should know that after my attorney was relieved on March 18, 2018 the case closed which meant that I had to refile a Form 50. which I did.

R. p 320-324

Respondents filed a form 51 denying injury to my right shoulder, instead asserted that injury was to my right arm. which Respondents definition of the arm is Hand, wrist, Elbow. Only.

Respondents have stated that the previous form 50 that was filed by my then attorney put injury was to my right Hand. If the attorney was not willing to rewind the recording of my statement to listen to what I had stated or to look at the first report of injury to see what I wrote, he should have been professional. (After all they came to my home and took my statement)

Respondents were untruthful about not having medical records they had subpoenaed. Due to the fact that Respondents Form "Request for medical Records" dated 01/18/17 (R.p. 327)

Shows that Respondents Requested my medical records for Work injury of 12/22/2016, E.R. Visit 12/23/2016. And then Used 4 Subpoenas dated 02/27/2019 that ask providers to MAIL the records on or before MARCH 13, 2019 (Hearing Was Set For MARCH 07, 2019) And Respondents Certified Mailed me Copies of medical (Subpoenaed) records with the Pre-Hearing brief dated February 22, 2019. (see envelopes)

R. p. 327

The Respondents have stated that I <sup>had</sup> a motor Vehicle accident, and that is correct on March 05, 2017. On March 06, 2017, I was at work and was able to make my appointment with Carolina Occupational HealthCare. (see medical record)

R. p 275-277.

The Respondents Opinion of the reason of my objection is inflammatory and Bias. Due to I never stated my reason was because, I was living in a transitional Home (Transcript of 02/22/2019) TR. p. 12. Lines 19-21. (Transcript of 03/07/2019) TR. p. 17. Lines 14-15. And I never stated I had limited access to transportation. 03/07/2019 transcript page 10. Lines 18-25. TR. p. 11. Line 1. I objected due to the Respondent were untruthful about not having received the Requested & Subpoenaed records. R. pages 304-305, R. p. 324, R. p. 332

Respondents findings of fact. No. 5 is incorrect and due to the spoliation of Respondents by removing the statement - 18

# Argument

that I wrote on 01/31/2017 (Witness Statement) that is mandatory by S.C. Department of Mental Health, and goes with the S.C.W.C.C. First Report of Injury packet. I never wrote "While moving Resident." It would show where I wrote "Something popped in my right shoulder." just as I stated on 02/22/2019, at my subpoenaed deposition. TR.p. 60 Lines 1-6. The Respondent is writing what Dr. Hynes wrote in my medical record. TR.p. 56. Lines 9-12. R.p. 264

Respondents number 6, states that I wrote Forearm and can state what I wrote on the Form 50 about my right shoulder. But have not submitted one document to show where I wrote Hand, Wrist, Elbow. (02/22/2019) transcript p. 56. Lines 9-15. But have made the fact that I wrote FOREARM on First Report of Injury (Exhibit A of Respondents) But received treatment for the Respondents definition of the arm. (Hand, Wrist, Elbow) R.p. 300

Respondents number 7, states they provided medical care and treatment for my right arm, including my elbow treatment of 2 NEW injuries I was diagnosed with on January 31, 2017. In the medical record of Carolina Occupational Health Care Dr. Hynes wrote (page 1) states that I "stated that I strained" my hand, wrist and forearm. Which I didn't say. But for the Respondents to accept the alleged NEW injuries on the statement Dr. Hynes wrote alleging I said it, but while still under Dr. Hynes care (pg 1) He wrote-

# Argument

- holds @ arm protectively. And on that same page CC: Rt arm. But after Dr. Hynes had changed his Assessment to Right Shoulder Strain. And wrote an order for an MRI due to chronicity (pg 13 of medical record & page 14)

R. p 276

In the Respondents fabricated medical pages from original medical records of Carolina Occupational Healthcare; page 12 shows that on March 06, 2017, Dr. Hynes wrote "prior Rotator Cuff Surgery" after my 4th visit. And on the new patient forms that is required by all medical providers (questionnaire) that ask about family history of mother, father, siblings, any surgeries would have shown I wrote ALL surgeries, and Rotator Cuff was listed. But Respondents did not submit medical record in its entirety only 22 pages from it. I went from having an MRI on March 21, 2017 (that was scheduled) of right shoulder. On page 21, dated February 29, 2017 (progress notes: "C/O is @ shldr pain, but understands that is not covered by w/c @ this time". R. page: 283

On pg 18 of the fabricated medical record Line 13 it states "goal is to use & lift arm normally." On page 10, Dr Hynes wrote "has had one session P.T" dated 02/24/2017, then wrote (R.p. 273) states pain in @ shoulder now, somewhat difficult historian hard to obtain cohesive history. On page 21. Line 10 it states 4 UBE (R.p: 283) attempted but unable to complete 20 @ shoulder pain. On Line 13 it states "pain in @ shoulder main limiting factor at this time. On March 06, 21 Dr. Hynes writes order for MRI, Denied. 20

# Conclusion

On March 15, 2017 I received phone call telling me that the only way I get the MRI is if I pay for it out of my pocket, and on March 23, 2016, Dr. Hynes wrote on page 16 of medical record these words: "Resolving States ready to ? normal duty." Even though I still could not lift my right

arm. Also in the assessment Dr. Hynes wrote <sup>(2)</sup> @ shoulder pain not authorized by WKC" R.p 279

Respondents have written and stated that Dr. Hynes had stated the following: 1. States pain in @ shoulder now. (p. 10)

2. Very inconsistent exam hard to pinpoint anatomy area of pain" but respondents failed to mention that every visit I had

at Carolina Occupational Healthcare respondents knew and received copies of Dr. Notes, Restrictions, physical Therapy.

and my supervisor Lorain Tracy received work status forms

and any other forms pertaining to me working, all by fax. (R.pgs. 265, 268, 274

(Sec record) # my assigned shift was 11pm til 7:15 am\* On 01/31/17

my work injury occurred at 6:00 am. I reported it at 6:05

am. Before I could leave to go to the ER, (Never filed workers

compensation with respondents since I began my employment

with them in October (1988) but I was told that I had to

write a my M-300 (S.C. Department of Mental Health witness

report of injury or illness) right then because I didn't complete

one on 12/22/2016. (In Designation of matter I listed the same (R.p. 325

form to show even though it's 22 days after my work injury of 12/22/16. 21

I had to complete the mandatory form) But the form was not

# Conclusion

Submitted. (The fax numbers are listed on pg 2, pg 5, pg 11, pg 16 to my supervisor Mrs. Lorain Tracy.) The word FAXED is on pages 1, 2, 7 (R.p. 264-279) 9, 10, 11, 12, 13, 15, 16 of the 22 page medical report pages of Caroline Occupational Healthcare. Respondents failed to mention that Dr. Hynes had me out of work from January 31, 2017 (date of injury) through February 02, 2017 (my next appointment)

On January 31, 2017 I received a call from the Respondents telling me I am to report to my new modified assignment (R.p. 289, 288) at Bryan A&D (Admission & Discharge) of February 01, 2017 at 8:30 am. I told the Respondent that I will not be able to make it. I was told to report at 8:30 on February 02, 2017.

On February 02, 2017, I received a phone call. Letting me know that I was to have reported to Bryan A&D. And if I did not report that morning I could be terminated. I caught the City bus and clocked in at 10:30 am (see Time Card) (R.p. 290)

On February 03, 2017, Respondents gave me a form titled Employee/Supervisor Notification that has my next appointment, (R.p. 288) the shift I was to work and the site I was to report to. I signed that form. I was given the memorandum of light duty (R.p. 289) Agreement, I signed that also. The form titled: Employee/Supervisor Notification that's submitted at the Commission for the Hearing of March 07, 2017 has Dr. Hynes instructions of me being (R.p. 289) out of work and the form is completed by hand. And it does NOT have employee signature (I never received that form)