

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2014-001996

Frank Wilson, Appellant,

v.

American LaFrance, Employer, and AIG C/O Gallagher Bassett Services, Inc.,
Carrier, Respondent,

FINAL BRIEF OF APPELLANT

Frank Wilson
8755 Jessica Court
North Charleston, SC 29406
(843) 327-9616
Appellant

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SC Court of Appeals

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STATEMENTS OF ISSUES ON APPEAL/STATEMENTS OF THE CASE

On May 16, 2005, Frank Wilson, Appellant, was involved in a very extensive work related accident (motor vehicle accident). The Appellant suffered multiple injuries to the following body parts: **Back/Neck/Ribs/Lungs/Right Shoulder/Left Shoulder/ and Bladder**. On September 6, 2013, the Appellant attended a STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court Hearing (**Case No. 2013CP1801299**) with the Honorable Diane S. Goodstein to address and determine the issues on appeal from the Lower Court. On December 17, 2013, the Honorable Diane S. Goodstein issued a STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court Hearing **ORDER**. This court **ORDER** stated that the South Carolina Workers' Compensation Commission were ordered to supply the STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court with a complete copy of the Appellant's South Carolina Workers' Compensation Commission case file- (**WCC File No. 0506037**). This was for the purpose of the court to have an account of all of the facts involved in this very extensive case. Due to the necessary time needed to conduct a fair Hearing with all of the facts involved addressed and determined, the Honorable Goodstein left this case open for continuation. This was to allow time for the South Carolina Workers' Compensation Commission to deliver a complete copy of the Appellant's South Carolina Workers' Compensation Commission case file- (**WCC File No. 0506037**). On March 12, 2014, the Appellant attended a Hearing with the Honorable Maite Murphy which was a part of the continuation Hearing from the Hearing (**Case No. 2013CP1801299**) with the Honorable Goodstein on September 6, 2013. This was also to address and determine the issues on appeal from the Lower Court. Furthermore, on March 12, 2014 when the Appellant attended the Hearing with the Honorable Murphy, the Honorable Murphy would disregard the December 17, 2013 court **ORDER** of the Honorable Goodstein. This court **ORDER** clearly stated that the South Carolina Workers' Compensation Commission shall provide a complete copy of the Appellant's South Carolina Workers' Compensation Commission case file- (**WCC File No. 0506037**) to the STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court. The Honorable Goodstein stated in the court **ORDER** that without a complete and accurate record, it is impossible for an appellate court to

make a determination. The Honorable Goodstein's statement in the court **ORDER** would be factual. Furthermore, the Honorable Goodstein's statement which is noted in the court **ORDER** would also be fair. I truly do believe in my heart that **GOD** sees the Honorable Goodstein's character of fairness. I have great confidence that this will not go unnoticed by **GOD**. The state of South Carolina needs more court Judges with the character of the Honorable Goodstein. Furthermore, the South Carolina Workers' Compensation Commission needs more Commissioners with the character of the Honorable Goodstein. Finally, the Honorable Murphy's denial of the Appellant's complete South Carolina Workers' Compensation Commission case file- (**WCC File No. 0506037**) to be made a part of the STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court would be unfair and display a lack of impartiality. The Appellant would come to this conclusion based on the fact of the overwhelming evidence that was allowed to be omitted from the STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court **ORDER**. This overwhelming evidence that the Honorable Murphy allowed the Respondents to omit was clearly overwhelming evidence that supported the Appellant's case. **This clearly violates the Appellant's civil rights of having a fair and a Hearing of impartiality.** Furthermore, the Honorable Murphy not allowing the Appellant to have the right to an additional STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court Hearing after the fact that the STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court Hearing held on March 12, 2014 was incomplete. It is of note that the Appellant did make a written request to the STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court. This written request was made after the incomplete Hearing held with the Honorable Murphy on March 12, 2014. This was for the purpose of the Appellant to have an opportunity to give an account as it relates to the supporting facts involved with the issues to be addressed and determined at the STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court Hearing. In addition, the Appellant would have the opportunity to explain and argue his position as it relates to the issues to be addressed and determined which were brought forth on appeal from the Lower Court. The Honorable Murphy's denial of the Appellant's written request for a court Hearing **clearly violates the Appellant's civil rights of having a fair and a Hearing of impartiality.** Furthermore, the fact that the Honorable Murphy allowed the Respondents to prepare the court **ORDER** from STATE OF SOUTH CAROLINA COUNTY OF DORCHESTER IN THE COURT OF COMMON PLEAS court does appear to be problematic. This is due to the fact of The Respondents being the opposing party in this case. In addition, the Honorable Murphy **allowed the Respondents to omit overwhelming evidence from the ORDER issued by the Honorable Murphy of the STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS court.** The overwhelming evidence that the Honorable Murphy allowed the Respondents to omit from the court **ORDER** was clearly overwhelming evidence which supported the Appellant's case. **This clearly violates the Appellant's civil rights of having a fair and a Hearing of impartiality.** It is also of

note that the Honorable Murphy endorsed and signed the STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS court **ORDER** on August 18, 2014. This court **ORDER** was filed with the court on August 19, 2014. The Appellant does understand that by bringing attention to the above issues as it relates to the **violation of the Appellant's civil right of having a fair and a Hearing of impartiality** may also bring about some form of retaliation from anyone who may support this type of action and or this type of behavior. I will certainly rely on my **faith in GOD** to protect and shield me from any such action or behavior. In addition, the Appellant remains in a somewhat disappointed and a disturbed state of mind as it relates to the above action(s) and behavior(s) pattern(s) which continue to be observed by some of the people in power whether they are elected by the people or appointed by the office of the Government here in the state of South Carolina. The Appellant is respectfully requesting that the state of South Carolina Court of Appeals In The Supreme Court address and determine the following issues brought forth on appeal from the Lower Court as described below:

1.) **The Appellant's Thoracic Spine (mid to upper Back) Injury**

2.) **The Appellant's Bilateral Lower Extremity EMG/nerve conduction study**

The Appellant was involved in a very extensive work related motor vehicle accident on May 16, 2005. The Appellant received multiple injuries which included the **Back/ Neck/ Right Shoulder/Ribs/Lungs & Bladder**. The Appellant's **Left Shoulder injury** occurrence took place on or about the third (3rd) or fourth (4th) quarter of 2006 during a work hardening conditioning program and a Functional Capacity Evaluation (FCE). The was while the Appellant's **Right Shoulder injury** was being addressed. The Appellant respectfully request that the Defendants provide compensation, medical evaluation and medical treatment for the Appellant's Thoracic Spine (mid to upper Back) injury. The Appellant is respectfully requesting that the medical evaluation and medical treatment for the Appellant's Thoracic Spine (mid to upper Back) injury be provided by the **Authorized Treating Physician of the Southeastern Spine Institute**. This is based on the **DECISION AND ORDER** issued by The Honorable David W. Huffstetler from the South Carolina Workers' Compensation Commission Hearing held on March 10, 2009. The Honorable David W. Huffstetler's **DECISION AND ORDER** stated that IT IS THEREFORE ORDERED that the Defense shall provide medical treatment for the Claimant's Back through the Southeastern Spine Institute. This is due to the fact of negligence of the Respondents. The Appellant did not receive the orthopaedic management outlined in the **DECISION AND ORDER** issued by Commissioner J. Alan Bass from the South Carolina Worker's Compensation Commission Hearing held on April 10, 2007. The Claimant had an initial visit with Don O. Stovall, Jr., MD of Lowcountry Orthopaedics And Sports Medicine on August 4, 2005. At the time of the Appellant's initial visit on August 4, 2005 with Dr. Stovall, the Appellant stated that as it relates to the orthopaedic body parts where pain was being experienced were of the Neck, Low Back with leg pain, Mid to Upper Back and Right Shoulder. Dr. Stovall stated to the

Appellant that he would initially evaluate and treat the Appellant's Neck, Low Back and Right Shoulder. As it relates to the Appellant's Thoracic Spine (mid to upper Back) injury, Dr. Stovall stated that he would not evaluate and treat the Thoracic Spine (mid to upper Back) because his primary focus would be the Appellant's Lumbar Spine (Low Back), Cervical Spine (Neck) and Right Shoulder. Dr. Stovall stated that once the Appellant's Lumbar Spine (Low Back) was completely evaluated and treated, then the Thoracic Spine (mid to upper Back) pain should be resolved or lessened. This certainly was not the case. The Appellant continued to experience both Lumbar Spine and Thoracic Spine ongoing and continuing pain. The Appellant returned back to Dr. Stovall on March 2, 2009 at the request of the Respondents. It is of note that this was an effort by the Respondents to have Dr. Stovall place the Appellant at Maximum Medical Improvement (MMI) although it was clearly evident that the Appellant was in need of an additional medical evaluate and medical treatment as it would relate to the Appellant's Back. It is also of note that Dr. Stovall was **hand selected by the Respondents**. It is the Appellant's **strong opinion** that Dr. Stovall displayed an act of **bias** throughout the course of the Appellant's initial visit on August 4, 2005 thru the Appellant's last visit on March 2, 2009. As it relates to the Appellant's March 2, 2009 office visit with Dr. Stovall, the Appellant's stated to Dr. Stovall that he had been experiencing **severe ongoing and continuing Lumbar Spine pain** along with ongoing and continuing Thoracic Spine pain with leg pain, Cervical Spine pain, Right Shoulder pain and Left Shoulder pain. Dr. Stovall omitted the Appellant's complaint of **severe ongoing and continuing Lumbar Spine pain** along with ongoing and continuing Thoracic Spine pain and Left Shoulder pain from the Appellant's March 2, 2009 office visit medical report. After the issued **DECISION AND ORDER** from the South Carolina Workers' Compensation Commission Hearing on March 10, 2009 with The Honorable David W. Huffstetler which stated the IT IS THEREFORE ORDERED that the Defense shall provide medical treatment for the Claimant's Back through Southeastern Spine Institute. Once again this was due to the Appellant not receiving the orthopaedic management outlined in the **DECISION AND ORDER** from the South Carolina Workers' Compensation Commission Hearing with Commissioner J. Alan Bass on April 10, 2007. On June 17, 2009, the Appellant's restarted his evaluation and treatment with the Southeastern Spine Institute for his Lumbar Spine injury, Thoracic Spine injury and Cervical Spine injury. On July 11, 2009 the Appellant had a Lumbar Spine **MRI** to address and determine the Appellant's **severe Lumbar Spine pain**. The Appellant's Lumbar Spine **MRI** was ordered by Thomas Roush, MD of Southeastern Spine Institute. The Lumbar Spine **MRI scan** revealed that the L5-S1 disc was completely collapsed and as of a result of this finding the Appellants Lumbar Spine was bone on bone at the L5-S1 levels. This was only four (4) months after the Appellant's March 2, 2009 office visit with Dr. Stovall. It is of note that Dr. Stovall omitted the Appellant's complaint of **severe ongoing and continuing Lumbar Spine pain** along with ongoing continuing Thoracic Spine pain and Left Shoulder pain. The Appellant's Lumbar Spine **MRI scan** on July 11, 2009 explained the **severe ongoing and continuing Lumbar Spine pain**. It is the Appellant's **strong opinion** that the omitting of the Appellant's complaint of **severe ongoing and continu-**

ing Lumbar Spine pain, ongoing and continuing Thoracic Spine pain and Left Shoulder pain was omitted for the purpose of misleading the court and or misrepresenting the facts of the matter. Furthermore as a result of the neglect and or at least mismanagement of the Appellant's **orthopaedic injuries** which included the Appellant's Lumbar Spine injury, Thoracic Spine (mid to upper Back) injury, Right Shoulder injury and Left Shoulder injury, the Appellant finally underwent an expedited L5-S1 fusion surgery by Donald R. Johnson, II, MD of South- eastern Spine Institute in April 2010. In addition, the Appellant finally underwent three (3) Right Shoulder surgeries and one (1) recent Left Shoulder surgery. Due to the neglect and or at least mismanagement of the Appellant's orthopaedic injuries, the Appellant began to develop a worsening of **Bladder function** initially noted on or about September 2007. This would be supported by the medical reports, medical documents and all supporting documents to be introduced as evidence.

(R. p. 3, lines 7-8, 19-20) (R. p. 9, lines 22-23) (R. p. 15, line 4) (R. p. 24, lines 1-6, 9-16) (R. p. 92, lines 21-22) (R. p. 93, lines 19-25) (R. p. 94, lines 1-25) (R. p. 106, lines 1-25) (R. p. 109, lines 1-25) (R. p. 110, lines 1-9) (R. p. 111, lines 22-25) (R. p. 112, lines 1-25) (R. p. 113, lines 1-25) (R. p. 114, lines 1-25) (R. p. 115, lines 1-25) (R. p. 116, lines 1-24) (R. p. 118, lines 3-25) (R. p. 119, lines 1- 18) (R. p. 124, lines 22-24) (R. p. 125, lines 1-25) (R. p. 126, lines 1-25) (R. p. 127, lines 1-25) (R. p. 128, lines 1-16, 19-25) (R. p. 130, lines 7-25) (R. p. 131, lines 1-5) (R. p. 132, lines 2-25) (R. p. 133, lines 1-25) (R. p. 134, lines 1-25) (R. p. 135, lines 1-15) (R. p. 138, lines 23-25) (R. p. 139, lines 1-12) (R. p. 143, lines 14-25) (R. p. 144, lines 1-25) (R. p. 145, lines 1-25) (R. p. 146, lines 1-18) (R. p. 205) (R. p. 222, lines 4-5) (R. p. 230, lines 1-4) (R. p. 231, lines 1-13) (R. p. 235, lines 1-3) (R. p. 236, lines 14-15) (R. p. 238, lines 1-2) (R. p. 242, lines 1-16) (R. p. 246) (R. p. 247, lines 8-17)

3.) **Bilateral Lower Extremity EMG/nerve conduction study**

Due to the fact that Appellant had a **Lumbar Spine surgery** and is continuing to experience Lumbar Spine pain, Thoracic Spine pain, and ongoing and continuing bilateral leg symptoms, the **Authorized Treating Physician** of Southeastern Spine Institute recommended and requested a **Bilateral Lower Extremity EMG/nerve conduction study**. This is the **Authorized Treating Physician** that the Appellant was **ordered** to have his Back evaluation and treatment with. This **DECISION AND ORDER** was issued by the Honorable David W. Huffstetler from the South Carolina Workers' Compensation Commission Hearing held on March 10, 2009.

(R. p. 146, lines 19-25) (R. p. 147, lines 1-25) (R. p. 148, lines 1-25) (R. p. 149, lines 1-17) (R. p. 150, lines 1-25) (R. p. 151, lines 1-14) (R. p. 223, lines 11-12) (R. p. 229) (R. p. 230, lines 1-4) (R. p. 231, lines 1-13) (R. p. 232) (R. p. 233, lines 3-6) (R. p. 234, lines 1-4) (R. p. 237, lines 1-8) (R. p. 239) (R. p. 240) (R. p. 241) (R. p. 242, lines 17-24) (R. p. 247, lines 18-24) (R. p. 248, lines 1-38)

4.) Left Shoulder Evaluation and Treatment Expenses Reimbursement

The Appellant had a South Carolina Workers' Compensation Commission Hearing on April 10, 2007 with Commissioner J. Alan Bass. As it would relate to the Appellant's **Left Shoulder injury**, Commissioner Bass **ordered** the Respondents to provide the Appellant with an updated Cervical Spine MRI to address and determine the Appellant's Left Shoulder pain. If the updated Cervical Spine MRI did not reveal any significant changes from the previous Cervical Spine MRI, then the Respondents were **ordered** to provide the Appellant with a Left Shoulder MRI. Commissioner Bass stated that the record would be held open for thirty (30) days for the Respondents to provide the Appellant with both the updated Cervical Spine MRI and Left Shoulder MRI. The Respondents provided the Appellant with an updated Cervical Spine MRI before the thirty (30) days expired but the Respondents would authorize the Left Shoulder MRI after the thirty (30) days that Commissioner Bass stated the record would be held open. It is the Appellant's **strong opinion** that the Respondents intentionally delayed the authorizing of the Appellant's Left Shoulder **MRI** to prevent the Left Shoulder injury from being made a part of the Appellant's South Carolina Workers' Compensation Commission claim. The Appellant finally began to seek the evaluation and treatment for his Left Shoulder injury on his own as the Appellant's Left Shoulder injury had begun to worsen.

(R. p. 3, lines 7-8) (R. p. 5, lines 1-2) (R. p. 6, lines 22-23) (R. p. 7, lines 1, 3-9) (R. p. 15, line 4) (R. p. 20, lines 13-21) (R. p. 29, lines 3-13) (R. p. 30, lines 1-15) (R. p. 31, lines 6-16, 20-22) (R. p. 32, lines 1-16, 26-28) (R. p. 33, lines 1-5) (R. p. 91, lines 1-5) (R. p. 95, lines 1-25) (R. p. 96, lines 1-10) (R. p. 97, lines 15-19) (R. p. 99, lines 3-25) (R. p. 100, lines 1-11) (R. p. 101, lines 1-25) (R. p. 102, lines 1-15) (R. p. 103, lines 1-25) (R. p. 104, lines 1-25) (R. p. 139, lines 12-20) (R. p. 145, lines 1-12) (R. p. 151, lines 15-25) (R. p. 152, lines 1-25) (R. p. 153, lines 1-17) (R. p. 154, lines 1-25) (R. p. 155, lines 1-13) (R. p. 187, lines 13-25) (R. p. 188, lines 1-13) (R. p. 189, lines 12-25) (R. p. 190, lines 1-25) (R. p. 191, lines 1-2) (R. p. 192, lines 21-25) (R. p. 193, lines 1-2) (R. p. 195, lines 24-25) (R. p. 196, lines 1-20) (R. p. 197, lines 18-25) (R. p. 198, lines 1-21) (R. p. 199, lines 1-19) (R. p. 200, lines 24-25) (R. p. 201, lines 1-8) (R. p. 202, lines 1-22) (R. p. 203, lines 2-25) (R. p. 204, lines 1-12) (R. p. 205) (R. p. 210) (R. p. 211) (R. p. 212) (R. p. 213) (R. p. 214) (R. p. 215) (R. p. 216) (R. p. 222, lines 4-50) (R. p. 223, lines 15-18) (R. p. 224) (R. p. 225) (R. p. 253, lines 11-26) (R. p. 255, lines 11-26) (R. p. 256, lines 1-3, 4-25) (R. p. 257, lines 3-25) (R. p. 268, lines 14-18)

5.) The Appellant's MOTION dated February 27, 2012

(R. p. 156, lines 12-25) (R. p. 157, lines 1-25) (R. p. 244, lines 6-11, 15-25) (R. p. 246) (R. p. 250, lines 18-23) (R. p. 253, lines 1-7, 11-26) (R. p. 255, lines 1-7) (R. p. 256, lines 1-25) (R. p. 258) (R. p. 259) (R. p. 260) (R. p. 261) (R. p. 262) (R. p. 263, lines 12, 27-28) (R. p. 264)

The Appellant is respectfully requesting that this issue be addressed and determined at the STATE OF SOUTH CAROLINA Court of Appeals. As it relates to the South Carolina Workers' Compensation Commission Hearing with Commissioner Avery B. Wilkerson, Jr. on April 18, 2012, it is of note that Commissioner Wilkerson did not have jurisdiction to hear and or make a ruling in this case. It is also of note that Commissioner Wilkerson appeared to make special efforts to involve himself in this matter for which the **South Carolina Workers' Compensation Commission DECISION AND ORDER** issued by Commissioner Wilkerson **lacked fairness and a Hearing of impartiality**.

- 6.) The Claimant is respectfully requesting reimbursement for expenses as it would relate to the single Commissioner (Avery B. Wilkerson, Jr.) April 18, 2012 South Carolina Workers' Compensation Commission Hearing and the COMMISSION REVIEW panel Hearing on September 18, 2012. These expenses reimbursement request is for ,but not limited to, the Claimant's filing fees, photocopying fees, mailing and postage fees, the Claimant's transportation to and from the Hearings as it relates to this STATE OF SOUTH CAROLINA Court of Appeals process and the previous South Carolina Workers' Compensation Commission two (2) Hearings on April 18, 2012 and September 18, 2012.

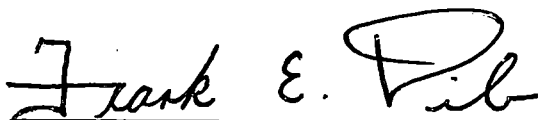
(R. p. 158, lines 1-25) (R. p. 159, lines 1-25) (R. p. 160, lines 1-25) (R. p. 253, lines 1-7, 11-26) (R. p. 255, lines 1-7) (R. p. 256 lines 1-25) (R. p. 258) (R. p. 259) (R. p. 260) (R. p. 262) (R. p. 263, lines 12, 27-28) (R. p. 264) (R. p. 265) (R. p. 266, lines 1-16) (R. p. 267, lines 12-21, 25-32) (R. p. 268, lines 1-7, 30-32) (R. p. 269, lines 1-10)

CONCLUSION

For the reasons stated, this Court should reverse the judgment of the circuit court.

Respectfully submitted,

August 21, 2015



Frank E. Wilson
8755 Jessica Court
North Charleston, SC 29406
(843) 327-9616
Appellant

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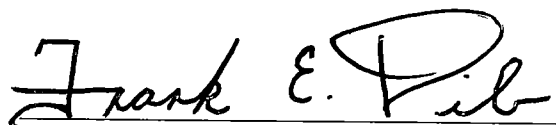
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Respondent,

CERTIFICATE OF APPELLANT

The undersigned certified that this Final Brief complies with Rule 211 (b), SCACR.

August 21, 2015



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Appellant

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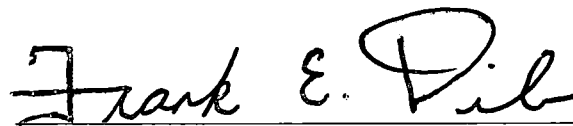
v.

American LaFrance, Employer, and AIG C/O Gallagher Bassett Services, Inc.,
Carrier, Respondent,

PROOF OF SERVICE

I certify that I have served the revised FINAL BRIEF OF APPELLANT on American LaFrance, Employer, and AIG C/O Gallagher Bassett Services, Inc., Carrier by depositing a copy of it in the United States Mail, postage paid, on August 20, 2015, addressed to the attorneys of record, Erin L. Hantske and Helen F. Hiser, Post Office Box 650007, Mount Pleasant, SC 29465.

August 21, 2015



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Appellant