

July 21, 2017

Honorable Justice James E. Lockemy
Jeanette Kitchings, Honorable Clerk of Court
PO Box 11629
Columbia, SC 29211

Atty. James Goudelock and Atty. Helen Hiser
PO Box 12519
Columbia, SC 29211-2519

Clarence B. Jenkins Jr.
945 Wire Rd.
Neeses, SC 29107

RECEIVED

JUL 25 2017

SC Court of Appeals

REF: 2016-000598 Clarence B. Jenkins Jr., Employee, Appellant vs. Amazon.Com
DEDC LLC, Employer, and American Zurich Ins. Co. Carrier.
Respondents.

A STATEMENT OF DECLARATION

Ms. Kitchings:

I am affirming that South Carolina Worker's Compensation Commission (Herein after SCWCC) and South Carolina Court of Appeals has applied a DOUBLE STANDARD to benefit Respondents which is not lawful according to South Carolina Code of Laws. South Carolina Court of Appeals has blatanly shown their bias and prejudice against Appellant. Respondents, SCWCC and South Carolina Court of Appeals has firmly stated that only contents in pre-hearing (form 58) is only allowed in Brief, Designation of Matter and Record of Appeal must be held to that standard filed with SCWCC dated May 11, 2015. In my review of Respondent's pre-hearing brief (form 58) dated May 21, 2015 to SCWCC, it was discovered that specific documentations

requested to be enter into the Record on Appeal is distortions (LIES) upheld by South Carolina Court of Appeals.

The May 11, 2015 pre-hearing brief (form 58) filed by Respondents does not include twitter and facebook accounts as an evidentiary exhibit by Appellant but was allowed by SCWCC and upheld by South Carolina Court of Appeals which is unlawful (A DOUBLE STANDARD). Respondents also included on their May 11, 2015 pre-hearing brief (form 58) that extensive emails from Appellant to them as an evidentiary exhibit but was not allowed by SCWCC and upheld by South Carolina Court of Appeals which is unlawful (A DOUBLE STANDARD). The evidence of the distortions (LIES) by Respondents and SCWCC upheld by South Carolina Court of Appeals is in their pre-hearing brief (form 58) dated May 11, 2015. I have include the pre-hering brief (form 58) by Respondents for review to verify this blatant corruption taken place in the court of law. Furthermore a portion of transcript from May 21, 2015 hearing at SCWCC addressed the concerns of a DOUBLE STANDARD by Appellant before Comm. Michael Campbell II..

South Court of Appeals and SCWCC has blantanly denied due process because of DOUBLE STANDARD and ABUSE. SCWCC R67-611 was complete and deliberate violation of law. Furthermore R67-611(1) states that a pre-hearing brief (form 58) must be served at least 10 days before scheduled hearing. Respondents mailed pre-hearing brief (form 58) by United States Postal Mail on May 11, 2015 therefore with travel time did not fulfilled R67-611(1) with a scheduled hearing on May 21, 2015. I have included a copy of envelope received from Respondents for verification.

The ORDER dated July 13, 2017 by Chief Justice, James E. Lockemy is abuse of the process. I have every intent of seeing that justice is fulfill in spite of intentional barriers to deny. Please filed as A STATEMENT OF DECLARATION for the record

July 21, 2017



Clarence B. Jenkins Jr.
Clarence B. Jenkins Jr.
945 Wire Rd.
Neeses, SC 29107
(803) 263-4514
Pro Se Appellant



Claimant's Name: Clarence B. Jenkins SSN: 248-41-1391
Address: 945 Wire Road, Neeses, SC 29107
Home Phone: _____ Work Phone: (803) 791-6542
Preparer's Name: J. Russell Goudelock, II

Employer's Name: Amazon.com DEDC, LLC [CAE1]
Address: 7200 Discovery Drive, Chattanooga, TN 37421
Carrier: Insurance Company of the State of Pennsylvania
Preparer's Phone #: (803) 227-2222

A claim for workers' compensation benefits is made based on the following grounds:

Injury Illness Repetitive Trauma

1. Comp. Rate: \$326.08 2. AWW: \$489.09 Date of Injury: 02/10/13
3. Type of injury and body part(s): ALLEGED headaches, eyes, neck, legs and feet.
4. Facts in controversy: Did Claimant sustain any compensable injury(ies) by accident arising out of and in the course of his employment to the extent alleged in Form 50? Has Claimant been incapable because of injury from earning the same or similar wages? Is Claimant entitled to payment of any temporary total disability benefits (Form 50 seeks payment dates 04/22/13-09/23/13 and 01/22/14 to present)? Is Claimant entitled to payment of any permanent disability benefits (Form 50 seeks General Disability)? Is Claimant entitled to any additional medical treatment and/or medical evaluation?
5. Legal issues involved: S.C. Code Ann. Sections 42-1-120, 42-1-160, 42-9-10, and 42-15-60; other applicable statutes, regulations and case law.
6. Unusual aspects: Defendants have furnished Claimant with appropriate medical treatment and/or evaluation to the extent potentially caused by work injury. Claimant's current medical condition, if any, is not because of any compensable work injury. Defendants reserve the right, and may move, to postpone or adjourn the scheduled hearing to exercise due process rights afforded by the S.C. Administrative Procedures Act, and other applicable law, to cross-examine, respond to and/or otherwise oppose evidence presented by Claimant.
7. Witnesses (designate if expert):* Claimant; Michael Sarnina; Kelley Wells, RN; Alicia Keisler and/or other representative(s) from Employer; see no. 6 above.
8. Exhibits: Relevant employment personnel records from Amazon; transcript of Claimant's deposition testimony (June 17, 2013); relevant employment personnel records from Voorhees College [submitted pursuant to APA]; relevant unemployment compensation records from S.C. Dept. of Employment and Workforce [submitted pursuant to APA]; extensive emails, in whole or in part, from Claimant to Defendants may be submitted; see no. 6 above.
9. Medical evidence (indicate report pursuant to R.67-61.2; deposition or appearance): See Defendants' Notice (May 11, 2015); transcript of deposition testimony of David E. Stickler, M.D. (January 15, 2015); see no. 6 above.
10. Name, address, and specialty, if any, of the treating physician: Palmetto Health HealthWorks, Columbia, SC, occupational medicine.
11. Impairment rating(s); body part(s); physician and date of opinion: None.
12. I am amending my Form 50/51 in the following manner: Defendants join in Claimant's request for hearing and seek determinations that Claimant has reached maximum medical improvement and no further medical benefits or any temporary or permanent disability compensation benefits are owed to the Claimant.

Mediation

- a. Mediation is requested to be ordered pursuant to Reg. 67-1801 B.
- b. Mediation is required pursuant to Reg. 67-1802.
- c. Mediation is requested by consent of the Parties pursuant to Reg. 67-4803.
- d. Mediation has been conducted by a duly qualified mediator and resulted in an impasse.

Questions regarding mediation may be submitted to mediation@wcc.sc.gov.

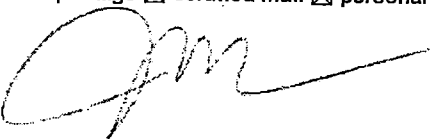
I verify the contents of this form are accurate and true to the best of my knowledge.

I certify I have served this document pursuant to Reg. 67-211 by delivering a copy to Clarence B. Jenkins

address 945 Wire Road, Neeses, South Carolina 29107

on the 11th **day of** May **20** 15.

by first class postage certified mail personal service.

Signature: 
Date of Hearing: May 21, 2015

Email: rgoudelock@mgclaw.com
Time needed for hearing: 1.5 hours

Questions about the use of this form should be directed to the Jurisdictional Commissioner. Refer to Regulations 67-204 through 67-211, 67-211, and Regulations 67-601 through 67-615; as well as Reg. 67-1801. File this form and proof of service on the opposing party according to R.67-611 and R.67-212. Do not send medical reports. *Commissioners reserve the right to admit expert witnesses at hearings.

SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

W.C.C. FILE NO: 1303989

CLARENCE B. JENKINS,

Employee,

Claimant,

vs.

AMAZON.COM.DEDC, LLC,

Employer,

AND

INSURANCE COMPANY OF THE STATE
OF PENNSYLVANIA C/O SEDGWICK
CLAIMS MANAGEMENT SERVICES,
INC.,

Carrier,

Defendants.

**NOTICE OF WITNESSES AND
WRITTEN MEDICAL REPORTS
TO BE INTRODUCED AS
DIRECT EVIDENCE ON BEHALF
OF DEFENDANT**

TO: SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION AND
CLARENCE B. JENKINS, *PRO SE* CLAIMANT:

YOU ARE NOTIFIED that the Defendants, pursuant to the provisions of the South Carolina Workers' Compensation Act and Section 1-23-330 of the South Carolina Code of Laws (Cum. Supp. 1988) submit the following medical records and other documents as evidence:

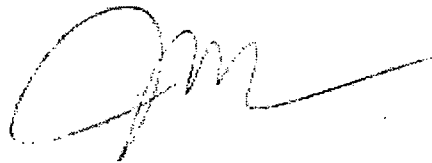
APA#	DOCTOR	PRACTICE	DATES	PAGES
1.	David Stickler, M.D.	Neurology Specialists of Charleston	8/28/14	1-3
2.	Mahmoud Abu-Ata, M.D.	The Neurology and Pain Clinic	8/26/13-2/21/14	4-13
3.	Charles S. Jervey, M.D.	Carolina Neurological Clinic	11/19/13	14-15
4.		Palmetto Health Richland	4/15/13-8/9/13	16-26
5.		Palmetto Health Health Works	2/14/13-4/15/13	27-48
6.		AmCare	2/10/13	49-53
	EXHIBITS			

7.	Portions of employment personnel records from Vorhees College	10/16/99-10/14/09	54-101
8.	Portions of SC Dept. of Employment Workforce records, including relevant excerpts from SCDEW Hearing Transcript dated 2/5/2007	12/13/06-12/12/11	102-218
9.	Deposition transcript of David Stickler, M.D.	01/15/15	

YOU ARE FURTHER NOTIFIED that you have the right to cross-examine or otherwise oppose this evidence and, should you desire to exercise this right, you are to promptly schedule the deposition of any provider whose records are submitted, for the purposes of cross-examination, or otherwise promptly submit opposing medical records into evidence.

YOU ARE FURTHER NOTIFIED that these records, or photocopies of the same, will be provided to the South Carolina Workers' Compensation Commission for insertion in their file and for consideration as evidence on behalf of the Defendants.

YOU ARE FURTHER NOTIFIED that the following witnesses may be called on behalf of the Defendants: Claimant; Michael Sarnina; Kelley Wells, RN; Alicia Keisler and/or other representative(s) from Employer.



J. RUSSELL GOUDELOCK, II
MCANGUS GOUDELOCK & COURIE, L.L.C.
Post Office Box 12519, Capitol Station
Meridian, 1320 Main Street, 10th Floor
Columbia, South Carolina 29211-2519
(803) 779-2300
Attorneys for the Employer/Carrier

Columbia, South Carolina
May 11, 2015

SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

W.C.C. FILE NO: 1303989

CLARENCE B. JENKINS,

Employee,

Claimant,

vs.

AMAZON.COM.DEDC, LLC,

Employer,

AND

INSURANCE COMPANY OF THE STATE OF
PENNSYLVANIA C/O SEDGWICK CLAIMS
MANAGEMENT SERVICES, INC.,

Carrier,

Defendants.

CERTIFICATE
OF
SERVICE

The undersigned certifies that she is an employee at MCANGUS GOUDELOCK & COURIE, and that she has served, on the date set forth below, a copy of the document described below, in the above entitled action to the following persons, pursuant to Section 15-9-930 and Section 15-9-940 of the Code of Laws of South Carolina, 1976, by depositing a copy of same in the United States Mail, postage prepaid, addressed to:

TO:

Via Personal Service and Certified Mail

Clarence B. Jenkins
945 Wire Road
Neeses, South Carolina 29107

VIA eCase

S. C. WORKERS' COMPENSATION COMMISSION
1333 Main Street, Suite 500
Columbia, South Carolina 29201

DOCUMENT:

Pre-Hearing Brief and Notice of Witnesses and Written Medical Reports

DATE OF
MAILING:

May 11, 2015



Cheryl A. Joiner
Secretary to J. Russell Goudelock, II

Requested Documentations

Sunday, July 16, 2017 10:18 PM

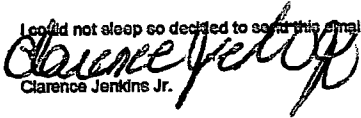
From: "Clarence Jr" <upscale81@yahoo.com>

To: "Rusty Goudelock" <rgoudelock@mgclaw.com> helen.hiser@mgclaw.com

Atty. James Goudelock and Atty. Helen Hiser:

I am requesting those documents listed that is not included in my Record On Appeal on your March 23, 2017 Motion to SC Court of Appeals. In that response it was stated that MG&C would provide those documents per my request so a request is being made. I will review after receiving those documents and compare it with your pre-hearing brief filed on May 11, 2015 to determine appropriate filings. I would also like to know August 25, 2015 filing is with or without documents according to your understanding. Because remembered sending documentations with August 25, 2015 filing. I will also notify the SC Court of Appeals of this request. Please send a response to all.

I could not sleep so decided to send this email.



Clarence Jenkins Jr.

Verification of Fraudulent Intent (seperate response/action from currently worker's comp case on appeal)

Monday, July 17, 2017 9:51 AM

From: "Clarence Jr" <upscale81@yahoo.com>

To: "Rusty Goudelock" <rgoudelock@mgclaw.com> "Fern Potter" <FPotter@mgclaw.com> jeffbezos@amazon.com
"gcannon@wcc.sc.gov" <gcannon@wcc.sc.gov> keroberts@wcc.sc.gov more ...

4 Files 2 MB Download All
JPG 1016KB JPG 526KB JPG 610KB JPG 424KB

Save Save Save Save

All:

I recently found therefore providing attachments of pre-hearing brief (form 58) by Amaon.Com and American Zurich to SCWCC dated May 11,2015 which verifies their corruption and SCWCC. The pre-hearing brief submitted to SCWCC does not include all those documentations that has been distorted to SC Court of Appeals as being filed and presented to claimant as lawful . I have been held to a double standard with regards to pre-hearing brief that was not applied to Amazon.Com and American Zurich. Defendants was allowed to present twitter and facebook accounts and others that is not included on their pre-hearing brief that was upheld SCWCC Appellate Panel and S.C Court of Appeals. Claimant was denied emails from claimant to Defendants that was listed on their pre-hearing brief. Claimant was denied medical records and disability records even though listed on his pre-hearing brief. The SCWCC Commissioners are complete incompetent I have attached documents for verification of your own corruption and LIES. A request has already been made to Atty. Goudelock and Atty. Hiser to provide documents that has been selected by them to no be included in Appellant's Record On Appeal.

I will be seeking an alternative legal action to seek justice against all since it is impossible at SCWCC and other even though currently filed with SC Court of Appeals.


Clarence Jenkins Jr.

Clarification needed

Tuesday, July 18, 2017 8:12 PM

From: "Clarence Jr" <upscale81@yahoo.com>

To: "Rusty Goudelock" <rgoudelock@mgclaw.com> helen.hiser@mgclaw.com

Atty. Goudelock and Atty. Hiser:

I have received copies of requested information on today by UPS but is confused and needs clarification. Please states as to whether my twitter and facebook account was listed on your pre-hearing brief (form 58) dated May 11, 2015 and if not it was illegal. The pre-hearing brief (form 58) dated May 11, 2017 in my possession does not it dated May 11, 2017 Please states as to #16 was submitted with or without attachments because according to my verification it was supported with documentations. Please provide a response by Thursday (July 20, 2017).

I also want to provide clarification to your letter dated July 17, 2017 stating that a formal request had not been received from me requesting documentations. A formal request for documentations was made on July 16, 2017 so the previous statement is false. Please review email that was sent July 16, 2017. Notification will be sent to SC Court of Appeals. Please send a response by email or postal mail.



Clarence Jenkins Jr

Documents stated on pre-hearing brief

Wednesday, July 19, 2017 9:51 AM

From: "Clarence Jr" <upscale81@yahoo.com>

To: "Rusty Goudelock" <rgoudelock@mgclaw.com> helen.hiser@mgclaw.com

Atty. Goudelock and Atty. Hiser:

Please submit a response to confirm that claimant's twitter and facebook account was listed on pre-hearing brief (form 58) from amazon.com dated May 11, 2015. Please confirm that #16 as provided in your letter dated July 17, 2017 was submitted without attachments. Notifications will be provided to the court. Please provide a response by Thursday.


Clarence Jenkins Jr.

Requesting A Response

From: "Clarence Jr" <upscale81@yahoo.com>

Wednesday, July 19, 2017 10:05 PM

To: "Rusty Goudelock" <rgoudelock@mgclaw.com> helen.hiser@mgclaw.com

Atty. Goudelock and Atty. Hiser:

I sent an email requesting a simple response by Thursday regarding defendants pre-hearing brief (form 58) dated May 11, 2015. The response does not required a lot of detail information but a simple yes or no.

1. Did defendants pre-hearing brief (form 58) dated May 11, 2015 listed claimant's twitter account as evidence?
2. Did defendants pre-hearing brief (form 58) dated May 11, 2015 listed claimant's facebook account as evidence?
3. Did claimant's motion dated August 24, 2015 include exhibits as attachment because your information has stated no?

Please send a response because of confusion so that Record On Appeal can be completely with accuracy.

Clarence Jr
 Clarence Jenkins Jr

Responses Needed

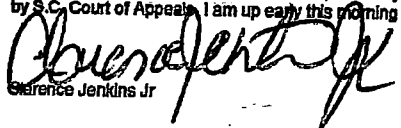
Thursday, July 20, 2017 7:12 AM

From: "Clarence Jr" <upscale81@yahoo.com>

To: "Rusty Goudelock" <rgoudelock@mgclaw.com> helen.hisar@mgclaw.com

Atty. Goudelock and Atty. Hisar:

I forgot to mention in my last email due to memory lapse regarding emails from claimant to defendants. Please provide a simple yes or no as to claimant's email to defendants and others previously mentioned was stated on your pre-hearing brief (form 58) dated May 11, 2015 which has been denied by S.C. Court of Appeals. I am up early this morning because of several reasons for one not able to sleep.


Clarence Jenkins Jr

Case#2016-000598

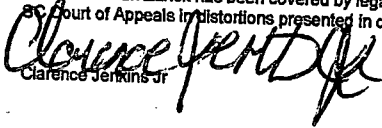
Thursday, July 20, 2017 7:59 PM

From: "Clarence Jr" <upscale81@yahoo.com>

To: "Rusty Goudelock" <rgoudelock@mgclaw.com> helen.hiser@mgclaw.com

Atty. Goudelock and Atty. Hiser:

I have requested a response to four questions regarding Respondents' pre-hearing brief (form58) dated May 11, 2015 since July 16, 2017 and has not received your reply. I will consider your non-reply as a yes therefore an admission to the following questions submitted for a response. Amazon.Com and American Zurich has been covered by legal representation, legal representation has been covered by SCWCC and SCWCC has been covered by SC Court of Appeals in distortions presented in case# 2016-000598.


Clarence Jenkins Jr

Clarence B. Gert Jr
945 Wie Rd
Neeses, SC 29107

COLORED
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24 JUL
PM 11



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U.S. POSTAGE
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RECEIVED

JUL 25 2017

SC Court of Appeals

SC Court of Appeal
PO Box 11629
Columbia, SC 29211
Attn: James E. Lockery, Chief Justice

29211-162929

