

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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W.C.C. File No.: 1303989

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Clarence B. Jenkins, Employee, .....Appellant,

v.

Amazon.Com DEDC, LLC, Employer, and  
American Zurich Ins. Co., Carrier, ..... Respondents.

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**RETURN IN OPPOSITION TO  
DECLARATION**

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AUG 07 2017

**SC Court of Appeals**

Pursuant to Rule 240, SCAC, Respondents Amazon.Com DEDC, LLC and Zurich Ins. Co. file this Return in Opposition to Appellant Clarence B. Jenkins Jr.'s Declaration dated July 31, 2017. First, as was the case with his previous Statement of Declaration, it is unclear whether any response is necessary because Appellant has not submitted any filing fee with his Declaration and it is unclear exactly what relief he seeks.

Second, and out of an abundance of caution, Respondents repeat that, during initial briefing before this Court, Appellant has not objected to the items included in Respondents' Designation of Matter. Instead, he simply filed his Initial Reply Brief. As a result, his time to object has passed. The reference to the May 21, 2015 hearing before Commissioner Campbell in Respondents' July 25, 2017 Return was in response to Appellant's meritless allegation that he was not timely served with Respondents' Pre-Hearing Brief.

**CONCLUSION**

Instead of complying with this Court's May 11, 2017 and July 17, 2017 Orders, Appellant continues to submit meritless filings causing needless delay and expense. As was requested in their recently-filed Second Motion for Correction of the Record on Appeal, Respondents request that this Court either order Appellant to file the complete Record on Appeal as ordered, or dismiss his appeal.

Respectfully submitted,

August 4, 2017

**McANGUS GOUDELOCK & COURIE LLC**



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Helen F. Hiser, S.C. Bar No.: 76124  
735 Johnnie Dodds Blvd., Suite 200 (29464)  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Respondents Amazon.Com DEDC, LLC  
and American Zurich Ins. Co.*

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**PROOF OF SERVICE**

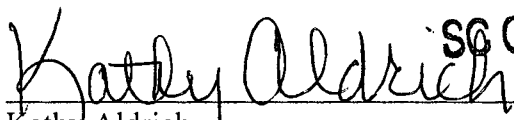
I certify that on the 4th day of August 2017, I served the Respondents' **Return in Opposition to Declaration** on Clarence B. Jenkins, *pro se*, by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

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

**RECEIVED**

AUG 07 2017

SC Court of Appeals

  
Kathy Aldrich

Legal Assistant to Helen F. Hiser  
McAngus, Goudelock & Courie LLC  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Respondents Amazon.Com DEDC,  
LLC and Zurich Ins. Co*



**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

August 4, 2017

**Via U.S. Mail**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Clarence B. Jenkins v. Amazon.com and Insurance Company of the State  
of Pennsylvania c/o Sedgwick Claims Management Services, Inc.  
Date of Accident: February 10, 2013  
WCC File No.: 1303989  
Our File No.: 20194.13164  
Claim No.: 30130262998  
Appeal No.: 2016-000598

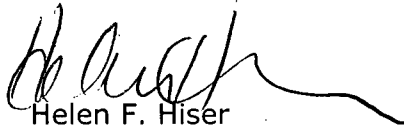
Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondents' Return in Opposition to Declaration, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the self-addressed, stamped envelope.

If you have any questions, please do not hesitate to contact me.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

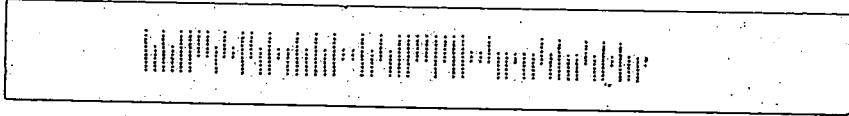
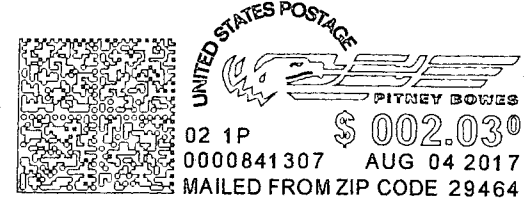
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SC Court of Appeals

Enclosures

cc: Clarence B. Jenkins, *pro se*



**mgc** | **INSURANCE  
DEFENSE**

POST OFFICE BOX 12519  
MT. PLEASANT, SC 29465

**20194.13164/HFH/kea**  
The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

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