

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

W.C.C. File No.: 1303989

RECEIVED
AUG 16 2017
SC Court of Appeals

Clarence B. Jenkins, Employee,Appellant,

v.

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

**RETURN IN OPPOSITION TO
APPELLANT'S THIRD DECLARATION**

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 third Declaration dated August 3, 2017 and received August 14, 2017.¹ First, as was the case with his previous Declarations, 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 object to Appellant's unfounded allegations of criminal conduct. Appellant still has not shown that the binders of material he unsuccessfully attempted to present to the Commission at the May 21, 2015 Single Commissioner hearing were ever accepted or reviewed by the Commission. In fact, at this point in time, no one can definitively say what was in those binders. To the extent Appellant

¹ Although it appears that Appellant first attempted to mail the third Declaration to Respondents on August 3, 2017, that mailing was returned to him. He called the undersigned to clarify the address, and then re-mailed his third Declaration on August 8, 2017. (Exh. A).

previously designated any of the documents attached to the Form 50 served by the Commission on October 13, 2014, Respondents have no objection to their inclusion in the Record on Appeal. However, that does not alter the fact that Appellant still has not submitted a complete Record on Appeal in this case.

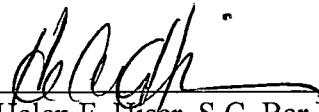
CONCLUSION

Again, instead of complying with this Court's May 11, 2017 and July 17, 2017 Orders, Appellant continues to submit declarations making unfounded accusations. As was requested in their recently-filed Second Motion for Correction of the Record on Appeal and Return in Opposition to Declaration, Respondents request that this Court either order Appellant to file the complete Record on Appeal as ordered, or dismiss his appeal.

Respectfully submitted,

August 14, 2017

McANGUS GOUDELOCK & COURIE LLC



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.*

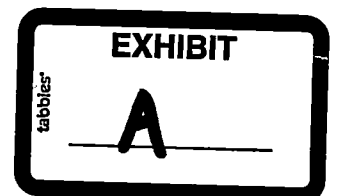
Helen Hiser

From: Clarence Jr <upscale81@yahoo.com>
Sent: Tuesday, August 08, 2017 11:08 AM
To: Helen Hiser; Rusty Goudelock
Subject: REF# 2016-000598

Atty. Hiser and Atty. Goudelock:

I spoke to you on yesterday regarding a documentations that was returned because of wrong address due to poor eyesight and memory problems. I have remailed the documentations on today to correct address. A copy was sent to SC Cort of Appeals in original mailing

Clarence Jenkins Jr



Clarice Ventry
945 White Rd
Reese, SC 29107

120

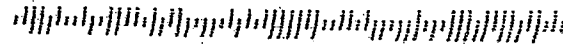
COLUMBIA, SC 29909

AUG 03 2017 9:41 L

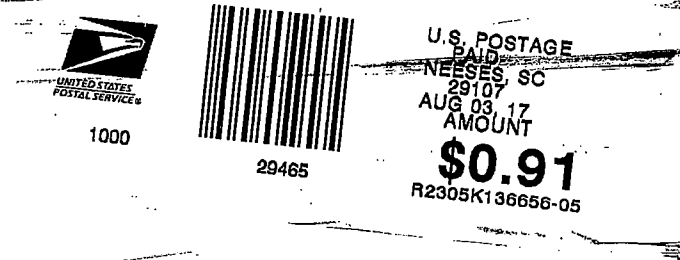


Atty. Helen Hoyer & Atty. James Condit
PO Box 650002
Mt. Pleasant, SC 29465

29465-650707



Clarice Ventry
945 White Rd
Reese, SC 29107



Atty. Helen Hoyer
PO Box
Mt. Pleasant
Atty. James Condit
29465



NO SUCH NUMBER
PLEASE RE 29464-9458

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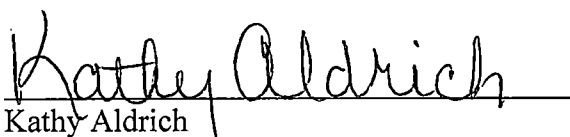
v.

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

PROOF OF SERVICE

I certify that on the 14th day of August 2017, I served the Respondents' **Return in Opposition to Appellant's Third 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



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*

mgc

Reply To

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

August 14, 2017

Via U.S. Mail

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

RECEIVED
AUG 16 2017
SC Court of Appeals

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 Appellant's Third 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

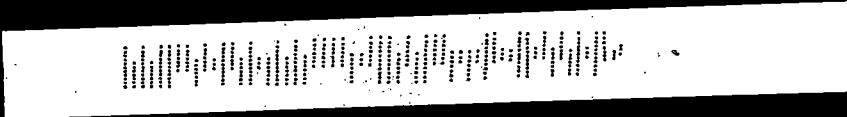

Helen F. Hiser

Enclosures

cc: Clarence B. Jenkins, *pro se*



UNITED STATES POSTAGE
 PITNEY BOWE
 02 1P \$ 002.45
 0000841307 AUG 14 201
 MAILED FROM ZIP CODE 2946



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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