

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 17 2017  
SC Court of Appeals

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

v.

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

**REPLY TO APPELLANT'S OPPOSITION TO  
MOTION FOR CORRECTION OF  
THE RECORD ON APPEAL**

Pursuant to Rules 210 and 240, SCAC, Respondents Amazon.Com DEDC, LLC and Zurich Ins. Co. reply to Appellant Clarence B. Jenkins' opposition to their Motion for Correction of the Record on Appeal ("Motion"). Although Appellant voiced objections to the Hearing Commissioner at the May 21, 2015 hearing, both the Twitter account and Facebook account were admitted into the Commission record. (Exh. C to Motion, Hr'g Tr. p. 65, lines 16-18; p. 68, lines 21-23). While Appellant is free to argue that this was error, he is not free unilaterally to decide simply to not include them in the Record on Appeal, as they undeniably were accepted as part of the Commission record. Neither Appellant's December 16, 2016, "A Motion to Declare a Violation of Rule 4.1 and Rule 8.4 by Legal Counsel for Respondents," nor his December 27, 2016 letter to this Court concerning the same objected to inclusion of these materials in the Record on Appeal. Furthermore, Appellant has provided no explanation as to why he has failed

to include pages 69-82 and 90-107 of the Transcript of the May 21, 2015 Hearing before Commissioner Campbell.

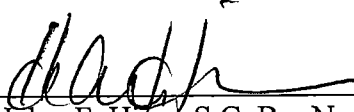
**CONCLUSION**

Respondents request the Court to order Appellant to correct the Record on Appeal as indicated in their Motion or, in the alternative, dismiss the pending appeal. Respondents also request that the briefing schedule be suspended until the Court rules on their Motion.

Respectfully submitted,

August 15, 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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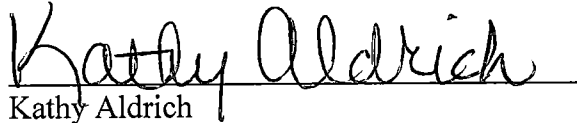
AUG 17 2017

**SC Court of Appeals**

**PROOF OF SERVICE**

I certify that on the 15th day of August 2017, I served the Respondents' **Rely to Appellant's Opposition to Motion for Correction of the Record on Appeal** 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 15, 2017

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AUG 17 2017

**SC Court of Appeals**

**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' Reply to Appellant's Opposition to Motion for Correction of the Record on Appeal, 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,

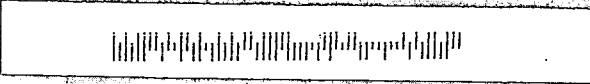
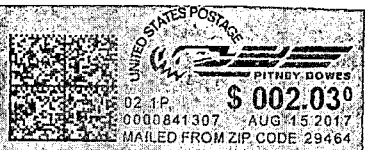
McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: Clarence B. Jenkins, *pro se*



**mgc** | INSURANCE  
DEFENSE

POST OFFICE BOX 12519  
MT. PLEASANT, SC 29465

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AUG 17 2017  
SC Court of Appeals

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