

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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**RECEIVED**  
JAN 22 2018  
SC Court of Appeals

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  
APPELLANT'S REQUEST FOR AN EXTENSION OF TIME**

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Pursuant to Rule 240, SCACR, Respondents Amazon.Com DEDC, LLC and Zurich Ins. Co. file this Return in Opposition to Appellant Clarence B. Jenkins Jr.'s December 28, 2017 letter Request for an Extension of Time. As this Court noted on January 5, 2018, Appellant failed to submit both a proof of service and the required \$25.00 motions filing fee with his request. Although Appellant submitted a proof of service within the 10 days specified in the Court's January 5 letter, he has not submitted the filing fee. This Court should deny Appellant's request on that basis alone.

In addition, with respect to the substance of Appellant's request, the items designated by both parties to be included in the Record on Appeal total less than 450 pages, not 10,000 pages. Furthermore, Appellant's allegations of harassment and "deliberate distortions" are baseless and unfounded, despite Appellant's belief otherwise.

**CONCLUSION**

For the reasons stated herein, Respondents respectfully request that this Court deny Appellant's request for an extension of time to file the Record on Appeal in this matter.

Respectfully submitted,

January 17, 2018

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

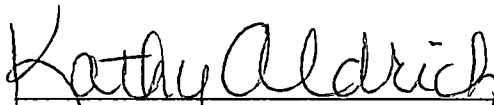
v.

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

**PROOF OF SERVICE**

I certify that on the 17th day of January 2018, I served the Respondents' **Return in Opposition to Appellant's Request for an Extension of Time** 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*



**Reply To**

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

January 17, 2018

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JAN 22 2018  
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' Return in Opposition to Appellant's Request for an Extension of Time, 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,

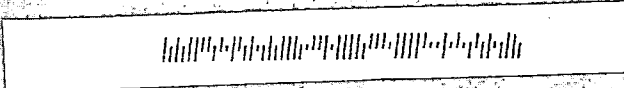
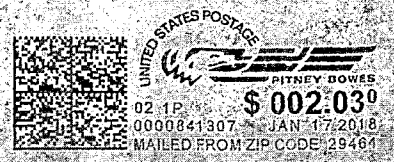
McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: Clarence B. Jenkins, *pro se*



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

POST OFFICE BOX 12518  
MT. PLEASANT, SC 29465

**RECEIVED**  
JAN 22 2018  
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