

IN THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM SOUTH CAROLINA WORKER'S COMPENSATION
FULL APPELLATE PANEL

Case No. 2016-000598

Clarence B. Jenkins Jr., Employee, Appellant,

v.

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

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APPELLANT'S MOTION ADDITIONAL RESPONSE

SEP 21 2017

SC Court of Appeals

Appellant has constantly and consistently stated that Amazon.Com DEDC LLC,
American Zurich Insurance Co and South Carolina Worker's Compensation Commission
(Herein after SCWCC) violated a self represented claimant rights at May 21, 2015
hearing and December 14, 2015 hearings requiring a pre-hearing brief which is not
lawful according to R67-611.

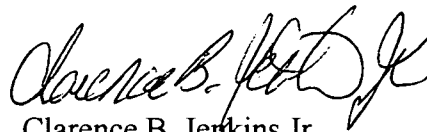
At March 12, 2014 SCWCC Hearing presided by Andrea C. Roche, former
commissioner of SCWCC provided instructions. Accordingly to March 12, 2014 hearing
transcript on page six (6) lines 23-25 and page seven (7) line 1 as stated by the Andrea C.
Roche, former commissioner of SCWCC for the COURT that:

THE COURT: - - and you have other body parts that you think are causally related then you'll need to file another 50 and get another hearing. You'll have to bring your evidence. See attachments p. six (6) and p. seven (7)

Appellant did as instructed by Andrea C. Roche, former commissioner of SCWCC and R67-611 which has been expressed to S.C. Court of Appeals. By denying a self represented claimant submission of pertinent documents at May 21, 2015 and December 14, 2015 hearings is a willful and deliberate violation of SCWCC Law R67-611 by Amazon.Com DEDC LLC, American Zurich Ins. Co. and SCWCC.

WHEREFORE, Appellant request this COURT issued a direct order of Reversal due to a willful, deliberate and corrupt effort of Respondents violating R67-611. Furthermore, direct instructions of Andrea C. Roche, former commissioner of SCWCC to Appellant was willfully violated.

September 20 2017



Clarence B. Jenkins Jr.
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1 THE COURT: Okay. So they have admitted
2 headaches --

3 MR. JENKINS: Right.

4 THE COURT: -- so we're not here today to
5 determine whether or not there are any other body
6 parts related to your accident other than headaches,
7 so that's all they've admitted at this time.

8 MR. JENKINS: Right.

9 THE COURT: And I don't know if you're claiming
10 that you have more problems as a result of the
11 accident or not; I don't know. That's not why we're
12 here.

13 MR. JENKINS: Right.

14 THE COURT: We're here about mileage.

15 MR. JENKINS: Yes.

16 THE COURT: So I am going to let them in.

17 MR. JENKINS: Okay.

18 THE COURT: I'm going to let these records in in
19 general, but we're not here today for determination of
20 what's causally related to your accident. Okay? If
21 you want that determination made eventually --

22 MR. JENKINS: Yes.

23 THE COURT: -- and you have other body parts that
24 you think are causally related then you'll need to
25 file another 50 and get another hearing. You'll have

1 to bring your evidence.

2 MR. JENKINS: Okay. Okay.

3 THE COURT: Okay?

4 MR. GOUDELICK: Your Honor, if you'd like if --
5 if -- I think you said those were the only copies you
6 had?

7 MR. JENKINS: Yes, sir.

8 MR. GOUDELICK: I mean I -- at -- at the
9 conclusion I'm happy to make copies of those and
10 supply a copy to you as well as give his originals
11 back to him if that helps you having his originals in
12 your file -- so -- if he agrees with that and you want
13 us to.

14 THE COURT: All right. Mr. Jenkins has submitted
15 to me a mileage reimbursement sheet that he -- and
16 this is all you're claiming, right?

17 MR. JENKINS: Yes.

18 THE COURT: Okay. And some of them are six miles
19 round trip so on 7/18/13 there is a six mile roundtrip
20 to Norfield Medical from Neeses. I assume that's
21 where you live, in Neeses?

22 MR. JENKINS: Right. Yes. Yes, Your Honor.

23 THE COURT: Okay. And then on August the 16th,
24 2013 there's a six mile roundtrip from Neeses to
25 Norfield Medical. On September 20th, 2013 there's a