

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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Appellate Case No.: 2015-002041  
SCWCC No. 1219931

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**RECEIVED**  
MAR 30 2018  
SC Court of Appeals

Mortesha Mouzon-Johnson, Claimant,

Appellant,

v.

Mead Westvaco, Self-Insured Employer,

Respondent.

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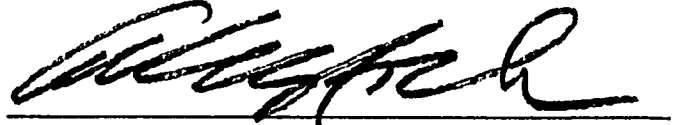
**APPELLANT'S RETURN TO RESPONDENT'S MOTION  
FOR FEES AND COSTS**

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The Appellant requests the Court deny the motion for costs, or, in the alternative, reduce the amount of costs to be awarded. The Appellant is an individual workers' compensation claimant without sufficient means to pay costs in the amount requested by the Respondent. In fact, the Appellant is no longer employed. The issue on appeal were not frivolous, and the arguments were made in good faith.

Respectfully submitted,

March 29, 2018

A handwritten signature in black ink, appearing to read 'A. Roche', written over a horizontal line.

Andrea C. Roche  
SC Bar #7563  
[aroche@mickleandbass.com](mailto:aroche@mickleandbass.com)  
Derrick L. Williams  
SC Bar #70192  
[dwilliams@mickleandbass.com](mailto:dwilliams@mickleandbass.com)  
Post Office Box 5639  
Columbia, South Carolina 29250  
(803) 929-0029  
ATTORNEYS FOR APPELLANT

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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COMPENSATION COMMISSION

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Mortasha Mouzon-Johnson, Claimant,

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Respondent.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that the above-named Respondent has been served a copy of Appellant's Return to Respondent's Motion for Fees and Costs via U.S. Mail, first class postage pre-paid, on March 29, 2018, addressed to the attorney of record, as follows:

Kirsten Leslie Barr, Esquire  
Trask & Howell, LLC  
763 Johnnie Dodds Boulevard  
Mount Pleasant, SC 29465

March 29, 2018

s/ Andrea C. Roche  
Andrea C. Roche, Esquire  
Mickle & Bass, LLC  
Post Office Box 5639  
Columbia, South Carolina 29250  
(803) 929-0029  
aroche@mickleandbass.com  
SC Bar No. 7563  
Attorney for Appellant



Ann McCrowey Mickle\*†  
J. Alan Bass\*†  
Derrick L. Williams\*†  
Andrea C. Roche \*†  
James "Jamie" Davidson, IV

March 29, 2018

*Reply to: Columbia Office*

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

RE: Mortesha Mouzon-Johnson v. Mead Westvaco  
SCWCC File No.: 1219931  
Appellate Case No.: 2015-002041

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MAR 30 2018  
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing please find the original and six (6) copies of Appellant's Return to Respondent's Motion for Fees and Costs and Proof of Service in the above-referenced matter.

With kind regards, I am

Sincerely,

s/ Andrea C. Roche  
Andrea C. Roche, Esquire  
SC Bar No.: 7563  
Mickle & Bass, LLC  
Post Office Box 5639  
Columbia, South Carolina 29250  
(803) 929-0029  
Attorney for Appellant

ACR/dbc  
Enclosures  
cc: Kirsten L. Barr, Esquire

930 Oakland Avenue  
PO Box 10751  
Rock Hill, SC 29731  
(803) 980.0083  
(803) 328.2525 fax

1519 Richland Street  
PO Box 5639  
Columbia, SC 29250  
(803) 929.0029  
(803) 929.1024 fax

1039 44<sup>th</sup> Avenue North  
Suite 102  
Myrtle Beach, SC 29577  
(843) 839.2501  
(843) 839.2507 fax

1517 Sam Rittenburg Blvd.  
Charleston, SC 29407  
(843) 406-2800  
(888) 884-8311 fax

+Partner

\*former SC Workers' Compensation Commissioner  
[www.MickleAndBass.com](http://www.MickleAndBass.com)

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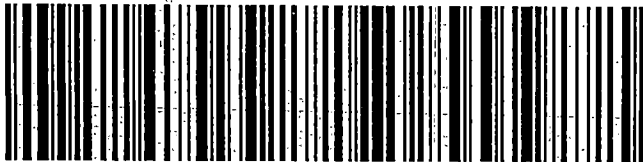
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**SHIP TO:** The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
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PO Box 11629  
Columbia SC 29211-1629



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