

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE APPELLATE PANEL OF THE  
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

W.C.C. File No. 1408826

Gennette Sowell,

Employee,  
Respondent

**RECEIVED**

v.

Piggly Wiggly,

Employer,

MAY 21 2018

and

SC Court of Appeals

Auto Owners Insurance Inc.,

Carrier,  
Appellants.

MOTION TO STRIKE AND  
TO EXTEND TIME

Kenya C. Miller, Esquire SC Bar #72634  
Kristian C. Bell, Esquire SC Bar #76578  
Dickie, McCamey & Chilcote, P.C.  
Post Office Box 2046  
Lancaster, South Carolina 29721  
(803) 285-0004  
Attorney for Appellants

The Respondent, Gennette Sowell, has designated two items to be included in the Record on Appeal. The Respondent has also discussed and referenced these items in the Statement of the Case in Respondent's Initial Brief.

These items were never submitted to the lower tribunal as exhibits and are not part of the record in this case. Accordingly, the Appellants, Piggly Wiggly and Auto Owners Insurance, Inc., respectfully move pursuant to Rules 210(c) and 263(b), SCACR, (1) to strike these items from the Respondent's Designation of Matter to be included in the Record on Appeal; (2) to strike any references to these items and any arguments based on these items in their Initial Brief; and (3) to extend the time limits for filing the Record on Appeal until the Court rules on this motion.

#### **RELEVANT FACTS**

This appeal involves a dispute over whether the Appellate Panel of the Worker's Compensation Commission erred in (1) evaluating Claimant's occupational asthma under S.C. Code Ann. Section 42-1-172; (2) finding claimant met her burden of proof under Section 42-11-10, et al; (3) finding Claimant permanent and totally disabled under S.C. Code Ann. Section 42-9-10; and (4) broadly awarding Claimant future medical treatment.

The Appellants filed their Initial Brief and Designation of Matter to be included in the Record on Appeal on February 6, 2018. The Respondent filed the Initial Brief and Designation of Matter to be included in the Record on Appeal on April 19, 2018.

The Respondent's Designation of Matter states as follows:

Appellant [sic] proposes the following be included in the Record on Appeal:

...

9. Letter to Commissioner dated 3/11/16;

...

12. My letter to Commission dated 4/27/16;

[See Designation of Matter, attached as Exhibit A.]

These items are referenced in the Respondent's Statement of the Case; however, the letters have no relevance to the issues presently being argued on appeal before this Court. Moreover, the letters are not a part of the evidentiary record of the lower tribunal. Appellants requested an agreement of the parties to remove the items as irrelevant to the appeal; however, no response was received before the filing of this Motion. [See Emails between the parties, attached as Exhibit B.]

#### DISCUSSION

Rule 210(c) of the South Carolina Appellate Court Rules provides that "[t]he Record on [Appeal] shall not . . . include matter which was not presented to the lower court or tribunal." See also Norris v. Ferre, 315 S.C. 179, 183, 432 S.E.2d 491, 493 (Ct. App. 1993)(Court of Appeals denied motion to supplement the Record on Appeal with deposition testimony where it was not presented to the Trial Court); Clements v. Young, 310 S.C. 73, 75, 425 S.E.2d 63, 64 n.1 (Ct. App. 1992)(stating that "[t]he South Carolina Appellate Court Rules require that '[t]he Record shall not [ ] include matter which was not presented to the lower court or tribunal.'").

Although a party may move to supplement the Record with the written consent of all parties under Rule 212(b), SCACR, this Rule must be read in conjunction with Rule 210(c), which prohibits matter which was not presented to the Trial Court. Jean Hoefler Toal et al., Appellate Practice in South Carolina 261 (2<sup>nd</sup> ed. 2002) (“Rule 212(b), SCACR, must, of course, be read in conjunction with Rule 210(c), SCACR, which declares that the record cannot include matter that was not presented to the lower court or tribunal.”).

Because Items 9 and 12, were not submitted to the Commission for consideration, they are outside the scope of matter properly included in the Record on Appeal. Therefore, the Respondent should be precluded from presenting these items to this Court for consideration or discussing these items in the Statement of the Case, Argument III, or anywhere else in their Brief.

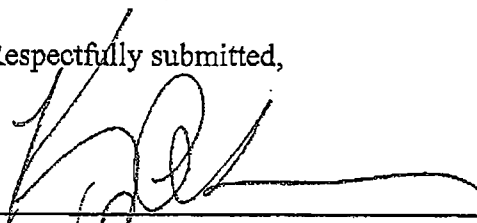
### CONCLUSION

For the foregoing reasons, the Appellants respectfully request:

1. That Items 9 and 12 listed in the Respondent’s Designation be stricken;
2. That discussion of and references to this material in the Initial Respondent’s Brief be stricken; and
3. That the time limits for filing the Record on Appeal be held in abeyance until the Court rules on this motion.

[Signature page follows.]

Respectfully submitted,



---

Kenya C. Miller, Esquire (SC Bar #72634)  
Kristian C. Bell, Esquire (SC Bar #76578)  
Dickie, McCamey & Chilcote, P.C.  
Post Office Box 2046  
Lancaster, South Carolina 29721  
(803) 285-0004  
Attorney for Appellants

May 18, 2018.

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE APPELLATE PANEL OF THE  
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

W.C.C. File No. 1408826

Gennette Sowell,

Employee,  
Respondent,

v.

Piggly Wiggly,

Employer,

and

Auto Owners Insurance Inc.,

Carrier,  
Appellants.

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MAY 21 2018  
SC Court of Appeals

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee Dickie, McCamey & Chilcote, P.C. and that she has served, on the date set forth below, a copy of the document described below, in the above entitled action to the following persons, pursuant to Section 15-9-930 and Section 15-9-940 of the Code of Laws of South Carolina, 1976, as well as Rule 203 and Rule 262 of the SCACR, by depositing a copy of same in the United States Mail, postage prepaid, addressed to:

TO:

VIA FAX (803) 734-1839 & U.S. MAIL

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

VIA FAX (803) 252-0709 & U.S. MAIL

Preston F. McDaniel, Esquire  
McDaniel Law Firm  
1315 Elmwood Ave  
Columbia, SC 29201

VIA FAX (843) 332-4646 & U.S. MAIL

Gerald Malloy, Esquire  
Malloy Law Firm  
108 Cargill Way  
Hartsville, SC 29551

DOCUMENT: MOTION TO STRIKE AND TO EXTEND TIME

DATE OF MAILING: May 18, 2018



Tamra Carver-McMillan  
Paralegal to Kenya C. Miller, Esquire and Kristian  
C. Bell, Esquire

# **EXHIBIT A**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

APR 23 2018

SC Court of Appeals

APPEAL FROM THE WORKERS' COMPENSATION COMMISSION

Appellate Case No.: 2017-002396  
WCC File No.: 1408826

Gennette Sowell, Employee, .....Respondent,

v.

Piggly Wiggly, Employer, and  
Auto Owners Insurance, Inc., Carrier, .....Appellants.

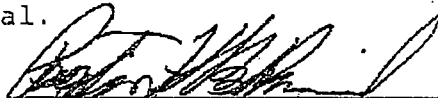
DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record  
on Appeal:

1. Form 50 Claim filed 7/17/14;
2. Form 50 Hearing filed 9/26/14;
3. Amended Form 50 Hearing filed 11/11/14;
4. Form 51 filed 12/18/14;
5. Hearing Notice for 12/18/14;
6. Form 70 filed 4/6/15 with handwritten amendments;
7. Form 70 filed 2/5/16;
8. Hearing Notice for 2/11/16;
9. Letter to Commissioner dated 3/11/16;
10. Hearing Notice for 3/15/16;
11. Letter to Commissioner James 4/15/16 with Amended PHB  
and APAs and including PHB and APAs filed 3/8/16;

12. My letter to Commission dated 4/27/16;
13. Form 70 filed 6/9/16;
14. Hearing Notice for 4/22/16 dated 4/27/16;
15. Hearing Notice for 7/21/16 dated 6/22/16;
16. Defendants' PHB/APAs filed 4/15/16; Supplemental PHB/APAs filed 6/13/16 and Revised 6/21/16;
17. Hearing Transcript for 6/22/16;
18. Hearing Transcript for 7/21/16;
19. Email Tamara 10/20/16;
20. Award of Commissioner James dated 5/16/17;
21. Full Commission Award dated 10/17/17;
22. Deposition of Dr. Gordon Early;
23. Deposition of Dr. Menendez.

I certify that this Designation contains no matter, which is irrelevant to this appeal.

  
Preston F. McDaniel, Esquire  
SC Bar No. 3770  
McDaniel Law Firm  
1315 Elmwood Avenue  
Columbia, SC 29201  
(803) 771-7211

And  
Gerald Malloy, Esquire  
SC Bar No. 12033  
Malloy Law Firm  
108 Cargill Way  
Hartsville, SC 29551  
(843) 339-3000  
Attorneys for Movant/Respondent  
To the Appeal for the Injured  
Worker, Ms. Gennette Sowell

April 19, 2018

# EXHIBIT B

**Bell, Kristian**

---

**From:** Bell, Kristian  
**Sent:** Thursday, May 17, 2018 12:28 PM  
**To:** 'Sabrina Kelley'; preston@pfmcdlaw.com  
**Cc:** Miller, Kenya; 'Gerald Malloy'; Carver, Tamra; 'Denise'  
**Subject:** RE: Genette Sowell Record on Appeal

Preston

Pursuant to my conversation with Sabrina yesterday, I understand you are in oral arguments at the Court of Appeals today. We need to discuss two items included in your Designation of Matter. As you know, the Record on Appeal is due Monday, May 21, 2018.

There are two letters (March 11, 2016 and April 27, 2016) that we do not believe are material to the appeal, and are therefore, improper to include in the Record on Appeal. Since we are tasked per the rules to make a certification that everything included in the ROA is material and relevant to the appeal, we cannot include those items. As such, please let us know if you agree that we can leave them out. Alternatively, if you want them included, please complete the certification yourself and we will attach that to the ROA. If neither option is agreeable to you or we do not have your response by tomorrow at noon, we will request an extension to the file the ROA so we have time to discuss with each other further.

Please let us know once you get a free moment.

Thanks,

Kristian

**Kristian C. Bell, Esquire**  
Of Counsel  
803-285-0004 Office  
803-285-0042 Fax  
[kbell@dmclaw.com](mailto:kbell@dmclaw.com)

Honorable Jenny Abbott Kitchings,  
South Carolina Court of Appeals,  
1220 Senate Street,  
Columbia, Sc 29201

Via fax

803-734

-1839

Ref : Viresh Sinha v. Neelu Choudhry  
Appellate Case no : 2017-001702

Honorable Kitchings,

I had mailed the Record on Appeal on 28<sup>th</sup> April, and had an understanding that I had 30 days to file the Final Brief. I was waiting to prepare the Final briefs on the weekend, while I realized that Final briefs are supposed to be filed in 20 days.

I am faxing you a copy for your record to show my good faith, will be mailing 14 bound and one unbound copy to your office and serving a copy to respondent's attorney as well on Monday, May 21<sup>st</sup> as soon as the post office opens.

Please accept my apologies and Final briefs.

Respectfully,

May 19th, 2018



Viresh Sinha ( Pro se )  
3600 Chateau Drive # 221  
Columbia, South Carolina 29204  
(818) 422- 3608

cc Bill for fees

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

**APPEAL FROM RICHLAND COUNTY  
5<sup>th</sup> Circuit Court**

**Hon. Dorothy Mobley Jones, Hon. Rosalyn Frierson-Smith,  
Family Court Judges**

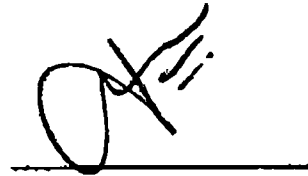
**Case No. 2017-DR-40-1859  
Appellate Case No. 2017-001702**

**Viresh Sinha .....Appellant**

**v.**

**Neelu Choudhry .....Respondent**

**FINAL BRIEF OF APPELLANT**



**Viresh Sinha ( Pro se)  
3600 Chateau Drive # 221  
Columbia, South Carolina 29204  
(818) 422- 3608**

**Other Counsel of Record:  
Bill Fortino  
1700 Sunset Blvd, West Columbia, SC 29169  
Attorney for Respondent**

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CASES

*E.D.M. v. T.A.M.*, 307 S.C. 471, 415 S.E.2d 812 (1992)

*Sherman Vs. Sherman* 307 S.C. 280, 414 S.E. 2d 809 ( Ct. App 1992)

*Glasscock Vs. Glasscock* 304 S. C. 158 43, S.E. 2d 313 (1991)

STATUTES

AMMENDMENT 1<sup>st</sup>

AMMENDMENT 8<sup>th</sup>

AMENDMENT 14<sup>th</sup>

SC RULE 11

SC RULE 12 b(6)

SC RULE 15

SC RULE 60 (B)

SC RULE 408

18 U.S. Code § 241

## STATEMENT OF ISSUES ON APPEAL

1. Honorable Dorothy Mobley Jones & Honorable Rosalyn Frierson-Smith abused their discretion in NOT granting the evidentiary hearing / weighing the evidence for change of circumstances to adjust the child support as per the Appellant's current income after his business was closed in November, 2016.
2. Honorable Dorothy Mobley Jones & Honorable Rosalyn Frierson-Smith abused their discretion in awarding Respondent, the Attorney's fees, when Appellant didn't have capacity to pay his own Attorney's fees and was self represented.
3. Honorable Rosalyn Frierson-Smith has abused her discretion in not awarding the Appellant, costs incurred by him in this litigation.
4. Honorable Rosalyn Frierson-Smith has abused her discretion and abused the law ( RULE 11 & Settlement RULE ) in dismissing Appellant's motion of holding the Respondent & her attorney in Contempt under 18 U.S. Code 241 – for threatening and intimidating the Appellant.
5. Also, the dismissal of the above motion is not mentioned in Final order, which was prepared by Respondent's Attorney , Bill Fortino , which I believe is Misrepresentation in an attempt that that the issue remains non-appealable.

STATEMENT OF THE CASE

For Docket no. 2015-DR-40-2622 , four ( 4 ) day trial was held on October 17-20, 2016 and ruling was entered on November 23<sup>rd</sup>, 2016. Final order was filed on March 31<sup>st</sup>, 2017.

**There's an Appeal Pending against that order under case no. 2017-001082.**

Appellant filed a new complaint alleging change of circumstances on May 10<sup>th</sup>, 2017.

Respondent Filed a Motion to Strike/dismiss the complaint demanding \$5000 in Attorney's fees on June 13<sup>th</sup> , 2017 in June 13, 2017 hearing.

Temporary order was filed on July 12<sup>th</sup>, 2017 and hearing was set for August 1<sup>st</sup>, 2017 for Respondent's Motion to Strike.

Appellant amended and supplemented his complaint on August 1<sup>st</sup>, 2017 .

Final Order was filed on August 14<sup>th</sup>, 2017

## ARGUMENTS

After a 4 day trial on 17-20<sup>th</sup> the October, 2016 , Honorable Gwendlyn Jones made a ruling on November 23<sup>rd</sup>, 2016.

1. In the Ruling of November 23<sup>rd</sup>, 2016 Appellant's income was imputed as \$4302 per month, based on the evidence provided by the Respondent. ( R. p 168 line 25, p 169 line 1)
2. As per ruling, Appellant was also required to Pay Back Child support from California Order and was also required to pay \$10,000 in Attorney fees to the Respondent, even though he didn't have money to afford himself an Attorney and was un-represented during the 4 day trial.

**(Appeal pending under Case no. 2017- 001082 for including but not limited to : Fraud, Misrepresentation & Misconduct of producing falsified evidence)**

3. Appellant was running a small independent school was struggling financially and there was no way for him to meet the financial obligations set forth in the Ruling of November 23<sup>rd</sup>, 2016.
4. Appellant shut down his school five (5) days after the Ruling of November 23<sup>rd</sup>, 2016 and started looking for a job. After trying hard for several months, Appellant could land a Commission Only Sales Job at Carmax.
5. Appellant tried his best to communicate with the Respondent's attorney to adjust the Child support obligations as he was not able to meet his obligation. Respondent's attorney was willing to consider Appellant's request only if Appellant withdrew his Appeal which is Pending under Case no. 2017-001082, which was not acceptable to the Appellant.  
  
( R. p 155 , para 3rd)
6. Appellant had no choice but to file a complaint for Change of Circumstance to adjust the Child Support on May 10<sup>th</sup>, 2017.

7. Right After the Ruling of November 23<sup>rd</sup> 2016, Respondent's adult male friend had started living with her in the same house as the minor child.
8. Appellant also believed that Respondent's action of starting to live with another Man, with a young male Child at home was a substantial change of circumstance and not in the best interest of the child, and Appellant brought this issue in his complaint as well demanding for change in Physical and Legal custody arrangements.
9. Temporary hearing was held on June 13<sup>th</sup>, 2016 where Respondent filed a Motion to dismiss/strike the complaint and demanded for \$5000 in Attorney's fees. ( R. p 135-136)
10. Honorable Dorothy Mobley Jones didn't grant any evidentiary hearing/ weighed upon Appellant's evidence of Job Search , Credit Card debts, etc and dismissed the Temporary Hearing without any evidence provided by Respondent which would prove Appellant's income to be more than \$1500- \$1750 / month. ( R. 87-99, 104-118)
11. Respondent's Motion to Dismiss / Strike the complaint was scheduled for August 1<sup>st</sup>, 2017.
12. Intimidated by an excessive demand of \$5000 in Attorney's fees, Appellant decided to amend his complaint and with drew the demand of Physical & Legal custody from the complaint. ( p 154-161)
13. Honorable Rosalyn Frierson-Smith didn't award any evidentiary hearing and dismissed the complaint without weighing upon Appellant's evidence.
14. Appellant's complaint of Adjustment of Child support was dismissed just because of the fact that it was imputed a few months ago.
15. The fact that Appellant's business was closed down and after being self-employed for several years , Appellant had started a job was ignored by Both the Honorable Judges where by they abused their discretion.

16. Also, Honorable Rosalyn Frierson-Smith abused her discretion & law in dismissing Appellant's motion ( amendment of complaint) of holding Respondent and her attorney in contempt under 18 U.S. Code § 241 where (1) Respondent's attorney had started demanding the Judgment Money when the Final order was not even filed by Honorable Gwendlyn Jones ( Docket no. 2015-DR-40-2622) and was still in the automatic stay period. (2) Respondent's Attorney had demanded \$5000 in affidavit towards the expenses of preparing the Motion to Strike Appellant's complaint.
17. Respondent's attorney Bill Fortino brought the settlement Rule to NOT consider the emails / Talks written/ conversation by Bill Fortino to the Appellant, while some of those emails were NOT even a part of any negotiation rather simply to intimidate the Appellant and keep the Appellant in a state of oppression and were written even before the Final order was issued, which was March 31<sup>st</sup>, 2017. Also, email / conversation which was for settlement was brought in for a different reason, proving intimidation, rather than enforcing the settlement agreement, which I believe is allowed by law under SC Rule 408 ( R 196 line 7-25)
18. Respondent's attorney also brought Rule 11, which also doesn't apply here, as Bill Fortino had already given the demand of \$5000 in his affidavit signed by him on June 13<sup>th</sup> 2017 which was excessive just to crush any attempt by Appellant to seek Justice.

**(LINE IN ADDITION TO INITIAL BRIEF)**

18b. Appellant's income was imputed on November 23<sup>rd</sup>, 2016 based on evidence produced by Respondent. ( R. p 168 line 25, p 169 line 1) – *Pending appeal for fraud & misrepresentation*. While Bill Fortino tells to the judge in this case the income was imputed based on Appellant's capacity to earn. ( p 189, line 7-15 ). While Appellant has to take an Oath, respondent's attorney took an advantage of Rule 11 and misstated the facts.

19. Respondent filed a contempt Action which was heard on July 17 2017 and order filed on August 24<sup>th</sup>, 2017.

20. While Appellant is trying his best to comply with that order and has not expired yet , ( November 22<sup>nd</sup>, 2017 is the date for issuing the Bench warrant for non-payment) , Respondent has already filed another Contempt Action on October 24<sup>th</sup>, 2017, which is clearly in line with their Harassment / Intimidation of the Appellant.

21. Both Honorable Dorothy Mobley Jones & Honorable Rosalyn-Frierson-Smith , have abused their discretion in not adjusting the Appellant's / not giving him any evidentiary hearing for adjustment of child support while Respondent is bringing contempt after contempt.

#### CONCLUSION RELIEF SOUGHT

1. Final Order dated August 14<sup>th</sup>, 2017 should be vacated/ set aside.
2. Appellant should be awarded a Cost of \$1400 as demanded in his amended complaint.
3. Appellant should be awarded a Cost of \$1500 towards this appeal process.
4. Respondent and her Attorney, Bill Fortino should be held in contempt under 18 U.S. Code § 241 for keeping the Appellant intimidated and under a state of oppression.

Respectfully,

/

Viresh Sinha (*Pro Se* ..Appellant)

3600 Chateau Drive # 221

Columbia, SC 29204



Kenya C. Miller  
Attorney at Law  
Admitted in SC

803-285-0034  
Fax: 888-811-7144  
kmiller@dmclaw.com

May 18, 2018

**VIA FAX (803) 734-1839 & REGULAR MAIL**

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

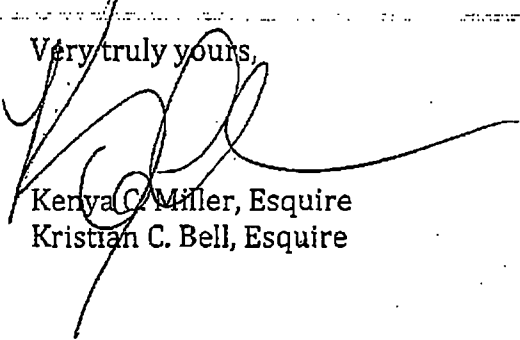
RE: Genette Sowell v. Piggly Wiggly  
**Appellate Case No. 2017-002396**  
Date of Accident: 1/6/2014  
WCC File No.: 1408826  
Our File No.: 0056461.0349337  
Claim No.: 36-1835-2014

Dear Ms. Kitchings:

Enclosed for filing please find one (1) original and six (6) copies of a Motion to Strike and Extend Time in the above-referenced matter along with the applicable filing fee. Please clock the copies and return them to us in the enclosed self-addressed stamped envelope.

By copy of this letter, we are serving the Motion via regular U.S. mail to Respondent's attorneys, Preston McDaniel, Esquire and Gerald Malloy, Esquire. Enclosed please find a certificate of service verifying same. Please feel free to contact me should you have any questions or concerns regarding this submission.

Very truly yours,

  
Kenya C. Miller, Esquire  
Kristian C. Bell, Esquire

KCB:KCM:snw

cc: Preston McDaniel, Esquire (via regular mail)  
Gerald Malloy, Esquire (via regular mail)

**FACSIMILE**

**PLEASE HAND DELIVER, AS SOON AS POSSIBLE, THE FOLLOWING FACSIMILE TRANSMISSION TO:**

NAME: 803-734-1839 DATE: 5/18/2018  
COMPANY: PHONE NO.:  
FAX NO.: RE: Genette Sowell Claim No. 36-1835-2014  
FROM: Sade Williams

TOTAL NUMBER OF PAGES (including cover sheet): 14

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MESSAGE: Please see attached correspondence in regards to the above-referenced matter.  
Thanks,

**RECEIVED**

MAY 21 2018

SC Court of Appeals

IF YOU HAVE ANY PROBLEMS RECEIVING THIS TRANSMISSION,

PLEASE CONTACT: Sade Williams PHONE NO.: 803-285-0004 FAX NO.: 803-285-0042

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

DICKIE, McCAMEY & CHILCOTE, P.C. | ATTORNEYS AT LAW  
MAIN: 803-285-0004 FAX: 888-811-7744  
103-A S. CATAWBA STREET | P.O. BOX 2046 | LANCASTER, SC 29721-2046 | WWW.DMCLAW.COM

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