

PROOF OF SERVICE OF A NOTICE OF ADDITIONAL EVIDENCE
THE STATE OF SOUTH CAROLINA
In The Court of Appeals

South Carolina Workers Compensation Commission T. Scott Beck, Chairman
Commissioner

T. Scott Beck, Chairman Commissioner

Case No. 1612632

South Carolina Workers
Compensation Commission
and AMAZON,

Respondent,

V.

Bobby Anderson,

Appellant.

PROOF OF SERVICE

I Bobby Anderson hereby certify that I have served the Notice of additional evidence to Amazon Attorney Jared C. Williams and Commissioner T. Scott Beck Dated June 29, 2018 by depositing a copy of it in the United States Mail, postage prepaid and also VIA Fax, on June 29, 2018, and again on addressed to AMAZON attorney of record, Jared C. Williams, 885-B Island Park Drive Charleston, South Carolina 29492 and I personally walk-in and hand deliver a copy to Anita East of Workers or Ms. Peggy of Worker Compensation or any other agent of Compensation and fax copy of the documents to Workman Compensation at Commissioner T. Scott Beck office at 1333 Main Street, Suite, 500 Columbia, SC, 29202-1715

I would like to provide additional evidence showing that I requested for accommodation by e-mail and none of my accommodation that I requested never been met and Amazon attorney stated that I said that I no longer needed accommodation is far from the truth and this is a clear attempt to try to remove all liability for my work related injury.

June 29, 2018

s/ Bobby R. Anderson
Bobby R. Anderson
C/o 500 Buckhaven Way
Columbia, South Carolina [29229]
(803) 592-0062
Private Attorney In-Fact for Appellant

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JUN 29 2018
SC Court of Appeals

Other Counsel of Record:

Jared C. Williams, Esquire

South Carolina Bar No 100806

MOORE INGRAM JOHNSON & Steele, LLP

885-B Island Park Drive

Charleston, South Carolina 29492

Telephone: (843) 302-0002

Fax: (843) 302-0003

Attorney for Respondent

Commissioner: T. Scott Beck

1333 Main Street, Suite 500

Columbia, South Carolina 29202-1715

Telephone: (803) 737-5698

Fax: (803) 737-1281

Commission for Respondent

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JUN 29 2018

Subject: Re: Bobbande 16090600339

From: wellerbw@amazon.com

To: italklivedotcom@yahoo.com

Date: Sunday, October 9, 2016, 2:35:22 AM EDT

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Can you please stop sending this information to the third party escalation inbox. As previously stated this is not Amazon and I do not advise you emailing them all of this. Also, the accommodations email is forwarded to myself, so you are sending it twice to me. You do not need to do this.

I will be able to evaluate your documentation on Monday and discuss your case with the operation team at your site for an accommodation.

Thank you.

Briana Weller

On Oct 8, 2016, at 7:20 PM, adfasdf adfadsfa <italklivedotcom@yahoo.com> wrote:

Dear Briana Weller do you need any more documentation from my doctor for my Musculoskeletal disorder?

I want to give you a list of side of effect from the medication that i am taking for my musculoskeletal disorder

Methodological side effect

- fever, chills, flu symptoms;
- slow heart rate;
- feeling like you might pass out;
- seizure (convulsions); or
- jaundice (yellowing of your skin or eyes).

Less serious side effects may include:

- dizziness, spinning sensation, drowsiness;
- headache, confusion, memory problems, loss of balance or coordination;
- nausea, vomiting, upset stomach;
- flushing (warmth, redness, or tingly feeling);
- blurred vision, double vision, eye redness;
- sleep problems (insomnia);
- stuffy nose; or
- mild itching or rash

Naproxen side effects

indigestion,heartburn,stomach pain, nausea
diarrhea,constipation
headache,dizziness,drowsiness
swelling in your hands or feet
bruising, itching, rash, sweating: or.
ringing in your ears. and more.

I also would like to say i also have a vision impairment and I would like to get accommodation for my vision at my work facility what supporting documentation do you need?

today I went back to work I had worked in a new location it took me 20 minute to find the location because i couldn't find a person to ask where the location was but beside that i am gonna need my job to be restructure.

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Subject: Re: phone call from Anna

From: wellerbw@amazon.com

To: italklivedotcom@yahoo.com

Date: Friday, October 7, 2016, 1:36:40 PM EDT

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Hi Bobby,

I talked to Anna and told her I would call you after my meetings today.

Can you please stop sending these emails to the AON email, this is an escalation alias specifically for leave cases not accommodation cases. This is also a third party vendor we use, not Amazon.

Also the accommodation email is being redirected to myself so you do not need to copy that alias either.

I am in meetings until three today and will call as soon as I am free to discuss your case.

Thank you.

Briana

Sent from my iPhone

On Oct 7, 2016, at 1:27 PM, adfasdf adfadsfa <italklivedotcom@yahoo.com> wrote:

Dear Accommodation Team, I received a phone call from this number (803)791-6522 It was a young lady name Anna from my amazon facility. The time was around 10:00 am, I told her that all my restrictions been lifted from my doctor and I am requesting accommodation for my disability and the medication that I am own Naproxen and methocarbamol. I think that it is imperative that you Honor my accommodation. I am able and willing to work. I was ready for work today but I was sent home in the conversation with the young lady she said that out bound was off today due to maintenance in the facility and she ask me to return next week to work and I told her that I will be returning tomorrow. I don't know what going on but I really do feel put off and feel like I am being avoided there seem to be a gap in the communication. i am looking forward to your quick and immediate response.

Subject: Bobby Anderson work accomdation Case number #16090600339

From: italklivedotcom@yahoo.com

To: wellerbw@amazon.com; amazonam@aonhewitt.com; amazonesc@aonhewitt.com

Date: Friday, October 7, 2016, 2:08:10 AM PDT

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To Whom it may concern: Amazon accommodation team and HR.
10/7/2016

I Bobby Anderson,

500 Buck heaven Way, Columbia South Carolina 29229. My phone number is (803)592-0062
Case number #16090600339

This letter serves as a recap of our conversation VIA E-mail with Amazon absence
management (LOAA) Team. On Sep 2, 2016 at 10:48am

My doctor has prescribed naproxen and methocarbamol I Addendum medication prescription
with this document.

1. I have a disability as defined below:
A physical or mental impairment that substantially limits one or more life activities;
Or a record of having such an impairment; or regarded as having such an impairment.
2. As a result of this disability, I am requesting the following employment reasonable
accommodation.

I am requesting in the structure of my workday or workplace I would need to take my
medication 30 minute before my lunch as my medication state on the bottle. And it may cause
me to have to go use the bathroom more during my shift and I need a chair in case of fatigue
and dizziness and fast heartbeat.

A change in the following rule, policy or procedure. I request a meeting on job duties

I would like to change the way that my work place communicate with me and I would like to
have everything in written.

If you have any question regarding this letter please contact me at
italklivedotcom@yahoo.com

Your prompt attention to this request is appreciated.

Sincerely,

Bobby Anderson

Initials

Enclosures

CC: Employee File

Subject: Fw: Automatic reply: Dear Amazon Accommodation (LOAA) Team

From: italklivvedotcom@yahoo.com

To: commmgr-autoreply@amazon.com

Date: Thursday, September 8, 2016, 12:29:16 AM EDT

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On Friday, September 2, 2016 6:26 PM, Amazon Absence Management <AmazonAM@aonhewitt.com> wrote:

Hello,

Thank you for contacting MyLeave. Our goal is to reply within 2 business days although some requests require additional time to research. Thank you for your patience in the interim. If after 2 business days you do not receive a response from the Amazon Absence Management team, please email the MyLeave Escalations Team at AmazonESC@aonhewitt.com.

Sincerely,

MyLeave Team

Subject: Re: phone call from Anna

From: italklivvedotcom@yahoo.com

To: wellerbw@amazon.com

Date: Friday, October 7, 2016, 3:09:25 PM EDT

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Dear Briana

The telephone got disconnected abruptly I was about to ask can you please email the fax number for I can have my doctors officer fax over a copy of the accommodation that I am requesting. I am looking for a request response

On Friday, October 7, 2016 10:36 AM, "Weller, Briana" <wellerbw@amazon.com> wrote:

Hi Bobby,

I talked to Anna and told her I would call you after my meetings today.

Can you please stop sending these emails to the AON email, this is an escalation alias specifically for leave cases not accommodation cases. This is also a third party vendor we use, not Amazon.

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Subject: RE: phone call from Anna

From: wellerbw@amazon.com

To: italklivedotcom@yahoo.com

Date: Friday, October 7, 2016, 3:16:30 PM EDT

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Hi Bobby,

My email is wellerbw@amazon.com and the accommodation fax is 1-206-946-7289.

Thank you.

Briana Weller

Regional Accommodations Specialist: FL, GA, NC, SC| Amazon

E: wellerbw@amazon.com

Fax: 1-206-946-7289

For leave of absence contact:

Phone: 1-888-892-7180, press option 1

Fax: 1-847-554-1812

Online: <https://myleave.amazon.com/> (you must be on the Amazon network to access)

Mail documents to: P.O. Box 563937, Charlotte, NC 28256-3937

Escalations: [quicklink](#) (you must be on the Amazon network to access)

From: adfasdf adfadsfa [mailto:italklivvedotcom@yahoo.com]
Sent: Friday, October 07, 2016 3:09 PM
To: Weller, Briana <wellerbw@amazon.com>
Subject: Re: phone call from Anna

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I am looking for a request response

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I am in meetings until three today and will call as soon as I am free to discuss your case.

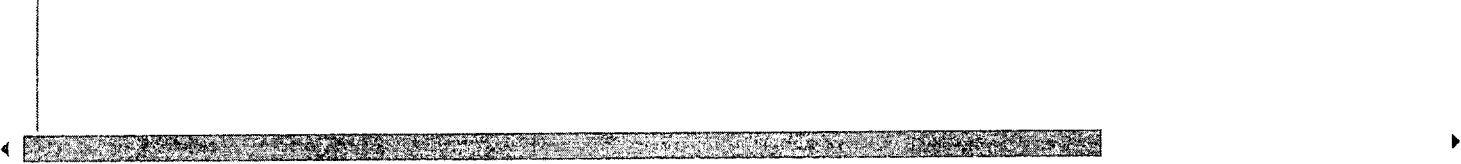
Thank you.

Briana

Sent from my iPhone

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Subject: Accommodation Case Update - Bobby Anderson

From: wellerbw@amazon.com

To: italklivedotcom@yahoo.com

Date: Thursday, September 8, 2016, 4:40:15 PM EDT

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Hi Bobby,

I just called and left you a message but wanted to follow up with an email.

We received your medical and ran a job safety analysis. According to your physician your restrictions are high and the site is unable to accommodate you safely at this time. We have placed you out on a leave of absence at this time, I have coordinated with your HR team and the Leave of Absence team. This usually takes about 3-4 business days to be completely set up, you do not need to do anything. Once received I will send you your leave case number/case manager and contact details so you can follow up with them on any questions and issues.

Your physician gave instructions for physical therapy, do you have a follow up appointment? I have attached a blank RMI for your follow up, or we will need something confirming that your restrictions have lifted. We cannot return you to work without updated medical.

If you have any questions please feel free to reach out. You can fax or email me the forms directly, the fax number goes to my accommodations team: 1-206-946-7289.

Thank you.

Briana Weller

Regional Accommodations Specialist: FL, GA, NC, SC | Amazon

E: wellerbw@amazon.com

Fax: 1-206-946-7289

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Phone: 1-888-892-7180, press option 1

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