

THE STATE OF SOUTH CAROLINA  
IN THE COURT APPEALS

APPEAL From APPELLATE PANEL  
South Carolina Workers' Compensation Commission  
Michael Campbell, Gene McCaskill, Melody James  
Commissioners

W.C.C. File No 1709864  
Appellate Case No - 2019-000460

Sarah Jefferies,

VS

**RECEIVED**

Appellate,

Williken And Company,

AUG 29 2019

SC Court of Appeals

Employer,

and

Liberty Insurance Corporation,

Carries/ Respondents,

INITIAL BRIEF APPELLANT

I Certify that I have Served the INITIAL BRIEF APPELLANT on South Carolina Workers' Compensation Commission by depositing Copy of it in the United State Mail, Postage Prepaid, on August 26, 2019 addressed to South Carolina Workers' Compensation Commission 1333 Main Street, Suite 500 P.O. Box 1715 Columbia S.C. 29202-1715

August 26, 2019

Sarah Jefferies  
Sarah Jefferies  
Appellant  
Post Office Box 161606  
Boiling Spring South Carolina  
29316  
KLLD 305-2188

# ~~INITIAL~~ ~~BRIEF~~ ~~APPELLANT~~

On June 22<sup>nd</sup>, 2017, I Sarah Jefferies was working on a job that my supervisor asked me to run due to short of help in my department. While doing this job, this job consists of yarn weighing at around 100 lbs. While pushing this rack of yarn, it caused me to pull a socket out of my left hip. I followed the proper procedures by informing/reporting to my supervisor (Steven Logan) of my injury. He reported the injury to his supervisor (Michael Williams). Mr. Williams called the nurse (Ashley Atchley) whom was not at the plant that day. Because of the absence of the nurse, I didn't get to follow up with her until the following Monday, June 26, 2017. Which also, at that time in question, I was not limping but I was feeling strong pains. (Reflecting to page 40).

When I returned back to work on Monday and was able to see nurse Ashley, I had pain in both legs in pelvic area. I discussed my injury and pain with the nurse, Ashley, whom never wrote a statement on my injury; neither did my supervisor (Steven). My conversation with nurse Ashley was basically discussing where my pain was and how I was injured. (Pain in pelvic area pg. 51-53)

The plant had shut down for the week of July 4<sup>th</sup>. After a week off my legs and relaxing them at home and not away on vacation (pg.24 trying to change my words around). I returned back to work after shut down, still trying to perform my job as directed/instructed. My legs still bothered me so bad that Mr. Steven and Mr. Williams put a coworker with me to help me with my job. I hopped and still did my best with working with tears in my eyes full of pain, until Mr. Williams come to me and suggested I go home, because I was in so much pain that was on Aug, 23, 2017. The next day Aug. 24, 2017, I called in to report off work because of excruciating pain. Mr. Logan asked me to come in and see the nurse. In which at that time, is when nurse Ashley put me on light duty and request for me to get a walking cane stick to help with my walk and allow me to sit down on the job. I did as I was instructed every day until I couldn't endure the pain any longer.

I never had any previous hip problems in the past. I have all my medical records (primary family doctor) to show proof of statements. I went to my family doctor (Dr. Ruffin) when I had my car accidents or any other medical problems. (Doctor records attached).

On March 2, 2018, I turned in proofs of medical records that was not acknowledged on transcript, but was stated in court and I have them attached.

In 2014, I was not employed by Milliken and the incident in questioning took place when I was employed by Springfield. (See page 54). That was concerning my right leg, which was also injured by pushing a rack of yarn.

I have been employed at Milliken for 10 years. During the 10 years of service, I have been a big asset to the company. When they were short of help, I have stepped in a great team worker by working plenty of overtime, switching shifts, also agreeing to come in early in the morning hours to allow the machines running.

Therefore, if I had suffered from previous hip or any other serious injuries, I would not have been able to put in so much time and effort to help carry out as many duties that I have.

WCC File no - 1709864

**Subjective**

**Chief Complaint**

Patient presents with

- Hip Pain

*Impairment Rating for court 3/2/18 10:45*

Hurt at work in June

Ended up needing left hip surgery

Had hip replacement surgery in Nov

Still going to therapy

Left hip pain

Using a walker still

Significant pain persists

**Past medical and surgical history reviewed and updated**

**Medications and allergies reviewed and updated**

**Objective**

**Visit Vitals**

BP	125/81 (BP Location: Left arm, Patient Position: Sitting)
Pulse	74
Temp	98.6 °F (37 °C) (Oral)
Ht	5' 7" (1.702 m)
Wt	85.7 kg (189 lb)
Breastfeeding?	No
BMI	29.60 kg/m <sup>2</sup>

**General:** Well Developed, Well Nourished, No distress

NO obvious injury or sign of trauma

Ambulates into room

**Orthopedic exam:**

**Left hip is tender**

**Mild decrease rom of left hip**

**Difficulty getting up out of a standard chair**

**Hard time sitting down in a chair without arms**

**Abnormal gait -- using a walker**

**Spine exam:**

**Neck:** Supple with normal range of motion, No lymphadenopathy

**Lower Back:** Non-tender, full rom of spine, -SLR, +2 reflexes

**Neurologic:** Normal sensation, No focal deficits, Cranial Nerves II-XII intact

**Progress Notes**

Richard Joseph Ruffing, MD (Physician) • Family Medicine

"pulled the hip socket out"

Injured 6/22 2017 while working at Milliken plant

Surgery Nov 20

Left hip replacement

- [DISCONTINUED] Apply 1 application 100 g 3  
diclofenac (use for topically 4 (four)  
VOLTAREN) 1 % gel times a day.  
(Patient not taking:  
Reported on  
10/7/2017 )

---

- [DISCONTINUED] Take 1 tablet (75 60 tablet 0  
diclofenac (use for mg total) by mouth  
VOLTAREN) 75 mg EC 2 (two) times a  
tablet day.

No facility-administered encounter medications on file as of 1/25/2018.

No orders of the defined types were placed in this encounter.

Risks, benefits, and alternatives of the medications and treatment plan prescribed today were discussed, and patient expressed understanding.  
No Follow-up on file.

**Subjective**

**Chief Complaint**

Patient presents with

- Hip Pain  
*had left hip surgery 11/20/17, hurt at work milliken 6/22/17*
- Hypertension  
*questions about med, saw something on tv and internet*

hip replacement -- can not afford PT

Told her it was critical

Talked about zestoretic -- it is a great bp medical

**Past Medical History, Past Surgery History, Allergies History** were reviewed and updated.  
**MEDICATIONS: REVIEWED AND UPDATED**

**Objective**

**Visit Vitals**

BP 123/75 (BP Location: Left arm,  
Patient Position: Sitting)  
Pulse 76  
Temp 97.5 °F (36.4 °C) (Oral)  
Ht 5' 7" (1.702 m)  
Wt 82.6 kg (182 lb)  
Breastfeeding? No  
BMI 28.51 kg/m<sup>2</sup>

**General:** Well Developed, Well Nourished, No distress

**Head, Eyes, Ears, Nose, Throat:** Normocephalic, atraumatic, PERRLA, Conjunctiva normal, Bilateral EAC and TM normal, Nares normal, Oropharynx moist and clear

**Neck:** Supple with normal range of motion, No lymphadenopathy

Ms. Sarah Jefferies  
P.O. Box 16106  
Boiling Springs, SC 29316  
(864)345-3688

*Court of Appeals  
1220 Senate Street  
Columbia, SC 29201*

RE: Sarah Jefferies vs. Milliken and Company, Liberty Insurance Company  
WWC, File on 1709864  
Appellate Case No. 2019-000460  
Initial Brief Appellant's  
Proof of Service

**RECEIVED**  
AUG 29 2019  
SC Court of Appeals

To whom it may concern:

Enclosed please find initial brief appellant's and proof of service in connection with the above referenced case. If you have any questions or concerns, I can be reached at (864)345-3688.

Sincerely,

Sarah Jefferies

  
Sarah Jefferies

Claimant

Enclosures

CC. Jeffery S. Jones, Esquire

CC. South Carolina Workers Compensation Commission

Initial Brief Appellant From Administrative Tribunal  
The State of South Carolina  
In the Court of Appeal

Appeal from Appellate Panel  
South Carolina Worker's Compensation Commission  
Michael Campbell, Gene McCaskill, Melody James  
Commissioners

W.C.C. File No. 1709864  
Appellate Case No. 2019-000460

Sarah Jefferies

vs.

Appellant

South Carolina Worker's Compensation Commission

### Proof of Service

I certify that I have served all the Initial Brief Appellant on South Carolina Worker's Compensation Commission by depositing copy of it in the United States Postage prepaid on August 26, 2019. Addressed to South Carolina Worker's Compensation Commission 1333 Main Street, Suite 500 P.O. Box 1715 Columbia, SC 29202-1715

  
Sarah Jefferies

Appellant  
PO Box 16106  
Boiling Springs, SC 29316  
(864)345-3688

**RECEIVED**  
AUG 29 2019  
SC Court of Appeals

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL



# PRIORITY MAIL

- Date of delivery specified\*
- USPS TRACKING™ included to many major international destinations.
- Limited international insurance.
- Pick up available.\*
- Order supplies online.\*
- When used internationally, a cust declaration label may be required.

\* Domestic only



PS00001000014

EXPECTED DELIVERY DAY: 08/30/19  
USPS SIGNATURE TRACKING NUMBER



9510 8151 8567 9240 3734 17

EP14F Oct 2018  
OD: 12 1/2 x 9 1/2

USPS.COM/PICKUP



U.S. POSTAGE PAID  
RV 2019  
GAFFNEY, SC  
29541  
AUG 28 '16  
A50JUN  
**\$10.40**  
R2304N1:7415:39

FROM:

**PRIORITY MAIL**



VISIT US AT USPS.COM  
ORDER POST SUPPLIES ONLINE

FROM: Sarah Jefferies  
P.O. Box 161606  
Boiling Springs S.C. 29316

**RECEIVED**

AUG 28 2019

TO SC Court of Appeals  
1220 Senate Street  
Columbia S.C. 29201

Label 228, March 2018

FOR DOMESTIC AND INTERNATIONAL USE

This packaging is the property of the U.S. Postal Service and is provided solely for use in sending Priority Mail shipments. Reuse may be a violation of Federal law. This packaging is not for resale. EPIAF © U.S. Postal Service, October 2018. All rights reserved.

\* Domestic only. \* For Domestic shipments, the maximum weight is 70 lbs. For International shipments, the maximum weight is 4 lbs.

INITIAL BRIEF APPELLANT FROM ADMINISTRATIVE TRIBUNAL

THE STATE OF SOUTH CAROLINA  
In THE COURT APPEALS

APPEAL FROM APPELLATE PANEL  
South Carolina Workers' Compensation Commission  
Michael Campbell, Gene McCaskill, Melody James  
Commissioners

W.C.C File No. 1709864  
Appellate Case No - 2019-000460

Sarah Jefferies,

vs

Williken And Company,

and

Liberty Insurance Corporation,

**RECEIVED**  
AUG 29 2019  
SC Court of Appeals

Appellant,

Employer,

Carrier / Respondents

INITIAL BRIEF APPELLANT

I Certify that I have served the INITIAL BRIEF APPELLANT on Williken And Company and Liberty Insurance Corporation by depositing copy on it in the United State Mail, Postage Prepaid, August 26, 2019 addressed to their attorney of record, Jeffrey S. Jones, Wilson Jones Carter & Baxley, 872 S. Pleasantburg Drive, Greenville SC 29607.

August 26, 2019

Sarah Jefferies  
Sarah Jefferies  
Appellant  
Post office Box 161606  
Boiling Spring South Carolina  
29316

(864) 345-3688

Initial Brief Appellant From Administrative Tribunal  
The State of South Carolina  
In the Court of Appeals

Appeal from Appellate Panel  
South Carolina Worker's Compensation Commission  
Michael Campbell, Gene McCaskill, Melody James  
Commissioners

WCC. File 1709864  
Appellate Case No. 2019-000460

Sarah Jefferies

Appellant

Milliken and Company

vs.

Employer

Liberty Insurance Corporation

Carrier/ Respondents

### Proof of Service

I certify that I have served the initial brief appellant on Milliken and Company and Liberty Insurance Corporation by depositing copy of it in the United States mail, postage prepaid on August 26, 2019. Addressed to their attorney of record, Jeffery S. Jones, Wilson Jones Carter, & Baxley, PA. 872 S. Pleasantburg Drive, Greenville, SC 29607

**RECEIVED**  
AUG 29 2019  
SC Court of Appeals

  
Sarah Jefferies

Appellant  
P.O. Box 16106  
Boiling Springs, SC 29316  
(864)345-3688