

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

Appellate Panel of the Full Commission

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**RECEIVED**  
SEP 27 2019  
SC Court of Appeals

WCC Number: 1709864  
Appellate Case No.: 2019-000460

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Sarah Jefferies, Employee, ..... Appellant,

v.

Milliken, Employer,

and

Liberty Ins. Co., ..... Respondents.

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**RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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1. Decision and Order of the Appellate Panel of the Workers' Compensation Commission (hereinafter "Appellate Panel"), dated March 1, 2019.
2. Decision and Order of the Single Commissioner, dated April 26, 2018.
3. Order postponing Appellate Panel hearing, dated November 14, 2018
4. Order postponing Single Commissioner hearing (dated December 5, 2017, served December 6, 2017).
5. Administrative Order Dismissing Claimant's Request for Commission Review, dated June 4, 2018.
6. Order granting Motion to Reinstate Appeal, dated June 16, 2018.
7. Hearing Transcript Before the Appellate Panel, dated December 18, 2018.

8. Hearing Transcript Before the Single Commissioner (including exhibits), dated March 2, 2018.
9. Amended Brief of Defendants/Respondents to the Appellate Panel, dated November 28, 2018 (including letter serving same).
10. Brief of Defendants/Respondents to the Appellate Panel, dated September 13, 2018 (including letter serving same).
11. Claimant's Motion to Reinstate (dated June 8 and 14, 2018, served June 20, 2018).
12. Defendants' Response to Motion to Reinstate, dated June 28, 2018.
13. Form 59 (dated August 24, 2018, served August 31, 2018).
14. Form 30 (dated June 24, 2018, served August 14, 2018).
15. Form 30 (date uncertain, received by Commission on June 4, 2018).
16. Defendants' Submissions pursuant to Administrative Procedures Act, dated February 16, 2018, pages 1-128.
17. Defendants' Prehearing Brief (Form 58), October 25, 2017.
18. Form 50 (dated July 17, 2017, served July 31, 2017).
19. Form 51, dated August 29, 2017.
20. Letter from Defendants' counsel serving proposed Decision and Order of Appellate Panel, dated February 22, 2019.
21. Letter from Defendants' counsel serving proposed Order postponing Appellate Panel hearing, dated October 26, 2018.
22. Letter from Defendants' counsel serving Decision and Order postponing Appellate Panel hearing, dated October 26, 2018.
23. Letter from Defendants' counsel to Appellant serving proposed Decision and Order of the Single Commissioner, dated April 13, 2018.
24. Letter from Defendants' counsel to Commission enclosing proposed Decision and Order of the Single Commissioner, dated April 13, 2018.
25. Letter from Defendants' counsel dated April 19, 2018 regarding claimant's concerns with proposed Decision and Order.

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

September 25, 2019



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Jeffrey S. Jones  
Willson Jones Carter & Baxley, P.A.  
872 S. Pleasantburg Drive  
Greenville, SC 29607  
Attorneys for Respondents

THE STATE OF SOUTH CAROLINA  
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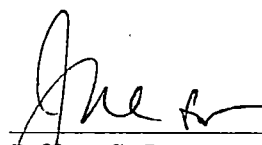
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**PROOF OF SERVICE**

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I certify that I have served the Initial Brief of Respondents on Sarah Jefferies by depositing a copy of it in the United States Mail, postage prepaid, on September 25, 2019, addressed to her at 1438 Boiling Springs Road, Apt. B, Spartanburg, South Carolina 29303.

September 25, 2019



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Attorney for Respondents

# WILLSON JONES CARTER & BAXLEY, P.A.

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September 25, 2019

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

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SC Court of Appeals

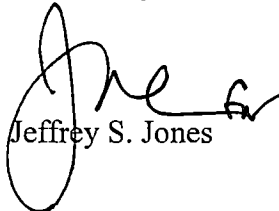
Re: Sarah Jefferies vs. Milliken and Company  
WCC File No.: 1709864 DOI: 6/22/2017  
Appellate Case No.: 2019-000460  
Carrier: Liberty Insurance Corporation - Claim No.: WC555 D64872  
WJC&B File No.: 0010.05006

Dear Ms. Kitchings:

I enclose for filing the Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal in the above-referenced case. By copy of this correspondence, I am serving a copy of the Initial Brief and Designation of Matter on the Appellant, Sarah Jefferies.

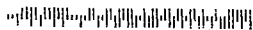
With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

  
Jeffrey S. Jones

JSJ/jcw  
Enclosures

cc: Ms. Sarah Jefferies (via certified and regular mail)  
Ms. Lauren Moeykens (via e-mail)



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SC Court of Appeals

THE HONORABLE JENNY ABBOTT KITCHINGS  
SOUTH CAROLINA COURT OF APPEALS  
P.O. BOX 11629  
COLUMBIA, SC 29211