

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEAL

APPEAL FROM SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Panel of the full Commission

WCC number: 1709864

RECEIVED

Appellate Case: 2019-000460

OCT 15 2019

SC Court of Appeals

Sarah Jefferies,

Appellant,

Milliken And Company,

Employer,

Liberty Insurance Corporation,

Carrier/Respondents

INITIAL BRIEF APPELLANT

~~Sarah Jefferies~~
Sarah Jefferies
Appellant

Post Office Box 1616c
Boiling Spring S.C. 2931

(864) 345-3688

ARGUMENT

On June 22, 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 consist of pushing a rack of yarn weighing @ around 100 pounds. While pushing this rack of yarn, it cause me to pull a socket out of my left hip. I followed the proper procedures by informing and reporting to my supervisor (Steven Logan) of my injury. He reported the injury to his supervisor (Michael Williams). Mr. Williams called the nurse (Ashley N Atchley) who was not @ 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. When I returned back to work on Monday and was able to see nurse (Ashley N Atchley), 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) or (Mr. Michael Williams). My conversation with nurse Ashley was basically discussing where my pain and how I was injured. (Pain in Pelvic area) page 51-53.

(2)

The plant had shut down for the week of July 4, 2017. After a week off my legs, relaxing them at home and not away on vacation (pg. 24 trying to change my word around). I returned back to work after shutdown, still trying to perform my job as directed and instructed. My legs still bothered me so bad that Steven and Mr. Williams put a co-worker with me to help me with my job. I hopped and still did my best working with tears in my eyes full of pain, until Mr. Williams came to me and suggested I go home. Because I was in so much pain that was August 23, 2017. The next day August 24, 2017 I called in to report off work because of pain and (Mr. Steven Logan) asked me to come in and see the nurse want see me (Sarah). In which @ that time, is when nurse (Ashley N Atchley) 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 that every day until I couldn't endure the pain no longer. I never had any previous hip problem in the past. I have all my medical records (primary family doctor) to show proof of statements.

on March 2, 2018, I turned In Statements Proof of Medical Records that was NOT Acknowledged on transcript But was started in Court And I have them Attached.

In 2014, I was Not Employed by Milliken and Company and that incident in questioning took place when I was Employed by Springfield (see page 51-51) That was concerning my right Leg, which was also injury from pushing a rack of yarn Because they don't never clean the wheel off Rack hard to push.

I have been Employed @ that Plant facility for 10 years During the 10 year of Service, I have been a big access to the Company. When they were short of help, I have step in as great team works by working plenty of overtime, switching shifts and agreeing to come in over in the early morning hours to keep machines running.

Therefore if suffered from previous hip or any other serious injuries I don't think I would have been able to put in so much effort to help carry out as many duties that I have.

• [DISCONTINUED] diclofenac (use for VOLTAREN) 1 % gel	Apply 1 application 100 g topically 4 (four) times a day. (Patient not taking: Reported on 10/7/2017)	3
• [DISCONTINUED] diclofenac (use for VOLTAREN) 75 mg EC tablet	Take 1 tablet (75 mg total) by mouth 2 (two) times a day.	60 tablet 0

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 ²

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

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STANDARD OF REVIEW

on June 22, 2017 got hurt at Milliken And Company. They never write a report on accident, I seen nurse on August 24, 2017. I had when to therapy that day on August 23, 2017 Steven Logan I called in I wasn't going to come to work (Steven Logan) told me the nurse wanted to see me at nine o'clock that morning on August 24, 2017, I came to work I was little late I went out there I talk to Ashley she asked me what was wrong with me I told her it was my hip and I told her I had been to doctor and the said he was going to recommend surgery. Milliken and Company put me on light duty on August 24, 2017 I walk in and out everyday with a cane stick and so much pain everyday until I couldn't walk anymore Sept 20, 17

CONCLUSION

The reason set forth above. Appellant respectfully request Appellate Panel's. Want my case Be heard and handled with fairness and Acknowledge. To Acknowledge my injury WAS At Milliken And Company.

~~Sarah Jufferies~~
Sarah Jufferies
Appellant

Post office BOX 161606
Boiling Spring SC 29316
864-345-3688

October 8, 2019

THE STATE OF SOUTH CAROLINA
IN The Court of Appeals

APPEAL FROM SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Panel of the Full Commission

WCC Number: 1709864
Appellate Case No: 2019-000460

Sarah Jefferies

Milliken And Company

Liberty Insurance Corporation

V.

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OCT 15 2019

AND SC Court of Appeals

Appellant,

Employer,

Carrier/Respondents,

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant on Milliken And Company And Liberty Insurance Corporation by depositing a copy of it in the United States Mail, postage prepaid, on October 8, 2019 addressed to their attorney of record, Jeffrey S Jones, Wilson Jones Carter & Baxley, PA, 872 S. Pleasantburg Drive, Greenville SC 29607

October 8, 2019

Sarah Jefferies
Sarah Jefferies
Appellant

Post office Box 161606
Boiling Spring SC 29316

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Panel of the Full Commission

WCC Number: 1709864

Appellate Case No: 2019-000460

Sarah Jefferies

V.

RECEIVED Appellant,

OCT 15 2019

Milliken And Company

And

SC Court of Appeals Employer,

Liberty Insurance Corporation

Carrier/Respondents,

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant on South Carolina Workers Compensation Commission by depositing a copy of it in the United States Mail, Postage prepaid, on October 8, 2019 addressed to their attorney of record, Jeffrey S Jones, Wilson Jones Carter & Baxley, PA, 872 S. Pleasantburg Drive, Greenville SC 29607

October 8, 2019

~~Sarah Jefferies~~
Sarah Jefferies
Appellant
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Boiling Spring SC 29316
(864) 345-3688

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Court of Appeal
1220 Senate Street
Columbia S.C. 29201

RECEIVED
OCT 15 2019
SC Court of Appeals

Re: South Carolina Workers Compensation Commission
WEC file NO: 1709864
Appellate Case NO: 2019-000460

I Enclose for filing the Initial Brief of Appellant
Designation of Matter to be Included Record on Appeal.
I am serving copy of the Initial Brief and designation
of matter to South Carolina Workers Compensation
Commission.

Sarah Jefferies
Sarah Jefferies
Appellant

Post Office Box 161606
Boiling Spring SC 29316
(864) 345-3688

cc: South Carolina Workers Compensation
Commission

October 8, 2019

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

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SC Court of Appeals

Re: Sarah Jefferies v. Milliken And Company
WCC File No: 1709864
Appellate Case No: 2019-000460

I enclose for filing the Initial Brief of Appellant
Designation of Matter to be Included Record on Appeal.
I am serving copy of the Initial Brief and designation of
Matter to their Attorney Jeffrey S. Jones

cc: Jeffrey S. Jones

Sarah Jefferies
Sarah Jefferies
Appellant
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Boiling Spring SC 29316
(864) 345-3688

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FROM: Sarah Jefferies
P.O. Box 161606 SC Court of Appeals
Boiling Spring S.C. 29316

TO: Court of Appeal
1220 Senate Street
Columbia S.C. 29201