

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEAL

APPEAL FROM SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

Appellate Panel of the full Commission

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WCC number: 1709864

Appellate Case: 2019-000460

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SC Court of Appeals

Sarah Jefferies,

v.

Appellant,

Milliken And Company,

and

Employer,

Liberty Insurance Corporation,

Carrier/Respondents,

INITIAL BRIEF APPELLANT

~~Sarah Jefferies~~  
Sarah Jefferies  
Appellant

Post Office Box 161606  
Boiling Spring S.C. 29316  
(864) 345-3688

## STATEMENT OF THE ISSUES ON APPEAL

- I. Did the Appellate Panel of South Carolina Workers Compensation Commission Have Jurisdiction to hear Appellant Appeal of the Single Commissioner's order?
- II. Does the Record on Appeal contain substantial Evidence Requiring Affirmance of the Appealed order?
- III. Did the Appellant Prove Proximate Cause?

## STATEMENT OF THE CASE

Appellant is not represented. On July 19, 2017 the Appellant filed a form 50, Request for hearing. Appellant sustained injury to her left hip and left leg and Pelvis as a result of pushing racks of yarn and bag of waste at Millike & Company on June 22, 2017.

May 29, 2018 The South Carolina Workers Compensation Commission received notice from Liberty Insurance Corporation denies workers compensation benefits.

Immediately prior to single commissioner hearing. Appellant was informed of her right to attorney and the hearing was postponed to be reset before the next jurisdictional commissioner. Appellant did not retain an attorney.

A hearing was held before Commissioner Avery B. Wilkerson, JR, (hereinafter) single commissioner) March 2, 2018 to determine the issues outlined in the parties form 50 and

At the hearing it was appellant that she injury to her left hip and left leg and Pelvis on June 22, 2017.

As pushing Rack of yarn and bag of waste at Milliken and Company. June 22, 2017 At time my DR. Rollins had sent Liberty Insurance Corporation they Refuse to pay for the surgery. My family Doctor Ruffing Sent medicare paper to Court and they filed and told Commissioner I were hurt on that Job at Milliken & Company. On April 26, 2018 the Commission mailed the Decision and order to the Appellant. Appellant on April 26, 2018 never recieve the Decision and order. Appellant Recieve a form 30 on 6/1/18 for motion to Reinstate. On June 20, 2018 Appellant recieve a form 32 submitted requesting to waive fee was approved. Appellant filed a form 59 Informal Brief with this Commission on August 24, 2018, on August 31, 2018 the Commission served a copy of the Appellant form 59 on the Respondent, and that Correspondence was received by the Respondents on September 4, 2018. Appellant form 59 they removed the Commissioner Avery B. Wilkerson JR, removed from case they said Commissioner want Be handler that case they said filing date for Appellant Brief September 16, 2018 The claim was set for hearing on October 23, 2018 before the Appellate Panel of the South Carolina Workers Compensation Commission (hereinafter Appellate Panel) At that time the Appellate Panel Allowed the Appellant a second opportunity to obtain an attorney. and the appeal hearing was pontponed for that Purpose. The Appeal hearing was reset for December 18, 2018 Appellant appeared without a attorney, and the appeal.

went forward, on March 12, 2019 Appellant filed a Notice of Appeal to this Court. On March 22, 2019 this Court issued a letter concerning the deficiencies in the Appellant Notice of Appeal on March 30, 2019 Appellant mailed a handwritten Notice of Appeal. Attempting to remedy the defect noted in the March 22, 2019 Correspondence from this Court. On April 10, 2019 this Court issued additional Correspondence to Appellant asserting the appeal contained continuing deficiencies, and the appeal will be dismissed unless the Appellant remedied the deficiency. On May 6, 2019 this Court issued an Order dismissing the Appellant Appeal for failure to remedy the deficiencies noted in its previous Correspondence to Appellant appeal contained continuing deficiencies and the appeal will be dismissing the Appellant appeal for noted in its previous Correspondence. Appellant filed a motion to reinstate on July 19, 2019 this Court Issued an order to reinstate the appeal. On August 26, 2019 Appellant filed an Initial Brief and Proof of Service. On September 11, 2019 this Court Issued a letter noting deficiencies in the Appellant Initial Brief and requesting remedy of those deficiencies within 10 days. On October 22, 2019 this Court Issued a letter noting deficiencies in Appellant Designation of Matter Proof of Service requesting remedy of those deficiencies within 10 days.

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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WCC number: 1709864  
Appellate Case No: 2019-000460

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Sarah Jefferies

Appellant,

v.

Milliken Employer,  
and  
Liberty Ins. CO

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SC Court of Appeals

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 state mail. Postage Prepaid, on November 11, 2019, addressed to Jeffrey S. Jones, Wilson Jones Carter & Bailey, PA. 872 S. Pleasantburg Drive, Greenville SC 29607

November 11, 2019

~~Sarah Jefferies~~  
Sarah Jefferies  
Appellant

Post office Box 161606  
Boiling Spring SC 29316

NOVEMBER 11, 2019

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

Re: Sarah Jefferies v Milliken And Company  
WCC File NO: 1709864 DoI: 6/22/2017  
Appellate Case NO: 2019-000460  
Carrier: Liberty Insurance Corporation

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SC Court of Appeals

I enclose for filing the Initial Brief of Appellant and Appellant Designation of Matter to be Included in the Record on Appeal in above-referenced Case. By copy of this correspondence, I am serving a copy of the Initial Brief and Designation of Matter on the Respondents Attorney Jeffrey S Jones.

~~Sarah Jefferies~~  
Sarah Jefferies  
Appellant

Post office Box 16606  
Boiling Spring SC 29316  
864-345-3688

cc: Jeffrey S. Jones

To my Concern:  
Sent the Statement of Appeal

Thank you,

Sarah Jeffries

864-345-3688

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SC Court of Appeals

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## PRIORITY MAIL



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Sarah Jefferies  
P.O. BOX 161606  
Boiling Spring S.C. 29316

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

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