

Reply Brief Of Appellant

The State Of South Carolina

In The Court Of Appeals

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SEP-03-2021

Appeal From Richland County

S.C. Workers' Compensation Commission

SC Court of Appeals

Commissioner(s): A. Taylor, T. Scott Beck, A. Wilkerson

Case NO. 2021-000696

S.C. Department of Mental Health
Employer, and State Accident Fund
Carrier

Respondent

V.

Dana L. Dixon
Employee

Appellant

Reply Brief Of Appellant

Dana L. Dixon

181 Stabler farm rd.

St. Matthew, S.C. 29135

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Appellant

Initial Reply Brief Of Appellant

On August 30, 2021 at 1:58 pm, I received Respondents Initial Brief.

And on page 1 of their brief Respondents have stated I was struck while assisting them in bed. (The S.C. Dept of Mental Health Witness Statement of Injury or Illness) Form that I wrote on 01/13/2017 (NO. 14) does not state that. Also on same page Respondents have stated that on 12/23/2016, I received NO additional authorized medical care for this accident, and no authorization prior to me going to Palmetto Health Richland, after all my supervisor never came to the unit to even give me the witness statement form to write (NO. 14) or the S.C. Dept of mental Health Workers Comp packet (NO. 18) like I had received the SAME day for my 01/31/2017 work injury with Supervisors signature.

The difference between my 2016 work injury and my 2017 work injury is this: 2017 I was sent to the doctor (NO. 63) the SAME day and there was and AUTHORIZATIONAL number 2-016, NOTHING was NEVER EVER done, including Respondents ^{NOT} paying for my MEDICINE. (NO. 55) And 22 DAYS later I received a call from Supervisor while I am home due to back pain, telling me I need to report to her office to write my statement. (NO. 14, NO. 15)

On 03/05/2017 I was involved in a motor vehicle accident

On 03/07/2017, I went to Providence Hospital, NOT for my back as the Respondent wants YOU TO BELIEVE, but for NECK PAIN, (No. 58 listed in my Designation of matter), (No. 71)

On 9-7-2017, my then attorney did file (2) Form 50(s). One for 1623303 and 1712879. I no longer wanted him to represent me due to he would never return my calls to give me a status update, so when he mailed a copy of the form 50 for my 2016 work injury and he did not request a hearing (for my 9 months of suffering severe back pain) and for work injury of 2017 on the form 50 he listed the WRONG Body part injury after taking my RECORDED STATEMENT.

So yes I requested the termination of Attorney-Client relationship. Respondent states that I filed a Subsequent form 50 February 26, 2019 and it's possible. But I know that on 02/04/18

I moved to Charlotte, N.C. (And in order for my prior attorney to file paperwork (No. 49) (with my N.C. address on letter 2 days into March of 2018). I filed BOTH form

50(s) for 2016 & 2017 in March 2018 after receiving letter from attorney stating BOTH claims were CLOSED. I no longer spoke to my then attorney to give him my NEW ADDRESS.

Respondent have stated I Subsequently filed a form 50 on 02/26/2019 (I wished they had submitted it) and again (No. 82) on November 27, 2018, (and I do believe they had another date as well) July 8, 2019. Which is it? I know as well.

as the respondents it had taken months for me to get a hearing for example when I went before Commissioner Campbell (No. 36 bottom) On June 11, 2019 it was postponed. Then on October 18, 2019 I went before Commissioner Burden (No. 38) it didn't go forward due to No Form 20 for my 2014 injury.

Then a hearing was on the docket for April 01, 2020 (No. 19) it was cancelled due to Covid. Then June 12, 2020 had a hearing the last 2 was with Commissioner James. Then I filed form for an appeal for full panel Commission. That hearing was February 22, 2021. The respondents have CLOSED the cases several

times, (No. 7). The respondents have listed several dates that I supposedly have filed form 50(s) and after filing motions to add and form 50(s) from 2018 to 2019, 2020 I don't recall the dates. But if I were to have mentioned them (Form 506)

I would have submitted them, so it would not seem as if I am making accusations. And each time afterwards I had to file another form 50.

- Page 2 of Respondents Brief, states that the single Commissioner issued an order in which she reached the following finding of fact and conclusion of law:

Well for starters #4 is NOT correct. (#2), TR.p. 5 L. 13-25 TR.p. 4 L. 1-23 (of June 12, 2020) Commissioner James Order Instructions does not list a compensation rate. And the form 20 Respondent gave (No. 33) to the Commission IS from 2017 work injury. (#34) is the form 20 that was filed in 2020.

• Respondent ^{#8} has stated this LIE several times over by stating "THE APPELLANT WAS DISCHARGED WITH NO RECOMMENDATION OF FURTHER CARE" (NO. 12) (TR. p. 28. L. 1-5, TR. p. 18. L. 21-25, TR. p. 19. L. 1-4) (NO. 28.)

• Respondent #9 is ABSOLUTELY Correct. (#5. 35-41. L. 6, 11) Respondent NEVER paid for my prescription that I had filled at CVS on 12/23/2016 (#55) nor felt the need to reimburse me for something that is listed in 42-15-60(a)

• Respondents #11 date is wrong. I went to Providence E.R. on 03/07/2017. (The Respondents are making a habit of listing WRONG DATES) Respondents have had my medical record since 01/2017 (#31) and again in 03/13/2019 (#32) and continues to list wrong dates.

Just in case the Respondents does not know, when a person goes to the E.R. Complaining of NECK PAIN 9 times out of 10 the doctor will Order X-Rays of upper and lower back. Due to the stem of the spine is located at the BRAIN stem (bottom and ends at the lower back. (Cervical-Neck)

(Thoracic-upper, middle part of back, -spine). On the 11th page of #57 it states, "you were seen in the ER. on 03/07/2017 For: NECK PAIN"

I have often wondered why respondents never mentioned X-Rays from 12/23/2016 E.R. visit, since that was one of the 3 reasons (neck, jaw, back) I went. And after going through medical record I didn't see anything pertaining to X-Rays (I thought respondents removed them) I went in person to Records (medical) to ask for a copy and the findings of 12/23/2016 E.R. visit, and I was informed that there are NO X-Rays or finding for 12/23/2016. (# 75)

the form states I was given 30mg IM Toradol in the E.R and doctor discussed with me about work duties, wrote 2 prescriptions Naproxen, Flexil." I can't remember how I got home, or anything else after the shot. So basically I went to the E.R. in severe pain, was evaluated, NO X-Rays, received a shot of a NARCOTIC and sent home. (# 60)

- o Page 3, # 14 states a form 50 was filed on 02/26/2019, that don't seem to be logical, it could be the case, but due to w.e.c. file no. 1712879 case was beginning 01/16/2019 (# 74) and me having to write briefs, file motions and go to subpoenaed depositions (# 65) and gathering evidence and trying to show the lower court respondents lied about ^{not} receiving the subpoenaed medical records, when the records were certified mailed to me (# 43) with the EXACT date of the pre-hearing brief. (# 42) I received them after arriving back from my deposition of my 2017 work injury where respondents questioned me about my 2016 work injury. T.R.P. 45. L. 14-25

TR.p. 46.L.1-2. And looking at the form 51(s) and form 58(s) I've received from Respondent I do not see a form close to that date. What I do know for certain is that after my deposition and the hearing of my 2017 W.C.C. Claim No. 1712879 the Respondent filed a form 51 on APRIL 02, 2019 (#35) for this claim, and violated SECTION 42-1-705 (b) that (c) states it is proven to the satisfaction of the Commissioner that the Defendants had no knowledge of the facts supporting the defense on the date of the completion of the form 51. (TR P. 45.L.14-25, TR.p. 46.L.1-2)

History 2007 Act No 114, pt 1 Section 10 eff July 1, 2007

- #15 Respondent states that I am currently requesting treatment for my back. Facts are: on 01/13/2017, was the first time I thought I was going to get treatment after I wrote my statement. Did NOT happen. The second time was after I wrote my statement I received a letter dated 01/18/2017
- (#16) NOTHING HAPPENED, NOTHING. I have went as far as begging my supervisor to call whom ever so I can go to doctor for my back, and the Respondents have went as far to say I am wanting additional medical treatment, when I NEVER received 42-15-60(a) from date of injury. It will be 5 years this coming December.

• Respondents #16 is WRONG. If they can state what page of My. APA the letter is located then they should know that the LAST 2 numbers of the year is wrong and especially when they have a visual aid. (The actual letter with DATE.) So therefore Dr. Saunders letter could NOT reference the workplace assault since the letter (#26) is dated July 17, 2019. An Dr. Saunders Office is located in Charlotte, N.C. I was seen in the E.R. on December 23, 2016, TR. p. 34. Lines 22-25, TR. p. 35. Lines 1-24. (02/22/19-tr)

• Respondents #18 is INVALID, Respondents changed the year of the letter. (#26).

• Respondents #19 states "Based on the greater weight of the evidence" "Evidence" is what I have been wanting the Respondents to SHOW for my 2016 claim. Evidence such as the name of the person whom they gave authorization to. The authorization or claim number. A document stating workers' compensation in 2016.

The Respondents states I received authorized medical treatment on December 23, 2016, when in fact I should have received it on December 23, 2016. Respondent have lied and stated I was discharged without further recommendation of medical treatment, even after receiving a copy of the physician Discharge Summary (#12) 7.

I listed AS my APA And read On record June 12, 2020.

① Respondents did not pay for my medicine of December

23, 2016, (42-15-60(A)) ② Respondents request my medical records in January 2017, did NOT send me a copy

() Then on February 27, 2019

③ Respondents uses Subpoenas to retrieve medical

records for 2017 hearing, asking that records be

MAILED on or before March 13th 2019. But the

hearing was set for March 07, 2019, then use

the same records for this claim. Respondents

Violated Section 42-1-705 by obtaining facts before

completing their form 51. ④ Respondent changed what I

wrote in my witness statement and added their own

words. ⑤ Have changed the date on letter from

Dr. Jerry Saunders. ⑥ Gave Single Commissioner the wrong

form (2017) ⑦ Respondents states that I filed 3-4 form

50(s) but don't submit any. ⑧ The Respondents states "The

period for which back pain could be claimed has lapsed due

to lack of treatment. If the E.R. Doctor Discharge

Summary of December 23, 2016 instructs me to

contact my doctor immediately and the Respondents

have chose to ignore the summary and NOT

allow me to receive treatment after day one

and due to Respondents denying me (#5 35-40)

How was I to receive treatment?

The Respondents have stated I had authorized treatment on 12/23/2016. But failed to file a First Report and AFTER the Commission wrote them a letter (#27) is when the Respondent filed their (#28) first report dated 09/25/2017 for this claim.

Respondents did NOT file a form 20 until 01/2020. 3yrs 1 month after. But gave the 2017 form 20 to single Comm. (#

And. due to lack of evidence from the Respondents for this claim, Respondent want it to appear I went to the E.R. on 03/01/17 for back injury, when record show I was there for neck pain. Also on 03/06/2017, I went to work (light duty) and to my doctor appointment for my 2017 work injury (#71) Paperwork was faxed to Respondents. And I am sure if the doctor would have notated a back injury on 3/6/2017 Respondents would have submitted that as their APA.

So realizing that Respondents did NOT provide the required documents until years later, should be an indicator of me NOT having received medical authorization on 12/23/2016. But by me NEVER speaking^{to} or seeing my supervisor the night of 12/22 or 12/23 2016 or receiving the MANDATORY required forms like I did for my 2017 work injury that

Respondents used as their APT for that hearing) to show a paper trail, so by there NOT being ANY EVIDENCE, how did the Respondents know I was injured when My Supervisor at C.M. Tucker Didn't. So based on the greater weight of the evidence I've provided at the lower Court and this Court I would find that my request for treatment should be granted.

Page 4 of Respondents Brief. #6, #8
Respondent have listed S.C. Code Ann. 42-15-60 (b)(3) which states Employer shall NOT be required to provide medical treatment when there is A LAPSE in treatment. In the Respondents forms 51, 58 (#s 36-41 lines 6, 11) they have stated that I received NO Authorized medical treatment since 12/23/2016, and even with their Lie of me having authorization for medical treatment the doctors from Palmetto Health Richland where Respondents ALLEGEDLY had sent me recommended (# 12) further MEDICAL TREATMENT. So either way Respondents would NOT authorize me going for medical treatment and to date is now saying there was a lapse in treatment.

Page 4 of Brief. The Respondents have stated that I filed a form 30 to ADD additional evidence of a form titled: Employee/Supervisor Notification dated 02/03/2017. A form that I hand delivered along with other documents to be used as my APA(s) it was to be used in my 2017 claim to show that Respondents submitted the SAME form with doctor instructions of me being out of work from 01/31/2017 til 02/08/2017 dated 02/01/2017. This form was faxed to Supervisor, I NEVER received it. therefore the form is void of my signature.

On 01/31/2017 Respondents called me to let me know that I was to REPORT to my NEW modified light duty location at Bryan A&D on Faison Dr at 8:30-5:00pm, on 02/01/2017. I wasn't able to go. Respondents called me on 02/02/2017 telling me I was to have reported at 8:30 am. And if I did NOT show up that morning I could be terminated. I clocked in at 10:30 am. On 02/03/2017 Respondents GAVE ME The Employee/Supervisor Notification form to sign and I did. But the form they gave me was void of Doctor instructions. So for me to file a form 30 to Add a document of my 2017 claim to this claim is crazy on my behalf. I still have emails where Judicial Copied Commissioner Wilkerson receptionist 11.

telling her that I wanted them added. That NEVER happened I know I have filed several times before trying to get that document entered into evidence. TR. p. 4, L. 7-11. (# 11, #79 pages 316, 317) and for the times that I filed a motion was for my 2017 claim and I added Commissioner Beck decision forms as my Designation of matter. (Denied) and the same wording for my motion was used in Respondents Reply Brief "document that was construed as a motion for additional evidence" also listed in my Designation of matter for claim no. 2021-00121. If I did file a form 30 it was not intended for this claim.

In Summary of The Evidence, Respondents states I also produced an unnumbered stack of documents which had not been presented prior to the hearing. (#19) That's a lie. My APA documents were stamped (TR. p. 19, Lines 12-25) RECEIVED MARCH 13, 2020 W.C.C. And the hearing was set for April 1, 2020. I have NEVER handed any documents out in the court room. (TR. p. 22, L. 11-24)

The Respondent listed TR. p. 24 Lines 24-25 of me stating "I have been doing CNA type work off and on starting in October 1988 (Single Comm) The very first time I said those words were 02/22/2019 at my subpoenaed deposition TR. p. 5, Line 12 (Evidence of The Case). (# 9)

Initial Reply Brief of Appellant

Page 5 of Respondents Brief States "Appellant testified that she had never since 1988, I've never had a workers' Comp claim." TR.p. 63. L. 10 TR.p. 38. L. 8-15, TR.p. 40. L. 21-25, (2-22-19 Tran.) TR.p. 34 Lines 14-19, TR.p. 26, L. 2-20. The Respondents is (TR.p. 26. L. 1-24) desperately trying to make me out a LIAR, I was the one who stated the workers Comp claims on 02/22/2019 at my Deposition, and I OBJECTED to the same statement on 06/12/2020.

The Respondent makes mention "that I testified that I was injured by a resident I've never sat with at the hearing on 6-12-20. But on Respondents First Report filed 9-25-17, the form (# 28) states "I verbalize first time working on this unit," This was NOT my assigned unit.

Respondent referenced TR.p. 2, Lines 5-11 and more stating I testified I went to Richland Memorial Hospital on 12/23/2016 for medical treatment was diagnosed with muscle spasm (TR.p. 27 L. 18-19). THERE IS NO Page 2 of transcript. TR.p. 15 Lines 10-12 is NOT me testifying that I received no forms while there save for a medical excuse, it me stating I submitted into evidence (TR.p. 15, Lines 8-16) (#12, #13).

Respondents have stated I provided several varying recollection of car accident. Tr. 19. Lines 9-11. and other transcript references. The Respondents continues to state I complained of pain in NECK and BACK. But in the same medical record Respondents used as their APA (#58 in my designation of matter) states NECK PAIN. And on 03/06/2017 I was able to go to my new modified transitional light duty (oilspill work injury) job and to the Dr. of Respondent choosing (#71).

— On the BOTTOM of page 5—

Respondents states I have made several allegations that the records from 12/23/2016 provided that she needed ADDITIONAL medical treatment. And other stuff.

First, the physician's Discharge Summary is dated 12/23/2016. It's tangible and it is not an allegation and it was then is now and forever ^{will} be a part of my medical record.

Secondly, I feel that Respondents saw the DISCHARGE Summary in 01/2017 (#12, #31) that states for me to contact my doctor immediately for continued and complete medical diagnosis, care and treatment. And turned a blind eye to the Summary

Of 12/23/2016. If this Court was to review EVERY document Submitted at the Lower Court and this Court you would NOT find I mention of the physician Discharge Summary, Only the repeated Mentioning of 03/07/2017 E.R. Visit to Providence Hospital and the X-Rays. So if I've begged, pleaded with my Supervisor to Contact Whomever so I could go to the doctor for my back, how was I to receive Medical treatment if it wasn't Authorized?

I Can put BOTH Hands on a Stack of Bibles while Standing before God and say on 12/22/2016 through 12/23/2016 The Respondents NEVER Contacted me or any one else to give Authorization for medical treatment. I went to Richland Memorial E.R. of my own Authority. That is also the reason Respondents Continue to say that I make Accusations and Allegations. I Love Law, and if I've learned NOTHING else is this: TANGIBLE PROOF in hand is a lot more powerful, than allegations or accusations or lies. ME personally I hate liars and when you lie you have to KEEP lying to cover the first. So I don't lie.

And it would have been awesome if Respondent would have listed the actual allegations and NOT where I stated the record of 12/23/2016 stated I need Continued

And Complete medical treatment and then I list
where it's stated, is not an allegation that would
be considered Proof. Now the fact that Respondents
stated I made the ALLEGATION would be considered
A Lie.

On 02/22/21, Commission Taylor did ask
the question and at the time I did not give an
answer. But what I wanted to ask was did they
actually review ALL of the documents, I had submitted
but didn't due to it might have been inappropriate, so
I said nothing. And I don't think the Commissioner
phrased the question like the Respondents wrote it
in their brief. (02-22-21 tr.) TR.P.

- At the bottom of page 16, Respondents have made
it abundant clear that I am pro-se, as well as
myself with EVERY form that I have filed. The
Respondent is making sure that each Court knows
that I do not understand the procedures and law.

But if S.C. W.C.C. didn't have a problem with my
documents or any other issues and if Court of
Appeal has any issues they send out deficiency
letters, why is the Respondent so against me being
pro-se?

"unfamiliarity of the law is not an excuse" me personally I feel that I am holding my own (pro-se) When I refute what the Respondent has said, Respondent changes the words, or states I did not like the Commissioner's decision so I filed with this Court or just simply lie. Respondent should know this fact: I know as well as God Almighty that Respondents DID NOT authorize any medical treatment on 12/23/2016. And yes I am aware of the potential issues that can arise in me being pro-se. But I have tried to contact an attorney; but by being told "it's too far out" by 45 different attorneys left me NO choice. So the choices I was left with was do nothing and sit on the side line and complain, or defend my self. I chose the latter.

The Respondent has used these words "articulate arguments" for whatever reason. But here we are at Court of appeals.

* The Respondent changed the word from IS incorrect to believe the transcript reference (TR.p. 6, L. 3-4) of 12/22/21 transcript.

I feel that if the Respondent spent the energy to state the truth and the facts or show evidence or NOT change dates, or add words in their brief when the document does not state what respondents wrote in their brief, or criticize my brief and let the case manager tell me what can and cannot be and the C.O.A rules.

Examples:

- The Order instructions of Comm. James does NOT list weekly compensation, but the Order does. (# 1, page 2 line 7)
- The wrong date added to letter of Dr. Saunders (#26)
- Used their words of what I wrote in witness statement (#14)

and there are others. And for the record the listed is NOT accusations or allegations it's tangible PROOF.

On page 7 of Respondent Brief in Standard of Review line 7 it states "inconsistent Conclusions from Same evidence" There is no inconsistent Conclusions due to the lower Court did not review the Substantial evidence that I had Submitted, If they had they would have seen the Physician Discharge Summary (# 12) Or the fact that Respondent changed the date of letter (# 26) Or would have asked the question as to why was the Form 20 (# 33) that was given to Comm. James filed in another Claim. Why havent a Claim number or Authorization number been Submitted by Respondents EVER. Just to list a few. And One question I would love to get an answer to is, in the Order it states that On June 12, 2020 I HANDED UP an un-numbered Stack of Documents. Question: If the APA documents that I used IS Stamped Received On March 13, 2020 how did I hand up?

The Respondent also stated "where there are Conflicts in the evidence over a factual issue, the finding of the Appellate panel are Conclusive". page 7, then on page 8, Respondent states "By in large, the questions found in Appellant's Brief ARE factual in nature."

In the Respondent's ARGUMENT⁴

The Respondent has stated that I continue to provide accusations both implied and bluntly stated and other statements. But for the Respondent to state (by me owning my truth, providing tangible documents) I am calling their character into question.

1. If there is a Physician Discharge Summary that's dated 12/23/2016, that instructs me to contact my doctor IMMEDIATELY for further medical treatment that was and is in the SAME medical record Respondent received in 01/2017, and SAME medical records Respondent subpoenaed on 02/27/2019. And Respondent states "there is NO evidence in record to support this allegation." 2. Or the fact that Respondent gave Comm. James wrong form 20, knowing that a form 20 for this claim was filed in 03/2020, added a weekly comp rate in the order when the Commissioner didn't, changed the date of letter from Dr. Saunders to make it appear as if he was doctor of record in 2017. To state that I stated I NEVER filed a workers comp claim, when I am the person who testified about workers comp claims on 02/22/2019 at deposition 20

hearing (Subpoenaed). Include WRONG Transcript References And Page numbers, And the Statement that I had Authorization for Medical treatment on 12/23/2016, But HAVE NOT provided 1 document for 2016 Or And Authorization Number And due to Respondents NOT being able to, they paid the E.R. bill On 03/14/2017 (#21) After receiving Medical records by their letter REQUESTING them for (letter dated 01/18/2017, Received 01/19/2017) PAYMENT purposes. (#20) And paid 9 weeks 6 days later, if I had Authorization then (42-15-60A) I would not have had to pay for my medicine on 12/23/2016. Respondent stated on June 12th at Single Comm hearing that the amount paid \$618.90 "The respondent stated (TR. p. 32 lines 18-25) there's ^{I stated} no Authorization Rating" I Can't find where I stated that in the 06/12/20 transcript. And I did NOT know there was a thing called Authorization Rating. If so I find it strange that there is one, But No Authorization Code for Medical Authorization of 12/23/2016. And the amount Respondent listed is WRONG. (#21) The itemized Statement does not SHOW \$ 618.90. (#5 20-23) Where is that listed?

Or Writing in their brief (this one) on page 6. Line 15-16.

"When asked by the panel in what way the facts and statements she made hurt HER claim. When on page 7 of the 2-22-21 transcript, lines 20-25, Tr. p 8. Line 1.

So by me Reading and providing EVIDENCE that refutes what Respondents have stated and let it be known THEY LIED Then Respondents states it's Baseless Accusations.

But what Respondents apparently fails to realize is this. This is my BACK injury that occurred while I was employed by Respondents. And due to NO Medical Anything from 12/22/14-Present I have SEVERE Back pain, have NOT been able to work, stand, walk for long periods of time. And my life has changed drastically. So NO I don't have the time to make accusations or allegations. And if me being blunt hurts any one's feelings then I Apologize. But with everything I've listed that pertains to Respondents Character should SPEAK for itself.

I hate a liar and I hate when someone lies on me, especially when I know they are.

Respondent has maintained the LIE of them
giving Medical Authorization on 12/22/2016.

I Really wish the Respondents would tell the
TRUTH and SHAME the DEVIL.

I guess I will ALWAYS wonder what kind of Super
powers the Respondents had on 12/22/2016 to know
that I was going to be "Attacked" in order to
give Medical Authorization on 12/23/2016.¹ Due to
Supervisor NEVER came to unit I was working on.² I
was NEVER given any documents (Witness Statement, B.C.
Dept of mental Health W.C.I. packet like on 01/31/2017)

3. I wrote a Statement 22 days AFTER work injury. (1-13-17)

4. I received a letter informing (from Carrier) me they
had received my work injury Report from my Employer
(letter dated 1-18-17)

5. The Respondents filed the first Report on 9/25/2019,
after the Commission had to send the Respondent
a letter dated 9/14/2017. ⁶ Filed a form 20 in 03/20

7. ASK me in detail about work injury of
12/22/2016 at deposition (02/22/2019, for my 2017
work injury. ⁸ Then after hearing files a form 51, dated
04/02/2019. (hearing was in March 07, 2019.) for this
claim. Section 42-1-705(B) was violated by Respondent
(when they filed their form 51) History 2007 Act No. 111,

pt 1 Section 10 eff July 1, 2007

So How did I receive Authorization?

I know that when we are born we get an assigned number on Birth Certificate. When we go to the Hospital, dentist, Car lot, property, Uber, Uber eats, Credit Card, Debit Cards, Banks, Airline tickets and even the TOE TAG in the Mourge we all have Assigned Numbers. So I find it hard to believe that there is not 1 form showing Authorization #, the person name who gave Consent on any form from 12/22/2016. There aren't any forms from 2016.

Respondents DID NOT SEND me for more Medical treatment as the Discharge Summary instructed me from E.R. Visit of 12/23/2016.

And by Respondents Own Admission I never received Authorized medical treatment since 12/23/2016.

So with me going to Palmetto Health Richland of my Own Choosing or with the alleged allegation of me being sent there, by Respondents ACTIONS either way I was NOT going to receive Authorization from Respondents for medical

treatment. The Respondents decided to go against what the actual doctor instructed and now states #3 of page 2. And that I am requesting additional treatment. I was not ever sent to a doctor or anywhere else with authorization.

* The # Sign listed is reference to Designation of matter I've listed for this claim.*

Proof Of Service Of Appellant Reply Brief

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Commissioner(s): A. Taylor, T. Scott Beck, A. Wilkerson

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S.C. Department of Mental Health, Respondent
Employer and State Accident Fund
Carrier

Dana L. Dixon, Appellant
Employee

PROOF OF SERVICE

I Certify that I have served the Reply Brief
on M. Stephen Stubley by depositing a copy of it in
the United States mail, postage prepaid on
2021. Addressed to attorney of record M. Stephen
Stubley at his office 1122 Lady Street, Columbia, S.C.
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