

COPY

IN THE COURT OF APPEALS OF THE STATE OF MISSISSIPPI

GWENDOLYN JENKINS SIMPSON

APPELLANT

V.

NO. 2008-CP-01449

STATE OF MISSISSIPPI

FILED
JAN 15 2009
OFFICE OF THE CLERK
SUPREME COURT
COURT OF APPEALS

APPELLEE

BRIEF OF THE APPELLANT

MISSISSIPPI OFFICE OF APPEALS

Betty W. Sephton (Clerk)

Post Office Box 249

Jackson, Mississippi 39205-0249

Telephone: 601-359-3694

Gwendolyn Jenkins Simpson (Appellant)

5014/28th Street #1613

Gulfport, Mississippi 39501

Telephone: 228-383-6400

**SUPREME COURT OF MISSISSIPPI
COURT OF APPEALS OF THE STATE OF MISSISSIPPI**

GWENDOLYN JENKINS SIMPSON

APPELLANT

V.

NO. 2008-CP-01449

STATE OF MISSISSIPPI

APPELLEE

CERTIFICATE OF INTERESTED PERSONS

The undersigned appellant certifies that the following listed persons have an interest in the outcome of this case. These representations are made in order that the justices of this court may evaluate possible disqualifications or recusal.

1. Julie Tillman Watson (Defendants)
2. Tillman Furniture Company (Defendants)
3. Ms. Whitney Gladden (Defendant's Attorney)
4. Honorable Lamar Pickard
5. State of Mississippi
6. Fedena Hall (Witness in Deposition)
7. Dr. Diane Ross
8. Jennifer Culver
9. Mrs. Queen Esther Jenkins
10. Willie B. Smith

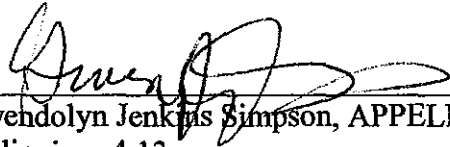
11. Carolyn Lagasse

12. Sherry Davis (Judge Pickard's Assistant)

This day of our Lord the 15 day of January, 2009.

Respectfully Submitted,
GWENDOLYN JENKINS SIMPSON

BY:


Gwendolyn Jenkins Simpson, APPELLANT
Philippians 4:13

MISSISSIPPI OFFICE OF APPEALS
Betty W. Sephton (Clerk)
Post Office Box 249
Jackson, Mississippi 39205-0249
Telephone: 601-359-3694

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TABLE OF AUTHORITIES

CASES

Supreme Court of Mississippi: Appeal #5068

1. Owner knew of defective merchandise

Brenda Tate v. Southern Jitney Jungle Company, 650 So. 2d 1347; 1995 Miss. LEXIS 37

2. Case #2002-CA-00273-COA

Catherine L. Young, Appellant v. Wendy's International, Inc. and Wenstar, Inc. X,Y,Z, Appellee, 840 So. 2d 782; 2003 Miss. App. LEXIS 190

*** Civil Procedure > Summary Judgment > Standards > Genuine Disputes
[HN1-7]; [P1-7]
[P8-10] *** Refer to FACTS Attachments: Pages

Reversed and Judgment Entered for Appellant

1. Store Owner Duty; Torts > Negligence > Duty
Torts > Premises Liability & Property > General Premises Liability;
Dangerous Conditions > Obvious Danger;
[HN1-HN2*]; [HN3-7]; [HN11]

Romain Wilson v. James C. Allday, ET AL., 487 So. 2d 793; 1986 Miss LEXIS 2433

Civil Procedure & Genuine Dispute

Ruby C. Smith Plaintiff -- Appellant v. Federal Cleaning Contractors Inc Defendant -- Appellee
126 Fed. Appx. 672; 2005 U.S. App. LEXIS 5184
[HN1-4]

Standard of Review [HN1]

Discussion [HN2]

**SUPREME COURT OF MISSISSIPPI
COURT OF APPEALS OF THE STATE OF MISSISSIPPI**

GWENDOLYN JENKINS SIMPSON

APPELLANT

V.

NO. 2008-CP-01449

STATE OF MISSISSIPPI

APPELLEE

BRIEF OF THE APPELLANT

STATEMENT OF THE ISSUES

I am not an attorney, yet, I am forced to defend myself for the incident occurring at Tillman Furniture Company on December 20, 2004. This filing is a result of several failed attempts requesting Tillman Furniture to resolve my medical bills and personal compensation for physical and emotional damages.

Due to Hurricane Katrina and having to evacuate to Florida, this case was delayed. A Pre-Trial Hearing was scheduled for July 22, 2008, and Jury Trial to begin July 23, 2008. Due to a family emergency, I was delayed in my travels to the pre-trial hearing. My granddaughter broke her arm two days prior to the pre-trial hearing at her home. She began experiencing pain and swelling

while in my care. I could not get in contact with her parents, thus obligating me to take her to the emergency room for an immediate procedure. I contacted the courts and explained to a clerk that I would be delayed. I was told that court was running behind schedule and that I would be okay, but she would give my message to Ms. Sherry Davis (presiding Judge Pickard's Assistant). In efforts to attend the pre-trial hearing—which is a 2 ½ hour drive from my home—I was contacted by Ms. Davis and informed that judgment had been decided and there was no need for me to take the 2 ½ hour drive. She apologized for not calling me sooner even though I had made several calls to the courts prior and left messages. I was not given my day in court and the ruling was unjust considering me having continuous medical care, debilitating pain, and a significantly diminished quality of life. I have since had to rely on prescribed wheelchairs and walkers for mobility. I am asking for the case to be resent to Jury Trial or to be granted a favorable judgment on amended punitive liability and compensatory damages.

STATEMENT OF THE CASE

This appeal proceeds from the Copiah County Circuit Court, Mississippi, and an Order granting Summary Judgment in favor of Defendants, Julie Tillman Watson and Tillman Furniture Company (5 locations) handed down one day before Jury Trial was to begin on July 23, 2008, by Honorable Lamar Pickard, presiding Circuit Judge. On July 22, 2008—the date for the Pre-Trial Hearing—I was informed by Judge Pickard's assistant, Sherry Davis, that the ruling was already granted in favor of the defendants. Ms. Davis' words were, "I'm sorry that I had not called you before you made the two-hour drive", which implied that the decision was already made with no prior notification to me, G. Simpson. She apologized for failing to contact me.

This case arose on December 20, 2004, when my mother, 9-months pregnant sister, and I visited the Tillman Furniture Store in Magee, Mississippi. While browsing through the store looking for furniture for my sister's new home, a salesperson suggested that my sister look in catalogs—right before we were about to sit down—until someone came to help us. My sister went with the salesperson while my mother and I waited. My mother sat in one chair and I sat in the chair that was unknowingly broken; the chair that my pregnant sister was about to sit in. When I sat in the already broken chair, it collapsed under me thrusting me onto the floor. In a Deposition Hearing, Carolyn Lagasse—the store manager and part owner—validated the condition of the chair, the fact that a customer had returned it to the store because of it breaking twice, knowledge of the damaged chair on the showroom floor in harm's way for 2-3 days, and no notification or identification posted that the chair was damaged. Witnesses at the deposition included Fedena Hall, the defendant's attorney, Whitney Gladden, and me. When I, the Appellant, asked Ms. Lagasse why wasn't the chair removed, she replied, "I don't know." She then apologized and said that that was her reason for having her employee take me to the Clinic & Hospital and authorized payment on the spot for any medical cost for x-rays, etc. (Please to Attachment A – receipt for payment made dated December 20, 2004) This action confirmed negligence and liability.

This incident was the beginning to the end of my qualities of life: physical, emotions, spiritual debilitating life such as it is by the Grace of God.

FACTS

On December 20, 2004, I visited the Tillman Furniture store, in Magee, Mississippi. I was accompanied by my sister and mother: Willie Bell Jenkins-Smith and Queen E. Jenkins respectively. While shopping, I sat in one of the dinner chairs and it collapsed. The staff rushed to my aide and

examined the chair I sat in. The chair was a previously damaged item that was not removed from the showroom floor. This fact was determined by one of the staff members—Ms. Carolyn Lagasse, Manager and part Owner. Ms. Lagasse admitted on December 20, 2004, and at a Deposition Hearing on June 10, 2007, that a customer had brought back the chair because it was broken and another chair from the same dinette set was also broken. I asked Ms. Lagasse at the Deposition Hearing:

1. Did you know the broken chair was on the showroom floor? Her answer was, “Yes.”
2. How long was the chair on the floor with other furniture? Her answer was, “2 or 3 days.”
3. If you knew the chair was broken, why didn’t you as the manager and part-owner move it or have it removed? Her answer was, “I don’t know” and she proceeded to say that she was sorry and she had tried to help me by taking me to the Clinic/Hospital. She stated that she paid Magee General \$832.75 and \$61.00 to the Clinic on December 20, 2004, on my behalf.

(See *Romain Wilson v. James C. Allday, ET AL.*, 487 So. 2d 793; 1986 Miss LEXIS 2433)

Please review the following documents as factual evidence of my argument.

Case Inf

IN THE CIRCUIT COURT OF COPIAH COUNTY

GWENDOLYN JENKINS SIMPSON

PTN = Prefecture
PLAINTIFF

V.

CAUSE NO. 2007-0474

JULIE TILLMAN WATSON
TILLMAN FURNITURE COMPANY

DEFENDANTS

1. Motion to Dismiss

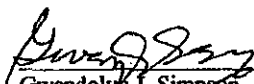
RESPONSE OF MOTION TO DISMISS JULIE TILLMAN WATSON

Comes now, Gwendolyn Jenkins Simpson, Plaintiff, in the above referenced matter and moves this Court not to dismiss Julie Tillman Watson from this action and states as follows:

1. That Julie Watson Tillman was named as a defendant in this matter
2. That no answer of Julie Tillman Watson dated January 14, 2008 has been received.
3. That Julie Tillman Watson is accountable for the lack of proper handling of her office as overseer and manager, as well as the safety and well being of me and others. The allegations verbally made to me regarding my civil and human rights opposing further medical treatments and my weight and/or size.
4. The fact that Julie Tillman Watson conferred with me November 2007 concerning this incident, the statements made, and no relief given is why she is included individually in this matter.

Wherefore, premises considered, for all the foregoing reasons, the Plaintiff requests the Court not to Dismiss Julie Tillman Watson from this action.

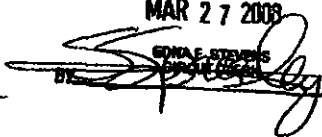
Respectfully submitted, this day of our Lord, the 23 day of March, 2008.


Gwendolyn J. Simpson
PLAINTIFF

FILED

MAR 27 2008

VOLUME 1 PAGE 9


D.C.

NEW

Diane E. Ross, M.D., P. A.
2160 East Pass Road, Suite D
Gulfport, MS 39507
228-896-3317

Gwendolyn Simpson

Date: 09/22/08

Follow up Visit

Last Seen: 06/24/08

Patient has been seen on multiple occasions since her initial referral at Garden Park Hospital, January of 2007. Patient has a history of a fall on December 20, 2004. She was sitting on a chair that collapsed out from under her and she fell to the floor. She fell back hitting her head on a table. Her buttocks hit the floor with the chair.

I first saw her for headaches and pseudotumor cerebri then continued to see her for complaint of neck and back pain that she complained of since her accident.

She had an MRI of the lumbosacral spine in 2007, which revealed L3-4 disc protrusion, L4-5 disc protrusion with displacement of L4 bilaterally. MRI of the thoracic spine in 2007 showed disc protrusion T4-5 causing mild flattening cord. MRI of the cervical spine in 2007 revealed C4-5 tiny disc protrusion, C5-6 central and left disc protrusion, extensive, with mild to moderate flattening of the cord especially to the left.

Patient continues to complain of low back pain down her right lower extremity to her toes and also down the left lower extremity to a lesser extent. She continued to complain of neck pain in the right upper extremity greater than the left upper extremity.

PHYSICAL EXAMINATION:

Vital Signs: Blood pressure is 150/104. Heart rate is 83. The patient is afebrile. The patient is well kempt.

Mental Status: The patient is awake, alert, oriented, judgment, fund of knowledge, and memory is intact.

Cranial Nerves: Extraocular movements are full. There is no nystagmus. Optokinetic nystagmus is normal. Fundoscopic exam shows the disc margins to be clear. Visual fields are intact to red object testing. Pupils are equal, round, and reactive to light and accommodation. Face, tongue, jaw movements, and sensation are normal. Rinne and Weber testing are normal. Hearing is intact to watch tick. Shoulder shrug is normal.

Motor: She uses a cane to walk. She stands with difficulty, slow gait. She walks sliding her feet and leaning on the cane with her right hand. She is unable to heel, toe, tandem walk. She is unable to do Romberg. Power, tone and coordination: Grade 4+ out of 5 strength in her upper extremities. Grade 3 out of 5 strength in her lower extremities. Deep tendon reflexes are +1 in the upper extremities and absent in the lower extremities. Straight leg raise is positive at 15 degrees bilaterally. She has muscle spasm in the cervical and lumbosacral areas.

Gwendolyn Simpson

Page 2

Follow-up Visit (Cont'd)

09/22/08

Sensory: Sensory exam is intact to pin, touch, temperature, vibration and position. There is no extinction to double simultaneous stimulation. Stereognosis and graphesthesia are intact.

Neck is supple. Carotids are +2 and there are no bruits. Evaluation of temporal arteries is intact

IMPRESSION: Fall injury from a chair in 2004 with subsequent chronic intractable neck and low back pain with radiculopathy with multiple disc protrusions (C4-5, C5-6, L3-4, L4-5, T4-5).

RECOMMENDATIONS: Patient needs neurosurgical re-evaluation and pain management.

This was dictated in the presence of the patient.

DER/dev

3 -
Patient Name: JOHNSON SIMPSON, GWEN J
Unit No: D0000816

Exams: 000223377 SPINE CERVICAL AP/LAT W/ODON,
000223378 SPINE LUMBAR AP & LATERAL/SPOT,
000223379 XR KNEE 1 OR 2 V LT

CLINICAL HISTORY: Patient fell from a chair

LUMBAR SPINE, THREE VIEWS, 22 DECEMBER 2004:

There are degenerative changes of the spine with hypertrophic spur formation and multiple levels and narrowing of the L4-5 disc with gas in the disc space and anterior and posterior endplate osteophyte formation at that level. L5 is apparently partially sacralized. No fracture or other acute abnormality of the spine identified.

CERVICAL SPINE, AP, LATERAL, SWIMMER'S AND OPEN MOUTH ODONTOID VIEWS:

No acute abnormality of the spine can be seen. Densities overlying some of the film apparently represent hair in pony tails and pony tail holders.

LEFT KNEE:

Advanced degenerative changes of the knee joint manifested by considerable narrowing of the medial joint compartment, hypertrophic spur formation of the opposing articular surface of the femur and tibia, subchondral sclerosis of the medial articular surfaces of the femur and tibia, some medial subluxation of the femur on the tibia, hypertrophic spur formation of the articular surfaces of the femur and patella at the femoral patellar joint, and there may also be some loose body calcification.

No other specific abnormality can be seen.

IMPRESSION:

ADVANCED OSTEOARTHRITIC CHANGES.
PLEASE SEE OTHER COMMENTS ABOVE

H. Barrett

Reported by: HOSHALL BARRETT M.D.

CC: Daniel T. Overbeck; Abul Rahman

Technologist: JOHN W ACKERMAN R.T. (R)
Transcribed Date/Time: 12/24/2004 (0633)
Transcriptionist: DHIM.JMM
Printed Date/Time: 12/24/2004 (0633) Batch No: N/A

PAGE 1 Report

Garden Park Medical Center
15200 Community RD
Gulfport, MS 39503

Phone #: 228-575-7000

Name: JOHNSON SIMPSON, GWEN J
Phys: OVEDA - Overbeck, Daniel T
DOB: 07/12/1953 Age: 51 Sex: F
Acct No: D000104655 Loc: D.ER
Exam Date: 12/22/2004 Status: DEP ER
Radiology No: 000307

Patient Name: JOHNSON SIMPSON, GWEN J
Unit No: D00008162

Exams: 000223376 CT HEAD/BRAIN WO CONTRAST

CLINICAL HISTORY: Status post fall. The patient states that she went to sit down in a chair and it broke. She fell hitting her back and head.

CT HEAD SCAN WITHOUT CONTRAST, 22 DECEMBER 2004:

The study was done with multiple axial images from base to vertex. Contrast material was not used.

The ventricles, basal cisterns and sulci all appear normal. No abnormal intracranial attenuation or evidence of intracranial mass can be seen. The visualized cranial bones are intact. Visualized paranasal sinuses and mastoid air cells are clear.

IMPRESSION:

NORMAL STUDY.

Reported by:  HOSHAIL BARRETT M.D.

CC: Daniel T Overbeck; Abul Rahman

Technologist: SHARON J WALLS R.T. (R)
Transcribed Date/Time: 12/22/2004 (0846)
Transcriptionist: DHIM.JMM
Printed Date/Time: 12/22/2004 (0846) Batch No: N/A

PAGE 1 Report

Garden Park Medical Center
15200 Community RD
Gulfport, MS 39503
Phone #: 228-575-7000

Name: JOHNSON SIMPSON, GWEN J
Phys: OVEDA - Overbeck, Daniel T
DOB: 07/12/1953 Age: 51 Sex: F
Acct No: D000104655 Loc: D.ER
Exam Date: 12/22/2004 Status: REG ER
Radiology No: 0003003

MEMORIAL HOSPITAL AT GULFPORT
RADIOLOGY REPORT

Fullman 5. ***

SIMPSON JOHNSON, GWENDOLYN DOB: 07/12/53 AGE: 53Y
MR# G000005083 CI# 108013 ACCOUNT # 071490029
SERV: OP
PT TYPE: OPR LOC: OPP EXAM DATE: 06/04/07
ORD: SMITH, TERRY MD ADM: SMITH, TERRY MD
ATT: SMITH, TERRY MD

Chk-in # Order Exam
108013 0001 60026 MR SPINE LUMBAR W/O CX (ROUTINE)
Ord Diag: BACK PAIN

MRI OF THE LUMBAR SPINE:

new CLINICAL INDICATION: Back pain, lumbar HNP and bilateral leg radiculopathy.

L1-2 disc: Mild annular disc bulge without discrete disc herniation or neural impingement.

L2-3 disc: Broad-based posterior disc protrusion without discrete disc herniation or neural impingement.

L3-4 disc: Left posterior disc herniation combining with moderate facet arthropathy to produce impingement of the left L4 nerve root.

new L4-5 disc: Right far lateral disc herniation producing impingement of the right L4 nerve root lateral to the pedicle. Mild facet arthropathy producing mild spinal stenosis.

L5-S1 disc: Within normal limits.

IMPRESSION:

L3-4 DISC HERNIATION, ASYMMETRIC TO THE LEFT PRODUCING MILD IMPINGEMENT OF THE LEFT L4 NERVE ROOT.

FAR LATERAL DISC HERNIATION ON THE RIGHT AT L4-5 PRODUCING DISPLACEMENT OF THE RIGHT L4 NERVE ROOT LATERAL TO THE PEDICLE.

DRS. BARRETT, JUSTICE, TIPTON, DIAZ, MASSONY, LOVELL, RAINES, COREY,
LAWSON, STOREY, RADIOLOGISTS
FINAL DUPLICATE

Page :1

RADIOLOGY REPORT

TRANSMISSION OK

 *** FAX TX REPORT ***

JOB NO. 3808
 DESTINATION ADDRESS 8630398
 PSWD/SUBADDRESS
 DESTINATION ID
 ST. TIME 12/05 11:06
 USAGE 7
 PGS. 1
 RESULT OK

DIANE E. ROSS, M.D.
 2160 E. Pass Road, Suite D
 Gulfport, MS 39507
 (228) 896-3317
 (228) 896-3314

863-0398

Attn: Cathy

and Rx lost is
 (228) 896-3317

DIANE E. ROSS, M.D.
 NEUROLOGY

748 Ogdon Avenue

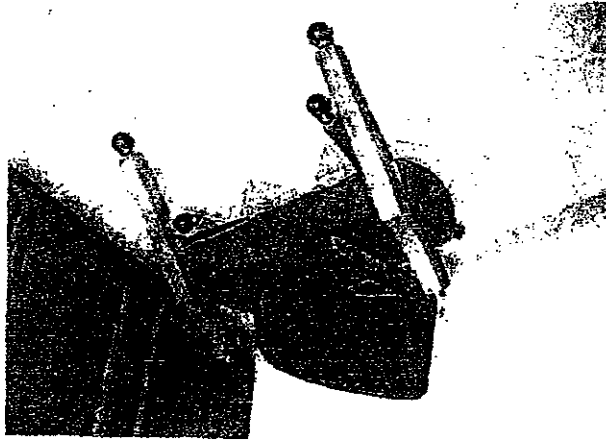
NAME Cathy Ross
 ADDRESS 1215 E

Rx Motorized w/c - 0
 + LS disc disease HWP by a
 previous; injury most sup
 shoulder; DDD Bilateral

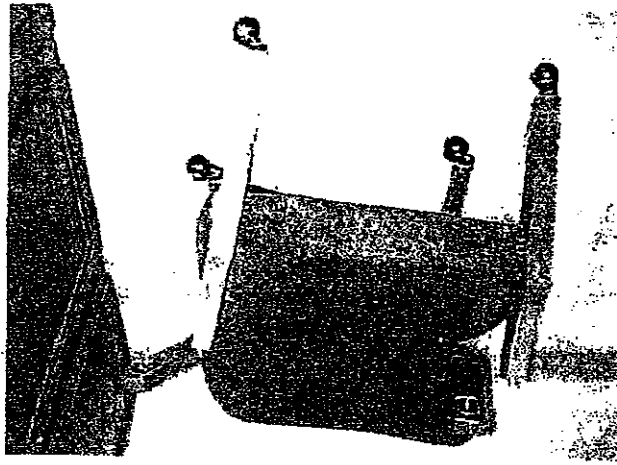
SECTION PERMITED M.D.
 THIS PRESCRIPTION WILL BE FILLED GENERALLY UNLESS
 LINE STATING "DISPENSE AS WRITTEN."
 AS NON. REF. ☐ REF. P.R.N. ☐ REP. ☐ PHONE ☐

INSURED: TILLMAN FURNITURE
POLICY #: CL443766
DOL: 12/20/04
CLMT: GWENDOLYN SIMPSON

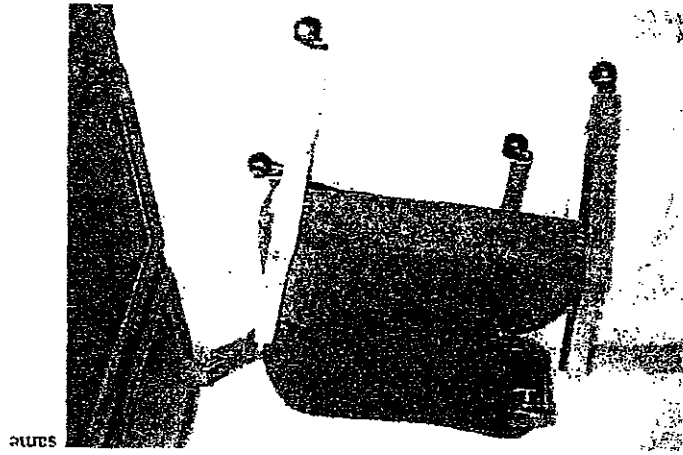
Broken Chair



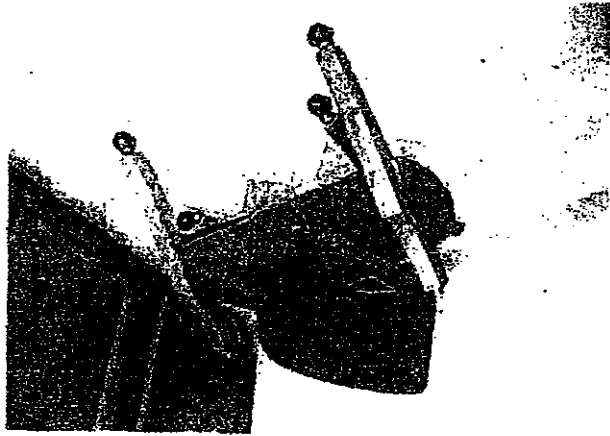
same



Doc 36, doc 4



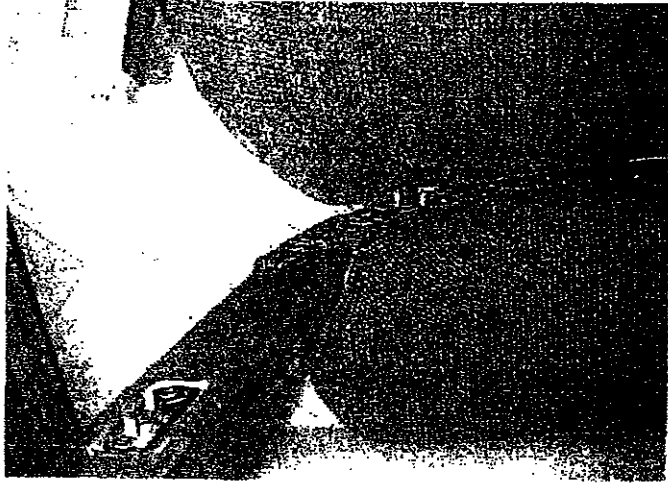
same



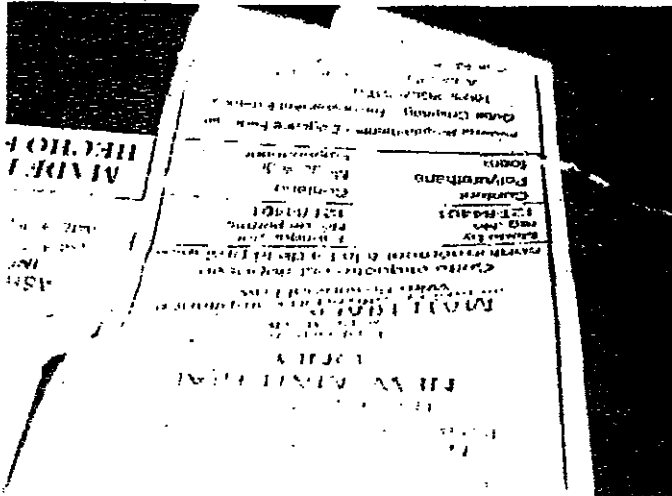
Broken Chair

INSURED: TILLMAN FURNITURE
POLICY #: GLA43766
DOL: 12/20/04
CLMT: GWENDOLYN SIMPSON

3.



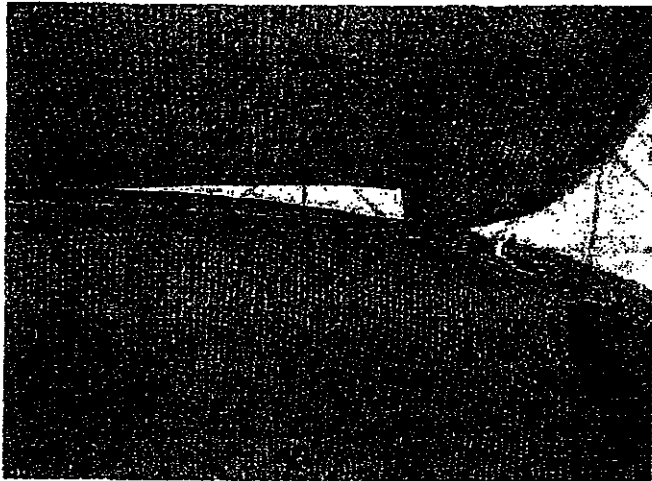
Back pulled away from seat.



Manufacturing Info

INSURED: TILLMAN FURNITURE
 POLICY #: GLA43766
 DOL: 12/20/04
 CLMT: GWENDOLYN SIMPSON

Screws that would
connect the seat and back
rest.



INSURED: TILLMAN FURNITURE
DOL: 12/20/04
POLICY #: GLA43766
CLMT: GWENDOLYN SIMPSON

HATTIESBURG CLINIC CONTINUATION RECORD

Then

12/20/2004
Bobby Jones, D.O.

Simpson, Gwendolyn

598313-5

*CS: Note: My home was burglarized
45 min away from where
incident happened in Magee; Ms.
I went to Dr. at home after not
feeling better 2 days.*

SUBJECTIVE: She is brought here by the manager of Tillman's Furniture. She sat on a chair and it collapsed under her. She fell backwards, also hitting her head on a wooden object. She complains of pain in the neck, shoulders and extending through the back, as well as, blurred vision and severe headache.

PAST MEDICAL HISTORY: Pseudotumor cerebri. She has had multiple spinal taps, claims that she has had a history of vision difficulty followed by ophthalmology, hypertension, CHF. She's also had a heart catheterization in the past.

MEDICATIONS: Plavix, K-Dur, Cozaar, Demadex and Nitroglycerin.

OBJECTIVE:

VITAL SIGNS:

HEENT:

MS:

BP: 138/80. WT: 323 lb. TEMP: Afebrile.

She has sharp optic discs and the eyes are reactive to light.

She has slight decreased range of motion in her C-spine. She will not attempt to turn her shoulders to any degree.

She has wincing and withdrawing from pain to palpation of the paraspinal and musculature in the C-spine all of the way through the lumbar. She will not allow me to straight leg raise, resisting by applying pressure downward. Reflexes were somewhat blunted in the lower extremity in the patella and Achille's bilaterally. The patient is tearful and seems to have somewhat of some psychological overlay.

ASSESSMENT/PLAN: Strained back and neck from a very short fall. Due to the headache and vision changes, the patient was also asking for a CT. We will have a CT performed. The results have now returned and shows no mass, hemorrhage or other significant abnormality and I've placed her on Motrin and Flexeril.

/Bobby Jones, D.O.
/km

BOBBY G. JONES, JR., D.O.
OFFICE: 601/867-3570
FAX: 601/867-3574



**MAGEE FAMILY
CLINIC**

A SERVICE OF HATTIESBURG CLINIC

801 MAIN AVENUE SOUTH • MAGEE, MS 39111
www.hattiesburgclinic.com

2

**MAGEE GENERAL HOSPITAL
MAGEE, MS 39111**

RADIOLOGY REPORT

NAME: SIMPSON, GWENDOLYN	DATE OF EXAM: 12/20/2004
XRAY#: 64771	SEX: F
DOB: 07/12/1953	TYPE: OUTPATIENT
MRN:	ACCT NO: 524038
ROOM: OP	

Physician: Jones, Bobby

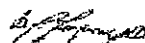
Unsigned transcriptions represent a preliminary report and do not reflect a medical or legal document

HEAD CT w/o CONTRAST: 12/20/2004

The ventricles are normal in size and midline. No abnormal masses or fluid collections are seen. No definite evidence of hemorrhage or infarction can be identified. The lower most posterior fossa is largely obscured by bony artifact. No acute bony changes can be identified about the skull.

Impression:

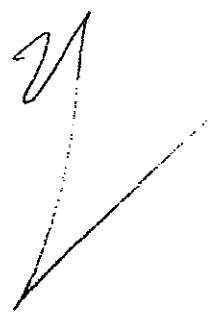
No mass, hemorrhage or other significant intracranial abnormality.



B. J. Ferguson, M.D.

DD: 12/20/2004/DT: 12/20/2004/cst

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If there are any questions or problems with this transmission of this facsimile, please call (601) 849-6070.



2

FORM 8-7800 (Rev. 12/1/80)

PATIENT COPY

4.

Page No. _____

4035.32
1650.00
2385.32 Bal due

Heating Oil
Ice Cream
Milk & Cream



MAGEE GENERAL HOSPITAL
DIAGNOSTIC IMAGING
C. T. REQUEST

PATIENT'S NAME: Wendy Simpson DOB: 7-12-1953

DISPOSITION OF PATIENT: ☐ GO HOME ☐ CALL REPORT(s) TO CLINIC
☐ RETURN TO CLINIC ☐ FAX REPORT(s) TO CLINIC
☐ SEND REPORT(s) / FILMS TO CLINIC WITH PATIENT
☐ REMAIN AT HOSPITAL FOR FURTHER INSTRUCTIONS

CLINICAL DIAGNOSIS: Head Trauma - Blunt
Vision - HA

**** REQUIRES MEDICAL NECESSITY**

[Signature]
PHYSICIAN'S SIGNATURE

HEAD AND NECK

371002	HEAD WITHOUT & WITH CONTRAST **	371000	HEAD WITHOUT CONTRAST **	371001	HEAD WITH CONTRAST **	371004	ORBIT WITH CONTRAST
371003	ORBIT WITHOUT CONTRAST	371005	ORBIT WITHOUT & WITH CONTRAST	371007	MAXILLOFACIAL WITH CONTRAST	371008	MAXILLOFACIAL WITHOUT & WITH CONTRAST
371006	MAXILLOFACIAL WITHOUT CONTRAST	371011	NECK SOFT TISSUE WITHOUT & WITH CONTRAST	371010	NECK SOFT TISSUE WITH CONTRAST	371009	NECK SOFT TISSUE WITHOUT CONTRAST
371015	CERVICAL SPINE WITHOUT CONTRAST	371016	CERVICAL SPINE WITH CONTRAST	371017	CERVICAL SPINE WITHOUT & WITH CONTRAST		
370154	SINUSES LIMITED	370281	SINUSES COMPLETE				

CHEST

371013	CHEST WITH CONTRAST	371014	CHEST WITHOUT & WITH CONTRAST	370012	CHEST WITHOUT CONTRAST	371019	THORACIC SPINE WITH CONTRAST
371018	THORACIC SPINE WITHOUT CONTRAST	371020	THORACIC SPINE WITHOUT & WITH CONTRAST				

ABDOMEN

370163	ABDOMEN & PELVIS WITHOUT & WITH CONTRAST	370181	ABDOMEN & PELVIS WITHOUT CONTRAST	370182	ABDOMEN & PELVIS WITH CONTRAST	371021	LUMBAR SPINE WITHOUT CONTRAST
371035	ABDOMEN WITHOUT & WITH CONTRAST	371033	ABDOMEN WITHOUT CONTRAST	371034	ABDOMEN WITH CONTRAST	371022	LUMBAR SPINE WITH CONTRAST
371026	PELVIS WITHOUT & WITH CONTRAST	371024	PELVIS WITHOUT CONTRAST	371025	PELVIS WITH CONTRAST	371023	LUMBAR SPINE WITHOUT & WITH CONTRAST

EXTREMITIES

370127	UPPER LEFT EXTREMITY W/O CONTRAST	371028	UPPER LEFT EXTREMITY WITH CONTRAST	371029	UPPER LEFT EXTREMITY W/O & WITH CONTRAST		
370258	UPPER RIGHT EXTREMITY W/O CONTRAST	370259	UPPER RIGHT EXTREMITY WITH CONTRAST	370257	UPPER RIGHT EXTREMITY W/O & WITH CONTRAST		
371030	LOWER LEFT EXTREMITY W/O CONTRAST	371031	LOWER LEFT EXTREMITY WITH CONTRAST	371032	LOWER LEFT EXTREMITY W/O & WITH CONTRAST		
370258	LOWER RIGHT EXTREMITY W/O CONTRAST	370255	LOWER RIGHT EXTREMITY WITH CONTRAST	370254	LOWER RIGHT EXTREMITY W/O & WITH CONTRAST		

MISC./ OTHER

PATIENT NAME: JOHNSON SIMPSON, GWEN J

DATE OF SERVICE: 12/22/04

EMERGENCY ROOM PHYSICIAN: Daniel T Overbeck

DICTATING PHYSICIAN: William Kergosien

EMERGENCY ROOM REPORT

HISTORY OF PRESENT ILLNESS: 51 year old female presents to the ER complaining of feeling sore in the cervical lumbar area and also the left knee. She fell down yesterday. She also has a history of pseudotumor cerebri. She did not actually strike her head and there was no loss of consciousness. She is concerned about her brain.

PAST MEDICAL HISTORY: NKDA.

PHYSICAL EXAMINATION:

VITAL SIGNS: Afebrile with vital signs stable.

GENERAL: Alert, obese. Does not appear ill or toxic.

HEENT: Head atraumatic. Pupils equal, round, and reactive to light. Conjunctiva pink and moist. Neck supple, non-tender.

ABDOMEN: Soft, non-tender.

EXTREMITIES: Slight tenderness to the left knee, however, obesity hinders a full exam.

NEUROLOGICAL: Unremarkable.

ER COURSE: CAT scan of the brain was pending when the patient decided she had to leave to attend an emergency with a family member. CAT scan was normal. *PT received a phone call*

DIAGNOSIS: MUSCULOSKELETAL STRAIN TO THE LUMBAR AND CERVICAL MUSCLES

KERNI / PFF

DD: 12/22/04

DT: 12/23/04

William Kergosien, M.D.

Electronically Signed by William Kergosien on 01/05/05 at 1432

GARDEN PARK MEDICAL CENTER
15200 Community Road
Gulfport, MS 39503

PATIENT NAME: JOHNSON SIMPSON, GWEN J
UNIT #: D000081624 ACCT#: D00010465557
ADM DATE: ROOM:
ATTENDING:

Run: 01/05/05-14:32 by KERGOSIEN, WILLIAM E

EMERGENCY ROOM REPORT - Autoprint copy

Page 1 of 1

7.
Patient Name: JOHNSON SIMPSON, GWEN J
Unit No: D000081624

Exams: 000223376 CT HEAD/BRAIN WO CONTRAST

CLINICAL HISTORY: Status post fall. The patient states that she went to sit down in a chair and it broke. She fell hitting her back and head.

CT HEAD SCAN WITHOUT CONTRAST, 22 DECEMBER 2004:

The study was done with multiple axial images from base to vertex. Contrast material was not used.

The ventricles, basal cisterns and sulci all appear normal. No abnormal intracranial attenuation or evidence of intracranial mass can be seen. The visualized cranial bones are intact. Visualized paranasal sinuses and mastoid air cells are clear.

IMPRESSION:

NORMAL STUDY.

NO ESSENTIAL CHANGE SINCE NONCONTRASTED CT HEAD SCAN OF 11/5/04.

H. Barrett
Reported by: HOSHALL BARRETT M.D.

CC: Daniel T Overbeck; Abul Rahman

Technologist: SHARON J WALLS R.T. (R)
Transcribed Date/Time: 12/22/2004 (0846)
Transcriptionist: DHIM.JMM
Printed Date/Time: 12/22/2004 (0846) Batch No: N/A

PAGE 1 Report

Garden Park Medical Center
15200 Community RD
Gulfport, MS 39503

Phone #: 228-575-7000

Name: JOHNSON SIMPSON, GWEN J
Phys: OVEDA - Overbeck, Daniel T
DOB: 07/12/1953 Age: 51 Sex: F
Acct No: D00010465557 Loc: D.ER
Exam Date: 12/22/2004 Status: REG ER
Radiology No: 00030038

Patient Name: JOHNSON SIMPSON, GWEN J
Unit No: D000081624

Exams: 000223377 SPINE CERVICAL AP/LAT W/ODON,
000223378 SPINE LUMBAR AP & LATERAL/SPOT,
000223379 XR KNEE 1 OR 2 V LT

CLINICAL HISTORY: Patient fell from a chair

LUMBAR SPINE, THREE VIEWS, 22 DECEMBER 2004:

There are degenerative changes of the spine with hypertrophic spur formation and multiple levels and narrowing of the L4-5 disc with gas in the disc space and anterior and posterior endplate osteophyte formation at that level. L5 is apparently partially sacralized. No fracture or other acute abnormality of the spine identified.

CERVICAL SPINE, AP, LATERAL, SWIMMER'S AND OPEN MOUTH ODONTOID VIEWS:

No acute abnormality of the spine can be seen. Densities overlying some of the film apparently represent hair in pony tails and pony tail holders.

LEFT KNEE:

Advanced degenerative changes of the knee joint manifested by considerable narrowing of the medial joint compartment, hypertrophic spur formation of the opposing articular surface of the femur and tibia, subchondral sclerosis of the medial articular surfaces of the femur and tibia, some medial subluxation of the femur on the tibia, hypertrophic spur formation of the articular surfaces of the femur and patella at the femoral patellar joint, and there may also be some loose body calcification.

No other specific abnormality can be seen.

IMPRESSION:

ADVANCED OSTEOARTHRITIC CHANGES.
PLEASE SEE OTHER COMMENTS ABOVE.

H. Barrett

Reported by: HOSHALL BARRETT M.D.

CC: Daniel T Overbeck; Abul Rahman

Technologist: JOHN W ACKERMAN R.T. (R)
Transcribed Date/Time: 12/24/2004 (0633)
Transcriptionist: DHIM.JMM
Printed Date/Time: 12/24/2004 (0633) Batch No: N/A

PAGE 1 Report

Garden Park Medical Center
15200 Community RD
Gulfport, MS 39503

Phone #: 228-575-7000

Name: JOHNSON SIMPSON, GWEN J
Phys: OVEDA - Overbeck, Daniel T
DOB: 07/12/1953 Age: 51 Sex: F
Acct No: D00010465557 Loc: D.ER
Exam Date: 12/22/2004 Status: DEP ER
Radiology No: 00030038

Jun 07 07:04:08p

Radiology Business Office

2288674137

p.1

MEMORIAL HOSPITAL AT GULFPORT
RADIOLOGY REPORT

SIMPSON JOHNSON, GWENDOLYN DOB: 07/12/53 AGE: 53Y
MR# G000005083 CI# 108013 ACCOUNT # 071490029
SERV: OP
PT TYPE: OPR LOC: OPP EXAM DATE: 06/04/07
ORD: SMITH, TERRY MD ADM: SMITH, TERRY MD
ATT: SMITH, TERRY MD

Chk-in # Order Exam
108013: 0001 60026 MR SPINE LUMBAR W/O CX (ROUTINE)
Ord Diag: BACK PAIN

MRI OF THE LUMBAR SPINE:

CLINICAL INDICATION: Back pain, lumbar HNP and bilateral leg radiculopathy.

L1-2 disc: Mild annular disc bulge without discrete disc herniation or neural impingement.

L2-3 disc: Broad-based posterior disc protrusion without discrete disc herniation or neural impingement.

L3-4 disc: Left posterior disc herniation combining with moderate facet arthropathy to produce impingement of the left L4 nerve root.

L4-5 disc: Right far lateral disc herniation producing impingement of the right L4 nerve root lateral to the pedicle. Mild facet arthropathy producing mild spinal stenosis.

L5-S1 disc: Within normal limits.

IMPRESSION:

L3-4 DISC HERNIATION, ASYMMETRIC TO THE LEFT PRODUCING MILD IMPINGEMENT OF THE LEFT L4 NERVE ROOT.

FAR LATERAL DISC HERNIATION ON THE RIGHT AT L4-5 PRODUCING DISPLACEMENT OF THE RIGHT L4 NERVE ROOT LATERAL TO THE PEDICLE.

DRS. BARRETT, JUSTICE, TIPTON, DIAZ, MASSONY, LOVELL, RAINES, COREY,
LAWSON, STOREY, RADIOLOGISTS
FINAL DUPLICATE

Page :1

RADIOLOGY REPORT

10

MEMORIAL HOSPITAL AT GULFPORT
RADIOLOGY REPORT

SIMPSON JOHNSON, GWENDOLYN DOB: 07/12/53 AGE: 53Y
MR# G000005083 CI# 108013 ACCOUNT # 071490029
SERV: OP
PT TYPE: OPR LOC: OPP EXAM DATE: 06/04/07
ORD: SMITH, TERRY MD ADM: SMITH, TERRY MD
ATT: SMITH, TERRY MD

Checkin-Exam Code Summary
1080136-6002

LOWER THORACIC AND UPPER LUMBAR DEGENERATIVE DISC DISEASE WITHOUT
DEFINITE NEURAL IMPINGEMENT.

Read By- RAYMOND E TIPTON , M.D.
Released By- RAYMOND E TIPTON , M.D.
Released Date Time- 06/04/07 1825
Typed By- PRJ

PRELIMINARY UNLESS RELEASED

DRS. BARRETT, JUSTICE, TIPTON, DIAZ, MASSONY, LOVELL, RAINES, COREY,
LAWSON, STOREY, RADIOLOGISTS
FINAL DUPLICATE

Page :2

RADIOLOGY REPORT

Patient Name: JOHNSON SIMPSON, GWEN J
Unit No: D0000816

Exams: 000223377 SPINE CERVICAL AP/LAT W/ODON,
000223378 SPINE LUMBAR AP & LATERAL/SPOT,
000223379 XR KNEE 1 OR 2 V LT

CLINICAL HISTORY: Patient fell from a chair

LUMBAR SPINE, THREE VIEWS, 22 DECEMBER 2004:

There are degenerative changes of the spine with hypertrophic spur formation and multiple levels and narrowing of the L4-5 disc with gas in the disc space and anterior and posterior endplate osteophyte formation at that level. L5 is apparently partially sacralized. No fracture or other acute abnormality of the spine identified.

CERVICAL SPINE, AP, LATERAL, SWIMMER'S AND OPEN MOUTH ODONTOID VIEWS:

No acute abnormality of the spine can be seen. Densities overlying some of the film apparently represent hair in pony tails and pony tail holders.

LEFT KNEE:

Advanced degenerative changes of the knee joint manifested by considerable narrowing of the medial joint compartment, hypertrophic spur formation of the opposing articular surface of the femur and tibia, subchondral sclerosis of the medial articular surfaces of the femur and tibia, some medial subluxation of the femur on the tibia, hypertrophic spur formation of the articular surfaces of the femur and patella at the femoral patellar joint, and there may also be some loose body calcification.

No other specific abnormality can be seen.

IMPRESSION:

ADVANCED OSTEOARTHRITIC CHANGES.
PLEASE SEE OTHER COMMENTS ABOVE

H. Barrett

Reported by: HOSHALL BARRETT M.D.

CC: Daniel T. Overbeck; Abul Rahman

Technologist: JOHN W ACKERMAN R.T. (R)
Transcribed Date/Time: 12/24/2004 (0633)
Transcriptionist: DHIM.JMM
Printed Date/Time: 12/24/2004 (0633) Batch No: N/A

PAGE 1 Report

Garden Park Medical Center
15200 Community RD
Gulfport, MS 39503

Phone #: 228-575-7000

Name: JOHNSON SIMPSON, GWEN J
Phys: OVEDA - Overbeck, Daniel T
DOB: 07/12/1953 Age: 51 Sex: F
Acct No: D000104655 Loc: D.ER
Exam Date: 12/22/2004 Status: DEP ER
Radiology No: 00030

Patient Name: JOHNSON SIMPSON, GWEN J
Unit No: D00008162

Exams: 000223376 CT HEAD/BRAIN WO CONTRAST

CLINICAL HISTORY: Status post fall. The patient states that she went to sit down in a chair and it broke. She fell hitting her back and head.

CT HEAD SCAN WITHOUT CONTRAST, 22 DECEMBER 2004:

The study was done with multiple axial images from base to vertex. Contrast material was not used.

The ventricles, basal cisterns and sulci all appear normal. No abnormal intracranial attenuation or evidence of intracranial mass can be seen. The visualized cranial bones are intact. Visualized paranasal sinuses and mastoid air cells are clear.

IMPRESSION:

NORMAL STUDY.



Reported by: MARSHALL BARRETT M.D.

CC: Daniel T Overbeck; Abul Rahman

Technologist: SHARON J WALLS R.T. (R)

Transcribed Date/Time: 12/22/2004 (0846)

Transcriptionist: DHIM.JMM

Printed Date/Time: 12/22/2004 (0846) Batch No: N/A

PAGE 1

Report

Garden Park Medical Center
15200 Community RD
Gulfport, MS 39503

Phone #: 228-575-7000

Name: JOHNSON SIMPSON, GWEN J
Phys: OVEDA - Overbeck, Daniel T
DOB: 07/12/1953 Age: 51 Sex: F
Acct No: D000104655 Loc: D.ER
Exam Date: 12/22/2004 Status: REG ER
Radiology No: 0003003

SUMMARY OF THE ARGUMENT

Tillman Furniture Company; Julie Tillman Watson and Carolyn Lagasse (Owners), failed to secure a reasonable safe environment for me and other customers while shopping or visiting their business. Acknowledgment by Ms. Carolyn Lagasse at the Deposition on June 10, 2008, that a customer returned the damaged chair and the chair knowingly remained on the showroom floor for 2 – 3 days without any notification or identification of its condition, proves their negligence and liability for my present state and physical, emotional, and spiritual devastation. [Supreme Court of Miss. *Romain Wilson v. James C. Allday, ET AL.*, 487 So. 2d 793; 1986 Miss LEXIS 2433]; [HN1 – HN2]; [HN3-7].

Though I was “out-lawyered”, the defendants are still and should be responsible. At 56 years of age, I am one of millions of human beings who have physical issues that life and living will naturally bring to the human body. Nevertheless any past medical records or condition, when that broken chair slammed me to the floor causing new and aggravating physical and emotional pain and suffering robbing me of independence of quality of life. My physician, Dr. Ross, has had to prescribe a walker and electric wheelchair to assist me with mobility and personal needs.

On December 20, 2004, I walked into Tillman Furniture Company with my mother and sister and with no physical assistance only to find that moments later I had to be helped up from the floor and helped out. Hence began my heart breaking **Fight for Justice**. As I stated earlier, I am not a lawyer; this is why I rely on the Bible verse from Philippians 4:13, which states, “I can do all things through Christ who strengthens me.”



PRAYER OF RELIEF

My prayer of relief is for justice: Reverse Summary Judgment or Resent for Jury Trial. I am praying that out of this I am compensated for physical and emotional pain and suffering and ministry loss due to negligence and wreck less endangerment on the part of Tillman Furniture Company, Julie Tillman Watson, and Carolyn Lagasse (Co-Owners). Please consider the following amended compensation requested:

1. Punitive Damages - \$150,000.00
2. Liability - \$350,000.00
3. Compensatory Damages - \$450,000.00
4. Julie Tillman Watson - \$34,000.00

Please refer to Addendum A, B, C, and D, which is the original Complaint for Damages and ministry music CD enclosed. Please examine documents and listen to CD. This is just a view of my life and worth in ministry since 1987. No sum of money can replace my loss, pain and suffering, and self-worth; however, one consolation and my conclusion in this outcome is Hebrews 11:1 which states, "Now faith is the substance of things hoped for and the evidence of things not seen." This is my prayer of relief.

PRAYER OF RELIEF: ADDENDUM A

IN THE CIRCUIT COURT OF COPIAH COUNTY

GWENDOLYN JENKINS SIMPSON

PLAINTIFF

V.

CAUSE NO. 2007-0474

JULIE TILLMAN WATSON
TILLMAN FURNITURE COMPANY

DEFENDANTS

PLAINTIFF GWENDOLYN JENKINS SIMPSON REQUEST:

1. MOTION TO AMEND 1ST COMPLAINT FOR DAMAGES 2. RESPONSE TO
DEFENDANTS MOTION OF SUMMARY JUDGEMENT 3. RESPONSE TO
DEFENDANTS OPPOSITION OF THE 1ST AMENDMENT COMPLAINT 4. DR.
CETHUS SIMMONS MD. EXPERT EVALUTION: WITNESS 5. COPY OF CHECK

Comes now, Gwendolyn Jenkins Simpson, Plaintiff, in the above referenced matter as consideration:

*Amended:
Jan 8, 2009*

\$150,000.00

1. Punitive damages from ~~\$354,106.25 to \$1.2 million~~ ^{GS.} dollars. Reason: Debt to Medicaid insurance paid could exceed punitive damages as well as lost of my benefits for at least 4 years. As defendant's attorney pointed out at deposition, that in the event of any money being offered, Medicaid will have their hand out first; so upon that comment I contacted Medicaid and it was confirmed.

IA. Lost donation information will be presented on or before July 22, 2008.

*Domestic
\$350,000.00*

2. Liability ~~\$1.2 million~~ ^{GS.}. Reason: was included because under oath on June 10, 2008 store manager Carolyn Lagarsee stated that she was aware of the broken chair was openly on the showroom floor 2 to 3 days with out ~~signage~~ ^{signage} or indication that the chair was broken or damaged to customers; therefore, admitting negligence and guilt. *Witness by: Felena Hall; See: Janiffa Corder*
Depo June 10, 2008

\$450,000.00

3. Compensatory damages from ~~\$204,106.25 to \$2.2 million~~ ^{GS.}. Reason: for neglecting to take actions in preventing this life altering event from taking place. Which the store, company, manager, and owner should be held liable for negligence and reckless endangerment.

4. Julie Tillman Watson from \$54,106.25 to \$34,106.25

Open

5. Mediation failed after 2 hours of a game of cat and mouse and being informed that Medicaid had already began sending in judgment letters in the event of any settlement, still being offered just ~~\$450,000~~ ^{GS.}. This is the main reason that I am asking the courts to allow the Amended Complaint to stand. I am humbly requesting a minimum of \$1.2 million be allowed to be included into the original amended complaint under liability, recklessness, and endangerment, as admitted on June 10, 2008 during deposition testimony by store manager. I respectfully ask that not all be stricken, but that it is presented so that the jury ~~and the~~

GS. Made a matter of record.
1/4/106.25

PRAYER OF RELIEF: ADDENDUM B

Example:
 Refer to Defendant's Response
 to Plaintiff's Complaint Refer to #3 +
 Exhibit in Deposition
 Cause: 2007-0474
 doct Donato

Check Stub
 2824 6/24/2007 500.00

NOTE: See offering
 3X weekly 500.00
 CD Sale 15.00 each
 1 month = 1 month =

B B. T. Checking Love/Seed Offering 500.00

1 Day Service on 24th. Here then had more
 Note: Don't include CD or other
 need personal offering

Note: I had to be lead around to
 keep from falling most of this time
 I was given a chair to sit in
 preventing from the pain embarrassment
 of my movement (lack) of it.

PRAYER OF RELIEF: ADDENDUM C

~~~~~Welcome~~~~~

\*Divorce \*Single \*Married

\*Mental Problems \* Children Problems \* Witchcraft \* Drugs

\*Broken Homes \* Demonic Oppression

For More Information: P.O. Box 2214 Gulfport, Ms. 39505

Overseer/ Evangelist/ Prophetess

Gwendolyn Simpson.....(228) 383-6400

My Shepherd: Pastor Charles & Janice Taylor

6226 Mississippi Ave. Gulfport, Ms. 39501

(228) 864-8856

Special Note: All races, ages, rich, poor,  
all denominations, wear what you have.

New Releases of Cd  
~Music Phetic Volumn I Enter In  
are now available upon request.

\_\_\_\_\_ Book to be released

A time of Healing, Deliverance, Salvation and Hope.  
Come just as you are and the Holy Ghost will change your life.

Date \_\_\_\_\_

Time \_\_\_\_\_

Place \_\_\_\_\_

Host Pastor \_\_\_\_\_

& Church \_\_\_\_\_

Information \_\_\_\_\_

*No Demons "Just Straightway" Greetings Customized By:*

*No Demons* Sis Janice C. Williamson 7400 Gorenflo Rd. # B-116 Biloxi, Ms. 39532 (228) 392-7722

New Creation Prophetic

Outreach Ministries Revival Crusade

II Corinthians 5:17

"Therefore if any man (woman) be in Christ Jesus, he is a new creature:  
Old things are passed away; behold all things are become new."



*There is therefore now no condemnation to them which are in Christ Jesus, who walk not after the flesh but after the spirit. Romans 8:1*

Thus, about 19 years ago, on November 7, 1987, my life as turned upside right! I was married eleven years to a military man I desperately loved; military life gave me and our son and daughter financial security and stability, such as it was. But, not to my surprise, yet suddenly, our marriage was over. By choice of my husband, and in spite of my begging and resisting it, he divorced me. As painful and devastating as it was—yes even for a Christian—deliverance had come, for weeping endure for a night (years) but joy will come in the morning. And it did! "For...therefore if any man (woman) be in Christ, he is a new creature. Old things are passed away; behold all things are become new." Yes! As a Christian in the midst of brokenheartedness, spirits of suicide, murder, bitterness, unforgiveness, anger, shame, condemnation, pity, depression, fear and hate were pressing to come in my heart. (Yes, walking with the Lord for quite a few years, Holy Ghost filled believers) these sins were trying to invade the temple of the Living God. But God spoke life. The God that spoke into darkness and emptiness and created the universe, the God of all creation spoke to me (my broken dark and empty life) and I became a **NEW CREATION**.

Thus...this "Ministry of New Creation Women Outreach" is created by God, not I. God has anointed and appointed me to seek out the many maimed, hurting and lost women who have been spiritually and naturally raped, and molested. To declare and decree, His love and forgiveness, their value to Him. Yes, to declare God can use all mess and make you His best! For He came that you might have life and that more abundantly.

You can be fulfilled in Christ Jesus.  
Humbly Yours,  
Evangelist/Prophetess Gwendolyn S. Simpson

#### APPEAL TO PASTORS AND THOSE IN LEADERSHIP POSITIONS:

I encourage you after reading this brochure not to lean to your own understanding: Your doctrine, traditions, mistrust, self righteousness, and even the fact that I am a woman. Nevertheless, the conditions that I mentioned in this brochure are real in our churches and communities today. It is time for a spiritual warfare. Please acknowledge the Lord in all of your ways. We are accountable to "God" for every soul he has entrusted to us...He wants them whole...am I a hand of the body of Christ reaching out to help strengthen the body...come (call or write) -let us reason together. I am a gift of the body of Christ!!!

A Helping Hand  
Gwendolyn S. Simpson

#### New Creation

#### Women Outreach Ministries

#### Biblical Principles

#### Focus:

- Women, young adults, and children:
  - incest, rape; mental, physical and sexual abuse
- Displaced women and children:
  - pastor's wives, lay members, widows, divorcees, singles, etc.
  - interracial marriages
  - unnatural sexual disorders, gay
  - poverty/demonic depressed
  - uneducated - prison ministry
  - separated/abandoned
  - "The Brady Bunch" Stepmother, mother, sister, brother)
  - unwed mothers
  - childless women
  - handicapped women
  - drug abuse, food abuse
  - Christian dating, re-marriage
  - Terminally ill, cancer, AIDS, etc.
  - low self esteem
  - unprepared homemakers: cooking, cleaning, budgeting, raising children
  - educated, but unfulfilled

#### Ministering Available:

- Displaced women and children:
- Confidential prayer and counseling
- Prayer and healing revival/seminar
- Marriage and re-marriage, singles workshop
- Seminar: How to organize a Spirit-led women outreach ministry for: church, home, community, business, etc.
- Spirit-led fashion and beauty consultant
- New creation worship and praise workshop and seminar
- Seminar: prayer and intercession
- Radio Ministry
- 911 New Life Prayer Clinic NO PAY.

\*

### CONCLUSION

In conclusion, it has been God's grace and much prayers and help from family and church that I have "fainted not". Because of the stress and unfair tactics of how my case has been handled, including being denied **ISP** from the Circuit Court Judge Pickard when my monthly income totals less than \$1,000.00, I respectfully seek justice once and for all.

This day of our Lord the 15 day of January, 2009.

Respectfully Submitted,  
GWENDOLYN JENKINS SIMPSON

BY:

Gwendolyn Jenkins Simpson  
Gwendolyn Jenkins Simpson, APPELLANT  
Philippians 4:13  
"I can do all things through Christ who strengthens me."

**MISSISSIPPI OFFICE OF APPEALS**  
**Betty W. Sephton (Clerk)**  
**Post Office Box 249**  
**Jackson, Mississippi 39205-0249**  
**Telephone: 601-359-3694**

## CERTIFICATE OF SERVICE

I, Gwendolyn Jenkins Simpson, do hereby certify that I have this day caused to be mailed via United States Postal Service, First Class postage prepaid, a true and correct copy of the above and foregoing **BRIEF OF SUMMARY JUDGMENT APPEAL** to be resent for Jury Trial or Award Amended Compensation for liability to the following:

Honorable Lamar Pickard  
C/O Edna E. Stevens (Clerk)  
Circuit Court of Copiah County  
Post Office Box 467  
Hazlehurst, MS 39083

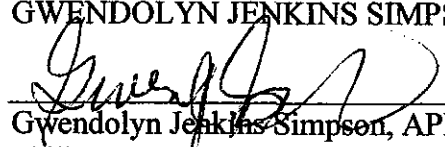
Ms. Whitney Gladden  
Defendant Attorney  
Post Office Box 13429  
Jackson, MS 39223-3429

Gwendolyn Jenkins Simpson  
5041/28<sup>th</sup> Street #1613  
Gulfport, MS 39501  
Telephone: 228-383-6400

This day of our Lord the 15 day of January, 2009.

Respectfully Submitted,  
GWENDOLYN JENKINS SIMPSON

BY:

  
Gwendolyn Jenkins Simpson, APPELLANT  
Philippians 4:13

**MISSISSIPPI OFFICE OF APPEALS**  
Betty W. Sephton (Clerk)  
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