



STATE BOARD OF WORKERS' COMPENSATION
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STATEMENT OF THE CASE

The employee worked for the employer as a packaging helper. On or around March 17, 2023, the employee asserts he developed gradual on-set back pain while working for the employer.

Counsel for the employee filed Form WC-14 with the Board requesting a hearing to determine the employee's entitlement to workers' compensation benefits. Specifically, counsel for the employee requests: (1) this claim to be found compensable; (2) TTD benefits from March 17, 2023, and continuing; (3) payment of medical expenses; (4) medical treatment for the employee's work-related back injury; and (5) 15% late-payment penalties and assessed attorney fees. (T. 4-5, C-11).

In response, counsel for the employer/insurer asserts the employee's back injury did not arise out of and in the course of his employment with the employer. (T. 5-6).

The parties agreed if I find this claim compensable, the parties will work out the payment/reimbursement of any medical expenses associated with the employee's work-related injuries, subject to the fee schedule. (T. 4-5, C-10).

A hearing was held on July 9, 2024, in Gainesville, Georgia.

At the hearing, the parties stipulated to jurisdiction, the employer being subject to the Act, county of injury—Hall, venue—Hall County, notice, coverage, and employment. (T. 6-8). The parties did not stipulate to accident, injury or average weekly wage. (T. 5-9).

The record consists of claimant's exhibits C-1 through C-14 and D-1 through D-10. (T. 10, 83). The record closed at the hearing. The transcript was filed on August 6, 2024, with the Board.

By August 20, 2024, both attorneys filed a well-written brief in support of their respective positions.

After a review of the record as a whole, including careful consideration of the credibility of the witnesses and the documents admitted into evidence, I find the preponderance of competent and credible evidence reveals as follows:

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. In November of 2022, the employee sought work through a temporary staffing agency. (T. 54, C-14). The staffing agency placed the employee at the employer. The employer is a food manufacturer. (T. 13). The employee performed the job of packaging helper. (T. 12-16, C-1). The employee worked lifting bakery products onto trays, removing products from conveyor belts and onto pallets or rollers, moving pallets and boxes, sweeping, and cleaning machines. (T. 12-15). The employee worked twelve-hour shifts, along with some overtime hours. (Id., C-2).
2. Eventually, the employee was hired on by the employer as a permanent employee performing the employee's same job—packaging helper.
3. On March 11, 2023, the employee reported to work. The employee was working the 7:00 p.m. to 7:00 a.m. shift. After approximately five hours into his shift, the employee developed back pain radiating down his left side. (T. 27-31, 77). The employee had to stop working and went to the emergency room.
4. At the emergency room, the employee reported left lower extremity pain for three weeks. (C-5, pp. 1-4, D-1). It was noted the employee worked standing on his feet all day. The employee was diagnosed with lower limb pain and prescribed pain medication.
5. The employee attempted to work through his back pain. (T. 31). However, when back pain persisted, the employee sought medical treatment at the emergency room on March 17, 2023. (T. 32-34, D-10, p. 30).
6. At the hospital, the employee reported his back pain. (C-5, pp. 9-10, D-1). An MRI was recommended which revealed herniations at L3-4 and L4-5. Id. The MRI also raised a concern for cancer. As such, a full body scan was performed which subsequently revealed the employee

thankfully did not have cancer.

7. Since the employee was in need of further medical care and as such, going to miss time from work, he reached out to the employer about using leave and providing the employer with the proper documentation. (T. 34-35, 39-41, C-4, D-10, p. 31).
8. On March 24, 2024, the employee was evaluated by Dr. Zain Boghani. (C-5, pp. 12-13, D-3). After evaluating the employee, including reviewing the employee's recent MRI, Dr. Boghani indicated the employee had a ruptured disc at L4-5 with compression of the L5 nerve root and radiculopathy. Dr. Boghani recommended an L4-5 microdiscectomy.
9. The employee underwent back surgery on May 24, 2023, with Dr. Boghani. (T. 40-41, C-5, p. 23, D-5). The employer placed the employee on FMLA. (T. 41-42, C-7, D-10, p. 31).
10. Since the employee's surgery, Dr. Boghani and Dr. Dopson indicate the employee may return to work without restrictions. (T. 43, 75, D-7, D-8). However, despite the full duty work releases, the employer has not allowed the employee to return to work. (T. 43-47, 50-51, C-9).
11. The first issue to address is the employee's average weekly wage. Counsel for the employee argues the employee's average weekly wage is \$847.43, yielding a TTD rate of \$564.95 per week. Even though the employee did not work with the employer for thirteen weeks prior to his accident, counsel for the employee argues the employee was performing the same work over thirteen weeks prior to his injury, and as such, his wages with the temporary service and the employer should be used to calculate the employee's average weekly wage. In response, counsel for the employer/insurer argues the employee's average weekly wage should be \$603.73 per week, yielding a TTD rate of \$402.49 per week. (T. 7-8).
12. When an employee suffers a work-related injury, an average weekly wage for the employee must be established to determine the employee's entitlement to income benefits. See O.C.G.A. §34-9-260.
13. To calculate an average weekly wage, O.C.G.A. §34-9-260 requires us to look at: (1) substantially the whole of 13 weeks immediately preceding the employee's accident/injury; (2) the wages of a similar situated employee who worked substantially the whole of 13 weeks preceding the employee's accident/injury; and (3) the full-time weekly wage of the

employee.

14. Under O.C.G.A. §34-9-260, when determining an employee's average weekly wage, the Board is required to consider the evidence in the record with respect to each statutory section in numerical order. See Rheem Manufacturing Company v. Jackson, 254 Ga. App. 454, 562 S.E.2d 524 (2002); Cho Carwash Property, LLC v. Everett, 326 Ga. App. 6, 755 S.E.2d 823 (2014); Thomas v. Fulton County Board of Education, 331 Ga. App. 828, 771 S.E.2d. 482 (2015).
15. In this claim, I find the employee worked substantially the whole of thirteen weeks prior to his injury. (T. 7-8, C-2, C-3, D-9). I find the employee worked in the same job, but for a period of time with a staffing agency and then, the employer. I find O.C.G.A. §34-9-260(1) allows for the calculation of an average weekly wage under these circumstances because this code section allows for consideration of work, "whether for the same or another employer..." O.C.G.A. §34-9-260(1).
16. In this claim, I find the employee's average weekly wage is \$847.43, yielding a TTD rate of \$564.95 per week. (T. 7-8, C-2, C-3, D-9).
17. Counsel for the employee argues the employee suffered a gradual on-set back injury while working for the employer. A new accident may result from a gradual worsening of a pre-existing injury due to the performance of work duties. Trucks, Inc. v. Trowell, 302 Ga. App. 488, 690 S.E.2d 880 (2010). The date of the new accident is usually the date of disability (or the first day the employee ceases working).
18. Since this is an all issues claim, the claimant has the burden of proof to show that his injuries arose out of and in the course of his employment with his employer. See Holt Service Company v. Modlin, 163 Ga. App. 283, 293 S.E.2d 741 (1982); Zamora v. Coffee General Hospital, 162 Ga. App. 82, 290 S.E.2d 192 (1982); Dasher v. City of Valdosta, 217 Ga. App. 351, 457 S.E.2d 259 (1995). Essentially, the claimant must prove a causal connection between the employee's work and his resulting injuries to show a claim is compensable (i.e., entitlement to workers' compensation benefits). See O.C.G.A. §34-9-1(4). In an "all issues" claim, the burden of proof is on the claimant to show by a preponderance of competent and credible evidence all of the essential elements of his case. Jones v. Fieldcrest Mills, Inc., 162 Ga. App. 848, 292 S.E.2d 523 (1982). The standard of proof to meet this burden is by a preponderance of competent and credible evidence. See Maloney v. Gordon County Farms, 265 Ga. 825, 462 S.E.2d 606 (1995).

19. “Injury” under the Workers’ Compensation Act means only injury by accident arising out of and in the course of employment. See O.C.G.A. §34-9-1(4). However, an employee need not be in perfect health when working for an employer. Every employer takes employees as they are. As such, if an employee has a pre-existing condition, work may “aggravate” a pre-existing condition. See, e.g., Colonial Stores, Inc. v. Hambrick, 176 Ga. App. 544, 546-547, 336 S.E.2d 617, (1985) (An employee need not be in perfect health as the employer takes the employee as it finds him—an aggravation of pre-existing condition is compensable); Brown Transport Corporation v. Jenkins, 129 Ga. App. 457, 199 S.E.2d 910(1973); Thomas v. Ford Motor Company, 123 Ga. App. 512, 181 S.E.2d 874 (1971); Davis v. Bibb Mfg. Co., 75 Ga. App. 515, 43 S.E.2d 780 (1947). An aggravation of a pre-existing condition is considered a work-related injury. Id.; O.C.G.A. §34-9-1(4); Chevrolet-Pontiac-Canada Group v. Millar, 182 Ga. App. 889, 357 S.E.2d 598 (1987).
20. After carefully considering the record as a whole, I find this is a close case. However, I find the preponderance of competent and credible evidence indicates the employee’s current back condition, and corresponding request for workers’ compensation benefits, is not causally related to his work with the employer.
21. In this claim, I find the employee’s testimony regarding when/how his back pain developed is not sufficiently similar or consistent with how he reported his back pain to medical providers.
22. The employee testified that he developed back pain while working on or around March 11, 2023. (T. 28-30, D-10, pp. 25-30). The employee sought medical treatment at the emergency room. The records from the emergency room indicated the employee reported left lower extremity pain for the past three weeks rather than any acute pain from work on or around March 11, 2023. (D-1, p. 1, C-5).
23. The employee was off work March 13, 2023, and March 14, 2023. The employee testified that he returned to work on March 16, 2023. (T. 30-32). However, the employee again had to leave work and sought medical treatment at the emergency room. The employee reported left leg and low back pain. (D-2, p. 7, C-5). These records do not indicate that the employee reported any of his back pain was associated with his work with the employer.

24. On March 24, 2023, the employee was evaluated by Dr. Zain Boghani. (C-5, pp. 12-14, D-3). According to Dr. Boghani's notes, the employee reported his back pain being present for four months. (D-3, pp. 4-5). The employee did not report any recent pain developing or occurring while working with the employer in March of 2023. Id., D-10, p. 33.
25. I find this evidence indicates the employee's current back condition is less likely due to his work with the employer.
26. In addition, I find persuasive the opinions of two medical providers who indicate the employee's current back condition is not related to his work with the employer. I find the employee's treating physician, Dr. Boghani, issued an opinion letter on June 12, 2023. (D-7). Dr. Boghani indicated that the employee did not report to him that his back condition was a work-related condition. Further, Dr. Boghani opined that the employee's low back pain and need for surgery were not related to the employee's work with the employer. (D-7). I find Dr. Dopson's opinion is similar to Dr. Boghani's opinion. (D-8).
27. Based upon the foregoing, I find the preponderance of competent and credible evidence does not reveal the employee's current back condition is related to his work with the employer either as an injury, or aggravation thereto. As such, because the preponderance of competent and credible evidence does not causally reveal the employee's current back condition is related to his work with the employer, I find the employee would not be entitled to workers' compensation benefits as requested.

AWARD

1. Based upon the foregoing findings of fact and conclusions of law, the employee's request for this claim to be found compensable is denied.
2. The employee's request for workers' compensation benefits is denied.

IT IS SO ORDERED, this the 06th day of September, 2024.

STATE BOARD OF WORKERS' COMPENSATION

This order has been electronically signed and approved

/s/ DAVID K. IMAHARA

ADMINISTRATIVE LAW JUDGE



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This appeal by the Employee is before the Appellate Division for review of an award by Judge Imahara, dated September 6, 2024. No cross-appeal was filed in this case. The Appellate Division heard this appeal on October 30, 2024. After a review of the record as a whole and the arguments presented, the Appellate Division now reverses the findings of fact, conclusions of law, and award of Judge Imahara.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This case came before the administrative law judge (ALJ) on July 9, 2024, to determine the Employee's entitlement to indemnity benefits resulting from a work-related "gradual onset" aggravation back injury while working for the Employer/Insurer. The Employer/Insurer asserted the Employee's back condition did not arise out of and in the course of his employment with the Employer/Insurer. On September 6, 2024, the ALJ issued an award denying the Employee's claim, finding the preponderance of evidence revealed the Employee's current back condition is not causally related to his work with the Employer/Insurer. The Employee appealed.

After careful consideration of the record as a whole, we hold the ALJ's award denying compensability of the Employee's gradual onset injury with the Employer/Insurer for lack of causation is not supported by the preponderance of competent, credible evidence in the record on review. Therefore, we reverse, as follows.

Record Evidence Relevant to Gradual Onset Injury

The Employee began working at the Employer, a food manufacturer, through a temporary staffing agency in November of 2022. He was hired by the Employer as a permanent employee on February 19, 2023. Both before and after the Employee was permanently hired by the Employer, he performed the same job as a packaging helper under the Employer's supervision.

The Employee's job duties involved lifting bakery products onto trays, removing products from conveyor belts and onto pallets or rollers, moving pallets and boxes,

sweeping, pushing 200-pound tubs of yeast, and cleaning machines. The Employee worked 12-hour shifts and some overtime hours and was on his feet for the entire shift. The physical requirements of the Employee's job included frequent bending, reaching, and stretching to handle or operate equipment, machinery, or other objects, carrying products weighing up to 25 pounds, and lifting 50 pounds without assistance.

The Employee testified he started experiencing intermittent back pain while performing his packaging job sometime in December 2022. However, the undisputed evidence shows his pain symptoms did not prevent him from performing his full-duty job or any of his job duties, and he continued to work long hours and overtime. On February 23, 2023, after being permanently hired, the Employee took and passed a physical exam required by the Employer/Insurer.

The Employee testified that between February 19, 2023, and March 4, 2023, his back pain symptoms worsened as new symptoms developed. The Employee noticed that his intermittent back pain occasionally radiated to his left leg while performing his job duties. The Employee testified his pain was alleviated when he went home and lay down. Despite this onset of radiating pain, the Employee performed his regular job duties, including working overtime, and did not seek medical treatment or take any sick leave.

On March 11, 2023, the Employee reported to work for a twelve-hour shift at the Employer. Approximately halfway through his shift, the Employee experienced back pain radiating down his left side to the extent that he had to leave work. This was the first time the Employee missed work because of back pain. On March 12, he reported to the hospital emergency room. Emergency room records show the Employee reported left lower extremity pain for the past three weeks and that he worked standing on his feet all day. The treating physician reviewed the Employee's records from an Employer-required physical on February 23, 2023, and did not document any abnormalities from that exam. The Employee was diagnosed with lower limb pain and discharged the same day.

The Employee returned to work. However, on March 16, 2023, the Employee's back pain worsened to the extent he again left work early. The Employee returned to the emergency room on March 17, 2023. An MRI was recommended at the hospital, which revealed herniations at L3-4 and L4-5. Dr. Samir Patel noted that while the Employee had been experiencing leg pain for roughly three weeks, his pain had become severe over the last three days. (C-5, p. 10). The Employee's reported pain report was consistent with his exam, which revealed lumbar spinal point tenderness, and a positive left leg raise. (C-5, p. 7). Neither of those findings were present on the Employee's previous March 12, 2023, medical exam records. (C-5, p. 4). The Employee was discharged from the emergency room the next day.

On March 24, 2024, the Employee was evaluated by neurosurgeon Dr. Zain Boghani. (C-5, pp. 12-13; D-3). After evaluating the Employee, including reviewing the Employee's recent MRI, Dr. Boghani indicated the Employee had a ruptured disc at L4-5 with compression of the L5 nerve root and radiculopathy. Dr. Boghani recommended an L4-5 microdiscectomy. He also wrote a letter stating the Employee should remain out of work for six weeks after surgery. (C-5, p. 14). The Employee subsequently underwent back surgery.

On June 12, 2023, Dr. Boghani completed a questionnaire from the Employer/Insurer, opining that the Employee may return to work without restrictions. (D-7).

On June 17, 2023, the Employer/Insurer mailed the Employee a letter stating he was on approved Family Medical Leave and his Employer-sponsored health insurance would remain active during his leave. (C-7, p.1).

On July 6, 2023, the Employee returned to Dr. Boghani and explained he had improved since surgery but was still in pain. (C-5, p. 25). Dr. Boghani agreed to excuse the Employee from work for an additional 4 weeks. (C-5, p. 25)

On August 23, 2023, the Employee underwent an Employer IME with Dr. Thomas Dopson, who concluded the Employee's back condition "was not related to incident or injury" at the Employer/Insurer. (D-8, p. 3).

On October 24, 2023, the Employee treated at Longstreet Clinic for his ongoing back pain. (C-5, p. 27). His exam revealed lumbar tenderness, and he was physically unable to undergo a straight leg raise test. (C-5, p. 30). The Employee subsequently participated in physical therapy from November 2023 through January 2024. (C-6, pp. 2-10). He followed up at Longstreet Clinic with Dr. Kommerina Daling on January 25, 2024. (C-5, p. 31). On examination, Dr. Daling observed "severely restricted" range of motion and extension. (C-5, pp. 33-34). Dr. Daling further noted the Employee had an impaired gait "secondary to back immobility." (C-5, p. 34).

On February 6, 2024, the Employee returned to Dr. Boghani's office. (C-5, p. 35). The Physician's Assistant documented a positive bilateral Faber's test and tenderness to palpitation in the lumbar spine. (C-5, p. 37). The Employee reported that many of his preoperative symptoms had resolved, but he continued to have low back pain with intermittent radiation to buttocks. (C-5, p. 36). The Physician's Assistant recommended an updated lumbar spine MRI and evaluation for possible epidural steroid injections to the lumbar spine. (C-5, p. 35).

Georgia Law Applicable to Gradual Onset Injury

The Employee has the burden of proof to show by a preponderance of competent and credible evidence that his injuries arose out of and in the course of his employment with the Employer/Insurer. See Holt Service Company v. Modlin, 163 Ga. App. 283, 293 S.E.2d 741 (1982); Zamora v. Coffee General Hospital, 162 Ga. App. 82, 290 S.E.2d 192 (1982); Dasher v. City of Valdosta, 217 Ga. App. 351, 457 S.E.2d 259 (1995); Jones v. Fieldcrest Mills, Inc., 162 Ga. App. 848, 292 S.E.2d 523 (1982). “Proof by a preponderance simply requires that the evidence show that something is more likely true than not.” White v. Stanley et al., 369 Ga. App. 330, 893 S.E.2d 466 (2023) *citing* White v. State, 307 Ga. 601, 607(3)(b), 837 S.E.2d 838 (2020). To meet this burden, the Employee must prove a causal connection between the Employee’s work and his resulting injuries to show a claim is compensable (*i.e.*, entitlement to workers’ compensation benefits). See O.C.G.A. § 34-9-1(4).

“Injury” under the Workers’ Compensation Act means only injury by accident arising out of and in the course of employment. See O.C.G.A. § 34-9-1(4). However, an employee need not be in perfect health when working for an employer. See, *e.g.*, Colonial Stores, Inc. v. Hambrick, 176 Ga. App. 544, 546-547, 336 S.E.2d 617 (1985) (An Employee need not be in perfect health as the employer takes the Employee as it finds him—an aggravation of pre-existing condition is compensable); Brown Transport Corporation v. Jenkins, 129 Ga. App. 457, 199 S.E.2d 910 (1973); Thomas v. Ford Motor Company, 123 Ga. App. 512, 181 S.E.2d 874 (1971); Davis v. Bibb Mfg. Co., 75 Ga. App. 515, 43 S.E.2d 780 (1947). Aggravation of a pre-existing condition is considered a work-related injury. *Id.*; O.C.G.A. § 34-9-1(4); Chevrolet- Pontiac-Canada Group, v. Millar, 182 Ga. App. 889, 357 S.E.2d 598 (1987).

If employment contributes to the aggravation of a pre-existing injury, it is an accident under Georgia's compensation law and is compensable, and it is not necessary that there be a specific job-connected incident that aggravates the previous injury. Savannah Hospitality Services, LLC v. Scriven, 350 Ga. App. 195, 828 S.E.2d 423 (2019). Cumulative trauma over time, which does not lend itself to identifying a specific incident or date as the onset of the injury, may be found to be an injury under O.C.G.A. § 34-9-1(4). D.W. Adcock, M.D., P.C. v. Adcock, 257 Ga. App. 700, 572 S.E.2d 45 (2002).

In the context of a case of gradual onset injury, “the date of such an injury is the date the employee is required to cease work.” McAdoo v. Metropolitan Atlanta Rapid Transit Auth., 326 Ga. App. 788, 791, 755 S.E.2d 278, 281 (2014). See *also* Impress Communications v. Stanley, 202 Ga. App. 226, 414 S.E.2d 238 (1991).

Discussion

After a careful review of the record as a whole, we find the preponderance of competent, credible evidence, in this case, clearly supports that the Employee sustained a compensable gradual onset injury causally connected to his employment with the Employer/Insurer.

The Employee's hospital emergency room records reported the Employee had been experiencing radiating pain for three weeks but that "*over the past 3 days pain has become severe.*" (C-5, pp. 9-10). Similarly, the Employee testified that on March 11, 2023, his symptoms of "radiating pain in the lower left part of my back and my legs" became painful to the point he had to leave work and seek treatment at the emergency room. (T. 28-29). The Employee further testified that he had some pain radiating into his leg starting in late February, but he was able to work through the pain because it was "just mild. Wasn't nothing major," and that prior to March 11, 2023, he never had to leave work early because of his pain. (T. 29). Also, the Employee testified he experienced some mild back pain when he was still working as a temporary employee in December 2022. (T. 23, D-10, pp. 23-24).

Importantly, in considering whether the Employee's testimony supports causation, the Employee testified the pain he felt in December and February did not prevent him from performing any of his job duties. (T. 19, 23-24). This uncontroverted testimony is consistent with all the evidence. The Employee did not seek any medical care or miss any work from December 2022 through February 2023 and frequently worked overtime. (T. 21-22, C-2, pp. 2-7). The Employee's testimony that he first developed *severe* pain while performing his work duties in March 2023, when he left work to seek emergency medical treatment, is also supported by the medical records. (T. 28-29, 32; C-5, p. 10). We find the greater weight of the evidence – medical, testimonial, and documentary exhibits – establishes the Employee's back pain went from mild to debilitating while performing his physically demanding job duties for the Employer/Insurer until he went out of work as a permanent employee of the Employer/Insurer in March 2023.

Therefore, after careful consideration of all medical, documentary, and testimonial evidence in the record, taken as a whole, and the arguments of the parties, we conclude the preponderance of competent, credible evidence reflects - *more likely than not* - that the Employee sustained a gradual onset aggravation back injury causally related to the performance of his job duties while working for the Employer/Insurer, which manifested on the date he went out of work to seek emergency medical treatment for his work injury, March 16, 2023. See JMJ Plumbing v. Cudihy *supra*.

Where the ALJ made findings of fact and conclusions of law contrary to the foregoing, we reverse, strike, and amend his findings and conclusions to remain consistent with our findings and conclusions herein. See Bankhead Enterprises v. Beavers, 267 Ga. 506, 480 S.E.2d 840 (1997); Russ v. American Telephone & Telegraph, 228 Ga. App. 858, 493 S.E.2d 46 (1997); Bennett-Murray, Inc. v. Barnes, 222 Ga. App. 137, 473 S.E.2d 166 (1996).

AWARD

WHEREFORE, the Appellate Division vacates the award of Judge Imahara, dated September 6, 2024, and replaces it with the following:

The Employee's request for temporary total disability benefits from March 17, 2023 and continuing, with 15% late-payment penalties on all accrued benefits past due, and medical treatment for the Employee's work-related back injury in accordance with O.C.G.A. § 34-9-200, is granted.

As stated in the ALJ's September 6, 2024 award, the parties agreed that should this claim be found compensable, the parties will work out the payment/reimbursement of any medical expenses associated with the Employee's work-related injuries, subject to the fee schedule. (ALJ Award, p. 2, T. 4-5). Pursuant to Board Rule 201(2)(b), the parties are directed to designate the authorized treating physician.

IT IS SO ORDERED, this the 28th day of February, 2025.

Concurring: Presiding Judge Benjamin J. Vinson and Judge Neera Bahl.

STATE BOARD OF WORKERS' COMPENSATION

This award is electronically signed and approved.

Frank R. McKay

**Judge
Appellate Division**

The appellate procedure set forth in O.C.G.A. § 34-9-105 governing appeals of any final order or award from the members of the Board (Appellate Division) to higher courts changed effective July 1, 2023. This new procedure applies to appeals to the superior court **filed on or after July 1, 2023. Please refer directly to O.C.G.A. § 34-9-105 (effective July 1, 2023), Board Rule 105 (effective July 1, 2024), and the Superior and State Court Appellate Practice Act, O.C.G.A. §§ 5-3-1 to 5-3-21 (effective July 1, 2023) for specific requirements and procedures.*

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