

SUPREME COURT OF OKLAHOMA

Maddox v. Sooner Completions, Inc.

Maddox, 2015 OK 63 (Okla. 2015) · No. 114189 · Decided October 12, 2015

SUMMARY

The Oklahoma Supreme Court dismissed a claimant's direct review proceeding from a Workers' Compensation Administrative Law Judge's order. The court held that, under the applicable Workers' Compensation Act, the claimant was required to appeal first to the Workers' Compensation Commission before seeking review in the Supreme Court.

CASE DETAILS

COURT	Supreme Court of Oklahoma
JURISDICTION	Oklahoma
DECIDED	October 12, 2015
DOCKET	114189
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought direct review in the Oklahoma Supreme Court of a Workers' Compensation Administrative Law Judge's order denying compensability and dismissing his claim, without first appealing to the Workers' Compensation Commission.
STANDARD OF REVIEW	The court addressed its subject-matter jurisdiction and the statutory exhaustion and appellate procedure requirements de novo.
PRECEDENTIAL VALUE	The opinion states a jurisdictional and procedural rule concerning the statutory sequence for reviewing Oklahoma workers' compensation decisions. The opinion was marked as not released for publication and subject to revision or withdrawal at the time of issuance.
PARTIES	Bradley Neal Maddox v. Sooner Completions, Inc., Bitco General Insurance Company (f/k/a Bituminous Casualty Company), Workers' Compensation Commission

TOPICS

workers compensation

appellate procedure

exhaustion of remedies

judicial review of agency action

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PRACTICE AREAS

workers compensation

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appellate procedure

QUESTIONS PRESENTED

1. Whether the Oklahoma Supreme Court had jurisdiction to directly review a Workers' Compensation Commission ALJ order without a prior appeal to the Commission.
2. Whether the workers' compensation procedures in effect when Maddox was injured required him to appeal the ALJ's decision to the Commission before seeking Supreme Court review.

HOLDINGS

1. Because the alleged injury occurred after the Workers' Compensation Act became effective on February 1, 2014, the current Act applied, and Maddox was required to follow the appellate procedure in 85A O.S. Supp. 2013 § 78.
2. The Oklahoma Supreme Court lacks jurisdiction to consider a direct appeal from a Workers' Compensation Commission ALJ ruling when the claimant has not first timely appealed to the Commission.

KEY QUOTATIONS

“This Court lacks jurisdiction to consider a direct appeal from a ruling by the ALJ.”

“This cause must be dismissed pursuant to 85A Supp. 2013 §78 because petitioner failed timely to appeal the decision of the ALJ to the Workers' Compensation Commission before seeking relief in this Court.”

FACTUAL BACKGROUND

Maddox alleged that he suffered a workplace injury in August 2014. The Workers' Compensation Commission ALJ denied compensability and dismissed his claim. Maddox did not appeal the ALJ's order to the Commission before seeking review in the Oklahoma Supreme Court.

PROCEDURAL HISTORY

Maddox commenced a workers' compensation proceeding alleging an August 2014 injury. On July 22, 2015, the Commission's ALJ denied compensability and dismissed the claim. Rather than appeal to the Commission, Maddox filed a review proceeding in the Oklahoma Supreme Court within twenty days of the order being sent to the parties. Respondents moved to dismiss, arguing that Oklahoma law required an appeal to the Commission before Supreme Court review.

DISPOSITION

dismissed

CASES CITED

- Williams Companies, Inc. v. Dunkelgod, 2012 OK 96, ¶ 32, 295 P.3d 1107

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