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**WORKERS' COMPENSATION  
ONE-LINERS  
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Attorney's Fees:  
Elliott v. WCAB,  
795 A.2d 480

Commonwealth Court awards attorney's fees to claimant's attorney under PA R.A.P. 2744 where employer's appeal was "merely an invitation to re-assess credibility and re-weigh evidence;" notably costs, including fees, are not limited to claimants under this Rule.

Course of Employment:  
Camino v. WCAB,  
796 A.2d 412

Commonwealth Court holds applicability of positive work order violation defense available only when prohibited activity is so foreign to employment duties as to render the claimant a "trespasser," thereby reversing WCJ and WCAB denial of benefits to launderer who was injured while mopping floors.

Compromise & Release:  
Dept. of Corrections  
v. WCAB,  
794 A.2d 97

Where claimant testified by phone from his hospital bed and died a few hours after hearing, Commonwealth Court refused to reverse WCJ's approval of compromise and release, finding defendant could show no material misrepresentation by claimant or counsel.

Credits:  
Kramer vs. WCAB,  
794 A.2d 953

Essentially limiting Section 204 credits to self insured employers, Commonwealth Court rules credit for severance payments made by employer is not available where insurer is directly liable for compensation payments, reasoning that credit in that instance does nothing to advance costs reduction goals of Act 57.

Petition to Review:  
Mitchell v. WCAB,  
796 A.2d 1015

In a case defended by this editor, Commonwealth Court remanded to WC Judge to apply equitable doctrine of laches where claimant waited 11 years to bring petition for review seeking review of average weekly wage; despite no time limit in Section 413 to bring the petition court rules due diligence must be exercised.

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