Sections of an Appellee's Responsive Brief

These pages are provided as examples of the sections of an appellee's responsive brief. You may use these pages for your brief, adding more pages if needed, or you may use them as a model to write your own brief. The sections of an appellee's brief are:

- 1. A section discussing why you disagree with the arguments in the appellant's brief.
- 2. A short conclusion stating what the Commission should do to resolve the appeal.

You <u>may</u> address in the brief the following sections in appellant's brief, <u>if you disagree</u> with the statements appellant made:

- 1. Statement of the issues presented for review.
- 2. Statement of the facts.
- 3. Brief description of the proceedings before the Board.
- 4. <u>Statement of the applicable standard of review</u>. If asking for the <u>application of a different standard of review</u> from the one appellant used, you must state what standard of review the Commission should apply. The standards for Commission review that the Commission applies are set out in AS 23.30.128(b). If you disagree with the standard of review appellant used, you may refer to another legal authority or AS 23.30.128(b).

<u>In a cross-appeal</u>, your brief must also include a section discussing your claims of error <u>and</u> the claims of error raised in the original appellant's brief.

Appellant's Arguments that I Disagree With

Ι	disagree	with	the	following	arguments	in	the	appellant's	brief	for	the	following
re	asons:											
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Other Sections of the Appellant's Brief that I Disagree With

If you disagree with the appellant's statements in the following brief sections, you may write your arguments here. The sections are 1) statement of the issues presented for review, 2) statement of the facts, 3) description of the proceedings before the Board, and 4) statement of the applicable standard of review.

I disagree with the appellant's statements regarding
(Attach more pages if needed

Conclusion

Summarize what your position is very briefly and tell the Commission what you want it do. For example, you may ask the Commission to REVERSE the Board's decision, VACATE (invalidate) the decision and REMAND (send the case back) to the Board to allow more evidence or rehear the case, or MODIFY the Board's decision. Do not ask to Commission to do what the Commission does not have the power to do, such as awayou benefits or order the employer to rehire you. Sign and date the brief, and if you have an assistant to help you, verify that you read and understood the brief, and that it is yo brief.	to he ird ad
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