

**RECEIVED**  
**Jul 13 2022**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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WCC File No. 1514359  
Court of Appeals Case No. 2021-000633

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Rachel J. Turner, Employee.....Appellant-Respondent,

v.

Medustrial Healthcare Staffing Service and Condustrual, Inc.;  
Guarantee Insurance Company; Countrywide Staffing Solutions Group, Inc.;  
South Carolina Department of Corrections;  
State Accident Fund; and South Carolina Uninsured Employer's Fund..... Respondents.

of which Condustrual, Inc. f/k/a Medustrial Healthcare Staffing Service, Employer, is the  
Respondent-Appellant.

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S FINAL BRIEFS**

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Pursuant to Rules 211 and 240 of the South Carolina Appellate Court Rules, Respondent  
Guarantee Insurance Company moves this Court for an order granting an extension of time for  
Respondent to serve and file Respondent's Final Briefs.<sup>1</sup> The Record on Appeal filed with this  
Court on June 23, 2022, omits matters identified by Respondent on Respondent's Designation of  
Matter to be Included in the Record on Appeal. Respondent informed Appellant-Respondent of

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<sup>1</sup> Respondents South Carolina Property and Casualty Insurance Guaranty Association on behalf of  
Guarantee Insurance Company and Countrywide Staffing Solutions Groups, Inc. jointly filed  
concurrent Initial Briefs to Respondent-Appellant Condustrual, Inc. f/k/a Medustrial Healthcare  
Staffing Service and Appellant-Respondent Rachel Turner's Initial Briefs of Appellants.

the omissions. Respondent requests an additional 20 days from service of the Supplemental Record on Appeal to file and serve Final Briefs. This is Respondent's first request for an extension to file and serve Respondent's Final Briefs.

Additionally, the undersigned Respondent requests that all filing/service deadlines be held in abeyance pending the Court's ruling on this motion.

WE SO MOVE:

ROBINSON GRAY STEPP & LAFFITTE, LLC

By:  \_\_\_\_\_

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Attorneys for Respondent

Columbia, South Carolina  
July 12, 2022

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State Accident Fund; and South Carolina Uninsured Employer's Fund..... Respondents.

of which Condustrual, Inc. f/k/a Medustrial Healthcare Staffing Service, Employer, is the  
Respondent-Appellant.

**PROOF OF SERVICE**

I certify that I have caused the **Guarantee Insurance Company's Motion for Extension of Time to File Respondent's Final Brief** to be served on all attorneys of record by electronic mail on July 13, 2022 at the following addresses:

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*Attorneys for Respondent South Carolina  
Property and Casualty Insurance Guaranty  
Association on behalf of Guarantee  
Insurance Company*

July 13, 2022

**From:** [Cynthia D. Nygord](#)  
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**Subject:** Turner v. Guarantee Insurance Company, et al - Guarantee's Motion for Extension [IMAN-CLIENTS.FID59158]  
**Date:** Wednesday, July 13, 2022 10:17:46 AM  
**Attachments:** [image001.png](#)  
[2022-7-13 - Guarantee Insurance Company's Motion for Extension of Time to File Respondent's Final Briefs.pdf](#)  
[2022-7-13 - Proof of Service - Guarantee's Motion for Extension of Time to File Respondent's Final Brief.pdf](#)

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Dear Counsel of Record:

Pursuant to [Rule 262\(c\)\(3\), SCACR](#), attached for service upon you via email is Guarantee's Motion for Extension of Time to File Respondent's Final Brief, as well as a Proof of Service, being filed in the SC Court of Appeals this morning.

Should you have any questions or concerns, please don't hesitate to contact us.

Please note that a copy of this email will be filed with the Proof of Service.

With kindest regards,

Cyndi Nygord



**CYNDI NYGORD** PARALEGAL

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