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**Jul 13 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

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Appellate Case Number 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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**RESPONDENT-APPELLANT CONDUSTRUAL'S MOTION FOR EXTENSION TO  
FILE FINAL BRIEFS**

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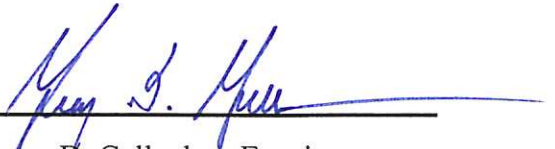
Appellant- Respondent's Motion is based on the following:

- 1) Appellant-Respondent filed/served the Record on Appeal on June 23, 2022. Pursuant to SCACR 211 Final Briefs from the parties are due 20 days thereafter- July 13, 2022.
- 2) At least one party to this matter has discovered omissions from the Record on Appeal, which may require the filing of an amended Record on Appeal and/or a Supplemental Record/Appendix per SCACR 212. Given the voluminous record in this matter, mistakes and omissions are certainly understandable to the Appellant-Respondent.
- 3) Counsel for the parties have agreed in principle to attempt to reconcile any discrepancies with the Record on Appeal via consent. Pending, those efforts filing final briefs at this

juncture based on an incomplete or otherwise erroneous Record on Appeal may be superfluous and necessitate additional filings later.

- 4) For these reasons, Respondent-Appellant submits that the interests of judicial economy and attorney workload considerations favor an extension for filing its Final Briefs pending ongoing efforts of the parties to reconcile the Record on Appeal.

Respectfully submitted,



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

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**PROOF OF SERVICE**

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I certify that I have served the Motion for Extension of Time to File Respondent-Appellant Condustrual, Inc.'s Consolidated Final Briefs to all parties by electronic mail and/or by depositing a copy of it in the United States Mail, postage prepaid, on July 13, 2022, addressed to all attorneys of record at the addresses below:

The Honorable Amy Bracy  
Judicial Director  
S.C. Workers' Compensation  
Commission  
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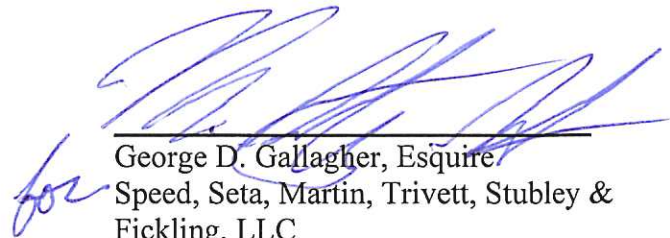
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July 13, 2022

  
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GEORGE D. GALLAGHER (SC)

July 13, 2022

VIA EMAIL: CTAPPFILINGS@SCCOURTS.ORG

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE:** *Rachel Turner v. SC Department of Corrections – Kirkland, et al*  
*Appellate Case No.: 2021-000633*  
*WCC No.: 1514359*  
*DOA: 9/5/2015*  
*Our File No.: 8400-0101*

Dear Ms. Kitchings:

Please find enclosed Respondent-Appellant Condustrial's Motion for Extension to file Final Briefs in the above-referenced matter. Our firm's check in the amount of \$50.00 for the filing fee has been placed in the mail to your office.

By copy of this letter to all counsel of the involved parties, I am serving them with this Motion.

Sincerely,

  
George D. Gallagher, Esquire

GDG/rco  
Enclosure

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Jul 13 2022

SC Court of Appeals

cc: The Hon. Amy Bracy  
Stephen B. Samuels, Esq.  
Erin Farthing, Esq.  
Gregory M. Alford, Esq.  
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