

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Jul 13 2022**

**SC 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 BRIEF

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Pursuant to Rules 211 and 240 of the South Carolina Appellate Court Rules, Respondent  
Countrywide Staffing Solutions Group, Inc. 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

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<sup>1</sup> Respondent Countrywide Staffing Solutions Groups, Inc. and South Carolina Property and  
Casualty Insurance Guaranty Association on behalf of Guarantee Insurance Company 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.

Designation of Matter to be included in the Record on Appeal. Respondent informed Appellant-Respondent of 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 service 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:

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By: s/ Gregory M. Alford  
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Attorney for Respondent  
Countywide Staffing Solutions  
Group, Inc.

Hilton Head, South Carolina  
July 13, 2022

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

Medustrial Healthcare Staffing Service and Condustral, 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 Condustral, 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 caused the Countrywide Staffing Solutions Group, Inc.'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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Hilton Head, South Carolina  
July 13, 2022