

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Commissioners T. Scott Beck, R. Michael Campbell, II, and Gene McCaskill

Appellate Case No. 2021-000633

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.

**MOTION FOR EXTENSION TO FILE FINAL BRIEFS OF
APPELLANT-RESPONDENT**

Appellant-Respondent, by and through her undersigned attorney, hereby moves this Honorable Court for an extension in which to file the **Final Briefs of Appellant-Respondent**. The Final Briefs of Appellant-Respondent is due on July 13, 2022.

As grounds for granting an extension, Appellant Respondent would show Respondent South Carolina Department of Corrections filed a motion to strike part of Appellant-Respondent's Brief. In response, Appellant-Respondent filed an amended Initial Brief of Appellant-Respondent. Appellant-Respondent requests the time for filing final briefs be stayed until the Court rules on SCDC's motion.

Appellant-Respondent further requests that in its Order ruling on SCDC's motion, that the Court provide additional time for filing final briefs from 15-20 days following the order.

Respectfully Submitted



Stephen B. Samuels
Samuels Reynolds Law Firm, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000
stephen@samuelsreynolds.com
Attorney for Appellant-Respondent

July 13, 2022

Columbia, South Carolina

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SC Court of Appeals

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APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Commissioners T. Scott Beck, R. Michael Campbell, II, and Gene McCaskill

WCC File No. 1514359
Appellate Case No. 2021-000633

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v.

Medustrial Healthcare Staffing Service and Conustrial, Inc.;
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Group, Inc.; South Carolina Department of Corrections; State
Accident Fund; and South Carolina Uninsured Employer's Fund, . . . Respondents

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

PROOF OF SERVICE

I certify that I, Wanda Powell, Paralegal to Stephen B. Samuels have caused
the **Motion for Extension to File Final Brief of Appellant-Respondent** to be
served on the parties below, via electronic service addressed as follows:

Erin Farthing, Esquire
State Accident Fund
PO Box 1166
Lexington, SC 29071
efarthing@saf.sc.gov

Gregory M. Alford, Esquire
PO Drawer 8008
Hilton Head Island, SC 29938
gregg@alfordlawsc.com

Lisa C. Glover, Esquire
SC Uninsured Employers' Fund
PO Box 1815
Lexington, SC 29071
lglover@saf.sc.gov

T. Jeff Goodwyn, Esquire
2309 Devine Street
Columbia, SC 29205
Jgoodwyn@Goodwynlaw.com

Beth Richardson, Esquire
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211
brichardson@sowellgray.com

Grady L. Beard, Esquire
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211
gbeard@robinsongray.com

James P. Newman, Jr., Esquire
Howser, Newman, Besley, LLC
PO Box 12009
Columbia, SC 29211
jnewman@hnblaw.com

George D. Gallagher, Esquire
Speed, Seta, Martin, Trivett & Stubley
PO Box 11669
Columbia, SC 29211
ggallagher@speed-seta.com



Wanda Powell, Paralegal

July 13, 2022



STEPHEN B. SAMUELS
P. JASON REYNOLDS
C. DAVID BEALE, JR.
ATTORNEYS AT LAW

July 13, 2022

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SC Court of Appeals

Via email: ctappfilings@sccourts.org

Via hand delivery

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: Rachel J. Turner v. Medustrial Healthcare
Appellate Case No. 2021-000633

Dear Ms. Kitchings:

Enclosed for filing please find our **Motion for Extension to File the Final Brief of Appellant-Respondent** regarding the above referenced matter.

If you would kindly have your staff file the **Motion for Extension of Time to File the Final Brief of Appellant-Respondent** and return a clocked copy to me.

Respectfully,

A handwritten signature in blue ink, appearing to read "SBS", is written over a blue horizontal line.

Stephen B. Samuels

SBS/wp

Enclosure(s) as stated

cc: Erin Farthing, Esquire
James P. Newman, Jr., Esquire
Lisa C. Glover, Esquire
Grady L. Beard, Esquire
Gregory M. Alford, Esquire
George D. Gallagher, Esquire
Beth Richardson, Esquire
T. Jeff Goodwyn, Esquire

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1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSREYNOLDS.COM