

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

97093  
**RECEIVED**

SEP 09 2022

**SC 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 a 7-day extension in which to file the **Final Briefs of Appellant-Respondent and Third Supplemental Record on Appeal**. The Final Briefs of Appellant-Respondent are due on September 9, 2022. If the extension is granted, the Final Briefs will be due on September 16, 2022.

As grounds for granting an extension, Appellant-Respondent would show the parties designated certain exhibits and pleadings related to Turner's Motion to Submit Additional and After-Discovered Evidence. As originally prepared, the Record on Appeal included the motion but inadvertently omitted the attached exhibits. The exhibits are referenced in the Briefs.

Appellant-Respondent Turner requests an additional seven days in which to prepare and bind the Supplemental Record on Appeal containing these exhibits and her final briefs. Respondent-Appellant Condustrual also requests that its Return to the Motion be included in the Third Supplemental Record on Appeal. Appellant-Respondent Turner consents to this request.

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

September 9, 2022

Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

SEP 09 2022

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission **SC Court of Appeals**

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

WCC File No. 1514359  
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.

**PROOF OF SERVICE**

I certify that I, Katherine R. Helms, PP, SCCP, Paralegal for the Samuels  
Reynolds Law Firm have caused the **Motion for Extension to File Final Briefs of  
Appellant-Respondent** to be served on the parties below clearly marked on the date  
indicated below, addressed as follows

Erin Farthing, Esquire  
State Accident Fund  
PO Box 1166  
Lexington, SC 29071  
[efarthing@saf.sc.gov](mailto:efarthing@saf.sc.gov)

Gregory M. Alford, Esquire  
PO Drawer 8008  
Hilton Head Island, SC 29938  
[gregg@alfordlawsc.com](mailto:gregg@alfordlawsc.com)

Lisa C. Glover, Esquire  
SC Uninsured Employers' Fund  
PO Box 1815  
Lexington, SC 29071  
[lglover@saf.sc.gov](mailto:lglover@saf.sc.gov)

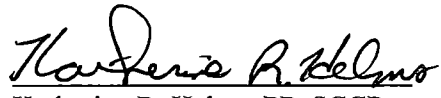
Jasmine Smith, Esquire  
Robinson Gray Stepp & Laffitte, LLC  
PO Box 11449  
Columbia, SC 29211  
[Jsmith@robinsongray.com](mailto:Jsmith@robinsongray.com)

Beth Richardson, Esquire  
Robinson Gray Stepp & Laffitte, LLC  
PO Box 11449  
Columbia, SC 29211  
[brichardson@sowellgray.com](mailto:brichardson@sowellgray.com)

Grady L. Beard, Esquire  
Robinson Gray Stepp & Laffitte, LLC  
PO Box 11449  
Columbia, SC 29211  
[gbeard@robinsongray.com](mailto:gbeard@robinsongray.com)

James P. Newman, Jr., Esquire  
Howser, Newman, Besley, LLC  
PO Box 12009  
Columbia, SC 29211  
[jnewman@hnblaw.com](mailto:jnewman@hnblaw.com)

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

  
Katherine R. Helms  
Katherine R. Helms, PP, SCCP

September 9, 2022



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

September 9, 2022

**RECEIVED**  
SEP 09 2022  
SC Court of Appeals

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 Staffing Service and  
Condustrual, Inc.  
Appellate Case No.: 2021-000633

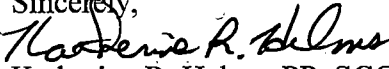
Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the **Motion for Extension to File Final Briefs of Appellant-Respondent Record on Appeal** along with our filing fee of \$50.00 in the above-referenced case. By copy of this letter and enclosure(s), we are serving defense counsel with a copy of the same as indicated by the attached **Proof of Service**.

Please have your staff clock in the **Motion** and return the clocked copy to our courier.

Thank you for your consideration in this matter. Feel free to contact us with any questions or if further information is needed from our office.

With kindest regards, I am

Sincerely,  
  
Katherine R. Helms, PP, SCCP  
Paralegal to Stephen B. Samuels

/krh

Enclosure(s) as stated

cc w/encl.: Erin Farthing, Esquire  
Gregory M. Alford, Esquire  
Lisa C. Glover, Esquire  
Jasmine D. Smith, Esquire  
Beth Richardson, Esquire  
Grady L. Beard, Esquire  
James P. Newman, Jr., Esquire  
George D. Gallagher, Esquire

WE WORK FOR THE PEOPLE WHO WORK