

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

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SEP 15 2022

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 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.

**PROOF OF SERVICE**

I certify that I, Wanda Powell, Paralegal for the Samuels Reynolds Law Firm  
have caused the **Respondent's Brief of Appellant-Respondent** to be served on the  
parties below clearly marked on the date indicated below, addressed as follows

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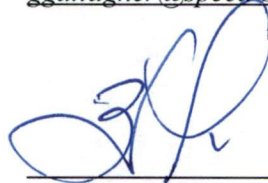
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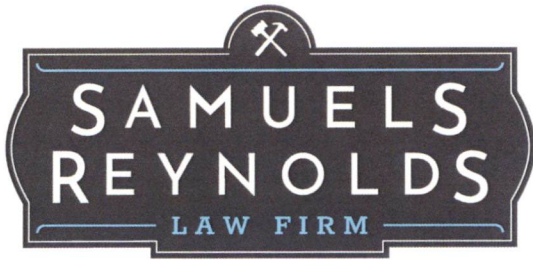
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Wanda Powell

September 15, 2022



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
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ATTORNEYS AT LAW

September 15, 2022

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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 one (1) unbound and one (1) bound copy the **Respondent's Brief of Appellant-Respondent** and **Proof of Service** in the above case.

Please have your staff file the **Respondent's Brief of Appellant-Respondent** and **Proof of Service** and return to us a clocked copy. Feel free to contact us with any questions or if further information is needed from our office.

Sincerely,

Stephen B. Samuels

SBS/wp

Enclosure(s) as stated

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