

**RECEIVED**

**Nov 29 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM THE SOUTH CAROLINA WORKERS' COMPENSATION  
APPELLATE PANEL

W.C.C. FILE NO. 1514359

APPELLATE CASE NO. 2021-000633

---

Rachel J. Turner, Employee,

Appellant-Respondent,

vs.

Medustrial Healthcare Staffing Service and Condustrual, Inc.;  
Guarantee Insurance Company; Countryside Staffing Solutions Group, Inc.;  
South Carolina Department of Corrections;  
South Carolina 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.

---

**NOTICE OF APPEARANCE**

---

The undersigned hereby certifies and advises this Court, the parties, and their attorneys, that Edwin P. Martin, Jr., of the South Carolina State Accident Fund, is appearing as additional counsel for Respondents South Carolina State Accident Fund and the South Carolina Department of Corrections in the above-captioned matter.

(Signature Page Follows)

s/Edwin P. Martin, Jr.  
Erin F. Farthing, Esquire  
Edwin P. Martin, Jr., Esquire  
Post Office Box 1166  
Lexington, South Carolina 29071  
803.896.5375

Attorneys for Respondent South  
Carolina Department of Corrections and  
the South Carolina State Accident Fund

November 29, 2023



**RECEIVED**

**Nov 29 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM THE SOUTH CAROLINA WORKERS' COMPENSATION  
APPELLATE PANEL

W.C.C. FILE NO. 1514359

APPELLATE CASE NO. 2021-000633

---

Rachel J. Turner, Employee,

Appellant-Respondent,

vs.

Medustrial Healthcare Staffing Service and Condustrail, Inc.;  
Guarantee Insurance Company; Countryside Staffing Solutions Group, Inc.;  
South Carolina Department of Corrections;  
South Carolina State Accident Fund; and South Carolina Uninsured Employer's Fund

Respondents.

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

---

**PROOF OF SERVICE**

---

I certify that I have caused the Notice of Appearance to be served on all attorneys  
of record by electronic mail on November 29, 2023 at the following electronic email  
addresses:

Erin Farthing, Esquire – [efarthing@saf.sc.gov](mailto:efarthing@saf.sc.gov)

Lisa C. Glover, Esquire – [lglover@saf.sc.gov](mailto:lglover@saf.sc.gov)

Gregory M. Alford, Esquire – [gregg@alfordlawsc.com](mailto:gregg@alfordlawsc.com)

T. Jeff Goodwyn, Esquire – [jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)

James P. Newman, Jr., Esquire – [jnewman@hnblaw.com](mailto:jnewman@hnblaw.com)

Stephen B. Samuels, Esquire – [Stephen@samuelsreynolds.com](mailto:Stephen@samuelsreynolds.com)

George D. Gallagher, Esquire – [ggallagher@speed-seta.com](mailto:ggallagher@speed-seta.com)

Grady L. Beard, Esquire – [gbeard@robinsongray.com](mailto:gbeard@robinsongray.com)

Beth B. Richardson, Esquire – [brichardson@robinsongray.com](mailto:brichardson@robinsongray.com)

Jasmine D. Smith, Esquire - [jsmith@robinsongray.com](mailto:jsmith@robinsongray.com)

s/Edwin P. Martin, Jr.  
Erin F. Farthing, Esquire  
Edwin P. Martin, Jr., Esquire  
Post Office Box 1166  
Lexington, South Carolina 29071  
803.896.5375

Attorneys for Respondent South  
Carolina Department of Corrections and  
the South Carolina State Accident Fund

November 29, 2023

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

---

APPEAL FROM THE S.C. WORKERS' COMPENSATION  
APPELLATE PANEL

W.C.C. FILE NO. 1322039

APPELLATE CASE NO. 2016-000997

---

HARRY REESE,

Appellant,

vs.

SOUTH CAROLINA DEPARTMENT OF MENTAL HEALTH and SC STATE  
ACCIDENT FUND,

Respondents.

---

**PROOF OF SERVICE**

---

I, Page Hilton, certify that I have served the within Motion to Strike and Require Amended Record on Appeal on Appellant by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

Harry Reese  
8408 Little John Drive  
Columbia, SC 29209

I further certify that all parties required by Rule to be served have been served.  
This 1st day of June, 2017.

---

PAGE HILTON, ESQUIRE  
S.C. BAR NO. 100239  
ATTORNEY FOR RESPONDENT  
P.O. BOX 102100  
COLUMBIA, SC 29210  
(803) 896-5896