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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Case Number 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 of Time to File Respondent/Appellant's Petition for Rehearing

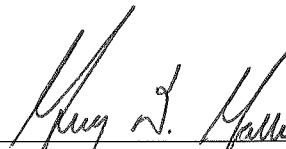
George D. Gallagher, Esquire
Speed, Seta, Martin, Trivett & Stublely, LLC
P.O. Box 11669
Columbia, SC 29211
(803) 748-2919
Attorney for Respondents

RESPONDENT/APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE ITS PETITION FOR REHEARING IS BASED ON THE FOLLOWING GROUNDS:

1. Respondent/Appellant's Petition for Rehearing of the Court's Decision in this matter filed on March 27, 2024 is currently docketed for filing on or before April 11, 2024 pursuant to SCACR 221 (a);
2. Counsel for Respondent/Appellant respectfully requests a ten (10) day extension of time for filing a Petition for Rehearing;
3. The need for this extension is due to Counsel's other deadlines, appearances, and obligations during the week of April 8, 2024 that have been accentuated by Counsel's Easter vacation during the previous week of April 1, 2024;
4. This is Respondent/Appellant's first motion for an extension of time with respect to filing its Petition for Rehearing; AND
5. This motion is not being made for purposes of unnecessarily delaying a timely disposition of this matter.

Accordingly, Respondent/Appellant requests an extension of time until Monday April 22, 2024 (10 day deadline falls on Sunday April 21, 2024) to file its Petition for Rehearing. Counsel thanks the Court in advance for its consideration of this request.

Respectfully Submitted,



George D. Gallagher, Esquire
Counsel for Appellant-Respondent Condustrial, Inc.
f/k/a Medustrial Healthcare Staffing
S.C. Bar # 12149

Columbia, SC
April 1, 2024

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

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Respondent-Appellant Condustrual, Inc.'s Petition for Rehearing by electronic mail on April 9th, 2024, addressed to all attorneys of record at the addresses below:

The Honorable Amy Bracy
Judicial Director
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April 9th, 2024

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RACHEL E. WEISSERT (GA)
∞
GEORGE D. GALLAGHER (SC)

April 09, 2024

VIA EMAIL: CTAPPFILINGS@SCCOURTS.ORG

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Rachel Turner v. SC Department of Corrections – Kirkland, et al*
Appellate Case No.: 2021-000633
WCC No.: 1514359
DOA: 9/5/2015
Our File No.: 8400-0101

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Dear Ms. Kitchings:

Please find enclosed Respondent-Appellant Condustrual's Motion for Extension of Time to file Petition for Rehearing in the above-referenced matter. Our firm's check in the amount of \$50.00 for the filing fee has been placed in the mail to your office.

By copy of this letter to all counsel of the involved parties, I am serving them with this Motion.

Sincerely,



George D. Gallagher
GDG/rco
Enclosures

cc: The Hon. Amy Bracy
Stephen B. Samuels, Esq.
Erin Farthing, Esq.
Gregory M. Alford, Esq.
Lisa C. Glover, Esq.
Beth Richardson, Esq.
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