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Apr 10 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

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.

Unpublished Opinion No. 2024-UP-110
Heard February 6, 2024 – Filed March 27, 2024

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT-RESPONDENTS' PETITION FOR REHEARING**

Appellant-Respondent, by and through her undersigned attorney hereby moves this Honorable Court for a 10-day extension of time in which to file her **Petition for Rehearing**. The Petition is currently due to be filed on April 11, 2024. Should the extension be granted, the Petition would be due on April 22, 2024.

As grounds for granting this Motion, Appellant-Respondent would show (1) Appellant-Respondent has not previously filed for an extension to file her Petition for Rehearing; (2) Respondent-Appellant has also filed a request for a 10-day extension (to which Appellant-Respondent consents), thus there is no prejudice to the opposing parties; (3) Counsel was traveling out of state during the first week following the issuance of the Opinion; and (4) due to the complexity of the case and Counsel's other deadlines and obligations during this period it has not been possible for the Petition to be written in final form.

Therefore, Appellant-Respondent moves the Court to grant the motion and permit the **Petition for Rehearing** to be filed on April 22, 2024.

Respectfully Submitted

A handwritten signature in blue ink, appearing to read 'S. B. Samuels', is written over a horizontal line.

Stephen B. Samuels
SAMUELS REYNOLDS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000
stephen@samuelsreynolds.com
Attorney for Appellant-Respondent

April 10, 2024

Columbia, South Carolina

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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 **Motion for Extension to File Appellant-Respondents' Petition
for Rehearing** 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

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

Jasmine Smith, Esquire
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211
Jsmith@robinsongray.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 & Stublely
PO Box 11669
Columbia, SC 29211
ggallagher@speed-seta.com



Wanda Powell

April 10, 2024



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

April 10, 2024

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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
Condustrial, Inc.
Appellate Case No.: 2021-000633

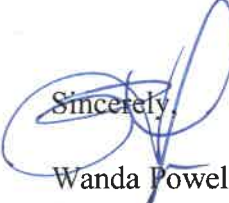
Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the **Motion for Extension to File Appellant-Respondents' Petition for Rehearing** 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 for Extension to File Appellant-Respondents' Petition for Rehearing** 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,


Wanda Powell
Paralegal to Stephen B. Samuels

/wp

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