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**Aug 01 2024**

**S.C. SUPREME COURT**

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

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Unpublished Opinion No. 2024-UP-110  
Heard February 6, 2024 – Filed March 27, 2024  
Withdrawn, Substituted, and Refiled July 3, 2024

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Rachel J. Turner, Employee, Petitioner,

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.

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**RESPONDENT'S MOTION FOR EXTENSION TO FILE CROSS PETITION FOR  
WRIT OF *CERTIORARI***

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Respondent Condustrial (“Respondent”) respectfully moves for an extension of time for filing its Petition for Writ of *Certiorari* based on the following grounds:

1. The deadline for the parties to file a Petition for a Writ of Certiorari to the Supreme Court following the Court of Appeals’ disposition of their respective Petitions for Rehearing is August 2, 2024;
2. Rachel Turner (“Petitioner”) filed her Writ on July 31, 2024;
3. Respondent respectfully requests an extension of time to file its Cross Petition until August 9, 2024;
4. This is Respondents’ first motion for an extension of time; AND
5. This motion is not being made for purposes of delaying a timely disposition of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "George D. Gallagher", followed by a horizontal line extending to the right.

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August 1, 2024