

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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**Aug 02 2024**

**S.C. SUPREME COURT**

Appeal from the South Carolina  
Workers' Compensation Commission

WCC File No. 1514359  
Appellate Case No. 2024-001255  
Unpublished Opinion No.: 2024-UP-110  
Filed March 27, 2024  
Withdrawn, Substituted, and Refiled July 3, 2024.

Rachel J. Turner, Employee, ..... Petitioner,

v.

Medustrial Healthcare Staffing Service and Condustrial  
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 Condustrial, Inc. f/k/a Medustrial Healthcare  
Staffing Service, Employer, is the.....Respondent.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME  
TO SERVE/FILE CROSS-PETITION FOR A WRIT OF CERTIORARI**

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*Attorneys for Respondents*

NOW COMES Respondents, the South Carolina Department of Corrections and State Accident Fund, by and through their undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's Order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for an extension of ten (10) days' time to file/serve their cross-petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

The Court of Appeals denied Respondents' timely petition for rehearing on July 3, 2024, making the deadline to file/serve a petition to this Court for a writ of certiorari today, Friday, August 2, 2024, pursuant to Rule 242(c), SCACR. Petitioner, Rachel Turner, filed her Writ on July 31, 2024.

Due to other time commitments, the undersigned counsel for Respondents requests ten (10) additional days, beyond today's date, to prepare Respondents' cross-petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits that there is good cause to allow the requested dispensation: in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014. Further, the Respondents' Motion is not being made for the purposes of any delay and it is the Respondents' first Motion for an extension of time.

WHEREFORE, Respondents respectfully request that this Honorable Court grant them an extension of ten (10) days' time to file /serve their petition for a writ of certiorari. With the extension requested herein, the new deadline for filing/serving the cross-petition for writ of

certiorari would be **Monday, August 12, 2024**, according to the undersigned's calculations. Further, Respondents respectfully request that the Court hold the present deadline in abeyance until it acts upon this Motion.

Respectfully submitted,



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August 2, 2024