

RECEIVED

Sep 04 2024

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Case No. 2024-001255

Opinion Number 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(Filed March 27, 2024, Withdrawn, Substituted, and Refiled July 3, 2024)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 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 Cross
Petitioner.

**RESPONDENTS SOUTH CAROLINA PROPERTY AND CASUALTY INSURANCE
GUARANTY ASSOCIATION ON BEHALF OF GUARANTEE INSURANCE
COMPANY AND COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC.'S
MOTION FOR EXTENSION OF TIME TO FILE
RETURN TO CONDUSTRUAL, INC.'S
CROSS PETITION FOR WRIT OF CERTIORARI**

Pursuant to Rules 242 and Rule 240 of the South Carolina Appellate Court Rules, the undersigned, as attorneys for the Respondents South Carolina Property and Casualty Insurance Guarantee Association on behalf of Guarantee Insurance Company and Countrywide Staffing Solutions Group, Inc herby move for a seven (7) day extension of time to file and serve a Return

to the Condustrual, Inc.'s Cross Petition for Writ of Certiorari filed in this matter on August 9, 2024.

The grounds for this motion are counsel for Respondents need additional time to respond to the arguments raised by Condustrual, Inc. Due to other deadlines and work obligations, the current deadline of September 9, 2024, to file the Return to the Cross Petition creates a difficult schedule for them to give this important matter the proper time and attention necessary.

With the requested 7-day extension, the Return to the Cross Petition for Writ of Certiorari would be due on or before September 16, 2024. This is Respondents' first request for an extension of this deadline.

Respectfully submitted,



Beth B. Richardson, SC Bar No. 69552
Grady Larry Beard, SC Bar No. 10190
Jasmine Denise Smith, SC Bar No. 100758
ROBINSON GRAY STEPP & LAFFITTE, LLC
Post Office Box 11449
Columbia, South Carolina 29211
(803) 929-1400

**Attorneys for Respondent South Carolina Property and
Casualty Insurance Guarantee Association on behalf of
Guarantee Insurance Company**

Gregory M. Alford
Alford Law Firm, LLC
18 Executive Park Road, Building 1 (29928)
Post Office Box 8008
Hilton Head Island, SC 29938
Phone: (843) 842-5500

**Attorney for Respondent Countrywide
Staffing Solutions Group, Inc**