



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

September 10, 2024

**RECEIVED**

**Sep 10 2024**

**S.C. SUPREME COURT**

The Honorable Patricia A. Howard  
Clerk of the South Carolina Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29201

RE: Rachel J. Turner v. Medustrial Healthcare Staffing Service and  
Condustrual, Inc.  
Appellate Case No.: 2024-001255

Dear Ms. Howard:

Attached please find our **Motion for Extension to file the Return to South Carolina Department of Corrections' Petition for Writ of Certiorari** along with our **Proof of Service** regarding the above referenced matter. We have also enclosed a check made payable to the South Carolina Supreme Court in the amount of \$50.00 for the filing fee.

By copy of this letter and attachments, we are serving defense counsel with a copy of the same as indicated by the attached **Proof of Service**.

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  
Edwin P. Martin, Esquire