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Dec 23 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

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WCC File No. 1514359

Appellate Case No. 2021-000633

Supreme Court Appellate Case No. 2024-001255

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Rachel J. Turner, Employee .....Appellant-Respondent,

v.

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

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**RESPONDENT COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC.,  
MOTION FOR COSTS ON APPEAL**

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Pursuant to Rule 222 and Rule 240, SCACR, Respondent by and through the undersigned  
counsel, Countrywide Staffing Solutions Group, Inc., hereby submits this motion for costs on  
appeal. For the reasons set forth below, the Court should grant this motion and award costs.

Appellant-Respondent Rachel Turner ("Turner") filed her Notice of Appeal of the South  
Carolina Workers' Compensation Commission Decision and Orders dated April 6, 2021, and May

17, 2021. Respondent-Appellant Condustrual, Inc. ("Condustrual") filed its Notice of Appeal of the same Orders on June 16, 2021. After full briefing and oral arguments, this Court issued an Unpublished Opinion on March 27, 2024. *See* No. 2024-UP-110. Turner and Condustrual filed Petitions for Writ with the Supreme Court of South Carolina. Those petitions have since been denied and the Court issued the remittitur to the lower court on December 11, 2024. Respondent hereby moves the Court for fees and costs as permitted by Rule 222, SCACR.

As required by subsection (d) of Rule 222, SCACR, this motion is "accompanied by a sworn itemized statement of costs incurred in the form prescribed by the Appendix to these rules." Per the enclosed sworn statement of itemized costs, Respondent is seeking \$2,642.88 in costs on appeal from Appellant Condustrual, Inc. f/k/a Medustrial Healthcare Staffing Service.

Respectfully submitted,

**ALFORD LAW FIRM**

By: s/Gregory M. Alford  
Gregory M. Alford (#6932)  
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Hilton Head Island, SC 29938  
(843) 842-5500  
**Attorneys for Respondent  
Countrywide Staffing Solutions  
Group, Inc.**

Dated this 23<sup>rd</sup> day of December 2024

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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.

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PROOF OF SERVICE

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I certify that I have served **Respondents Countrywide Staffing Solutions Group Incorporated's Motion for Costs on Appeal** on the following by electronically mailing a copy to counsel of record on **December 20, 2024**, at the addresses shown below:

The Honorable Amy Bracy Judicial Director  
S.C. Workers' Compensation Commission  
Post Office Box 1715 Columbia, SC 29202  
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Alford Law Firm

**Attorneys for Respondent  
Countrywide Staffing Solutions Group, Inc.**

December 23, 2024

# **ALFORD LAW FIRM, LLC**

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GREGORY M. ALFORD\*  
THOMAS E. WILLIAMS†

\*Also member Georgia Bar  
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(NOT FOR CONFIDENTIAL COMMUNICATIONS)

December 23, 2024

## **Via US Mail**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29901

**Re: Rachel Turner v. Medustrial Healthcare Staffing Service, et al.  
Case No. 2021-000633**

Dear Ms. Kitchings,

Enclosed please find a check in the amount of \$50.00 remitted as payment of the filing fee for Respondent Countrywide Staffing Solutions Group, Inc. for Costs on Appeal. The Motion was filed December 23, 2024.

With kindest regards, I am:

Sincerely,  
**ALFORD LAW FIRM, LLC**



Gregory M. Alford

Enclosures