

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1514359

Appellate Case No. 2021-000633

103581  
**RECEIVED**  
DEC 23 2024  
SC Court of Appeals

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

v.

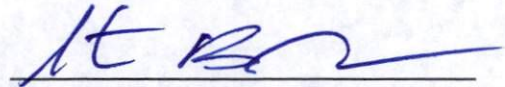
Medustrial Healthcare Staffing Service and Condustrail, Inc.;  
Guarantee Insurance Company; Countrywide Staffing Solutions  
Group, Inc.; South Carolina Department of Corrections; State  
Accident Fund; and South Carolina Uninsured Employer's Fund,..... Respondents

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

**MOTION FOR COSTS AND ATTORNEYS FEES**

Appellant-Respondent, by and through her undersigned attorney, hereby moves this  
Honorable Court for costs and attorney's fees in the amount of \$10,142.12 to be assessed against  
Respondent-Appellant pursuant to Rule 222, SCACR, and as shown by the attached itemized  
statement of costs. As grounds for this motion, Appellant-Respondent would show she is a  
prevailing party as this Court **reversed** the Worker's Compensation Commission on one of the two  
issues she appealed and **affirmed** on all issues appealed by Condustrail, Inc. f/k/a Medustrial  
Healthcare Staffing Service.

Respectfully submitted,



Stephen B. Samuels, SC Bar No. 15394  
SAMUELS REYNOLDS LAW FIRM, LLC  
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Attorney for Appellant-Respondent

Columbia, South Carolina  
December 23, 2024

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Commissioners T. Scott Beck, R. Michael Campbell, II, and Gene McCaskill

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

v.

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

**PROOF OF SERVICE**

I certify that I, Wanda Powell, Paralegal for the Samuels Reynolds Law Firm  
have caused the **Motion for Costs and Attorneys Fees** to be served on the parties  
below clearly marked on the date indicated below, addressed as follows:

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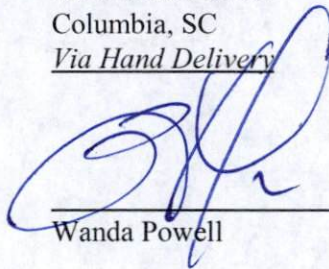
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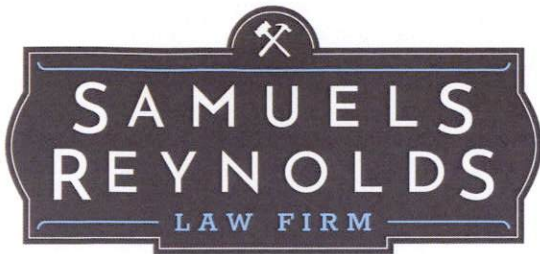
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The Honorable Jenny Abbott Kitchings  
Clerk of the SC Court of Appeals  
1220 Senate Street  
Columbia, SC  
Via Hand Delivery



Wanda Powell

December 23, 2024



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

December 23, 2024

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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RE: Rachel J. Turner v. Medustrial Healthcare Staffing and Condustrial, Inc.  
Appellate Case No.: 2021-000633

Dear Ms. Kitchings:

Enclosed for filing please find our **Motion for Costs and Attorneys Fees** in the above-referenced appeal. I have also attached our firm's check in the amount of Fifty (\$50.00) Dollars as payment of the required filing fee. Please have your staff date stamp an extra copy of the Motion, and return a clocked copy to our courier.

By copy of this letter and enclosure to counsels of record, we are serving them with a copy of our **Motion for Costs and Attorneys Fees** as indicated by the attached Proof of Service.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your consideration.

With kindest regards, I am

Respectfully,

Wanda Powell  
Paralegal to Stephen B. Samuels

/wp  
Enclosure(s) as stated

cc: Erin Farthing, Esquire  
Gregory M. Alford, Esquire  
Lisa C. Glover, Esquire  
Jasmine Smith, Esquire  
Beth Richardson, Esquire  
Grady L. Beard, Esquire  
James P. Newman, Jr., Esquire  
George D. Gallagher, Esquire  
Edwin P. Martin, Jr., Esquire