

RECEIVED

Jun 15 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

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

WCC File No. 1514359

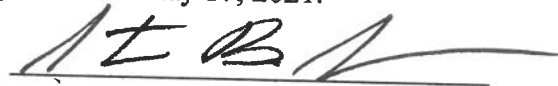
Rachel J. Turner, Claimant, Appellant,

v.

Medustrial Healthcare Staffing Service and Condustral, Inc.;
South Carolina Property and Casualty Guaranty Association
on behalf of the Guarantee Insurance Company; Countrywide
Staffing Solutions Group, Inc.; South Carolina Department of
Corrections; State Accident Fund; and South Carolina
Uninsured Employer's Fund, Respondents.

NOTICE OF APPEAL

Rachel Turner appeals the Decision and Orders of the Appellate Panel of the South Carolina
Workers' Compensation Commission dated April 6, 2021 and May 17, 2021.



Stephen B. Samuels
SAMUELS REYNOLDS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000
Stephen@SamuelsReynolds.com

ATTORNEY FOR APPELLANT

June 15, 2021
Columbia, South Carolina

Other Counsel of Record:

T. Jeff Goodwyn, Esquire
GOODWYN LAW FIRM LLC
2309 Devine Street
Columbia, SC 29205
803-251-4517
JGOODWYN@goodwynlaw.com

George D. Gallagher, Esquire
SPEED, SETA, MARTIN, TRIVETT & STUBLEY
PO Box 11669
Columbia, SC 29211
ggallagher@speed-seta.com
ATTORNEYS FOR MEDUSTRIAL HEALTHCARE
STAFFING SERVICE AND CONDUSTRIAL, INC.

Beth Burke Richardson, Esquire
Grady L. Beard, Esquire
ROBINSON GRAY STEPP & LAFFITTE, LLC
PO Box 11449
Columbia, SC 29211
(803) 929-1400
gbeard@robinsongray.com
ATTORNEYS FOR SOUTH CAROLINA PROPERTY
AND CASUALTY INSURANCE GUARANTY
ASSOCIATION ON BEHALF OF GUARANTEE
INSURANCE

Gregory M. Alford, Esquire
ALFORD LAW FIRM, LLC
PO Drawer 8008
Hilton Head Island, SC 29938
(843) 842-5500
gregg@Alfordlawsc.com

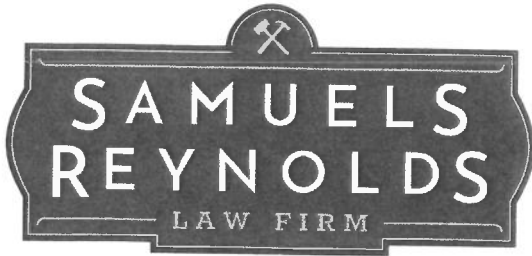
James P. Newman, Jr., Esquire
HOWSER, NEWMAN, BESLEY, LLC
PO Box 12009
Columbia, SC 29211
(803)758-6000
jnewman@hnblaw.com
ATTORNEYS FOR COUNTRYWIDE STAFFING
SOLUTIONS GROUP, INC.

Erin Farthing, Esquire
STATE ACCIDENT FUND
PO Box 1166
Lexington, SC 29071
(803) 896-5800
efarthing@saf.sc.gov
ATTORNEY FOR SOUTH CAROLINA
DEPARTMENT OF CORRECTIONS AND STATE
ACCIDENT FUND

Lisa C. Glover, Esquire
SC UNINSURED EMPLOYERS' FUND
PO Box 1815
Lexington, SC 29071
(803) 896-5800
lglover@saf.sc.gov
ATTORNEY FOR SOUTH CAROLINA UNINSURED
EMPLOYERS' FUND

Also Served:

Ms. Amy Bracy
Judicial Director
SOUTH CAROLINA WORKERS' COMPENSATION
COMMISSION
1333 Main Street, Suite 500
Columbia, SC 29201



STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

June 15, 2021

RECEIVED

Jun 15 2021

SC Court of Appeals

Via Email Contact@CreelReporting.com
Creel Court Reporting
1230 Richland Street
Columbia, SC 29201

RE: Rachel J. Turner v. Medustrial Healthcare Staffing and Condustrial, Inc.
WCC File No.: 1514359

Dear Sir or Madam:

On November 10, 2010, the above case was heard before the Appellate Panel of the SC Workers' Compensation Commission in Columbia, SC. The Commission indicated that Amber Scarborough with Creel Court Reporting was the court reporter for this hearing.

I request that you provide me with a transcript of the proceedings. Please transcribe the entire record. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Sincerely,

A handwritten signature in black ink, appearing to read "W Powell", written over a light blue circular stamp.

Wanda Powell
Paralegal to Stephen B. Samuels

/wp

cc: Erin Farthing, Esquire
James P. Newman, Jr., Esquire
Lisa C. Glover, Esquire
Grady L. Beard, Esquire
Gregory M. Alford, Esquire
George D. Gallagher, Esquire
Beth Richardson, Esquire
T. Jeff Goodwyn, Esquire
Amy Bracy, Judicial Director for SCWCC
Clerk, Court of Appeals

WE WORK FOR THE PEOPLE WHO WORK

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSREYNOLDS.COM

RECEIVED

Jun 15 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 1514359

Rachel J. Turner, Claimant, Appellant,

v.

Medustrial Healthcare Staffing Service and Condustrual, Inc.;
South Carolina Property and Casualty Guaranty Association
on behalf of the Guarantee Insurance Company; Countrywide
Staffing Solutions Group, Inc.; South Carolina Department of
Corrections; State Accident Fund; and South Carolina
Uninsured Employer's Fund, Respondents.

PROOF OF SERVICE

I certify that I, Wanda Powell, paralegal for the Samuels Reynolds Law Firm, LLC, have served the **Notice of Appeal** upon counsel for the Respondents and the South Carolina Workers' Compensation Commission by depositing a copy of it in the United States Mail, postage prepaid, on June 15, 2021, addressed as follows:

Erin Farthing, Esquire
State Accident Fund
PO Box 1166
Lexington, SC 29071
efarthing@saf.sc.gov

Gregory M. Alford, Esquire
PO Drawer 8008
Hilton Head Island, SC 29938
gregg@Alfordlawsc.com

Lisa C. Glover, Esquire
SC Uninsured Employers' Fund
PO Box 1815
Lexington, SC 29071
lglover@saf.sc.gov

T. Jeff Goodwyn, Esquire
2309 Devine Street
Columbia, SC 29205
JGOODWYN@goodwynlaw.com

Grady L. Beard, Esquire
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211
gbeard@robinsongray.com

Beth Richardson, Esquire
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211
brichardson@robinsongray.com

James P. Newman, Jr., Esquire
Howser, Newman, Besley, LLC
PO Box 12009
Columbia, SC 29211
jnewman@hnblaw.com

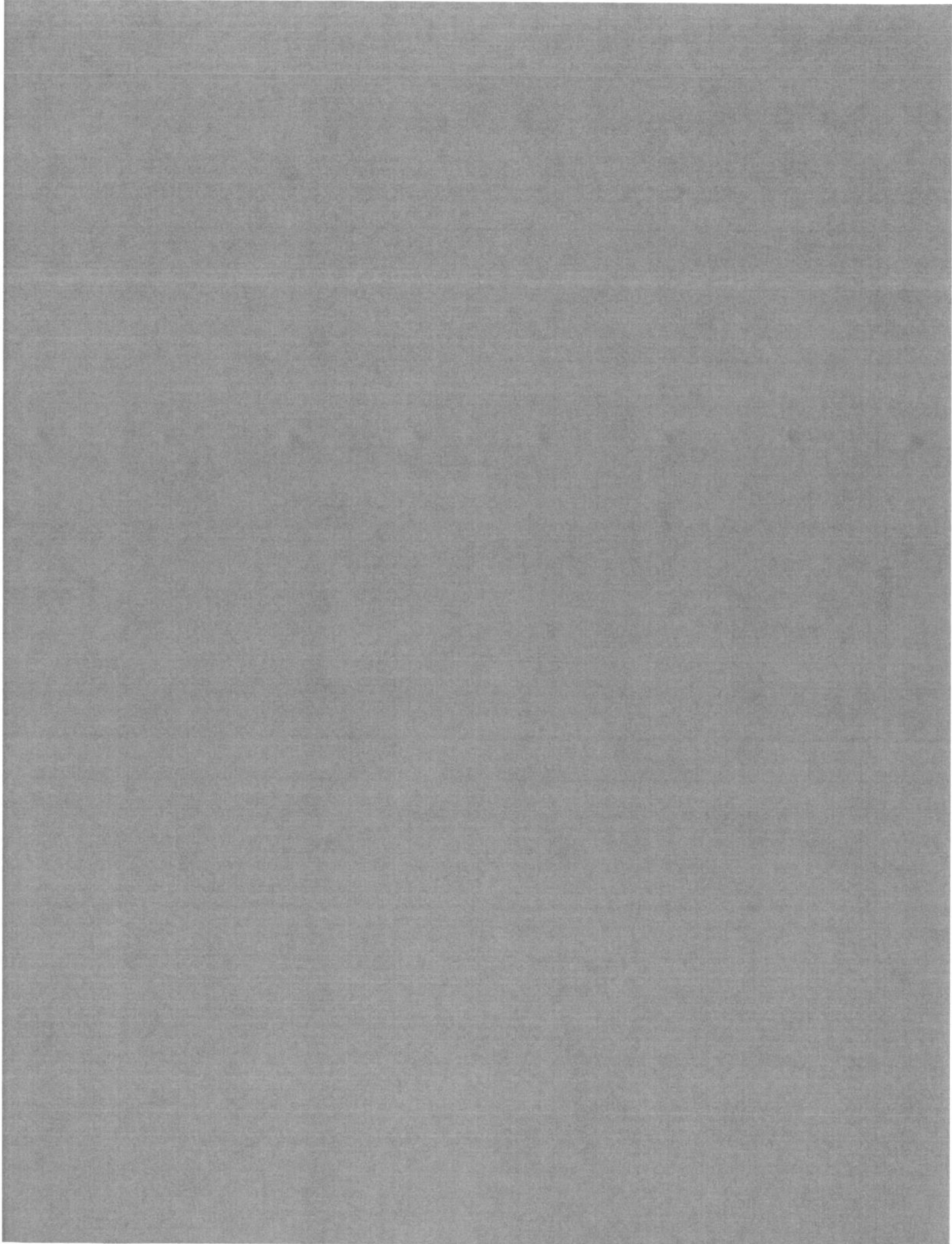
George D. Gallagher, Esquire
Speed, Seta, Martin, Trivett & Stubley
PO Box 11669
Columbia, SC 29211
ggallagher@speed-seta.com

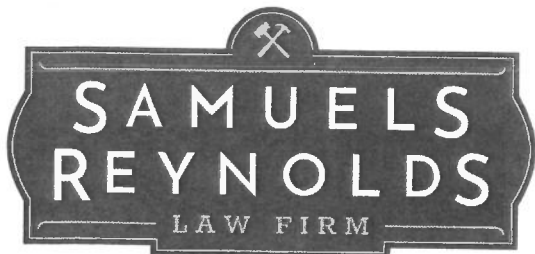
Amy Bracy, Judicial Director
SC Workers' Compensation Comm.
Post Office Box 1715
Columbia, SC 29202-1715

June 15, 2021

A handwritten signature in black ink, appearing to read 'Wanda Powell', written over a horizontal line.

Wanda Powell
SAMUELS REYNOLDS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000





STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

June 15, 2021

RECEIVED

Jun 15 2021

SC Court of Appeals

Via email: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Rachel J. Turner v. Medustrial Healthcare Staffing Service and Condustrual, Inc.
WCC File No.: 1514359

Dear Ms. Kitchings:

Enclosed for filing is a **Notice of Appeal** in the above case. Also enclosed are the following:

1. Proof of service of the Notice of Appeal on the Respondents;
2. A copy of the orders which are to be challenged on appeal;
3. A filing fee of \$250.00 for the Appeal;
4. A copy of our letter to the Court Reporter requesting the transcript and confirming that we agree to pay the per page charge as provided by Rule 607, SCACR.

Please have your staff clock in the copy of the above and return the clocked copy with our courier.

Respectfully,

Wanda Powell

Paralegal for Stephen B. Samuels

/wp

Enclosure(s) as stated

cc: Erin Farthing, Esquire
James P. Newman, Jr., Esquire
Lisa C. Glover, Esquire
Grady L. Beard, Esquire
Gregory M. Alford, Esquire
George D. Gallagher, Esquire
Beth Richardson, Esquire
T. Jeff Goodwyn, Esquire
Amy Bracy, Judicial Director for SCWCC

WE WORK FOR THE PEOPLE WHO WORK

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSREYNOLDS.COM