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Jul 20 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  
Appellate Case No. 2021-000633

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

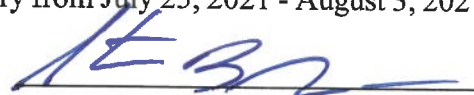
v.

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 Respondent-Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF APPELLANT-RESPONDENT**

Appellant-Respondent, by and through her undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file the **Initial Brief of Appellant-Respondent**. The Brief is currently due on July 21, 2021. If the Motion is granted, the due date will be extended to August 20, 2021. As grounds for granting this Motion, Appellant-Respondent would show additional time is needed as counsel will be out of the country from July 25, 2021 - August 3, 2021.



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Attorney for Appellant-Respondent

July 20, 2021

Columbia, South Carolina

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v.

Medustrial Healthcare Staffing Service and Condustrual, Inc.;  
Guarantee Insurance Company; Countrywide Staffing Solutions  
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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.

**PROOF OF SERVICE**

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I certify that I, Wanda Powell, Paralegal to Stephen B. Samuels have caused  
the **Motion for Extension of Time to File the Initial Brief of Appellant-  
Respondent** to be served on the parties below, via electronic service addressed as  
follows:

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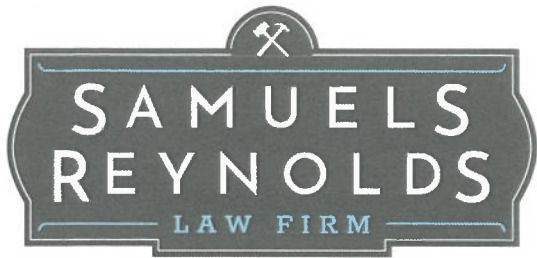
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Wanda Powell, Paralegal

July 20, 2021



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

July 20, 2021

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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**SC Court of Appeals**

RE: Rachel J. Turner v. Medustrial Healthcare  
Appellate Case No. 2021-000633

Dear Ms. Kitchings:

Enclosed for filing please find Appellant-Respondent's **Motion for Extension of Time to File the Initial Brief of Appellant-Respondent** regarding the above referenced matter.

If you would kindly have your staff file the **Motion for Extension of Time to File the Initial Brief of Appellant-Respondent** and **Proof of Service** and return a clocked copy to me.

Respectfully,

A handwritten signature in blue ink, appearing to read "SBS", is written over a blue horizontal line.

Stephen B. Samuels

SBS/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

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