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Jul 21 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Case Number 2021-000633

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.

Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter

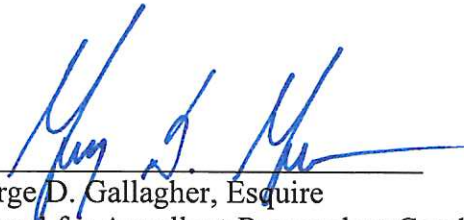
George D. Gallagher, Esquire
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P.O. Box 11669
Columbia, SC 29211
(803) 748-2919
Attorney for Respondents

RESPONDENT-APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER IS BASED ON THE FOLLOWING GROUNDS:

1. Respondent-Appellant Condustrial, Inc. f/k/a Medustrial Healthcare Staffing's ("Condustrial") Initial Brief is docketed for submission on or before July 21, 2021;
2. Counsel for Condustrial requests an extension of time to file the Appellant's Initial Brief and Designation of Matter until August 20, 2021;
3. This is Condustrial's first motion for an extension of time with respect to filing the Appellant's Initial Brief and Designation of Matter; AND
4. This motion is not being made for purposes of delay; rather, to allow time for the Court to rule on Appellant-Respondent Rachel J. Turner's Motion for Partial Remand to the Commission filed on July 13, 2021. Condustrial's Return to such Motion is due on July 23, 2021. Condustrial submits that the Court's action on the Motion may ultimately affect that nature of the case and issues on Appeal that will need to be briefed.

Accordingly, Respondents request an extension of time until August 20, 2021 to file and serve their Appellant's Initial Brief and Designation of Matter.

Respectfully Submitted,



George D. Gallagher, Esquire
Counsel for Appellant-Respondent Condustrial, Inc.
f/k/a Medustrial Healthcare Staffing
S.C. Bar # 12149

Columbia, SC
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PROOF OF SERVICE

STATE OF SOUTH CAROLINA
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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.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Respondent-Appellant Condustrual, Inc.'s Initial Brief and Designation of Matter by electronic mail and/or by depositing a copy of it in the United States Mail, postage prepaid, on July 21, 2021, addressed to all attorneys of record at the addresses below:

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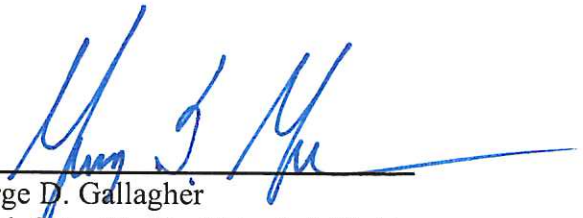
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July 21, 2021



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July 21, 2021

VIA EMAIL: CTAPPFILINGS@SCCOURTS.ORG

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Rachel Turner v. SC Department of Corrections – Kirkland, et al*
Appellate Case No.: 2021-000633
WCC No.: 1514359
DOA: 9/5/2015
Our File No.: 8400-0101

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GEORGE D. GALLAGHER (SC), of counsel

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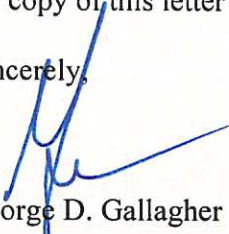
SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed our Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter in the above-referenced matter.

By copy of this letter to all counsel of the involved parties, I am serving them with the Motion.

Sincerely,


George D. Gallagher

GDG/kgl

Enclosures

cc: The Hon. Amy Bracy
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Lisa C. Glover, Esq.
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