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Aug 16 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

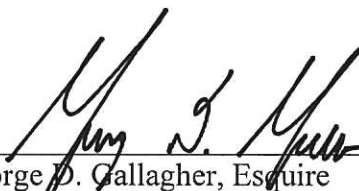
George D. Gallagher, Esquire
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Attorney for Respondents

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 Condustrual, Inc. f/k/a Medustrial Healthcare Staffing's ("Condustrual") Initial Brief is docketed for submission on or before August 20, 2021;
2. Counsel for Condustrual requests an extension of time to file its Initial Appellants Brief and Designation of Matter;
3. This motion is not being made for purposes of delay; rather, its purpose is to allow time for the Court to rule on Appellant-Respondent Rachel J. Turner's ("Turner") Motion for Partial Remand to the Commission filed on July 13, 2021.¹ Condustrual submits that the Court's action on Turner's Motion may ultimately affect issues on Appeal that will need to be briefed if the Motion is denied, and possibly stay further appellate proceedings altogether if the Motion to Remand is granted; AND
4. Condustrual notes that Turner argued in her Motion for Partial Remand that briefing should be deferred until a disposition of the Motion has been rendered. *See Turner's Motion* p. 2. To that extent, Turner also joins in Condustrual's current Motion for Extension.

For these reasons, Condustrual respectfully requests an extension of time to file and serve Initial Briefs and Designation of Matter from Condustrual and Turner until at least thirty (30) days after disposition of Turner's Motion.

Respectfully Submitted,



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

Columbia, SC
August 16, 2021

¹ Condustrual filed its Return to the Turner's Motion on July 23, 2021.

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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 August 16, 2021, addressed to all attorneys of record at the addresses below:

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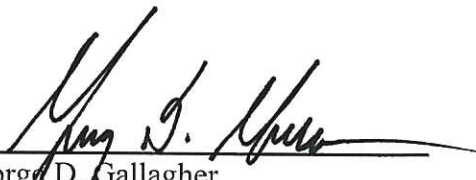
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August 16, 2021


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August 16, 2021

∞
GEORGE D. GALLAGHER (SC), of counsel

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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Dear Ms. Kitchings:

Please find enclosed Respondent-Appellant Condustrial's Motion for Extension 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/kgf

Enclosures

cc: The Hon. Amy Bracy
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