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Aug 19 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.

**SECOND 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 August 20, 2021. If the Motion is granted, the due date will be extended to September 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 September 4 - September 13, 2021.



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stephen@samuelsreynolds.com
Attorney for Appellant-Respondent

August 19, 2021

Columbia, South Carolina

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Service, Employer, is the Respondent-Appellant.

PROOF OF SERVICE

I certify that I, Wanda Powell, Paralegal to Stephen B. Samuels have caused
the **Second 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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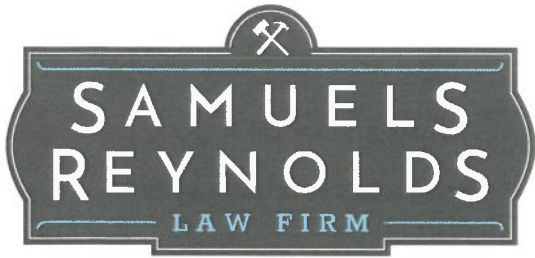
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Wanda Powell, Paralegal

August 19, 2021



STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

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SC Court of Appeals

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

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

Dear Ms. Kitchings:

Enclosed for filing please find Appellant-Respondent's **Second 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 **Second 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 be "SBS", written over a light 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
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