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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 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 Appellant's Initial Brief and Designation of Matter

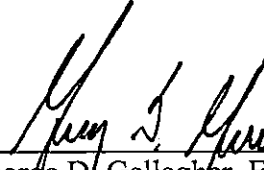
George D. Gallagher, Esquire
Speed, Seta, Martin, Trivett & Stublely, LLC
P.O. Box 11669
Columbia, SC 29211
(803) 748-2919
Attorney for Respondents

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 Condustrual, Inc. f/k/a Medustrial Healthcare Staffing's ("Condustrual") Initial Brief and Designation of Matter to be included in the Record on Appeal was docketed for submission on or before November 29, 2021, which is immediately following the Thanksgiving holiday and counsel's travels;
2. Counsel for Condustrual respectfully requests a brief extension of time to file its Initial Brief and Designation of Matter to avoid any further conflicts with holiday engagements;
3. This motion is not being made for purposes of delay.

For these reasons, Condustrual respectfully requests an extension of time to file and serve its Initial Brief and Designation of Matter for fifteen (15) days.

Respectfully Submitted,



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

Columbia, SC
November 29, 2021

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PROOF OF SERVICE

STATE OF SOUTH CAROLINA
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of which Condustral, 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 Condustral, 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 November 29, 2021, addressed to all attorneys of record at the addresses below:

The Honorable Amy Bracy
Judicial Director
S.C. Workers' Compensation
Commission
Post Office Box 1715
Columbia, SC 29202
judicial@wcc.sc.gov

Erin Farthing, Esq.
State Accident Fund

PO Box 1166
Lexington, SC 29071
EFarthing@saf.sc.gov

Gregory M. Alford, Esq.
Attorney at Law
PO Drawer 8008
HILTON HEAD
ISLAND, SC 29938
gregg@alfordlawsc.com

Lisa C. Glover, Esq.
SC Uninsured Employers' Fund
P:O Box 1815
Lexington, SC 29071
lglover@saf.sc.gov

T. Jeff Goodwyn Jr., Esq.
Attorney at Law
2309 Devine Street
COLUMBIA, SC 29205
jgoodwyn@goodwynlaw.com

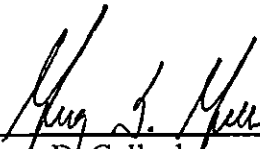
Beth Richardson, Esq.
Robinson Gray Stepp & Laffitte,
LLC
PO Box 11449
Columbia, SC 29211
brichardson@sowellgray.com

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

James P. Newman, Jr., Esq.
Howser, Newman & Besley, LLC
P O Box 12009
Columbia, SC 29211
jnewman@hnblaw.com

Stephen B. Samuels, Esq.
Samuels Reynolds Law Firm
1320 Richland Street
Columbia, SC 29201
stephen@samuelsreynolds.com

November 29, 2021


George D. Gallagher
Speed, Seta, Martin, Trivett & Stubley
Bar No. 12149
Post Office Box 11669
Columbia, South Carolina 29211
Attorney for Appellant-Respondent
Condustral, Inc.

SPEED, SETA, MARTIN, TRIVETT & STUBLEY, LLC
ATTORNEYS AT LAW

WALLACE SPEED (1940-2020)
LESLI R. SETA (GA & FL)
SETH C. MARTIN (GA & FL)
ERIC L. TRIVETT (GA)
M. STEPHEN STUBLEY (SC)
STEPHANIE A. ROCKWELL (GA & TN)
JAMES E.L. FICKLING (SC & NC)
ANDREA S. OWEN (GA)
HUNTER CHANDLER (GA & TN)

REPLY TO
P.O. BOX 11669
COLUMBIA, SOUTH CAROLINA 29211
PHONE (803) 748-2919
FAX (803) 748-2735
www.Speed-Seta.com

ALEXANDER ADKINS (GA & TN)
ANDYNE B. ANDERSON (GA)
SCOTT H. ANDREWS (GA)
MELISSA CRUZ (GA & TN)
JEREMY T. ENGLAND (AL & MS)
C. BENTON HILBURN (GA)
SARA P. MORRIS (SC & NC)
CALEY A. PITTS (GA)
KELSIE L. QUEEN (SC & NC)
JENNIFER S. RAY (GA)
SARAH V. SNIPES (GA)
LINDSEY R. STEWART (GA)
MATTHEW W. STRUBLE (GA)
MARK M. STUBLEY, JR. (AL, NC & SC)
BRIGGS P. TUCKER (SC)
BRITTANY BELL TURNER (GA & FL)
LILY D. WILKERSON (GA & FL)

November 29, 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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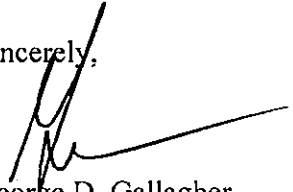
SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed Respondent-Appellant Condustrial's Motion for Extension in the above-referenced matter. Our firm's check in the amount of \$50.00 for the filing fee has been placed in the mail to your office.

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

Sincerely,


George D. Gallagher

GDG/kgl

Enclosures

cc: The Hon. Amy Bracy
Stephen B. Samuels, Esq.
Erin Farthing, Esq.
Gregory M. Alford, Esq.
Lisa C. Glover, Esq.

T. Jeff Goodwyn Jr., Esq.
Beth Richardson, Esq.
Grady L. Beard, Esq.
James P. Newman, Jr., Esq.
Tom Sears, Esq.

SPEED, SETA, MARTIN, TRIVETT & STUBLEY, LLC

ATTORNEYS AT LAW

P.O. BOX 11669
COLUMBIA, SOUTH CAROLINA 29211

FIRST-CLASS



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Clerk, South Carolina Court of Appeals
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Columbia, SC 29211

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