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Nov 29 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 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

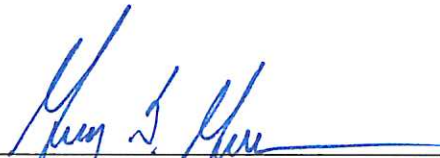
George D. Gallagher, Esquire
Speed, Seta, Martin, Trivett & Stublely, LLC
P.O. Box 11669
Columbia, SC 29211
(803) 748-2919
Attorney for Respondents

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 Condustrial, Inc. f/k/a Medustrial Healthcare Staffing's ("Condustrial") 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 Condustrial 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, Condustrial 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 Condustrial, Inc.
f/k/a Medustrial Healthcare Staffing
S.C. Bar # 12149

Columbia, SC
November 29, 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 November 29, 2021, addressed to all attorneys of record at the addresses below:

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Judicial Director
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November 29, 2021


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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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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/kgf

Enclosures

cc: The Hon. Amy Bracy
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Erin Farthing, Esq.
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T. Jeff Goodwyn Jr., Esq.
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