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**Dec 29 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

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Appellate Case Number 2021-000633

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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.

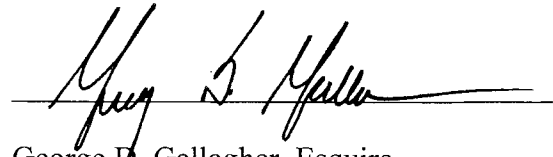
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**RESPONDENT CONDUSTRUAL'S DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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Respondent proposes the following be included in the Record on Appeal:

1. GIC's APA #24
2. Service Agreement Between Countrywide and Condustrual
3. Condustrual Motion to Reconsider
4. Commission Order Denying Motion dated September 20, 2021.
5. Independent Contractor Agreement between Claimant and Condustrual [Claimant's Exhibit D pp. 233-237]
6. Condustrual Agreement with SCDC [Claimant's Exhibit G pp. 253-259]
7. Condustrual Agreement with Countrywide [Exhibit F pp. 243-252]
8. Claimant's APA pp. 20-28
9. Light duty employment offer letter [Condustrual APA p. 330]
10. Condustrual logs of communications with Turner [Condustrual APA pp. 31-33]
11. Turner's entire 2014 Tax Return with Schedule C
12. Hearing Testimony of Tony Durham [H.T. pp. 138-140]
13. Hearing Testimony of Tom Sears [H.T. pp. 191-194]

A handwritten signature in black ink, appearing to read "George D. Gallagher", is written over a horizontal line.

George D. Gallagher, Esquire

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of which Condustrual, Inc. f/k/a Medustrial Healthcare Staffing Service, Employer, is the Respondent-Appellant.

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**PROOF OF SERVICE**

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I certify that I have served the Initial Brief of Respondent and Designation of Matter by electronic mail and/or by depositing a copy of it in the United States Mail, postage prepaid, on December 29, 2021, addressed to all attorneys of record at the addresses below:

The Honorable Amy Bracy  
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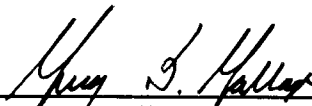
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December 29, 2021

  
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December 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*

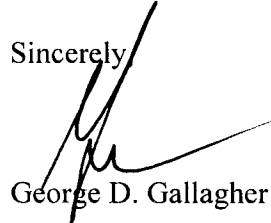
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Dear Ms. Kitchings:

Please find enclosed Respondent-Appellant Condustrial's Initial Respondent's Brief in the above-referenced matter.

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

Sincerely,

  
George D. Gallagher

GDG/kgI

Enclosures

cc: The Hon. Amy Bracy  
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