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Dec 29 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC File No. 1514359

Court of Appeals 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.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF
AND DESIGNATION OF MATTER ON APPEAL**

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Respondent
Guarantee Insurance Company moves this Court for an order granting an extension of time for
Respondent to serve and file Respondent's Initial Brief to Appellant Rachel J. Turner's Initial Brief
of Appellant and Designation of Matter in the above-captioned action. Currently Respondent's
Initial Brief and Designation of Matter are due on or about Wednesday, December 29, 2021. The
undersigned Respondent requests an extension of time of one (1) month to file and serve
Respondent's Initial Brief and Designation of Matter, as it needs additional time to respond to the

arguments raised by the Appellant and due to other deadlines and work obligations. The new deadline for Respondent's Initial Brief and Designation of Matter will be January 31, 2022.

Additionally, the undersigned Respondent requests that all filing/service deadlines be held in abeyance pending the Court's ruling on this motion.

WE SO MOVE:

ROBINSON GRAY STEPP & LAFFITTE, LLC

By:  _____

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Attorneys for Respondent

Columbia, South Carolina
December 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 caused the **Motion for Extension of Time to File Respondent's Brief
and Designation of Matter on Appeal** to be served on all attorneys of record by electronic mail
on December 29, 2021 at the following addresses:

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December 29, 2021