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Jan 12 2022

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.

MOTION FOR EXTENSION OF TIME TO FILE
INITIAL REPLY 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 Reply Brief of Appellant-Respondent**. Counsel was served with the Initial Brief of Respondent-Appellant on January 4, 2022. The Reply Brief is currently due on January 14, 2022. If the Motion is granted, the due date will be extended to February 13, 2022. As grounds for granting this Motion, Appellant-Respondent would show additional time is needed as counsel was under quarantine due to Covid-19 until January 9, 2022. Additionally, this is a complicated case with multiple issues requiring extensive briefing along with a large record from eight days of trial.



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Attorney for Appellant-Respondent

January 12, 2022

Columbia, South Carolina

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Accident Fund; and South Carolina Uninsured Employer's Fund,. . . Respondents

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

PROOF OF SERVICE

I certify that I, Christina Bell, Paralegal to Stephen B. Samuels have caused the **Motion for Extension of Time to File the Initial Reply Brief of Appellant-Respondent** to be served on the parties below, via electronic service addressed as follows:

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Christina Bell, Paralegal

January 12, 2022



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 **Motion for Extension of Time to File the Initial Reply Brief of Appellant-Respondent** regarding the above referenced matter.

If you would kindly have your staff file the **Motion for Extension of Time to File the Initial Reply Brief of Appellant-Respondent** and **Proof of Service** and return a clocked copy to me.

Respectfully,

Stephen B. Samuels
Attorney for Appellant-Respondent

SBS/cb
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
George D. Gallagher, Esquire
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