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Jan 13 2022

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 TO RESPONDENT-APPELLANT  
CONDUSTRIAL'S INITIAL BRIEF OF APPELLANT AND DESIGNATION OF  
MATTER**

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 Condustrual, Inc. f/k/a  
Medustrial Healthcare Staffing Service, Employer's Initial Brief and Designation of Matter in the  
above-captioned action. Currently Respondent's Initial Brief and Designation of Matter are due  
on or about Thursday, February 3, 2022. 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 March 3, 2022. This is Respondent's first request for an extension to file and serve Respondent's Initial Brief.<sup>1</sup>

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: 

Grady L. Beard, Esquire  
Beth B. Richardson, Esquire  
1310 Gadsden Street (29201)  
Post Office Box 11449  
Columbia, South Carolina 29211  
(803) 929-1400

Attorneys for Respondent

Columbia, South Carolina  
January 13, 2022

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<sup>1</sup> Respondent Guarantee Insurance Company previously requested 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. The Court granted the Motion on January 7, 2022, and extended the time to answer through and until February 3, 2022.

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

**PROOF OF SERVICE**

Pursuant to Rule 262(c)(3), SCACR, I certify that I have caused the **Respondent  
Guarantee Insurance Company's Motion for Extension of Time to File Respondent's Brief  
and Designation of Matter on Appeal to Respondent-Appellant Condustrual's Initial Brief of  
Appellant and Designation of Matter** to be served on the following counsel of record by AIS  
email.

Stephen B. Samuels, Esquire  
Samuels Reynolds Law Firm, LLC  
1320 Richland Street  
Columbia, SC 29201

[stephen@samuelsreynolds.com](mailto:stephen@samuelsreynolds.com)

*Attorneys for Appellant-Respondent Rachel  
J. Turner*

T. Jeff Goodwyn, Esquire  
2309 Devine Street  
Columbia, SC 29205  
[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)

George D. Gallagher, Esquire  
Speed, Seta, Martin, Trivett & Stublely  
PO Box 11669  
Columbia, SC 29211  
[ggallagher@speed-seta.com](mailto:ggallagher@speed-seta.com)  
*Attorneys for Respondent-Appellant  
Condustrial, Inc.*

Gregory M. Alford, Esquire  
PO Drawer 8008  
Hilton Head Island, SC 29938

[gregg@alfordlawsc.com](mailto:gregg@alfordlawsc.com)

*Attorneys for Respondent Countrywide  
Staffing Solutions Group, Inc.*

Erin Farthing, Esquire  
State Accident Fund  
PO Box 1166 Lexington, SC 29071  
[efarthing@saf.sc.gov](mailto:efarthing@saf.sc.gov)

*Attorneys for Respondents SC Department  
of Corrections State Accident Fund*

James P. Newman, Jr., Esquire  
Howser, Newman, Besley, LLC  
PO Box 12009  
Columbia, SC 29211

[jnewman@hnblaw.com](mailto:jnewman@hnblaw.com)

*Attorneys for Respondent Countrywide  
Staffing Solutions Group, Inc.*

Lisa C. Glover, Esquire  
SC Uninsured Employers' Fund  
PO Box 1815  
Lexington, SC 29071

[lglover@saf.sc.gov](mailto:lglover@saf.sc.gov)

*Attorneys for Respondent South Carolina  
Uninsured Employers' Fund*

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: s/Beth B. Richardson

Grady L. Beard, Esquire  
Beth B. Richardson, Esquire  
1310 Gadsden Street (29201)  
Post Office Box 11449  
Columbia, South Carolina 29211  
(803) 929-1400

*Attorneys for Respondent Guarantee  
Insurance Company*

Columbia, South Carolina  
January 13, 2022

**From:** [Cynthia D. Nygord](#)  
**To:** [ggallagher@speed-seta.com](mailto:ggallagher@speed-seta.com); [stephen@samuelsreynolds.com](mailto:stephen@samuelsreynolds.com); [jnewman@hnblaw.com](mailto:jnewman@hnblaw.com); [lglover@saf.sc.gov](mailto:lglover@saf.sc.gov); [jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com); [gregg@alfordlawsc.com](mailto:gregg@alfordlawsc.com); [efarthing@saf.SC.gov](mailto:efarthing@saf.SC.gov); [gcampbell@hnblaw.com](mailto:gcampbell@hnblaw.com); [farthingef@gmail.com](mailto:farthingef@gmail.com); [wanda@samuelsreynolds.com](mailto:wanda@samuelsreynolds.com)  
**Cc:** [Beth B. Richardson](#); [Jasmine D. Smith](#); [Cynthia D. Nygord](#); [Dara Carmichael](#); [Grady Beard](#); [Mimi Waymer](#); [Cindy Lamb](#); [{F59158}.Clients@f8eed.imatech.work](mailto:{F59158}.Clients@f8eed.imatech.work)  
**Subject:** 2021-000633 - Turner v. Medustrial Healthcare, et al - Motion for Extension [IMAN-CLIENTS.FID59158]  
**Date:** Thursday, January 13, 2022 2:21:21 PM  
**Attachments:** [image002.png](#)  
[image004.png](#)  
[Gaurantee's Motion for Extension of Time to File Respondent's Brief and DOM to Rsp App Condustrial.pdf](#)  
[Proof of Service.pdf](#)

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Dear Counselors,

Pursuant to Rule 262(c)(3), SCACR, attached for service upon you via email is Respondent Guarantee Insurance's Motion for Extension of Time to File Respondent's Brief and Designation of Matter on Appeal to Respondent-Appellant Condustrial's Initial Brief of Appellant and Designation of Matter, as well as a Proof of Service for the same, which is being filed in the South Carolina Court of Appeals this afternoon.

Should you have any questions or concerns, please don't hesitate to contact us. Thanks and have a great afternoon.

With kindest regards,

Cyndi Nygord



**CYNDI NYGORD** PARALEGAL

DIRECT 803.231.7845

**VCARD**

**ROBINSONGRAY.COM**

1310 Gadsden Street

PO Box 11449 (29211)

Columbia, SC 29201



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