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STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

February 18, 2022

RECEIVED

FEB 22 2022

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 Staffing Service and Condustrual, Inc.
Appellate Case No. 2021-000633

Dear Ms. Kitchings:

Enclosed for filing please find our **Amended Motion for Leave to File Initial Respondents' Brief and Designation of Matter of Appellant-Respondent Out of Time and Proof of Service** regarding the above referenced matter. We have also enclosed our check payable to South Carolina Court of Appeals in the amount of \$50.00 as payment of the filing fee.

Please note we are filing an amended motion because we inadvertently referred to the brief as a *Reply* brief rather than a *Respondent's* brief. Due to our error, the Court issued an Order enlarging the time to file a *Reply* rather than a *Respondent's* brief. The *Reply* brief was filed on February 11, 2022. We request additional time to file the initial Respondent's Brief.

If you would kindly have your staff file the **Amended Motion for Leave to File Initial Respondents' Brief and Designation of Matter of Appellant-Respondent Out of Time and Proof of Service** and return a clocked copy to me.

Respectfully,

Stephen B. Samuels

SBS/wp
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
Beth Richardson, Esquire
T. Jeff Goodwyn, Esquire



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