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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.

**RESPONDENTS SOUTH CAROLINA PROPERTY AND CASUALTY INSURANCE
GUARANTY ASSOCIATION ON BEHALF OF GUARANTEE INSURANCE
COMPANY AND COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC.'S
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

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

1. Full Commission Order dated April 6, 2021
2. Single Commissioner Order dated July 31, 2020
3. Guarantee's Full Commission Brief dated October 19, 2020
4. Guarantee's Brief in Response to Claimant's Appeal dated November 3, 2020
5. Guarantee and Countrywide's Joint Full Commission Brief dated November 3, 2020
6. Condustrual's Initial Brief
7. July 24, 2017 hearing transcript
8. October 12, 2017 hearing transcript
9. October 13, 2017 hearing transcript
10. November 2, 2017 hearing transcript
11. November 3, 2017 hearing transcript

12. November 4, 2017 hearing transcript
13. November 6, 2017 hearing transcript
14. September 5, 2015 Palmetto Health Richland Discharge Summary (APA pgs. 7-8)
15. September 16, 2015 SOVA Physician's Disability Report (APA pg. 291)
16. October 1, 2015 Form 50 – Employee's Notice of Claim (Condustrial 314-315)
17. October 20, 2015 USC Ortho Parkridge Order Requisition (APA pg. 28)
18. October 21, 2015 PHP Progress Note (APA pg. 38)
19. November 13, 2015 PHP Progress Note (APA pg. 79)
20. November 17, 2015 PHP Progress Note (APA pg. 81)
21. November 19, 2015 PHP Progress Note (APA pg. 83)
22. November 20, 2015 PHP Progress Note (APA pg. 84)
23. November 20, 2015 PHP Discharge Summary (APA pgs. 53-54)
24. March 11, 2015 Countrywide Service Agreement (APA pgs.762-771)
25. March 24, 2015 Procedural Amendment to Contract Labor Service Agreement (APA pgs. 786-788)
26. Condustrial Payroll August 2015 (APA pgs. 592-641)
27. Condustrial Payroll September 2015 (APA pgs. 642-710)
28. List of Locations from Condustrial to Countrywide (APA pgs. 735-737)
29. Policy – Countrywide (APA pgs. 375-534)
30. July 30, 2015 Policy Endorsement (APA pgs. 535-567)
31. July 20, 2015 Policy Endorsement (APA pgs. 796-825)
32. Guarantee Trial Exhibits 7-13
33. Personnel Service Agreement between SCDC and Medustrial (APA pgs. 254-255)
34. Independent Contractor Agreement (APA 318)

I certify that this designation contains no matter which is irrelevant to this appeal.

s/Beth B. Richardson
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March 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

I certify that I have caused the **Respondents South Carolina Property and Casualty Insurance Guaranty Association on Behalf of Guarantee Insurance Company and Countrywide Staffing Solutions Group, Inc.'s Designation of Matter to be Included in the Record on Appeal** to be served on all attorneys of record by electronic mail on March 3, 2022 at the following addresses:

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Attorneys for Respondent

March 3, 2022

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Subject: Turner v. Guarantee - Initial Joint Briefs of Guarantee and Countrywide and Designation of Matter with Proofs of Service [IMAN-CLIENTS.FID59158]
Date: Thursday, March 3, 2022 5:47:08 PM
Attachments: [image001.png](#)
[GUARANTEE_COUNTRYWIDE_Joint_Initial_Respondent's_Brief_to_Appellant_CONDUSTRIAL'S_Initial_Brief.pdf](#)
[Proof_of_Service_-_Respondent's_Joint_Initial_Brief_to_Condustrual's_Appeal.pdf](#)
[GUARANTEE_COUNTRYWIDE_Joint_Initial_Respondents'_Brief_to_Appellant_TURNER's_Initial_Brief.pdf](#)
[Proof_of_Service_-_Respondents_Joint_Initial_Brief_to_Turner's_Appeal.pdf](#)
[Designation_of_Matter_-_Guarantee.pdf](#)
[Proof_of_Service_-_Respondent's_Designation_of_Matter.pdf](#)

Dear Counsel:

The attached are being filed with the SC Court of Appeals this afternoon. Documents being filed include the following:

1. INITIAL JOINT BRIEF OF RESPONDENTS SOUTH CAROLINA PROPERTY AND CASUALTY INSURANCE GUARANTY ASSOCIATION ON BEHALF OF GUARANTEE INSURANCE COMPANY AND COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC. TO RESPONDENT-APPELLANT CONDUSTRIAL, INC. F/K/A MEDUSTRIAL HEALTHCARE STAFFING SERVICE INITIAL BRIEF OF APPELLANT
2. PROOF OF SERVICE – INITIAL JOINT BRIEF OF RESPONDENTS SOUTH CAROLINA PROPERTY AND CASUALTY INSURANCE GUARANTY ASSOCIATION ON BEHALF OF GUARANTEE INSURANCE COMPANY AND COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC. TO RESPONDENT-APPELLANT CONDUSTRIAL, INC. F/K/A MEDUSTRIAL HEALTHCARE STAFFING SERVICE INITIAL BRIEF OF APPELLANT
3. INITIAL JOINT BRIEF OF RESPONDENTS SOUTH CAROLINA PROPERTY AND CASUALTY INSURANCE GUARANTY ASSOCIATION ON BEHALF OF GUARANTEE INSURANCE COMPANY AND COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC. TO APPELLANT-RESPONDENT RACHEL J. TURNER’S INITIAL BRIEF OF APPELLANT
4. PROOF OF SERVICE - INITIAL JOINT BRIEF OF RESPONDENTS SOUTH CAROLINA PROPERTY AND CASUALTY INSURANCE GUARANTY ASSOCIATION ON BEHALF OF GUARANTEE INSURANCE COMPANY AND COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC. TO APPELLANT-RESPONDENT RACHEL J. TURNER’S INITIAL BRIEF OF APPELLANT
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6. PROOF OF SERVICE - RESPONDENTS SOUTH CAROLINA PROPERTY AND CASUALTY INSURANCE GUARANTY ASSOCIATION ON BEHALF OF GUARANTEE INSURANCE COMPANY AND

COUNTRYWIDE STAFFING SOLUTIONS GROUP, INC.'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

A copy of this email will be included with the Proofs of Service for the Court.

With kindest regards,
Cyndi Nygord



CYNDI NYGORD PARALEGAL

DIRECT 803.231.7845

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Supporting Green print wisely.