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Mar 08 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.

**SECOND MOTION FOR LEAVE TO FILE  
INITIAL RESPONDENTS' BRIEF AND DESIGNATION OF MATTER 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 Respondents' Brief and Designation of Matter of Appellant-Respondent Condustrual**. The Respondents' Brief is currently due on March 8, 2022. If the Motion is granted, the due date will be extended to April 6, 2022. As grounds for granting this Motion, Appellant-Respondent would show additional time is needed as this is a complicated case with multiple issues requiring extensive briefing along with a large record from eight days of trial.

Additionally, Appellant-Respondent was served with the Initial Respondents' Brief of Countrywide Staffing Solutions Group on March 3, 2022. This Brief raises new arguments and authority requiring additional writing in the Initial Respondents' Brief.

Therefore, Appellant-Respondent moves the Court to extend the time for filing the **Initial Respondent's Brief and Designation of Matter of Appellant-Respondent** to April 6, 2022.

Respectfully Submitted



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Attorney for Appellant-Respondent

March 8, 2022

Columbia, South Carolina

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Group, Inc.; South Carolina Department of Corrections; State  
Accident Fund; and South Carolina Uninsured Employer's Fund, . . . Respondents

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

**PROOF OF SERVICE**

I certify that I, Wanda Powell, Paralegal to Stephen B. Samuels have caused  
the **Second Motion for Leave to File Initial Respondents' Brief and Designation  
of Matter of Appellant-Respondent Out of Time** to be served on the parties below,  
via electronic service addressed as follows:

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Wanda Powell, Paralegal

March 8, 2022



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

March 8, 2022

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**Mar 08 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 **Second Motion for Leave to File Initial Respondents' Brief and Designation of Matter of Appellant-Respondent** 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.

If you would kindly have your staff file the **Second Motion for Leave to File Initial Respondents' Brief and Designation of Matter of Appellant-Respondent** 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