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**Mar 14 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

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Appellate Case Number 2021-000633

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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.

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**RESPONDENT-APPELLANT CONDUSTRUAL'S MOTION FOR EXTENSION TO  
FILE A CONSOLIDATED REPLY BRIEF TO ALL RESPONDENTS' BRIEFS**

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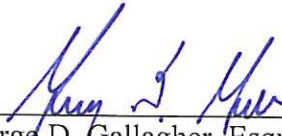
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Speed, Seta, Martin, Trivett & Stublely, LLC  
P.O. Box 11669  
Columbia, SC 29211  
(803) 748-2919  
Attorney for Respondents

RESPONDENT-APPELLANT'S MOTION FOR EXTENSION IS BASED ON THE FOLLOWING GROUNDS:

1. Respondent-Appellant Condustrual, Inc. f/k/a Medustrial Healthcare Staffing's ("Condustrual") Reply Brief to the joint Respondents' Brief of Guarantee Insurance Co. ("Guarantee") and Countrywide Staffing Solutions Group ("Countrywide") was due to be filed with the Court on or before March 14, 2022.
2. Appellant-Respondent Turner recently filed a Motion for Extension to file her Respondents Initial Brief. By Order of the Court via Order dated March 10, 2022 the date for Turner's filing was extended until April 7, 2022.
3. In the in the interests of economy, Condustrual wishes to reserve its right to file a single Reply Brief to the Respondents' Briefs from Tuner, Countrywide, and/or Guarantee. Per SCACR 208 (a)(3) a Reply Brief is due within ten (10) days of service of the respondent's brief.

For these reasons Condustrual respectfully requests leave to file a single Reply Brief to ALL Respondents' Briefs, the last of which is due on or before April 7, 2022. By rule Condustrual prays for an extension for filing until ten (10) days thereafter, which is on or before April 17, 2022.

Respectfully Submitted,

  
\_\_\_\_\_  
George D. Gallagher, Esquire  
Counsel for Appellant-Respondent Condustrual, Inc.  
f/k/a Medustrial Healthcare Staffing  
S.C. Bar # 12149

Columbia, SC  
March 14, 2022

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

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**PROOF OF SERVICE**

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I certify that I have served the Motion for Extension of Time to File Respondent-Appellant Condustrual, Inc.'s Consolidated Reply Brief to all Respondents Briefs by electronic mail and/or by depositing a copy of it in the United States Mail, postage prepaid, on March 14, 2022, addressed to all attorneys of record at the addresses below:

The Honorable Amy Bracy  
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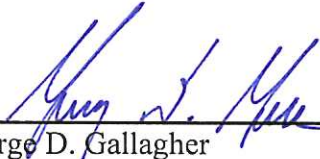
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March 14, 2022

  
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March 14, 2022

VIA EMAIL: CTAPPFILINGS@SCCOURTS.ORG

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE:** *Rachel Turner v. SC Department of Corrections – Kirkland, et al*  
*Appellate Case No.: 2021-000633*  
*WCC No.: 1514359*  
*DOA: 9/5/2015*  
*Our File No.: 8400-0101*

Dear Ms. Kitchings:

Please find enclosed Respondent-Appellant Condustrual's Motion for Extension in the above-referenced matter.

By copy of this letter to all counsel of the involved parties, I am serving them with the Motion.

Sincerely,

  
George D. Gallagher, Esquire

GDG/rs

Enclosures

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