

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Apr 07 2022

SC 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.

**THIRD MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER OF
APPELLANT-RESPONDENT**

Appellant-Respondent, by and through her undersigned attorney hereby moves this Honorable Court for a 15-day extension in which to file the **Respondent's Initial Brief of Appellant-Respondent and Designation of Matter**. The Brief is currently due on April 7, 2022. If the extension is granted, the Brief will be due on April 22, 2022.

As grounds for this Motion, Appellant would show additional time is needed for the writing of her brief as counsel has been unexpectedly out of state from March 23-April 5, 2022 attending to matters with his father's declining health and subsequent passing on April 1, 2022. Counsel returned to his office on April 6, 2022. Additionally, this appeal involves multiple complex issues with an extensive record following seven days of trial. Counsel believes this situation involves extraordinary circumstances warranting granting the relief requested.



Stephen B. Samuels
Samuels Reynolds Law Firm, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000
stephen@samuelsreynolds.com
Attorney for Appellant-Respondent

April 7, 2022

Columbia, South Carolina

RECEIVED

Apr 07 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 Conustrial, 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 Conustrial, 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 **Third Motion for Extension of Time to File the Respondent's Initial Brief**
and **Designation of Matter of Appellant-Respondent** to be served on the parties
below, via electronic service addressed as follows:

Erin Farthing, Esquire
State Accident Fund
PO Box 1166
Lexington, SC 29071
efarthing@saf.sc.gov

Gregory M. Alford, Esquire
PO Drawer 8008
Hilton Head Island, SC 29938
gregg@alfordlawsc.com

Lisa C. Glover, Esquire
SC Uninsured Employers' Fund
PO Box 1815
Lexington, SC 29071
lglover@saf.sc.gov

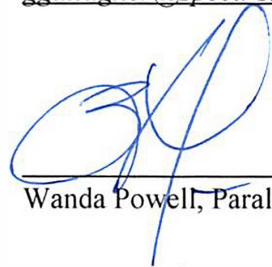
T. Jeff Goodwyn, Esquire
2309 Devine Street
Columbia, SC 29205
Tgoodwyn@Goodwynlaw.com

Beth Richardson, Esquire
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211
brichardson@sowellgray.com

Grady L. Beard, Esquire
Robinson Gray Stepp & Laffitte, LLC
PO Box 11449
Columbia, SC 29211
gbeard@robinsongray.com

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

George D. Gallagher, Esquire
Speed, Seta, Martin, Trivett & Stublely
PO Box 11669
Columbia, SC 29211
ggallagher@speed-seta.com



Wanda Powell, Paralegal

April 7, 2022



STEPHEN B. SAMUELS
P. JASON REYNOLDS
C. DAVID BEALE, JR.
ATTORNEYS AT LAW

April 7, 2022

Via email: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED
Apr 07 2022
SC Court of Appeals

RE: Rachel J. Turner v. Medustrial Healthcare
Appellate Case No. 2021-000633

Dear Ms. Kitchings:

Enclosed for filing please find Appellant-Respondent's **Third Motion for Extension of Time to File the Respondent's Initial Brief and Designation of Matter** of the Appellant-Respondent regarding the above referenced matter.

If you would kindly have your staff file the **Third Motion for Extension of Time to File the Respondent's Initial Brief of Appellant-Respondent and Designation of Matter** and return a clocked copy to me.

Respectfully,

A handwritten signature in blue ink, appearing to be "SBS", written over a light blue horizontal line.

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

WE WORK FOR THE PEOPLE WHO WORK