

RECEIVED

Apr 15 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Case Number 2021-000633

Rachel J. Turner, Employee, Appellant-Respondent,

v.

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

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

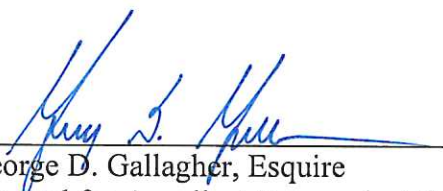
George D. Gallagher, Esquire
Speed, Seta, Martin, Trivett & Stublely
Fickling, LLC
P.O. Box 11669
Columbia, SC 29211
(803) 748-2919
Attorney for Respondents

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

1. By Order dated March 18, 2022 the Court previously granted Respondent-Appellant Condustrual, Inc. f/k/a Medustrial Healthcare Staffing’s (“Condustrual”) Motion to file its consolidated Reply Brief to ALL Respondents’ Briefs. The date for filing was extended until April 18, 2022.
2. Subsequently, Appellant-Respondent filed another Motion to Extension to file her Respondent’s Brief, which was granted via Order of the Court dated April 12, 2022. The date for that filing was extended until April 22, 2022.
3. Condustrual now requests another extension to file its consolidated Reply Brief to all Respondents’ briefs until after Appellant-Respondent has filed her Brief.

For these reasons Condustrual respectfully requests leave to file its consolidated Reply Brief to ALL Respondents’ Briefs, the last of which is due on or before April 22, 2022. By operation of SCACR 208 (a) (3) Condustrual prays for an extension for filing until ten (10) days thereafter, which is on or before May 2, 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
April 15, 2022

RECEIVED

Apr 15 2022

SC Court of Appeals

PROOF OF SERVICE

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2021-000633

Rachel J. Turner, Employee, Appellant-Respondent,

v.

Medustrial Healthcare Staffing Service and Condustrail, 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 Condustrail, Inc. f/k/a Medustrial Healthcare Staffing Service, Employer, is the Respondent-Appellant.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Respondent-Appellant Condustrail, Inc.'s Consolidated Initial 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 April 15, 2022, addressed to all attorneys of record at the addresses below:

The Honorable Amy Bracy
Judicial Director
S.C. Workers' Compensation
Commission
Post Office Box 1715
Columbia, SC 29202
judicial@wcc.sc.gov

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

Gregory M. Alford, Esq.
Attorney at Law
PO Drawer 8008
HILTON HEAD
ISLAND, SC 29938
gregg@alfordlawsc.com

Lisa C. Glover, Esq.
SC Uninsured Employers' Fund
P:O Box 1815
Lexington, SC 29071
lglover@saf.sc.gov

T. Jeff Goodwyn Jr., Esq.
Attorney at Law
2309 Devine Street
COLUMBIA, SC 29205
jgoodwyn@goodwynlaw.com

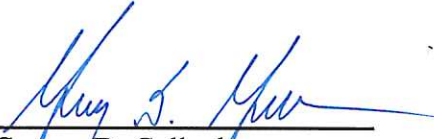
Beth Richardson, Esq.
Robinson Gray Stepp & Laffitte,
LLC
PO Box 11449
Columbia, SC 29211
brichardson@sowellgray.com

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

James P. Newman, Jr., Esq.
Howser, Newman & Besley, LLC
P O Box 12009
Columbia, SC 29211
jnewman@hnblaw.com

Stephen B. Samuels, Esq.
Samuels Reynolds Law Firm
1320 Richland Street
Columbia, SC 29201
stephen@samuelsreynolds.com

April 15, 2022


George D. Gallagher
Speed, Seta, Martin, Trivett, Stubley &
Fickling, LLC
Bar No. 12149
Post Office Box 11669
Columbia, South Carolina 29211
Attorney for Appellant-Respondent
Condustrial, Inc.

SPEED, SETA, MARTIN, TRIVETT, STUBLEY & FICKLING, LLC
ATTORNEYS AT LAW

WALLACE SPEED (1940-2020)
LESLI R. SETA (GA & FL)
SETH C. MARTIN (GA & FL)
ERIC L. TRIVETT (GA)
M. STEPHEN STUBLEY (SC)
JAMES E.L. FICKLING (SC & NC)
STEPHANIE A. ROCKWELL (GA & TN)
ANDREA S. OWEN (GA)
HUNTER CHANDLER (GA & TN)

REPLY TO
P.O. BOX 11669
COLUMBIA, SOUTH CAROLINA 29211
PHONE (803) 748-2919
FAX (803) 748-2735
www.Speed-Seta.com

ALEXANDER ADKINS (GA & TN)
ANDYNE B. ANDERSON (GA)
SCOTT H. ANDREWS (GA)
MELISSA CRUZ (GA & TN)
JEREMY T. ENGLAND (AL & MS)
C. BENTON HILBURN (GA)
SARA P. MORRIS (SC & NC)
CALEY A. PITTS (GA)
KELSIE L. QUEEN (SC & NC)
JENNIFER S. RAY (GA)
LAWRENCE ROSS (GA)
SARAH V. SNIPES (GA)
LINDSEY R. STEWART (GA)
MATTHEW W. STRUBLE (GA)
MARK M. STUBLEY, JR. (AL, NC & SC)
BRIGGS P. TUCKER (SC)
BRITTANY BELL TURNER (GA & FL)
LILY D. WILKERSON (GA & FL)
∞
GEORGE D. GALLAGHER (SC)
CHARLES A. KINNEY (GA, NC & SC)

April 15, 2022

VIA EMAIL: CTAPPFILINGS@SCCOURTS.ORG

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

RECEIVED

Apr 15 2022

SC Court of Appeals

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 Condustrial'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 this Motion.

Sincerely,


George D. Gallagher, Esquire

GDG/rs
Enclosure

cc: The Hon. Amy Bracy
Stephen B. Samuels, Esq.
Erin Farthing, Esq.
Gregory M. Alford, Esq.
Lisa C. Glover, Esq.
T. Jeff Goodwyn Jr., Esq.
Beth Richardson, Esq.
Grady L. Beard, Esq.
James P. Newman, Jr., Esq.
Tom Sears, Esq.