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May 16 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS
THE HONORABLE DANIEL COBLE
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2025-000378
CIVIL ACTION NO. 2024-CP-40-3454

Bernard Bagley, #175851.....**APPELLANT,**

v.

Palmetto Richland Hospital Prisma Health, John Doe, Surgeon, and South Carolina Department
of Corrections Division of Health Services, Defendants,

of which Palmetto Richland Hospital Prisma Health is the.....**RESPONDENT.**

CONSENT MOTION SUBSTITUTION OF COUNSEL

Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules, Attorney James E. Parham, Jr., respectfully requests the Court issue an order permitting his withdrawal as counsel for Respondent at Respondent’s request and with Respondent’s consent. Carmen V. Ganjehsani, R. Wilder Harte, and Ashwin R. Sanzgiri respectfully ask the Court to be substituted as counsel for Respondent.

[signature page to follow]

We Consent:

s/James E. Parham

James E. Parham, Jr. (S.C. Bar No. 4335)

James E. Parham, Jr., P.A.

PO Box 1576

Irmo, SC 29063

(803) 749-8555

s/Ashwin R. Sanzgi

Carmen Vaughn Ganjehsani (S.C. Bar No. 73515)

R. Wilder Harte (SC Bar No. 101228)

Ashwin R. Sanzgi (S.C. Bar No. 105198)

RICHARDSON, PLOWDEN & ROBINSON, PA

1900 Barnwell Street (29201)

Post Office Drawer 7788

Columbia, South Carolina 29202

(803) 771-4400

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CERTIFICATE OF SERVICE

I, Ashwin R. Sanzgiri, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Respondent Palmetto Richland Hospital Prisma Health (Prisma Health), do hereby certify that I have on this date served the foregoing **Consent Motion for Substitution of Counsel** on Appellant Bernard Bagley pursuant to Rule 262 of the South Carolina Appellate Court Rules by depositing a copy in the U.S. mail, properly addressed at the last known address, with sufficient first class postage attached, directed to the following address:

Bernard Bagley
#175851 / SB21b / KER.CI
4848 Goldmine Highway
Kershaw, South Carolina 29067

An image of the above referenced correspondence is attached hereto.

/s Ashwin R. Sanzgiri

Ashwin R. Sanzgiri (S.C. Bar No. 105198)
RICHARDSON, PLOWDEN & ROBINSON, PA
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400

ATTORNEY FOR RESPONDENT PRISMA HEALTH

Date: May 16, 2025

RICHARDSON
RICHARDSON PLOWDEN ROBINSON, P.A.
PLOWDEN
ATTORNEYS AT LAW

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Bernard Bagley
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REPLY TO: Columbia
E-Mail: asanzgiri@richardsonplowden.com
Direct Dial: (803) 576-3732

May 16, 2025

VIA U.S. MAIL

Bernard Bagley
#175851/SB21b/KER.CI
4848 Gold Mine Highway
Kershaw, South Carolina 29067

RE: *Bernard Bagley, #175851 v. Palmetto Richland Hospital Prisma Health*
Appellate Case No. 2025-000378

Dear Mr. Bagley:

Enclosed please find our Consent Motion for Substitution of Counsel in the above-referenced matter.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ashwin R. Sanzgiri".

Ashwin R. Sanzgiri

cc: Carmen V. Ganjehsani, Esq. (via email w/ attach.)
R. Wilder Harte, Esq. (via email w/attach.)

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We Consent:

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James E. Parham, Jr. (S.C. Bar No. 4335)

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s/Ashwin R. Sanzgi

Carmen Vaughn Ganjehsani (S.C. Bar No. 73515)

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May 16, 2025

Filed via e-mail (ctappfilings@sccourts.org)

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

RE: *Bernard Bagley, #175851 v. Palmetto Richland Hospital Prisma Health*
Appellate Case No. 2025-000378

Dear Ms. Kitchings:

Respondent Palmetto Richland Hospital Prisma Health (Prisma Health) wishes to substitute counsel in the above matter. James E. Parham Jr. currently represents Respondent. Respondent wishes to substitute in the following attorneys from Richardson, Plowden & Robinson, P.A. as attorneys of record in the above matter: Carmen V. Ganjehsani, R. Wilder Harte, and Ashwin R. Sanzgiri.

If the Court requires anything further or you have any questions, please do not hesitate to contact me. We appreciate the Court's time and consideration of this matter.

Sincerely,

Ashwin Sanzgiri

cc: Bernard Bagley (via U.S. Mail)
James E. Parham Jr. (via email)
Carmen V. Ganjehsani (via email)
R. Wilder Harte (via email)