

79049

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

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge  
Tanya A. Gee, Circuit Court Judge

Civil Action No.: 2013-CP-40-05675  
Appellate Case No.: 2015-001627

**RECEIVED**  
MAR 24 2016  
SC Court of Appeals

Willie J. Riley .....Appellant,

vs.

Dennis Wayne Catoe.....Respondent.


**MOTION TO  
SUBSTITUTE COUNSEL**

Pursuant to Rule 264(b) of the SCACR, Respondent Dennis Wayne Catoe hereby comes before this honorable court consenting to the withdrawal of Sheila M. Bias, Esquire, as one of his attorneys of record and that Carmen Ganjehsani, Esquire, be substituted as counsel for Respondent Dennis Wayne Catoe.

The grounds of this Motion are that after March 23, 2016, Ms. Bias will no longer be employed by Richardson, Plowden & Robinson, P.A.; therefore, Respondents are informed and believed that it is appropriate that Attorney Ganjehsani be substituted as his counsel to continue in the defense of this matter. Attorney Leslie A. Cotter, Jr., will also remain as counsel for Respondent.

*Signature to Follow*

Respectfully submitted,

A handwritten signature in cursive script that reads "Sheila Bias". The signature is written in black ink and is positioned above a horizontal line.

Sheila M. Bias, Esquire  
Richardson Plowden & Robinson, P.A.  
1900 Barnwell Street  
Columbia, South Carolina 29201  
803-771-4400

*Attorneys for Respondent*

March 23, 2016  
Columbia, South Carolina

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Willie J. Riley .....Appellant,

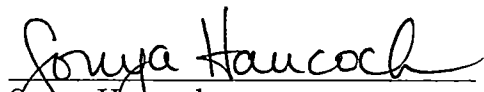
vs.

Dennis Wayne Catoe.....Respondent.

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson, Plowden & Robinson, P.A., attorneys for Respondents, do hereby certify that I have this date served the foregoing *Motion to Substitute Counsel* by personally depositing a copy of same in a United States Postal Service mailbox, postage paid, addressed to the following:

Willie J. Riley  
84 Wild Indigo Court  
Columbia, South Carolina 29229  
**Pro-se Appellant**

  
Sonya Hancock

Dated: March 23, 2016

March 23, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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SC Court of Appeals

Re: Willie J. Riley v. Dennis Wayne Catoe  
Appellate Case No.: 2015-001627  
C/A No.: 2013-CP-40-05675  
RPR File No.: 101-2630

Dear Ms. Kitchings:

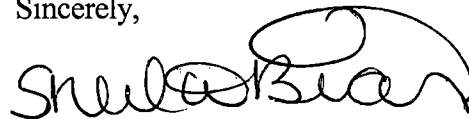
As Counsel for Respondent, Dennis Wayne Catoe, we have enclosed for filing an original *Motion to Substitute Counsel* specifically substituting Carmen Ganjehsani, Esquire, for Sheila M. Bias, Esquire, in the above referenced matter. Leslie A. Cotter, Jr., Esquire, will also remain as counsel for Respondent. I have also enclosed seven (7) additional copies of same for the Court and request that one (1) filed, stamped copy please be returned in the enclosed envelope.

We are this day serving a copy of our *Motion to Substitute Counsel* on the *Pro-se* Appellant, Willie J. Riley.

Thank you for your assistance.

With regards, I am,

Sincerely,



Sheila M. Bias  
SC Bar # 10005

SMB/smh  
Enclosures

cc: Willie J. Riley, *Pro-se* Appellant (via U.S. Mail)  
Carmen Ganjehsani, Esquire (via email only)  
Leslie A. Cotter, Jr., Esquire (via email only)

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

SMB 101-2630

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

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The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**SC Court of Appeals**

