

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jean H. Toal, Circuit Court Judge  
DeAndrea G. Benjamin, Circuit Court Judge  
James P. Kelly, Arbitrator

RECEIVED  
OCT 16 2017  
SC Court of Appeals

Case No. 2014-CP-40-6017

Rajinder Parmar, ..... Respondent,

v.

Balbir S. Minhas, Midlands  
Gastroenterology, PC, and  
Midlands Endoscopy Center, LLC ..... Appellants.

**REPLY**

Pursuant to Rule 240(f), SCACR, Appellants file the following Reply to the Return and objection filed by Respondent to Appellants' counsel's Motion to Withdraw and Appellants' request for additional time to obtain new counsel.

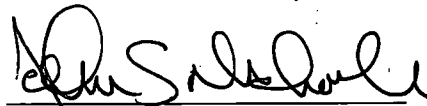
First, Respondents note that Appellants listed trial counsel on their notice of appeal. (Return, p. 2). Of course, listing all counsel in the lower court is required by Rule 264(a), SCACR. Once the undersigned counsel notified the Appellants of his impending departure from active practice (the announcement and notification was delayed until September 14, 2017 at the request of Chief Justice Beatty), Appellants immediately began seeking substitute counsel. The remaining counsel of record, Christian Stegmaier and the Honorable James E.

Smith, Jr., were hired only for assistance at the trial level pursuant to Rule 1.2(c), RPC, Rule 407, SCACR, and each intends to move this Court to withdraw as well with the Appellants' consent.

Second, while the corporate appellants may not appear *pro se* under *Renaissance Enterprises, Inc. v. Summit Teleservices, Inc.*, 334 S.C. 649, 515 S.E.2d 257 (1999), Respondent also obtained a judgment against Appellant Minhas in his individual capacity. An individual most certainly may choose to appear *pro se* (unless Respondent is willing to dismiss Dr. Minhas from the case as an individual).

Third, Respondent is critical of Appellants' failure to request an additional extension of time to file the initial brief, and requests that this Court dismiss the appeal under Rules 208(a)(4) and 260, SCACR. However, the undersigned's motion to be relieved as counsel automatically stays "the time limits for perfecting the appeal until the motion is decided." Rule 240(b), SCACR (last sentence). Accordingly, contrary to Respondent's request, it would be improper for the Court to dismiss this appeal.

Respectfully submitted,



John S. Nichols, # 4210  
BLUESTEIN ATTORNEYS, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202

Attorney for Appellants

October 16, 2017

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**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondent with a copy of the *Reply to Return to Motion to Withdraw* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

E. Wade Mullins, III  
Caitlin C. Heyward, Esquire  
Bruner Powell Wall & Mullins, LLC  
PO Box 61110  
Columbia, SC 29260-1110

*Erin Bridges*

Erin Bridges

October 16, 2017

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VIA HAND DELIVERY

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

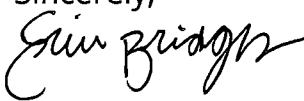
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RE: Rajinder Parmar v. Balbir Minhas, Midlands Gastroenterology and  
Midlands Endoscopy Center, LLC  
Case Tracking No.: 2017-000994

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the *Reply to Return to Motion to Withdraw* in reference to the above matter. I have enclosed a proof of service of this document on counsel for the Respondent. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,  
  
Erin Bridges  
Paralegal  
BLUESTEIN ATTORNEYS

/emb

Enclosures

cc: Christian Stegmaier, Esquire  
Joel W. Collins, Jr., Esquire  
James Smith, Esquire  
Neil B. Caesar, Esquire  
E. Wade Mullins, Esquire