

THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No: 2016-002312

RECEIVED

OCT 23 2017

S.C. SUPREME COURT

Juan Michael Ramirez ..... Petitioner,

v.

Progressive Northern Insurance Company ..... Respondent.

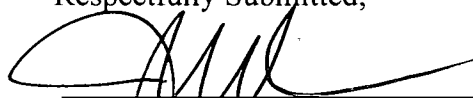
**MOTION FOR SUBSTITUTION OF COUNSEL**

J.R. Murphy, Esquire  
S.C. Bar No. 7941  
Murphy & Grantland, P.A.  
P.O. Box 6648  
Columbia, SC 29260  
(803) 782-4100  
[jrmurphy@murphygrantland.com](mailto:jrmurphy@murphygrantland.com)  
Proposed Substitute Counsel for  
Respondent Progressive  
Northern Insurance Company

Pursuant to Rule 11(b), SCRCP, and Rule 264, SCACR, the undersigned counsel respectfully moves before this Court for an Order substituting J.R. Murphy, of Murphy & Grantland, P.A. for Bradley L. Lanford, of the Law Office of Kenneth E. Berger (formerly of Baker, Ravenel & Bender, L.L.P), as counsel of record for Respondent Progressive Northern Insurance Company. Respondent, Progressive Northern Insurance Company, has consented to this requested substitution.

Both attorney Bradley L. Lanford and attorney J.R. Murphy consent to this requested substitution of counsel. In addition, opposing counsel, Edwin L. Turnage, was given written notice in advance of this motion pursuant to Rule 264(b), SCACR.

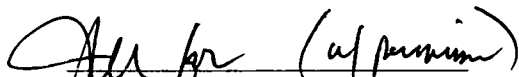
Respectfully Submitted,



J.R. Murphy, Esquire  
S.C. Bar No. 7941  
Murphy & Grantland, P.A.  
P.O. Box 6648  
Columbia, South Carolina 29260  
(803) 782 -4100  
jrmurphy@murphygrantland.com

Columbia, South Carolina  
October 20, 2017

I CONSENT:



Bradley L. Lanford  
Law Office of Kenneth E. Berger  
5205 Forest Drive, Suite 2  
Columbia, SC 29206  
(803)790-2800  
blanford@bergerlawsc.com  
Attorney for Respondent

**THE STATE OF SOUTH CAROLINA  
In the Supreme Court**

Juan Michael Ramirez, Appellant,

v.

Progressive Northern Insurance Company, Respondent,

Appellate Case No. 2016-002312

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Appeal from Laurens County  
R. Lawton McIntosh, Circuit Court Judge

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**ORDER SUBSTITUTING COUNSEL**

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THIS MATTER comes before the Court on the motion of Respondent, with the consent of all the parties hereto and their respective counsel, seeking an Order substituting J.R. Murphy, of Murphy & Grantland, P.A. for Bradley L. Lanford, of the Law Office of Kenneth E. Berger (formerly of Baker, Ravenel & Bender, L.L.P), as counsel of record for Respondent Progressive Northern Insurance Company.

IT IS ORDERED that attorney Bradley L. Lanford is relieved as counsel for Respondent and J.R. Murphy is hereby substituted as counsel of record for Respondent.

IT IS SO ORDERED.

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FOR THE COURT



MURPHY & GRANTLAND, P.A.

J. R. Murphy  
Direct dial 803-454-1231  
jrmurphy@murphygrantland.com

October 23, 2017

**HAND DELIVERED**

Honorable Daniel E. Shearouse, Clerk  
South Carolina Supreme Court  
Supreme Court Building  
1231 Gervais Street  
P.O. Box 11330  
Columbia, SC 29211-1330

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OCT 23 2017

S.C. SUPREME COURT

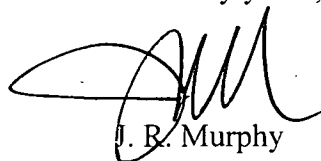
Re: Juan Michael Ramirez vs. Progressive Northern Insurance Company  
Civil Action No.: 2016-002312  
Claim No.: 13-3945718  
Date of Loss: 4/11/13  
Our File No.: 1115-2949

Dear Mr. Shearouse:

Enclosed please find herewith for filing with the Court the original and nine (9) copies Motion for Substitution of Counsel and the original and seventeen (17) copies of Respondent's Brief in the above-referenced matter. I would appreciate your filing the original and returning the clocked copies to me by individual delivering same. Also enclosed please find the filing fee for submission of the Motion. Please return a receipt for same in the envelope enclosed. By copy of this letter I am serving same on opposing counsel.

With warm personal regards, I am

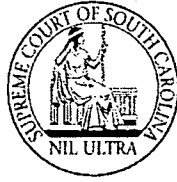
Sincerely yours,



J. R. Murphy

JRM/sb  
Enclosures

cc: Edwin L. Turnage, Esquire  
Stephen T. Persia



# The Supreme Court of South Carolina

Murphy & Grantland, PA

10/23/2017

## RECEIPT #84915

**Case No:** 2016-002312  
**Case Short Title:** Juan Ramirez v. Progressive Northern  
**Event:** Motion - Relieve / Withdraw / Substitute as Counsel  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 57044  
**Check/Money Order Date:** 10/20/2017  
**Comments:**