

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHALAND COUNTY
Court Of Common Pleas

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

RECEIVED
NOV 16 2017
SC Court of Appeals

Case No.: 2014-CP-40-6017
Appellate Case No. 2017-000994

Rajinder Parmar.....Respondent,

vs.

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

**RESPONDENT’S RETURN TO JAMES E. SMITH, JR.’S MOTION TO
WITHDRAW AS COUNSEL OF RECORD**

The Respondent Rajinder Parmar (“Respondent”) submits this Return in to Appellants’ Motion to Withdraw as Counsel of Record of James E. Smith Jr.

On October 30, 2017, this Court granted Appellants’ attorney John S. Nichols’s Motion to Withdraw as Counsel of Record and granted appellants 60 days from the date of that order to obtain substitute counsel. Therefore, Appellants are required to obtain substitute appellate counsel on or before December 29, 2017. As Mr. Nichols indicated in his Reply to Respondent’s Return to Mr. Nichol’s Motion to Withdraw as Counsel, Mr. Smith, Mr. Collins, and Mr. Stegmaier “were hired only for assistance at the trial level” and do not represent Appellants in this appeal.

Respondent does not object to Mr. Smith's Motion to Withdraw. However, in his Motion Mr. Smith has also requested this Court grant Appellants sixty (60) days to advise the Court whether they intend to proceed with substitute appellate counsel or *pro se*. Because Mr. Smith does not represent Appellants in this appeal, an additional 60 days for Appellants to obtain substitute counsel beyond the 60 days this court granted Appellants in its Order dated October 30, 2017 is unnecessary.

For that reason, Respondent respectfully asks this Court maintain the deadline set forth in its October 30, 2017 Order.

Respectfully Submitted,

November 16, 2017



E. Wade Mullins III
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Attorneys for Respondents

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PROOF OF SERVICE

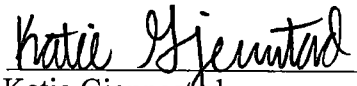
I, Katie Gjennestad, of Bruner, Powell, Wall & Mullins, LLC, attorneys for the Respondent, do hereby certify that on this 16th day of November 2017, I served the **RESPONDENT'S RETURN TO JAMES E. SMITH, JR.'S MOTION TO WITHDRAW AS COUNSEL OF RECORD** upon the Appellants' attorneys of record by depositing a copy of the same in U.S. Mail, first class, postage prepaid and addressed as follows:

John S. Nichols, Esquire
Bluestein, Nichols, Thompson & Delgado, LLC
Post Office Box 7965
Columbia, SC 29202

Joel W. Collins, Jr., Esquire
Christian Stegmaier, Esquire
Collins & Lacy, P.C.
Post Office Box 12487
Columbia, SC 29211

James Emerson Smith, Jr., Esquire
James E. Smith, Jr., PA
1422 Laurel Street
Columbia, SC 29201

November 16, 2017


Katie Gjennestad

BRUNER, POWELL, WALL & MULLINS, LLC

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BENJAMIN C. BRUNER, P.A.

AUTHOR'S E-MAIL: KGJENNESTAD@BRUNERPOWELL.COM

** Also Admitted in District of Columbia

November 16, 2017

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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**Re: Rajinder Parmar vs. Balbir S. Minhas, Midlands Gastroenterology and
Midlands Endoscopy Center, LLC
Appellate Case No.: 2017-000994
C/A No.: 2014-CP-40-6017
Our File No.: 7-2797.100**

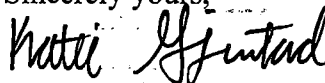
Dear Ms. Kitchings:

I have enclosed the original and seven (7) copies of the **RESPONDENT'S RETURN TO JAMES E. SMITH, JR.'S MOTION TO WITHDRAW AS COUNSEL OF RECORD** and a proof of service on counsel for the Appellants. Please stamp one copy and return it with our runner who will be waiting.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

With my kindest regards, I am

Sincerely yours,



Katie Gjennestad
Legal Assistant to Caitlin C. Heyward, Esq.

CCH/kg
Enclosures

cc: John Nichols, Esq.
Joel W. Collins, Jr., Esq.
Christian Stegmaier, Esq.
James Smith, Jr., Esq.
Rajinder Parmar