

STATE OF SOUTH CAROLINA)
)
 COUNTY OF FLORENCE)
)
 IN Re: Hannah J. Secka, individually and)
 as parent and guardian for the minor)
 M.Y.S.,)
)
 Plaintiffs,)
)
)
)
)
 vs.)
)
)
 FLORENCE COUNTY SCHOOL)
 DISTRICT ONE and FLORENCE)
 COUNTY SHERIFF'S DEPARTMENT,)
)
 Defendants.)
)
 _____)

IN THE COURT OF COMMON PLEAS
 TWELFTH JUDICIAL CIRCUIT
 CIVIL ACTION NO: 2021-CP-21-02121
 DARRYL C. CALDWELL'S MOTION
 TO WITHDRAW AS COUNSEL FOR
 PLAINTIFFS

YOU WILL PLEASE TAKE NOTICE that Counsel for Plaintiffs will move the Court for an order permitting withdrawal as counsel of record, in this case, pursuant to Rule 1.16(a)(3) of the South Carolina Rules of Professional Conduct (SCRPC), to wit: Plaintiffs have requested that counsel withdraws from his representation in this case. Consistent with Rule 407 of the Appellate Court Rules, and specifically, Rule 1.16(b) of the Rules of Professional Conduct, there is at least one ground that supports the permissive withdrawal of the undersigned counsel. Such grounds include *subpart (b) (7) "other good cause for withdrawal exist"*. Hannah J. Secka, who resides at 503 West Darlington Street, #B, Florence, South Carolina 29501, telephone number: (843) 407-8867, has requested that Darryl C. Caldwell, Esquire withdraw as counsel. Hannah J. Secka has elected to proceed in the case, *Pro Se.* by filing a Notice of Appeal on September 4, 2024, without the assistance, advice, or informing undersigned counsel. She requested that counsel

withdraw We are unable ethically to continue with our representation of Hanna J. Secka. Plaintiff Secka has discharged the Caldwell Law Firm, LLC.

Based on the foregoing, Counsel will respectfully request an Order of the Court permitting withdrawal as counsel of record.

Respectfully submitted,

/s/Darryl C. Caldwell
Darryl C. Caldwell, Esquire
Caldwell Law Firm, LLC
140 Wildewood Park Drive
Palmetto Suite 103,
Columbia, South Carolina 29223
(803) 542-0431 (O) / (803) 745-8263

September 13, 2024
Columbia, South Carolina

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 CERTIFICATE OF SERVICE

I, Darryl C. Caldwell, with the Caldwell Law Firm, LLC, the attorney representing the Plaintiffs do hereby certify that on this 13th day of September 2024, I served the below-named, **Motion to Withdraw as Counsel**, by USPS Priority Mail Express to the below-listed address:

Hannah J. Secka
503 West Darlington Street #B
Florence, South Carolina 29501

Moudou Yasen Secka
503 West Darlington Street #B
Florence, South Carolina 29501

/s/ Darryl C. Caldwell
 Darryl C. Caldwell, Esquire