

**RECEIVED**

**Sep 17 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

Appellate Case No. 2024-001454

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Florence County Case No. 2021-CP-21-02121

In Re: Hannah J. Secka,  
Individually and guardians for  
the Minor, M.Y.S.

Appellant

v.

Florence County School District  
One and Florence County Sheriff's  
Department

Respondents

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**NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL  
PURSUANT TO SCAR RULE 264 (b)**

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This Firm represents Hannah J. Secka, individually and as parent and guardian for a minor, M.Y.S. in a personal injury action against Florence County School District One and Florence County Sheriff's Department.

Appellant proceeding PRO SE filed a Notice of Appeal of the original order of the Honorable Judge Micheal G. Nettles entered on March 5, 2024, and the order from the motion for reconsideration filed on March 14, 2024, and entered on September 4, 2024.

The Appellant's attorney moves this 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 Hannah J. Secka. Appellant has discharged the Caldwell Law Firm, LLC.

Based upon the aforesaid reasons, we ask to be relieved as Counsel for the Appellant with respect to the appeal.

September 17, 2024

/s/ Darryl C. Caldwell  
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Attorney of Record for Appellants

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THE STATE OF SOUTH CAROLINA  
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APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

Micheal G. Nettles, Circuit Court Judge

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Case No. 2021-CP-21-02121

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In Re: Hannah J. Secka,  
Individually and guardian for  
the minor, M.Y.S.,

Appellants,

v.

Florence County School  
District One and Florence  
County Sheriff's Department,

Respondents.

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PROOF OF SERVICE

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I certify that I have on this date caused to be served a copy of the MOTION TO WITHDRAW AS LEGAL COUNSEL on the following counsel of record via Electronic Mail and first-class mail postage prepaid addressed to:

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Attorney for Respondent Florence County School Sheriff's Department

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September 17, 2024

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