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Oct 02 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Micheal G. Nettles, Circuit Court Judge

Case No. 2021-CP-21-02121

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.

PROOF OF SERVICE

I certify that I have on 2 October 2024 caused to be served a copy of the **MOTION TO WITHDRAW AS LEGAL COUNSEL** on Hannah J. Secka and Moudou Yassen Secka via first-class mail postage prepaid addressed to:

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

Moudou Yassen Secka
503 West Darlington Street #B
Florence, South Carolina 29051

/s/ Darryl C. Caldwell
Darryl C. Caldwell, Esquire
140 Wildewood Park Drive, Suite 103
Columbia, South Carolina 29223
(803) 542-0431
(803) 745-8263
dcaldwell@dcaldwelllawfirm.com

Attorney of Record for Appellant

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Sep 17 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Appellate Case No. 2024-001454

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

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

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
Darryl C. Caldwell, Esquire
140 Wildewood Park Drive, Suite 103
Columbia, South Carolina 29223
(803) 542-0431
(803) 745-8263
dcaldwell@dcaldwelllawfirm.com
Attorney of Record for Appellants

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PROOF OF SERVICE

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:

David T. Duff, Esquire
3700 Forest Drive #201
Columbia, South Carolina 29204
(803) 790-0603 (O)
(803) 790-0605 (F)
dduff@dfi-lawfirm.com

Attorney for Respondent Florence County School District One

Other Counsel of Record
David N. Lyons, Esquire
3700 Forest Drive #201
Columbia, South Carolina 29204
(803) 790-0603 (O)

(803) 790-0605 (F)
dlyon@dfi-lawfirm.com

Attorney for Respondent Florence County School District One

Other Counsel of Record:
Meredith L. Seibert, Esquire
3700 Forest Drive #201
Columbia, South Carolina 29204
(803) 790-0603 (O)
(803) 790-0605 (F)
mseibert@dfi-lawfirm.com

Attorney for Respondent Florence County School District One

Other Counsel of Record:
J. Scott Kozacki, Esquire
248 West Evans Street
Florence, South Carolina 29501
(843) 493-4330 (O)
(843) 662-1342 (F)
SKozacki@willcoxlaw.com

Attorney for Respondent Florence County School Sheriff's Department

Florence County Clerk of Court
181 N. Irby Street
Florence, South Carolina 29501
COC@florenceco.org

Honorable Micheal G. Nettles
Florence City-County Complex
180 N. Irby Street, Suite 3610
Florence, South Carolina 29501
mnettlessc@sccourts.org

September 17, 2024

/s/ Darryl C. Caldwell
Darryl C. Caldwell, Esquire
140 Wildewood Park Drive, Suite 103
Columbia, South Carolina 29223
(803) 542-0431
(803) 745-8263
dcaldwell@dcaldwelllawfirm.com

Attorney of Record for Appellant