

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

Charles M. Watson, Jr., Special Referee

Case No. 2025-000569

Rodney White, Appellant,

v.

Greenwood Mills, Inc., Respondent.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

NOW COMES Appellant, Rodney White, by and through his undersigned counsel,
respectfully moving for entry of an order extending the deadline to file Appellant's initial brief.

In support of this motion, the Appellant shows as follows:

1. This case began in 2003, when the parties entered into a sale/purchase contract for the property that is the subject of this dispute.
2. The Appellant made eight payments under the contract but then made no further payments, although he continued to occupy the property.
3. On April 30, 2021, the parties entered into a second sale/purchase contract, although unlike the first contract, the second did not involve owner financing, but rather required the Appellant to pay the full purchase amount by May 31, 2021.

RECEIVED

May 14 2025

SC Court of Appeals

4. When the Appellant did not make the payment, the Plaintiff informed him that it was rescinding the offer and subsequently brought suit. Appellant, who raised claims of adverse possession, continued to occupy and/or store items of personalty on the property and continues to do so to this day.
5. In July or August of 2022, while Appellant was not present, the Plaintiff had the home on the property demolished. Appellant then sought to recover the value of the items he lost as a result of the demolition.
6. On November 24, 2024, the Special Referee entered an order granting partial summary judgment in favor of the Plaintiff, ruling that the Appellant had no ownership or equitable interest in the property.
7. On February 21, 2025, the Special Referee entered a second order in which he ruled in favor of the Plaintiff on Appellant's counterclaims and denied the Plaintiff's motion to reconsider the November 24, 2024 order.
8. Appellant filed notice of appeal from both orders to this court.
9. Appellant's initial brief is currently due on May 19, 2025. However, undersigned counsel have a number of other matters leading up to and on that date, including numerous matters in federal court, a pending hearing in the Court of Common Pleas on May 22, 2025, and a hearing on multiple motions in a North Carolina Superior Court case set for May 19, 2025. The North Carolina case is an extraordinarily complex case involving complex and novel legal issues and dense, voluminous facts involving medical, surgical, and products liability issues.

10. As such, the Appellant respectfully asks that this court enter an order extending the deadline for the Appellant's initial brief by 30 days, so that his counsel may have adequate time to properly prepare the brief.

11. No previous motions to extend the deadline have been made.

WHEREFORE, the Appellant respectfully moves for entry of an order extending the deadline to file his initial brief on appeal by 30 days, up to and including the 18th of June, 2025.

Respectfully submitted

/s/Ryan McKaig

Ryan McKaig

(104026)

Aaron

Wallace

(100255)

Wallace Law

Firm

1416 Laurel

Street, Suite B

Columbia, South Carolina 29201

(803) 766-3997

Attorneys for Appellant

May 14, 2025
Columbia, South Carolina

