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Jul 30 2025

SC Court of Appeals

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

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AUG 07 2025

SC Court of Appeals

Greenville Mills, Inc.,

Respondent,

v.

Rodney White.,

Appellant.

105452

MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT, MOTION TO  
WITHDRAW APPELLANT'S INITIAL BRIEF, AND MOTION TO ALLOW  
APPELLANT A REASONABLE AMOUNT OF TIME TO FILE HIS OWN  
BRIEF

NOW COMES the undersigned counsel for Appellant moving for entry of an order allowing both counsel of record for the Appellant to withdraw as counsel, allowing the Appellant to withdraw the initial brief and designation of record filed on his behalf by the movants, and allowing the Appellant a reasonable period of time to file or have filed a substitute brief and designation. In support of this motion, the undersigned counsel shows as follows:

1. The undersigned counsel for Appellant, Ryan McKaig and Aaron Wallace, have represented Appellant during the pendency of this appeal.
2. A situation has arisen that continued representation under the circumstances has been rendered impossible. Therefore, the undersigned respectfully ask that this Court enter an order allowing them to be relieved as counsel.
3. The undersigned have communicated to their client that they intend to move to be relieved as counsel. The Appellant has stated that he does not consent to his attorneys withdrawing and stated that he wants this Court to conduct a hearing so that he may express his reasons for opposing their withdrawal.

4. The undersigned have provided the Plaintiff with a copy of this motion and have informed him of his right to respond to it by contacting the Court at the following address, email address, and telephone number:

Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Phone: (803) 734-1890

5. The Appellant has asked that the initial brief and designation of record filed by the undersigned be withdrawn.
6. The undersigned do not know what Plaintiff's plans are regarding obtaining new counsel or proceeding otherwise in the filing of a substituted brief and designation of record, but given the circumstances, the undersigned respectfully ask that in allowing their motion to withdraw as counsel, the Court provide Plaintiff with adequate time to secure new counsel to file any substituted brief and designation of record he plans to have filed or plans to file himself.
7. The undersigned has consulted with counsel for the Respondent, who does not object to this Court allowing the undersigned counsel to be relieved and attorneys of record in this case. However, he stated that he opposes any delays in the litigation.

WHEREFORE, the undersigned counsel move to withdraw as attorneys of record for the Appellant, move for withdrawal of the initial brief and designation of record filed on Appellant's behalf on July 21, 2025, and move for Appellant to be given reasonable time to draft and submit a substitute initial brief and designation of record of his own, or to have a substitute brief and designation of record filed on his behalf by any future counsel he may choose to retain.

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

July 30, 2025  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
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Appellant.

PROOF OF SERVICE OF MOTION ON APPELLANT

The undersigned hereby certify that they served the previously filed motion to withdraw as counsel on their client by e-mail, for which he acknowledged receipt, and have served him at his address located at 341 Maxwell Ave., Greenwood, SC 29646 by placing a copy in the first class mail, postage pre-paid.

Respectfully submitted

/s/Ryan McKaig  
Ryan McKaig  
(104026)  
Aaron  
Wallace  
(100255)  
Wallace Law  
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1416 Laurel

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Columbia, South Carolina 29201  
(803) 766-3997  
Attorneys for Appellant

August 4, 2025  
Columbia, South Carolina