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OCT 24 2025

SC Court of Appeals

## IN THE SOUTH CAROLINA COURT OF APPEALS

Rodney White, Appellant

v.

Greenwood Mills, Inc., Respondent

Case No.: 2025-000569

### MOTION FOR EXTENSION OF TIME TO RETAIN COUNSEL AND FOR COURT INTERVENTION IN THE INTEREST OF JUSTICE

TO: The Honorable Judges of the South Carolina Court of Appeals

#### INTRODUCTION

Comes now the Appellant, *Rodney White*, proceeding **pro se**, and respectfully moves this Honorable Court for a **sixty (60)-day extension** of time to retain new appellate counsel and to file any corrective or supplemental filings necessary to ensure a fair appellate review.

This motion is made pursuant to **Rule 263, South Carolina Appellate Court Rules**, and the Court's **inherent authority to protect the integrity of its proceedings** and prevent manifest injustice.

#### GROUND FOR RELIEF

1. **Immediate Withdrawal of Appellate Counsel:**

Appellant's appellate attorneys, Aaron Wallace and Ryan McKaig, **withdrew immediately after filing** the Initial Brief and Designation of Matter—within hours of submission—on or about **July 22, 2025**.

This withdrawal occurred at a critical stage of the appeal, leaving Appellant unrepresented and without an opportunity to review or approve filings made on his behalf. This immediate withdrawal warrants a hearing to determine appellate counsel reason withdrawal I feel abandoned and left to proceed with the appeal process all over at this critical stage.

2. **Undue Burden and Financial Hardship:**

Appellant paid **substantial fees** in full for appellate representation, including preparation of the Initial Brief and record designation. Because counsel withdrew abruptly, Appellant is now forced to **pay duplicative fees** to new counsel who must review the entire record, including transcripts, depositions, pleadings, and orders already in the appellate file. I retained my appellate counsel's in good faith withdrawal at this stage rendered my appeal in vain.

3. **Irreparable Prejudice:**

The abrupt withdrawal caused severe prejudice and delay. Appellant's ability to obtain effective appellate review has been hindered, and the costs of replacing counsel and re-reviewing the record impose an **undue financial and emotional burden**. Without additional time, Appellant will be deprived of a fair opportunity to present his case and rendered the appeal in vain.

**4. Efforts to Retain New Counsel:**

Since the withdrawal, Appellant has made diligent efforts to secure new counsel. However, due to the case's complexity, extensive record, attorneys conflicts of interest, and overlapping misconduct issues, additional time is required for any new attorney to review the materials and enter a proper appearance.

**5. Good Faith and Judicial Integrity:**

This motion is made in **good faith**, not for delay. Appellant seeks only to preserve his rights and to ensure that the appeal is decided on a complete and accurate record. Given the unique circumstances—including alleged misconduct and wrongful eviction occurring during this appeal—Appellant respectfully requests the Court to exercise its **inherent authority** to prevent a miscarriage of justice.

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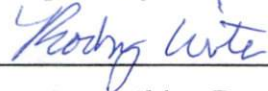
**PRAYER FOR RELIEF**

WHEREFORE, Appellant respectfully prays that this Honorable Court:

1. **Grant a sixty (60)-day extension** of time for Appellant to retain counsel and make any necessary filings to correct or supplement the appellate record;
2. **Review and, if appropriate, hold a hearing to inquire into** the circumstances surrounding appellate counsel's withdrawal and its impact on Appellant's rights;
3. **Exercise its inherent authority** to ensure the integrity of the appellate process and prevent manifest injustice; and
4. Grant such other and further relief as this Court deems just and proper.

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Respectfully submitted,



Rodney White, Pro Se  
Appellant  
341 Maxwell Ave Greenwood Sc

[Numberoneauto2@gmail.com](mailto:Numberoneauto2@gmail.com)

**Date:** October 23, 2025

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**AFFIDAVIT IN SUPPORT OF MOTION**

STATE OF SOUTH CAROLINA  
COUNTY OF [Your County]

Personally appeared before me the undersigned, who being duly sworn, deposes and states as follows:

1. I am the Appellant in the above-captioned case.
2. My appellate attorneys, Aaron Wallace and Ryan McKaig, sent me the initial brief at 10:47 pm and filed the Initial Brief and Designation of Matter at 11:17pm just before the midnight deadline on **July 21, 2025**, I stated in a email that this was unacceptable, they **withdrew the following morning**, on **July 22, 2025**, without prior notice or opportunity for me to review the filings.
3. I paid both attorneys in full for appellate services, including the preparation of motions, briefs, and transcript review. Their withdrawal has forced me to pay **duplicate fees** for work already completed.
4. The withdrawal has caused me **severe financial hardship and undue burden**. I have spent thousands of dollars on this case and now face additional costs to retain new counsel to review extensive

- materials including hearing transcripts, deposition testimony, and the record on appeal.
5. The sudden withdrawal has caused **irreparable harm** by leaving me without legal representation during a critical stage of the appellate process.
  6. I am acting in **good faith** to secure new representation and to ensure that the appellate process is fair, complete, and just.
  7. I respectfully ask the Court to grant a sixty-day extension and to take any steps it deems appropriate to protect the integrity of this appeal.

**FURTHER AFFIANT SAYETH NOT.**

*Rodney White*

**Rodney White**

Sworn to and subscribed before me this 24<sup>th</sup> day of October 2025

*Selenia Sadai*

Notary Public for South Carolina

My Commission Expires: 4/30/2028



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## CONCLUSION AND PRAYER FOR RELIEF

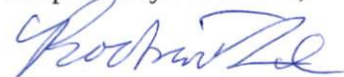
For the foregoing reasons, Appellant respectfully requests that this Honorable Court exercise its supervisory and inherent authority to intervene in the interest of justice. The Appellant has suffered irreparable harm, financial hardship, and the loss of due process as a result of counsel's immediate withdrawal at a critical stage of the appeal, coupled with the wrongful eviction and misconduct of opposing counsel and the lower court.

Appellant has already paid substantial fees for appellate preparation and briefing, which were filed without his review and immediately followed by counsel's withdrawal. The circumstances have placed the Appellant in an impossible position—facing duplicative costs, limited access to the record, and the burden of securing new counsel to review transcripts, deposition testimony, and missing filings necessary for a fair appeal.

In light of these extraordinary circumstances, and to preserve the integrity of this appeal and the judicial process, the Appellant respectfully **prays that this Honorable Court:**

1. **Grant a sixty (60) day extension of time** to retain new appellate counsel and review the record in full;
2. **Hold an evidentiary hearing** or other appropriate inquiry into the misconduct, collusion, and wrongful eviction that occurred during the pendency of this appeal;
3. **Exercise its inherent supervisory power** under Rules 240 and 260, SCACR, and Article V, § 5 of the South Carolina Constitution to ensure the impartial administration of justice;
4. **Vacate, reverse, or remand** the underlying judgment to a jurisdiction free from conflict of interest and undue influence, should the evidence confirm violations of due process and fairness; and
5. **Grant such other and further relief** as this Court deems just, proper, and necessary to protect the integrity of the appellate process and prevent a miscarriage of justice.

Respectfully submitted,



**Rodney White, Pro Se**

Appellant

341 Maxwell Ave Greenwood Sc

[Numberoneauto2@gmail.com](mailto:Numberoneauto2@gmail.com)

Dated: 10-23-2025

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM Greenwood COUNTY  
Court of Common Pleas

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OCT 24 2025

SC Court of Appeals

\_\_\_\_\_, Circuit Court Judge

Case No. \_\_\_\_\_ - CP - \_\_\_\_\_

Rodney White 2025-000569

Appellant/Respondent,

v.

Greenwood mills Inc

Appellant/Respondent.

PROOF OF SERVICE

I certify that I have served the motion ext on Brandon Smith by depositing  
(Document) (Name)  
a copy of it in the United States Mail, postage prepaid, on 10-24-25, addressed to,  
(Date)  
104 Maxwell Ave (29646) Post Office Box 1810  
Greenwood SC 29648

Date: 10-24-25

s/ Rodney White  
Address: 341 Maxwell Ave  
Greenwood SC 29646