

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**Oct 31 2025**

**SC Court of Appeals**

APPEAL FROM GREENWOOD COUNTY  
Court of Common Pleas

Charles M. Watson, Jr., Special Referee

Case No. 2025-000569

Greenwood Mills, Inc..... Respondent,

v.

Rodney White,..... Appellant.

MOTION TO RECONSIDER AND DISMISS

NOW COMES Respondent, Greenwood Mills, Inc., by and through its undersigned counsel, respectfully moving: (1) to reconsider the Court’s October 27, 2025 order granting Appellant an additional thirty (30) days to file his initial brief and designation of record and (2) for entry of an order dismissing Appellant’s appeal. In support of this motion, Respondent shows as follows:

1. Appellant, through his counsel at the time, filed his Notice of Appeal on March 21, 2025.
2. After seeking and receiving an extension of time to order the transcript, Appellant, through his counsel at the time, moved on May 15, 2025 for an extension of thirty (30) days to file his initial brief. The Court granted Appellant and additional thirty (30) days to file his initial brief and designation of matter the same day.

3. Appellant, through his counsel at the time, moved for another extension to file his initial brief on June 19, 2025. This time, Appellant requested an additional three (3) days. The Court granted Appellant an additional thirty (30) days for filing of the initial brief and designation of matter. In its order, the Court stated, “[n]o further extensions will be granted absent extraordinary circumstances.”
4. On July 21, 2025, Appellant, through his counsel at the time, filed his initial brief and designation of matter.
5. Nine (9) days later, Appellant’s counsel filed a motion to withdraw as counsel and, at Appellant’s request, a motion to withdraw Appellant’s initial brief and designation of record. Respondent indicated its consent to Appellant counsel’s withdrawal as counsel as long no additional delays in the matter resulted. After curing deficiencies in the filing, the Court on August 18, 2025 granted both motions and gave Appellant thirty (30) days to retain new counsel or be deemed proceeding pro se.
6. After receiving no notice of appearance by new counsel on behalf of Appellant, the Court informed Appellant of his pro se status and granted an additional thirty (30) days from September 23, 2025 to file his initial brief and designation of record.
7. After the expiration of those thirty (30) days, the pro se Appellant filed a motion requesting, among other things, a sixty (60) day extension of time to “make necessary filings to correct or supplement the appellate record.”<sup>1</sup> The Court responded by granting Appellant another extension until November 24, 2025 to file his initial brief and designation of record.

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<sup>1</sup> The Court’s case management system incorrectly labels this October 24, 2025 filing as Appellant’s first motion for an extension of time.

8. Appellant failed to file timely his initial brief and designation of record within the generous periods provided by the Court. As such, the Court should dismiss Appellant's appeal.
9. Even if the Court were, for some reason, to recognize Appellant's most recent untimely extension request, Appellant provided no evidence of extraordinary circumstances supporting yet another extension of time. In fact, the record only details how Appellant's own actions with regard to his multiple counsels of record have resulted in repeated delays and Appellant's own withdrawal of his initial brief and designation of record previously filed with the Court on his behalf.

WHEREFORE, Respondent respectfully moves to reconsider its October 27, 2025 order and for entry of an order dismissing Appellant's appeal.

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October 31, 2025