

IN THE COURT OF APPEALS OF SOUTH CAROLINA

Case No. 2025-000569

Greenwood Mills, Inc.,

Respondent,

v.

Rodney White,

Appellant.

RECEIVED

NOV 04 2025

SC Court of Appeals

APPELLANT'S RESPONSE IN OPPOSITION TO RESPONDENT'S MOTION TO RECONSIDER AND DISMISS

INTRODUCTION

NOW COMES the Appellant, **Rodney White**, proceeding *pro se*, respectfully submitting this Response in Opposition to Respondent's "Motion to Reconsider and Dismiss" filed on **October 31, 2025**. The Respondent's motion misstates the procedural history, disregards extraordinary circumstances that were fully set forth in Appellant's prior filings, and seeks to unfairly terminate this appeal before the merits can be heard.

Dismissal at this stage would result in a **manifest injustice** and would effectively reward the Respondent for misconduct and delay tactics that have prejudiced Appellant's ability to secure counsel and prepare his filings.

I. THE APPELLATE COURT PROPERLY GRANTED EXTENSIONS DUE TO EXTRAORDINARY CIRCUMSTANCES

The Court's October 27, 2025 Order granting Appellant additional time was based on extraordinary and well-documented circumstances:

1. The **immediate withdrawal** of Appellant's appellate counsel, **Aaron Wallace and Ryan McKaig, the morning after filing the Initial Brief and Designation of Matter** on July 21, 2025.
2. Counsel's withdrawal was **without adequate notice, after full payment, and at a critical stage** of the appeal.
3. Appellant was left without representation in a complex appeal involving **over four years of litigation**, including misconduct and missing transcripts (Nov. 6, 2024 and Nov. 27, 2024 hearings). And mischaracterizations the final order as a hearing transcript.

Appellant promptly notified the Court and requested time to secure new counsel and correct the record—requests that were made in **good faith** and supported by evidence.

II. APPELLANT’S EXTENSION REQUESTS WERE NOT DELAY TACTICS BUT NECESSARY TO PROTECT DUE PROCESS RIGHTS

The Respondent incorrectly suggests that Appellant’s requests were repetitive or dilatory. In truth, each motion for extension was necessitated by:

- **Counsel misconduct** and abandonment after being fully compensated;
- **Erroneous filings** by prior counsel that misrepresented the record; and
- **The need to correct or supplement missing portions** of the record critical to the appeal (including transcripts and exhibits omitted by counsel).
- As stated by the Respondent’s counsel my appellate counsel’s requested multiple extensions and made a request for only 3 days to finalize the initial brief and specified that no further extensions will be necessary, but this Honorable Court granted 30 days yet they strategically waited minutes before the deadline to send it to me I had no meaningful time to review.
- I had repeatedly requested to review the brief before filing, but they sent it to me at 10:47 pm they filed it at 11:17 pm just minutes before the midnight deadline, the following morning they informed me they would be withdrawing from representation.
- Even though only 3 days were requested on the second extension June 19, 2025 30 days were granted the Respondent counsel made no inquiries into this. Even when ask by Appellant’s counsel Ryan McKaig "Do you have any objection to me getting a extension until Monday?".
- There was no response nor did the Respondent ask for an Explanation or file a motion opposing the additional time.
- The first extension request on May 15 2025 contains language that was included in the initial brief so the Respondent had an un fair advantage, this was strategically done by my appellate counsel’s.
- The initial brief and Designation of Matter aligned with the Respondent’s narrative this was a deliberate action.
- The Respondent never opposed any extension by my Appellate counsel’s nor did the Respondent oppose the courts granting 30 days when only 3 days were requested.
- As was stated by the Respondents "he didn't oppose counsel withdrawal as long as no additional delays in the matter resulted".
- The withdrawal came without warning or justification at a critical stage of the appeal I was abandoned and left to proceed unrepresented additional delays where inevitable.

The appellate court possesses **inherent authority** to ensure the integrity of the record and the fairness of the proceedings. See *State v. Needs*, 333 S.C. 134, 508 S.E.2d 857 (1998) (recognizing courts’ inherent power to protect the integrity of the judicial process).

III. RESPONDENT’S MOTION IS AN ATTEMPT TO AVOID MERITS REVIEW AND CONCEAL FRAUDULENT FILINGS

The record demonstrates that the underlying judgment was tainted by:

- A **fraudulent “breach letter”** and **termination letter** that the seller **Jay Self testified under oath he never sent nor authorized**;
- **Conflict of interest** involving Respondent’s counsel **Brandon Smith**, who acted as **negotiator, witness, and later litigator** of the same contract in dispute while also serving as **registered agent** for related entities and **mayor of Greenwood**;

- **Special Referee Charles Watson's partial summary judgment** issued after ex parte communications and denial of Appellant's jury trial and continuance requests; and
- **Wrongful eviction and demolition of Appellant's property** while the matter was pending appeal.

Given this context, Respondent's motion to dismiss—premised solely on procedural timing—amounts to an effort to obstruct review of serious **due process violations and attorney misconduct**.

IV. EQUITY AND JUSTICE REQUIRE THAT THE APPEAL BE HEARD ON ITS MERITS

South Carolina courts consistently hold that appeals should be determined on their merits whenever possible. See *Goodson v. American Bankers Ins. Co.*, 295 S.C. 400, 368 S.E.2d 687 (Ct. App. 1988). The Court has broad discretion to permit filings where delay results from extraordinary circumstances, especially where dismissal would cause manifest injustice.


Appellant has diligently sought to comply with every directive and has demonstrated good faith at all stages. The Respondent has shown no prejudice that would justify dismissal.

CONCLUSION

For the foregoing reasons, Appellant respectfully requests that this Honorable Court:

1. **DENY** Respondent's Motion to Reconsider and Dismiss;
 2. **AFFIRM** the Court's prior Order granting Appellant time to complete and file the corrected Initial Brief and Designation of Matter;
 3. **ALLOW** Appellant reasonable additional time to finalize his filings if necessary; hold a hearing and investigation into this matter.
 4. **GRANT such other relief** as this Court deems just and proper in the interests of justice.
-

Respectfully submitted,



Rodney White
341 Maxwell Ave Greenwood Sc

Numberoneauto2@gmail.com

Date: 11-3 25

**STATE OF SOUTH CAROLINA
COURT OF APPEALS**

Greenwood Mills, Inc. v. Rodney White
Case No. 2025-000569

AFFIDAVIT OF RODNEY WHITE

I, **Rodney White**, being duly sworn, hereby state as follows:

1. Background

I am the Appellant in this matter. I submit this affidavit in support of my **Opposition to Respondent's Motion to Reconsider and Dismiss**, and to verify the extraordinary circumstances that required extensions of time. This affidavit also documents the prejudice caused by appellate counsel's conduct and the broader due-process violations that have tainted this case.

2. Counsel Withdrawal & Prejudice

1. My appellate counsel, **Aaron Wallace** and **Ryan McKaig**, filed the *Initial Brief and Designation of Matter* late on the night of **July 21, 2025**.
 2. On the morning of **July 22, 2025**, they notified me of their immediate intent to withdraw.
 3. I had fully paid counsel, including additional charges for transcript designations, and relied on them to protect my rights and ensure compliance with appellate rules.
 4. Their **sudden withdrawal immediately after filing** critical appellate documents left me unrepresented at the most critical stage of my appeal, causing **severe prejudice** and financial hardship.
 5. This withdrawal occurred **without adequate notice or justification**, depriving me of the opportunity to correct errors or supplement the record.
-

3. Incomplete & Misleading Record

6. The *Initial Designation of Matter* omitted **key hearing transcripts**, including the **November 6, 2024** hearing (Partial Summary Judgment) and the **November 27, 2024** hearing (Final Determinations).
 7. It also mischaracterized the **February 21, 2025 Final Order** as a hearing transcript, while excluding evidence and filings essential to my appeal.
 8. Additional materials—such as my **Motion to Stay**, supporting exhibits, correspondence, and objections—were omitted entirely, creating an incomplete and misleading record that distorts the true procedural posture of this appeal.
-

4. Attorney Misconduct & Procedural Abuse

9. The handling of this case has been tainted by misconduct and procedural abuse.
 - o The Special Referee, **Charles M. Watson Jr.**, proceeded without ensuring proper notice or consent to his appointment.
 - o Plaintiff's counsel, **Brandon Smith**, communicated privately with the Special Referee, scheduling hearings without my input or acknowledgment, and was permitted to suggest summary judgment.
 - o My appellate counsel's failure to challenge these irregularities and their agreement with the Respondent's narrative in the brief demonstrate a **failure of duty and impartiality**.
-

5. Wrongful Evictions & Misuse of Rule 60

10. While the case was still pending, the **residential property was wrongfully demolished** in 2022, and I was **wrongfully evicted again in April 2025** during the appeal.
 11. These actions were later followed by attempts to **misuse Rule 60** to legitimize or conceal the wrongful eviction and destruction of property.
 12. My appellate counsel was aware of these violations but failed to raise or preserve them, compounding the prejudice and loss suffered.
-

6. Good Faith & Diligence

13. I have acted in **good faith** throughout these proceedings, filing timely extension requests and diligently preserving the record.
 14. I have continuously sought to retain new counsel, compile transcripts, and prepare accurate filings despite severe financial and procedural hardship.
 15. I simply seek a fair opportunity for my appeal to be heard **on the merits** rather than dismissed due to the misconduct of others.
-

7. Justice Requires Review

16. The underlying case involves:
 - A **fraudulent breach letter** and a non-existent **termination letter** that the seller, **Jay Self**, testified under oath he **never sent nor authorized anyone to send**.
 - A **2021 contract** signed under **duress and misrepresentation** following threats of eviction by the Plaintiff's attorney.
 - The Respondent's attorney **acting as contract drafter, witness, opposing counsel, and current city mayor**, creating a direct conflict of interest.
 - **Wrongful evictions** while the case was active and again while under appeal.
 - **Serious due-process violations** and **collusion between counsel and tribunal** that undermine public confidence in the judicial process.
 17. If this appeal is dismissed without review, these acts of **misconduct, wrongful eviction, and fraudulent filings** will remain unaddressed, resulting in a miscarriage of justice.
-

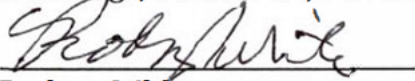
8. Relief Requested

18. I respectfully request that the Court:

- Take judicial notice of the extraordinary circumstances described herein;
- Grant appropriate relief, including hold a hearing or investigation into the fraudulent documents and attorney misconduct.
- In the alternative Report this matter to the appropriate oversight agencies.
- Consider my **timely and good-faith efforts** to comply with all procedural requirements; and
- Ensure this matter is fully and fairly reviewed **on its merits**.

AFFIANT'S DECLARATION

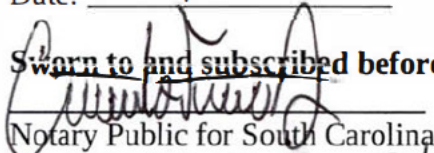
I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.



Rodney White
Appellant, *Pro Se*

Date: 11-4-25

~~Sworn to and subscribed~~ before me this 4 day of November, 2025.


Notary Public for South Carolina

My Commission Expires: 3/19/2034



STATE OF SOUTH CAROLINA

COURT OF APPEALS

Greenwood Mills, Inc.,

Respondent,

v.

Rodney White,

Appellant.

Case No. 2025-000569

AFFIDAVIT OF RODNEY WHITE IN SUPPORT OF OPPOSITION TO RESPONDENT'S MOTION TO RECONSIDER AND DISMISS

Personally Appeared Rodney White, who, being duly sworn, deposes and states as follows:

I. BACKGROUND AND GOOD-FAITH PARTICIPATION

1. I am the Appellant in the above-captioned matter and submit this affidavit in opposition to the Respondent's Motion to Reconsider and Dismiss, and in support of my continued right to pursue this appeal on its merits.
2. I have acted in **good faith** throughout this case, despite being faced with repeated misconduct, attorney abandonment, and due process violations that have made it difficult to secure representation and ensure a fair review of my case. Due to the immediate withdrawal of appellate counsel at a critical stage, conflicts of interest with the parties and former Attorney's that have been involved in this case compiled with the financial burden of paying for duplicative work already paid for.
3. The underlying lawsuit was **initiated based on false and fraudulent documents**—including a breach and termination letter that the seller, **Jay Self**, testified under oath that **he never sent nor authorized anyone to send**.
4. The Respondent's attorney, **Brandon Smith**, **drafted, altered, and negotiated the 2021 contract**, signed it as a **witness**, and later **litigated** that same contract on behalf of his client. He is also the **registered agent** for a related entity, Greenwood Development, and currently serves as **mayor of Greenwood**, where this case was tried. His dual roles create serious conflicts of interest that have tainted these proceedings.
5. I met with Brandon Smith about the 2021 contract he negotiated and altered and initialed the changes, he told me he would take the changes to Jay Self (the seller) for his approval, the next day Brandon

Smith notified me by email, that his client didn't approval it, relying on Mr Smith word that Jay Self didn't approve it, I signed a revised version of the 2021 contact under duress and threats of eviction, it was revealed years later in the deposition of Jay Self that he never discussed these changes with His attorney Mr Smith, and he never saw the contract and didn't know it existed, this misrepresentation by Mr Smith alone with the threats of eviction lead me to sign the revised 2021 contract under duress had I known this before hand I would have never entered into the revised contrat, this action by Mr Smith constitute misconduct, fraud and bad faith. The 2021 contract should have be voided on fraudulent misrepresentation, fraud inducement.

II. ATTORNEY MISCONDUCT, WITHDRAWAL, AND PROCEDURAL HARDSHIP

5. (a) On **July 21, 2025**, my appellate attorneys, **Aaron Wallace and Ryan McKaig**, filed an Initial Brief and Designation of Matter **minutes before midnight**. As stated by the Respondents my appellate counsel's requested multiple extensions and made a request for only 3 days to finalize the initial brief, this Honorable Court granted 30 days yet they strategically waited minutes before the deadline to send it to me I had no meaningful time to review.
 - o I had repeatedly requested to review the brief before filing, but they sent it to me at 10:47 pm they filed it **30 minutes later at 11:17 just 43 minutes before the deadline**.
 - o The following morning, **July 22, 2025**, they notified me that they were withdrawing from representation.
 - o Even though only 3 days were request 30 days were granted the Respondent made no inquiries into this even when ask by Appellant's counsel Ryan McKaig "Do you have any objection to me getting an extension until Monday"?
 - o There was no response nor did the Respondent ask for a Explanation or file a motion opposing the extra time, the frist extension request on May 15 2025, contains similar language that was included in the initial brief so the Respondent had a early advantage, this was strategically done by my Appellate counsel's.
 5. The initial brief and Designation of Matter aligned with Respondent's narrative this was a deliberate action. Respondent never oppose any extension by my Appellate counsel, nor did the Respondent oppose the court granting 30 days when only 3 days were requested as was stated in the motion filed by Respondent.
 6. Their withdrawal came **without warning or justification**, at a **critical stage of the appeal**, and immediately after receiving full payment for their services.
 7. The Initial Brief they filed was **defective and misleading**. It omitted essential transcripts (including **November 6 and November 27, 2024 hearings**), mischaracterized the **February 21, 2025 final order** as a "hearing transcript," and failed to raise key due-process and equitable issues that form the foundation of my appeal, my Appellate counsel's also admitted to me they intended to "muddy the waters" in the appeal.
 8. As a result of their withdrawal, I was forced to proceed *pro se*, incurring additional expenses and facing **duplicative costs** to have a new attorney review and correct the record—work I had already paid for.
 9. I immediately notified the Court, explained these extraordinary circumstances, and requested extensions to correct and supplement the record. Each request was **made in good faith** and supported by evidence.
-

III. WRONGFUL EVICTION, DUE PROCESS VIOLATIONS, AND CONTINUING HARM

10. While this case was pending in the lower court, my **residential property was demolished without a lawful order**.
Later, while this appeal was pending, I was **wrongfully evicted** from the commercial property despite a pending appeal and motions before the court.
11. These acts were carried out **without proper authority**, in coordination between the Plaintiff's attorney after the unsuccessful attempt to use Rule 60 the plaintiffs attorney went to the Magistrate Court to get a writ of ejection, this was after performing and illegally wrongful eviction, the magistrate court granted this writ, after I questioned the magistrate court about this while my case is pending appeal they stayed the order.
12. When I sought help from my appellate counsel to protect my rights during this time, they failed to act, failed to inform me of critical communications (including a February 21, 2025 "voluntary vacate" email from opposing counsel), and later attempted to **cover up** the wrongful eviction through procedural filings. My appellate counsel's willfully collision with the plaintiff and Special Referee to misuse use Rule 60 to amend the final order to add a provision for eviction the Special Referee "stated rule 60 was rather steep" but he would allow it if all parties consented, I objected to the use of rule 60, it was later stated in the initial brief filed by my Appellate counsel that the courts didn't allow it, this was a false statement.
13. The **Special Referee, Charles Watson**, also acted improperly by:
 - Proceeding with hearings without ensuring I received notice;
 - Asking the Respondent's attorney if he wished to file a summary-judgment motion in an email exchange with the plaintiffs attorney, and proceeded to schedule a hearing in anticipation that I would not be present.
 - The Special Referee conduct was not that of an impartial tribunal.
 - Denying a continuance request after my aunt's death 2 days before the scheduled hearing; and my counsel being retained 4 days prior.
 - Failure to rule on properly filed motions (1) opposition to summary judgment, (2) motion for jury trail.
 - Going against the Honorable Eugene Griffith order for full hearing on the merits
 - By bifurcating the case and granting summary judgment, the hearing on my counterclaims would have no merit, because it deem me as a trespasser, this can be proven by the special referee own words in his final order he states "I granted summary judgment to the plaintiff finding that the plaintiff owned fee simple title to the property in question and the defendant did not have any legal or equitable interest in the property.
 - The special referee error in partial summary judgment order, the record and pleadings clearly shows there where genuine disputes of material facts the special referee even makes reference to this in his order granting partial summary judgment. Stating " There are disputes about who did what under the 2003 contract" " I find those issues to be immaterial to the ultimate issue in this case".
 - The Special Referee Issuing rulings that disregarded evidence and equitable rights under the 2003 contract, which is the foundation of this case and the soley contract that the complaint was filed on, before plaintiff amended his complaint.

IV. EXTRAORDINARY CIRCUMSTANCES JUSTIFYING EXTENSIONS

14. These cumulative events—fraudulent filings, conflicts of interest, wrongful evictions, and attorney abandonment—constitute **extraordinary circumstances** under South Carolina Appellate Court Rule

263(b) and established case law.

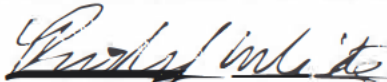
15. My requests for extensions were **not for delay**, but necessary to correct the record, obtain missing transcripts, and preserve my right to due process.
16. I have made every effort to comply with the Court's deadlines and orders while navigating extreme hardship, financial strain, and emotional distress caused by these events.
17. Dismissing this appeal on procedural grounds would deny me any meaningful review of **serious legal and ethical violations**, cause irreparable harm, and undermine public confidence in the judicial process.

V. REQUEST FOR RELIEF

18. I respectfully ask this Honorable Court to:

- **Deny** Respondent's Motion to Reconsider and Dismiss;
- **Uphold** its prior Order granting additional time for my filings;
- **Allow** reasonable additional time to complete the corrected record and supplemental filings; holding a hearing or investigation into the immediate withdrawal of appellate counsel and the misconduct while the appeal is pending. And the filing of a frivolous lawsuit by the plaintiff that was based on a fraudulent letter.
- **Ensure this case is reviewed on the merits** to preserve the integrity of the appellate process.

FURTHER AFFIANT SAYETH NOT.

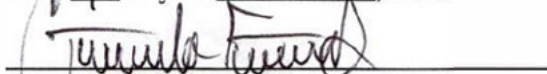


Rodney White, Appellant

Date: 11-4-25

Sworn to and subscribed before me

This 4 day of November, 2025



Notary Public for South Carolina

My Commission Expires: 3/19/2034

(Seal)



RECEIVED

May 15 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

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.

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

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Jun 19 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. 2021-CP-24-784

Greenwood Mills, Inc.,

Respondent,

v.

Rodney White,

Appellant.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellant Rodney White respectfully moves for a three day extension of time to file his initial brief. The Court previously granted a 30-day extension and the brief is currently due tomorrow, June 20, 2025. However, the undersigned has had a tremendously busy schedule over the past two weeks, with numerous court appearances and briefing deadlines in a large number of federal and state cases. He therefore requests the weekend to finalize Mr. White's brief. No further extensions will be necessary.

WHEREFORE, the undersigned respectfully requests that this Court enter an order extending the deadline to file the Appellant's brief, up to and including the 23rd day of June, 2025.

June 19, 2025

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

Other Counsel of Record:
Brandon A. Smith
Attorney for
Plaintiff/Respondent
104 Maxwell Ave.
Greenwood, South Carolina 29646
(864) 229-4076
Attorney for Respondent

From: [Ryan Mckaig](#)
To: [Court Of Appeals Filings; Brandon Smith](#)
Subject: Re: Greenwood Mills v. White motion for extension
Date: Thursday, June 19, 2025 8:48:54 PM

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Ms Smith,

Do you have any objection to me getting an extension until Monday?

Ryan

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Thursday, June 19, 2025 2:44 PM
To: Ryan Mckaig <ryan@mckaiglaw.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>; Brandon Smith <bsmith@basmithlaw.com>
Subject: RE: Greenwood Mills v. White motion for extension

From: Ryan Mckaig <ryan@mckaiglaw.com>
Sent: Thursday, June 19, 2025 2:32 PM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Brandon Smith <bsmith@basmithlaw.com>
Subject: Greenwood Mills v. White motion for extension

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

From: Ryan McKaig <outlook_4CABC4785F8F72F5@outlook.com>
Sent: Thursday, June 19, 2025 2:30 PM
To: Ryan Mckaig <ryan@mckaiglaw.com>
Subject:

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



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**Brief**

1 message

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**Aaron Wallace** <awallace@wallacefirmssc.com>  
To: Rodney White <numberoneauto2@gmail.com>  
Cc: Ryan Mckaig <ryan@mckaiglaw.com>


Mon, Jul 21, 2025 at 10:47 PM

Dear Rodney:

Please see enclosed.

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
[www.wallacefirmssc.com](http://www.wallacefirmssc.com)

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 **White initial brief.pdf**  
211 KB



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RESPONSE TO THE INTIAL BRIEF AND THE TIME IN WHICH IT WAS SENT.

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1 message

**Rodney White** <numberoneauto2@gmail.com>

Mon, Jul 21, 2025 at 11:39 P

To: Aaron Wallace <awallace@wallacefirmssc.com>, Ryan Mckaig <rmckaig@wallacefirmssc.com>, Ryan Mckaig <ryan@mckaiglaw.com>

Aaron and Rayan,

I am very disappointed in how this appeal has been handled and how I always received documents the day before or in this case at 10:47 pm on the due date, I strong object to this brief and i feel that was not afforded the time in which to review it and discuss my concerns i have asked about the brief and to give me some kind of insight and reasonable time to review, and 10:47 pm it's not acceptable i don't want to file this brief, and I wuld like to have a phone conference to discuss moving forward! I object to filling this brief.!

Thanks

[Quoted text hidden]



1 message

## RESPONSE FROM AARON WALLACE ON HIS WITHDRAWAL

**Aaron Wallace** <awallace@wallacefirm.com>

Tue, Jul 22, 2025 at 7:27 A

To: Rodney White <numberoneauto2@gmail.com>

Cc: Ryan Mckaig <rmckaig@wallacefirm.com>, Ryan Mckaig <ryan@mckaiglaw.com>

Rodney,

Good morning. I am just seeing this email. This brief was a brief that was filed in accordance with the applicable law. If it had not been filed your appeal would be dismissed. Obviously, no one wanted you to awake to a dismissed case.

I have decided how we will be moving forward. We are going to go ahead and withdraw and request that the court allow you time to file your own amended brief since you apparently are more experienced and well learned in the law than we could ever hope to be.

We will send you a copy of our withdrawal paperwork and your timeline to file your own documents.

If you would like to have a discussion about how this process will work, let me know what time you are available.

Aaron V. Wallace, Esq.

Wallace Law Firm

1415 Laurel Street STE B

Columbia SC 29201

803-766-3997

www.wallacefirm.com

On Jul 21, 2025, at 11:40 PM, Rodney White <numberoneauto2@gmail.com> wrote:

[Quoted text hidden]



Plaintiff's counsel notified Defendant's counsel that his client had fifteen (15) days to remove any personal property items from the subject real property. See Exhibit B attached hereto. Defendant's counsel did not respond to this correspondence until nearly six (6) weeks later on April 9, 2025, and Defendant's trespassing on and refusal to vacate the real property continues. In fact, Defendant actually introduced a new vehicle to the real property in April 2025.

While Defendant filed a Notice of Intent to Appeal with the South Carolina Court of Appeals, Rule 205 of the South Carolina Appellate Court Rules states "[n]othing in these Rules shall prohibit the lower court, commission or tribunal from proceeding with matters not affected by the appeal." Defendant's continued presence on the subject real property is contrary to this Court's Final Order but is not affected by Defendant's appeal, and no supersedeas actions have been taken.

In sum, this Court remains the most appropriate Court to hear this matter, and Plaintiff moves before this Court for an Amendment of Final Order.

Greenwood, South Carolina

Law Offices of Brandon A. Smith, LLC

April 22, 2025

BY: s/ Brandon A. Smith  
Brandon A. Smith  
104 Maxwell Avenue  
Post Office Box 1810  
Greenwood, SC 29648  
(864) 229-4076 (phone)

Attorney for Plaintiff



---

**Fwd: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)**

1 message

---

**Aaron Wallace** <awallace@wallacefirm.com>  
To: Rodney White <numberoneauto2@gmail.com>

Fri, May 2, 2025 at 8:30 AM

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com

Begin forwarded message:

**From:** Aaron Wallace <awallace@wallacefirm.com>  
**Date:** May 2, 2025 at 8:28:13 AM EDT  
**To:** Chuck Watson <chuck@watsonlawfirm.com>  
**Cc:** Brandon Smith <bsmith@basmithlaw.com>, Ryan Mckaig <ryan@mckaiglaw.com>, Ryan Mckaig <rmckaig@wallacefirm.com>  
**Subject:** Re: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Hey,

We haven't filed our briefs yet. Rodney has directed us to oppose the Rule 60, he hasn't authorized us to proceed with a request for a stay either in the appellate court.

Please confirm for me that we don't need an official filing in opposition to the Rule 60 as it relates to our objection. I gather based on your previous response to Brandon that it may not be necessary.

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com

On May 2, 2025, at 8:12 AM, Chuck Watson <chuck@watsonlawfirm.com> wrote:

Would you guys mind sending me a copy of your appellate briefs so that I can tell what issues are under appeal?

Aaron, you mentioned you were petitioning the appellate court to give me permission to take some action. Please provide that as well.

**From:** Aaron Wallace <awallace@wallacefirm.com>  
**Sent:** Friday, May 2, 2025 7:43 AM  
**To:** Chuck Watson <chuck@watsonlawfirm.com>  
**Cc:** Brandon Smith <bsmith@basmithlaw.com>; Ryan Mckaig <ryan@mckaiglaw.com>; Ryan Mckaig <ryan@mckaiglaw.com>  
**Subject:** Re: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Chuck,

On the directive of my client, Rodney White, I am objecting to the Plaintiff using rule 60 to amend the final judgment. Thanks.

-Aaron

Aaron V. Wallace, Esq.

Wallace Law Firm

1416 Laurel Street, STE B

Columbia, SC 29201

803-766-3997

[www.wallacefirm.com](http://www.wallacefirm.com)

On Apr 30, 2025, at 4:21 PM, Chuck Watson <[chuck@watsonlawfirm.com](mailto:chuck@watsonlawfirm.com)> wrote:

Is this under appeal?

**From:** Aaron Wallace <[awallace@wallacefirm.com](mailto:awallace@wallacefirm.com)>

**Sent:** Wednesday, April 30, 2025 3:54 PM

**To:** Chuck Watson <[chuck@watsonlawfirm.com](mailto:chuck@watsonlawfirm.com)>

**Cc:** Brandon Smith <[bsmith@basmithlaw.com](mailto:bsmith@basmithlaw.com)>; Ryan Mckaig <[ryan@mckaiglaw.com](mailto:ryan@mckaiglaw.com)>; Ryan Mckaig <[rmckaig@wallacefirm.com](mailto:rmckaig@wallacefirm.com)>

**Subject:** Re: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Thank you. We will be getting something to you shortly addressing this stuff and we will be seeking relief from the appellate court to give you leave to enter an amended order to address issues raised by both parties.

Aaron V. Wallace, Esq.

Wallace Law Firm

1416 Laurel Street, STE B

Columbia, SC 29201

803-766-3997

[www.wallacefirm.com](http://www.wallacefirm.com)

On Apr 30, 2025, at 3:45 PM, Chuck Watson <chuck@watsonlawfirm.com> wrote:

I will be happy to look at whatever either of you wants to file. However, my order was issued, and the time to file for reconsideration has expired. As a result, I believe my order is final. If both parties consent, I do not mind entering a supplemental order. But, from my recollection, the standard under Rule 60 is rather steep.

**From:** Aaron Wallace <awallace@wallacefirm.com>  
**Sent:** Wednesday, April 30, 2025 3:15 PM  
**To:** Chuck Watson <chuck@watsonlawfirm.com>  
**Cc:** Brandon Smith <bsmith@basmithlaw.com>; Ryan Mckaig <ryan@mckaiglaw.com>; Ryan Mckaig <rmckaig@wallacefirm.com>  
**Subject:** Re: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Chuck,

We agree with the Plaintiff that the order as written needs clarification. We intend to file a more formal response within the next day or so. We will explain in greater detail in our response.

Aaron V. Wallace, Esq.

Wallace Law Firm

1416 Laurel Street, STE B

Columbia, SC 29201

803-766-3997

[www.wallacefirm.com](http://www.wallacefirm.com)

On Apr 23, 2025, at 12:58 PM, Chuck Watson <chuck@watsonlawfirm.com> wrote:

I don't think re-opening the judgment would work for you. Simply enforcing the judgment is probably the best way to go.

**From:** Brandon Smith <bsmith@basmithlaw.com>  
**Sent:** Tuesday, April 22, 2025 6:38 PM  
**To:** Chuck Watson <chuck@watsonlawfirm.com>

(864) 229-4076 (phone)

**From:** Chuck Watson <chuck@watsonlawfirm.com>  
**Sent:** Monday, February 24, 2025 12:31 PM  
**To:** 'Karen Heery' <kheery@greenwoodsc.gov>  
**Cc:** Brandon Smith <bsmith@basmithlaw.com>; 'Aaron Wallace' <awallace@wallacefirmssc.com>  
**Subject:** RE: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Thanks 🙏

**From:** Karen Heery <kheery@greenwoodsc.gov>  
**Sent:** Monday, February 24, 2025 11:43 AM  
**To:** Chuck Watson <chuck@watsonlawfirm.com>  
**Cc:** Brandon Smith <bsmith@basmithlaw.com>; Aaron Wallace <awallace@wallacefirmssc.com>  
**Subject:** Re: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

completed

On Fri, Feb 21, 2025 at 9:42 AM Chuck Watson <chuck@watsonlawfirm.com> wrote:

Karen, please file this order. This will end the case.

Chuck

-

***Karen D Heery***  
***Deputy Clerk of Court***  
***Common Pleas***  
***Greenwood County Courthouse***  
***864-942-8551***

Find Greenwood County on social media:

[<image001.jpg>](#)

**Cc:** Aaron Wallace <awallace@wallacefirmssc.com>  
**Subject:** RE: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

I did but thought this approach might be best since you are familiar with the facts. I can certainly entertain the Magistrate's Court route though.

Brandon A. Smith

Attorney

104 Maxwell Avenue (29646)

Post Office Box 1810 (29648)

Greenwood, South Carolina

(864) 229-4076 (phone)

**From:** Chuck Watson <chuck@watsonlawfirm.com>  
**Sent:** Tuesday, April 22, 2025 5:46 PM  
**To:** Brandon Smith <bsmith@basmithlaw.com>  
**Cc:** 'Aaron Wallace' <awallace@wallacefirmssc.com>  
**Subject:** RE: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Brandon, have you considered doing an ejectment through the magistrate court? It would probably be much quicker.

**From:** Brandon Smith <bsmith@basmithlaw.com>  
**Sent:** Tuesday, April 22, 2025 1:34 PM  
**To:** Chuck Watson <chuck@watsonlawfirm.com>  
**Cc:** 'Aaron Wallace' <awallace@wallacefirmssc.com>  
**Subject:** RE: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Good afternoon. Please see attached the motion and exhibits filed today.

Brandon A. Smith

Attorney

104 Maxwell Avenue (29646)

Post Office Box 1810 (29648)

Greenwood Mills, Inc.  
PLAINTIFF(S)

Rodney White  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

The Court heard the Defendant's motion to be relieved as counsel on July 15, 2024. The Court grants the Defendant's motion to be relieved. Defendant shall have 30 days to secure substitute counsel. A formal order will be submitted regarding the matter.

Additionally, the Court refers the entire matter to a Special Referee, to be selected by the Clerk of Court, for full hearing on the merits.

**ORDER INFORMATION**

This order  ends  does not end the case.  See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 07/15/2024 .

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRPC.

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Greenwood Common Pleas

**Case Caption:** Greenwood Mills, Inc. VS Rodney White

**Case Number:** 2021CP2400784

**Type:** Order/Electronic Form 4

It is so ordered

Eugene C. Griffith, Jr. 2154



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## Greenwood Mills, Inc. v White

14 messages

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**Brandon Smith** <bsmith@basmithlaw.com>

Wed, Oct 16, 2024 at 3:08 AM

To: mr.chuck.watson@gmail.com <mr.chuck.watson@gmail.com>

Cc: Rodney White <numberoneauto2@gmail.com>

Chuck,

Good evening- I hope this finds you doing well. As you may know, the Greenwood County Clerk of Court has appointed you as special referee in this matter. I represent the plaintiff and have copied the pro se defendant on this email. My client and I are ready to proceed at your convenience.

Please let me know what you need from us prior to hearing the matter.

Brandon A. Smith

Attorney

104 Maxwell Avenue (29646)

Post Office Box 1810 (29648)

Greenwood, South Carolina

(864) 229-4076 (phone)



**PIImageDisplay.aspx.pdf**

243 KB

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**Chuck Watson** <chuck@watsonlawfirm.com>

Thu, Oct 17, 2024 at 1:35 PM

To: Brandon Smith <bsmith@basmithlaw.com>, mr.chuck.watson@gmail.com

Cc: Rodney White <numberoneauto2@gmail.com>

My schedule is pretty open since I am semi-retired. What dates would suit the two of you?

Charles M. Watson Jr. ("Chuck")

Watson & Drew LLC

Real Estate Attorneys

333 Main Street

Greenwood SC 29646

864-229-2569

[Quoted text hidden]

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**Brandon Smith** <bsmith@basmithlaw.com>

Sat, Oct 19, 2024 at 1:33 AM

To: Chuck Watson <chuck@watsonlawfirm.com>, mr.chuck.watson@gmail.com <mr.chuck.watson@gmail.com>

Cc: Rodney White <numberoneauto2@gmail.com>

Chuck,

Good afternoon. Was just checking with everyone's schedules. We are available 10/28, 11/5 and 11/6. Thank you in advance!

Brandon A. Smith

Attorney

104 Maxwell Avenue (29646)

Post Office Box 1810 (29648)

Greenwood, South Carolina

(864) 229-4076 (phone)

[Quoted text hidden]

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**Brandon Smith** <bsmith@basmithlaw.com>

Tue, Oct 22, 2024 at 7:52 PM

To: Chuck Watson <chuck@watsonlawfirm.com>, mr.chuck.watson@gmail.com <mr.chuck.watson@gmail.com>

Cc: Rodney White <numberoneauto2@gmail.com>

Chuck,

Good evening. Just following up while it is on my mind. I do not expect Mr. White to respond. As such, I would request that we set a date. Thank you.

Brandon A. Smith

Attorney

104 Maxwell Avenue (29646)

Post Office Box 1810 (29648)

Greenwood, South Carolina

(864) 229-4076 (phone)

[Quoted text hidden]

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**Chuck Watson** <chuck@watsonlawfirm.com>

Wed, Oct 23, 2024 at 9:24 AM

To: Brandon Smith <bsmith@basmithlaw.com>

Cc: Rodney White <numberoneauto2@gmail.com>

Let's do November 6. How long do you think you will need? Also, will you arrange for a court reporter?

[Quoted text hidden]

---

**Brandon Smith** <bsmith@basmithlaw.com>

Wed, Oct 23, 2024 at 9:33 AM

To: Chuck Watson <chuck@watsonlawfirm.com>

Cc: Rodney White <numberoneauto2@gmail.com>

That works. If we start in the morning, I anticipate we should be finished by mid-afternoon at the latest. We will arrange the court reporter. Thank you.

Brandon A. Smith

Attorney

104 Maxwell Avenue (29646)

Post Office Box 1810 (29648)

Greenwood, South Carolina

(864) 229-4076 (phone)

On Oct 23, 2024, at 9:24 AM, Chuck Watson <chuck@watsonlawfirm.com> wrote:

[Quoted text hidden]

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**Chuck Watson** <chuck@watsonlawfirm.com>  
To: Brandon Smith <bsmith@basmithlaw.com>  
Cc: Rodney White <numberoneauto2@gmail.com>

Wed, Oct 23, 2024 at 9:45 AM

Do you want to file a motion for summary judgment to be heard at the same time?

[Quoted text hidden]

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**Brandon Smith** <bsmith@basmithlaw.com>  
To: Chuck Watson <chuck@watsonlawfirm.com>  
Cc: Rodney White <numberoneauto2@gmail.com>

Wed, Oct 23, 2024 at 9:52 AM

Yes sir. We would need the summary judgment motion heard before trial. Thank you.

Brandon A. Smith  
Attorney  
104 Maxwell Avenue (29646)  
Post Office Box 1810 (29648)  
Greenwood, South Carolina  
(864) 229-4076 (phone)

On Oct 23, 2024, at 9:45 AM, Chuck Watson <chuck@watsonlawfirm.com> wrote:

[Quoted text hidden]

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**Brandon Smith** <bsmith@basmithlaw.com>  
To: Chuck Watson <chuck@watsonlawfirm.com>  
Cc: Rodney White <numberoneauto2@gmail.com>

Fri, Oct 25, 2024 at 12:04 PM

Chuck, good afternoon. Does 9 am on 11/6 work for you to get started? Thanks

Brandon A. Smith  
Attorney  
104 Maxwell Avenue (29646)  
Post Office Box 1810 (29648)  
Greenwood, South Carolina  
(864) 229-4076 (phone)

On Oct 23, 2024, at 9:52 AM, Brandon Smith <bsmith@basmithlaw.com> wrote:

Yes sir. We would need the summary judgment motion heard before trial. Thank you.  
[Quoted text hidden]

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**Chuck Watson** <chuck@watsonlawfirm.com>  
To: Brandon Smith <bsmith@basmithlaw.com>  
Cc: Rodney White <numberoneauto2@gmail.com>

Fri, Oct 25, 2024 at 2:37 PM

Sure.

[Quoted text hidden]

---

**Rodney White** <numberoneauto2@gmail.com>  
To: Chuck Watson <chuck@watsonlawfirm.com>  
Cc: Brandon Smith <bsmith@basmithlaw.com>

Wed, Oct 30, 2024 at 6:24 PM

Good afternoon, Mr Watson and Mr Smith, Mr Watson I don't think I've had the pleasure to meet you , but i hope this finds everyone in good spirits, my apologies for the late response , To update everyone on my status I had been in search of an attorney, but the recent storms that affected the area and circumstances beyond my control halt my search,i currently have a attorney pending but November 6 is not a good date for them, I was ask to request a 30 day extension, I would greatly appreciate everyone for understanding and considering my request, thanks

[Quoted text hidden]

---

**Chuck Watson** <chuck@watsonlawfirm.com>  
To: Rodney White <numberoneauto2@gmail.com>  
Cc: Brandon Smith <bsmith@basmithlaw.com>

Wed, Oct 30, 2024 at 6:33 PM

Please ask your attorney to contact me about requesting an extension. I will be glad to speak with him/her.

[Quoted text hidden]

---

**Rodney White** <numberoneauto2@gmail.com>  
To: Chuck Watson <chuck@watsonlawfirm.com>  
Cc: Brandon Smith <bsmith@basmithlaw.com>

Wed, Oct 30, 2024 at 6:49 PM

Will do, thank you.

[Quoted text hidden]

---

**Chuck Watson** <chuck@watsonlawfirm.com>  
To: Rodney White <numberoneauto2@gmail.com>  
Cc: Brandon Smith <bsmith@basmithlaw.com>

Thu, Oct 31, 2024 at 1:24 PM

Who is your attorney?

[Quoted text hidden]



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**Fwd: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)**

1 message

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**Aaron Wallace** <awallace@wallacefirm.com>  
To: Rodney White <numberoneauto2@gmail.com>

Wed, Apr 9, 2025 at 1:10 P

Never saw the email. He didn't even know whether I was continuing to represent you. He should have served you with a notice of eviction.

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com

Begin forwarded message:

**From:** Brandon Smith <bsmith@basmithlaw.com>  
**Date:** February 21, 2025 at 10:04:30 AM EST  
**To:** Aaron Wallace <awallace@wallacefirm.com>  
**Subject:** RE: Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Aaron,

Good morning. Please pass along to your client that he has 15 days to remove any personal property items from the 341 Maxwell Ave., Greenwood, SC property.

Brandon A. Smith  
Attorney  
104 Maxwell Avenue (29646)  
Post Office Box 1810 (29648)  
Greenwood, South Carolina  
(864) 229-4076 (phone)

**From:** Chuck Watson <chuck@watsonlawfirm.com>  
**Sent:** Friday, February 21, 2025 9:42 AM  
**To:** 'Karen Heery' <kheery@greenwoodsc.gov>  
**Cc:** Brandon Smith <bsmith@basmithlaw.com>; 'Aaron Wallace' <awallace@wallacefirm.com>  
**Subject:** Greenwood Mills Inc vs Rodney White (2021-CP-24-784)

Karen, please file this order. This will end the case.

Chuck



## Fwd: Concerns Regarding Eviction Process and Property Security

1 message

**Aaron Wallace** <awallace@wallacefirm.com>  
To: Rodney White <numberoneauto2@gmail.com>

Thu, Apr 10, 2025 at 12:22 AM

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com

Begin forwarded message:

**From:** Brandon Smith <bsmith@basmithlaw.com>  
**Date:** April 9, 2025 at 9:47:13 PM EDT  
**To:** Aaron Wallace <awallace@wallacefirm.com>  
**Subject:** Re: Concerns Regarding Eviction Process and Property Security

Aaron,

Your client's junk has been documented is available to him to retrieve until Monday. The vehicle will be towed to a location to be determined. My client found approximately \$30 in cash that will be made available to your client at a mutually agreeable time at The Greenwood Building (104 Maxwell Ave., Greenwood).

Brandon A. Smith  
Attorney  
104 Maxwell Avenue (29646)  
Post Office Box 1810 (29648)  
Greenwood, South Carolina  
(864) 229-4076 (phone)

On Apr 9, 2025, at 2:39 PM, Aaron Wallace <awallace@wallacefirm.com> wrote:

Brandon:

Please ensure that Mr. White's property is promptly placed back in the premises. He is wrongfully evicted in violation of the law.

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com

On Apr 9, 2025, at 1:32 PM, Aaron Wallace <awallace@wallacefirm.com> wrote:

Dear Brandon,

Good afternoon. I am just now seeing your email and noticed that I had not received any follow-up. Rodney has expressed concern that his belongings are being destroyed. Could you

please confirm whether any steps have been taken to secure his property:

Additionally, I believe that upon receiving the Judge's order, the proper eviction process should have been followed. As the order did not specify a time frame for vacating the premises, it is unclear whether the procedural requirements for notice and due process have been fully satisfied.

I would appreciate it if you could provide your position on these matters at your earliest convenience.

Thank you, and I look forward to your response.

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
[www.wallacefirm.com](http://www.wallacefirm.com)

Rodney,

Hey there, Brandon is currently planning to go to the magistrate to properly begin the eviction process. Chuck pointed out that the initial motion filed was incorrect, so they are now taking steps to remedy the situation. This could potentially be used as evidence of their mistakes and may be a good opportunity to demonstrate any damages incurred. What do you think about this situation? Let me know your thoughts.

-Aaron

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com

On Apr 24, 2025, at 4:38 AM, Rodney White <numberoneauto2@gmail.com> wrote:

[Quoted text hidden]

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**Aaron Wallace** <awallace@wallacefirm.com>  
To: Rodney White <numberoneauto2@gmail.com>  
Cc: Ryan Mckaig <ryan@mckaiglaw.com>, Ryan Mckaig <rmckaig@wallacefirm.com>

Thu, Apr 24, 2025 at 9:55 /

Also, Rodney, we have quite a few things that need to be done on this case, so we need you to pay the trust request. We can try to get some attorney fees back on the wrongful eviction claim. I think that's a strong case.

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com  
[Quoted text hidden]

---

**Rodney White** <numberoneauto2@gmail.com>  
To: Aaron Wallace <awallace@wallacefirm.com>  
Cc: Ryan Mckaig <ryan@mckaiglaw.com>, Ryan Mckaig <rmckaig@wallacefirm.com>

Fri, Apr 25, 2025 at 11:54 /

Please advise the plaintiffs attorney that when I properly evicted I will act accordingly

[Quoted text hidden]

---

**Rodney White** <numberoneauto2@gmail.com>  
Draft To: Aaron Wallace <awallace@wallacefirm.com>  
Cc: Ryan Mckaig <rmckaig@wallacefirm.com>, Ryan Mckaig <ryan@mckaiglaw.com>

Thu, Sep 18, 2025 at 1:42 F

011

On Thu, Apr 24, 2025, 9:28 AM Aaron Wallace <awallace@wallacefirm.com> wrote:  
Rodney,

Hey there, Brandon is currently planning to go to the magistrate to properly begin the eviction process. Chuck pointed out that the initial motion filed was incorrect, so they are now taking steps to remedy the situation. This could potentially be used as evidence of their mistakes and may be a good opportunity to demonstrate any damages incurred. What do you think about this situation? Let me know your thoughts.

-Aaron

**Re: 341 Maxwell Ave.**

Hey. He hasn't retained me for that so you will need to serve him directly.

Aaron V. Wallace, Esq.  
Wallace Law Firm  
1416 Laurel Street, STE B  
Columbia, SC 29201  
803-766-3997  
www.wallacefirm.com

On May 20, 2025, at 3:17 PM, Brandon Smith <[bsmith@basmithlaw.com](mailto:bsmith@basmithlaw.com)> wrote:

[See More](#)



**Brandon Smith**

3:17 PM

To: Aaron Wallace >

Aaron,

Good afternoon. Will you accept service for your client for the eviction action?

Brandon A. Smith  
Attorney  
[104 Maxwell Avenue](#) (29646)  
Post Office Box 1810 (29648)  
Greenwood, South Carolina  
[\(864\) 229-4076](tel:8642294076) (phone)

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

NOV 04 2025

SC Court of Appeals

APPEAL FROM Greenwood COUNTY  
Court of Common Pleas

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

Case No. 2021-CP-24-00284

2025-000569

Greenwood mills

Appellant/Respondent,

v.

Rodney White

Appellant/Respondent.

PROOF OF SERVICE

I certify that I have served the motion in opposition on Brandon Smith by depositing  
(Document) (Name)  
a copy of it in the United States Mail, postage prepaid, on 11-4-25, addressed to,  
(Date)  
Law offices of Brandon A Smith 104 Maxwell Ave  
Greenwood SC 29646

Date: 11-4-25

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