

IN THE SOUTH CAROLINA COURT OF APPEALS  
First Class Barbers, LLC, Appellant  
v.  
Douglas Family Partnership, LLP, Respondent  
Appellate Case No. 2025-002312

**RECEIVED**  
**Nov 26 2025**  
SC Court of Appeals

## **MOTION TO ADDRESS IMPROPER WITHDRAWAL OF COUNSEL AND REQUEST FOR RELIEF**

Comes now Ortagus Bennett, managing member of First Class Barbers, LLC, and respectfully moves this Court for relief arising from the trial court's order permitting prior counsel to withdraw. In support thereof, Mr. Bennett states as follows:

### 1. Lack of Notice and Opportunity to Be Heard

The trial court permitted counsel for Appellant to withdraw without providing Mr. Bennett timely notice or an opportunity to be heard. As a result, Appellant was left without legal representation at a critical stage of litigation. This constitutes a deprivation of due process under the Fourteenth Amendment to the U.S. Constitution and Article I, § 3 of the South Carolina Constitution.

### 2. Counsel's Withdrawal Was Not Properly Safeguarded

Under Rule 1.16(c) of the South Carolina Rules of Professional Conduct, an attorney may not terminate representation without taking steps to ensure the client is not prejudiced. No protective measures were implemented to ensure the LLC could pursue its legal rights. The withdrawal directly created the deficiencies identified in the Clerk's November 18, 2025 notice.

### 3. Prejudice Resulting From Counsel Abandonment

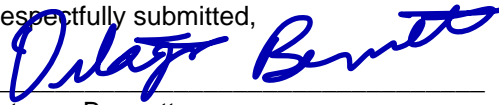
South Carolina law prohibits LLCs from proceeding without legal counsel. See *Renaissance Enters. v. Summit Teleservices, Inc.*, 334 S.C. 649, 515 S.E.2d 257 (1999). The improper withdrawal effectively extinguished Appellant's ability to participate in judicial proceedings, preventing the prosecution of this appeal.

### 4. Request for Relief

Mr. Bennett respectfully requests:

- a. That the Court recognize the due-process violation caused by improper withdrawal of counsel;
- b. That the Court grant additional time for Appellant to retain qualified counsel;
- c. Alternatively, that the Court stay dismissal until counsel properly enters an appearance;
- d. That the deficiencies in the Clerk's letter be held in abeyance until representation issues are corrected.

Respectfully submitted,



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***CERTIFICATE OF SERVICE***

I certify that I have served a copy of this filing on all counsel of record by depositing it in the United States mail with proper postage affixed.

Date: 11/26/25