

**RECEIVED**

**Feb 06 2026**

**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

---

Greenwood Mills, Inc., Respondent,

v.

Rodney White, Appellant.

---

RESPONDENT'S RETURN TO APPELLANT'S  
MOTION FOR RELIEF

---

Brandon A. Smith  
Law Offices of Brandon A. Smith, LLC  
104 Maxwell Ave.  
Suite 500  
Greenwood, SC 29646  
Attorney for Respondent  
Greenwood Mills, Inc.

In response to Appellant's Motion for Relief, Respondent submits that none of the rules cited by Appellant provide an avenue for the relief sought. Further, Appellant again introduces alleged issues irrelevant, unpreserved and/or not in the trial court record in support of incoherent arguments. Throughout the entire motion, Appellant continues to mischaracterize the trial court's findings and procedures. Such findings and procedures are readily available to this Court in a Record on Appeal.

Appellant invokes "Rule 2" in support of his vague appeal to suspend procedural rules. Respondent submits the South Carolina Rules of Appellate Procedure do not allow for relief in this manner, and nothing raised in Appellant's motion warrants this Court's granting of such a motion. Respondent seeks resolution of the appeal based on timely-filed briefs, which does not include Appellant's Reply Brief, filed more than ten (10) days after filing of Respondent's Initial Brief.

In that regard, because of the lack of any genuine issues of material fact, the trial court correctly and properly granted Greenwood Mills partial summary judgment, the only finding appealed to this Court. Most importantly, Appellant preserved no issues for which he seeks relief from this Court. Even if reviewed, the undisputed record establishes that White failed to perform his obligations pursuant to any contract, resulting in Greenwood Mills' termination of any and all agreements. White's remaining challenges rest on immaterial factual assertions, unpreserved procedural complaints or issues beyond the scope of the summary judgment order and therefore, provide no basis for appellate relief.

For all the foregoing, Appellant's motion should be denied, and the trial court's record should be affirmed in all respects.

*(SIGNATURE PAGE TO FOLLOW)*

Respectfully submitted,

February 6, 2026

/s/ Brandon A. Smith

Brandon A. Smith

Law Offices of Brandon A. Smith, LLC

104 Maxwell Ave.

Suite 500

Greenwood, SC 29646

Attorney for Respondent

Greenwood Mills, Inc.

**RECEIVED**

**Feb 06 2026**

**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

---

Greenwood Mills, Inc., Respondent,

v.

Rodney White, Appellant.

---

PROOF OF SERVICE

---

The undersigned certifies that he, as counsel for Respondent Greenwood Mills, Inc., has served as copy of Respondent's Return to Appellant's Motion for Relief on Appellant at the following address below registered with this Court.

Rodney White  
341 Maxwell Ave.  
Greenwood, SC 29646

/s/ Brandon A. Smith  
Brandon A. Smith  
Law Offices of Brandon A. Smith, LLC  
104 Maxwell Ave.  
Suite 500  
Greenwood, SC 29646  
Attorney for Respondent  
Greenwood Mills, Inc.