

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Greenwood Mills, Inc.,
Respondent,

v.

Rodney White,
Appellant.

Appellate Case No.: 2025-000569

RECEIVED

APR 13 2026

SC Court of Appeals

AFFIDAVIT OF RODNEY WHITE IN SUPPORT OF APPELLANT'S REPLY AND MOTION FOR
EXTENSION OF TIME

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

1. I am the Appellant in the above-captioned matter and have personal knowledge of the facts set forth herein.
2. During the course of this appeal, my appellate counsel filed the Initial Brief and Designation of Matter and subsequently informed me of their intent to withdraw representation.
3. Prior to their withdrawal, counsel presented me with the option to withdraw the Initial Brief and Designation of Matter due to concerns that those filings were misleading and damaging to my appeal. I agreed to their withdrawal in order to prevent further prejudice to my case.
4. Following counsel's withdrawal, I was left without representation at a critical stage of the appellate process and was forced to proceed pro se.
5. I made diligent efforts to obtain replacement counsel but was unable to do so due to the posture and complexity of the case and the limited time involved.
6. As a result, I have been required to reconstruct filings, prepare appellate documents, and assemble the Record on Appeal without legal training or prior appellate experience.
7. On or about April 9, 2025, the Respondent entered the property that is the subject of this appeal without providing notice, without a lawful writ, and without authorization from this Court.
8. During that entry, my personal property, including documents and materials necessary for the preparation of the Record on Appeal, were removed and discarded.
9. As a direct result of Respondent's actions, I lost access to critical documents and have been forced to reconstruct portions of the Record on Appeal, which has contributed to delays in finalizing the Record.
10. After performing the eviction, Respondent sought to legitimize those actions by filing a motion under Rule 60. That effort was unsuccessful.

11. Thereafter, Respondent proceeded in Magistrate Court and obtained a writ of ejectment, which was later stayed upon recognition of this Court's jurisdiction.

12. All of these actions occurred while this matter was pending before the South Carolina Court of Appeals.

13. I have acted in good faith and with diligence at all times in attempting to preserve my appeal and comply with the Rules of Appellate Procedure.

14. Any delay in this matter has been the result of circumstances beyond my control, including counsel withdrawal and Respondent's actions, and not any attempt by me to delay or misuse the legal process.

15. In support of my Motion, photographs are attached depicting the mass disposal of personal property and files that were discarded.

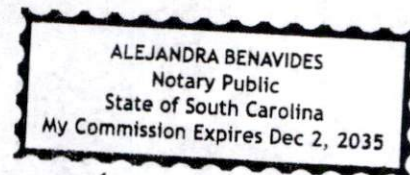
FURTHER AFFIANT SAYETH NOT.

Rodney White

Rodney White

Date: 4-13-26

SWORN to before me this 13 day of April, 2026.

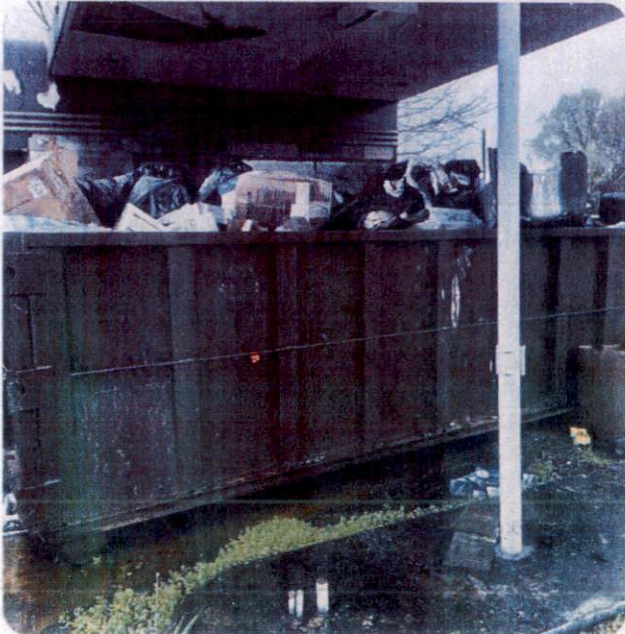


Alejandra Benavides

Notary Public for South Carolina

My Commission Expires: 12/02/2035

This exhibit is submitted in support of Appellant's Reply to Respondent's Return in Opposition to Motion for Extension of Time and in further support of the Affidavit of Appellant, Rodney White, and reflects the condition and disposition of personal property and materials relevant to the issues presented before this Court.



CERTIFICATE OF SERVICE (AFFIDAVIT)

I hereby certify that a true and correct copy of the foregoing Affidavit of Rodney White in Support of Appellant's Reply and Motion for Extension of Time was served upon counsel for the Respondent as follows:

Brandon A. Smith
Law Offices of Brandon A. Smith, LLC
104 Maxwell Ave, Suite 500
Greenwood, South Carolina 29646

by the following method:

- United States Mail, postage prepaid
 Hand Delivery
 Electronic Service (via appellate e-filing system, if applicable)

This the 13 day of April, 2026.

Rodney White
Appellant, Pro Se
341 Maxwell Ave
Greenwood, SC 29646
Numberoneauto2@gmail.com

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