

**STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE**

Linhart Realty Group LLC d/b/a RE/MAX
Results,

Plaintiff / Counterclaim Defendant,

v.

Adam Matthew Steinberger,

Pro Se Defendant / Counterclaimant.

IN THE COURT OF COMMON PLEAS

Case No.: 2025-CP-23-05006

**DEFENDANT'S MOTION FOR
CONTINUANCE**

OF MAY 5, 2026 HEARING

(Retention of Counsel)

FILED: 26APR22PM2:19
COC JAY GRESHAM GUL SC

INTRODUCTION

Defendant Adam Matthew Steinberger, appearing pro se, respectfully moves this Court pursuant to Rule 40(i) of the South Carolina Rules of Civil Procedure for a continuance of the hearing currently scheduled for May 5, 2026. Defendant is in active discussions with prospective legal counsel who has expressed willingness to represent Defendant in this matter, contingent upon the Court granting a continuance sufficient to allow adequate preparation. Proceeding on May 5, 2026 without that continuance would effectively foreclose Defendant's ability to obtain representation and would substantially prejudice his ability to present his defense and counterclaims.

This motion is not made for purposes of delay. Defendant has participated actively and in good faith in these proceedings since being served on October 6, 2025, filing timely responses, affirmative defenses, counterclaims, and multiple memoranda of law. The retention of counsel at this stage reflects a sincere effort to ensure that the matters before this Court are presented with appropriate legal representation, to the benefit of both parties and the Court.

GROUND FOR CONTINUANCE

1. Defendant is in active discussions with prospective legal counsel who has indicated a willingness to represent Defendant in this matter. Prospective counsel has advised Defendant that formal retention is contingent upon the Court granting a continuance sufficient to allow counsel adequate time to review the case record and prepare for hearing. Counsel is not available to meet with Defendant, review the file, or prepare for appearance until May 18, 2026 at the earliest.
2. The hearing currently scheduled for May 5, 2026 does not provide prospective counsel sufficient time to prepare. Requiring Defendant to proceed on May 5 without representation

ENTERED COMPUTER

would effectively foreclose the possibility of retaining counsel at all, as no attorney can ethically appear at a hearing for which they have had no opportunity to prepare. A short continuance is the threshold condition that makes representation possible.

3. The case record before this Court is substantial. It includes Plaintiff's Complaint and Reply, Defendant's Answer, Affirmative Defenses, and Counterclaim (November 9, 2025), Defendant's Amendment thereto (January 20, 2026), Plaintiff's Motion to Dismiss the Amendment (March 2, 2026), Defendant's Opposition (March 4, 2026), Defendant's Motion to Dismiss for Abuse of Process (March 5, 2026), and multiple supporting memoranda of law. Incoming counsel cannot reasonably absorb this record and provide effective representation between May 5 and May 18.
4. Defendant has a formal AuDHD and PTSD diagnosis (confirmed December 15, 2025, Exhibit 3) that substantially limits his ability to navigate adversarial oral proceedings without representation. Defendant has filed a concurrent Memorandum in Lieu of Verbal Testimony as an ADA accommodation for the May 5 hearing. The availability of counsel would render that accommodation less necessary and would serve the interests of all parties in a complete and orderly hearing.
5. A short continuance of approximately four to six weeks from the current hearing date would allow newly retained counsel adequate time to prepare and would not materially prejudice Plaintiff. This action has been pending since August 12, 2025. A brief additional delay to allow Defendant to appear with counsel does not alter the fundamental posture of the case.
6. South Carolina courts have consistently held that the right to be represented by counsel is a fundamental aspect of a fair hearing, and that continuances should be granted where retention of counsel is the reason and the request is timely and not dilatory. Defendant submits this motion promptly upon confirming counsel's availability constraints, and well in advance of the May 5 hearing date.

RELIEF REQUESTED

Defendant respectfully requests that this Court:

- (a) Grant a continuance of the May 5, 2026 hearing to a date on or after May 19, 2026, to allow newly retained counsel adequate time to prepare;
- (b) Hold Defendant's concurrent Memorandum in Lieu of Verbal Testimony (ADA Accommodation) in abeyance pending the rescheduled hearing date; and
- (c) Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,



Adam Matthew Steinberger

Pro Se Defendant / Counterclaimant

Date: April 22, 2026

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2026, a true and correct copy of the foregoing Defendant's Motion for Continuance was served upon Plaintiff's counsel of record via United States Mail, first-class postage prepaid, addressed as follows:

W. Christopher Schwartz, Esq. (SC Bar #106429)
M. Stokely Holder, Esq. (SC Bar #73892)
Holder, Padgett, Littlejohn & Prickett, LLC
P.O. Box 1804
Greenville, SC 29602



Adam Matthew Steinberger

Date: April 22, 2026

State of South Carolina	In the Court of Common Pleas
County of <u>Greenville</u>	Judicial Circuit

Plaintiff(s): <u>Lizhart Realty Group LLC d/b/a Remax Results</u>	Case No. <u>2025-CP-23-05006</u>
vs.	
Defendant(s): <u>Adam Matthew Stenberg</u>	

Motion and Order Information Form and Coversheet

Plaintiff's Attorney: _____

Bar Number: _____

Address: _____

Phone Number: _____

Email: _____

Fax: _____

Other: _____

Defendant's
Attorney:

Adam Matthew Steinbejer

Bar
Number:

Address:

236 Tippin Rd, Travelers Rest,
SC 29690

Phone
Number:

864-517-4117

Email:

adam@matthewsteinbejer.com

Fax:

Other:

Select Applicable Checkbox:

- ☒ MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
☐ FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
☐ PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of
Motion:

Motion For Continuance
of May 5, 2026 Hearing

Estimated
Time Needed:

4-6 weeks

Court Reporter
Needed:

SECTION II: Motion / Order Type

Select Applicable Checkbox:

- ☒ Written motion attached
☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.


Signature of Attorney for (Check One):

9/22/26
Date Submitted

- ☐ Plaintiff(s)
☒ Defendant(s)

SECTION III: Motion Fee

Check Applicable Checkbox:

- ☒ Paid

Amount Paid: \$ 25

☐ Exempt:

Check Reason:

- ☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status
☐ State Agency v. Indigent Status
☐ Sexually Violent Predator Act
☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Execution (Rule 69, SCRCP)
☐ Motion for Publication
☐ Proposed Order Submitted at Request of the Court; or, Reduced to Writing from Motion Make in Open Court Per Judge's Instructions
Name of Court Reporter: _____

☐ Other _____

Judge's Section

Check Reason: ☐ Motion Fee to be paid upon filing of the attached order.

☐ Other _____

Judge's Signature

Judge's Code

Date of Signature

Clerk's Verification

Collected By: LM

Date Filed: 4/22/26

☒ Motion Fee Collected: \$ 25

☐ Contested: \$ _____

Custodial Parent (if applicable): _____