

RECEIVED

Dec 22 2025

SC Court of Appeals

Geraldine White
141 Lamotte DR
Unit A 3
Hilton Head, S.C. 29926

August 6, 2018

Attorney J. Vaux,
Enclosed is Capres request.

Geraldine White

Exhibit 21

VAUX MARSCHER BERGLIND

A SOUTH CAROLINA PROFESSIONAL ASSOCIATION

WILLIAM F. MARSCHER, III
MARK S. BERGLIND
ROBERTS "TABOR" VAUX, JR.

ATTORNEYS AND COUNSELORS AT LAW
POST OFFICE BOX 769 (MAILING)
1251 MAY RIVER ROAD (PHYSICAL)
BLUFFTON, SOUTH CAROLINA 29910
843.757.2888 (OFFICE)
843.757.2889 (FAX)

ROBERTS VAUX
ANTONIA LUCIA, SC & NY
JAMES P. SCHNEIDER, JR.
JUSTIN JOHN PRICE
STEPHEN MEYER

tabor.vaux@vmblawfirm.com

August 10, 2018

Geraldine White
141 Lamotte Drive, Unit A3
Hilton Head Island, SC 29926

Re: Benny Hudson Seafood Corp. vs. Geraldine J. White

Dear Ms. White:

After reviewing your documents, I cannot pursue the above matter, as I have a conflict due to County Council. I wish I could be of assistance but I must decline representation. However, we would encourage you to have another attorney review your file.

We appreciate you contacting our law firm and if we can be of assistance in the future please let me know.

With kindest regards, I am

Sincerely,

VAUX MARSCHER BERGLIND, P.A.


Roberts "Tabor" Vaux, Jr.

*Dear Mrs. White,
Tabor asked me to
let you know that you need to get an attorney
ASAP. Please contact me upon receipt of this
letter at 843 757-2888 to let me know you
received this.*

Helen Cilli
Helen Cilli
Paralegal to
16 WILLIAM POPE DRIVE, SUITE 302
29908 OKATIE, SOUTH CAROLINA 29909
(843) 785-2888 (OFFICE)
(843) 785-3889 (FAX)

OTHER OFFICES:
Roberts "Tabor" Vaux Jr.
525 FOLLY ROAD, SUITE
CHARLESTON, SOUTH CAROLINA 29403
(843) 822-4313 (OFFICE)
(843) 757-3889 (FAX)

Vaux Marscher Berglind, PA
PO Box 769
Bluffton, SC 29910
Attn: Heleen Gilli

CHARLESTON
SC 2994
44-305-018
P.M. 11

Vaux Marscher Berglind

Geraldine White
141 Lamotte Drive, Unit A3
Hilton Head Island, SC 29926

FIRST CLASS



UNITED STATES POSTAGE
PITNEY BOWES
\$ 000.470
02 1P
0006566974 AUG 13 2018
MAILED FROM ZIP CODE 29910

29926-272013



Exhibit 23

VAUX MARSCHER BERGLIND

A SOUTH CAROLINA PROFESSIONAL ASSOCIATION

WILLIAM F. MARSCHER, III
MARK S. BERGLIND
ROBERTS "TABOR" VAUX, JR.

ATTORNEYS AND COUNSELORS AT LAW
POST OFFICE BOX 769 (MAILING)
1251 MAY RIVER ROAD (PHYSICAL)
BLUFFTON, SOUTH CAROLINA 29910
843.757.2888 (OFFICE)
843.757.2889 (FAX)

ROBERTS VAUX
ANTONIA LUCIA, SC & NY
JAMES P. SCHEIDER, JR.
JUSTIN JOHN PRICE
STEPHEN MEYER

tabor.vaux@vmblawfirm.com

August 22, 2018

Geraldine White
141 Lamotte Drive, Unit A3
Hilton Head Island, SC 29926

Re: Benny Hudson Seafood Corp. vs. Geraldine J. White

Dear Ms. White:

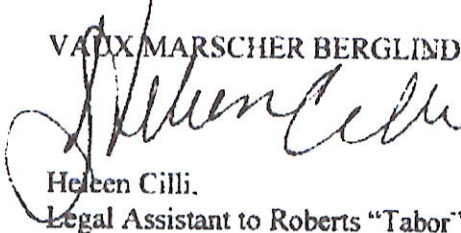
Enclosed please find the documents which we received on August 17, 2018 regarding the above matter which I am returning to you.

We appreciate you contacting our law firm and if we can be of assistance in the future please let me know.

With kindest regards, I am

Sincerely,

VAUX MARSCHER BERGLIND, P.A.



Heleen Cilli.

Legal Assistant to Roberts "Tabor" Vaux, Jr.

Page 47

OTHER OFFICES:

16 WILLIAM POPE DRIVE, SUITE 202
2000 WATIE, SOUTH CAROLINA 29909
(843) 705-2888 (OFFICE)
(843) 705-2889 (FAX)

525 FOLLY ROAD, SUITE
CHARLESTON, SOUTH CAROLINA 29403
(843) 822-4313 (OFFICE)
(843) 757-2889 (FAX)

By: s/Roberts "Tabor" Vaux, Jr.
Roberts "Tabor" Vaux, Jr.
Vaux Marscher Berglind, P.A.
SC Bar No. 5702
Post Office Box 769
1251 May River Road
Bluffton, South Carolina 29910
Tel.: 843-757-2888
Fax: 843-757-2889

ELECTRONICALLY FILED - 2018 Oct 08 2:55 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0700804

799



Beaufort Common Pleas

Case Caption: Benny Hudson Seafood Corp VS Martin Govan
Case Number: 2018CP0700804
Type: Order/Substitution Of Counsel

So Ordered

s/Carmen T Mullen 2142

Electronically signed on 2018-10-08 13:39:24 page 3 of 3

ELECTRONICALLY FILED - 2018 Oct 08 2:55 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0700804

79b



BERRY & CARR

THOMAS M. BERRY
Hilton Head Island Lawyers, LLC

DAVID H. BERRY
David H. Berry & Associates, LLC

PATRICK W. CARR
Patrick W. Carr & Associates, LLC

MICHAEL P. BENNETT
Michael P. Bennett & Associates, LLC

URGENT AND CONFIDENTIAL

October 17, 2018

Geraldine White
141 Lamotte Drive
Apartment A3
Hilton Head Island, SC 29926

**RE: Legal Case
Benny Hudson Seafood Corp. v. Geraldine White and Craig White
2018-CP-07-00793**

Dear Ms. White:

Thank you for contacting our law firm to discuss potential representation in the above matter. This will follow our recent telephone conversations confirming that our law firm will not be able to represent you or Craig White in this matter. When we initially discussed this matter with you and Martin Govan, we mistakenly assumed that both of you were parties to the same lawsuit with identical procedural posture. However, we have now learned that there are two separate lawsuits filed by Benny Hudson Seafood Corp. (one filed by attorney John R.C. Bowen against you and Craig White and another filed by attorney William Bowen against Martin Govan). We have also learned that the case against you and Craig White has already resulted in a default judgment against you in the amount of \$201,723.27. We have also learned that the relative geographical positioning of the sunken vessels at this dock location makes it impossible for all parties here to have their interests aligned with respect to the legal claims presented against them by Hudson. We have also learned that there are certain factual allegations raised by the parties that create a conflict of interest in having the same defense counsel try to represent and defend all parties in these two separate actions. For these reasons, we have concluded that our firm is unable, ethically and otherwise, to represent you and/or Craig White in this matter. Our appearance as counsel in this matter will be limited to defending the party who initially retained us, Martin Govan.

Please know that the claims made against you and Craig White are very serious and could present financial exposure to you both if you do not take prompt action. We strongly urge you to hire counsel in this matter immediately, as the default judgment against you and Craig White must be contested by way of a Rule 60(b) Motion to Vacate Default Judgment. A competent lawyer in the civil litigation arena should be able to assist you with that, but it must be done immediately because the Court will be less likely to grant such relief to a defaulting party the more time that elapses from the entry of the default judgment, and the rule typically precludes relief from default

MAIN OFFICE: 2 Spanish Wells Road • Hilton Head Island, South Carolina 29926 • Office: 843.686.5432 • Facsimile: 843.785.6173
LITIGATION AND MEDIATION CENTER: Copy Center Place, Suite 101 • Hilton Head Island, SC 29926 • Phone: 843.686.5432 • Fax: 843.785.6173
COURTHOUSE OFFICE: 107 Lowry Street • Beaufort, South Carolina 29518 • Phone: 843.725.1111 • Fax: 843.725.1111

WWW.HILTONHEADLAWYERS.COM

Page 56