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SC Court of Appeals

IN THE SOUTH CAROLINA COURT OF APPEALS

In The Court Of Appeals

APPEAL FROM BEAUFORT COUNTY

Court of Common Pleas

The Honorable Carmen T. Mullen/Circuit Court Judge

Case No: 2018-CP-07-00718

Appellate Case No: 2025-002399

Geraldine White, Appellant

v.

John R.C. Bowen and Kori Brett McKeithan, Respondents

DESIGNATION OF MATTER FOR RECORD ON APPEAL

Geraldine White, Appellant Pro Se
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DESIGNATION OF MATTER FOR RECORD ON APPEAL

Pursuant to Rule 210(b)(1)(B), SCACR, Appellant Geraldine White hereby designates for inclusion in the Record on Appeal the entire lower court file and all matter necessary for review of the issues raised on appeal, including, without limitation, the following:

1. The summons, petition, complaint, and all amendments, attachments, and exhibits filed by Appellant in this action.
2. All memoranda, briefs, declarations, affidavits, exhibits, and supporting filings submitted by Appellant in support of her claims and in opposition to dismissal and/or summary judgment.
3. All declarations, statements, or filings by Appellant identifying the issues presented for review, including filings addressing attorney immunity, fraud upon the court, Rule 56 fact-finding, lien validity, vessel ownership, and the dissolution and reinstatement of Benny Hudson Seafood Corp.
4. Respondent John R. C. Bowen's motion to dismiss and/or motion for summary judgment, together with all supporting memoranda, affidavits, exhibits, and attachments.
5. Respondent Kori Brett McKeithan's Rule 12(b)(6) motion to dismiss, together with all supporting memoranda, exhibits, and attachments.
6. All responses, replies, supplemental memoranda, sur-replies, notices, and other written submissions filed by any party concerning the above motions or the issues decided by the appealed orders.
7. The final order granting Respondent John R. C. Bowen summary judgment.
8. The final order granting Respondent Kori Brett McKeithan's Rule 12(b)(6) motion to dismiss.
9. Any notices of hearing, hearing rosters, scheduling notices, and any related court communications concerning the motions resolved by the appealed orders.
10. The transcript of every hearing, motion hearing, status hearing, argument, or other proceeding at which the circuit court considered, discussed, or ruled upon any matter relevant to the appealed orders, including specifically: (a) the hearing on Respondent Bowen's motion to dismiss and/or motion for summary judgment; (b) the hearing on Respondent McKeithan's motion to dismiss; and (c) any hearing at which the circuit court orally explained or supplemented the basis for either appealed order.
11. All exhibits introduced, referenced, proffered, marked, tendered, or otherwise presented at any hearing relevant to the appealed orders, whether admitted or excluded.
12. Any correspondence, notices, closing documents, disbursement records, and filed materials concerning the January 2025 disbursement of \$15,665.73 from sale proceeds, to

the extent contained in the lower court record or filed in connection with the motions at issue.

13. Any filed documents, exhibits, and attachments concerning: (a) the alleged judgment lien or the absence of a perfected lien; (b) the ownership of the vessel referred to as “Papa Grace”; (c) the dissolution and reinstatement of Benny Hudson Seafood Corp.; and (d) the transfer or disbursement of sale proceeds at issue in this action.
14. The register of actions, docket sheet, case history, and all entries in the lower court file for Beaufort County Case No. 2025-CP-07-00718.
15. The entire clerk's record, whether or not specifically itemized above, including all pleadings, motions, memoranda, exhibits, orders, notices, correspondence made part of the file, and any other paper or matter filed in the lower court that may bear upon the issues presented on appeal.
16. Any additional matter that the Court of Appeals or the clerk of court determines should be included for a full and fair review of the issues presented.

Appellant specifically designates the entire lower court file to prevent the omission of any pleading, exhibit, order, notice, or transcript bearing upon the questions presented in this appeal.

Respectfully submitted,

s/ Geraldine White
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March 25, 2026