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Jun 30 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Beaufort County
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2025-002399
Circuit Court Case No. 2025-CP-07-00718

Geraldine White,

Appellant

v.

John R. C. Bowen and Kori Brett McKeithan,

Respondents.

**SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE
INITIAL BRIEF OF RESPONDENT JOHN R. C. BOWEN**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Respondent John R. C. Bowen

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent, John R. C. Bowen, by and through undersigned counsel, pursuant to Rule 263(b), SCACR, and respectfully moves for a second extension of thirty (30) days within which to file and serve his Initial Brief and corresponding Designation of Matter to be Included in the Record on Appeal. In support thereof, Respondent states:

1. By Order filed April 30, 2026, this Court permitted Appellant to file a corrected Initial Brief and Designation of Matter and further ordered that, to the extent Respondent John R. C. Bowen seeks to file a Respondent's brief, his deadline to serve and file an Initial Brief and Designation of Matter would expire thirty (30) days from the date of that Order.
2. Based on that Order, Respondent's deadline to file and serve his Initial Brief and Designation of Matter fell on June 1, 2026.
3. On June 1, 2026, Respondent filed a Motion for Extension of Time seeking an additional thirty (30) days, through July 1, 2026, within which to file and serve his Initial Brief and Designation of Matter. That motion remains pending before the Court.
4. In the event the Court grants Respondent's previously filed Motion for Extension, Respondent respectfully seeks an additional thirty (30) days beyond the first requested extension.

Due to counsel's existing professional obligations, including competing litigation deadlines and briefing commitments, additional time is necessary to adequately prepare Respondent's Initial Brief and corresponding Designation of Matter. This request is made in good faith and not for purposes of delay, and Respondent respectfully submits that the requested extension will not unduly prejudice any other party.

WHEREFORE, Respondent John R. C. Bowen respectfully requests that this Honorable Court grant an additional thirty (30) days within which to file and serve his Initial Brief and corresponding Designation of Matter. If the Court grants both Respondent's June 1, 2026 Motion for Extension of Time and the instant Motion, Respondent's deadline would be extended through July 31, 2026, based upon undersigned counsel's calculation.

Respondent further respectfully requests that the current briefing deadline be held in abeyance pending the Court's resolution of the pending Motion for Extension of Time and this Motion.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Graydon V. Olive, IV*
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Charleston, South Carolina

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Appellant

v.

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Respondents.

PROOF OF SERVICE

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Attorneys for Respondent John R. C. Bowen

I, Graydon V. Olive, IV, of Clement Rivers, LLP, attorneys for Respondent John R. C. Bowen, hereby certify that their **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT JOHN R. C. BOWEN** was served on all other parties to this appeal on June 30, 2026, via email (see attached) or US mail to their following parties/counsel of record:

Joseph DuBois, joe@libertyoaklaw.com
Liberty Oak Law Firm, LLC
Attorney for Kori Brett McKeithan

Geraldine White, whitegeraldine91@gmail.com
141 Lamotte Drive #A3
Hilton Head Island, SC 29926
pro se Appellant

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Graydon V. Olive, IV
Graydon V. Olive, IV (SC Bar No. 105319)
Attorneys for Appellants

Charleston, South Carolina

June 30, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Tuesday, June 30, 2026 11:54 AM
To: joe@libertyoaklaw.com; Geraldine White
Cc: Brown, Stephen L.; Olive, IV, Graydon
Subject: Appeal 2025-002399 - White v. Bowen - MFE - CR250372 - service email
Attachments: White Motion.pdf

Attached, please find a Motion for Extension being filed today in the above-referenced matter. This is also being sent by US Mail to Ms. White at 141 Lamotte Drive, #A3, Hilton Head Island, SC 29926.

Thank you,

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