

**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.

**REPLY TO APPELLANT'S OPPOSITION TO RESPONDENT'S MOTION TO
EXPEDITE APPEAL**

CLEMENT RIVERS, LLP
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TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Respondent John R. C. Bowen, by and through his undersigned counsel, respectfully submits this Reply to Appellant's Opposition to Respondent's Motion to Expedite Appeal.

ARGUMENT

I. Prejudice is not speculative.

The record demonstrates that Ms. White does not genuinely dispute the judgment's enforceability. In January 2025, Ms. White appeared in person to execute closing documents and knowingly consented to applying her share of the proceeds from that closing to partially satisfy the 2018 judgment. Ms. White received advance written notice of the disbursement and had a full month to object. Ms. White took no action to challenge that disbursement.

Ms. White filed this lawsuit only when a second parcel was scheduled for sale and a second, larger disbursement loomed. The circuit court heard testimony that Ms. White then transferred her interest in that second parcel to her sister for ten dollars to evade enforcement. Appellant is engaging in strategic delay and asset transfers to frustrate enforcement of the 2018 judgment. Continued delays could prejudice Respondent's ability to enforce the 2018 judgment.

II. Respondent did not create the urgency.

Ms. White's argument that Respondent created the timing problem by requesting extensions to file their initial brief collapses under scrutiny. Respondent's extensions were routine, unopposed, and well within the normal appellate process. Requesting additional time to file a brief is not delay; it is responsible advocacy.

In fact, Ms. White has purposefully created the urgency. Ms. White filed this action on March 24, 2025—seven years after the 2018 judgment—to frustrate the enforcement of the 2018

judgment she had already begun satisfying. Ms. White has strategically chosen procedural paths that maximize delay to circumvent enforcement of the 2018 judgment.

III. Expedited review would not prejudice Ms. White.

Ms. White's argument that she will be prejudiced by an expedited appeal has no merit. All parties have already filed their initial briefs setting forth their legal theories, factual contentions, and requested relief. The record is close to complete for appellate review. All that remains is reply briefing—if any—and consideration by the Court. There is no reason to allow months of additional delay once the record is complete.

IV. The merits strongly favor Respondent and warrant swift affirmance.

The circuit court's order granting summary judgment rests on two independent, well-established legal grounds. First, the court held that the 2018 judgment is valid and binding, and one circuit judge may not set aside the order of another circuit judge. Second, the court held that Respondent is immune from third-party liability for actions taken within the scope of his representation of his client. Both holdings are straightforward applications of South Carolina law. Ms. White does not challenge these legal principles on appeal: she simply disagrees with their application to facts that are undisputed in the record. Because the legal and factual issues are straightforward and strongly favor Respondent, this appeal is ideal for expedited review.

CONCLUSION

Ms. White exhausted every procedural avenue to challenge the 2018 judgment and now seeks to frustrate the enforcement of that judgment through any means necessary, including appellate delay. The circuit court properly granted summary judgment on two independent grounds rooted in well-settled South Carolina law. The legal and factual issues are straightforward, and all parties have briefed their positions. Ms. White would not be prejudiced

by expedited review. Accordingly, Respondent respectfully request that this Court Grant Respondent's Motion to Expedite Appeal.

[Signature page for Reply to Appellant's Opposition to Respondent's Motion to Expedite Appeal, Civil Action No. Appellate Case No. 2025-002399]

Respectfully submitted,

CLEMENT RIVERS, LLP

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August 17, 2026

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PROOF OF SERVICE

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SC Court of Appeals

I, Graydon V. Olive, IV, of Clement Rivers, LLP, attorneys for Respondent John R. C. Bowen, hereby certify that the **REPLY TO APPELLANT'S OPPOSITION TO RESPONDENT'S MOTION TO EXPEDITE APPEAL** was served on all other parties to this appeal on August 17, 2026, via US mail to their following parties/counsel of record:

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pro se Appellant

Respectfully submitted,
CLEMENT RIVERS, LLP

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Charleston, South Carolina

August 17, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Monday, August 17, 2026 2:14 PM
To: 'whitegeraldine91@gmail.com'; 'joe@libertyoaklaw.com'
Cc: Brown, Stephen L.; Olive, IV, Graydon; Davis, Jay; Grevey, Kara S.; Hines, Russell
Subject: Appeal 2025-002399 – White v. Bowen – CR250372 – Reply to Opposition to Motion
Attachments: White Reply to Opp to Motion.pdf

Attached for service on you in the above-referenced matter, please find Respondent John R. C. Bowen's **Reply to Appellant's Opposition to Respondent's Motion to Expedite Appeal**. A paper copy is being sent to you by US Mail.

Thank you,

Aimee Justman
Paralegal and Group Coordinator
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August 17, 2026

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Re: Geraldine White v. John R. C. Bowen and Kori Brett McKeithan
Appeal Case No.: 2025-002399
Underlying Case No.: 2025-CP-07-00718
Claim No.: B2515212
YCR File: 16109-20250372

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Aug 17 2026

Dear Ms. White and Mr. DuBois:

SC Court of Appeals

Enclosed for service on you in the above-referenced matter, please find a copy of Respondent John R. C. Bowen's **Reply to Appellant's Opposition to Respondent's Motion to Expedite Appeal** being filed with the court on August 17, 2026.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Aimee M. Justman
Legal Assistant

/amj
Enclosures