

**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,

v.

John R. C. Bowen and Kori Brett McKeithan,

Appellant

Respondents.

MOTION TO ALLOW LATE FILING

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Kara S. Grevey (SC Bar No. 101742)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Respondent John R. C. Bowen

RECEIVED
Aug 25 2026
SC Court of Appeals

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

Respondent, John R. C. Bowen , by and through his undersigned counsel, respectfully moves this Court pursuant to allow late filing for his Reply to Appellant's Return to Respondent's Motion to Expedite.

In support of this Motion, Respondent states as follows:

1. On August 4, 2026, this Court notified the parties that Appellant's Return to Respondent's Motion to Expedite was deficient.
2. This Court accepted Appellant's deficiency correction on August 10, 2026.
3. The undersigned counsel believed that the time to file a reply did not begin until Appellant's deficiency was corrected.
4. Consistent with that understanding, Respondent filed his Reply to Appellant's Return to Respondent's Motion to Expedite on August 17, 2026.
5. On August 18, 2026, this Court informed the undersigned counsel that the reply was deficient because it was untimely filed.
6. Respondent files this Motion and respectfully asks this Court to consider the reply despite its untimely filing due to the mistaken believe about when the time period began.

(signature on following page)

*[Signature page for Motion to Allow Late Filing,
Civil Action No. Appellate Case No. 2025-002399]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*

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Attorneys for Respondent John R. C. Bowen

Charleston, South Carolina

August 25, 2026

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PROOF OF SERVICE

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I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondent John R. C. Bowen, hereby certify that their **MOTION TO ALLOW LATE FILING** was served on all other parties to this appeal on August 25, 2026, via email (see attached) and 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/Stephen L. Brown
Stephen L. Brown (SC Bar No. 66468)
Attorneys for Appellants

Charleston, South Carolina

August 25, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Tuesday, August 25, 2026 12:51 PM
To: 'whitegeraldine91@gmail.com'; 'joe@libertyoaklaw.com'
Cc: Brown, Stephen L.; Davis, Jay; Grevey, Kara S.; Hines, Russell; Olive, IV, Graydon
Subject: Appeal 2025-002399 – White v. Bowen – CR250372 – Motion to Allow Late Filing
Attachments: White - Ltr to COA.pdf; White - Motion.pdf

Attached for service on you in the above-referenced matter, please find a letter and Motion to Allow Late Filing.

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
Clement Rivers, LLP
Phone: (843) 720-5460
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SC Court of Appeals



CLEMENT RIVERS, LLP

ATTORNEYS AT LAW

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August 25, 2026

VIA EMAIL AND US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Aug 25 2026

SC Court of Appeals

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

Dear Ms. Kitchings:

We are in receipt of the Court's August 18, 2026 letter in the above-referenced appeal advising that the reply to the return to the motion to expedite was deficient because it was untimely filed. It was our understanding that the period did not begin to run until the appellant corrected her deficiency with her return.

If we were mistaken, please find enclosed our firm's check representing the filing fee for our **Motion to Allow Late Filing**, which was electronically filed on August 25, 2026, in the above-referenced matter.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Aimee M. Justman
Legal Assistant

/amj

Enclosure (check by US Mail only)

cc: Geraldine White