

Exhibit D

Saralyn O'Leary

From: John Bowen <john@laughlinandbowen.com>
Sent: Wednesday, December 11, 2024 2:51 PM
To: Saralyn O'Leary; Joseph DuBois
Cc: Susan Vogel
Subject: RE: Hudson v White

Importance: High

RECEIVED**Sep 28 2026****SC Court of Appeals**

Saralyn:

Thanks very much for your e-mail.

Ms. White is confused. There are no "terms" with which she can agree, and the property cannot be sold unless/until we are paid. The judgment will be only partially satisfied from the proceeds of sale of this property, and the remaining balance of the judgment will continue to draw compound interest until the full balance is paid or the judgment expires. The property being sold will not be released from the judgment absent confirmation of the amount of net proceeds due Ms. White and payment of the net proceeds due to our office.

As I told Joe previously in my e-mail of November 12, 2024, my client has agreed to allow me to release the judgment lien only as to this property and to file a partial satisfaction of judgment in return for payment of 100% of the proceeds due to Ms. White. This is something that I am in any case required to do by law if a partial payment is made, and the partial satisfaction is also filed of record with the court. If you will please send us a copy of the completed settlement statement showing the details of the transaction and the amount of net proceeds to which Ms. White will be entitled, I will be happy to send you a letter confirming that we will release the property and file a partial satisfaction upon our receipt of the payment.

As I also told Joe, and while I do not know who the other 9 heirs are, I believe that there were 13 children some of whom have now passed away. Please be advised that there is a very substantial judgment against any interest in the Estate that Craig White may have had as well.

Thanks again,

JRCBV

John R.C. Bowen

Laughlin & Bowen, P.C.

P.O. Drawer 21119

Hilton Head Island, SC 29925

Office: (843) 689-5700

FAX: (843) 689-9300

Cell: (843) 384-3561

E-Mail: john@laughlinandbowen.com

NOTICE:

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Laughlin & Bowen, P.C. Unauthorized use, disclosure, or copying of this communication or any part thereof is strictly prohibited. If you have received this communication in error, please notify the sender immediately either by return e-mail or by telephone at 843-689-5700, and destroy this communication and all copies thereof, including all attachments.

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Exhibit E

testimony on the damages. Appearing at the hearing were John R.C. Bowen, Esquire, counsel for the plaintiff, as well as the plaintiff's president, Barbara Hudson. No appearance was made by the defendants or any counsel on their behalf.

8. Ms. Hudson testified that she is the president of the plaintiff corporation, and that she has been actively involved in its operation and management since approximately 1973. She further testified that she had denied defendants' request to place their thirty-five foot (35') boat at her dock, and that while she was away from Hilton Head during the mandatory evacuation for Hurricane Matthew, Mr. White brought the boat to plaintiff's dock, and tied it to the dock where it sank. She then testified that she had contacted Geraldine White and Craig White on numerous occasions thereafter to demand that the boat be removed, however they had made no effort to remove the wreck which was blocking her commercial dock and rendering it inaccessible to other vessels.

9. Ms. Hudson introduced an estimate to remove the defendants' boat from ShoreShapers, Inc. of Charleston, SC in the amount of \$25,000.00, and this exhibit was admitted into evidence.² She further testified that the company had incurred total damages of \$146,880.00 as a result of the defendants' gross negligence, and delineated as follows:

- A. Lost earnings from dockage charges - \$12,880.00
- B. Lost Revenue on shrimp sales - \$104,000.00³
- C. Cost of wreck removal - \$30,000.00

² This estimate was based on the removal of two boats; however Hudson testified that if only the White boat was removed, the cost would be \$30,000.00.

³ She testified that this figure was derived from the average catch of 1,000 lbs per week delivered to her dock by the average shrimp boat. Since her dock has been unavailable as of this date for 52 weeks of the 2016, 2017, and 2018 seasons, 52,000 lbs. of product had to be purchased elsewhere at a cost of \$2.00 per pound more for a total loss of \$104,000.00.

EXHIBIT LIST FOR ADMINISTRATIVE/JUDICIAL NOTICE AND TIMELINE OF EVENTS FOR THE RECORD

- Exhibits. #1-4a: May 23, 2015 -Corporate forfeited; Benny Hudson Seafood Corporation lost its legal existence under S.C. Code § 33-14-210;
- Exhibits#9-9M: April 16, 2018 2:02 PM - John R.C. Bowen filed a Lawsuit representing Benny Hudson Seafood Corp vs. Mark Henry Mineau/Mineur owner of Vessel/boat (OA Bloxon USCG #130945); Case #2018CP0700792;
- Exhibits#12-12D: April 16, 2018 2:14 PM - John R. C Bowen filed a lawsuit representing Benny Hudson Seafood Corp, vs. GEARLDINE WHITE AND CRAIG WHITE Case #2018CO0700793
- Exhibit# 24-24g: On August 22, 2018 4:18 PM Order of Judgment was granted by Default electronically signed by Judge Marvin H Dukes, III
- Exhibit# 25-25a: October 17, 2018 - Letter from Patrick Carr stating that "We mistakenly assumed that both of you were parties to the same lawsuit with identical procedural posture. We concluded that our firm is unable to represent you and Craig".
- Exhibit# 32-32d: April 17, 2018 4:09 PM - William M. Bowen (Brother of John R.C. Bowen) filed a lawsuit representing Benny Hudson Seafood Corporation vs. MARTIN GOVAN owner of VESSEL (Josie N.III USCG #526649) 2018CP0700804
- Exhibit# 34-34a: October 8, 2018 3:29 PM - Affidavit of Charles C. Abner
- Exhibit #73: January 13, 2025 - letter from Liberty Oak Saralyn O'Leary wired money to Laughlin & Bowen
- Exhibit #76-76b: Settlement Statement reflects monies converted to John R C Bowen via wire transfer \$15,665.73 plus Judgment Partial Release \$500 paid to Liberty Oak plus
- Exhibits #79-79b October 8, 2018 - Consent Order substituting Patrick Carr for Vaux
- Exhibits#80-80L Third Party Complaint and Summons I'm being sued by Govan
- Exhibits 81-81i August 22, 2019 Answer to Third Party Complaint

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT	)	CASE NO. 2018- CP-07-00804
	)	
BENNY HUDSON SEAFOOD CORP.	)	
	)	
Plaintiff,	)	
	)	PLAINTIFF'S NOTICE OF WITHDRAWAL
	)	OF MOTION FOR INJUNCTIVE RELIEF
	)	
MARTIN GOVAN,	)	AND
	)	
Defendant,	)	DEMAND FOR JURY TRIAL
	)	

TO: PATTICK CARR, ESQ. ATTORNEY FOR DEFENDANT:

You will please take notice that William M. Bowen, the undersigned, hereby withdraws Plaintiff's Motion for Injunctive relief and Demands Trial by Jury.

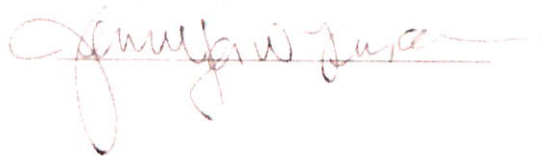
WILLIAM M. BOWEN, P.A.

By: */s/ William M. Bowen*
William M. Bowen
Attorney for Plaintiff
P. O. Drawer 6128
Hilton Head, SC 29938
(843) 842-5000

November 13, 2018
Hilton Head, South Carolina

CERTIFICATE OF MAILING

I, the undersigned, an employee of William M. Bowen, P. A., certify that on November 13, 2018, I sent a copy of the above to counsel for Defendant of record by electronic delivery addressed to him at his address of record as reflected on the pleadings on file in this case.



STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF BEAUFORT	)	
	)	
BENNY HUDSON SEAFOOD CORP.,	)	C/A No.: 2018-CP-07-00804
	)	
Plaintiff,	)	
	)	
vs.	)	DEFENDANT'S MOTION TO DISMISS
	)	OR IN THE ALTERNATIVE
MARTIN GOVAN,	)	MOTION TO CONSOLIDATE
	)	
Defendant.	)	

YOU WILL PLEASE TAKE NOTICE that ten (10) days after service hereof, or as soon thereafter as undersigned counsel may be heard, Defendant Martin Govan, will move for an Order granting dismissal of this action pursuant to Rule 12(b)(6), Rule 12(b)(7), and Rule 19, SCRCP, upon grounds that Plaintiff has failed to join a necessary and indispensable party without whom complete relief could not be afforded nor justice rendered between and among these parties, and upon further grounds that the Plaintiff's Complaint in this action fails to state a valid cause of action against this Defendant, as the powers to regulate the public waterways of this State are matters for the executive or legislative branches of government rather than the judicial branch, and the statutes relied upon by Plaintiff herein do not afford a private civil cause of action.

Alternatively, Defendant will move for an Order to consolidate the present case with the Plaintiffs' other similar actions that are already pending in the Beaufort County Court of Common Pleas, specifically those actions bearing Civil Action No. 2018-CP-07-0793 (Benny Hudson Seafood Corp. v. Geraldine White and Craig White) and Civil Action No. 2018-CP-07-00792 (Benny Hudson Seafood Corp. v. Mark Henry

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Mineau), pursuant to Rule 42(a), SCRCP.

Defendant's motion to dismiss or consolidate is based upon grounds that the Plaintiff already has filed three separate lawsuits (as referenced above) against various vessel owners for damages associated with sunken vessels at their commercial dock. These actions necessarily involve common questions of law and fact, and the risk of inconsistent liabilities and also perhaps double recovery of damages (if any are legally cognizable) are undeniable with three lawsuits against three separate vessel owners at or near the same dock location. Specifically, in the other actions pending in the Beaufort County Court of Common Pleas (2018-CP-07-0793 and 2018-CP-07-0792), this same Plaintiffs assert claims arising from the same hurricane storm October 8, 2016, which sank multiple boats anchored off Plaintiff's dock. In the present case, bearing Civil Action No. 2018-CP-07-00804, Plaintiff asserts the same or similar claims arising from the same incident against Defendant Govan, while knowing that the removal of the Govan vessel is a physical impossibility without the prior removal of the adjacent vessel owned by Defendants White.

By filing three separate civil actions arising from the same set of facts or occurrences, the Plaintiff herein has failed to join a necessary and indispensable party without whom complete relief could not be afforded between and among these parties. Therefore, this Court should either dismiss the present action without prejudice, or in the alternative, order consolidation of the three civil actions or joinder of the other vessel owner Defendants as parties to this action, pursuant to Rule 19, SCRCP, and all other applicable law.

Further by way of motion to dismiss pursuant to Rule 12(b)(6), Defendant Govan

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reiterates his argument that this Court lacks subject matter jurisdiction in this action and the Plaintiff's Complaint fails to state sufficient facts to give rise to a private cause of action, as the powers and obligations to regulate the public waterways in this State are reserved for the executive and legislative branches, and the statutes relied upon by Plaintiff herein are for law enforcement action only without the creation of a private cause of action. In addition, the Plaintiff's claim for breach of contract, if any, fails by reason of the statute of frauds.

For the reasons set forth herein, Defendant Govan respectfully requests an Order of this Court dismissing the present action without prejudice, or alternatively, for an Order joining this action with the other civil actions previously filed by this Plaintiff arising from the same sets of facts and occurrences.

This motion is based upon the pleadings, the statutory and common law of the State of South Carolina, the applicable South Carolina Rules of Civil Procedure, supporting memoranda which will be filed separately with the Court, and oral argument presented at the corresponding hearing of this motion.

October 31, 2018

Hilton Head Island, South Carolina

/s/ Patrick W. Carr
Patrick W. Carr, Esquire
SC Bar No. 15585; Fed. I.D. No. 07190
BERRY & CARR, P.C.
Attorneys at Law
2 Spanish Wells Road
Hilton Head Island, SC 29926
Phone: (843) 686-5432
Facsimile: (843) 785-6173
E-mail: patrick@hiltonheadlawyers.com
Attorneys for Defendant, Martin Govan

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STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
C/A No.: 2018-CP-07-00804

BENNY HUDSON SEAFOOD CORP,

Plaintiff,

v

MOTION FOR RELIEF OF
JUDGMENT

MARTIN GOVAN,

Defendant,

And

MARTIN GOVAN,

Third Party Plaintiff,

V

CRAIG WHITE AND GERALDINE WHITE

Third Party Defendants.

TO: PATRICK W. CARR, ESQ. ATTORNEY FOR THIRD PARTY PLAINTIFF,
AND

TO: WILLIAM M. BOWEN, ESQ. ATTORNEY FOR PLAINTIFF

The Third Party Defendant, Geraldine White, through her undersigned attorney, who respectfully moves this Honorable Court, for the following relief pursuant to the South Carolina Rules of Civil Procedure, Rule 60(b)(1) and (3).

The movant requests the court to set aside its order of May 9, 2022 that requires the Defendant's counsel to petition the Beaufort County Probate Court to appoint an Administrator for the Estate of Criag White, deceased, who was a Third Party co-

defendant in this case. This Order in part states that Counsel did not object to the motion for this order brought by the Defendant and Third Party Plaintiff, Martin Govan.

First, this is a mistake. On May 3, 2022 Counsel did send a reply email to the Chambers of the Hon. James McCoy, presiding judge, through his law clerk specifically noting his objection to the motion. A copy of this reply e-mail is attached hereto as Exhibit 1.

Second, there are multiple other and further grounds for setting this order aside.

1 Counsel solely represents the third party defendant Geraldine White and never has represented Craig White.

2 Representing Craig White or his estate would create a conflict of interest with counsel's representation of Geraldine White

3 The defendant Martin Govan would qualify as a potential creditor of the estate and have priority over the third party defendant Geraldine White who would not qualify as an Administrator.

4. The defendant Craig White has not answered to the Complaint of Martin Govan and stood in default for an extended period of time prior to his demise. Defendant Govan's counsel would only need to file a motion for default judgment against Craig White and no letters of administration would be required for the purposes of continuing this case at this time.

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5 Counsel lacks sufficient knowledge concerning Craig White and his heirs to petition the Probate Court and give notices to the proper parties of interest.

6 Craig White may have died testate with a Will waiting to be probated.

7 It was Martin Govan the movant for the Order herein who brought this action against Craig White in court not Geraldine White and therefore he should be responsible for keeping him in court, if he desires, beyond the grave.

8. There is lack of information to form a belief rather there are sufficient or any assets within the estate of Craig White to cover the expense of Administration or probate.

9. Martin Govan, as a unliquidated creditor would have better standing and priority to serve as the administrator of the estate of Craig White than the co-defendant Geraldine White.

Respectfully submitted,

The Houston Law Firm LLC
1000 Main Street, Suite 200C
Hilton Head Island, SC 29926
chouston@houstonlawfirm.net

By: S/ Charles E. Houston, Jr.
Charles E. Houston, Jr.
SC Bar # 2663
Attorney for Geraldine White
Third Party Defendant

May 30, 2022
Hilton Head Island, SC

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT	)	CASE NO. 2018- CP-07- 00804
	)	
BENNY HUDSON SEAFOOD CORP	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
MARTIN GOVAN,	)	MOTION FOR PARTIAL
Defendant,	)	SUMMARY JUDGMENT
	)	
AND	)	
	)	
MARTIN GOVAN,	)	
Third-Party Plaintiff,	)	
Vs.	)	
	)	
CRAIG WHITE and GERALDINE WHITE	)	
Third-Party Defendants.	)	

TO: Patrick W. Carr, Esq:

You will please take notice that William M. Bowen, the undersigned, will move the Presiding Judge of the Fourteenth Judicial Circuit, at the Beaufort County Courthouse, Beaufort, South Carolina, at 10:00 AM on the tenth day after service hereof or as soon thereafter as this matter may be set, for partial summary judgment as to the Defendant Govan for the relief sought by the allegations of Complaint as to the condition, location, and duration of presence of Defendant's boat at Plaintiff's dock the leaving a determination of Plaintiff's damages and matters of the 3rd Party Complaint for trial.

This motion is made pursuant to Rule 56, SCRCF, and the law in cases made and provided.

The undersigned hereby certifies that he, prior to filing the above motion, has communicated, orally or in writing, with opposing counsel and has attempted in good faith to resolve the matter contained in the motion, or that such consultation would serve no useful purpose.

WILLIAM M. BOWEN, P.A.

S/William M. Bowen

S.C. Bar No. 794

Attorney for the Plaintiff

52 New Orleans Road, Suite 202

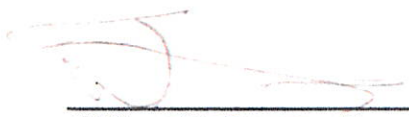
Hilton Head Island, SC 29928

843-842-5000

wilbowbb@hargray.com

Hilton Head Island, South Carolina
October 21, 2019

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William M. Bowen, Esquire
WILLIAM M. BOWEN, P.A.
S.C. Bar No.: 794
52 New Orleans Road, Suite 202
Hilton Head, SC 29928
Telephone: (843)842-5000
Email: wilbowbb@hargray.com
*Attorney for Plaintiff Benny Hudson
Seafood Corp.*

Dated: This 17th day of September 2019.

Beaufort, South Carolina

Exh 34

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

BENNY HUDSON SEAFOOD CORP,

Plaintiff,

vs.

MARTIN GOVAN,

Defendant.

IN THE COURT OF COMMON PLEAS

C/A No.: 2018-CP-07-00804

AFFIDAVIT OF CHARLES ABNER

Personally appeared before me, Charles C. Abner, who being duly sworn, deposes and states the following under oath:

1. I am a United States citizen over the age of eighteen (18) years, of sound mind and body, and otherwise fully competent to make this statement under oath.
2. All of the information contained in this Affidavit is being given freely and voluntarily, and is based upon my own personal knowledge.
3. I am a resident of the State of Florida residing at 11169 Lothmore Road, Jacksonville, Florida 32221.
4. I previously owned a shrimp boat known as the "Lady Bernice" which was moored or docked at Benny Hudson Seafood near 175 Squire Pope Road on Hilton Head Island, South Carolina.
5. My boat was docked at this location during Hurricane Matthew in October 2016, and I was actually on my boat during the storm passage.
6. My boat was docked and tied bow to bow with Martin Govan's boat known as "Josie N."
7. During the storm I was sitting in the captain's seat the entire time on my boat.

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CEA

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Exh 34a

8. During the storm I noticed that the stern of the "OA Bloxom" boat was docked and moored next to the stern of the "Josie N" boat.
9. During the storm I watched the stern of the "OA Bloxom" repeatedly crash into and tear off the stern of the "Josie N." causing it to sink.
10. Prior to the occurrence of Hurricane Matthew, I noticed another boat named "Papa's Grace" owned by Geraldine White and Craig White was tied to the starboard side of the Govan boat known as "Josie N," and I watched the "Papa's Grace" boat also sink during the storm.
11. Based upon my observations, it is obvious to me that the "Josie N" boat and the "Papa's Grace" boat would not have sunk had they been tied up differently.
12. Based upon my observations, it is obvious to me that the "Josie N" boat and the "Papa's Grace" boat would not have sunk if the "OA Bloxom" boat would have been turned around or not moored so closely to the others, and had the stern of the "OA Bloxom" boat not been permitted tear off the stern of the "Josie N" boat.
13. I have been in the shrimping and boating industry for more than forty (40) years.
14. A copy of this Affidavit has been provided to me on this date, October 8, 2018.

FURTHER AFFIANT SAYETH NOT.

Charles C. Abner
CHARLES C. ABNER

Sworn to and subscribed before me,
this 8th day of October, 2018.

Pamela H. Edwards
NOTARY PUBLIC





BERRY & CARR

LUCAS M. DALLACK
lucas@hiltonheadlawyers.com

DAVID H. BERRY
david@hiltonheadlawyers.com

PATRICK W. CARR
patrick@hiltonheadlawyers.com

MICHAEL F. BENNETT
michael@hiltonheadlawyers.com

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: Corporate Center Park, Suite 100 • Hilton Head Island, SC 29926 • Phone: 843.686.5432 • Facsimile: 843.785.6173
 COURTHOUSE OFFICE: 1007 Lawyers Square • Beaufort, South Carolina 29901 • Phone: 843.725.0100 • Facsimile: 843.725.0101

WWW.HILTONHEADLAWYERS.COM

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judgment if not raised within one year from the entry of judgment (which here occurred on August 22, 2018).

We have contacted other lawyers in our area to see if they would be willing to assist you with representation in this matter, including Ben Shelton (843-681-7000) and Chris Lempesis (843-524-9500) and Troy Thames (843-284-0832) and Julian Allen (843-882-5505). So far, we have been unable to identify a lawyer who will take on your case without payment for their attorney fees. You may want to contact one of these attorneys and see if you can convince them to represent you and Craig White. You may also want to contact the South Carolina Bar Lawyer Referral Service at www.scbarr.org or 1-800-868-2284 to see if they can refer you to a lawyer who is willing to undertake representation for you. It is impossible to understate the importance of you taking immediate action to retain counsel to represent you in this matter; time is of the essence.

We are enclosing with this letter copies of all court pleadings on file with the Beaufort County Clerk of Court in this matter, along with complete copies of all file materials you delivered to our office. Keep all of these items together in a safe place and deliver them to your newly retained counsel as soon as possible.

Again, we regret we are unable to assist with this particular matter for you. We thank you for contacting our law firm, and we wish you all the best.

Sincerely,



Patrick W. Carr
Enclosures

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

Case # 18-00703

EXHIBITS

Plaintiff(s)

vs.

Defendant(s)

PLAINTIFF'S EXHIBITS

DEFENDANT'S EXHIBITS

COURT'S EXHIBITS

1 Estimate	1	1
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Court
Reporter

Clerk of Court

Trial Judge

Date

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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

labor.vaux@vmbllawfirm.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:

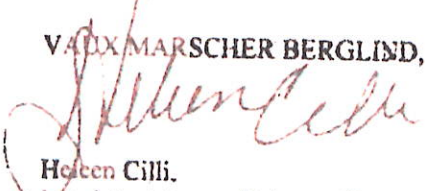
Enclosed please find the documents which we received on August 17, 2018 regarding the above matter which I am returning to you.

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.


Helen Cilli.

Legal Assistant to Roberts "Tabor" Vaux, Jr.

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OTHER OFFICES:

16 WILLIAM POPE DRIVE, SUITE 202
2000 MATIE, 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)

Vaux Marscher Berglund, PA
PO Box 769
Bluffton, SC 29910
Attn: Heleen Cilli

COMMON PLEAS
CLERK
SC 29910
41 AUG 13 2018
2:41 PM

FIRST CLASS



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

*From
E. Vaux*

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

25926-272013



Exhibit 22

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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. SCHWEDER, 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.

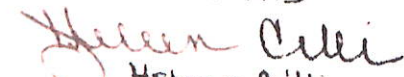
With kindest regards, I am

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.


Heleen Cilli
Paralegal to Roberts "Tabor" Vaux, Jr.

16 WILLIAM POPE DRIVE, SUITE 202
2800 KATIE, SOUTH CAROLINA 29909
(843) 785-2888 (OFFICE)
(843) 785-2889 (FAX)

OTHER OFFICES:

Roberts "Tabor" Vaux, Jr.

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

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

August 6, 2018

Attorney To Vaux,
Enclosed is copies requested.

Geraldine White

STATE OF SOUTH CAROLINA

) IN THE COMMON PLEAS COURT

2018 OCT 30 AM 10: 58

COUNTY OF BEAUFORT

) CASE NO.2018-CP-07-00793

FERRI ANN ROSENEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT

BENNY HUDSON SEAFOOD
CORP

Plaintiff/Petitioner

) DEFENDANT'S DECLARATION IN
) SUPPORT OF MOTION TO SET ASIDE
) ENTRY OF DEFAULT PURSUANT TO
) FED. R. CIV. P. 55(c))

)

) Hearing Date: August 21, 2018

) Hearing Time: 9:00 a.m

) Judge: Marvin H. Dukes, III

) Place: Beaufort County Court 2nd flr.

vs.

GERALDINE J WHITE AND CRAIG)

L. WHITE)

Respondent/Defendant(s))

I, Craig L. White, declare as follows:

1. I am the Defendant in the above-entitled case.
2. I have personal knowledge of the following facts, and, if called as a witness, I could and would competently testify thereto.
3. I became aware of this lawsuit on or around April 2018. I found out about this lawsuit because: I was served papers in regard to this lawsuit.
4. I responded to the lawsuit by taking the following actions:
 - a) Consulting several attorneys, Patterson, Patrick Carr and Robert Vaux, Jr.

5. My delay in filing a response to the lawsuit was not intentional. I did not file a timely formal response to the lawsuit for the following reasons: after consulting several attorneys, I was left with the impression that Patrick Carr was representing me. Days prior to the scheduled court hearing (August 21, 2018), I received a call from Patrick Carr's office informing me that I did not have to go to that hearing. I received another hearing date September 13, 2018.

6. The following facts support my defenses to this lawsuit: I, Craig L. White was given permission to dock the boat on Plaintiff's property by the manager Tonya Hudson, Rudy Simmons was witness to this effect. Defendants took proper action in seeking counsel, however, a mistake had occurred causing the Defendants to not appear for hearing, which resulted in default judgment being ruled against Defendants. Defendant secured transportation to hearing for August 1, 2018. Driver can testify to this fact.

7. I have no reason to believe Plaintiff will suffer prejudice if the Court grants this motion.

8. Please review the Motion and Memorandum of Points and Authorities in its entirety, I believe that the Court will agree and find in favor of Defendants, by vacating the default judgment.

I declare under penalty of perjury that the foregoing is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/29/2018, in Hilton Head Island, South Carolina.
(date of signing) (city, state of signing)

Craig L. White, Defendant in Pro Per

Craig L. White
Signature

Paul Hammond

Exhibit #2

File ID: 170331-1422363
Filing Date: 03/29/2017

STATE OF SOUTH CAROLINA
SECRETARY OF STATE

APPLICATION FOR REINSTATEMENT OF
A CORPORATION DISSOLVED
BY ADMINISTRATIVE ACTION

TYPE OR PRINT CLEARLY IN BLACK INK

Pursuant to Section 33-14-220 of the 1976 South Carolina Code of Laws, as amended, the undersigned hereby applies to the Secretary of State for reinstatement of a corporation dissolved by administrative action and for that purpose, submits the following information:

- The name of the corporation is Benny Hanson Searford Corp.
Date of incorporation December 10, 1992 Date of dissolution MAY 23, 2015
- Complete either "a" or "b", whichever is applicable.
 - ☐ Grounds for administrative dissolution did not exist.
 - ☒ The grounds for administrative dissolution, which were:
THE FAILURE TO FILE CERTAIN TAX RETURNS
With the South Carolina Department of Revenue
have now been eliminated.
- The corporation's name satisfies the requirements of Section 33-4-101 of the 1976 South Carolina Code of Laws, as amended.

Date MARCH 28, 2017

Benny Hanson Searford Corp.
Name of Corporation

Tony Hanson Searford
Signature

Tony Hanson Searford / President
Type or Print Name and Office

FILING INSTRUCTIONS

- Two copies of this form, one of which can be either a duplicate original or a conformed copy must be filed.
- Filing fee (Payable to the Secretary of State at the time of filing this application) - \$25.00
- THIS APPLICATION CAN BE FILED ANYTIME AFTER THE EFFECTIVE DATE OF THE CORPORATION'S DISSOLUTION BY ADMINISTRATIVE ACTION AND MUST BE ACCOMPANIED BY A CERTIFICATE FROM THE SOUTH CAROLINA DEPARTMENT OF REVENUE RECITING THAT ALL STATE TAXES, PENALTIES AND INTEREST OWED BY THE CORPORATION HAVE BEEN PAID.

Return to: Secretary of State
1205 Pendleton Street, Suite 525
Columbia, SC 29201

DOM-APP FOR REINSTATEMENT OF CORP DISSOLVED.doc

Form Revised by South Carolina
Secretary of State, September 2010

ELECTRONICALLY FILED - 2025 Nov 07 4:02 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0700804

100623 2016
 CERTIFIED TO BE A TRUE AND CORRECT COPY
 AS TAKEN FROM AND COMPARED WITH THE
 ORIGINAL ON FILE IN THIS OFFICE
 OCT 22 2025
 Mark Hammond
 South Carolina Secretary of State

FILED: 06/23/2016
 HENRY HUDSON SEAFOOD CORP.
 Filing Fee: \$0.00 ORIG

150523-0210 Filed: 5/23/2015
BENNY HUDSON SEAFOOD CORP.
Filing Fee: \$0.00
Mark Hammond South Carolina Secretary of State

Exhibit #1

STATE OF SOUTH CAROLINA
SECRETARY OF STATE
COLUMBIA, SOUTH CAROLINA

CERTIFICATE OF DISSOLUTION BY ADMINISTRATIVE DISSOLUTION

BENNY HUDSON SEAFOOD CORP.
171 SQUIRE POPE RD
HILTON HEAD ISLAND, SC 29926-1747

Date of Dissolution:
MAY 23, 2015
21143038

South Carolina Code of Laws §33-14-200 provides that the South Carolina Secretary of State's Office shall administratively dissolve a corporation for the following reasons:

- (1) The corporation does not pay any franchise taxes, taxes payable under Chapter 7, of Title 12, or penalties imposed by the law;
- (2) The corporation does not deliver its annual report to the Department of Revenue when it is due;
- (3) The corporation is without a registered agent or registered office in this state;
- (4) The corporation does not notify the Secretary of State that its registered agent or registered office has been changed, that its registered agent has resigned, or that its registered office has been discontinued; or
- (5) The corporation's period of duration stated in its articles of incorporation expires

Based on the records provided by the South Carolina Department of Revenue, it appears that after proper statutory notice, the above named corporation has failed to meet the requirements of (1) and/or (2) as set forth above.

Now therefore, under the authority of South Carolina Code of Laws §33-14-200, the above named corporation is administratively dissolved as of the date of this Certificate of Dissolution.

Mark Hammond
Mark Hammond
South Carolina Secretary of State

Inquiries concerning this administrative dissolution should be directed to the South Carolina Department of Revenue, Corporate Section, Columbia, SC 29214-0100 or (803) 896-1730.

ADM. DISSOLUTION (SS-02)

P.B. 00389
185

NIXLE 796 DE 1009 0000/25/15
RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

BC: 20201374525 *0554-05352-01-00
 |||||

234

142

Beaufort County Register of Deeds

Official Records Public Search

Verified as of 10/22/2025

Search results include verified documents only

[Help?](#)

Search () Results () Document ()

Party () Document Type () Instrument Number () Book/Page () District/Map/Parcel ()

Party Name

[Clear Last Search](#)

white geraldine

Last-Name First-Name (e.g., Smith AI), Company Name (e.g., Gulf Utility) Use no commas between the First and Last Names.

[Search](#)

Document Type (Optional)

BTLS,BTLW,MECH,MLA,MLMISC,MLPAREL,MLR,MLSAT,RELCB,SC,SCEX,SCPAREL,SCSAT,SCWD,TLMI

Use commas to separate codes for multiple doc type searches (ex. MTG) or select from groups below

- ☐ ALL
- ☐ DEED
- ☐ EASEMENT
- ☐ LIEN
- ☐ MORTGAGE

Date Range (Optional)

From

MM/DD/YYYY

To

MM/DD/YYYY

7 Days

30 Days

90 Days

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Beaufort County Register of Deeds

Party Name: white, geraldine Document Type:

BTLS,BTLW,MECH,MLA,ML MISC,MLPAREL,MLR,ML SAT,RELCB,SC,SCLX,SCPAREL,SCSAT,SCWD,TLMISC,UC M,UC MILIT

Total Number of Records: 4

Search Time: 10/24/2025, 06:15:44 PM

Verified as of 10/22/2025

Search results include verified documents only

Name	Cross Party	Date	Type	Instr#	Book	Page	Legal	Consideration
WHITE, GERALDINE		07/31/1996	USSA	1996002693	1996	1967	9600842	\$0.00
WHITE, GERALDINE	US INTERNAL REVENUE SERVICE	06/19/2007	USSA	2007037055	32	1000	35236607	\$0.00
WHITE, GERALDINE	US INTERNAL REVENUE SERVICE	03/07/1996	US	1996001115	1996	852		\$0.00
WHITE, GERALDINE	US INTERNAL REVENUE SERVICE	03/30/2007	US	2007025008	30	2481	35236607	\$0.00

233

145



Kori Brett McKeithan
Email: koribrett@libertyoaklaw.com

Joseph DuBois
Email: joe@libertyoaklaw.com

January 13, 2025

Ms. Geraldine White
141 Lamotte Drive
#A-3
Hilton Head Island, SC 29926

RE: Sale of Beach City Road Lot – R510-005-000-0010-0000

Dear Ms. White:

Please be advised that we have closed the above referenced transaction on your behalf. Enclosed please find a copy of your closing documents. Please note your proceeds have been wired to Laughlin & Bowen as a partial payment to judgment. It has been a pleasure working with you and we trust everything has been handled to your complete satisfaction. Should you need anything further, please do not hesitate to contact our office.

Sincerely,


Sarah B. O'Leary, Paralegal

Enclosures

71 Lighthouse Road, Suite 220
Hilton Head Island SC 29928

<https://libertyoaklaw.com>

phone 843.671.5550
fax 888.676.0445

Saralyn O'Leary

From: John Bowen <john@laughlinandbowen.com>
Sent: Wednesday, December 11, 2024 2:51 PM
To: Saralyn O'Leary; Joseph DuBois
Cc: Susan Vogel
Subject: RE: Hudson v White

Importance: High

Saralyn:

Thanks very much for your e-mail.

Ms. White is confused. There are no "terms" with which she can agree, and the property cannot be sold unless/until we are paid. The judgment will be only partially satisfied from the proceeds of sale of this property, and the remaining balance of the judgment will continue to draw compound interest until the full balance is paid or the judgment expires. The property being sold will not be released from the judgment absent confirmation of the amount of net proceeds due Ms. White and payment of the net proceeds due to our office.

As I told Joe previously in my e-mail of November 12, 2024, my client has agreed to allow me to release the judgment lien only as to this property and to file a partial satisfaction of judgment in return for payment of 100% of the proceeds due to Ms. White. This is something that I am in any case required to do by law if a partial payment is made, and the partial satisfaction is also filed of record with the court. If you will please send us a copy of the completed settlement statement showing the details of the transaction and the amount of net proceeds to which Ms. White will be entitled, I will be happy to send you a letter confirming that we will release the property and file a partial satisfaction upon our receipt of the payment.

As I also told Joe, and while I do not know who the other 9 heirs are, I believe that there were 13 children some of whom have now passed away. Please be advised that there is a very substantial judgment against any interest in the Estate that Craig White may have had as well.

Thanks again,

JRCBV

John R.C. Bowen

Laughlin & Bowen, P.C.

P.O. Drawer 21119

Hilton Head Island, SC 29925

Office: (843) 689-5700

FAX: (843) 689-9300

Cell: (843) 384-3561

E-Mail: john@laughlinandbowen.com

NOTICE:

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Laughlin & Bowen, P.C. Unauthorized use, disclosure, or copying of this communication or any part thereof is strictly prohibited. If you have received this communication in error, please notify the sender immediately either by return e-mail or by telephone at 843-689-5700, and destroy this communication and all copies thereof, including all attachments.



P. J. Tanner
Sheriff

EXH 55
OFFICE OF SHERIFF
BEAUFORT COUNTY
POST OFFICE BOX 1758
BEAUFORT, SOUTH CAROLINA 29901

AREA CODE (843) 117
SHERIFF 255-2200
CHIEF DEPUTY 255-3192
CRIMINAL RECORDS 255-3232
CRIMINAL WARRANTS 255-3220
CIVIL RECORDS 255-3188
JUDGMENTS 255-3188
FAX # 255-3105
WEB SITE www.bcs-net

January 18, 2020

John R. C. Bowen, Esquire
Post Office Drawer 21119
Hilton Head, South Carolina 29925

Re: Benny Hudson Seafood Corp. vs Geraldine White and Craig White
Judgment Roll Number: 2018CP0700793

Dear Sir or Madam:

This is to inform you that the above referenced Execution Against Property is being forwarded to the Clerk of Court for Beaufort County and stamped as follows:

"NULLA BONA" January 18, 2020. I hereby certify that, after diligent search, I have been unable to locate any property in the name of the defendant on which to levy and the within Execution is being returned to the Clerk of Court for Beaufort County, "NULLA BONA", as of this date.

Sincerely,

P.J. TANNER
SHERIFF

PJT/ct

Enclosure

cc: Clerk of Court

FILED - 2020 Jan 24 2:33 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0700793

ELECTRONICALLY FILED - 2025 Nov 07 4:02 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0700804

FILED ELECTRONICALLY FILED - 2020 Jun 24 2:33 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0700793

EXH 55A

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

)
) EXECUTION AGAINST PROPERTY
) JR#2018CP0700793

TO: THE SHERIFF OF THE COUNTY OF BEAUFORT, GREETINGS:

WHEREAS judgment was rendered on the 24th day of August, 2018, in an action in the matter of Benny Hudson Seafood Corp vs. Geraldine White and Craig White, in favor of the said Plaintiff against the said Defendants, for the sum of \$201,723.27, with interest from the date of judgment at the rate of eight and a half (8.50%) percent as appears to us by Judgment Roll No., filed in the Office of the Clerk of Court of Common Pleas, County of Beaufort,

AND WHEREAS, the said judgment was docketed in your County on the 24th day of August in the year Two Thousand and Eighteen and in the sum of \$201,723.27, plus interest thereon from the date of judgment, and such additional sums as may be further expended and approved by the Court for costs of suit, is now actually due thereon.

THEREFORE, WE COMMAND YOU, that you satisfy the said judgment out of the personal property of the said judgment debtor within your County, or if sufficient personal property cannot be found, then out of the real property in your County belonging to such judgment debtor on the day when the said judgment was so docketed in your County, or at any time thereafter, in whose hands whomsoever the same may be, and duly return this execution, according to law, to the Clerk of the Court of Common Pleas for the County of Beaufort.

WITNESS Jerri A. Roseneau, Clerk of said Court at Beaufort, South Carolina the day of September, 2018.

Clerk of Court
Beaufort County

John R. C. Bowen,
Plaintiff's Counsel

ELECTRONICALLY FILED - 2020 Jun 24 2 23 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0700793

NOTICE TO APPEAR
YOU ARE HEREBY NOTICED TO APPEAR IN COURT AT THE
BEAUFORT COMMON PLEAS COURT ON THE 24th DAY OF
JUNE 2020 AT 2:23 PM. YOUR FAILURE TO APPEAR
MAY BE CONSIDERED A VIOLATION OF THE COURT'S
ORDER AND MAY RESULT IN A WARRANT BEING
ISSUED FOR YOUR ARREST.

[Signature]

Shirley

SOUTH CAROLINA MAGISTRATE COURT
OF BEAUFORT COUNTY

STATE OF SOUTH CAROLINA)
COUNTY OF BEAUFORT)
BENNY HUDSON SEAFOOD CORP)
PLAINTIFF(S))
VS.)
GERALDINE WHITE AND CRAIG)
WHITE)
DEFENDANT)

AFFIDAVIT

Case No:2018-CP-07-00793

AFFIDAVIT OF RUDY SIMMONS

When I came to the dock, Tonya Hudson told me not to tie up near the oyster boat. She said tie up next the Georgian Boat.

After that we, Craig and I tie the boat up as told.

On around October 2016, Hurricane Matthew came through Hilton Head Island, South Carolina. I worked with Craig on the boat named Pappa Grace, which we parked at the dock of Benny Hudson's Seafood Corporation.

The boat was tied up properly. The storm, an act of God, destroyed the boat at the dock. I was given permission to tie up by Tonya Hudson.

Rudy Simmons
Rudy Simmons

Signature

Date

Sworn to before me this 24 day of October, 2016
Notary Public for South Carolina Signature of Affiant
My Commission expires 10/24/2020

SOUTH CAROLINA MAGISTRATE COURT
OF BEAUFORT COUNTY

STATE OF SOUTH CAROLINA)
COUNTY OF BEAUFORT)
BENNY HUDSON SEAFOOD CORP)
PLAINTIFF(S))
VS.)
GERALDINE WHITE AND CRAIG)
WHITE)
DEFENDANT)

AFFIDAVIT

Case No:2018-CP-07-00793

AFFIDAVIT OF CRAIG WHITE

On around October 2016, Hurricane Matthew came through Hilton Head Island, South Carolina. I had a boat named Pappa Grace parked at the dock of Benny Hudson's Seafood Corporation. I came in on Sunday night, it was dark we had a few shrimps, we were going home and was near the truck. Tonya Hudson approached the truck and she said, "Craig you can tie up but move from beside the oyster boat".

The next morning, I went to show her the shrimps. She it was too small. The boat was still at the dock. At that time, we discovered we had an oil leak. I call a mechanic, Buddy Darden. Buddy came and we had to order a pump. The storm was here, and the mechanic was not able to work.

The morning after the storm Charles Abner called and said the boat went under. The boat was tied up properly. The storm, an act of God, destroyed the boat at the dock. I was given permission to tie up by Tonya Hudson.

Craig White

Signature

Date

Sworn to before me this _____ day of _____, 20____
Notary Public for South Carolina Signature of Affiant
My Commission expires _____, 20____

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