

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

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Oct 12 2026
SC 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.

MOTION FOR LEAVE TO FILE SUPPLEMENTAL RECORD ON APPEAL

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)
Graydon V. Olive, IV (SC Bar No. 105319)
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Attorneys for Respondent John R. C. Bowen

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

COMES NOW the Respondent, John R. C. Bowen, by and through his undersigned counsel, and hereby respectfully requests this Honorable Court grant him leave to file the attached Supplemental Record on Appeal and to cite thereto in his Final Brief of Respondent, which is provisionally filed contemporaneously herewith.

Although the Record on Appeal prepared by the Appellant included most of the matter that the Respondent designated for inclusion, it did not include the following items which the undersigned proposes to include in the Supplemental Record on Appeal: (1) Summons and Complaint filed April 16, 2018 in Civil Action No. 2018-CP-07-00793; (2) Memorandum of Points and Authorities in Support of Motion to Set Aside Entry of Default Judgment Pursuant to Fed. R. Civ. P. 55(c), filed October 30, 2018 in Civil Action No. 2018-CP-07-00793; (3) Defendant's Declaration in Support of Motion to Set Aside Entry of Default Pursuant to Fed. R. Civ. P. 55(c) filed October 30, 2018 in Civil Action No. 2018-CP-07-00793; (4) Notice of Motion and Motion to Set Aside Entry of Default Judgment Pursuant to Fed. R. Civ. P. 55(c), filed October 30, 2018 in Civil Action No. 2018-CP-07-00793; and (5) Partial Satisfaction of Judgment, filed January 13, 2025 in Civil Action No. 2018-CP-07-00793.

The Respondent submits that there is good cause to grant the present motion, such motion being consistent with the interests of justice and not unduly prejudicial to any party.

WHEREFORE, the Respondent respectfully requests the proposed Supplemental Record on Appeal, of which one bound and one unbound copy are being filed herewith and all other parties to this appeal are being provided with a paper and/or electronic copy, be accepted as filed along with the Final Brief of Respondent, which cites thereto, and which is provisionally filed contemporaneously herewith.

*[Signature page for Motion for Leave to File Supplemental Record on Appeal,
Civil Action No. Appellate Case No. 2025-002399]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Graydon V. Olive, IV
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Kara S. Grevey (SC Bar No. 101742)
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Attorneys for Respondent John R. C. Bowen

Charleston, South Carolina

October 12, 2026

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Geraldine White,

Appellant

v.

John R. C. Bowen and Kori Brett McKeithan,

Respondents.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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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 **MOTION FOR LEAVE TO FILE SUPPLEMENTAL RECORD ON APPEAL** was served on all other parties to this appeal on October 12, 2026, via email (see attached) and will be placed in the US Mail on October 13, 2026¹ to their following parties/counsel of record:

Joseph DuBois, joe@libertyoaklaw.com
Liberty Oak Law Firm, LLC
71 Lighthouse Road, Suite 230
Hilton Head Island, SC 29928
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

October 12, 2026

¹ October 12, 2026 is a federal holiday and the US Postal Service is not accepting mail.

Justman, Aimee

From: Justman, Aimee
Sent: Monday, October 12, 2026 1:50 PM
To: 'whitegeraldine91@gmail.com'; 'joe@libertyoaklaw.com'
Cc: Brown, Stephen L.; Hines, Russell; Olive, IV, Graydon; Davis, Jay; Grevey, Kara S.
Subject: Appeal 2025-002399 – White v. Bowen – CR250372 – RFB, Motion, Supp ROA
Attachments: RFB.pdf; Cert for RFB.pdf; Motion for Leave.pdf; Supp ROA.pdf

Attached for service on you in the above-referenced matter, please find the following documents:

- 1) Final Brief of Respondent John R. C. Bowen
- 2) Certification for Final Brief of Respondent John R. C. Bowen
- 3) Motion for Leave to File Supplemental Record on Appeal
- 4) Supplemental Record on Appeal

A paper copy is being placed in the US Mail tomorrow for both of you, since today is a federal holiday.

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
Clement Rivers, LLP
Phone: (843) 720-5460
Fax: (843) 579-1385

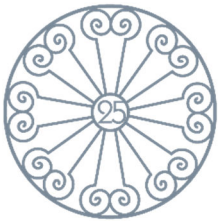


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SC Court of Appeals



CLEMENT RIVERS, LLP

ATTORNEYS AT LAW

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October 13, 2026

Geraldine White
141 Lamotte Drive, #A3
Hilton Head, SC 29926

Joseph DuBois, Esquire
Liberty Oak Law Firm, LLC
71 Lighthouse Road, Suite 220
Hilton Head Island, SC 29928

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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SC Court of Appeals

Dear Ms. White and Mr. DuBois:

Enclosed for service on you in the above-referenced matter, please find a copy of the following documents, which were electronically filed with the Court on October 12, 2026 on behalf of Respondent John R. C. Bowen:

- 1) Final Brief of Respondent John R. C. Bowen
- 2) Certification for Final Brief of Respondent John R. C. Bowen
- 3) Motion for Leave to File Supplemental Record on Appeal
- 4) Supplemental Record on Appeal

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Aimee M. Justman
Legal Assistant

/amj
Enclosures