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MAY 22 2013

S.C. Supreme Court

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge.

Appeal 2011 199886

Consolidated Case Nos. 2009-CP-10-6694

John Doe, Jane Doe, Jane Doe 2, and Jane Doe 3.....Appellants,

v.

The Bishop of Charleston, A Corporation Sole,
and the Bishop of the Diocese of Charleston in
His Official Capacity.....Respondents.

RESPONDENTS', THE DIOCESE OF CHARLESTON, A CORPORATION SOLE, AND THE
BISHOP OF CHARLESTON, IN HIS OFFICIAL CAPACITY,
PETITION TO SUPPLEMENT RECORD ON APPEAL

A. Peter Shahid, Jr
Shahid Law Office, LLC
89 Broad Street
Charleston, South Carolina 29401
(843)-853-4500
Attorney for Respondents, Diocese of
Charleston and the Bishop of Charleston, A
Corporation Sole

The Bishop of Charleston, A Corporation Sole, and the Bishop of the Diocese of Charleston in His Official Capacity, Respondents above, petition this Court for leave to supplement the Record on Appeal in the above-captioned appeal pursuant to South Carolina Rules of Appellate Court, 212(b).

The basis of this Petition is to clarify for the Court inquiries made by the Justices during oral argument on April 4, 2013, to the Attorney for the Respondents regarding the status of the underlying Class Action Settlement Agreement filed in the Court of Common Pleas, Dorchester County, and the responses the Attorney for the Respondents provided to the Justices to those inquiries.

Specifically, the Court questioned the Respondent as to the status of the Dorchester County action following the Order of this Court dated March 19, 2009, (R.76-77) in which the Court ordered: "Accordingly we hereby direct that the underlying matter be concluded within six months of the date of this Order. No extension shall be granted without prior permission by this Court."

The panel questioned the Respondents' attorney whether an accounting had been filed with the Dorchester County Court of the monies received from the Respondents to the Class Action escrow agent fund pursuant to the Class Action Settlement, and whether a final order had been filed in compliance with this Court's above stated Order. The Court was misinformed by counsel who stated that no such accounting had been filed. A final accounting was indeed provided to the Court. Further a proposed Final Order in compliance with the Court's directive was sent to the Circuit Court judge.

The Respondents wish to supplement the record in order to correct those answers provided by the Appellants' attorney. These documents include the following:

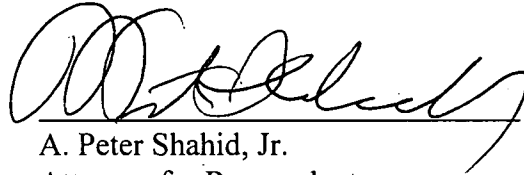
1. Letter dated March 10, 2008, addressed to The Honorable Diane S. Goodstein, from the Richter Firm enclosing a copy of the final accounting of disbursements submitted by W. Ellis Thompson, CPA (SR¹ 1-6);
2. Letter dated March 3, 2009, from the undersigned, addressed to Class Counsel, Lawrence E. Richter, Jr. enclosing a proposed consent order of dismissal (SR¹⁷ 9);
3. Letter dated March 27, 2009, addressed to the undersigned from Mr. Richter, enclosing the executed Consent Order of Dismissal with Prejudice (SR 10-12);
4. Letter addressed to Mr. Richter, dated April 2, 2009, from the undersigned, enclosing a revised executed Consent Order of Dismissal with Prejudice (SR 13-15);
5. Letter addressed to The Honorable Diane S. Goodstein, dated April 15, 2009, forwarding the original Consent Order of Dismissal with Prejudice, executed by Mr. Richter and the undersigned (SR16-18).

Rule 212 (b) SCRA, provides in part: " Without such consent or after argument commences, a party desiring to supplement the Record on Appeal must move the appellate court for leave to do so. " The Appellants have been provided with a copy of this Petition with the attached documents and they have communicated to the undersigned they do not oppose the record to be supplemented as requested. Thus, the Respondents seek to supplement the Record

¹SR = Supplemental Record

on Appeal with the above documents to make a more complete record to aid the Court in the issuance of its opinion on the matter before it.

Respectfully Submitted,

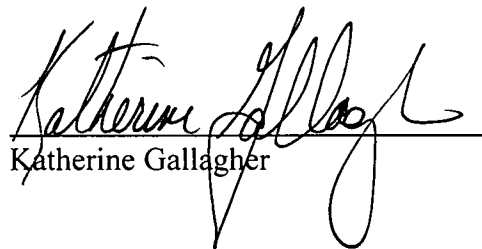


A. Peter Shahid, Jr.
Attorney for Respondents
89 Broad Street
Charleston, SC 29401
843/853-4500
SC Bar # 5030

Charleston, SC
May 20, 2013

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail this 20th day of May 2013 to: **Gregg Meyers, Esquire**, 366 Jackson St., St. Paul, MN 55101.



Katherine Gallagher

THE RICHTER FIRM, LLC
 ATTORNEYS AND COUNSELORS AT LAW
 622 JOHNNIE DODDS BOULEVARD
 POST OFFICE DRAWER 1089
 MT. PLEASANT, SOUTH CAROLINA 29465

LAWRENCE E. RICHTER, JR.
 ALICE ANNE RICHTER
 WILLIAM H. WARING, III
 HARPER L. TODD*

TELEPHONE (843) 849-6000

FACSIMILE (843) 881-1400

* (Admitted only in GA)

March 10, 2008

VIA U.S. MAIL

The Honorable Diane S. Goodstein
 Post Office Box 234
 St. George, SC 29477

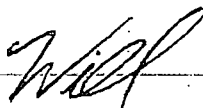
Re: *Doe, et al. v. The Bishop of Charleston, et al.*
 2006-CP-18-1310
 2006-CP-18-1311
 2006-CP-18-1636

Dear Judge Goodstein:

Pursuant to paragraph 6(A) of the Settlement and Arbitration Agreement executed January 12, 2007, and approved by your Order dated July 30, 2007, I have attached a copy of the final accounting of disbursements submitted by W. Ellison Thomas, CPA. Pursuant to the same, Mr. Thomas has submitted these documents to class counsel, counsel for the Diocese, and to the arbitrator, Marvin D. Infinger.

Thank you very much for your consideration. As always, I remain

Very truly yours,



William H. Waring, III

Enclosure

cc: Albert P. Shahid, Jr., Esquire [via facsimile - 722-1119]
 Marvin D. Infinger, Esquire [via facsimile - 722-2266]
 David K. Haller, Esquire [via facsimile - 577-7288]
 W. Ellison Thomas, CPA [via facsimile - 881-9008]

000001

**JOHN DOE CLASS ACTION SETTLEMENT ACCOUNT
SETTLEMENT & ARBITRATION AGREEMENT
DATED JANUARY 12, 2007**

March 7, 2008

<u>Category</u>	<u>Date</u>	<u>Check #</u>	<u>Amount</u>	<u>Description</u>
Class Counsel - Fees				
Richter & Haller, LLC	9/4/2007	Wire	\$ 2,500,000.00	Court Order
Class Counsel - Expenses				
Richter & Haller, LLC	9/4/2007	Wire	\$ 100,991.36	Court Order
The Richter Firm, LLC	1/8/2008	1002	\$ 8,245.15	Partial - Control No. 6
The Richter Firm, LLC	2/10/2008	1009	\$ 835.70	Control No. 5
The Richter Firm, LLC	2/10/2008	1010	\$ 2,052.71	Partial - Control No. 6
The Richter Firm, LLC	2/27/2008	1144	\$ 596.20	Control No. 47
Arbitrator				
Marvin Infinger, Esq.	2/27/2008	1139	\$ 29,541.69	Control No. 40
Marvin Infinger, Esq.	3/7/2008	1153	\$ 2,450.00	Control No. 51
Counseling				
Dr. L. Randolph Waid	1/24/2008	1005	\$ 10,425.00	8 - 12, 14 - 19, 21 - 23
Dr. L. Randolph Waid	2/10/2008	1012	\$ 5,250.00	Control No.s 24 - 30
Dr. L. Randolph Waid	2/20/2008	1135	\$ 1,875.00	Control No.s 32,33,34
Dr. L. Randolph Waid	2/27/2008	1137	\$ 1,875.00	Control Nos. 35 -38
Escrow Agent				
W. Ellison Thomas, CPA	1/8/2008	1003	\$ 2,635.00	Partial - Control No. 7
W. Ellison Thomas, CPA	1/8/2008	1004	\$ 5,657.50	Control No. 20
W. Ellison Thomas, CPA	2/10/2008	1011	\$ 2,555.22	Partial - Control No. 7
W. Ellison Thomas, CPA	2/10/2008	1013	\$ 2,247.50	Control No. 31
W. Ellison Thomas, CPA	3/7/2008	1154	\$ 8,544.44	Control No. 52
Other				
Desa Ballard, Esq.	11/27/2007	1001	\$ 2,968.93	Control No. 1
Bank Fees	1/31/2008		\$ 10.00	Wire Fee
Process Service, Inc.	2/10/2008	1006	\$ 75.00	Control No. 2
Conferencecall.com	2/10/2008	1007	\$ 35.66	Control No. 3
Palmetto Investigative, Inc.	2/10/2008	1008	\$ 1,549.00	Control No. 4
Conferencecall.com	2/27/2008	1138	\$ 14.42	Control No. 39
Clark & Associates, Inc.	2/27/2008	1140	\$ 3,228.50	Control No. 43
Process Service, Inc.	2/27/2008	1141	\$ 170.00	Control No. 44
Dr. John Roberts, MD	2/27/2007	1142	\$ 85.00	Control No. 45
Dr. Sally M. duffy Ph.D.	2/27/2008	1143	\$ 400.00	Control No. 46
Dr. Cathy Mintzer	2/27/2008	1145	\$ 500.00	Control No. 48
David K. Halfer, Esq.	2/27/2008	1146	\$ 225.58	Control No. 49
Judy Kramer	3/6/2008	1147	\$ 63.20	Control No. 50
Total Non Claimant			\$ 2,695,100.76	

**JOHN DOE CLASS ACTION SETTLEMENT ACCOUNT
 SETTLEMENT & ARBITRATION AGREEMENT
 DATED JANUARY 12, 2007**

March 7, 2008

<u>Claimant</u>	<u>Date</u>	<u>Check #</u>	<u>Amount</u>	<u>Description</u>
John Doe 53	*	*	\$ 160,000.00	Settlement Agreement
John Doe 66	*	*	\$ 100,000.00	Settlement Agreement
John Doe 66A	*	*	\$ 100,000.00	Settlement Agreement
John Doe 67	*	*	\$ 100,000.00	Settlement Agreement
Jane Doe A	10/23/2007	1	\$ 30,000.00	Settlement Agreement
Jane Doe B	10/23/2007	2	\$ 30,000.00	Settlement Agreement
Rachel Roe	10/23/2007	3	\$ 30,000.00	Settlement Agreement
The Richter Firm, LLC for DOE 501	2/15/2008	1014	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 548	2/15/2008	1015	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 502	2/15/2008	1016	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 540	2/15/2008	1017	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 541	2/15/2008	1018	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 503	2/15/2008	1019	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 504	2/15/2008	1020	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 505	2/15/2008	1021	\$ 10,000.00	Arbitration Order
The Richter Firm, LLC for DOE 506	2/15/2008	1022	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 507	2/15/2008	1023	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 551	2/15/2008	1024	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 556	2/15/2008	1025	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 508	2/15/2008	1026	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 554	2/15/2008	1027	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 555	2/15/2008	1028	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 509	2/15/2008	1029	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 510	2/15/2008	1030	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 511	2/15/2008	1031	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 512	2/15/2008	1032	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 513	2/15/2008	1033	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 550	2/15/2008	1034	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 549	2/15/2008	1035	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 537	2/15/2008	1036	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 533	2/15/2008	1037	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 532	2/15/2008	1038	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 538	2/15/2008	1039	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 552	2/15/2008	1040	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 531	2/15/2008	1041	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 543	2/15/2008	1042	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 544	2/15/2008	1043	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 545	2/15/2008	1044	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 514	2/15/2008	1045	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 515	2/15/2008	1046	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 534	2/15/2008	1047	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 539	2/15/2008	1048	\$ 20,000.00	Arbitration Order

* Escrow Agent did not pay these amounts. Paid by Diocese prior to Escrow Agent receiving funds.

**JOHN DOE CLASS ACTION SETTLEMENT ACCOUNT
SETTLEMENT & ARBITRATION AGREEMENT
DATED JANUARY 12, 2007**

March 7, 2008

<u>Claimant</u>	<u>Date</u>	<u>Check #</u>	<u>Amount</u>	<u>Description</u>
The Richter Firm, LLC for DOE 516	2/15/2008	1049	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 517	2/15/2008	1050	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 518	2/15/2008	1051	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 519	2/15/2008	1052	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 547	2/15/2008	1053	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 520	2/15/2008	1054	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 521	2/15/2008	1055	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 522	2/15/2008	1056	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 523	2/15/2008	1057	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 524	2/15/2008	1058	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 525	2/15/2008	1059	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 548	2/15/2008	1060	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 535	2/15/2008	1061	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 536	2/15/2008	1062	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 526	2/15/2008	1063	\$ 10,000.00	Arbitration Order
The Richter Firm, LLC for DOE 527	2/15/2008	1064	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 553	2/15/2008	1065	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 528	2/15/2008	1066	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 529	2/15/2008	1067	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 542	2/15/2008	1068	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 530	2/15/2008	1069	\$ 20,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 602	2/15/2008	1070	\$ 20,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 605	2/15/2008	1071	\$ 20,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 606	2/15/2008	1072	\$ 20,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 608	2/15/2008	1073	\$ 20,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 609	2/15/2008	1074	\$ 20,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 610	2/15/2008	1075	\$ 20,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 621	2/15/2008	1076	\$ 20,000.00	Arbitration Order
Walter S. Ameika for DOE 614	2/15/2008	1077	\$ 20,000.00	Arbitration Order
Barr, Unger & McIntosh, LLC for DOE 623	2/15/2008	1078	\$ 20,000.00	Arbitration Order
Arthur E. White, Jr. for DOE 618	2/15/2008	1079	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 540	2/15/2008	1080	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 541	2/15/2008	1081	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 509	2/15/2008	1082	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 101	2/15/2008	1083	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 102	2/15/2008	1084	\$ 55,000.00	Arbitration Order
The Richter Firm, LLC for DOE 202	2/15/2008	1085	\$ 40,000.00	Arbitration Order
The Richter Firm, LLC for DOE 203	2/15/2008	1086	\$ 100,000.00	Arbitration Order
The Richter Firm, LLC for DOE 301	2/15/2008	1087	\$ 125,000.00	Arbitration Order
The Richter Firm, LLC for DOE 302	2/15/2008	1088	\$ 100,000.00	Arbitration Order
The Richter Firm, LLC for DOE 303	2/15/2008	1089	\$ 100,000.00	Arbitration Order
The Richter Firm, LLC for DOE 308	2/15/2008	1090	\$ 40,000.00	Arbitration Order
The Richter Firm, LLC for DOE 304	2/15/2008	1091	\$ 60,000.00	Arbitration Order

**JOHN DOE CLASS ACTION SETTLEMENT ACCOUNT
SETTLEMENT & ARBITRATION AGREEMENT
DATED JANUARY 12, 2007**

March 7, 2008

<u>Claimant</u>	<u>Date</u>	<u>Check #</u>	<u>Amount</u>	<u>Description</u>
The Richter Firm, LLC for DOE 305	2/15/2008	1092	\$ 200,000.00	Arbitration Order
The Richter Firm, LLC for DOE 307	2/15/2008	1093	\$ 60,000.00	Arbitration Order
The Richter Firm, LLC for DOE 306	2/15/2008	1094	\$ 55,000.00	Arbitration Order
The Richter Firm, LLC for DOE 401	2/15/2008	1095	\$ 150,000.00	Arbitration Order
The Richter Firm, LLC for DOE 402	2/15/2008	1096	\$ 175,000.00	Arbitration Order
The Richter Firm, LLC for DOE 403	2/15/2008	1097	\$ 175,000.00	Arbitration Order
The Richter Firm, LLC for DOE 404	2/15/2008	1098	\$ 125,000.00	Arbitration Order
The Richter Firm, LLC for DOE 405	2/15/2008	1099	\$ 150,000.00	Arbitration Order
The Richter Firm, LLC for DOE 406	2/15/2008	1100	\$ 200,000.00	Arbitration Order
The Richter Firm, LLC for DOE 407	2/15/2008	1101	\$ 75,000.00	Arbitration Order
The Richter Firm, LLC for DOE 408	2/15/2008	1102	\$ 175,000.00	Arbitration Order
The Richter Firm, LLC for DOE 409	2/15/2008	1103	\$ 175,000.00	Arbitration Order
The Richter Firm, LLC for DOE 410	2/15/2008	1104	\$ 200,000.00	Arbitration Order
The Richter Firm, LLC for DOE 408	2/15/2008	1105	\$ 100,000.00	Arbitration Order
The Richter Firm, LLC for DOE 411	2/15/2008	1106	\$ 75,000.00	Arbitration Order
The Richter Firm, LLC for DOE 420	2/15/2008	1107	\$ 70,000.00	Arbitration Order
The Richter Firm, LLC for DOE 412	2/15/2008	1108	\$ 100,000.00	Arbitration Order
The Richter Firm, LLC for DOE 414	2/15/2008	1109	\$ 150,000.00	Arbitration Order
The Richter Firm, LLC for DOE 415	2/15/2008	1110	\$ 100,000.00	Arbitration Order
The Richter Firm, LLC for DOE 416	2/15/2008	1111	\$ 125,000.00	Arbitration Order
The Richter Firm, LLC for DOE 616	2/15/2008	1112	\$ 125,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 603	2/15/2008	1113	\$ 150,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 604	2/15/2008	1114	\$ 150,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 607	2/15/2008	1115	\$ 200,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 611	2/15/2008	1116	\$ 150,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 612	2/15/2008	1117	\$ 150,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 613	2/15/2008	1118	\$ 150,000.00	Arbitration Order
McGowan, Hood, Felder & Johnson, LLC for DOE 620	2/15/2008	1119	\$ 70,000.00	Arbitration Order
Barr, Unger & McIntosh, LLC for DOE 615	2/15/2008	1120	\$ 200,000.00	Arbitration Order
Pro Se - Doe 601	2/15/2008	1121	\$ 200,000.00	Arbitration Order
Pro Se - Doe 619	2/15/2008	1128	\$ 315.00	Control No. 43
Pro Se - Doe 619	2/15/2008	1129	\$ 59,685.00	Arbitration Order
Pro Se - Doe 622	2/15/2008	1123	\$ 20,000.00	Arbitration Order
Pro Se - Doe 624	2/15/2008	1124	\$ 20,000.00	Arbitration Order
Pro Se - Doe 625	2/15/2008	1125	\$ 20,000.00	Arbitration Order
Pro Se - Doe 627	2/15/2008	1130	\$ 195.00	Control No. 42
Pro Se - Doe 627	2/15/2008	1131	\$ 149,805.00	Arbitration Order
The Richter Firm, LLC for DOE 628	2/20/2008	1134	\$ 20,000.00	Arbitration Order
The Richter Firm, LLC for DOE 413	2/27/2008	1136	\$ 175,000.00	Arbitration Order
The Richter Firm, LLC for DOE 418	3/6/2008	1151	\$ 40,193.87	Arbitration Order
David K. Haller, Esq. Escrow for DOE 418	3/6/2008	1152	\$ 159,806.13	Arbitration Order

The Bank of South Carolina

515 00001 03
ACCOUNT:

PAGE: 1
190030860 03/31/2008

P.O. BOX 538
CHARLESTON, SC 29402
(843) 724-1500
www.banksc.com



W ELLISON THOMAS, CPA
ESCROW AGENT FOR JOHN DOE
CLASS ACTION SETTLEMENT ACCT
109A SIMMONS STREET
MT PLEASANT SC 29464

30
1
21

~IMPORTANT INFORMATION REGARDING YOUR VISA CHECKCARD~
VISA has announced changes to their fee structure regarding International Assessment Fees (ISA), posting directly to cardholders' accounts, effective April 2008. Fees are as follows:
1% for transactions requiring a currency conversion
.8% for international merchants that settle in US dollars
.8% for international transactions clearing through the MasterCard Network

NON-PERSONAL NOW ACCOUNT 190030860

INTEREST THIS STATEMENT	3,686.86	LAST STATEMENT 02/29/08	2,405,892.93
INTEREST PAID 2008	18,629.87	2 CREDITS	323,349.75
MINIMUM BALANCE	1,933,936.79	21 DEBITS	791,619.03
AVG AVAILABLE BALANCE	2,229,013.73	THIS STATEMENT 03/31/08	1,937,623.65
AVERAGE BALANCE	2,239,325.44		

----- DEPOSITS -----
REF #.....DATE.....AMOUNT REF #.....DATE.....AMOUNT REF #.....DATE.....AMOUNT
03/13 319,662.89

----- OTHER CREDITS -----
DESCRIPTION DATE AMOUNT
INTEREST 03/31 3,686.86

CHECKS		
CHECK #..DATE.....AMOUNT	CHECK #..DATE.....AMOUNT	CHECK #..DATE.....AMOUNT
1121*03/31 200,000.00	1141 03/05 170.00	1149 03/10 40,143.24
1123*03/25 20,000.00	1142 03/03 85.00	1150 03/12 159,856.76
1135*03/04 1,875.00	1143 03/11 400.00	1151 03/10 40,193.87
1137 03/04 1,875.00	1144*03/05 596.20	1152*03/12 159,806.13
1138 03/03 14.42	1146 03/05 225.58	1154 03/18 8,544.44
1139 03/04 29,541.69	1147 03/12 63.20	1155 03/21 85,000.00
1140 03/04 3,228.50	1148 03/12 20,000.00	1156-03/21 20,000.00

(*) INDICATES A GAP IN CHECK NUMBER SEQUENCE

OK \$ 1,937,623.65
REF # 15 <500.00>
53 <2,450.00>
57 <1,716,323.90>
58 <139,856.76>
59 <74,806.13>



000006

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

OK \$ 3,686.86

SHAHID LAW OFFICE, LLC
89 BROAD STREET
CHARLESTON, SOUTH CAROLINA 29401

A. PETER SHAHID, JR.
ERIN G. GROEBER

OFFICE: (843) 853-4500
FAX: (843) 722-1119
SHAHIDLO@BELLSOUTH.NET

March 3, 2009

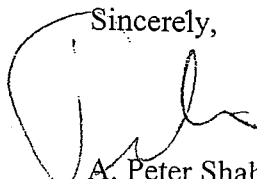
Lawrence E. Richter, Jr.
Attorney at Law
622 Johnnie Dodds Boulevard
Mount Pleasant, SC 29465

COPY

Dear Larry:

Please find enclosed a revised Consent Order of Dismissal with Prejudice. If this Order meets with your approval, please advise.

Sincerely,



A. Peter Shahid, Jr.

APS/mjm

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STATE OF SOUTH CAROLINA)
)
COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO. 06-CP-18-1310
CASE NO. 06-CP-18-1311
CASE NO. 06-CP-18-1636

JOHN DOE #53, JOHN DOE #66,)
JOHN DOE #66A, JOHN DOE #67,)
JANE DOE #1 JANE DOE #2,)
AND RACHEL ROE, individually,)
and as representative of a class)
of people similarly situated,)
)
Plaintiff,)

vs.)

CONSENT ORDER OF
DISMISSAL WITH PREJUDICE

THE BISHOP OF CHARLESTON,)
A CORPORATION SOLE, AND)
THE BISHOP OF THE DIOCESE OF)
CHARLESTON, IN HIS OFFICIAL)
CAPACITY,)
)
Defendants.)

WHEREAS, the parties, by and through their undersigned counsel have notified the Court that all respective duties, obligations, and responsibilities pursuant to the Settlement and Arbitration Agreement (“Agreement”) executed by the parties on January 12, 2007, and approved by subsequent Orders of the Court dated July 30, 2007, August 31, 2007, February 3, 2009 and February 12, 2009 (“Orders”), have been fulfilled and completed; and

WHEREAS, the parties, by and through their undersigned counsel, having fulfilled and completed all respective duties, obligations, and responsibilities pursuant to said Agreement and Orders, hereby agree to the dismissal WITH PREJUDICE of all alleged cases of action in the above-referenced matters, pursuant to Rule 41(a)(1)(B), SCRCP.

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

That pursuant to Rule 41(a)(1)(B), SCRPC, all alleged causes of action in the above-referenced matters are DISMISSED, WITH PREJUDICE.

AND IT IS SO ORDERED!

The Honorable Diane S. Goodstein
Presiding Judge

This ____ day of _____, 2009
_____, South Carolina

WE CONSENT:

RICHTER & HALLER, LLC

By: _____
Lawrence E. Richter, Jr.
David K. Haller
Post Office Drawer 1089
Mt. Pleasant, SC 29465
(843) 849-6000

PLAINTIFFS' CLASS COUNSEL

WE CONSENT:

SHAHID LAW OFFICE, LLC

By: _____
A. Peter Shahid, Jr.
89 Broad Street
Charleston, SC 29401
(843) 853-4500

ATTORNEY FOR DEFENDANTS

000009

THE RICHTER FIRM, LLC

Attorneys & Counselors at Law
622 Johnnie Dodds Boulevard
Post Office Drawer 1089
Mount Pleasant, South Carolina 29465

Lawrence E. Richter, Jr.
William Bee Ravenel Lewis
Alice Anne Richter Lehrman
Aaron E. Edwards

Telephone: (843) 849-6000
Telefax: (843) 881-1400

March 27, 2009

**VIA FACSIMILE 722-1119
AND U.S. MAIL**

A. Peter Shahid, Jr., Esq.
Shahid Law Office, LLC
89 Broad Street
Charleston, SC 29401

Dear Peter:

I had sent you an order of dismissal last March but never received it back from you executed. I don't know where that is, but as a matter of safety I am signing the dismissal that you have prepared and I return it to you herewith.

Very truly yours,

Lawrence E. Richter, Jr.

Lawrence E. Richter, Jr.
Dictated but not read

LER/(wh)
Enclosure

cc: David K. Haller, Esq. (via facsimile 577-7288)

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STATE OF SOUTH CAROLINA)
COUNTY OF DORCHESTER)
JOHN DOE #53, JOHN DOE #66,)
JOHN DOE #66A, JOHN DOE #67,)
JANE DOE #1 JANE DOE #2,)
AND RACHEL ROE, individually,)
and as representative of a class)
of people similarly situated,)
Plaintiff,)
vs.)
THE BISHOP OF CHARLESTON,)
A CORPORATION SOLE, AND)
THE BISHOP OF THE DIOCESE OF)
CHARLESTON, IN HIS OFFICIAL)
CAPACITY,)
Defendants.)

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO. 06-CP-18-1310
CASE NO. 06-CP-18-1311
CASE NO. 06-CP-18-1636

CONSENT ORDER OF
DISMISSAL WITH PREJUDICE

WHEREAS, the parties, by and through their undersigned counsel have notified the Court that all respective duties, obligations, and responsibilities pursuant to the Settlement and Arbitration Agreement (“Agreement”) executed by the parties on January 12, 2007, and approved by subsequent Order of the Court dated July 30, 2007 have been fulfilled and completed. Furthermore, all respective duties, obligations, and responsibilities pursuant to subsequent orders issued by the Court regarding matters pending in this case dated August 31, 2007, February 3, 2009 and February 12, 2009 (“Orders”), have been fulfilled and completed; and

WHEREAS, the parties, by and through their undersigned counsel, having fulfilled and completed all respective duties, obligations, and responsibilities pursuant to said Agreement and Orders, hereby agree to the dismissal WITH PREJUDICE all alleged causes of action in the

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above-referenced matters, pursuant to Rule 41(a)(1)(B), SCRCPC; and

WHEREAS this Court has resolved all pending matters with the exception of whether legal interest is due from the Defendants on the \$1,375,000.00 paid to those claimants represented by Gregg Meyers pursuant to the August 31, 2007 Order and whether sanctions will be ordered against Gregg Meyers, issues which are to be ruled on no later than six (6) months from the Supreme Court's Order dated March 19, 2009;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

That pursuant to Rule 41(a)(1)(B), SCRCPC, all alleged causes of action in the above-referenced matters are DISMISSED, WITH PREJUDICE.

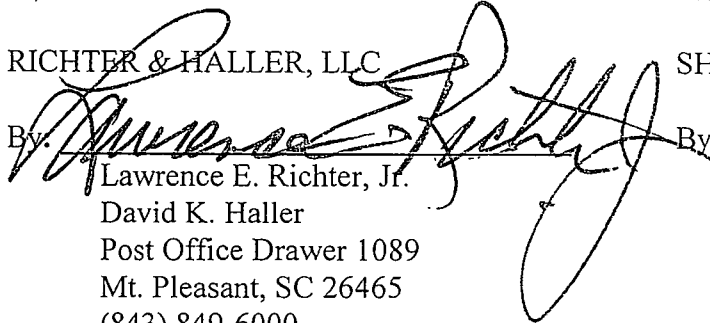
AND IT IS SO ORDERED!

The Honorable Diane S. Goodstein
Presiding Judge

This ____ day of _____, 2009
_____, South Carolina

WE CONSENT:

RICHTER & HALLER, LLC

By: 
Lawrence E. Richter, Jr.
David K. Haller
Post Office Drawer 1089
Mt. Pleasant, SC 26465
(843) 849-6000

PLAINTIFFS' CLASS COUNSEL

WE CONSENT:

SHAHID LAW OFFICE, LLC

By: _____
A. Peter Shahid, Jr.
89 Broad Street
Charleston, SC 29401
(843) 853-4500

ATTORNEY FOR DEFENDANTS

000012

SHAHID LAW OFFICE, LLC
89 BROAD STREET
CHARLESTON, SOUTH CAROLINA 29401

A. PETER SHAHID, JR.
ERIN G. GROEBER

OFFICE: (843) 853-4500
FAX: (843) 722-1119
SHAHIDLO@BELLSOUTH.NET

April 2, 2009

via facsimile: 881-1400 and Regular U.S. Mail
Mr. Lawrence E. Richter, Jr., Esq.
The Richter Firm
622 Johnnie Dodds Blvd.
Mt. Pleasant, SC 29465

COPY

RE: John Doe #53 et al vs. The Diocese of Charleston
Class Action Settlement

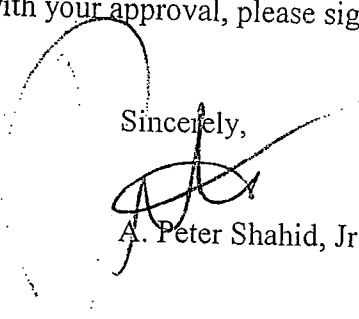
Dear Larry:

I am in receipt of your letter of March 27, 2009 including executed Consent Order of Dismissal with Prejudice. I previously forwarded to you two versions of the Consent Order of Dismissal which you circulated last year but was never filed due to Gregg Meyers' Charleston County civil action, on March 3, 2009, and on March 20, 2009. These drafts were modified to reflect Judge Goodstein's orders of February, 2009 and the Supreme Court order of March 19, 2009.

Judge Goodstein ruled on the final issues of judgment interest owed to Mr. Meyers and sanctions against Mr. Meyers in her Order of March 23, 2009. It is my understanding these were the last two outstanding issues in the Class Action matter. Now that all issues are resolved in Dorchester County, I believe it would be best for us to execute an order reflecting the finality of the Class Action Case. Please find enclosed a proposed Consent Order of Dismissal with Prejudice which reflects Judge Goodstein's orders of July 30, 2007, August 31, 2007, February 3, 2009, February 12, 2009 and March 23, 2009.

If this order meets with your approval, please sign and return the original to me for filing with Judge Goodstein.

Sincerely,


A. Peter Shahid, Jr.

Enclosure

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above-referenced matters, pursuant to Rule 41(a)(1)(B), SCRPC;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

That pursuant to Rule 41(a)(1)(B), SCRPC, all alleged causes of action in the above-referenced matters are DISMISSED, WITH PREJUDICE.

AND IT IS SO ORDERED!

The Honorable Diane S. Goodstein
Presiding Judge

This ____ day of _____, 2009
_____, South Carolina

WE CONSENT:


RICHTER & HALLER, LLC

By: _____
Lawrence E. Richter, Jr.
David K. Haller
Post Office Drawer 1089
Mt. Pleasant, SC 26465
(843) 849-6000

PLAINTIFFS' CLASS COUNSEL

WE CONSENT:

SHAHID LAW OFFICE, LLC

By:  _____
A. Peter Shahid, Jr.
89 Broad Street
Charleston, SC 29401
(843) 853-4500

ATTORNEY FOR DEFENDANTS

000015

SHAHID LAW OFFICE, LLC

A. PETER SHAHID, JR.
89 BROAD STREET
CHARLESTON, SOUTH CAROLINA 29401

OFFICE: (843) 853-4500
FAX: (843) 722-1119
SHAHIDLO@BELLSOUTH.NET

April 15, 2009

The Honorable Diane S. Goodstein
First Judicial Circuit
101 Ridge Street
St. George, SC 29477


RE: John Doe #53 et al v. The Diocese of Charleston
Case No.: 06-CP-18-1310, 1311 & 1636

Dear Judge Goodstein:

Please find enclosed a Consent Order of Dismissal with Prejudice executed by Mr. Richter and myself in regard to the above captioned matter. If this Order meets with your approval I would appreciate your signing and forwarding it the Clerk's office to be filed. I am also enclosing five copies and a self-addressed stamped envelope.

Thank you for your kind attention to this matter.

Sincerely,



A. Peter Shahid, Jr.
General Counsel

Enclosure: as stated above

cc: Mr. Lawrence E. Richter, Jr., Esq.

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above-referenced matters, pursuant to Rule 41(a)(1)(B), SCRCP;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

That pursuant to Rule 41(a)(1)(B), SCRCP, all alleged causes of action in the above-referenced matters are DISMISSED, WITH PREJUDICE.

AND IT IS SO ORDERED!

The Honorable Diane S. Goodstein
Presiding Judge

This ____ day of _____, 2009

_____, South Carolina

WE CONSENT:

RICHTER & HALLER, LLC

By: 

Lawrence E. Richter, Jr.
David K. Haller
Post Office Drawer 1089
Mt. Pleasant, SC 26465
(843) 849-6000

PLAINTIFFS' CLASS COUNSEL

WE CONSENT:

SHAHID LAW OFFICE, LLC

By: 

A. Peter Shahid, Jr.
89 Broad Street
Charleston, SC 29401
(843) 853-4500

ATTORNEY FOR DEFENDANTS

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