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Apr 03 2024

SC Court of Appeals

The State of South Carolina
In The Court of Appeals

Appeal from Dorchester County
Hon. Heath P. Taylor, Circuit Court Judge

Appellate Case 2023-000720

Case Nos. 2006-CP-18-01310
2006-CP-18-01311
2006-CP-18-01636

John Doe #53, John Doe 66, John Doe 66A, John Doe 67,
Jane Doe 1 and Jane Doe 2 and Rachel Roe, individually
and as representatives of a class of people similarly situated,
Plaintiffs,

Of whom class members Julie McDonald and
Richard McDonald are the

Appellants,

v.

The Bishop of Charleston a Corporation sole, and the Bishop of
The Diocese of Charleston, in his official capacity,

Respondents,

And

David K. Haller, Lawrence E. Richter, Jr., and Richter
& Haller, LLC,

Intervenors.

Supplemental Proof of Service

Appellants originally served the

Record on Appeal

for this appeal on March 14, 2024, by causing a copy of each volume of the Record to be sent electronically, via email, to counsel and to Mr. Sires (a party to the case although not to the appeal) addressed to the following email addresses:

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As the four volumes of the Record on Appeal exceed the size limits permitted by counsel's email provider, that March 14 method of electronic delivery used as an intermediary a website called wetransfer.com, a file-transfer site which enables large files to be electronically transferred. That site provided notice, by email, to each counsel, that the files had been uploaded, were available through a link provided by email, and could be downloaded from wetransfer.com.

The file transfer site is similar to the court's use of OneDrive to enable counsel to upload large files electronically to the court.

Wetransfer.com provides an electronic record for each file uploaded and downloaded.

Alone among counsel, Mr. Bruner chose not to download the Record on Appeal as made available to him through wetransfer.com. Instead, Mr. Bruner responded to the notice of delivery via wetransfer.com by requesting, via email sent to counsel for the appellant, that the four volumes of the Record on Appeal be transferred to him electronically by separate electronic means, using his firm's system for uploading large files. Which counsel for the appellant did promptly upon seeing the Mr. Bruner's request.

Mr. Bruner has received the Record on Appeal, including the corrected Volume 3. Since receiving the Record, Mr. Bruner has communicated with counsel about two errors in the Index to the Record, one in the index for Volume Three and one in the Index for volume Four. Not that the pages in the Record are incorrect, but that the Index listing for pages 1188 (in Volume Three) and 1341 (in Volume Four) are each mistaken. As to page 1188, the author of the letter at that page was incorrectly identified. As to page 1341 the description contained incorrect date.

Each correction has been made to the respective Index, and the Record volumes re-sent.

Despite his actual receipt of the Record on Appeal, by the method he requested be used for that service, that there was no proper "service" of the Record. Mr. Bruner "reserves the right" to file a motion to challenge service.

To satisfy Mr. Bruner's unusual perspective, counsel for appellants has provided supplemental service of the

Record on Appeal

by sending to each of the above listed counsel (excluding Mr. Sires), four separate emails, one email for each of the four volumes of the Record on Appeal, with a corrected Index listing as to each of pages 1188 and 1341.

Done April 3, 2024.

Respectfully submitted,

s/ Gregg Meyers

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