

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge
Case No. 2022-CP-26-06296

Appellate Case No. 2024-000786

RECEIVED

MAY 13 2025

SC Court of Appeals

Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall Respondents,

v.

William Bertram von Herrmann and The von Herrmann Law Firm. Appellants.

RESPONDENTS' DESIGNATION OF MATTER

Pursuant to Rule 209, SCACR, Respondents Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall propose the following to be included in the Record on Appeal:

Orders

1. Order Granting in Part and Denying in Part Defendants' Motion to Dismiss, filed November 1, 2023;
2. Form 4 Order granting Plaintiff Anna Coggeshall's Motion/Compel Discovery, filed March 20, 2024;
3. Order Denying the Motion to Reconsider, filed April 17, 2024;

Pleadings, Motions, and Other Court Filings

4. Summons and Complaint, filed October 7, 2022;
5. Amended Summons and Complaint, filed November 17, 2022;
6. Defendants' Motion to Dismiss, filed November 17, 2022;

7. Plaintiffs' Response to Defendants' Motion to Dismiss, filed December 1, 2022;
8. Defendants' Reply to Plaintiffs' Memorandum in Opposition to Motion to Dismiss, filed December 7, 2022;
9. Plaintiffs' Reply to Defendants' Motion to Dismiss, filed May 7, 2023;
Exhibits to Plaintiffs' Reply, filed May 7, 2023:
 10. Exhibit 1: Email from Richard Whiting to Bert von Herrmann, dated April 7, 2022;
 11. Exhibit 2: Email from Bert von Herrmann, dated April 7, 2022, concerning Mr. Fulmer's Supplemental Production;
 12. Exhibit 3: Letter from William von Herrmann to Opposing Counsel, dated April 7, 2022, with attached photograph, chat with Apple Support, and photographs of text messages intercepted from Anna's iWatch;
13. Plaintiffs' Notice of Motion and Motion to Compel Discovery, filed August 1, 2023;
14. Plaintiffs' First Set of Interrogatories and Discovery Requests, filed August 1, 2023;
15. Defendants' Motion for Reconsideration of Order denying in part Motion to Dismiss, filed November 10, 2023;
16. Plaintiffs' Reply to Defendants' Motion for Reconsideration of Order denying in part Motion to Dismiss, filed November 16, 2023;

Exhibits to Plaintiffs' Reply, filed November 16, 2023:

17. Affidavit of Melissa J. Buckhannon, dated October 11, 2023;
18. Exhibit 1: Ms. Heather S. von Herrmann, Family Court Qualifications;
19. Exhibit 2: Order of South Carolina Court of Appeals in *Justin Shayne Fulmer v. Melissa Emery Buchannon Esq., et al.*, Appellate Case No. 2022-000330, filed September 2, 2022;
20. Exhibit 3: Complaint in *Justin Shayne Fulmer v. Melissa Emery Buchannon Esq., et al*, Civil Action No. 2021-CP-26-06975;

21. Exhibit 4: Amended Complaint in *Justin Shayne Fulmer v. Melissa Emery Buchannon Esq.*, et al, Civil Action No. 2021-CP-26-06975;
22. Exhibit 5: Email from Richard Whiting to Bert von Herrmann, dated April 7, 2022;
23. Exhibit 6: Letter from William von Herrmann to Opposing Counsel, dated April 7, 2022, with attached photograph, chat with Apple Support, and photographs of text messages intercepted from Anna's iWatch;
24. Exhibit 7: Stipulation of Dismissal by Mr. Fulmer in *Justin Shayne Fulmer v. Melissa Emery Buchannon Esq.*, et al, Civil Action No. 2021-CP-26-06975;
25. Exhibit 8: Letter from Robert E. Lee to William B. von Herrmann, dated October 25, 2021;
26. Defendants' Reply to Plaintiffs' Response to Defendants' Motion for Reconsideration, filed November 22, 2023;
27. Defendants' Supplemental Memo in Opposition to Motion to Compel, filed March 8, 2024;
28. Plaintiffs' Reply to Defendants' Motion for Reconsideration of Order Granting Motion to Compel, filed April 17, 2024;
29. Defendants' Notice of Appeal, filed May 13, 2024;

Transcripts

30. Transcript of Hearing on Motion to Dismiss, held August 7, 2023;
31. Transcript of Hearing on Motion for Reconsideration of Order denying in part Motion to Dismiss, held December 19, 2023;
32. Transcript of Hearing on Motion to Compel, held March 19, 2024,

I certify that this designation contains no matter which is irrelevant to this appeal.

Dated: May 8, 2025

/s/ Robert E. Lee

Robert E. Lee, Esq., SC Bar No. 63052

P.O. Box 1096

Marion, SC 29571

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Counsel for Respondents

Other Counsel of Record:

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Counsel for Respondents

THE STATE OF SOUTH CAROLINA
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APPEAL FROM HORRY COUNTY
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Appellate Case No. 2024-000786

Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall Respondents,

v.

William Bertram von Herrmann and The von Herrmann Law Firm. Appellants.

PROOF OF SERVICE

I certify that I have served *Respondents' Initial Brief and Designation of Matter* upon the parties below by electronic mail, addressed as follows:

Douglas W. MacKelcan
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Skyler C. Wilson
swilson@csvl.law
COPELAND, STAIR, VALZ & LOVELL, LLP
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Charleston, SC 29401
Attorneys for Appellants

This 8th day of May 2025

/s/ Robert E. Lee

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Counsel for Respondents

Robert E. Lee

From: Robert E. Lee
Sent: Thursday, May 8, 2025 11:35 AM
To: Wilson, Skyler C.; Mackelcan, Douglas W.; Moran, Rosie; All Company
Cc: Dick Whiting; Steven Abrams; Kenneth R. Moss; Robert E. Lee; Meredith Baxley; Cindy Dassoulas
Subject: Coggeshall v. von Herrmann, Appellate Case No.: 2024-00786
Attachments: 5-8-25 Initial Brief & Designation of Matter of Respondents.pdf
Importance: High
Sensitivity: Confidential

Appellate Case No.: 2024-00786
Horry county Case No.: 2022-CP-26-06296

On behalf of the Respondents, Anna Coggeshall, Bryan Coggeshall and Katherin Coggeshall, attached for service upon you the Respondents' Initial Brief and Designation of Matter which we will be filing with the S.C. Court of Appeals today, May 8, 2025.

Robert E. Lee, Esq.
Attorney for the Respondents



Robert E. Lee
rel@rellawfirm.com

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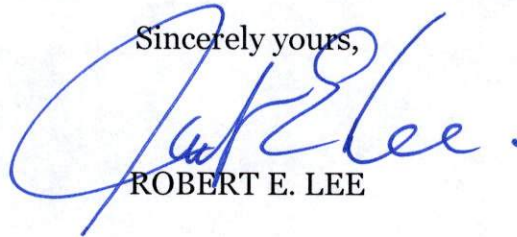
VIA E-MAIL (CTAPPFILINGS@SCCOURTS.ORG) & U.S. MAIL

Re: Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall v.
William Bertram von Herrmann and The Von Hermann Law Firm
Appeal Case No.: 2024-000786

Dear Ms. Kitchings:

Enclosed are the Respondents, Anna Coggeshall, Bryan Coggeshall,
and Katherine Coggeshall Initial Brief, Designation of Matter, Proof of
Service, and Respondent's service email and letter to Appellants' Counsel.

Sincerely yours,



ROBERT E. LEE

REL:mlb

Enclosures: *As stated above*

cc: Douglas MacKelcan, Esq.
Skyler C. Wilson, Esq.
(Via E-Mail)

All Respondents' Counsel
(Via E-Mail Only)

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ATTORNEY - AT - LAW

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