

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Dale E. Van Slambrook, Circuit Court Judge

Case No. 2018-CP-10-03929

Appellate Case No. 2025-001689

John Doe, Appellant,

v.

Bishop of Charleston, a Corporation Sole, and
the Bishop of the Diocese of Charleston, in his official capacity, Respondents.

RESPONDENTS' MOTION TO SUPPLEMENT RECORD ON APPEAL

Pursuant to Rule 212(b), SCACR, Respondents Move to Supplement the Record on Appeal to include unredacted excerpts of depositions that Respondents designated for inclusion in the Record or which are cited in Respondents' brief, but which testimony is redacted in the materials included in the Record. These deposition excerpts are:

1. Excerpts from Deposition of Mrs. John Doe (Exhibit A);
2. Excerpts from Deposition of Sally Duffy (Exhibit B);
3. Excerpts from Deposition of John Doe (Exhibit C); and
4. Excerpts from Deposition of Jason Flassing (Exhibit D).

(Signature page to follow.)

June 22, 2026

Respectfully submitted,

s/ Richard S. Dukes, Jr.

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ATTORNEYS FOR RESPONDENTS

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JOHN DOE,

PLAINTIFF,

vs.

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

DEFENDANTS.

DEPOSITION OF:
MRS. JOHN DOE
September 12, 2019

Given before Debbie Rayl, Court Reporter and Notary Public in and for the State of South Carolina, in the law offices of Turner, Padgett, Graham and Laney, Greenville, South Carolina, on Thursday, the 12th day of September, 2019 commencing at 11:31 a.m.

Job No. CS3521079

1 BY MR. DUKES:

2 Q. So he talked about being ashamed?

3 A. Uh-huh (yes). He couldn't tell me,
4 he said.

5 Q. And he would never tell you what he
6 was ashamed about?

7 A. Not until later, sir.

8 Q. Okay. Did he tell -- what did he
9 tell you he was ashamed about in the 2010,
10 2011, '12 -- when the depression started?

11 A. It was not like a sit-down story.

12 Q. I got you.

13 A. He would give me bits and pieces
14 when he was just too broken down. He'd give me
15 a little bit -- something.

16 Q. Can you help me out and kind of
17 walk me through that -- what you learned and
18 when you learned it?

19 A. Little things like, "I don't want
20 to tell because I'm so ashamed, but I was
21 molested."

22 So being a mother all I could do is
23 to hug him.

24 Q. And when did he tell you -- first
25 tell you had been molested?

1 Q. --- before you moved up here, where
2 would you have put him on the scale?

3 A. He was depressed and sad.

4 Q. Okay. So in 2012 before you moved
5 up here he was how far into the depressed and
6 sad state? Was it crying all the time?

7 A. A workable depression.

8 Q. Okay. So he couldn't work?

9 A. No, no. Work -- he was workable.
10 He could work it out within his -- his regular
11 life -- his everyday life. Like many people
12 live with depression and take their medication
13 and they have some days that he was down and
14 other days that he was fine. Like, you know,
15 there were ups and downs.

16 Q. Okay. And while you were in
17 Charleston you didn't know what was triggering
18 this depression?

19 A. No, sir.

20 Q. Okay. And he didn't give you any
21 clues?

22 A. He said he couldn't tell me.

23 Q. Okay. When he mentioned that he
24 was molested were you living in Charleston or
25 were you living in Greenville?

1 back when he was -- 2014 or so when he was
2 going to the VA or early in 2016? Was he
3 paranoid about anything then?

4 A. No.

5 Q. Okay.

6 A. He was stressed out.

7 Q. Why?

8 A. Well, I mean basically you could
9 see it. I mean, his demeanor -- I mean John
10 was an outgoing man, talked to everybody. And
11 so he changed. His personality changed.

12 Q. When did that happen?

13 A. He started declining I would say
14 maybe 2000 or something -- before we came here.

15 Q. And his personality started to
16 change?

17 A. Yeah.

18 Q. Was he taking any medications at
19 the time his personality began to change in
20 2000?

21 A. I do not know, sir.

22 Q. Okay. Was anything going on in
23 your lives that you think triggered this
24 personality change?

25 A. I don't think so. I have the best

1 job I had. I was having a very good job, so I
2 was making enough money and he had his
3 business. We were doing pretty good.
4 Actually, it was the best time of our life that
5 we -- when it comes to money that we make the
6 better money.

7 Q. And was it a sudden change in his
8 personality like somebody flipped a switch or
9 was it gradual?

10 A. Gradual.

11 Q. And how long did that gradual
12 process take until he had changed?

13 A. I would say maybe two years.

14 Q. Okay. So from 2000 to 2002 or so?

15 A. (Witness nods head).

16 Q. And before he was outgoing and
17 engaging and liked people -- I'm -- I don't
18 mean to be putting words in your mouth.

19 A. No, no, no. Yeah.

20 Q. Is that accurate?

21 A. Yeah.

22 Q. And then two years later, how would
23 you describe his personality?

24 A. He started being a little retreat
25 and less social, I would say. More -- when he

CERTIFICATE

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

I, Debbie Rayl,

Professional Verbatim Reporter and Notary

Public for the State of South Carolina, certify

that I did have MRS. JOHN DOE to appear before

me at 11:31 a.m. on the 12th day of September,

2019, in the office of Turner, Padget, Graham

and Laney, Greenville, South Carolina; that the

witness was duly sworn to tell the truth, the

whole truth and nothing but the truth; that the

foregoing pages constitute a true and accurate

transcript of the testimony given at that time

and place.

I further certify that I am not of

counsel or kin to any of the parties to this

cause of action, nor am I interested in any

manner in its outcome.

IN WITNESS WHEREOF I have hereunto

set my hand and seal this 16th day of

September, 2019.



Debbie Rayl, Notary Public

My Commission expires January 24, 2021

EXHIBIT B

Sally Duffy - 11/26/2019

Page 1

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON) NINTH JUDICIAL CIRCUIT

John Doe,)
)
Plaintiff,)
) Civil Action No.:
) 2018-CP-10-3929

v.)
)
Bishop of Charleston, a Corporation)
Sole, and the Bishop of the Diocese)
of Charleston, in his official)
capacity,)
)
Defendants.)

DEPOSITION OF: SALLY DUFFY
DATE TAKEN: Tuesday, November 26, 2019
TIME: 2:35 P.M.
PLACE: Richter Law Firm
622 Johnnie Dodds Boulevard
Mount Pleasant, South Carolina
REPORTED BY: MARY ANN RIDENOUR, RPR, CLR, CVR-S
and Notary Public

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1 stuff is kind of saying, well, repressed memory and
2 dissociative amnesia, sometimes they use them as equal
3 things. They're saying dissociative memory -- I mean,
4 you know, repressed memory is a form of dissociative
5 amnesia and that's kind how I look at it.

6 Q. But it's not a synonym of --

7 A. It's not a complete synonym. But -- well, it
8 depends on what you read, actually.

9 Q. It includes global amnesia.

10 A. Well, true.

11 Q. It includes, for lack of a better word, an
12 out-of-body experience?

13 A. Well, yeah. I'm -- I'm -- I'm kind of funny
14 on that.

15 Q. You think that's -- that that happens?

16 A. I think people perceive it as happening, as
17 opposed to somebody's soul leaving their body. I've --
18 I'm a little skeptical.

19 Q. Okay. So as a coping strategy for trauma,
20 imaging that you're --

21 A. Imaging that your soul is leaving, imagining
22 that you're leaving that situation, sure. I'm
23 somewhere else.

24 Q. Okay. But actually --

25 A. This isn't happening.

1 Q. -- doing it --

2 A. Yeah, but I'm not going to -- I don't see
3 anybody's soul floating up from their body, so...

4 Q. Okay.

5 A. I'm sorry, I didn't mean -- I hope I didn't
6 offend anybody.

7 Q. No, I'm just here to have a pleasant
8 conversation with you.

9 With repressed memory patients, is a history
10 of memory disorders an important factor to consider?

11 A. That's an excellent question.

12 Q. And Larry didn't object to the form of it.

13 A. No, he didn't.

14 MR. RICHTER: Well...

15 BY MR. DUKES:

16 A. Well, I think it's an interesting one and
17 one, you know, we can't disprove. You know, I mean, if
18 somebody's got severe organic memory loss, I don't hear
19 repressed memories from them. Somebody's got dementia,
20 I don't mean really, you know, significant dementia,
21 I've never heard repressed memories come from them. I
22 mean, they might say, Where's -- I want to go home.
23 Where my's mother? But that's not repressed memory;
24 that's disordered memory.

25 Q. Is there a way to test whether a memory that

1 is recovered is part of a memory disorder and not
2 really a repressed memory?

3 A. Not -- not really. But I can test for memory
4 disorders. I do it all the time. Some of them -- some
5 of the tests are a little bit more involved than
6 others.

7 But sometimes I do something depending on
8 time. I do a quick-and-dirty test. It's a not a mini
9 mental status; it's a lot more of the memory stuff.
10 And I do do some those of tests to make sure that the
11 person doesn't have early dementia or that they
12 aren't -- they don't have a memory problem. And that
13 kind of helps. Because if they score okay on that, I'm
14 not saying that it gives more credence to dissociative
15 memory, but I'm saying that at least rules out organic
16 basis for memory impairment.

17 Q. When did John Doe either express or repress
18 any of his memories?

19 A. When did he do it?

20 Q. Uh-huh.

21 A. I think he did it in seventh grade.

22 Q. Okay.

23 A. Because he didn't even remember being there.

24 Q. When did he begin remembering again? Do you
25 have an opinion on that?

1 A. That's interesting, because the depositions,
2 the notes, everything is a mess in terms of that. And
3 that's why I was also saying triggers, where I don't
4 see any triggers.

5 Q. Uh-huh.

6 A. And let me see if I can find it. He did
7 completely fall apart when he moved to Greenville
8 without his wife. I think that was a huge --

9 Q. In 2012?

10 A. 2012. I think that was a huge, huge thing
11 for him. He -- what did he tell me?

12 Q. And Ms. Whelan's notes, her first interview,
13 did you note that, that he told her he began to
14 remember being abused several years ago, several years
15 prior to 2016?

16 A. Yeah.

17 Q. Right after he had bypass surgery?

18 A. He mentioned that, yes. He mentioned that.
19 But...

20 Q. And the bypass surgery he had was in 1999.

21 A. Yeah, he mentions that.

22 Q. And he was pretty specific with me when I
23 would say about a bypass surgery and he would say, no,
24 that was a stint.

25 A. Yeah. He did not come out to me and say that

1 happened right after my thing. He talked more about
2 moving to Greenville in --

3 Q. In 2012?

4 A. In 2012. And that's when the -- that's when
5 all -- he started having all kind of problems, couldn't
6 cope and he was overwhelmed.

7 Q. And --

8 MR. RICHTER: Please don't interrupt her
9 answer. She's got a right to give her answer.

10 BY MR. DUKES:

11 A. And let me see if I can find this thing. And
12 I got the sense that he was -- it was around 2012 that
13 he started having some -- some blips of memory. That's
14 my opinion from what -- everything I've read and from
15 what he told me, because he was completely falling
16 apart at that point and he was overwhelmed by emotion,
17 by negative emotion. But, again, it -- I mean, there
18 are so many -- I mean, think about it, these
19 depositions, the notes, everything, there were so many
20 inconsistencies. I had to make notes on everything.
21 And then I had to kind of put them together that made
22 some kind of sense to me, which was hard because there
23 were so many inconsistencies.

24 Q. I believe his wife said that before they
25 moved to Greenville, when they were still in

1 Charleston, he began to have uncontrollable crying and
2 bouts of severe depression. That's when they quit
3 going dancing?

4 A. Yes.

5 Q. And that she would ask him, Why? And he
6 said, I can't tell you, I'm so ashamed?

7 A. Yes. And what she told me was that things
8 got bad after -- after he moved to Greenville and she
9 stayed in Charleston. And he got -- started crying and
10 he changed. He became a different man. What do we do
11 with that?

12 Q. So we really cannot pin down when Mr. Doe
13 began to remember?

14 A. Uh-uh. I think there were blips just like --
15 recovered memories seldom come in one big tsunami.
16 They come in little blips. And I think maybe he
17 started having some tiny little blips in Charleston.

18 But, apparently, I think -- I think --
19 personally, I think the trigger for him primarily was
20 the overwhelming negative emotions and stress
21 associated with moving to Greenville, where he didn't
22 really want to go, and having to live without his wife.

23 I think -- I don't know what -- I don't know
24 what -- I think that man would probably become overtly
25 suicidal if something happened to his wife, because he

1 can't cope without her.

2 And that's when she told me things changed.

3 I mean, so what are we supposed to believe? I mean, I
4 don't know. And -- and, yet, I don't believe it's
5 necessarily that unusual, because I've heard it all the
6 time, you know, a little piece here, a little piece
7 there, and then...

8 Q. And if somebody came to you and said, All of
9 sudden, it came back to me like it was --

10 A. Happening just again?

11 Q. Yeah.

12 A. I've seen that happen, but I think it's rare.
13 I think it's relatively rare. I do think it can
14 happen. I've only heard -- I heard -- I've heard of a
15 couple of people, a couple, three, four people tell me
16 that. But most people talk about it coming in bits and
17 pieces, until -- until something rips the lid off. And
18 he talked about the bomb.

19 Q. And that's usually therapy?

20 A. Often it's therapy because they start talking
21 about it and they feel a safe place. Sometimes it's
22 some other overwhelming life stressor. The negative --
23 we go back to the state-dependent learning, where they
24 start experiencing some of the same emotions that they
25 did when they were traumatized.

1 health problems, physical health problems. We know
2 that. And we know how to teach it. But I haven't been
3 able to nail down if that lack of resilience
4 contributes to repressed memory, so that's why I'm
5 not -- that's why I didn't put it in here.

6 Q. Okay. You'll agree with me that Mr. Doe has
7 had a difficult life?

8 A. Oh, yeah.

9 Q. And that there are some significant traumas
10 that --

11 A. Uh-huh.

12 Q. -- impacted him, the sexual abuse at age six?
13 How significant do you put that in his --

14 A. Well, that was a trauma which could set him
15 up to have more difficulties with trauma down the road.
16 However, like I said in my report, I don't -- I do not
17 think that was a proximate cause of PTSD. He did not
18 have a significant relationship with this kid. It
19 happened once or three times, whatever, a kid down the
20 street. I think it's bothered him, but I don't think
21 it was -- I think in the grand scheme of things, I
22 don't think -- I think he just went about his life.

23 Q. What about his relationship with his
24 father --

25 A. Oh, I think that's --

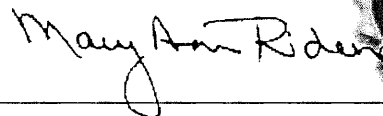
C E R T I F I C A T E

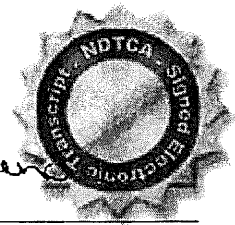
STATE OF SOUTH CAROLINA:
COUNTY OF CHARLESTON:

I, MARY ANN RIDENOUR, Registered Professional
Reporter and Notary Public, State of South Carolina at
Large, certify that I was authorized to and did
stenographically report the foregoing deposition of
Sally Duffy; and that the transcript is a true record
of the testimony given by the witness, and was sworn as
such.

I further certify that I am not a relative,
employee, attorney or counsel of any of the parties,
nor am I a relative or employee of any of the parties'
attorney or counsel connected with the action, nor am I
financially interested in the action.

WITNESS MY HAND AND OFFICIAL SEAL this 6th day of
December, 2019, in the City of Charleston, County of
Charleston, State of South Carolina.





Mary Ann Ridenour, RPR, CLR
and Notary Public
My commission expires:
March 14, 2021

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EXHIBIT C

Page 1

STATE OF SOUTH CAROLINA) IN THE COURT OF
COUNTY OF CHARLESTON) COMMON PLEAS
CASE NO: 18-CP-10-3929

JOHN DOE,)
)
 PLAINTIFF,)
)
 vs.)
)
 BISHOP OF CHARLESTON, A)
 CORPORATION SOLE, AND THE)
 BISHOP OF THE DIOCESE OF)
 CHARLESTON, IN HIS OFFICIAL)
 CAPACITY,)
)
 DEFENDANTS.)

DEPOSITION OF:

JOHN DOE
September 12, 2019

Given before Debbie Rayl, Court

Reporter and Notary Public in and for the State
of South Carolina, in the law offices of Turner,
Padget, Graham and Laney, Greenville, South
Carolina, on Thursday, the 12th day of
September, 2019 commencing at 2:03 p.m.

Job No. CS3521079

1 Alley in town.

2 Q. Okay. All right. When was the
3 first time Chris Hartnett molested you?

4 A. In school.

5 Q. Give me a -- without describing the
6 actions -- what, where, what time of day, that
7 sort of thing.

8 A. I can't remember the time of day.
9 Might have been after school. Maybe it was
10 during school. But it happened in the
11 lunchroom/hallway if you want to call it.

12 Q. If you're looking at the school
13 from King Street ---

14 A. To the right.

15 Q. --- over on the right?

16 A. Yes, sir.

17 Q. That kind of separate building or
18 has a breezeway over there?

19 A. I think it is a separate building
20 with a breezeway.

21 Q. Yes. And what did Hartnett do on
22 that occasion?

23 A. Fellatio.

24 Q. Okay. Did you tell anybody?

25 A. No.

1 Q. Did you ever tell anybody?

2 A. No.

3 Q. Did he pull your pants down? How
4 did that happen?

5 A. That's the part that's a little
6 fuzzy.

7 Q. I'm sorry?

8 A. I said that's the part that for me
9 is a little fuzzy.

10 Q. Okay.

11 A. But that was just the first time.

12 Q. Okay. Is that what you remember
13 Hartnett did most often is perform fellatio?

14 A. No. It went on from there.

15 Q. Okay. How did it escalate?

16 A. In Columbia.

17 Q. All right. Was it just the one
18 time in the lunchroom and then the trip to
19 Columbia?

20 A. No. I believe it happened on the
21 side of the school after the first time.

22 Q. And what did he do?

23 A. Same thing.

24 Q. Okay. Did you resist?

25 A. No.

1 Q. But you didn't tell -- didn't go to
2 the doctor?

3 A. Huh-uh (no).

4 Q. Didn't tell your parents?

5 A. Huh-uh (no).

6 Q. Didn't tell anybody at the school?

7 A. No. I told my brother-in-law that
8 I was having problems and -- part wise I was
9 having problems and asked if the church would
10 help me.

11 Q. And that was Thomas?

12 A. Thomas.

13 Q. ___?

14 A. Yes.

15 Q. And when did you talk to Thomas
16 about that?

17 A. I don't remember.

18 Q. Was it shortly before you called
19 Louisa Storen?

20 A. I believe that it was around the
21 same time.

22 Q. Okay. Did Thomas give you Louisa's
23 phone number or did Larry?

24 A. No, Thomas did.

25 Q. Thomas did?

1 him.

2 BY MR. DUKES:

3 Q. They did?

4 A. Yeah. So that's the only time I
5 know of anything like that.

6 Q. All right. Were you aware of any
7 mandate from the Vatican that payments to
8 sexual abuse victims be kept secret?

9 A. No, sir. Don't even keep up with
10 all that stuff.

11 Q. Were you ever taught by anybody
12 that you have to conceal sexual crimes of
13 employees of the Diocese?

14 A. No, sir.

15 Q. Do you think anybody at the Diocese
16 intended for Hartnett and Brooks to harm
17 you?

18 MR. RICHTER: Object
19 to the form of the question.

20 THE WITNESS: My heart
21 says no. I've never known any bad -- bad
22 people in the church but I would have rather
23 not had to remember all this than sit here and
24 talk about it like that. I would rather have
25 kept it in the deep places I had it at. That I

1 can tell you.

2 BY MR. DUKES:

3 Q. Did you choose to go to Sacred
4 Heart or did your parents?

5 A. I think it was dad -- my dad.

6 Q. Have you ever heard of the
7 mandatory reporting statute?

8 A. No, sir.

9 Q. Okay. And do you know anything
10 about the church failing to report any sexual
11 abuser who's alive to the appropriate
12 authorities?

13 A. No, sir.

14 Q. Are you aware of anybody entering
15 into an agreement to harm you -- the church
16 entering into an agreement with somebody --
17 with somebody else to harm you?

18 A. No. Not at all.

19 Q. Is there -- one of the requirements
20 of a civil conspiracy count is what's called
21 special damages. I mean, it's damages that are
22 different from the harm you suffered --
23 physical or emotional or whatever -- but it --
24 can you identify for me anything that would be
25 special damages?

CERTIFICATE

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

I, Debbie Rayl,

Professional Verbatim Reporter and Notary

Public for the State of South Carolina, certify

that I did have JOHN DOE to appear before me at

2:03 p.m. on the 12th day of September, 2019,

in the office of Turner, Padget, Graham and

Laney, Greenville, South Carolina; that the

witness was duly sworn to tell the truth, the

whole truth and nothing but the truth; that the

foregoing pages constitute a true and accurate

transcript of the testimony given at that time

and place.

I further certify that I am not of

counsel or kin to any of the parties to this

cause of action, nor am I interested in any

manner in its outcome.

IN WITNESS WHEREOF I have hereunto

set my hand and seal this 16th day of

September, 2019.



Debbie Rayl, Notary Public

My Commission expires January 24, 2021

EXHIBIT D

Page 1

STATE OF SOUTH CAROLINA) IN THE COURT OF
COUNTY OF CHARLESTON) COMMON PLEAS
CASE NO: 18-CP-10-3929

JOHN DOE,)
)
PLAINTIFF,)
)
vs.)
)
BISHOP OF CHARLESTON, A)
CORPORATION SOLE, AND THE)
BISHOP OF THE DIOCESE OF)
CHARLESTON, IN HIS OFFICIAL)
CAPACITY,)
)
DEFENDANTS.)

DEPOSITION OF:
JASON FLASSING
September 19, 2019

Given before Cecelia Englert, Court
Reporter and Notary Public in and for the State
of South Carolina, in the offices of Sherbondy
Psychiatric Services, Piedmont, South Carolina,
on Thursday, the 19th day of September, 2019
commencing at 8:05 a.m.

Job No. CS3521119

1 Q. How did you test that?

2 A. That would be more of a direct
3 observation -- him being able to provide a
4 history of events that was accurate. I mean --
5 -

6 Q. What history of events did he
7 provide you?

8 A. His -- basically his -- the history
9 of his own mental health. You know, he was
10 able to provide symptoms from the time he was a
11 child. He knew, you know, what year it was.

12 He was able to describe specifics
13 as it related to some trauma related to the
14 passing of his wife and kids. It's mostly done
15 by direct observation.

16 Q. Okay. What other history did he
17 provide you?

18 A. He did provide a history that he
19 was experiencing flashbacks and frequent
20 tearful episodes.

21 Q. What flashbacks?

22 A. He would report, I believe, of
23 trauma experienced when he was a child of being
24 molested by a priest. That was his consistent
25 ---

1 Q. Did he mention -- did he have any
2 flashbacks about being molested a neighboring -
3 - a neighborhood teenager?

4 A. That was not brought up. I'm not
5 aware of that.

6 Q. What about trauma -- flashbacks or
7 trauma from his wife and children dying in a
8 fire?

9 A. I do believe that would be probably
10 some of the symptoms of his depression -- I do
11 recall him speaking to that, yes.

12 Q. Okay. What did he say?

13 A. He would describe symptoms of
14 seeing their bodies, I believe. I don't recall
15 specifics.

16 Q. What trauma did he report over the
17 course of his life that contributed to his PTSD
18 and depression?

19 A. Can you explain that question a
20 little -- or repeat that question?

21 Q. Sure. We're aware of a number of
22 traumatic events in Mr. Doe's life. And I was
23 wondering what traumas he told you about that
24 are contributing to his mental health
25 condition.

9-19-19

Page 31

1 CERTIFICATE

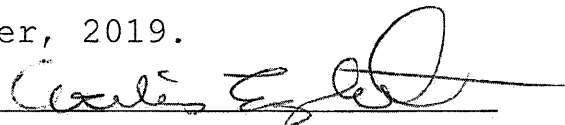
2 STATE OF SOUTH CAROLINA

3 COUNTY OF HORRY

4 I, Cecelia Englert,
5 Professional Verbatim Reporter and Notary
6 Public for the State of South Carolina, certify
7 that I did have JASON FLASSING to appear before
8 me at 8:05 a.m. on the 19th day of September,
9 2019, in the office of Sherbondy Psychiatric
10 Services, Piedmond, South Carolina; that the
11 witness was duly sworn to tell the truth, the
12 whole truth and nothing but the truth; that the
13 foregoing pages constitute a true and accurate
14 transcript of the testimony given at that time
15 and place.

16 I further certify that I am not of
17 counsel or kin to any of the parties to this
18 cause of action, nor am I interested in any
19 manner in its outcome.

20 IN WITNESS WHEREOF I have hereunto
21 set my hand and seal this 22nd day of
22 September, 2019.

23 

24 Cecelia Englert, Notary Public

25 My Commission expires June 6, 2028

RAYL REPORTING SERVICE

P.O. Box 2833, Myrtle Beach, South Carolina 29578
(843) 293-1774 (843) 424-3431

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Jun 22 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Dale E. Van Slambrook, Circuit Court Judge

Case No. 2018-CP-10-03929

Appellate Case No. 2025-001689

John Doe, Appellant,

v.

The Diocese of Charleston, a Corporation Sole, and
the Bishop of the Diocese of Charleston, in his official capacity, Respondents.

PROOF OF SERVICE

I certify this 22nd day of June 2026 that I have served a copy of **RESPONDENTS'**
MOTION TO SUPPLEMENT RECORD ON APPEAL upon other counsel of record, by
electronic mail, addressed to the following:

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dhaller@hallerlawfirm.com

ATTORNEY FOR APPELLANT

(Signature page to follow.)

June 22, 2026

s/ Richard S. Dukes, Jr.

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