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SC Court of Appeals

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

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Hon. William C. McMaster III, Circuit Court Judge

Case Nos. 2022-CP-10-04031
2018-CP-10-05802
2019-CP-10-05892

Consolidated as Appellate Case No.: 2026-000191

John Doe 305, Julie McDonald, and Richard McDonald, Appellants,

v.

Lawrence E. Richter, Jr., David K. Haller, Richter and
Haller, LLC, and The Bishop of Charleston a corporation
Sole, Defendants,

AND

Jane Doe 304, Appellant,

v.

Lawrence E. Richter, Jr., David K. Haller, Richter and
Haller, LLC, and The Bishop of Charleston a corporation
Sole, and Robert E. Guglielmon, Bishop of Charleston, Defendants,

AND

Robert Chimento, Appellant,

v.

Lawrence E. Richter, Jr., David K. Haller, Richter and
Haller, LLC, and The Bishop of Charleston a corporation
Sole, and Robert E. Guglielmon, Bishop of Charleston, Defendants,

of whom Lawrence E. Richter, Jr., David K. Haller, and

Richter and Haller, LLC are the Respondents

**JOINT DESIGNATION OF MATTER OF RESPONDENTS LAWRENCE E. RICHTER,
JR., DAVID J. HALLER, AND RICHTER AND HALLER, LLC**

Respondents Lawrence E. Richter, Jr., David J. Haller, and Richter and Haller, LLC, jointly designate the following matter to be included in the Record on Appeal:

1. Order Lawyer Defendants' Motions to Dismiss, C/A No. 2018-CP-10-05802, December 5, 2025.
2. Order Lawyer Defendants' Motions to Dismiss, C/A No. 2019-CP-10-05892, December 5, 2025.
3. Order Lawyer Defendants' Motions to Dismiss, C/A No. 2022-CP-10-04031, December 5, 2025.
4. Order filed December 30, 2025 in C/A No. 2018-CP-10-05802.
5. Order filed December 30, 2025 in C/A No. 2019-CP-10-05892.
6. Order filed December 30, 2025 in C/A No. 2022-CP-10-04031.
7. Complaint, 2018-CP-10-05802, filed March 31, 2016.
8. Complaint, 2019-CP-10-05892, filed November 10 2019.
9. Second Amended Complaint filed in C/A No 2019-CP-10-05892.
10. Complaint, 2006-CP-18-01310, filed August 15, 2006.
11. Complaint, 2006-CP-18-01311, filed August 15, 2006.
12. Complaint, 2006-CP-18-01636, filed October 6, 2006.
13. Complaint, 2010-CP-10-05520, filed July 9, 2010.
14. Complaint, 2010-CP-10-07233, filed September 3, 2010.
15. Complaint, 2012-CP-10-05559, filed August 23, 2012.
16. Complaint, 2013-CP-23-01843, filed April 2, 2013.
17. Complaint, 2013-CP-10-04175, filed July 17, 2013.

18. Complaint, 2013-CP-10-04176, filed July 17, 2013.
19. Complaint, 2015-CP-10-05486, filed October 12, 2015.
20. Complaint, 2016-CP-10-01632, filed March 31, 2016.
21. Amended Complaint with exhibit, C/A No. 2:19-cv-03409-RMG, December 23, 2019.
22. Complaint, 2022-CP-10-04031, filed August 30, 2022.
23. Affidavit of Infinger, July 22, 2008.
24. Petition for Original Jurisdiction, October 20, 2020.
25. Order Designating Case Complex, 2006-CP-18-01310, -01311, -01636, filed October 17, 2006;
26. Order dated January 19, 2007 with attachments, filed in C/A Nos. 2006-CP-18-01310, -01311, -01636.
27. Order Approving Settlement filed July 30, 2007 with attachments, filed in C/A Nos. 2006-CP-18-01310, -01311, -01636.
28. Order filed August 31, 2007 with attachment, filed in C/A Nos. 2006-CP-18-01310, -01311, -01636.
29. Order [of the Supreme Court denying petition to file in original jurisdiction], March 19, 2009;
30. Order entered March 23, 2009, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
31. Opinion No. 26984 [of the Supreme Court], filed June 13, 2011;
32. Order of Recusal, January 24, 2013, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
33. Order of S.C. Supreme Court, April 30, 2013.
34. Order of Supreme Court, June 12, 2015, assigning C/A Nos. 2006-CP-18-01310, -01311, -01636 to Judge Nicholson.
35. Letter from Bruner to Clerk of Court, June 22, 2016, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
36. Order on Limited Collateral Review, filed October 26, 2016;
37. Order on Lawyer Defendants' Motions for Summary Judgment, filed August 11, 2017;
38. Text Order to Remand, C/A No. 2:19-cv-03409-RMG, February 20, 2020.

39. Order Staying Case filed June 8, 2020 in C/A No 2019-CP-10-05892.
40. Petition for Original Jurisdiction filed October 20, 2020 in the S.C. Supreme Court.
41. Proposed Complaint filed October 20, 2020 in the S.C. Supreme Court, with exhibits.
42. Opinion, March 3, 2021, Appellate Case Number 2017-001996.
43. Order filed April 19, 2021 in Appellate Case No. 2020-001415.
44. Order filed June 15, 2021 in Appellate Case No. 2020-001415.
45. Order of S.C. Supreme Court, August 6, 2021, in Appellate Case No. 2021-000668.
46. Order of S.C. Court of Appeals, October 25, 2021, in Appellate Case No. 2017-001996.
47. Order of S.C. Court of Appeals, January 11, 2022, in Appellate Case No. 2021-001525.
48. Order of S.C. Supreme Court, November 10, 2022, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
49. Letter from Meyers to Judge Taylor, November 16, 2022.
50. Order filed March 24, 2023 in C/A Nos. 2006-CP-18-1310, -1311, and -1636.
51. Order Remanding Case filed June 15, 2023 in C/A No. 2022-CP-10-04031.
52. Order filed September 10, 2025 in Appellate Case No. 2020-001415.
53. Order filed November 6, 2025 in C/A No. 2018-CP-10-05802.
54. Order filed November 6, 2025 in C/A No. 2019-CP-10-05892.
55. Order filed November 6, 2025 in C/A No. 2022-CP-10-04031.
56. Motion to Certify Classes and for Preliminary Approval of Class Settlement, 2006-CP-18-01310, -01311, and -01636, filed October 6, 2006;
57. Motion to Certify Classes and for Preliminary Approval of Class Settlement with attachments, 2006-CP-18-01310, -01311, and -01636, filed January 17, 2007;
58. Motion to Dismiss filed May 6, 2019, in 2018-CP-10-05802.
59. Motion to Dismiss filed May 3, 2019 in 2018-CP-10-05802.
60. Motion to Dismiss filed March 18, 2019 in C/A No 2019-CP-10-05892.
61. Motion to Dismiss filed April 6, 2019 in C/A No 2019-CP-10-05892.

62. Joint Motion to Stay Case filed June 3, 2020 in C/A No 2019-CP-10-05892.
63. Motion to Intervene filed August 29, 2022 in class action cases.
64. Motion to Dismiss filed September 1, 2023 in 2022-CP-10-04031.
65. Motion to Dismiss filed September 5, 2023 in 2022-CP-10-04031.
66. Memorandum in Support of Motion to Alter or Amend, submitted by Gregg Meyers, 2006-CP-18-01310, -01311, and -01636, filed August 22, 2007;
67. Letter to Court with final settlement accounting (8 pages), 2006-CP-18-01310, -01311, -01636, dated March 10, 2008.
68. Petition to Appear as Amicus Curiae, June 19, 2008, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
69. Affidavit of Marvin Infinger, July 22, 2008, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
70. Affidavit of John Freeman, February 28, 2009, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
71. Letter from Shahid to Judge Goodstein, April 15, 2009, in C/A Nos. 2006-CP-18-01310, -01311, -01636, with enclosure (3 pp. total).
72. S.C. Supreme Court Administrative Order of July 26, 2006 (2006-07-26-01).
73. Motion to Certify Classes and for Preliminary Approval of Class Settlement with attachments, 2006-CP-18-01310, -01311, and -01636, filed January 17, 2007.
74. Plaintiffs' Petition for Attorneys' Fees and Litigation Costs, February 14, 2007, with exhibits (6 affidavits).
75. Objection to Class Settlement, filed by Meyers, February 2, 2007.
76. Motion to Alter or Amend submitted by Gregg Meyers, 2006-CP-18-01310, -01311, and -01636, dated August 6, 2007.
77. Objections to Proposed Order in 2006-CP-18-01310, -01311, and -01636, filed August 1, 2007.
78. Memorandum in Support of Motion to Alter or Amend, submitted by Gregg Meyers, 2006-CP-18-01310, -01311, and -01636, filed August 22, 2007.
79. Plaintiff's Memorandum Opposing the Defendants' motions to dismiss with exhibits filed October 27, 2019, in 2018-CP-10-05802.
80. Notice of Removal, C/A No. 2:19-cv-03409-RMG, December 9, 2019.

81. Plaintiffs' Consolidated Memorandum in Opposition to Defendants' Motions, June 1, 2022.
82. Notice of Removal filed September 2, 2022 in C/A 2022-CP-10-04031.
83. Plaintiffs' Notice of Supplemental Authority filed April 30, 2024.
84. Affidavit of John P. Freeman with two attachments, 2006-CP-18-01310, -01311, and -01636, filed February 14, 2007;
85. E-mail from Meyers to Bruner, August 30, 2023.
86. E-mail from Bruner to Meyers, September 1, 2023.
87. Plaintiffs' Memorandum in Opposition to Motions to Dismiss with exhibits filed October 2, 2025.
88. Defendants' Supplemental Memorandum in Support of Motions to Dismiss filed October 3, 2025.
89. Plaintiffs' Supplemental Memorandum on Jurisdiction filed October 17, 2025.
90. Defendants' Supplemental Memorandum on Jurisdiction filed October 17, 2025.
91. Affidavit of Service as to Richter filed March 23, 2020, C/A No 2019-CP-10-05892.
92. Affidavit of Service as to Richter & Haller filed March 23, 2020, C/A No 2019-CP-10-05892.
93. Transcript of Record, March 9, 2007, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
94. Transcript of Record, July 13, 2007, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
95. Transcript of Record, August 9, 2007, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
96. Transcript of Record, January 29, 2009, in C/A Nos. 2006-CP-18-01310, -01311, -01636.
97. Transcript of Record, October 7, 2025, in C/A Nos. 2018-CP-10-05802, 2019-CP-10-05892, and 2022-CP-10-04031.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

GALLIVAN, WHITE & BOYD, PA

/s/ John E. Cuttino

John E. Cuttino, Bar No. 1519

Post Office Box 7368 (29202)

1201 Main Street, Suite 1200 (29201)

Columbia, South Carolina

(803) 724-1714

jcuttino@gwblawfirm.com

Attorney for David K. Haller

BRUNER, POWELL, WALL & MULLINS, LLC

/s/ Benjamin C. Bruner

Benjamin C. Bruner, Bar No. 77544

Post Office Box 61110 (29260)

1735 St. Julian Place, Suite 200 (29204)

Columbia, South Carolina

(803) 252-7693

bbruner@brunerpowell.com

*Attorneys for Lawrence E. Richter, Jr. and
Richter & Haller, LLC*

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Court Judge

Case Nos.: 2010-CP-10-05520, 2010-CP-10-07233,
2012-CP-10-05559, 2013-CP-10-03733, 2013-CP-10-04175,
2013-CP-10-04176, 2015-CP-10-05486, 2016-CP-10-01632

Consolidated as Appellate Case No.: 2017-001996

John Doe 2 and Jane Doe 4, John Doe 10, Jane Doe 11,
John Doe 193, Father Doe 194, John Doe 194,
John Doe 245 and Father Doe 245, and John Doe 297, Appellants,

v.

The Bishop of Charleston, A Corporation Sole; Robert Gugliemone,
The Bishop of Charleston, in his official Capacity; Rev. Monsignor
Martin Laughlin, former Administrator of the Diocese of Charleston,
in his official Capacity; Robert J. Baker, former Bishop of
Charleston, in his official Capacity; Lawrence E. Richter, Jr.;
David K. Haller; and Richter and Haller, LLC, Respondents.

CERTIFICATE OF COUNSEL

Pursuant to Rule 209(c), SCACR, the undersigned certifies that this Designation of Matter
contains no matter which is irrelevant to the appeal.

Benjamin C. Bruner
Benjamin C. Bruner, Esquire