

The State of South Carolina
In The Court of Appeals

Appeal from Charleston County
Hon. William C. McMaster III, Circuit Court Judge

Appeal 2026-000191

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

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Jul 23 2026

SC Court of Appeals

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. Guglielmone,
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. Guglielmone,
Bishop Of Charleston, Defendants,

of which Lawrence E. Richter, Jr., David K. Haller, and Richter and Haller, LLC, are the
Respondents.

Designation of Matter To Be Included in the Record on Appeal

Appellant proposes to include in the record the following items, with exhibits:

ORDERS

2006-10-17 – Order designating cases complex and assigning to Judge Goodstein
2006-10-23 – orders dismissing Charleston cases without prejudice
2007-01-23 – order certifying classes and giving preliminary approval to settlement
2007-07-13 - order on waivers disclosures
2007-07-30 - order approving the class settlement
2007-08-31 – Order as to class settlement with letter agreement exhibit
2009-03-19 - Order of the Supreme Court to close class action in six months
2011-06-27 – order of Judge Young on limited collateral review
2013-12-17 - order of Judge Dickson on motion to enforce settlement
2016-10-26 - order of Judge Nicholson on limited collateral review
2017-08-11 - order of Judge Nicholson on lawyer defendants’ motions for summary judgment
2020 Order of the federal court remanding Jane Doe 304
2020-06-08 - Consent order staying Jane Doe 304 action
2021-04-19 - SC Supreme Court order declining original jurisdiction and appointing Judge Cole
2021-06-15 – SC Supreme Court order clarifying order assigning Judge Cole
2021-09-10 – SC Supreme Court order clarifying order clarifying scope of cases assigned to Judge Cole
2023-06-12 - ECF 35 - Federal Court Order remanding the 305/McDonald case
2025-03-26 – Judge McCoy order assigning 305/McDonald to Judge Cole
2025-09-10 - SC Supreme Court order appointing Judge McMaster
2025-11-06 - form 4 orders in each case on appeal (Chimento, Jane Doe 304, 305/McDonald)
2025-11-06 - Judgments in each case on appeal entered by clerk
2025-12-05 - Judge McMaster’s formal order in each case on appeal
2025-12-30 – Judge McMaster’s form 4 orders in each case denying Rule 59(e) motions

PLEADINGS

The 2005 class action and two individual case pleadings in Charleston County
2005-05-12 – Complaint in 2005-CP-10-2053
2005-08-13 – Complaint in 2005-CP-10-3293
2005-12-02 – Class Complaint in 2005-CP-10-4913 for John Doe 53
The 2006 class action pleadings in Dorchester County
2006-08-15 – Class Complaint in 2006-CP-18-1310
2006-08-15 – Class Complaint in 2006-CP-18-1311
2006-10-06 – Cloned class complaint in 2006-CP-18-1636 for John Doe 53
2006-10-06 – Motion to certify classes and approve settlement
2007-01-17 – Settlement and Arbitration Agreement
2007-01-17 – Motion to certify classes and for preliminary approval of settlement
2007-02-14 – Petition for award of fees and costs
2016-05-1 – Motion by John Doe 66 for fairness hearing

CHIMENTO case pleadings

2018-12-06 complaint

Motion to Dismiss by Richter, and Richter and Haller

Motion to Dismiss by Haller

Motion for Protective Order for Richter and Richter and Haller

2022-06-01 – Consolidated memorandum in opposition to motions, with exhibits

2025-11-17 – Rule 59(e) motion

2025-12-15 – Rule 50(e) motion

2026-01-26 - Notice of Appeal

Doe 304

2019-11-10 - initial complaint for Jane Doe 304

Diocese notice of removal

2020-02-27 – Second amended complaint

2020-03-18 - Haller motion to dismiss

2020-04-06 – Motion to Dismiss by Richter and Richter and Haller

2022-06-01 – Consolidated memorandum in opposition (with Chimento filing, not to be duplicated in the Record.

2020-06-08 - Order staying case

2025-11-17 - R59 motion

2025-12-15 – Rule 59 motion

2026-01-26 - Notice of Appeal

305/McDonald

2020-10 - Petition in the original jurisdiction of the Supreme Court

2020-12-01 - class counsel's return to the petition

2022-08-30 - 305/McDonald complaint, 22-CP-10-04031

2022-09-01 - Diocese Notice Removal

2022-09-15 - ECF 7 - Joint Motion by class counsel to Remand

2022-09-21 - ECF 8 – Motion to stay deadlines

2022-09-21 - ECF 11 - Notice of Appearance

2022-10-04 - ECF 15 - consent motion to substitute counsel

2022-10-04 - ECF 16 - joint reply to motion to remand

2022-10-07 - ECF 21 - mot dismiss (12-b-6)

2022-11-08 - ECF 28 - reply re motion to dismiss

2022-11-23 - ECF 31 - consent motion to substitute counsel

2023-09-01 – Motion to dismiss

2023-09-05 – Motion to dismiss

2025-10-02 – Opposition to Motions to Dismiss, with exhibits

2025-11-17 - R59 motion

20205-12-15 - R 59 motion

2026-01-26 - Notice of Appeal

TRANSCRIPTS

Transcripts from March 9, 2007 hearing in the class action

Transcripts from July 13, 2007 hearing in the class action

Transcript from April 10, 2014 hearing before Judge Nicholson

Transcript of hearing of October 7, 2025 before Judge McMaster

EXHIBITS

June 14, 2006 handwritten class settlement proposal
October 2006 motion for class approval
October 17, 2006 letter from Haller to Judge Jefferson
November 20, 2006 checks not disclosed in class action (page R000506)
January 2007 typed settlement proposal
January 2007 revised motion for class approval
2008-03-07 – First class action accounting
2008-04-28 - \$100,000 trust account check to Diocese
2009-03-18 – Second class action accounting

s/ Gregg Meyers

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Attorney for Appellant

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Certificate of Counsel

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Pursuant to SCACR 209(c), counsel certifies that the Designation contains no matter which is irrelevant to the appeal.

s/ Gregg Meyers

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