

85718

The State of South Carolina  
In The Court of Appeals

Appeal from Charleston County  
Hon. J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2010CP1005520

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

RECEIVED  
JAN 22 2018  
SC Court of Appeals

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

MOTION TO REINSTATE APPEAL

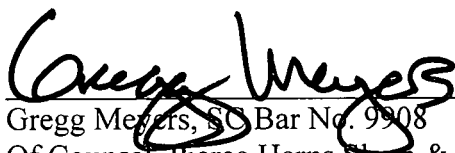
The Court dismissed this appeal by Order of January 12, 2018 for failing to serve the initial brief and designation of matter as required by SCACR 208 and 209. The court's order referred to a letter of December 8, of which counsel was unaware.

No brief has been submitted only because no transcript has been received from the court reporter. The transcript was ordered when the appeal was noticed, as reflected in the attached letter of September 25, 2017.

We were responsive to the court only for lack of awareness of the December 8, 2017 letter. That was inadvertent.

We ask that the Court reinstate the Appeal.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregg Meyers". The signature is written in a cursive style and is positioned above a horizontal line.

Gregg Meyers, SC Bar No. 9908  
Of Counsel, Pierce Hems Sloan & Wilson LLC  
321 East Bay Street  
Charleston SC 29401  
843-722-7733, 843-722-7732 facsimile  
greggmeyers@phswlaw.com

# PIERCE, HERNS, SLOAN & WILSON, LLC

ATTORNEYS AND COUNSELORS AT LAW

THE BLAKE HOUSE • 321 EAST BAY STREET  
CHARLESTON, SOUTH CAROLINA 29401

POST OFFICE BOX 22437  
CHARLESTON, SOUTH CAROLINA 29413

(843) 722-7733

(843) 722-7732 FAX

[www.phswlaw.com](http://www.phswlaw.com)

M. TODD RAINSFORD  
CHRISTINA L. PERRIN  
BENJAMIN C. SMOOT, II ☐  
J. MORGAN FORRESTER  
T.A.C. HARGROVE II

☐ MEMBER SC & VA BAR

CARL E. PIERCE, II  
LOUIS P. HERNS  
ALLAN P. SLOAN, III \*◆  
JOSEPH C. WILSON, IV †  
JAMES G. KENNEDY  
WILLIAM P. EARLY ●  
SONALY K. HENDRICKS †  
GREGG MEYERS ▲

\* MEMBER SC & FL BAR  
◆ CERTIFIED SC CIRCUIT  
COURT MEDIATOR  
† MEMBER SC, FL & GA BAR  
‡ SPECIAL COUNSEL  
▲ OF COUNSEL  
● MEMBER SC & TN BAR

Email: [greggmeyer@phswlaw.com](mailto:greggmeyer@phswlaw.com)

Direct Phone: (843)725-7750

September 25, 2017

Dixie C. Eubank, RPR  
Circuit Court Reporter  
PO Box 2194  
Murrells Inlet, SC 29576

Re: Consolidated cases

2010-CP-10-5520,	2010-CP-10-7233,
2012 CP-10-5559,	2013-CP-10-3733,
2013-CP-10-4175,	2103-CP-10-4176,
2015-CP-10-5486, and	2016-CP-10-1632,

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

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.

Dear Ms. Eubank:

The South Carolina Supreme Court website has you listed as the reporter for the proceedings before Judge Nicholson on July 20, 2017 in these consolidated cases, and that listing fits with my recollection. We argued a series of motions.

I may need a transcript of the proceedings from that day, so this is to request the transcript

of those proceedings.

Of course I will be responsible for the fees associated with that transcript. Please consider this my order for the transcript.

Thank you very much.

Sincerely,

A handwritten signature in black ink that reads "Gregg Meyers". The signature is written in a cursive style with a large, looping initial "G" and a distinct "M" at the end.

Gregg Meyers

The State of South Carolina  
In The Court of Appeals

---

Appeal from Charleston County  
Hon. J.C. Nicholson, Jr., Circuit Court Judge

---

Case No. 2010CP1005520

---

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

RECEIVED  
JAN 22 2018  
SC Court of Appeals

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

---

Proof of Service

---

I hereby affirm that I have served upon counsel for the defendant/respondent a copy of

Motion to Reinstate Appeal

By placing a copy of the documents in the United States mail, first-class postage pre-paid,  
addressed to:

Richard S. Dukes, Jr.  
Brian Kern  
Turner Padget  
40 Calhoun Street, Suite 200  
PO Box 22129  
Charleston SC 29413-2129

James L. Bruner  
Ben Bruner  
Bruner Powell Wall & Mullins, LLC  
PO Box 61110

Columbia SC 29260-1110

Susan Taylor Wall  
Hal Frampton  
Gordon & Rees  
170 Meeting Street, Suite 110  
Charleston SC 29401

Done January 18, 2018.

A handwritten signature in black ink that reads "Gregg Meyers". The signature is written in a cursive style with a large, stylized "G" and "M".

Gregg Meyers  
Of Counsel  
Pierce Hems Sloan & Wilson LLC  
321 East Bay Street  
Charleston SC 29401  
843-722-7733, 843-722-7732 facsimile  
[greggmeyers@phswlaw.com](mailto:greggmeyers@phswlaw.com)

PIERCE, HERNS, SLOAN & WILSON, LLC

ATTORNEYS AND COUNSELORS AT LAW

THE BLAKE HOUSE • 321 EAST BAY STREET  
CHARLESTON, SOUTH CAROLINA 29401

POST OFFICE BOX 22437  
CHARLESTON, SOUTH CAROLINA 29413

(843) 722-7733  
(843) 722-7732 FAX  
www.phswlaw.com

Direct phone: (843)725-7750  
Email: greggmeyers@phswlaw.com

M. TODD RAINSFORD  
CHRISTINA L. PERRIN  
BENJAMIN C. SMOOT, II  
J. MORGAN FORRESTER  
T.A.C. HARGROVE II

MEMBER SC & VA BAR

CARL E. PIERCE, II  
LOUIS P. HERNS  
ALLAN P. SLOAN, III  
JOSEPH C. WILSON, IV  
JAMES G. KENNEDY  
WILLIAM P. EARLY  
SONALY K. HENDRICKS  
GREGG MEYERS  
MEMBER SC & FL BAR  
CERTIFIED SC CIRCUIT COURT MEDIATOR  
MEMBER SC, FL & GA BAR  
SPECIAL COUNSEL OF COUNSEL  
MEMBER SC & TN BAR

January 18, 2018

RECEIVED  
JAN 22 2018  
SC Court of Appeals

Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211


Re: 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 Corporate Sole, Robert Guliemone, The Bishop of Charleston, in his official capacity; Rev. Monsignor Martin Laughlin, former Administrator of the Diocese of Charleston, in his 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  
Case no. 2010-CP-10-05520

Dear Honorable Kitchings:

Enclosed please find an original and six copies of Plaintiff's Motion to Reinstate Appeal with Certificate of Service in regards to the above-referenced matter. I have also included the required \$25.00 motion fee.

With kind regards,

Sincerely,

  
Gregg Meyers

Enclosure:

Clerk of court mailing

cc: Richard S. Dukes, Jr. (w/ encl.)

Honorable Jenny Abbott Kitchings  
January 18, 2018  
Page 2

Brian Kern (w/ encl.  
James L. Bruner (w/ encl.)  
Susan Taylor Wall (w/encl.)