

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
OCT 09 2018
SC Court of Appeals

APPEAL FROM CHARLETON COUNTY
Court of Common Pleas

J. C. Nicholson, Circuit Court Judge

Appellate Case No.: 2017-001996

Consolidated Case Nos.: 2010-CP-10-5520; 2010-CP-10-7233;
2012-CP-10-5559; 2013-CP-10-3733; 2013-CP-10-4175; 2013-CP-10-4176;
2015-CP-10-5486; 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.....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.

**DIocese RESPONDENTS' DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

The Diocese Respondents propose that the following be included in the Record on
Appeal in addition to the documents previously designated by Appellant:

1. Diocese Omnibus Motion for Summary Judgment on *Res Judicata*
2. Diocese Omnibus Motion for Summary Judgment as to Civil Conspiracy

3. Diocese Supplemental Memorandum of Law in Support of Motion for Summary Judgment on Conspiracy Claims
4. Diocese Omnibus Motion for Summary Judgment as to Loss of Consortium
5. Diocese Omnibus Motion for Summary Judgment as to Statute of Limitations
6. Diocese Omnibus Motion for Summary Judgment as to Unfair Trade Practices
7. Diocese Omnibus Motion for Summary Judgment as to Vicarious Liability / Lack of Notice
8. Diocese Omnibus Motion for Summary Judgment as to Deceased Plaintiffs
9. Diocese Motion for Summary Judgment on Aiding and Abetting Claim John Doe 193 v. Bishop of Charleston only
10. Transcript of Hearing, April 16, 2015
11. Diocese Memo in Support of Motion to Alter or Amend Order on Limited Collateral Review, March 17, 2017
12. Order of Judge J.C. Nicholson, May 4, 2017, Amended Order on Limited Collateral Review
13. Transcript of Hearing, April 24, 2017
14. Order of Judge Roger Young, June 17, 2011, *John Doe 2 and Jane Doe 4* matter
15. Transcript of Hearing, July 20, 2017
16. *John Doe 193* Order Changing Venue, June 24, 2013
17. Transcript of Hearing, July 20, 2017
18. Order of Judge J.C. Nicholson, August 11, 2017
19. Transcript of Hearing, June 28, 2017

20. Order of Judge Goodstein, January 19, 2007, Granting Preliminary Approval to Class Action Settlement
21. Notice of Proposed Class Settlement
22. Transcript of Hearing before Judge Diane Goodstein, March 9, 2007
23. Transcript of Hearing before Judge Diane Goodstein, July 13, 2007
24. Order of Judge Goodstein Approving Class Action Settlement July 30, 2017
25. Objections to Class Action Settlement
26. Class Action Objectors' Rule 59(e) Motion to Alter or Amend, August 7, 2007
27. Transcript of Hearing before Judge Goodstein August 9, 2007
28. Order of Judge Goodstein, August 31, 2007
29. Order of Judge Nicholson, September 9, 2010

TURNER, PADGET, GRAHAM & LANEY, P.A.



Richard S. Dukes, Jr. (SC Bar No.: 16563)
40 Calhoun Street, Suite 200 (29401)
Post Office Box 22129
Charleston, South Carolina 29413-2129
Telephone: 843-576-2810
Email: rdukes@turnerpadget.com

ATTORNEYS FOR DIOCESE RESPONDENTS

October 9, 2018

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
OCT 09 2018
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Circuit Court Judge

Appellate Case No.: 2017-001996

Consolidated Case Nos.: 2010-CP-10-5520; 2010-CP-10-7233;
2012-CP-10-5559; 2013-CP-10-3733; 2013-CP-10-4175; 2013-CP-10-4176;
2015-CP-10-5486; 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
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,

PROOF OF SERVICE

The undersigned, an attorney in this matter for the Diocese Respondents, certifies that I
have this **9th day of October, 2018**, served a copy of the **Initial Brief of Diocese Respondents
and Designation of Matter to be Included in Record on Appeal** upon all counsel of record by


causing them to be deposited in the United States mail with sufficient postage attached,
addressed to:

Gregg E. Meyers
Pierce, Sloan, Wilson, Kennedy & Early, LLC
321 East Bay Street
Charleston, SC 29401
Attorneys for Appellants

Susan Taylor Wall
Henry Wilkins Frampton, IV
Gordon Rees Scully Mansukhani, LLP
40 Calhoun Street, Suite 350
Charleston, SC 29401
Attorneys for Respondent David K. Haller

Benjamin C. Bruner
Bruner, Powell, Wall & Mullins, LLC
1735 St. Julian Place, Suite 200 (29204)
Post Office Box 61110
Columbia, SC 29260-1110
*Attorneys for Respondents Lawrence E. Richter, Jr.
and Richter & Haller, LLC*

TURNER, PADGET, GRAHAM & LANEY, P.A.



Richard S. Dukes, Jr. (SC Bar No.: 16563)
40 Calhoun Street, Suite 200 (29401)
Post Office Box 22129
Charleston, South Carolina 29413-2129
Telephone: 843-576-2810
Email: rdukes@turnerpadget.com

ATTORNEYS FOR DIOCESE RESPONDENTS

October 9, 2018