

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

RECEIVED

OCT 10 2018

SC Court of Appeals

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.

**RESPONDENTS LAWRENCE E. RICHTER, JR.; DAVID J. HALLER;
AND RICHTER AND HALLER, LLC'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

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. Complaint, 2005-CP-10-02053, filed May 12, 2005;
2. Complaint, 2005-CP-10-03293, filed August 12, 2005;
3. Complaint, 2005-CP-10-04913, filed December 2, 2005;
4. Complaint, 2006-CP-18-01310, filed August 15, 2006;

5. Complaint, 2006-CP-18-01311, filed August 15, 2006;
6. Complaint, 2006-CP-18-01636, filed October 6, 2006;
7. Complaint, 2010-CP-10-05520, filed July 9, 2010;
8. Complaint, 2010-CP-10-07233, filed September 3, 2010;
9. Complaint, 2012-CP-10-05559, filed August 23, 2012;
10. Complaint, 2013-CP-23-01843, filed April 2, 2013;
11. Complaint, 2013-CP-10-04175, filed July 17, 2013;
12. Complaint, 2013-CP-10-04176, filed July 17, 2013;
13. Complaint, 2015-CP-10-05486, filed October 12, 2015;
14. Complaint, 2016-CP-10-01632, filed March 31, 2016;
15. Consent Order of Dismissal Without Prejudice, 2005-CP-10-04913, filed October 23, 2006;
16. Order, 2006-CP-18-01310, -01311, -01636, dated January 19, 2007 with attachments;
17. Order Approving Settlement, 2006-CP-18-01310, -01311, -01636, filed July 30, 2007 with attachments;
18. Order [of the Supreme Court denying petition to file in original jurisdiction], March 19, 2009;
19. Opinion No. 26984 [of the Supreme Court], filed June 13, 2011;
20. Order, 2006-CP-18-01310, -01311, -01636, filed August 31, 2007 with attachment;
21. Order, 2010-CP-10-05520, filed June 27, 2011;
22. Order denying motions for protective orders, 2010-CP-10-05520, July 11, 2011;
23. Order Denying Defendants Lawrence E. Richter, Jr. and Richter & Haller, LLC's Motions to Reconsider, Alter, or Amend, 2010-CP-10-05520, filed July 13, 2011;
24. Amended Consolidated Consent Scheduling Order, 2010-CP-10-05520, 2010-CP-10-07233, filed July 17, 2012;
25. Consent Order Changing Venue to Charleston County, 2013-CP-23-01843, filed June 20, 2013 in Greenville County, 2013-CP-10-03733, filed June 24, 2013 in Charleston County;
26. Form 4 Order, 2013-CP-10-03733, filed January 21, 2014;
27. Order, 2013-CP-10-03733, filed January 22, 2014;
28. Form 4 Order, 2013-CP-10-03733, filed March 27, 2014;
29. Amended Consolidated Consent Scheduling Order, 2010-CP-10-05520, 2010-CP-10-07233, 2012-CP-10-05559, 2013-CP-10-03733, 2013-CP-10-04175, 2013-CP-10-04176, filed July 15, 2014;
30. Order of Supreme Court, June 12, 2015, assigning C/A Nos. 2006-CP-18-01310, -01311, -01636 to Judge Nicholson;
31. Order Bifurcating Trials, filed October 26, 2016;
32. Order on Limited Collateral Review, filed October 26, 2016;

33. *Sue Sponte* Scheduling Order, 2009-CP-10-06694, 2009-CP-10-08054, 2009-CP-10-08055, 2009-CP-10-08056, 2010-CP-10-05520, 2012-CP-10-05559, 2013-CP-10-03733, 2013-CP-10-04175, 2013-CP-10-04176, 2014-CP-10-02130, 2015-CP-10-03288, 2015-CP-10-05486, 2016-CP-10-01632, filed June 2, 2017;
34. Amended Order on Limited Collateral Review, filed May 4, 2017;
35. Order Granting Diocese Defendants' Motion for Summary Judgment, 2010-CP-10-05520, filed August 10, 2017;
36. Order Granting Diocese Defendants' Motion for Summary Judgment, 2012-CP-10-05559, filed August 10, 2017;
37. Order Granting Diocese Defendants' Motion for Summary Judgment, 2013-CP-10-03733, filed August 10, 2017;
38. Order Granting Diocese Defendants' Motion for Summary Judgment, 2016-CP-10-01632, filed August 10, 2017;
39. Order on Lawyer Defendants' Motions for Summary Judgment, filed August 11, 2017;
40. Order of the Court of Appeals, 2017-001092, filed August 15, 2017 in Charleston County;
41. Order Designating Case Complex, 2006-CP-18-01310, -01311, -01636, filed October 17, 2006;
42. Motion to Certify Classes and for Preliminary Approval of Class Settlement, 2006-CP-18-01310, -01311, and -01636, filed October 6, 2006;
43. Motion to Certify Classes and for Preliminary Approval of Class Settlement with attachments, 2006-CP-18-01310, -01311, and -01636, filed January 17, 2007;
44. Memorandum in Support of Motion to Alter or Amend, submitted by Gregg Meyers, 2006-CP-18-01310, -01311, and -01636, filed August 22, 2007;
45. Richter Defendants' Motion for Limited Collateral Review and for Summary Judgment, 2010-CP-10-05520, 2010-CP-10-07233, 2012-CP-10-05559, 2013-CP-10-03733, 2013-CP-10-04175, 2013-CP-10-04176, filed March 2, 2015;
46. Lawyer Defendants' Memorandum in Support of Motion for Limited Collateral Review of Class Action Settlement and for Summary Judgment with 123 pages of attachments, 2010-CP-10-05520, 2010-CP-10-07233, 2012-CP-10-05559; 2013-CP-10-03733, 2013-CP-10-04175, 2013-CP-10-04176, filed April 13, 2015;
47. Diocesan Defendants' Motion for Partial Summary Judgment, 2010-CP-10-05520, 2010-CP-10-07233, 2012-CP-10-05559, 2013-CP-10-03733, 2013-CP-10-04175, 2013-CP-10-04176, filed April 15, 2015;
48. Diocese Defendants' Omnibus Motion for Summary Judgment, 2009-CP-10-06694, 2009-CP-10-08054, 2009-CP-10-08055, 2009-CP-10-08056, 2010-CP-10-05520, 2012-CP-10-05559, 2013-CP-10-03733, 2014-CP-10-02130, 2016-CP-10-01632, filed June 26, 2017;
49. Lawyer Defendants' Omnibus Motion for Summary Judgment with Exhibits A through G, 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, filed July 11, 2017;
50. Lawyer Defendants' Omnibus Motion for Summary Judgment as to Claims of Jane Doe 4 on Notice with Exhibit A, 2010-CP-10-05520, filed July 11, 2017;
 51. SCRCP 59(e) Motion to Alter or Amend, 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, filed August 22, 2017;
 52. Stipulation of Dismissal, 2010-CP-10-07233, filed May 22, 2017;
 53. Stipulation of Dismissal, 2013-CP-10-04175, filed July 6, 2017;
 54. Stipulation of Dismissal, 2013-CP-10-04176, filed July 6, 2017;
 55. Stipulation of Dismissal, 2015-CP-10-05486;
 56. Objections to Proposed Order in 2006-CP-18-01310, -01311, and -01636, filed August 1, 2007;
 57. Affidavit of John P. Freeman with two attachments, 2006-CP-18-01310, -01311, and -01636, filed February 14, 2007;
 58. Letter from Richter to Shahid, October 5, 2007;
 59. Letter to Court with final settlement accounting (8 pages), 2006-CP-18-01310, -01311, -01636, dated March 10, 2008;
 60. Complaint in C/A No. 2015-CP-10-3287;
 61. Stipulation of Dismissal in C/A No. 2015-CP-10-3287;
 62. Complaint in C/A No. 2015-CP-10-3288;
 63. Stipulation of Dismissal in C/A No. 2015-CP-10-3288;
 64. Order filed September 8, 2010 in C/A No. 2009-CP-10-7751;
 65. Transcript of Record, March 9, 2007, in C/A Nos. 2006-CP-18-01310, -01311, -01636;
 66. Transcript of Record, July 13, 2007, in C/A Nos. 2006-CP-18-01310, -01311, -01636;
 67. Transcript of Record, August 9, 2007, in C/A Nos. 2006-CP-18-01310, -01311, -01636;
 68. Transcript of Record, June 28, 2017, in C/A Nos. 2009-CP-10-06694, 2009-CP-10-08054, 2009-CP-10-08055, 2009-CP-10-08056, 2010-CP-10-05520, 2012-CP-10-05559, 2013-CP-10-03733, 2014-CP-10-02130, 2016-CP-10-01632;
 69. Transcript of Record, July 20, 2017, in C/A Nos. 2010-CP-10-05520, 2010-CP-10-07233, 2012-CP-10-05559, 2013-CP-10-03733, 2013-CP-10-04175, 2013-CP-10-04175, 2013-CP-10-04176, 2015-CP-10-05486, 2016-CP-10-01632.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

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at permission

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October 10, 2018
Columbia, South Carolina

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Respondents.

PROOF OF SERVICE

I, Bridget S. Steele, an employee of Bruner, Powell, Wall & Mullins, LLC, attorneys for Respondents Lawrence E. Richter, Jr., Richter & Haller, LLC, do hereby certify that I have served a copy of the attached *Initial Joint Brief of Respondents Lawrence E. Richter, Jr., David J. Haller, and Richter And Haller, LLC* and the *Respondents Lawrence E. Richter, Jr.; David J. Haller; and Richter And Haller, LLC's Designation of Matter To Be Included In The Record On Appeal* by e-mail and by depositing a copy of it in the U.S. Mail, postage prepaid, on October 10, 2018, addressed to the following:

Gregg E. Meyers, Esquire
Pierce Hems Sloan & Wilson LLC
321 East Bay Street
Charleston, SC 29401
Attorney for Appellants

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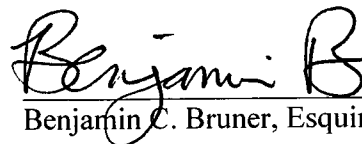
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CERTIFICATE OF COUNSEL

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, Esquire