

The State of South Carolina
In The Court of Appeals

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

Appellate Case No. 2017-001996

RECEIVED

OCT 24 2018

SC Court of Appeals

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

Supplemental Designation Of Matter
to be Included In the Record

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

Attorney for Appellant

Supplemental Designation of Matter to Be Included In the Record

Appellants originally proposed to include in the record:

1. Complaint in 05-CP-10-4913
2. Plaintiff's 2017 motion to alter or amend – 8-22-17
3. Letter to Judge Nicholson serving R59 motion
4. Plaintiffs' Opposition to Diocese Motion for Summary Judgment
5. Plaintiff's Opposition to Lawyer defendants Omnibus Motion for Summary Judgment
6. 8-10-17 order as to Diocese defendants
7. 8-11-17 order as to Lawyer defendants
8. Order assigning class action to Nicholson
9. Plaintiff's Opposition to Motion for summary judgment as to Doe 193 filed 7-18-17
10. Plaintiff's Opposition to the motions for summary judgment in other cases filed 7-18-17
11. Complaint in 06-cp-18-1310,
12. Complaint in 06-cp-18-1311
13. 9-6-06 – Diocese acceptance of service in 1310
14. 9-20-06 letter from Class Counsel to Judge Goodstein
15. Complaint in 2006-CP-27-00143
16. Motion for Summary Judgment in 2006-CP-27-00143, filed November 13, 2009
17. 10-6-06 version of Doe 53 class complaint.
18. 10-6-06 motion for class and settlement approval.
19. Class Counsel letter to Judge Jefferson of October 17, 2006;
20. Orders of October 23, 2006 dismissing cases 05-cp-10-3293, 05-CP-10-2053, and 05-Cp-10-4913 without prejudice.
21. S.C. Supreme Court Order of July 26, 2006.
22. April 10, 2014 hearing transcript pp 1-43.
23. January 17 2007 settlement agreement and motion for class approval
24. July 13, 2007 hearing transcript
25. 7-30-2007 order approving settlement
26. August 7, 2007 R59 motion.
27. Complaint in Doe 10 and affidavit of Michael Virzi.
28. Complaint in Doe 193
29. Complaints in Does 2, 4, 11, 194, 194f, 245, 245f, 297
30. Memorandum opposing summary judgment for Doe 193
31. June 27, 2011 Order of Judge Young
32. Order of Judge Nicholson of May 3, 2017
33. Plaintiff's supplemental memorandum of 7-21-17

Appellants now supplement that designation with:

34. Order of January 19, 2007 certifying classes.
35. Recusal order of January 24, 2013

The State of South Carolina
In The Court of Appeals

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

Appellate Case No. 2017-001996

RECEIVED
OCT 24 2018
SC Court of Appeals

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

Proof of Service

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

Appellant's Reply Brief and
Supplemental Designation of Matter to be Included In the Record

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

Richard S. Dukes, Jr.
Turner Padget Graham & Laney, P.A.
40 Calhoun Street, Suite 200
PO Box 22129
Charleston SC 29413-2129

Ben Bruner
Chelsea Clark

Bruner Powell Wall & Mullins, LLC
PO Box 61110
Columbia SC 29260-1110

Susan Taylor Wall
Hal Frampton
Gordon & Rees, LLP
40 Calhoun Street, Suite 350
Charleston SC 29401

Done October 20, 2018

A handwritten signature in black ink that reads "Gregg Meyers". The signature is written in a cursive, flowing style with a large, prominent "G" at the beginning.

Gregg Meyers
Of Counsel
Pierce Sloan LLC
321 East Bay Street
Charleston SC 29401
843-722-7733, 843-722-7732 facsimile
greggmeyers@piercesloan.com

PIERCE | SLOAN

WILSON KENNEDY & EARLY LLC

ATTORNEYS AND COUNSELORS AT LAW

THE BLAKE-GRIMKÉ 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.piercesloan.com

Email: greggmeyers@piercesloan.com
Phone: (843)725-7750

M. TODD RAINSFORD
BENJAMIN C. SMOOT, II
J. MORGAN FORRESTER
CARSON R. PARKER
KATIE L. MILLER
DANIEL F. LYNCH, IV

MEMBER SC & VA BAR

CARL E. PIERCE, II
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

October 22, 2018

Via First Class Mail:

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

Re: Appellate case no. 2017-001996,
Doe 2 et al v. Bishop of Charleston et al.

RECEIVED
OCT 24 2018
SC Court of Appeals

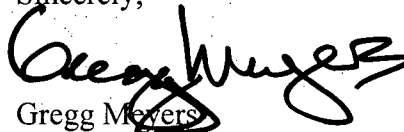
Dear Ms. Kitchings:

Pursuant to SCACR 208 and 209, enclosed please find a copy of:

A proof of service,
A reply brief of appellant, and
Appellant's supplemental designation of matter to be included in the record.

Please file these documents with the court. Thank you very much.

Sincerely,


Gregg Meyers

Enclosures:

Proof of Service
Initial Brief
Designation

cc: counsel of record

PIERCE | SLOAN

WILSON KENNEDY & EARLY LLC

ATTORNEYS AND COUNSELORS AT LAW

THE BLAKE-GRIMKÉ HOUSE | 321 EAST BAY STREET

POST OFFICE BOX 22437

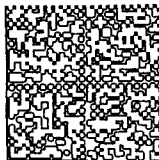
CHARLESTON, SOUTH CAROLINA 29413

RECEIVED

OCT 24 2018

SC Court of Appeals

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



UNITED STATES POSTAGE



PITNEY BOWES

02 1P

\$ 001.84⁰

0000869317

OCT 22 2018

MAILED FROM ZIP CODE 29401