

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2020-000804

RECEIVED

Sep 10 2020

SC Court of Appeals

John Doe,.....Appellant,

v.

Bishop of Charleston, a Corporation Sole, and
The Bishop of the Diocese of Charleston, in his
official capacity,.....Respondents.

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

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

1. Defendants' Motion for Partial Summary Judgment on behalf of "the Bishop of the Diocese of Charleston, in his official capacity."
2. Defendants' Supplemental Brief Regarding Religious Liberty Issues.
3. Defendants' Supplemental Authorities in Support of Motion for Partial Summary Judgment.
4. Scheduling Order dated June 14, 2019.

5. Motion for Summary Judgment based upon the Statute of Limitations/ Lack of Admissible Evidence of Repressed Memory Syndrome
6. Defendants' Motion for Summary Judgment based upon the *Res Judicata* effect of the class action settlement and judgment.
7. Defendants' Affidavits in Support of Summary Judgment
 - a. Affidavit of Peter Shahid
 - b. Affidavit of John Barker
 - c. Affidavit of Harold Brooks
8. Defendants' Supplemental Brief on Inadmissibility of Testimony Pursuant to Rule 702, SCRE.
9. Defendants' Supplemental / Reply Affidavits in Support of Motions for Summary Judgment
 - a. Affidavit of Dr. Elizabeth Loftus
 - b. Affidavit of Dr. James Hudson
 - c. Affidavit of Dr. Monica Applewhite
 - d. Affidavit of Dr. Janine Shelby
10. Defendants' Motion for Summary Judgment on Plaintiff's Negligence, Negligent Retention, Negligent Supervision, Outrage/Intentional Infliction Claims.
11. Defendants' Motion for Summary Judgment on Plaintiffs' Fraud-Based and Contract Claims.
12. Defendants' Motion for Summary Judgment on Plaintiffs' Breach of Fiduciary Duty Claim.
13. Defendants' Motion for Summary Judgment on Plaintiff's Conspiracy Claim.

14. Transcript of Hearing, December 14, 2018.

15. Transcript of Hearing, July 17, 2019.

Counsel certifies that this designation contains no matter that is irrelevant to this appeal.

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

s/Richard S. Dukes, Jr.

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ATTORNEYS FOR DIOCESE RESPONDENTS

September 10, 2020

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2020-000804

John Doe, Appellant,

v.

The Diocese of Charleston, a Corporation Sole, and
the Bishop of the Diocese of Charleston, in his official capacity, Respondents.

PROOF OF SERVICE

The undersigned, an attorney in this matter of the Appellant certifies that I have this 10th **day of September, 2020**, served copies of the **Initial Brief of Respondents, Diocese Designation of Matter** upon all counsel for the Respondents (listed below) by causing them to be deposited in the United States mail with sufficient postage attached, addressed to:

Larry E. Richter, Jr.
The Richter Firm, LLC
622 Johnnie Dodds Boulevard
Mount Pleasant, SC 29464

Signature page to follow

TURNER PADGET GRAHAM & LANEY, P.A.

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September 10, 2020