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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2019-001470

John Doe,.....Respondent,

v.

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

and

Richard Roe,.....Respondent,

v.

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

Of whom the Bishop of the Diocese of Charleston,
in his official capacity is the.....Appellant.

Respondents' Amended Motion for Fees

On the 24th day of July, 2019 the Court of Common Pleas for the County of Charleston,
South Carolina issued an Order by the Honorable Bentley Price granting Respondents' Motion to

Compel discovery compliance by the Petitioners. Thereafter, counsel for the Petitioners moved for reconsideration by the trial court as to these Orders and such reconsideration was denied.

Thereafter the Petitioners herein appealed to the Court of Appeals, which on the 2nd day of December, 2019 dismissed the appeals as being interlocutory, relating to a discovery matter. Petitioners again moved for reconsideration, this time in the Court of Appeals, and such reconsideration was denied.

Thereafter, the Petitioners petitioned the South Carolina Supreme Court for a writ of certiorari, which petition was likewise denied and the case was sent back to the trial court in Charleston, This latter action was dated January 22, 2021.

Therefore, the involved matters did not advance on the trial docket at all, but were rather delayed during the pendency of Petitioners' improper appellate process for several months.

The matter having been now resolved adversely to the parties seeking appellate relief, and a substantial impediment to the litigation having been endured by the Respondents, such Plaintiffs below now seek the award of attorneys fees in the maximum allowable amount (Doe case \$2,500.00, Roe case \$2,500.00, total of \$5,000.00).

Respondents herein verily believes the appellate relief sought was for dilatory, delay, and not legitimate and allowable purpose. We so move.

THE RICHTER FIRM, LLC

s/Lawrence E. Richter, Jr.
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ATTORNEYS FOR RESPONDENTS

Mt. Pleasant, South Carolina
March 4, 2021

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Of whom the Bishop of the Diocese of Charleston,
in his official capacity is the.....Appellant.

PROOF OF SERVICE

The undersigned, an attorney in this matter of the Respondents, certifies that I have this
4th day of March, 2021, electronically served a copy of Respondents' Amended Motion for Fees

upon all counsel for the Appellant (listed below) by using the following AIS email addresses:

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s/Lawrence E. Richter, Jr.
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Attorneys for Respondents

March 4, 2021



THE RICHTER FIRM, LLC
ATTORNEYS AND COUNSELORS AT LAW

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SC Court of Appeals

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Anna E. Richter
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March 4, 2021

V. Claire Allen, Clerk of Court
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

In Re: Richard Roe and John Doe v. Bishop of Charleston
Appellate Case No. 2019-001470

Dear Ms. Allen:

Today we electronically filed and served Respondents' Amended Motion for Fees in the above referenced matter, copy enclosed for your ease of reference. Also enclosed please find this firm's check #8776 in the amount of \$50.00 representing the requisite motion filing fee. Should you require anything further please do not hesitate to let us know.

Thanking you for your kind assistance, and with best regards, I am

Very truly yours,

Larkin W. Hegler
Administrative Assistant

/lwh
Enclosure

cc: Richard S. Dukes, Jr.
R. Hawthorne Barrett

Larkin W. Hegler

From: Larkin W. Hegler
Sent: Thursday, March 4, 2021 5:00 PM
To: ctappfilings@sccourts.org
Cc: rdukes@turnerpadget.com; tbarrett@turnerpadget.com; 'Lawrence E. Richter, Jr.;; Anna Richter; Michelle Stith; kjones@turnerpadget.com
Subject: Richard Roe and John Doe v. Bishop of Charleston; Appellate Case No. 2019-001470
Attachments: Respondents' Amended Motion for Fees.pdf; Proof of Service - Respondents' Amended Motion for Fees.pdf

Dear Sir or Madam,

Attached for filing please find Respondents' Amended Motion for Fees, together with a Proof of Service, in the above referenced matter. The requisite filing fee will follow by U.S. Mail. Thank you for your assistance with this filing.

Best regards,

Larkin W. Hegler
Administrative Assistant
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843-849-6000
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Mount Pleasant, South Carolina 29464

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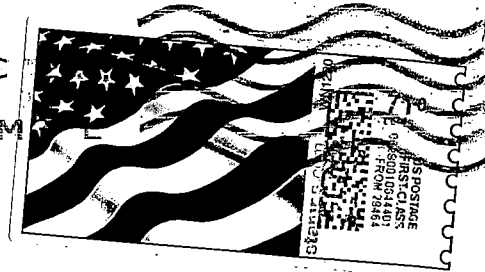
SC Court of Appeals

V. Claire Allen, Clerk of Court

The South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211



29211-162929

