

b. John Does 1-10, who are individuals who are consciously engaged in false advertising and trademark infringement together with Bishop Lawrence, but whose identity and numbers are presently unknown;

c. the religious organization under the direction and control of defendant Bishop Lawrence and holding itself out as an “Episcopal” “Diocese” and currently purporting to operate as a corporation using the name The Protestant Episcopal Church in the Diocese of South Carolina (“Lawrence Diocese”);

d. the Trustees of The Protestant Episcopal Church in the Diocese of South Carolina; and

e. the following parishes that are affiliated with the Lawrence Diocese, and which, upon information and belief, are South Carolina non-profit corporations:

- All Saints Protestant Episcopal Church, Inc.;
- Christ St. Paul’s Episcopal Church;
- Church of The Cross, Inc. and Church of the Cross Declaration of Trust;
- Church of The Holy Comforter;
- Church of the Redeemer;
- Holy Trinity Episcopal Church;
- Saint Luke’s Church, Hilton Head;
- St. Bartholomew’s Episcopal Church;
- St. David’s Church;
- St. James’ Church, James Island, S.C.;
- St. Paul’s Episcopal Church of Bennettsville, Inc.;
- The Church of St. Luke and St. Paul, Radcliffeboro;
- The Church of Our Saviour of the Diocese of South Carolina;
- The Church of the Epiphany (Episcopal);
- The Church of the Good Shepherd, Charleston, SC;
- The Church of The Holy Cross;
- The Church of The Resurrection, Surfside;
- The Protestant Episcopal Church of The Parish of Saint Philip, in Charleston, in the State of South Carolina;
- The Protestant Episcopal Church, The Parish of Saint Michael, in Charleston, in the State of South Carolina and St. Michael’s Church Declaration of Trust;
- The Vestry and Church Wardens of St. Jude’s Church of Walterboro;
- The Vestry and Church Wardens of The Church of The Parish of St. Helena and The Parish Church of St. Helena Trust;

The Vestry and Church Wardens of The Parish of St. Matthew;
The Vestry and Wardens of St. Paul's Church, Summerville;
Trinity Church of Myrtle Beach;
Trinity Episcopal Church;
Trinity Episcopal Church, Pinopolis;
Vestry and Church Wardens of the Episcopal Church of The Parish of Christ Church;
Vestry and Church Wardens of The Episcopal Church of the Parish of St. John's, Charleston County.

Christ the King, Waccamaw;
St. Matthews Church;
St. Andrews Church-Mt. Pleasant Land Trust;
St. John's Episcopal Church of Florence, S.C.;
St. Matthias Episcopal Church, Inc.;
St. Paul's Episcopal Church of Conway;
The Vestry and Church Wardens of The Episcopal Church of The Parish of Prince George Winyah;
The Vestries and Churchwardens of The Parish of St. Andrews

Holy Apostles, Barnwell
St. James Anglican, Blackville
Berkeley County Strawberry Chapel
St. Alban's Chapel, The Citadel
St. Andrew's Mission
St. John's Episcopal, Charleston
St. Barnabas, Dillon
Christ Church, Florence
St. James, Goose Creek
Holy Trinity, Grahamville
Ascension, Hagood
Church of the Advent, Marion
The Well by the Sea, Myrtle Beach
Church of the Resurrection, Myrtle Beach
Grace Parish, North Myrtle Beach
St. Paul's, Orangeburg
St. Timothy's, Cane Bay
Atonement, Walterboro

2. Claims under South Carolina law governing trustees seeking replacement of trustees for breach of fiduciary duty against:

a. the Trustees of The Protestant Episcopal Church in the Diocese of South Carolina;

b. the following parishes that are affiliated with the Lawrence Diocese, and which, upon information and belief, are South Carolina non-profit corporations:

All Saints Protestant Episcopal Church, Inc.;
Christ St. Paul's Episcopal Church;
Church of The Cross, Inc. and Church of the Cross Declaration of Trust;
Church of The Holy Comforter;
Church of the Redeemer;
Holy Trinity Episcopal Church;
Saint Luke's Church, Hilton Head;
St. Bartholomew's Episcopal Church;
St. David's Church;
St. James' Church, James Island, S.C.;
St. Paul's Episcopal Church of Bennettsville, Inc.;
The Church of St. Luke and St. Paul, Radcliffeboro;
The Church of Our Saviour of the Diocese of South Carolina;
The Church of the Epiphany (Episcopal);
The Church of the Good Shepherd, Charleston, SC;
The Church of The Holy Cross;
The Church of The Resurrection, Surfside;
The Protestant Episcopal Church of The Parish of Saint Philip, in Charleston, in the State of South Carolina;
The Protestant Episcopal Church, The Parish of Saint Michael, in Charleston, in the State of South Carolina and St. Michael's Church Declaration of Trust;
The Vestry and Church Wardens of St. Jude's Church of Walterboro;
The Vestry and Church Wardens of The Church of The Parish of St. Helena and The Parish Church of St. Helena Trust;
The Vestry and Church Wardens of The Parish of St. Matthew;
The Vestry and Wardens of St. Paul's Church, Summerville;
Trinity Church of Myrtle Beach;
Trinity Episcopal Church;
Trinity Episcopal Church, Pinopolis;
Vestry and Church Wardens of the Episcopal Church of The Parish of Christ Church;
Vestry and Church Wardens of The Episcopal Church of the Parish of St. John's, Charleston County.

Dated: March 1, 2018

Respectfully submitted,

/s/ Thomas S. Tisdale, Jr. _____
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