

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF DORCHESTER )

IN THE COURT OF COMMON PLEAS  
FOR THE FIRST JUDICIAL CIRCUIT

The Protestant Episcopal Church In The )  
Diocese Of South Carolina; )  
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; )  
St. Bartholomews Episcopal Church; )  
St. Davids 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 Episcopal Church Of )  
The Parish Of St. Helena and The Parish )  
Church of St. Helena Trust; The Vestry and )  
Church Wardens Of The Episcopal Church )  
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. )

Case No. 2017-CP-18-1909

SUMMONS

CHERYL SHAW  
CLERK OF COURT  
DORCHESTER COUNTY

2017 NOV 19 PM 3:01

FILED - RECORD

John's, Charleston County )  
 )  
 PLAINTIFFS, )  
 )  
 v. )  
 )  
 The Episcopal Church (a/k/a, The )  
 Protestant Episcopal Church in the )  
 United States of America); The Episcopal )  
 Church in South Carolina )  
 DEFENDANT. )  
 \_\_\_\_\_ )

**TO THE ABOVE-NAMED DEFENDANT AND YOUR ATTORNEY(S):**

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action of which a copy is herewith served upon you, and to serve a copy of your Answer on the subscriber at his office and the other counsel at their offices, within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiffs will apply to the Court for the relief demanded in the Complaint.

Dated: November 19, 2017

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Carolina; and The Trustees of the Protestant Episcopal  
Church of South Carolina, a South Carolina Corporate  
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STATE OF SOUTH CAROLINA )  
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 COUNTY OF DORCHESTER )  
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 The Protestant Episcopal Church In The )  
 Diocese Of South Carolina; )  
 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; )  
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 St. Davids Church; St. James' Church, )  
 James Island, S.C.; St. Paul's Episcopal )  
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 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 )  
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 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 )  
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 and Church-Wardens Of The Episcopal )  
 Church Of The Parish Of Christ Church; )  
 Vestry and Church Wardens Of The )

IN THE COURT OF COMMON PLEAS  
 FOR THE FIRST JUDICIAL CIRCUIT

Case No. 2017-CP-18-1909

COMPLAINT  
 (Jury Trial Demanded)

GHERYL GRANHAM  
 CLERK OF COURT  
 DORCHESTER COUNTY

2017 NOV 19 PM 3:01

FILED - RECORD

Episcopal Church Of The Parish Of St. )  
 John's, Charleston County )  
 )  
 PLAINTIFFS, )  
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 v. )  
 )  
 The Episcopal Church (a/k/a, The )  
 Protestant Episcopal Church in the )  
 United States of America); The Episcopal )  
 Church in South Carolina )  
 DEFENDANT. )  
 \_\_\_\_\_ )

The Plaintiffs, complaining of the Defendants, would respectfully show and allege unto this Honorable Court as follows:

1. The Plaintiffs are South Carolina non-profit religious corporations each of which owns in fee simple improved real property and leasehold interests located in South Carolina.
2. The Defendant, The Episcopal Church (hereinafter "TEC") is an unincorporated association with a business address of 815 2nd Avenue, New York, New York. TEC transacts business in the State of South Carolina and there are members of TEC that are citizens of the State of South Carolina.
3. The Defendant TEC is a voluntary association of corporately independent dioceses.
4. The Defendant, The Episcopal Church in South Carolina (hereinafter "ECSC"), is an unincorporated association with a business address of 98 Wentworth Street, Charleston, South Carolina. At least one of its members is a citizen of South Carolina. It transacts business in the State of South Carolina.
5. The Defendant ECSC is a voluntary association of parish churches.

6. In 2013, the plaintiffs brought a civil action against the Defendants; said civil action bearing Civil Action No.: 2013-CP-18-00013 which was filed in the Court of Common Pleas, for the County of Dorchester (hereinafter the “Legal Action”). In the Legal Action, the Defendants asserted counterclaims against Plaintiffs seeking declaratory and injunctive relief. In its counterclaims, the Defendants requested that the court enjoin the Plaintiffs from possessing their real properties, including the improvements thereon, and to determine the persons who should have possession of such. Further, the Defendants sought a declaration that the Plaintiffs had no interest in their real properties, that their real properties must be held and used solely for the mission and ministry of the Defendants.

7. The acquisition of each Plaintiffs’ real properties, the improvements constructed thereon, together with the maintenance, repair, and renovations of their properties all have been done in good faith by the Plaintiffs upon the belief that the Plaintiffs were the title owners of their real properties with the exclusive right to possess and control their properties.

8. On February 3, 2015, the Honorable Diane Goodstein issued a Final Order in the Legal Action. The Final Order dismissed the counterclaims of the Defendants asserted in the Legal Action. Thereafter, the Defendants appealed the Final Order and on August 2, 2017, the South Carolina Supreme Court, in a divided decision, reversed in part, the Final Order. On November 17, 2017, the South Carolina Supreme Court denied the Petitions for Rehearing and in said Order (hereinafter “Judgment”) held that its August 2, 2017 decision is the final decision of the Court.

9. As a result of the Judgment, upon information and belief, the Defendants intend to possess, or direct the possession of the said properties of the Plaintiffs, to others.

10. As a result of the Judgment, the Plaintiffs bring this action under Section 27-27-10, et. seq., of the Code of Laws of the State of South Carolina, seeking recovery, individually, from the Defendants for the full value of all improvements on each Plaintiffs real or leasehold property to the extent it has been finally determined that they, individually, agreed to an express trust in favor of TEC. The Plaintiffs widely vary on evidence as to such agreement (“accession”) and do not by this suit or otherwise admit to such agreement. To the extent, however, that a Plaintiff is determined by the Court to have so agreed, these betterment claims are made.

### **PLAINTIFFS**

#### **The Protestant Episcopal Church in The Diocese of South Carolina (“Diocese of South Carolina”)**

11. The Diocese of South Carolina is a South Carolina non-profit, charitable, corporation. It was incorporated on November 14, 1973 as “The Protestant Episcopal Diocese of South Carolina.” Prior to its incorporation, the Diocese of South Carolina was organized and operated as an unincorporated association holding its first convention on May 12, 1785 at The State House in Charleston, South Carolina.

12. The Diocese has never agreed to, nor has TEC sought, an express trust in Diocese property and none exists. Since its creation, the Diocese has acquired real property in fee simple and has leased certain property believing in good faith that it had good title to the real property and that the lease conveyed and secured the title and interest represented. The value of The Diocese real property improvements far exceeds the value of the unimproved real properties or leaseholds.

13. To the extent any property interest exists in favor of Defendants, The Diocese seeks from the Defendants the present value of the improvements to

the real properties it owns which have been made so much more valuable as a result of said improvements.

14. The acquisition by the Diocese real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by the Diocese upon the belief that the Diocese was the title owner of its real properties.

15. All improvements on the real properties owned by the Diocese were made in good faith with the belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

16. As a result, The Diocese is entitled to recover from the Defendants the present value of the improvements to real properties, together with interest thereon.

**All Saints Protestant Episcopal Church, Inc. (“All Saints”)**

17. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

18. All Saints is a South Carolina non-profit corporation. Its business address is 1425 Cherokee Road, Florence, South Carolina. It was incorporated on September 11, 1958.

19. In 1957, All Saints was planted and supported by St. John’s Episcopal Church of Florence, SC. in 1958, voluntarily associating with the Diocese of South Carolina as a mission and in 1960, as a parish. Originally meeting in Royall School, All Saints built its current sanctuary in 1960 and has worshipped there and expanded its campus since then.

20. All Saint’s acquisition by real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

21. The value of All Saints real property improvements far exceeds the value of the unimproved real properties.

22. All Saints seeks from the Defendants the sum of the present value of the improvements to its real properties made more valuable as the result of said improvements.

23. As a result, All Saints is entitled to recover from the Defendants the value of all improvements it made upon its real properties.

**Church Of The Cross, Inc. and Church Of The Cross Declaration Of Trust**

24. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

25. The Plaintiff Church of the Cross has existed as a religious South Carolina nonprofit and eleemosynary corporation since July 3, 1979. Prior to its incorporation, it existed as a religious unincorporated association since May 23, 1767.

26. The value of The Cross real property improvements far exceeds the value of the unimproved real properties.

27. The Cross seeks from the Defendants the present value of the improvements to the real properties it owns which have been made so much more valuable as a result of said improvements.

28. The acquisition by the Cross real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by the Diocese upon the belief that the Diocese was the title owner of its real properties.

29. As a result, The Cross is entitled to recover from the Defendants the present value of the improvements to real properties, together with interest thereon.

**The Church of Our Saviour of the Diocese of South Carolina**

30. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

31. The Church of Our Saviour of the Diocese of South Carolina (hereinafter "Our Saviour") is a South Carolina non-profit corporation. Its business address is 4416 Betsy Kerrigan Parkway, Johns Island, South Carolina. It was incorporated on March 10, 1981. Prior to its incorporation, Our Saviour conducted worship services on Johns Island, South Carolina beginning in the early 1970's. Our Saviour was established as a mission on November 20, 1980. Our Saviour acquired real properties for the purpose of on which have been constructed a church building and other buildings.

32. Our Saviour's acquisition by real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

33. The acquisition by Our Saviour real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by Our Saviour upon the belief that Our Saviour was the title owner of its real properties.

34. The value of Our Saviour real property improvements far exceeds the value of the unimproved real properties.

35. Our Saviour seeks from the Defendants the present value of improvements to its real properties which have been made so much more valuable as a result of said improvements.

36. As a result, Our Saviour is entitled to recover from the Defendants the value of all



improvements to its real properties, together with interest thereon.

**The Church of the Epiphany (Epsicopal)**

37. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

38. The Church of the Epiphany (Episcopal) (hereinafter "Epiphany") is a South Carolina non-profit corporation. Its business address is Palmer Street at Porcher Avenue, Eutawville, South Carolina. It was incorporated on July 10, 1972.

39. Since Epiphany's creation, it has acquired real properties on which have been constructed a church building and other buildings.

40. Epiphany's acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

41. The acquisition of Epiphany's real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by Epiphany's upon the belief that Epiphany's was the title owner of its real properties.

42. Our Saviour seeks from the Defendants the present value of improvements to its real properties which have been made so much more valuable as a result of said improvements.

43. As a result, Our Saviour is entitled to recover from the Defendants the value of all improvements to its real properties, together with interest thereon.

**St. Davids Church**

44. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically

restated herein.

45. St. Davids Church (hereinafter "St. Davids") is a South Carolina non-profit corporation. Its business address is 420 Market Street, Cheraw, South Carolina. St. Davids Parish (named after the patron saint of Wales) was established by an Act of the Colonial Assembly on April 12, 1768. The Act directed that a church, chapel and a parsonage be built. The church was completed in 1773. It was first incorporated on May 7, 1885 and then again on October 1, 1915.

46. Since St. Davids creation, it has acquired real properties for the purpose of constructing a church building and other buildings.

47. St. Davids acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

48. The acquisition of St. Davids real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by St. Davids upon the belief that St. Davids was the title owner of its real properties.

49. St. David's seeks from the Defendants the present value of improvements to its real properties which have been made so much more valuable as a result of said improvements.

50. As a result, St. David's is entitled to recover from the Defendants the value of all improvements to its real properties, together with interest thereon.

**The Vestry And Church Wardens Of The Episcopal Church Of The Parish Of St. Helena  
and The Parish Church of St. Helena Trust**

51. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

52. St. Helena Parish was created in 1712 by an Act of the Colonial Assembly under the authority of the Church Act of 1706. St. Helena is a South Carolina non-profit corporation legislatively incorporated on March 22, 1786. Its business address is 507 Newcastle Street, Beaufort South Carolina.

53. Since St. Helena's creation, it has acquired real properties on which have been constructed a church buildings and other buildings.

54. St. Helena's acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

55. The value of St. Helena's real property improvements far exceeds the value of the unimproved real properties.

56. St. Helena's seeks from the Defendants the present value of the improvements since its real properties have been made so much more valuable as a result of said improvements.

57. All improvements made to its real properties owned by St. Helena's were made in good faith with the belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

58. As a result, St. Helena is entitled to recover from the Defendants the value of all

improvements made to its real properties, together with interest thereon.

**Vestry and Church-Wardens Of The Episcopal Church Of The Parish of St. John's,  
Charleston County**

59. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

60. St. John's Parish was created by an act of Assembly on April 9, 1734. St. John's was legislatively incorporated in 1786.

61. Since St. John's creation, it has acquired real properties on which is constructed a church building and other buildings.

62. St. John's acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

63. The acquisition of St. John's real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by St. John's upon the belief that St. John's was the title owner of its real properties.

64. The value of St. John's real property improvements far exceeds the value of the unimproved real properties.

65. St. John's seeks from the Defendants the present value of the improvements since its real properties have been made more valuable as a result of said improvements.

66. All improvements made to the real properties owned by St. John's were made in good faith with the belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

67. As a result, St. John's is entitled to recover from the Defendants the value of all improvements it made upon its real properties, together with interest thereon.

**The Vestry and Church Wardens Of St. Jude's Church of Walterboro**

68. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

69. The Vestry and Church Wardens Of St. Jude's Church of Walterboro (hereinafter "St. Jude's") is a South Carolina non-profit corporation. Its business address is 907 Wichman Street, Walterboro, South Carolina. It was incorporated on July 19, 1905.

70. Since St. Jude's incorporation, it has acquired real properties on which a church building and other buildings have been constructed.

71. St. Jude's acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

72. The acquisition of St. Jude's real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by upon the belief that St. Jude's was the title owner of its real properties.

73. The value of St. Jude's real property improvements far exceeds the value of the unimproved real properties.

74. St. Jude's seeks from the Defendants the sum of the present value the improvements since its real properties have been made more valuable as a result of said improvements.

75. As a result, St. Jude's is entitled to recover from the Defendants the value of all improvements made to its real properties.

**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**

76. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

77. 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 (hereinafter "St. Michael's") is a South Carolina non-profit corporation. Its business address is 71 Broad Street, Charleston, South Carolina.

78. By Act of the General Assembly of South Carolina, Act No. 795 entitled "**An Act for Dividing the Parish of St. Philip's, Charlestown, and for Establishing Another Parish in the said Town, by the Name of the Parish of St. Michael...**" adopted June 14, 1751, certain commissioners were empowered to acquire property for the construction of a St. Michael's Church building and parsonage house on or near the place where the old church of the parish of St. Philip, Charlestown, formerly stood, and to be known as Saint Michael.

79. The Protestant Episcopal Church of the Parish of Saint Michael, in Charleston, in the State of South Carolina (hereinafter "St. Michael's") is a Legislatively chartered South Carolina non-profit corporation, originally incorporated as the "Vestries and Church-wardens of the Episcopal Churches of the Parishes of St. Philip and St. Michael, Charleston," by Act of the General Assembly of the State of South Carolina on March 24, 1785, Act No. 1278 entitled "**An Act to Incorporate the Vestries and Church-wardens of the Episcopal Churches in the Parishes of St. Philip and Saint Michael, in Charleston; and for other Purposes,**".

80. Since St. Michael's creation, it has acquired real properties on which church buildings and other buildings has been constructed.

81. St. Michael's acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

82. The acquisition of St. Michael's real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by St. Michael's upon the belief that St. Michael's was the title owner of its real properties.

83. The value of St. Michael's real property improvements far exceeds the value of the unimproved real properties.

84. St. Michael's seeks from the Defendants the present value of the improvements since its real properties have been made so much more valuable as a result of said improvements.

85. All improvements made to the real properties owned by St. Michael's were made in good faith on the belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

86. As a result, St. Michael's is entitled to recover from the Defendants the present value of all improvements upon its real properties, together with interest thereon.

#### **Trinity Episcopal Church, Edisto Island**

87. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

88. Trinity Episcopal Church, Edisto Island (hereinafter "Trinity Edisto") began as a Chapel of Ease in St. John's parish. On April 7, 1770 the Colonial Assembly authorized the building of the chapel. The parishioners built a church in 1774. In 1793, it was incorporated by

the General Assembly as “The Episcopal Church on Edisto Island.” Since Trinity Edisto’s creation, it has acquired real properties on which a church building and other buildings were constructed.

89. Trinity Edisto’s acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

90. The acquisition of Trinity Edisto’s real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by Trinity Edisto upon the belief that Trinity Edisto was the title owner of its real properties.

91. The value of Trinity Edisto’s real property improvements far exceeds the value of the unimproved real properties.

92. Trinity Edisto seeks from the Defendants the present value for the improvements since its real properties have been made more valuable as a result of said improvements.

93. As a result, Trinity Edisto is entitled to recover from the Defendants the present value of the improvements it to its real properties, together with interest thereon.

**The Vestries and Churchwardens of the Parish of Old St. Andrew’s Parish Church (hereinafter “Old St. Andrew’s”),**

94. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

95. On November 30, 1706 the General Assembly Old St. Andrew’s was created by the General Assembly. It was legislatively chartered on March 24, 1785.

96. Old St. Andrew’s acquisition of real properties and the maintenance, repair and



renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

97. The acquisition of Old St. Andrew's real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by Old St. Andrew's upon the belief that Old St. Andrew's was the title owner of its real properties.

98. The value of Old St. Andrew's real property improvements far exceeds the value of the unimproved real properties.

99. Old St. Andrew's seeks from the Defendants the present value of the improvements to its real properties.

100. As a result, Old St. Andrew's is entitled to recover from the Defendants the value of all improvements to its real properties. together with interest thereon.

**Trinity Episcopal Church, Pinopolis**

101. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

102. Trinity Episcopal Church, Pinopolis ("Trinity, Pinopolis") is a South Carolina non Profit corporation. Its business address is 1915 Pinopolis Road, Pinopolis Island, South Carolina. It has existed as an unincorporated association since 1808. It was incorporated on February 24, 1971.

103. Since Trinity Pinopolis's incorporation, it has acquired real properties on which a church building and other buildings have been constructed.

104. Trinity Pinopolis's acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its

parishioners.

105. The acquisition of Trinity Pinopolis's real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in good faith by Trinity Pinopolis upon the belief that Trinity Pinopolis was the title owner of its real properties.

106. The value of Trinity Pinopolis's real property improvements far exceeds the value of the unimproved real properties.

107. Trinity Pinopolis seeks from the Defendants the sum of the present value for the Improvements to its real properties.

108. All improvements to real properties owned by Trinity Pinopolis were made in good faith with the belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

109. As a result, Trinity Pinopolis is entitled to recover from the Defendants the value of all improvements it made upon its real properties.

**Christ St. Paul's Episcopal Church ("Christ St. Paul's")**

110. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

111. Christ St. Paul's is a South Carolina non-profit corporation. Its business address is Chapel Road, Yorges Island, South Carolina. It was incorporated on December 3, 1997.

112. In 1706 the Church Act passed by the Colonial Assembly created the nine original parishes in South Carolina. In 1708 the Act defined St. Paul's Parish as one of the Parishes making up Colleton County, (now Charleston County).

113. St. Paul's acquisition by real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

114. The acquisition by St. Paul's real properties, the improvements constructed on, together with the maintenance, repair and renovations of its properties all have been done in good faith by the Diocese upon the belief that the Diocese was the title owner of its real properties.

115. The value of St. Paul's real property improvements far exceeds the value of the unimproved real properties.

116. St. Paul's seeks from the Defendants the sum of the present value of the improvements to its real properties.

117. All improvements on the real properties owned by St. Paul's were made in good faith with the belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

118. As a result, St. Paul's is entitled to recover from the Defendants the value of all improvements it made upon its real properties.

**Church Of The Holy Comforter ("Holy Comforter")**

119. Plaintiff repeats and reiterates every allegation in this Complaint as if specifically restated herein.

120. Holy Comforter is a South Carolina non-profit corporation incorporated by an Act of the General Assembly on December 21, 1857. Its business address is 213 N. Main Street, Sumter, South Carolina.

