

RUNYAN & PLATTE
ATTORNEYS AT LAW
2015 Boundary Street
Suite 239
Beaufort, South Carolina 29902
(843) 473-6800

C. Alan Runyan
arunyan@runyanplatte.com

August 2, 2018

Via Email

The Honorable Edgar W. Dickson
190 Gibson Street
P.O. Box 1949
Orangeburg, SC 29116
edicksonj@sccourts.org
edicksonlc@sccourts.org

Re: *The Protestant Episcopal Church in the Diocese of South Carolina
et al. v. The Episcopal Church, et al.
Case No. 2013-CP-18-00013*

*The Protestant Episcopal Church in the Diocese of South Carolina
et al. v. The Episcopal Church, et al.
Case No. 2017-CP-18-1909*

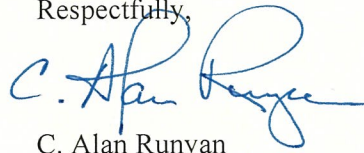
Dear Judge Dickson:

Enclosed is the list of issues (and why they are issues) requested by the Court at our status conference last Thursday. As requested, these issues only deal with the 5 separate opinions of the Supreme Court in the first referenced case. They do not deal with the Betterments action and its effect on the issues that may arise out of the Court's decision on the 3 pending motions in the first referenced case.

The Court asked that the issues list be "brief". We believe the 3 primary issues are brief. These are summarized on page 4. Fulfilling the "why" part of the Court's direction, because of the lack of agreement between the opinions, required more space.

We look forward to the Court's direction on hearing and resolving the remaining motions and issues in both cases.

Respectfully,



C. Alan Runyan

CAR/jps
cc: All Counsel of Record

STATE OF SOUTH CAROLINA)
)
 COUNTY OF DORCHESTER)
)
 The Protestant Episcopal Church In The)
 Diocese Of South Carolina; The Trustees of)
 The Protestant Episcopal Church in South)
 Carolina, a South Carolina Corporate Body,)
 et al.)
)
 PLAINTIFFS,)
)
 v.)
)
)
 The Episcopal Church (a/k/a, The)
 Protestant Episcopal Church in the)
 United States of America); The Episcopal)
 Church in South Carolina)
 DEFENDANTS.)
 _____)

IN THE COURT OF COMMON PLEAS
 FOR THE FIRST JUDICIAL CIRCUIT

Case No. 2013-CP-18-00013

**UNRESOLVED ISSUES FOR
 FOR ACTION CONSISTENT WITH THE
 FIVE OPINIONS OF THE SOUTH
 CAROLINA SUPREME COURT
 DECISION**

I. Preliminary Statement

A. “Great uncertainty” in “matters of great importance”

On August 2, 2017, the South Carolina Supreme Court (the “Court”) issued a decision consisting of 5 separate opinions on an appeal from a decision by Judge Diane Goodstein in this action. *The Protestant Episcopal Church in the Diocese of South Carolina, et al. v. The Episcopal Church, et al.*, 421 S.C. 201, 806 S.E. 2d 802 (2017) (“Collective Opinions”). Certain plaintiffs petitioned for rehearing. The issues raised and arguments made in the Petition for Rehearing, by a 2-2 vote, were not passed upon by the Court. On November 17, 2017 Justice Kittredge, joined by Acting Justice Toal, stated the refusal to appoint a fifth justice to allow full court consideration of these “matters of great importance” was “shocking”, “deeply troubling” and “raises constitutional implications as the Court has blocked a fair and meaningful merit review of the rehearing petition.” Order, November 17, 2017, Attachment 1. Because of the Court’s failure to pass upon the merits

of the rehearing petition, Acting Justice Toal concluded the “Courts’ collective opinions in this matter give rise to great uncertainty in that we have given little to no coherent guidance in this case. Given our lack of agreement, I have no doubt that the court will see more litigation involving these issues...” *Id.*

Earlier today, TEC cited basic law in its letter to the Court on the enforcement of the Collective Opinions as if these 5 separate opinions in a single case are typical and lend themselves to simple enforcement. The five separate opinions of the Court in a single case are not typical. Indeed, there is only one case – this one – of its kind. In contrast, less than 3 months ago, on May 7, 2018, the defendants told the United States Supreme Court it should not grant Plaintiffs’ Petition for Certiorari because the Collective Opinions were “a poor vehicle for review.” Attachment 2, Brief of Respondents in Opposition to Petition for Writ of Certiorari at 23-26. This was because the Collective Opinions are based on an “incomplete record”, which “contains significant ambiguities”. The Collective Opinions are “fractured not only in rationale but even on facts.”. *Id.* at 2, 23. The absence “of a majority opinion on the standard of review” creates “ambiguities” making it “difficult to discern which of the trial court findings stand.” *Id.* at 23-24. Finally, they stated that the constitutional issue raised in the rehearing petition had not been decided by the Court which means none of those issues have been decided. *See* Attachment 3.¹

B. The Law of the Case

¹ Plaintiffs’ Petition for a Writ of Certiorari was denied by the United States Supreme Court on June 4, 2018. A denial of a petition for cert has no precedential effect. *Teague v. Lane*, 489 U.S. 288, 296 (1989). *See also Shaw v. Delta Air Lines, Inc.*, 463 U.S. 85, 94 n. 11 (1983) (“denials of certiorari have no precedential force”); *Stebbing v. Maryland*, 469 U.S. 900, 907 (1984) (Marshall, J., dissenting from the denial of certiorari) (noting that “it is axiomatic that denials of writs of certiorari have no precedential value”); *Walker v. Georgia*, 555 U.S. 979 (2008) (Stevens, J., respecting the denial of the petition for writ of certiorari) (noting that “Court’s denial [of certiorari] has no precedential effect”).

Defendants state the Collective Opinions are the “law of the case”. Amended Petition for Relief at 4. The decision of an appellate court on a legal issue is the law of the case to be followed in subsequent proceedings. *Arizona v. California*, 460 U.S. 605, 618-19 (1983); *Flexor v. PHC-Jasper, Inc.*, 413 S.C. 561, 571-75, 776 S.E.2d 397, 403-05 (S.C. App. 2015). The doctrine encompasses legal issues not raised on appeal but which should have been or legal issues raised on appeal but expressly rejected (including legal issues necessary to a decision of the expressly decided legal issues). If a legal ruling is the law of the case under these standards, whether it is to be applied to subsequent proceedings in the case is a product of the discretionary balancing between the need for finality and (1) substantially different evidence than that considered by the appellate court or (2) when the ruling was clearly erroneous and would work a manifest injustice. *Id.*

C. Defendants’ Jurisdictional Premise

Defendants premise their Amended Petition arguments on their view that the Court issued the declaratory judgment at issue here. However, the Court’s jurisdiction was not original, it was as the court reviewing the declaratory judgment decision of the circuit court. South Carolina appellate courts cannot raise issues *sua sponte* and then decide them. They do so after the issue is presented to, and decided by, the trial court and then preserved for appellate review. *State v. Dunbar*, 356 S.C. 138, 142-43, 587 S.E.2d 691, 693 (2003) (issue not considered by the trial court cannot be considered *sua sponte* by an appellate court as a basis of its decision).

The Plaintiffs have never been heard by a trial court or the Court on any of the following issues.

1. The issue of whether, on a parish by parish basis, there was an express written and signed agreement to the Dennis canon was not considered by Judge

Goodstein.

2. The issue of whether any trusts created were irrevocable.
 - a. Judge Goodstein never considered this issue because she ruled there were no trusts created.
 - b. The Court decided the issue *sue sponte* not allowing Plaintiffs to be heard because it did not consider the issues raised in the Petition for Rehearing.
3. The issue of whether there is a “minimal burden” requirement imposed by *Jones v. Wolf* when a religious entity creates a trust.
 - a. The defendants never raised the argument and Judge Goodstein did not consider it.
 - b. The Court decided the issue *sua sponte* and did not pass upon the rehearing petition arguments.
4. Because of 2, Judge Goodstein was not asked by plaintiffs to consider whether a finding of a “minimal burden” requirement would violate the U.S. and South Carolina Supreme Court constitutional protections guaranteed by the 1st Amendment. That issue was first raised in the petition for rehearing because it was decided *sua sponte* in the Collective Opinions.
5. None of the defenses raised by the plaintiffs to the defendants’ counterclaims were considered by Judge Goodstein or the Court.

It is in this context that the Plaintiffs submit the following list of issues which are necessary to this Court’s ability, factually, legally, and constitutionally, to implement the Collective Opinions.

II. There are Unresolved Issues Necessary Before Any Enforcement of the Collective Opinions

A. Summary of Primary Issues

1. As to each parish church, was an express trust created because it expressly agreed to the Dennis canon in a signed writing, and if so was that trust irrevocable? If not, was it revoked?
2. Is the beneficiary of the Trustees' diocesan assets the Diocese except as to Camp St. Christopher?
3. The defenses plaintiffs raised to the counterclaims of TEC and the ECSC must be heard and decided.

B. Express Trusts by Parish Churches: The narrowest grounds upon which there was agreement among the Collective Opinions *in result* did not decide which parish plaintiffs agreed to the creation of an express trust with the beneficiary being, The Episcopal Church ("TEC"). In other words, this Court must determine which Parish Plaintiffs agreed, in writing, to the Dennis Canon. Only an evidentiary hearing in which the parties present their evidence as to the creation of an express trust can determine this issue. The following are the reasons this issue must be decided by this Court.

- a. There was no majority on the standard of review. Two justices (Pleicones and Hearn) use a *de novo* standard of review (contrary to *All Saints*) based on their opinion that the primary purpose of the action was equitable. Two justices (Toal and Kittridge) used the same standard of review as *All Saints*, based on their opinion that the primary purpose of the action was legal. Justice Beatty did not state his opinion on the standard of review.

b. There was no agreement among the 5 opinions on the rationale and there was no agreement on the results among four opinions: Acting Justice Pleicones, Justice Hearn, Justice Kittridge and Acting Justice Toal.

1. Justice Hearn and Acting Justice Pleicones joined in each other's opinions.

Both Justices used a *de novo* standard of review and made their own findings of fact. Both used the legal standard of deference to the decision of the highest body in a hierarchical church on corporate control and the existence of a trust. Justice Hearn also found a constructive trust was created by operation of law based on parish agreement to the "rules" of TEC by the plaintiffs in which Acting Justice Pleicones joined.

2. A majority (Beatty, Kittridge and Toal) agreed that the legal standard to be applied when resolving disputes between religious organizations over property and corporate control is neutral principles of state property and trust law. These three opinions did not agree on the result when this legal standard was applied to the facts.

1. Justice Beatty and Justice Toal found that neutral principles were to be strictly applied as they would be to any non-religious organization as decided by *All Saints* which was decided consistently with the constitutional principles of *Jones v. Wolf*. Justice Toal found no express or constructive trusts were created by any parish. Justice Beatty's opinion on the result is discussed below.

2. Justice Kittridge read *Jones v. Wolf* to constitutionally require

that a state's neutral principles of law, when applied to the creation of an express trust by a religious organization, must require no more than a "minimal burden" in its creation. If applied strictly, without a minimal burden, the idea that any express trust would be created on the facts was "laughable." Applying neutral principles minimally, express trusts were created by some parishes but they were revocable and they were revoked.

3. Justice Toal expressly rejected the concept of minimal burden and Justice Beatty impliedly rejected it because he required that neutral principles of state law be "strictly" applied.
 4. The minimal burden issue was not presented to nor decided by the trial court. It was raised for the first time by defendants in Appellants' Brief. Any decision arising out of it was *sua sponte*.
- c. There was apparent, partial agreement in a result between the opinions of Acting Justice Pleicones, Justice Hearn and Chief Justice Beatty. Necessarily the narrowest ground must be found in CJ Beatty's opinion.
1. Chief Justice Beatty's opinion states:
 1. He does not agree with any of the analysis of the Pleicones and Hearn opinions and he did not agree with "much of the result."
 2. *All Saints* and *Jones v. Wolf* control this dispute.
 3. The Dennis Canon is not a legally cognizable form of trust required by *Jones*. Unequivocal intent expressed by the action

of *each settlor* (each parish church) is required to create a trust, *not* the intent of TEC, the beneficiary.

4. If a parish church agreed in a signed writing to the Dennis Canon then it would create a trust with TEC as its beneficiary.
 5. Certain parishes, unnamed by Justice Beatty, did not do that and no trust was created.
 6. Certain parishes, unnamed by Justice Beatty, “assuming they acceded in writing”, created a trust.
2. An express trust is the only type of trust that could be created that would produce the narrowest agreement *in result* between the opinions of Beatty, Pleicones and Hearn.
1. Judge Goodstein found that the only types of trust that could exist on these facts were an express trust and a constructive trust. Final Order at 34. That ruling was not appealed and no other types of trusts were discussed by the Collective Opinions.
 2. Justice Hearn (joined by Acting Justice Pleicones) found that a “constructive trust” was created by operation of law based on 36 parishes agreement to the “rules” of TEC. (However, a constructive trust is not based on intent but arises when “circumstances under which property was acquired make it inequitable that it should be retained by the one holding legal title.” *Lollis v. Lollis*, 291 S.C. 525, 529, 354 S.E. 2d 559, 561 (1987).

3. CJ Beatty did not agree on the use of deference to determine the outcome of a dispute between religious organizations over property and corporate control, as did Pleicones and Hearn.
 4. CJ Beatty required the following to create a trust: each parish, individually, had to agree in a signed writing to the Dennis Canon evidencing an unequivocal intent to create a trust. That is an express trust under neutral principles of South Carolina trust law. It is not a constructive trust because neither intent nor a specific writing are required to create a constructive trust.
 5. CJ Beatty did not agree that any parish agreement to “rules” created an express trust.
 - i. Promises of allegiance to TEC were not sufficient.
 - ii. He disagreed with the analysis of Pleicones and Hearn.
 - iii. He never mentioned agreement to “rules” but repeatedly required agreement to a specific document created by TEC, the Dennis Canon.
3. The record on appeal does not contain facts that establish as to each parish church an express agreement to the Dennis Canon in a signed writing.
 1. The defendants did not include the documents claimed to exist in their counsels’ partial summary of the record which was included in the record on appeal. They included 5 pages from

their reconsideration memorandum to Judge Goodstein in the record on appeal.

2. Facts argued in the statements of counsel are not record facts which can be considered by an appellate court.
3. The defendant-appellants had the burden of presenting the appellate court with an adequate record on appeal. *Harkins v. Greenville County*, 340 S.C. 606, 616, 533 S.E. 2d 886, 891 (2000).
4. Justice Hearn (joined by Acting Justice Pleicones) found that... “this issue (of accession by the parish churches) is not properly before the Court...”
5. The 5-page summary of the parishes who allegedly created an express trust is factually inaccurate.²
 - i. As an example only, with respect to St. Philip’s Church, the only statement which is used to allege an express trust was created in favor of TEC is a portion of a sentence from 1987 corporate Articles of Restatement stating the parish purpose is to operate in accordance with “Articles of Religion.” These religious precepts are not in any record and have nothing

² Justice Toal’s Opinion states that the “...defendants contend that twenty-eight of the plaintiff parishes ‘acceded’ in some form or another...” and later refers to “alleged express promise” of the twenty-eight plaintiff parishes (emphasis added).

whatsoever to do with the Dennis canon or any other canon.

- ii. TEC also does not believe it is accurate. The summary does not list “Old St. Andrews” as a parish that created an express trust in favor of TEC, yet TEC contends that Old St. Andrews created an express trust.

4. The statement by CJ Beatty that the “remaining parishes” expressly agreed to the Dennis Canon is not based on anything in the record and he did not identify which did and which did not. The interpretation of his opinion as advocated by the defendants would be clearly erroneous and a manifest injustice and could not be the law of the case.

- 1. TEC admitted that 7 or 8 parishes did not expressly agree to the Dennis Canon. These parish churches are not before the court.
- 2. No justice, including CJ Beatty, decided whether an express trust was created based on any record facts on a parish by parish basis as to any “remaining Parishes”.
- 3. CJ Beatty’s opinion cannot be presumed to have violated the Supreme Court’s rule by relying on the summary of counsel as record facts.
- 4. If such an assumption were made, his opinion would be internally inconsistent.

- i. The summary of documents not in the record

does not reference facts that each parish expressly agreed in a signed writing to the Dennis Canon.

ii. To the extent that CJ Beatty's is interpreted to mean he relied on the factual findings of Hearn and Pleicones that would be inconsistent with the other parts of his opinion.

1. He disagreed with all their analysis and much of their result.

2. Hearn and Pleicones found a constructive trust was created by all 36 parishes by facts found *de novo*. Though not stating a standard of review, CJ Beatty could not be interpreted to agree with theirs because he expressly disagreed with their analysis.

3. Express trusts, though legally narrower than constructive trusts, are not a factual subset of constructive trusts.

d. If this Court finds that an express trust was created by any parish church, then next part of the first primary issue is whether that parish church irrevocably agreed to that express trust and if not, whether it was revoked.

C. Diocesan Beneficiary of Trustees Assets: The second primary issue is with respect to

the uncertainty about what decision was made with respect to who is the beneficiary of the assets of plaintiff, Trustees of the Protestant Episcopal Church in South Carolina (the “Trustees”) held for the benefit of plaintiff, The Protestant Episcopal Church in the Diocese of South Carolina (the “Diocese”). A decision is required.

- a. Acting Justice Toal and Justice Kittredge found the Trustees “diocesan” assets were held for the Diocese as the beneficiary.
- b. Acting Justice Pleicones and Justice Hearn found the Trustees “diocesan” assets were held for the ECSC as the beneficiary.
- c. Chief Justice Beatty found, according to Acting Justice Toal’s summary in note 72, that only Camp St. Christopher was held by the Trustees for the benefit of the ECSC.
- d. The defendants maintain that CJ Beatty’s ruling is not limited just to the Camp.
- e. Justice Beatty made only one reference to this issue in footnote 29. In that footnote, he states (1) title to the Camp should remain with the Trustees, (2) it was held for the welfare of the “Protestant Episcopal Diocese of South Carolina” and (3) the “disassociated diocese could not claim to be the successor to the “Protestant Episcopal Church in the Diocese of South Carolina.” He stated no legal reason for that decision other than what he had just been discussing.
 1. To the extent that the decision is broader than Camp St. Christopher, as the defendants maintain, CJ Beatty did not give the reason and that would be a violation of a court rule which he should not be presumed to have done.
 1. All the justices agreed that the Diocese disassociated from TEC

in 2012. CJ Beatty disagreed with the analysis of Pleicones and Hearn which used the legal standard of deference to find that the ECSC was the proper beneficiary. There is no stated strictly applied neutral principle of law by CJ Beatty that would result in the Diocese not being who it is after its successful disassociation from TEC and that would be contrary to the factual findings of Judge Goodstein.

2. CJ Beatty cannot be presumed to be implicitly using a *de novo* review standard for making findings of fact using neutral principles of law because he would have violated Rule 220(b)(1), SCACR. *Dearybury v. Dearybury*, 351 S.C. 278, 283, 569 S.E. 2d 367, 369 (2002) (“when an appellate court chooses to find facts in accordance with its own view of the evidence, the court must state distinctly its findings of fact and the reason for its decision.”)

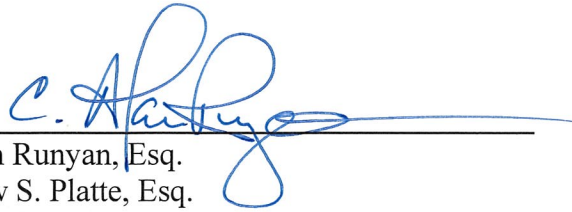
D. The last primary issue relates to the defenses raised by all the plaintiffs to TEC’s and ECSC’s counterclaims. These were not decided by the trial court, were not an issue on appeal and were not decided by the Collective Opinions. They remain to be heard and decided.

Respectfully submitted,

August 2, 2018

The Protestant Episcopal Church In The Diocese of South Carolina; and The Trustees of the Protestant Episcopal Church of South Carolina, a South Carolina Corporate Body:

By: _____



C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

Henrietta U. Golding, Esq.
McNAIR LAW FIRM
P.O. Box 336
Myrtle Beach, SC 29578
(843) 444-1107

C. Mitchell Brown, Esq.
NELSON, MULLINS, RILEY & SCARBOROUGH
1320 Main Street, 17th Floor
Post Office Box 11070
Columbia, SC 29211-1070

Charles H. Williams, Esq.
WILLIAMS & WILLIAMS
P.O. Box 1084
Orangeburg, SC 29116-1084
(803) 534-5218

David Cox, Esq.
BARNWELL WHALEY PATTERSON & HELMS, LLC
288 Meeting Street, Suite 200
Charleston, SC 29401
(843) 577-7700

Thomas C. Davis, Esq.
HARVEY & BATTEY, PA
1001 Craven Street
Beaufort, SC 29901
(843) 524-3109

Christ St. Paul's Episcopal Church

I. Keith McCarty, Esq.
McCARTY LAW FIRM, LLC
P.O. Box 30055
Charleston, SC 29417
(843) 793-1272

Holy Trinity Episcopal Church
Bill Scott, Esq.
PEDERSEN & SCOTT, PC
775 St. Andrews Blvd.
Charleston, SC 29407
(843) 556-5656

St. James' Church, James Island, S.C.
Mark Evans, Esq.
147 Wappoo Creek Drive, Ste. 202
Charleston, SC 29412
(843) 762-6640

The Church of St. Luke and St. Paul, Radcliffeboro
David B. Marvel, Esq.
PRENNER MARVEL, P.A.
636 King Street
Charleston, SC 29403
(843) 722-7250

David L. DeVane, Esq.
110 N. Main Street
Summerville, SC 29483
(843) 285-7100

The Church Of The Good Shepherd, Charleston, SC
John Furman Wall, Esq.
140 Wando Reach Court
Mt. Pleasant, SC 29464
(843) 408-3433

*Vestry and Church-Wardens Of The Episcopal
Church Of The Parish Of Christ Church*
Allan P. Sloan, III, Esq.
Joseph C. Wilson IV, Esq.
PIERCE, HERNS, SLOAN & WILSON
321 East Bay Street; P.O. Box 22437
Charleston, SC 29413
(843) 722-7733

All Saints Protestant Episcopal Church, Inc.
C. Pierce Campbell, Esq.
TURNER, PADGET, GRAHAM & LANEY
319 South Irby Street, P.O. Box 5478
Florence, SC 29501
(843) 662-9008

The Church Of The Holy Cross

C. Pierce Campbell, Esq.
TURNER, PADGET, GRAHAM & LANEY
319 South Irby Street, P.O. Box 5478
Florence, SC 29501
(843) 662-9008

St. Bartholomews Episcopal Church

C. Pierce Campbell, Esq.
TURNER, PADGET, GRAHAM & LANEY
319 S. Irby Street, P.O. Box 5478
Florence, SC 29502
(843) 656-4429

Church Of The Holy Comforter

Thornwell F. Sowell, Esq.
Bess J. DuRant, Esq.
SOWELL GRAY STEPP & LAFFITTE, LLC.
P.O. Box 11449
Columbia, SC 29211
(803) 929-1400

*The Vestry and Church Wardens Of The Episcopal
Church Of The Parish Of St. Matthew*

Francis M. Mack, Esq.
656 Fort Motte Road
Saint Matthews, SC 29135
(803)-414-4138

Church Of The Redeemer

Robert R. Horger, Esq.
HORGER, BARNWELL & REID, LLP
P.O. Drawer 329
1459 Amelia Street
Orangeburg, SC 29115
(803) 531-3000

The Church Of The Resurrection, Surfside

William A. Bryan, Esq.
BRYAN & HAAR
P.O. Box 14860
Surfside Beach, SC 29587
(843) 238-3461

Trinity Church of Myrtle Beach

Susan MacDonald, Esq.
Jim Lehman, Esq.
NELSON, MULLINS, RILEY & SCARBOROUGH, LLP
BNC Bank Corporate Center, Suite 300
3751 Robert M. Grissom Parkway
Myrtle Beach, SC 29577
(843) 448-3500

Saint Luke's Church, Hilton Head
Henrietta U. Golding, Esq.
McNAIR LAW FIRM
P.O. Box 336
Myrtle Beach, SC 29578
(843) 444-1107

The Vestry and Wardens Of St. Paul's Church, Summerville
Brandt Shelbourne, Esq.
SHELBOURNE LAW FIRM
131 E. Richardson Avenue
Summerville, SC 29483
(843) 871-2210

Trinity Episcopal Church, Pinopolis
John B. Williams, Esquire
WILLIAMS & HULST, LLC
209 East Main Street
Moncks Corner, SC 29461
(843) 761-8232

St. Paul's Episcopal Church of Bennettsville, Inc.
Harry Easterling, Jr., Esq.
116 North Liberty Street
Bennettsville, SC 29512
(843) 479-2878

*Church Of The Cross, Inc. and Church Of The
Cross Declaration of Trust*
C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

St. Davids Church
C. Alan Runyan, Esq.

Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

Harry Easterling, Jr., Esq.
116 North Liberty Street
Bennettsville, SC 29512
(843) 479-2878

*The Church Of Our Saviour, Of The Diocese
Of South Carolina*

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

*The Protestant Episcopal Church, Of The Parish Of
St. Philip, In Charleston, In The State of South Carolina*

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

G. Mark Phillips, Esq.
NELSON, MULLINS, RILEY &
SCARBOROUGH, LLP
Liberty Center, Suite 600
151 Meeting Street
Charleston, SC 29401-2239
(843) 720-4383

W. Foster Gaillard, Esq.
WOMBLE, CARLYLE, SANDRIDGE & RICE, LLP.
P.O. Box 999
Charleston, SC 29402
(843) 722-3400

*The Protestant Episcopal Church, The Parish Of St.
Michael, In Charleston, In The State of South Carolina and
St. Michael's Church Declaration Of Trust*

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

Henry Grimball, Esquire
WOMBLE, CARLYLE, SANDRIDGE & RICE, LLP.
P.O. Box 999
Charleston, SC 29402
(843) 722-3400

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

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

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

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

Trinity Episcopal Church, Edisto Island

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

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

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239

Beaufort, SC 29902
(843) 473-6800

*The Vestries and Churchwardens of the Parish
of Old St. Andrew*

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800

The Church Of The Epiphany (Episcopal)

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
(843) 473-6800