

STATE OF SOUTH CAROLINA)
)
 COUNTY OF DORCHESTER)
)
 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. Luke's)
 Church, Hilton Head Island;)
 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)

IN THE COURT OF COMMON PLEAS
 FOR THE FIRST JUDICIAL CIRCUIT

FILED-RECORDED
 2017 NOV 20 PM 4:24
 CLERK OF COURT
 DORCHESTER COUNTY

Case No. 2017-CP-18-1909

AMENDED SUMMONS

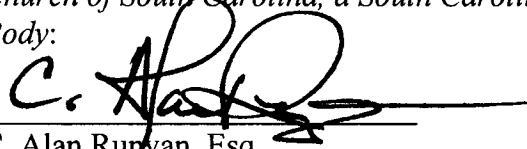
Episcopal Church Of The Parish Of St.)
 John's, Charleston County; The Vestries and)
 Churchwardens of the Parish of Old St.)
 Andrews's Parish Church)
)
 PLAINTIFFS,)
)
 v.)
)
 The Episcopal Church (a/k/a, The)
 Protestant Episcopal Church in the)
 United States of America); The Episcopal)
 Church in South Carolina)
 DEFENDANT.)
 _____)

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

YOU ARE HEREBY SUMMONED and required to answer the Amended 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 Amended Complaint within the time aforesaid, the Plaintiffs will apply to the Court for the relief demanded in the Amended Complaint.

Dated: November 20, 2017

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STATE OF SOUTH CAROLINA)
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 COUNTY OF DORCHESTER)
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IN THE COURT OF COMMON PLEAS
 FOR THE FIRST JUDICIAL CIRCUIT

Case No. 2017-CP-18-1909

AMENDED COMPLAINT
 (Jury Trial Demanded)

FILED-RECORDED
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 CHERYL GRAHAM
 CLERK OF COURT
 DORCHESTER COUNTY

Episcopal Church Of The Parish Of St.)
 John's, Charleston County; The Vestries and)
 Churchwardens of the Parish of Old St.)
 Andrews's Parish Church)
)
 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.)
 _____)

The Plaintiffs, complaining of the Defendants, respectfully allege 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. ECSC transacts business in the State of South Carolina and is a member of TEC.
5. The Defendant ECSC is a voluntary association of parish churches located in South Carolina.

6. In 2013, the plaintiffs brought a civil action against the Defendants, 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 of Plaintiffs’ real properties and leaseholds, the improvements constructed thereon, together with the maintenance, repair, and renovations of their properties all have been done by the Plaintiffs in the good faith belief that the Plaintiffs were the title owners of their real properties and leaseholds 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 seek the possession, 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 present value of all improvements on each Plaintiffs real or leasehold property to the extent it has been finally determined that they, individually, agreed (“acceded”) 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. Plaintiff repeats and reiterates every allegation in this Amended Complaint as if specifically restated herein.

12. 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 since 1785.

13. The Diocese of South Carolina has never agreed to, nor has TEC sought, an express trust in Diocese of South Carolina property and none exists.

14. Since its creation, the Diocese of South Carolina has acquired real property in fee simple and has leased certain real property believing in good faith that it had good title to the real property and that at to leased property, that it conveyed and secured the title and interest represented.

15. The value of the Diocese of South Carolina's real property and leasehold improvements far exceeds the value of the unimproved real properties or leaseholds.

16. To the extent the Defendants possess any property interest in the Diocese of South Carolina property exists in favor of Defendants, The Diocese of South Carolina seeks from the Defendants the present value of the improvements to the real properties it owns and its leasehold interests which have been made more valuable as a result of said improvements.

17. The acquisition by the Diocese of South Carolina of its real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in the good faith belief that the Diocese of South Carolina was the title owner of its real properties and that the leaseholds secured the interest represented by therein.

18. All improvements on the real properties owned by the Diocese of South Carolina and leasehold interests were made in the good faith belief that it solely owned, and would continue to possess and own, said real properties and leaseholds upon which improvements existed.

19. As a result, if the Defendants possess any property interest, the Diocese of South Carolina 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")

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

21. 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.

22. 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.

23. All Saint'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.

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

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

26. The value of All Saints real property improvements far exceeds the value of the unimproved real properties, together with interest.

27. 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.

28. 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 ("The Cross")

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

30. 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.

31. The Cross' acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

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

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

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

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

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

The Church of Our Saviour of the Diocese of South Carolina ("Our Saviour")

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

38. 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.

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

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

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

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

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

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

The Church of the Epiphany (Episcopal) ("Epiphany")

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

46. 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.

47. Epiphany's acquisition of its real properties and the maintenance, repair and

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

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

49. 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 the good faith belief that Epiphany was the title owner of its real properties.

50. Epiphany seeks from the Defendants the present value of improvements to its real properties which have been made more valuable as a result of said improvements.

61. As a result, Epiphany is entitled to recover from the Defendants the present value of all improvements to its real properties, together with interest thereon.

St. Davids Church ("St. Davids")

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

63. St. Davids is a South Carolina non-profit corporation. Its business address is 420 Market Street, Cheraw, South Carolina. St. Davids Parish 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.

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

65. All improvements on the real properties owned by St. Davids were made in the

good faith belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

66. 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 the good faith belief that St. Davids was the title owner of its real properties.

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

68. As a result, St. David's is entitled to recover from the Defendants the present 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 ("St. Helena")

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

70. 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.

71. 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.

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

73. The acquisition by St. Helena of its real properties, the improvements constructed

thereon, together with the maintenance, repair and renovations of its properties all have been done in the good faith belief that St. Helena was the title owner of its real properties.

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

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

76. St. Helena seeks from the Defendants the present value of improvements to its real properties which have been made more valuable as a result of said improvements.

77. As a result, St. Helena is entitled to recover from the Defendants the present value of all improvements 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 ("St. John's")

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

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

80. 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.

81. 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 the good faith belief that St. John's was the title owner of its real properties.

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

83. 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.

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

85. As a result, St. John's is entitled to recover from the Defendants the present 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 ("St. Jude's")

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

87. 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.

88. 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.

89. All improvements made to its real properties owned by St. Jude's were made in

the good faith belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

90. 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 the good faith belief that St. Jude's was the title owner of its real properties.

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

92. 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.

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

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 ("St. Michael's")

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

95. 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,**". Its business address is 71 Broad Street, Charleston, South Carolina.

96. 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.

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

98. 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 the good faith belief that St. Michael’s was the title owner of its real properties.

99. The value of St. Michael’s real property improvements far exceeds the value of the unimproved real properties.

100. St. Michael’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.

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

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

Trinity Episcopal Church, Edisto Island (“Trinity Edisto”)

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

91. 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."

92. 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.

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

93. 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 the good faith belief that Trinity Edisto was the title owner of its real properties.

94. The value of Trinity Edisto's real property improvements far exceeds the value of the unimproved real properties.

95. Trinity Edisto 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.

96. 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

("Old St. Andrew's")

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

98. Under the Judgment, Old St. Andrews was found not to have agreed ("acceded") to an express trust in favor of TEC. However, the Supreme Court incorrectly identified Old St. Andrews as the "Parish of St. Andrews, Mt. Pleasant". Old St. Andrews makes these contingent allegations because of the Supreme Court's failure to correct its misidentification of Old St. Andrews.

99. 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.

100. 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.

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

102. 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 the good faith belief that Old St. Andrew's was the title owner of its real properties.

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

104. To the extent that the misidentification remains uncorrected, Old St. Andrew's

seeks from the Defendants the present value of the improvements to its real properties.

105. To the extent that the misidentification remains uncorrected, 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 ("Trinity Pinopolis")

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

107. Trinity Pinopolis is a South Carolina non-Profit corporation. Its business address is 1915 Pinopolis Road, Pinopolis Island, South Carolina. Prior to its incorporation, it existed as an unincorporated association since 1808. It was incorporated on February 24, 1971.

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 the good faith 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 since its real properties have been made more valuable as a result of said improvements.

108. All improvements to real properties owned by Trinity Pinopolis were made in the

good faith 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 present 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 Amended 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. Christ St. Paul'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.

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

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

116. Christ St. Paul's seeks from the Defendants the sum of the present value of the improvements to its real properties, since its real properties have been made more valuable as a result of said improvements.

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

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

Church Of The Holy Comforter ("Holy Comforter")

119. Plaintiff repeats and reiterates every allegation in this Amended 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.

121. Holy Comforter began worship services in Sumter, South Carolina in 1844 and constructed its first church building in 1859. Thereafter, Holy Comforter acquired its current location and constructed the present church building in 1909 where the parish has continually conducted services to the present. Additional real property was subsequently acquired by Holy Comforter.

122. Holy Comforter acquisition of real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

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

properties.

124. The value of Holy Comforter's real property improvements far exceeds the value of the unimproved real properties.

125. Holy Comforter seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

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

Church Of The Redeemer ("Redeemer")

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

129. Redeemer is a South Carolina non-profit corporation. Its business address is 1606 Russell Street, Orangeburg, South Carolina. It was incorporated on May 27, 1922.

130. Redeemer is a part of St. Matthews Parish, which was established, by an Act of The Colonial Assembly on August 12, 1768. This Act provided that a chapel was to be built in "Orangeburgh Territory."

131. Prior to its incorporation, Redeemer was an unincorporated association beginning in 1851. Its church building was occupied in 1857. It was moved and renovated at its current location in 1895.

132. Redeemer'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.

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

134. The value of Redeemer's real property improvements far exceeds the value of the unimproved real properties.

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

136. All improvements on the real properties owned by Redeemer'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.

137. As a result, Redeemer's is entitled to recover from the Defendants the present value of all improvements it made upon its real properties, together with interest.

Holy Trinity Episcopal Church ("Holy Trinity")

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

139. Holy Trinity is a South Carolina non-profit corporation. Its business address is 95 Folly Road, Charleston, South Carolina. It was incorporated on February 11, 1957.

140. Prior to its incorporation, Holy Trinity began as an unincorporated association on

October 21, 1956.

141. Holy Trinity'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.

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

143. The value of Holy Trinity's real property improvements far exceeds the value of the unimproved real properties.

144. Holy Trinity seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

146. As a result, Holy Trinity is entitled to recover from the Defendants the present value of all improvements to its real properties, together with interest.

St. Bartholomews Episcopal Church ("St. Bartholomews")

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

148. St. Bartholomews is a South Carolina non-profit corporation. Its business address is 103 Campus Drive, Hartsville, South Carolina. It was incorporated on February 8, 1922.

149. St. Bartholomews began holding worship services on June 27, 1902 in a building loaned for that purpose. A church building was constructed in 1909-1910 and St. Bartholomews voluntarily associated with the Diocese of South Carolina as a mission and then as a parish on May 13, 1914.

150. A rectory was constructed in 1922 and a church school building was constructed in 1923. In 1987, a fire destroyed the church buildings and the present building was built on the site thereafter.

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

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

153. The value of St. Bartholomews real property improvements far exceeds the value of the unimproved real properties.

154. St. Bartholomews seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

156. As a result, St. Bartholomews is entitled to recover from the Defendants the value

of all improvements it made upon its real properties, together with interest.

St. James' Church, James Island, S.C. ("St. James")

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

158. St. James is a South Carolina non-profit corporation. Its business address is 1872 Camp Road, James Island, South Carolina. It was incorporated on February 15, 1832.

159. Under the 1706 Church Act, James Island was a part of St. Andrews Parish.

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

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

162. The value of St. James real property improvements far exceeds the value of the unimproved real properties.

163. St. James seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

165. As a result, St. James is entitled to recover from the Defendants the value of all improvements it made upon its real properties, together with interest.

St. Paul's Episcopal Church Of Bennettsville, Inc.
("St. Paul's, Bennettsville")

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

167. St. Paul's, Bennettsville is a South Carolina non-profit corporation. Its business address is 306 Fayetteville Avenue, Bennettsville, South Carolina. It was incorporated on March 4, 2002.

168. St. Paul's, Bennettsville held its first worship services on May 29-30, 1894 as "The Bennettsville Mission." In 1896, St. Paul's was called "St. Paul's Mission." In 1897, the lot where the present church is located was acquired and the church was built, the first services being held on Christmas Day, 1897. A parish house was completed in 1948.

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

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

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

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

173. St. Paul's, Bennettsville seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

The Church Of St. Luke and St. Paul, Radcliffeboro ("The Cathedral")

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

176. The Cathedral is a South Carolina non-profit corporation. Its business address is 126 Coming Street, Charleston, South Carolina. It was incorporated on April 7, 1951.

177. The Cathedral is the successor by merger to St. Luke's, Charleston and The Protestant Episcopal Church of St. Paul, Radcliffeboro ("St. Paul's").

178. St. Luke's, Charleston was incorporated by an act of General Assembly on December 21, 1858.

179. St. Luke's began its services in 1858. It voluntarily associated with the Diocese of South Carolina in 1858. Its first church building was occupied in 1862 and it was regularly used and until October 7 1864 when struck by a shell. Services resumed in October 1865. In 1899 it ceased to be used but was revived as a mission in 1904 and as a parish later that year. It again voluntarily associated with the Diocese of South Carolina in 1905.

180. St. Paul's was incorporated by the General Assembly on December 21, 1814 as The Protestant Episcopal Church of St. Paul in Radcliffeboro. As the church primarily served the outlying plantation families, it was known as the "planters' Church". It voluntarily associated

with the Diocese of South Carolina upon its becoming a Parish.

181. On May 11, 1950, St. Luke's Church, Charleston and The Protestant Episcopal Church of St. Paul in Radcliffeboro were merged into The Church of St. Luke and St. Paul, Radcliffeboro, using the church building of St. Paul's for their worship services.

182. The Cathedral'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.

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

184. The value of The Cathedral's real property improvements far exceeds the value of the unimproved real properties.

185. The Cathedral seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

187. As a result, The Cathedral is entitled to recover from the Defendants the value of all improvements to its real properties, together with interest.

The Church Of The Good Shepherd, Charleston, S.C. ("Good Shepherd")

188. Plaintiff repeats and reiterates every allegation in this Amended Complaint as if

specifically restated herein.

189. Good Shepherd is a South Carolina non-profit corporation. Its business address is 1393 Miles Drive, Charleston, South Carolina. Its predecessor was incorporated on December 19, 1833, as The St. Peter's Church of Charleston.

190. In 1927, St. Peter's Church of Charleston was reorganized by an Act of the General Assembly.

191. Good Shepherd, as the successor to St. Peter's Church, held its first service in an army tent in February of 1922. The lot on which the tent stood was bought and the first chapel was opened for services on May 14, 1922.

192. Good Shepherd'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.

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

194. The value of Good Shepherd real property improvements far exceeds the value of the unimproved real properties.

195. Good Shepherd seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

196. All improvements on the real properties owned by Good Shepherd were made

in the good faith belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

197. As a result, Good Shepherd is entitled to recover from the Defendants the value of all improvements to its real properties, together with interest.

The Church Of The Holy Cross (“Holy Cross”)

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

199. Holy Cross is a South Carolina non-profit corporation. Its business address is 335 N. Kings Highway, Stateburg, South Carolina.

200. Holy Cross was incorporated by an act of the General Assembly in 1788 as “The Vestry and Church Wardens of the Episcopal Church of Claremont.”

201. The first church was built in 1788 on land donated by General Thomas Sumter. A new church was built between 1850 and 1852 on the same site. The name was changed to “Church of the Holy Cross.”

202. The acquisition by Holy Cross of its real properties and the maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

203. The acquisition of Holy Cross real properties, the improvements constructed thereon, together with the maintenance, repair and renovations of its properties all have been done in the good faith belief that Holy Cross was the title owner of its real properties, made more valuable as the result of said improvements.

204. The value of Holy Cross real property improvements far exceeds the value of the

unimproved real properties.

205. Holy Cross seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

207. As a result, Holy Cross is entitled to recover from the Defendants the value of all improvements to its real properties, together with interest.

The Church Of The Resurrection, Surfside (“Resurrection”)

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

209. Resurrection is a South Carolina non-profit corporation. Its business address is 8901 Hwy. 17 Bypass, Surfside Beach, South Carolina. It was incorporated on July 12, 1971.

209. Since Resurrection’s creation, it has acquired real properties on which it constructed a church building, other buildings, and improvements.

210. Resurrection’s acquisition of real properties and the improvements, maintenance, repair and renovation of its properties has been accomplished from funds donated or obtained from its parishioners.

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

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

213. The value of Resurrection real property improvements far exceeds the value of the unimproved real properties.

214. Resurrection seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

215. As a result, Resurrection is entitled to recover from the Defendants the value of all improvements to its real properties, together with interest.

The Vestry and Church Wardens Of The Episcopal Church Of The Parish Of St. Matthew ("St Matthews Fort Motte")

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

217. St. Matthews Fort Motte is a South Carolina non-profit corporation. Its business address is 1164 Fort Motte Road, Fort Motte, South Carolina.

218. St. Matthews Fort Motte was established by an act of the Colonial Assembly on August 12, 1768. On February 29, 1788, St. Matthews Fort Motte was incorporated by the General Assembly as "The Vestry and Church Wardens of the Episcopal Church of the Parish of St. Matthew", and granted full title to the property of the parish and full rights to acquire or dispose of property "as they shall think convenient."

219. The original Parish Church was located near Halfway Swamp in Orangeburgh

Township. The church building was subsequently rebuilt in several locations within St. Matthew's Parish. The present church building was erected in the community of Fort Motte in 1852.

220. St. Matthews Fort Motte'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.

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

222. The value of St. Matthews Fort Motte's real property improvements far exceeds the value of the unimproved real properties.

223. St. Matthew seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

225. As a result, St. Matthew is entitled to recover from the Defendants the value of all improvements to its real properties, together with interest.

The Vestry and Wardens Of St. Paul's Church, Summerville ("St. Paul's")

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

227. St. Paul's is a South Carolina non-profit corporation incorporated on December 19, 1855. Its business address is 316 W Carolina Avenue, Summerville, South Carolina.

228. St. Paul's traces its history back to colonial Dorchester. For 11 years after the Passage of the Church Act of 1706 the area of Dorchester encompassing what is now Summerville was part of St. Andrews Parish. In 1717 Episcopalians within Dorchester petitioned the Colonial Assembly for their own parish. The new parish, formed by an Act passed on Dec. 11, 1717 was named St. George. "The Church and Parsonage-House were directed to be built where the Commissioners should direct, with the consent of a majority of the Parishioners, professing the religion of the Church of England, who should contribute to the expense."

229. By 1720 construction of the outer portion of a church was complete. The construction was paid for by local subscriptions and by a contribution from the Colonial Assembly.

230. In 1734 the Church was renovated and enlarged and in 1751 a bell tower was added. The British occupied the area during the Revolutionary War. In 1782 the British set fire to the church, with only the bell tower surviving.

231. As of 1829 the rector of St. Paul's Stono was holding regular summer services in parishioner's homes. St. Paul's Summerville remained a chapel-of-ease under the vestry of St. Paul's Stono until after 1865. In 1830 parishioners built a church in Summerville near the present site.

232. In 1855 the General Assembly of South Carolina incorporated "The Vestry and Wardens of St. Paul's Church, Summerville" and granted ownership of certain property including the property on which the church is located to St. Paul's Summerville.

233. Since 1857 the church has undergone repairs caused by the 1886 earthquake, has

seen the addition of Ambler Hall in 1924, the construction of the parish house in 1974 and a new addition in 1986. The church added an additional 33,000 sq. ft. of space in 2002 and 2003, Doar Hall and the C/Y ("Children/Youth) Building. All work was at the impetus of, under the direction of and at the expense of the rector and parishioners of St. Paul's Summerville.

234. St. Paul'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.

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

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

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

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

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

Trinity Church Of Myrtle Beach ("Trinity")

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

241. Trinity is a South Carolina non-profit corporation. Its business address is 3000 N Kings Highway, Myrtle Beach, South Carolina. Trinity was incorporated on May 27, 1949.

242. It has continually existed and acted as a duly formed corporation with its Vestry And Wardens serving as its Board of Directors pursuant to its governance documents since its incorporation in 1949.

243. Trinity was organized in June 1939 as the "Church of the Messiah." It became a mission of the Diocese of South Carolina in October 1939. In 1949, it voluntarily associated with the Diocese of South Carolina as a parish. In 1951, its name was changed to "Trinity Episcopal Church." In November 2009, its name was changed to "Trinity Church of Myrtle Beach."

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

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

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

247. Trinity seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

248. All improvements on the real properties owned by Trinity were made in the good

faith belief that it solely owned, and would continue to possess and own, said real properties upon which improvements existed.

249. As a result, Trinity is entitled to recover from the Defendants the present value of all improvements it made upon its real properties, together with interest.

Vestry and Church-Wardens Of The Episcopal Church Of The Parish Of Christ Church ("Christ Church")

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

251. Christ Church is a South Carolina non-profit corporation. Its business address is 2304 Highway 17 North, Mount Pleasant, South Carolina. It was incorporated on March 27, 1787.

252. Christ Church Parish was created by the Church Act of 1706.

253. The first building's foundation was laid in 1707. It was destroyed by fire in 1724, rebuilt with brick in 1727 and destroyed again by the British in 1782, but rebuilt again in 1794.

254. Christ Church was incorporated by the General Assembly on March 27, 1787 as "The Vestry and Church-Wardens Of The Episcopal Church Of The Parish Of Christ Church."

255. Christ Church'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.

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

257. The value of Christ Church real property improvements far exceeds the

value of the unimproved real properties.

258. Christ Church seeks from the Defendants the sum of the present value of the improvements to its real properties since its real properties have been made more valuable as a result of said improvements.

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

260. As a result, Christ Church is entitled to recover from the Defendants the present value of all improvements it made upon its real properties, together with interest.

St. Luke's Church, Hilton Head

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

262. St. Luke's Church, Hilton Head (hereinafter "St. Luke's") is a South Carolina non-profit corporation, incorporated on March 4, 1969 with the South Carolina Secretary of State. St. Luke's history extends back to May 23, 1767 when St. Luke's Parish was established by an Act of the Colonial Assembly. In 1788, parishioners built a wooden chapel known as Zion Chapel of Ease on Hilton Head Island. The Chapel was abandoned in 1862 due to the Island's occupation by Union Troops.

263. On December 21, 1964, worship services resumed as a mission under the name "St. Luke's" and then expanded in 1970 by becoming a parish, voluntarily associating with the Diocese of South Carolina.

264. Since St. Luke's incorporation, it has acquired real properties for the purpose of constructing a church building and other buildings.

265. St. Luke'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.

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

267. The value of St. Luke's real property improvements far exceeds the value of the unimproved real properties.

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

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

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

The Protestant Episcopal Church, Of The Parish Of Saint Philip, In Charleston, In The State Of South Carolina ("St. Philip's")

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

272. The Protestant Episcopal Church, of the Parish of Saint Philip, in Charleston, in the State of South Carolina (hereinafter, "St. Philip's") was founded in Charleston in 1680.

273. The original church structure known as St. Philip's, Charlestown, was constructed in 1681-1682 at the southeast corner of Broad and Meeting Streets in Charleston (now the location

of St. Michael's Church). Construction was begun on a new brick structure at the present day location of St. Philip's Church in 1711, and the first service in the new St. Philip's Church, at its present day location, was held on Easter Sunday, 1723.

274. This structure was destroyed by fire in 1835 and replaced by the present day structure built between 1835 and 1838.

275. The Protestant Episcopal Church, of the Parish of St. Philip, in Charleston, in the State of South Carolina, 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.

276. Thereafter, on December 20, 1791, by Act of the General Assembly of the State of South Carolina, Act No. 1533, the General Assembly split St. Philip's Church and St. Michael's Church into two separate corporations, making each a separate and distinct body politic and corporate. The Legislature created "**The Protestant Episcopal Church, of the Parish of Saint Philip, in Charleston, in the State of South Carolina**" and "The Protestant Episcopal Church, of the Parish of Saint Michael, in Charleston, in the State of South Carolina."

277. St. Philip's Church has been in continuous existence and operation serving the spiritual needs of the people of Charleston and surrounding areas since 1680, and since its incorporation in 1791 by Act No. 1533, The Protestant Episcopal Church, of the Parish of Saint Philip, in Charleston, in the State of South Carolina, also known as "St. Philip's Church", has continued to validly exist and function as a South Carolina corporation, in good standing, with all such rights and powers granted unto it by law and by the said 1791 Act, along with all such rights and powers under the Act of 1785 that were not implicitly repealed by the Act of 1791.

278. Since its creation, St. Philip's has acquired real properties on which church buildings and other buildings have been constructed.

279. St. Philip'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.

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

281. The value of St. Philip's real property improvements far exceeds the value of the unimproved real properties.

282. St. Philip's seeks from the Defendants the present value of the improvements since the real property claimed by Defendants has been made more valuable as a result of said improvements.

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

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

WHEREFORE, The Plaintiffs pray for the following:

(a) For each Plaintiff that is found in this action to have expressly acceded to the Dennis Canon, a judgement against the Defendants for the present value of the improvements on the real

properties and leaseholds owned by each such Plaintiff, together with interest from the date of such judgement.

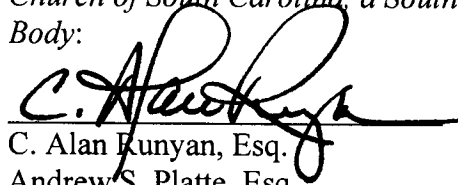
(b) That this action be stayed pending the final disposition of Plaintiffs' Petition for a Writ of Certiorari to the United States Supreme Court and any further action by the United States Supreme Court in Civ. No. 2013-CP-18-0013, Appellate Case No. 2015-0013 and pending a determination on whether accession occurred with respect to each Plaintiff.

(c) For such other relief as the Court deems just and proper.

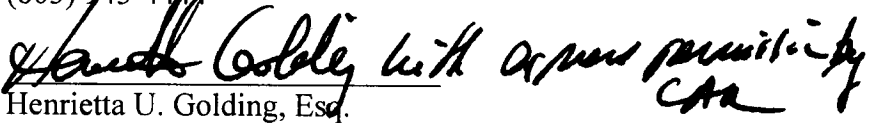
Dated: November 20, 2017

Respectfully submitted,

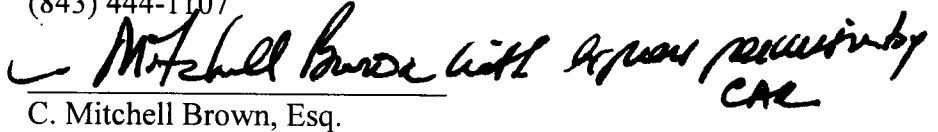
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