

STATE OF SOUTH CAROLINA)
)
COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FOR THE FIRST JUDICIAL CIRCUIT

The Protestant Episcopal Church In The)
Diocese Of South Carolina;)
All Saints Protestant Episcopal Church, Inc.;)
Christ St. Paul's Episcopal Church;)
Church Of The Cross, Inc. and Church)
Of The Cross Declaration Of)
Trust; Church Of The Holy Comforter;)
Church of the Redeemer;)
Holy Trinity Episcopal Church; St. 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)

Case No. 2017-CP-18-1909

**MEMORANDUM IN SUPPORT OF
MOTION TO ESTABLISH
COMPLEX CASE DESIGNATION**

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 moved this court on December 27, 2017 to designate this case complex. The principal action, Civil Action No.: 2013-CP-18-00013 (“principal case”), was designated complex on January 29, 2013 by this Court which order permitted a revisit if requested by Defendant but there was no revisit. Both this case and the principal case are dependent upon each other. Decisions in the principal case will determine the actions taken in this case. By assigning this case to the same judge, judicial economy will be promoted allowing a single judge to hear and decide all issues between the two cases as necessary. The Plaintiffs respectfully request this Court grant the motion for complex case designation.

September 24, 2018

Respectfully submitted,

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: /s/ C. Alan Runyan
 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 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