

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;)
 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)

IN THE COURT OF COMMON PLEAS
 FOR THE FIRST JUDICIAL CIRCUIT

Case No. 2013-CP-18-00013

**PLAINTIFFS' RESPONSE IN
 OPPOSITION TO DEFENDANTS'
 MEMORANDUM IN SUPPORT OF
 PETITION FOR EXECUTION**

- continues the Defendants’ pattern of avoiding Chief Justice Beatty’s opinion relying on dicta in footnote 72 of Acting Justice Toal’s dissenting opinion when it suits them and leaving out portions of it when it does not;
- argues against this Court’s duty to interpret the Collective Opinions because that would be an “appeal” yet it takes advantage of the latent ambiguity in the Collective Opinions to argue issues never before raised to, nor considered by, Judge Goodstein, and which were not appealed to, nor ruled upon, by the Collective Opinions;
- argues that the Collective Opinions referred trademark issues to the federal court, yet it advances a new issue of ownership of not only trademarks but also of the Diocese’s identity found in its names, seals and logos when that issue is foreclosed by an existing permanent injunction that was not appealed and is now the law of the case expressly prohibiting the Defendants from using those names, marks and seals;
- argues the Collective Opinions decided that Defendant ECSC is the beneficiary of all Diocesan assets held by the Trustees Corporation and in doing so quotes Acting Justice Toal’s summary leaving out the words that only Camp St. Christopher was at issue;

III. Defendants use the Collective Opinions lack of clarity for their own benefit.

A cogent example of the lack of clarity in the Collective Opinions is found not in Plaintiffs’ arguments, but in Defendants. Defendants are apparently unable to decide, construing the Collective Opinions most favorably to them, what they held with respect to Defendants’ claimed

interest in Parish Plaintiffs' property: Defendants seeks to maintain two different positions on their alleged interest in Parish Plaintiffs' properties.

The Petition and Amended Petition both assert that "title" to the parish property "belonged" to the Defendants upon parish "disaffiliation". Petition for Execution, May 8, 2018; Amended Petition for Execution, May 16, 2018 at 8. Yet in their Motion to Dismiss, the betterments action filed in December 2017, Defendants assert that the "land and buildings of the parishes are owned by Plaintiff parishes" and that Defendants "do not own the land at issue and did not bring an action to recover land." Mot. Dismiss at 1. Similarly, in March 2018, in the federal court action, they maintained that the Collective Opinions required Plaintiffs to hold their properties in trust for Defendants as beneficiaries. (See Mot. Amend, *vonRosenberg, et al v. Lawrence, et al.* C.A. No. 2:13-cv-00587, ECF No. 125-1 p.4 (D.S.C. Mar. 1, 2018))

Now, still unable to decide, they assert **both** positions in their memorandum: "The parishes hold their property in trust for the benefit of TEC... (Mem. at 1,2)" **and** "upon disaffiliation, **title** to their property belonged to TEC...". Memo at 9 (emphasis added).

Additionally, they add new issues never raised before about the identity of the Diocese and Parishes by now contending the Collective Opinions held the names, marks, seals of the Diocese and the Parishes belong to the ECSC when those issues were never contested at trial nor discussed in the Collective Opinions. See discussion, *infra* at 6-9.

IV. Diocesan Property

Defendants assert that this Court should order the removal of the trustees of the Plaintiff, The Trustees of the Protestant Episcopal Church in South Carolina ("Trustees") and replace them with Trustees elected by Defendant, The Episcopal Church in South Carolina ("ECSC").

They do so asserting that the Trustees hold all real and personal property of the Diocese, including its “name, trademarks, service marks and seals,” (a new allegation) pursuant to 1880 and 1902 statutes. They argue that the ECSC, which did not come into existence until 2013, is the entity referenced in the statute, “Protestant Episcopal Church for the Diocese of South Carolina.” They then argue that the Collective Opinions resolved the issue whether ECSC is the referenced Diocese in its favor. None of these assertions accurately reflect the trial record, what was appealed or the Collective Opinions.

First, the Trustees neither hold all the real and personal property of the Diocese nor is all of what they own held for the Diocese as beneficiary. Judge Goodstein found as a fact, not appealed by the Defendants, that “The Trustee’s corporate purpose is to hold in trust property, receive assets under wills or gifts given by individuals or other organizations. Some assets are held for uses of the Diocese.” Fin. Or. at 16. The statute sets up two sources: (1) property given or acquired before 1902 and transferred to the Trustees, (2) property held by other corporations who voluntarily transfer it to the Trustees. Both of those are limited by the terms of the donations, gifts, etc. There was no testimony at trial about the scope of the Trustees holdings except that it held restricted and unrestricted assets including Camp St. Christopher. There is no evidence, and it is unbelievable to suggest, that the Trustees hold the Diocese’s name, marks and seal for the benefit of the Diocese.

Second, the issue decided by Judge Goodstein was whether the statutes referenced the Diocese and TEC, not ECSC. Fin. Order at 33, n.13. The Defendants contended that the statute’s reference to “said church” meant The Episcopal Church. The trial court found it meant the Diocese, not TEC. *Id.* A majority of the Supreme Court did not rule differently. Defendants superficial summary of 4 of the Collective Opinions omits what Acting Justice Toal and Chief Justice Beatty

actually said.

a. Camp St. Christopher

For the third time, the Defendants have misquoted Acting Justice Toal's statement. They claim she states, "summarizing the majority decision on Diocesan property", the Trustees held title for the ECSC by referencing this partial quotation, "...title in the Trustees corporation for the benefit of the associated diocese...". However, Acting Justice Toal's summary of the majority holding on the Trustees was that it was limited to Camp St. Christopher: "**With regard to Camp St. Christopher**, Chief Justice Beatty, Justice Hearn, and Acting Justice Pleicones would hold title is in the trustee corporation for the benefit of the associated Diocese, whereas Justice Kittredge and I would hold that the trustee corporation holds title for the beneficiary the disassociated diocese. 421 S.C. at 291, n. 72. (emphasis added).

Furthermore, as noted in previous memoranda, Justice Beatty's footnote 29, the only place in his opinion when the Diocese and the Trustees are mentioned, is limited to a discussion of Camp St. Christopher. 421 S.C. at 251, n. 29. Likewise, Acting Justice Toal's opinion only discusses the title to Camp St. Christopher as being at issue. *Id.* at 287.

b. New claims

While asserting that this Court can only enforce the Collective Opinions, the Defendants have added new claims which have never been raised before, were not raised at trial and were not appealed. Defendants' assertions of the right to the "names, trademarks, seals, logos, and other emblems" of the Plaintiffs was first raised in their May 16, 2018 Amended Petition for Execution. Defendants' May 8, 2018 Petition for Execution stated the property at issue "included land and buildings, along with considerable funds and other personal property such as books, silver, and historical archives." Pet. at 3. Two weeks later, Defendants amended their Petition adding this

sentence after that above. “It also includes trademarks, names, seals, logos and other indicia as personal property.” Am. Pet. at 3.

The Plaintiffs’ identities were never at issue in the trial court. The Defendants pleadings and the trial evidence was directed to the right to control the Plaintiffs, an issue tried and resolved under *All Saints*, when the trial court ruled that every Plaintiff properly followed neutral principles of corporate law to disassociate from TEC with their current leadership in control of the corporation. Justice Beatty agreed with Acting Justice Toal and Justice Kittredge that this was how corporate control was established. 421, S.C. at 249. That these procedures were properly followed was undisputed at trial and on appeal. All plaintiff non-profit corporations exist today as they did before their disassociation with their corporate identity and ownership interests intact subject only to the issue of the effect of the Dennis Canon on parish property. Defendants admit the Dennis Canon does not apply to Diocesan property.

The Collective Opinions recognize the fact of their disassociation and none of them make any reference to the “names” of Plaintiff Parishes being at issue. In short, the Defendants now seek to make the identity of the Plaintiffs an issue when this issue was not raised to, nor decided by the trial court, was not appealed and was not the subject of any of the Collective Opinions. Additionally, as to the Diocese, St. Philips, St. Michael’s and the Parish Church of St. Helena, the use of those names by them alone is currently protected by a permanent injunction.

Judge Goodstein issued a permanent injunction against TEC and the ECSC and any of its officers, employees, members and other associated persons from “using, issuing or adopting in any way, directly or indirectly, the names, styles, emblems or marks of the Plaintiffs ...”. This injunction covered those names, and other indicia, which are owned by the Plaintiff Diocese¹ and

¹ The Defendants admit that the Diocese is the owner. *Id.* at 39.

three Plaintiff Parishes, St. Philips, St. Michael's, and the Parish Church of St. Helena. Fin. Or. at 44-46. There were two statutory grounds for this injunction: service mark infringement, §§39-15-1105 *et. seq.* and §§16-17-310 and 320 (Improper use of names, styles and emblems). *Id.* at 37-43. Judge Goodstein found willful violations² and found “under both statutes, the Plaintiffs have established their entitlement to permanent injunctive relief.” *Id.* at 43. The Defendants appealed the “service mark infringement” ground but not the “improper use” ground.³

Defendants argued the invalidity of the service mark registration because of asserted conflicts with TEC's federal marks. For the first time on appeal, they contended that the state registrations should be cancelled. Appellant's Brief at 40-44, Attachment A. Defendants did not appeal the other statutory basis for the injunction, §§16-017-310 and 320. “Appellants have simply ignored it.” Respondent's Brief at 56, Attachment B.

Defendants having failed to appeal the alternative ground for the injunctive relief, the Collective Opinions do not directly address it. On the issue of the state registered service marks, Acting Justice Pleicones would “reverse the injunction granted to respondents on their service mark claim.” 421 S.C. at 231. Justice Hearn “concur[s] fully” in Acting Justice Pleicones opinion. 421 S.C. at 232. Acting Justice Toal joined by Justice Kittredge would affirm the trial court's decision on the service mark infringement by the Defendants. 421 S.C at 290. Chief Justice Beatty expressed no opinion deferring to the federal court the “rights to the service marks.” 421 S.C. at 249, n. 28. The Collective Opinions did not resolve the alternative basis of the permanent injunction, §16-17-310 (“names, styles, emblems or marks”) because it was not appealed. The

² “[T]he Defendants ‘willfully intended to trade on the registrants’ registrations and that they chose, intentionally, to use the names and seal of the Diocese as strategic support for TECSC's purposes.” *Id.* at 43.

³ “The court erred when it concluded that Plaintiffs’ state-registered trademarks are valid...” Ap. Br. at ii, 40, 44.

Diocese, St. Philips, and the Parish Church of St. Helena are the undisputed owners of their marks and the Defendants are under a permanent injunction prohibiting the use of those names and emblems.

On the appealed service mark registration ground, the Collective Opinions are evenly split 2-2 with Chief Justice Beatty expressing no opinion and therefore, Judge Goodstein's order is affirmed. The unappealed ground with its permanent injunction is now the law of the case. *Dreher v. S. Carolina Dep't. of Health & Env'tl. Control*, *_S.E._ 2d*, 2015 WL1223709 at 3 (S.C. Mar.18, 2915).

V. Parish Property

Chief Justice Beatty held that a trust could be created only by an express written agreement in a signed writing to the Dennis Canon, not by general agreement to TEC canons and rules.

As noted in previous memoranda, Chief Justice Beatty stated he disagreed with the analysis of Acting Justice Pleicones and Justice Hearn which would have reversed *All Saints* and applied a different legal standard. 421 S.C. at 248-49, 251. He affirmed the strict application of “the neutral principles of law approach enumerated in *All Saints* and *Jones*... aptly discussed by former Chief Justice Toal. See *All Saints Parish Waccamaw v. Protestant Episcopal Church in the Diocese of South Carolina*, 385 S.C. 428, 444, 685 S.E. 2d 163, 172 (2009)...”

Defendants are unwilling to engage the language of Chief Justice Beatty's opinion, preferring instead to rely upon dicta in Acting Justice Toal's dissenting footnote, 421 S.C. at 291, n. 72.⁴ The reason for that reluctance is that the Chief Justice's intent, gathered from the entirety

⁴ Acting Justice Toal would have denied all Defendants' claims to Plaintiffs' property.

of his opinion, was that an express trust could only be created by a written, signed agreement to the Dennis canon; a parish agreement to the canons and rules of TEC does not create an express trust under neutral principles of South Carolina law.

The Defendants never argued on appeal that any Plaintiff parish agreed in a signed writing **to the Dennis canon**. The trial record equally is devoid of any such argument. Rather, Defendants' argument on appeal was based on their post-trial submission that the Parish churches had acceded to the National Church's rules: "written promises to obey National Church rules," App. Br. at 11; "voluntary accession to the National Church's rules", *Id* at 38; "express promises in their governing documents to comply with the National Church's rules." *Id*. Because the Dennis canon was somewhere in those rules, an agreement to the rules they argued was an agreement specifically to the Dennis canon. *Id*. That argument is inconsistent with Chief Justice Beatty's opinion because he rejected similar facts in *All Saints*.

All Saints held that the Dennis canon, "had no legal effect on the title to the congregation property." This was despite the fact that the All Saints Waccamaw Parish had a provision in its Articles of Incorporation in which it promised to "conduct religious services and prosecute religious works under the forms and **according to the canons and rules of [TEC]...**" (emphasis added). There is nothing in *All Saints* that suggests such a promise, to canons and rules generally, created an express trust to the Dennis canon.

Chief Justice Beatty repeatedly stated that express agreement to the Dennis Canon, not TEC rules, was required.⁵ In the face of the opinions of Justices Hearn and Acting Justice

⁵ These parishes that did not expressly accede to the Dennis Canon should retain ownership of the disputed real and personal property. 421 S.C. at 249, 806 S.E.2d at 102.

TEC argues that the parishes' accession to the Dennis Canon created the trust. **Assuming** that each parish acceded in writing, I would

Pleicones that reaffirmed promises of allegiance were sufficient to create a trust, Chief Justice Beatty required more; and more would be required to be consistent with his reaffirmation of *All Saints*.

The South Carolina Supreme Court had no record before it on the issue of individual parish agreement to the Dennis canon or even to the rules of TEC. It chose not to ask for the record and it did not consider the issue in a 2-2 vote. The complete trial record which shows no such agreement is before this Court and the Court should resolve this issue left open by the Collective Opinions.

VI. No Special Master is needed or required.

The issues before this Court are based on an existing record. No Special Master is required to decide the existence of any express trust to the Dennis Canon or the scope of the Collective Opinions on the issue of the Trustee's beneficiary.

VII. Conclusion

The trial record on accession to the Dennis canon, argued to but which was not before the Supreme Court, is before this Court. The Supreme Court's intent on the proper legal standard has been stated by a majority of the Collective Opinions, neutral principles of South Carolina law strictly applied. That is the law of this case. With respect to the parish issues, it is that law which must be applied to the facts of this case. The Supreme Court, when it decided, by a 2-2 vote, not

agree.

Id. at 250-51, 806 S.E.2d at 103. (emphasis added)

In my view, the Dennis Canon had no effect until acceded to in writing by the individual parishes.

Id. at 250, 806 S.E.2d at 103.

...the parishes that did not accede to the Dennis Canon cannot be divested of their property.

Id.

to consider the record, left the factual issue of parish agreement to the Dennis Canon to this Court. The intent of Chief Justice Beatty's opinion is that express agreement to the Dennis Canon in a signed writing by each individual parish is required to create a trust when strictly applying South Carolina neutral principles of trust law.

As to the Diocese, the Collective Opinions agreed that the Diocese properly disassociated. ("Disassociated Diocese") Acting Justice Pleicones and Justice Hearn, relying on a legal standard rejected by the majority, would have held the Diocese could not be the "true" Diocese because deference must be given to TEC to decide that issue. Chief Justice Beatty rejected that analysis affirming *All Saints* as the proper authority on the issue of corporate control. He would have the beneficiary of Camp St. Christopher not be the Diocese solely because of a provision in the deed for that property when it was donated to the Trustees in the 1930's, nothing more.

All of the new issues involving the identity of the Parishes and the Trustees are foreclosed by the law of the case and by the permanent injunction.

Respectfully submitted,

October 5, 2018

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