STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF DORCHESTER)	FOR THE FIRST JUDICIAL CIRCUIT
)	
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;)	Case No. 2013-CP-18-00013
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)	**PLAINTIFFS' REPLY TO**
Church of Bennettsville, Inc.;)	**DEFENDANTS' BRIEF IN**
The Church Of St. Luke and St.)	**OPPOSITION TO PLAINTIFF'S**
Paul, Radcliffeboro; The Church Of Our)	**MOTION FOR CLARIFICATION**
Saviour Of The Diocese of South Carolina;)	**AND FURTHER RELIEF**
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; TheVestry And Church)	
Wardens Of The Episcopal Church Of)	
The Parish Of St. Helena and The Parish)	
Church of St. Helena Trust; The Vestry and)	
Church Wardens Of The Episcopal Church)	
Of The Parish Of St. Matthew; The Vestry)	
and Wardens Of St. Paul's Church,)	
Summerville; Trinity Church)	
of Myrtle Beach; Trinity Episcopal Church;)	
Trinity Episcopal Church, Pinopolis; Vestry)	
and Church-Wardens Of The Episcopal)	

Church Of The Parish Of Christ Church; Vestry and Church Wardens Of The Episcopal Church Of The Parish Of St. John's, Charleston County; The Vestries and Churchwardens of the Parish of St. Andrew	)
PLAINTIFFS,	)
v.	)
The Episcopal Church (a/k/a, The Protestant Episcopal Church in the United States of America); The Episcopal Church in South Carolina	)
DEFENDANTS.	)

I. INTRODUCTION

Defendants make two arguments in their response to Plaintiffs' motion: (1) the "clear and unambiguous" mandate must be enforced. In this response[1], TEC argues it is the beneficiary of a trust on 29 parish properties and TECSC **is** the Diocese and therefore is the beneficiary of the Trustees assets. Def. Br. at 3-12; and (2) Plaintiffs have no valid due process complaints because the arguments made in their Petition for Rehearing were decided by its denial. *Id.* at 12-17. Defendants' arguments are flawed, legally and factually.

First, the Collective Opinions are anything but "clear and unambiguous". In fact, Defendants' arguments depend on the ambiguity they say does not exist. On the one hand, Defendants rely on Acting Justice Toal's dicta in the last footnote of her dissenting opinion for the argument that it is "clear and unambiguous" that certain parishes agreed to the Dennis Canon while simultaneously arguing the Court's intent is not expressed by Acting Justice Toal in that same footnote when it comes to Diocesan property.

[1] Previously, Defendants simultaneously argued that TEC had title **and** was also the beneficiary of a trust in which the parishes were the titleholders.

Second, Defendants' argument that the Supreme Court decided the issues raised in the Petition for Rehearing when it refused to grant the Petition because of a 2-2 vote is legally incorrect. It fails because of the unremarkable proposition that "nothing is settled" that is considered by a divided court. *Ohio ex rel. Eaton v. Price*, 364 U.S. 263, 264, 80 S. Ct. 1463, 1464 (1960).

I. This Court has jurisdiction to take "any action" which is consistent with the Collective Opinions.

Defendants argue not only that a mandate was issued but also that it was "clear and unambiguous". A mandate is "an order from an appellate court directing a lower court to take a specified action." *Black's Law Dictionary*, 9th ed. at 1047 (2009). The Supreme Court did not issue a mandate.

A "mandate" by an appellate court directs the lower court to take specific action. *See Prince v. Beaufort Mem'l Hosp.*, 392 S.C. 599, 605, 709 S.E.2d 122, 125 (Ct. App. 2011). In *Prince*, relied upon by the Defendants, the trial court received instructions on remand and failed to follow them. The Supreme Court reversed: "The trial court had a duty to follow the appellate court's direction." 392 SC. at 605. Similarly, in *Milton P. Demetre Family Limited Partnership v. Beckmann*, the appellate court remanded with instructions to the master in equity to determine the ownership of specified portions of real property. Instead, the master decided factual issues other than the property rights in the lots at issue, such as granting property interests to others. The Court of Appeals found that the master exceeded the mandate in reaching those issues. *Milton P. Demetre Family Ltd. P'ship v. Beckmann*, 413 S.C. 38, 52, 773 S.E.2d 596, 604 (Ct. App. 2014).

Unlike *Prince* and *Demetre*, the Collective Opinions lack any direction whatsoever and

thus require additional clarification to effect a resolution of the dispute between the parties. [2] Even if there were a specified mandate, it would only apply to matters actually decided. A lower court "cannot reconsider questions which the mandate has laid at rest… but it does not tell us what issues were laid at rest." *Federal Communications Commission v. Pottsville Broadcaster Co.,* 309 U.S. 134, 140-141, 60 S. Ct. 437, 440 (1940) *citing Sprague v. Ticonia Nat. Bank*, 307 U.S. 161, 168, 59 S. Ct. 777, 781 (1939) ("a lower court is free as to other issues").

II. The Parish Property

Defendants argue it is unambiguous that a majority held that "the parishes that acceded in writing to the Dennis Canon (in the Church's and TECSC's Constitution and Canons) hold their property in trust for the Church and TECSC." Defs. Br. at 5. [3] They then proceed to argue the Court really meant 29, not 28 parishes that acceded. *Id.* at 6.

The **law** of the case established by the majority (Chief Justice Beatty, Acting Justice Toal and Justice Kittredge), and expressed repeatedly in Chief Justice Beatty's opinion is that a trust is only created if an individual parish, in a signed writing, agreed ("acceded") to the Dennis Canon. That is what Chief Justice Beatty held *All Saints* requires; not an agreement to the rules of TEC. [4] The **factual** issue of which parishes *did not* agree was resolved based on Defendants' admissions.

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[2] It is irrelevant that the Supreme Court remitted, rather than remanded, the case to this Court. (Mem. in Opp. Mot. Clarification at p. 4.) Under well-established South Carolina law, even where a case is not "remanded," the return of the remittitur to the circuit court re-vests the circuit court with jurisdiction to hear motions seeking further consistent relief. *Moore v. N. Am. Van Lines*, 319 S.C. 446, 448, 462 S.E.2d 275, 276 (1995); *see also Martin v. Paradise Cove Marina, Inc.*, 348 S.C. 379, 385, 559 S.E.2d 348, 352 (Ct. App. 2001) (reversing circuit court order that dismiss case for lack of subject matter jurisdiction because the matter was remitted rather than remanded, holding that it was a distinction is without a difference).

[3] The quote Defendants rely upon from Acting Justice Toal's dissent says nothing about TECSC having an interest in Parish property. *Id.*

[4] He did not hold that a written, signed agreement to the Dennis Canon is the equivalent of one to "the Church's and TECSC's Constitution and Canons;" an addition newly added to Defendants' arguments.

The **factual** issue of which parishes, if any, *did* agree is unresolved because there was no record before the Supreme Court on this issue.[5]

The existence of the "28 or 29 parishes" question is an example of the fact that it was Defendants' admission that decided the factual issue of which parishes did not agree, not the record. Defendants counsels' argument in their summary (the only "record" before the Supreme Court) leaves out the following plaintiff in its list of alleged "acceders": "The Vestries and Church Wardens of The Parish of St. Andrew". Counsel also left out "St. Andrews Church-Mt. Pleasant Land Trust." [6] Acting Justice Toal's footnote, *Id*. at 265, n. 49, 806 S.E.2d. at 111, n. 49, lists the eight relying on the admissions from Defendants' summary. Included in her list are "St. Andrew's Church – Mt. Pleasant Land Trust" and "The Parish of St. Andrew, Mt. Pleasant." As the caption to the Collective Opinions shows, there is no "Parish of St. Andrew, Mt. Pleasant" but there is a "…Parish of St. Andrew." Defendants' explanation, that this is an additional name for St. Andrews Mt. Pleasant, is found nowhere in the Collective Opinions. Having omitted "The Vestries and Church wardens of The Parish of St. Andrew" from their summary, this issue should be resolved. What is highlighted here is that the trial record was not before the Supreme Court, so there could not have been a factual finding as to the remaining 28 solely from the arguments of counsel.

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[5] Chief Justice Beatty did not join in Acting Justice Toal's dissenting opinion, nor did any other Justice for that matter. This means Acting Justice Toal's opinion has no efficacy as precedent. *See* generally, *People v. Byrd*, 108 Cal. Rptr 2d 243, 89 Cal.App.4th 1373 (2001) (even concurring opinion has no precedential value on points as to which there is no agreement by a majority of the court). Moreover, in stating that she would have voted to grant rehearing, Acting Justice Toal recognized that the Collective Opinions gave rise to great uncertainty and would lead to additional litigation. (Order Den. Mot. Recuse at p.4 (Toal, A.J.).) Acting Justice Toal's footnote in her dissent thus cannot be construed to be a mandate of the Collective Opinions preventing this Court from finding which parishes expressly acceded to the Dennis Canon, as is required to effectuate Chief Justice Beatty's opinion.

[6] The footnote of Justice Hearn relied upon by Defendants (Def. Br. at 6) says nothing about those names.

III. The "identity" of the Diocese was not an issue before Judge Goodstein, was not appealed and was not an issue before the Supreme Court.

In recognition of the latent ambiguity which permeates the Collective Opinions, Defendants now raise a new issue not tried and not appealed but which they perceive to be arguable based on a sentence in a footnote from Chief Justice Beatty's opinion. 421 S.C. at 251, n.29, 806 S.E.2d at 103, n. 29.

The trial court found in 84 findings of fact that the Protestant Episcopal Church in the Diocese of South Carolina was who it claimed to be with all of its names, marks and property ownership intact after it disassociated from TEC in 2012. It entered a permanent injunction against anyone else's use of its name and marks. One basis of the injunction was not appealed and is now the law of the case. The other was affirmed because of an evenly divided court on the issue. Neither Defendant appealed any specific finding with respect to the Diocese's history or existence. The appellate issue, like the one in the trial court, was who had the right to control the Diocese; those who presently controlled it or those whom TEC asserted, on principles of deference, it chose: The Episcopal Church in South Carolina. The trial court found that the Diocese was not controlled by TECSC for two reasons: (1) the issue of corporate control was determined, as in *All Saints,* by neutral principles of corporate law and, (2) those in control had followed the proper procedures under those neutral principles to disassociate from TEC. The second point was not contested on appeal by Defendants and it is now the law of this case. While two justices would have deferred, using deference principles, to TEC's determination of the "true diocese", this legal standard was rejected by a majority of the court (J. Kittredge, A.J. Toal and C.J. Beatty).

The Supreme Court (C.J. Beatty, A.J. Toal, J. Kittredge) rejected the legal standard that

would allow TEC to decide, under a deference standard, who was the "true diocese". They did so just as they did in *All Saints* when they rejected the argument that TEC could decide who was the "true vestry." The issue was determined by who had the right to corporate control under neutral principles of corporate law. Therefore, Justice Beatty's footnote, *at best*, could only be an interpretation of the intended beneficiary of Camp St. Christopher based on its deed. Plaintiffs do not concede, however, that the issue of Camp St. Christopher status was decided by this footnote. That is because this issue was never presented to nor was it ruled upon by the trial court. The words "Camp St. Christopher" appear nowhere in her 46 page Final Order. Furthermore, they scarcely appear in the entire 2,593 pages of trial testimony. The only evidence is where the deed was introduced noting that it made no reference to TEC as the beneficiary of the Camp. Tr. at 62, 273. The trial court was never asked to determine the beneficiary of the Camp's deed and did not do so.

Defendants elaborate argument to secure an interpretation from this Court, made possible only by the ambiguity of the Chief Justice's footnote, is foreclosed to it. Neutral principles is the controlling legal standard. Under that standard it is undisputed the Diocese successfully withdrew and its names and marks continue to be protected by a permanent injunction.

IV. The Supreme Court's evenly divided refusal to hear the Petition for Rehearing did not decide the issues the Petition raised.

Defendants argue that the Supreme Court "clear[ly]" "decided" the arguments raised in the Petition for Rehearing. Def. Br. at 12,14,17. The entirety of Defendants' argument, pages 12 to 18, depends on the answer to one legal question: "What is the effect of a divided court on the issues before that court?"

It is universally recognized that issues presented to an evenly divided court are not "decided". In most circumstances, the decision of a lower court is affirmed because it cannot be

reversed. However, such an affirmance, is not a decision on the issues presented to the appellate court. As stated by Chief Justice Marshall as early as 1826, in a case where the Supreme Court was evenly divided after oral argument, "the principles of law which have been argued cannot be settled, but the judgment is affirmed, the court being divided in opinion upon it." *Etting v. Bank of United States*, 24 U.S. 59, 78 (1826). *Accord, Durant v. Essex Co., 7 Wall*. 107, 112 (1869)(" if the judges are divided…no order can be made."); *Ohio ex. Rel. Eaton v. Price*, 364 U.S. 263, 264, 80 S. Ct. 1463, 1464 (1960) (the order being reviewed is affirmed "ex necessitate, by an equally divided court" with no expression of opinion "for such an expression is unnecessary where nothing is settled."); *Neil v. Biggers*, 409 U.S. 188, 192, 93 S.Ct. 375, 378-279 (1972) *referencing* the "thoughtful opinion" of the 2nd Circuit in *United States ex rel. Radich v. Criminal Ct. of City of New York*, 459 F.2d 745, 750 (2nd Cir. 1972)("Because of the very fact of its equal division, however, the Court has been unable to reach a decision on the merits and there has therefore been no adjudication of them by it.").

This is obvious from the Supreme Court's actions here. Half the court noted that the failure to appoint a fifth justice had "blocked review" of the issues raised in the Petition for Rehearing. The Supreme Court then left in place the August 2, 2017 opinion. The Court did not decide, much less reject, the arguments raised in the Petition for Rehearing because it was equally divided on whether it should hear them at all.

Accordingly, there was no hearing allowed on these issues. If, as Defendants urge, there is no consideration by this Court of the new issues created by the Collective Opinions and raised in the Petition, there would be the same denial of due process found by Justice Brandeis in *Brinkerhoff- Faris Trust & Savings Co. v. Hill*, 281 U.S. 673, 50 S.Ct. 451 (1930) as discussed in Plaintiffs' Memorandum in Support of Motion for Clarification and other Relief at 13-14.

However, the due process issue is resolved if this Court determines the issues before it on their merits.

V. Conclusion

Defendants embrace a footnote in the dissenting opinion of Acting Justice Toal as the correct interpretation of what the majority held on the issue of TEC's interest in parish property but steadfastly avoid it on the issue of what the majority held with respect to Diocese's property. On both issues, Acting Justice Toal's interpretation of what the majority ruled is dicta.

The Supreme Court reaffirmed the legal principles expressed in *All Saints*: corporate control of the plaintiffs is determined by applying neutral principles of South Carolina corporate law. It is undisputed that the Plaintiffs followed all the proper steps to withdraw from TEC with their corporate identity and all their real and personal property ownership intact excepting only such property that may be affected by the one remaining issue: which parishes, if any, agreed in a signed writing to the Dennis Canon.

As to the Diocese, to now suggest, under the cover of the ambiguity present in the Collective Opinions, that the Diocese is not the same entity that successfully withdrew flies in the face, not only of the failure of this issue to be raised to trial court, but also of the fact that it is the Diocese alone who can use its names and marks. Neither TEC nor TECSC can because they are not the Diocese.

It is respectfully submitted that the Court should hear this matter as soon as it is able. It should determine which, if any, of the 28 parishes not mentioned by the Supreme Court agreed in a signed writing to the Dennis Canon based on the existing trial record. It should also determine the ambiguity, if any, presented by Chief Justice Beatty's footnote. The issues before this Court can be determined applying the law of the case, considering the trial record which is before this

Court and the Collective Opinions.

Respectfully submitted,

October 12, 2018

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