

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

Jun 27 2022

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2020-000986

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; Saint Luke's Church, Hilton Head; St. Bartholomew's Episcopal Church; St. David's 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 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,

Respondents,

v.

The Episcopal Church (a/k/a, The Protestant Episcopal Church in the United States of America); The Episcopal Church in South Carolina,

Appellants.

PROOF OF SERVICE

The undersigned certifies that this 27th day of June, 2022, she caused to be served a copy of the **REPLY OF CHURCH OF THE HOLY COMFORTER** via electronic mail addressed to counsel of record:

Mary E. Kostel, Esq.
Chancellor to the Presiding Bishop
THE EPISCOPAL CHURCH
3737 Seminary Road PMB 200
Alexandria, VA 22304
mkostel@episcopalchurch.org
Attorney for The Episcopal Church

Allan R. Holmes, Sr., Esquire
GIBBS & HOLMES
Suite 110, 171 Church Street
Charleston, SC 29401
aholmes@gibbs-holmes.com
Attorney for The Episcopal Church

Thomas S. Tisdale, Jr., Esq.
LAW OFFICES OF THOMAS S. TISDALE, LLC
4 North Atlantic Wharf, Suite 100
Charleston, SC 29401
tst@chancellorsc.com
Attorney for The Episcopal Church in South Carolina

Kathleen Fowler Monoc, Esq.
MONOC LAW LLC
77 Grove Street
Charleston, SC 29403
katie@monoroberts.com
Attorney for The Episcopal Church in South Carolina

Bert Glenn Utsey, III, Esq.
CLAWSON FARGNOLI UTSEY, LLC
2 Amherst Street
Charleston, SC 29403
bert@cfulaw.com; hilda@fulaw.com
Attorney for The Episcopal Church in South Carolina

Kathleen Chewning Barnes, Esq.
BARNES LAW FIRM, LLC
PO Box 897
Hampton, SC 29924
kbarnes@barneslawfirmssc.com
Attorney for The Episcopal Church in South Carolina

C. Pierce Campbell, Esq.
TURNER, PADGET, GRAHAM & LANEY
319 South Irby Street, P.O. Box 5478
Florence, SC 29501
pcampbell@turnerpadget.com
*Attorneys for All Saints Protestant Episcopal Church, Inc, St. Bartholomews Episcopal Church,
Church of the Holy Cross*

Thomas C. Davis, Esq.
HARVEY & BATTEY, PA
1001 Craven Street
Beaufort, SC 29901
tdavis@harveyandbattey.com
Attorneys for Christ St. Paul's Episcopal Church

I. Keith McCarty, Esq.
McCARTY LAW FIRM, LLC
P.O. Box 30055
Charleston, SC 29417
ikeithmccarty@gmail.com
Attorneys for Christ St. Paul's Episcopal Church

C. Alan Runyan, Esq.
Andrew S. Platte, Esq.
RUNYAN & PLATTE, LLC
2015 Boundary Street, Suite 239
Beaufort, SC 29902
arunyan@runyanplatte.com; aplatte@runyanplatte.com
*Attorneys for Protestant Episcopal Church In The Diocese Of South Carolina, Church Of The
Cross, Inc. and Church Of The Cross Declaration of Trust, Church Of Our Savior, Of The
Diocese of South Carolina, Protestant Episcopal Church, Parish Of Saint Phillip, Protestant
Episcopal Church, Parish Of Saint Michael, In, Vestry/Wardens-Episcopal/St Helena/St.
Helena Trust, St. David's Church, Vestry/ Wardens-Episcopal/Parish of St. John's Chas Cty,
Church of the Epiphany (Episcopal), Trinity Episcopal Church, Edisto Island, Vestry/Wardens
– Episcopal Church/St. Jude's of Walterboro*

Robert R. Horger, Esq.
HORGER, BARNWELL & REID, LLP
P.O. Drawer 329
1459 Amelia Street
Orangeburg, SC 29115
rhorger@hbrllp.com
Attorneys for Church of The Redeemer

William A. Scott, Esq.
PEDERSEN & SCOTT, PC
775 St. Andrews Blvd.
Charleston, SC 29407
bscott@pslawpc.com
Attorney for Holy Trinity Episcopal Church

Henrietta U. Golding, Esq.
BURR FORMAN & McNAIR
P.O. Box 336
Myrtle Beach, SC 29578
hgolding@burr.com
Attorneys for Protestant Episcopal Church in The Diocese Of South Carolina, Saint Luke's Church, Hilton Head, Trustees of Protestant Episcopal Church in the Diocese of SC

Harry Easterling, Jr., Esq.
120 North Liberty Street
Post Office Box 611
Bennettsville, SC 29512
hreasterling@gmail.com
Attorneys for St. Davids Church, St. Paul's Episcopal Church/Bennettsville, Inc

Mark V. Evans, Esq.
147 Wappoo Creek Drive, Ste. 202
Charleston, SC 29412
mevans14@bellsouth.net
Attorneys for St James' Church, James Island, S. C.

David L. DeVane, Esq.
110 N. Main Street
Summerville, SC 29483
david@devanemacklaw.com
Attorney for Church Of St. Luke and St. Paul, Radcliffeboro

David B. Marvel, Esq.
DAVID B. MARVEL, LLC
P.O. Box 22734
Charleston, SC 29413
dave@marvel.lawyer
Attorney for Church of St. Luke and St. Paul, Radcliffeboro

John Furman Wall, Esq.
140 Wando Reach Court
Mt. Pleasant, SC 29464
walljohn@bellsouth.net
Attorney for Church Of The Good Shepherd, Charleston, SC

William A. Bryan, Esq.
BRYAN & HAAR
P.O. Box 14860
Surfside Beach, SC 29587
billbryan@bryanandhaar.net
Attorneys for Church of the Resurrection, Surfside

Charles H. Williams, Esq.
WILLIAMS & WILLIAMS
P.O. Box 1084
Orangeburg, SC 29116-1084
chwilliams@williamsattys.com
Attorneys for Protestant Episcopal Church In The Diocese Of South Carolina, Trustees of Protestant Episcopal Church in the Diocese of SC

C. Mitchell Brown, Esq.
NELSON, MULLINS, RILEY & SCARBOROUGH
1320 Main Street, 17th Floor
Post Office Box 11070
Columbia, SC 29211-1070
mitch.brown@nelsonmullins.com
Attorneys for 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

W. Foster Gaillard, Esq.
WOMBLE BOND DICKINSON (US) LLP
P.O. Box 999
Charleston, SC 29402
foster.gaillard@wbd-us.com
Attorneys for Protestant Epis.Ch, Parish of Saint Phillip

G. Mark Phillips, Esq.
NELSON, MULLINS, RILEY & SCARBOROUGH, LLP
Liberty Center, Suite 600
151 Meeting Street
Charleston, SC 29401-2239
mark.phillips@nelsonmullins.com
Attorneys for Protestant Epis.Ch, Parish of Saint Phillip

Henry E. Grimball, Esq.
WOMBLE Bond Dickison (US) LLP
P.O. Box 999
Charleston, SC 29402
henry.grimball@wbd-us.com
Attorneys 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

Francis M. Mack, Esq.
656 Fort Motte Road
Saint Matthews, SC 29135
fmmack@windstream.net
Attorney for Vestry/Wardens – Episcopal Church/St. Matthews Parish

Peter Brandt Shelbourne, Esq.
SHELBOURNE LAW FIRM
131 E. Richardson Avenue
Summerville, SC 29483
brandt@shelbournelaw.com
Attorneys for Vestry/Wardens - St. Paul's Church, Summerville, Trinity Episcopal Church, Pinopolis

John B. Williams, Esquire
WILLIAMS & HIJLST, LLC
209 East Main Street
Monks Corner, SC 29461
jbw@williamsandhulst.com
Attorneys for Trinity Episcopal Church, Pinopolis

James Kent Lehman, Esquire
PO Box 11070
Columbia, SC 29211
jim.lehman@nelsonmullins.com
Attorney for Trinity Church of Myrtle Beach

Susan MacDonald, Esq.
NELSON, MULLINS, RILEY & SCARBOROUGH, LLP
BNC Bank Corporate Center, Suite 300
3751 Robert M. Grissom Parkway
Myrtle Beach, SC 29577
susan.macdonald@nelsonmullins.com
Attorneys for Trinity Church of Myrtle Beach

John B. Williams, Esquire
WILLIAMS & HULST, LLC
209 East Main Street
Moncks Comer, SC 29461
jbw@williamsandhulst.com
Attorneys for Trinity Episcopal Church, Pinopolis

Allan P. Sloan, III, Esq.
PIERCE, SLOAN, WILSON, KENNEDY & EARLY, LLC
321 East Bay Street; P.O. Box 22437
Charleston, SC 29413
chipsloan@piercesloan.com
Attorneys for Vestry/Wardens/Epis. Church/Parish of Christ

Bruce W. Bannister, Esq.
BANNISTER, WYATT & STALVEY, LLC
P. O. Box 10007
Greenville, South Carolina 29603
bbannister@bannisterwyatt.com
Attorneys for Vestry/Wardens/Epis. Church/Parish of Christ

Joseph C. Wilson, IV, Esq.
JOSEPH C., WILSON LAW FIRM, LLC
PO Box 178
Folly Beach, SC 29439
jcamwilsoniv@gmail.com
Attorneys for Vestry/Wardens/Epis. Church/Parish of Christ

Edward P. Guerard, Jr.
1106 Port Harbor Court
Mt. Pleasant, SC 29464
tguerardjr@gmail.com
Attorneys for Vestry/Wardens/Epis. Church/Parish of Christ

SOWELL & DuRANT, LLC

By: s/Bess J. DuRant

Thornwell F. Sowell III, SC Bar No. 5197
Bess J. DuRant, SC Bar No. 77920
1325 Park Street, Suite 100
Columbia, South Carolina 29201
(803) 722-1100
bsowell@sowelldurant.com
bdurant@sowelldurant.com

Attorneys for Church of the Holy Comforter

Columbia, South Carolina
June 27, 2022

Amy Kelly

From: Amy Kelly
Sent: Monday, June 27, 2022 3:26 PM
To: FMMack@windstream.net; pcampbell@turnerpadget.com; Allan Sloan; tdavis@harveyandbattey.com; arunyan@runyanplatte.com; Andrew Platte; susan.macdonald@nelsonmullins.com; walljohn@bellsouth.net; mark.phillips@nelsonmullins.com; mevans14@bellsouth.net; jim.lehman@nelsonmullins.com; bscott@pslawpc.com; david@devanemacklaw.com; dave@marvel.lawyer; henry.grimball@wbd-us.com; brandt@shelbournelaw.com; chwilliams@williamsattys.com; HGolding@burr.com; rhorger@hbrllp.com; jcamwilsoniv@gmail.com; ikeithmccarty@gmail.com; hreasterling@gmail.com; Foster.Gaillard@wbd-us.com; tguerardjr@gmail.com; mitch.brown@nelsonmullins.com; BillBryan@bryanandhaar.net; jbw@williamsandhulst.com; bbannister@bannisterwyatt.com; tst@chancellorsc.com; katie@monocroberts.com; kbarnes@barneslawfirmssc.com; aholmes@gibbs-holmes.com; mkostel@episcopalchurch.org; bert@cfulaw.com; hilda@cfulaw.com
Cc: Biff Sowell; Bess DuRant
Subject: Reply of Church of the Holy Comforter- The Protestant Episcopal Church in the Diocese of South Carolina, et al v. The Episcopal Church, et al - Appellate Case No. 2020-000986
Attachments: Church of the Holy Comforter Reply to Return to Petitions for Rehearing.pdf; Proof of Service- Holy Comforter - Reply.pdf

Counsel,

Attached for service upon you in the above matter is the Reply of Church of the Holy Comforter. Service is made via email pursuant to the Supreme Court Order 2021-08-25-02 as amended May 6, 2022.

Thank you,
Amy Kelly

Amy A. Kelly
Director of Administration/Paralegal, SOWELL + DuRANT

1325 Park Street, Suite 100
Columbia, SC 29201

803.722.1100 | sowelldurant.com

NOTICE: This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you receive this message in error, please delete this message from your device. Sowell & DuRant, LLC is a South Carolina limited liability company.