

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; Christ)
The King, Waccamaw; 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; Saint)
Matthews Church; St. Bartholomews)
Episcopal Church; St. Davids Church;)
St. James' Church, James Island, S.C.; St.)
John's Episcopal Church of Florence, S.C.;)
St. Matthias Episcopal Church, Inc.; St.)
Paul's Episcopal Church of Bennettsville;)
Inc.; St. Paul's Episcopal Church of Conway;)
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 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 Prince George Winyah; 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.)
Mathew; The Vestry and Church Wardens)
Of The Episcopal Church Of The Parish Of)

IN THE COURT OF COMMON PLEAS
FOR THE FIRST JUDICIAL CIRCUIT

FILED - RECORD
2013 JAN 22 AM 10:23
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DORCHESTER COUNTY

Case No. 2013-CP-18-00013

**FIRST AMENDED COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF (VERIFIED)**

St. Andrew's Church, Mount Pleasant; The)
Vestry and Wardens Of St. Paul's Church,)
Summerville; Trinity Church of Myrtle)
Beach; Trinity Episcopal Church; 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)

PLAINTIFFS,)

v.)

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

DEFENDANT.)

Plaintiffs, through their respective undersigned counsel, bring this action against the Defendant seeking a declaratory judgment pursuant to §§ 15-53-10 *et. seq.* of the South Carolina Code of Laws (1976) that they are the sole owners of their respective real and personal property in which the Defendant has no legal, beneficial or equitable interest. The Plaintiffs (except for St. Andrew's Church, Mount Pleasant) also seek a declaratory judgment that the Defendant and those under its control have improperly used and may not continue to use any of the names, styles, seals and emblems of any of the Plaintiffs or any imitations or substantially similar names, styles, seals and emblems and that the Court enter injunctions prohibiting the Defendant and those under its control from such uses pursuant to §§ 39-15-1105 *et. seq.* and §§ 16-17-310 and 320 of the South Carolina Code of Laws (1976).

In support of these claims, Plaintiffs allege as follows:

PLAINTIFFS

The Protestant Episcopal Church in The Diocese of South Carolina