

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. Andrews Church-Mt. )  
 Pleasant and The St. Andrews Church-Mt. )  
 Pleasant Land Trust; 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 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 Prince George Winyah; The )  
 Vestry And Church Wardens Of The )  
 Episcopal Church Of The Parish Of St. )

IN THE COURT OF COMMON PLEAS  
 FOR THE FIRST JUDICIAL CIRCUIT

Case No. 2013-CP-18-00013

**SECOND AMENDED COMPLAINT  
 FOR DECLARATORY AND  
 INJUNCTIVE RELIEF**

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 CHRISTIAN COUNTY  
*Christy A. Johnson*

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 )

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. )

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, The Episcopal Church ("TEC") has no legal, beneficial or equitable interest. The Plaintiffs (except for St. Andrew's Church, Mount Pleasant) also seek a declaratory judgment that the Defendants and those under their 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 Defendants and those under their 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: