

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Case No. 2013-CP-18-00013

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. Pauls' 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; St. Matthews Church; St. Andrews Church-Mt. Pleasant and The St. Andrews Church-Mt. Pleasant Land Trust; St. Bartholomews Episcopal Church; St. James' Church, James Island; St. John's Episcopal Church of Florence, S.C.; St. Mathias Episcopal Church, 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. Helena and The Parish Church of St. Helena Trust; The Vestry and Church Wardens 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; and the Vestries and Churchwardens of the Parish of St. Andrew, Plaintiffs,

Of which 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 are the Respondents,

v.

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

Of which The Episcopal Church in South Carolina is the Appellant.

**RULE 240, SCACR, DOCUMENTS IN SUPPORT OF
THE EPISCOPAL CHURCH IN SOUTH CAROLINA'S
PETITION FOR REHEARING OF THE ORDER DISMISSING THE APPEAL**

HELLMAN YATES & TISDALE, PA

Thomas S. Tisdale
tst@hellmanyates.com
SC Bar # 005584
Jason S. Smith
js@hellmanyates.com
SC Bar # 80700
105 Broad Street, Third Floor
Charleston, SC 29401
(843) 266-9099
(843) 266-9188 (facsimile)

ATTORNEYS FOR APPELLANT
THE EPISCOPAL CHURCH IN SOUTH
CAROLINA

TABLE OF CONTENTS

1. Respondents' Complaint
2. Appellant's Answer and Counterclaims
3. Appellant's First Request for Production of Documents
4. Respondents' Responses to Appellant's First Request for Production of Documents
5. Respondents' Privilege Log
6. Appellant's Notice of Motion and Motion to Compel Production of Documents
7. Affidavit of C. Alan Runyan
8. Appellant's Memorandum in Support of Motion to Compel Production of Documents
9. Letter from Appellant's Counsel to Judge Goodstein dated October 22, 2013 (attaching Respondents' Documents Bates No.: DSC-313-01474 - 01476; -01482; -01508 - 01510)
10. Letter from Respondents' Counsel to Judge Goodstein dated October 23, 2013
11. Order Denying Appellant's Motion to Compel
12. Appellant's Motion for Reconsideration
13. Order Denying Appellant's Motion for Reconsideration
14. Transcript of Hearing on Appellant's Motion to Compel dated October 11, 2013 (pgs. 1; 12-38)
15. Order Granting Respondents' Motion to Dismiss the Appeal