

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Diane S. Goodstein
Circuit Court Judge

Case No. 2013-CP-18-00013

Appellate Case No.: 2014-001377

The Protestant Episcopal Church in the Diocese of South Carolina;
The Trustees of the Protestant Church in South Carolina, a South Carolina
Corporate Body; et al., Respondents,

v.

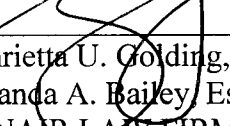
The Episcopal Church (a/k/a, The Protestant Episcopal Church in the United
States of America); The Episcopal Church in South Carolina,

Of whom The Episcopal Church in South Carolina is theAppellant.

MOTION TO ASSESS COSTS

Respondents, 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 now moves pursuant to Rule 222 and 242(j),
SCACR, for assessment of costs against the Appellant, The Episcopal Church in
South Carolina in the matter. A sworn, itemized statement of the recoverable costs
incurred in this matter accompanies this motion.

MCNAIR LAW FIRM, P.A.

By: 
Henrietta U. Golding, Esq. SC Bar#02173
Amanda A. Bailey Esq. SC Bar#71085
MCNAIR LAW FIRM

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AUG 26 2014

SC Court of Appeals

P.O. Box 336
Myrtle Beach, SC 29578
(843) 444-1107
Attorneys for the Respondents
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

Myrtle Beach, South Carolina

August 25, 2014

THE STATE OF SOUTH CAROLINA
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v.

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

Of whom The Episcopal Church in South Carolina is theAppellant.

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ITEMIZED STATEMENT OF COSTS

SC Court of Appeals

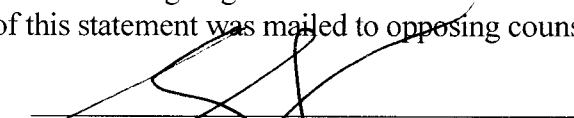
The Appellate Court Clerk is requested to tax the following costs against the Appellant
The Episcopal Church in South Carolina:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Attorney's Fee Provided By Rule 222(b), SCACR			\$1,000.00	
Other (specify and explain): Cost of Filing Motion to Dismiss Appeal and Copying Costs	780 pages	.10 cents	\$ 25.00 filing fee \$ 78.00 printing	

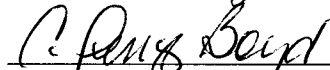
		TOTAL	\$ 1,103.00	\$

I, Amanda A. Bailey, do swear that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was mailed to opposing counsel.

Dated: August 25th, 2014


 Henrietta U. Golding, Esq. SC Bar#02173
 Amanda A. Bailey, Esq. SC Bar#71085
 McNAIR LAW FIRM
 P.O. Box 336
 Myrtle Beach, SC 29578
 (843) 444-1107
 Attorneys for Respondents
 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

SWORN to before me this
25th day of August, 2014

 (L.S.)
 Notary Public for South Carolina
 My Commission expires: 4-27-2022

Approved: _____
 Clerk

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v.

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

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

PROOF OF SERVICE

I, Carole Koerner, an employee of McNair Law Firm, P.A., attorneys for the
Respondents, The Protestant Episcopal Church in the Diocese of South Carolina, and The
Trustees of the Protestant Episcopal Church in South Carolina, do hereby certify that I have
served a copy of Respondents' Motion to Assess Costs with attached Itemized Statement of
Costs and Proof of Service to counsel of record, on this the 25th day of August, 2014, via email
communication and/or U.S. Mail first class postage prepaid and via email as indicated below:

Addressee(s): Counsel of Record

**VIA U.S. MAIL FIRST CLASS
POSTAGE PREPAID**

Counsel for Appellant:

Thomas S. Tisdale, Jr., Esquire
Jason S. Smith, Esquire
Hellman Yates & Tisdale
King & Queen Building
145 King Street, Suite 102
Charleston, SC 29401

tst@hellmanyates.com

js@hellmanyates.com

andrea.st.amand@hotmail.com

David Booth Beers, Esquire
Mary E. Kostel, Esquire
Goodwin Procter LLP
901 New York Avenue N.W.
Washington, D.C. 20001

Attorneys for The Episcopal Church; and The
Episcopal Church in South Carolina

dbeers@goodwinprocter.com
mkostel@goodwinprocter.com

Allan R. Holmes, Esquire
Timothy Lewis, Esquire
Gills & Holmes
Post Office Box 938
Charleston, SC 29402-0938

Attorneys for The Episcopal Church

aholmes@gibbs-holmes.com
timolewis@gibbs-holmes.com

Counsel of Record:
(VIA EMAIL ONLY)

C. Alan Runyan, Esquire
Andrew S. Platte, Esquire
Speights & Runyan
2015 Boundary Street, Suite 239
Beaufort, South Carolina 29902
(803) 943-4444

Church of The Cross, Inc. and Church of
the Cross Declaration of Trust

The Church of Our Saviour, of the Diocese
of South Carolina

Email: arunyan@speightsrunyan.com
aplatte@speightsrunyan.com

The Protestant Episcopal Church, of the
Parish of Saint Philip, in Charleston 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

Trinity Episcopal Church, Edisto Island

Vestry and Church Wardens of the
Episcopal Church of the Parish of St.
John's Charleston County

Vestry and Church Wardens of St. Jude's
Church of Walterboro

Parish of St. Andrew

Old Saint Andrews Parish Church

C. Mitchell Brown, Esquire
Nelson Mullins Riley & Scarborough
1320 Main Street
Columbia, SC 29201
(803) 255-9595
Email: mitch.brown@nelsonmullins.com

Charles H. Williams, Esquire
Williams & Williams
P.O. Box 1084
Orangeburg, S C 29116-1084
(803) 534-5218
Email: chwilliams@williamsattys.com

David Cox, Esquire
Womble, Carlyle, Sandridge & Rice, LLP
P. O. Box 999
Charleston, South Carolina 29402
(843) 722-3400

The Protestant Episcopal Church in the
Diocese of South Carolina
AND
The Trustees of The Protestant Episcopal
Church in South Carolina, A South
Carolina Corporate Body

The Protestant Episcopal Church in the
Diocese of South Carolina
AND
The Trustees of The Protestant Episcopal
Church in South Carolina, A South

Email: dcox@wcsr.com

Carolina Corporate Body

Thomas Davis, Esquire
Harvey & Battey, PA
1001 Craven Street
Beaufort, South Carolina 29901
(843) 524-3109
Email: tadavis@harveyandbattey.com

The Protestant Episcopal Church in the
Diocese of South Carolina AND

The Trustees of The Protestant Episcopal
Church in South Carolina, A South
Carolina Corporate Body

C. Pierce Campbell, Esquire
Turner, Padgett, Graham & Laney
319 South Irby Street
P.O. Box 5478
Florence, South Carolina 29501
(843) 662-9008
Email: pcampbell@turnerpadgett.com

All Saints Protestant Episcopal Church,
Inc.

St. Bartholomews Episcopal Church

The Church of the Holy Cross

I. Keith McCarty, Esquire
McCarty Law Firm, LLC
1212 Wappoo Road
P. O. Box 30055
Charleston, South Carolina 29417
(843) 793-1272
Email: ikeithmccarty@gmail.com

Christ St. Paul's Episcopal Church

Harry A. Oxner, Esquire
Oxner & Stacy
235 Church Street
Georgetown, South Carolina 29440
(843) 527-8020
Email: oxhat@aol.com

Christ the King Waccamaw

The Vestry and Church Wardens of The
Episcopal Church of the Parish Of Prince
George Winyah

Thornwell F. Sowell, III (Biff)
Bess J. DuRant (803) 231-7832
Sowell Gray Stepp & Laffitte, LLC
P. O. Box 11449
Columbia, South Carolina 29211
(803) 929-1400
Email: bsowell@sowellgray.com
bdurant@sowellgray.com

Church of the Holy Comforter

Robert R. Horger, Esquire

Church of The Redeemer

Horger, Barnwell & Reid, LLP
P. O. Drawer 329
1459 Amelia Street
Orangeburg, South Carolina 29115
(803) 531-3000
Email: rhorger@hbrllp.com

William A. Scott, Esquire
Rogers Townsend & Thomas PC
775 St. Andrews Blvd.
Charleston, SC 29407
(843) 556-5656
Email: bill.cscott@rtt-law.com;
bscott@rtt-law.com

Dane Sowinski, Esquire
Rogers Townsend & Thomas PC
775 St. Andrews Blvd.
Charleston, SC 29407
Email: dane.sowinski@rtt-law.com

Lawrence B. Orr, Esquire
Orr Elmore & Ervin, LLC
P. O. Box 2527
Florence, South Carolina 29503
(843) 667-6613
Fax: (843) 667-0340
Email: lbo@orrfirm.com

Saunders M. Bridges, Jr., Esquire
Aiken Bridges Elliott Tyler & Saleeby
P. O. Drawer 1931
181 E. Evans Street, Suite 409
Florence, South Carolina 29503
(843) 669-8787
Email: smb@aikenbridges.com

Harry Easterling Jr., Esquire
Goldberg & Easterling, P.A.
116 North Liberty Street
Bennettsville, South Carolina 29512
(843) 479-2878
Email: gandelaw@bellsouth.net

Mark Evans, Esquire
147 Wappoo Creek Dr., Ste. 202

Holy Trinity Episcopal Church

Saint Matthews Church

St. John's Episcopal Church of Florence,
South Carolina

St. John's Episcopal Church of Florence,
South Carolina

St. David's Church

St. Paul's Episcopal Church of
Bennettsville, Inc.

St. James Church James Island, South
Carolina

Charleston, South Carolina 29412
(843) 762-6640
Email: mevans14@bellsouth.net

Stephen S. McKenzie, Esquire
Coffey, Chandler & Kent, P.A.
8 South Brooks Street
Manning, South Carolina 29102
(803) 435-8847
Fax: (803) 435-8915
Email: steve@cckmlaw.com

Robert S. Shelton, Esquire
Bellamy Law Firm
1000 29th Avenue North
Myrtle Beach, South Carolina 29577
(843) 448-2400
Email: rshelton@bellamylaw.com

David B. Marvel, Esquire
Prenner Marvel, P.A.
636 King Street
Charleston, South Carolina 29403
(843) 722-7250
Email: dave@prennermarvel.com

David L. DeVane, Esquire
110 N. Main Street
Summerville, South Carolina 29483
(843) 285-7100
Email: david@attorneyscharleston.com

John Furman Wall, III, Esquire
140 Wando Reach Court
Mount Pleasant, SC 29462
(843) 408-3411
Email: walljohn@bellsouth.net

William A. Bryan, Esquire
Bryan & Haar
508 Highway 17 Business South
Suite B
Surfside Beach, South Carolina 29587
(843) 288-3461
Email: billbryan@bryanandhaar.net

St. Matthias Episcopal Church, Inc.

The Church of the Epiphany (Episcopal)

St. Paul's Episcopal Church of Conway

The Church of St. Luke and St. Paul,
Radcliffeboro

The Church of the Good Shepherd,
Charleston, South Carolina

The Church of the Resurrection, Surfside

G. Mark Phillips, Esquire
Nelson Mullins Riley & Scarborough, LLP
Liberty Center, Suite 600
151 Meeting Street
Charleston, South Carolina 29401-2239
(843) 720-4383
Email: mark.phillips@nelsonmullins.com

The Protestant Episcopal Church, of the
Parish of Saint Philip, in Charleston South
Carolina

W. Foster Gaillard, Esquire
Womble, Carlyle, Sandridge & Rice, LLP
P. O. Box 999
Charleston, South Carolina 29402
(843) 722-3400
Email: fgaillard@wcsr.com

The Protestant Episcopal Church, of the
Parish of Saint Philip, in Charleston South
Carolina

Francis M. Mack, Esquire
Emily R. Gifford, Esquire
Richardson, Plowden & Robinson, P.A.
1900 Barnwell Street
Columbia, South Carolina 29201
(803) 576-3717
Email: fmack@richardsonplowden.com
egifford@richardsonplowden.com

The Vestry and Church Wardens of the
Episcopal Church of the Parish of St.
Matthew

Brandt Shelbourne, Esquire
E. Hope Lumpkin, Esquire
Shelbourne Law Firm
131 E. Richardson Ave.
Summerville, SC 29483
Phone: (843) 871-2210
Email: brandt@shelbournelaw.com
hope@shelbournelaw.com

The Vestry and Wardens of St. Paul's
Church, Summerville

Susan MacDonald, Esquire
Nelson, Mullins, Riley & Scarborough, LLP
BNC Bank Corporate Center, Suite 300
3751 Robert M. Grissom Parkway
Myrtle Beach, South Carolina 29577
(843) 448-3500
Email: susan.macdonald@nelsonmullins.com

Trinity Church of Myrtle Beach

Jim Lehman, Esquire
Nelson, Mullins, Riley & Scarborough, LLP
P. O. Box 11070

Columbia, South Carolina 29211
(803) 255-5564
Email:
Jim.lehman@nelsonmullins.com

Allan P. Sloan, III, Esquire
Joseph C. Wilson IV, Esquire
Pierce, Hems, Sloan & Wilson
321 East Bay Street
P.O. Box 22437
Charleston, South Carolina 29413
(843) 722-7733
Email: chipsloan@phsm.net
joewilson@phsm.net

Edward P. Guerard, Jr., Esquire
1106 Port Harbor Court
Mt. Pleasant, SC 29464
(843) 852-4530
Email: tguerardjr@gmail.com

John B. Williams, Esquire
WILLIAMS & HULST, LLC
209 East Main Street
Moncks Corner, SC 29461
(843) 761-8232
Email: jbw@williamsandhulst.com

George J. Kefalos, Esquire
Oana D. Johnson, Esquire
GEORGE J. KEFALOS, P.A.
46A State Street
Charleston, SC 29401
(843) 722-6612
Email: george@kefaloslaw.com
oana@kefaloslaw.com

Stephen Spitz, Esquire
P. O. Box 535
Charleston, SC 29401

Henry Grimball, Esquire
WOMBLE, CARLYLE, SANDRIDGE & RICE,
LLP.
P.O. Box 999
Charleston, SC 29402

Vestry and Church-Wardens of the
Episcopal Church of the Parish of Christ
Church

Trinity Episcopal Church, Pinopolis

The Vestry and Church Wardens of the
Episcopal Church of the Parish of St.
Andrew's Church, Mount Pleasant

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

(843) 722-3400

Email: hgrimball@wcsr.com


Carole Koerner

August 25, 2014

Amanda A. Bailey

abailey@mcnair.net
T (843) 444-1107
F (843) 444-4729

The Honorable Jenny Abbott Kitchings
Clerk of Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Re: The Protestant Episcopal Church in the Diocese of South Carolina, et al.
v. The Episcopal Church, et al.; Case No.: 2013-CP-18-00013
Appellate Case No.: 2014-001377

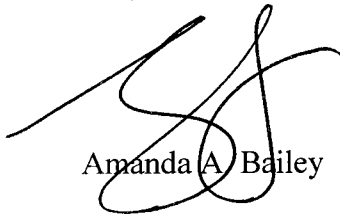
Dear Ms. Kitchings:

Enclosed for filing with the Court, please find original and seven copies of Respondents' Motion to Assess Costs and attached Itemized Statement of Costs, and Proof of Service with regard to the above matter. Please return of filed copy of the Motion to Assess Costs and attached Itemized Statement of Costs, and Proof of Service in the envelope provided herein.

Pursuant to the Proof of Service, a copy of the Motion for Costs has been served on Counsel of Record.

Also enclosed is a check in the amount of \$25.00 as the filing fee.

Very truly yours,



Amanda A. Bailey

AAB/ck
Enclosures

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AUG 26 2014

SC Court of Appeals

cc: Counsel for Respondents (*via email*)
Thomas Tisdale, Esquire
Jason A. Smith, Esquire
David Booth Beers, Esquire
Mary E. Kostel, Esquire
Allan R. Holmes, Esquire
Timothy Lewis, Esquire


McNAIR LAW FIRM, P.A.
Founders Centre
2411 Oak Street, Suite 206
Myrtle Beach, SC 29577

Mailing Address
Post Office Box 336
Myrtle Beach, SC 29578

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ATTORNEYS

The Honorable Jenny Abbott Kitchings
Clerk of Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

McNair Law Firm, P.A.
Post Office Box 336
Myrtle Beach, SC 29578
www.mcnair.net

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