

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

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Case No. 2013-CP-18-00013

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**RECEIVED**  
MAR 24 2015  
**SC Court of Appeals**

The Protestant Episcopal Church  
in the Diocese of South Carolina et. al. . . . . Respondents,

v.

The Episcopal Church (a/k/a The Protestant  
Episcopal Church in the United States of  
America) and The Episcopal Church in South Carolina . . . . . Appellants.

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**MOTION TO CERTIFY**

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This motion is filed pursuant to Rules 204(b) and 240 of the South Carolina Appellate Court Rules. Rule 204(b) governs the permissive transfer of appeals to this Court from the Court of Appeals. Rule 240 governs motions and petitions generally.

This litigation concerns competing claims to ownership over various forms property associated with the episcopal church and with several episcopal parishes in this State. The case was tried to a judge and the judge has issued a final decision. This motion is being filed contemporaneously with the Notice of Appeal.

This Court briefly certified one of the previous appeals in this case. That was an interlocutory appeal of an order limiting discovery, which the Court denied.

With the Court's permission, counsel would like to explore whether the other parties and the Court would be willing to relax certain rules in an effort to avoid unnecessary expense. There are over three dozen plaintiffs, all of whom are now respondents, and there are many lawyers in the case. Rather than serving all parties with bound copies of the briefs and the record, the parties could save significant expense by providing these materials to one another in electronic format. The Court followed a similar procedure in the Abbeville litigation.

This motion also proposes an abbreviated caption for the case's filings.

This motion is filed by The Episcopal Church in South Carolina, which was a defendant below and is an appellant here. The other appellant is The Episcopal Church. It consents to this motion.

March 24, 2015

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Jason S. Smith  
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Charleston, SC 29401

Respectfully submitted,



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*Attorneys for Appellant  
The Episcopal Church in South Carolina*



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

March 24, 2015

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk of Court  
Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211

RECEIVED  
MAR 24 2015  
SC Court of Appeals

RE: The Protestant Episcopal Church in the Diocese of South Carolina, et al.  
v. The Episcopal Church and The Episcopal Church in South Carolina  
Case No. 2013-CP-18-00013

Dear Mr. Shearouse:

This case is currently pending at the South Carolina Court of Appeals. I filed the notice of appeal today.

I have enclosed for filing the original and seven (7) copies of a motion requesting that the Supreme Court certify the case for review. The Court briefly certified a previous appeal in this case and I think it is possible the Court may wish to certify the case again. I have enclosed a proof of service upon counsel of record and the Court of Appeals and a check in the amount of \$25.00 for filing the motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Yours sincerely,

Blake A. Hewitt

Enclosures  
carbon copy listing on following page

cc: The Honorable Jenny Kitchings

Thomas S. Tisdale, Esquire  
Jason S. Smith, Esquire  
Andrew Spencer Platte, Esquire  
C. Alan Runyan, Esquire  
Henrietta U. Golding, Esquire  
Charles H. Williams, Esquire  
C. Pierce Campbell, Esquire  
Ivon Keith McCarty, Esquire  
Harry A. Oxner, Esquire  
Thornwell F. Sowell, Esquire  
Bess J. DuRant, Esquire  
Robert R. Horger  
Lawrence B. Orr, Esquire  
Harry Easterling, Jr., Esquire  
Mark Evans, Esquire  
Saunders M. Bridges, Jr., Esquire  
Stephen S. McKenzie, Esquire  
Robert S. Shelton, Esquire  
John Furman Wall, III  
William A. Bryan, Esquire  
Francis M. Mack, Esquire  
P. Brandt Shelbourne, Esquire  
E. Hope Lumpkin, Esquire

Susan MacDonald, Esquire  
Jim Lehman, Esquire  
Allan P. Sloan, III, Esquire  
Joseph C. Wilson, IV, Esquire  
Edward P. Guerard, Jr., Esquire  
David B. Marvel, Esquire  
David L. DeVane, Esquire  
David Cox, Esquire  
Henry Grimball, Esquire  
Thomas C. Davis, Esquire  
G. Mark Phillips, Esquire  
W. Foster Gaillard, Esquire  
Dane J. Sowinski, Esquire  
William A. Scott, Esquire  
John B. Williams, Esquire  
George D. Kefalos, Esquire  
Stephen Spitz, Esquire  
David Booth Beers, Esquire  
Mary E. Kostel, Esquire  
Allan R. Holmes, Sr., Esquire  
Timothy O. Lewis, Esquire  
Mark E. Feldmann, Esquire  
Paul G. Beers, Esquire