

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

75457
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SC Court of Appeals

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; St. Matthews Church; St. Andrews Church-Mt. Pleasant Land Trust; St. Batholomews Episcopal Church; St. David's 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 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. 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, The Vestries and Churchwardens of The Parish of St. Andrews, Respondents,

v.

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

NOTICE OF APPEAL

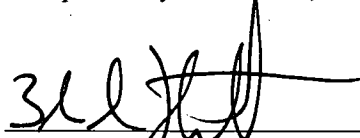
The trial court defendants — The Episcopal Church and The Episcopal Church in South Carolina — appeal from the judgment of the Honorable Diane S. Goodstein. They also appeal the order denying their motion for reconsideration of that judgment as well as any intermediate rulings and orders affecting the judgment.

Judge Goodstein's judgment was dated and filed February 3, 2015.

On February 13th, the defendants filed a motion for reconsideration which Judge Goodstein denied in a written order dated and filed February 23rd.

The defendants received written notice of this order's entry that same day.

Respectfully submitted,



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March 24, 2015

Allan R. Holmes Sr. by BAHW

Allan R. Holmes, Sr. # 2576 *EXPRESS*

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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 Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Notice of Appeal and Motion to Certify* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

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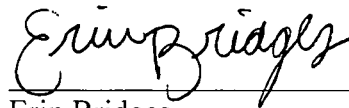
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March 24, 2015
Columbia, South Carolina



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March 24, 2015

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
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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 Ms. Kitchings:

I am enclosing the original and one (1) copy of a Notice of Appeal in this case. I have also enclosed proof that my office has served the notice of appeal, a copy of the orders which are to be challenged, a filing fee of \$100, and my Notice of Appearance.

I represent The Episcopal Church in South Carolina, which was one of the two (2) defendants at trial. I have been authorized, however, to initiate an appeal on behalf of both of the defendants.

The other defendant/appellant is The Episcopal Church. Two of its trial lawyers – David Beers and Mary Kostel – were admitted pro hac vice. Their orders of admission are attached.

I have also enclosed a Motion asking the Supreme Court to certify this appeal pursuant to Rule 204. The \$25 filing fee is enclosed with the carbon copy for the Supreme Court.

This is a rather large case. There are lots of parties, there are lots of lawyers, this was a long trial, and there were lots of exhibits. My motion proposes an abbreviated caption and that the Court consider granting the parties permission to discuss relaxing the usual rules regarding copying and service. We will, of course, abide by whatever directions the Court issues.

Please return the additional filed copies of these documents to me via our courier. Thank you for your attention to this matter, and please do not hesitate to contact me if I can be of any service to you.

Yours sincerely,

Blake A. Hewitt

Enclosures
carbon copy listing on following page

cc: The Honorable Daniel E. Shearouse
The Honorable Cheryl L. Graham

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March 24, 2015

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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

Dear Ms. Graham:

Please find enclosed for filing a Notice of Appeal and proof of service in reference to the above matter.

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

Sincerely,

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