

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

JUN 11 2015

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

S.C. Supreme Court

The Honorable Diane S. Goodstein
Circuit Court Judge

Case No. 2013-CP-18-00013

The Protestant Episcopal Church In The Diocese Of South Carolina, et al.,
..... Respondents,

v.

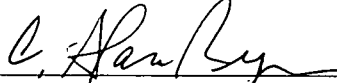
The Episcopal Church (a/k/a The Protestant Episcopal Church in the United States of
America); and The Episcopal Church in South Carolina, Appellants.

MOTION TO EXCEED PAGE LIMITATIONS

Pursuant to Rule 240, SCACR, the Respondents request permission to exceed the fifty (50) page limitation set forth in Rule 208(b)(5) for their initial brief. The Respondents, comprised of The Protestant Episcopal Church in the Diocese of South Carolina, the Trustees of the Protestant Episcopal Church in South Carolina, and thirty-six (36) individual parishes, will be responding to the Initial Brief of the Appellants collectively in one brief. As a result of the multitude of parties, the Respondents request to exceed the page limitation by no more than ten (10) pages, which if granted, would limit Respondents' Initial Brief to sixty (60) pages.

Respondents' Initial Brief is due on or before June 15, 2015. In the event a ruling on this motion is not made prior to this due date, Respondents move that this court provisionally accept a timely filing of Respondents' Initial Brief in excess of the page limitations until such ruling can be made by this Court.

SPEIGHTS & RUNYAN



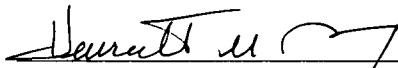
C. Alan Runyan, Esquire
Andrew S. Platte, Esquire
Speights & Runyan
2015 Boundary Street, Suite 239
Beaufort, South Carolina 29902
(803) 943-4444
Email: arunyan@speightsrunyan.com
aplatte@speightsrunyan.com

NELSON MULLINS
RILEY & SCARBOROUGH, LLP



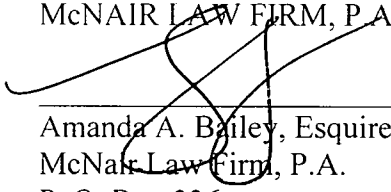
C. Mitchell Brown, Esquire
Nelson Mullins Riley & Scarborough
1320 Main Street
Columbia, SC 29201
(803) 255-9595
Email: mitch.brown@nelsonmullins.com

McNAIR LAW FIRM, P.A.



Henrietta U. Golding, Esquire
McNair Law Firm, P.A.
P. O. Box 336
Myrtle Beach, South Carolina 29578
(843) 444-1107
Email: hgolding@mcnair.net

McNAIR LAW FIRM, P.A.



Amanda A. Bailey, Esquire
McNair Law Firm, P.A.

P. O. Box 336

Myrtle Beach, South Carolina 29578

(843) 444-1107

Email: abailey@mcnair.net

Dated: June 10, 2015

ATTORNEYS FOR RESPONDENTS

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Diane S. Goodstein
Circuit Court Judge

Case No. 2013-CP-18-00013

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); The Episcopal Church in South Carolina, Appellants.

PROOF OF SERVICE

I, Carole Koerner, an employee of McNair Law Firm, P.A., attorneys for the Respondents,
do hereby certify that I have served a copy of the Motion to Exceed Page Limitations and Proof of
Service, on this the 10th day of June, 2015, by electronically mailing copies of the same to the
attorneys identified below:

ATTORNEYS FOR APPELLANTS:

Blake A. Hewitt #73674
John S. Nichols #4210
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO
bhewitt@bntdlaw.com
jsnichols@bntdlaw.com

Thomas S. Tisdale, Jr., Esquire
Jason S. Smith, Esquire
Hellman Yates & Tisdale
tst@hellmanyates.com
js@hellmanyates.com
andrea.st.amand@hotmail.com

R. Walker Humphrey, II, Esquire
WATERS & KRAUS
whumphrey@waterskraus.com

Attorneys for The Episcopal Church in South Carolina

David Booth Beers, Esquire
Mary E. Kostel, Esquire
dbeers@goodwinprocter.com
mkostel@goodwinprocter.com

Allan R. Holmes, Esquire
Timothy Lewis, Esquire
aholmes@gibbs-holmes.com
timolewis@gibbs-holmes.com

Attorneys for The Episcopal Church

COUNSEL FOR RESPONDENTS:

C. Alan Runyan, Esquire
Andrew S. Platte, Esquire
Speights & Runyan
arunyan@speightsrunyan.com
aplatte@speightsrunyan.com

Attorneys Church of The Cross, Inc. and Church of the Cross Declaration of Trust, The Church of Our Saviour, of the Diocese of South Carolina, 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, and Old Saint Andrews Parish Church

Henrietta U. Golding, Esquire
McNair Law Firm, P.A.
Email: hgolding@mcnair.net

Attorney for St. Luke's Church Hilton Head

Charles H. Williams, Esquire
Williams & Williams
chwilliams@williamsattys.com

*Attorneys for 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*

David Cox, Esquire
Womble, Carlyle, Sandridge & Rice, LLP
dcox@wcsr.com

*Attorneys for 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*

Thomas Davis, Esquire
Harvey & Battey, PA
tadavis@harveyandbattey.com

*Attorneys for 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, Padget, Graham & Laney
pcampbell@turnerpadget.com

*Attorneys for All Saints Protestant Episcopal Church, Inc.,
St. Bartholomews Episcopal Church and The Church of the Holy Cross*

I. Keith McCarty, Esquire
McCarty Law Firm, LLC
ikeithmccarty@gmail.com

Attorneys for Christ St. Paul's Episcopal Church

Harry A. Oxner, Esquire
Oxner & Stacy
oxhat@aol.com

*Attorneys for Christ the King Waccamaw and 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

bsowell@sowellgray.com
bdurant@sowellgray.com

Attorneys for the Church of the Holy Comforter

Robert R. Horger, Esquire
Horger, Barnwell & Reid, LLP
rhorger@hbrllp.com

Attorneys for the Church of The Redeemer

William A. Scott, Esquire
Pedersen & Scott, PC
bscott@pslawpc.com

Dane Sowinski, Esquire
Rogers Townsend & Thomas PC
dane.sowinski@rtt-law.com

Attorneys for the Holy Trinity Episcopal Church

Lawrence B. Orr, Esquire
Orr Elmore & Ervin, LLC
lbo@orrfirm.com

*Attorneys for Saint Matthews Church, and
St. John's Episcopal Church of Florence, South Carolina*

Saunders M. Bridges, Jr., Esquire
Aiken Bridges Elliott Tyler & Saleeby
smb@aikenbridges.com

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

Harry Easterling Jr., Esquire
Goldberg & Easterling, P.A.
gandelaw@bellsouth.net

*Attorneys for St. David's Church
and St. Paul's Episcopal Church of Bennettsville, Inc.*

Mark Evans, Esquire
mevans14@bellsouth.net

Attorneys for St. James Church James Island, South Carolina

Stephen S. McKenzie, Esquire
Coffey, Chandler & Kent, P.A.
steve@cckmlaw.com

*Attorneys for St. Matthias Episcopal Church, Inc.
and The Church of the Epiphany (Episcopal)*

Robert S. Shelton, Esquire
Bellamy Law Firm
rshelton@bellamylaw.com

Attorneys for St. Paul's Episcopal Church of Conway

David B. Marvel, Esquire
Prenner Marvel, P.A.
dave@prennermarvel.com

David L. DeVane, Esquire
david@attorneyscharleston.com

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

John Furman Wall, III, Esquire
walljohn@bellsouth.net

Attorneys for The Church of the Good Shepherd, Charleston, South Carolina

William A. Bryan, Esquire
Bryan & Haar
billbryan@bryanandhaar.net

Attorneys for The Church of the Resurrection, Surfside

G. Mark Phillips, Esquire
Nelson Mullins Riley & Scarborough, LLP
mark.phillips@nelsonmullins.com

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

W. Foster Gaillard, Esquire
Womble, Carlyle, Sandridge & Rice, LLP
fgaillard@wcsr.com

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

Francis M. Mack, Esquire
fmmack@windstream.net

*Attorneys for 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
brandt@shelbournelaw.com
hope@shelbournelaw.com

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

Susan MacDonald, Esquire
Nelson, Mullins, Riley & Scarborough, LLP
susan.macdonald@nelsonmullins.com

Jim Lehman, Esquire
Nelson, Mullins, Riley & Scarborough, LLP
Jim.lehman@nelsonmullins.com

Attorneys for Trinity Church of Myrtle Beach

Allan P. Sloan, III, Esquire
Joseph C. Wilson IV, Esquire
Pierce, Hems, Sloan & Wilson

chipsloan@phsm.net
joewilson@phsm.net

Edward P. Guerard, Jr., Esquire
tguerardjr@gmail.com

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

John B. Williams, Esquire
WILLIAMS & HULST, LLC
jbw@williamsandhulst.com

Attorneys for Trinity Episcopal Church, Pinopolis


George J. Kefalos, Esquire
Oana D. Johnson, Esquire
GEORGE J. KEFALOS, P.A.
george@kefaloslaw.com
oana@kefaloslaw.com

Stephen Spitz, Esquire
sc.spitz@prodigy.net

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

Henry Grimball, Esquire
WOMBLE, CARLYLE, SANDRIDGE & RICE, LLP.
hgrimball@wcsr.com

*Attorneys for 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*


Carole Koerner