

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

**RECEIVED**

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

JUN 26 2015

The Honorable Diane S. Goodstein  
Circuit Court Judge

**S.C. SUPREME COURT**

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 AMEND DESIGNATION OF MATTERS  
TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rules 209 and 240 of the South Carolina Appellate Court Rules, the Respondents move for permission to Amend their Designation of Matters to be Included in the Record on Appeal, timely filed together with Respondents' Initial Brief on June 15, 2015. In the alternative, the Respondents move for permission to supplement the record on appeal pursuant to Rule 212, SCACR.

The grounds for this motion are that Respondents inadvertently failed to designate the following trial testimony and exhibits relevant to the appeal as set

forth in the attached Amended Designation of Matters to be Included in the Record on Appeal, attached hereto as "Exhibit A".

Pursuant to the Order of this Court issued on April 15, 2015, Respondents collectively have taken careful measures to present the Court with only materials critical to a decision. However, in doing so, Respondents have inadvertently left off portions of the trial transcript and exhibits containing testimony which is otherwise relevant to the appeal. Additionally, certain issues which appeared not to be in dispute, may in fact be disputed based upon Appellants' failure to respond to correspondence asking if certain issues were undisputed.

Pursuant to the April 15, 2015 Order of this Court, counsel for the Respondents hereby certify that they have attempted in good faith to resolve this motion by consent, and that such consent has been granted by Appellants. The Appellants will not be prejudiced if this motion is granted as these proposed amendments to the Respondents' Designation of Matters are matters not in dispute and are not directly referenced in Respondents' Brief.

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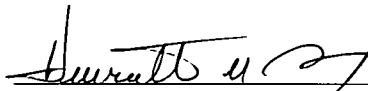
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Dated: June 25, 2015

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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 Amend Designation of Matters to be  
Included in the Record on Appeal, Exhibit A (Respondent’s Amended Designation of Matter to be  
Included in the Record on Appeal) and Proof of Service, on this the 25<sup>th</sup> day of June, 2015, by  
electronically mailing copies of the same to the attorneys identified below:

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