

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

S.C. Supreme Court

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.

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**MOTION TO ARGUE AGAINST PRECEDENT**

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This motion is filed pursuant to Rule 217 of the South Carolina Appellate Court Rules.

Oral argument is scheduled for September 23, 2015, which is 15 days from the date of this motion. See Rule 217 (deadline is 15 days prior to argument).

The precedent in question is this Court's decision in *All Saints Parish Waccamaw v. Protestant Episcopal Church in the Diocese of South Carolina*, 385 S.C. 428, 685 S.E.2d 163 (2009).

This motion is filed out of an abundance of caution. Appellants believe that the underlying facts in *All Saints* are materially distinguishable from this controversy and

that the rule the Court articulated in *All Saints* supports the Appellants' argument for reversal. If, however, the Court disagrees and is of the view that *All Saints* would require affirmance, the Appellants would advocate its overruling.

Respectfully submitted,


September 8, 2015

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**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served  
counsel for the Respondents with a copy of the *Motion to Argue Against Precedent* by  
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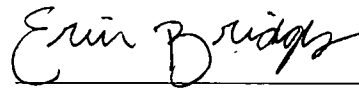
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September 8, 2015  
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A handwritten signature in cursive script that reads "Erin Bridges". The signature is written in black ink and is positioned above a horizontal line.

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