

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

Oct 07 2020

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
Edgar W. Dickson, Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2020-000993

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; 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. Bartholomew's Episcopal Church; St. David's Church; St. James; Church, James Island, S.C.; St. Paul's Episcopal Church of Bennettsville, Inc.; 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 The Episcopal 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. Andrew,

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.

MOTION FOR THIRD EXTENSION OF TIME TO FILE
INITIAL BRIEF OF APPELLANT AND DESIGNATION OF MATTER

Appellants respectfully request a thirty (30) day extension of time within which to file their initial brief and designation of matter, currently due by October 12, 2020.

The undersigned is requesting the additional time because of counsel's workload, other deadlines, and professional obligations; the complex procedural history of this matter; the volume of previous filings and proceedings relevant to this appeal; the relatively recent certification of this appeal to the Supreme Court; the recent addition of additional appellate counsel for Appellant The Episcopal Church in South Carolina (Kathleen C. Barnes, Esquire will be filing a Notice of Appearance in the immediate future); and scheduling issues caused by the ongoing coronavirus pandemic.

This is Appellants' third request for an extension of these deadlines. If the Court grants the extension, the new deadline will be November 11, 2020. The undersigned has attempted to consult with Respondents' counsel regarding their position on the requested extension but has not been successful in communicating with them on this topic.

Respectfully submitted,

Dated: October 7, 2020

/s/ Bert G. Utsey, III
Bert G. Utsey, III
PETERS, MURDAUGH, PARKER,
ELTZROTH & DETRICK, P.A.
P.O. Box 30968
Charleston, SC 29417
(843) 818-4399
butsey@pmped.com

Thomas S. Tisdale, Jr.
Jason S. Smith
HELLMAN YATES & TISDALE
105 Broad Street, Third Floor
Charleston, South Carolina 29401
(843) 266-9099
tst@hellmanyates.com
js@hellmanyates.com

Kathleen F. Monoc
MONOC LAW, LLC
77 Grove Street
Charleston, South Carolina 29403
(843) 790-8910
katie@monoclaw.com

*Counsel for The Episcopal Church in South
Carolina*

/s/ Allan R. Holmes
Allan R. Holmes
GIBBS & HOLMES
171 Church Street, Suite 110
Charleston, South Carolina 29401
Telephone: (843)722-0033
aholmes@gibbs-holmes.com

David Booth Beers
GOODWIN PROCTER, LLP
901 New York Avenue, NW
Washington, DC 20001
Telephone: (202) 346-4000
dbeers@goodwinlaw.com

Mary E. Kostel
Chancellor to the Presiding Bishop
The Episcopal Church
3737 Seminary Road
PMB 200
Alexandria, VA 22304
Telephone: (703) 898-8413
mkostel@episcopalchurch.org

Counsel for The Episcopal Church