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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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.

Appellate Case No. 2020-00986

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CONSENT MOTION FOR SECOND EXTENSION TO FILE  
RESPONDENTS' INITIAL BRIEF

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Respondents move to extend the deadline for filing their Initial Brief in this matter. Respondents' brief is currently due January 13, 2021. Due to the holidays and other work obligation, the Respondents respectfully request an additional thirty day extension for the brief. Respondents do not anticipate needing to request further extensions. Opposing counsel consents to this request. (see attached email).

*Signature Page Attached*

December 31, 2020

Respectfully submitted,

By: s/ C. Mitchell Brown

C. Mitchell Brown, Esq.

NELSON, MULLINS, RILEY & SCARBOROUGH

1320 Main Street, 17<sup>th</sup> Floor

Post Office Box 11070

Columbia, SC 29211-1070

[mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com)

*Attorneys for The Protestant Episcopal Church In The  
Diocese of South Carolina; and The  
Trustees of the Protestant Episcopal Church of South  
Carolina, a South Carolina Corporate  
Body*

Francis M. Mack, Esq.

656 Fort Motte Road

Saint Matthews, SC 29135

[fmack@windstream.net](mailto:fmack@windstream.net)

*Attorney for Vestry/Wardens – Episcopal Church/St.  
Matthews Parish*

C. Pierce Campbell, Esq.

TURNER, PADGET, GRAHAM & LANEY

319 South Irby Street, P.O. Box 5478

Florence, SC 29501

[pcampbell@turnerpadget.com](mailto:pcampbell@turnerpadget.com)

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

Allan P. Sloan, III, Esq.

PIERCE, SLOAN, WILSON, KENNEDY & EARLY, LLC

321 East Bay Street; P.O. Box 22437

Charleston, SC 29413

[chipsloan@piercesloan.com](mailto:chipsloan@piercesloan.com)

*Attorneys for Vestry/Wardens/Epis. Church/Parish of  
Christ*

Thomas C. Davis, Esq.

HARVEY & BATTEY, PA

1001 Craven Street

Beaufort, SC 29901

[tdavis@harveyandbattey.com](mailto:tdavis@harveyandbattey.com)

*Attorneys for Christ St. Paul's Episcopal Church*

C. Alan Runyan, Esq.

Andrew S. Platte, Esq.  
RUNYAN & PLATTE, LLC  
2015 Boundary Street, Suite 239  
Beaufort, SC 29902  
[arunyan@runyanplatte.com](mailto:arunyan@runyanplatte.com); [aplatte@runyanplatte.com](mailto:aplatte@runyanplatte.com)  
*Attorneys for Protestant Episcopal Church In The Diocese  
Of South Carolina, Church Of The  
Cross, Inc. and Church Of The Cross Declaration of Trust,  
Church Of Our Savior, Of The  
Diocese of South Carolina, Protestant Episcopal Church,  
Parish Of Saint Phillip, Protestant  
Episcopal Church, Parish Of Saint Michael, In,  
Vestry/Wardens-Episcopal/St Helena/St. Helena  
Trust, St. David's Church, Vestry/ Wardens-  
Episcopal/Parish of St. John's Chas Cty, Church of  
the Epiphany (Episcopal), Trinity Episcopal Church, Edisto  
Island, Vestry/Wardens – Episcopal  
Church/St. Jude's of Walterboro*

Susan MacDonald, Esq.  
NELSON, MULLINS, RILEY & SCARBOROUGH, LLP  
BNC Bank Corporate Center, Suite 300  
3751 Robert M. Grissom Parkway  
Myrtle Beach, SC 29577  
[susan.macdonald@nelsonmullins.com](mailto:susan.macdonald@nelsonmullins.com)  
*Attorneys for Trinity Church of Myrtle Beach*

John Furman Wall, Esq.  
140 Wando Reach Court  
Mt. Pleasant, SC 29464  
[walljohn@bellsouth.net](mailto:walljohn@bellsouth.net)  
*Attorney for Church Of The Good Shepherd, Charleston, SC*

G. Mark Phillips, Esq.  
NELSON, MULLINS, RILEY & SCARBOROUGH, LLP  
Liberty Center, Suite 600  
151 Meeting Street  
Charleston, SC 29401-2239  
[mark.phillips@nelsonmullins.com](mailto:mark.phillips@nelsonmullins.com)  
*Attorneys for Protestant Epis.Ch, Parish Of Saint Phillip*

Mark V. Evans, Esq.  
147 Wappoo Creek Drive, Ste. 202  
Charleston, SC 29412  
[mevans14@bellsouth.net](mailto:mevans14@bellsouth.net)  
*Attorneys for St James' Church, James Island, S. C.*

James Kent Lehman, Esquire  
PO Box 11070  
Columbia, SC 29211  
[jim.lehman@nelsonmullins.com](mailto:jim.lehman@nelsonmullins.com)  
*Attorney for Trinity Church of Myrtle Beach*

William A. Scott, Esq.  
PEDERSEN & SCOTT, PC  
775 St. Andrews Blvd.  
Charleston, SC 29407  
[bscott@pslawpc.com](mailto:bscott@pslawpc.com)  
*Attorney for Holy Trinity Episcopal Church*

David L. DeVane, Esq.  
110 N. Main Street  
Summerville, SC 29483  
[david@devanemacklaw.com](mailto:david@devanemacklaw.com)  
*Attorney for Church Of St. Luke and St. Paul, Radcliffeboro*

David B. Marvel, Esq.  
DAVID B. MARVEL, LLC  
P.O. Box 22734  
Charleston, SC 29413  
[dave@marvel.lawyer](mailto:dave@marvel.lawyer)  
*Attorney for Church Of St. Luke and St. Paul, Radcliffeboro*

Henry E. Grimball, Esquire  
WOMBLE Bond Dickison (US) LLP  
P.O. Box 999  
Charleston, SC 29402  
[henry.grimball@wbd-us.com](mailto:henry.grimball@wbd-us.com)  
*Attorneys The Protestant Episcopal Church, The Parish Of  
St. Michael, In Charleston, In The  
State of South Carolina and St. Michael's Church  
Declaration Of Trust*

Peter Brandt Shelbourne, Esq.  
SHELBOURNE LAW FIRM  
131 E. Richardson Avenue  
Summerville, SC 29483  
[brandt@shelbournelaw.com](mailto:brandt@shelbournelaw.com)  
*Attorneys for Vestry/Wardens - St. Paul's Church,  
Summerville, Trinity Episcopal Church,  
Pinopolis*

David S. Cox, Esq.

BARNWELL WHALEY PATTERSON & HELMS, LLC  
288 Meeting Street, Suite 200  
Charleston, SC 29401  
[dcox@barnwell-whaley.com](mailto:dcox@barnwell-whaley.com)  
*Attorneys for Protestant Episcopal Church In The Diocese  
Of South Carolina, Trustees of  
Protestant Episcopal Church in the Diocese of SC*

Charles H. Williams, Esq.  
WILLIAMS & WILLIAMS  
P.O. Box 1084  
Orangeburg, SC 29116-1084  
[chwilliams@williamsattys.com](mailto:chwilliams@williamsattys.com)  
*Attorneys for Protestant Episcopal Church In The Diocese  
Of South Carolina, Trustees of  
Protestant Episcopal Church in the Diocese of SC*

Henrietta U. Golding, Esq.  
BURR FORMAN & McNAIR  
P.O. Box 336  
Myrtle Beach, SC 29578  
[hgolding@burr.com](mailto:hgolding@burr.com)  
*Attorneys for Protestant Episcopal Church In The Diocese  
Of South Carolina, Saint Luke's  
Church, Hilton Head, Trustees of Protestant Episcopal  
Church in the Diocese of SC*

Robert R. Horger, Esq,  
HORGER, BARNWELL & REID, LLP  
P.O. Drawer 329  
1459 Amelia Street  
Orangeburg, SC 29115  
[rhorger@hbrllp.com](mailto:rhorger@hbrllp.com)  
*Attorneys for Church Of The Redeemer*

Thornwell F. Sowell, Esq,  
Bess J. DuRant, Esq.  
SOWELL & DuRANT, LLC  
1325 Park Street, Suite 100  
Columbia, SC 29201  
[bsowell@sowelldurant.com](mailto:bsowell@sowelldurant.com)  
[bdurant@sowelldurant.com](mailto:bdurant@sowelldurant.com)  
*Attorneys for Church Of The Holy Comforter*

Joseph C. Wilson, IV, Esq.  
JOSEPH C., WILSON LAW FIRM, LLC  
PO Box 178

Folly Beach, SC 29439  
[jcamwilsoniv@gmail.com](mailto:jcamwilsoniv@gmail.com)  
*Attorneys for Vestry/Wardens/Epis.Church/Parish of Christ*

William A. Bryan, Esq.  
BRYAN & HAAR  
P.O. Box 14860  
Surfside Beach, SC 29587  
[billbryan@bryanandhaar.net](mailto:billbryan@bryanandhaar.net)  
*Attorneys for Church of the Resurrection, Surfside*

I. Keith McCarty, Esq.  
McCARTY LAW FIRM, LLC  
P.O. Box 30055  
Charleston, SC 29417  
[ikeithmccarty@gmail.com](mailto:ikeithmccarty@gmail.com)  
*Attorneys for Christ St. Paul's Episcopal Church*

Harry Easterling, Jr., Esq.  
120 North Liberty Street  
Post Office Box 611  
Bennettsville, SC 29512  
[hreasterling@gmail.com](mailto:hreasterling@gmail.com)  
*Attorneys for St. Davids Church, St. Paul's Episcopal Church/Bennettsville, Inc*

W. Foster Gaillard, Esq.  
WOMBLE BOND DICKINSON (US) LLP  
P.O. Box 999  
Charleston, SC 29402  
[foster.gaillard@wbd-us.com](mailto:foster.gaillard@wbd-us.com)  
*Attorneys for Protestant Epis.Ch, Parish Of Saint Phillip*

Edward P. Guerard, Jr.  
1106 Port Harbor Court  
Mt. Pleasant, SC 29464  
[tguerardjr@gmail.com](mailto:tguerardjr@gmail.com)  
*Attorneys for Vestry/Wardens/Epis.Church/Parish of Christ*

John B. Williams, Esquire  
WILLIAMS & HULST, LLC  
209 East Main Street  
Moncks Comer, SC 29461  
[jbw@williamsandhulst.com](mailto:jbw@williamsandhulst.com)  
*Trinity Episcopal Church, Pinopolis*

ATTACHMENT  
TO CONSENT MOTION FOR SECOND EXTENSION TO FILE  
RESPONDENTS' INITIAL BRIEF

*(Consent of Opposing Counsel to this Motion)*

## Eileen Hindman

---

**From:** Mitch Brown  
**Sent:** Wednesday, December 30, 2020 9:58 PM  
**To:** Eileen Hindman  
**Subject:** FW: Episcopal Church appeal

We have consent for the motion.

**From:** Bert Utsey <bert@cfulaw.com>  
**Sent:** Wednesday, December 30, 2020 9:56 PM  
**To:** Mitch Brown <mitch.brown@nelsonmullins.com>  
**Subject:** Re: Episcopal Church appeal

No objection. Happy new year!

Bert G. Utsey, III  
Sent from my iPhone

On Dec 30, 2020, at 9:37 PM, Mitch Brown <[mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com)> wrote:

Hi Skip:

Got your auto-reply message so I am forwarding the below request to your new email address.

Mitch

**From:** Mitch Brown  
**Sent:** Wednesday, December 30, 2020 9:35 PM  
**To:** Bert Utsey <[BUtsey@pmped.com](mailto:BUtsey@pmped.com)>  
**Subject:** Episcopal Church appeal

Hello Skip:

Hope you had an enjoyable Christmas holiday.

Due to the holidays and other work obligations, we intend to move for one more extension for our South Carolina Supreme Court brief. We do not anticipate the need for any further extensions after this second one. May I indicate in the motion that TEC consents? Thank you,

Mitch

Nelson Mullins is continuing to monitor developments related to COVID-19, including guidance from the Centers for Disease Control and various health officials; and federal, state, and local government authorities. The firm has implemented precautionary measures and plans to ensure the continuation of all firm services to clients from both in office and remote work arrangements across our 25

geographically disperse offices. [Click here to visit the Nelson Mullins Coronavirus Resources page.](#) Information described therein is subject to change.

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THE STATE OF SOUTH CAROLINA  
In The Supreme Court

Appellate Case No. 2020-000986

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. 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.

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**PROOF OF SERVICE**  
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I, the undersigned, of the law offices of Nelson Mullins Riley & Scarborough LLP, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow in accordance with the Supreme Court's May 29, 2020 Administrative Order by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System:

Pleading Served:        Consent Motion for Second Extension to File Respondents' Initial Brief

Counsel Served:                                *VIA EMAIL*

***APPELLANTS' COUNSEL:***

<b><i>The Episcopal Church</i></b>	Allan R. Holmes GIBBS & HOLMES 171 Church Street, Suite 110 Charleston, SC 29401 <a href="mailto:aholmes@gibbs-holmes.com">aholmes@gibbs-holmes.com</a>  David Booth Beers, Esquire Mary E. Kostel GOODWIN PROCTER LLP 1900 N St NW Washington, DC 20036 <a href="mailto:mkostel@goodwinlaw.com">mkostel@goodwinlaw.com</a> <a href="mailto:dbeers@goodwinlaw.com">dbeers@goodwinlaw.com</a>
<b><i>The Episcopal Church in South Carolina:</i></b>	Bert G. Utsey, III PETERS MURDAUGH PARKER ELTZROTH & DETRICK, PA PO Box 30968 Charleston, SC 29417 <a href="mailto:butsey@pmped.com">butsey@pmped.com</a>

	<p>Thomas S. Tisdale  Jason S. Smith  HELLMAN, YATES &amp; TISDALE  105 Broad Street, 3<sup>rd</sup> Floor  Charleston, South Carolina 29401  <a href="mailto:tst@hellmanyates.com">tst@hellmanyates.com</a>  <a href="mailto:js@hellmanyates.com">js@hellmanyates.com</a></p> <p>Kathleen F. Monoc  MONOC LAW LLC  77 Grove Street  Charleston, SC 29403  <a href="mailto:katie@monoclaw.com">katie@monoclaw.com</a></p> <p>Kathleen C. Barnes  Barnes Law Firm, LLC  PO Box 897  Hampton, SC 29924  <a href="mailto:kbarnes@barneslawfirm.com">kbarnes@barneslawfirm.com</a></p>
--	--

***RESPONDENTS' COUNSEL:***

<p><b><i>All Saints Protestant Episcopal Church, Inc.</i></b></p>	<p>C. Pierce Campbell  TURNER, PADGET, GRAHAM &amp; LANEY  319 South Irby Street,  P.O. Box 5478  Florence, SC 29501  <a href="mailto:pcampbell@turnerpadget.com">pcampbell@turnerpadget.com</a></p>
<p><b><i>Christ St. Paul's Episcopal Church</i></b></p>	<p>Thomas C. Davis  HARVEY &amp; BATTERY, PA  PO Box 1107  1001 Craven Street (29902)  Beaufort, SC 29901-1107  <a href="mailto:tdavis@harveyandbattey.com">tdavis@harveyandbattey.com</a></p> <p>I. Keith McCarty  McCARTY LAW FIRM, LLC  P.O. Box 30055  Charleston, SC 29417  <a href="mailto:ikeithmccarty@gmail.com">ikeithmccarty@gmail.com</a></p>

<p><b><i>Church of The Cross Declaration of Trust</i></b></p>	<p>C. Alan Runyan          Andrew S. Platte          RUNYAN &amp; PLATTE, LLC          2015 Boundary Street, Suite 239          Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<p><b><i>Church of The Cross, Inc.</i></b></p>	<p>C. Alan Runyan          Andrew S. Platte          RUNYAN &amp; PLATTE, LLC          2015 Boundary Street, Suite 239          Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<p><b><i>Church of the Holy Comforter</i></b></p>	<p>Bess Jones DuRant          Thornwell F. Sowell, III          SOWELL &amp; DURANT, LLC          1325 Park Street, Suite 100          Columbia, SC 29201  <a href="mailto:bdurant@sowelldurant.com">bdurant@sowelldurant.com</a>  <a href="mailto:bsowell@sowelldurant.com">bsowell@sowelldurant.com</a></p>
<p><b><i>Church of the Redeemer</i></b></p>	<p>Robert R. Horger          HORGER, BARNWELL &amp; REID, LLP          P.O. Drawer 329          1459 Amelia Street          Orangeburg, SC 29115  <a href="mailto:rhorger@hbrllp.com">rhorger@hbrllp.com</a></p>
<p><b><i>Holy Trinity Episcopal Church</i></b></p>	<p>William A. Scott          PEDERSEN &amp; SCOTT, PC          775 St. Andrews Blvd.          Charleston, SC 29407  <a href="mailto:bscott@pslawpc.com">bscott@pslawpc.com</a></p>
<p><b><i>Saint Luke's Church, Hilton Head</i></b></p>	<p>Henrietta U. Golding          BURR FORMAN MCNAIR          P. O. Box 336          Myrtle Beach, SC 29578  <a href="mailto:hgolding@burr.com">hgolding@burr.com</a></p>

<b><i>St. Bartholomew's Episcopal Church</i></b>	C. Pierce Campbell TURNER, PADGET, GRAHAM & LANEY 319 South Irby Street, P.O. Box 5478 Florence, SC 29501 <a href="mailto:pcampbell@turnerpadget.com">pcampbell@turnerpadget.com</a>
<b><i>St. David's Church</i></b>	<p>Harry Roberson Easterling, Jr. EASTERLING LAW FIRM, PC 120 North Liberty Street Post Office Box 611 Bennettsville, South Carolina 29512 <a href="mailto:hreasterling@gmail.com">hreasterling@gmail.com</a></p> <p>Andrew Spencer Platte C. Alan Runyan RUNYAN &amp; PLATTE, LLC 2015 Boundary Street, Suite 239 Beaufort, SC 29902 <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a> <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<b><i>St. James' Church, James Island, S.C.</i></b>	Mark V. Evans 147 Wappoo Creek Drive, Suite 202 Charleston, SC 29412 <a href="mailto:mevans14@bellsouth.net">mevans14@bellsouth.net</a>
<b><i>St. Michael's Church Declaration of Trust</i></b>	Henry Grimball, Esquire WOMBLE, CARLYLE, SANDRIDGE & RICE, LLP. P.O. Box 999 Charleston, SC 29402 <a href="mailto:henry.grimball@wbd-us.com">henry.grimball@wbd-us.com</a>
<b><i>St. Paul's Episcopal Church of Bennettsville, Inc.</i></b>	Harry R. Easterling, Jr., Esquire EASTERLING LAW FIRM, PC 120 North Liberty Street Post Office Box 611 Bennettsville, South Carolina 29512 <a href="mailto:hreasterling@gmail.com">hreasterling@gmail.com</a>
<b><i>The Church of Our Saviour of the Diocese of South Carolina</i></b>	Andrew Spencer Platte C. Alan Runyan RUNYAN & PLATTE, LLC

	<p>2015 Boundary Street, Suite 239          Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<p><b><i>The Church of St. Luke and St. Paul,          Radcliffeboro</i></b></p>	<p>David L. DeVane          110 N. Main Street          Summerville, SC 29483  <a href="mailto:david@devanemacklaw.com">david@devanemacklaw.com</a></p> <p>David B. Marvel          DAVID B. MARVEL, LLC          P.O. Box 22734          Charleston, SC 29413  <a href="mailto:dave@marvel.lawyer">dave@marvel.lawyer</a></p>
<p><b><i>The Church of The Epiphany          (Episcopal)</i></b></p>	<p>Andrew Spencer Platte          C. Alan Runyan          RUNYAN &amp; PLATTE, LLC          2015 Boundary Street, Suite 239          Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<p><b><i>The Church of the Good Shepherd,          Charleston, S.C.</i></b></p>	<p>John Furman Wall, III          140 Wando Reach Court          Mt. Pleasant, SC 29464  <a href="mailto:walljohn@bellsouth.net">walljohn@bellsouth.net</a></p>
<p><b><i>The Church of The Holy Cross</i></b></p>	<p>C. Pierce Campbell          TURNER, PADGET, GRAHAM &amp; LANEY          319 South Irby Street,          P.O. Box 5478          Florence, SC 29501  <a href="mailto:pcampbell@turnerpadget.com">pcampbell@turnerpadget.com</a></p>
<p><b><i>The Church of The Resurrection,          Surfside</i></b></p>	<p>William A. Bryan          BRYAN &amp; HAAR          P.O. Box 14860          Surfside Beach, SC 29587  <a href="mailto:billbryan@bryanandhaar.net">billbryan@bryanandhaar.net</a></p>
<p><b><i>The Protestant Episcopal Church in          the Diocese of South Carolina</i></b></p>	<p>David Spence Cox</p>

	<p>BARNWELL WHALEY PATTERSON &amp; HELMS, LLC  288 Meeting Street  Charleston, SC 29401  <a href="mailto:dcox@barnwell-whaley.com">dcox@barnwell-whaley.com</a></p> <p>Henrietta U. Golding  BURR FORMAN MCNAIR  P. O. Box 336  Myrtle Beach, SC 29578  <a href="mailto:hgolding@burr.com">hgolding@burr.com</a></p> <p>Andrew Spencer Platte  C. Alan Runyan  RUNYAN &amp; PLATTE, LLC  2015 Boundary Street, Suite 239  Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p> <p>Charles H. Williams  WILLIAMS &amp; WILLIAMS  P.O. Box 1084  Orangeburg, SC 29116-1084  <a href="mailto:chwilliams@williamsattys.com">chwilliams@williamsattys.com</a></p>
<p><i>The Protestant Episcopal Church of  The Parish of Saint Philip, in  Charleston, in the State of South  Carolina</i></p>	<p>W. Foster Gaillard  WOMBLE, BOND &amp; DICKINSON, LLP  P.O. Box 999  Charleston, SC 29402  <a href="mailto:Foster.gaillard@wbd-us.com">Foster.gaillard@wbd-us.com</a></p> <p>G. Mark Phillips  NELSON MULLINS RILEY &amp; SCARBOROUGH,  LLP  PO Box 1806  Charleston, SC 29402  <a href="mailto:mark.phillips@nelsonmullins.com">mark.phillips@nelsonmullins.com</a></p> <p>C. Alan Runyan, Esquire  Andrew S. Platte, Esquire  RUNYAN &amp; PLATTE, LLC  2015 Boundary Street, Suite 239  Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>


<p><b><i>The Protestant Episcopal Church, The Parish of Saint Michael, in Charleston, in the State of South Carolina</i></b></p>	<p>Henry E. Grimball WOMBLE, CARLYLE, SANDRIDGE &amp; RICE, LLP. P.O. Box 999 Charleston, SC 29402 <a href="mailto:henry.grimball@wbd-us.com">henry.grimball@wbd-us.com</a></p> <p>Andrew Spencer Platte C. Alan Runyan RUNYAN &amp; PLATTE, LLC 2015 Boundary Street, Suite 239 Beaufort, SC 29902 <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a> <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<p><b><i>The Trustees of The Protestant Episcopal Church in South Carolina</i></b></p>	<p>David Cox, Esquire BARNWELL WHALEY PATTERSON &amp; HELMS, LLC 288 Meeting Street Charleston, SC 29401 <a href="mailto:dcox@barnwell-whaley.com">dcox@barnwell-whaley.com</a></p> <p>Henrietta U. Golding BURR FORMAN MCNAIR P. O. Box 336 Myrtle Beach, SC 29578 <a href="mailto:hgolding@burr.com">hgolding@burr.com</a></p> <p>Andrew Spencer Platte RUNYAN &amp; PLATTE, LLC 2015 Boundary Street, Suite 239 Beaufort, SC 29902 <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p> <p>Charles H. Williams WILLIAMS &amp; WILLIAMS P.O. Box 1084 Orangeburg, SC 29116-1084 <a href="mailto:chwilliams@williamsattys.com">chwilliams@williamsattys.com</a></p>
<p><b><i>The Vestries and Churchwardens of The Parish of St. Andrews</i></b></p>	<p>Albert A. Lacour, III CLAWSON &amp; STAUBES, LLC 126 Seven Farms Drive Ste. 200</p>

	<p>Charleston, SC 29492  <a href="mailto:alacour@clawsonandstaubes.com">alacour@clawsonandstaubes.com</a></p>
<p><i>The Vestry and Church Wardens of St. Jude's Church of Walterboro</i></p>	<p>Andrew Spencer Platte  C. Alan Runyan  RUNYAN &amp; PLATTE, LLC  2015 Boundary Street, Suite 239  Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<p><i>The Vestry and Church Wardens of The Church of The Parish of St. Helena and The Parish Church of St. Helena Trust</i></p>	<p>Andrew Spencer Platte  C. Alan Runyan  RUNYAN &amp; PLATTE, LLC  2015 Boundary Street, Suite 239  Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>
<p><i>The Vestry and Church Wardens of The Parish of St. Matthew</i></p>	<p>Francis Marion Mack  656 Fort Motte Road  Saint Matthews, SC 29135  <a href="mailto:fmmack@windstream.net">fmmack@windstream.net</a></p>
<p><i>The Vestry and Wardens of St. Paul's Church, Summerville</i></p>	<p>P. Brandt Shelbourne  SHELBOURNE LAW FIRM  131 E. Richardson Avenue  Summerville, SC 29483  <a href="mailto:brandt@shelbournelaw.com">brandt@shelbournelaw.com</a></p>
<p><i>Trinity Church of Myrtle Beach</i></p>	<p>James K. Lehman  NELSON MULLINS RILEY &amp; SCARBOROUGH,  LLP  PO Box 11070  Columbia, SC 29211  <a href="mailto:jim.lehman@nelsonmullins.com">jim.lehman@nelsonmullins.com</a></p> <p>Susan MacDonald, Esquire  NELSON, MULLINS, RILEY &amp; SCARBOROUGH,  LLP  BNC Bank Corporate Center, Suite 300  3751 Robert M. Grissom Parkway  Myrtle Beach, SC 29577  <a href="mailto:susan.macdonald@nelsonmullins.com">susan.macdonald@nelsonmullins.com</a></p>

<p><i>Trinity Episcopal Church</i></p>	<p>David Booth Beers  Mary E. Kostel  GOODWIN PROCTER LLP  901 New York Avenue, NW  Washington, DC 20001  <a href="mailto:mkostel@goodwinlaw.com">mkostel@goodwinlaw.com</a>  <a href="mailto:dbeers@goodwinlaw.com">dbeers@goodwinlaw.com</a></p> <p>Allan R. Holmes, Sr.  Timothy O. Lewis  GIBBS &amp; HOLMES  171 Church Street, Suite 110  Charleston, SC 29401  <a href="mailto:aholmes@gibbs-holmes.com">aholmes@gibbs-holmes.com</a>  <a href="mailto:timolewis@gibbs-holmes.com">timolewis@gibbs-holmes.com</a></p> <p>Jason S. Smith  HELLMAN, YATES &amp; TISDALE  105 Broad Street, 3<sup>rd</sup> Floor  Charleston, South Carolina 29401  <a href="mailto:js@hellmanyates.com">js@hellmanyates.com</a></p>
<p><i>Trinity Episcopal Church, Pinopolis</i></p>	<p>P. Brandt Shelbourne  SHELBOURNE LAW FIRM  131 E. Richardson Avenue  Summerville, SC 29483  <a href="mailto:brandt@shelbournelaw.com">brandt@shelbournelaw.com</a></p> <p>John B. Williams  Williams &amp; Hulst, LLC  PO Box 1288  Moncks Corner, SC 29461  <a href="mailto:jbw@williamsandhulst.com">jbw@williamsandhulst.com</a></p>
<p><i>Vestry and Church Wardens of the Episcopal Church of The Parish of Christ Church</i></p>	<p>Edward P. Guerard, Jr.  1106 Port Harbor Court  Mt. Pleasant, SC 29464  <a href="mailto:tguerardjr@gmail.com">tguerardjr@gmail.com</a></p> <p>Allan P. Sloan, III  Pierce, Sloan, Wilson, Kennedy &amp; Early, LLC  PO Box 22437  Charleston, SC 29413  <a href="mailto:chipsloan@piercesloan.com">chipsloan@piercesloan.com</a></p>

	<p>Joseph c. Wilson IV  Joseph C. Wilson Law Firm LLC  PO Box 178  Folly Beach, SC 29439  <a href="mailto:jcamwilsoniv@gmail.com">jcamwilsoniv@gmail.com</a></p>
<p><i>Vestry and Church Wardens of The  Episcopal Church of the Parish of  St. John's, Charleston County</i></p>	<p>Andrew Spencer Platte  C. Alan Runyan  RUNYAN &amp; PLATTE, LLC  2015 Boundary Street, Suite 239  Beaufort, SC 29902  <a href="mailto:arunyan@runyanplatte.com">arunyan@runyanplatte.com</a>  <a href="mailto:aplatte@runyanplatte.com">aplatte@runyanplatte.com</a></p>

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Columbia, South Carolina

December 31, 2020

## Eileen Hindman

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**From:** Eileen Hindman  
**Sent:** Thursday, December 31, 2020 3:19 PM  
**To:** aholmes@gibbs-holmes.com; alacour@clawsonandstaubes.com; aplatte@runyanplatte.com; arunyan@runyanplatte.com; bdurant@sowelldurant.com; billbryan@bryanandhaar.net; brandt@shelbournelaw.com; bscott@pslawpc.com; bsowell@sowelldurant.com; butsey@pmped.com; chipsloan@piercesloan.com; chwilliams@williamsattys.com; dave@marvel.lawyer; david@devanemacklaw.com; dbeers@goodwinlaw.com; dcox@barnwell-whaley.com; fmmack@windstream.net; Foster.gaillard@wbd-us.com; henry.grimball@wbd-us.com; hgolding@burr.com; hreasterling@gmail.com; ikeithmccarty@gmail.com; jbw@williamsandhulst.com; jcamwilsoniv@gmail.com; Jim Lehman; js@hellmanyates.com; katie@monoclaw.com; kbarnes@barneslawfirm.com; Mark Phillips; mevans14@bellsouth.net; mkostel@goodwinlaw.com; pcampbell@turnerpadget.com; rhorger@hbrllp.com; Susan MacDonald; tdavis@harveyandbattey.com; tguerardjr@gmail.com; timolewis@gibbs-holmes.com; tst@hellmanyates.com; walljohn@bellsouth.net  
**Cc:** Mitch Brown  
**Subject:** Appellate Case No. 2020-000986 - The Protestant Episcopal Church v. The Episcopal Church  
**Attachments:** 2020.12.31 (FINAL) Consent Motion for Second Extension to File Respondents' Initial Brief with attachment and proof of service [2020-00986] - 4837-0527-6117 1.pdf

Good morning,

Attached for service in the above matter please find the Consent Motion for Second Extension to File Respondents' Initial Brief. Service is made via email pursuant to subsection (g)(3) of Supreme Court Administrative Order 2020-05-29-02.

Thank you,



EILEEN HINDMAN SENIOR ADMINISTRATIVE ASSISTANT

eileen.hindman@nelsonmullins.com

MERIDIAN | 17TH FLOOR

1320 MAIN STREET | COLUMBIA, SC 29201

T 803.255.9204 F 803.256.7500

NELSONMULLINS.COM