

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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**RECEIVED**

**Feb 12 2021**

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

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S.C. SUPREME COURT

Appellate Case No. 2020-000986

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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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**RESPONDENT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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1. Consent Temporary Injunction dated January 31, 2013
2. 2<sup>nd</sup> Amended Complaint of March 4, 2013.
3. TEC's Answer and Counterclaims to 2<sup>nd</sup> Amended Complaint of March 28, 2013.
4. TECSC's Answer and Counterclaims to 2<sup>nd</sup> Amended Complaint of March 28, 2013.
5. Order of June 10, 2013 (Granting Motion to Remand)
6. Order of September 27, 2013 (Denying Defendants Motion to Join Additional Counterclaim Defendants)

7. Order of December 31, 2013 (Denying Motion to Reconsider)
8. Order of February 3, 2015 (Judge Goodstein)
9. Initial Brief of Appellants dated May 15, 2015
10. Initial Brief of Respondents dated June 15, 2015
11. Initial Appellant's Reply Brief dated June 25, 2015
12. Motion to Argue Against Precedent dated September 8, 2015
13. Order Granting Motion to Argue Against Precedent dated September 9, 2015.
14. Petition for Rehearing by all Respondents filed September 1, 2017.
15. S. C. Supreme Court Order dated November 17, 2017, (Denying Petition for Rehearing)
16. S.C. Supreme Court Order date November 17, 2017, (Denying Motion to Recuse)
17. Bishops vonRosenberg's and Adam's Motion to Amend their Complaint to Join Parties and Claims, ECF No. 124. March 1, 2018
18. TEC's Motion to Amend its Amended Complaint-In-Intervention to Join Parties and Claims, ECF No. 125, March 1, 2018.
19. District Court Order and Opinion, ECF No. 140, April 16, 2018.
20. TEC Brief for Respondents In Opposition. May 7, 2018.
21. Transcript of Hearing, November 19, 2018 p. 41,42.
22. Plaintiffs Analysis of Collective Opinions dated January 16, 2019.
23. Plaintiffs submission to court concerning Dennis Canon and Exhibit 1 (TEC Response to Parishes 1<sup>st</sup> RFAs of 10/8/13) January 18, 2019.
24. Defendants' Submission in Response to the Court's Request. (Justice's Opinion review.) January 22, 2019.

25. Return to Petition for Writ of Mandamus, SC Supreme Court. April 11, 2019.
26. S.C. Supreme Court Order, June 28, 2019, (Denying Petition for Writ of Mandamus).
27. Transcript of Hearing, July 21, 2019, pp. 23-39.
28. District Court Order and Opinion, ECF No. 667, September 19, 2019.
29. Defendants' Response to Court's Request re Accession Proof in The Record. February 21, 2020.
30. Defendants' Petition for Writ of Prohibition. SC Supreme Court. February 21, 2020.
31. Order of June 19, 2020 (Judge Dickson)
32. Mot. To Stay Case p. 4, vonRosenberg v. Lawrence, No. 19-2112 (4th Cir. Oct. 16, 2020)
33. Order, vonRosenberg v. Lawrence No. 19-2112 (4th Cir. Oct. 27, 2020)

**TRIAL TRANSCRIPT PAGES & EXHIBITS**

34. Trial Transcript 1-2523.
35. DSC Exhibit 30. D-24 Exhibit 6, 2006 C&C.

**COURT EXHIBIT 1, INDIVIDUAL RESPONDENT/PARISH DESIGNATIONS:**

**Church Of The Cross, Inc. and Church Of The Cross Declaration of Trust**  
7/14/14 Trial Tr., pp. 1096-1101, Exhibits TC-1 thru 15

**The Church Of Our Saviour, Of The Diocese Of South Carolina**  
7/14/14 Trial Tr., pp. 972-975, Exhibits OS-1 thru 17, D-OS-51, D-OS-52, D-OS-63, D-OS-65, D-OS-66

**St. Davids Church**  
7/11/14 Trial Tr., pp. 683, 710-723, 897,930, 2136, 2258. Depo. pp. 20,21,46. Exhibits SD-1 thru 17. D-SD-3, S-SD-4.

**The Church of The Epiphany**  
7/9/14 Trial Tr., pp. 405-431, Exhibits E-1 thru 9

**The Vestry and Church Wardens Of The Episcopal Church Of The Parish Of St. Helena And The Parish Church Of St. Helena Trust**

7/11/14 Trial Tr., pp. 737-758, Exhibits PCSH-1 thru 34 (PCSH-34, pp. 7/7/1784 minutes). D-PCSH-42.

**The Vestry and Church Wardens of St. Jude's Church of Walterboro**

7/14/14 Trial Tr., pp. 948-951, Exhibits SJ-1 thru 15, D-SJ-37.

**Trinity Episcopal Church, Edisto Island**

7/15/14 Trial Tr., pp. 1223-1227, Exhibits TED-1 thru 19. D-TED-13.

**Vestry and Church Wardens Of The Episcopal Church Of The Parish Of St. John's, Charleston County**

7/15/14 Trial Tr., pp. 1142-1147, Exhibits SJC-1 thru 20. D-SJC-21, D-SJC-25.

**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**

7/14/14 Trial Tr., pp. 992-998, 999. Exhibits SMI-1 thru 27, D-SMI-23.

**The Vestries and Churchwardens of the Parish of St. Andrew (hereinafter "Old St. Andrews Parish Church" or "OSA")**

7/15/14 Trial Tr. pp. 1189-1192, Exhibits OSA-1 thru 13, D-OSA-6, D-OSA-8, D-OSA-11

**All Saints Protestant Episcopal Church, Inc.**

7/9/14 Trial Tr., pp. 287-311, 312-313. Exhibits AS-1 thru 9. D-AS-6, D-AS-24.

**St. Bartholomew's Episcopal Church**

7/11/14 Trial Tr., pp. 759-773, Exhibits SB-1 thru 16. D-SB-12.

**The Church of the Holy Cross-Stateburg**

7/14/14 Tr. Transcript, Pgs. 919-923, 925-926. Exhibits HCS-1 thru 16.

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

7/9/14 Trial Tr., pp. 316-337, 348, 353-355, 7/23/14 Trial Tr. pp. 2224-2226. Exhibits CSP-1 thru 16. D-CSP-2.

**Church Of The Holy Comforter**

7/10/14 Trial Tr., pp. 516-526 & 530-559, Exhibits HC-1 thru 24, 26 thru 27. D-HC-06, D-HC-26, D-HC-27.

**Church Of The Redeemer**

7/10/14 Trial Tr., pp. 624-643, 644, 650, 654, Exhibits R-1 thru 26.

**Holy Trinity Episcopal Church**

7/15/14 Trial Tr., pp. 1176-1182, Exhibits HT 1 thru 22.  
D-HT-33, D-HT-34, D-HT-35, D-HT-38.

**The Church Of The Good Shepherd, Charleston, SC**

7/14/14 Trial Tr., pp. 957-961, Good Shepherd Stipulations 1 thru 22.  
Exhibits GS 1 thru 18  
7/15/14 Trial Tr., pp.1233-1234, Exhibit GS-19.

**St. Paul's Episcopal Church of Bennettsville, Inc.**

7/14/14 Trial Tr., pp. 930-938, 7/23/14, p. 2281; Exhibits SPB 1 thru 18. D-SPB-28.

**St. James' Church, James Island, S.C.**

7/11/14 Trial Tr., pp. 864-872, SJJI-1 thru 6, 8, 9 and 12.  
D-SJJI-36, D-SJJI-37, D-SJJI-38.

**The Church of St. Luke and St. Paul, Radcliffeboro**

7/10/14 Trial Tr., pp. 480, line 7 thru 498, line 4. Exhibits SLP 1 thru 17.  
D-SLP-13.

**The Church Of The Resurrection, Surfside**

7/10/14 Trial Tr., pp. 582-611, 623-24, Exhibits RS-1, RS-6 thru 11, RS-13-  
RS-20, Depo p. 28.

**The Protestant Episcopal Church, Of The Parish Of St. Philip, In Charleston,  
In The State of South Carolina**

7/15/14, Trial Tr.: pp. 1199, ln. 15-25; 1200-1216; 1217, ln. 1-23; 1219, ln. 7-25;  
1220; 1221, ln. 1-8; 1222, ln 4-25; 1223, ln 1-2, Exhibits SPH 1 thru 43. Also, D-  
6, D-512, pp. 867-876 of BCP.

**The Vestry and Church Wardens Of The Episcopal Church Of The Parish Of  
St. Matthew**

7/14/14 Trial Tr., pp. 982 lines 15 thru 988 line 23. Exhibits SMFM 1 thru 18. D-  
SF-FM-3.

**The Vestry and Wardens Of St. Paul's Church, Summerville**

7/14/14 Trial Tr.: pp. 1051, ln. 13 – 21, 1052, ln. 8 – 1064, Ln. 18. Exhibits SPS -  
1 thru 29.

**Trinity Church of Myrtle Beach**

7/11/14 Trial Tr., pp. 800-807, 809-816; TMB Exhibits 1 thru 26. D-TMB-26.

**Vestry and Church-Wardens Of The Episcopal Church Of The Parish Of Christ Church**

7/14/14 Trial Tr., pp. 1111 line 8 through p. 1114 line 4, 1116 line 21 through Pg. 1118 line 25. 7/15/14, Trial Tr., pp. 1130 line 6 through Pg. 1131 line 3. Exhibits CC-1 thru 38. D-CC-6.

**Trinity Episcopal Church, Pinopolis**

7/11/14 Trial Tr., pp. 691-710, Exhibits TP-1 thru 14. D-TP-31, D-401A.

**St. Luke's Church, Hilton Head Island**

7/10/14 Trial Tr., pp. 446-452, 464-465, 466; Exhibits SL-1 thru 15.

We certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

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Dated: February 12, 2021