

**RECEIVED**

**May 05 2022**

**S.C. SUPREME COURT**

**THE STATE OF SOUTH CAROLINA  
In The Supreme Court**

---

**APPEAL FROM DORCHESTER COUNTY  
Edgar W. Dickson, Circuit Court Judge**

---

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 St. Jude's Church of Walterboro; 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.

---

**CERTIFICATE OF SERVICE**

---

I certify this 5th day of May, 2022, that I have served copies of the Petition for Rehearing

upon other counsel of record via email, addressed to the following:

Francis M. Mack, Esq.  
656 Fort Motte Road  
Saint Matthews, SC 29135  
[frnmack@windstream.net](mailto:frnmack@windstream.net)  
Attorney for Vestry/Wardens — Episcopal Church/St. Matthews Parish

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. Grimbball, Esquire  
WOMBLE Bond Dickison (US) LLP  
P.O. Box 999  
Charleston, SC 29402  
[henry.grimbballwbd-us.com](http://henry.grimbballwbd-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. Box336  
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

Albert A. Lacour, III, Esquire  
CLAWSON & STAUBES, LLC  
126 Seven Farms Drive, Ste. 200  
Charleston SC 29492  
[alacour@clawsonandstaubes.com](mailto:alacour@clawsonandstaubes.com)  
Attorney for The Vestries and Churchwardens of The Parish of St. Andrews

Charles H. Williams, Esquire  
WILLIAMS & WILLIAMS  
PO Box 1084  
Orangeburg SC 29116-1084  
[chwilliams@williamsattys.com](mailto:chwilliams@williamsattys.com)  
Attorney for The Protestant Episcopal Church in the Diocese of South Carolina and The Trustees  
of the Protestant Episcopal Church in South Carolina

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

Timothy O'Neill Lewis, Esquire  
GIBBS & HOLMES  
PO Box 938  
Charleston, SC 29402-0938  
[timolewis@gibbs-holmes.com](mailto:timolewis@gibbs-holmes.com)  
Attorney for Trinity 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

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

---

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

Thomas S. Tisdale, Jr., Esquire  
LAW OFFICES OF THOMAS S. TISDALE, LLC  
4 North Atlantic Wharf, Suite 100  
Charleston, SC 29401  
[tst@chancellorsc.com](mailto:tst@chancellorsc.com)  
Attorney for The Episcopal Church in South Carolina

David. Booth Beers, Esquire  
GOODWIN PROCTER LLP  
901 New York Avenue, N. W.  
Washington, DC 20001  
[dbeers@goodwinprocter.com](mailto:dbeers@goodwinprocter.com)  
Attorney for The Episcopal Church

Mary E. Kostel, Esquire  
Chancellor to the Presiding Bishop  
THE EPISCOPAL CHURCH  
3737 Seminary Road PMB 200  
Alexandria, VA 22304  
Attorney for The Episcopal Church  
[mkostel@episcopalchurch.org](mailto:mkostel@episcopalchurch.org)

Allan R. Holmes, Sr., Esquire  
GIBBS & HOLMES  
Suite 110, 171 Church Street  
Charleston, SC 29401  
[aholmes@gibbs-holmes.com](mailto:aholmes@gibbs-holmes.com)  
Attorney for The Episcopal Church

Kathleen Fowler Monoc, Esquire  
MONOC LAW LLC  
77 Grove Street  
Charleston, SC 29403  
[katie@monoroberts.com](mailto:katie@monoroberts.com)  
Attorney for The Episcopal Church in South Carolina

---

Bert Glenn Utsey, III, Esquire  
CLAWSON FARGNOLI UTSEY, LLC  
2 Amherst Street  
Charleston, SC 29403  
[bert@cfulaw.com](mailto:bert@cfulaw.com); [hilda@fulaw.com](mailto:hilda@fulaw.com)  
Attorney for The Episcopal Church in South Carolina

Kathleen Chewing Barnes, Esquire  
BARNES LAW FIRM, LLC  
PO Box 897  
Hampton, SC 29924  
[kbarnes@barneslawfirm.com](mailto:kbarnes@barneslawfirm.com)  
Attorney for The Episcopal Church in South Carolina

TURNER PADGET GRAHAM & LANEY, P.A.

By: s/ C. Pierce Campbell  
C. Pierce Campbell (SC Bar No. 72539)  
Post Office Box 5478  
Florence, SC 29502-5478  
Phone: (843) 656-4429  
Fax: (843) 413-5837  
[pcampbell@turnerpadget.com](mailto:pcampbell@turnerpadget.com)  
ATTORNEYS FOR RESPONDENT

Florence, S.C.  
May 5, 2022

## Thomas, Mary E

---

**From:** Thomas, Mary E  
**Sent:** Thursday, May 5, 2022 1:54 PM  
**To:** 'frnmack@windstream.net'; 'chipsloan@piercesloan.com';  
'tdavis@harveyandbattey.com'; 'arunyan@runyanplatte.com';  
'aplatte@runyanplatte.com'; 'susan.macdonald@nelsonmullins.com';  
'walljohn@bellsouth.net'; 'mark.phillips@nelsonmullins.com'; 'mevans14@bellsouth.net';  
'jim.lehman@nelsonmullins.com'; 'bscott@pslawpc.com'; 'david@devanemacklaw.com';  
'dave@marvel.lawyer'; 'henry.grimball@wbd-us.com'; 'brandt@shelbournelaw.com';  
'dcox@barnwell-whaley.com'; 'chwilliams@williamsattys.com'; 'hgolding@burr.com';  
'rhorger@hbrllp.com'; 'bsowell@sowelldurant.com'; 'bdurant@sowelldurant.com';  
'jcamwilsoniv@gmail.com'; 'billbryan@bryanandhaar.net';  
'alacour@clawsonandstaubes.com'; 'chwilliams@williamsattys.com';  
'ikeithmccarty@gmail.com'; 'timolewis@gibbs-holmes.com'; 'hreasterling@gmail.com';  
'foster.gaillard@wbd-us.com'; 'tguerardjr@gmail.com';  
'mitch.brown@nelsonmullins.com'; 'jbw@williamsandhulst.com'; 'tst@chancellorsc.com';  
'dbeers@goodwinprocter.com'; 'aholmes@gibbs-holmes.com';  
'katie@monoroberts.com'; 'bert@cfulaw.com'; 'kbarnes@barneslawfirmssc.com';  
'hilda@fulaw.com'; 'mkostel@episcopalchurch.org'  
**Cc:** Campbell, C. Pierce  
**Subject:** 2020-000986 The Protestant Episcopal Church v. The Episcopal Church  
**Attachments:** Church of Holy Cross, Stateburg - Service of Petition for Rehearing.pdf

Counsel,

Attached for service upon you in the matter is Church of the Holy Cross, Stateburg's Petition for Rehearing, along with cover letter and Certificate of Service. Service is made via email pursuant to the Supreme Court Order 2021-08-25-02.

**Turner Padget**

Mary Thomas  
Secretary  
PO Box 5478 | Florence, SC 29502  
1831 West Evans Street, Suite 400 | Florence, SC 29501  
843-656-4457 | Fax 843-413-5858  
mthomas@turnerpadget.com  
[vCard](#) | [Location](#)

# Turner Padget

**C. Pierce Campbell**

REPLY TO  
E-Mail: PCampbell@TurnerPadget.com  
Writer's Direct Dial: (843) 656-4429  
Writer's Direct Fax: (843) 413-5837

May 5, 2022

ALL COUNSEL OF RECORD

Re: The Protestant Episcopal Church v. The Episcopal Church  
Appellate Case No. 2020-000986

Dear Counsel:

Enclosed for your files please find a copy of Church of the Holy Cross, Stateburg's Petition for Rehearing, along with Certificate of Service, both of which are being e-filed with the Court this date.

Yours very truly,

TURNER PADGET GRAHAM AND LANEY P.A.

C. Pierce Campbell

CPC/met  
Enclosures