

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

The Right Reverend Charles G.)
vonRosenberg, individually and in his)
capacity as the former Provisional Bishop of)
The Episcopal Church in South Carolina and)
The Right Reverend Gladstone B. Adams, III,)
individually and in his capacity as the)
Provisional Bishop of The Episcopal Church)
in South Carolina,)
Plaintiffs,)
The Episcopal Church,)
Plaintiff in Intervention)
vs.)
The Right Reverend Mark J. Lawrence, et al.)
Defendants.)
)
)
)
)

**CIVIL ACTION NUMBER:
2:13-cv-00587-RMG**

**DEFENDANTS, CHURCH OF THE
CROSS, INC. AND CHURCH OF THE
CROSS DECLARATION OF TRUST,
CHURCH OF OUR SAVIOUR, IN THE
DIOCESE OF SOUTH CAROLINA,
HOLY TRINITY, GRAHAMVILLE, ST.
ALBAN’S CHAPEL, ST. ANDREW’S
MISSION, ST. JOHN’S EPISCOPAL,
CHARLESTON, THE VESTRY AND
CHURCH WARDENS OF ST. JUDE’S
CHURCH OF WALTERBORO’S
MOTION FOR SUMMARY
JUDGMENT**

Church of the Cross, Inc. and Church of the Cross Declaration of Trust, The Church of Our Saviour, in the Diocese of South Carolina, Holy Trinity, Grahamville, St. Alban’s Chapel, St. Andrew’s Mission, St. John’s Episcopal, Charleston, and The Vestry and Church Wardens of St. Jude’s Church of Walterboro (collectively “Defendants”) respectfully moves for summary judgment under Rule 56 of the Federal Rules of Civil Procedure against Plaintiffs, The Episcopal Church (“TEC”) and The Episcopal Church in South Carolina, The Right Reverend Charles G. vonRosenberg and The Right Reverend Gladstone B. Adams, III (“TECSC”) on the grounds that there are no disputed issues of material fact and that the cause of action in TEC’s Second Amended

Complaint-in-Intervention and TECSC's Third Amended Complaint should be decided as a matter of law, as detailed in Defendants' Memorandum of law in support on this motion.

December 7, 2018

Respectfully submitted,

/s/C. Alan Runyan
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The Vestry and Church Wardens of the Episcopal Church of the Parish of St. Helena and the Parish Church of St. Helena Trust; The Parish of Saint Michael in Charleston, In The State of South Carolina and St. Michael's Church Declaration of Trust; Vestry and Church Wardens of the Episcopal Church of the Parish of St. John's Charleston County; Trinity Episcopal Church; The Vestries and Churchwardens of the Parish of St. Andrew