

**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' MOTION TO
) EXCLUDE TESTIMONY AND
) REPORTS OF ROBERT L. KLEIN**

TO: PLAINTIFFS, THE EPISCOPAL CHURCH, THE EPISCOPAL CHURCH IN SOUTH CAROLINA, THE RIGHT REVEREND CHARLES G. VONROSENBERG, THE RIGHT REVEREND GLADSTONE B. ADAMS, III AND THEIR COUNSEL OF RECORD

COMES NOW, Defendants, The Rt. Rev. Mark J. Lawrence, The Protestant Episcopal Church In The Diocese of South Carolina; and The Trustees of the Protestant Episcopal Church of South Carolina; Church of The Cross, Inc. and Church of the Cross Declaration of Trust, The Church of Our Saviour, of the Diocese of South Carolina, The Protestant Episcopal Church, of the Parish of Saint Philip, in Charleston 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, Trinity Episcopal Church, Edisto Island, St. David's Church, Vestry and Church Wardens of the Episcopal Church of the Parish of St. John's Charleston County, Vestry and Church Wardens of St. Jude's Church of Walterboro, The Vestries and Churchwardens of the Parish of St. Andrew, Old Saint Andrews Parish Church; Holy Trinity, Grahamville; St. Alban's Chapel, The Citadel; St. John's Episcopal, Charleston; St. Andrew's Mission; All Saints Protestant Episcopal Church, Inc.; St. Bartholomews Episcopal Church; The Church of the Holy Cross; The Vestry and Church Wardens of The Parish of St. Matthew Holy Apostles, Barnwell; St. James Anglican, Blackville; St. Barnabas, Dillon; Ascension, Hagood; St. Paul's Orangeburg; Historic Church of the Epiphany, St. Johns, Berkeley; Christ St. Paul's Episcopal Church; Church Of The Holy Comforter; St. Matthias Episcopal Church, Inc.; St. Matthews Church; Christ Episcopal Church, Mars Bluff Community, Florence County, South Carolina; Trinity Episcopal Church, Pinopolis; Church Of The Redeemer; Holy Trinity Episcopal Church; The Church Of The Good Shepherd, Charleston, SC; St. Paul's Episcopal Church of Bennettsville, Inc.; St. James' Church, James Island, S.C.; The Church of St. Luke and St. Paul, Radcliffeboro; The Church Of The Resurrection, Surfside; The Protestant Episcopal Church, Of The Parish Of St. Philip, In Charleston, In The State of South Carolina; The Vestry and Wardens Of St. Paul's Church, Summerville; St. Timothy's, Cane Bay; Trinity Church of Myrtle Beach; Vestry and Church-Wardens Of The Episcopal Church Of The Parish Of Christ Church; St. Luke's Church; Grace Parish, North Myrtle Beach; Christ the King, Waccamaw; The Vestry and Church Wardens Of The Episcopal Church Of The Parish Of Prince George Winyah; St. John's Episcopal Church of Florence, S.C.; Church of the Advent, Marion; St. Paul's Episcopal Church of Conway; The Well Ministries; and Church of the Holy Cross, Sullivan's Island; (collectively "The

Defendants) by and through their undersigned attorneys, and pursuant to Rule 702 of the Federal Rules of Evidence move before this Honorable Court for an order precluding the Plaintiffs from presenting opinion testimony from Plaintiffs' purported expert, Robert L. Klein. In support of this Motion, Defendants incorporates herein *Defendants' Joint Memorandum in Support of Motion to Exclude Testimony and Reports of Robert L. Klein*.

Respectfully submitted,

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