



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 Plaintiff from presenting opinion testimony from Plaintiffs’ purported expert, Dr. Walter Edgar. In support of this Motion, Defendants incorporates herein *Defendants’ Joint Memorandum in Support of Motion to Exclude Testimony and Reports of Dr. Walter Edgar*.

December 7, 2018

Respectfully submitted,

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