

**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, THE PROTESTANT EPISCOPAL CHURCH OF THE PARISH OF SAINT MICHAEL, IN CHARLESTON, IN THE STATE OF SOUTH CAROLINA, VESTRY AND CHURCH WARDENS OF THE EPISCOPAL CHURCH OF THE PARISH OF ST. HELENA, 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, AND TRINITY EPISCOPAL CHURCH
MOTION FOR SUMMARY JUDGMENT**

Defendants, The Protestant Episcopal Church of the Parish of Saint Michael, in Charleston, in the State of South Carolina, Vestry and Church Wardens of The Episcopal Church of the Parish of St. Helena, 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, and Trinity Episcopal Church (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

C. Alan Runyan, Esq.

Andrew S. Platte, Esq.

RUNYAN & PLATTE, LLC

2015 Boundary Street, Suite 239

Beaufort, SC 2902

(843)-473-6800

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