

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

In re:)	Case Nos.:	CL 2007-248724,
Multi-Circuit Episcopal Church Litigation)		CL 2006-15792,
)		CL 2006-15793,
)		CL 2007-556,
)		CL 2007-1235,
)		CL 2007-1236,
)		CL 2007-1237,
)		CL 2007-1238,
)		CL 2007-1625,
)		CL 2007-5249,
)		CL 2007-5250,
)		CL 2007-5362,
)		CL 2007-5363,
)		CL 2007-5364,
)		CL 2007-5682,
)		CL 2007-5683,
)		CL 2007-5684,
)		CL 2007-5685,
)		CL 2007-5686,
)		CL 2007-5902,
)		CL 2007-5903, and
)		CL 2007-11514

MOTION TO RECONSIDER
PART OF THE LETTER OPINION ON THE COURT'S FIVE QUESTIONS

The Protestant Episcopal Church in the Diocese of Virginia (the “Diocese”) and the Episcopal Church respectfully move that the Court reconsider part of its Letter Opinion on the Court’s Five Questions (June 27, 2008). Specifically, we ask that the Court reconsider its holding that Virginia law does not allow any unincorporated religious entity other than a local congregation to be the beneficiary of a trust. *See id.* at 12-14.

The Diocese and the Episcopal Church have stated the grounds for this Motion and provided the arguments and authorities we wish the Court to consider in support thereof in briefing previously filed. *See* The Episcopal Church’s and the Diocese’s Opening Post-Trial Brief Regarding Church of the Word (filed Oct. 29, 2008) at 4-11. Pursuant to the Fairfax

Circuit Court practices and procedures regarding Motions for Reconsideration, no hearing has been scheduled on this Motion.

WHEREFORE, for the foregoing reasons, the Court should reconsider the aforementioned part of its Letter Opinion on the Court's Five Questions and hold that any unincorporated religious entity may be the beneficiary of a trust.

Respectfully submitted,

THE PROTESTANT EPISCOPAL CHURCH
IN THE DIOCESE OF VIRGINIA

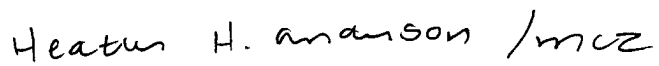
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were sent by electronic mail to all counsel named below and by first-class mail to the lead counsel at each firm (indicated with an asterisk below), on this 10th day of November, 2008:

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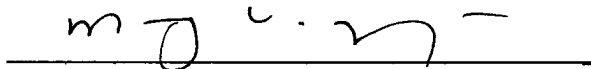
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A handwritten signature in black ink, appearing to read "W. E. Thro", is written above a solid horizontal line.

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