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May 12, 2008

Office of the Clerk  
Attn: Ms. Robin Brooks  
Circuit Court of Fairfax County  
Fairfax Judicial Center  
4110 Chain Bridge Rd  
Fairfax, Virginia 22030-4009

In Re: *Multi-Circuit Church Property Litigation* (Omnibus Case No. CL 2007-0248724)

Dear Ms. Brooks:

Enclosed for filing in the Omnibus Case No. CL 2007-0248724, is an original Motion of the Dioceses of Southern Virginia and Southwestern Virginia For Leave To Join Amici Curae Brief in Regard to Constitutional Issues, along with a Cover Sheet for filing in Case Nos.:

1. *In re: Truro Church* (Circuit Court of Fairfax County; CL 2006-15792);
2. *In re: Church of the Apostles* (Circuit Court of Fairfax County; CL 2006-5793);
3. *In re: Church of the Epiphany* (Circuit Court of Fairfax County; CL2007-556);
4. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of the Epiphany, Herndon* (Circuit Court of Fairfax County; CL 2007-1235);
5. *The Protestant Episcopal Church in the Diocese of Virginia v. Truro Church* (Circuit Court of Fairfax County; CL 2007-1236);

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May 12, 2008  
Page 2

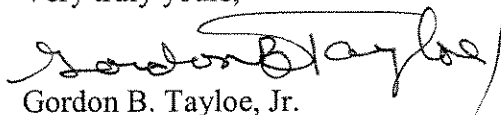
6. *The Protestant Episcopal Church in the Diocese of Virginia v. Christ the Redeemer Church* (Circuit Court of Fairfax County; CL 2007-1237);
7. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of the Apostles* (Circuit Court of Fairfax County; CL 2007-1238);
8. *The Episcopal Church v. Truro Church et al.* (Circuit Court of Fairfax County; CL 2007-1625);
9. *In re: Church at the Falls, The Falls Church* (Circuit Court of Fairfax County; CL 2007-5249);
10. *The Protestant Episcopal Church in the Diocese of Virginia v. The Church at the Falls - The Falls Church* (Circuit Court of Arlington County Case No. 07-125) (Circuit Court of Fairfax County; CL 2007-5250);
11. *The Protestant Episcopal Church in the Diocese of Virginia v. Potomac Falls Church* (Circuit Court of Loudoun County Case No. 44149) (Circuit Court of Fairfax County; CL 2007-5362);
12. *In re: Church of Our Saviour at Oatlands* (Circuit Court of Fairfax County; CL 2007-5363);
13. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of Our Saviour at Oatlands* (Circuit Court of Loudoun County Case No. 44148) (Circuit Court of Fairfax County; CL 2007-5364);
14. *The Protestant Episcopal Church in the Diocese of Virginia v. St Margaret's Church* (Circuit Court of Prince William Case No. CL73465) (Circuit Court of Fairfax County; CL 2007-5682);
15. *The Protestant Episcopal Church in the Diocese of Virginia v. St. Paul's Church, Haymarket* (Circuit Court of Prince William County Case No. 73466) (Circuit Court of Fairfax Virginia CL 2007-5683);

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Page 3

16. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of the Word* (Circuit Court of Prince William County Case No. 73464) (Circuit Court of Fairfax Virginia CL 2007-5684);
17. *In re: St. Margaret's Church* (Circuit Court of Fairfax County CL 2007 -5685);
18. *In re: St. Paul's Church, Haymarket* (Circuit Court of Fairfax County CL 2007-5686);
19. *The Protestant Episcopal Church in the Diocese of Virginia v. St. Stephen's Church* (Circuit Court of Northumberland County Case No. CL 07-16) (Circuit Court of Fairfax County CL 2007-5902);
20. *In re: St. Stephen's Church*; (Circuit Court of Fairfax County CL 2007-5903); and
21. *In re: Church of the Word, Gainesville* (Circuit Court of Fairfax County CL 2007-11514).

Very truly yours,

  
Gordon B. Tayloe, Jr.

Enclosures

Cc: Please see attached Certificate of Service in  
Multi-Circuit Church Property Litigation  
(Omnibus Case No. CL 2007-0248724)

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

|  |   |                   |                   |
|--|---|-------------------|-------------------|
| <b>In re:</b>                                    | ) | <b>Case Nos.:</b> | CL 2007-248724,   |
| <b>Multi-Circuit Episcopal Church Litigation</b> | ) |                   | CL 2006-15792,    |
|  | ) |                   | CL 2006-15793,    |
|  | ) |                   | CL 2007-556,      |
|  | ) |                   | CL 2007-1235,     |
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|  | ) |                   | CL 2007-5686,     |
|  | ) |                   | CL 2007-5902,     |
|  | ) |                   | CL 2007-5903, and |
|  | ) |                   | CL 2007-11514     |

**MOTION OF THE DIOCESES OF SOUTHERN  
VIRGINIA AND SOUTHWESTERN VIRGINIA  
FOR LEAVE TO JOIN *AMICUS* BRIEF**

The Episcopal Diocese of Southern Virginia and the Episcopal Diocese of Southwestern Virginia (collectively “additional Diocesan *amici*”) respectfully move for leave to join in the *amici curiae* brief on the issue of the constitutionality of Virginia Code § 57-9(A) previously filed by the General Council on Finance and Administration of the United Methodist Church, *et al.* Additional Diocesan *amici* state the following in support of this motion.

**Statement of Interest**

The Episcopal Diocese of Southern Virginia was formed in 1892 as a spin off from the Diocese of Virginia. Today it comprises 122 Episcopal parishes and more than 170 Episcopal clergy, in a territory that stretches more than 300 miles from the Eastern Shore of Virginia

westward to Danville, and from the south side of the James River at Richmond to the North Carolina border, including the large metropolitan areas of Hampton Roads and Greater Richmond.

The Episcopal Diocese of Southwestern Virginia, the youngest of Virginia's three Episcopal Dioceses, was formed in 1919 when it was split off from the Episcopal Diocese of Southern Virginia. Today, the Diocese of Southwestern Virginia consists of large urban churches in Roanoke, Lynchburg, and the Radford-Blacksburg-Christiansburg triangle and small rural congregations located in the Shenandoah Valley, the Blue Ridge and Allegheny Mountains, the New River Valley and the Appalachian coal fields. The Diocese runs from Staunton to Bristol between West Virginia, Kentucky, and North Carolina.

Most of the parishes in the Dioceses of Southern Virginia and Southwestern Virginia are unincorporated and their property is titled in trustees appointed pursuant to Virginia Code § 57-8. Both dioceses therefore are keenly interested in the outcome of this litigation; if Virginia Code § 57-9(A) may be applied to the Diocese of Virginia, then it may also be applied to Virginia's other two Episcopal dioceses.

Both the Diocese of Southern Virginia and the Diocese of Southwestern Virginia are structured identically to the Diocese of Virginia, are component parts of the hierarchical denomination, The Episcopal Church in the United States of America, and are governed by its Constitutions and Canons. Both dioceses' governing documents, their Diocesan Constitution and Canons, contain provisions recognized by the United States Supreme Court as both legitimate mechanisms for protecting a hierarchical church's interest in local church property and as mechanisms which civil courts are "bound" to enforce, even in states that have adopted a "neutral principles" approach. Application of § 57-9(A) is unconstitutional because it nullifies the

governing papers and policy, and their concomitant property and trust principles, of these hierarchical organizations. A statute that singles out the legally binding organizational documents and property arrangements of churches whose property is titled in trustees, and permits a court to invalidate those provisions on grounds not applicable to other types of religious or secular organizations or entities, cannot pass Constitutional muster. In conducting the inquiry contemplated by § 57-9(A), the Court, of necessity, has entered the “religious thicket,” rendering the statute unconstitutional.

Application of § 57-9(A) to the additional Diocesan *amici* would have a severe detrimental impact on their freedom to practice religion according to their own doctrines, polity and rules, in violation of the First and Fourteenth Amendments to the Constitution of the United States and Article I, Sections 11 and 16, of the Constitution of Virginia. For all of the reasons stated in the *amici curiae* brief filed by the General Council on Finance and Administration of the United Methodist Church, *et al.*, and the reasons stated in the Supplemental Constitutional Brief of the Diocese of Virginia and The Episcopal Church’s Supplemental Brief on Constitutional Issues, the additional Diocesan *amici* respectfully submit that the Court should declare Virginia Code § 57-9(A) to be unconstitutional.

### **Conclusion**

The additional Diocesan *amici* have substantial interests in the outcome of these cases, and accordingly, they respectfully ask leave of Court to join in the *amici curiae* brief filed by the General Council on Finance and Administration of the United Methodist Church, *et al.* Additional Diocesan *amici* further note respectfully that they agree with and support the arguments presented in the Supplemental Constitutional Brief of the Diocese of Virginia Pursuant to April

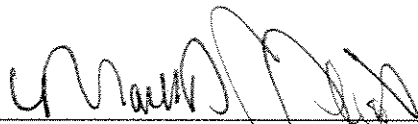
3, 2008, Order and in The Episcopal Church's Supplemental Brief on Constitutional Issues. The additional Diocesan *amici* do not wish to be heard.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

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Episcopal Diocese of Southern Virginia

**VIRGINIA:**

**IN THE CIRCUIT COURT OF FAIRFAX COUNTY**

|  |   |                   |                   |
|--|---|-------------------|-------------------|
| <b>In re:</b>                                    | ) | <b>Case Nos.:</b> | CL 2007-248724,   |
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|  | ) |                   | CL 2007-5686,     |
|  | ) |                   | CL 2007-5902,     |
|  | ) |                   | CL 2007-5903, and |
|  | ) |                   | CL 2007-11514     |

**MOTION OF THE DIOCESE OF SOUTHERN VIRGINIA AND SOUTHWESTERN VIRGINIA FOR LEAVE TO JOIN AMICI BRIEF**

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This acts as a coversheet reference pleading to the complete Motion Of The Diocese of Southern Virginia and Southwestern Virginia For Leave To Join *Amici* Brief in CL 2007-

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ATTORNEYS AT LAW  
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FILE NO.

248724 (the omnibus case file) and this corresponding reference pleading apply to the following cases:

CL 2007-248724,  
CL 2006-15792,  
CL 2006-15793,  
CL 2007-556,  
CL 2007-1235,  
CL 2007-1236,  
CL 2007-1237,  
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CL 2007-5685,  
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CL 2007-5902,  
CL 2007-5903, and  
CL 2007-11514

For the complete Motion of the Diocese of Southern Virginia and Southwestern Virginia For Leave To Join Amici Brief filed on behalf of the Diocese of Southern Virginia and Southwestern Virginia, please see the omnibus case file, CL 2007 – 248724.

Respectfully submitted,

  
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