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February 28, 2012

BY ELECTRONIC MAIL VIA GREGORY J. SAGSTETTER, LAW CLERK

The Honorable Randy I. Bellows
Judges Chambers
Fairfax County Circuit Court
4110 Chain Bridge Road
Fairfax, Virginia 22030

Re: In Re: Multi-Circuit Episcopal Church Property Litigation (CL-2007-0248724) (omnibus case number)

Dear Judge Bellows:

This responds to the email from your law clerk yesterday requesting the parties' positions on various matters.

The position of the Diocese of Virginia is that an Episcopal church cannot unilaterally sever its ties with The Episcopal Church and the Diocese or affiliate with another entity, and therefore that there are no dates of any such severances or affiliations, formal or otherwise. Moreover, even if such severances or affiliations were possible, it is the position of the Diocese that the dates of the Section 57-9 votes were not dates of formal severing of ties, and that formal severing of ties was not accomplished through any resolution or other formal action, including the Section 57-9 votes.

It is our position, however, that the Diocesan Executive Board's January 22, 2007 resolutions declaring that the properties had been abandoned constituted a formal severance of the ties between the departing congregations – not the Episcopal churches to which they belonged – and the Diocese.

We have no position on the Court's second question, *i.e.*, the dates when the congregations formally affiliated with other entities.

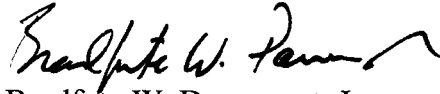
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As stated in your law clerk's email, we look forward to argument regarding these matters tomorrow.

Respectfully submitted,



Bradfute W. Davenport, Jr.

cc: All Counsel of Record (via electronic mail)