

**THE DIOCESE OF VIRGINIA HEARING PANEL
IN THE TITLE IV MATTER OF
THE REVEREND DR. B. CAYCE RAMEY, RESPONDENT**

**CHURCH ATTORNEY'S RENEWED MOTION TO NOT ALLOW
RESPONDENT TO INTRODUCE ANY MATTER INTO EVIDENCE**

In its May 26, 2026 Scheduling Order, the Hearing Panel ruled that the Church Attorney's motion to not allow Respondent to enter any matter into evidence was overtaken by Respondent's non-participation. "The PANEL as a result currently neither grants nor denies this motion."

The Church Attorney submits that the time has now come to grant his motion. The reason is that under Canon IV.13.9 the Church Attorney and the Respondent were required to provide to each other and to the Hearing Panel witness and exhibit disclosures "at least 15 days before the hearing." That time expired June 9, 2026. The Church Attorney complied. The Respondent did not.

The language of Canon IV.13.9 is mandatory, not permissive. It says the parties "shall" provide the disclosures, not that they "may" provide them. Compare that to, e.g., the language of Canon IV.7.1 and Canon IV. 7.3, which say that a Bishop "may" issue a Pastoral Direction or place a Member of the Clergy on Administrative Leave. General Convention clearly knows the difference between "may" and "shall."

There must be a consequence for the Respondent's failure to timely make the Canon IV.13.9 disclosures. The only consequence that fits is that the Respondent may not call witnesses (including himself) or introduce exhibits at the hearing. The Church Attorney accordingly requests that the Hearing Panel so rule.

Date: June 11, 2026

/s/ Bradfute W. Davenport, Jr.

Bradfute W. Davenport, Jr.
Church Attorney Pro Haec Vici