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April 18, 2008

BY HAND

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 Church of Our Saviour at Oatlands' Opposition to Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions, 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 2006-15793);
3. *In re: Church of the Epiphany* (Circuit Court of Fairfax County; CL 2007-556);
4. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of the Epiphany, Herndon* (Circuit Court of Fairfax County; CL 2007-1235);

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Re: Multi-Circuit Church Property Litigation
(Case No. CL 2007-0248724)
April 18, 2008
Page 2 of 4

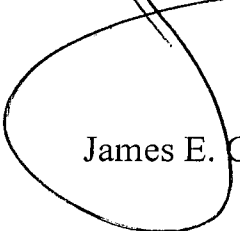
5. *The Protestant Episcopal Church in the Diocese of Virginia v. Truro Church* (Circuit Court of Fairfax County; CL 2007-1236);
6. *The Protestant Episcopal Church in the Diocese of Virginia v. Christ the Redeemer Church* (Circuit Court of Fairfax County; CL 2007-1237);
7. *The Protestant Episcopal 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. CL 73465) (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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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).

Best regards.

Very truly yours,



James E. Carr

TDL/tdl
enclosures

cc: Gordon A. Coffee, Esquire
Steffen N. Johnson, Esquire
George O. Peterson, Esquire
James A. Johnson, Esquire
Mary A. McReynolds, Atty At Law
Scott T. Ward, Esquire
E. Andrew Burcher, Esquire

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Page 4 of 4

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Bradfute W. Davenport, Jr. Esquire
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Joshua D. Heslinga, Esquire
Robert C. Dunn, Esquire
William E. Thro, Esquire

Courtesy copy to:

Seana C. Cranston, Law Clerk to the
Honorable Randy I. Bellows

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

IN RE: MULTI-CIRCUIT CHURCH
PROPERTY LITIGATION

CASE NUMBERS: CL 2007-248724,
CL 2006-15792,
CL 2006-15793,
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CL 2007-1236,
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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.

**CHURCH OF OUR SAVIOUR AT OATLANDS' OPPOSITION TO RENEWED
MOTION FOR LEAVE TO PROCEED WITH DISCOVERY AND SCHEDULING IN
THE DECLARATORY JUDGMENT ACTIONS**

COMES NOW the Defendant Church of Our Saviour at Oatlands and for its Opposition to the Protestant Episcopal Church in the United States of America ("ECUSA") and the Diocese of Virginia's ("Diocese") (collectively, the "ECUSA/Diocese") Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions, states as follows:

1. The scope of the discovery sought by the ECUSA/Diocese is overly broad and premature in advance of determination in the Section 57-9 proceedings.

2. The Church of Our Saviour at Oatlands will be prejudiced by the necessity of expending substantial attorneys' fees and costs in connection with the discovery and related proceedings ECUSA/Diocese wishes to pursue.

WHEREFORE, the Church of Our Saviour prays that the Motion to Lift Stay filed herein by the Diocese and ECUSA be denied and they take nothing thereby.

Respectfully submitted,

CHURCH OF OUR SAVIOUR AT OATLANDS
AND RELATED TRUSTEES

By: _____

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Leesburg, Virginia 20176
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703-726-0125 Facsimile

*Counsel for Church of Our Saviour at Oatlands and
Related Trustees*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of April, 2008 a copy of the foregoing Church of Our Saviour at Oatlands' Opposition to Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions was sent by electronic mail and first-class mail, postage prepaid, to:

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*With a courtesy copy by electronic mail and
hand-delivered to:*

Seana C. Cranston
Law Clerk to the Honorable Randy I. Bellows
Circuit Court of Fairfax County
Fairfax Judicial Center
4110 Chain Bridge Road
Fifth Floor Judges' Chambers
Fairfax, VA 22030-4009



JAMES E. CARR

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

IN RE: MULTI-CIRCUIT CHURCH
PROPERTY LITIGATION

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CL 2007-5685,
CL 2007-5686,
CL 2007-5902,
CL 2007-5903, and
CL 2007-11514.

**COVER FOR CHURCH OF OUR SAVIOUR AT OATLANDS' OPPOSITION TO
RENEWED MOTION FOR LEAVE TO PROCEED WITH DISCOVERY AND
SCHEDULING IN THE DECLARATORY JUDGMENT ACTIONS**

This acts as a one-page cover sheet reference pleading for the Church of Our Saviour at Oatlands' Opposition to Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions, which is being filed in Case No. CL 2007-0248724 (the Omnibus Case File), on April 18, 2008. The foregoing pleading and this corresponding one-page reference pleading applies to the Omnibus Case No. CL 2007-0248724 and the following cases:

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 2006-15793);
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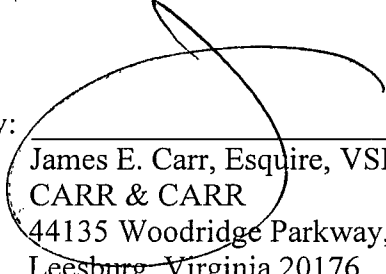
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21. *In re: Church of the Word, Gainesville* (Circuit Court of Fairfax County CL 2007-11514).

For the complete foregoing pleading, please see the Omnibus case file, CL 2007-0248724.

Respectfully submitted,

CHURCH OF OUR SAVIOUR AT OATLANDS
AND RELATED TRUSTEES

By:


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*Counsel for Church of Our Saviour at Oatlands and
Related Trustees*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of April, 2008, he caused all counsel to be served with copies of the foregoing Cover for Church of Our Saviour at Oatlands' Opposition to Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions, by electronic mail and first-class mail, postage prepaid, to:

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