#### 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

# RENEWED MOTION FOR LEAVE TO PROCEED WITH DISCOVERY AND SCHEDULING IN THE DECLARATORY JUDGMENT ACTIONS

Bradfute W. Davenport, Jr. (VSB # 12848)
George A. Somerville (VSB # 22419)

Joshua D. Heslinga (VSB # 73036)

Troutman Sanders LLP

Mary
1660
Suite

Post Office Box 1122 Richmond, Virginia 23218-1122

Telephone: (804) 697-1200 Facsimile: (804) 697-1339 Mary C. Zinsner (VSB # 31397)

Troutman Sanders LLP 1660 International Drive

Suite 600

McLean, Virginia 22102 Telephone: (703) 734-4334 Facsimile: (703) 734-4340

Counsel for The Protestant Episcopal Church in the Diocese of Virginia

Heather H. Anderson (VSB # 38093) Adam M. Chud (pro hac vice) Soyong Cho (VSB # 70896) Goodwin Procter 901 New York Avenue, N.W. Washington, D.C. 20001

Telephone: (202) 346-4000 Facsimile: (202) 346-4444

Counsel for the Episcopal Church

This acts as a coversheet reference pleading to the complete Diocese of Virginia's and the Episcopal Church's Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions, which was filed in CL 2007-248724 (the omnibus case file) on March 28, 2008. The Diocese and the Episcopal Church's Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions 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, 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

For the complete Renewed Motion for Leave to Proceed with Discovery and Scheduling in the Declaratory Judgment Actions filed on behalf of the Diocese and the Episcopal Church, please see the omnibus case file, CL 2007 – 248724.

## Respectfully submitted,

# THE PROTESTANT EPISCOPAL CHURCH IN THE DIOCESE OF VIRGINIA

By: Of Counsel

Bradfute W. Davenport, Jr. (VSB # 12848) George A. Somerville (VSB # 22419) Joshua D. Heslinga (VSB # 73036) Troutman Sanders LLP Post Office Box 1122 Richmond, Virginia 23218-1122

(804) 697-1200 fax: (804) 697-1339 Mary C. Zinsner (VSB # 31397) Troutman Sanders LLP

1660 International Drive

Suite 600

McLean, Virginia 22102 Telephone: (703) 734-4334 Facsimile: (703) 734-4340

THE EPISCOPAL CHURCH

By: Heaten H. anduson/ many

Heather H. Anderson (VSB # 38093) Adam M. Chud (pro hac vice) Soyong Cho (VSB # 70896) Goodwin Procter 901 New York Avenue, N.W. Washington, D.C. 20001

Telephone: (202) 346-4000 Facsimile: (202) 346-4444

### 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 a asterisk below), on this 28th day of March, 2008:

\* Gordon A. Coffee, Esquire (gcoffee@winston.com)

Gene C. Schaerr, Esquire (gschaerr@winston.com)

Steffen N. Johnson, Esquire (sjohnson@winston.com)

Andrew C. Nichols, Esquire (anichols@winston.com)

Winston & Strawn LLP

1700 K Street, N.W.

Washington, D.C. 20006

Counsel for Truro Church, Church of the Epiphany,

Church of the Apostles, The Church at The Falls – The Falls Church, and associated individuals

- \* George O. Peterson, Esquire (gpeterson@sandsanderson.com)
- J. Jonathan Schraub, Esquire (jjschraub@sandsanderson.com)

Sands Anderson Marks & Miller, P.C.

1497 Chain Bridge Road, Suite 202

McLean, Virginia 22101

Counsel for Truro Church and certain associated individuals

\* Mary A. McReynolds, Esquire (mamcreynoldspc@aol.com)

Mary A. McRevnolds, P.C.

1050 Connecticut Avenue, N.W., 10th Floor

Washington, D.C. 20036

Counsel for St. Margaret's Church, St. Paul's Church, Church of the Epiphany, Church of the Apostles, St. Stephen's Church, and associated individuals

\* E. Andrew Burcher, Esquire (eaburcher@pw.thelandlawyers.com)

Walsh, Colucci, Lubeley, Emrich & Walsh, P.C.

4310 Prince William Parkway, Suite 300

Prince William, Virginia 22192

Counsel for St. Margaret's Church, St. Paul's Church, and Church of the Word

\* James E. Carr, Esquire (NorthVaJim@aol.com)

Carr & Carr

44135 Woodridge Parkway, Suite 260

Leesburg, Virginia 20176

Counsel for the Church of Our Saviour at Oatlands and associated individuals

# \* R. Hunter Manson, Esquire (manson@kaballero.com)

PO Box 539

876 Main Street

Reedville, Virginia 22539

Counsel for St. Stephen's Church and associated individuals

\* Scott J. Ward, Esquire (sjw@gg-law.com)

Timothy R. Obitts (tro@gg-law.com)

Robert W. Malone (rwm@gg-law.com)

Gammon & Grange, P.C.

8280 Greensboro Drive

Seventh Floor

McLean, Virginia 22102

Counsel for The Church at The Falls – The Falls Church and certain associated individuals, Christ the Redeemer Church, and Potomac Falls Church

\* James A. Johnson, Esquire (jjohnson@semmes.com)

Paul N. Farquharson, Esquire (pfarquharson@semmes.com)

Scott H. Phillips, Esquire (sphillips@semmes.com)

Sarah W. Price, Esquire (sprice@semmes.com)

Semmes Bowen & Semmes, P.C.

250 West Pratt Street

Baltimore, Maryland 21201

Counsel for The Church at The Falls – The Falls Church and certain associated individuals

\* Edward H. Grove, III, Esquire (egrove@thebraultfirm.com)

Brault Palmer Grove White & Steinhilber LLP

10533 Main Street

P.O. Box 1010

Fairfax, VA, 22038-1010

Counsel for certain trustees of The Church at The Falls – The Falls Church (Episcopal)

\* Robert C. Dunn, Esquire (rdunn@robdunnlaw.com)

LAW OFFICE OF ROBERT C. DUNN

707 Prince Street

P. O. Box 117

Alexandria, Virginia 22313-0117

Counsel for Marjorie Bell, trustee of Church of the Epiphany (Episcopal)

\* William E. Thro, Esquire (WThro@oag.state.va.us)
Stephen R. McCullough, Esquire (SMccullough@oag.state.va.us)
Office of the Attorney General
900 East Main Street
Richmond, Virginia 23219

Counsel for the Commonwealth of Virginia ex. rel. Robert F. McDonnell, in his official capacity as Attorney General

m 7 ·· m -