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<b>From:</b>	<b>Date:</b>	<b>Client/Matter No.</b>
Thomas S. Leatherbury	February 8, 2011	COR198/45000
<b>Regarding:</b>	<b>Number of Pages</b>	<b>Hard Copy Follows</b>
Cause No. 141-237105-09; <i>The Episcopal Church, et al. v. Franklin Salazar, et al.</i> ; In the 141 <sup>st</sup> District Court of Tarrant County, Texas	(including cover page) 36	

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Message:

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February 8, 2011

## *Via Facsimile*

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Re: *The Episcopal Diocese of Fort Worth, et al. v. Franklin Salazar, et al.*;  
Cause No. 141-237105-09; in the 141st District Court of Tarrant County, Texas

Dear Counsel:

As I mentioned this morning, I enclose:

1. Local Episcopal Parties' First Requests for Production of Documents; and
2. Local Episcopal Parties' First Set of Interrogatories;

Very truly yours,



Thomas S. Leatherbury

Enclosures

**Vinson & Elkins LLP Attorneys at Law**  
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V&E

February 8, 2011 Page 2

cc: Kathleen Wells, Esq. *(via facsimile)*  
Jonathan D.F. Nelson, Esq. *(via facsimile)*

US 755188v.1

## CAUSE NO. 141-237105-09

THE EPISCOPAL CHURCH, et al.,

)

IN THE DISTRICT COURT OF

VS.

)

TARRANT COUNTY, TEXAS

FRANKLIN SALAZAR, et al.<sup>1</sup>

)

141<sup>ST</sup> DISTRICT COURT

**LOCAL EPISCOPAL PARTIES' FIRST REQUESTS  
FOR PRODUCTION OF DOCUMENTS**

TO: All Defendants, as listed in Defendants' Motion for Partial Summary Judgment,<sup>2</sup> by and through their attorneys of record J. Shelby Sharpe, Scott A. Brister, and R. David Weaver.

Pursuant to Texas Rule of Civil Procedure 196.1, the Local Episcopal Parties request that Defendants, as defined below, timely respond to this Request for Production and produce the requested documents for inspection and copying at the offices of the Local Episcopal Parties' counsel, 2001 Ross Ave., Suite 3700, Dallas, TX 75201, within 30 days of the date of service of this request.

**DEFINITIONS AND INSTRUCTIONS**

1. "Documents" means any and all written, typed or printed matters, and all magnetic, electronic, or other records or documentation of any kind of description, including emails, as described in TEX. R. CIV. P. 192.3. Please produce all electronic or magnetic data or media in electronic or magnetic form pursuant to TEX. R. CIV. P. 192.4 on compact discs (CDs) or DVDs.

<sup>1</sup> The style has been shortened at the request of the Clerk's office. It does not imply that any parties are omitted or dropped from the case.

<sup>2</sup> Reference to the defendants who have identified themselves as "The Episcopal Diocese of Fort Worth" and "The Corporation of The Episcopal Diocese of Fort Worth" does not imply that Defendants have authority to control those entities or their assets or that these parties are a diocese and corporation, respectively, as contended. The Local Episcopal Parties have referred to these defendants in other filings as the Anglican Province of the Southern Cone's "Diocese of Fort Worth" and the Anglican Province of the Southern Cone's "Corporation of the Episcopal Diocese of Fort Worth," respectively. The Court has granted Plaintiff The Episcopal Church's Motion for Summary Judgment and the Local Episcopal Parties' Amended Motion for Partial Summary Judgment and has determined that the Episcopal Diocese of Fort Worth is a "constituent part of [The Episcopal] Church" and "consists of those individuals remaining loyal to the hierarchical church body." As a result, the Local Episcopal Parties, as "individuals remaining loyal to the hierarchical church body," are "the individuals who remain entitled to the use and control of the church property" and are entitled to "control of the Diocesan Corporation."

2. "You" or "your" refers to the individual or entity to which this discovery request is addressed.
3. "Local Episcopal Parties" means the Rt. Rev. C. Wallis Ohl, Robert Hicks, Floyd McKneely, Shannon Shipp, David Skelton, Whit Smith, Margaret Mienli, Anne T. Bass, Walt Cabe, the Rev. Christopher Jambor, the Rev. Frederick Barber, the Rev. David Madison, Robert M. Bass, the Rev. James Hazel, Cherie Shipp, the Rev. John Stanley, Dr. Tracc Worrell, the Rt. Rev. Edwin F. Gulick, Jr., and Kathleen Wells.
4. "Diocese" means the Episcopal Diocese of Fort Worth formed effective January 1, 1983 as a diocese of The Episcopal Church.
5. "Corporation" means the Corporation of the Episcopal Diocese of Fort Worth, incorporated in 1983.
6. "Church" means Plaintiff The Episcopal Church.
7. "Endowment Fund" means the Fund for the Endowment of the Episcopate, an institution of the Diocese that holds and manages certain property of the Diocese and was authorized under article 16 of the Diocesan Constitution.
8. "Defendants" means the parties that filed "Defendants' Motion for Summary Judgment" on December 23, 2010, as those parties listed themselves therein.<sup>3</sup>
9. "Individual Defendants" means The Rt. Rev. Jack Leo Iker, Judy Mayo, Franklin Salazar, Julia Smead, The Rev. Christopher Cantrell, The Rev. Timothy Perkins, The Rev. Ryan Reed, The Rev. Thomas Hightower, Jo Ann Patton, Walter Virden, III, Rod Barber, and Chad Bates.
10. "Iker" means The Rt. Rev. Jack Leo Iker.
11. "Defendant Diocese" means the party represented by J. Shelby Sharpe and Scott A. Brister that calls itself "The Episcopal Diocese of Fort Worth."<sup>4</sup>
12. "Defendant Corporation" means the party represented by J. Shelby Sharpe and Scott A. Brister that calls itself "The Corporation for the Episcopal Diocese of Fort Worth."<sup>5</sup>
13. "Intervening Congregations" means the parties represented by R. David Weaver who filed their First Amended Original Plea in Intervention on November 12, 2010 and the party calling itself "All Saints' Episcopal Church" and represented by R. David Weaver.
14. "Relevant Entities" means the following entities:

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<sup>3</sup> See footnote 2 above.

<sup>4</sup> See footnote 2 above.

<sup>5</sup> See footnote 2 above.

- a. the Diocese;
- b. the Corporation;
- c. the Endowment Fund;
- d. the Parishes and Missions of the Diocese;
- e. the Defendant Diocese;
- f. the Defendant Corporation;
- g. the Intervening Congregations;
- h. each Fund, Trust, Foundation, or other entity listed on Exhibits A1 and B1 or identified in response to Interrogatory 3; and
- i. any other diocesan institution or entity for which Iker claims to have served as Bishop.

15. The time period covered by these requests is **January 1, 2006** to the present, unless specified otherwise in a particular request.

### DOCUMENTS TO BE PRODUCED

Please produce all documents in the following categories or which reflect transactions or events described below:

#### **I. Assets and Liabilities**

1. All financial documents, records, and/or communications that identify or relate to the assets and/or liabilities of any of the Relevant Entities since January 1, 2006. This request includes, but is not limited to, inventories, annual reports, financial statements, general ledgers, audit reports, and similar financial documents for each entity.

#### **RESPONSE:**

2. Statements from each depository or investment account listed on Exhibits A1 or B1 or other such accounts in which funds or other assets are held in the name of or for the use and benefit of any of the Relevant Entities between January 1, 2006 and the present. Include in your response documents to reflect the balance in or value of each such account (1) on November 14, 2008 and (2) within 45 days of your response.

#### **RESPONSE:**

3. Inventories, deeds, leases, rental agreements, mineral leases, division orders, easements, deeds of trust, notices of tax liens, agreements, appraisal reports, valuation notices, promissory notes, judgments, settlement agreements, and all other similar or related documents that reflect or relate to the location, condition, value, and/or type of legal or equitable, direct or indirect interest in real property owned, held, or used by each of the Relevant Entities since January 1, 2006.

#### **RESPONSE:**

4. Inventories, agreements, bills of sale, trust instruments, wills, articles or certificates of incorporation or association, bylaws, documents creating foundations, and other related or similar documents that reflect the assets and terms of any entity (including funds, trusts, foundations, and accounts) that holds title or control of any real or personal property owned, held, or used by each of the Relevant Entities since January 1, 2006.

**RESPONSE:**

5. Notes, contracts, agreements, leases, judgments, notices of tax liens, pleadings, judgments, and other similar and related documents that reflect the amount and basis for any liability of each of the Relevant Entities since January 1, 2006.

**RESPONSE:**

6. Notes, leases, security agreements, vendors' liens, pledges, deeds of trust, and other documents that reflect money or property owed to each of the Relevant Entities since January 1, 2006:

**RESPONSE:**

7. Documents related to payments or other transfers of property made purportedly by any of the Relevant Entities to or for the benefit of any of the Individual Defendants or any other insider of the Defendant Diocese or Defendant Corporation. For the purpose of this request, the term "insider" includes, but is not limited to, corporations, associations, or other entities of which an individual defendant or other official of the Defendant Diocese or Defendant Corporation is an officer, director, or person in control (e.g., Jude Funding, Inc.).

**RESPONSE:**

8. Documents relating to guaranties or indemnification of any person or entity by the any of the Relevant Entities.

**RESPONSE:**

9. Fee agreements, checks, invoices, and other documents that reflect the payments made to each attorney and/or law firm with which you contend that you or any of the Relevant Entities have or have had during the requested period an attorney-client relationship regarding the subject matter of this litigation, including, but not limited to, the attorneys whose fees you seek to

recover from the Episcopal Parties in this litigation. Your response should also include documents that reflect any amount owed to such attorneys.

**RESPONSE:**

10. Documents that reflect the name of each attorney with whom the Defendants, respectively, have or have had an attorney-client relationship regarding the subject matter of this litigation, including each attorney with whom the Defendants, respectively, participated in what the Defendants claim is privileged communication regarding the subject matter of this litigation during the requested period.

**RESPONSE:**

11. Tax returns filed with governmental authorities to reflect unrelated business income, ad valorem taxes, or other tax liability of any of the Relevant Entities during the relevant period.

**RESPONSE:**

12. Communications with the Internal Revenue Service and other governmental entities regarding liens on property arising out of taxes allegedly unpaid by any of the Relevant Entities during the relevant period.

**RESPONSE:**

13. All applications and statements from each account in a depository or investment institution that has been open during the relevant period, and in which funds, stocks, or other assets of any of the Relevant Entities are presently held or have been deposited or withdrawn. Include in your response documents sufficient to track the movement of those funds, stocks, or other assets between or among accounts.

**RESPONSE:**

14. The annual parochial reports of each parish or mission of each diocese for which Iker claims to have served as Bishop during the relevant period.

**RESPONSE:**

15. All minutes and meeting packets of the meetings of the following committees and entities of each diocese for which Iker claims to have served as Bishop since January 1, 2006:

- a. Standing Committee,



- b. Board of the Corporation,
- c. Board of the Endowment Fund,
- d. Finance Committee,
- e. Executive Council.

**RESPONSE:**

16. Journals from the annual meetings and any special meetings of the Convention of the Diocese between January 1, 2007 and February 7, 2009.

**RESPONSE:**

17. Journals from the annual meetings and any special meetings after November 15, 2008 of the Convention of the Diocese or the Defendant Diocese.

**RESPONSE:**

18. Insurance policies covering real and personal property that any of the Relevant Entities have had in their possession since November 15, 2008. Include in your response notices of claims and supporting documents for each claim made on such policies during the relevant period.

**RESPONSE:**

19. Pleadings, judgments, if any, and similar documents reflecting the court or agency, cause number, and status of all lawsuits and administrative proceedings to which any of the Relevant Entities is named as a party during the relevant period.

**RESPONSE:****II. After November 14, 2008**

20. Documents and communications reflecting the name and contact information for each person who after November 15, 2008 has been the custodian of or purported to exercise authority over property in which any of the Relevant Entities had an interest as of November 14, 2008.

**RESPONSE:**

21. Repair slips, agreements, warranties, invoices, architectural plans, inspection reports, and similar documents that reflect maintenance performed since November 14, 2008 or maintenance

reasonably needed to preserve and protect the property of any of the Relevant Entities while the property has been in the possession of the Defendants.

**RESPONSE:**

22. Documents and communications reflecting amounts and sources of income, from other than current charitable contributions or donations, received by the Defendants from third parties on behalf of any of the Relevant Entities after November 14, 2008, including unrelated business income (such as from events at Camp Crucis), dividends, distributions, bonuses, royalties, rents, and fees for services.

**RESPONSE:**

23. Executory contracts, including rental agreements and unexpired leases, to which any of the Relevant Entities are or were purported parties after November 14, 2008.

**RESPONSE:**

24. Notes, security agreements, modification agreements, vendors' liens, deeds of trust, and other documents that reflect secured debts purportedly incurred after November 14, 2008 by any of the Relevant Entities.

**RESPONSE:**

25. Notes, agreements, indemnity agreements, guaranties, and other documents that reflect unsecured debts purportedly incurred after November 14, 2008 by any of the Relevant Entities.

**RESPONSE:**

26. Notes, agreements, contracts, indemnity agreements, guaranty agreements, and similar documents that reflect the identity of each co-debtor on each debt purportedly incurred after November 14, 2008 by any of the Relevant Entities.

**RESPONSE:**

27. Notes, agreements, contracts, indemnity agreements, guaranty agreements, and similar documents that reflect the identity of each of the purported creditors of any of the Relevant Entities on each debt or other obligation after November 14, 2008.

**RESPONSE:**

28. Leases, rental agreements, and other documents that reflect the identity of the persons residing since November 14, 2008 in property, including rectories, owned by the Corporation, as referred to in the affidavit of Charles A. Hough III dated January 27, 2011. Your response should include documents reflecting the dates, rent or other consideration, and other terms of such possession and use of the property.

**RESPONSE:**

29. Newsletters, letters, or any other documents that reflect the use after November 14, 2008 by the Defendants of the name "The Episcopal Diocese of Fort Worth" and the seal of the Diocese (which has been in use by the Diocese since 1983).

**RESPONSE:**

30. Liens, including tax liens and cross-collateralization provisions, or other encumbrances purportedly imposed on any real or personal property of any of the Relevant Entities since November 14, 2008.

**RESPONSE:**

31. Agreements, notes, title policies, and other documents reflecting the terms and conditions of all transactions, including loans, purportedly entered into by the Corporation with Jude Funding, Inc.

**RESPONSE:**

32. Checks, agreements, and other documents that reflect the disposition and payments made from the proceeds of the 2010 loan from Jude Funding, Inc. purportedly to the Corporation.

**RESPONSE:**

33. Deeds, bills of sale, and similar documents that identify the property and reflect the purported sale, lease, gift, pledge as collateral, or other transfer, alienation, or encumbrance of personal property, including livestock, musical instruments, chalices or other sacramental objects, artwork, furniture, furnishings, and other personal property, by any of the Relevant Entities since November 14, 2008.

**RESPONSE:**

34. Deeds, leases, and other documents that identify interests in the real property of any of the Relevant Entities that purportedly has been sold, leased, pledged as collateral, or otherwise transferred, alienated, encumbered, or altered by Defendants since November 14, 2008, whether such property has been in possession of the Defendants or not.

**RESPONSE:**

35. Agreements, minutes, and other documents that reflect improvements to real property and personal property that has been destroyed or transferred by the Defendants since November 14, 2008.

**RESPONSE:**

36. Documents that reflect the name and term of office of each person who has served on and after November 14, 2008 in any diocese in which Iker has served as bishop. Your response should include, but not be limited to, documents identifying any persons serving in the following positions:

- a. Member of the Standing Committee of the Diocese;
- b. Trustee of the Corporation;
- c. Trustee of the Endowment Fund;
- d. Member of the Finance Committee;
- e. Treasurer or assistant chancellor;
- f. Chancellor or assistant chancellor;
- g. Trustee or other official named to control each trust, foundation or other entity created or funded for the use and benefit of the Diocese;
- h. Auditor;
- i. Accountant;
- j. Bookkeeper;
- k. Delegate to Diocesan Convention.

**RESPONSE:**

37. Documents that reflect the name and term of office of each person who has served on and after November 14, 2008 in any Parish or Mission under the episcopal authority of Iker, in any of the following positions:

- a. Member of the Vestry;
- b. Senior Warden;
- c. Junior Warden;
- d. Member of the Finance Committee;
- e. Treasurer or assistant chancellor;

- f. Chancellor or assistant chancellor;
- g. Trustee or other official named to control each trust, foundation or other entity created or funded for the use and benefit of the Parish or Mission;
- h. Rector, vicar, or priest in charge;
- i. Auditor;
- j. Accountants;
- k. Bookkeeper;
- l. Delegate to Diocesan Convention.

**RESPONSE:**

38. Any and all documents identified in, consulted, or reviewed during the preparation of any of your Interrogatory responses.

**RESPONSE:**


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 Facsimile: 214-999-7792

**Attorneys for Local Episcopal Parties**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served this 8th day of February, 2011, by hand delivery or facsimile, upon:

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CAUSE NO. 141-237105-09

THE EPISCOPAL CHURCH, et al.,	)	IN THE DISTRICT COURT OF
	)	
VS.	)	TARRANT COUNTY, TEXAS
	)	
	)	141 <sup>ST</sup> DISTRICT COURT
FRANKLIN SALAZAR, et al. <sup>1</sup>	)	

**LOCAL EPISCOPAL PARTIES' FIRST SET OF INTERROGATORIES**

TO: Defendants, as listed in Defendants' Motion for Partial Summary Judgment,<sup>2</sup> by and through their attorneys of record J. Shelby Sharpe, Scott A. Brister, and R. David Weaver.

Pursuant to TEX. R. CIV. P. 197.1 and 197.2, the Local Episcopal Parties request that Defendants, as defined below, timely serve verified answers to the following written interrogatories within 30 days of the date of service of this request.

**DEFINITIONS AND INSTRUCTIONS**

As used herein:

1. "You" or "your" refers to the individual or entity to whom or which this discovery request is addressed.
2. "Local Episcopal Parties" means the Rt. Rev. C. Wallis Ohl, Robert Hicks, Floyd McKneely, Shannon Shipp, David Skelton, Whit Smith, Margaret Mientli, Anne T. Bass, Walt Cabe, the Rev. Christopher Jambor, the Rev. Frederick Barber, the Rev. David Madison, Robert M. Bass, the Rev. James Hazel, Cherie Shipp, the Rev. John Stanley, Dr. Trace Worrell, the Rt. Rev. Edwin F. Gulick, Jr., and Kathleen Wells.

<sup>1</sup> The style is being shortened at the request of the Clerk's office. It does not imply that any parties are omitted or dropped from the case.

<sup>2</sup> Reference to the defendants who have identified themselves as "The Episcopal Diocese of Fort Worth" and "The Corporation of The Episcopal Diocese of Fort Worth" does not imply that Defendants have authority to control those entities or their assets or that these parties are a diocese and corporation, respectively, as contended. The Local Episcopal Parties have referred to these defendants in other filings as the Anglican Province of the Southern Cone's "Diocese of Fort Worth" and the Anglican Province of the Southern Cone's "Corporation of the Episcopal Diocese of Fort Worth," respectively. The Court has granted Plaintiff The Episcopal Church's Motion for Summary Judgment and the Local Episcopal Parties' Amended Motion for Partial Summary Judgment and has determined that the Episcopal Diocese of Fort Worth is a "constituent part of [The Episcopal] Church" and "consists of those individuals remaining loyal to the hierarchical church body." As a result, the Local Episcopal Parties, as "individuals remaining loyal to the hierarchical church body," are "the individuals who remain entitled to the use and control of the church property" and are entitled to "control of the Diocesan Corporation."

3. "Defendants" means the parties that filed "Defendants' Motion for Summary Judgment" on December 23, 2010, as those parties listed themselves therein.<sup>3</sup>
4. "Corporation" means the Corporation of the Episcopal Diocese of Fort Worth, incorporated in 1983.
5. "Diocese" means the Episcopal Diocese of Fort Worth formed in 1982 as a diocese of The Episcopal Church.
6. "Iker" means The Rt. Rev. Jack Leo Iker.
7. "Endowment Fund" means the Fund for the Endowment of the Episcopate, an institution of the Diocese that holds and manages certain property of the Diocese and was authorized under article 16 of the Diocesan Constitution.
8. Pursuant to TEX. R. CIV. P. 197.1 and 197.2, please provide separate verified answers for each party to whom these interrogatories are directed.
9. The time period covered by these Interrogatories is **January 1, 2006** to the present, unless specified otherwise in a particular Interrogatory.

### INTERROGATORIES

1. Does **Exhibit A2** accurately state the legal description of each and every parcel of real property in which the Diocese or any of its institutions, including but not limited to the Corporation, the Endowment Fund, any Parish or Mission of the Diocese, and any schools, currently has or had as of November 15, 2008 a legal or equitable interest of any type (e.g., as owner or beneficiary)? If not, please provide a correct description of any properties inaccurately described, and for any property not included in **Exhibit A2**, please state the legal and common descriptions and location of the property; the size of the property in acres; a description of every improvement on the property; the name of the person or entity having the interest in the property; and whether any part of the property is within the corporate limits of a town and, if so, the name of the town.

#### **RESPONSE:**

2. For each property listed on **Exhibit A2** or described in response to Interrogatory 1, please provide the name and title of each person purporting to act on behalf of any of Defendants who has exercised control and use of the property after November 15, 2008; a description of any and all changes in disposition, condition, ownership, or control of the property after November 15, 2008 (including any sale, lease, other transfer, changed use, encumbrance, pledge of the property as collateral, increase or decrease in fair market value by more than 10%, or destruction) and the name of any person who authorized or dissented from each such action; and, for any interest acquired after November 14, 2008, the date and purchase price of the property or interest.

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<sup>3</sup> See footnote 2 above.



**RESPONSE:**

3. Do Exhibits A1 and B1 accurately state the name of each depository or investment account, foundation, fund, trust, or other entity in which the Diocese or any of its institutions, including but not limited to the Corporation, the Endowment Fund, any Parish or Mission of the Diocese, and any schools, currently has or had as of November 15, 2008 a legal or equitable interest of any type (e.g., as owner or beneficiary)? If not, please provide the correct names of any such depository or investment account, foundation, fund, trust, or other entity that is incorrectly named in Exhibits A1 or B1, and, for any depository or investment account, foundation, fund, trust, or other entity that is not listed in Exhibits A1 or B1, please state the correct name of each depository or investment account, foundation, fund, trust, or other entity in which an interest exists; the nature of the interest held by the Diocese or any of its institutions, (including, but not limited to, the Corporation, the Endowment Fund, any Parish or Mission of the Diocese, and any schools) in the depository or investment account, foundation, fund, trust, or other entity; and the date on which the interest was acquired.

**RESPONSE:**

4. For each depository or investment account, foundation, fund, trust, or other entity listed in Exhibits A1 or B1 or identified in response to Interrogatory 3, please provide the name and title of any person purporting to act on behalf of any of Defendants who has exercised control and/or used the money or property after November 15, 2008; a description of the money or property held by or in the depository or investment account, foundation, fund, trust, or other entity; and a description of each payment of money or sale, lease, other transfer, changed use, encumbrance, pledge of the property as collateral, increase or decrease in fair market value by more than 10%, or destruction of property from the depository or investment account, foundation, fund, trust, or other entity since November 15, 2008, including the name of any person who authorized or dissented from the actions described.

**RESPONSE:**

5. Please fully describe each item of personal property having a fair market value of more than \$500 in which the Diocese or any of its institutions (including but not limited to the Corporation, the Endowment Fund, any Parish or Mission of the Diocese, and any schools) has or has had a legal or equitable interest of any type (e.g., as owner or beneficiary) since November 15, 2008, including the name and title of each person purporting to act on behalf of any of Defendants who has exercised authority over the property after November 15, 2008 and a description of any change in disposition or condition of the item (including any sale, lease, or other transfer, changed use, pledge of the item as collateral, increase or decrease in fair market value by more than 10%, or destruction) after November 15, 2008, as well as the name of any person who authorized or dissented from each such action.

**RESPONSE:**

6. Please state the name, title, and term of office of each person who you claim has served on or after November 15, 2008 as a member of the Standing Committee of the Diocese, Trustee of the Corporation, Trustee of the Endowment Fund, member of the Finance Committee; treasurer; Chancellor or assistant chancellor; or Trustee or other official named to control any trust, foundation or other entity created or funded for the use and benefit of the Diocese.

**RESPONSE:**

7. Please state the name, title, and term of office of each person who you claim has served on or after November 15, 2008 in any Parish or Mission under the episcopal authority of Jack Leo Iker as a member of the Vestry; Senior Warden; Junior Warden; member of the Finance Committee; Treasurer; rector, vicar, or priest in charge; Chancellor or assistant chancellor; or Trustee or other official named to control any trust, foundation or other entity created or funded for the use and benefit of the Parish or Mission.

**RESPONSE:**

8. Please state the name of each attorney with whom any of the Defendants have or have had an attorney client relationship regarding the subject matter of this litigation, and for each attorney, state the Defendant(s) represented by the attorney; the person or entity responsible for paying the attorney's fees; the amount of attorney's fees paid to the attorney through the present; the source of the funds used to pay any fees to the attorney; and the amount of attorney's fees currently owed to the attorney.

**RESPONSE:**

9. Please fully describe the compensation paid in 2008, 2009, 2010, and 2011 to Iker and any other Defendant from any money or property held by or on behalf of the Diocese, the Corporation, the Endowment Fund, any Parish or Mission of the Diocese, any school, or any other Diocesan institution, including, for each person to whom compensation was paid, the types of compensation paid each year (e.g., salary, bonus, living expenses, property, etc.); the amount of each type of compensation paid each year (in dollars or estimated market value); the source of any funds paid in compensation; and any compensation presently owed.

**RESPONSE:**

10. Please provide a full description (including date of payment, amount, name of person(s) making the payment, name of recipient, amount of any outstanding balance, and due date) of any payment exceeding \$500 made by any of Defendants on behalf of the Diocese, Corporation, Endowment Fund, any Parish or Mission of the Diocese, any school, or any other Diocesan institution to any person or entity on or after November 15, 2008.

**RESPONSE:**

11. Please provide a full description (including the source, date received, receiving person, amount of money or type and value of property, location of money or property, and subsequent use or expenditure of money or property) of any money or property, excluding charitable donations, in excess of \$100 that the Diocese, Corporation, Endowment Fund, any Parish or Mission of the Diocese, any school, or any other Diocesan institution has received on or after November 15, 2008.

**RESPONSE:**



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Facsimile: 214-999-7792

**Attorneys for Local Episcopal Parties**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served this 8<sup>th</sup> day of February, 2011, by hand delivery or facsimile, upon:

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Sharpe Tillman & Melton  
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**EXHIBIT A1**  
**Diocesan Funds**

Fund for the Endowment of the Episcopate  
E.D. Farmer Fund – Fort Worth  
Anne S. and John S. Brown Trust  
Betty Ann Montgomery Farley Fund  
Reverend Efrain Huerta Fund benefiting Hispanic Ministries  
Memorial Scholarship Fund out of Common Trust (Growth Fund and Income Fund)  
St. Paul's Memorial Fund Fort Worth  
E.D. Farmer Foundation-Fort Worth  
Revolving Fund  
Scholarship Fund  
Joe and Jesse Crump Fund  
Reserve for Maintenance  
Catastrophe Fund-Wind and Hail  
Berger Reserve Funds  
Canterbury Ministry  
Eugenia Turner Fund  
St. Peter's Fund  
Moncrief Legal Fund  
ACN-Special Offerings  
Sabbatical Fund  
Reserve Church Plant  
Bishop's Mission Work  
Book of Remembrance  
World Mission  
Bishop's Golf Tournament  
Deacon Training  
F.C.W.  
United Thank Offering  
Christian Education  
Camp Crucis Alumni  
Safeguarding God's Children  
Risk Management Fees  
Diocesan Discretionary  
Memorial Scholarship Fund  
Malawi Shipping and Team Support  
Northern Mexico  
Centurions  
Youth Commission  
Interest Earned  
Conferences & Workshops  
Y.W.A.M. Missions Fund  
Endowment for the Episcopate  
Assisting Bishops Fund

La Gran Familia

**EXHIBIT A2**  
**Diocesan Real Property**

**PART 1: Properties in possession of Defendants/Southern Cone Parties:**

<b>For use of Diocese:</b>
Diocesan Center, Episcopal Diocese of Fort Worth 2900 Alameda, Fort Worth, Texas Episcopal Diocese Addition, Blk 1, Lot 1; Fort Worth, Tarrant County, Texas
Camp Crucis 2875 Camp Crucis Court Granbury, Texas Acres: 6.000 Abst: M OLDHAM - ABST 431, Hood County, Texas
Camp Crucis 2100 Loop 567 Granbury, Texas Acres: 5.320 Abst: R ALWAYS - ABST 4, Hood County, Texas
Camp Crucis 2875 Camp Crucis Court Granbury, Texas Acres: 154.383 Abst: R ALWAYS -ABST 4, Hood County, Texas
<b>For Use of Parishes and Missions:</b>
Christ the King Episcopal Church 3280 Lackland Rd. Fort Worth, Texas 76116 Z Boaz Country Place, Addn. 10 & 11R, Blk 16; Fort Worth, Tarrant County, Texas
Christ the King Episcopal Church 3300 Lackland Rd. Fort Worth, Texas 76116 Z Boaz Country Place Addition, Blk 17, Lot 1; Fort Worth, Tarrant County, Texas
Church of the Holy Apostles Episcopal 3900 Longvue Ave. Fort Worth, Texas Kin Acres, Blk 1, Lot 2R; Fort Worth, Tarrant County, Texas
Episcopal Church of St. Peter & St. Paul 3900 Morris Lane

Arlington, Texas 76016 Kelly, S D Subdivision, Blk Lot 13; Arlington, Tarrant County, Texas
Iglesia San Juan Apostol 3725 S. Adams St. Fort Worth, Texas 76110 Silver Lake Addition, Blk 50, Lot D, E and F and Blk 51, Lot B; Fort Worth, Tarrant County, Texas
St. Alban's Episcopal Church 911 S. Davis Dr. Arlington, Texas 76013 College Hills-Arlington, Blk D Lot; Arlington, Tarrant County, Texas
St. Alban's Episcopal Church 801 S. Davis Dr. Arlington, Texas Morgan Addition, Blk 1, Lot 8R; Arlington, Tarrant County, Texas
St. Andrew's Episcopal Church 917 Lamar St. Fort Worth, Texas 76102 Hirschfield Addition, Blk 4R, Lots 1 and 2; Fort Worth, Tarrant County, Texas
St. Andrew's Episcopal Church 914 Lamar St. Fort Worth, Texas 76102 Smith June Addition, Blk 2, Lot 2 & 2A; Fort Worth, Tarrant County, Texas
St. Andrew's Episcopal Church 6245 Locke Ave. Fort Worth, Texas Ridglea Addition, Blk 10, Lot 9 & 10; Fort Worth, Tarrant County, Texas
St. Anne's Episcopal Church 6055 Azle Ave. Fort Worth, Texas 76135 Brown Crawford Srvcy, A 157, Tr 1M; Fort Worth, Tarrant County, Texas
St. Barnabas Apostle Episcopal Church 8425 Parkwood Hill Blvd. Keller, Texas Saint Barbabas Addition - FW, Blk 1, Lot 1; Tarrant County, Texas
St. Gregory's Episcopal Church 1091 Country Club Dr.



<p>Mansfield, Texas 76063 Walnut Creek Valley Addition, Blk 20, Lot 9; Mansfield, Tarrant County, Texas</p>
<p>St. John's Episcopal Church 2401 College Ave. Fort Worth, Texas 76110 Page, R M Addition, Blk 4, Lots 1 &amp; 2; Fort Worth, Tarrant County, Texas</p>
<p>St. Laurence Episcopal Church 517 N. Kimball Ave. Grapevine, Texas 76092 Saint Laurence Episcopal Ch, Blk A Lot 1R; Grapevine, Tarrant County, Texas</p>
<p>St. Laurence Episcopal Church 549 N. Kimball Ave. Grapevine, Texas Tarrant Freeman, Samuel Survey, A 525, TR 5A04A; Grapevine, Tarrant County, Texas</p>
<p>St. Mark's Episcopal Church 2024 S. Collins St. Arlington, Texas 76010 Saint Mark's Addition, Blk A, Lot 1; Arlington, Tarrant County Texas</p>
<p>St. Michael Episcopal Church 3800 Popplewell St. Bldg Fort Worth, Texas 76118 Richland Hills Addition, Blk 17 Lot 16; Richland Hills, Tarrant County, Texas</p>
<p>St. Phillip the Apostle Episcopal Church 4900 New York Ave., Arlington, Texas Arlington M E &amp; P Railroad Addition, Blk Lot 1; Arlington, Tarrant County, Texas</p>
<p>St. Simon of Cyrene Episcopal Church 5500 Ramey Ave. Fort Worth, Texas 76112 Rosedale Park No. 2 Addition, Blk 29 Lts 20 Thru 22; Fort Worth, Tarrant County, Texas</p>
<p>St. Stephen's Episcopal Church 7452 Precinct Line Rd Hurst, Texas 76054 Saint Stephens Episcopal Church, Blk 1 Lot 1; Hurst, Tarrant County, Texas</p>
<p>St. Timothy's Episcopal Church 4201 Mitchell Blvd and 4220 Trueland Dr. Fort Worth, Texas Trueland Addition, Blk 2 Lot 3R; Fort Worth, Tarrant County, Texas</p>

<p>St. Timothy's Episcopal Church  3032 Glen Garden Dr.  Fort Worth, Texas  Trueland Addition, Blk 2 Wpt Lots 4 &amp; 5 &amp; Lt 6B; Fort Worth, Tarrant County, Texas</p>
<p>St. Timothy's Episcopal Church  3000 Glen Garden Dr. N.  Fort Worth, Texas  Glen Garden Addition, Blk 11 Lot A; Fort Worth, Tarrant County, Texas</p>
<p>St. Vincent's Cathedral and St. Vincent's School  1300 Forest Ridge Dr.  Bedford, Texas 76022  Saint Vincents, Blk 1 Lot 1; Bedford, Tarrant County, Texas</p>
<p>Our Lady of the Lake Episcopal Church  CR 1751  Laguna Park, Texas 76644  WILDWOOD, LOT 98 &amp; 99; Laguna Park, Bosque County, Texas</p>
<p>Our Lady of the Lake Episcopal Church  658 Hwy 22  Laguna Park, Texas 76644  WESTWAY, LOT 11,12,18 TO 24; Laguna Park, Bosque County, Texas</p>
<p>Episcopal Church of the Good Shepherd  1800 Good Shepherd Dr.  Brownwood, Texas 76801  H H HALL, SURVEY 49, ABSTRACT 400, ACRES 3.791; Brownwood, Brown  County, Texas</p>
<p>St. John Episcopal  700 Main Ave. or St.  Brownwood, Texas 76804  OUTLOT 268, ACRES 1.517, ALSO BLOCK 21, RANKIN ADDITION, Brownwood,  Brown County, Texas</p>
<p>Trinity Episcopal Church  815 Gilbert  Henrietta, Texas 76365  A-83 AMBROSE CRAIN; Henrietta, Clay County, Texas</p>
<p>Trinity Episcopal Church  815 E. Ikard  Henrietta, Texas 76365</p>

A-83 AMBROSE CRAIN; Henrietta, Clay County, Texas
St. Matthew's Episcopal Church 606 Wrights Ave. Comanche, Texas 76442 WRIGHTS, BLOCK 94 N/PT NWC, 150X141, (TR 1) 150X141, (TR 1); Comanche, Comanche County, Texas
St. Matthew's Episcopal Church 500 N. Austin Comanche, Texas 76442 WALCOTT, BLOCK 18 SW/4, (TR 6) (TR 6); Comanche, Comanche County, Texas
St. Paul's Episcopal Church 415 E. California St. Gainesville, Texas 76240 LINDSAY ADDN, BLOCK 11, LOT 3 - 4 & PT OF 5, 415 E CALIFORNIA; Gainesville, Cooke County, Texas
St. Paul's Episcopal Church 406 E. Elm Gainesville, Texas 76240 LINDSAY ADDN, BLOCK 11, LOT 8 PT OF, 406 E ELM 406 E ELM; Gainesville, Cooke County, Texas
St. Paul's Episcopal Church 411 E. California Gainesville, Texas 76240 LINDSAY ADDN, BLOCK 11, LOT 5 C 18, 411 E CALIFORNIA ; Gainesville, Cooke County, Texas
St. Paul's Episcopal Church 507 Lindsay St. Gainesville, Texas LINDSAY ADDN, BLOCK 31, LOT 5 & 6 PTS OF, 507 LINDSAY; Gainesville, Cooke County, Texas
St. Andrew's Episcopal Church 726 College Street Grand Prairie, Texas Dalworth Park, BLK 215, Lot 10; Grand Prairie, Dallas County, Texas
St. Andrew's Episcopal Church 730 College St. Grand Prairie, Texas Dalworth Park, Blk 215, Lot 13; Grand Prairie, Dallas County, Texas

<p>St. Andrew's Episcopal Church  734 College St.  Grand Prairie, Texas  Dalworth Park, Blk 215, Lot 12; Grand Prairie, Dallas County, Texas</p>
<p>St. Andrew's Episcopal Church  738 College St.  Grand Prairie, Texas  Dalworth Park, Blk 215, Lot 11; Grand Prairie, Dallas County, Texas</p>
<p>St. Andrew's Episcopal Church  802 College St.  Grand Prairie, Texas  Dalworth Park, Blk 214, Lot 20; Grand Prairie, Dallas County, Texas</p>
<p>St. Andrew's Episcopal Church  806 College St.  Grand Prairie, Texas  Dalworth Park, Blk 214, Lot 0019; Grand Prairie, Dallas County, Texas</p>
<p>St. Andrew's Episcopal Church  2717 Hyde Park Dr.  Grand Prairie, Texas  Parkview Phase 1B, Blk 5, Lot 1A; Grand Prairie, Dallas County, Texas</p>
<p>St. Andrew's Episcopal Church  721 Hill St.  Grand Prairie, Texas 75050  Dalworth Park, Blk 215 / REAPP-1985, Lot 6 7 8 &amp; 9; Grand Prairie, Dallas County,  Texas</p>
<p>St. Andrew's Episcopal Church  737 Hill Street  Grand Prairie, Texas  Dalworth Park, BLK 215, Lot 10; Grand Prairie, Dallas County, Texas</p>
<p>St. Andrew's Episcopal Church  801 Hill Street  Grand Prairie, Texas  Dalworth Park, BLK 214, Lots 1 and 2; Grand Prairie, Dallas County, Texas</p>
<p>St. Andrew's Episcopal Church  809 Hill Street  Grand Prairie, Texas  Dalworth Park, BLK 214, Lot 3 less 500 feet; Grand Prairie, Dallas County, Texas</p>

<p>St. Joseph Episcopal Church  4829 South Carrier Parkway  Grand Prairie, Texas  W. Chester Town Center 1, BLK 1, Lot 2 (2.893 ACRES); Grand Prairie, Dallas County,  Texas</p>
<p>Holy Trinity Episcopal Church  706 Seaman St.  Eastland, Texas 76448  15-16 BLK - G2 Nell Connellee; Eastland, Eastland County, Texas</p>
<p>Holy Trinity Episcopal Church  710 Seaman St.  Eastland, Texas 76448  2979 TE&amp;L RR ABST 528; Eastland, Eastland County, Texas</p>
<p>St. Alban's Episcopal Church  307 N. 5th St.W  Hubbard, Texas 76648  ONSTOTT BLK 12 LT 3 &amp; 4, Hubbard, Hill County, Texas</p>
<p>St. Mary's Episcopal Church  206 N. Abbott St. and 210 N. Abbot St.  Hillsboro, Texas 76645  CRAIG LT 38B CRAIG LOT 38, Hillsboro, Hill County, Texas</p>
<p>Episcopal Church of the Good Shepherd  3601 Fall Creek  Granbury, Texas 76049  Acres: 1.600 Abst: J MC COY - ABST 381, Hood County, Texas</p>
<p>Episcopal Church of the Good Shepherd  3600 Fall Creek  Granbury, Texas 76049  Acres: 0.054 Abst: J MC COY - ABST 381 TR J MC COY, Hood County, Texas</p>
<p>Episcopal Church of the Good Shepherd  5909 Walnut Creek  Granbury, Texas  Lot: 5 Blk: 1 Subd: WALNUT CREEK, Granbury, Hood County, Texas</p>
<p>Episcopal Church of the Good Shepherd  5911 Walnut Creek  Granbury, Texas  Lot: 6 Blk: 1 Subd: WALNUT CREEK, Granbury, Hood County, Texas</p>

<p>St. Thomas the Apostle Episcopal Church  227 W. Belknap  Jacksboro, Texas 76458  PT LTS 2,3,6,7 AND 8 BLK 34, Jacksboro, Jack County, Texas</p>
<p>Church of the Holy Comforter/Holy Comforter Episcopal Church  209 E. Wardville  Cleburne, Texas 76031  LOT 1,3, BLK 19. ORIGINAL CLEBURNE, Cleburne, Johnson County, Texas</p>
<p>Church of the Holy Comforter/Holy Comforter Episcopal Church  213 N. Robinson  Cleburne, Texas 76031  LOT 4, BLK 19, ORIGINAL CLEBURNE, Cleburne, Johnson County, Texas</p>
<p>Church of the Holy Comforter/Holy Comforter Episcopal Church  212 N. Anglin  Cleburne, Texas 76031  LOT 2, BLK 19, ORIGINAL CLEBURNE, Cleburne, Johnson County, Texas</p>
<p>St. Anthony of Padua Episcopal Church  129 Percifield Trail  Alvarado, Texas 76009  ABST 48, TR 4, WM BALCH, 126.5523.31397; Alvarado Johnson County, Texas</p>
<p>St. Patrick Episcopal Church  906 Hwy 81 N.  Bowie, Texas 76230  AB 784 BLK 2856 TE&amp;L CO, Bowie, Montague County, Texas</p>
<p>St. Luke's Episcopal Church  501 NW 25th St.  Mineral Wells, Texas 76067  NORTHWOOD LOT 18, Mineral Wells, Palo Pinto County, Texas</p>
<p>St. Luke's Episcopal Church  714 NW 5th Ave.  Mineral Wells, Texas 76067  WIGGINS BLOCK 32 LOTS E &amp; F, Mineral Wells, Palo Pinto County, Texas</p>
<p>St. Peter-by-the-Lake Episcopal Church  3128 Park Road 36, Possum Kingdom (Graford), Texas 76449  PK LAKE 3-1-94 AREA 1-36, CHURCH LOT L/H INT LAND, _____ County</p>
<p>All Saints' Episcopal Church</p>

<p>128 W. Oak  Weatherford, Texas  WEATHERFORD ORIGINAL TOWN LOT: S E PT 4 BLK: 008 ADDN:  WEATHERFORD ORIGINAL, Weatherford, Parker County, Texas</p>
<p>All Saints' Episcopal Church  133 S. Waco  Weatherford, Texas  WEATHERFORD ORIGINAL TOWN LOT: W 65 OF S 1/2 OF 4 BLK: 8 ADDN:  WEATHERFORD ORIGINAL, Weatherford, Parker County, Texas</p>
<p>St. Francis of Assisi Episcopal Church  117 Ranch House Rd.  Willow Park, Texas 76087  Acres: 3.330 Lot: 1 Blk: 36 Subd: EL CHICO PT OF 36 R REVISED, Willow Park,  Parker County, Texas</p>
<p>St. Francis of Assisi Episcopal Church  Ranch House Rd.  Willow Park, Texas 76087  Acres: 3.140 Lot: 1 Blk: 37 Subd: EL CHICO PT OF BLK 36 R REVISED, Willow Park,  Parker County, Texas</p>
<p>St. Andrew's Episcopal Church  7 Chaparral Lane  Breckenridge, Texas 76242  WALDON ESTATE BLOCK 6 LOT 5, Breckenridge, Stephens County, Texas</p>
<p>St. Andrew's Episcopal Church  200 N Easton  Breckenridge, Texas 76242  EAST BRECK BLOCK 13 LOT N/95 OF 4: 5 &amp; 6, Breckenridge, Stephens County,  Texas</p>
<p>All Saints Episcopal Church  2606 Southwest Parkway  Wichita Falls, Texas 76308  6 AC BLK 2 ABST. 295 - J, Wichita Falls, Wichita County, Texas</p>
<p>Episcopal Church of the Good Shepherd  1109 10th St.  Wichita Falls, Texas  LOT 7-A REPLAT BLK 190 ORIGINAL TOWN, Wichita Falls, Wichita County, Texas</p>
<p>Episcopal Church of St. John the Divine  1000 S. Berry St.</p>

Burkburnett, Texas 76354 75 X 236 ABST. 322 C WINTERS, Burkburnett, Wichita County, Texas
Episcopal Church of St. John the Divine 1006 S. Berry St. Burkburnett, Texas 76354 1.414 AC ABST. 322 C WINTERS, Burkburnett, Wichita County, Texas
Ascension/St. Mark's Episcopal Church 5094 U.S. Highway 380 Bridgeport, Texas 76426 Acres: 10.000 Abst: A-241 JL DILLINGHAM, Bridgeport, Wise County, Texas
Church of the Holy Spirit/Holy Spirit Episcopal Church 1102 Hillcrest Dr. Graham, Texas 76450 Lot 1 and 2 Block 11, Airport Addition, Graham, Young County, Texas
Church of the Holy Spirit/Holy Spirit Episcopal Church Estes Park Hillcrest Graham, Texas 76450 Lot 10, Block 2, Estes Park Hillcrest, Graham, Young County, Texas
St. Mary's Episcopal Church 120 W. or 122 E. Main South College and Hwy 36 West Hamilton, Texas 76531 Lot 3 Blk 8 (1) Original 100 X 100 Hamilton County, Texas
<b>PART 2: Properties in possession of Plaintiffs/Episcopal Parties:</b>
All Saints Episcopal Church 5001 Crestline Rd Fort Worth, Texas 76107 Chamberlain Arlington Heights 1st, S 122' W15'24 S 122'21 to 23, Block 15; Fort Worth, Tarrant County, Texas
All Saints Episcopal Church 4936 Dexter Ave. Fort Worth, Texas 76107 Chamberlain Arlington Heights 1st, S 122' W15'24 S 122'21 to 23, Block 15; Fort Worth, Tarrant County, Texas



<p>All Saints Episcopal Church  4939 Dexter Ave.  Fort Worth, Texas 76107  Chamberlain Arlington Heights 1st, Blk 25, W 90' Lot A; Fort Worth, Tarrant County, Texas</p>
<p>All Saints Episcopal Church  5001 Dexter Ave.  Fort Worth, Texas 76107  Chamberlain Arlington Heights 1st, Blk 26, Lots 1 &amp; 2; Fort Worth, Tarrant County, Texas</p>
<p>All Saints Episcopal Church  5003 Dexter Ave.  Fort Worth, Texas 76107  Chamberlain Arlington Heights 1 ST , BLK 26 LTS 5A 6 7 8 &amp; 9A; Fort Worth, Tarrant County, Texas</p>
<p>All Saints Episcopal Church  5005 Dexter Ave.  Fort Worth, Texas 76107  Chamberlain Arlington Heights 1st Blk 26, Lot 3R; Fort Worth, Tarrant County, Texas</p>
<p>St. Christopher's Episcopal Church  3550 SW Loop 820  Fort Worth, Texas 76133  South Hills Addition, Blk 41, Lot B; Fort Worth, Tarrant County, Texas</p>
<p>St. Elisabeth's Episcopal Church  5910 Black Oak Lane  River Oaks, Texas 76114  Saint Elizabeths Subdivision, Lots 23B, 24B &amp; 25B; River Oaks, Tarrant County, Texas</p>
<p>St. Luke-in-the-Meadow Episcopal Church  4301 Meadowbrook Dr.  Fort Worth, Texas 76103  Meadowbrook Addition, Blk 1 Lot A; Fort Worth, Tarrant County, Texas</p>
<p>St. Luke-in-the-Meadow Episcopal Church  4312 Lambeth Lane  Fort Worth, Texas  Meadowbrook Addition, Blk 1 Lot 16A; Fort Worth, Tarrant County, Texas</p>
<p>St. Stephen's Episcopal Church  5023 Lindale  Wichita Falls, Texas 76310</p>

Lot 2 St. Stephens Subdivision, Wichita Falls, Wichita County, Texas
<b>PART 3: Miscellaneous Properties:</b>
Seven (7) tracts, being 144.081 acres more or less, located in the MEP and PRR Co. Survey, Abstract No. 937 and the HR Moss Survey, Abstract No. 888, Parker County, Texas, as described in Warranty Deed dated December 14, 1962, recorded in Volume 346, Page 446, Deed Records, Parker County, Texas and Amendment of Oil, Gas and Mineral Lease dated June 26, 2007 with XTO Energy Inc., recorded in Vol. 2614 Page 1345 of the Deed Records of Parker County, Texas.
1.80 acres of land, more or less, being lot 26R, Block 5, out of the Trentman City Addition, an addition to the City of Fort Worth, Tarrant County Texas, according to that certain plat recorded in Volume B, Page 3337 of the Plat Records of Tarrant County, Texas.
Property previously used for the Crowley Church Plant, in Tarrant County, Texas.
Property in Oklahoma, for use of Good Shepherd Episcopal Church, Wichita Falls.

**EXHIBIT B-1  
Parish and Mission Funds**

<b>Church</b>	<b>Location</b>	<b>Specific Funds or Accounts</b>
ALL SAINTS' EPISCOPAL CHURCH	Fort Worth	<ul style="list-style-type: none"> <li>• Men's Club</li> </ul>
ALL SAINT'S EPISCOPAL CHURCH	Weatherford	<ul style="list-style-type: none"> <li>• E.D. Farmer Foundation/Fund</li> <li>• All Saints Foundation</li> </ul>
ALL SAINT'S EPISCOPAL CHURCH	Wichita Falls	<ul style="list-style-type: none"> <li>• Burns Chapel Fund</li> <li>• Episcopal School Fund</li> <li>• Grace Gould Memorial Trust</li> </ul>
CHRIST THE KING EPISCOPAL CHURCH	Fort Worth	<ul style="list-style-type: none"> <li>• Merrill Lynch</li> </ul>
EPISCOPAL CHURCH OF THE GOOD SHEPHERD	Wichita Falls	<ul style="list-style-type: none"> <li>• Burns Chapel Fund</li> <li>• Episcopal School Fund</li> </ul>
EPISCOPAL CHURCH OF THE GOOD SHEPHERD	Wichita Falls	<ul style="list-style-type: none"> <li>• Episcopal School Fund</li> <li>• Burns Chapel Fund</li> </ul>
ST. ANDREW'S EPISCOPAL CHURCH	Fort Worth	<ul style="list-style-type: none"> <li>• 1985 Permanent Fund of St. Andrew's Episcopal Church Fort Worth; J. Fischer, Trustee, Bank One;</li> <li>• Cynthia Brants Charitable Remainder Unitrust;</li> <li>• Dave T. Miller Trust</li> <li>• 1985 St. Andrew's Permanent Fund</li> <li>• Depositories in Louisiana;</li> <li>• Carrie McFarland Charitable Trust;</li> <li>• Eddleman McFarland Trust;</li> <li>• Flora Foust Educational Fund;</li> <li>• Rose Lafferty Educational Fund;</li> <li>• M Anderson Farms Fund</li> </ul>

ST. ANNE'S EPISCOPAL CHURCH	Fort Worth	<ul style="list-style-type: none"> <li>• Endowment (Jerry Nelson)</li> </ul>
ST. JOHN'S EPISCOPAL CHURCH	Fort Worth	<ul style="list-style-type: none"> <li>• St. John's Foundation</li> <li>• E.D. Farmer Fund</li> </ul>
ST. STEPHEN EPISCOPAL CHURCH	Hurst	<ul style="list-style-type: none"> <li>• Stock Funds</li> </ul>
ST. MARY'S EPISCOPAL CHURCH	Hamilton	<ul style="list-style-type: none"> <li>• Book of Remembrance Memorial Fund</li> <li>• Window Building Fund</li> <li>• Endowment Fund</li> <li>• Extraco Bank</li> <li>• First State Bank Central Texas</li> <li>• Soloman-Smith Barney Allocation Series</li> </ul>
ST. MARY'S EPISCOPAL CHURCH	Hillsboro	<ul style="list-style-type: none"> <li>• Edward Jones</li> <li>• Citizens National Bank</li> </ul>
ST. STEPHEN'S EPISCOPAL CHURCH	Wichita Falls	<ul style="list-style-type: none"> <li>• Burns Chapel Fund</li> <li>• Episcopal School Fund</li> </ul>