

DISTRICT COURT, EL PASO COUNTY, COLORADO
Court Address: 270 S. Tejon (80903), P.O. Box 2980
Colorado Springs, CO 80901
Phone Number: (719) 448-7577

Plaintiff and Counterclaim Defendant:

GRACE CHURCH & ST. STEPHEN'S, a Colorado nonprofit corporation,

v.

Defendants and Counterclaimants:

THE BISHOP AND DIOCESE OF COLORADO, a Colorado nonprofit corporation, and THE EPISCOPAL CHURCH,
and

Third Party Counterclaimants:

THE DIOCESE OF COLORADO IN THE EPISCOPAL CHURCH; GRACE AND ST. STEPHEN'S EPISCOPAL CHURCH; and GRACE CHURCH AND ST. STEPHEN'S, a Colorado religious society and corporation,

v.

Counterclaim Defendants:

REV. DONALD ARMSTRONG III, et al.

Additional Counterclaim Defendant:

Rt. Rev. Robert J. O'Neill

Attorneys for Defendant and Third Party Plaintiffs:

L. Martin Nussbaum, Atty. Reg. # 15370
ROTHGERBER JOHNSON & LYONS LLP
90 South Cascade Avenue, Suite 1100
Colorado Springs, CO 80903
Phone Number: (719) 386-3000
Fax Number: (719) 386-3070
E-mail: mnussbaum@rothgerber.com

• COURT USE ONLY •

Case Number: 2007-CV-1971

DIV. COM5

**EPISCOPAL CHURCH ENTITIES
THIRD SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES
(COMMERCIAL DOCKET)**

Defendant and Third Party Plaintiffs, through Rothgerber Johnson & Lyons LLP, hereby submit these supplemental disclosures pursuant to C.R.C.P. 26 (a)(1):

Individuals

A. The individuals likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings are:

1. Derry Adams, 2 N. Cascade Avenue; Suite 1000, Colorado Springs, CO 80903. (719) 633-8500. Ms. Adams has information regarding the parish history, its corporate affairs, its canonical status, discussions related to secession, and other matters related to this case.

2. Father Donald S. Armstrong, 601 N. Tejon Street, Colorado Springs, CO, 80903. Father Armstrong has information regarding the actions of the vestry prior to and subsequent to the vote of secession, management of financial and corporate affairs, and other matters related to this case.

3. Barbara Bailey, 6250 Wilson Road, Colorado Springs, CO 80919. (719) 260-6422. Ms. Bailey is a former vestry member who has information regarding the organizational, corporate, and financial management and other matters related to this case.

4. Bob Balink, 2510 Heathrow Drive, Colorado Springs, CO 80920. (719) 533-1942. Mr. Balink has served as a member of the Vestry since 2006. Mr. Balink has information regarding the financial, organizational, and corporate affairs of the parish, the actions of the Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

5. Michael R. Barber, 20 Leming Road, Colorado Springs, CO 80906. (719) 447-9669. Mr. Barber was elected to the vestry in January 2007. He has information regarding the financial, organizational, and corporate affairs of the parish, the actions of the Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

6. Sheri Betzer, Betzer, Critchfield & Call LLP, 1725 Gaylord Street, Denver, CO, 80206. (303) 329-9700. Sheri Betzer is the forensic accountant hired by the Diocese to review the financial records of Grace Church. She has information regarding the financials of the Church, embezzlement by Father Armstrong, and other matters related to this case.

7. Charles C. Brown, address currently unknown. Mr. Brown has information regarding the financial, organizational, and corporate affairs of the parish, the actions of the

Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

8. Ed Brown, 1627 N. Royer Street, Colorado Springs, CO 80907. (719) 475-9490. Mr. Brown is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

9. The Rev. Kenneth Burton, 472 Crystal Hills Boulevard, Manitou Springs, CO 80829. (719) 685-5766. Rev. Burton has information regarding the parish history and other issues in this case.

10. Garry Butcher, 1775 Pinnacle Ridge Lane, Colorado Springs, CO 80919. (719) 593-8381. Mr. Butcher is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

11. Robert Carlile, 5005 Crestwood Drive, Colorado Springs, CO 80918. (719) 528-6641. Mr. Carlile is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

12. Sharon Caulfield, 1800 Broadway, Suite 200, Boulder, CO 80302. (303) 443-8010. Ms. Caulfield is a vice-chancellor of the Diocese who has information regarding enforcement of canonical requirements, corporate structure of parishes, Diocesan templates for parish corporations, and other issues relevant to this case.

13. Verne P. Collier, last known address 2629 Holiday Lane, Colorado Springs, CO 80909. Mr. Collier is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

14. Father Alan R. Crippen II, 601 N. Tejon Street, Colorado Springs, CO 80903. Father Crippen is the President of the John Jay Institute that operates from Grace Church property. Father Crippen has been the primary spokesperson for the CANA parish after secession. Father Crippen will have information regarding the management of the Church, matters mentioned in his expert report, matters mentioned in documents he produced, and other matters related to this case.

15. Clelia deMoraes, 1202 W. Pike Peak, Colorado Springs, CO 80904. (719) 633-6807. Ms. deMoraes is a member of the McJimsey Vestry. Ms. deMoraes has information regarding Grace Episcopal Parish and other matters related to this case.

16. Kevin Dibble, 5555 Tech Center Drive, Suite 200, Colorado Springs, CO 80919. Mr. Dibble is a current vestry member and has information regarding the possession of the property, secession, and other matters related to this case.

15.1 The Rev. Dr. Ian T. Douglas, Episcopal Divinity School, 99 Brattle Street, Cambridge, MA 02138, 617-868-3450, has information regarding the subject matters addressed in his expert report.

17. Amy Duell, 2306 Lockheaven, Colorado Springs, CO 80907. (719) 633-7464. Ms. Duell is a member of the McJimsey Vestry. Ms. Duell has information regarding Grace Episcopal Parish and other matters related to this case.

18. Mark J. Duffy, 606 Rathervue Place, P.O. Box 2247, Austin, TX, 78768. (512) 480-0437. Mr. Duffy is the Director of Archives for The Archives of the Episcopal Church. He has information regarding the forming of the Missionary District of the North West, the Missionary Diocese of Colorado, and the Diocese of Colorado, and other matters related to this case.

19. James Edwards, last known address 2727 Chelton Road, Colorado Springs, CO 80909. Mr. Edwards is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

20. Chad Friese, The Argent Company, 511 N. Tejon, Suite 100, Colorado Springs, CO 80903. (719)442-6789. Mr. Friese is the current Junior Warden of the Secessionist Vestry and served as a vestry member prior to secession. Mr. Friese has information regarding the Secessionist Vestry's decisions to leave the Episcopal Church and recall Father Armstrong, communications with Bishop O'Neill, the loans with the State Bank of Bartley, and other matters related to this case.

21. Gracemary Greenleaf of 4321 E. Hale, # 301, Denver CO 80220 (mailing address: 700 Colorado Blvd., Box 116, Denver CO 80206), 303-988-1419, has information in rebuttal to the opinions expressed by various experts endorsed by plaintiff on the issues relating to the history of the Episcopal Diocese of Colorado, including but not limited to Rev. Donald Armstrong and Rev. Alan Crippen. Ms. Greenleaf will testify, for instance, about parish and diocesan missions within the Diocese and that they are subject to the National Canons and the Colorado Canons; and that parishes sponsoring missions do not thereby avoid such canon law or become dioceses unto themselves. She will testify regarding the role and creation of the Colorado Canons; and the history of parishes, such as St. John's Church in the Wilderness, Grace Church and St. Stephen's, the important roles they have played within the Diocese, and the fact that their histories confirm that they, too, are subject to the National Canons and the Colorado Canons.

22. AM Fowler-Mayer, 2924 Maryland Road, Colorado Springs, CO 80909. (719) 635-1727. Ms. Fowler-Mayer is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

23. Timothy Fuller, 115 East San Miguel Street, Colorado Springs, CO 80903. (719) 389-6000. Mr. Fuller was a vestry member from 2006 through January 2007. He has information regarding the management of Grace Church, the plans of the vestry to secede, the Anglican Communion Institute, the reconstitution of the vestry after March 2007, and other matters related to this case.

24. Larry Gaddis, 1911 North Tejon, Colorado Springs, CO 80907. (719) 634-2374. Mr. Gaddis is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

25. Ken Geddes, 530 S. Nevada Avenue, Colorado Springs, CO 80903. (719) 475-7090. Mr. Geddes parish history, parish corporate history, and other relevant issues.

26. Jack Gloriod, 1555 Napoli Way, Colorado Springs, CO 80906. (719) 630-3266. Mr. Gloriod was elected to the vestry in 2007. Mr. Gloriod also served on the Vestry from 1997-1999. Mr. Gloriod has information regarding the financial, organizational, and corporate affairs of the parish, the actions of the Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

27. Marge Goss, 7845 Gardiner Road, Cascade, CO 80809. (719) 684-2226. Ms. Goss served as Senior Warden from 2004-2006, as Junior Warden from 2001-2003 and as a member of the Vestry from 1998-2000. Ms. Goss has information regarding financial, organizational, and corporate affairs, the vestry's response to the inhibition and canonical investigation of Father. Armstrong, and other matters related to this case.

28. Hal Haddon, 150 E. 10th Avenue, Denver, CO, 80203. (303) 831-7364. Mr. Haddon was involved in the canonical investigation and trial of Father Armstrong. He has information regarding that process, its timing, arguments made by Father Armstrong, and other matters related to this case.

29. Helen Hazelton, 1116 E. Madison Street, Colorado Springs, CO 80907. (719) 633-7464. Ms. Hazelton is a member of the McJimsey Vestry. Ms. Hazelton has information regarding Grace Episcopal Parish, its history and art, and other matters related to this case.

30. Chuck Hemingsen, address unknown. Mr. Hemingsen is a former officer of Grace Church. He has information regarding the corporate history and Diocesan involvement of Grace Church, and other matters related to this case.

31. John Hermes, address and phone number unknown. Mr. Hermes is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

32. Rev. Robert Hewitt, P.O. Box 1132, Westcliff, CO 81252. (719) 793-9693. Father Hewitt served as Rector of Grace Church prior to Father Armstrong. He has information regarding the corporate organization of Grace Church, the various trust funds, and other matters related to this case.

33. Dr. John "Chip" Hill, 1545 Outrider Way, Monument, CO 80132. (719) 481-9642. Dr. Hill is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

34. Sarah Hogan, address and phone number unknown. Ms. Hogan is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

35. Rip Hollister, 1940 Hunters Point Lane, Colorado Springs, CO 80919. (719) 598-8917. Mr. Hollister was elected to the Vestry in January 2007. Mr. Hollister has information regarding the financial, organizational, and corporate affairs of the parish, the actions of the Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

36. Jason Huntley, address and phone number unknown. Mr. Huntley was elected to the vestry in January 2007. Mr. Huntley has information regarding the financial, organizational, and corporate affairs of the parish, the actions of the Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

37. Doug Jardine, 150 Sierra Vista Drive, Colorado Springs, CO 80906. (719) 576-6303. Mr. Jardine has information regarding the disputed property including information regarding the harm to the McWilliams House and its present condition and other matters relevant to this case.

38. Dr. Robert E. Jones, last known address 22 Friendship Lane, Colorado Springs, CO 80904. Mr. Jones is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

39. Phil Kilgore, 18135 Spur Ranch Road, Peyton, CO 80831. (719) 749-2662. Mr. Kilgore is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

40. Emily Kline, 114 N. Meade Avenue, Colorado Springs, CO 80909. (710-634-8035. Ms. Kline was elected to the Vestry in January 2007. Ms. Kline previously served on the Vestry from 2000-2003. Ms. Kline has information regarding the financial, organizational, and corporate affairs of the parish, the actions of the Vestry leading to the March 26, 2007, secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

41. Most Rev. Edward Konieczmy, 3888 27 1/2 Road, Grand Junction, CO, 81506. (970) 242-3293. Bishop Konieczmy served as the Chair of the Diocesan Standing Committee and has information relevant to the Diocese, the investigation of the Father Armstrong, and other matters related to this case.

42. Jack Laurel, address and phone number unknown. Mr. Laurel is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

43. Elizabeth Lilly, 150 Miramar Drive, Colorado Springs, CO 80906. (719) 579-0705. Ms. Lilly is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

44. Terry Lilly, 150 Miramar Drive, Colorado Springs, CO 80906. (719) 579-0705. Mr. Lilly is a former vestry member who has information regarding organizational, corporate, financial, trust, and other issues in this case.

45. Beth Matthews, 310 West 17th Street, P.O. Box 164668, Little Rock, AR 72216. (501) 372-2168. Ms. Matthews is the Bishop's Administrative Assistant and the Register for the Diocese of Arkansas. Ms. Matthews has information regarding the ordination of Father Armstrong as a deacon and priest, and other matters related to this case.

46. Mrs. Jack McCullough, last known address 3908 Meadow Lane, Colorado Springs, CO 80909. Mrs. McCullough is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

47. Paul McCusker, 2925 Helmsdale Drive, Colorado Springs, CO 80920. (719) 266-6242. Mr. McCusker is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

48. Marianna McJimsey, 119 E. San Miguel Street, Colorado Springs, CO 80903. (719) 471-1765. Ms. McJimsey has served as the clerk of the vestry since at least 1994. Ms. McJimsey has information regarding the content of the vestry meetings, the events leading up to the March 26, 2007 secession vote, parish history and art, and other matters related to this case.

49. Robert McJimsey, 119 E. San Miguel Street, Colorado Springs, CO 80903. (719) 471-1765. Mr. McJimsey has served as a member of the vestry from 1999-2001, and 2005-present. Mr. McJimsey also previously served as Senior Warden. Mr. McJimsey has knowledge regarding the financial, organizational, and corporate management, the investigation of Father Armstrong, the vestry's actions regarding the investigation of Father Armstrong, the events leading up to the March 26, 2007 secession vote and other matters related to this case.

50. Ted V. Middle, last known address 2022 Eagle View Drive, Colorado Springs, CO 80909. Mr. Middle is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

51. Edwin J. Montgomery, 17840 New London Road, Monument, CO 80132. (719) 488-2751. Mr. Montgomery is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

52. Jana Moyers, 1425 LaMesa Street, Colorado Springs, CO 80904. (719) 575-0021. Ms. Moyers was a volunteer in the parish offices for approximately eleven years. Ms. Moyers has information regarding document shredding, violation of the temporary inhibition, and other matters related to this case.

53. Dr. Robert Bruce Mullin, The General Theological Seminary, 175 Ninth Avenue, New York, NY 10011. (212) 243-5150. Dr. Mullin is an expert in subjects as indicated in his affidavit and curriculum vitae. He has information as indicated in his affidavit.

54. John Newsome, 2120 Orchard Valley Road, Colorado Springs, CO 80919. (719) 520-6000. Mr. Newsome served as Junior Warden from January to March 2007. Mr. Newsome previously served as a vestry member from 2004-2006. Mr. Newsome has information regarding financial, organizational, and corporate affairs, the vestry's response to the inhibition and canonical investigation of Father Armstrong, and other matters related to this case.

55. Carol Nuss, 4975 Cliff Point Circle E, Colorado Springs, CO 80919. (719) 594-2079. Ms. Nuss is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

56. Rev. Michael O'Donnell, 4940 Shirley Place, Colorado Springs, CO 80920. (719) 282-6663. Father O'Donnell was an Associate Rector under Father Armstrong. Father O'Donnell has information regarding the changing of the parish locks prior to the vote to secede, Father Armstrong's management of the parish, the events leading to the secession vote, the present ministries and activities of Grace and St. Stephen's Episcopal Church, and other matters related to this case.

57. Right Reverend Robert J. O'Neill, Bishop of the Diocese of Colorado, 1300 Washington Street, Denver, CO 80203. (303) 837-1173. Bishop O'Neill has information regarding the canonical investigation of Father Armstrong, the Episcopal Church, the Diocese of Colorado, the role of canon law within the Diocese and the Episcopal Church, the Diocese's relationship with Grace and St. Stephen's Episcopal Church, the CANA parish, the abandonment of the Episcopal Church by the Individual Counterclaim Defendants, and other matters related to this case.

58. Father John Pahls (address undetermined) has information regarding the present ministries and activities of Grace and St. Stephen's Episcopal Church, and other matters related to this case.

59. Dr. E. R. Peterson, last known address 1455 La Mesa Street, Colorado Springs, CO 80904. 719-635-2345. Mr. Peterson is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

60. George "Pat" Patterson, 3640 East Wade Lane, Colorado Springs, CO 80917. (719) 574-4343. Mr. Patterson is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

61. Roland Paulson, last known address 2205 Parnian Way, Colorado Springs, CO 80909. Mr. Paulson is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

62. Father Marty Pearsall (address undetermined) has information regarding the present ministries and activities of Grace and St. Stephen's Episcopal Church, and other matters related to this case.

63. Beth Phillips, 2530 Paseo Rojo, Colorado Springs, CO 80904. (719) 634-6826. Ms. Phillips is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

64. Jim Phillips, 2530 Paseo Rojo, Colorado Springs, CO 80904. (719) 634-6826. Mr. Phillips is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

65. Deke Polifka, 2012 Oak Way, Upper Floor, Colorado Springs, CO 80906. (719) 633-7956. Mr. Polifka serves as the Music Director for Grace and St. Stephen's Episcopal Church and has information regarding the events leading to secession, and other issues in this case.

66. Father Ephraim Radner, address and phone number unknown. Father Radner has information regarding the teaching and statements of Father Armstrong during the canonical investigation and at other times, and other matters related to this case.

67. Kerry D. Riehl, 322 Cranbrook Drive, Colorado Springs, CO 80906-5134. Ms. Riehl has information regarding Dr. Stampher and regarding removing documents from the Tejon Street property.

68. Robert C. Royce, Esq., 1908 Inverness Lane, Wilmington, NC 28405. (910)-256-4655. Mr. Royce is an expert in expert in subjects as indicated in his affidavit and curriculum vitae. He has information as indicated in his affidavit.

69. Dareleen Schaffer, 5015 Barcelona Way, Colorado Springs, CO 80917. (719) 574-5981. Ms. Schaffer has served as parish and as CANA parish bookkeeper. Ms. Schaffer has information regarding the financial, organizational, and corporate management by Father Armstrong, document shredding, and other matters related to this case.

70. John Scrivner, 350 Arequa Ridge Drive, Colorado Springs, CO 80919. (719) 599-7714. Mr. Scrivner is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

71. Margo Sedgley, address and phone number unknown. Ms. Sedgley is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

72. Frear Simons, 1602 West Kiowa, Colorado Springs, CO 80904. (719) 632-1678. Ms. Simons is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

73. John Simons, 1602 West Kiowa, Colorado Springs, CO 80904. (719) 632-1678. Mr. Simons served as Junior Warden from 1995-1997, as Senior Warden from 1998-2000, and as former Senior Warden from 2001-2003. Mr. Simons has information regarding organizational, corporate, financial, and other issues in this case.

74. Alice Snere, address and phone number unknown. Ms. Snere served as the Parish bookkeeper. Ms. Snere has information regarding organizational, corporate, financial, and other issues in this case.

75. Susan Spears, 5610 Wilson Road, Colorado Springs, CO 80919. (719) 533-0001. Ms. Spears is the administrative assistant to Father Armstrong. Ms. Spears has information regarding organizational, corporate, financial, and other issues in this case.

76. Susan Spencer, 555 Buckeye Drive, Colorado Springs, CO 80919. (719) 598-5149. Ms. Spencer is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

77. Rev. Leroy Soper, address and phone number unknown. Father Soper served as the Parish Chaplain from 1998-2004. Mr. Soper has information regarding organizational, corporate, financial, and other issues in this case.

78. Dr. Keith Stampher, 7170 Silverpond Heights, Colorado Springs, CO 80908. (719) 495-6280. Dr. Stampher was elected to the vestry in 2005 and served as a vestry member from 2001-2003. Dr. Stampher has information regarding the financial affairs of the parish, the actions of the Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

79. Rebekah Taft (deceased).

80. Jerry Teske, last known address 2414 E. Caramillo, Colorado Springs, CO 80909. Mr. Teake is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

81. Father Robert G. Thompson, 9987 W. Oregon Place, Lakewood, CO 80323. (303) 988-5836. Father Thompson is a former Curate who has information regarding organizational, corporate, financial, and other issues in this case.

82. Thomas Vandezande, last known address P.O. Box 293, Cascade, CO 80909. Mr. Vandezande is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

83. Cheryl Vossekuil, address and phone number unknown. Ms. Vossekuil is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

84. Ken Von der Heiden, P.O. Box 2109, Fraiser, CO 80422. (970) 726-5189. Mr. Von der Heiden is the temporary replacement for Rev. Edward Konieczny as Chair of the Diocesan Standing Committee. He has information regarding the Diocese, the canonical investigation of Father Armstrong, and other matters related to this case.

85. Ian Walker, 4212 Star Vista Court, Colorado Springs, CO 80906. (719) 576-4271. Mr. Walker is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

86. Rev. Theron Walker, address and phone number unknown. Father Walker served as the Associate Rector/Vicar from 2001-2005. Father Walker has information regarding the management of financial, organizational, and corporate issues in this case.

87. Jill Wasinger, 1627 N. Nevada Avenue, Colorado Springs, CO 80907. (719) 473-7366. Ms. Wasinger has served as the parish nurse since 1993. Ms. Wasinger has information regarding document shredding, violation of the temporary inhibition, and other matters related to this case.

88. David Watts, 1014 West Cheyenne Road, Colorado Springs, CO 80906. (719) 389-0050. David Watts has attended Grace Church since approximately 1984 and served on the vestry from 1999-2001. He has knowledge regarding the management of Grace Church, actions of the CANA parish since the secession vote, and other matters related to this case.

89. B. J. Wear, address and phone number unknown. Ms. Wear is a former vestry member who has information regarding organizational, corporate, financial, and other issues in this case.

90. Craig Whitney, 1700 N. Cascade Avenue, Colorado Springs, CO 80907. (719) 475-0504. Mr. Whitney was elected to the Vestry in 2005. Mr. Whitney previously served as Senior Warden from 2001-2003, and Junior Warden from 1998-2000. Mr. Whitney has information regarding the financial affairs of the parish, the actions of the Vestry leading to the March 26, 2007 secession vote, the response of the vestry to the canonical investigation and inhibition of Father Armstrong, and other matters related to this case.

91. Don Whitmore, 444 East Pikes Peak Avenue, Colorado Springs, CO 80903. (719) 636-5091. Mr. Whitmore is the Chief Title Officer for LandAmerica Title. He has information regarding the property records, legal title, and other information relevant to this case.

92. George Wing, 8 South Nevada Avenue, Colorado Springs, CO 80901. (719) 635-4716. Mr. Wing is the Chair of the Alienation and Encumbrance Committee for the Diocese of

Colorado. Mr. Wing has information regarding the Alienation and Encumbrance Committee and other Diocesan committees on which he served.

93. Nancy Woodward, 1360 Birch Street, Denver, CO 80220-2428. (303) 377-4074. Ms. Woodward serves as the Archivist for the Diocese of Colorado. Ms. Woodward has knowledge regarding the history of the Diocese of Colorado, its cathedral, and Grace and St. Stephen's, and other matters related to this case.

94. Rev. Dr. Robert Wright, 175 Ninth Avenue, New York, NY 10011. (212) 741-3544. Rev. Wright is an expert in subjects as indicated in his affidavit and curriculum vitae. He has information as indicated in his affidavit

95. Jon Wroblewski, 17710 Merryhill Court, Monument CO 80132. (719) 481-9307 Mr. Wroblewski served as Senior Warden from 2004-March 26, 2007. Mr. Wroblewski purports to serve as Senior Warden of the Grace CANA congregation. Mr. Wroblewski has information regarding financial affairs, actions leading to the secession vote, and other matters related to this case.

96. Deacon Sally Ziegler, 3305 Paseo del Oro, Colorado Springs, CO 80904. (719) 648-9350. Ms. Ziegler has served as Deacon since 1998. Ms. Ziegler has information regarding the management of financial affairs, the actions leading to the vote to secede, and other matters related to this case.

97. Father Eric Zolner, 7115 Ashley Drive, Colorado Springs, CO 80922. (719) 573-5440. Father Zolner is a former priest serving at Grace and St. Stephen's Episcopal Church and now serves at the CANA parish. Father Zolner has information regarding the management of financial affairs, the actions leading to the vote to secede, CANA, and other matters related to this case.

98. One or more representatives from the Internal Revenue Service to testify about matters involving the Employee Identification Number and the group ruling.

99. One or more representatives from the Church Insurance Company.

96. One or more individuals to testify about the history of the Episcopal Church in Colorado.

97. One or more individuals to testify about Episcopal artwork and other related topics as evidenced within the Property.

98 One or more individuals to testify about the relationship of St. Stephen's Classical Academy to the plaintiff, the disputed property, and Grace and St. Stephen's Episcopal Church.

Documents

B. The following relevant documents and tangible things are in the possession of the Defendant and Third Party Plaintiffs. These documents have been previously provided and are, therefore, not attached.

1. 1859 Journal of the General Convention. (Prev. Sub-Ex. H-1).
2. The Episcopal Church in Colorado 1860-1963, Allen Du Pont Breck, Ph.D. (Prev. Sub-Ex. B-2).
3. 1865 House of Clerical and Lay Disputes. (Prev. Sub-Ex. H-2).
4. Vestry Minutes 10-14-1873. (Prev. Ex. O-2).
5. 1874 Certificate of Incorporation. (Prev. Ex. J).
6. Board of Missions Financial Reports from 1890-91, 1893, and 1895. (Prev. Ex. H-3).
7. The Constitution and Canons for the Government of the Episcopal Church in the Diocese of Colorado 1886 to 1992.
8. 1887 Journal of the Primary counsel of Colorado. (Prev. Ex. B-3).
9. Affidavit of Incorporation, 12-21-23. (Prev. Ex. K).
10. Parish resolution 12-19-23 .
11. Journal of the Thirty-eighth Annual Council of the Diocese of Colorado, Feb. 12-14-24.
12. Diocese of Colorado Diocesan Institutions Constitution Canons Charters By-laws 1928.
13. 1928 Selections from The 1928 Book of Common Prayer. (Prev. Sub-Ex. L-2)
14. 1928 Book of Common Prayer.

15. 10-14-29 Indenture of Alice B. Taylor. (Prev. Ex. AI).
16. Instrument of Donation dated 11-15-29. (Prev. Ex. T).
17. Carpenter Trust Agreement, 3-17-31.
18. Anne H. Gates Will, 6-27-33. (Prev. Ex. AH)
19. Parochial Report 1-1-50 to 12-31-50.
20. Parochial Report 1-1-52 to 12-31-52.
21. Parochial Report 1-1-53 to 12-31-53.
22. Parochial Report 1-1-54 to 12-31-54.
23. Parochial Report 1-1-55 to 12-31-55.
24. Parochial Report 1-1-56 to 12-31-56.
25. Last Will and Testament of Irene Carlson, 11-16-56.
26. Parochial Report 1-1-57 to 12-31-57.
27. Parochial Report 1-1-58 to 12-31-58.
28. Parochial Report 1-1-59 to 12-31-59.
29. Parochial Report 1-1-60 to 12-31-60.
30. Parochial Report 1-1-61 to 12-31-61.
31. Parochial Report 1-1-62 to 12-31-62.
32. Vestry Minutes, 7-5-63.
33. Bylaws, 8-23-63. (Prev. Ex. AK).
34. Parochial Report 1-1-63 to 12-31-63.

35. Parochial Report 1-1-63 to 12-31-63, Part 2.
36. Letter dated 3-17-64 from Fischer to Martin.
37. Letter dated 11-19-64 from Martin to Bishop Minnis.
38. Parochial Report 1-1-64 to 12-31-64.
39. Letter dated 3-4-65 from Marsh to Fischer.
40. Letter dated 4-9-65 from Bunker to Marsh.
41. 1965 Report of Treasurer's Funds Only.
42. Parochial Report 1-1-65 to 12-31-65.
43. 3-3-66 Last Will of Ralph O. Giddings, Jr. (Prev. Ex. AJ).
44. Parochial Report 1-1-66 to 12-31-66.
45. Trust Agreement of Gwendolyn Koch, 6-15-67.
46. Parochial Report 1-1-67 to 12-31-67.
47. Parochial Report 1-1-68 to 12-31-68.
48. Parochial Report 1-1-69 to 12-31-69.
49. 1970 Grace Episcopal Church Annual Report.
50. Letter dated 6-24-71 from Hewitt to Thayer.
51. Parochial Report 1-1-70 to 12-31-70.
52. Parochial Report 1-1-71 to 12-31-71.
53. 1972 An House Not Made With Hands, Mary Louise Perkins. (Prev. Sub-Ex. B-1) (Prev. Ex. CR-1) (Prev. Ex. CS-1).
54. Parochial Report 1-1-72 to 12-31-72.

55. All minutes of vestry annual parish meetings from 1973 through 1975 or any other date.
56. 1973 "Articles of Incorporation." (Prev. Sub-Ex. X-1).
57. 6-18-73 Vestry Minutes. (Prev. Sub-Ex. X-2).
58. 6-18-73 Vestry Minutes. (Prev. Sub-Ex. Y-2).
59. Nonprofit Certificate of Incorporation dated 6-25-73.
60. Bylaws Governing the Parish of Grace Church and St. Stephen's Adopted 2-25-74.
61. 6-25-73 Articles of Incorporation. (Prev. Sub-Ex. X-1).
62. 1973 Vestry minutes. (Prev. Ex. AL).
63. 1973 "Articles of Incorporation." (Prev. Sub-Ex. Y-1).
64. Parochial Report 1-1-73 to 12-31-73.
65. 1974 Vestry minutes adopting bylaws. (Prev. Ex. AM).
66. 1-21-74 Vestry minutes. (Prev. Ex. CD).
67. 1-23-74 Father Hewitt letter to Bishop Frey. (Prev. Ex. AN).
68. 1-28-74 Bishop Frey letter to Father Hewitt. (Prev. Ex. AO).
69. 2-25-74 Bylaws Governing the Parish of Grace Church and St. Stephen's. (Prev. Sub-Ex. C-5).
70. 3-18-74 Last Will and Testament of Clarice C. Bowton.
71. 1974 Bylaws. (Prev. Sub-Ex. X-3).
72. Parochial Report 1-1-74 to 12-31-74.
73. 1-14-75 Last Will and Testament of Helen J. Smith.

74. 6-13-75 Codicil to Last Will and Testament of Helen J. Smith.
75. 7-23-75 Dr. Jones letter to Bishop Frey. (Prev. Ex. AP).
76. Parochial Report 1-1-75 to 12-31-75.
77. 2-18-76 Letter to Bishop Frey. (Prev. Ex. AQ).
78. 3-26-76 Diocese of Colorado Application for Consent to Encumber Church Property.
79. 11-22-76 Motion by Colorado Springs National Bank re Helen J. Smith Estate.
80. 11-22-76 Order, Case No. 06758, Estate of Helen J. Smith. (Prev. Ex. AH).
81. Parochial Report 1-1-76 to 12-31-76.
82. 2-27-77 Covenant Between Grace Church & St. Stephen's and St. Francis of Assisi Episcopal Mission. (Prev. Ex. AR).
83. 3-16-77 Robert Gotchey letter to Bishop Frey. (Prev. Ex. AS).
84. 11-7-77 Father Armstrong Accession Statement. (Prev. Sub-Ex. L-1).
85. Parochial Report 1-1-77 to 12-31-77.
86. Parochial Report 1-1-78 to 12-31-78.
87. 9-13-79 Message #75 Received from the 1976 House of Bishops. (Prev. Sub-Ex. V-5).
88. 9-15-79 Message #76 Received from the 1976 House of Bishops. (Prev. Sub-Ex. V-6).
89. 9-19-79 House of Deputies Daily Journal. (Prev. Sub-Ex. V-7).
90. Parochial Report 1-1-79 to 12-31-79.
91. Preface to Book of Common Prayer 1979. (Prev. Sub-Ex. V-4).
92. 1979 Book of Common Prayer.

93. 2-13-80 Canon Christopher letter to Rebecca Taft. (Prev. Ex. AT).
94. 4-10-80 Canon Christopher letter to Rebecca Taft. (Prev. Ex. AU).
95. 11-6 to 8-80 Diocesan Journal. (Prev. Ex. AV).
96. Letter dated 6-23-80 Rice to Christopher.
97. Letter dated 6-30-80 Christopher to Rice.
98. Parochial Report 1-1-80 to 12-31-80.
99. Articles of Incorporation of St. John's Church in the Wilderness dated 2-26-81.
100. Parochial Report 1-1-81 to 12-31-81.
101. Articles of Incorporation of Church of the Good Shepherd, Episcopal dated 1-30-82.
102. 11-8 to 9-84 Diocesan Journal. (Prev. Ex. AW).
103. Parochial Report 1-1-84 to 12-31-84.
104. Amended and Restated Articles of Incorporation of St. John's Church in the Wilderness dated 2-6-85.
105. Parochial Report 1-1-85 to 12-31-85.
106. 3-11-86 Diocesan Executive Council minutes. (Prev. Ex. AX).
107. Petition for a Writ of Certiorari to the Supreme Court of Colorado, dated 6-24-86, Mote v. Diocese of Colorado.
108. Brief for Respondents in Opposition, dated 7-28-86, Mote v. Diocese of Colorado, No. 85-2093 (two pages).
109. 1-14-87 McWilliams letter to First Interstate Bank of Denver, N.A. (Prev. Ex. CG).
110. Letter dated 1-31-87 from McHugh to Diocese of Colorado.

111. Statement of Opposition to Motion for Default Judgment as to St. Mark's Parish of Denver, Colorado Upon Cross-Claim, dated 3-24-87, St. Mark's Investment Corp. v. Smith Barney, 85CV1265.
112. 3-31-87 Bishop Frey letter to Harry McWilliams. (Prev. Ex. AY).
113. Letter dated 4-27-87 from Bishop Frey to McWilliams.
114. Quit Claim Deed from St. Mark's Parish of Denver, Colorado, a Colorado non-profit corporation to Bishop and Diocese of Colorado, A Colorado non-profit corporation dated 5-26-87.
115. Letter dated 12-18-87 Foster to Minot.
116. 1-31-88 Parish meeting minutes. (Prev. Ex. AZ).
117. 7-12-88 Father Armstrong letter to Bishop Frey. (Prev. Ex. BA).
118. 1989 Father Armstrong letter and application to Diocese for approval of encumbrance. (Prev. Ex. BB).
119. 11-13-89 Father Armstrong letter to Charles Kirk. (Prev. Ex. BC).
120. 11-17 to 18-89 Diocesan Executive Council minutes. (Prev. Ex. BD).
121. 1-1-90 Grace Church & St. Stephen's Parish Long Range Plan.
122. Feb. 23-25-90 Diocese of Colorado Journal of the One Hundred and Third Annual Convention.
123. Grace Church & St. Stephen's Parish, 1990 Long Range Plan.
124. 2-12-91 Father Armstrong letter to Bishop Winterrowd. (Prev. Ex. BE).
125. 6-27-91 Father Armstrong letter to Bishop Winterrowd. (Prev. Ex. BF).
126. 9-10-91 Vestry resolution.
127. Letter dated 6-4-92 from Thomas to Bishop Winterrowd.

128. Letter dated 9-17-92, Wills, Esq., copies Don Armstrong, to Bishop, for Grace and St. Stephen's Episcopal Church. (Prev. Ex. U).

129. Warranty Deed dated 2-15-95 between Copper Valley Builders, Inc. and Donald Armstrong III and Jessie H. Armstrong and Grace Church and St. Stephen's Parish, a Colorado nonprofit corporation.

130. Deed of Trust dated 2-15-95.

131. Assignment of Leases and Rents dated 2-15-95.

132. 1996 Fall Program Guide. (Prev. Ex. BG).

133. 12-19-86 letter from First Interstate Bank to Grace Church and St. Stephen's Parish. (Prev. Ex. CE).

134. 9-5-97 Father Armstrong letter to Bishop Winterrowd. (Prev. Ex. BH).

135. Vestry Minutes, 11-13-97.

136. Warranty Deed dated 11-26-97 between Grace Church and St. Stephen's, a Colorado nonprofit corporation and Heather J. Lauer.

137. Warranty Deed dated 12-1-97 between Donald Armstrong III and Jessie H. Armstrong and Grace Church and St. Stephen's Parish, a Colorado nonprofit corporation and Kathleen L. Vaughan.

138. Warranty Deed dated 12-1-97 between Byron William S. Nelson and Jean Eleanor Nelson, as Trustees of the Byron William S. Nelson Revocable Living Trust, Dated the 19th day of September, 1990, and Jean Eleanor Nelson and Byron William S. Nelson, as Trustees of the Jean Eleanor Nelson Revocable Living Trust Dated the 19th day of September, 1990 and Grace Church and St. Stephen's Parish, a Colorado nonprofit corporation.

139. 12-1-97 Warranty Deed (rectory). (Prev. Ex. BI).

140. Deed of Trust dated 12-1-97.

141. Letter dated 6-8-98 from O'Leary to Day.

142. Vestry Minutes, 10-8-98.

143. Letter dated 2-23-99 from O'Leary to Day.
144. Letter dated 3-5-99 from O'Leary to Armstrong.
145. Biennial Report, Grace Church & St. Stephen's, 6-7-99.
146. Vestry Minutes, 10-21-99.
147. Letter dated 5-8-00 from Kluver to Wolf.
148. 10-7-00 Constitution and Canons for the Government of the Episcopal church in the Diocese of Colorado. (Prev. Sub-Ex. D-4).
149. c.2000 Father Armstrong letter to Carol Kluver. (Prev. Ex. BJ).
150. Father Armstrong Sermon, 2000.
151. Letter dated 2-22-01 from Scheer to Leaman.
152. Letter dated 5-18-01 from Wing to Fouts.
153. Episcopal Grassroots and Clergy Voice Support for Colorado Bishop, Denounce Actions of Breakaway Anglican Group, 6-22-01, Denver (Business Wire).
154. Entity Detail, Grace Church & St. Stephen's, www.sos.state.co.us, 7-12-01.
155. Fax cover sheet and attachment dated 11-9-01 from Van De Boe to Leaman.
156. Fax cover sheet and attachment dated 12- 4-01 from Van De Boe to Leaman.
157. E-mail dated 12-12-01 2:54 p.m. from Leaman to Van De Boe.
158. 7-19-02 Secretary of State Periodic Report. (Prev. Ex. CH).
159. E-mail dated 8-13-02 7:31 p.m. from Bauer to Wing.
160. E-mail dated 10-9-02 4:10 p.m. from Leaman to Toso.
161. Vestry Minutes, 10-10-02.

162. E-mail dated 12-10-02 12:21 p.m. from Peters to gwing@winglaw.com; tkenning@fnbdirect.com; canoeco@msn.com; rleaman@coloradodiocese.org; rlundquist@stgabriels.org; cithompson@aol.com; dougray@attglobal.net; n0pdj@earthlink.net; johnj@gshep.org.

- 163. Fax cover sheet dated 3-21-03 from Leaman to Schaffer.
- 164. Entity Detail, Grace Church & St. Stephen's, www.sos.state.co.us, 5-2-03.
- 165. Letter dated 6-25-03 from Day and Bishop Winterrowd to Johansen.
- 166. 9-10-03 Daniels Chevrolet Purchase Agreement. (Prev. Ex. BK).
- 167. Standing Committee Minutes dated 9-15-03.
- 168. Statutory Bargain and Sale Deed dated 11-1-03.
- 169. E-mail dated 11-19-03 from Theobald to Hitt.
- 170. 11-24-03 Title to Chevrolet Tahoe. (Prev. Ex. BL).
- 171. Letter dated 12-11-03 from Caulfield to Theobald.
- 172. 12-11-03 Caulfield Letter to Theobald. (Prev. Sub-Ex. AA-1).
- 173. E-mail dated 12-12-03 from Theobald to Hutchinson.
- 174. Minutes of The Diocesan Standing Committee Meeting of 1-26-04 Extract.
- 175. Vestry Minutes, 2-27-04.
- 176. Vestry Minutes, 7-27-04.
- 177. Vestry Minutes, 9-14-04. (Prev. Ex. CV).
- 178. E-mail dated 5-25-05 3:04 p.m. from Roger to Wing.
- 179. Meeting notes dated 7-20-05.
- 180. 10-22-05 Letter from Father Armstrong to Alan Crippen.

181. 11-9-05 Memorandum of Understanding Between Grace Church and St. Stephen's Parish and the John Jay Institute for Faith, Society, and Law.
182. Father Armstrong 2006 W-2. (Prev. Ex. BM).
183. Constitution & Canons 2006. (Prev. Sub-Ex. D-3).
184. Vestry Minutes, 5-23-06.
185. Certification signed by Marianna McJimsey, 6-1-06.
186. Vestry Minutes, 7-11-06.
187. 7-18-06 Statement of Grace Episcopal Church Vestry. (Prev. Ex. BN).
188. 8-9-06 Father Armstrong letter to parishioners. (Prev. Ex. BO).
189. 8-14-06 Grace Church & St. Stephen's Episcopal Church Parish Meeting Notes. (Prev. Ex. BP).
190. Vestry Minutes, 9-26-06.
191. Home page of Holy Comforter Church dated 11-9-06.
192. Letter dated 11-9-06 from Lewis to Sisters and Brothers in Christ.
193. E-mail dated 12-8-06 11:29 a.m. Adams to Armstrong and others, including:
 - a. Adams memorandum to the members of the vestry.
194. 12-8-06 Legal Memorandum by Derry Adams. (Prev. Sub-Ex. C-1).
195. Notice of Restrictions on Alienation and Encumbrance dated 12-21-06.
196. E-mail dated 12-18-06 10:24 a.m. Zolner to Schaffer and others.
197. E-mail dated 12-18-06 11:28 a.m. Zolner to "Recipient list suppressed."
198. E-mail dated 12-18-06 11:54 a.m. Zolner to Marbaker and others.
199. E-mail dated 12-18-06 from Zolner to Baker.

200. E-mail dated 12-18-06 4:32 p.m. from Leaman to Bishop O'Neill, Martin, Konieczny, Hitt.
201. E-mail dated 12-20-06 re Gordon Stewart leaving.
202. Letter dated 12-22-06 from Bishop O'Neill to Reeder.
203. E-mail dated 12-23-06 from Konieczny to Lewis, Sanborn, Brownlee, Bishop O'Neill, Thompson, Henderson, Konieczny, Wengrovius, Von der Heiden, Lawthers, Poley, Hughes, Brown, Burns, Martin.
204. E-mail dated 12-23-06 10:03 a.m. from Konieczny to Lewis, Sanborn, Brownlee, Bishop O'Neill, Thompson, Henderson, Konieczny, Wengrovius, Von der Heiden, Lawthers, Poley, Hughes, Brown, Burns, Martin.
205. E-mail dated 12-28-06 4:45 p.m. Adams to Goss and others.
206. E-mail dated 12-29-06 10:22 a..m. Wroblewski to Adams and others.
207. Grace Church & St. Stephen's Vestry Minutes dated 12-30-06 from December 2006-January 2007. (Prev. Sub-Ex. O-1).
208. Letter dated 12-31-06 from Bishop O'Neill to Members of the Grace and St. Stephen's Community.
209. Grace Church & St. Stephen's Vestry Minutes dated 1-2-07 from December 2006-January 2007. (Prev. Sub-Ex. O-1).
210. Pastor investigated for misusing funds, 1-3-07, Paul Asay, The Gazette.
211. Letter dated 1-3-07 from Vestry and Wardens to Parishioners. (Prev. Sub-Ex. C-2).
212. Episcopal cleric in funds probe, 1-4-07, Eric Gorski, The Denver Post.
213. Rector of Episcopal church suspended, 1-4-07, Paul Asay, The Gazette.
214. Colorado Bishop Inhibits Anglican Communion Institute Director, 1-4-07, The Living Church Foundation.

215. AAC Expresses Support for Colorado Priest Temporarily Inhibited by Revisionist Bishop, 1-4-07, American Anglican Council.
216. Church Leader Investigated, 1-4-07, David Nancarrow, KKTV 11 News.
217. Pastor suspended amid accusations of mishandling of church money, 1-5-07, Jeffrey Wolf Producer, 9News.com.
218. COLORADO: Priest inhibited during financial investigation, 1-5-07, Mary Frances Schjonberg, Epsicopal News Service.
219. Colo. Megachurch Pastor Suspended Amid Money Misuse Probe, 1-6-07, The Associated Press.
220. Pastor Investigated in Money Misuse Probe, 1-9-07, Jennifer Morehouse, The Church Report.
221. E-mail dated 1-9-07 3:02 p.m. from Leaman to Bishop O'Neill, Martin, Hitt.
222. Grace Church & St. Stephen's Vestry Minutes dated 1-9-07 from December 2006-January 2007. (Prev. Sub-Ex. O-1).
223. Removal of priest protested, 1-11-07, Jean Torkelson, Rocky Mountain News.
224. 1-11-07 Letter from Daniel J. Sears, Esq. to Right Reverend Robert J. O'Neill.
225. Letter dated 1-12-07 from Cowart and Pendleton to Leaman.
226. E-mail dated 1-19-07 10:54 a.m. Huntley to Fogler and others.
227. Grace Church & St. Stephen's Vestry Minutes dated 1-20-07 from December 2006-January 2007. (Prev. Sub-Ex. O-1).
228. Grace Church & St. Stephen's Vestry Minutes dated 1-21-07 from December 2006-January 2007. (Prev. Sub-Ex. O-1).
229. 1-18-07 Letter from Right Reverend Robert J. O'Neill to Father Armstrong and Daniel Sears, Esq.
230. 1-21-07 Letter of Resignation from Tim Fuller to Marge Goss and Jon Wroblewski. (Prev. Sub-Ex. C-3).

231. Torkelson: Episcopal parish in sad unrest, 1-22-07, Jean Torkelson, Rocky Mountain News.
232. E-mail dated 1-23-07 15:40 p.m. from Konieczny to Wing.
233. Episcopal priest's 'inhibition' riles congregation, 1-26-07, Valerie Richardson, The Washington Times.
234. Letter dated 1-28-07 from Goss to Bishop O'Neill.
235. Grace Church & St. Stephen's 2006 Financial Report/2007 Budget, Annual Parish Meeting, 1-28-07.
236. Frustration simmers at Grace, 1-29-07, Paul Asay, The Gazette.
237. 1-29-07 Father Donald Armstrong's Request for Review by The Diocesan Review Committee Pursuant to Canon IV.1.2(d) Concerning the Issuance of a Temporary Inhibition by the Right Reverend Robert O'Neill on December 27, 2006.
238. E-mail dated 1-29-07 12:27 p.m. from Konieczny to Wing.
239. E-mail dated 1-30-07 5:08 p.m. Spears to Shaffer and others.
240. E-mail dated 2-5-07 1:21 p.m. Spears to Schaffer and others, including:
a. 1974 bylaws.
241. E-mail dated 2-8-07 11:52 a.m. Wroblewski to Newsome and others.
242. E-mail dated 2-10-07 9:09 p.m. Wroblewski to Sherry Brown.
243. Letter dated 2-23-07 Adams to Diocese.
244. E-mail dated 2-27-07 8:53 a.m. Adams to Stampher and others.
245. E-mail dated 2-27-07 9:02 a.m. Huntley to Adams and others.
246. E-mail dated 2-27-07 9:48 a.m. Adams to McJimsey.
247. E-mail dated 2-28-07 3:54 p.m. Adams to Hollister and others.

248. Draft of Father Armstrong's Employment Contract 2007-2010.
249. Letter dated 3-2-07 from Nussbaum to Adams.
250. House of Bishops: Message to God's People, 3-2-07.
251. Statement of Fr. Donald Armstrong III dated 3-3-07 11:30 a.m.
252. E-mail dated 3-5-07 4:08 p.m. Adams to Wroblewski and others, including:
 - a. 3-2-07 Nussbaum letter to Adams.
253. E-mail dated 3-7-07 9:05 a.m. Wroblewski to Newsome and others.
254. E-mail dated 3-7-07 1:59 p.m. Wroblewski to Newsome and others, including:
 - a. Armstrong contract,
 - b. Zolner contract,
 - c. 2-13-07 Vestry minutes,
 - d. 3-8-07 Vestry letter to parishioners, and
 - e. 3-7-07 Vestry meeting agenda.
255. Letter dated 3-8-07 from The Vestry of Grace Church & St. Stephen's Parish to Parishioners of Grace Church.
256. E-mail dated 3-9-07 10:32 a.m. Huntley to Wroblewski and others, including:
 - a. 3-9-07 Vestry letter to parishioners.
257. E-mail dated 3-9-07 11:07 a.m. Adams to Huntley and others.
258. E-mail dated 3-9-07 12:08 p.m. Adams to Wroblewski and others.
259. E-mail dated 3-9-07 3:07 p.m. Huntley to Kline and others, including:
 - a. 3-8-07 vestry letter to parishioners.
260. E-mail dated 3-9-07 4:46 p.m. Balink to Wroblewski and others.
261. E-mail dated 3-9-07 4:50 p.m. Balink to Wroblewski and others.
262. E-mail dated 3-9-07 4:57 p.m. Balink to Kline and others.
263. E-mail dated 3-9-07 6:27 p.m. Adams to Hollister and others, including:
 - a. E-mail dated 3-9-07 Adams to Gee.

264. E-mail dated 3-12-07 11:24 a.m. Adams to Wroblewski and others, including 3-10-07 Nussbaum letter to Adams
265. E-mail dated 3-12-07 7:09 p.m. Adams to Wroblewski and others
266. E-mail dated 3-13-07 8:44 a.m. Adams to McJimsey.
267. Handwritten note with attachment dated 3-13-07 from Watts to Stokes.
268. Report and exhibits dates 3-15-07 from Diocese of Colorado to Vestry.
269. Letter dated 3-16-07 from Adams to Nussbaum. (Prev. Sub-Ex. P-4).
270. Letter dated 3-16-07 Adams to Diocese.
271. E-mail dated 3-16-07 from Nussbaum to Adams.
272. 3-16-07 letter from Derry Adams to Osbourne, Parsons & Rosacker, LLP. (Prev. Sub-Ex. P-5).
273. Authorization for Disclosure of Information. (Prev. Sub-Ex. P-6).
274. 3-16-07 letter from Derry Adams on behalf of the Vestry and Wardens to The Church Insurance Company of Vermont. (Prev. Sub-Ex. P-7).
275. 3-16-07 resignation letter from Derry Adams to Vestry and Wardens (Prev. Sub-Ex. P-8).
276. E-mail dated 3-16-07 5:07 p.m. Adams to Wroblewski and others, including:
 - a. 3-16-07 Adams letter to Nussbaum,
 - b. 3-16-07 Adams letter to Osbourne, Parsons & Rosacker, LLP,
 - c. Authorization and disclosure,
 - d. 3-16-07 Adams letter to Church Insurance,
 - e. 1973 Secretary of State form,
 - f. Recording form, and
 - g. 1974 bylaws.(Prev. Sub-Ex. P-2).
277. E-mail dated 3-17-07 8:55 a.m. from Balink. (Prev. Sub-Ex. P-9).

278. E-mail dated 3-17-07 10:30 a.m. and 10:57 a.m. from Balink to Wroblewski. (Prev. Sub-Ex. P-11).
279. E-mail dated 3-17-07 from Wroblewski to Balink et al.
280. E-mail dated 3-17-07 10:17 a.m. from Jon Wroblewski regarding draft of letter to parishioners. (Prev. Sub-Ex. P-10).
281. E-mail dated 3-19-07 10:52 a.m. Wroblewski to Whitney and others.
282. E-mail dated 3-19-07 11:08 p.m. Wroblewski to Hollister and others.
283. Document from House of Bishops dated 3-20-07 related to the Dar Es Salaam Communique.
284. Letter dated 3-20-07 from Bishop O'Neill to Wroblewski. (Prev. Sub-Ex. P-3).
285. E-mail dated 3-22-07 11:58 a.m. Wroblewski to Whitney and others.
286. E-mail dated 3-23-07 7:53 a.m. Balink to Whitney and others.
287. Transcript of KVOR radio show with O'Donnell and Crippen dated 3-23-07.
288. E-mail dated 3-24-07 11:36 a.m. Stampher to Wroblewski and others.
289. E-mail dated 3-24-07 9:30 p.m. Balink to Whitney and others.
290. E-mail dated 3-24-07 O'Neill to Friese.
291. E-mail dated 3-24-07 10:28 p.m. Stampher to Wroblewski and others, including:
a. 3-26-07 Vestry letter to parishioners.
292. E-mail dated 3-24-07 12:40 p.m. Armstrong to Wroblewski and others.
293. E-mail dated 3-24-07 4:52 p.m. Wroblewski to Vestry, Wardens, and Father Armstrong. (Prev. Sub-Ex. P-13).
294. 3-24-07 email from Bishop O'Neill to Chad Friese. (Prev. Sub-Ex. AD-1).
295. E-mail dated 3-24-07 9:30 p.m. Balink to Whitney and others, including:
a. 3-26-07 Vestry letter to parishioners.

296. E-mail dated 3-25-07 11:55 a.m. Armstrong to Stampher.
297. E-mail dated 3-25-07 2:10 p.m. Wroblewski to Whitney and others.
298. E-mail dated 3-25-07 6:19 p.m. Hollister to Wroblewski and others.
299. Virtue Online's Posting dated 3-25-07 of Secessionist Press Release Regarding 3-26-07 Vote. (Prev. Sub-Ex. C-4).
300. E-mail dated 3-26-07 11:53 a.m. Crippen to Wroblewski and others, including:
- a. 3-26-07 press release,
 - b. 3-26-07 Declaration of Anglican Fidelity, and
 - c. 3-26-07 Vestry letter to parishioners
301. E-mail dated 3-26-07 6:02 p.m. Wroblewski to Whitney and others, including:
- a. Press release, and
 - b. 3-26-07 Vestry letter to parishioners.
302. E-mail dated 3-26-07 6:03 p.m. Wroblewski to Whitney and others.
303. E-mail dated 3-26-07 6:50 p.m. Armstrong to Wroblewski. (Prev. Sub-Ex. P-14).
304. E-mail dated 3-26-07 9:14 p.m. Wroblewski to Whitney and others.
305. E-mail dated 3-26-07 9:15 p.m. Armstrong to Wroblewski.
306. E-mail dated 3-26-07 9:20 p.m. Armstrong to Wroblewski.
307. E-mail dated 3-26-07 9:29 p.m. Stampher to Gloriod and others.
308. Press Release, Largest Episcopal Church in Colorado to Leave Denomination, 3-26-07
309. Largest Episcopal Church in Colorado to Leave Denomination, 3-26-07, Canon Kendall Harmon, titusononline.com.
310. Colorado: Grace Church and St. Stephen's Parish Leaves Denomination Largest Episcopal Church in Colorado to Leave Diocese and TEC, 3-26-07, David W. Virtue, Virtueonline.

311. Leaders of Grace vote to leave Episcopalians, 3-26-07, Brian Newsome, The Gazette.
312. Don Armstrong Says:
<http://titusoneline.classicalenglican.net/?p=18490#comment-1990403#comment>, 3-26-07 at 3:33 p.m.
313. New Grace Episcopal severs ties with national group, 3-26-07 - 2:00 p.m., Brian Newsome, The Gazette.
314. Episcopal parish secedes from Colorado diocese, 3-26-07, Jean Torkelson, Rocky Mountain News.
315. Colorado's largest Episcopal parish leaving U.S. church, 3-26-07, The Associated Press.
316. 3-26-07 Secessionist Vestry minutes. (Prev. Ex. BQ).
317. 3-26-07 Letter from The Rt. Revd. Martyn Minns to John Wroblewski.
318. Church Cuts Ties With Diocese, 3-27-07, Lauri Martin, KKTV 11 News.
319. Parish votes to secede, 3-27-07, Jean Torkelson, Rocky Mountain News.
320. Bishop: Grace Episcopal Can't Leave Diocese, 3-27-07, KRCC 91.5 FM.
321. Colorado Springs Parish Plans to Join CANA, 3-27-07, The Living Church Foundation.
322. Parish panel votes to exit state diocese, 3-27-07, Manny Gonzales, The Denver Post.
323. State's Largest Episcopal Church Abandons National Leadership, 3-27-07, KRCC 91.5 FM.
324. Letter dated 3-27-07 from McJimsey to Wroblewski. (Prev. Sub-Ex. P-15).
325. Letter dated 3-27-07 from Bishop O'Neill to Grace Church and St. Stephen's Parishioner.
326. Draft Letter dated 3-27-07 from Konieczny and Bishop O'Neill to Reeder.

327. Minutes Meeting of the Vestry of Grace Church and St. Stephen's 3-28-07. (Prev. Sub-Ex. P-16).
328. Letter dated 3-28-07 Nussbaum to McCoy.
329. Letter dated 3-28-07 Nussbaum to Ressler.
330. Letter dated 3-28-07 Nussbaum to Davis.
331. Letter dated 3-28-07 Nussbaum to Sullivan.
332. E-mail dated 3-28-07 10:25 p.m. Bradford to Nussbaum.
333. Transcript of KFYO radio show with Armstrong dated 3-28-07.
334. E-mail with attachment dated 3-28-07 9:13 a.m. Bradford to Bishop O'Neill.
335. Colorado Episcopal raises allegations of financial misconduct against breakaway parish leader, 3-28-07, International Herald Tribune.
336. Episcopalians in Colorado Plan to Leave Denomination, 3-28-07, Neela Banerjef, The New York Times.
337. Breakaway parishioners get notice of eviction, 3-28-07, Manny Gonzales, The Denver Post.
338. Showdown on Palm Sunday at parish pulpit, 3-28-07, Jean Torkelson, Rocky Mountain News.
339. UPDATE Diocese accuses Grace's Armstrong of theft, fraud, 3-28-07, The Gazette.
340. Priest a thief, diocese says, 3-28-07, Brian Newsome, The Gazette.
341. Breakaway Episcopalian conservatives draft response to church charges, 3-28-07, International Herald Tribune.
342. Episcopalians Defect to Anglican Church, 3-28-07, My Fox Colorado.com.
343. E-mail dated 3-29-07 8:18 a.m. from Armstrong to Michael O'Donnell.

344. E-mail dated 3-29-07 10:00 a.m. from Armstrong to O'Donnell.
345. UPDATE Diocese tries to Freeze Grace Funds, The Gazette. (Prev. Sub-Ex. P-12).
346. Colo. parish leader facing money charges, 3-29-07, Colleen Slevin, DesMoinesRegister.com.
347. Grace Church Stands Alone, 3-29-07, Jackie Russell, www.coloradocollege.edu.
348. Conflict escalates between diocese, dissident pastor, 3-29-07, Jean Torkelson, Rocky Mountain News.
349. Letter dated 3-29-07 Ressler to Nussbaum.
350. COLORADO: Parish plans Holy Week, Sunday services on Colorado College campus, 3-30-07, www.episcopalchurch.org.
351. Breakaway Episcopal pastor accused of financial misdeeds, 3-30-07, Valerie Richardson, The Washington Times.
352. Grace cash may be frozen; diocese heading to court, 3-30-07, Brian Newsome, The Gazette.
353. Episcopal parish fragments further as two clergy leave, 3-30-07, Jean Torkelson, Rocky Mountain News.
354. Letter, Sears to parishioners (est'd February or March 2007).
355. E-mail dated 3-30-07 11:27 a.m. Nussbaum to Bradford.
356. E-mail dated 3-30-07 5:05 p.m. Kunstle to Norman.
357. Letter dated 3-30-07 Nussbaum to McCoy.
358. Letter dated 3-30-07 Nussbaum to Ressler.
359. Letter dated 3-30-07 Nussbaum to Davis.
360. Letter dated 3-30-07 Nussbaum to Sullivan.

361. Letter dated 3-30-07 from Armstrong to Grace Parishioners.
362. Letter dated 3-30-07 to parishioners.
363. Letter dated 3-31-07 from Nussbaum to Weiskopf.
364. E-mail dated 4-2-07 1:41 p.m. Kunstle to Ressler, including:
a. 3-28-07 Vestry minutes.
365. Episcopal breakaway lays claim to church, 4-2-07, Valerie Richardson, The Washington Times.
366. "Dear Friends?": Fr. Don Armstrong Responds to the Communion Laity and Clergy of Colorado, 4-2-07, www.standfirminfaith.com.
367. Communion Laity and Clergy of Colorado Comment on Diocese of Colorado Allegations, 4-2-07, www.standfirminfaith.com.
368. E-mail dated 4-2-07 1:21 p.m. from Armstrong to DALETBET@aol.com; compclergy@graceandststephens.org; news@clcco.org
369. www.standfirminfaith.com, 4-2-07 9:15 p.m., comments by Armstrong.
370. E-mail dated 4-3-07 10:48 a.m. Kunstle to Norman.
371. Letter dated 4-3-07 Hitt to Ressler.
372. Transcript of KVOR radio show with Armstrong dated 4-3-07.
373. Rector could be investigated, 4-4-07, Jean Torkelson, Rocky Mountain News.
374. Grace under fire, April 5-11, 2007, Michael de Yoanna, The Independent.
375. Letter dated 4-6-07 from Nussbaum to Weiskopf.
376. Letter dated 4-6-07 from Armstrong to Parishioners.
377. Date set for Grace parishioners to vote on vestry's severed ties, 4-7-07, Paul Asay, The Gazette. (Prev. Ex. Q).

378. E-mail dated 4-8-07 12:15 p.m. from Keith W. Stampher to The Communion of Laity and Clergy of The Diocese of the Episcopal Church in Colorado.

379. Letter dated 4-9-07 Johnson to Olney and Walta.

380. Letter dated 4-11-07 from Walta to Nussbaum.

381. McJimsey Vestry Minutes, 4-11-07. (Prev. Sub-Ex. P-17).

382. Letter dated 4-12-07 Kent to Nussbaum, Kunstle and Walta.

383. Letter dated 4-16-07 Kent to Nussbaum and Kunstle.

384. Letter dated 4-16-07 from Walta to Nussbaum.

385. Letter dated 4-16-07 from Nussbaum to Walta.

386. Letter dated 4-16-07 from Nussbaum to Walta.

387. Letter dated 4-18-07 from Bishop O'Neill to Balink. (Prev. Sub-Ex. D-1).

388. Letter dated 4-18-07 from Bishop O'Neill to Barber. (Prev. Sub-Ex. D-1).

389. Letter dated 4-18-07 from Bishop O'Neill to Gloriod. (Prev. Sub-Ex. D-1).

390. Letter dated 4-18-07 from Bishop O'Neill to Hollister. (Prev. Sub-Ex. D-1).

391. Letter dated 4-18-07 from Bishop O'Neill to Huntley. (Prev. Sub-Ex. D-1).

392. Letter dated 4-18-07 from Bishop O'Neill to Kline. (Prev. Sub-Ex. D-1).

393. Letter dated 4-18-07 from Bishop O'Neill to Stampher. (Prev. Sub-Ex. D-1).

394. Letter dated 4-18-07 from Bishop O'Neill to Whitney. (Prev. Sub-Ex. D-1).

395. Letter dated 4-18-07 from Bishop O'Neill to Friese. (Prev. Sub-Ex. D-1).

396. Letter dated 4-18-07 from Bishop O'Neill to Wroblewski. (Prev. Sub-Ex. D-1).

397. Letter dated 4-18-07 from Bishop O'Neill to Schaffer. (Prev. Sub-Ex. D-1).

398. Letter dated 4-18-07 from Bishop O'Neill to Spencer. (Prev. Sub-Ex. D-1).
399. Letter dated 4-20-07 Kunstle to Kent.
400. Armstrong on the blogs, 4-20-07.
401. Odds and ends, 4-22-07, Paul Asay, Faith at Altitude: Gazette Religion Reporter.
402. Episcopal Church in Diocese of FL, Inc. v. Lebnar, 16-2006-CA-002361-XXXX, order granting plaintiff's motion for summary judgment, (Circuit Court, FL, 4-27-07). (Prev. Ex. R).
403. Grace Tidings, May-June, 07
404. 5-8-07 Colorado Secretary of State Annual Report. (Prev. Ex. CQ).
405. Standing Committee Resolution, 5-9-07. (Prev. Sub-Ex. D-2).
406. Letter, 5-9-07 Johnson (IRS) to Grace Episcopal Church.
407. Letter dated 5-10-07 Kunstle to Norman.
408. Diocese wants Grace Church, 5-10-07, Paul Asay, The Gazette.
409. Colo. Episcopal diocese sues to regain breakaway church, 5-11-07, Jean Torkelson, Rocky Mountain News.
410. Episcopal diocese centers battle over parish property, 5-11-07, Jean Torkelson, Rocky Mountain News.
411. Diocese says rector had shredding frenzy, 5-14-07, Jean Torkelson, Rocky Mountain News.
412. COLORADO: Bishop, diocese file property claim, 5-14-07, www.episcopalchurch.org.
413. Don Armstrong Says: 5-15-07.
414. E-mail dated 5-15-07 1:10 p.m. Norman to Kunstle.
415. Letter dated 5-15-07 from Walta to Nussbaum.

416. Letter dated 5-16-07 Kunstle to Hannigan.
417. Letter dated 5-16-07 from Kunstle to Hannigan.
418. Letter dated 5-18-07 from Tawresey to Murphy.
419. Letter dated 5-18-07 from Tawresey to Walta.
420. To the Parishioners of Grace and St. Stephens Concerning the Vote on May 20th to Join CANA, 5-20-07
421. 5-20-26, 2007 Grace Church St. Stephens Election Results. (Prev. Ex. CL).
422. Posting on Titusoneline.com by Emily Kline, 5-21-07
423. Letter dated 5-29-07 Norman to Wroblewski and Kunstle.
424. Diocese of Colorado Responds to Civil Suit, 6-3-07, The Living Church.
425. Armstrong Plea to Reverse Mote on Titus One Nine, 6-19-07. (Prev. Sub-Ex. S-1).
426. Secessionist Congregation's Website Plea to Reverse Mote, 6-20-07. (Prev. Sub-Ex. S-2).
427. Grace Church & St. Stephen's web page 6-20-07.
428. Home page of Grace Church & St. Stephen's dated 6-20-07.
429. 7-10-07 Nussbaum letter to Walta. (Prev. Ex. 3 to Motion to Strike Experts).
430. 7-18-07 Nussbaum letter to Walta. (Prev. Ex. 3 to Motion to Strike Experts).
431. 7-18-07 Father Armstrong letter to IRS. (Prev. Ex. BR.1).
432. 7-19-07 Nussbaum letter to Walta. (Prev. Ex. 3 to Motion to Strike Experts).
433. 7-26-07 Email from Father Armstrong to Harry Zeidens and Howell Sasser.
434. 7-27-07 Email from Harry Zeiders to Father Armstrong.

435. 7-31-07 Reporter's Transcript. (Prev. CN).
436. 8-1-07 Fischer letter to Walta. (Prev. Ex. 4 to Motion to Strike Experts).
437. 8-10-07 Fischer letter to Walta. (Prev. Ex. 1 to Motion to Strike Experts).
438. 8-16-07 IRS letter. (Prev. Ex. BR.2).
439. 8-17-07 Nussbaum letter to Fischer. (Prev. Ex. 3 to Motion to Strike Experts).
440. 8-20-07 Nussbaum letter to Walta. (Prev. Ex. 3 to Motion to Strike Experts).
441. 8-22-07 Nussbaum letter to Fischer. (Prev. Ex. 3 to Motion to Strike Experts).
442. 8-30-07 Affidavit of Dr. Peter Toon. (Prev. Ex. 9 to Motion to Strike Experts).
443. 9-4-07 Affidavit of Lindsay E. Fischer, Esq. (Prev. Ex. 7 to Motion to Strike Experts).
444. 9-4-07 First Affidavit of Mary A. McReynolds. (Prev. Ex. 8 to Motion to Strike Experts).
445. 9-10-07 Affidavit of Alan R. Crippen II. (Prev. Ex. 10 to Motion to Strike Experts).
446. 9-14-07 Letter from Weiskopf to Wells Fargo. (Prev. Ex. CE).
447. 9-20-07 Nussbaum letter to Fischer. (Prev. Ex. BS).
448. 9-21-07 Nussbaum letter to Fischer. (Prev. Ex. 3 to Motion to Strike Experts).
449. 9-21-07 Fischer letter to Nussbaum. (Prev. Ex. 6 to Motion to Strike Experts).
450. 9-25-07 Nussbaum letter to Walta. (Prev. Ex. BT).
451. 10-5-07 Nussbaum letter to Walta. (Prev. Ex. BU).
452. 10-11-07 Walta letter to Nussbaum. (Prev. Ex. BV).

453. 10-18-07 Grace Church and St. Stephen's Articles of Reinstatement. (Prev. Ex. BW).
454. 10-19-07 Secretary of State Certificate of Good Standing for Grace Church and St. Stephen's. (Prev. Ex. BX).
455. 10-19-07 Nussbaum letter to Walta. (Prev. Ex. BY).
456. 11-3-07 Email from Dave Bena to Father Armstrong.
457. 11-5-07 Walta letter to Nussbaum. (Prev. Ex. BZ).
458. 11-6-07 Nussbaum letter to Walta. (Prev. Ex. CA).
459. 11-9-07 Walta letter to Nussbaum. (Prev. Ex. CC).
460. Selected Vestry minutes showing increased Diocesan pledges. (Prev. Ex. CD).
461. 9-14-07 Weiskopf letter to Wells Fargo. (Prev. Ex. CE).
462. 11-6-07 Nussbaum letter to Walta. (Prev. Ex. CA).
463. 11-9-07 Walta letter to Nussbaum. (Prev. Ex. CC).
464. January/February Grace Tidings. (Prev. Ex. CM).
465. 1-21-08 Affidavit of Service. (Prev. Ex. CP).
466. 2-13-08 Grace Church & St. Stephen's Staff Directory. (Prev. Ex. CD.1).
467. 2-13-08 Wright letter to Nussbaum. (Prev. Ex. CO).
468. 3-6-08 Sandoval (IRS) letter to Grace & St. Stephen's Episcopal.
469. 3-12-08 Response by Individual Counterclaim Defendants to Episcopal Entities' Request for Production of Documents. (Prev. Ex. CT).
470. 8-6-08 IRS letter to Grace Church & St. Stephen's.
471. 8-14-08 Armstrong letter to IRS.

472. 9-10-08 Letter from Trena Derricott (IRS) to David Watts.
473. 10-7-08 Bingham (IRS) letter to Grace & St. Stephen's Episcopal Church.
474. 10-14-08 Fischer Memorandum to Messrs. Walta, Wright, Hartley and Weiskopf. (Prev. Ex. 5 to Motion to Strike Experts).
475. March/April, 2008 Grace Tidings. (Prev. Ex. CW).
476. Legal Description of Real Property (Prev. Ex. A).
477. Judgment As Against Third-Party Defendant St. Mark's Parish of Denver, Colorado, a Colorado Non-Profit Corporation.
478. Notice of Vesting of All of the Property of St. Mark's Parish of Denver, Colorado, a Colorado Corporation, in the Bishop and Diocese of Colorado, a Colorado Corporation.
479. Letter undated from Armstrong to Kluver.
480. Undated Application by Father Armstrong to join CANA.
481. Undated Application by Plaintiffs to join CANA.
482. Grace Episcopal and St. Stephen's Parish Carry On Amid Controversy, March/April/May 2007, Colorado Episcopalian.
483. Grace & St Stephens Pledge Contributions.
484. Clerk and Recorder web page for Grace Episcopal Church.
485. Clerk and Recorder web page for Grace Church & St. Stephen's.
486. Parish Directory page.
487. Recorded 808 Roll 240 Page, File Card Made.
488. Largest Colo. Episcopal Parish Leaves U.S. Church, Colleen Slevin, AP Writer.
489. Affidavit of Incorporation of Chapel of Our Saviour Episcopal Church.

490. Episcopal Diocese of Colorado Application for Consent to Encumber Church Property.
491. Episcopal Diocese of Colorado Application for Consent to Alienate Church Property.
492. Purchase and Sale Agreement between Bullock Holdings, LLC and Church of the Holy Comforter of Broomfield.
493. Memo from Leaman to Members of the Standing Committee, Executive Staff, Larry Hitt, George Wing.
494. Title Insurance Commitment.
495. E-mail from Wing.
496. Parish announcement not to vote in secessionists election. (Prev. Sub-Ex. AC-1).
497. Trust documents for Gates, Carpenter, Carlton, Koch, and Smith Trusts. (Prev. Ex. AH).
498. The Episcopal Church Hierarchical Structure. (Prev. Sub-Ex. V-1).
499. The Episcopal Church Hierarchical Judicial Structure for Ecclesiastical Discipline of Bishops. (Prev. Sub-Ex. V-2).
500. The Episcopal Church Hierarchical Judicial Structure for Ecclesiastical Discipline of Priests and Deacons. (Prev. Sub-Ex. V-3).
501. Summary Comparison of Mote and Grace Episcopal Church Facts (Prev. Append. II).
502. Episcopal Church Hierarchy Chart (Prev. Append. III).
503. Episcopal Church Hierarchy Chart -Trial of Bishops (Prev. Append. IV).
504. Episcopal Church Hierarchical Judiciary-Trial of Priests and Deacons (Prev. Append. V).
505. Summary of Property Deeds (Attached to Whitmore expert report).

506. Various photographs of the Property at issue.

St. Phillip & St. James

507. Amended and Restated Articles of Incorporation of The Church of St. Philip and St. James.

St. Andrew's - Ft. Collins

508. Letter dated September 20, 2000 Wiegand, II to Paul.

St. Raphael's

509. Letter dated March 12, 1999 Wing to Robert Wiegand.

Saint Matthias - Monument

510. Letter dated December 31, 1993 Wiegand to Womack.

511. Letter dated December 29, 1993 Womack to Wiegand.

St. Peter the Apostle

512. Draft of Articles of Incorporation.

Chapel of Our Savior

513. Colorado Secretary of State Entity Detail dated July 16, 2001.

514. Colorado Secretary of State Entity History dated July 16, 2001.

515. Letter with attachment dated November 11, 1998 O'Leary to Nimerichter.

516. Letter dated October 27, 1998 Wiegand to Nimerichter.

517. Letter with attachment dated October 26, 1998 Nimerichter to O'Leary.

518. Letter with attachment dated November 23, 1997 O'Leary to Casey.

519. Colorado Secretary of State copy of Affidavit of Incorporation dated May 3, 1966.

520. Letter with attachment dated September 30, 1997 McConnell to Andrews.

St. Thomas

521. Draft "From Mission to Parish" from the Bishop and Diocese of Colorado dated March 10, 1999.

522. Letter dated June 3, 1998 Wiegand to "To Whom It May Concern."

523. Letter dated October 22, 1997 Wiegand to Wilson.

St. David of the Hills

524. E-mail dated January 27, 2006 Caulfield to Paul.

Grand County

525. Letter dated October 25, 2002 unknown author to Wheeler.

St. Alban's

526. Amended and Restated Articles of Incorporation

Christ's - Castle Rock

527. E-mail dated December 17, 2004 Caulfield to Hart.

Transfiguration - Vail

528. Amended and Restated Articles of Incorporation.

St. Luke's

529. Amended and Restated Articles of Incorporation dated February 24, 2002.

530. E-mail dated November 27, 2001 Caulfield to Sellars.

531. Letter dated November 15, 2001 Caulfield to Sellars.

532. Colorado Secretary of State copy of the signature page of Articles of Incorporation

533. Signature page of Articles of Incorporation with Secretary's signature

534. Letter dated February 2, 1996 Wiegand to Dunn.

St. Charles the Martyr

535. E-mail dated November 7, 2003 Caulfield to Sneed.

536. Colorado Secretary of State Entity Detail dated November 5, 2003.

537. E-mail dated November 7, 2003 Caulfield to Sneed.

538. Colorado Secretary of State Entity Detail dated November 5, 2003.

St. Mary Magdalene

539. Articles of Incorporation dated November 20, 2003.

540. "From Mission to Parish" from the Bishop and Diocese of Colorado dated January 12, 1999.

Holy Redeemer - Denver

541. Letter with attachment dated May 16, 2003 from Caulfield to Roane.

St. Michael the Archangel

542. Letter dated December 13, 2002 from Caulfield to Lautenschlager and Greenway.

St. Timothy

543. E-mail dated January 11, 2002 from Caulfield to Baker.

Christ - Aspen

544. E-mail with attachment dated may 20, 2004 from Hutchinson to Myers.

545. Colorado Secretary of State Certificate of Incorporation

546. Letter with attachment dated May 19, 2004 Caulfield Myers.

Good Shepherd

547. E-mail with attachment dated April 30, 2003 6:15 p.m. from Wing to Johanssen, Koerner, Hitt, Kirk, Roach.
548. E-mail dated April 30, 2003 8:07 p.m. from Johanssen to Wing, Koerner, Hitt, Kirk, Roach.
549. E-mail dated May 2, 2003 4:18 p.m. from Caulfield to Hitt, Johanssen, Kirk, Koerner, Roach, Wing.
550. E-mail dated May 5, 2003 7:00 p.m. from Caulfield to Spencer.
551. E-mail dated May 6, 2003 2:48 p.m. from Spencer to Caulfield.
552. E-mail dated May 6, 2003 3:42 p.m. from Caulfield to bspencer@gshep.org; Hitt; Johanssen, Leaman, Wing.
553. E-mail with attachment dated May 6, 2003 4:00 p.m. from Caulfield to bspencer@gshep.org; johnj@gshep.org; LRHitt2@cs.com; rleaman@coloradodiocese.org; Wing.
554. E-mail dated May 7, 2003 11:00 a.m. from Spencer to Caulfield.
555. E-mail dated May 7, 2003 1:11 p.m. from Caulfield to Spencer.
556. E-mail dated May 7, 2003 1:40 p.m. from Caulfield to Secretary of State.
557. E-mail dated May 12, 2003 9:33 a.m. from Caulfield to Spencer.
558. E-mail dated November 11, 2005 from Hutchinson to proden@buyersaccess.com.
559. Letter with attachment dated November 15, 2002 from Caulfield to Johanssen.
560. Fax cover sheet with attachment dated November 21, 2002 from Johanssen to Caulfield.
561. Letter with attachment dated December 5, 2002 from Caulfield to Johanssen and Hitt.
562. Fax cover sheet dated May 2, 2003 from Caulfield to Johanssen.

563. Fax cover sheet with attachment dated May 6, 2003 from Spencer to Caulfield.
564. Fax cover sheet dated May 2, 2003 from Caulfield to Secretary of State.
565. Letter with attachment dated May 16, 2003 from Hutchinson to Office of Colorado Secretary of State.
566. Fax cover sheet with attachment dated May 27, 2003 from Hutchinson to Secretary of State.
567. Letter with attachment dated June 9, 2003 from Hutchinson to Spencer.
568. Letter with attachment dated July 31, 2003 from Caulfield to Spencer.

Epiphany

569. Amended and Restated Articles of Incorporation dated 06-07-03

Church of the Nativity - Grand Junction

570. Letter dated March 5, 1999 from Wiegand to "To Whom It May Concern."
571. Letter dated March 5, 1999 from Wiegand to Sigfoos
572. Memo dated February 5, 1998 from O'Leary to Wiegand.

St. Laurence

573. Letter with attachment dated September 10, 2003 from Caulfield to Mason.

St. Matthew - Grand Junction

574. E-mail dated December 8, 2003 9:30 p.m. from Caulfield to Konieczny.
575. E-mail dated November 4, 2004 from Wing to Konieczny.
576. E-mail dated November 5, 2004 2:21 p.m. from Caulfield to Konieczny and Wing.
577. E-mail dated January 2, 2006 from Konieczny to Caulfield.

- 578. E-mail with attachment dated January 2, 2006 from Konieczny to Caulfield.
- 579. E-mail dated January 8, 2006 from Caulfield to Konieczny.
- 580. Letter dated February 7, 2003 from Caulfield to Konieczny.
- 581. Letter dated December 3, 2003 from Caulfield to Konieczny.

Church of the Ascension - Salida

- 582. Letter dated December 16, 2003 from Caulfield to Maxwell.

Saint Paul's

- 583. Amended and Restated Articles of Incorporation dated February 24, 2005.
- 584. E-mail dated December 1, 2004 from Caulfield to Johnson dated 12-01-04.

Church of the Ascension & Holy Trinity

- 585. Letter dated August 10, 1998 from Wiegand to Robbe.

St. Andrew's - Denver

- 586. Letter dated August 5, 2004 from Caulfield to Bollenbacher.

Saint John's Chrysostom

- 587. Letter dated January 8, 1998 from Wiegand to Anderson.

St. Francis of Assisi - Colorado Springs

- 588. E-mail dated November 3, 2006 from Caulfield to Langenfeld and Hitt.
- 589. E-mail with attachment dated September 20, 2006 from Langenfeld to Hitt.

Christ Church - Canon City

- 590. E-mail dated November 23, 2004 from Caulfield to Kitchell.
- 591. E-mail dated November 22, 2004 from Caulfield to Kitchell and Wing.

St. Andrew's - Cripple Creek

592. Memo dated July 29, 1998 from Janet Toso to All Parishes and Missions.

All Saints - Loveland

593. Letter dated June 12, 1998 from O'Leary to Bunyan.

All Saints - Denver

594. E-mail dated February 25, 2003 12:48 p.m. from Caulfield to Brown.

595. E-mail dated June 16, 2003 12:24 p.m. from Brown to Hutchinson.

596. E-mail dated August 24, 2005 1:44 p.m. from Caulfield to Brown.

597. E-mail dated August 25, 2005 6:40 p.m. from Caulfield to Brown.

598. E-mail dated May 24, 2007 from Brown to Caulfield.

599. Letter dated November 18, 2002 from Caulfield to Horle.

600. Letter dated June 15, 2007 from Caulfield to Brown.

601. Letter undated from Horle to All Saints Episcopal Church and Caulfield (sic).

602. Amended and Restated Articles of Incorporation dated 12-03-03

Calvary - Golden

603. Amended and Restated Articles of Incorporation dated September 30, 2001.

604. Amended and Restated Articles of Incorporation dated September 30, 2001.

605. Letter dated October 15, 2001 from Caulfield to Wengrovius.

606. Letter dated March 26, 1996 from Wiegand to Murray.

Church of the Holy Comforter, Broomfield

- 607. Letter dated December 22, 2006 Bishop O'Neill to Reeder
- 608. Letter dated June 24, 1971 Father Hewitt to Right Reverend Thayer
- 609. Email dated January 29, 2007 Rev. Konieczny to Wing.
- 610. Email dated January 23, 2007 Rev. Konieczny to Wing.
- 611. Email dated December 23, 2007 Rev. Konieczny to Standing Committee and Alienation and Encumbrance Committee and others.
- 612. Email dated December 23, 2007 from Rev. Konieczny to Standing Committee and Alienation and Encumbrance Committee and others.
- 613. Articles of Incorporation dated December 1973.
- 614. "What we Believe" from Holy Comforter Church's Website.
- 615. Undated Email from Lewis to parish.
- 616. Purchase and Sale Agreement undated.
- 617. Notice of Restrictions on Alienation and Encumbrance dated December 2006.
- 618. Letter Dated March 27, 2007 from Rev. Konieczny and Bishop O'Neill to Fr. Redder.

St. John's

- 619. Amended and Restated Articles of Incorporation, St. John's Church in the Wilderness.
- 620. September 15, 2003 Standing Committee Minutes.
- 621. 1981 Articles of Incorporation,. St. John's Church in the Wilderness.

Christ Church of Aspen

- 622. Letter Dated May 18, 2001 from Wing to Rev. Fouts
- 623. Letter Dated February 22, 2001 from Scheen to Lehman

Church of the Transfiguration

624. January 26, 2004 Extract of the Minutes of the Diocesan Standing Committee.

Christ Church, Castle Rock

625. Email dated May 25, 2005 from Roger to Wing.

626. Email, undated, from Fr. Meyers to Wing.

627. Email dated May 24, 2005 from Fosdick to Wing and others.

628. Email dated May 24, 2005 from Wing to Fosdick and others.

Trinity, Kremming

629. Email dated August 13, 2002 from Bauer to Wing.

St. Paul's Episcopal Church

630. Letter dated May 8, 2000 from Kluver to Wolf

631. Application for Consent to Alienate and Encumber Property, Revised August 1996.

632. Application for Consent to Alienate and Encumber Property, Revised August 2004.

633. Application for Consent to Alienate and Encumber Church Property, Revised March 2002.

Church of the Good Shepherd

634. Articles of Incorporation Dated January 1982.

635. Change of Registered Office and/or Registered Agent dated January 1984.

636. Biennial Report dated March 1994.

637. Biennial Report dated March 1996.

- 638. Biennial Report dated March 1998.
- 639. Rejected Biennial Report dated April 1998.
- 640. Statutory Bargain and Sale Deed dated November 18, 2003.
- 641. Letter dated June 25, 2003 from Day and Bishop Winterrowd to Father Johanssen.

Church of the Intercession

- 642. Email dated December 10, 2002 from Rev. Peters to Wing and others.

Church for All Nations

- 643. Email, undated from Leaman to Standing Committee and others.
- 644. Email dated January 9, 2007 from Leaman to Bishop O'Neill and others.
- 645. Email dated December 18, 2006 from Leaman to Bishop O'Neill and others.
- 646. Letter dated January 12, 2007 from Cowart and Pendleton to Leaman.

Church of the Holy Spirit

- 647. Letter dated February 23, 1999 from O'Leary to Rev. Day.
- 648. Letter dated June 8, 1998 from O'Leary to Rev. Day.
- 649. Stewart Title Insurance Commitment dated July 2006.
- 650. Email, undated from George Wing Alienation and Encumbrance Committee.

Other

- 651. All documents produced by Father Crippen in response to a discovery request.
- 652. All documents related to communications, applications, and other documents exchanged between Father Armstrong, Father Crippen, Father Zolner, and others affiliated with the CANA congregation and representatives of CANA.
- 653. All exhibits attached to Episcopal Church Side's expert reports.

654. Various summary exhibits provided in accordance with the trial management order.
655. The Constitution and Canons of the Church of Nigeria (Anglican).
656. The Constitution, Canons, other organizing documents, and publications of the Anglican Church of North America.
657. The revised bylaws and amended articles, if any, of the plaintiff.
658. The Constitution, Canons, other organizing documents, and publications of CANA.
659. Various photographs of the disputed property.
660. Any pleading, motion, brief, discovery response, or other document filed in the court record or served in this case.

Damages

C. Pursuant to the Court's September 5, 2008 Order, Defendants and Third Party Plaintiffs are not disclosing damage calculations at this time.

Insurance

D. Not applicable.

Respectfully submitted,

ROTHGERBER JOHNSON & LYONS LLP

/s/ _____

L. Martin Nussbaum Atty. Reg. # 15370

Attorneys for Episcopal Church Parties

CERTIFICATE OF SERVICE

On December 1, 2008, I served, via LexisNexis File & Serve, a copy of the foregoing to:

J. Gregory Walta
J. Gregory Walta, P.C.
105 E. Moreno Avenue, Suite 101
Colorado Springs, CO 80903

Bruce M. Wright
Flynn, Wright & Fredman LLC
111 South Tejon Street, Suite 202
Colorado Springs, CO 80903-2246

Dennis W. Hartley
Law Office of Dennis W. Hartley, P.C.
1749 S. Eighth Street, Suite 5
Colorado Springs, CO 80906

Brent E. Rychener
Holme Roberts & Owen LLP
90 South Cascade Avenue, Suite 1300
Colorado Springs, CO 80903

Geri O'Brien Williams
Douglas Dent
Dworkin, Chambers, Williams, York, Benson
& Evans, P.C.
3900 E. Mexico Avenue, Suite 1300
Denver, CO 80210

On December 1, 2008, I mailed a copy of the foregoing to:

Chad Friese, Junior Warden
Grace Church & St. Stephen's,
a Colorado unincorporated nonprofit association
c/o Argent Company
511 N. Tejon, Suite 100
Colorado Springs, CO 80903

Adam Chud
Goodwin Procter
901 New York Avenue NW
Washington, D.C. 20001

/s/ Karen Lutterschmidt
Karen Lutterschmidt

