CHRISTOPHER HOLLEMAN, ESQ. 1424 C NORTH 12TH STREET ARLINGTON, VA 22209 OFFICE: (202) 401-8200

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October 16, 2008

Chair of the Ecclesiastical Trial Court The Diocese of Virginia 110 West Franklin Street Richmond, VA 23220-5095

Gentlemen:

Enclosed please find for filing the response of the Rev. Randolph M. Bragg to the Presentment against him by the Diocesan Review Committee.

Sincerely, Wolfern

CHRISTOPHER HOLLEMAN

cc: R. Scott Caulkins, Esq.

BEFORE THE ECCLESIASTICAL TRIAL COURT OF THE DIOCESE OF VIRGINIA

In the Matter of:

The Rev. Randolph Merritt Bragg, Respondent

RESPONDENT'S REPLY TO PRESENTMENT TOGEHER WITH MOTION TO DISMISS

Now Comes the Reverend Randolph Merritt Bragg, and responds to the presentment from the Diocesan Review Committee of The Episcopal Church's Diocese of Virginia, dated September 19, 2008, under Canon IV.4.16(c)

Count I

- 1.) Admitted.
- 2.) Respondent is without sufficient information to admit or deny this count, and therefore puts the Diocese to its proof.
- 3.) Denied as to each and every allegation in this statement. No such incident ever occurred.
- 4.) Denied as to each and every allegation in this statement. No such incident ever occurred.

Count II

- 1.) Admitted.
- 2.) Respondent is without sufficient information to admit or deny this count, and therefore puts the Diocese to its proof.
- 3.) Denied as to each and every allegation in this statement. No such incident ever occurred.
- 4.) Denied as to each and every allegation in this statement. No such incident ever occurred.

Count III

- 1.) Admitted.
- 2.) Respondent is without sufficient information to admit or deny this count, and therefore puts the Diocese to its proof.
- 3.) Denied as to each and every allegation in this statement. No such incident ever occurred.
- 4.) Denied as to each and every allegation in this statement. No such incident ever occurred.

- Motion to Dismiss -

Respondent further moves to DISMISS this action. Respondent has been received as a priest into the Convocation of Anglicans in North America (CANA) and is no longer a priest of the Episcopal Church. Respondent is now serving as a priest of CANA. The letter from Bishop Martin Minns formally receiving Respondent into CANA as a priest was provided to the Church Attorney, and a copy is herewith attached. This Court cannot render any meaningful judgment, as Respondent is no longer a member of The Episcopal Church and his orders are now beyond The Episcopal Church's power to inhibit or depose. The Presiding Bishop has stated that individuals may leave The Episcopal Church, and Respondent has done so.

Accordingly, Respondent moves that this Court dismiss the presentment. Respondent further respectfully requests that the Court rule on this motion before further proceedings take place, as a matter of judicial economy.

Respectfully submitted,

FOR: The Rev. Randolph Merritt Bragg

South Millann

BY:

Christopher Holleman 1424 C North 12th Street

Arlington, VA 22209

Office: (202) 401-8222

Massachusetts Bar No. 238340



Approval of Canonical Residence and License as Priest in CANA

July 31, 2008

The Rev. Randolph Merritt Bragg 2406 Apple Hill Road Alexandria, Virginia 22308

Dear Mr. Bragg,

Greetings in Christ! I am pleased to inform you that the conditions of your earlier conditional approval have been satisfied and that you have been received as a priest with the full rights and responsibilities of canonical residence and license to minister under the sole jurisdiction and oversight of the Convocation of Anglicans in North America (CANA). Welcome to your new home in CANA with an authentic connection to the Anglican Communion. Your decision is a remarkable testimony to your desire to be true to your call as a faithful Christian pastor within the Anglican tradition. A formal certificate will be provided to you shortly.

I am delighted that we will be walking together into an exciting future. A verse from Scripture that has meant a great deal to my wife Angela and me is from Paul's letter to the Christians in Corinth—who were going through serious challenges: "No eye has seen, no ear has heard, no mind has conceived what God has prepared for those who love him" (1 Corinthians 2:9). This is a promise for all of us . . . the precise shape of the future may be uncertain but one thing we do know is that the God who has led us to this point will continue to show us the way to an even more exciting future.

May God richly bless your commitment to uphold and advance the historic Christian faith, doctrine, sacrament, and discipline of the one holy, catholic, and apostolic church. I pray that we will look to the future, confident that God's love will continue to sustain and guard us. "For I am convinced that neither death nor life, neither angels nor demons, neither the present nor the future, nor any powers, neither height nor depth, nor anything else in all creation, will be able to separate us from the love of God that is in Christ Jesus our Lord" (Romans 8:38-39).

Your brother in Christ,

The Rt. Rev'd Martyn Minns Missionary Bishop of CANA

CONVOCATION OF ANGLICANS IN NORTH AMERICA

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