

IN IN THE DIOCESE OF VIRGINIA
THE MATTER OF
THE REV'D DR. B. CAYCE RAMEY, RESPONDENT

Motion to Redact Exhibit A to Church Attorney's Motion for Sanctions

Respondent, the Rev'd Dr. B. Cayce Ramey, by counsel, hereby moves the Hearing Panel to redact Exhibit A to the Church Attorney's Motion for Sanctions as set out in Exhibit 1 attached to this motion.

The grounds for this motion are as follows:

The Motion for Sanctions was filed on November 6, 2023, and was posted on the Diocesan website shortly thereafter. The URL for Exhibit A is as follows:
(<https://www.episcopalvirginia.org/resources/administration/ecclesiastical-discipline/title-iv-hearing-panel-proceedings/>)

Exhibit A consists of three separate emails of August 15, September 23, and October 31. The August 15 email pertained to thanking the addressees for their support, discussing the Statement of Offenses and a possible Accord, and discovery matters. The October 31 email addressed Respondent's frustration at not being seated at Convention, his deposition by the Church Attorney and scheduling issues. Only the September 23 email contained any language to which the Church Attorney objected and on which he filed the Motion for Sanctions.

Respondent moves that Exhibit A be redacted to remove in their entirety the August 15 and the October 31 communications and to retain, in its entirety, the September 23 communication. A proposed redaction is attached to this Motion as Exhibit 1.

While the unredacted version of Exhibit A has been on the website for some time, Respondent believes that, in its current form, Exhibit A should not be part of the record in this matter since the portions Respondent proposes to have redacted are not relevant or pertinent to any issue before the Hearing Panel.

Respondent asks that the Hearing Panel grant this motion.

Respectfully submitted,

/s/Jack W. Burtch, Jr.
Counsel to Respondent

Date: December 13, 2023

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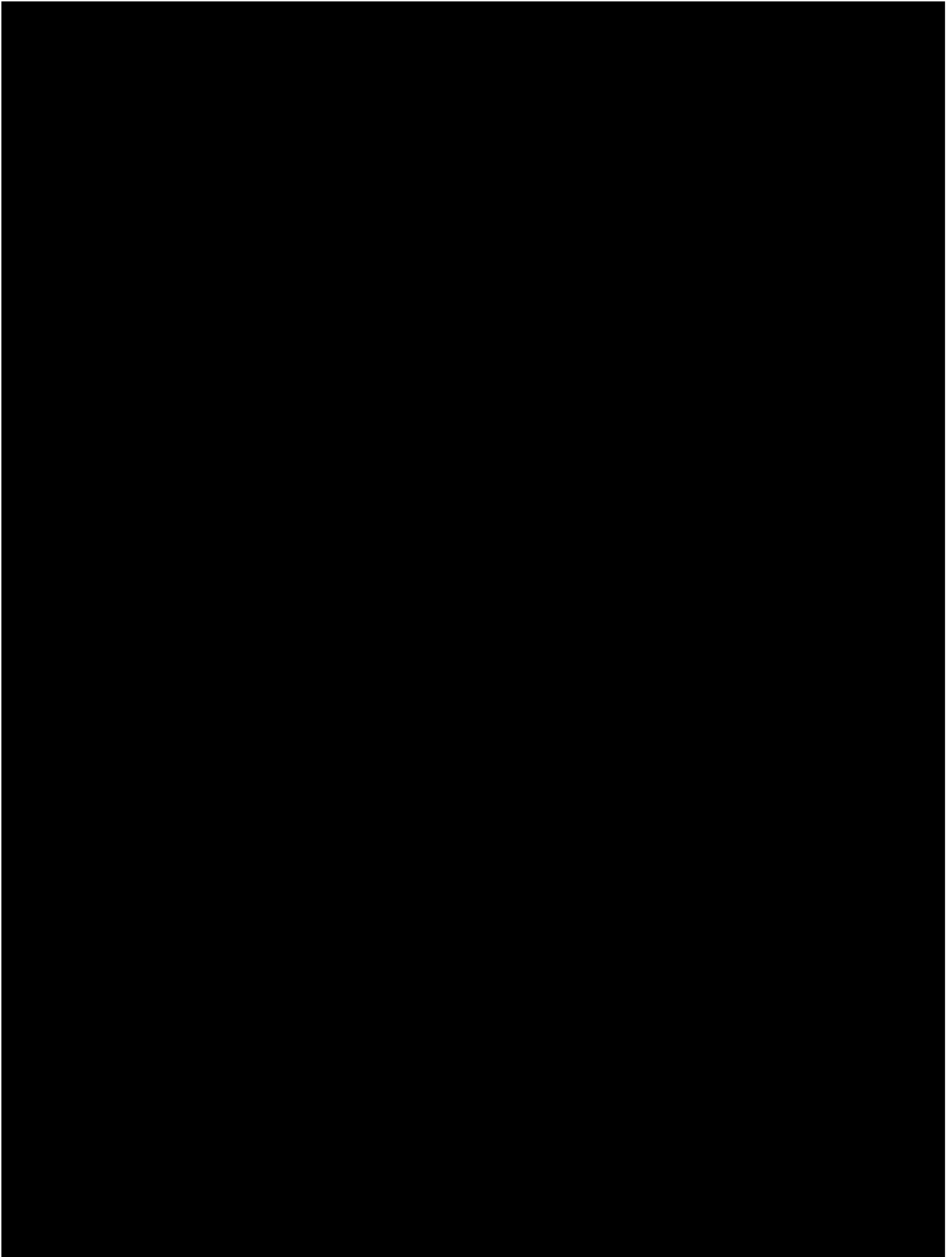
I certify that a copy of this Response to the Church Attorney's Motion for Sanctions has been provided by email to Mr. Brian Carr, Thomas Hahn, Esquire, The Rt. Rev'd E. Mark Stevenson, J.P. Causey, Esquire, Bradfute W. Davenport, Esquire, The Rt. Rev'd Susan E. Goff, The Rev'd Edward O. Miller, Jr. and The Rev'd Cayce Ramey.

/s/Jack W. Burtch, Jr.

Date: December 13, 2023

Exhibit 1

EXHIBIT A TO CHURCH ATTORNEY'S MOTION FOR SANCTIONS





On Sat, Sep 23, 2023 at 3:25 PM Cayce Ramey <fightingfriar@gmail.com> wrote:
Dear Friends & Colleagues,

Blessings to you as the Summer ends and Fall begins in earnest. You continue to be a blessing to me and my family as I see this ever-growing list of people willing to offer their love and compassion in the midst of this fraught time for us.

Because of the breadth of your support, it now seems reasonable to send some periodic updates to a blind-carbon-copy email list rather than to try and keep up with all of the

details with each one of you individually. I still value highly our individual interactions and want and plan to continue interacting with each of you one-on-one. This bulk email, hopefully, will keep folks updated in between the calls and coffees and txts.

The Title IV process grinds slowly on. We have set tentative hearing dates for Dec 12-15, though I suspect those will change to accommodate witness availability, etc. The diocesan attorney and my attorney have exchanged questions and answers based on our mutual review of the documents shared during "discovery".

On the off chance your name appeared in some email somewhere in the past few years and so you get contacted by the Diocesan attorney, Brad Davenport, please know you are under no obligation to speak with him or to not speak with him either way. If he does call you, I would appreciate knowing. Very few if any of you should get contacted.

The next step is formal depositions. I'll get asked questions by the church attorney with a court reporter present and then the transcript can be referenced during the hearing. Right now this is scheduled for Oct 4 in Richmond.

Otherwise, the ups and downs continue. Some days, confident and at peace. Other days hurt and saddened. Still far more peaceful days than sad and hurt days. And lots of days mixed and in-between.

I plan on being at the Diocese of Virginia Convention in November, so for those of you attending, I hope we get to connect in person.

I've included my Aug update below, as I've added a few folks to the list.

Thank you for all the prayers (and the prayers yet to come). If you'd like to chat more or hear more details, just let me know. If you'd like to not receive another one of these types of emails or if you didn't even want to receive this one, I apologize for my error. I will be happy to remove you from the list. Please just let me know.

Thank you again for your care and support.

Peace,
Cayce



