

THE EPISCOPAL CHURCH, et al.	§	IN THE DISTRICT COURT
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
FRANKLIN SALAZAR, et al.	§	141 <sup>ST</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF CHAD BATES**

On this day personally appeared before me C. Chad Bates, who, after being placed under oath, stated the following:

- (1) "My name is Christopher Chad Bates. I certify that I am over the age of 18 years, that I never have been convicted of any felony or misdemeanor involving moral turpitude, and that I am fully competent to make this Affidavit.
- (2) From 1999 through the present, I have served as a Trustee of the Corporation of the Episcopal Diocese of Fort Worth ("the Corporation"). As a Trustee, I have had extensive personal involvement in connection with the properties owned by the Corporation, as well as those properties titled in various parishes, missions, and other organizations affiliated with the Episcopal Diocese of Fort Worth ("the Diocese"). I have negotiated numerous mineral leases for these properties, and have become familiar with the instruments of title pertaining to them. Moreover, I personally and others under my supervision have conducted research and obtained certified copies of title instruments and deeds pertaining to the properties from local authorities in all counties where these properties are situated. As a consequence of all of the foregoing, I have personal knowledge of the facts recited herein, and those facts are true and correct.
- (3) Attached to this Affidavit as Exhibits A, B and C are lists of documents previously included in a Joint Appendix and stipulated by the parties in this lawsuit as being true and correct copies of instruments of title, including deeds,

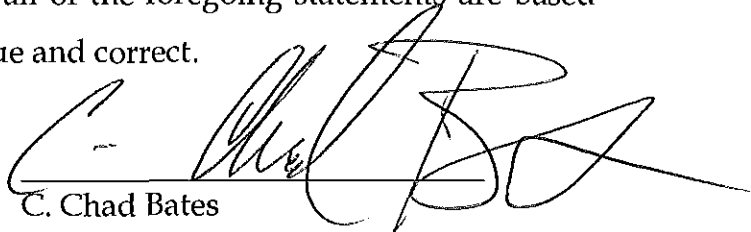
pertaining to the real property situated within the Episcopal Diocese of Fort Worth.

- (4) Exhibit A is a list of instruments of title, including deeds, conveyed to the several bishops of the Episcopal Diocese of Dallas that were the subject of the Declaratory Judgment dated August 15, 1984 by the 95th District Court of Dallas County, Texas, in cause number 84-8673, styled "The Episcopal Diocese of Dallas, et al v. Jim Mattox, Attorney General of Texas." Specifically, all of these properties as of December 31, 1982 stood in the name of the Episcopal Diocese of Dallas or in the name of one of its Bishops as Bishop of Dallas, and all are physically located in the counties of Archer, Bosque, Brown, Clay, Comanche, Cooke, Eastland, Erath, Hamilton, Hill, Hood, Jack, Johnson, Mills, Montague, Palo Pinto, Parker, Somervell, Stephens, Tarrant, Wichita, Wise, and Young, State of Texas. The intended and actual effect of the Declaratory Judgment was to transfer all such real property within the former Diocese of Dallas to the Corporation of the Episcopal Diocese of Fort Worth. The actual effect of the Declaratory Judgment is evidenced by the several subsequent transfers of certain of the properties by the Corporation to third parties.
- (5) As a long-time trustee of the Corporation, I have personal knowledge that the Board of Trustees, acting on behalf of the Corporation, has held and managed the real property made the subject of the 1984 Declaratory Judgment, referenced above, in fee simple, free of any encumbrance or burden save and except valid liens created by any deeds of trust that may have been granted and the beneficial interest of those congregations and those institutions and entities affiliated with the Diocese that are in possession and making use of the property, pursuant to Canon 18 and Article 14 of the Diocese's Constitution, which specifically provide that all property within the Diocese shall be held by the Corporation in trust for the use and benefit of those parishes, missions and other diocesan institutions, and which further provide that all property situated within the Diocese is being

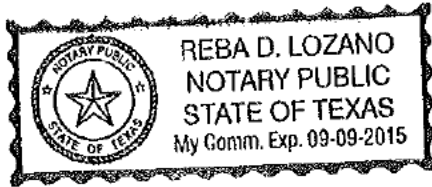
held with no adverse claim of any beneficial interest by any other person or entity, including The Episcopal Church of the United States of America, and that any such claimed beneficial interest is expressly denied. Based on my knowledge of the records of the Corporation, together with my service as a trustee of the Corporation, I have personal knowledge that the Corporation has, during the almost 32 years of its existence, held and managed all property of the Corporation without regard to any alleged beneficial trust interest by The Episcopal Church of the United States of America.

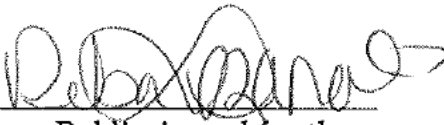
- (6) Exhibit B is a list of title instruments, including deeds, whereby title was vested in an individual parish, mission, or other diocesan institution before the 1984 Declaratory Judgment (except where noted on Exhibit B), and no subsequent conveyance was made by the individual parish, mission, or diocesan institution to the Corporation. Nevertheless, as noted above, control of all property acquired for use in the Diocese is vested in the Corporation by Canon 18 and Article 14 of the Diocese's Constitution and Canons. Accordingly, the trustees of the Corporation consider all such property, whether specifically titled in the Corporation or not, as property owned and controlled by the Corporation.
- (7) Exhibit C is a list of title instruments, including deeds, whereby title was conveyed directly in the Corporation after the 1984 Declaratory Judgment.

I swear under penalty of perjury that all of the foregoing statements are based upon my own personal knowledge and are true and correct.

  
C. Chad Bates

SUBSCRIBED AND SWORN TO BEFORE ME by the said C. Chad Bates on  
this 26 day of November, 2014.



  
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Notary Public, in and for the  
State of Texas

Cause No. 141-252083-11

THE EPISCOPAL CHURCH, ET AL	§	IN THE DISTRICT COURT
	§	
Plaintiffs	§	
	§	
VS.	§	TARRANT COUNTY, TEXAS
	§	
FRANKLIN SALAZAR, ET AL	§	
	§	
Defendants	§	141 <sup>ST</sup> JUDICIAL DISTRICT

**EXHIBIT A TO AFFIDAVIT OF CHRISTOPHER CHAD BATES**

<b>Description</b>	<b>Joint Appendix Numbers</b>
All Saints’ Wichita Falls	JA00873–JA00877
Good Shepherd Wichita Falls	JA00887–JA00902
St. Andrew’s Breckenridge	JA00903–JA00910
St. Andrew’s Grand Prairie	JA00950–JA00956
St. Luke’s Mineral Wells	JA00988–JA00993
St. Patrick’s Bowie	JA00994–JA01001
St. Paul’s Gainesville	JA01018–JA01024
St. Stephen’s Wichita Falls	JA01037–JA01046
Trinity Henrietta	JA01069–JA01073
All Saints’ Weatherford	JA01074–JA01075
St. Luke’s Mineral Wells	JA01076–JA01078
All Saints’ Fort Worth	JA01099–JA01105
All Saints’ Fort Worth	JA01112–JA01120
Unknown Parish Affiliation	JA01146–JA01148
Good Shepherd Granbury	JA01202–JA01208
Holy Comforter Cleburne	JA01216–JA01220
Holy Comforter Cleburne	JA01221–JA01231
Holy Spirit Graham	JA01232–JA01236
Holy Spirit Graham	JA01237–JA01243
Holy Trinity Eastland	JA01244–JA01249

<b>Description</b>	<b>Joint Appendix Numbers</b>
St. Andrew's Breckenridge	JA01278–JA01287
St. Christopher's Fort Worth	JA01458–JA01463
St. Andrew's Grand Prairie	JA01552–JA01566
St. Gregory's Mansfield	JA01574–JA01580
St. John's Brownwood	JA01581–JA01590
St. John's Burkburnett	JA01597–JA01601
St. John's Burkburnett	JA01602–JA01606
Christ the King Fort Worth	JA01665–JA01669
St. Mary's Hamilton	JA01670–JA01676
St. Mary's Hillsboro	JA01677–JA01686
Ascension & St. Mark, Wise County	JA01710–JA01714
Ascension & St. Mark, Wise County	JA01715–JA01717
Ascension & St. Mark, Wise County	JA01720–JA01721
Ascension & St. Mark, Wise County	JA01726–JA01731
All Saints' Wichita Falls	JA01736–JA01740
Camp Crucis	JA01750–JA01764
Camp Crucis	JA01765–JA01779
Good Shepherd Wichita Falls	JA01870–JA01876
St. Alban's Hubbard	JA01891–JA01897
St. Alban's Arlington	JA01898–JA01918
St. Andrew's Breckenridge	JA01987–JA01995
St. Andrew's Fort Worth	JA02026–JA02041
St. Andrew's Fort Worth	JA02033–JA02040
St. Andrew's Fort Worth	JA02042–JA02044
St. Anne's Fort Worth	JA02104–JA02111
St. Elizabeth's Fort Worth	JA02112–JA02117
St. John's Fort Worth	JA02123–JA02124
St. John's Fort Worth	JA02125–JA02127
St. Luke's Mineral Wells	JA02201–JA02210
St. Luke in the Meadow Fort Worth	JA02250–JA02256
St. Mark's Arlington	JA02280–JA02284

<b>Description</b>	<b>Joint Appendix Numbers</b>
St. Michael's Richland Hills	JA02322–JA02326
St. Peter & St. Paul Arlington	JA02327–JA02331
St. Simon's Fort Worth	JA02341–JA02354
St. Simon's Fort Worth	JA02355–JA02361
St. Stephen's Wichita Falls	JA02362–JA02372
St. Timothy's Fort Worth	JA02380–JA02407
St. Vincent's Bedford	JA02408–JA02415
Holy Apostles Fort Worth	JA02474–JA02476
Good Shepherd Brownwood	JA02481–JA02485
St. Luke's Weatherford	JA02489–JA02490
St. Luke's Weatherford	JA02499–JA02502
St. Paul's Gainesville	JA02503–JA02507

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Defendants	§	141 <sup>ST</sup> JUDICIAL DISTRICT

**EXHIBIT B TO AFFIDAVIT OF CHRISTOPHER CHAD BATES**

<b>Description</b>	<b>Joint Appendix Numbers</b>
St. Andrew’s Breckenridge	JA00917–JA00921
All Saints’ Fort Worth	JA01079–JA01098
St. Andrew’s Breckenridge	JA01261–JA01271
St. Andrew’s Fort Worth	JA01298–JA01313
St. Andrew’s Permanent Fund, Fort Worth	JA01314–JA01319
St. Andrew’s Fort Worth - Post Declaratory Judgment	JA01317–JA01319
St. Andrew’s Fort Worth	JA01732–JA01733
All Saints’ Weatherford	JA01865–JA01869
St. Alban’s School Arlington	JA01963–JA01986
All Saints’ School Fort Worth	JA01996–JA02007
St. Andrew’s Fort Worth	JA02026–JA02027
St. Andrew’s Fort Worth	JA02039–JA02040
St. Andrew’s Fort Worth	JA02045–JA02046
St. Andrew’s Fort Worth	JA02049–JA02103
St. John’s Fort Worth	JA02118–JA02154
St. Timothy’s Fort Worth	JA02405–JA02407



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FRANKLIN SALAZAR, ET AL	§	
	§	
Defendants	§	141 <sup>ST</sup> JUDICIAL DISTRICT

**EXHIBIT C TO AFFIDAVIT OF CHRISTOPHER CHAD BATES**

<b>Description</b>	<b>Joint Appendix Numbers</b>
St. John’s Fort Worth	
Ascension & St. Mark, Wise County	JA00878–JA00886
St. Andrew’s Breckenridge	JA00911–JA00916
St. Andrew’s Grand Prairie	JA00922–JA00928
St. Andrew’s Grand Prairie	JA00929–JA00949
St. Joseph’s Grand Prairie	JA00957–JA00981
St. Luke’s Mineral Wells	JA00982–JA00987
St. Paul’s Gainesville	JA01002–JA01017
St. Luke’s Mineral Wells	JA01025–JA01036
St. Thomas Jacksboro	JA01047–JA01068
All Saints’ Fort Worth	JA01106–JA01111
All Saints’ Weatherford	JA01121–JA01142
Good Shepherd Granbury	JA01186–JA01201
Our Lady of the Lake, Laguna Park	JA01250–JA01260
St. Andrew’s Breckenridge	JA01272–JA01277
St. Andrew’s Grand Prairie	JA01388–JA01416
St. Anthony’s Alvarado	JA01432–JA01448
St. Barnabas Fort Worth	JA01449–JA01457
St. Francis Willow Park	JA01464–JA01470
Trinity Dublin	JA01471–JA01476

<b>Description</b>	<b>Joint Appendix Numbers</b>
Holy Apostles Fort Worth	JA01485–JA01492
Iglesia San Juan Fort Worth	JA01493–JA01499
Iglesia San Miguel Fort Worth	JA01500–JA01551
St. Francis Willow Park	JA01567–JA01573
St. John’s Brownwood	JA01591–JA01596
Holy Apostles Fort Worth	JA01635–JA01642
St. Mary’s Hillsboro	JA01685–JA01686
St. Matthew’s Comanche	JA01687–JA01706
Ascension & St. Mark, Wise County	JA01741–JA01749
Diocesan Center for Ministry	JA01838–JA01864
St. Alban’s Arlington	JA01919–JA01962
St. Andrew’s Fort Worth	JA02047–JA02048
St. John’s Fort Worth	JA02138–JA02143
St. John’s Fort Worth	JA02146–JA02154
St. Laurence Southlake	JA02183–JA02200
St. Luke in the Meadow	JA02257–JA02279
St. Philip’s Arlington	JA02332–JA02340
St. Stephen’s Hurst	JA02373–JA02379
St. Luke’s Mineral Wells	JA02491–JA02498