



**denomination?** Note how the individual worshipping decisions of any person with a First Amendment right is not implicated in that question at all. The church doors remain open (to people going in *or out*), and any person is free to exercise their chosen faith elsewhere. Any person or persons can worship as they please . . . they just can't use property that has a different charitable purpose to do so.

A person has a right to practice his or her faith just like any person has a constitutionally protected right to travel freely about the country. They just can't use someone else's car to do so. FPC stands before the Court, holding the keys to a car dedicated to the limited purpose of PC(USA), and says "we can freely travel to ECO" as its argument for being able to take the car donated for the charitable purpose of PC(USA). It argues the wrong point, and answers the wrong question. Any and all of the members of FPC, individually or collectively, are free to "travel to ECO." What they cannot do is take property that is dedicated to another purpose with them.

FPC invoked this Court's jurisdiction to determine what can/can't be done with the church's property. And by its hasty action to pack up that property and use it for a purpose other than the express charitable purpose for which it was donated, FPC has now made this Court's exercise of that jurisdiction necessary.

Intervenors have attached their proposed Temporary Injunction Order again, for the Court's convenience. The Intervenors ask that this Court sign that Order to protect the Intervenors' interest in property that they have helped build over the years with thousands of dollars of donations. The ruling cabal of FPC doesn't just want to travel to ECO; they want to take every single piece of the church's property with them.

They can't do that.

The property can only be used for its charitable purpose, determined at the time of donation. Any other use is denying the property from use for its intended purpose, and is exactly the imminent and irreparable harm that this Court can—and should—prevent.

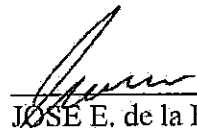
## II. PRAYER

Intervenors hereby request that this Court grant Intervenors' Emergency Motion, grant Intervenors' Application for Temporary Injunction, and pray for any and all other relief to which they may be justly entitled.

Respectfully submitted,

**LLOYD GOSSELINK**  
**ROCHELLE & TOWNSEND, P.C.**  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5800  
Facsimile: (512) 472-0532

By:

  
\_\_\_\_\_  
JOSE E. de la FUENTE  
State Bar No. 00793605  
[jdelafuente@lglawfirm.com](mailto:jdelafuente@lglawfirm.com)  
TYLER T. O'HALLORAN  
State Bar No. 24083590  
[tohalloran@lglawfirm.com](mailto:tohalloran@lglawfirm.com)

**DAVIDSON TROILO REAM & GARZA**  
A Professional Corporation  
7550 IH-10 West, Suite 800  
San Antonio, Texas 78229-5815  
Telephone: (210) 349-6484  
Facsimile: (210) 349-0041

Keith Kendall  
State Bar No. 11263250  
[kkendall@dtgrglaw.com](mailto:kkendall@dtgrglaw.com)

**ATTORNEYS FOR MISSION  
AND INTERVENORS**

CERTIFICATE OF SERVICE

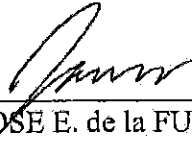
I hereby certify that a true and correct copy of the foregoing document has been forwarded to the following attorneys via e-service and electronic mail on this 22nd day of October, 2015:

David B. West  
[dwest@dykema.com](mailto:dwest@dykema.com)  
Larissa Sanchez Fields  
[lfields@dykema.com](mailto:lfields@dykema.com)  
DYKEMA COX SMITH  
112 East Pecan Street, Suite 1800  
San Antonio, Texas 78205

Kent C. Krause  
[kkrause@cdklawfirm.com](mailto:kkrause@cdklawfirm.com)  
CRADDOCK DAVIS & KRAUSE, LLP  
3100 Monticello Avenue, Suite 550  
Dallas, Texas 75205

James L. Anthony  
[james.anthony@texasattorneygeneral.gov](mailto:james.anthony@texasattorneygeneral.gov)  
Assistant Attorney General  
Financial Litigation, Tax and  
Charitable Trusts Division  
P.O. Box 12548, Mail Code 017-11  
Austin, Texas 78711-2548

Lloyd J. Lunceford  
[Lloyd.lunceford@taylorporter.com](mailto:Lloyd.lunceford@taylorporter.com)  
Taylor, Porter, Brooks & Phillips, LLP  
451 Florida Street, 8<sup>th</sup> Floor  
Baton Rouge, LA 70821

  
\_\_\_\_\_  
JOSE E. de la FUENTE