



July 26, 2024

**BY EMAIL ONLY (hearingpanel.rochester.diocesan@episdionc.org)**

The Rt. Rev. Jennifer Brooke-Davidson  
Convenor of the Hearing Panel  
Episcopal Diocese of North Carolina  
4800 Six Forks Road  
Raleigh, NC 27609

*Re: Title IV Matter (Rochester), The Rt. Rev. Prince Singh, Respondent*

Dear Bishop Brooke-Davidson:

\ Pursuant to Canon IV.13.2.c, I am writing on behalf of my client, The Rt. Rev. Prince Singh (“Respondent”) to request that the Hearing Panel grant a 28-day extension of time within which my client may respond to the Written Statement of Offense prepared in this matter. If granted by the Hearing Panel, the new deadline for submitting Respondent’s response to the Written Statement of Offense would be Monday, August 26, 2024.

In support of this request, I respectfully submit the following:

1. The Written Statement of Offense (“WSO”) was transmitted to Respondent and his counsel via E-mail on Thursday, June 27, 2024. As provided by Canons IV.13.2.c and IV.19.8, Respondent’s response thereto is due on or before Monday, July 29, 2024. That time has not yet expired.
2. It is Respondent’s understanding that the initial complaint in this matter was received by the Intake Officer in June or July, 2023. According to the WSO, this matter was referred by the Reference Panel for Investigation on October 10, 2023, and the Investigator returned his report approximately seven months later, on May 3, 2024. The matter was thereafter referred by the Reference Panel to this Hearing Panel on June 7, 2024. Thereafter, the Church Attorney requested and Respondent voluntarily agreed to an extension of time for the Church Attorney to complete the WSO.
3. This matter was referred by the Reference Panel directly to this Hearing Panel, with no intervening Conference Panel proceeding. As such, Respondent was not formally apprised of the allegations against him until his and counsel’s receipt of the WSO. Respondent has no Canonical right of access to investigatory materials during the intake and reference phases of the Title IV process. Moreover, Respondent was never interviewed by the Investigator during the investigatory process. Hence, Respondent

was unaware of the specific nature of the factual allegations or purported Canonical violations prior to his receipt of the WSO.

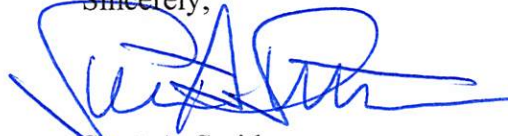
4. The allegations contained in the WSO stem from events allegedly taking place during 2017 and 2018. Respondent today possesses few if any records from that time frame which are relevant to this matter.
5. In an effort to prepare an informed and substantive response to the WSO in the hopes of sharpening the factual issues in dispute, in early July I asked the Church Attorney to provide relevant documents from Diocesan files which would shed light on what occurred so many years ago. The Church Attorney has been cooperative with regard to that request. Unfortunately, it has not been possible for the Church Attorney to fully respond thereto prior to the date Respondent's response to the WSO is due. Based upon my conversations with the Church Attorney, I understand that the Church Attorney is continuing to work on my request in good faith. Allowing an extension of time will permit that process to move forward and hopefully allow for a more cogent and detailed response to the WSO.
6. In addition to my work in this matter, I represent Respondent in an unrelated Title IV matter which has recently consumed, and will continue to consume, substantial amounts of my time. Beyond that, I currently represent several Members of the Clergy in other Title IV and Title III (dissolution of the pastoral relationship) matters across the United States, and I am currently engaged as the Investigator in two very active Diocesan investigations under Canon IV.11. For these reasons as well, affording Respondent additional time within which to investigate the pertinent facts, and prepare and submit an appropriate response to the WSO is reasonably warranted.
7. In discussions with the Church Attorney over this matter, I have informed the Church Attorney of Respondent's intent to seek an extension of time to respond to the WSO. It is my understanding, based upon those discussion, that the Church Attorney does not object to a reasonable extension of time.
8. Respondent has sought no prior extensions of time with regard to this matter.

Based upon the following, I respectfully submit that the foregoing constitutes good cause for the 28-day extension of time sought by Respondent herein.

Thank you for your attention to this request, and please feel free to contact me at your convenience if you have any questions.

The Rt. Rev. Jennifer Brooke-Davidson  
July 26, 2024  
Page 3 of 3

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott A. Smith", with a long horizontal flourish extending to the right.

Scott A. Smith

cc: Craig Thomas Merritt, Church Attorney  
The Rt. Rev. Phoebe Roaf, Advisor to the Respondent