

Appendix A

February 2012 Interrogatories

3. Strike.

5. Please describe any property in the state of Vermont owned by the Roman Catholic Diocese of Albany, New York, including its parishes and sub-entities.

6. Please identify all vendors with whom the [Diocese of Albany], including its parishes and sub-entities, have done business in Vermont since 2002.

7. Strike.

8. Strike.

9. Please identify the number of contributors and state the date and amount of all contributions the [Diocese of Albany], including its parishes and sub-entities, has received from anyone in Vermont since 2002.

10. Strike.

11. Please identify the recipients of all mailings of the Evangelist to Vermont addresses since 2002, stating dates of mailings and describe the mailings.

12. Please identify any Vermont resident to whom the [Diocese of Albany], including its parishes or sub-entities, has sent any diocesan publications such as newspapers, bulletins, or magazines since 2002, state the dates of the mailings and identify the publications.

13. Strike.

14. Please identify in each instance since 2002 when the Albany Diocese, a cleric, priest or other Diocesan employee has undertaken any religious activities or duties in the Roman Catholic Diocese of Burlington, Vermont. This specifically includes but is not limited to a priest celebrating mass in a parish in Vermont. As to each instance, please:

- a. State the name of the employee and the employee's title;
- b. State the location in Vermont, including the specific parish;

- c. State the duties that were undertaken;
- d. State the frequency of the activity;
- e. State the dates of the activity;
- f. State the identity of the employee's supervisor.
- g. Produce all documents relating to each instance.

15. Please identify any instance in which an Albany Diocese priest has been the administrator of a parish in Vermont since 2002, stating as to each:

- a. The parish;
- b. The employee;
- c. The dates that the priest was the administrator.

16. Strike.

17. Strike.

18. Please identify all Albany Diocese employees, including parishes or other sub-entities whom the Albany Diocese has employed since 2002 who lived in the state of Vermont.

19. Please produce the number of Vermont residents who attend or have attended St. Mary's Academy, Hoosick, New York since 2002.

20. Strike.

21. Strike.

22. Strike.

23. Please describe any instances since 2002 where the Albany Diocese, including its parishes or sub-entities, either directly or through its insurance companies, has had a claim made against it by a Vermont resident or by anyone as a result of events arising in Vermont and produce all documents associated with each claim.

April 2012 Interrogatories

1. Please identify all persons answering these interrogatories or who was consulted in order to answer each question, identify the questions they answered or consulted on and their association and/or position with the Roman Catholic Diocese of Albany, New York.

2. Please describe each step taken to respond to these special interrogatories and requests to produce, including but not limited to where you looked for documents.
3. Please provide the number of Vermont residents currently attending parishes within twenty-five miles of Vermont.
4. Strike.
5. Strike.
6. Please produce those portions of the personnel file for any Albany Diocese cleric or agent who has acted as the administrator or overseer of a parish in Vermont since 2002 or celebrated mass in Vermont which relate to such service.
7. Please identify any instance in which an Albany Diocese cleric has been the administrator or overseer of a parish in Vermont since 2002, stating as to each:
 - a. The parish;
 - b. The employee;
 - c. The dates that the cleric was the administrator or overseer.
8. Please produce those portions of the personnel file for any Albany Diocese cleric or agent who has been an overseer or administrator of a Vermont parish or Church or administered any sacraments in Vermont since 2002 which relate to such service.
9. Please produce all documents relating to the role as administrator or overseer of a Vermont parish or church that any Albany Diocese cleric or agent has performed since 2002.
10. Please produce those portions of the personnel files for Fr. Thomas Zelker and for Fr. Phillip Cioppa which relate to work they did in Vermont.
11. Please produce all Quinquennial Reports from 2002 to date.