



IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF LOUISIANA

JOHN DOE XX

VS.

CIVIL ACTION NO. C.A. NO. 3:11-CV-00651

HOLY SEE (State of Vatican City), THE REDEMPTORISTS/NEW ORLEANS VICE PROVINCE, VERY REVEREND HARRY GRILE, C.S.R., HIS PREDECESSORS AND SUCCESSORS, AS PROVINCIAL SUPERIOR OF THE REDEMPTORISTS/DENVER PROVINCE, ROMAN CATHOLIC CHURCH OF DIOCESE OF BATON ROUGE, MOST REVEREND ROBERT W. MUENCH, HIS PREDECESSORS AND SUCCESSORS, AS BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF BATON ROUGE, CHRISTOPHER JOSEPH SPRINGER, AND FIREMAN'S FUND INSURANCE COMPANY

(If the action is pending in another district, state where: Middle District of Louisiana)

NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

To by and through their attorney(s) of record: Don M. Richard (KINNEY ELLINGHAUSEN RICHARD & DESHAZO), C. Michael Pfister (DUPLASS, ZWAIN, BOURGEOIS, PFISTER & WEINSTOCK), and V. Charlie Cusimano (HERBERT, SPENCER, CUSIMANO & FRY)

You will please take notice that fourteen (14) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION (BUSINESS) 3211 4th Street NE Washington, DC 20017-1194 before a Notary Public for THE LEGAL CONNECTION, INC. 5901 Old Fredericksburg Road, D101 Austin, TX 78749 512.892.5700 Fax 512.892.5703

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 45, Federal Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

PLEASE SEE ATTACHED EXHIBIT "A" HERETO

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

Signature of Felecia Y. Peavy, Esquire. FELECIA Y. PEAVY, ESQUIRE 2 Houston Center 909 Fannin, Suite 1910 Houston, TX 77010 713.222.0205 713.236.8547 Fax Attorney for Plaintiff SBA # 15698820

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day. Dated: February 1, 2012

Signature of the certifier.

Order No. 2386

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

JOHN DOE XX

VS.

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(If the action is pending in another district, state
where: Middle District of Louisiana)

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VERY REVEREND HARRY GRILE, C.S.R., HIS
PREDECESSORS AND SUCCESSORS, AS PROVINCIAL
SUPERIOR OF THE REDEMPTORISTS/DENVER
PROVINCE, ROMAN CATHOLIC CHURCH OF DIOCESE
OF BATON ROUGE, MOST REVEREND ROBERT W.
MUENCH, HIS PREDECESSORS AND SUCCESSORS, AS
BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE
DIOCESE OF BATON ROUGE, CHRISTOPHER JOSEPH
SPRENGER, AND FIREMAN'S FUND INSURANCE
COMPANY

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION
Records Pertaining To: PLEASE SEE ATTACHED EXHIBIT A HERETO
Type of Records: BUSINESS RECORDS

1. Please state your full name.

Answer: _____

2. Please state by whom you are employed and the business address.

Answer: _____

3. What is the title of your position or job?

Answer: _____

4. Are these BUSINESS RECORDS, as outlined in the subpoena duces tecum, which were reported by and/or collected by the Roman Catholic Diocese of Baton Rouge, in your custody or subject to your control, supervision or direction?

Answer: _____

5. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: _____

Order No. 2386.001

6. Please hand to the Officer taking this deposition copies of the **BUSINESS RECORDS** mentioned in Question No. 4. Have you complied? If not, why?

Answer: _____

7. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such **BUSINESS RECORDS**.

Answer: _____

8. Were these **BUSINESS RECORDS** kept in the regular course of business of the **U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION**?

Answer: _____

9. Was the method of preparation of these records trustworthy?

Answer: _____

WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____ known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 20_____.

NOTARY PUBLIC

My Commission Expires: _____

EXHIBIT "A"

Any and all BUSINESS records, including but not limited to: any type of correspondence, whether in electronic form or reduced to writing, regarding credible accusations of abuse and the costs in dealing with abuse allegations in implementing the Charter for the Protection of Children and Young People, as reported by and/or collected from the Roman Catholic Diocese of Baton Rouge FROM 1/1/2002 TO PRESENT.

Order No. 2386 Exhibit "A"

FACSIMILE TRANSMISSION

TO: Don M. Richard
FROM: The Legal Connection, Inc.
DATE: February 2, 2012

Re: C.A. NO. 3:11-CV-00651; JOHN DOE XX v. HOLY SEE (State of Vatican City), THE REDEMPORISTS/NEW ORLEANS VICE PROVINCE, VERY REVEREND HARRY GRILE, C.S.R., HIS PREDECESSORS AND SUCCESSORS, AS PROVINCIAL SUPERIOR OF THE REDEMPORISTS/DENVER PROVINCE, ROMAN CATHOLIC CHURCH OF DIOCESE OF BATON ROUGE, MOST REVEREND ROBERT W. MUENCH, HIS PREDECESSORS AND SUCCESSORS, AS BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF BATON ROUGE, CHRISTOPHER JOSEPH SPRINGER, AND FIREMAN'S FUND INSURANCE COMPANY

WAIVER OF NOTICE AND REQUEST FOR COPIES OF RECORDS

Our client, Felecia Y. Peavy, has commissioned THE LEGAL CONNECTION, INC. ("TLC") to obtain records on SEE ATTACHED EXHIBIT A HERETO from the following custodian(s) for use in the above referenced case. You will find a copy of the Notice of Intention to Take Deposition Upon Written Questions and said Questions attached thereto.

I DO AGREE TO WAIVE THE NOTICE PERIOD. X I DO NOT AGREE TO WAIVE THE NOTICE PERIOD.

TLC would like to offer you this opportunity to obtain a copy of the documents received from the Custodian(s) of Record listed below. Please indicate what type of copies (Paper or Digital or Both) you would like BY MARKING "Y" for "YES" OR "N" for "NO" beside each location below:

PAPER DIGITAL
U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION (BUSINESS)

If you choose to obtain copies (whether in paper or digital format), the cost will involve a \$65 base fee, \$15 delivery fee, \$25 administrative fee, and \$.55/page for exhibits/scans. Paper copies will incur an additional \$20 binding fee. If you would like the documents on CD in addition to a paper copy, an additional fee of \$25 will be charged for each CD provided.

Yes, I want a CD of the records Yes, I want an email of the records
Digital copies of all the legals and records should be in the following format:
Digital copies should only be emailed to the following email address:

Photographs, videotapes, audiotapes, medical imaging exhibits, and CD duplications will incur additional charges.
Yes, I want copies of all medical imaging (x-rays, MRI's, etc.) Yes, I want copies of all audio/video tapes.
Yes, I want copies of all photographs in the following manner: Black/White, Color copies, or Photo reprints

THE LEGAL CONNECTION, INC. also offers direct billing to most insurance companies.
I agree that I and/or my firm will be responsible for payment of the copies of records ordered on this waiver. I acknowledge that invoices are due and payable within 30 days of receipt and that actions for collection of services are performable and payable in Travis County, Texas.

RETURN TO:
THE LEGAL CONNECTION, INC.
ATTN: Miranda Ruiz
5901 Old Fredericksburg Road, D101
Austin, TX 78749
Phone: 512.892.5700
Fax: 512.892.5703

not
AGREED BY:
Don M. Richard
Don M. Richard
KINNEY ELLINGHAUSEN RICHARD & DESHAZO
1250 Poydras St., Suite 2450
New Orleans, LA 70113
504.524.0206 Fax 504.525.6216
Attorney for Defendant

Date: February 2, 2012
NOTE: RETURN OF THIS FORM IS REQUIRED WITHIN FOURTEEN (14) DAYS TO PROCESS YOUR REQUEST. ANY CANCELLATION OF THE ABOVE MUST BE IN WRITING. IF THE RECORDS HAVE ALREADY BEEN COPIED AND FEES INCURRED, THEN BILLING WILL BE PRORATED ACCORDINGLY.