

EXHIBIT

‘A’

THE LEGAL CONNECTION, INC.

5901 Old Fredericksburg Road, D101
Austin, TX 78749
Phone: 512.892.5700 Fax: 512.892.5703

February 15, 2012

VIA: [] CMRR MAIL: 7010 3090 0001 3991 3639

CUSTODIAN OF RECORDS
U.S CONFERENCE OF CATHOLIC BISHOPS,
SECRETARIAT OF CHILD AND YOUTH PROTECTION
Attention: General Counsel
3211 4th Street NE
Washington, DC 20017-1194

Re: Cause No. C.A. NO. 3:11-CV-00651; **JOHN DOE XX v. 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;** In the MIDDLE DISTRICT OF LOUISIANA Judicial Court of County, Texas

Dear Custodian of Record:

The Legal Connection, Inc. ("TLC") has been retained to obtain records for the following subject in the above-referenced matter. You will find a Notice, Subpoena, and Deposition Upon Written Questions for BUSINESS RECORDS pertaining to: **Subject: SEE ATTACHED EXHIBIT A HERETO**

All evidence you have on file that might be used as evidence in this case should hereby be preserved electronically and/or physically until further notified by the Subpoenaing Party in this matter.

Please complete the following steps to ensure the records requested are ready for use in court.

1. Answer ALL the questions, sign on the witness signature line, and have your signature notarized. If there is an Affidavit, have it completed too. Make sure the Notary Public signs and stamps the paperwork. We need the **original** signed answers returned to our office.
2. If you DO NOT HAVE ANY RECORDS, please call us immediately.
3. Please send a pre-payment request via fax to our office at 512.892.5703 with my name and order number for authorization of expenses OVER AND ABOVE \$50.00. If pre-payment is required, do not send the request back. We will send the payment immediately upon approval.
4. Please make all copies SINGLE SIDED on 8½x11" paper. They should be clear and legible. If the originals are not clear and legible, please do your best and note the issues on your Deposition answers.

Please provide the documents as soon as possible and no later than 02/29/2012 9:00AM.

Please DO NOT FAX your responses. Please mail all copies of records and the original completed legal documents to the address above to my attention. Thank you!

Order No.: 2386.001

Contact: Matt Mueck

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:

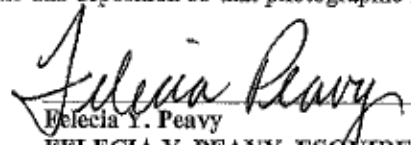
U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION (BUSINESS)
3211 4th Street NE
Washington, DC 20017-1194

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

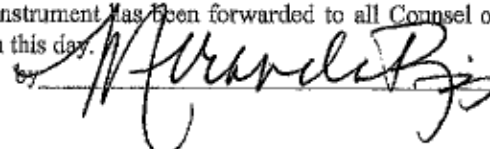
and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.


Felecia Y. Peavy
FELECIA Y. PEAVY, ESQUIRE
2 Houston Center
909 Fannin, Suite 1910
Houston, TX 77010
713.222.0205 713.236.8547Fax
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



United States District Court

FOR THE DISTRICT OF COLUMBIA

JOHN DOE XX

SUBPOENA IN A CIVIL CASE

VS.

CASE NUMBER: 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)

TO: Custodian of Records for: **U.S CONFERENCE OF CATHOLIC BISHOPS,
SECRETARIAT OF CHILD AND YOUTH PROTECTION
3211 4th Street NE
Washington, DC 20017-1194**

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of deposition in the above case.

PLACE OF DEPOSITION The office of the custodian: 3211 4th Street NE, Washington DC 20017-1194	DATE AND TIME Instant
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YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLEASE SEE ATTACHED EXHIBIT "A" HERETO

PLACE The office of the custodian: 3211 4th Street NE, Washington, DC 20017-1194	DATE AND TIME Instant
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YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b) (6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF)

Felecia Peavy
Attorney for JOHN DOE XX

DATE

2/15/2012

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Felecia Peavy, Attorney at Law
FELECIA Y. PEAVY, ESQUIRE
2 Houston Center
909 Pannin, Suite 1910
Houston, TX 77010
Phone: 713.222.0205; Fax: 713.236.8547

(See Rule 48, Federal Rules of Civil Procedure, Parts C & D on Reverse)

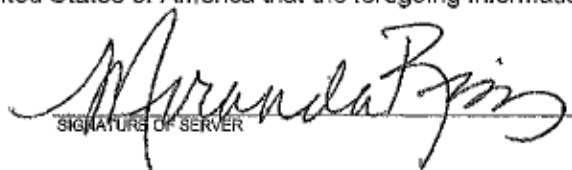
PROOF OF SERVICE

SERVED	DATE <i>2/15/2012</i>	PLACE U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION 3211 4th Street NE Washington, DC 20017-1194
	SERVED ON (PRINT NAME) Custodian of Record for U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION	MANNER OF SERVICE United States Postal Service, First Class Mail
SERVED BY (PRINT NAME) Miranda Ruiz, The Legal Connection, Inc.	TITLE Firm Representative	

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on *2/15/2012*
DATE


SIGNATURE OF SERVER
5901 Old Fredericksburg Road, D101
ADDRESS OF SERVER

Austin, Texas 78749

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (c) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel the production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person,

except that, subject to the provisions of clauses (c) (3) (B) (iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and not exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- (iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

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.

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)

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: _____

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: _____

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

JOHN DOE XX

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VS.

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

HOLY SEE (State of Vatican City), et al.

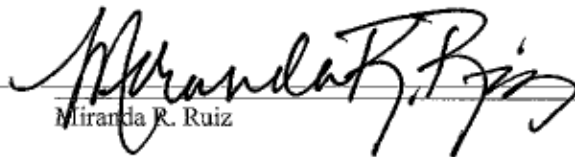
AFFIDAVIT

State of Texas
County of Travis

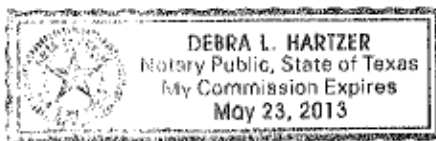
Before me, the undersigned authority, personally appeared Miranda R. Ruiz, who, being by me duly sworn, deposed as follows:

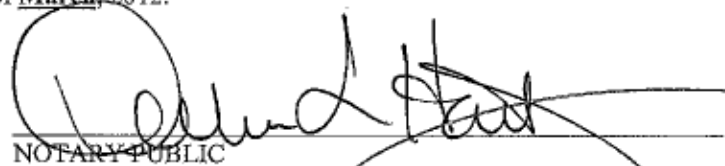
"My name is Miranda R. Ruiz, I am not a party to the action, I am over eighteen (18) years of age, of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated:

On January 26th, 2012, a subpoena request for records was received from Felecia Y. Peavy, Esquire, to be issued to the U.S. CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION. As customary in my position, I researched this location to verify the correct method of service accepted. I was directed to speak with the General Counsel and spoke with an Administrator in that department who advised me the subpoena could be issued via U.S. Postal Service Certified Mail and Hand Service was not necessary. Keeping my client's costs in mind and since it was determined that Certified Mail was accepted, the subpoena was issued via U.S. Certified Mail Return Receipt Requested Tracking Number 7010 3090 0001 399 3639 on February 16, 2012 with a \$40 witness fee included.


Miranda R. Ruiz

Sworn to and subscribed before me on the 21st day of March, 2012.




NOTARY PUBLIC

My Commission Expires: _____

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent Addressed
Everett Campbell
- B. Received by (Printed Name) *C. Napfley* C. Date of Delivery *2/21/12*
- D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

U.S. CONFERENCE OF CATHOLIC BISHOPS.
 SECRETARIAT OF CHILD AND YOUTH PROTECTION
 Attention: General Counsel
 3211 4th Street NE
 Washington, DC 20017-1194
 Order No. 2386.001 / MRR / MM

3. Service Type
- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
 (Transfer from service label)

7010 3090 0001 3991 3639

PS Form 3811, February 2004

Domestic Return Receipt

102586-02-M-154

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information, visit our website at www.usps.com

OFFICIAL USE

7010 3090 0001 3991 3639

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent to
 U.S. CONFERENCE OF CATHOLIC BISHOPS,
 SECRETARIAT OF CHILD AND YOUTH PROTECTION
 Attention: General Counsel
 3211 4th Street NE
 Washington, DC 20017-1194
 Order No. 2386.001 - MRR - MM

PS Form 3800, AUGUST 2006

See Reverse for Instructions

2/15/2012

U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION

Forty and No/100 *****

U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION
Legal Department
3211 4th Street NE
Washington, DC 20017-1194

U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION
SEE ATTACHED EXHIBIT A HERETO
Order No. : 2386.001

FEDERAL WITNESS FEE

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