

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

JOHN DOE XX	§ C.A. NO. 3:11-cv-00651
	§
VS.	§
	§
HOLY SEE (State of the 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	§ JUDGE JAMES J. BRADY
PROVINCE, ROMAN CATHOLIC CHURCH	§
OF THE 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	§ MAG. JUDGE CHRISTINE NOLAND

REPLY TO PLAINTIFF’S RESPONSE TO JOINT MOTION TO QUASH NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS AND SUBPOENA FOR RECORDS FOR UNITED STATES CATHOLIC CONFERENCE OF BISHOPS

MAY IT PLEASE THE COURT:

The Defendants object to the data and information requested by the Subpoena as set forth in their Motion to Quash. The information sought pursuant to the Subpoena is information provided by the Diocese of Baton Rouge to the United States Catholic Conference of Bishops. The Diocese of Baton Rouge is in the process of responding to a Request for Production of Documents which, excluding subparts, encompasses 101 requests for production.

Encompassed in the Plaintiff’s extensive Request for Production of Documents are requests for the same or similar information as the information sought by the Plaintiff from the

Office of the United States Catholic Conference of Bishops. Defendants intend to object to many of these requests on a number of grounds including the grounds set forth in the Joint Motion by Defendants to Quash Notice of Intention to Take Deposition By Written Question and Subpoena for Records for the United States Catholic Conference of Bishops. Since the information requested from the United States Catholic Conference of Bishops is information directly provided by the Defendants, Defendants submit that, before Plaintiff obtains the information from the United States Catholic Conference of Bishops, this Court should consider the Defendants' objections to the Requests for Production of Documents requesting essentially the same or similar information and determine whether the information requested is discoverable in this case. Allowing the Plaintiff to obtain the information from a third-party would not allow the Defendants the opportunity to object to the request for its own records as set forth in the Federal Rules of Civil Procedure.

Respectfully submitted,

DUPLASS, ZWAIN, BOURGEOIS,
PFISTER & WEINSTOCK

/s/ C. Michael Pfister

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his Predecessors and Successors, as Bishop of the Roman
Catholic Church of the Diocese of Baton Rouge, and
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*Attorneys For Defendants, Redemptorists/New Orleans Vice
Province and Fr. Harry Grile On Behalf Of The Denver
Province Of The Redemptorists*

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of March, 2012, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the court's electronic filing system.

/s/ C. Michael Pfister

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