

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

JOHN DOE XX

§ C.A. NO. 3:11-cv-00651

VS.

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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  
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

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JUDGE JAMES J. BRADY

MAG. JUDGE DOCIA L. DALBY

**JOINT MOTION BY DEFENDANTS TO QUASH AMENDED NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS AND/OR SUBPOENA FOR  
RECORDS FOR THE UNITED STATES CONFERENCE OF CATHOLIC BISHOPS**

NOW INTO COURT, through undersigned counsel, comes the following Defendants who jointly move the Court to quash the Amended Notice of Intention to take Deposition by Written Questions and the Subpoena for Records. The moving Defendants are Redemptorist/ New Orleans Vice Province, Very Rev. Harry Grile, C.Ss.R., his Predecessors and Successors, as Provincial Superior of the Redemptorist/Denver Province, the 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 and Fireman's Fund Insurance Company.

1.

On or about April 4, 2012, undersigned counsel for the above mentioned parties received an Amended Notice of Intention to Take Deposition by Written Questions, which was directed to the United States Conference of Catholic Bishops, Secretariat of Child and Youth Protection (Business), 3211 4<sup>th</sup> Street NE, Washington, DC 20017-1194. The Amended Notice was issued by The Legal Connection, Inc. of 5901 Old Fredericksburg Road, D101, Austin, TX 78749. At the same time that the Amended Notice of Intention to Take Deposition by Written Questions was issued, apparently a request for a Subpoena Duces Tecum to produce records exhibited on Exhibit A was likewise requested to be served upon the United States Conference of Catholic Bishops.

2.

This Court had previously quashed a similar request by Order dated April 2, 2012.

3.

For reasons which will more fully be explained in the Memorandum attached and submitted herein simultaneously, the Defendants request that the Court quash the Subpoena for records to the United States Conference of Catholic Bishops and the Amended Notice of Intention to Take Deposition by Written Questions.

4.

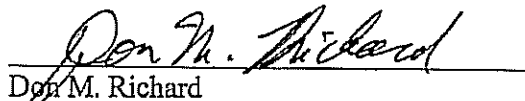
Defendants have recently objected to and responded to certain document requests of the Plaintiff. The information sought from the United States Conference of Catholic Bishops is information that was also requested from the Roman Catholic Church of the Diocese of Baton Rouge. Plaintiff and Defendants are in the process of narrowing the discovery issues between them and anticipate seeking judicial assistance in determining what is and is not discoverable. Defendants

submit that the United States District Court for the Middle District of Louisiana is the appropriate forum to determine whether or not the information sought by the Plaintiff from the United States Conference of Catholic Bishops is discoverable in this matter and, in the event the Court rules that the information is discoverable, the Diocese of Baton Rouge will provide the requested information in accordance with this Court's discovery rulings.

WHEREFORE, Defendants, mentioned above, jointly move that the Court quash the Subpoena and the Subpoena for records of the Amended Notice of Intention to Take Deposition by Written Questions.

Respectfully submitted,

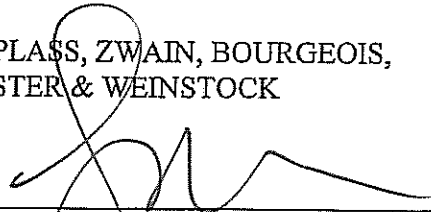
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*Attorneys For Defendants, Roman Catholic Church  
Of The Diocese Of Baton Rouge, Most Reverend  
Robert W. Muench, his Predecessors and Successors,  
as Bishop of the Roman Catholic Church of the  
Diocese of Baton Rouge, and Fireman's Fund  
Insurance Company*

CERTIFICATE OF SERVICE

I hereby certify that on the 22<sup>nd</sup> day of May, 2012, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.



C. MICHAEL PFISTER