

# EXHIBIT

‘A’

# THE LEGAL CONNECTION, INC.

5901 Old Fredericksburg Road, D101

Austin, TX 78749

Phone: 512.892.5700 Fax: 512.892.5703

April 24, 2012

VIA: [ x ] HANDSERVED

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 District 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 05/25/2012 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.**

**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**

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: CIVIL ACTION NO. C.A. NO. 3:11-CV-00651  
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: (If the action is pending in another district, state where:  
Middle District of Louisiana)

**AMENDED NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To other party/parties by and through their attorney(s) of record: **C. Michael Pfister (DUPLASS, ZWAIN, BOURGEOIS, PFISTER & WEINSTOCK), Don M. Richard (KINNEY ELLINGHAUSEN RICHARD & DESHAZO) 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.

Please further take notice that only the depositions of the designated Custodian of Records for the parties listed above will be Amended. Any other parties listed on prior Notices will continue as originally noticed.



Felecia Y. Peavy  
FELECIA Y. PEAVY, ESQUIRE  
The Esperson Buildings  
808 Travis, Suite 907  
Houston, Texas 77002  
713.222.0205 713.236.8547 Fax  
Attorney for Plaintiff  
SBA # 15698820

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**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: April 4, 2012

by 

# 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**  
 (on file in the MIDDLE DISTRICT OF  
 LOUISIANA District of  
 TENNESSEE, Division)

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

**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	DATE AND TIME
The office of the custodian: <b>3211 4th Street NE, Washington DC 20017-1194</b>	<b>05/25/2012 9:00AM</b>

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	DATE AND TIME
The office of the custodian: <b>3211 4th Street NE, Washington, DC 20017-1194</b>	<b>05/25/2012 9:00AM</b>

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

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)	DATE
<i>Felecia Peavy</i> Attorney for JOHN DOE XX	April 24, 2012

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

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

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on Reverse)

# AFFIDAVIT OF PROCESS SERVER

United States District Court

State of Louisiana

John Doe XX

Plaintiff

vs.

Holy See, et al

Defendant

Attorney:

The Legal Connection, Inc  
5901 Old Fredericksburg Rd, D101  
Austin, TX. 78749

Case Number: 3:11-CV-00651

Legal documents received by One Source Process on May 04th, 2012 at 9:30 AM to be served upon US Conference of Catholic Bishops at 3211 4th St NE, Washington, DC. 20017

I, Christian A. Miles, swear and affirm that on **May 08th, 2012 at 12:54 PM**, I did the following:

Served the **corporation** listed as the intended recipient of the legal documents by delivering a conformed copy of the **Subpoena, Deposition Upon Written Questions for Business Records** to **Jeff Moon** as **Authorized Agent** of the within named corporation. The service date, time, my initials and/or name, and identification number, if required by state statute, were listed on the document served.

**Description of Person Accepting Service:**

Sex: Male Age: 46 Height: 5'10 Weight: 170 Skin Color: White Hair Color: Brown Glasses: Y

**Supplemental Data Appropriate to this Service:**

I declare that I am eighteen years of age or older and have no interest in the above legal matter. I attest that I am certified, appointed by sheriff or motion and order and that I am legally authorized to serve court documents within the above named circuit / county.



Christian A. Miles  
Process Server

One Source Process  
2200 Pennsylvania Ave NW  
East Tower 4th Floor  
Washington, DC 20037

(202) 459-4760

Internal Job ID: 2012001770

Reference Number: 2386.001

BRANDON YOSHIMURA  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires April 30, 2016

District of Columbia: SS

Subscribed and sworn to before me, in my presence,  
this 8<sup>th</sup> day of May, 2012



Notary Public, D.C.

My commission expires 4/30/2012



## **EXHIBIT "A"**

Any and all business records, including but not limited to: any type of correspondence or reports, whether in electronic form or reduced to writing, regarding allegations of abuse occurring in 1961 to 2002 and the costs in dealing with abuse allegations from 1961 to 2002, as reported by and/or collected from the Roman Catholic Diocese of Baton Rouge.

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

**JOHN DOE XX**

**VS.**

**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**

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: **CIVIL ACTION NO. C.A. NO. 3:11-CV-00651**  
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: (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 from 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: \_\_\_\_\_