

# ECKERT SEAMANS CHERIN & MELLOTT

ATTORNEYS AT LAW

June 23, 1993

*Dwyer  
Barrett  
Dunn*

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Wilson Rogers, Jr., Esquire  
Dunn & Rogers  
20 Beacon Street  
Boston, MA 02108

Re: [REDACTED]

Dear Wil:

This is a follow-up to our meeting of March 4, 1993 and correspondence of April 21, 1993 regarding Mr. [REDACTED] claims against the Archdiocese of Boston as the result of the sexual abuse he suffered from Fathers Barrett, Dwyer and Dunn. I have again enclosed a copy of the factual statement regarding Mr. [REDACTED] abuse. Although it had been made clear to [REDACTED] that his was not the first allegation of abuse that had been brought to the attention of the Archdiocese regarding these three priests, we have not had the results of the investigation into this matter.

At this time, Mr. [REDACTED] has instructed us to make several demands of the Archdiocese. It is our understanding that Father Dwyer is deceased, and that Father Dunn has been laicized. However, we would like to know the permanent status of Father Barrett so that we can feel comfortable that other children will not be placed at risk.

My client's second priority is to receive compensation for his injuries. Although we believe that the Archdiocese has taken an appropriate first step by agreeing to pay for Mr. [REDACTED] counseling, there are significant damages which my client has suffered over the years because of the actions of these three priests and the negligence of the Archdiocese in failing to take steps to prevent the abuse.

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Mr. [REDACTED] therapist, Gerald A. Carmichael, LICSW, has stated that in addition to an alcohol problem, Mr. [REDACTED] suffers from post-traumatic stress disorder and an agitated depression manifested with episodes of physically acting out and rage. Mr. Carmichael has also stated that the effects on Mr. [REDACTED] marriage and interpersonal relationships have been moderate to severe. Further, Mr. [REDACTED] displays a fragile and disjointed ego structure combined with the harsh and overly critical features of an obsessive compulsive personality disorder. In addition, Mr. [REDACTED] level of trust was significantly impaired as a result of the trauma. Mr. Carmichael describes the harsh toll that has impacted Mr. [REDACTED] due to his mistrust as a result of betrayal by the Church. This has affected Mr. [REDACTED] vocationally, socially and in his role as a husband and father. The effect of the trauma has been most manifest in Mr. [REDACTED] difficulty in expressing affection and experiencing intimacy.

MATTHEW J. MCNAMARA  
617/342-6852

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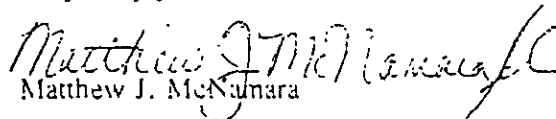
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Wilson Rogers, Jr., Esquire  
June 24, 1993  
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It is clear that Mr. [REDACTED] has incurred substantial injury as the result of the sexual abuse. We believe that Mr. [REDACTED]'s claim is within the statute of limitations insofar as he did not make the causal connection between the sexual abuse and the various emotional/psychological problems until recently. Further, it seems clear that from the other allegations of abuse that the Archdiocese has previously received regarding these three priests and the mere fact that three priests of the same parish were involved in the abuse, authorities within the Archdiocese of Boston either knew or should have known of the abusive acts of these three priests and should have taken steps to protect children, including Mr. [REDACTED]. We intend to recommend that Mr. [REDACTED] file suit against the Archdiocese if this matter cannot be resolved and if the tolling agreements previously provided to you are not executed. In order to avoid protracted litigation, Mr. [REDACTED] is prepared to settle his claims for \$240,000. Such settlement would be well within the range of settlements and verdicts in such cases, and particularly in light of the aggravated nature of the assault by three priests of the Archdiocese.

I would appreciate your prompt response to this letter. Further, I would ask that you provide us with the results of the Archdiocese's investigation of these three priests.

Very truly yours,

  
Matthew J. McNamara

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