

CLERGY CASES 1
Fr. Berard Connolly
Franciscan Friar (OFM)
Confidential File

Bates Number 392 was removed by the Plaintiffs at the request of the Franciscans.

Accused cleric in treatment center

A Franciscan brother being sued by a Spokane woman who claims he sexually abused her is on administrative leave and in a psychiatric treatment center, said a top official of the order.

Berard Connelly was placed on leave in September after the Franciscan order learned the details of allegations by a former student at a Spokane all-girls high school where Connelly taught more than 20 years ago, said the Very [REDACTED] head of the Franciscan friars in the Western United States.

"He's in a psychiatric treatment center that specializes in issues of abuse," [REDACTED] said Thursday night.

"He'll be on administrative leave until an accurate determination can be made of his ability to work with people and his fitness to be in the ministry," [REDACTED] said.

The Franciscans are also offering to pay for counseling for [REDACTED] the complainant in the suit filed earlier this week in Spokane County Superior Court.

The order will probably decide within a month whether Connelly should be returned to the ministry.

He refused to comment on whether Connelly abused the woman or anyone else claims they were victimized by the cleric.

The lawsuit states Connelly "continuously sexually abused, harassed and intimidated plaintiff and other students" at the now-defunct Marycliff High School.

The abuse took place when [REDACTED] attended the school and St. Ann's parish from 1968 to 1973, the lawsuit says. Connelly taught there and was in charge of student affairs, according to the complaint.

Attempts to reach Connelly and [REDACTED] have been unsuccessful.

Although the alleged incidents happened as many as 24 years ago, [REDACTED] state law extends the statute of limitations for child sex abuse claims.

Bates Numbers 394-397 were removed by the Plaintiffs at the request of the Franciscans.

St. Francis Retreat
P O 1070
San Juan Bautista, CA 95045

5/11/93

Brothers in Apache and O'odham Lands,

This morning I reached the bottom of my clean T-shirt drawer and found a shirt marked "Blessed Kateri Tekakwitha, San Carlos Apache." (Yes, Walt, I paid for it --last summer!) The shirt reminded me I wanted to write you.

I've been wanting to do this for quite awhile. Since last September 17, to be exact. I wanted to apologize for embarrassment or hurt, I wanted to explain. I wanted to be angry. I wanted to say I'm sorry. But, now I just want to tell you I miss "the Globe Friars" very much and I miss The People you serve.

I guess since even before I entered the friars I wanted to be a missionary. Probably not a few of you have heard my story of telling Gus Hobrecht I felt called to the missions and he quickly assured me God wanted me to continue cooking at Serra Retreat!

When finally, after 40 years, I finally did go to the desert -- and counted pennies, pesos and drachmas with Mike at San Xavier, my past soon caught up with me and blew it for me. At least I spent awhile with the greatest friars in the Province and began to love The People you love. I fell in love with San Xavier del Ba:c. I wanted to live and finish out my life among The People. That's not to be.

I daily pray for the Missions in Arizona and New Mexico. Maybe I'll join the FMU. This September I want to visit the San Xavier District and hopefully see you.

I'm feeling fairly good. Time back east helped me out of serious depression. The past years are taking their toll on my body by diabetes and my knee is worse. However, my mind is alert! Seriously, my soul and my heart are at peace. I do not know what is ahead; I am happy I am with friends. -- And, I miss the desert!

I was reading about "dream catchers" woven by the Plains Indians. Good dreams pass through the hole in the center while bad dreams are trapped in the web, where they perish in the light of dawn. I hope you and I, and The People you serve, have mostly good dreams with the bad ones perishing in the dawn.

Peace!

OEM CONN 1
0398



Saint Mary's Basilica

231 North Third Street
Phoenix, Arizona 85004-2265

FRANCISCAN FRIARS

November 24, 1991

Br. Berard Connolly, O.F.M.
St. Francis Retreat Center
PO Box 1070
San Juan Bautista, CA 95045

Dear Berard:

This is meant to be a personal letter. And personal letters should (at least in the old-fashioned way) be handwritten, not typed. However, my handwriting is so wretched that I chose the better part!

Yesterday I was talking with Mel Jurisich and he mentioned that you are at SJB. It is, of course, no surprise that the definitorium knows in general the difficulties that are preying upon you at the present time.

I want you to know that my heart goes out to you, and my prayers and thoughts are with you.

It's truly said that we all have different feelings but the same emotions. In the depths of my own addictive experience I know the heartbreaking sense of shame and fear and guilt. Spiritual writers call it the dark night of the soul. I have been there. So in that sense I can truly say that I am with you during this time in your life.

Don't pack it in, don't hang it up! I am often strengthened by the motto once given to me: This, too, like gas shall pass. It sounds flippant, but there is much truth in it.

As there is great truth in the 1st Step: "We admitted we were powerless...that our lives had become unmanageable." I think of this on the feast of Christ the King. To me the main message on this day is that the Lord came as one who was powerless on earth. But He found meaning for His life and enables us to understand that life is not out of control; that there is a purpose to what happens even though we cannot find a purpose at the time. And that scares us. With God's grace we live through the darkness into the light. The light will come.

*Your friend,
Warren*

OFM CONN 1

0399

(602) 252-7651



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

February 10, 1993

Dear Berard

Peace and good. Enclosed please find the official letter which details what we talked about in Hartford and what I have received from the Institute. Let me add a more personal note.

First, I want to welcome you back heartily to the province. These have been difficult days for the past three years, but I for one am happy you have stuck it out and persevered. It is not only an example to me but a real gift--you see, where would I be without faithful friends, ones who accept my own limitations and are willing even to be hurt by me at times but to still accept me. I thank you for that. And I want to say very clearly, that trying to address your situation has not been burdensome for me--you are not a burden, nor a mistake. You are a wonderful friar, one who contributes immensely to the province and the friars. This is how I feel--and I say this both as friend and as provincial.

I received your sample letter for Westfriars. As far as I am concerned, you may print what you like--it is your letter. If I may offer some personal counsel, I would think it better to talk it over with your therapist and also with Richard. They might have some good advice as to how to approach it and what exactly is best to say. From my perspective, I think you should emphasize that although difficult at first, you found the program beneficial, that you are happy to be back here (which I think you are), that you offer to help anyone who would like to speak with you about the experience, that you hope we can all face ourselves honestly--that is, turn it outward. The "stigma" is not a disease, but a gift to the community, and God has made this now part of yourself precisely for others. I think you should be proud of what you have done to handle all of this. I am.

Thanks for the invite to write on Clare. I think I will take you up on this--I will be giving a retreat to the Clare in June in SB, and plan to write up some of the conferences. Also, may I suggest that we try to dig up several conferences by David Temple and in honor of the centenary publish one with each edition of Westfriars. Dave left over fifteen feet of talks, many of them on Clare. Some are notes, but they are quite full. I can try to locate some when I am in SB; or perhaps you can go down there and look with Tim's help. It is just an idea.

God bless you, Berry. I love you.

OFM CONN 1

0400



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

Brother Berard Connolly, OFM
St. Francis Retreat
549 Mission Vineyard Rd
Box 1070
San Juan Bautista, Ca. 95045

February 10, 1993

Dear Berard

Peace. I hope you are doing well; I'm glad to hear that you are enjoying the retreats. You're good at it, and that makes a lot of sense. I am really glad you can help at San Juan and continue to do Westfriars.

I have heard from the Institute of Living and would ask you to abide by the following regulations while living and working at San Juan Bautista:

(1) You are to continue weekly outpatient therapy with a therapist recommended and contacted by Dr. Les Lothstein. You should make arrangements for this as soon as possible by contacting Dr. Lothstein if he has not already contacted you.

(2) A support group is also necessary: this should be worked out between yourself and your therapist. I think this needs to be as supportive and professional as possible, at times confrontive. The members of the support group should be ones dealing with their own sexual history and in recovery from it. I think it would be best to consult with Tom West as to which type of group would be most appropriate, and I presume we will be talking about this in the future to see that we take the best possible steps now.

(3) You must have a regular spiritual director; I would suggest meetings initially twice monthly, and then possibly monthly.

(4) Your monitor will be Fr. Richard McManus, with whom you should meet in an official capacity at least twice monthly to discuss your progress and continued addressing of the issues.

(5) You may have no contact with minors, either in a pastoral or personal capacity. Any departure from this should be discussed immediately with your therapist and Fr. Richard.

I would appreciate the details of your response to these requirements (numbers 1, 2, 3) as soon as possible.

OFM CONN 1

0401

Connolly, 2

Thanks for your cooperation, Berard. These restrictions are quite standard, and I know from our talks that you see them as important also. What I am happy about is your return to the province and the great contribution you have made and will continue to make.

God bless you. Please be assured of my continued support and prayers.

Fraternally

cc. Fr. Richard McManus, OFM



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

December 8, 1992

My dear friars

May the Lord give you peace. During this Advent season and on the occasion of this great feast of our Lady, I pray that the Holy Spirit will fill your hearts with hope and courage.

With this mailing you will find enclosed the minutes of the last definitorium meeting and an additional document which is very important in the life of our fraternity.

As many of you know, over the past several months the definitorium has been grappling with allegations of the sexual abuse of minors which had occurred at our minor seminary during the post-conciliar years. I met initially with a group of about seventy concerned lay people in Santa Barbara on October 28th; since that time a smaller group of laity have been meeting to suggest approaches to the problem, and I presented to them our administrative response to the whole situation this past December 4th. It is vitally important that we respond in a clear and forthright manner to these allegations. The enclosed document outlines our response to the situation at St. Anthony's within the context of a larger plan for the whole province. It is the unanimous opinion of the definitorium that we move in this direction. In doing so, I feel that we are trying to give a good example of our own commitment to Gospel integrity.

Of course there are so many questions and sub-questions attached to this situation that it is difficult to discover how to move.

My heart goes out to all of you, and I very much appreciate the support which you have given to myself and the definitors and staff of the administration. For myself, let me mention four issues that are so clear to me.

First, I ask you please to remember with great kindness and compassion the families and victims who have been offended. These are good, Christian people; and they sincerely wish to have the Gospel proclaimed in all its fullness. We are blessed by their fidelity.

Also, I want to thank you so much for the great expressions of concern and compassion which so many of you show to our friars against whom these allegations have been made. They are our brothers and we love them. We are blessed by their presence.

OFM CONN 1

0403


St. Anthony's, 2

I am very proud of the excellent work which has been done by St. Anthony's Seminary throughout the years. Many of our finest friars have served there with distinction; they have poured their life blood into the education of young men; they have desired to create stronger members of society, better Christians, fine Catholics, and even better Franciscans. In this they have succeeded, and we friars have all basked in the glory of their work and dedication. Let us continue to affirm each other and hold fast to that which is good.

Lastly, this feast of the Immaculate Conception is so precious to ourselves as friars minor; its chief proponent was our own John Duns Scotus. Why? Well, I think in his own small way Francis viewed the world from the perspective of Love, passionate love able to create, to build, to multiply, to guide, to encompass all things; love able to take the highs and lows of existence and weave a pattern of tremendous beauty. This feast simply celebrates Yahweh's love in the Son for the servant and handmaid of us all. It is wonderful that neither the wanderings of the people nor their sins, neither any power nor force in all of existence, neither the might of the state nor the darkness of inner experience--nothing at all--was able to change this love of God for the chosen one.

My brothers, you are God's chosen ones. Let us together continue to imitate our Father Francis. Grasped by Love, we find, I think, that it overcomes all things.

Fraternally



OFM CONN 1

0404

Third party privacy

A COMPREHENSIVE APPROACH TO PROVINCIAL POLICY AND A PASTORAL RESPONSE TO INSTANCES OF SEXUAL ABUSE OF MINORS AT ST. ANTHONY'S SEMINARY

THE RELIGIOUS FRATERNITY

The sexual abuse of minors is an egregious violation of personal integrity which results in the breaking of society's most basic bonds of human loyalty and trust. It is an invasion of both the personal and familial life of the victim. I cannot express in words the sorrow that all of us feel for the victims and families. We are deeply compassionate.

When this abuse is perpetrated by a priest or religious, the offensiveness is compounded by the high regard, faith and power given to those in positions of pastoral example and leadership in the Catholic Christian community.

Knowledge of the action provokes confusion about faith, anger at the personal violation, and sows distrust in all directions. In many instances it creates a "solidarity in victimhood" between the minor, his family, and the community to which they belong. Often the violation is so fundamental that it is met with denial and incomprehension. Because defensiveness is frequently a factor, those once victimized can become twice victimized--and the cycle of violence continues. I am truly sorry if, in some ways, we have contributed to this cycle.

Vowed to the Gospel life, we friars unreservedly believe that sexual abuse cannot be tolerated in any form. Above all, we abhor the sexual abuse of children who are essentially powerless and voiceless. As a religious fraternity we must take decisive, unequivocal, effective measures to speak for those who have no voice, to tend the wounds of those in the Body of Christ who have been violated, and to begin to restore the basic trust and fidelity which have marked the close relationship between the friars and the community which received them in the bonds of friendship.

We friars must also share the pain of facing the truth about ourselves and our brothers. We publicly and firmly want to take personal and corporate responsibility for systemic changes to heal the past, address the present and plan the future. As "penitents from Assisi" and vowed peacemakers within the Church and society, we will, with your help, "turn our face like flint" to the urgent task at hand. Within our Gospel way of life we believe that our pastoral response should be dictated by the integrity of the Gospel and our covenant with you, the People of God. With your help and partnership, we seek "truth with a pastoral face."

THE PRESENTING ISSUES

In March of 1989 [REDACTED] filed charges of sexual abuse against Philip Mark Wolfe, a Franciscan priest and teacher at St. Anthony's Seminary from September 1981 to June 1984. The molestations occurred between 1983 and 1987 but, because of the statute of limitations, only the charges of Bernard Smith were dealt with.

In September of 1989 Philip Wolfe pleaded "no contest" to one count of oral copulation with a person under eighteen and was given a six month's jail sentence followed by six months in a treatment center.

Recently, in May of this year, the [REDACTED] informed the Provincial Minister that [REDACTED] a member of the Santa Barbara Boys' Choir, had been inappropriately, sexually touched by Fr. Robert Van Handel, founder of the choir and teacher at St. Anthony's Seminary from May 1975 to its closure in June 1987.

In October of this year a public letter was sent to all participants in the Boys' Choir. On October 28, during a meeting at St. Anthony's Seminary, new information surfaced, indicating that Fr. Robert's sexual abuse of minors extended into the seminary itself. Since that time, several other victims--some both members of the Boys' Choir and seminarians--

Third party privacy

PROVINCIAL POLICY AND PASTORAL RESPONSE

have come forward. In addition, past allegations, dating back many years, have come to light, along with rumors.

THE EVOLUTION OF PROVINCE POLICIES

The first Province policy concerning issues of sexual misconduct was developed by the Franciscans in 1988. Subsequent revisions in this policy have been prompted by the persistence and honest challenging by the [REDACTED] and we are indebted to them.

After meeting with the [REDACTED] in January 1990, in the wake of the dreadful first victimization, the definitorium worked on achievable goals actively and with the strongest pastoral responsibility. Many of these goals have been presented by the [REDACTED] themselves. Let me give a few examples:

For myself, I have shared the fruit of my own experience the past two years with Region VI of the Conference of Major Superiors of Men, insisted on the importance of major policy statements and reviews at that level, and spoken on the importance of correct action and attention to victims with the Committee on Priestly Life and Ministry of the National Conference of Bishops, of which I was a member for three years. Our experience has had a major effect on the English Speaking Conference of the Order of Friars Minor covering Malta, England, Canada and the United States. Our own experience in Santa Barbara, then, has had a ripple effect for the good far beyond the boundaries of the friars and Santa Barbara. The response on all of these levels has been tremendous.

Locally, this process of growth these past two years involved the entire Franciscan fraternity. Admissions' procedures were scrutinized and modified; professionals in the fields of psycho-sexual development and sexual deviancy conducted sessions for both those in formation and for the fraternity at large. After an interim policy, a clear and precise statement on sexual misconduct was adopted by the Province in January 1992. Our policy has been composed with the best psychiatric, pastoral and legal advice possible.

We see our policy and programs as developmental because, for example, the policy now in place was designed to deal with current rather than historical issues of misconduct. The most recent knowledge of past instances of abuse opens up a new chapter in our own painful growth. In all of this, we have committed ourselves to working in a comprehensive way.

COMPREHENSIVE PROVINCE POLICIES

1. Formation Programs

Aspirants to our way of life come to us by way of our Vocations' Directors. After thorough initial interviews and tentative approval, the candidates then undergo a lengthy process of discernment which includes independent and objective professional evaluation, using such instruments as the Object Relations Test, the Rocharch, hostility quotients and word association testing as well as extensive interviews covering family history, work experience, socialization patterns, psycho-sexual development and so on.

The application process is concluded with a final interview with the candidate and the independent Admissions to Formation Committee consisting of five friars. Having reviewed all the testing and other documents and consulting with the vocation directors, the Admissions Committee deliberates privately and prepares its own recommendation for each applicant. This is presented to the Provincial for final approval or rejection.

Although this is a thorough process, in the light of recent events the entire structure will be reevaluated and, if necessary, augmented through the recommendations of an independent review board.

2. Ongoing Education

In our formation program which lasts from six to nine years, we have in place extensive programs of continuing education in the areas of sexual maturation, pastoral responsibility and sexual deviancy. After final vows and admission to pastoral responsibilities as a priest or laic friar, the programs of education continue, sometimes through the local diocese and more often through the Province itself. All of these programs will likewise be reviewed by an independent board. If necessary, these also will be augmented.

3. Personnel Review

As a corporate entity the Province does not operate any educational establishments involving minors. Parish programs are regulated by the policies of each diocese in which we work. It is, however, incumbent upon us to institute an independent review of all friars involved in ministry to minors. Likewise we will review all past personnel decisions and request recommendations from the independent board so that any current policies may be corrected where they are found to be inadequate. We will insist on total cooperation and compliance with local diocesan programs and requirements in the area of youth ministry.

4. Review of Current Policies

Our current, public policies governing the sexual abuse with minors will be stringently upheld, especially those regulating the placement and ministry of offenders. Article 9 of our policies states in part:

Where appropriate, the accused will be required to undergo a psychiatric evaluation by a mental health facility specializing in sexual disorders and approved by the Provincial.

When the psychiatric evaluation has been completed, the Provincial, in consultation with the Provincial Team and, where appropriate, with legal counsel and mental health professionals, will determine whether the friar should be permitted to minister and, if so, under what circumstances...

Ordinarily, no religious against whom a serious accusation has been substantiated will be permitted to return to public ministry unless: (a) he has undergone long-term psychotherapy (including prescribed medication) and the psychotherapist has advised that he is not a threat to the public; (b) he participates in a therapy group or life management support group; (c) it is possible to adequately supervise and monitor his contacts with the public; (d) he is subject to special placement and supervision by an on-site supervisor and the Provincial or his delegate.

5. Review Board

By August 1993 the Province will establish a separate review board designed to address the above areas of concern; it will make further recommendations to the provincial administration to insure the integrity of the friars' lives and ministries as these relate to minors. This board will also deal in a continuing manner with cases of sexual misconduct with minors which may arise.

This ongoing review board will be directly under the Provincial. It will be composed of five persons: two friars and three lay specialists. Articles of procedure will be drawn up and based on the best models currently available. These articles will be reviewed by the board itself and then approved by the provincial definitorium. The definitorium explicitly commits itself to the establishment of this permanent project.

A PASTORAL PLAN FOR ST. ANTHONY'S SEMINARY

With respect to the allegations involving the conduct of certain friars at St. Anthony's Seminary, the following steps will be taken:

PROVINCIAL POLICY AND PASTORAL RESPONSE

The friars will continue to be proactive in responding to known victims and their families through the offering of counseling, the identification of local resources, personal visits and remuneration for therapy.

Because there may be victims unnamed and undiscovered as yet, a Board of Inquiry (see below) will send a letter to all known students from the school year 1964-1965 to the time of the seminary's closure. While maintaining appropriate confidentiality and sensitivity, the Board will thus be able to identify the victims of sexual abuse, the perpetrators of the abuse and the credibility of the allegations. Established procedures will be followed to determine the truth as best as possible (outside of a court of law).

A formal Board of Inquiry will be established by the Province of St. Barbara (January 1993). The board will function independently of the Provincial administration and will report directly to the Provincial Minister. The board has an essentially pastoral purpose, acting for the good of the victims, the well being of the community and the friars, and the integrity of the Church. It is fact-finding, consultative and advisory, not adversarial or adjudicative. This board will process the results of past pupil contacts and investigate the allegations of sexual misconduct with minors and related issues at the seminary. It will follow Province policies on active care for victims.

This Board of Inquiry will have five members: an outside friar skilled in counseling and issues of sexual abuse (Fr. Dismas Bonner, O.F.M.); a professional layman (Dr. Eugene Merlin) with the same qualifications; three other members, one of whom will be a recovering victim and/or parent of a victim.

A draft of procedures will be drawn up under the authority of the Provincial Minister and the Board of Inquiry before final adoption in consultation with the Provincial Minister.

With respect to confidentiality, the "Chicago Policy Regarding Clerical Misconduct with Minors" principles will be invoked. Final recommendations and observations to the Provincial Minister will, respecting confidentiality, be made public jointly by the Board of Inquiry and the Provincial Minister.

After sufficient review, a friar established to have been an offender against minors will not return to active public ministry without thorough and enforceable guidelines as recommended by the Board of Inquiry.

In the course of the next five months, the friars will sponsor a series of fora to educate both the Franciscans and the local faith community on issues of child abuse and its implications; the spiritual dimensions and meaning for the church; and the identification of local resources in the area. These goals may be accomplished by a day of recollection or weekend retreat, workshops and study groups.

The Province will work with the archdiocese in sponsoring a workshop for the broader Catholic community in Santa Barbara for the purposes of education and community information.

December 4, 1992

OFM CONN 1

0408

4

SAINT FRANCIS



RETREAT CENTER

February 11, 1994

Dear [REDACTED]

This is sort of a formal thank you note.

You know my appreciation for all you have gone through in my behalf. I guess I was especially touched when I saw it first hand in Spokane. All I can say is Thanks! Also, it was good that you "encouraged" me to visit the Poor Ladies with you.

My feelings still have not caught up with me. There is no winner in this thing and maybe I have to stop looking for one. I still have deep feelings from the undeserved goodness of the friars in my behalf. They are such good men. I have the fear of someone else's memory being enhanced with the publicity of these cases. I am tormented by fears in my own life. I know this "minimum security prison" is not of San Juan but within my own mind.

Third party privacy

I wish [REDACTED] would have consented to see me.apist/Patie

Psychotherapist/Patient Privilege

Still, [REDACTED], a weight has been lifted and I even found myself singing the other morning.

Regarding my health, which I believe is tied up with the rest of my life. The hip bone and the thigh bone.....!

Yesterday I had a good talk with Dr. Yanagihara, the oncologist. (No, [REDACTED] I didn't pick him out!). He is well respected in the cancer field in this area. I asked him what my five-year prospects are, being a diabetic and all.

It seems I have a 60/70% chance of survival, which I believe is the same as crossing the street - in Mexico. There is a 40% chance the sarcoma may return and a 20% chance it may come to my chest. Percentages are what they are and I can live with them. Besides in five years I'll be 71 and we'll be one year from the millennium.

My right leg, my "bad one," isn't any better. It's a deteriorating kneecap. Was going to get it fixed this year but I - and I'm sure the insurance company - will wait for

OFM CONN 1

0409

SAINT FRANCIS



RETREAT CENTER

February 11, 1994

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I wish , would have consented to see me. Wendy, my psychologist, said her refusal could stem from the fact she may have painted a devil face on me and would rather keep this image rather than the person I really am.

Still, Joe, a weight has been lifted and I even found myself singing the other morning.

Regarding my health, which I believe is tied up with the rest of my life. The hip bone and the thigh bone....!

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OFM CONN 1

0409

SAINT FRANCIS



RETREAT CENTER

another year.

I know I have a way to go in life's journey. I admit a lot of disquietude at Lester's coming, the "magister laicorum" and those ghosts. However, I know the facts of life and the burden of the definitorium. I'll live through it and I believe I am becoming a better friar for it. Without reminders, difficult as they are, would I have even thought of the contemplative dimension of our life. I have so far to go.

My mind, with the exception of a misfiring synapse or two, is doing fairly well. I can find the airport!

Thanks again, [REDACTED]

Peace!

Berry

OFM CONN 1

0410



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

Berard Connolly, OFM
St. Francis Retreat
Box 1070
San Juan Bautista
95045

April 12, 1993

Dear Berard

Peace and good. Happy Easter. It was good to see you for the couple of days during Holy Week; I appreciate very much your solicitude forme. Please be assured of my prayers and support. These are difficult times, but I will do my best to be with you. If there is anything I can do, don't hesitate to ask.

Enclosed please find a release form which is self-explanatory. I am passing this to you because the Board of Inquiry has asked me to do so. I want to make it clear that you are not obliged to sign this. The Code of Canon Law is very explicit on this point: 630.5: "Members are to approach superiors with trust, to whom they can express their minds freely and willingly. However, superiors are forbidden to induce their subjects in any way whatever to make a manifestation of conscience to them."

As far as I know, the Board of Inquiry has not received any information regarding SAS students and yourself, beyond the back rubbing which you had mentioned to me. Signing the release has advantages and disadvantages, which I am sure you can realize. I think the Board simply wants to communicate what information they do have, and then receive some indication of the course of your treatment.

Please let me know what you decide. I would suggest you talk it over with Wendy or Lothstein. I will support you in whatever decision you make.

Faternally



OFM CONN 1

0411

Third party privacy

MONDAY MEN'S STAG

4-6-93

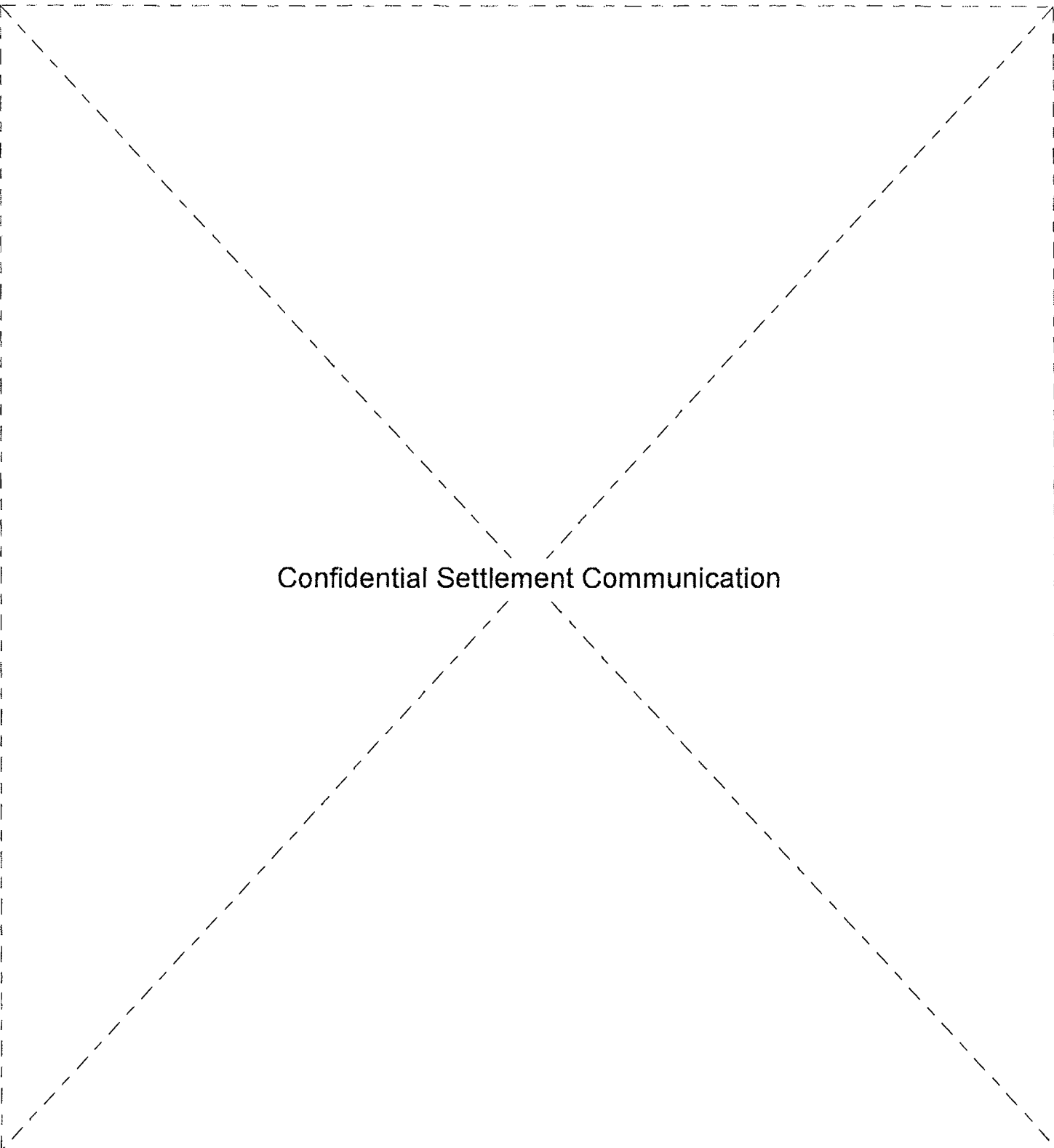
ABE P. 646-8183
ALAN C. 422-4649 H 899-7576 W
ANDREW 899-0150
BEN P. 899-7567 H 649-3277 W
BILL C. 373-1063
BILL S. 625-0776 H 649-8006 W
BILL V. 422-1631
BOB 624-6241
BOB M. 372-8813
BRODUS 663-5005 H 671-0604 W
BRUCE 637-9691
DAN W. 373-1910
DAVID T. 899-1703
DAVID W. 372-0356 H 655-8114 W
DON 625-5997
DOUG S. 373-0637 H 372-6792 W
DOUG W. 655-9642
ED B. 443-0743
ELIOT 373-0808
GENE I. 646-1220
GEORGE B. 1-595-0515
GEORGE Y. 758-8377 H 422-8825 W
GLENN 372-3092 H 624-2299 W
GREG G. 422-0423
HAROLD 375-8675
IRA F. 375-2076 H 625-5840 W
JACK 753-2500 H 728-6187 W
JIM E. 422-7024
JIM F. 375-1803 H 375-3577 W
JOSH J. 375-4494 H 394-8550 W
KIRK 394-1715 H 373-2991 O
LARRY M. 883-1430

LOU H. 484-9814 H 675-2745 W
MARK 671-2774
MICHAEL M. 649-5350 H 372-8292 W
MICHAEL N. 624-2209 H 649-0957 W
MIKE M. 394-0129 H 449-8471 W
MIKE S. 649-6835 H 375-3577 W
PETE 646-2661
PHIL M. 375-7780
RALPH 758-3061 H 422-9021 W
RAMIRO 422-8527
RANDY B. 625-6395 H 375-6410 W
ROB 624-0244
ROBERT 484-5079
ROGER B. 443-4671
SCOTT 625-3546
SCOTT S. 655-3166 H 649-1808 W
SEAN 649-8045
STEVE A. 655-8560
TIM D. 625-9971
WALT S. 375-0240 H 384-3550 W
WILL R. 899-5455 H 647-4339
YUTAKA K. 484-1491 H 646-2095 W

OFM CONN 1

0412

Bates Number 413 was removed by the Plaintiffs at the request of the Franciscans.



Confidential Settlement Communication

OFM CONN 1
0414

Bates Numbers 415-420 were removed by the Plaintiffs at the request of the Franciscans.

WENDY SINCLAIR-BROWN, Ph.D.

PERMISSION TO RELEASE INFORMATION

I hereby authorize and request [REDACTED] to release confidential professional information, including personal, psychological, psychiatric, and medical records and opinions, resulting from my contacts with them, to Wendy Sinclair-Brown, LMFT, Ph.D. The specific information is as follows:

1. any and all documents pertaining to my hospitalization at the Institute for Living.
2. other information pertinent to my case in my file.

I understand that I have no obligation whatsoever to disclose the requested information and that I may revoke this consent at any time by informing any of the above noted individuals. Further, the above consent shall expire after a period of 90 days from the date of my signature below.

In consideration of this consent, I hereby release the above parties from any and all liability arising therefrom.

Signature: Grace K. Connolly Date: 1/24/94

Bates Number 422 was removed by the Plaintiffs at the request of the Franciscans.

Third party pri.

COPY RECEIVED THIS

DAY OF

12 19 94

By: T. D. Proaty

ATTORNEY FOR

J. A.

RECEIVED

DEC 13 1993

ETTER & McMAHON, P.S.

ANTONIETTI

RECEIVED

JAN 13 1994

FOR YOUR INFORMATION
ETTER & McMAHON, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

a single woman,

Plaintiff,

vs.

BROTHER BERARD CONNELLY, a
Franciscan Brother; THE CATHOLIC
DIOCESE OF SPOKANE; THE CATHOLIC
BISHOP OF SPOKANE; THE FRANCISCAN
FRIARS, PROVINCE OF SAINT BARBARA;
AND THE ROMAN CATHOLIC CHURCH OF
THE PAPACY,

Defendants.

NO. 92-205445-5

PLAINTIFF'S REQUESTS
FOR ADMISSION
PROPOUNDED TO
DEFENDANT BROTHER
BERARD CONNELLY

TO: BROTHER BERARD CONNELLY, defendant
AND TO: WILLIAM F. ETTER, your attorney

Plaintiff herewith submits the following Requests for
Admission to be answered separately and fully under oath
within thirty (30) days from the date of service of said
Requests upon you.

IN ACCORDANCE WITH CIVIL RULE 36(a), EACH REQUEST FOR
ADMISSION IS CONSIDERED ADMITTED UNLESS, WITHIN THIRTY (30)
DAYS AFTER SERVICE OF THE REQUEST FOR ADMISSION, OR WITHIN
SUCH SHORTER OR LONGER TIME AS THE COURT MAY ALLOW, THE PARTY
TO WHOM THE REQUEST IS DIRECTED SERVES UPON THE PARTY
REQUESTING THE ADMISSION A WRITTEN ANSWER OR OBJECTION
ADDRESSED TO THE MATTER, SIGNED BY THE PARTY OR BY HIS
ATTORNEY. IF OBJECTION IS MADE, THE REASONS THEREFOR SHALL BE
STATED. THE ANSWER SHALL SPECIFICALLY DENY THE MATTER OR SET
FORTH IN DETAIL THE REASONS WHY THE ANSWERING PARTY CANNOT
TRUTHFULLY ADMIT OR DENY THE MATTER.

DEFINITIONS

In this First Set of Requests for Admission, the
definitions of certain words and phrases are set forth below.
When used in this First Set of Requests for Admission, these
words and phrases are to have the meanings set forth below,
unless otherwise specified in the individual Requests.

A. "Person": "person" means any natural person, firm,

REQUESTS FOR ADMISSION - 1

OFM CONN 1

0423

Antonietti P.S.
ATTORNEY AT LAW

111 West Cataldo, Suite 210
Spokane, WA 99201

partnership, association, joint venture, corporation, trust,
estate or any form of legal entity.

B. "You" and "Your": "You" and "Your" refer to
defendant Brother Berard Connolly.

DATED this 10 day of December, 1993.

JOAN L. ANTONIETTI, P.S.

Joan L. Antonietti
Joan L. Antonietti
WSBA #13795
Attorney for Plaintiff

REQUEST FOR ADMISSION NO. 1: Admit that you sexually abused,
plaintiff on parish premises.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 2: Admit that you sexually abused
Plaintiff during parish related activities.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 3: Admit that you sexually abused
Plaintiff.

RESPONSE: Admit.

REQUESTS FOR ADMISSION - 2

OFM CONN 1
0424

Joan L. Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

1 REQUEST FOR ADMISSION NO. 4: Admit that you sexually abused
2 parishioners other than Plaintiff on parish premises.

3 RESPONSE: Deny.

4
5 REQUEST FOR ADMISSION NO. 5: Admit that you sexually abused
6 parishioners other than Plaintiff during parish related
7 activities.

8 RESPONSE: Deny.

9
10
11 REQUEST FOR ADMISSION NO. 6: Admit that you have sexually
12 abused parishioners other than Plaintiff.

13 RESPONSE: Deny.

14
15
16 REQUEST FOR ADMISSION NO. 7: Admit that you sexually abused
17 students other than Plaintiff.

18 RESPONSE: Deny.

19
20
21 REQUEST FOR ADMISSION NO. 8: Admit that you sexually abused
22 students other than Plaintiff on parish premises.

23 RESPONSE: Deny.

24
25 REQUESTS FOR ADMISSION - 3

OFM CONN 1
0425

JOANNE **Antonietti P.S.**
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509.325.7777

1 REQUEST OF ADMISSION NO. 9: Admit that you sexually abused
2 students other than Plaintiff during parish related
3 activities.

4 RESPONSE: Deny.

5
6 REQUEST FOR ADMISSION NO. 10: Admit that other brothers and/or
7 priests were aware of certain inappropriate activities and
8 conduct on the part of yourself directed toward your students
9 and/or parishioners.

10 RESPONSE: Deny.

11
12
13 REQUEST FOR ADMISSION NO. 11: Admit that other brothers
14 and/or priests should have been aware of certain inappropriate
15 activities and conduct on the part of yourself directed toward
16 your students and/or parishioners.

17 RESPONSE: Deny.

18
19
20 REQUEST FOR ADMISSION NO. 12: Admit that other brothers
21 and/or priests were aware of certain inappropriate activities
22 and conduct on the part of yourself directed toward Plaintiff.

23 RESPONSE: Deny.
24
25

REQUESTS FOR ADMISSION - 4

OFM CONN 1
0426


ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 REQUEST FOR ADMISSION NO. 13: Admit that other brothers
2 and/or priests should have been aware of certain inappropriate
3 activities and conduct on the part of yourself directed toward
4 Plaintiff.

5 RESPONSE: Deny.

6
7 REQUEST FOR ADMISSION NO. 14: Admit that you assaulted and
8 battered plaintiff?

9 RESPONSE: Deny.

10
11
12 REQUEST FOR ADMISSION NO. 15: Admit that your acts directed
13 towards Plaintiff constituted extreme and outrageous conduct?

14 RESPONSE: Deny.

15
16
17 REQUEST FOR ADMISSION NO. 16: Admit that your outrageous
18 conduct intentionally, recklessly and/or negligently caused
19 plaintiff to suffer severe emotional and mental distress?

20 RESPONSE: Deny.

21
22
23 REQUEST FOR ADMISSION NO. 17: Admit that you violated
24 plaintiff's right to enjoy her relationship with her family?

25 RESPONSE: Deny.

REQUESTS FOR ADMISSION - 5

OFM CONN 1
0427

JOAN L. Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

Third party privacy

1 REQUEST FOR ADMISSION NO. 18: Admit that due to your
2 outrageous behavior, that plaintiff has suffered the loss of
3 her marriage to [REDACTED]

4 RESPONSE: Deny.
5

6
7 REQUEST FOR ADMISSION NO. 19: Admit that due to your
8 outrageous behavior, that plaintiff has suffered the loss of
9 her religious faith.

10 RESPONSE: Deny.
11

12
13 REQUEST FOR ADMISSION NO. 20: Admit that as a result of your
14 sexual abuse, plaintiff has suffered physical pain and
15 suffering and distress.

16 RESPONSE: Deny.
17

18
19
20 REQUEST FOR ADMISSION NO. 21: Admit that as a result of your
21 sexual abuse, plaintiff has suffered psychological pain and
22 suffering and distress.

23 RESPONSE: Deny.
24
25

REQUESTS FOR ADMISSION - 6

OFM CONN 1
0428

Joanne **Antonietti P.S.**
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

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REQUEST FOR ADMISSION NO. 22: Admit that as a result of your sexual abuse, plaintiff has suffered emotional pain and suffering and distress.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 23: Admit that as a result of your sexual abuse, plaintiff has suffered humiliation.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 24: Admit that as a result of your sexual abuse, plaintiff has suffered anxiety.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 25: Admit that as a result of your sexual abuse that plaintiff has had to seek out psychological treatment and therapy?

RESPONSE: Deny.

1 REQUEST FOR ADMISSION NO. 26: Admit that you touched
2 plaintiff inappropriately without her consent.

3 RESPONSE: Deny.

4
5 REQUEST FOR ADMISSION NO. 27: Admit that the Franciscan Friars
6 Province of St. Barbara had notice of your propensity to
7 behave inappropriately, sexually either prior to or during
8 your sexual abuse of plaintiff.

9 RESPONSE: Deny.

10
11
12 REQUEST FOR ADMISSION NO. 28: Admit that the Catholic Diocese
13 of Spokane had notice of your propensity to behave
14 inappropriately, sexually, either prior to or during your
15 sexual abuse of plaintiff.

16 RESPONSE: Deny.

17
18
19
20 REQUEST FOR ADMISSION NO. 29: Admit that the Catholic Bishop
21 of Spokane had notice of your propensity to behave
22 inappropriately, sexually, either prior to or during you
23 sexual abuse of plaintiff.

24 RESPONSE: Deny.

25
REQUESTS FOR ADMISSION - 8

OFM CONN 1
0430

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/325-7333 FAX 509/325-7334

1
2 REQUEST FOR ADMISSION NO. 30: Admit that the Franciscan Friars
3 Province of St. Barbara had received complaints regarding your
4 inappropriate conduct either prior to or during your sexual
5 abuse of plaintiff.

6 RESPONSE: Deny.

7
8
9 REQUEST FOR ADMISSION NO. 31: Admit that Catholic Diocese of
10 Spokane had received complaints regarding your inappropriate
11 conduct either prior to or during your sexual abuse of
12 plaintiff.

13 RESPONSE: Deny.

14
15
16 REQUEST FOR ADMISSION NO. 32: Admit that the Catholic Bishop
17 of Spokane had received complaints regarding your
18 inappropriate conduct either prior to or during your sexual
19 abuse of plaintiff.

20 RESPONSE: Deny.

JAN 12 1994

947
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FAX

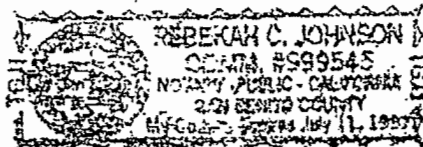
BROTHER JOHN CONNELLY, being first duly sworn upon oath, deposes and says:

Answers to the foregoing Requests for
 Answers thereto, and state that they are
 to the best of my knowledge.

my knowledge.

Brother Bernard Connolly

SUBSCRIBED AND SWORN TO before me this 12th day of January, 1994.



Rebekah Johnson
NOTARY PUBLIC in and for
the State of California
residing at Hollister.
My commission expires:
July 11, 1997

The undersigned attorney for the party responding to the above discovery matters signs this response in compliance with Rule 26(g) of the Superior Court Civil Rules.

DATED this 12th day of Jan., 1994.

William F. Etter
William F. Etter WSBA # 091582

REQUESTS FOR ADMISSION - 10

OFM CONN 1
0432

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210

Third party privacy

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DEC 13 1993

MORRISON & LEVEQUE, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[REDACTED] a single woman,

Plaintiff,

NO. 92-205445-5

vs.

BROTHER BERARD CONNELLY, a
 Franciscan Brother; THE CATHOLIC
 DIOCESE OF SPOKANE; THE CATHOLIC
 BISHOP OF SPOKANE; THE FRANCISCAN
 FRIARS PROVINCE OF SAINT BARBARA;
 AND THE ROMAN CATHOLIC CHURCH OF
 THE PAPACY,

PLAINTIFF'S FIRST SET OF
 INTERROGATORIES AND
 REQUESTS FOR PRODUCTION
 OF DOCUMENTS PROPOUNDED
 TO DEFENDANT THE
 CATHOLIC BISHOP OF
 SPOKANE

AND RESPONSES THERETO

Defendants.

TO: DEFENDANT THE CATHOLIC BISHOP OF SPOKANE and your attorney,
 Ronald G. Morrison

Pursuant to Rules 26, 33 and 34 of the Civil Rules for Superior Court of the State of Washington, the Plaintiff submits the following Interrogatories and Requests for Production of Documents to be answered separately and completely under oath within thirty (30) days of the service thereof upon you. In answering, you are required to furnish such information as is available to you, not merely the information you know of your personal knowledge. This is intended to include any information in the possession of your agents, attorneys, or any investigators for you.

COURT RULES REQUIRE THAT THE ANSWERS BE PRECEDED BY THE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND THUS EXTRA COPIES OF THESE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS ARE BEING SERVED UPON YOU IN ORDER TO EXPEDITE THE ANSWERING THEREOF. YOU MAY TYPE YOUR ANSWERS IMMEDIATELY AFTER THE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND THUS AVOID RETYPING THE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.

THESE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS ARE CONTINUING IN NATURE, AND THE PLAINTIFF HEREBY DEMANDS THAT ANY ADDITIONAL INFORMATION COMING INTO YOUR POSSESSION OR YOUR COUNSEL'S OR AGENTS POSSESSION THAT WOULD CHANGE OR ADD TO YOUR ANSWERS IN ANY WAY BE PROMPTLY FURNISHED TO THE UNDERSIGNED, IN ANY EVENT, NO LATER THAN THIRTY (30) DAYS AFTER RECEIPT OF SUCH INFORMATION.

INTERROGATORIES AND REQUESTS - 1

OFM CONN 1

0433

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 111 West Cataldo, Suite 210
 Spokane, WA 99201
 509-325-7333 FAX 509-325-7334

Moreover, pursuant to Rules 26 and 34 of the Civil Rules for Superior Court of the State of Washington, the Plaintiff herein requests that you produce and permit Plaintiff to copy documents described below which are now in your or your attorneys or agents possession, custody and/or control.

Unless otherwise mutually agreed to, inspection and/or copying shall take place at the offices of the Plaintiff's attorney, Joan L. Antonietti, P.S., W. 111 Cataldo, Suite 210, Spokane, WA 99201, during regular business hours until completed, not later than thirty (30) days from the date of service of these Requests. Visual inspection shall be made by the Plaintiff's attorneys, and copying shall be done by photocopying or other appropriate means.

DEFINITIONS

As used in these interrogatories, the following terms shall have the following meanings:

1. The term "you" means yourself and any of your agents, employees, representatives, predecessors and successors in interest, any and all other persons or entities acting on your behalf.

2. The term "and" and "or" shall, unless the context clearly indicates otherwise, embrace both the conjunctive and disjunctive.

3. In construing these interrogatories, the singular of each term shall include the plural, and the plural shall include the singular, and a masculine, feminine or neuter pronoun shall not exclude the other genders.

4. The term "document" means all written, graphic, or printed matter of any kind, however produced or reproduced, including all originals, drafts, working papers, and non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, and electronic, mechanical or electrical records or representations of any kind, transacted through detection devices into reasonably useable form. The term "document" includes, but is not limited to, papers, books, patents, book entries, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, cables, telexes or telefax messages, memoranda, notes, data, notation, work papers, inter-office communications, inter-departmental communications, minutes, reports and records of any communications (including telephone or other conversations, interviews, conferences, or committee or other meetings),

INTERROGATORIES AND REQUESTS - 2

OEM CONN 1

0434

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 affidavits, statements, summaries, opinions, reports, studies,
2 analyses, formulas, plans, specifications, contracts,
3 licenses, agreements, offers, acceptances, journals, books or
4 other records of accounts, summaries of accounts, bills,
5 receipts, balance sheets, income statements, advertisements,
6 desk calendars, appointment books, diaries, lists,
7 tabulations, charts, graphs, maps, surveys, sound recordings,
8 computer records or impressions, microfilm, and all other
9 records kept by electronic, photographic, or mechanical means,
10 and things similar to any of the foregoing, however
11 denominated.

12 5. The term "all documents" shall mean every document,
13 as defined above, whether an original or a copy, which is or
14 has been in your possession, custody, or control.

15 6. The term "person" includes any natural person, firm,
16 association, partnership and joint venture corporation, and
17 any other form of legal entity, and any city, state or federal
18 governmental entity or any agency, board, or court thereof.

19 7. The term "identify" means, with respect to a
20 document, to state its title, identifying number, type (e.g.,
21 letter, inter-office memorandum, etc.), date, author,
22 addressee, signatories, recipients, present location,
23 custodian, subject matter, and any other identifying
24 characteristics.

25 8. The term "identify" means, with respect to a person,
to state his or her full name, present or last known residence
address and phone number; present or last known business
address and phone number; present employer, job title,
responsibilities and duties; prior experiences and background,
including tenure in each title or position held to date; and
previous job title, responsibilities, and duties; and employer
and business address at the date of the event or transaction
referred to.

9. The term "identify" means, with respect to an oral
communication, to state the date of oral communication and the
place where it occurred, the persons present during such
communication, the person to whom such oral communication was
directed, the person who made such communication, and the
means by which such communication was transmitted (i.e., in
person, by recorded message, or by telephone).

10. The term "relate," "relating to," or "related to"
means directly or indirectly referring to, pertaining to,
discussing, describing, commenting on, constituting,
evidencing, referencing, comprising, or reflecting upon the
stated subject, in whole or in part.

INTERROGATORIES AND REQUESTS - 3

OFM CONN 1

0435

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

INSTRUCTIONS

1. These interrogatories and requests are intended to be continuing in nature, and any information which may be discovered by you subsequent to the service and filing of your answers and responses should be brought to the attention of the inquiring party, through supplemental answers and responses, within a reasonable time following discovery (30 days). If such responses are not furnished, this party will move at the time of trial to exclude from evidence any requested information not so furnished.

2. Each interrogatory and each subparagraph of each interrogatory is to be fully and separately answered, in writing, and under oath. Before each response is given, the paragraph and subparagraph number of the interrogatory to which the answer or response relates is to be set forth.

3. The answer to each interrogatory and response to each request for production of documents shall include such knowledge as is within your custody, possession or control or readily obtained by you including knowledge within the custody, possession or control of your attorneys, agents, and other representatives.

4. If you refuse to answer any interrogatory or request for production of documents, in whole or in part, identify the basis of your refusal to answer, including any claim of privilege, in sufficient detail so as to permit the Court to adjudicate the validity of your refusal to answer.

5. With respect to any interrogatory or request for production of documents contained herein, if you are able to provide some, but not all, of the information requested, provide such information as you can and specifically identify each item as to which you do not have the sufficient information to fully respond.

6. We have attempted to provide you with sufficient space under each interrogatory and request for production to state your answer or response. If the space provided is insufficient, please continue your answer or response on a separate sheet, and attach that sheet to the copies of this pleading which you return to us.

INTERROGATORIES AND REQUESTS - 4

OFM CONN 1

0436

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509/ 325-7330 • FAX 325-7331

the Catholic Bishop of Spokane, by stating as follows:

- (a) Their name and title;
- (b) Business address; and
- (c) Business and home telephone number.

ANSWER:

Father John Steiner is the present Vicar General and the custodian of all diocesan records. The Diocese, however, has no "personnel records" for Brother Berard Connelly. All diocesan records are kept at the Chancery which is located at W. 1023 Riverside, Spokane, WA. Father Steiner's office is in the Chancery, and his phone number is 456-7100.

REQUEST FOR PRODUCTION NO. 1: Please produce all personnel records, other documents and/or files regarding or which in any manner relate to Brother Berard Connelly.

RESPONSE:

There are no personnel records or specific files regarding Brother Berard Connelly, but records in which he is mentioned are available for inspection at the law office of Ronald G. Morrison at any mutually convenient time.

INTERROGATORY NO. 3: Please identify any persons who acted in a supervisory capacity over Brother Berard Connelly for the Catholic Bishop of Spokane by stating their:

- (a) Name, address and telephone number;
- (b) Title at present and while they supervised Brother

INTERROGATORIES AND REQUESTS - 6

OFM CONN 1
0437

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Spokane, WA 99201
509.325.7320 FAX 509.325.7324

Connelly; and

(c) Dates during which they supervised Brother Berard Connelly.

ANSWER:

No individual on behalf of the Diocese acted in any supervisory capacity over Brother Berard Connelly. He was presumably subject to the supervision and direction of his superiors within the Franciscan Friars, Province of Saint Barbara.

INTERROGATORY NO. 4: Please provide a brief description of Brother Berard Connelly's duties and responsibilities while he was working in Spokane, Washington and set forth relevant dates, if his duties changed during that period of time.

ANSWER:

Brother Berard Connelly's duties while he was in Spokane were dictated solely by the needs of the Franciscan Friars here in Spokane and Brother Berard's superiors within the Province of Saint Barbara. I am uncertain what those duties may have been or whether they changed at all during his stay in Spokane.

INTERROGATORIES AND REQUESTS - 7

OFM CONN 1
0438

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ATTORNEY AT LAW
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Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

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5
6 INTERROGATORY NO. 5 : Has Brother Berard Connelly ever
7 been requested, by the Catholic Bishop of Spokane, to undergo
8 counseling, evaluation or treatment? If your answer is in the
9 affirmative, please state:

10 (a) The name, address and phone number of each
11 counselor, evaluator, psychologist, or psychiatrist who
12 has seen Brother Berard Connelly pursuant to your
13 request;

14 (b) The reasons why you requested Brother Berard
15 Connelly to undergo counseling, evaluation or treatment;
16 and

17 (c) The dates upon which you requested Brother Berard
18 Connelly to undergo counseling, evaluation or treatment.

19 ANSWER:

20 No.
21
22
23
24
25

INTERROGATORIES AND REQUESTS - 8

OFM CONN 1
0439

Antoniotti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509.325.7330 • FAX 509.325.7334

1 INTERROGATORY NO. 6: Have there been any complaints,
2 whether formal or informal, in any format including, but not
3 limited to letter, memo, verbal complaint or legal documents,
4 lodged or filed against Brother Berard Connolly for any reason
5 whatsoever?

6 ANSWER:

7 Not to my knowledge.
8
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17

18 INTERROGATORY NO. 7: If your answer to the immediately
19 preceding interrogatory is in the affirmative, please state:

- 20 (a) The nature of the complaint(s);
21 (b) The date on which the complaint was made or filed;
22 (c) Identify all persons who have knowledge of the
23 complaint by stating their name, address and phone
24 number; and
25 (d) How the complaint was resolved if at all.

INTERROGATORIES AND REQUESTS - 9

OFM CONN 1
0440

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

ANSWER:

N/A.

REQUEST FOR PRODUCTION NO. 2: Please provide copies of all documents which in any manner relate to any complaint identified in response to the preceding interrogatory.

RESPONSE:

N/A.

INTERROGATORY NO. 8: Have there been any complaints, whether formal or informal, in any format including but not limited to letter, memo, verbal complaint or legal documents, lodged or filed against any Catholic priest or brother who resided or worked in Spokane, Washington either prior to or during the time Brother Berard Connelly worked in Spokane,

INTERROGATORIES AND REQUESTS - 10

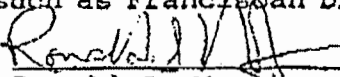
OFM CONN 1
0441

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

Washington which were based on inappropriate conduct.

ANSWER:

Objection. This Interrogatory is overly broad and beyond the scope of permissible discovery. It is also unduly burdensome because it would require a search of all diocesan records from the time the first Bishop of Spokane was installed. In addition, the Bishop's response to complaints regarding a diocesan priest granted faculties in this Diocese would not be relevant to the Bishop's response to complaints regarding other religious ministering within the geographical boundaries of the Spokane Diocese, such as Franciscan brothers like Brother Berard Connelly.


Ronald G. Morrison

INTERROGATORY NO. 9: If your answer to the immediately preceding interrogatory is in the affirmative, please state:

- (a) The nature of the complaint(s);
- (b) The date on which the complaint was made or filed;
- (c) Identify all persons who have knowledge of the complaint by stating their name, address and phone number; and
- (d) How the complaint was resolved, if at all.

ANSWER:

See objection to Interrogatory No. 8.

INTERROGATORIES AND REQUESTS - 11

OFM CONN 1
0442


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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane WA 99201

1 REQUEST FOR PRODUCTION NO. 3: Please provide copies of
2 all documents which in any manner relate to any complaint
3 identified in response to the preceding interrogatory.

4 RESPONSE:

5 See objection to Interrogatory No. 8.
6
7
8

9 INTERROGATORY NO. 10: If you currently are or have been
10 a party to any litigation other than this lawsuit arising out
11 of the sexual abuse of the complaining party; state for each:

- 12 (a) The nature of the suit;
13 (b) The date, court, place and cause number for each
14 prior action;
15 (c) The full names and last known addresses of all
16 parties of each prior suit and their attorneys;
17 (d) The present status of each suit; and
18 (e) If concluded, the result or disposition of each
19 suit.

20 ANSWER:

- 21 1. [REDACTED] v. Bishop of Spokane:
22 a.-c. See attached;
23 d.-e. [REDACTED] claim settled - [REDACTED] claim pending.
24 2. [REDACTED] v. Fontenot:
25 a.-c. See attached;
d.-e. Dismissed by summary judgment as to Bishop of
Spokane.
3. [REDACTED] v. Beaver;
a.-c. See attached;
d.-e. Settled.

INTERROGATORIES AND REQUESTS - 12

OFM CONN 1

0443

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111 West Cataldo, Suite 210
Spokane, WA 99201
509.325.7330 FAX 509.325.7334

1
2
3 INTERROGATORY NO. 11: Please state whether or not the
4 Catholic Bishop of Spokane maintained any procedures or
5 policies regarding supervision of parish students and/or
6 children while on or at parish grounds, schools, functions
7 and/or activities during the period of time that Brother
8 Berard Connolly was working in Spokane County, Washington.

9
10 ANSWER:

11 Not for non-certified personnel.
12
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20 INTERROGATORY NO. 12: If your answer to the immediately
21 preceding interrogatory is in the affirmative, please state:

- 22 (a) The date the policy was implemented;
23 (b) Whether or not any training was provided regarding
24 said policy;
25 (c) Whether or not the policy or procedure provides any

INTERROGATORIES AND REQUESTS - 13

OFM CONN 1
0444

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direction to persons who witness inappropriate conduct
directed toward parish students and/or children; and
(d) To whom the policy was disseminated.

ANSWER:

N/A.

REQUEST FOR PRODUCTION NO. 4: Please produce copies of
any policy identified in response to the immediately preceding
interrogatory.

RESPONSE:

N/A.

INTERROGATORY NO. 13: Please state whether or not the
Catholic Bishop of Spokane maintained any policies or
procedures regarding inappropriate sexual conduct on the part
of priests or brothers while Brother Berard Connelly was
working in Spokane, Washington.

INTERROGATORIES AND REQUESTS - 14

OEM CONN 1
0445

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

ANSWER:

At the time in question, the only policies or procedures regarding inappropriate conduct by priests would have been set forth in Canon law.

INTERROGATORY NO. 14: If your answer to the immediately preceding interrogatory is in the affirmative, please state:

- (a) The date the policy was implemented;
- (b) Whether or not any training was provided regarding said policy;
- (c) Whether or not the policy or procedure provides any direction to persons who witness inappropriate conduct; and
- (d) To whom the policy was disseminated.

ANSWER:

Objection. This information is equally available to the plaintiff. See the Code of Canon Law.


Ronald G. Morrison

INTERROGATORIES AND REQUESTS - 15

OFM CONN 1

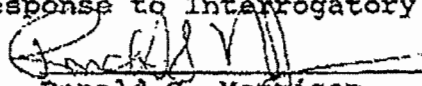
0446


ANTONIOTTI P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1
2 REQUEST FOR PRODUCTION NO. 5: Please produce copies of
3 any policy identified in response to the immediately preceding
4 interrogatory.

5 RESPONSE:

6 Objection. See response to Interrogatory No. 14.

7 
8 Ronald G. Morrison
9
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11

12 INTERROGATORY NO. 15: Identify all persons who are
13 witnesses to any of the incidents complained of by Plaintiff
14 by setting forth their:

- 15 (a) Name, address, and telephone number; and
16 (b) The substance of what they witnessed.

17 ANSWER:

18 This defendant is aware of no witnesses to the
19 alleged abuse other than those previously disclosed by the
20 plaintiff.
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25 INTERROGATORY NO. 16: Identify all witnesses you intend

INTERROGATORIES AND REQUESTS - 16

OFM CONN 1
0447

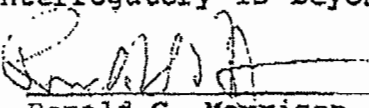
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PH 325-7330 • FAX 325-7334

to call at trial by setting forth their:

- (a) Name, address, and telephone number; and
- (b) A summary of their expected testimony.

ANSWER:

Objection. This Interrogatory is beyond the scope of permissible discovery.


Ronald G. Morrison

INTERROGATORY NO. 17: Identify all expert witnesses you intend to call at trial by setting forth their:

- (a) Name, address, and telephone number and their title;
- (b) The subject matter on which the expert is expected to testify;
- (c) A summary of their expected testimony; and
- (d) The basis for their expected testimony.

ANSWER:

A determination regarding expert witnesses who will be testifying at trial has not yet been made, but this response will be supplemented as soon as this determination has been made.

INTERROGATORIES AND REQUESTS - 17

OEM CONN 1
0448

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 INTERROGATORY NO. 18: Please state the reasons why
2 Brother Berard Connelly ceased working in Spokane, Washington.

3 ANSWER:

4 This is unknown, but presumably his superiors
5 in the Franciscan community felt his services could be better
6 utilized elsewhere.
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INTERROGATORIES AND REQUESTS - 18

OFM CONN 1

0449

Antoniotti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 STATE OF WASHINGTON)
2) ss.
3 County of Spokane)

4 _____, being first duly sworn on oath,
5 deposes and states:

6 I am the _____ of The Catholic Bishop of
7 Spokane, and I am authorized to execute these Interrogatories
8 and Requests for Production of Documents on behalf of The
9 Catholic Diocese of Spokane.

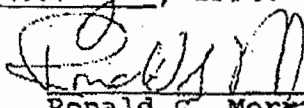
10 I have read the answers to the foregoing Interrogatories
11 and Requests for Production of Documents, know the contents
12 thereof, and state that they are true and correct to the best
13 of my knowledge.

14 _____
15 SUBSCRIBED AND SWORN TO before me this _____ day of
16 _____, 1994.

17 NOTARY PUBLIC in and for
18 the State of _____,
19 residing at _____.
20 My commission expires:
21 _____

22 The undersigned attorney for the party responding to the
23 above discovery matters signs this response in compliance
24 with Rule 26(g) of the Superior Court Civil Rules.

25 DATED this 10th day of January, 1994.


Ronald G. Morrison
WSBA # _____

INTERROGATORIES AND REQUESTS - 18

OEM CONN 1
0450

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

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DEC 16 1993

Huppin Ewing
Anderson, & Paul

December 14, 1993

William F. Etter
Etter & McMahon
Suite 450 Fernwell Bldg.
West 505 Riverside
Spokane, WA 99201

Ronald G. Morrison
Morrison & Leveque
South 1717 Rustle
Spokane, WA 99204

C. Eugene Huppin
Huppin, Ewing & Anderson
221 North Wall St., Suite 500
Spokane, WA 99201

RE: [REDACTED] v. Connelly, et al.

Dear Counsel:

I am writing to obtain dates from you upon which you are available for Plaintiff's deposition of the following individuals:

- a) Father [REDACTED]
- b) Father [REDACTED]
- c) The Superior(s) of the Franciscan Friars of St. Barbara from 1968 to 1973
- d) Bishop Skylstad
- e) Brother Berard Connelly

Could you please provide me with the name of Father [REDACTED] predecessor(s) from 1968 to 1973, in order that I can properly note their deposition.

In addition I would also like to depose your experts, if any. Accordingly I would request that you get their names to me as soon as possible. I may also need to depose some of your lay witnesses. Could you please provide me with their names at your earliest convenience.

I would like to receive your discovery responses prior to deposing Father [REDACTED] his predecessor(s) from 1968 to 1973, Father Blessing, Brother Connelly and Bishop Skylstad. Accordingly

OFM CONN 1

0451

[REDACTED]
December 14, 1993
Page - 2

your responses.

I would like to depose the above named individuals during the last two weeks of January. Please provide me with available dates and your thoughts on appropriate locations and I will schedule the depositions.

I anticipate deposing any lay or expert witnesses you intend to call during the first two weeks of January, 1994. Please provide me with available dates in that regard.

Pursuant to my discussion with Mr. Huppin, I am also writing to inform you that [REDACTED] declines your settlement offer of \$25,000.

I look forward to your early response in these matters.

Very truly yours,

Joan L. Antonietti

JOAN L. ANTONIETTI

ls
cc: C. Eugene Huppin
William Etter
Ronald Morrison

OEM CONN 1
0452

Bates Number 453 was removed by the Plaintiffs at the request of the Franciscans.

RECEIVED

DEC 13 1993

Third party privacy

ETTER & McMAHON, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[REDACTED] a single woman,

Plaintiff,

NO. 92-205445-5

vs.

PLAINTIFF'S REQUESTS
FOR ADMISSION
PROPOUNDED TO
DEFENDANT BROTHER
BERARD CONNELLY

BROTHER BERARD CONNELLY, a
Franciscan Brother; THE CATHOLIC
DIOCESE OF SPOKANE; THE CATHOLIC
BISHOP OF SPOKANE; THE FRANCISCAN
FRIARS, PROVINCE OF SAINT BARBARA;
AND THE ROMAN CATHOLIC CHURCH OF
THE PAPACY,

Defendants.

TO: BROTHER BERARD CONNELLY, defendant
AND TO: WILLIAM F. ETTER, your attorney

Plaintiff herewith submits the following Requests for Admission to be answered separately and fully under oath within thirty (30) days from the date of service of said Requests upon you.

IN ACCORDANCE WITH CIVIL RULE 36(a), EACH REQUEST FOR ADMISSION IS CONSIDERED ADMITTED UNLESS, WITHIN THIRTY (30) DAYS AFTER SERVICE OF THE REQUEST FOR ADMISSION, OR WITHIN SUCH SHORTER OR LONGER TIME AS THE COURT MAY ALLOW, THE PARTY TO WHOM THE REQUEST IS DIRECTED SERVES UPON THE PARTY REQUESTING THE ADMISSION A WRITTEN ANSWER OR OBJECTION ADDRESSED TO THE MATTER, SIGNED BY THE PARTY OR BY HIS ATTORNEY. IF OBJECTION IS MADE, THE REASONS THEREFOR SHALL BE STATED. THE ANSWER SHALL SPECIFICALLY DENY THE MATTER OR SET FORTH IN DETAIL THE REASONS WHY THE ANSWERING PARTY CANNOT TRUTHFULLY ADMIT OR DENY THE MATTER.

DEFINITIONS

In this First Set of Requests for Admission, the definitions of certain words and phrases are set forth below. When used in this First Set of Requests for Admission, these words and phrases are to have the meanings set forth below, unless otherwise specified in the individual Requests.

A. "Person": "Person" means any natural person, firm,

REQUESTS FOR ADMISSION - 1.

OFM CONN 1
0454

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Spokane, WA 99201
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partnership, association, joint venture, corporation, trust,
estate or any form of legal entity.

B. "You" and "Your": "You" and "Your" refer to
defendant Brother Berard Connelly.

DATED this 10 day of December, 1993.

JOAN L. ANTONIETTI, P.S.

Joan L. Antonietti
Joan L. Antonietti
WSBA #13795
Attorney for Plaintiff

REQUEST FOR ADMISSION NO. 1: Admit that you sexually abused,
plaintiff on parish premises.

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that you sexually abused
Plaintiff during parish related activities.

RESPONSE:

REQUEST FOR ADMISSION NO. 3: Admit that you sexually abused
Plaintiff.

RESPONSE:

REQUESTS FOR ADMISSION - 2

OFM CONN 1
0455

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ATTORNEY AT LAW
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Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

1 REQUEST FOR ADMISSION NO. 4: Admit that you sexually abused
2 parishioners other than Plaintiff on parish premises.

3 RESPONSE:

4
5 REQUEST FOR ADMISSION NO. 5: Admit that you sexually abused
6 parishioners other than Plaintiff during parish related
7 activities.

8 RESPONSE:

9
10 REQUEST FOR ADMISSION NO. 6: Admit that you have sexually
11 abused parishioners other than Plaintiff.

12 RESPONSE:

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14
15 REQUEST FOR ADMISSION NO. 7: Admit that you sexually abused
16 students other than Plaintiff.

17 RESPONSE:

18
19
20 REQUEST FOR ADMISSION NO. 8: Admit that you sexually abused
21 students other than Plaintiff on parish premises.

22 RESPONSE:

23
24
25 REQUESTS FOR ADMISSION - 3

OFM CONN 1
0456

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

1 REQUEST OF ADMISSION NO. 9: Admit that you sexually abused
2 students other than Plaintiff during parish related
3 activities.

4 RESPONSE:

5
6 REQUEST FOR ADMISSION NO. 10: Admit that other brothers and/or
7 priests were aware of certain inappropriate activities and
8 conduct on the part of yourself directed toward your students
9 and/or parishioners.

10 RESPONSE:

11
12
13 REQUEST FOR ADMISSION NO. 11: Admit that other brothers
14 and/or priests should have been aware of certain inappropriate
15 activities and conduct on the part of yourself directed toward
16 your students and/or parishioners.

17 RESPONSE:

18
19
20 REQUEST FOR ADMISSION NO. 12: Admit that other brothers
21 and/or priests were aware of certain inappropriate activities
22 and conduct on the part of yourself directed toward Plaintiff.

23 RESPONSE:

24
25 REQUESTS FOR ADMISSION - 4

OFM CONN 1
0457

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

1 REQUEST FOR ADMISSION NO. 13: Admit that other brothers
2 and/or priests should have been aware of certain inappropriate
3 activities and conduct on the part of yourself directed toward
4 Plaintiff.

5 RESPONSE:

6
7 REQUEST FOR ADMISSION NO. 14: Admit that you assaulted and
8 battered plaintiff?

9 RESPONSE:

10
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12 REQUEST FOR ADMISSION NO. 15: Admit that your acts directed
13 towards Plaintiff constituted extreme and outrageous conduct?

14 RESPONSE:

15
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17 REQUEST FOR ADMISSION NO. 16: Admit that your outrageous
18 conduct intentionally, recklessly and/or negligently caused
19 plaintiff to suffer severe emotional and mental distress?

20 RESPONSE:

21
22
23 REQUEST FOR ADMISSION NO. 17: Admit that you violated
24 plaintiff's right to enjoy her relationship with her family?

25 RESPONSE:

REQUESTS FOR ADMISSION - 5

OFM CONN 1
0458

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

Third party privacy

1 REQUEST FOR ADMISSION NO. 18: Admit that due to your
2 outrageous behavior, that plaintiff has suffered the loss of
3 her marriage to [REDACTED]

4 RESPONSE:
5

6
7 REQUEST FOR ADMISSION NO. 19: Admit that due to your
8 outrageous behavior, that plaintiff has suffered the loss of
9 her religious faith.

10 RESPONSE:
11

12
13 REQUEST FOR ADMISSION NO. 20: Admit that as a result of your
14 sexual abuse, plaintiff has suffered physical pain and
15 suffering and distress.
16

17 RESPONSE:
18

19
20 REQUEST FOR ADMISSION NO. 21: Admit that as a result of your
21 sexual abuse, plaintiff has suffered psychological pain and
22 suffering and distress.
23

24 RESPONSE:
25

REQUESTS FOR ADMISSION - 6

OFM CONN 1
0459

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Spokane, WA 99201
509/ 325-7330 - FAX 325-7334

1
2 REQUEST FOR ADMISSION NO. 22: Admit that as a result of your
3 sexual abuse, plaintiff has suffered emotional pain and
4 suffering and distress.

5 RESPONSE:
6
7

8 REQUEST FOR ADMISSION NO. 23: Admit that as a result of your
9 sexual abuse, plaintiff has suffered humiliation.

10 RESPONSE:
11
12

13 REQUEST FOR ADMISSION NO. 24: Admit that as a result of your
14 sexual abuse, plaintiff has suffered anxiety.

15 RESPONSE:
16
17

18 REQUEST FOR ADMISSION NO. 25: Admit that as a result of your
19 sexual abuse that plaintiff has had to seek out psychological
20 treatment and therapy?

21 RESPONSE:
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REQUESTS FOR ADMISSION ~ 7

OFM CONN 1
0460

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111 West Cataldo, Suite 210
Spokane, WA 99201
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REQUEST FOR ADMISSION NO. 26: Admit that you touched
plaintiff inappropriately without her consent.

RESPONSE:

REQUEST FOR ADMISSION NO. 27: Admit that the Franciscan Friars
Province of St. Barbara had notice of your propensity to
behave inappropriately, sexually either prior to or during
your sexual abuse of plaintiff.

RESPONSE:

REQUEST FOR ADMISSION NO. 28: Admit that the Catholic Diocese
of Spokane had notice of your propensity to behave
inappropriately, sexually, either prior to or during your
sexual abuse of plaintiff.

RESPONSE:

REQUEST FOR ADMISSION NO. 29: Admit that the Catholic Bishop
of Spokane had notice of your propensity to behave
inappropriately, sexually, either prior to or during you
sexual abuse of plaintiff.

RESPONSE:

REQUESTS FOR ADMISSION - 8

OFM CONN 1
0461

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 - FAX 325-7334

1
2 REQUEST FOR ADMISSION NO. 30: Admit that the Franciscan Friars
3 Province of St. Barbara had received complaints regarding your
4 inappropriate conduct either prior to or during your sexual
5 abuse of plaintiff.

6 RESPONSE:
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8

9 REQUEST FOR ADMISSION NO. 31: Admit that Catholic Diocese of
10 Spokane had received complaints regarding your inappropriate
11 conduct either prior to or during your sexual abuse of
12 plaintiff.

13 RESPONSE:
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15

16 REQUEST FOR ADMISSION NO. 32: Admit that the Catholic Bishop
17 of Spokane had received complaints regarding your
18 inappropriate conduct either prior to or during your sexual
19 abuse of plaintiff.

20 RESPONSE:
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REQUESTS FOR ADMISSION - 9

OFM CONN 1
0462

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/325-7330 - FAX 509/325-7334

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STATE OF WASHINGTON)
) ss.
County of Spokane)

BROTHER BERARD CONNELLY, being first duly sworn upon
oath, deposes and says:

I have read the answers to the foregoing Requests for
Admission, know the contents thereof, and state that they are
true and correct to the best of my knowledge.

Brother Berard Connelly

SUBSCRIBED AND SWORN TO before me this _____ day of
_____, 1994.

NOTARY PUBLIC in and for
the State of _____,
residing at _____.
My commission expires:

The undersigned attorney for the party responding to the
above discovery matters signs this response in compliance with
Rule 26(g) of the Superior Court Civil Rules.

DATED this _____ day of _____, 1994.

William F. Etter WSBA # _____

REQUESTS FOR ADMISSION - 10

OFM CONN 1
0463

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
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Third party privacy

RECEIVED

DEC 13 1993

ETTER & McMAHON, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[REDACTED] a single woman,

Plaintiff,

NO. 92-205445-5

vs.

BROTHER BERARD CONNELLY, a
Franciscan Brother; THE CATHOLIC
DIOCESE OF SPOKANE; THE CATHOLIC
BISHOP OF SPOKANE; THE FRANCISCAN
FRIARS, PROVINCE OF SAINT BARBARA;
AND THE ROMAN CATHOLIC CHURCH OF
THE PAPACY,

PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND
REQUESTS FOR PRODUCTION
OF DOCUMENTS PROPOUNDED
TO DEFENDANT BROTHER
BERARD CONNELLY

Defendants.

TO: DEFENDANT BROTHER BERARD CONNELLY and to your attorney,
William F. Etter

Pursuant to Rules 26, 33 and 34 of the Civil Rules for
Superior Court of the State of Washington, the Plaintiff
submits the following Interrogatories and Requests for
Production of Documents to be answered separately and
completely under oath within thirty (30) days of the service
thereof upon you. In answering, you are required to furnish
such information as is available to you, not merely the
information you know of your personal knowledge. This is
intended to include any information in the possession of your
agents, attorneys, or any investigators for you.

COURT RULES REQUIRE THAT THE ANSWERS BE PRECEDED BY THE
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND
THUS EXTRA COPIES OF THESE INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS ARE BEING SERVED UPON YOU IN ORDER TO
EXPEDITE THE ANSWERING THEREOF. YOU MAY TYPE YOUR ANSWERS
IMMEDIATELY AFTER THE INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS AND THUS AVOID RETYPING THE
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.

THESE INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS ARE CONTINUING IN NATURE, AND THE PLAINTIFF HEREBY
DEMANDS THAT ANY ADDITIONAL INFORMATION COMING INTO YOUR
POSSESSION OR YOUR COUNSEL'S OR AGENTS POSSESSION THAT WOULD
CHANGE OR ADD TO YOUR ANSWERS IN ANY WAY BE PROMPTLY FURNISHED
TO THE UNDERSIGNED, IN ANY EVENT, NO LATER THAN THIRTY (30)
DAYS AFTER RECEIPT OF SUCH INFORMATION.

INTERROGATORIES AND REQUESTS - 1

OFM CONN 1
0464

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 - FAX 325-7334

Moreover, pursuant to Rules 26 and 34 of the Civil Rules for Superior Court of the State of Washington, the Plaintiff, herein requests that you produce and permit Plaintiff to copy documents described below which are now in your or your attorneys or agents possession, custody and/or control.

Unless otherwise mutually agreed to, inspection and/or copying shall take place at the offices of the Plaintiff's attorney, Joan L. Antonietti, P.S., W. 111 Cataldo, Suite 210, Spokane, WA 99201, during regular business hours until completed, not later than thirty (30) days from the date of service of these Requests. Visual inspection shall be made by the Plaintiff's attorneys, and copying shall be done by photocopying or other appropriate means.

DEFINITIONS

As used in these interrogatories, the following terms shall have the following meanings:

1. The term "you" means yourself and any of your agents, employees, representatives, predecessors and successors in interest, any and all other persons or entities acting on your behalf.

2. The term "and" and "or" shall, unless the context clearly indicates otherwise, embrace both the conjunctive and disjunctive.

3. In construing these interrogatories, the singular of each term shall include the plural, and the plural shall include the singular, and a masculine, feminine or neuter pronoun shall not exclude the other genders.

4. The term "document" means all written, graphic, or printed matter of any kind, however produced or reproduced, including all originals, drafts, working papers, and non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, and electronic, mechanical or electrical records or representations of any kind, transacted through detection devices into reasonably useable form. The term "document" includes, but is not limited to, papers, books, patents, book entries, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, cables, telexes or telefax messages, memoranda, notes, data, notation, work papers, inter-office communications, inter-departmental communications, minutes, reports and records of any communications (including telephone or other conversations,

INTERROGATORIES AND REQUESTS - 2

OFM CONN 1
0465

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interviews, conferences, or committee or other meetings), affidavits, statements, summaries, opinions, reports, studies, analyses, formulas, plans, specifications, contracts, licenses, agreements, offers, acceptances, journals, books or other records of accounts, summaries of accounts, bills, receipts, balance sheets, income statements, advertisements, desk calendars, appointment books, diaries, lists, tabulations, charts, graphs, maps, surveys, sound recordings, computer records or impressions, microfilm, and all other records kept by electronic, photographic, or mechanical means, and things similar to any of the foregoing, however denominated.

5. The term "all documents" shall mean every document, as defined above, whether an original or a copy, which is or has been in your possession, custody, or control.

6. The term "person" includes any natural person, firm, association, partnership and joint venture corporation, and any other form of legal entity, and any city, state or federal governmental entity or any agency, board, or court thereof.

7. The term "identify" means, with respect to a document, to state its title, identifying number, type (e.g., letter, inter-office memorandum, etc.), date, author, addressee, signatories, recipients, present location, custodian, subject matter, and any other identifying characteristics.

8. The term "identify" means, with respect to a person, to state his or her full name, present or last known residence address and phone number; present or last known business address and phone number; present employer, job title, responsibilities and duties; prior experiences and background, including tenure in each title or position held to date; and previous job title, responsibilities, and duties; and employer and business address at the date of the event or transaction referred to.

9. The term "identify" means, with respect to an oral communication, to state the date of oral communication and the place where it occurred, the persons present during such communication, the person to whom such oral communication was directed, the person who made such communication, and the means by which such communication was transmitted (i.e., in person, by recorded message, or by telephone).

10. The term "relate," "relating to," or "related to" means directly or indirectly referring to, pertaining to, discussing, describing, commenting on, constituting, evidencing, referencing, comprising, or reflecting upon the

INTERROGATORIES AND REQUESTS - 3

OFM CONN 1

0466

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stated subject, in whole or in part.

INSTRUCTIONS

1. These interrogatories and requests are intended to be continuing in nature, and any information which may be discovered by you subsequent to the service and filing of your answers and responses should be brought to the attention of the inquiring party, through supplemental answers and responses, within a reasonable time following discovery (30 days). If such responses are not furnished, this party will move at the time of trial to exclude from evidence any requested information not so furnished.

2. Each interrogatory and each subparagraph of each interrogatory is to be fully and separately answered, in writing, and under oath. Before each response is given, the paragraph and subparagraph number of the interrogatory to which the answer or response relates is to be set forth.

3. The answer to each Interrogatory and response to each Request for Production of Documents shall include such knowledge as is within your custody, possession or control or readily obtained by you including knowledge within the custody, possession or control of your attorneys, agents, and other representatives.

4. If you refuse to answer any Interrogatory or Request for Production of Documents, in whole or in part, identify the basis of your refusal to answer, including any claim of privilege, in sufficient detail so as to permit the Court to adjudicate the validity of your refusal to answer.

5. With respect to any Interrogatory or Request for Production of Documents contained herein, if you are able to provide some, but not all, of the information requested, provide such information as you can and specifically identify each item as to which you do not have the sufficient information to fully respond.

INTERROGATORIES AND REQUESTS - 4

OFM CONN 1
0467

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6. We have attempted to provide you with sufficient space under each interrogatory and request for production to state your answer or response. If the space provided is insufficient, please continue your answer or response on a separate sheet, and attach that sheet to the copies of this pleading which you return to us.

DATED this _____ day of December, 1993.

JOAN L. ANTONIETTI, P.S.

Joan L. Antonietti
Joan L. Antonietti
WSBA NO. 13795
Attorney for Plaintiff

INTERROGATORY NO. 1: Please state:

- (a) Your full name;
- (b) Home address;
- (c) Date of birth; and
- (d) Place of birth.

ANSWER:

INTERROGATORIES AND REQUESTS - 5

OFM CONN 1
0468

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1 INTERROGATORY NO. 2: Identify each and every person who
2 provided any information used in responding to these
3 Interrogatories and Request for Production of Documents,
4 listing with respect to each the Interrogatory or Request for
5 Production for which the information was provided.

6 ANSWER:
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15 INTERROGATORY NO. 3: State each residence address you
16 have occupied at any time since you became a Franciscan
17 Brother, and the dates of each such occupation.

18 ANSWER:
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INTERROGATORIES AND REQUESTS - 6

OEM CONN 1
0469

JOAN E. Antoniotti P.S.
ATTORNEY AT LAW
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Spokane, WA 99201
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1 INTERROGATORY NO. 4: Identify all of your
2 jobs/occupations that you have engaged in since completing
3 high school and set forth in each instance:

4 (a) The period of time spent in each such
5 job/occupation;

6 (b) Name and address of each employer/supervisor;

7 (c) Description of the type of work performed;

8 (d) The compensation received per month;

9 (e) Reasons for leaving.

10 ANSWER:

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16 INTERROGATORY NO. 5: Please state whether or not you
17 have ever been arrested or charged with a crime. If your
18 answer is in the affirmative, please also state:

19 (a) When the arrest or charging took place;

20 (b) Where you were arrested or charged;

21 (c) Describe the exact details and basis of each such
22 arrest or charge; and

23 (d) Describe the final disposition of each arrest or
24 charge.
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INTERROGATORIES AND REQUESTS - 7

OFM CONN 1
0470

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Spokane, WA 99201
509/325-7333 FAX 509/325-7334

ANSWER:

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9 INTERROGATORY NO. 6: Have you ever voluntarily entered
10 or been committed to any hospital, clinic or institution,
11 either public or private, for the treatment or observation of
12 any psychological or psychiatric condition(s), alcoholism,
13 drug addiction, or any psychological or psychiatric problems
14 of any kind including but not limited to inappropriate sexual
15 conduct? If your answer is in the affirmative, please state:

16 (a) The name and address, and telephone number of each
17 such hospital, clinic or institution;

18 (b) The dates of your stay;

19 (c) The purpose or reason for your entry or being
20 committed into such hospital, clinic or institution; and

21 (d) The name, address and phone number of any health
22 care providers who cared for you at the hospital, clinic,
23 or institution.
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INTERROGATORIES AND REQUESTS - 8

OFM CONN 1

0471

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Spokane, WA 99201
CNR 775-7730 • FAX 775-7734

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ANSWER:

REQUEST OF PRODUCTION NO. 1: Please provide copies of all records maintained by any hospital, clinic or institution(s) identified in the immediately preceding interrogatory pertaining to yourself.

RESPONSE:

INTERROGATORIES AND REQUESTS - 9

OFM CONN 1
0472

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4 INTERROGATORY NO. 7: Please identify all physicians,
5 psychologists, psychiatrists and counselors whom you have
6 seen, consulted with and/or been treated by and state with
7 respect to each:

8 (a) Dates upon which you were seen by each health care
9 professional;

10 (b) Names, addresses and phone numbers of each health
11 care professional; and

12 (c) Reasons for contacting each health care
13 professional.

14 ANSWER:
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22 REQUEST FOR PRODUCTION NO. 2: Please produce copies of
23 all records pertaining to you kept by each of the health care
24 provider(s) listed in the immediately preceding interrogatory.

25 RESPONSE:

INTERROGATORIES AND REQUESTS - 10

OFM CONN 1
0473

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5 INTERROGATORY NO. 8: Please state whether or not there
6 is any history of sexual abuse in your family. If your answer
7 is in the affirmative, please identify each affected family
8 member and their relation to you and describe the abuse which
9 occurred.

10 ANSWER:
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18 INTERROGATORY NO. 9: Please state whether or not there
19 is any history of alcohol and/or drug abuse in your family.
20 If your answer is in the affirmative, please identify each
21 affected family member and their relation to you and describe
22 the abuse which occurred.

23 ANSWER:
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INTERROGATORIES AND REQUESTS - 11

OFM CONN 1
0474

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509/ 325-7330 • FAX 325-7334

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4 INTERROGATORY NO. 10: Have you ever been asked to
5 undergo any type of counseling or psychological evaluation by
6 any of your employers and/or by the Franciscan Friars,
7 Catholic Diocese of Spokane, or The Catholic Bishop of
8 Spokane? If your answer is in the affirmative, please state:

9 (a) The name and address of each such employers or co-
10 defendant who made the request;

11 (b) The name, address and phone number of the
12 counselor(s)/evaluator(s);

13 (c) Indicate the dates of counseling/evaluation; and

14 (d) Describe the reasons you were asked to undergo
15 counseling/evaluation.

16 ANSWER:
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INTERROGATORIES AND REQUESTS - 12

OFM CONN 1
0475

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1 REQUEST FOR PRODUCTION NO. 3: Please provide copies of
2 all counseling/evaluation records for each counselor/evaluator
3 identified in response to the preceding interrogatory.

4 RESPONSE:

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8 INTERROGATORY NO. 11: If you currently are or have ever
9 been a party to any litigation other than this lawsuit; please
10 state for each:

- 11 (a) The nature of the suit;
12 (b) The date, court, place and cause number for each
13 prior action;
14 (c) The full names and last known addresses of all
15 parties of each prior suit and their respective
16 attorneys;
17 (d) The present status of each suit; and
18 (e) If concluded, the result or disposition of each
19 suit.

20 ANSWER:
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INTERROGATORIES AND REQUESTS - 13

OFM CONN 1
0476

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1 INTERROGATORY NO. 12: Please state whether anyone
2 excepting Plaintiff has ever complained about you with regard
3 to any of the following:

- 4 (a) Inappropriate sexual conduct;
5 (b) Inappropriate conduct directed toward parishioners;
6 (c) Inappropriate conduct directed toward students;
7 (d) Inappropriate conduct at parish dances; or
8 (e) Inappropriate conduct directed towards other
9 brothers, priests, nuns or sisters.

10 ANSWER:
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INTERROGATORIES AND REQUESTS - 14

OFM CONN 1
0477

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INTERROGATORY NO. 13: If your answer to the immediately preceding interrogatory is in the affirmative:

(a) Identify the complaining party by name, address, and phone number;

(b) Identify the person(s) to whom the complaining party complained, by name, address and phone number;

(c) Summarize the complaint;

(d) Describe the disposition, if any, of the complaint;

(e) Identify all persons who have any knowledge of the complaint, whether actual knowledge of the substance of the complaint or that the complaint had been made;

(f) Set forth the respective dates upon which each complaint was made; and

(g) Please state whether or not any of the aforescribed complaints were set forth in writing.

ANSWER:

INTERROGATORIES AND REQUESTS - 15

OEM CONN 1
0478

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1 REQUEST FOR PRODUCTION NO. 4: Please produce any
2 documents regarding or in any manner relating to any of the
3 complaints identified in response to the immediately preceding
4 interrogatory including but not limited to any written
5 complaint itself.

6 RESPONSE:

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14 INTERROGATORY NO. 14: Please describe your educational
15 background by stating as follows:

16 (a) Names and address of all grade schools, high
17 schools, colleges or universities attended;

18 (b) Dates of attendance;

19 (c) Describe any degrees obtained, and set forth the
20 dates upon which any degree was obtained; and

21 (d) Describe any education and/or special training
22 required of you by the Franciscan Friars, and/or Catholic
23 Bishop of Spokane, or the Catholic Diocese of Spokane.
24

25 INTERROGATORIES AND REQUESTS - 16

OFM CONN 1
0479

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ANSWER:

REQUEST FOR PRODUCTION NO. 5: Please produce any records or documents pertaining to yourself maintained by the Franciscan Friars, Catholic Diocese of Spokane, or Catholic Bishop of Spokane, including but not limited to:

- (a) Personnel records or documents;
- (b) Medical records or documents; and
- (c) Disciplinary records or documents.

RESPONSE:

INTERROGATORIES AND REQUESTS - 17

OFM CONN 1
0480

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2 INTERROGATORY NO. 15: Please identify any persons
(excepting Plaintiff) with whom you have been sexually
inappropriate by stating:

3 (a) Their name, address and phone number;

4 (b) Describe the inappropriate sexual activity engaged
in;

5 (c) Set forth the dates upon which the inappropriate
6 sexual activity occurred; and

7 (d) State whether any person complained about the
8 inappropriate sexual activity and if your answer is in
9 the affirmative, identity said persons by name, address
10 and phone number.

11 ANSWER:
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20 INTERROGATORY NO. 16: Please identify all persons whom
you intend to call as witnesses at trial by stating:

21 (a) Name, address and phone number of each witness; and

22 (b) The substance of each witness' expected testimony.
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INTERROGATORIES AND REQUESTS - 18

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0481

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ANSWER:

INTERROGATORY NO. 17: Please identify all persons who witnessed any of the incidents complained about by the Plaintiff by stating:

- (a) Name; Address; and phone number of each witness; and
- (b) The substance of each witness' knowledge with regard to Plaintiff's allegations.

ANSWER:

INTERROGATORIES AND REQUESTS - 19

OFM CONN 1
0482

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1 INTERROGATORY NO. 18: Please identify any and all
2 persons whom you intend to call as an expert witness in this
3 matter by stating:

- 4 (a) The name, address and phone number of each expert;
5 (b) The substance of their expected testimony; and
6 (c) The basis for their expected testimony.

7 ANSWER:
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13 INTERROGATORY NO. 19: Please state the reasons why you
14 ceased working in Spokane, Washington.

15 ANSWER:
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INTERROGATORIES AND REQUESTS - 20

OEM CONN 1
0483

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1 STATE OF WASHINGTON)
2) ss.
3 County of Spokane)

4 BROTHER BERARD CONNELLY, being first duly sworn on oath,
5 deposes and states:

6 I have read the answers to the foregoing Interrogatories
7 and Requests for Production of Documents, know the contents
8 thereof, and state that they are true and correct to the best
9 of my knowledge.

10 BROTHER BERARD CONNELLY

11 SUBSCRIBED AND SWORN to before me this ____ day of
12 _____, 1994.

13 NOTARY PUBLIC in and for
14 the State of _____,
15 residing at _____,
16 My commission expires:
17 _____

18 The undersigned attorney for the party responding to the
19 above discovery matters signs this response in compliance with
20 Rule 26(g) of the Superior Court Civil Rules.

21 DATED this ____ day of _____, 1994.

22 William F. Etter
23 WSBA # _____

24 INTERROGATORIES AND REQUESTS - 21

25 OFM CONN 1
0484

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Bates Numbers 485-491 were removed by the Plaintiffs at the request of the Franciscans.

Bates Numbers 492-495 were removed by the Plaintiffs at the request of the Franciscans.

SAINT FRANCIS



RETREAT CENTER

file

October 18, 1993

Dear [REDACTED] --

Welcome home from Malta!

I found the enclosed little prayerbook and wondered if you might like to add it to your pious-book collection.

Regarding the Provincial Definitorium notes:

1) I have memories of helping Hugh Noonan mailing those giant recordings of the "Hour of St. Francis" and like most friars was very proud and fond of "The Hour."

Over the years I felt The Hour lost its mission and became discontent with preaching to aunts and mothers-in-law, little people. It lost its touch and became self-grandizing, artsy.

I have no regrets with its closing.

2) I repeat my sorrow at the amount of time you have had to spend in sex cases. 75% taken from Province leadership and inspiration is a terrible loss.

3) And I thought "MC" meant "multi-cultural." The 11% is a shocker when seen in print. I'm just as glad you noted it in the budget so we all see misconduct is costly. In money. Some of us know the cost in spirit.

If I were less mentally healthy I would fear that while friars may forgive and accept the sinner they might not be as generous when it comes to 11% of their often hard earned money.

[REDACTED] you've said the friars never surprise you. They do surprise me with their kindness -- at least, many of them.

Peace!

Benny

OFM CONN 1

0496

Bates Numbers 497-500 were removed by the Plaintiffs at the request of the Franciscans.

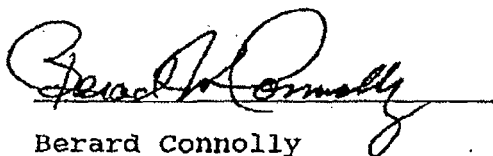
Bates Numbers 501-502 were removed by the Plaintiffs at the request of the Franciscans.

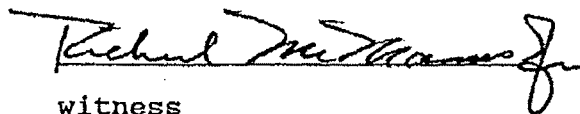
Bates Numbers 503-508 were removed by the Plaintiffs at the request of the Franciscans.

Bates Numbers 509-510 were removed by the Plaintiffs at the request of the Franciscans.

Very [REDACTED]
[REDACTED]

I, Berard William Connolly, a Professed Franciscan of the Saint Barbara Province, do hereby give my consent to the release of my personal files as maintained at the Provincial Office, to [REDACTED] with the understanding that he will use whatever information contained therein in a prudent and lawful manner.


Berard Connolly


witness

4-12-93
date

Bates Number 512 was removed by the Plaintiffs at the request of the Franciscans.

January 3, 1990

[REDACTED]

Dear [REDACTED]

I am writing you this confidential letter to bring a case of sexual abuse by a member of your order, Br. Berard Connolly, to your attention. The motivation for writing this letter is to help bring about my own personal healing and closure to this issue of sexual abuse. I also want to protect others from the pain of betrayal, shame, and violation that results from sexual abuse. In light of statements he had made, and my own experience, his being around children concerns me greatly. It has been my experience coming from a dysfunctional family situation involving alcoholism and sexual abuse, that any pedophile must receive on going counseling and monitoring. Therefore, I would like a written reply confirming that Br. Berard will receive therapy as well as current monitoring of his activities or behaviors in dealing with children.

The abuse by Br. Berard has effected every aspect of my life and continues to play a role in my present views of God, the Church, love, trust, and this list is innumerable. When I was a young adolescent and all was chaotic in my family, I turned towards what appeared to be a safe and spiritual direction for protection from the sexual abuse and alcoholism at home, only to be guided step by step into further abuse. I only became more confused in my teen years by the mixed message of having Br. Berard not only as a friend, but also as a representation of the Church, providing instruction in religion courses in high school. Because of the role that he held in my life and the Church, coupled with the abuse, I felt that I had seduced God, when in reality it was Br. Berard who had neatly groomed me. The injustice of the matter was that he was the adult in the situation and exploited his position and the knowledge of my family situation to cross boundaries repetitively that should never be crossed.

I am requesting reimbursement for the counseling I have received over the last year, as well as any further counseling, with Sr. Cathy Beckley at St. Joseph Family Center in Spokane, WA.

Sincerely,

[REDACTED]

Third party privacy

FRANCISCAN FRIARS PROVINCE OF SAINT BARBARA

[REDACTED]

January 17, 1990

Dear [REDACTED]

Peace and all good. It was with great concern that I read your letter to me of January 3, which arrived here just a few days ago.

The matters which you raise are of the utmost importance. I want to express to you my deepest concern, for yourself and for the suffering that has happened. I have dealt with some of these questions of abuse before, and I know that the agony the victim goes through can hardly be described. I am grateful that you have addressed these issues in such an honest and concerned manner in your letter.

In order that your own needs might be well met and your concerns for Brother Berard be more adequately addressed, I would appreciate some more information. I know that the matters you have touched on are of a very sensitive and personal nature, and I can assure you they will be treated with the utmost confidentiality. I have asked the chairman of our health and wellness committee, [REDACTED], to contact you either directly or through St. Cathy Beckley at the Family Center in Spokane. [REDACTED] is trained in psychology and has a good deal of experience. I hope that you will be able to talk with him as openly as you have written to me. Because this matter is of such concern (and it is important that it be addressed in an on-going way for all involved), it is vital that we proceed together to heal terrible hurts and make certain that such a thing does not happen again.

I hope that this suggestion is acceptable to you. Please be assured of my continued prayers and concern.

Sincerely

[REDACTED]

OEM CONN 1
0514

1500 Cherry - fourth Avenue
Oakland, CA 94612

Fr. James Blessing, O.F.M.

Provincial Minister (415) 536-3722