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April 17, 2002

James P. Collins, Sr.
Diocese of Wilmington
1626 North Union Street
P.O. Box 2030
Wilmington, DE 19899

RE: [REDACTED]

Dear Jim:

It was a pleasure meeting with you on Thursday, April 11, 2002. As I explained at our meeting the sexual abuse suffered by [REDACTED] has had a profound and devastating impact on his life. [REDACTED] is available at your convenience to discuss the details of the abuse and its consequences.

At the close of our conversation you indicated that you would research the insurance policies that might be applicable to this matter. I would respectfully ask you to review any policies that were in existence from 1958 to the present that might apply to this situation. It is undisputed that [REDACTED] was sexually abused by Father Clarahan. Monsignor Lemon recently admitted that an investigation had revealed that Father Clarahan did sexually abuse [REDACTED]. One of [REDACTED] main concerns is the fact that his allegations and questions regarding Father Clarahan were never addressed, despite his inquiries. Further, although Father Clarahan was retired, the church simply failed to provide any information to [REDACTED] that would have allowed him to bring some sort of closure to the heinous acts that were inflicted upon him. The insurance policies up to the present are applicable because we believe the intentional concealment of information from [REDACTED] about Father Clarahan's actions against him has served to magnify the abuse he suffered. If you need more detailed information to determine which insurance policies may be applicable, do not hesitate to contact me.

As I explained at our meeting [REDACTED] is interested in a number of things beyond any financial compensation for the abuse he suffered and the 40 years that he has had to live with the consequences of Father Clarahan's actions. [REDACTED] has asked me to convey what he would like

to see as a way to resolve not only his matter, but to also assist others who may have been victimized:

1. Coordinate all religious organizations within the Diocese to develop a comprehensive approach to addressing this issue. He believes it would be beneficial for a single policy to emanate from the Diocese that would control this issue.

2. Publish the verified individual perpetrators, both past and present.

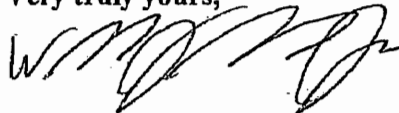
3. Publish a warning of what will happen to future perpetrators, if such actions are confirmed.

4. Publish the criteria for screening potential priests.

5. Compensation in the amount of [redacted]

[redacted] I have carefully researched the law surrounding these issues. I strongly believe [redacted] causes of action will survive a statute of limitations defense. If a jury were to hear the facts surrounding the abuse of [redacted] and the devastating impact to him and his family, I am confident that a jury award would be significantly higher than the amount demanded. Please let me know if I can provide any additional information. I look forward to hearing from you on this matter.

Very truly yours,



WILLIAM J. RHODUNDA, JR.

WJR, Jr./bld

cc: [redacted]