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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST

Coordinated Proceedings	) JCCP NO. 4286
Special Title (Rule 1550(b))	) LASC CASE NO.
	) BC376766
THE CLERGY CASES I	)
_____	)
LUIS C., an individual,	)
	)
Plaintiff,	)
	)
v.	)
	)
JOHN DOE I, et al.	)
	)
Defendants.	)
_____	)

VIDEOTAPE DEPOSITION OF  
BISHOP THOMAS CURRY  
WEDNESDAY, SEPTEMBER 30, 2009

10:00 A.M.

Transcript of deposition taken in Luis C., LASC Case No. BC376766, and approved for release to the public in John VG Doe, BC412464. On June 10, 2010, Counsel for Plaintiff John VG Doe and for Defendants The Roman Catholic Archbishop of Los Angeles, a corporation sole, and St. Thomas the Apostle Church and School in John VG Doe stipulated to redact private information as required by prior orders of the Court, including the Order re Privacy Redactions filed by Judge Haley J. Fromholz on December 8, 2005, and the Order re Privacy Redactions filed by Judge Emilie H. Elias on November 16, 2009. The final redactions were agreed to by the above counsel on June 15, 2010.

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	)
Defendants.	)
_____	)

The videotape of Bishop Thomas Curry,  
taken on behalf of Plaintiff, before Louann Thibert, CSR  
No. 8152 for the State of California, commencing at  
10:00 a.m., on Wednesday, September 30, 2009 at 4220 Von  
Karman Avenue, Suite 200, Newport Beach, California.

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. I N D E X

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WITNESS INSTRUCTED NOT TO ANSWER

52, 58, 61, 79, 80, 81, 98, 100, 122

1 WEDNESDAY, SEPTEMBER 30, 2009; 10:00 a.m.

2 NEWPORT BEACH, CALIFORNIA

3 -o0o-

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5

6 THE VIDEOGRAPHER: Good morning.

7

8 This is the videotape deposition of  
9 Bishop Thomas Curry. Today we're located at 4220 Von  
10 Karman Avenue on the second floor in Newport Beach,  
11 California. Today is Wednesday, September 30th in the  
12 year 2009.

13 We're here today in the matter of Luis  
14 C., an individual, versus John Doe I, case number to  
15 this deposition, the JCCP number is 4286. The Los  
16 Angeles Superior Court number is BC-376766.

17 My name is Dean Jones with Dean Jones  
18 Attorney Video Services of Los Angeles and Santa Ana,  
19 California. Today's deposition is now commencing at  
20 10:17 a.m.

10:17:35

21 Would all present please identify  
22 themselves beginning with the deponent.

23 THE WITNESS: Bishop Thomas Curry.

24 MR. WOODS: Donald Woods of Hennighan,  
25 Bennett & Dorman, on behalf of a number of  
Defendants, including the witness.

10:17:47

10:17:50 1 MR. GARPARI: Paul Gaspari, Tobin & Tobin,  
2 on behalf of the Defendant Servants of the  
3 Paraclete.

4 MR. STEIER: Don Steier for Defendant Doe  
10:17:58 5 3.

6 MR. FINALDI: Vince Finaldi for plaintiff.

7 MR. MANLY: John Manly for the plaintiff.

8 THE VIDEOGRAPHER: Would the court  
9 reporter please administer the oath.

10:18:17 10  
11 BISHOP THOMAS CURRY,  
12 AFTER BEING DULY SWORN BY THE CERTIFIED SHORTHAND  
13 REPORTER, WAS EXAMINED AND TESTIFIED AS FOLLOWS:

14  
10:18:18 15  
16 EXAMINATION

17  
18 BY MR. MANLY:

19 Q Good morning, Bishop.

10:18:23 20 A Good morning, sir.

21 Q Bishop, before we start the sort of  
22 formalities of the deposition, I just want to tell  
23 you my purpose today here is not to make you  
24 physically uncomfortable or make it unpleasant.

10:18:34 25 I would like you to be as comfortable

10:18:36 1 as you possibly can, so at any point if you need a  
2 glass of water, you need to stretch your legs, you  
3 want to talk to your counsel, etc., the only thing I  
4 would ask is that you answer the question I have  
10:18:46 5 pending or if I am in the middle of a line of  
6 questioning, I finish the last couple of questions  
7 before we break. Okay. Do you understand?  
8 A Yes.  
9 Q At any time if you need a break, you just  
10:18:54 10 let me know. Okay?  
11 A Okay.  
12 Q Have you ever had your deposition taken  
13 before, Excellency?  
14 A I had long time ago.  
10:19:04 15 Q So it's been a while?  
16 A Yes.  
17 Q When were you last deposed, if you  
18 remember?  
19 A Sometime during the 1980's.  
10:19:14 20 Q Okay. Do you remember what that was  
21 about?  
22 A I don't.  
23 Q Okay. Well, let me go through some ground  
24 rules. I'm sure you had an opportunity to speak to  
10:19:28 25 Mr. Woods or some -- one of the other attorneys for

10:19:30 1 the Archdiocese, but I just want to make sure you  
2 understand what we're doing here today.

3 The first thing that you need to know  
4 is that the oath you took is the same oath you would  
10:19:39 5 take in a court of law and has the same obligations,  
6 meaning that you have to tell the truth.

7 Do you understand that?

8 A Yes.

9 Q Do you understand if you don't tell the  
10:19:45 10 truth, you could be subject to perjury charges?

11 A Yes.

12 Q Okay. The other thing is that anything we  
13 say while we're on the record, that the court  
14 reporter's gonna -- will take down and will be part  
10:20:00 15 of the record. So it's very important that you  
16 remember that. Okay?

17 A Yes.

18 Q The other thing is that at the end of  
19 deposition, the court reporter is going to take her  
10:20:11 20 notes, she is going to transcribe them and they'll  
21 be -- the whole deposition will be in magazine size  
22 package and it will be sent to Mr. Woods or to you  
23 and you will be asked to review it and then make  
24 changes to it.

10:20:27 25 I want to caution you from the outset



10:20:30 1 of the deposition, that if you make changes that are  
2 substantive to your testimony, that myself or the  
3 other lawyers are entitled to comment on that at  
4 time of trial.

10:20:38 5 Do you understand that? That could  
6 adversely affect your case, it could adversely  
7 affect the Archdiocese's case or my client's case.  
8 The point is, it's very important to give your best  
9 and most accurate testimony today.

10:20:51 10 Do you understand?

11 A Yes.

12 Q Okay. If I ask you a question, I am going  
13 to assume you understood it, so it's very important  
14 that if you don't understand one of my questions,  
10:20:58 15 you indicate that you don't understand and I will be  
16 happy to attempt to rephrase it so you can  
17 understand it. Okay?

18 A Yes.

19 Q The other thing is that sometimes because  
10:21:12 20 of the lapse of time, you know, if I ask you a  
21 question that calls for a date, time, place, you may  
22 not be able to precisely remember the date or the  
23 time, so in those instances, I don't want you to  
24 guess, but what I would like you to do is give me  
10:21:26 25 your best estimate.

10:21:27 1 Do you understand?

2 A Yes.

3 Q Do you understand the difference between a  
4 guess and an estimate?

10:21:29 5 A Yes.

6 Q Okay. This is more of a housekeeping  
7 detail. Sometimes in normal conversation, we  
8 overlap one another. If you and I are talking and  
9 we overlap one another in normal conversation,

10:21:45 10 that's totally appropriate, if not typical of  
11 somebody who's Irish like me, however, in a  
12 deposition, it's really hard to do that, so it is  
13 very, very important that you wait until I finish my  
14 question to answer.

10:21:58 15 And if Mr. Woods or any of the other  
16 lawyers try to object, wait until they're finished  
17 with their objection and then you answer. By the  
18 same token, it's very important for me to let you  
19 finish answering the question before I ask my next  
20 question.

10:22:12 21 If at any time I inadvertently interrupt  
22 your answer, please let know because I don't want to do  
23 that. Okay?

24 A Yes.

10:22:21 25 Q All right. The other thing I would ask

10:22:21 1 you to do, because I think you are sort of soft  
2 spoken, is to speak up as much as you can. Okay?

3 A Yes.

4 Q Bishop, what is your date of birth,  
10:22:35 5 please.

6 A January 17th, 1943.

7 Q And your present age?

8 A 66.

9 Q Where do you currently reside?

10:22:41 10 A The exact address?

11 Q Yes, please.

12

13

14 Q Okay. All right. And what do you

10:23:03 15 currently do as an occupation? I think I know, but  
16 I'm going to ask for the record.

17 A I am the Auxiliary Bishop of the  
18 Archdiocese of Los Angeles and I am the Bishop of  
19 the Santa Barbara Pastoral Region.

10:23:18 20 Q Okay. And when were you first ordained to  
21 the episcopacy, Your Excellency?

22 A In 1994.

23 Q And who was the ordaining prelate?

24 A Cardinal Mahony.

10:23:28 25 Q And when were you ordained to the

10:23:32 1 priesthood?  
2 A 1967.  
3 Q And who ordained you, if you remember?  
4 A I should but I -- it's not coming to mind  
10:23:46 5 at the moment.  
6 Q Was it Manning or ---  
7 A No. It was the Bishop of Hawaii.  
8 Q Oh, okay. All right. Where were you  
9 ordained?  
10:23:54 10 A In All Hallows Seminary in Dublin.  
11 Q I'm sorry?  
12 A All Hallows, two words, A-L-L,  
13 H-A-L-L-O-W-S.  
14 Q I've actually been there.  
10:24:04 15 And where did you grow up?  
16 A I grew up in Ireland.  
17 Q In what county?  
18 A In County Cavan, C-A-V-A-N.  
19 Q What age were you when you entered the  
10:24:15 20 seminary?  
21 A I was 17.  
22 Q And did you do all your work at All  
23 Hallows?  
24 A I studied at University College Dublin  
10:24:26 25 while I was at All Hallows.

10:24:28 1 Q Did you get a degree there?  
2 A Yes.  
3 Q And what's your degree in, Excellency?  
4 A History and political science.  
10:24:35 5 Q So you were living at All Hallows and  
6 studying some at All Hallows and doing work at  
7 university college as well?  
8 A Yes.  
9 Q And when did you get ordained? What year?  
10:24:50 10 A 1967.  
11 Q So you entered when?  
12 A 1960.  
13 Q Were you ordained in Ireland?  
14 A Yes.  
10:25:14 15 Q And were you ordained for the Archdiocese  
16 of L.A.?  
17 A Yes, I was.  
18 Q And where were you first assigned to work?  
19 A I was first assigned to St. Bernardine of  
10:25:32 20 Sienna in Woodland Hills.  
21 Q On Ventura Boulevard?  
22 A No. On Valley Circle Boulevard.  
23 Q Okay. And how long were you there?  
24 A I was there three years.  
10:25:44 25 Q Where did you work after that?

10:25:46 1 A I was assigned to Pias X High School for  
2 five years, from 1970 to 1975, in Downey.

3 Q The Old Angeles Lake.

4 Pias X from '70 to '75. Where did  
10:26:03 5 you go after that?

6 A I went to Claremont Graduate School to  
7 study.

8 Q And what did you study?

9 A I studied history.

10:26:12 10 Q And when you were at Pias X, what did you  
11 teach, Excellency?

12 A Taught religion.

13 Q And were you an administrator there or --

14 A Department chair.

10:26:24 15 Q All right. And how long were you at  
16 Claremont? Two years?

17 A I was at Claremont for three years.

18 Q And what did you get your degree in?

19 A American history.

10:26:41 20 Q Was it a Master's?

21 A No. Ph.D.

22 Q All right. And where did you -- where  
23 were you assigned next?

24 A I was assigned for one year to St. Paul's

10:26:55 25 High School in Santa Fe Springs.

10:27:02 1 Q Okay. So that brings us to '79?  
2 A Yes.  
3 Q And where did you go in '79?  
4 A I went back to finish my degree at  
10:27:10 5 Claremont, but I was also part time continuing --  
6 Director of Continuing Education for the clergy.  
7 Q Where did you physically perform that job,  
8 continuing education job?  
9 A It was -- there was no one place. It  
10:27:27 10 was -- courses were held throughout.  
11 Q It was just a responsibility you had?  
12 A Well, courses were held in many retreat  
13 houses and different places.  
14 Q Okay. And then 1980, I think that's where  
10:27:41 15 we are.  
16 A 1980, I was assigned as full time --  
17 actually, I think it's 1981. If I made a mistake,  
18 at the beginning --  
19 Q I think you are right. I messed it up.  
10:27:52 20 A 1981, I was assigned as full time Director  
21 of Continuing Education for the clergy.  
22 Q And that was by Cardinal Manning?  
23 A Yes.  
24 Q Did Father [REDACTED] or Monsignor --  
10:28:11 25 not [REDACTED] -- what was Manning's Vicar General's

10:28:15 1 name?  
2 A Monsignor Hawkes.  
3 Q Yes. What was his secretary's name?  
4 A [REDACTED]  
10:28:24 5 Q Did Father [REDACTED] go to All Hallows?  
6 A No.  
7 Q All right. And so how long did you hold  
8 the Director of Continuing Education for the Clergy?  
9 A Through 1985.  
10:28:37 10 Q Okay. And where did you go after that?  
11 A I was appointed Vicar for the Clergy.  
12 Q And who appointed you to that position?  
13 A Cardinal Mahony.  
14 Q How long did you hold that job?  
10:28:53 15 A Five years.  
16 Q So from 1985 to 1990, you were the Vicar  
17 for Clergy?  
18 A 1986.  
19 Q 1986 to 1990, you were Vicar for Clergy?  
10:29:07 20 A That's right.  
21 Q And what did you do, what job did you hold  
22 between '90 and '94, Your Excellency?  
23 A Between 1994, I was on sabbatical for four  
24 months and then I was appointed to St. Catherine  
10:29:23 25 of -- St. Catherine Laboure in Redondo -- not



10:29:30 1 Redondo Beach, but Torrance.  
2 Q As a pastor?  
3 A No. As an associate for about a year.  
4 Q Did you have any ancillary duties there  
10:29:43 5 besides that?  
6 A Pardon me?  
7 Q Did you have any other duties besides  
8 associate pastor at St. Catherine Laboure?  
9 A No.  
10:29:50 10 Q All right. Where did you go after that?  
11 A I was appointed as the secretariat for  
12 church ministerial services.  
13 Q You were appointed as the secretary --  
14 A Secretariat for church ministerial -- in  
10:30:03 15 charge of the secretariat for church ministerial  
16 services.  
17 Q So were you a department head?  
18 A Yes.  
19 Q When you performed the Vicar for Clergy  
10:30:14 20 job, where was your work site?  
21 A At the Archdiocesan offices on 9th Street.  
22 Q And was that the same for the secretariat  
23 for ministerial services?  
24 A Yes.  
10:30:25 25 Q Who was your direct supervisor in both of

10:30:28           1       those positions?

                  2           A     Cardinal Mahony.

                  3           Q     Okay.  And so how long did you hold a

                  4       position of secretariat for ministerial services?

10:30:43           5           A     Until March of 1994.

                  6           Q     And what happened then?

                  7           A     Then I was ordained a bishop and I moved

                  8       to Santa Barbara.

                  9           Q     And you have been the Bishop there since?

10:30:54           10          A     1994.

                  11          Q     Who was your predecessor of that job?

                  12          A     Bishop Pat Ziemann.

                  13          Q     So Ziemann went to -- Bishop Ziemann went

                  14       to Santa Rosa?

10:31:06           15          A     Yes.

                  16          Q     All right.  And have you lived at your

                  17       current residence that entire time?

                  18          A     Yes, I have.

                  19          Q     Okay.  Is that associated with the church,

10:31:22           20       the parish where you live?

                  21          A     It is the former convent for San Roque

                  22       Parish.

                  23          Q     Would you spell that for me?

                  24          A     S-A-N, R-O-Q-U-E.

10:31:34           25          Q     Okay.  Did Michael Baker ever reside

10:31:42 1 there?  
2 A No.  
3 Q How about Richard Loomis?  
4 A No.  
10:31:49 5 Q Do you know Michael Baker, Bishop?  
6 A Yes.  
7 Q And how long have you known Mike Baker?  
8 A Since I was involved with the continuing  
9 education of the clergy.  
10:32:07 10 Q So 1979; is that right?  
11 A Well, 1980, I was full time.  
12 Q Okay. And how did you come to know him  
13 during that time, sir?  
14 A As part of my general knowledge of the  
10:32:30 15 priests whom I would have met on different  
16 occasions.  
17 Q So as the head of continuing education,  
18 you tried to get to know the priests; is that fair?  
19 A Yes.  
10:32:46 20 Q How did you go about doing that? What  
21 steps did you take to do that?  
22 A We had many presentations on different  
23 ministerial subjects and I met priests on annual  
24 retreats and other occasions.  
10:33:24 25 Q Now, you held the position of continuing

10:33:27 1 education with the clergy during both Bishop  
2 Manning's or Bishop Mahony's time or had some of  
3 those responsibilities; is that right?

4 A Yes.

10:33:37 5 Q In terms of the way that was handled  
6 between Manning and Mahony, did you notice anything  
7 different? Did anything change when the Cardinal  
8 came in, Cardinal Mahony? I'm sorry.

9 MR. WOODS: Object to the form of the  
10:33:52 10 question in that it's confusing.

11 THE WITNESS: Could you please --

12 MR. MANLY: Sure.

13 THE WITNESS: -- reframe the question?

14 BY MR. MANLY:

10:33:57 15 Q Did the way the program the program was  
16 administered change after Cardinal Mahony was  
17 appointed Archbishop of L.A.?

18 A No.

19 Q In terms of the administration of the  
10:34:10 20 diocese when the Cardinal -- when Mahony became  
21 Archbishop, did administration or the way that the  
22 Archdiocese was run change?

23 A Yes.

24 Q How did that happen? How would you  
10:34:27 25 describe that?

10:34:30 1 A There were different people. There was a  
2 change in personnel. And the Cardinal decided to  
3 appoint a Vicar for Clergy.

4 Q Okay. And that position did not exist  
10:34:49 5 previously in the Manning administration?

6 A No.

7 Q Do you know why he did that?

8 MR. WOODS: I'm going to object --

9 THE WITNESS: I don't.

10:34:57 10 MR. WOODS: -- calls for the state of mind  
11 of a third person, unless it was expressed.

12 MR. MANLY: You can answer.

13 THE WITNESS: I don't know.

14 BY MR. MANLY:

10:35:03 15 Q Did he ever say why?

16 A No. I don't remember.

17 Q As Vicar for Clergy, when you were  
18 appointed in 1986 by the Cardinal, he wasn't a  
19 Cardinal in 1986, was he?

10:35:17 20 A No.

21 Q When the Archbishop -- then Archbishop  
22 Mahony appointed you in '86, what did you understand  
23 your job responsibilities to be?

24 A I understood that I was the direct  
10:35:29 25 delegate for him in dealing with matters pertaining

10:35:32 1 to the clergy.

2 Q In all matters?

3 A Yes.

4 Q When you say, "direct delegate," can you

10:35:45 5 explain what you mean, Bishop?

6 A I was his appointee to deal with that part

7 of his responsibilities.

8 Q Okay. So, in other words, when the

9 priests were dealing with you, they were to

10:35:58 10 understand that you had been given that authority by

11 the Cardinal, correct?

12 A Yes.

13 Q And you reported directly to the Cardinal?

14 A Yes.

10:36:13 15 Q While you were Vicar for Clergy, how many

16 cases of alleged sexual misconduct with priests --

17 by priests with minors came to your attention?

18 A I don't remember that.

19 Q Okay. Did any come to your attention?

10:36:23 20 A Yes.

21 Q Do you have an estimate of how many?

22 A I don't.

23 Q Okay. Was it more than 20?

24 A I don't think so, but I don't know.

10:36:34 25 Q Okay. Would you say it was between 15 and

10:36:38 1 30?

2 A I'd really have to go back and review all  
3 my time.

4 Q Okay. How would you go about doing that?

10:36:50 5 A Well, I would probably have to see the  
6 records or maybe look at the -- I don't know. I  
7 don't know.

8 Q Would you look at the C files?

9 A If I had to.

10:37:03 10 Q Okay. And that's the only way you would  
11 be able to remember specifically, correct?

12 A Probably.

13 Q Okay. So when an allegation was made,  
14 there would be some type of entry or some type of  
10:37:14 15 document or something like that in the C file to  
16 record that; is that right?

17 A Yes.

18 Q Okay. And did you do that as the Vicar  
19 for Clergy?

10:37:25 20 A Yes.

21 Q And when did you first learn that when an  
22 allegation of misconduct with a child or minor came  
23 up, that you were to record that in the C file? How  
24 did you learn how to do that?

10:37:43 25 A Well, when I came into the Archdiocese,

10:37:44 1 there were C files, there were confidential files.

2 Q All right. But my question is, how did  
3 you -- who taught you that that's where material  
4 related to childhood sexual abuse allegations was to  
5 go versus the personnel files or somewhere else?

10:38:00

6 A I concluded if it was a confidential  
7 matter, it would go into the C file.

8 Q It was just common sense?

9 A I think so, yes.

10:38:14

10 Q Okay. Who else besides you, Bishop, had  
11 access to the C files during the years you were  
12 Vicar for Clergy?

13 A The Cardinal had and my administrative  
14 assistant had.

10:38:27

15 Q When an allegation of childhood sexual  
16 abuse came up, was it your custom and practice  
17 during the times you were Vicar for Clergy to alert  
18 the Cardinal?

19 A When any problem about a priest came up, I  
20 alerted the Cardinal.

10:38:43

21 Q And how did you go about doing that?

22 A Either by memo or by personal.

23 Q And did you have regular access to him?

24 A Yes, I did.

10:38:52

25 Q Okay. And in terms of the disposition of



10:38:55 1 what was going to happen to that priest, did you  
2 discuss that with the Cardinal or did you make that  
3 decision on your own?

4 A I discussed it with the Cardinal.

10:39:09 5 Q And you always discussed it with the  
6 Cardinal; is that correct?

7 A To the best of my knowledge, yes.

8 Q When you were dealing with childhood  
9 sexual abuse --

10:39:17 10 A Yes.

11 Q -- how many priests are you aware of that  
12 the Archdiocese reported to the police or Child  
13 Protective Services or any law enforcement agency  
14 between 1986 and 1990, when you were Vicar for  
15 Clergy?

16 A I don't remember that.

17 Q Do you remember that happening at all?

18 A Yes, I remember that the law was passed  
19 and that we were concerned that people who were  
20 mandated reporters would report them.

10:39:53 21 Q Okay. But my question is a little  
22 different. I appreciate that answer.

23 Did the Archdiocese, did anybody in  
24 the administrative office, you, the Cardinal, the

10:40:06 25 Vicar General, the Chancellor or anybody in the

10:40:10 1 administrative staff ever either yourself report or  
2 direct anyone to report, when allegations came to  
3 your attention during the years you were Vicar for  
4 Clergy?

10:40:22 5 A I can't answer that question because there  
6 are two parts to it.

7 Q Okay. Why don't you -- well, did you, the  
8 Cardinal, the Vicar General or the Chancellor,  
9 during the years you were Vicar for Clergy, ever  
10:40:38 10 report any priests to the police who was accused of  
11 molesting children?

12 A No, not that I remember.

13 Q Do you know of anybody else at the  
14 Archdiocese who was directed to report during the  
10:40:52 15 years you were Vicar for Clergy allegations of  
16 childhood sexual molestation that came to the  
17 Archdiocese's attention?

18 A We were concerned always that if there  
19 were mandated reporters, that they would be informed  
10:41:04 20 to report it.

21 Q Okay. I appreciate that and I understand  
22 your answer. My question's a little different.

23 What I'm asking you is, did you  
24 direct anybody, whether they were a mandated  
10:41:17 25 reporter or not, you being the senior staff at the

10:41:20 1 Archdiocese during the years were you Vicar for  
2 Clergy, did you direct anybody to report to the  
3 police an allegation of childhood sexual molestation  
4 by a priest?

10:41:32 5 A I checked that I remember -- on one  
6 occasion, I checked that an allegation had been  
7 reported.

8 Q Do you remember who that was?

9 A Yes. It had to do with a priest who was  
10:41:43 10 accused, [REDACTED].

11 Q [REDACTED]?

12 A Yes.

13 Q And who reported it?

14 A I believe the principal of the school  
10:41:55 15 reported it.

16 Q What school, do you remember?

17 A I would be guessing.

18 Q Okay. Did the Archdiocese direct the  
19 principal to report or did she report it on her own?

10:42:10 20 A I don't know that question -- that answer.

21 Q Okay. When you say that there -- you were  
22 always concerned that a mandated reporter reports,  
23 do you remember giving that testimony a few moments  
24 ago?

10:42:31 25 A Yes.

10:42:32 1 Q What do you mean by that?  
2 A I mean that I was concerned that we would  
3 abide by the law.  
4 Q Okay. And I think I know the answer to  
10:42:44 5 it, but I want to ask it any way. Why were you  
6 concerned about that?  
7 A We wanted to abide by the law.  
8 Q Who was the Archdiocese's outside lawyer  
9 during the years you were Vicar for Clergy?  
10:43:08 10 A [REDACTED] was a lawyer. I don't  
11 remember who else.  
12 Q Do you know how many allegations of sexual  
13 misconduct by priests were settled, civil  
14 allegations or claims were settled during the years  
10:43:27 15 you were Vicar for Clergy?  
16 A No, I don't.  
17 Q Do you have an estimate?  
18 A I don't. I don't remember.  
19 Q Were there claims that came up, Your  
10:43:35 20 Excellency, about that from '86 to '90?  
21 A There were allegations.  
22 Q That's what I mean. Do you remember how  
23 many of those came up where money was paid to  
24 resolve?  
10:43:53 25 A No, I don't.

10:43:55 1 Q Who do you think would know the answer to  
2 that?

3 A I really don't know.

4 Q Do you know how many priests in the four  
10:44:15 5 years that you served as Vicar for Clergy that were  
6 serving in any type of ministerial capacity who had  
7 previous allegations made against them?

8 A I was five years as Vicar for Clergy.

9 Q I'm sorry. Thank you.

10:44:31 10 A The number of priests --

11 Q Uh-huh.

12 A -- who were serving?

13 Q Who were serving, who had allegations  
14 against them involving minors.

10:44:39 15 A No, I don't have that number.

16 Q Was it more than 20?

17 A I couldn't say that.

18 Q Could it be more than 20?

19 A I can't really answer that question.

10:44:59 20 Q Were you ever concerned while you were  
21 serving for Vicar for Clergy, that there were  
22 priests who had molested kids that were still  
23 serving in ministry?

24 A Yes.

10:45:13 25 Q Why were you concerned about that?

10:45:14 1 A Because I think it's a very bad thing to  
2 happen.

3 Q Did you tell the Cardinal you thought it  
4 was a bad idea?

10:45:20 5 A Well --

6 MR. WOODS: I'm going to object to the  
7 form of the question. If you just clarify, what was  
8 the bad idea?

9 MR. MANLY: I think that question's pretty  
10:45:35 10 clear. He testified that he thought it was a bad  
11 idea that priests serving ministry who had been --  
12 who had molested kids.

13 THE WITNESS: I didn't have -- there is a  
14 difference between allegations and knowledge that  
10:45:49 15 they molested children.

16 BY MR. MANLY:

17 Q Okay. Do you know of any priests -- how  
18 many priests served in ministry who had been removed  
19 from ministry and then returned because of  
10:46:00 20 allegations of sexual abuse?

21 MR. WOODS: During his time?

22 MR. MANLY: Correct.

23 THE WITNESS: There were a number.  
24 Michael Baker was one.

25

10:46:17 1 BY MR. MANLY:

2 Q How many, do you know?

3 A I can remember two at the moment.

4 Q Who else besides Mike Baker?

10:46:28 5 A Michael Wempe.

6 Q Did you believe while you were Vicar for  
7 Clergy that Michael Wempe had previously abused  
8 kids?

9 A I hadn't, no.

10:46:40 10 MR. WOODS: I would object. Is there some  
11 relevance of Michael Wempe to this case or are you  
12 going now past --

13 MR. MANLY: I think anybody -- I think  
14 that if I have other priests serving in ministry who  
10:46:54 15 are molesters, it's calculated to lead to the  
16 discovery of admissible evidence during that same  
17 time period that Father Baker served and I think I'm  
18 entitled to it.

19 MR. WOODS: What my concern is, there  
10:47:05 20 might be some Michael Wempe cases out there with  
21 lawyers who might want to ask questions about this  
22 and I would like to do it all at once.

23 It's unfair to have a hierarchy witness  
24 who deals with lots of cases be noticed in one case and  
10:47:20 25 then asked questions in the other.

10:47:23 1 I'll let it go on for a little bit  
2 longer, but you've spent a lot of time now on background  
3 and policy and history and not much on Baker.  
4 MR. MANLY: Don --

10:47:35 5 MR. WOODS: I would like you to move on.  
6 MR. MANLY: -- I'm going to take the  
7 deposition exactly as I see fit. If you choose to  
8 instruct him not to answer, that's your prerogative,  
9 but you are not going to direct me on how to take  
10:47:44 10 the deposition so -- okay. What was my last  
11 question?  
12 (Record read.)  
13 MR. MANLY: You can answer.  
14 THE WITNESS: I had no evidence that  
10:48:04 15 Michael Wempe had abused children.  
16 BY MR. MANLY:  
17 Q Did you believe Michael Baker had abused  
18 kids?  
19 A He told me he had.  
10:48:14 20 Q Okay. And had you ever heard anything  
21 like that before regarding priests?  
22 MR. WOODS: Object to the form of the  
23 question in the term, "like that," is vague and  
24 ambiguous.  
10:48:34 25 MR. MANLY: You can answer.



10:48:34 1 THE WITNESS: As Vicar for Clergy, I don't  
2 remember that I had any other accusation of abuse of  
3 children.  
4 BY MR. MANLY:  
10:48:41 5 Q How about just in your priesthood  
6 previously, had you ever heard or come to understand  
7 that any other priests had ever molested a child?  
8 MR. WOODS: Object to the form of the  
9 question and it is compound. Have you ever heard or  
10:48:53 10 did you understand?  
11 MR. MANLY: You can answer.  
12 THE WITNESS: I read publicity about one  
13 priest.  
14 BY MR. MANLY:  
10:49:01 15 Q Who was that?  
16 A Pat Roemer.  
17 MR. WOODS: What --  
18 MR. MANLY: Father Roemer.  
19 BY MR. MANLY:  
10:49:09 20 Q When did Father Roemer leave the ministry,  
21 Bishop, if you remember?  
22 A I don't remember the exact date.  
23 Q Was it before or after you became Vicar  
24 for Clergy?  
10:49:19 25 A I believe it was before.

10:49:20 1 Q Okay. When did Michael Baker tell you  
2 that he molested a child?

3 A I believe it was at the end of 1986.

4 Q And where did that occur, if you recall?

10:49:35 5 A In my office.

6 Q In your office in the Archdiocese?

7 A Yes.

8 Q And how did it come that Michael Baker  
9 came to your office and had that discussion with  
10 you? How did that come to pass?

11 A Because I was the Vicar for the clergy.

12 Q Okay. Well, I mean, he didn't strut into  
13 your office one day and say, "I molested a child."  
14 I'm trying to get some background on it.

10:50:01 15 Maybe he did, but I'm just trying to get  
16 some background on how he ended up in your office  
17 discussing this with you.

18 A Oh, okay. At the retreat for the priests  
19 in June of 1986, Cardinal Mahony had a presentation  
10:50:14 20 on the problem of child abuse among the clergy and  
21 as part of that, he had encouraged any priest who's  
22 experienced that kind of difficulties to come  
23 forward and to speak to him confidentially and that  
24 we would get him the help that he needed.

10:50:40 25 And then Michael Baker went for I believe

10:50:43 1 a course or a sabbatical for some months and I think he  
2 reflected on his situation and decided to come in  
3 response to the Cardinal's request.

4 Q So did he report to the Cardinal first or  
10:50:55 5 to you?

6 A He reported to me.

7 Q Okay. And when was that, do you recall?

8 A At the end of 1986.

9 Q So approximately December?

10:51:04 10 A Yes.

11 Q Okay. And can you tell me what he said to  
12 you?

13 A I don't remember the exact conversation.

14 Q What about the gist of what he said?

10:51:17 15 A He told me that in response to the  
16 Cardinal's request and that his own reflection on  
17 the matter, that he wanted to come in and report  
18 that he had had inappropriate relationships with, I  
19 believe, two boys.

10:51:30 20 Q And how old were these boys?

21 A I don't remember him telling me.

22 Q And where did he say this had happened?

23 A I don't remember where he said, that we  
24 talked about that.

10:51:41 25 Q Okay. And what were the names of the

10:51:43 1 boys?

2 A I remember one name he gave was [REDACTED].

3 Q Did you write down the names?

4 A I don't remember that.

10:51:53 5 Q Okay. And do you remember what parish  
6 this occurred at?

7 A No.

8 Q Did anybody at any point from the  
9 Archdiocese reach out to the boys -- the families he  
10 identified?

10:52:06

11 A He told me that at least one of the boys  
12 was gone back to Mexico.

13 Q Okay. Did you try to find him in Mexico?

14 A No.

10:52:30 15 Q And what did he say -- what did he say he  
16 had done to them?

17 A Oh, he just said that he had inappropriate  
18 relationships with them.

19 Q Okay. And did you understand that to mean  
20 he had sexual relationships with them?

10:52:41

21 A Yes.

22 Q And what was his affect when he was  
23 telling you this?

24 A Pardon?

10:52:51 25 Q What was his affect? What was his

10:52:53

1 appearance, his body language, his affect?

2 MR. WOODS: Objection to the form of the  
3 question as confusing.

4 THE WITNESS: I don't remember. I don't  
5 remember.

10:53:03

6 BY MR. MANLY:

7 Q Did he act sad? Did he act happy? Was he  
8 clinical? What do you recall about that?

9 MR. WOODS: Object to the form of the  
10 question. Calls for speculation as to emotional  
11 state or state of mind of the other person.

10:53:12

12 MR. MANLY: You can answer.

13 THE WITNESS: I don't remember.

14 BY MR. MANLY:

10:53:22

15 Q Did you get mad at him?

16 A No.

17 Q What did you say?

18 A I don't remember exactly what I said. I  
19 don't remember.

10:53:29

20 Q What was the gist of what you said?

21 A Normally, in such a case, I would say I  
22 would have to bring this to the attention of the  
23 Cardinal and get back to him.

24 Q Had you met with other priests before

10:53:41

25 Father Baker who had allegations against them or

10:53:46 1 disclosed allegations?

2 A No, I don't believe I did. I don't  
3 remember if I had.

4 Q So this was the first one?

10:53:51 5 A I believe it was, yes.

6 Q Were you shocked?

7 A I was surprised, yes.

8 Q And why were you surprised, Bishop?

9 A I'm always surprised when a priest says  
10:54:10 10 they have an inappropriate -- abusive relationships  
11 with children.

12 Q And did you ask, you know, what he did or  
13 how many times or anything of that nature?

14 A No.

10:54:25 15 MR. WOODS: Object to the form of the  
16 question; compound, vague and ambiguous.

17 MR. MANLY: You can answer.

18 THE WITNESS: No.

19 BY MR. MANLY:

10:54:37 20 Q Why not?

21 A I believe that we were going to send him  
22 to treatment and that those matters would be dealt  
23 with as part of the treatment.

24 Q And how did you know that, if this was the  
10:54:47 25 first case you had handled?

10:54:48 1 A Because we would normally send somebody to  
2 treatment who had serious problems.

3 Q And did you believe in 1986, that you  
4 could be cured of molesting children?

10:55:02 5 A I don't know that I had any belief about  
6 that.

7 Q Now, when he told you this, did you know  
8 that in 1986 that molesting a child -- sorry -- let  
9 me start over. I didn't mean -- I'm conscious of  
10:55:19 10 it, Don.

11 Did you know in 1986 that molesting a  
12 child was a crime?

13 A Yes.

14 Q Did you call the police?

10:55:29 15 A No.

16 Q Why?

17 A He came in under a confidential agree- --  
18 a confidential understanding with the church  
19 confessing to something that he had done and I  
10:55:43 20 believed that that was a confidential matter.

21 Q So if he had come in and told you that he  
22 had slaughtered a family, would you have called the  
23 police?

24 MR. WOODS: Object to the form of the  
10:55:56 25 question --

10:55:57

1

MR. MANLY: Let me rephrase it.

2

BY MR. MANLY:

3

Q If he had come in and told you he had  
murdered children, would you have called the police?

4

10:56:03

5

A I don't know what I would have done in  
that I never dealt with such a thing.

6

7

Q But you understood that it was part of  
Mahony's desire to deal with this personally; is  
that correct?

8

9

10:56:16

10

MR. WOODS: Object to the form of the  
question as calling for the state of mind or  
thinking of the Cardinal. Unless expressed --

11

12

13

MR. MANLY: I'll withdraw it. I'll  
withdraw it. Let me rephrase it.

14

10:56:24

15

BY MR. MANLY:

16

Q In any event, you didn't call the police?

17

A No.

18

Q Did you talk to the Cardinal about calling  
the police?

19

10:56:30

20

A I don't remember doing so.

21

Q Okay. Was there a meeting -- was there --  
let me ask you this, let's take it in order.

22

23

Are you doing okay?

24

A Yes.

10:56:47

25

Q What did you do after Father Baker told



10:56:50 1 you this and then left your office?  
2 A I contacted the Cardinal.  
3 Q And how did you go about doing that, sir?  
4 A I don't remember.  
10:56:56 5 Q And so you contacted the Cardinal.  
6 Do you recall writing a memo or did  
7 you knock on his door or how did that work?  
8 A I just don't remember.  
9 Q Okay. Do you remember ever talking to the  
10:57:11 10 Cardinal about this?  
11 A I know I talked to the Cardinal.  
12 Q Okay. And what did you say?  
13 A I can't remember the conversations.  
14 Q What was the gist of what you said?  
10:57:21 15 A I told him about what Michael Baker came  
16 in and told me.  
17 Q What did he say?  
18 A I believe that he said we had to have a  
19 meeting with Michael Baker, but I'm --  
10:57:33 20 Q So did you and the Cardinal or other --  
21 and/or others have a meeting with Father Baker?  
22 A The Cardinal and I had a meeting with  
23 Michael Baker.  
24 Q Was [REDACTED] present at that  
10:57:44 25 meeting?

10:57:45 1 A Not that I remember.  
2 Q Okay. And what was said?  
3 A What I remember is that we said that he  
4 would need to be removed from ministry right away  
10:57:57 5 and that he would be sent to treatment.  
6 Q And where did that meeting take place?  
7 A I believe it took place in the Cardinal's  
8 office.  
9 Q Okay. And when you say, "sent to  
10:58:14 10 treatment," what do you mean?  
11 A That he would be sent to a residential  
12 treatment facility.  
13 Q And what was he going to be treated for?  
14 A For the problems that he had confessed to.  
10:58:29 15 Q Meaning molesting kids?  
16 A Yes.  
17 Q So he was going to go to treatment to get  
18 him to stop molesting kids?  
19 A Yes.  
10:58:35 20 Q All right. Had he had therapy of any type  
21 that you know of prior to him coming to see you  
22 about this matter?  
23 A I don't know that.  
24 Q Okay. And how did -- who selected where  
10:58:52 25 he was going to go to get this treatment?

10:58:56 1 A I probably did.

2 Q Okay. And how did you -- where did you

3 send him?

4 A We sent him to a facility that -- Servants

10:59:04 5 of the Paraclete in Jemez Springs, New Mexico.

6 Q And what is Servants of the Paraclete?

7 A It's a religious community.

8 Q It's a group of priests and brothers?

9 A Yes.

10:59:21 10 Q And what do they do?

11 A What I knew of, that they ran that

12 facility.

13 Q Did they treat -- did you understand that

14 the boys he molested were younger than 12 years old

10:59:35 15 or older than 12 years old?

16 A No, I didn't.

17 Q You don't know?

18 A No.

19 Q Did anybody ask him how old the children

10:59:45 20 were?

21 A Not at that time.

22 Q Did the Cardinal ask him what he had done

23 with these boys?

24 A I don't remember that.

10:59:51 25 Q Did the Cardinal ask him the names of the

10:59:53

1 boys?

2 A Again, I don't remember.

3 Q Did you ever discuss with the Cardinal the  
4 need to find these boys so they could get some help?

11:00:02

5 A I don't remember doing that.

6 Q You don't remember the Cardinal ever  
7 instructing you that these families needed to be  
8 found, that he had -- these children he had  
9 molested, so he could get the kids -- so the

11:00:18

10 Archdiocese could help these boys?

11 A I don't remember that.

12 Q Okay. When you sent him to the Servants  
13 of the Paraclete, were you worried they might -- or  
14 did you discuss with him the possibility they might  
15 report it --

11:00:30

16 MR. WOODS: I'm going to object, compound.

17 MR. MANLY: I haven't finished my  
18 question.

19 MR. WOODS: Oh, sorry.

11:00:35

20 MR. MANLY: That's okay.

21 BY MR. MANLY:

22 Q When you sent Father Baker to the Servants  
23 of the Paraclete or told him he was going to be sent  
24 there, in your mind, did you ever have concerns or  
25 questions as to whether they would report him to law

11:00:48

11:00:50 1 enforcement?

2 A No, I wasn't thinking of that.

3 Q Okay. How many priests over the years has  
4 the Archdiocese, in terms of your knowledge or your

11:01:02 5 time in administration, sent to that facility?

6 A I couldn't answer that.

7 Q Okay. Did you have any expectation as to  
8 whether they would or would not report him to the  
9 police when you sent Father Baker there?

11:01:19 10 A That wasn't on my mind.

11 Q Okay. Did you or the Cardinal ever  
12 discuss whether they would report?

13 A I don't remember that.

14 Q Okay. Did you and the Cardinal ever

11:01:40 15 discuss whether it would be appropriate to call

16 Child Protective Services or the police on  
17 Father Baker?

18 A No, I don't think so.

19 Q Okay. Was there ever a discussion about

11:01:51 20 notifying the parishes or the places that

21 Father Baker had served prior to coming to see you, to  
22 see if there were other people that he had hurt that the  
23 Archdiocese could give help to?

24 A No.

11:02:09 25 Q Did you understand that the paracletes

11:02:11 1 were -- one of their jobs was to treat or offer  
2 treatment for sexual abusers of children?

3 A Yes.

4 Q And how did you first learn about the  
11:02:20 5 Servants of the Paraclete?

6 A I don't recall where I learned about it.

7 Q When you spoke to the Cardinal about this  
8 matter and Father Baker, did he already know the  
9 Servants of the Paraclete facility existed?

11:02:44 10 MR. WOODS: Objection; calls for state of  
11 mind, unless he expressed it to you.

12 MR. MANLY: You can answer.

13 THE WITNESS: I don't understand the --  
14 BY MR. MANLY:

11:02:50 15 Q Let me ask it this way, you didn't have to  
16 explain to the Cardinal what the Servants of the  
17 Paraclete was in the Baker case, did you?

18 MR. WOODS: It's a negative pregnant  
19 question.

11:03:01 20 MR. MANLY: Wait. A negative pregnant  
21 question? Okay. Just want to make sure that got on  
22 the record. I've got a good response for that, but  
23 I would probably get sanctioned. Okay.

24 BY MR. MANLY:

11:03:14 25 Q Did the Cardinal know what the Servants of

11:03:17 1 the Paraclete was? Did he seem familiar with it  
2 when you were talking to him about it in the Baker  
3 case?

4 MR. WOODS: Object; the question's  
11:03:25 5 confusing, compound, calls for the state of mind of  
6 another person, unless he expressed it.

7 MR. MANLY: I really, really want you to  
8 stop coaching the witness. Okay. You can object.  
9 Stop coaching the witness. Go ahead.

11:03:39 10 MR. WOODS: It was an objection.

11 THE WITNESS: I believe the Cardinal was  
12 aware of the existence of the Servants of the  
13 Paraclete.

14 BY MR. MANLY:

11:03:48 15 Q Why do you say that?

16 A It was a well-known treatment facility.

17 Q Okay. Now, when you told -- when

18 Father Baker was meeting with you and the Cardinal, what  
19 was his affect there? How did he appear to you? Was he

11:04:09 20 happy, sad?

21 A I don't remember.

22 Q Did anybody scold him in the meeting?

23 A I don't remember that.

24 Q Do you remember the Cardinal saying

11:04:21 25 anything to him about what he had done?

11:04:24 1 A I don't remember the conversations at that  
2 meeting.

3 Q All right. Did anybody from the  
4 Archdiocese visit Baker while he was at the  
11:04:36 5 Paracletes?

6 A Yes.

7 Q Who did?

8 A I did.

9 Q So you physically went to Jemez Springs  
11:04:42 10 and met with him?

11 A Yes.

12 Q Okay. And how many times did you do that  
13 while he was staying there?

14 A I was there once, but I may have been  
11:04:49 15 there more.

16 Q Who was the travel agent for the  
17 Archdiocese in those years?

18 A Oh, I don't remember.

19 Q Now, when you went there, were you  
11:05:04 20 visiting just Father Baker or were there other  
21 priests there as well?

22 A There were other priests there as well.

23 Q How many? Do you remember?

24 A I remember two others.

11:05:15 25 Q Who was there?



11:05:16 1 A [REDACTED] was there.  
2 Q Okay.  
3 A And I can't remember -- I can't remember  
4 if they were there at the time I visited Baker.  
11:05:27 5 Q And Father [REDACTED] had been [REDACTED]  
6 [REDACTED] for the Archdiocese?  
7 MR. WOODS: I'm sorry. Could I hear the  
8 question back?  
9 MR. MANLY: I'll say it again, Don.  
11:05:37 10 BY MR. MANLY:  
11 Q Father [REDACTED] had been [REDACTED]  
12 [REDACTED] for the Archdiocese?  
13 A Perhaps.  
14 Q Did Father [REDACTED] come forward in or  
11:05:48 15 around the same time Father Baker did?  
16 A I don't remember the time sequence.  
17 Q And it may be pronounced [REDACTED], but it's  
18 [REDACTED]; is that right?  
19 A Well, he was called [REDACTED].  
11:06:10 20 Q Okay.  
21 A It's probably [REDACTED]. I don't know.  
22 Q I've seen it in the directory both ways,  
23 but phonetically it's [REDACTED] right?  
24 A Right.  
11:06:24 25 Q Do you remember anybody else being there

11:06:24

1 besides [REDACTED] and Baker?

2 A Those are the ones I remember at the  
3 moment.

11:06:34

4 Q In terms of the way the paracletes worked,  
5 did you go shortly after he had been admitted and  
6 visit?

7 MR. WOODS: Object to the form of the  
8 question in that the preamble --

9 MR. MANLY: Let me rephrase.

11:06:45

10 MR. WOODS: -- has nothing to do with the  
11 question.

12 BY MR. MANLY:

11:06:53

13 Q There was a protocol you as the Vicar for  
14 Clergy representing the Ordinary of the priests were  
15 to follow when a priest was in treatment at the  
16 Paracletes, is that right, or they wanted you to  
17 follow any way?

18 A I think so.

11:07:03

19 MR. WOODS: I'm going to object to the  
20 form of the question. When you say "they" wanted  
21 you to follow, who is "they?"

22 MR. MANLY: Paracletes.

23 THE WITNESS: I don't remember any  
24 specific protocol that they had.

25