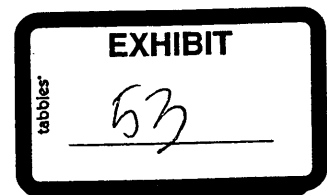


SUPPLEMENTAL INTERROGATORY NO. 1: Please identify the witnesses and documents with information about the Diocese's Response to the Request for Admission No. 12 served in this case on June 18, 2003 and the Response to Request for Admission No. 13 in John Doe II vs. Janssen, Bass and Diocese of Davenport, Clinton County Law No. LA 29867, which was served on November 21, 2003. In regard to the phrase in Response to Request No. 13 in Law No. LA 29867 that "The records indicate that some allegations were made prior to 1967", please state the following:

- A) The name, identity and location of what files or records were located to form the basis for this statement;
- B) The identity of each and every person who assisted in locating such records;
- C) The date, time and place when any such records were located;
- D) The reason or explanation why these records were not located in responding to Request for Admission No. 12 in LA 29513;
- E) Any written documents or memorandum prepared discussing the location, discovery or maintenance of the records described in this phrase;
- F) Whether there is any other location of any other records or documents that would contain or document any allegations made against Father James Janssen having sexual contact with minor children.

ANSWER:

(A)-(F) The Response to Request No. 12 served June 18, 2003, was based upon information found in a Fr. Janssen file kept with other priest files located in the Diocesan offices. Prior to July 16, 2003, Irene Prior Loftus, Chancellor of the Diocese of Davenport, who was working with counsel on discovery requests, understood that the Diocese did not have any materials in a "secret archive". CODE OF CANON LAW, 1983 revision, Canon 486 requires that each Diocese be responsible to have an archives where all important documents of the see are gathered and properly arranged and secured. Canons 489 and 490 refer to "secret archives",



ANSWER TO SUPPLEMENTAL INTERROGATORY NO. 1  
CONTINUED

which simply refers to a requirement that certain documents be kept secret and protected most securely with access being restricted.

In responding to a Request for Production for "secret archives" in this case, Diocese personnel decided to try to open an old safe downstairs at the Chancery. Diocese personnel did not believe that they even had the combination to the safe. A piece of paper that had been given to Ms. Loftus was believed by her to contain the combination to the outside door of the regular archives, which Ms. Loftus had never used. Monsignor Michael Morrissey informed Ms. Loftus that the combination had been given to the Bishop and the Vicar General. The combination was found in the papers in Ms. Loftus' possession. Deacon David Montgomery and Ms. Loftus tried that combination on the safe and it opened. Deacon David Montgomery opened the safe and they located additional documents about Fr. Janssen, which led to the Response to Request No. 13.

Ms. Loftus prepared a privileged and confidential memorandum about the discovery of these documents, written to counsel, Charles E. Miller, at his direction and request.

There are no known other documents about allegations against Fr. Janssen.