

REQUEST NO. 4

By 1977, you were the highest ranking cabinet-level priest in terms of authority at the RCAB, with the exception of the late Cardinal Humberto Medeiros ("Cardinal Medeiros").

RESPONSE NO. 4

As stated, can neither admit nor deny the same.

REQUEST NO. 5

During your tenure as Vicar General, Auxiliary Bishop, and/or Chancellor at the RCAB, from around 1973 to around 1984, there was no written RCAB policy concerning the protection of children from sexual abuse by RCAB priests.

RESPONSE NO. 5

Admit.

REQUEST NO. 6

During your tenure as Vicar General, Auxiliary Bishop, and/or Chancellor at the RCAB, from around 1973 to around 1984, there was no RCAB policy to notify the police of claims of sexual abuse by RCAB priests.

RESPONSE NO. 6

Admit.

REQUEST NO. 7

During your tenure as Vicar General, Auxiliary Bishop, and/or Chancellor at the RCAB, from around 1973 to around 1984, you knew the RCAB served tens of thousands of children in RCAB-sponsored programs, including schools and CCD classes.

RESPONSE NO. 7

Admit.

REQUEST NO. 8

In May of 1973, you knew that Charles Lerrigo, of the Boston Phoenix, reported to Father William Helmick that Father Shanley was making statements about so-called ceremonies of commitment or homosexual unions, which were contrary to the teachings of the RCAB (the "Lerrigo Report").

RESPONSE NO. 8

Admit.

REQUEST NO. 9

You did not review the RCAB's Files on Father Shanley in response to the Lerrigo Report.

RESPONSE NO. 9

Admit.

REQUEST NO. 10

You did not speak with Father Shanley in response to the Lerrigo Report.

RESPONSE NO. 10

Admit.

REQUEST NO. 11

You did not investigate the Lerrigo Report.

RESPONSE NO. 11

Admit.

REQUEST NO. 12

In March of 1974, you knew that Thomas J. Flatley sent a letter to Cardinal Medeiros containing very serious complaints about Father Shanley (the "Flatley Letter").

RESPONSE NO. 12

Admit.

REQUEST NO. 13

A true and accurate copy of the Flatley Letter is attached as Exhibit "1" hereto.

RESPONSE NO. 13

Admit.

REQUEST NO. 14

You did not review the RCAB's Files on Father Shanley in response to the Flatley Letter.

RESPONSE NO. 14

Admit.

REQUEST NO. 15

You did not speak with Father Shanley in response to the Flatley Letter.

RESPONSE NO. 15

Admit.

REQUEST NO. 16

You did not investigate the very serious complaints contained in the Flatley Letter.

RESPONSE NO. 16

Admit.

REQUEST NO. 17

In March of 1974, you knew that the Brockton Enterprise reported that Father Shanley made statements concerning homosexuality, which were contrary to the teachings of the RCAB (the "Enterprise Article").

RESPONSE NO. 17

Admit.

REQUEST NO. 18

You did not review the RCAB's Files on Father Shanley in response to the Enterprise Article.

RESPONSE NO. 18

Admit.

REQUEST NO. 19

You did not speak with Father Shanley in response to the Enterprise Article.

RESPONSE NO. 19

Admit.

REQUEST NO. 20

You did not investigate whether Father Shanley had made the statements reported in the Enterprise Article.

RESPONSE NO. 20

Admit.

REQUEST NO. 21

In March of 1974, you received a letter from Dianne M. Adams reporting that Father Shanley made statements concerning homosexuality, which were contrary to the teachings of the RCAB (the "Adams Letter").

RESPONSE NO. 21

Admit.

REQUEST NO. 22

A true and accurate copy of the Adams Letter is attached as Exhibit "2" hereto.

RESPONSE NO. 22

Admit.

REQUEST NO. 23

You did not review the RCAB's Files on Father Shanley in response to the Adams Letter.

RESPONSE NO. 23

Admit.

REQUEST NO. 24

You did not speak with Father Shanley in response to the Adams Letter.

RESPONSE NO. 24

Admit.

REQUEST NO. 25

You did not investigate whether Father Shanley had made the statements referenced in the Adams Letter.

RESPONSE NO. 25

Admit.

REQUEST NO. 26

In April of 1974, you received a letter from Reverend Arthur L. Reardon, a former classmate, with attached newspaper articles, reporting that Father Shanley made statements about homosexuality, which were contrary to the teachings of the RCAB (the "Reardon Letter").

RESPONSE NO. 26

Admit.

REQUEST NO. 27

A true and accurate copy of the Reardon Letter with enclosures is attached as Exhibit "3" hereto.

RESPONSE NO. 27

Admit.

REQUEST NO. 28

When you responded to the Reardon Letter, on April 30, 1974, you were concerned about Father Shanley.

RESPONSE NO. 28

Admit.

REQUEST NO. 29

You did not review the RCAB's Files on Father Shanley in response to the Reardon Letter.

RESPONSE NO. 29

Admit.

REQUEST NO. 30

You did not speak with Father Shanley in response to the Reardon Letter.

RESPONSE NO. 30

Admit.

REQUEST NO. 31

You did not investigate whether Father Shanley had made the statements referenced in the Reardon Letter and its enclosures.

RESPONSE NO. 31

Admit.

REQUEST NO. 32

In April of 1974, you received a letter from Joseph J. Reilly, with attached newspaper article, reporting that Father Shanley made statements about homosexuality, which were contrary to the teachings of the RCAB (the "Reilly Letter").

RESPONSE NO. 32

Admit.

REQUEST NO. 33

A true and accurate copy of the Reilly Letter with enclosure is attached as Exhibit "4" hereto.

RESPONSE NO. 33

Admit.

REQUEST NO. 34

You did not review the RCAB's Files on Father Shanley in response to the Reilly Letter.

RESPONSE NO. 34

Admit.

REQUEST NO. 35

You did not speak with Father Shanley in response to the Reilly Letter.

RESPONSE NO. 35

Admit.

REQUEST NO. 36

You did not investigate whether Father Shanley had made the statements referenced in the Reilly Letter and its enclosure.

RESPONSE NO. 36

Admit.

REQUEST NO. 37

In May of 1974, you knew that Mr. and Mrs. Joseph A. Melia wrote a letter to Cardinal Medeiros concerning remarks reportedly made by Father Shanley at Merrimack College, which were contrary to the teachings of the RCAB (the Melia Letter”).

RESPONSE NO. 37

Admit.

REQUEST NO. 38

A true and accurate copy of the Melia Letter is attached as Exhibit “5” hereto.

RESPONSE NO 38

Admit.

REQUEST NO. 39

You did not review the RCAB’s Files on Father Shanley in response to the Melia Letter.

RESPONSE NO. 39

Admit.

REQUEST NO. 40

You did not speak with Father Shanley in response to the Melia Letter.

RESPONSE NO. 40

Admit.

REQUEST NO. 41

You did not investigate whether Father Shanley had made the remarks referenced in the Melia Letter.

RESPONSE NO. 41

Admit.

REQUEST NO. 42

As of May of 1974, you considered Father Shanley to be a "troubled" priest, i.e., a priest who is disturbed in one sort or another.

RESPONSE NO. 42

Admit.

REQUEST NO. 43

As of May of 1974, you did not review the RCAB's Files on Father Shanley.

RESPONSE NO. 43

Admit.

REQUEST NO. 44

As of May of 1974, you did not ask anyone to review the RCAB's Files on Father Shanley.

RESPONSE NO. 44

Admit.

REQUEST NO. 45

During your tenure as Vicar General, Auxiliary Bishop, and/or Chancellor at the RCAB, from around 1973 to around 1984, you could have reviewed the RCAB's Files on Father Shanley.

RESPONSE NO. 45

Admit.

REQUEST NO. 46

In May of 1975, you knew that Thomas J. Flatley wrote another letter to Cardinal Medeiros concerning alleged actions by Father Shanley, which were contrary to the teachings of the RCAB (the "Second Flatley Letter").

RESPONSE NO. 46

Admit.

REQUEST NO. 47

A true and accurate copy of the Second Flatley Letter is attached as Exhibit "6" hereto.

RESPONSE NO. 47

Admit.

REQUEST NO. 48

You did not review the RCAB's Files on Father Shanley in response to the Second Flatley Letter.

RESPONSE NO. 49

Admit.

REQUEST NO. 50

You did not investigate whether Father Shanley had engaged in the alleged actions referenced in the Second Flatley Letter.

RESPONSE NO. 50

Admit.

REQUEST NO. 51

In November or December of 1977, you knew that Jeanne D. Sweeney had written Cardinal Medeiros a letter (the "Sweeney Letter"), enclosing another letter written to Ms. Sweeney by Dolores Stevens, reporting that Father Shanley made deviant statements about pedophilia, incest, and bestiality at a church in Rochester, New York (the "Stevens Report").

RESPONSE NO. 51

Admit.

REQUEST NO. 52

A true and accurate copy of the Sweeney Letter is attached as Exhibit "7" hereto.

RESPONSE NO. 52

Admit.

REQUEST NO. 53

A true and accurate copy of the Stevens Letter is attached as Exhibit "8" hereto.

RESPONSE NO. 53

Admit.

REQUEST NO. 54

You did not speak to Ms. Stevens about the Stevens Report.

RESPONSE NO. 54

Admit.

REQUEST NO. 55

You did not speak to Ms. Sweeney about the Sweeney Letter.

RESPONSE NO. 55

Admit.

REQUEST NO. 56

You did not review the RCAB's Files on Father Shanley in response to the Sweeney Letter or Stevens Report.

RESPONSE NO. 56

Admit.

REQUEST NO. 57

You did not speak with Father Shanley in response to the Sweeney Letter or Stevens Report.

RESPONSE NO. 57

Admit.

REQUEST NO. 58

You did not investigate whether Father Shanley had made the deviant statements referenced in the Stevens Report.

RESPONSE NO. 58

Admit.

REQUEST NO. 59

In December of 1977 or January of 1978, you knew that Joseph T. Eltges had written a letter to Cardinal Medeiros reporting that Father Shanley gave a scandalous talk about homosexuality at a college in New York (the "Eltges Letter").

RESPONSE NO. 59

Admit.

REQUEST NO. 60

A true and accurate copy of the Eltges Letter is attached as Exhibit "9" hereto.

RESPONSE NO. 60

Admit.

REQUEST NO. 61

You did not review the RCAB's Files on Father Shanley in response to the Eltges Letter.

RESPONSE NO. 61

Admit.

REQUEST NO. 62

You did not speak with Father Shanley in response to the Eltges Letter.

RESPONSE NO. 62

Admit.

REQUEST NO. 63

You did not investigate whether Father Shanley gave the scandalous talk referenced in the Eltges Letter.

RESPONSE NO. 63

Admit.

REQUEST NO. 64

By 1978, you believed that Father Shanley needed psychological help.

RESPONSE NO. 64

Admit.

REQUEST NO. 65

By 1978, you believed that Father Shanley needed mental health treatment.

RESPONSE NO. 65

Admit.

REQUEST NO. 66

In April of 1979, you knew Paul J. McGeady had written Cardinal Medeiros a letter, with enclosed articles from "Gay Community News" and "Gaysweek", reporting that Father Shanley attended and spoke at a conference in Boston concerning man-boy love (the "McGeady Letter").

RESPONSE NO. 66

Admit.

REQUEST NO. 67

A true and accurate copy of the McGeady Letter with enclosures is attached as Exhibit "10" hereto.

RESPONSE NO. 67

Admit.

REQUEST NO. 68

In April of 1979, you made Cardinal Medeiros aware of the McGeady Letter.

RESPONSE NO. 68

Admit.

REQUEST NO. 69

In April of 1979, you were disturbed at the statements attributed to Father Shanley in the articles attached to the McGeady Letter.

RESPONSE NO. 69

Admit.

REQUEST NO. 70

You did nothing to get the facts as to what Father Shanley actually said at the conference referenced in the "Gaysweek" article attached to the McGeady Letter.

RESPONSE NO. 70

Admit.

REQUEST NO. 71

You did not speak to the authors of the articles attached to the McGeady Letter to determine if the statements attributed to Father Shanley in the articles were accurate.

RESPONSE NO. 71

Admit.

REQUEST NO. 72

You did not speak with Mr. McGeady about the McGeady Letter.

RESPONSE NO. 72

Admit.

REQUEST NO. 73

In April of 1979, you were concerned about Father Shanley attending the conference referenced in the "Gaysweek" article attached to the McGeady Letter.

RESPONSE NO. 73

Admit.

REQUEST NO. 74

You did nothing to verify if Father Shanley actually attended the conference referenced in the "Gaysweek" article attached to the McGeady Letter.

RESPONSE NO. 74

Admit.

REQUEST NO. 75

In April of 1979, you were aware that at the end of the conference referenced in the "Gaysweek" article attached to the McGeady Letter, it was further reported that participants caucused to form the Man Boy Lovers of North America organization.

RESPONSE NO. 75

Admit.

REQUEST NO. 76

You did nothing to verify if Father Shanley participated in the caucus referenced in the "Gaysweek" article attached to the McGeady Letter.

RESPONSE NO. 76

Admit.

REQUEST NO. 77

You did not review the RCAB's Files on Father Shanley in response to the McGeady Letter.

RESPONSE NO. 77

Admit.

REQUEST NO. 78

You did not speak with Father Shanley in response to the McGeady Letter.

RESPONSE NO. 78

Admit.

REQUEST NO. 79

In April of 1979, you knew that Cardinal Medeiros appointed Father Shanley as Associate Pastor of St. Jean's.

RESPONSE NO. 79

Admit.

REQUEST NO. 80

At the time Cardinal Medeiros appointed Father Shanley as Associate Pastor of St. Jean's you knew that Father Shanley had access to children at St. Jean's.

RESPONSE NO. 80

Admit.

REQUEST NO. 81

Cardinal Medeiros appointed Father Shanley as Associate Pastor of St. Jean's approximately six (6) days after you received the McGeady Letter.

RESPONSE NO. 81

Admit.

REQUEST NO. 82

Cardinal Medeiros appointed Father Shanley as Associate Pastor of St. Jean's after you informed him about the McGeady Letter and its enclosures.

RESPONSE NO. 82

Admit.

REQUEST NO. 83

In 1979, you owed the Plaintiffs a duty of care to protect them from foreseeable risks of harm by Father Shanley at St. Jean's.

RESPONSE NO. 83

Deny.

REQUEST NO. 84

By allowing Father Shanley to be appointed to St. Jean's as Associate Pastor you breached your duty of care owed to the Plaintiffs.

RESPONSE NO. 84

Deny.

REQUEST NO. 85

You placed no restrictions on Father Shanley's ministry at St. Jean's that would have prevented him from having access to children.

RESPONSE NO. 85

Admit.

REQUEST NO. 86

You did not recommend that any restrictions be placed on Father Shanley's ministry at St. Jean's that would have prevented him from having access to children.

RESPONSE NO. 86

Admit.

REQUEST NO. 87

You are not aware of any specific restrictions placed on Father Shanley's ministry as Associate Pastor at St. Jean's by Cardinal Medeiros that would have prevented Father Shanley from having access to children.

RESPONSE NO. 87

Admit.

REQUEST NO. 88

You are not aware of any specific restrictions placed on Father Shanley's ministry as Associate Pastor at St. Jean's by anyone at the RCAB that would have prevented him from having access to children.

RESPONSE NO. 88

Admit.

REQUEST NO. 89

In 1979, you owed the Plaintiffs a duty of care to protect them from foreseeable risks of harm by Father Shanley at St. Jean's.

RESPONSE NO. 89

Deny.

REQUEST NO. 90

By failing to place any restrictions on Father Shanley's ministry at St. Jean's you breached your duty of care owed to the Plaintiffs.

RESPONSE NO. 90

Deny.

REQUEST NO. 91

In 1982, you received a letter from Father Shanley reporting that a Brockton woman was making calls to Father Shanley and complaining about Father Shanley (the "Brockton Woman").

RESPONSE NO. 91

Admit.

REQUEST NO. 92

You did not ask Father Shanley what the Brockton Woman was complaining about.

RESPONSE NO. 92

Admit.

REQUEST NO. 93

You made no effort to contact the Brockton Woman.

RESPONSE NO. 93

Admit.

REQUEST NO. 94

You did not investigate whether the Brockton Woman had credible complaints against Father Shanley.

RESPONSE NO. 94

Admit.

REQUEST NO. 95

In May or June of 1983, you knew that Pastor Hugh W. Weston had written Cardinal Medeiros a letter questioning whether Father Shanley attended the founding conference of the North American Man-Boy Love Association ("NAMBLA") (the "Weston Letter").

RESPONSE NO. 95

Admit.

REQUEST NO. 96

A true and accurate copy of the Weston Letter is attached as Exhibit "11" hereto.

RESPONSE NO. 96

Admit.

REQUEST NO. 97

In June of 1983, you knew that NAMBLA was an organization of people supporting sexual relations between men and boys.

RESPONSE NO. 97

Admit.

REQUEST NO. 98

You did not review the RCAB's Files on Father Shanley in response to the Weston Letter.

RESPONSE NO. 98

Admit.

REQUEST NO. 99

You did not speak with Father Shanley in response to the Weston Letter.

RESPONSE NO. 99

Admit.

REQUEST NO. 100

You did nothing to verify whether Father Shanley had attended the founding conference of NAMBLA as referenced in the Weston Letter.

RESPONSE NO. 100

Admit.

REQUEST NO. 101

You did not investigate raised in the Weston Letter.

RESPONSE NO. 101

Admit.

REQUEST NO. 102

You did not speak to the author of The Homosexual Network, which reported that Father Shanley had attended the founding conference of NAMBLA as referenced in the Weston Letter.

RESPONSE NO. 102

Admit.

REQUEST NO. 103

In July of 1983, you knew that Joseph H. Moynihan had written Cardinal Medeiros a letter questioning whether Father Shanley had endorsed sexual relations between men and boys at the founding conference of NAMBLA (the "Moynihan Letter").

RESPONSE NO. 103

Admit.

REQUEST NO. 104

A true and accurate copy of the Moynihan Letter is attached as Exhibit "12" hereto.

RESPONSE NO. 104

Admit.

REQUEST NO. 105

You did not review the RCAB's Files on Father Shanley in response to the Moynihan Letter.

RESPONSE NO. 105

Admit.

REQUEST NO. 106

You did not speak with Father Shanley in response to the Moynihan Letter.

RESPONSE NO. 106

Admit.

REQUEST NO. 107

You did nothing to verify whether Father Shanley had endorsed sexual relations between men and boys at the founding conference of NAMBLA as referenced in the Moynihan Letter.

RESPONSE NO. 107

Admit.

REQUEST NO. 108

You did not investigate the questions raise din the Moynihan Letter.

RESPONSE NO. 108

Admit.

REQUEST NO. 109

In November of 1983, you appointed Father Shanley as Administrator of St. Jean's.

RESPONSE NO. 109

Admit.

REQUEST NO. 110

You assigned Father Shanley as Administrator because, with the death of Cardinal Medeiros, you were the highest ranking cabinet-level priest in terms of authority at the RCAB in November of 1983.

RESPONSE NO. 110

As stated, can neither admit nor deny.

REQUEST NO. 111

Under the circumstances at the time, Father Shanley's appointment as Administrator gave Father Shanley the powers of acting Pastor of St. Jean's.

RESPONSE NO. 111

Admit.

REQUEST NO. 112

Prior to appointing Father Shanley as Administrator of St. Jean's you did not ask Father Shanley about his views on sexual relations between men and boys.

RESPONSE NO. 112

Admit.

REQUEST NO. 113

At the time you appointed Father Shanley as Administrator to St. Jean's you knew that Father Shanley had been associated with endorsing the views of NAMBLA.

RESPONSE NO. 113

Admit.

REQUEST NO. 114

At the time you appointed Father Shanley as Administrator to St. Jean's you knew that someone endorsing sexual relations between men and boys could be a threat to children.

RESPONSE NO. 114

Deny.

REQUEST NO. 115

When you appointed Father Shanley as Administrator of St. Jean's you owed the Plaintiffs a duty of care to protect them from foreseeable risks of harm by Father Shanley at St. Jean's.

RESPONSE NO. 115

Deny.

REQUEST NO. 116

By appointing Father Shanley as Administrator at St. Jean's you breached your duty of care owed to the Plaintiffs.

RESPONSE NO. 116

Deny.

REQUEST NO. 117

You placed no restrictions on Father Shanley's ministry as Administrator at St. Jean's that would have prevented him from having unsupervised access to children.

RESPONSE NO. 117

Admit.

REQUEST NO. 118

You are not aware of any specific restrictions placed on Father Shanley's ministry as Administrator at St. Jean's by anyone at the RCAB that would have prevented him from having unsupervised access to children.

RESPONSE NO. 118

Admit.

REQUEST NO. 119

In 1983, you owed the Plaintiffs a duty of care to protect them from foreseeable risks of harm by Father Shanley at St. Jean's.

RESPONSE NO. 119

Deny.

REQUEST NO. 120

By failing to place any restrictions on Father Shanley's ministry as Administrator of St. Jean's you breached your duty of care owed to the Plaintiffs.

RESPONSE NO. 120

Deny.

REQUEST NO. 121

You were aware in December of 1984 that Cardinal Law appointed Father Shanley as Pastor of St. Jean's.

RESPONSE NO. 121

Admit.

REQUEST NO. 122

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or the substance of the Lerrigo Letter.

RESPONSE NO. 122

Admit.

REQUEST NO. 123

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or the substance of the Flatley Letter.

RESPONSE NO. 123

Admit.

REQUEST NO. 124

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or the substance of the Enterprise Article.

RESPONSE NO. 124

Admit.

REQUEST NO. 125

Prior to leaving the RCAB you did not tell Carding Law about the existence or the substance of the Adams Letter.

RESPONSE NO. 125

Admit.

REQUEST NO. 126

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or the substance of the Reardon Letter or articles attached to that letter.

RESPONSE NO. 126

Admit.

REQUEST NO. 127

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or the substance of the Reilly Letter or the article attached to that letter.

RESPONSE NO. 127

Admit.

REQUEST NO. 128

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the Melia Letter.

RESPONSE NO. 128

Admit.

REQUEST NO. 129

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the Second Flatley Letter.

RESPONSE NO. 129

Admit.

REQUEST NO. 130

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the Sweeney Letter.

RESPONSE NO. 130

Admit.

REQUEST NO. 131

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the Stevens Report.

RESPONSE NO. 131

Admit.

REQUEST NO. 132

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the Eltges Letter.

RESPONSE NO. 132

Admit.

REQUEST NO. 133

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the McGeady Letter or articles attached to that letter.

RESPONSE NO. 133

Admit.

REQUEST NO. 134

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the Weston Letter.

RESPONSE NO. 134

Admit.

REQUEST NO. 135

Prior to leaving the RCAB you did not tell Cardinal Law about the existence or substance of the Moynihan Letter:

RESPONSE NO. 135

Admit.

REQUEST NO. 136

Prior to leaving the RCAB you did not tell Cardinal Law that you believed Father Shanley was a "troubled" priest, i.e., a priest who is disturbed in one sort or another, that needed help.

RESPONSE NO. 136

Admit.

REQUEST NO. 137

Prior to leaving the RCAB you did not tell Cardinal Law that you believed Father Shanley was in need of psychological help.

RESPONSE NO. 137

Admit.

REQUEST NO. 138

Prior to leaving the RCAB you did not tell Cardinal Law that you believed Father Shanley was in need of mental health treatment.

RESPONSE NO. 138

Admit.

REQUEST NO. 139

Prior to leaving the RCAB you did not tell Cardinal Law that you believed Father Shanley was a potential threat to children.

RESPONSE NO. 139

Admit.

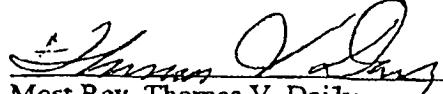
REQUEST NO. 140

You maintained a friendship with Cardinal Law since you left the RCAB in 1984.

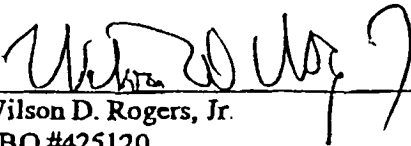
RESPONSE NO. 140

Admit.

Signed under the pains and penalties of perjury this 2ST day of January, 2003.


Most Rev. Thomas V. Daily

As to objections:


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