

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

he had never received the confidential letter of March 23, 1987.

(h) Letter of May 20, 2004 from Cardinal Mahony to Mario Espinosa Contreras, then Bishop of the Diocese, requesting a copy of the confidential letter of March 23, 1987.

(i) Letter of June 11, 2004 from Bishop Espinosa Contreras to Cardinal Mahony enclosing a copy of the confidential letter of March 23, 1987 per the request of May 20, 2004.

INTERROGATORY NO. 22:

Has The Diocese of Tehuacan ever received a written communication(s) from The Roman Catholic Archbishop of Los Angeles, A Corporation Sole?

RESPONSE TO INTERROGATORY NO. 22:

The Diocese incorporates by reference its Preliminary Statement and General Objections set forth above. The Diocese further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon the Diocese. The Diocese further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the extent it requires the Diocese to maintain its regularly-generated reports or documents in a manner different from its usual practice. Subject to and without waiving its objections, the Diocese responds as follows:

The Diocese has received written communications from the Archdiocese of Los Angeles.

INTERROGATORY NO. 23:

If The Diocese of Tehuacan has received a written communication(s) from The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, please identify the date(s) of the communication(s).

RESPONSE TO INTERROGATORY NO. 23:

The Diocese incorporates by reference its Preliminary Statement and General Objections set forth above. The Diocese further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon

CONFIDENTIAL

C-21

1 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
2 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
3 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
4 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
5 manner different from its usual practice. Subject to and without waiving its objections, the
6 Diocese responds as follows:

7 The Diocese has received the following written communications from the Archdiocese of
8 Los Angeles, on the following dates:

9 (a) Letter of January 11, 1988 from Vicar Curry to Cardinal Rivera explaining that Fr.
10 Aguilar had been accused of acting inappropriately towards children and that, as a
11 result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.

12 (b) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los
13 Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera
14 knew of Fr. Aguilar's whereabouts; Cardinal Rivera urge Fr. Aguilar to return to
15 California.

16 (c) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting
17 information as to Fr. Aguilar's relatives.

18 (d) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that
19 he had never received the confidential letter of March 23, 1987 from Cardinal Rivera
20 to Cardinal Mahony.

21 (e) Letter of May 20, 2004 from Cardinal Mahony to Mario Espinosa Contreras, then
22 Bishop of the Diocese, requesting a copy of the confidential letter of March 23, 1987
23 from Cardinal Rivera to Cardinal Mahony.

24 **INTERROGATORY NO. 24:**

25 If The Diocese of Tehuacan ever received a written communication(s) from The Roman
26 Catholic Archbishop of Los Angeles, A Corporation Sole, please identify the subject matter of
27 the communication(s).

28

CONFIDENTIAL

5-22

1 **RESPONSE TO INTERROGATORY NO. 24:**

2 The Diocese incorporates by reference its Preliminary Statement and General Objections
3 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
4 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
5 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
6 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
7 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
8 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
9 manner different from its usual practice. Subject to and without waiving its objections, the
10 Diocese responds as follows:

11 The Diocese has received the following written communications from the Archdiocese of
12 Los Angeles, on the following subjects:

- 13 (a) Letter of January 11, 1988 from Vicar Curry to Cardinal Rivera explaining that Fr.
14 Aguilar had been accused of acting inappropriately towards children and that, as a
15 result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.
- 16 (b) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los
17 Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera
18 knew of Fr. Aguilar's whereabouts, Cardinal Rivera urge Fr. Aguilar to return to
19 California.
- 20 (c) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting
21 information as to Fr. Aguilar's relatives.
- 22 (d) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that
23 he had never received the confidential letter of March 23, 1987 from Cardinal Rivera
24 to Cardinal Mahony.
- 25 (e) Letter of May 20, 2004 from Cardinal Mahony to Mario Espinosa Contreras, then
26 Bishop of the Diocese, requesting a copy of the confidential letter of March 23, 1987
27 from Cardinal Rivera to Cardinal Mahony.
- 28

NO. 1111111111

5-2

1 **INTERROGATORY NO. 25:**

2 Has The Diocese of Tehuacan ever received a written communication(s) from Cardinal
3 Roger Mahony?

4 **RESPONSE TO INTERROGATORY NO. 25:**

5 The Diocese incorporates by reference its Preliminary Statement and General Objections
6 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
7 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
8 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
9 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
10 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
11 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
12 manner different from its usual practice. Subject to and without waiving its objections, the
13 Diocese responds as follows:

14 The Diocese has received written communications from Cardinal Mahony.

15 **INTERROGATORY NO. 26:**

16 If The Diocese of Tehuacan ever received a written communication(s) from Cardinal
17 Roger Mahony, please identify the date(s) of the communication(s).

18 **RESPONSE TO INTERROGATORY NO. 26:**

19 The Diocese incorporates by reference its Preliminary Statement and General Objections
20 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
21 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
22 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
23 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
24 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
25 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
26 manner different from its usual practice. Subject to and without waiving its objections, the
27 Diocese responds as follows:

28 The Diocese has received the following written communications from Cardinal Mahony,

10-11-10

5-20

1 on the following dates:

2 (a) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting
3 information as to Fr. Aguilar's relatives.

4 (b) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that
5 he had never received the confidential letter of March 23, 1987 from Cardinal Rivera
6 to Cardinal Mahony.

7 (c) Letter of May 20, 2004 from Cardinal Mahony to Mario Espinosa Contreras, then
8 Bishop of the Diocese, requesting a copy of the confidential letter of March 23, 1987
9 from Cardinal Rivera to Cardinal Mahony.

10 **INTERROGATORY NO. 27:**

11 If The Diocese of Tehuacan ever received a written communication(s) from Cardinal
12 Roger Mahony, please identify the subject matter of the communication(s).

13 **RESPONSE TO INTERROGATORY NO. 27:**

14 The Diocese incorporates by reference its Preliminary Statement and General Objections
15 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
16 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
17 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
18 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
19 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
20 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
21 manner different from its usual practice. Subject to and without waiving its objections, the
22 Diocese responds as follows:

23 The Diocese has received the following written communications from Cardinal Mahony,
24 on the following subjects:

25 (a) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting
26 information as to Fr. Aguilar's relatives.

27 (b) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that
28 he had never received the confidential letter of March 23, 1987 from Cardinal Rivera

10-11-13

5-20

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

to Cardinal Mahony.

(c) Letter of May 20, 2004 from Cardinal Mahony to Mario Espinosa Contreras, then Bishop of the Diocese, requesting a copy of the confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony.

INTERROGATORY NO. 28:

Has an officer, director, or managing agent of The Diocese of Tehuacan ever had verbal communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar?

RESPONSE TO INTERROGATORY NO. 28:

The Diocese incorporates by reference its Preliminary Statement and General Objections set forth above. The Diocese further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon the Diocese. The Diocese further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the extent it requires the Diocese to maintain its regularly-generated reports or documents in a manner different from its usual practice. Subject to and without waiving its objections, the Diocese responds as follows:

No current employee of the Diocese has personal knowledge of any supposed association between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los Angeles County on September 19, 2006. On information and belief, no officer, director or managing agent of the Diocese ever had verbal communications with an officer, director or managing agent of the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

INTERROGATORY NO. 29:

If an officer, director, or managing agent of The Diocese of Tehuacan has had a verbal communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please identify the date(s) of the communication(s).

04/11/06

5-24

1 **RESPONSE TO INTERROGATORY NO. 29:**

2 The Diocese incorporates by reference its Preliminary Statement and General Objections
3 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
4 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
5 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
6 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
7 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
8 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
9 manner different from its usual practice. Subject to and without waiving its objections, the
10 Diocese responds as follows:

11 No current employee of the Diocese has personal knowledge of any supposed association
12 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese
13 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los
14 Angeles County on September 19, 2006. On information and belief, no officer, director or
15 managing agent of the Diocese ever had verbal communications with an officer, director or
16 managing agent of the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

17 **INTERROGATORY NO. 30:**

18 If an officer, director, or managing agent of The Diocese of Tehuacan has had a verbal
19 communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole,
20 regarding Nicholas Aguilar, please identify the name of the individual(s) with whom an officer,
21 director, or managing agent of The Diocese of Tehuacan has had verbal communication(s).

22 **RESPONSE TO INTERROGATORY NO. 30:**

23 The Diocese incorporates by reference its Preliminary Statement and General Objections
24 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
25 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
26 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
27 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
28 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the

40-1111-0

527

1 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
2 manner different from its usual practice. Subject to and without waiving its objections, the
3 Diocese responds as follows:

4 No current employee of the Diocese has personal knowledge of any supposed association
5 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese
6 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los
7 Angeles County on September 19, 2006. On information and belief, no officer, director or
8 managing agent of the Diocese ever had verbal communications with an officer, director or
9 managing agent of the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

10 **INTERROGATORY NO. 31:**

11 If an officer, director, or managing agent of The Diocese of Tehuacan ever had a verbal
12 communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole,
13 regarding Nicholas Aguilar, please identify the subject matter of the communication(s).

14 **RESPONSE TO INTERROGATORY NO. 31:**

15 The Diocese incorporates by reference its Preliminary Statement and General Objections
16 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
17 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
18 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
19 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
20 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
21 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
22 manner different from its usual practice. Subject to and without waiving its objections, the
23 Diocese responds as follows:

24 No current employee of the Diocese has personal knowledge of any supposed association
25 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese
26 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los
27 Angeles County on September 19, 2006. On information and belief, no officer, director or
28 managing agent of the Diocese ever had verbal communications with an officer, director or

10/27/10

528

1 managing agent of the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

2 **INTERROGATORY NO. 32:**

3 If an officer, director, or managing agent of The Diocese of Tehuacan ever had a verbal
4 communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole,
5 regarding Nicholas Aguilar, please state whether notes are in existence which document the
6 subject matter of the communication(s).

7 **RESPONSE TO INTERROGATORY NO. 32:**

8 The Diocese incorporates by reference its Preliminary Statement and General Objections
9 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
10 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
11 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
12 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
13 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
14 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
15 manner different from its usual practice. Subject to and without waiving its objections, the
16 Diocese responds as follows:

17 No current employee of the Diocese has personal knowledge of any supposed association
18 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese
19 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los
20 Angeles County on September 19, 2006. On information and belief, no officer, director or
21 managing agent of the Diocese ever had verbal communications with an officer, director or
22 managing agent of the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

23 **INTERROGATORY NO. 33:**

24 Has an officer, director, or managing agent of The Diocese of Tehuacan ever had verbal
25 communication(s) with Cardinal Roger Mahony, regarding Nicholas Aguilar?

26 **RESPONSE TO INTERROGATORY NO. 33:**

27 The Diocese incorporates by reference its Preliminary Statement and General Objections
28 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,

NO. 11111111

420

1 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
2 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
3 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
4 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
5 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
6 manner different from its usual practice. Subject to and without waiving its objections, the
7 Diocese responds as follows:

8 No current employee of the Diocese has personal knowledge of any supposed association
9 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese
10 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los
11 Angeles County on September 19, 2006. On information and belief, no officer, director or
12 managing agent of the Diocese ever had verbal communications with Cardinal Mahony
13 regarding Fr. Aguilar.

14 **INTERROGATORY NO. 34:**

15 If an officer, director, or managing agent of The Diocese of Tehuacan has had a verbal
16 communication(s) with Cardinal Roger Mahony, regarding Nicholas Aguilar, please identify the
17 date(s) of the communication(s).

18 **RESPONSE TO INTERROGATORY NO. 34:**

19 The Diocese incorporates by reference its Preliminary Statement and General Objections
20 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
21 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
22 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
23 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
24 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
25 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
26 manner different from its usual practice. Subject to and without waiving its objections, the
27 Diocese responds as follows:

28 No current employee of the Diocese has personal knowledge of any supposed association

5-35

5-35

1 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese
2 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los
3 Angeles County on September 19, 2006. On information and belief, no officer, director or
4 managing agent of the Diocese ever had verbal communications with Cardinal Mahony
5 regarding Fr. Aguilar.

6 **INTERROGATORY NO. 35:**

7 If an officer, director, or managing agent of The Diocese of Tehuacan has had a verbal
8 communication(s) with Cardinal Roger Mahony, regarding Nicholas Aguilar, please identify the
9 subject matter of the communication(s).

10 **RESPONSE TO INTERROGATORY NO. 35:**

11 The Diocese incorporates by reference its Preliminary Statement and General Objections
12 set forth above. The Diocese further objects to this Interrogatory because it is overly broad,
13 unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon
14 the Diocese. The Diocese further objects to this Interrogatory because it seeks information that
15 is neither relevant to the subject matter involved in this action nor reasonably calculated to lead
16 to the discovery of admissible evidence. The Diocese further objects to this Interrogatory to the
17 extent it requires the Diocese to maintain its regularly-generated reports or documents in a
18 manner different from its usual practice. Subject to and without waiving its objections, the
19 Diocese responds as follows:

20 No current employee of the Diocese has personal knowledge of any supposed association
21 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese
22 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los
23 Angeles County on September 19, 2006. On information and belief, no officer, director or
24 managing agent of the Diocese ever had verbal communications with Cardinal Mahony
25 regarding Fr. Aguilar.

26 **INTERROGATORY NO. 36:**

27 If an officer, director, or managing agent of The Diocese of Tehuacan has had a verbal
28 communication(s) with Cardinal Roger Mahony, regarding Nicholas Aguilar, please state

NON-PROFIT

531

1 whether there are any writings which document the subject matter of the communication(s).

2 **RESPONSE TO INTERROGATORY NO. 36:**

3 The Diocese incorporates by reference its Preliminary Statement and General Objections
4 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
5 the maximum number of special interrogatories authorized by Section 2030.030 of the California
6 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

7 **INTERROGATORY NO. 37:**

8 Has an officer, director, or managing agent of The Diocese of Tehuacan every had any
9 conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
10 was discussed.

11 **RESPONSE TO INTERROGATORY NO. 37:**

12 The Diocese incorporates by reference its Preliminary Statement and General Objections
13 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
14 the maximum number of special interrogatories authorized by Section 2030.030 of the California
15 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

16 **INTERROGATORY NO. 38:**

17 If an officer, director, or managing agent of The Diocese of Tehuacan has had a
18 conversation with Nicholas Aguilar in which the subject of Aguilar's transfer to California was
19 discussed, please identify each officer, director, or managing agent of The Diocese of Tehuacan
20 who had this conversation(s).

21 **RESPONSE TO INTERROGATORY NO. 38:**

22 The Diocese incorporates by reference its Preliminary Statement and General Objections
23 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
24 the maximum number of special interrogatories authorized by Section 2030.030 of the California
25 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

26 **INTERROGATORY NO. 39:**

27 If an officer, director, or managing agent of The Diocese of Tehuacan has had a
28 conversation with Nicholas Aguilar in which the subject of Aguilar's transfer to California was

NO. 39

232

1 discussed, please describe the date of the conversation(s).

2 **RESPONSE TO INTERROGATORY NO. 39:**

3 The Diocese incorporates by reference its Preliminary Statement and General Objections
4 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
5 the maximum number of special interrogatories authorized by Section 2030.030 of the California
6 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

7 **INTERROGATORY NO. 40:**

8 If an officer, director, or managing agent of The Diocese of Tehuacan has had a
9 conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
10 was discussed, please describe the substance of the conversation.

11 **RESPONSE TO INTERROGATORY NO. 40:**

12 The Diocese incorporates by reference its Preliminary Statement and General Objections
13 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
14 the maximum number of special interrogatories authorized by Section 2030.030 of the California
15 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

16 **INTERROGATORY NO. 41:**

17 If an officer, director, or managing agent of The Diocese of Tehuacan has had a
18 conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
19 was discussed, please state whether there are any writings which document the subject matter of
20 the conversation(s).

21 **RESPONSE TO INTERROGATORY NO. 41:**

22 The Diocese incorporates by reference its Preliminary Statement and General Objections
23 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
24 the maximum number of special interrogatories authorized by Section 2030.030 of the California
25 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

26 **INTERROGATORY NO. 42:**

27 Has an officer, director, or managing agent of The Diocese of Tehuacan had any written
28 communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California

NO. 39

5 22

1 was discussed.

2 **RESPONSE TO INTERROGATORY NO. 42:**

3 The Diocese incorporates by reference its Preliminary Statement and General Objections
4 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
5 the maximum number of special interrogatories authorized by Section 2030.030 of the California
6 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

7 **INTERROGATORY NO. 43:**

8 If an officer, director, or managing agent of The Diocese of Tehuacan has had written
9 communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
10 was discussed, please identify each officer, director, and/or managing agent.

11 **RESPONSE TO INTERROGATORY NO. 43:**

12 The Diocese incorporates by reference its Preliminary Statement and General Objections
13 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
14 the maximum number of special interrogatories authorized by Section 2030.030 of the California
15 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

16 **INTERROGATORY NO. 44:**

17 If an officer, director, or managing agent of The Diocese of Tehuacan has had written
18 communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
19 was discussed, please describe the date of the communication(s).

20 **RESPONSE TO INTERROGATORY NO. 44:**

21 The Diocese incorporates by reference its Preliminary Statement and General Objections
22 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
23 the maximum number of special interrogatories authorized by Section 2030.030 of the California
24 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

25 **INTERROGATORY NO. 45:**

26 If an officer, director, or managing agent of The Diocese of Tehuacan has had written
27 communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California
28 was discussed, please describe the substance of the communication(s).

NO ANSWER

5-20

1 **RESPONSE TO INTERROGATORY NO. 45:**

2 The Diocese incorporates by reference its Preliminary Statement and General Objections
3 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
4 the maximum number of special interrogatories authorized by Section 2030.030 of the California
5 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

6 **INTERROGATORY NO. 46:**

7 Does The Diocese of Tehuacan own any property in California, United States of
8 America?

9 **RESPONSE TO INTERROGATORY NO. 46:**

10 The Diocese incorporates by reference its Preliminary Statement and General Objections
11 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
12 the maximum number of special interrogatories authorized by Section 2030.030 of the California
13 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

14 **INTERROGATORY NO. 47:**

15 If The Diocese of Tehuacan does own property in California, United States of America,
16 please identify the property.

17 **RESPONSE TO INTERROGATORY NO. 47:**

18 The Diocese incorporates by reference its Preliminary Statement and General Objections
19 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
20 the maximum number of special interrogatories authorized by Section 2030.030 of the California
21 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

22 **INTERROGATORY NO. 48:**

23 If The Diocese of Tehuacan does own property in California, United States of America,
24 please state the date the property was acquired.

25 **RESPONSE TO INTERROGATORY NO. 48:**

26 The Diocese incorporates by reference its Preliminary Statement and General Objections
27 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
28 the maximum number of special interrogatories authorized by Section 2030.030 of the California

40-111-0

135

1 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

2 **INTERROGATORY NO. 49:**

3 If The Diocese of Tehuacan does own property in California, United States of America,
4 please describe the nature of use of the property.

5 **RESPONSE TO INTERROGATORY NO. 49:**

6 The Diocese incorporates by reference its Preliminary Statement and General Objections
7 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
8 the maximum number of special interrogatories authorized by Section 2030.030 of the California
9 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

10 **INTERROGATORY NO. 50:**

11 Please identify each and every communication in whatever form that any cleric, priest,
12 brother, or lay employees of The Diocese of Tehuacan has had with any person incardinated with
13 The Roman Catholic Archbishop of Los Angeles, A Corporation Sole.

14 **RESPONSE TO INTERROGATORY NO. 50:**

15 The Diocese incorporates by reference its Preliminary Statement and General Objections
16 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
17 the maximum number of special interrogatories authorized by Section 2030.030 of the California
18 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

19 **INTERROGATORY NO. 51:**

20 Has any person incardinated in The Diocese of Tehuacan been accused of sexually
21 abusing minors while that incardinated person was in California, United States of America?

22 **RESPONSE TO INTERROGATORY NO. 51:**

23 The Diocese incorporates by reference its Preliminary Statement and General Objections
24 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
25 the maximum number of special interrogatories authorized by Section 2030.030 of the California
26 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

27 **INTERROGATORY NO. 52:**

28 If a person incardinated in The Diocese of Tehuacan has been accused of sexually

NO. 11111111

5-36

1 abusing a minor in California, please describe how The Diocese of Tehuacan became aware of
2 the abuse.

3 **RESPONSE TO INTERROGATORY NO. 52:**

4 The Diocese incorporates by reference its Preliminary Statement and General Objections
5 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
6 the maximum number of special interrogatories authorized by Section 2030.030 of the California
7 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

8 **INTERROGATORY NO. 53:**

9 If a person incardinated in The Diocese of Tehuacan has been accused of sexually
10 abusing a minor in California, please state the date The Diocese of Tehuacan became aware of
11 the abuse.

12 **RESPONSE TO INTERROGATORY NO. 53:**

13 The Diocese incorporates by reference its Preliminary Statement and General Objections
14 set forth above. The Diocese further objects to this Interrogatory because Plaintiff has exceeded
15 the maximum number of special interrogatories authorized by Section 2030.030 of the California
16 Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

17
18 Dated: May 18, 2007

MAYER, BROWN, ROWE & MAW LLP
MICHAEL L. CYPERS
STEVEN R. SELSBERG
EVAN M. WOOTEN

19
20
21
22 By: 

Evan M. Wooten

23 Attorneys for Defendants Appearing Specially
24 CARDINAL NORBERTO RIVERA AND THE
25 DIOCESE OF TEHUACAN
26
27
28

NO. 111111

237

DE : Fernández del Castillo y Asoc. NO. DE TEL : 5533 6700
FROM : Obispado de Toluca FAX NO. : 012383831468

08 MAY. 2007 12:48PM P4
May. 07 2007 02:43:11

VERIFICATION

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: May 7th 2007

By: + Rodrigo Aguilar
Bishop Rodrigo Aguilar Martínez

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

NO. 111111

538

1 **PROOF OF SERVICE**

2 I, Haewon Park, declare:

3 I am employed in Los Angeles County, California. I am over the age of eighteen years
4 and not a party to the within-entitled action. My business address is 350 South Grand Avenue,
5 25th Floor, Los Angeles, California 90071-1503. On May 18, 2007, I served a copy of the
6 within document(s):

7 **DEFENDANT THE DIOCESE OF TEHUACAN'S RESPONSES TO**
8 **PLAINTIFF'S INTERROGATORIES REGARDING JURISDICTION**

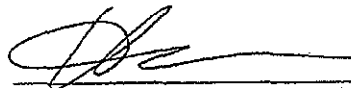
- 9 by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- 10 by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.
- 11
- 12 by placing the document(s) listed above in a sealed UPS envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a UPS agent for delivery.
- 13
- 14 by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- 15

16 *Please see attached service list.*

17 I am readily familiar with the firm's practice of collection and processing correspondence
18 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same
19 day with postage thereon fully prepaid in the ordinary course of business. I am aware that on
20 motion of the party served, service is presumed invalid if postal cancellation date or postage
21 meter date is more than one day after date of deposit for mailing in affidavit.

22 I declare under penalty of perjury under the laws of the State of California that the above
23 is true and correct.

24 Executed on May 18, 2007, at Los Angeles, California.

25 

26 Haewon Park

27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

239

SERVICE LIST

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Lawrence E. Drivon, Esq.
David E. Drivon, Esq.
Robert T. Waters, Esq.
The Drivon Law Firm
215 N. San Joaquin Street
Stockton, CA 95202
Phone: (209) 644-1234
Fax: (209) 463-7668

Michael G. Finnegan, Esq.
Jeff Anderson & Associates
E-1000 First National Bank Bldg.
332 Minnesota Street
St. Paul, Minnesota 55101
Phone: (651) 227-9990
Fax: (651) 297-6543

Martin D. Gross, Esq.
Law Offices of Martin D. Gross
2001 Wilshire Blvd., Suite 205
Santa Monica, CA 90403
Phone: (310) 453-8320
Fax: (310) 861-1359

J. Michael Hennigan, Esq.
Lee W. Potts, Esq.
Hennigan, Bennett & Dorman, LLP
865 South Figueroa St. Ste. 2900
Los Angeles, CA 90017-5708
Phone: (213) 694-1200
Fax: (213) 694-1234

JOHN

4-90