

MACRAE

III

9669

6423-8013
OF MANCHESTER

V. DIORSE

New Client

Former Client

Present Client

CLIENT NAME: Diocese of Manchester Date: _____

Contact Name: Monsignor Francis Business Phone: 662-5100 Home Phone: _____

Current Business Name: _____

Primary Type of Business: _____ 9670

Name(s) of Client's subsidiaries and affiliates: _____

Personal Affiliations: _____

Principals Involved (Directors, Key Employees): _____

(Attach separate sheet if additional space required.)

Client Billing Address: Raymond Peman, Gallagher-Bassett Esq. Bedford, NH 03110

Originating Attorney: RED Billing Attorney: BEC Responsible Attorney: JETH

Federal Identification Number or Social Security Number: _____

Case Information

Case #: 8013 Case Name: [Redacted] Macrae, V Gordon

INSURANCE COMPANIES INVOLVED: The Roman Catholic Bishop of Manchester

For Plaintiff: _____ For Defendant: _____

CASE NAME (Line 2 of Insurance Company cases): _____ Policy #: _____ Claim #: _____

Claimant: _____ Insured and/or defendant: _____

NATURE OF MATTER (Brief Description): negligent supervision, respondeat superior

Suing Party: _____ Amount Involved: 433-1830

Opposing Lawyer and Address: Peter A. Gleichman, Esq. P.O. Box 598, Portsmouth, NH 03805

Billing Cycle Code: quarterly Field of Law: 335 Billing Template Code: 10

Case Billing Name & Address (Enter only if mailing address is different than client billing address used above): _____

(Street) _____ (City) _____ (State) _____ (ZIP Code) _____

Appropriate litigation timetable checklist completed and attached to file JL

Practice Group to perform work: PIG (Paralegal) _____

Fee Arrangement

Fee to be determined based on time/effort and/or results. Projected Completion Date: _____ Estimated Fee: _____

Client has has not agreed. If not, why not? _____

Contingency of: % _____ Opening Retainer of \$ _____

Agreement signed by client? YES NO (If not, why not? _____)

Fixed Fee of \$ _____ or range of \$ _____ to \$ _____

Time Rate: \$ reg. rates

Other: _____

Firm Administration

Documents (if necessary) prepared by: [Signature]

ENTERED OCT 07 1993

Books or contact of interest by: [Signature]

(Secretary)

(Accounting)

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

9671



ATTORNEYS AT LAW

April 17, 1997

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Re: [REDACTED] v. MacRae and Diocese of
Manchester


Dear Peter:

143 NORTH MAIN STREET
SUITE #103
CONCORD
NEW HAMPSHIRE
03301-5089
FAX 603-224-8899
603-223-2020

I have your letter of April 16th. As indicated in our telephone conversation today, I forwarded this letter to the Diocese. I know you realize that the Diocese has absolutely no legal obligation toward your client. The rights and obligations of the parties were decided conclusively last summer.

We will respond to your request in due course.

Very truly yours,


James E. Higgins

JEH/slb

CATHOLIC SOCIAL SERVICES

An Agency of N. H. Catholic Charities

9672

Rev. John P. Quinn
Director
New Hampshire Catholic Charities

Richard T. Kelly, ACSW
Director
Catholic Social Services

Salem Regional Office
215 MAIN ST., SALEM, N. H. 03079
TEL. (603) 893-1971

Janet O'Connell, ACSW
Supervisor

June 1, 1984

Rev. John P. Quinn-Director
N.H. Catholic Charities
215 Myrtle Street
Manchester, N.H. 03015

Dear Father Quinn:

This letter is to follow up on our previous conversation regarding [REDACTED]. I am writing to ask for your help in exploring possible resources that might assist this youngster in attending St. Thomas Aquinas in the fall. The family finances are highly straitened due to the layoff at the Seabrook plant, and [REDACTED] has currently been enrolled at Winnacunnet High School.

He is a graduating 8th grader at Sacred Heart School in Hampton whom I have been seeing for therapy since September 1983. Although he has made gains in treatment, this youngster, in my opinion, remains pretty fragile. I fear that he would be simply overwhelmed in a large public high school. His self concept is extremely poor, a situation which is unfortunately reinforced by others who see him as "different".

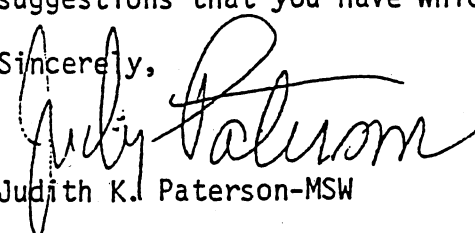
[REDACTED] is a devout Catholic and, within the safety of a parochial climate as well as with youngsters who are a little more accepting than is the norm in a public system, he has managed to come out of his shell and establish good relationships with others. I question whether this would be possible at Winnacunnet High School.

I might comment that I am familiar with the Winnacunnet system as I have worked with a number of youngsters in that school as well as with the Guidance Department. Suffice it to say that there are a large number of troubled and "street smart" kids in the school. In public junior high school in Hampton, [REDACTED] was often teased and rejected by schoolmates and consequently became a loner. I see the possibility of that situation being reenacted at senior high school and question whether [REDACTED] could handle that stress a second time. Moreover, I have not found this school particularly sensitive to adolescents with out of the ordinary special needs. Youngsters tend more to be grouped by types. In this kind of a situation, a youngster like [REDACTED] simply goes unnoticed until a crisis occurs.

I might add that this is a youngster with a great deal of ability, who is bright, creative and charming and who has the makings of a fine artist. He is gifted with a talent for drawing that is quite extraordinary.

I am most appreciative of your interest in this youngster and thank you for any suggestions that you have which might be helpful to him.

Sincerely,



Judith K. Paterson-MSW

JKP:jab

11/23/83

Rev. Gordon MacRae
 St. Bernards Church
 173 Main Street
 Keene, N.H.

On this date, I met with Rev. John Quinn, Director of Catholic Charities. At this time Rev. Quinn reported an incident of suspected child abuse involving Rev. Gordon MacRae. During this meeting Rev. Quinn described the circumstances related to the alleged incident of child abuse:

(1) Perpetrator: Rev. Gordon MacRae
 St. Bernards Church
 173 Main Street
 Keene, N.H.

(2) Victim: Fifteen year old male child

name of child and family unknown, but information can be acquired. The child comes from the Hampton area.

(3) Incident/Act: Rev. MacRae allegedly had the fifteen year old male child sitting on his lap and was kissing the boy. The alleged incident was discovered by the child's counselor. The child had been referred for counseling for matters other than the alleged incident of child abuse.

(4) Founded/Unfounded: Rev. MacRae has admitted the incident to his superiors.

(5) Treatment:

perpetrator: Rev. MacRae is currently in therapy with Dr. Henry Guertin-Ouellette. Apparently therapy is positive at this time.

victim: The child is currently in counseling at Catholic Charities in the Exeter office. The original presenting problem requiring treatment was not related to the alleged incident with Rev. MacRae.

The child's situation was complicated three weeks ago when he attempted suicide. The child attempted to slash his wrist. He is currently being evaluated for treatment and admittance to Hampstead Hospital.

The child's family is also involved in therapy related to a number of difficult issues. The child's family is aware of the incident between their son and Rev. MacRae.

PLEASE NOTE

For therapeutic purposes the child's therapist feels that he is vulnerable and requests that no information be shared with or discussed with the child regarding the referral of Rev. MacRae to the Division of Welfare.

- (6) Perpetrator's History: In the course of the child's therapy he advised his therapist that Rev. MacRae had also been involved with another male child in a similar situation. There is no knowledge of this other child.

Rev. MacRae has a history of involvement with other children, not necessarily deviant behavior. Previously he had supervision of [REDACTED] who was in the custody of the Division of Welfare. The child moved from Lancaster to Hampton with Rev. MacRae. Subsequent placements of the child failed and Rev. MacRae requested that the child live in the Hampton Rectory. The child is apparently not in supervision of Father MacRae at this time, but this must be verified.

- (7) Resources: Lois Webb at Catholic Charities office in Exeter is a potential resource on this situation.

(8) Recommendations:

- (a) Jeannette Gagnon further discuss situation with Rev. Quinn.
- (b) Referral to Attorney General's office
- (c) Follow-up on therapeutic care of child and family with Lois Webb.
- (d) Review the [REDACTED] situation.

Richard A. Chevrefils
Director
11/29/83


05/12/86

I telephoned Reverend John Quinn this date. He remembers the [redacted] Macrae incident, and expressed surprise that the family had no knowledge of how the matter was handled, and that they now wanted to meet with him. He recalls offering to meet with them at the time, through Judy Patterson but they declined. He would be most willing to confer now with them. Please refer to correspondence to family, dated 05/12/86.

Father Quinn has no written report on the results of therapy/treatment provided by their psychologist, Dr. Henny Quertin-Ouellette. However, he recalls monitoring the case and receiving a verbal report that there had been satisfactory treatment. According to Father Quinn, no further reports against this priest were ever received and in fact, the Father has done "remarkable work", not with youth, but in the field of drug/alcohol abuse. Father Macrae is still in the Keene parish. (Father Quinn can be reached at 1-800-562-5249 or private line is 668-1662.)

I telephoned Det Wardle this date and informed him of the home visit and plan. Det Wardle indicated that [redacted] told him that the Father told "dirty stories, racial jokes, and jokes about the Pope", which was apparently not told to Betty Davis or Judy Patterson. However, Det Wardle asked specifically about any additional sexual misuse, and [redacted] answered "no". He denied any masturbation, oral sex, etc. Det Wardle commended on [redacted]'s emotional needs, and the attention he is receiving from these discussions. He concurred that [redacted] should be referred through Dr. Brown, and he can assist in our understanding of [redacted] current emotional make-up.

(Det Wardle believes that [redacted] was discharged from St. Thomas Aquinos for carrying a knife.)


MEF/Jag

05/12/86

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MEF
MEF/Jag

Interviews - Ken Polio

Keene Police Department

Case [REDACTED]

[REDACTED]
[REDACTED] e
[REDACTED]
[REDACTED]

BC I am Brian Clark. I'm with the Keene Police Department. It's the first of June 1994, approximately 7:00 P.M. I'm at the [REDACTED] residence at [REDACTED] in [REDACTED] New Hampshire. We're doing an interview with [REDACTED] and [REDACTED] and for the tape ah, you both know this is being recorded?

[REDACTED] Yes

[REDACTED] Yes

BC Do you, do we have your permission to record this?

[REDACTED] Yes you do

[REDACTED] Yes

BC Could you, [REDACTED] please state your name and your date of birth

[REDACTED]

[REDACTED]

BC O.K., could you generally, either one, tell me about yourselves; how long you've been married, children, where you have lived.

[REDACTED] Well, we've been married since, what, 1960....

[REDACTED] We've been married twice

[REDACTED] Yeah, 1960. I have three children; 9 grandchildren. I'm retired from the [REDACTED] in 1977, and I've been working down the east coast for the past ah, ten - fifteen years, since I've been retired. I'm a [REDACTED] for [REDACTED] and [REDACTED] at this time and I've been with them for three years.

BC [REDACTED]

[REDACTED] Oh, I've just been a housewife and working down at the beach, [REDACTED] for the past three years as a housekeeper.

D-203

BC Where have you lived since you were married?

[REDACTED] All over; I was in the service. We started out in [REDACTED]

BC How about New Hampshire?

[REDACTED] New Hampshire, we moved to New Hampshire in December of [REDACTED] in Seabrook; spent about a year, year in a half there. Then we moved to Hampton and rented an old run down farm in 19...oh 80 to 83. In December of '83, we bought this house, here, at [REDACTED], and we've been living here ever since.

BC Where was the house in ah, Hampton, that was from 80 - 83.

[REDACTED] Ah [REDACTED]

BC [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

BC Did I pass that?

[REDACTED] Ah yeah, if you come through the, ah, if you

BC Yeah

[REDACTED] If you came down [REDACTED] t you would have passed part of it.

BC Yeah, yeah

[REDACTED] It ends right at [REDACTED] t

BC ...unclear....seeing, looking for every road on the way. And, what is your religious

[REDACTED] Catholic

BC Catholic. O.K. What church do you worship, worship at?

[REDACTED] We don't.

BC Back in the early 80's, what church did you worship at?

[REDACTED] The Immaculate Conception down in Hampton.

BC And, is there a rectory that belongs with that church also?

[REDACTED] Yes there is

BC Is there a name to the rectory, or the same?

[REDACTED] Same thing

[REDACTED] I think it was the same name.

BC O.K. Where you lived in '80-83, what was the relationship to where your house was, and to where the rectory/church was? How - distance wise?

[REDACTED] Well, about maybe three miles at the most.

BC Within walking or biking distance?

[REDACTED] Yeah

[REDACTED] Oh sure

BC And, does that rectory have a school?

[REDACTED] Yes

[REDACTED] Yes

[REDACTED] An elementary school, as part of the, ah, church there

BC And do you know what the name of the school is?

[REDACTED] Same thing, right?

[REDACTED] Sacred Heart

[REDACTED] Yeah, Sacred Heart Elementary....

BC Do you know what grade that goes up to?

[REDACTED] Ah eighth grade I think.

BC Did any of your children go to that school? Sacred Heart?

[REDACTED] No, [REDACTED] was the only one

BC [REDACTED] did that. O.K., and when did he attend that school?

[REDACTED] Ah I think he went in there in 1983, right? '83 - '84, the last, '84 -...unclear...

BC Are you sure on the dates, or is that

[REDACTED] It's so hard to remember the dates, now,

BC I know the incident was brought out in '83; that's when we found out about the molestation, and he was in the Sacred Heart School at that time.

[REDACTED] He got trans.... Father MacRae was transferred out of Hampton when [REDACTED] started Sacred Heart School

[REDACTED] Yeah. [REDACTED] first met him though, a year, a year or so prior to that, through CCD classes, cause he was going to, ah, what's the name of that - Hampton, Hampton....

[REDACTED] Hampton Academy

[REDACTED] He attended Hampton Academy I guess, sixth and seventh grades.

BC What is CCD?

[REDACTED] Catholic

[REDACTED] Catholic catechism teaching

BC And where were those, where did that take place?

[REDACTED] At the ab Sacred Heart School as far as I know, after school....

BC After school

[REDACTED] After his public school he would go to that, that school there or Sunday mornings after church, I guess

[REDACTED] It was after mass

[REDACTED] Yeah, Sunday mornings was the CCD class

[REDACTED] Uh-huh, they would go to Sunday school. It's a Sunday school.

[REDACTED] Yeah, what they call a Sunday school.

BC And, who taught that CCD?

[REDACTED] I don't know who his teacher's were

BC Were they priests or sisters, nuns, or from the church?

[REDACTED] I think

[REDACTED] They were nuns

BC How did he meet Gordon MacRae?

[REDACTED] He was affiliated with the, with the school at that time, as a, ya know as a preacher in the church and he was also part of the, ah, school activities and participated. So I'm sure every Sunday morning he popped in there, to see what's going on.

BC O.K., did you ever see him at the church, Gordon MacRae?

[REDACTED] Oh yeah

[REDACTED] I mean, we went to mass

[REDACTED] He used to, ya know, do the masses and so forth

BC Was he the pastor?

[REDACTED] He was second in command, I guess. Well, I guess there was only two there anyway and I can't remember the name of the other priest that was there.

[REDACTED] ...unclear....

BC Well that was my next question, if you recall who it was, but

[REDACTED] knows who it is, it's a French name

[REDACTED] Right...Boucher

[REDACTED] Boucher, yeah I think that was it.

BC I'll skip back and forth a little here.....so you started school in approximately '83 at that

[REDACTED] At that Sacred Heart School

BC Sacred Heart. How did he come about going to Sacred Heart?

[REDACTED] I think

[REDACTED] Father Gordon

[REDACTED] Father Gordon brought him

[REDACTED] Encouraged him

[REDACTED] Encouraged him

[REDACTED] Encouraged him to go there

[REDACTED] To go over there. He talked us in to sending him over there, which we did.

BC Who paid for that?

[REDACTED] I did. I did.

BC Do you remember what the tuition was?

[REDACTED] I think it was \$500.00 (five hundred dollars), wasn't it?

[REDACTED] Ahuh

BC A year?

[REDACTED] A year.

[REDACTED] See, [REDACTED] was having difficulty when he was in Hampton Junior High School. He started having a little bit of, ah, lack of self esteem and his grades would, were very poor, getting very poor. They were very good when he first entered, but it seemed like they started declining there after a while.....member, after he met Father Gordon they really started going down, and we had sent him off to a summer camp, to build his self-esteem up because we knew he was going to be repeating the 7th grade, and ah, through that period is when he knew Father Gordon, ya know, they were becoming more buddies, and that's when Father Gordon says "well, don't worry about the school" and this, that and the other thing, he says "I'll get you into Sacred Heart School", ya know, register for Sacred Heart. And he made a joke out of it, yeah, he says, I'll get you into Sacred Heart, he says "after I get you in there" he says "I take off", ya know.

BC How ah, how did he go about getting him in there?

[REDACTED] Well, he said he did, but actually we registered him

[REDACTED] Yeah, we went down, yeah, we went down and filled in the application ourselves..

[REDACTED] and started paying it, so, we went

[REDACTED] Yeah

BC Can you tell me about some of the troubles he was having?

[REDACTED] In school?

BC In school, before he went to Sacred Heart.

[REDACTED] (sigh) He didn't, I didn't have any problems with him as far as his conduct goes or anything in school. I was - to my knowledge I was never called in school for any ah, behavior problems. I was just - his grades were just dropping, you know.

[REDACTED] He lost - he lost a great deal of interest in school and

[REDACTED] He lost, yeah

BC What was he doing besides school at this point, you said he was, you started to see Father MacRae, excuse me, Gordon MacRae?

[REDACTED] Well, Gordon MacRae was picking him up after school, and we didn't know that.

BC How do you know he did?

[REDACTED] [REDACTED] told us. And one evening I came home from work - there was one hour a day after school, [REDACTED] would be alone, and, cause I didn't get out of work until, what,

[REDACTED] Three thirty

[REDACTED] Three thirty, and I think he got out of school maybe two or two thirty, and it was when we first bought this house, I came in from work - Father MacRae was sitting on my couch. [REDACTED] had picked him up, he had picked [REDACTED] up from school and he had been transferred then and he said "Well, I'm gonna take him out for a cup of coffee". He must of rode around the block and dropped the kid right off and got scared and took off, I don't know what happened.

BC Yeah, I'm a little confused on time. This was after you moved to this house

█ Yes, the fall of '83, right prior to him getting counseling

BC Yup, and he was, do you remember the month?

█ Gee, it was warm weather, so it had to be

█ ...unclear....to be September, or late September, October, ..unclear...

BC He was here at your house

█ Yeah

BC So was █?

█ Yup

BC And did he tell you that he had picked █ up from school?

█ Yeah

BC Mr. MacRae said that?

█ Yes he did.

BC And he asked to take him for a ride, at that point?

█ He told me he was going to take █ down to Friendly's, I think it was,

BC There's a Friendly's in town?

█ Yes, right down the end of the street

BC And he did leave with him?

█ They weren't even gone five or ten minutes and █ was right, at the front door, he was home

BC Was there any conversations █ had after he returned, did you ask him any questions?

█ No, I think he went right to his room.

BC Did he appear to be upset, or is that normal behavior?

██████████ Quiet.....

BC Is that normal behavior for him, or unusual?

██████████ was always up and down - was either very very talkative or very very quiet. But after when he was with Mr. MacRae, Father, I don't like to call him, Mr. MacRae, he always seemed to go in his room and was quiet. A few times he, it was a different period when Father MacRae had dropped him off at the farm, when we were living at the farm. One evening he asked to speak to dad - to you (referring to ██████████). Remember, and he had asked you, we had company - ah, my mother was there visiting, and he said "dad, I gotta talk to you and come in the bedroom and talk to me", and that's when he had asked you "can priest's be gay?"

BC Uh-huh. O.K., so this is when you were living on ██████████ Road

██████████ Yeah, right

██████████ Right.

BC How many ti.....how often did ah Mr. MacRae and your son ██████████ spend together? How much time?

██████████ I don't know, I worked most of the time.

██████████ I bet you ██████████ was at the rectory every week.

BC Was that once a week? A few times a week?

██████████ Could be every day after school for all I know.

BC Has ██████████ told you how often he was there?

██████████ No

██████████ Oh, I think when he first met him he was there quite often, and he would call him up quite a bit. Because even Father MacRae told me that.

BC And what school was he picking him up at?

██████████ Ah, he was picking him up at the Hampton Academy.

BC And where is that located?

[REDACTED] Its right up the street, off of High Street

[REDACTED] Yeah, High Street

BC How far from the rectory?

[REDACTED] About a miles

[REDACTED] No, not even a mile, it was right across the street

[REDACTED] Maybe a half mile

BC Did Mr. MacRae have permission from the school to pick up your son?

[REDACTED] I don't know

[REDACTED] No

BC Did he have permission from you?

[REDACTED] No

[REDACTED] No, no

[REDACTED] No, we never gave him permission

[REDACTED] No, I never knew he was picking him up after school

BC Do you know what he was driving at that time, do you recall?

[REDACTED] Was it a station wagon?

[REDACTED] I don't remember

[REDACTED] Didn't the church have a station wagon? I believe it was a gray station wagon. I'm not positive.

BC So [REDACTED] started going to Sacred Heart and

[REDACTED] Uh-huh

BC And what can you tell me about his education at Sacred Heart?

[REDACTED] He did better at Sacred Heart. That's when, ah, Father Gordon had been transferred when he started Sacred Heart. But he wasn't in school very long when,

ah, we started noticing he was getting quieter and having like little nervous breakdowns, and getting upset, giving us a hard time. That was his of, like he wanted to say something, but couldn't. Ya know, wanted to tell us things, but couldn't.

BC Did he - did you ever pry to

[REDACTED] No

BC Probably pry is the wrong word, but ah

[REDACTED] No

BC Ask him what was wrong and

[REDACTED] No, he would never, never talk about it

[REDACTED] No. I had started

[REDACTED] He had started with the counseling

[REDACTED] Right

BC When did he start with the counseling?

[REDACTED] I went to the rectory and I think it was Father Watson was there at the time, and there was one, [REDACTED] started ah, like not coming home when he was told to, like he was ya know, with his little friends - I want you home at a certain time - he wasn't coming home, different things. He was starting to get a little bit rebellious, and ah, he wasn't bad, he was just, ya know, it was just not like him not to do what we asked him to do, and ah, I went to the rectory and I asked for help because I knew there was, I just had this gut feeling there was something wrong, really wrong. And ah I asked Father Watson for help and he said that, ya know, he didn't know what he could do for me but talk to me, maybe and [REDACTED] together, or something like that and I think we had one conversation with him, the two of us, and then I went another time and I asked for help. I went a third time and I asked for help and he said "Lady, the only thing I can do for you, he says, is give you this, he says, send you to, ah, Catholic Counseling, no it's not Catholic Counseling it's called ah

BC Catholic Charities

[REDACTED] Catholic Charities. And that's how I got Judy Paterson, and then I started taking [REDACTED] weekly to Judy Paterson for counseling. And little by little it came out with Judy that, ah, Father MacRae had done something.

BC And what came out at that time do you recall?

It was more or less fondling, that came out at the time

...unclear....(over-talking)

because that's what she called it, because I think [REDACTED] was always afraid to come out and say anything. I think he kept it all bottled in.

BC And who made you, who first made you aware of this abuse?

Judy did

Judy did.

And when I, ya know, when we used to go there together at times and times that she'd be [REDACTED] be, she would meet [REDACTED] alone, or sometimes she would have parents either one of us or both of us there

Right

for, ya know, in between talking to him, and she's the one that, ah, told us that MacRae had sexually molested him, she said, but it was called fondling, that's what they determined it was, that what she had reported. I asked her at that time "well shouldn't I report this to the Hampton Police?" And she said "no, you don't have to because I reported it to the Keene Police; I reported it to the DYS; and I reported it to the

Right

Catholic Diocese, the diocese in Keene." She said the main thing we gotta do is to get him some in-patient counseling, and she said the best place for that is the Hampstead Hospital. Then she asked me if I had medical coverage, and I told her I did.

Right

So we, ya know, I gave her my Blue Cross number and stuff, then she made arrangements to have him, ah, put into the hospital there. So, maybe a couple of weeks later he was admitted, ya know, the whole month of December of '83 he spent in the Hampstead Hospital.

BC You paid for the Hampstead Hospital?

[REDACTED] Blue Cross/Blue Shield did.

[REDACTED] That's not the reason, he wasn't admitted just because of that, though, in the hospital.

[REDACTED] Yeah, she said that, that ah

[REDACTED] Because that weekend he had, we had an episode with him in his bedroom

[REDACTED] Prior to going in there?

[REDACTED] Yeah

[REDACTED] ...unclear...don't remember

[REDACTED] That's when we talked to Judy, she said that she thought he should be hospitalized.

[REDACTED] Was she, after he....

[REDACTED] Wasn't it?

[REDACTED] No, she told us right there at the counseling that, ya know, after he, she said he needs some, ya know, in - in-patient type counseling

BC So, Judy made the disclosure to you - during, during

[REDACTED] Yeah

BC your counseling session?

[REDACTED] Uh-huh.

BC Judy Paterson. And, sometime after this disclosure, your son had an episode in his bedroom?

[REDACTED] Yeah, he got very angry one evening in his bedroom, and kind of just threw some stuff around in his room, busted up his father's picture, ya know, and he had cut himself and I had reported it to Judy and umm,

[REDACTED] Yeah, but ...unclear...

PC I had called, I had called my oldest son to come down and help us cause we were very distraught and crying and upset and [REDACTED] was crying and his brother came ho.....his older brother was stationed out at Pease at the time, and he came in and helped us. He wouldn't let us in and [REDACTED] let his brother in and [REDACTED] had, umm,

calmed him down and talked to him and everything, and I happened to say [REDACTED] to my, my oldest son [REDACTED] I says "it's Father Gordon isn't it?" And he, and my oldest son started to cry. He says "yeah".

BC How much of a time lapse was it between the time that Judy told you about the disclosure to the time, to this time in the bedroom where he was out of control?

[REDACTED] That happened before he went in the hospital, that's when I had, we, I had called Judy and that's when we decided that he needed to be hospitalized. I remember that episode very good.

[REDACTED] Yeah, because there's a waiting list, ya know

[REDACTED] We have to wait

[REDACTED] There was a waiting list, but apparently she got around that by getting him in there quickly.

BC So this, the episode as you put it in the bedroom, pointing in that direction, the episode in the bedroom took place after disclosure was made, but before he went into Hampstead Hospital.

[REDACTED] I'm not sure, myself, I

[REDACTED] No, it....that's,

BC If you don't recall, that's understandable.

[REDACTED] I really, I think it was - it all happened like, like it all falled in that one week, ya know, I think it just all kind of exploded that one week. It all came kind of out, ya know, between [REDACTED] and me putting things together and Judy, ya know, knowing ya know. I always suspected - in the back of my head - ya know, and that's like, when I had asked him on the telephone, ya know, if he had ever touched my son and I had asked and he says ya know, we couldn't believe a, couldn't believe a priest would do that to a child. I says, "I do"

BC When did you speak to, ah, Mr. MacRae on the phone about this, when you asked him...

[REDACTED] I was living at the farm

BC if he ever abused?

[REDACTED]unclear....prior to the counseling and prior to his going to the catholic school.

BC And what did Mr. MacRae tell you when you asked him if he ever abused your son?

He said, he he told me, he puts his arm around kids, and pats them on the head, and pats them on the shoulder to make them feel important. He says that's how he touches the kids.

BC You said earlier, was there a time lapse between when he answered you and

Yeah

BC you asked him that.

Kind of quiet, kind of like chuckled it after, ya know what I mean. But, ya know and he told me, he says, "you take notice of - of ah - I think you need, he says, "notice the friends that he hangs around with", he says, that like, ya know that has low self esteem, and he's tripping over his feet to please his father and umm, he was like, everything started to be like needs to be evaluated, things were, ya know,

BC O.K.

To me he was trying to blame my son for something, I don't know.

BC O.K., when he umm first started to see this Judy Paterson for counseling at Catholic Charities, now was that, who actually decided that he should go there? Was that you or the church?

Umm, I, that's when I went to the rectory and asked Father Watson for help and he said he didn't know what he could do for me, but he could give me, ah, he gave me a card with Judy Paterson's - or a number to call, and I got in contact with her and made the appointment.

BC Who paid for that?

I don't know who paid for it. We didn't pay for anything.

Yeah. She used to come down to Seabrook once a week to do counseling with other children, and that's how we started going there once a week with

BC You paid for the school, for Sacred Heart?

Right. But we've never paid for any counseling.

No, uh.....

BC Who paid for Hampstead Hospital?

Blue Cross/Blue Shield

BC Do you know who his primary doctor was?

...unclear..

BC Do you recall a - a Doctor Jackson?

Jackson was a psychiatrist I believe that used to meet with [REDACTED] probably once a week, something like that.

Oh yeah, the elderly man

The one that said that [REDACTED] should be a lawyer

Yeah (laughter) gave him a good argument (laughter). He's - He's a smart kid, alright.

BC Do you have any documentation of when [REDACTED] went to Hampstead Hospital, do you have any paper documentation from Hampstead, or?

Didn't we think the bill was more than that - but we don't know, whoever paid for it, or whatever happened to it?

BC You mean there was a difference between what Blue Cross covered and the actual bill?

I don't know. We never did see it.

We never did see it. We couldn't figure it out.

The only thing I - I do remember getting - getting an employee benefit statement from Blue Cross/Blue Shield, and it was like twenty thousand dollars, something like that. I don't know what the actual cost was, or anything, if it was over that, under that. [REDACTED] has all of the documentation, I believe that he got from the hospital.

Does he, yeah.

BC [REDACTED]

Yes

0-218

BC did you speak with the Principal of Sacred Heart at any time, a Mr. Jeffrey Quinn

[REDACTED] Yes I have

BC And, what are your conversation with reference to your son?

[REDACTED] Ah, that night, remember the night I just was telling you about, the little episode in his bedroom, when we thought he was having a nervous breakdown. I thought it would be best for him, if he tried, and put that behind him, and go to school the next day, and, umm, I can't believe if we brought him in late, or if he had missed a day, or what it was, but I remember telling him that [REDACTED] had had a, kind of like a little nervous breakdown, but we want him to go to school, and ya know, do the best he can. And he said "if he had a nervous breakdown, he's got no business being here", or something like that.

BC Do you recall the principal, Mr. Quinn?

[REDACTED] Yes I do.

BC Did you have a conversation with him by phone, umm, where you accused the church of a bit of cover up, reference your son being molested?

[REDACTED] No, not I

[REDACTED] Not I

BC O.K. Did you receive any letter or any correspondence from [REDACTED] while he was in Hampstead Hospital?

[REDACTED] From [REDACTED]

BC From [REDACTED]

[REDACTED] No, cause we used to go up there and see him almost every night, and we, let's see, we were allowed to take him after, what, two or three weeks, or something like that, he was allowed to come home for a weekend; then he was allowed to come home for Christmas, but then go back ya know.

BC Do you recall when and whom did you first speak to, ...unclear... a church official, reference the ah molestation?

[REDACTED] Never spoke to a church official,

BC They - did you ever speak to a Reverend Quinn?

█ No. Ya see, he had Judy pass the word on to us, but he never spoke, I don't remember speaking to him, ya know, personally. Never met him, or anything, he was, I don't even remember talking to him on the telephone. He never even had the decency to call up here. But he did say that, in the letter that we got from DYS, was it, that he offered his, umm, any support and stuff like that, and all I had to do was to call himunclear.....which we never did.

█ I was kind of angry and I - I had told Judy ya know, what - what could they do, ya know. There was noth'n they could do, actually to help us, to remove the pain, so I just, we never bothered corresponding with them. But we did receive a letter

█ Not from him

█ Not from him; by the DYS, yeah

█ From DYS

BC And that was about Mr. - Reverend Quinn?

█ Yeah, they mentioned in there that they went ahead and made ya know, offer of support and something like that, but, ya know. It was through an intermediary, it was never - never through him personally.

BC So you had no direct contact with the church ...unclear

█ Only through Judy and that - that one letter from the DYS. Even, we didn't even hear from DYS until '86 for crying out loud.

BC Excuse me. Did Judy Paterson tell you what the church was going to do, what their process or protocol was in handling this case? Or what her protocol was to handle this case?

█ I can remember correctly

█ Only that he was getting counseling, or something like that, ..unclear... was going to get counseling, or something like that...unclear

█ That's all I can remember.

BC Did they say whether he would have the opportunity to work with children?

█ No

█ No

BC I'm shutting the tape off.....

BC Tape's back on.....

BC Mr. and Mrs. [REDACTED] did you have any of, any conversations in person with Jeffrey Quinn at the school or otherwise?

[REDACTED] The only one I can re..., recollect is when I was either taking [REDACTED] back to school after he had been absent from school for a while, and I believe he had questioned me and had asked me "is it true, did - did Father MacRae really do anything to [REDACTED]?" And I had said yes, that [REDACTED] was, ya know, telling the truth. It looked to me like he had a hard time believing it. His face was startled, ya know.

BC Did, umm, tell me about [REDACTED] artwork.

[REDACTED] Drawings and stuff like that?

BC Uh-huh

[REDACTED] He did quite well at, ah, the Hampton Academy where they had art classes and he was pretty good at it there, I guess. Some of the drawings that he got, got to be kind of morbid at times - but some of ya know, some of the other cartoon type drawings were quite - well were quite good.

[REDACTED] He had a whole booklet full of any kind of airplane you could think of; all the details on the airplanes; all kinds of things he could draw, that kid.

[REDACTED] And also, in ah, at the Hampstead Hospital, you remember that, one of the counselors there was kind of like a child ah

[REDACTED] Book writer

[REDACTED] Yeah

[REDACTED] And [REDACTED] used to make sketches that go along with the stories that, I don't remember his name

[REDACTED] They wrote a book and [REDACTED] did all of the illustrations for him, for his book. I don't know if it was ever used, but, I still, matter of fact, I've still got some of the illustrations downstairs in the cellar in [REDACTED] trunk.

BC Yeah, I guess I was going to ask you if you still had any of the artwork, and I guess you do.

[REDACTED] Yeah

BC You spoke of the artwork at times being morbid. Can you articulate what you mean by that.

[REDACTED] Well some of the pictures that he drew were like ah devil

[REDACTED] Cof.....

[REDACTED] devil type pictures

[REDACTED] Coffins

[REDACTED] They were - death, probably similar to the death, something like that

[REDACTED] Yeah

BC Did anyone, did Judy ...unclear.... or any other therapist from Hampstead Hospital tell you what they - they may mean, why he was drawing them?

[REDACTED] No, he always used to draw things about coffins and things and everything, and that's when he went and got, and then later on when he was about 13 or 14 years old he got a job at - at a funeral parlor

[REDACTED] [REDACTED]s

[REDACTED] [REDACTED] and I says, I says, he was almost like he was, umm, curious about death, that's how I took it. He was curious about death

[REDACTED] Well he wanted

[REDACTED] or afraid to die, or thought he was going to die.

[REDACTED] But he - ya know, he worked over there doing odd jobs, cleaning the cars, ya know, washing the cars and stuff like that, I mean, got more interested in it.

BC After he was treated at Hampstead Hospital, you said that was approximately for about a month

[REDACTED] Uh-huh

[REDACTED] Thirty days

BC Was there any other treatment followed up after that?

Well, he continued with some counseling with Judy shortly

Right

not for a long period of time, but after he got out, till Judy got transferred.

BC Tapes been turned over.....

Seven thirty five

BC Seven thirty five. After [redacted] did he graduate from Sacred Heart?

Yes he did.

BC And where did he - where did he go to school after that?

Saint Thomas Aquinas in Dover.

BC Is that a religious

Catholic....it's a catholic school

BC Catholic school

It's a high school

BC Who paid for the high school?

We didn't

Yeah, it was, ah,

Through Judy

Judy said there are benefactors that would sponsor ya know, needy children that were willing to go to school like that....I don't know who paid for it...unclear

BC You didn't pay for it?

No

No

BC You were never sent any bills

[REDACTED] No, never

BC For the tuition?

[REDACTED] No

BC O.K. Ah, tell me about that school. How did [REDACTED] do in Saint Thomas?

[REDACTED] His grades weren't bad. He was doing well, but, he still had emotional problems.

BC Did you have the opportunity to talk to any psychiatrists or doctors from the new school, ...unclear....Doctor Brown?

[REDACTED] All that Doctor Brown was

[REDACTED] At Winoconnett

[REDACTED] was when he left Saint Thomas, after a year, he went over to, when he was dismissed from Saint Thomas Aquinas, he went over to Winoconett High School in Hampton

[REDACTED] And that was the fall of his 10th year. He completed the 9th grade at - at Saint Thomas, and started the 10th grade

BC Why did he leave Saint Thomas?

[REDACTED] Well he, he brought, he supposedly was told he brought some weapons into school with him, which was my hunting knife, and a couple

[REDACTED] Bar-B-Q he brought to school, he had in a big jacket, he was going through that period with his, couple of his friends in school, where they were watching these -

[REDACTED] Yeah A-Team

[REDACTED] A-Team was kind of like his hero's ya know, and this stuff, ya know, it was the A-Team and him and his friend, they used to make tapes together, watch the movies, the A-Team and everything, and - and umm, he was, I didn't see it leave the house, but evidently he brought my husband's Bar-B-Q set to school or something

[REDACTED] No it was...unclear....yeah

[REDACTED] And brought part of the Bar-B-Q set

[REDACTED] Oh, I didn't hear about that

And so it was considered weapons and we were notified and they suggested that [REDACTED] would be dismissed from school and we had put him in Winoconneth High School.

BC So he finished his 9th grade?

[REDACTED] Yes

[REDACTED] Yes he did

[REDACTED] And started in 10th grade

BC And then in the fall went into the 10th grade?

[REDACTED] Right

BC At Winoconneth?

[REDACTED] Right, at Winoconneth High School.

BC Tell me about that

[REDACTED] Which is a public school, and ah he still had some emotional problems there. He wasn't too happy going to the public school. He really wanted to stay in Saint Thomas, and ah, then he started, he had a wonderful counselor, a Doctor Brown that counseled him there, when [REDACTED] had problems and ah he really, he helped, he was a big help to both of us. [REDACTED]

BC Why, why is that?

[REDACTED] Well, [REDACTED] had gone in to him, evidently, and poured his heart out to him and told him everything, ya know, and that's when he told us, ya know, that, about [REDACTED] molestation. It was like more came out with him than it did with Judy. He was more open with him, maybe because he was a male, ya know, telling him about his time with Father, ah MacRae. More seemed to come out.

[REDACTED] And then the, ah

[REDACTED] Then he had to report it, cause

[REDACTED] He reported it to the Hampton Police Department

[REDACTED] it was his duty.

[REDACTED] and then ah, what's his name, Juvenile Officer, Mr. Wardell

7-225

█ Uh-huh

█ Came down here, one night there, we talked about this, and what he was going to do. He - he told me right then and there that, ah, I had no - no basis for a criminal case, but I did have for a civil case ya know, but after we discussed this with a lawyer and found out what █ would have to go through, ya know, would be too grueling for him at the time; he was very fragile. Anyways, █ would up going into the Portsmouth Hospital for what a week

█ I think it was more than that

█ ...unclear...

BC O.K. What hospital was that?

█ Portsmouth, it's called Portsmouth Hospital at that time.

BC Why did he go there?

█ He was on the verge of having a nervous breakdown, I guess

█ Said he didn't want to live anymore. He was depressed.

█ So Mr. Brown, Doctor Brown ya know, recommended he go there for ya know, a week or so anyway, just to see if he could get him back on a level. And he also started seeing what - Dr. Korn, once a week, something like that, another psychiatrists out of the Portsmouth Hospital Area.

BC Dr.?

█ Korn - (spells out) I don't remember the exact dates on that thing.

BC Do you recall when it was, what year it was when he went into Portsmouth Hospital?

█ I want to say '87.

█ I'm not too sure.

BC You said Dr. Brown was a big help to █, but also to both of you.

█ He was a big help to me when I - I went in there a couple of times and he talked to us as parents. I think he talk....were we always together, I think I was, maybe alone one time with him, and everything. Cause █ seemed to have taken more

of his frustrations out at - on me, more than his daddy, and I think it's probably because he probably knew that I knew or was embarrassed or what, and he used to say "well, ya know, children that have been hurt that way usually do take it out on the people they love the most", ya know. [REDACTED] and I were having a difficult time together.

BC Dr. Brown made a disclosure to you that [REDACTED] had told him that he had been molested?

[REDACTED] Right

BC Can you give me some sort of the details of what Dr. Brown told you?

[REDACTED] He didn't specify

[REDACTED] He didn't specify, no.

[REDACTED] ...unclear...ya know, that he had been molested and ah

[REDACTED] Nothing was ever specified to us

[REDACTED] ...unclear...Judy ...unclear

[REDACTED] Nothing, no details except for I believe you took [REDACTED] down to the police sta.... Hampton Police Station once and made a tape recording

[REDACTED] With the DYS and the Hampton Police

[REDACTED] And all I know is about, is a spider game, that I remember that, years ago [REDACTED] talking about a spider game that Father Gordon would want him to play with him.

BC What is the spider game?

[REDACTED] You touch, he touched one leg and then he touched the other leg, and then you touch the middle leg, or something like that.

BC Did [REDACTED] ever describe to you or to see him describe to anyone else what the spider game was besides verbally?

[REDACTED] Na.....no

BC Physically describe it

[REDACTED] Not to my knowledge.

BC Is there anything else you have to add?

[REDACTED] Can't think of anything else right now.

BC Did [REDACTED] make any disclosures later on over the years, since '87 to you as a family? Have you spoken....

[REDACTED] About what Father MacRae had done to him

BC right, have you spoken with him

[REDACTED] physically?

BC physically?

[REDACTED] Yeah, well [REDACTED] would, I think [REDACTED] did, what's the last time when you went to him and you talked to him, and he was crying, said something about a gun?

[REDACTED] No he said, yeah he did say MacRae had guns, but he ...unclear

PC But we knew that anyway, a long time ago

[REDACTED] Yeah

[REDACTED] And we always thought maybe that's why [REDACTED] was obsessed with dying because he was afraid that Father Gordon would do something, cause he knew he had a gun.

BC Do you know

[REDACTED] Cause he had told [REDACTED] he had been on the Baltimore Police Force or something. He had given him a T-shirt, I remember that said Baltimore Police on it or something, didn't it?

[REDACTED] ...unclear....

[REDACTED] And he gave that to [REDACTED]

BC Does anyone still have that shirt?

[REDACTED] Oh I think [REDACTED] threw that away

BC Did

[REDACTED] Judy told him when he was going through counseling with Judy, I think like Judy even told him to. I remember one evening he came out of his bedroom and he had pictures of Father MacRae and he threw them in that umm, wood stove. That was through the counseling with Judy.

BC Did Mr. MacRae ever tell you that he was a police officer?

[REDACTED] Never told me. [REDACTED] said that he had told [REDACTED] that he was.

BC O.K., ending the interview at

[REDACTED] 7:45

BC 7:45.....

... end of tape

D-229

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

April 17, 1997



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PERSONAL AND CONFIDENTIAL

Fr. Edward J. Arsenault
Diocese of Manchester
153 Ash Street
P.O. Box 310
Manchester, NH 03105-0310

Re: [REDACTED] v. Diocese of Manchester
and Gordon MacRae
[REDACTED]

Dear Father Arsenault:

Enclosed is a letter recently received from Peter Gleichman, attorney for [REDACTED]. You recall that [REDACTED]'s case was dismissed last summer following the hearing on the statute of limitations. He is still asking for money, but now on a "moral" basis.

As a legal proposition, the Diocese has absolutely no obligation to [REDACTED]. As he makes the request following extensive legal proceedings and much publicity, I recommend against any assistance. However, the decision is yours and I will communicate your decision to Mr. Gleichman.

Very truly yours,

A handwritten signature in dark ink, appearing to be 'J. Higgins', is written over a horizontal line.

James E. Higgins

JEH/slb
Enc.

9026

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CHARLES A. GRIFFIN
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
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MAINE
PETER A. GLEICHMAN

April 16, 1997

James E. Higgins, Esquire
SHEEHAN, PHINNEY, BASS & GREEN, P.A.
PO Box 3701
Manchester NH 03105-3701

RE: [REDACTED] v. Gordon J. Macrae and the Diocese of Manchester

Dear Jim:

At the risk of being bold, I am writing to you in connection with the above-referenced matter. It is my understanding that all of the other civil cases, involving the [REDACTED] brothers, have been settled. Notwithstanding your success in having [REDACTED] civil action dismissed on the basis of the statute of limitations, I am writing to you to inquire as to the Diocese's willingness to provide catholic assistance to [REDACTED]

As Judge Conboy pointed out in her decision, [REDACTED] was traumatized by what Gordon Macrae did to him while in the service of the Diocese of Manchester. He is in need of psychological counselling, but is not in a position to afford it. To what extent, if any, is the Diocese willing to acknowledge its moral obligation to help [REDACTED] This could be accomplished through a structured mechanism to pay for [REDACTED] psychological counselling in Florida, where he now lives.

I seek nothing for anyone in this request except for [REDACTED]. Again, I realize that the request I make in this letter is unconventional in light of what has gone before. However, it is only because of my firm commitment to try to help [REDACTED] in any way I can that I write this letter with his prior authorization.

I would appreciate it if you would present this letter to the Diocese for a response.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman, Esquire

PAG:lh
cc: [REDACTED]

PROFESSIONAL
ASSOCIATION

March 13, 1997



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PERSONAL AND CONFIDENTIAL

Fr. Edward J. Arsenault
Diocese of Manchester
153 Ash Street
P.O. Box 310
Manchester, NH 03105-0310

- Re: [REDACTED] v. Gordon MacRae and The
Roman Catholic Bishop of Manchester
[REDACTED]
- Re: [REDACTED] v. Gordon MacRae and The
Roman Catholic Bishop of Manchester
[REDACTED]
- Re: [REDACTED] v. Gordon MacRae and The
Roman Catholic Bishop of Manchester
[REDACTED]
- Re: [REDACTED] v. Diocese of Manchester
and Gordon MacRae
[REDACTED]
- Re: [REDACTED] v. Diocese of Manchester
[REDACTED] v. Diocese of Manchester

Dear Father Arsenault:

I have your fax of March 12th. With regard to the [REDACTED] cases, I forwarded to you yesterday copies of our complete billings to date in each of the three cases.

With regard to [REDACTED], on February 14, 1997 I forwarded copies of our complete billings to date to both you and [REDACTED].

GREEN
PROFESSIONAL
ASSOCIATION



TORNEYS AT LAW

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With regard to [REDACTED], I enclose our complete billings to date herewith.

With regard to [REDACTED] and [REDACTED], I wrote to you on February 7th explaining our billings on these two matters, which were never litigated. I enclose a copy of that letter for your reference.

Should you have further questions, do not hesitate to contact me.

Very truly yours,

James E. Higgins

JEH/slb

Enc.

cc: Bradford E. Cook, Esquire

BASS -
GREEN
PROFESSIONAL
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January 7, 1997

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Mr. Raymond Dumont
Gallagher Bassett Insurance
Bedford Commons
Bedford, NH 03110

Re: [REDACTED] v. Roman Catholic Bishop
of Manchester, Gordan Macrae and Father
Boucher
[REDACTED] County Superior Court

Dear Ray:

I have your inquiry of December 20th. As you know, [REDACTED] case was dismissed by the Trial Judge as being brought beyond the limit set by the statute of limitations. A Motion for Reconsideration was filed which was denied. [REDACTED] had thirty days from that denial to appeal to the New Hampshire Supreme Court. He failed to do so. Therefore, that case is at an end.

[REDACTED] claim was insured in the same fashion as the [REDACTED]. I enclose a statement reflecting fees paid, costs paid, and the current amount outstanding in connection with this matter.

Very truly yours,

James E. Higgins

JEH/slb

Enc.

cc: Bishop Christian
Father Edward Arsenault

UNBILLED
 AMOUNT---* FEES/COSTS ***TO-DATE** *-UNBILLED-*
 0118.82 Fees: 000040.78 \$1.00
 0: \$1.00 Costs: 00024.48 \$1.00
 0: \$1.00 Other: \$1.00
 1: \$1.00
 *****-LAST BILL* *-LAST PAY*
 Date: 12/31/1996 10/17/1996
 located Payments: \$1.00 Amount: \$218.82 \$12786.03
 rim Bills: \$1.00 ***-BALANCE-* *-RETAINER-*
 Last Time: Trust:

NT SUMMARY: 06423

Diocese of Manchester

A/R: 0-30:

-Last Pay-

31-60:

Unbilled T/C:

61-90:

91+ :

Total:

Total Investment:

GALLAGHER BASSETT SERVICES, INC.

December 20, 1996

Atty James E. Higgins
Sheehan, Phinney, Bass & Green, P.A.
PO Box 3701
Manchester, NH 03105-3701

Re: [REDACTED] v. Diocese of Manchester

Dear Jim:

Please provide a narrative status update on captioned matter.

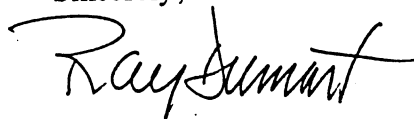
Has there been any appeal to the NH Supreme Court by the plaintiff?

How long does the plaintiff have to file an appeal to said court?

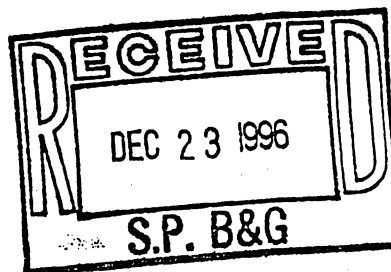
Please provide your advice relative to future handling, on your part, should there be no appeal.

Thank you.

Sincerely,



Raymond L. Dumont
Branch Manager



BASS -
 GREEN
 PROFESSIONAL
 ASSOCIATION



ATTORNEYS AT LAW

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 SUITE #103
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 NEW HAMPSHIRE
 03301-5089
 FAX 603-224-8899
 603-223-2020

September 17, 1996

Catalina J. Sugayan, Esquire
 Lord, Bissell & Brook
 115 South La Salle Street
 Chicago, IL 60603

Ms. Wendy Young
 Interstate Insurance Group
 55 East Monroe Street
 Chicago, IL 60603

Re: [REDACTED] v. Roman Catholic Bishop
 of Manchester, et als (744)

Re: [REDACTED] v. Roman Catholic Bishop
 of Manchester and Gordan MacRae (743)
Interstate Claim No. [REDACTED]

Re: [REDACTED] v. Roman Catholic Bishop
 of Manchester and Gordan MacRae (742)

Re: [REDACTED] v. Roman Catholic Bishop
 of Manchester, Gordan MacRae and Father
 Boucher (746)
Interstate Claim No. [REDACTED]

Lord Bissell & Brook's File No. [REDACTED]

Dear Ms. Sugayan and Ms. Young:

Our Motion to Allow Interlocutory Appeal has been
 denied in all three [REDACTED] cases. Hence these cases will
 go forward to trial. [REDACTED] final Motion failed and
 hence that case is dismissed. [REDACTED] only remedy
 now is appeal to the New Hampshire Supreme Court.

We have received a settlement demand from counsel
 for [REDACTED] in the amount of \$600,000. As I
 understand that this demand will implicate both
 companies, I now put you on notice that settlement of
 [REDACTED] case as well as the other cases may well

be possible within the next several weeks. A structuring conference is scheduled in these matters for 9:00 a.m. in the [REDACTED] County Superior Court on Wednesday, [REDACTED]. Well before that time I would like to talk to each of you concerning an evaluation of these cases and your respective companies' willingness to contribute to a settlement at this time.

Very truly yours,


James E. Higgins

JEH/slb

cc: Mr. [REDACTED]
Mr. [REDACTED]
Bishop Christian
Father Edward Arsenault

SMITH
 BERRY
 BASS &
 GREEN
 PROFESSIONAL
 ASSOCIATION



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September 17, 1996

PERSONAL AND CONFIDENTIAL
 ATTORNEY CLIENT PRIVILEGE

Auxiliary Bishop Francis J. Christian
 Diocese of Manchester
 P.O. Box 310
 Manchester, NH 03105-0310

Re: [REDACTED] v. Gordon MacRae and
 Roman Catholic Bishop of Manchester

[REDACTED] v. Roman Catholic Bishop
 of Manchester and Gordan MacRae [REDACTED]

[REDACTED] v. Roman Catholic Bishop
 of Manchester, Gordan MacRae and Father
 Boucher [REDACTED]

[REDACTED] v. Roman Catholic Bishop
 of Manchester and Gordan MacRae [REDACTED]

Dear Bishop Christian:

Our Motion to Allow Interlocutory Appeal has been denied by Judge Conboy. Therefore, this matter will go forward to trial. She also has once again affirmed the dismissal of [REDACTED] action, and therefore [REDACTED] only recourse is appeal.

Pursuant to my request, Mark Abramson has delivered a demand for final settlement of all claims in [REDACTED] case of \$600,000. I could not recommend accepting such a demand. Under any circumstances, such a demand clearly implicates the next two levels of insurance coverage and I will so inform our insurers.

I do not believe that we are now in a position to make a counter-proposal without insurance company approval. The legal fees allocated to [REDACTED] case when added to even a minimal counter-proposal involve at least the next layer of coverage (Lloyd's). I assume to settle the matter the Diocese would be willing to pay the difference between what has been billed on this file and the \$50,000 cut-off. We know this will not settle the case and therefore I will ascertain what Lloyd's is willing to pay.

Best regards,



James E. Higgins

JEH/slb

cc: Father Edward Arsenault