

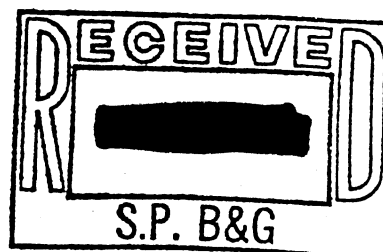
INTERSTATE
INSURANCE
GROUP

July 25, [REDACTED]

55 East Monroe Street
Chicago, Illinois 60603
312-346-6400
FAX 312-346-5748

Mr. James Higgins
Sheehan, Phinney, Bass & Green
P.O. Box 3701
Manchester, NH 03105-3701

Re: Insured: Diocese of Manchester
Claimant: [REDACTED]
Claim No: [REDACTED]



Dear Mr. Higgins:

This letter references notice to us of a sexual misconduct claim with respect to [REDACTED], the Diocese of Manchester and Father Gordon MacCrae and will serve to inform you of Interstate Fire & Casualty Co.'s (IFC) position with respect to coverage under the policies.

IFC provided excess liability coverage to the Diocese of Manchester from September 10, 1978 through September 10, 1979 under policy #83-0152629, which was renewed for the subsequent policy periods of September 10, 1979 to September 10, 1980, September 10, 1980 to July 1, 1981 and July 1, 1981 to July 1, 1982. The policy was again renewed for the policy periods of July 1, 1982 to July 1, 1983 and July 1, 1983 to July 1, 1984 under policy #83-0169754. It was renewed for the policy period of July 1, 1984 to July 1, 1985. The policy was renewed for the last time under policy #83-0172446 for the policy period of July 1, 1985 to July 1, 1986. These policies provided excess general liability indemnity coverage with limits of \$4.8 million, excess \$200,000 provided by the Diocese's self-insured retention and Lloyds.

Interstate Fire & Casualty Company
Chicago Insurance Company
Interstate Indemnity Company

Member Companies of The Fireman's Fund Insurance Group

IFC's policy of insurance is "following form" to the Lloyds policy, and the provisions of the immediate underlying policies are incorporated as part of this policy.

The Complaint states that from 1979 through 1987 defendant Gordon MacCrae engaged in unpermitted sexual contact with the plaintiff. We have not received details on the nature of the abuse or the extent of the injuries.

IFC's policies are excess in nature and, therefore, are not triggered until the underlying policies are exhausted. Liability shall attach to IFC only after the underlying insurer(s) have paid or have been held liable to pay the full amount of the respective ultimate net loss liability.

Coverage attaches only for those persons who qualify as an insured. Generally, insured is defined to include an official or employee of the named insured while acting within the course and scope of his duties as such.

Based on the information provided, it is IFC's opinion that if the allegations are proven, Father MacCrae was acting outside the course and scope of his priestly duties and for his own self-gratification when he allegedly sexually assaulted [REDACTED]. Father MacCrae, therefore, would not qualify as an insured under IFC's policy, and IFC would not indemnify Father MacCrae nor allow his defense costs to be incorporated into the underlying limits and/or self-insured retention in order to reduce same, so as to activate IFC's excess liability coverage. Furthermore, there is no coverage whatsoever for Father MacCrae personally due to intentional torts or acts.

The intentional infliction of physical and/or emotional injury falls outside the scope of coverage under the definition of "occurrence" which generally requires that any such injury or damage for which coverage is claimed be neither expected nor intended.

Further, the policy specifically excludes liability for assault and battery committed by or at the direction of anyone claiming coverage thereunder.

Should it be proven that the Diocese of Manchester knew or should have known of Father MacCrae's proclivities, these activities, knowledge of the diocese of his activities, and failure to take any

action to prevent his inappropriate conduct, if proven, could void coverage. As noted above, there is no coverage for expected or intended personal injury.

Generally, an occurrence is defined as an accident or happening or event which unexpectedly and unintentionally results in personal injury or property damage during the policy period. Since the language of the Lloyd's policy, incorporated into IFC's "following form" excess policy, requires the "accident" and the "injury" to occur within the policy period, IFC would have absolutely no coverage for any claim for conduct which occurred prior to September 10, 1978, since the time frame for such claims would be prior to the inception of any coverage issued by IFC to the Diocese of Manchester. We respectfully decline coverage for any alleged misconduct occurring prior to September 10, 1978 or after the last policy expired on July 1, 1986.

The information included in the Complaint indicates that the abuse spanned several years. If the alleged abuse did in fact cover more than one policy period, IFC would like to make it clear that it does not adopt or agree with the "first encounter" theory which has been advanced by other insurers in molestation cases. It is IFC's position that any portion of injury sustained during any policy period will trigger that policy period's SIR and underlying insurance.

In support of IFC's position, we wish to advise you that the United States Court of Appeals for the Fifth Circuit has adopted IFC's position in Docket No. 93-4068, "Society of Roman Catholic Church vs. Interstate Fire & Casualty Co., et al." issued May 27, 1994. Under that decision, for each year in which the alleged abuse occurred, the Archdiocese's entire SIR and the underlying layer of coverage would have to be exhausted before any of IFC's excess indemnity coverage for that year would be triggered.

The Ninth Circuit reached a similar result in "Interstate Fire & Casualty Co. vs. The Archdiocese of Portland, et al."

The latest court to affirm IFC's position is the United States District Court, District of Minnesota, in "Diocese of Winona vs. Interstate Fire & Casualty Co.". In Supplemental Findings of Fact and Conclusions of Law filed January 17, 1995, the Court concluded that continued molestation through successive policy years will trigger a SIR and all insurance policies for each policy year in which the molestation occurs.

Depending on the law in the state of New Hampshire, there may be a statute of limitations defense in this matter rendering the claim time barred.

IFC further reserves its rights to reimbursement should we expend indemnity dollars and subsequently establish non-coverage.

Please do not interpret this letter as a denial of coverage. Rather, it is simply to advise you that IFC will act upon this loss under a full and complete reservation of rights under the terms of the referenced policies issued to the Diocese of Manchester. This reservation of rights is without prejudice to IFC's right to assert any other policy defenses which may be applicable as ascertained during further investigation of the referenced matter. IFC does not waive any of the terms or conditions of the applicable policies and does not waive any of the defenses which may now or hereafter exist for this claim.

IFC would also like to remind you of the continuing obligation of the insured to fully and completely cooperate with IFC in connection with this matter as well as of the insured's obligation to keep IFC fully informed and apprised of developments as this matter proceeds. A noncompliance with this obligation may restrict or bar coverage. Therefore, IFC requests to be copied on all pertinent correspondence and pleadings filed or served. Your cooperation in this area is highly appreciated.

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

Very truly yours,

Wendy Young

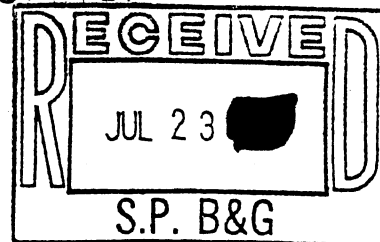
cc: Cathy Sugayan
Lord, Bissell & Brook

Tom Glaaser
Gallagher Bassett Services, Inc.

Tim McNamara
Onebane, Bernard, Torian, Diaz, McNamara & Abell

GALLAGHER BASSETT SERVICES, INC.

July 20, [REDACTED]



Atty James E. Higgins
Sheehan, Phinney, Bass & Green
1000 Elm Street
PO Box 3701
Manchester, NH 03105

Re: [REDACTED] V. Diocese of Manchester

Dear Jim:

Answers to the following questions relative to captioned matter have been solicited.

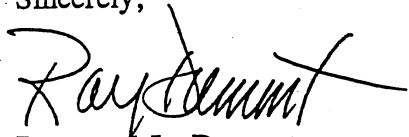
1. What was the extent of the insured's prior knowledge of Fr. MacRae's activities?
2. As Fr. MacRae is serving time for criminal charges, please advise what the ramifications sam will be with this claim.
3. Is a copy of Fr. MacRae's personal file available?
4. Please provide a copy of documentation of damages as provided by the plaintiff.
5. Please provide a copy of the plaintiff's school records for the time period before, after and during the alleged abuse.
6. Please advise the plaintiff's employment, marital and dependent status.
7. Please advise the frequency and type of abuse alleged by the plaintiff.
8. Please provide information on any formal settlement demand made by the plaintiff.
9. Please provide information on the following:
 - A. Strengths and weaknesses of the case.
 - B. Please outline your future anticipated activity on this case.
 - C. Please provide your opinion on the settlement/verdict value on the case.
 - D. Please prepare and present a budget through trial.

E. Please advise how the statute of limitations applies on this case.

F. Please address clerical immunity if any.

Thank you for your kind attention relative to this request.

Sincerely,



Raymond L. Dumont
Branch Manager

TEL : 0362027000

9774

DATE, TIME
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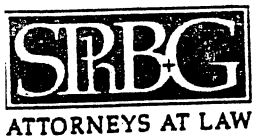
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OK
STANDARD

9775

WHEEL
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

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1000 Elm Street
P.O. Box 3701
Manchester
New Hampshire
03105-3701
Fax 603-627-8121
603-668-0300

1 Harbour Place
Suite 325
Portsmouth
New Hampshire
03801-3856
Fax 603-433-3126
603-433-2111

Please deliver the accompanying pages to:

NAME Peter Gleichman
COMPANY Griffin Swanson + Gleichman
FAX NUMBER 433-1197
FROM Bob Lucin
DATE OF TRANSMITTAL 7-19-96
TOTAL NUMBER OF PAGES (Including Cover Sheet) 6

Please call immediately if copy is not clear.

Kathy 627-8113

Comments

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9776

TEL : 18006078

DATE, TIME
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DURATION
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OK
STANDARD

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1000 ELM STREET
P.O. Box 3701
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03105-3701
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603-668-0300

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SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
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FAX 603-433-3126
603-433-2111

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

Please deliver the accompanying pages to:

NAME Pete Gleichman

COMPANY Co Dr. Shen

FAX NUMBER 772 - 7787

FROM Roland Lucic

DATE OF TRANSMITTAL July 19, 1996

TOTAL NUMBER OF PAGES (Including Cover Sheet) 6

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Comments

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9778

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

CHARLES J. GRIFFIN, RETIRED

July 11, [REDACTED]

MAINE
PETER A. GLEICHMAN

[REDACTED] Clerk
[REDACTED] County Superior Court
[REDACTED]

Re: [REDACTED] v. MacRae, et als.
[REDACTED] Docket No. [REDACTED]

[REDACTED] v. MacRae, et als.
[REDACTED] Docket No. [REDACTED]

Dear [REDACTED]:

Please find enclosed for filing with the Court Plaintiff's Motion to Exclude Cameras from Courtroom filed on behalf of [REDACTED] in connection with the above-referenced consolidated cases.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

enc. as stated
cc: James E. Higgins, Esquire
Gordon J. MacRae, Defendant pro se
Mark Abramson, Esquire
William Cleary, Esquire
Robert Upton, II, Esquire
Peter Heed, Esquire

SHEEHAN

THORNE

BASS +

GREEN

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ATTORNEYS AT LAW

1000 ELM STREET
P.O. Box 3701
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603-668-0300

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FAX 603-433-3126
603-433-2111

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

VIA FACSIMILE

July 9, [REDACTED]

Peter A. Gleichman, Esquire
Griffin, Swanson & Gleichman
56 Middle Street
P.O. Box 598
Portsmouth, NH 03802

Mark A. Abramson, Esquire
Abramson, Reis, Brown & Dugan
1819 Elm Street
Manchester, NH 03104

Robert Upton, II, Esquire
Upton Sanders & Smith
10 Centre Street
P.O. Box 1090
Concord, NH 03302

William W. Cleary, Esquire
Norton, Parent & Cleary
206 Roxbury Street
Keene, NH 03431

Re: [REDACTED]

[REDACTED] v. Diocese of Manchester, et al

Gentlemen:

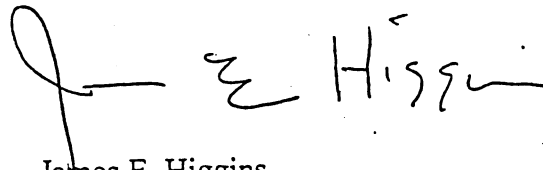
In addition to witnesses listed by Plaintiffs, the Diocese of Manchester may call some or all of the following witnesses at the upcoming hearing on the statute of limitations depending upon the evidence produced by Plaintiffs.

1. Bishop Francis Christian
2. Monsignor John Quinn

3. Debra Collette
4. Irene Grand
5. Sheila McDonough
6. Father Gerard Boucher
7. Monsignor James Watson
8. Jeanette Gagnon
9. Elizabeth Davis
10. Sylvia Gayle
11. [REDACTED]
12. [REDACTED]
13. Dr. Albert Drukteinis

We also request that each treating physician or expert who is called to testify by any of the plaintiff's at trial bring the original and a copy of their entire file related to this matter.

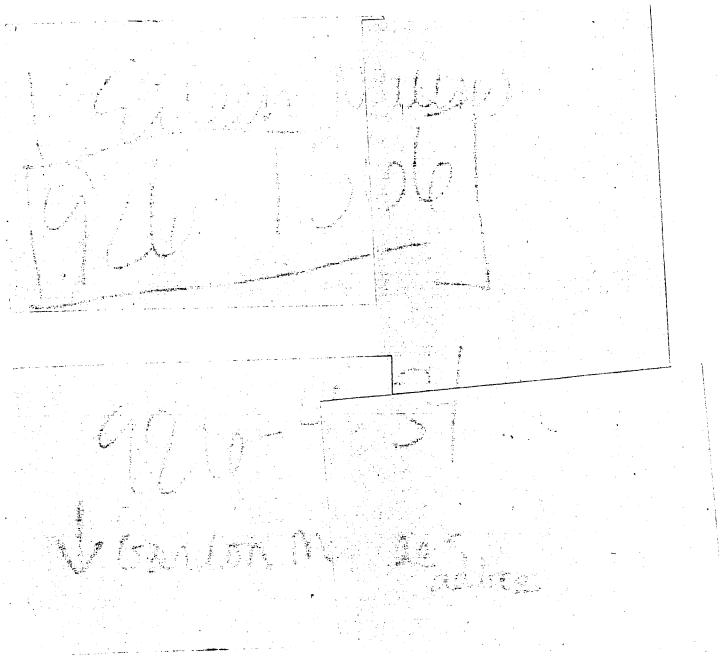
Very truly yours,



James E. Higgins

JEH/edf
Gordon Macrae, Pro Se

\\spbgmntl\public\jhiggins\6423\lt counsel 7-9-96.doc



TEL : 800-875-1234

DATE, TIME
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9782

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603-223-2020

Please deliver the accompanying pages to:

NAME Peter Allichman

COMPANY _____

FAX NUMBER 433-1197

FROM James Higgins

DATE OF TRANSMITTAL 7-9-96

TOTAL NUMBER OF PAGES (Including Cover Sheet) 3

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TEL : 80001178

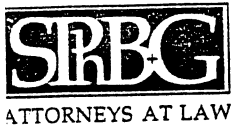
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Please deliver the accompanying pages to:

NAME William Cleary

COMPANY _____

FAX NUMBER 357-8504

FROM James Higgins

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- 9786

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OF BUSINESS
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ASSOCIATION

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03301-5089
FAX 603-224-8899
603-223-2020

Please deliver the accompanying pages to:

NAME Robert Upton

COMPANY _____

FAX NUMBER 224-0320

FROM James Higgins

DATE OF TRANSMITTAL 7-9-96

TOTAL NUMBER OF PAGES (Including Cover Sheet) 3

Please call immediately if copy is not clear.

Comments

been trying since 4:40

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LITTLE NEWS TOWN
56 MIDDLE STREET
P. O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

9788

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

July 8, 1996

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

Re: MacRae Cases

Dear Jim:

This letter will confirm our telephone conversation last week. You will take Judy Paterson's deposition here at my law office on Friday, July 12 beginning at 1:00 p.m. You will arrange for the stenographer. Ms. Paterson tells me she must be in Exeter for an client appointment at 3:30 p.m. that day, so she would like to wind down starting at 2:30 p.m. and be on her way by 2:45 p.m.

This will also confirm that I will take Dr. Derek Stern's deposition for trial testimony purposes at Dr. Stern's office at 163 Water Street in Exeter on Friday, July 19 beginning at 2:00 p.m. I will arrange for the stenographer. I have agreed that you will want about a half-hour at the beginning to informally question Dr. Stern.

If you have any questions, please do not hesitate to contact me. Thank you for your consideration in this matter.

Sincerely,


Peter A. Gleichman

cc: Gordon J. MacRae
c/o P.O. Box 14
Concord, NH 03302-0014

11 72
11 12 12 AT 12
55 MIDDLE STREET
P. O. BOX 558

9789

PORTSMOUTH, NEW HAMPSHIRE 03802-0558

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

CHARLES J. GRIFFIN, RETIRED

July 8, [REDACTED]

MAINE
PETER A. GLEICHMAN

Bragan Reporting Associates
P.O. Box 1387
Manchester, NH 03105-1387

Re: [REDACTED] v. MacRae, et als.
[REDACTED] Docket No. [REDACTED]

Dear Sir or Madam:

This letter will confirm that you will have a court stenographer at the offices of Dr. Derek Stern, 163 Water Street, Exeter, New Hampshire to take Dr. Stern's deposition (not video) on Friday, July 19, [REDACTED] beginning at 2:30 p.m. Dr. Stern's office number is 772-7377.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Peter A. Gleichman

cc: James E. Higgins, Esquire
P.O. Box 3701
Manchester, NH 03105-3701

Gordon J. MacRae
c/o New Hampshire State Prison
P.O. Box 14
Concord, NH 03302-0014

FEDERAL
BASS -
GREEN
PROFESSIONAL
ASSOCIATION

9790



ATTORNEYS AT LAW

July 8, [REDACTED]

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P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
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603-668-0300

1 HARBOUR PLACE
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603-433-2111

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

Peter A. Gleichman,, Esquire
Griffin, Swanson & Gleichman, P.A.
56 Middle Street
P. O. Box 598
Portsmouth, NH 03802-0598

Re: [REDACTED] v. MacRae, et al

Dear Peter:

This is to confirm that the deposition of Judy Patterson will commence at your office on Friday, July 12, [REDACTED] at 1:00 p.m. I have arranged for a stenographer. Please make sure that Ms. Patterson has her entire file relating to [REDACTED] so that we may review it prior to the deposition.

Very truly yours,

A handwritten signature in black ink, appearing to read 'James E. Higgins', written over a white background.

James E. Higgins

JEH:klc

9791

ATTORNEY GENERAL
Unit 8-2 One Park Avenue
Hampton, New Hampshire 03842

Phone: (800) 926-0564
(603) 926-1366

Fax: (603) 926-1368
Licensed in Massachusetts Only

July 2, 1996

James E. Higgins, Esq.
SHEEHAN LAW FIRM
P.O. Box 3701
Manchester, NH 03105-3701

Dear Attorney Higgins:

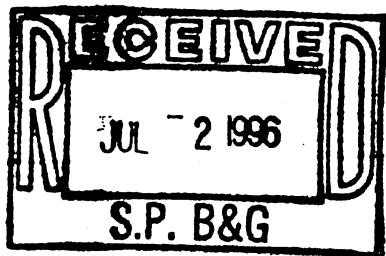
Enclosed please find my Motion to Withdraw for your files.

Sincerely,



Eileen A. Nevins, Esq.

EAN/lm
Enclosure



ATTORNEYS AT LAW
56 MIDDLE STREET
P. O. BOX 598
PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

CHARLES J. GRIFFIN, RETIRED

July 2, [REDACTED]

MAINE
PETER A. GLEICHMAN

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

Re: MacRae Cases

Dear Jim:

Pursuant to Judge Conboy's Order at the Structuring Conference this date, I hereby disclose that my witnesses at the hearing to be held on July 11, 15, and 17 regarding the statute of limitations issue will be [REDACTED]; Judy Paterson, ACSW; and Derek A. Stern, Ph.D.

Please disclose your witnesses as soon as possible.

Sincerely,
Peter A. Gleichman
Peter A. Gleichman

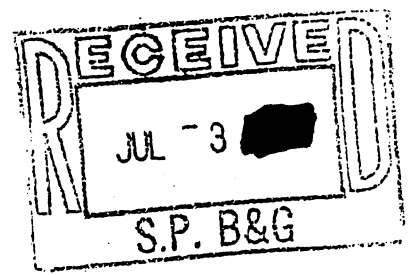
cc: Mark A. Abramson, Esquire
1819 Elm Street
Manchester, NH 03104

William W. Cleary, Esquire
206 Roxbury Street
Keene, NH 03431-3853

Robert Upton, II
P.O. Box 1109
Concord, NH 03302-1109

Peter W. Heed, Esquire
28 Middle Street
Keene, NH 03431

Gordon MacRae
c/o New Hampshire State Prison
P.O. Box 14
Concord, NH 03302-0014



TEL : 850007111

DATE/TIME	06/27 15:00
FAX NO./NAME	4331197
DURATION	00:01:21
RESULT	OK
CHECK READABILITY OF TRANSMITTED PAGE(S)	02
MODE	STANDARD

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Charge to: 6425-803

TELECOPIER TRANSMITTAL LETTER



1000 Elm Street
P.O. Box 3701
Manchester
New Hampshire
03105-3701
Fax 603-627-8121
603-668-0300

1 Harbour Place
Suite 325
Portsmouth
New Hampshire
03801-3856
Fax 603-433-3126
603-433-2111

Please deliver the accompanying pages to:

NAME Peter O. Reichman

COMPANY _____

FAX NUMBER 433-1197

FROM Jim Higgins

DATE OF TRANSMITTAL 6-27-96

TOTAL NUMBER OF PAGES (Including Cover Sheet) 2

Please call immediately if copy is not clear.

sally 627-8135

Comments

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GREEN
PROFESSIONAL
ASSOCIATION



June 27, 1996

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Peter A. Gleichman,, Esquire
Griffin, Swanson & Gleichman, P.A.
56 Middle Street
P. O. Box 598
Portsmouth, NH 03802-0598

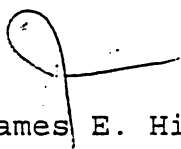
1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-2126
603-433-2111

Re: [REDACTED] v. MacRae, et al

Dear Peter:

I will be available by telephone starting at 9:00 a.m. on Tuesday, July 2nd, at 617-523-5300, for the structuring conference. I will be at the Law Offices of David Wardwell, Esquire at 92 State Street in Boston.

Very truly yours,


James E. Higgins

JEH/slb

GREEN
 BASS -
 GREEN
 PROFESSIONAL
 ASSOCIATION



June 26, [REDACTED]

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

1000 ELM STREET
 P.O. Box 3701
 MANCHESTER
 NEW HAMPSHIRE
 03105-3701
 FAX 603-627-8121
 603-668-0300

1 HARBOUR PLACE
 SUITE 325
 PORTSMOUTH
 NEW HAMPSHIRE
 03801-3856
 FAX 603-433-3126
 603-433-2111

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

Dear Ray:

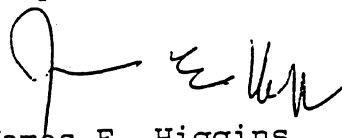
To update you on the status of the above-captioned matter, the Court has scheduled an evidentiary hearing for July 11, [REDACTED] to determine whether [REDACTED] action is barred by the statute of limitations. After initially denying the Diocese's Motion to Dismiss, we appealed to the New Hampshire Supreme Court which reversed the lower court's Order and remanded the case.

The issue to be determined at the evidentiary hearing is whether [REDACTED] suffered an injury in 1983 and 1984 which was sufficiently serious to apprise him that a possible violation of his rights had occurred. [REDACTED] contends that although he certainly received a serious injury, it was reasonable for a person in his circumstances not to comprehend that a possible violation of his rights had occurred.

After this hearing we will provide you with a further update once the Court reaches its decision after the conclusion of the evidentiary hearing.

As always, if you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'James E. Higgins', written in a cursive style.

James E. Higgins

JEH/slb

cc: Bishop Francis J. Christian

GRiffin, Swanson, & Gleichman, P.A.
ATTORNEYS AT LAW
56 MIDDLE STREET
P. O. BOX 598
PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

June 24, [REDACTED]

[REDACTED], Clerk
County Superior Court

Re: [REDACTED] v. MacRae, et als.
[REDACTED] Docket No. [REDACTED]

[REDACTED] v. MacRae, et als.
[REDACTED] Docket No. [REDACTED]

Dear [REDACTED]:

The Court has scheduled a one day evidentiary hearing before Judge Conboy on the statute of limitations issue in the above-referenced five consolidated cases. All four Plaintiffs' counsel (one case is not affected by the pending statute of limitations issue) expect to proceed on their cases on July 11. It is extremely remote that the evidentiary hearing in four cases, involving testimony from the Plaintiff and at least one expert in each case, will finish in one day.

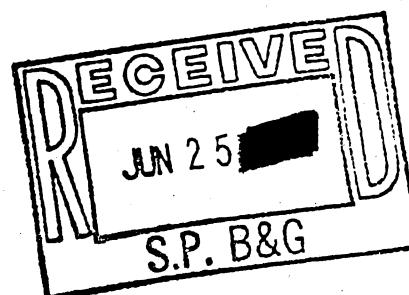
For planning purposes, I am requesting the immediate scheduling of a structuring conference before Judge Conboy to know whether we will proceed into July 12 and beyond. One of my expert witnesses is scheduled to be on vacation all that week, and guidance as to how Judge Conboy would expect to proceed is essential.

Please present this letter to Judge Conboy and contact me thereafter. Thank you.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

cc: Mark A. Abramson, Esquire
1819 Elm Street
Manchester, NH 03104



James E. Higgins, Esquire ✓
P.O. Box 3701
Manchester, NH 03105-3701

Robert Upton, II, Esquire
P.O. Box 1109
Concord, NH 03302-1109

William W. Cleary, Esquire
206 Roxbury Street
Keene, NH 03431-3858

Eileen A. Nevins, Esquire
36 Ashbrook Drive
Hampton, NH 03842

Peter W. Heed, Esquire
28 Middle Street
Keene, NH 03431

DALE T. SWANSON & PETER A. GLEICHMAN, P.A.
ATTORNEYS AT LAW
56 MIDDLE STREET
P. O. BOX 598
PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

CHARLES J. GRIFFIN, RETIRED

June 17, [REDACTED]

MAINE
PETER A. GLEICHMAN

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

Re: [REDACTED] v. MacRae, et als.

VIA FAX 627-8121 AND REGULAR MAIL

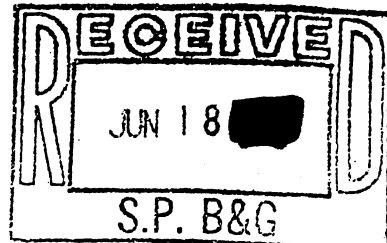
Dear Jim:

I am in receipt of your letter of June 12, [REDACTED]. At this time, the witnesses I know I intend to call to testify in conjunction with the July 11 hearing are [REDACTED]; Judith K. Paterson, ACSW; and Derek A. Stern, Ph.D. I am reserving the right to amend this list of witnesses.

Dr. Stern has advised me that he will be away on vacation on July 11; therefore, I am writing to you to request your agreement that he testify by deposition. Please advise before Wednesday, June 19 at 12:00 noon whether you will agree to Dr. Stern testifying by deposition due to his unavailability for the July 11 hearing. I am requesting this deadline so that I may have sufficient time to file a Motion with the Court and to allow for the scheduling of the deposition.

Also, I would like to know who will call as witnesses. Please advise at your earliest possible convenience.

Sincerely,
Peter A. Gleichman
Peter A. Gleichman



DALE T. SWANSON, ATTORNEY AT LAW
66 MIDDLE STREET
P.O. BOX 508
PORTSMOUTH, NEW HAMPSHIRE 03802-0508

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

June 17, [REDACTED]

MAINE
PETER A. GLEICHMAN

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

Re: [REDACTED] v. MacRae, et als.

VIA FAX 627-8121 AND REGULAR MAIL

Dear Jim:

I am in receipt of your letter of June 12, [REDACTED]. At this time, the witnesses I know I intend to call to testify in conjunction with the July 11 hearing are [REDACTED]; Judith K. Paterson, ACSW; and Derek A. Stern, Ph.D. I am reserving the right to amend this list of witnesses.

Dr. Stern has advised me that he will be away on vacation on July 11; therefore, I am writing to you to request your agreement that he testify by deposition. Please advise before Wednesday, June 19 at 12:00 noon whether you will agree to Dr. Stern testifying by deposition due to his unavailability for the July 11 hearing. I am requesting this deadline so that I may have sufficient time to file a Motion with the Court and to allow for the scheduling of the deposition.

Also, I would like to know who will call as witnesses. Please advise at your earliest possible convenience.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

Facsimile Fax Note	7671	Date	6/17/96	Time	10:51
To	Jim Higgins	From	Peter A. Gleichman		
Company		Co.			
Phone #	668-0300	Phone #	627-8121		
Fax #	627-8121	Fax #	433-1197		

SHEERMAN
STERNBERG
BASS +
GREEN

PROFESSIONAL
ASSOCIATION



ATTORNEYS AT LAW

June 12, [REDACTED]

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Peter A. Gleichman,, Esquire
Griffin, Swanson & Gleichman, P.A.
56 Middle Street
P. O. Box 598
Portsmouth, NH 03802-0598

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Re: [REDACTED] v. MacRae, et al.

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

Dear Peter:

In conjunction with the July 11th hearing, I do wish to know who you will call as witnesses. I assume the Plaintiff will testify, but kindly specify the others to be called. We may wish to take your experts' depositions before the date of the hearing.

Very truly yours,

James E. Higgins

JEH/slb

SP. OFFICE OF THE CLERK & BLEDHAM, P.A.

9803

ATTORNEYS AT LAW

56 MIDDLE STREET

P. O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

CHARLES J. GRIFFIN, RETIRED

June 4, [REDACTED]

MAINE
PETER A. GLEICHMAN

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

Re: [REDACTED] v. MacRae, et als.

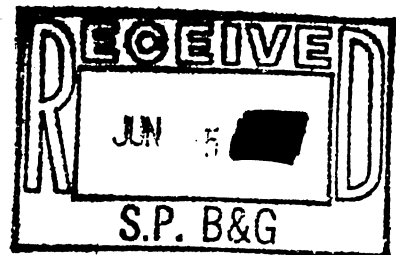
Dear Jim:

I am writing to inquire, in light of Judge Conboy's Order, whether the course that she sets for us navigates your client any closer towards a settlement or mediation with my client. Please contact me if that is the case.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

cc: [REDACTED]



PHILIP
FRANK
BASS -
GREEN
PROFESSIONAL
ASSOCIATION



April 9, [REDACTED]

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

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

Peter A. Gleichman,, Esquire
Griffin, Swanson & Gleichman, P.A.
56 Middle Street
P. O. Box 598
Portsmouth, NH 03802-0598

Re: [REDACTED] v. MacRae, et al

Dear Peter:

Thank you for your demand letter in the amount of \$175,000. I understand that your demand also includes counseling expenses in addition to the cash sum.

At this time I believe our evaluation of this case differs substantially from yours. At this point I do not believe that a counter-proposal is realistic nor do I think that mediation will advance the cause of settlement.

While circumstances may change, I believe it is best for all parties in this suit to await Judge Conboy's ruling and proceed upon whatever course she sets for us.

Very truly yours,

James E. Higgins

JEH/slb

J-EH-
ATTORNEYS
BASS -
GREEN
PROFESSIONAL
ASSOCIATION



March 27, [REDACTED]

PERSONAL AND CONFIDENTIAL

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

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

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Re: [REDACTED] v. Diocese

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

Dear Frank:

I enclose a copy of Peter Gleichman's demand letter to me. As discussed, although I assume he will come down a long way from this demand, it probably is not worthwhile to talk to him about settlement at this time. Do you agree?

Best regards,

James E. Higgins

JEH/slb
Enc.

DALE T. SWANSON & PETER A. GLEICHMAN, P.A.

9806

ATTORNEYS AT LAW

56 MIDDLE STREET

P. O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

CHARLES J. GRIFFIN, RETIRED

MAINE
PETER A. GLEICHMAN

March 27, [REDACTED]

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

VIA FAX TRANSMISSION - (603) 627-8121 - AND REGULAR MAIL

Re: [REDACTED] v. MacRae, et al

Dear Jim:

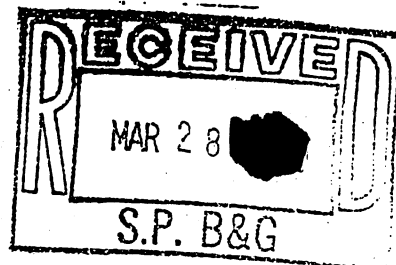
I am in receipt of your letter of March 19, [REDACTED]. Our demand is for \$175,000.00 as well as the Diocese paying for any counseling that [REDACTED] may require in the future. Please advise.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

PAG/mls

cc: [REDACTED] [REDACTED]



9807

GRIFFIN, SWANSON & GLEICHMAN
ATTORNEYS AT LAW
56 MIDDLE STREET
P. O. BOX 599
PORTSMOUTH, NEW HAMPSHIRE 03803-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN



FAX # (603) 433-1197

FACSIMILE TRANSMITTAL SHEET

TO: James E. Higgins, Esquire.
FAX #: (603) 627-8121
DATE: 3/27/96
TIME: _____
FROM: Peter A. Gleichman, Esquire
RE: _____
MESSAGE: _____

Number of pages (not including cover sheet) 1
Please call (603) 433-1830 if you have any problems or questions regarding this transmission.

Thank you.

NOTICE

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OFFICE OF CHARLES J. GRIFFIN, RETIRED

ATTORNEY AT LAW
56 MIDDLE STREET
P. O. BOX 558

FORTSMOUTH, NEW HAMPSHIRE 03802-0558

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

TEL. 603-433-1830
603-689-2200
FAX 603-433-1187

CHARLES J. GRIFFIN, RETIRED

MAINE
PETER A. GLEICHMAN

March 27, [REDACTED]

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

VIA FAX TRANSMISSION - (603) 627-8121 - AND REGULAR MAIL

Re: [REDACTED] v. MacRae, et al

Dear Jim:

I am in receipt of your letter of March 19, 1996. Our demand is for \$175,000.00 as well as the Diocese paying for any counseling that [REDACTED] may require in the future. Please advise.

Sincerely,
Peter A. Gleichman
Peter A. Gleichman

PAG/mls

cc: [REDACTED]

PROFESSIONAL
ASSOCIATION



ATTORNEYS AT LAW

1000 ELM STREET
P.O. BOX 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

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

March 19, [REDACTED]

Peter A. Gleichman,, Esquire
Griffin, Swanson & Gleichman, P.A.
56 Middle Street
P. O. Box 598
Portsmouth, NH 03802-0598

Re: [REDACTED] v. MacRae, et al

Dear Peter:

I have your inquiry concerning mediation of March 14th. Whether mediation is appropriate in this case is a function of whether your demand is realistic or not. What is your demand?

Very truly yours,

A handwritten signature in black ink, appearing to read "James E. Higgins", is written over the typed name.

James E. Higgins

JEH/slb

GALLAGHER BASSETT SERVICES, INC.

March 18, [REDACTED]

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

Re: [REDACTED] v. Diocese of Manchester

Dear Jim:

Kindly provide a current status report relative to captioned matter. In conjunction with this request, please find a Suit Status Report which I respectfully request that you employ in this undertaking.

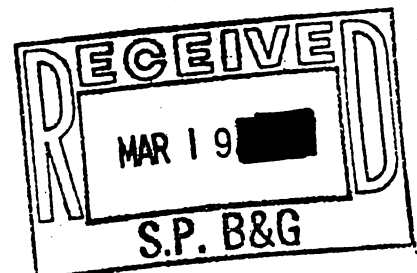
Your assistance in providing the requested update within 30-45 days will be most appreciated.

Thank you.

Sincerely,



Raymond L. Dumont
Branch Manager



ATTORNEYS AT LAW
56 MIDDLE STREET
P. O. BOX 598
PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

March 14, [REDACTED]

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

Re: [REDACTED] v. Gordon J. MacRae, The Roman Catholic
Bishop of Manchester, Inc. and Monsignor Gerard Boucher
[REDACTED] Docket No. [REDACTED]

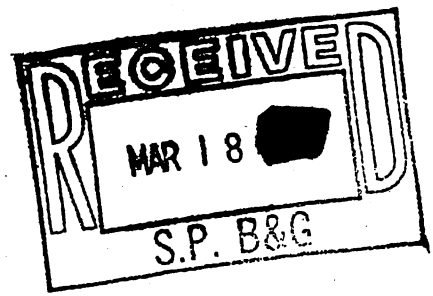
Dear Attorney Higgins:

I am writing to you to inquire whether your client is willing to enter into mediation of the above-referenced matter. Please let me hear from you.

Sincerely,
Peter A. Gleichman
Peter A. Gleichman

PAG/mls

cc: [REDACTED]



GREEN

PROFESSIONAL
ASSOCIATION



March 11, [redacted]

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

[redacted] Clerk
[redacted] County Superior Court
[redacted]

Re: [redacted] v. Roman Catholic Bishop
of Manchester, Gordon MacRae, Father John
Doe I and Father John Doe II -- [redacted]
[redacted] case

Re: [redacted] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [redacted]
[redacted] County case

Dear [redacted]

Enclosed for filing with the Court is
Defendants' The Roman Catholic Bishop of Manchester
and Father Boucher's Memorandum of Law in support of
Motion to Dismiss.

Very truly yours,

Robert R. Lucic

RRL/slb
Enc.
cc: Mark A. Abramson, Esquire
Peter Gleichman, Esquire
Eileen Nevins, Esquire
Peter W. Heed, Esquire
Robert Upton, II, Esquire
Kevin A. Silverstein, Esquire

UNITED STATES
ATTORNEY AT LAW
Unit 3-2 One Park Avenue
Hampton, New Hampshire 03842

Phone: (800) 926-0564
(603) 926-1366

Fax: (603) 926-1368
Licensed in Massachusetts Only

March 8, [REDACTED]

Robert R. Lucic, Esq.
SHEEHAN LAW FIRM
1000 Elm St.
P.O. Box 3701
Manchester, NH 03105-3701

Re: [REDACTED] v. Gordon J. MacRae, The Roman Catholic Bishop of
Manchester and Monsignor Gerard Boucher - [REDACTED] ([REDACTED] County
Case)

Dear Attorney Lucic:

Enclosed please find Defendant Gordon MacRae's Objection to Plaintiff's Second Motion to Amend His Writ of Summons for your records.

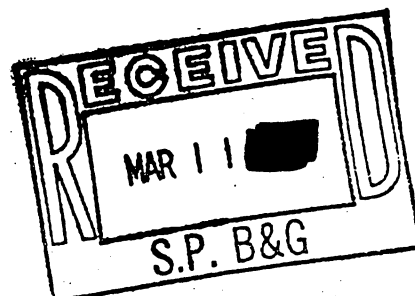
Thank you for your attention in this matter.

Sincerely,



Eileen A. Nevins, Esq.

EAN/lm
Enclosure



STATE -
PROFES
BASS -
GREEN
PROFESSIONAL
ASSOCIATION



March 4, [REDACTED]

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

[REDACTED] Clerk
[REDACTED] County Superior Court
[REDACTED]

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Re: [REDACTED] v. Roman Catholic Bishop
of Manchester, Gordon MacRae, Father John
Doe I and Father John Doe II -- [REDACTED]
[REDACTED] case

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [REDACTED]
[REDACTED] County case

Dear Mr. [REDACTED]:

Enclosed for filing with the Court is
Defendants' The Roman Catholic Bishop of Manchester
and Father Boucher's Objection to Plaintiff
[REDACTED] Second Motion to Amend.

Very truly yours,

Robert R. Lucic

RRL/slb
Enc.

- cc: Mark A. Abramson, Esquire
- Peter Gleichman, Esquire
- Eileen Nevins, Esquire
- Peter W. Heed, Esquire
- Robert Upton, II, Esquire
- Kevin A. Silverstein, Esquire

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

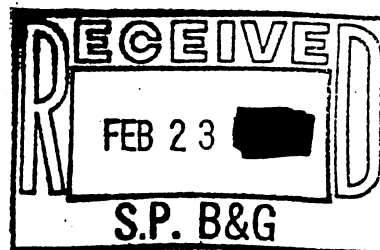
CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

February 22, [REDACTED]

[REDACTED] Clerk
County Superior Court



Re: [REDACTED]
Vs: Roman Catholic Bishop of Manchester, et als
[REDACTED] Docket #: [REDACTED]

Re: [REDACTED]
Vs: Gordon S. MacRae, et als
[REDACTED] County Docket #: [REDACTED]

Dear [REDACTED]:

You will find enclosed for filing with the Court Plaintiff
[REDACTED] Second Motion to Amend Writ of Summons,
copies of which have been forwarded by mail this date to opposing
counsel of record.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

PAG:jes
enclosure: as stated

cc: George P. Dickson, Esquire (w\enclosure)
394 Elm Street
Box 1
Milford, NH 03055

John M. Safford, Clerk
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- cc: Mark Abramson, Esquire (w\enclosure)
1819 Elm Street
Manchester, NH 03104
- cc: James E. Higgins, Esquire (w\enclosure)
SHEEHAN LAW FIRM
P.O. Box 3701
Manchester, NH 03105-3701
- cc: Eileen A. Nevins, Esquire (w\enclosure)
36 Ashbrook Drive
Hampton, NH 03842
- cc: Robert Upton, III, Esquire (w\enclosure)
P.O. Box 1090
Concord, NH 03302-1090
- cc: Peter W. Heed, Esquire (w\enclosure)
28 Middle Street
Keene, NH 03431
- cc: Kevin A. Silverstein, Esquire (w\enclosure)
36 Batchelder Road
Raymond, NH 03077
- cc: [REDACTED] (w\enclosure)