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8  
9 Attorneys for Defendants Appearing Specially  
CARDINAL NORBERTO RIVERA AND THE  
DIOCESE OF TEHUACAN

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 COUNTY OF LOS ANGELES, CENTRAL DISTRICT  
12

13 JOAQUIN AGUILAR MENDEZ,  
14 Plaintiff,  
15 v.

Case No. BC358718

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

16 CARDINAL ROGER MAHONY, THE  
ROMAN CATHOLIC ARCHBISHOP OF LOS  
17 ANGELES, A CORPORATION SOLE,  
CARDINAL NORBERTO RIVERA, THE  
18 DIOCESE OF TEHUACAN, FATHER  
NICHOLAS AGUILAR DOES 1-100,  
19 Defendants.  
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21 PROPOUNDING PARTY: Plaintiff Joaquin Aguilar Mendez

22 RESPONDING PARTY: Defendant The Diocese of Tehuacan

23 SET NUMBER: One [Nos. 1 - 53]

24 Defendant the Diocese of Tehuacan (the "Diocese") hereby responds to Plaintiffs' First  
25 Set of Special Interrogatories (collectively, the "Interrogatories," individually, an "Interrogatory")  
26 as follows:

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EXHIBIT 5  
DATE 7-29-01 WITNESS D. Martinez  
DANA CHRISTENSEN, CSR 11257

THE DIOCESE OF TEHUACAN'S RESPONSES TO PLAINTIFF'S  
INTERROGATORIES; CASE NO. BC358718

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1 PRELIMINARY STATEMENT

2 The Diocese's responses to the Interrogatories are made solely for the purpose of this  
3 action. Each response is made subject to all objections as to competence, relevance, materiality,  
4 propriety, admissibility, privilege, privacy, proprietary information, trade secrets and the like,  
5 and any and all other objections on grounds that would require the exclusion of any response  
6 herein if such were offered in Court, all of which objections and grounds are reserved and may  
7 be interposed at anytime, including at the time of trial.

8 No incidental or implied admissions are intended in these responses. The Diocese's  
9 response to any Interrogatory should not be taken as an admission that the Diocese accepts or  
10 admits the existence of any fact(s) or any document(s) assumed by that Interrogatory or that such  
11 response constitutes admissible evidence. The Diocese's response to any such Interrogatory is  
12 not intended to be, and shall not be construed as, a waiver by the Diocese of any or all  
13 objection(s) to the Interrogatory.

14 The Diocese has not completed its (a) investigation of the facts relating to this case, (b)  
15 discovery in this action, or (c) preparation for trial. The following responses are based upon  
16 information known at this time and are given without prejudice to the Diocese's right to amend,  
17 supplement or revise these responses with any subsequently discovered information.

18 GENERAL OBJECTIONS

19 The Diocese makes and hereby incorporates by reference the following general  
20 objections, whether or not separately set forth, in response to each Interrogatory:

21 1. The Diocese objects to each Interrogatory to the extent that it seeks information  
22 protected by the attorney-client privilege, the work-product doctrine, a confidentiality agreement,  
23 or information that is otherwise privileged, protected or confidential pursuant to any applicable  
24 doctrine, statute or rule. Such responses as may hereafter be given shall not include any  
25 information protected by such privileges, doctrines, statutes or rules, and any inadvertent  
26 disclosure of such information shall not be deemed a waiver of any such privilege, protection or  
27 confidentiality.  
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1 **RESPONSE TO INTERROGATORY NO. 1:**

2 The Diocese incorporates by reference its Preliminary Statement and General Objections  
3 set forth above. The Diocese further objects to this Interrogatory because it is compound in  
4 contravention of Section 2030.060(f) of the California Code of Civil Procedure. Subject to and  
5 without waiving its objections, the Diocese responds as follows:

6 The following persons answered and/or consulted in answering the Interrogatories:  
7 Rodrigo Aguilar Martinez, Bishop of the Diocese of Tehuacan; and Counsel for the Diocese of  
8 Tehuacan.

9 **INTERROGATORY NO. 2:**

10 Has any person incardinated by The Diocese of Tehuacan ever been personally present in  
11 California, United States of America?

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

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

23 No current employees of the Diocese of Tehuacan are currently present in California on  
24 business for the Diocese. On information and belief, no current employees of the Diocese of  
25 Tehuacan are currently physically present in California for any purpose. On information and  
26 belief, Defendant Father Nicholas Aguilar ("Fr. Aguilar") was physically present in the State of  
27 California during 1987 and 1988, subsequent to his irrevocable resignation from the Diocese on  
28 January 27, 1987.

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1 **INTERROGATORY NO. 3:**

2 If a person incardinated by The Diocese of Tehuacan has been personally present in  
3 California, United States of America, please state the dates that the incardinated person has been  
4 personally present in California, United States of America.

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

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

16 No current employees of the Diocese of Tehuacan are currently present in California on  
17 business for the Diocese. On information and belief, no current employees of the Diocese of  
18 Tehuacan are currently physically present in California for any purpose. On information and  
19 belief, Fr. Aguilar was physically present in the State of California during 1987 and 1988.

20 **INTERROGATORY NO. 4:**

21 If a person incardinated by The Diocese of Tehuacan has been personally present in  
22 California, United States of America please state the location(s) where the incardinated person  
23 was personally present.

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

25 The Diocese incorporates by reference its Preliminary Statement and General Objections  
26 set forth above. The Diocese further objects to the term "personally present" as vague,  
27 ambiguous and misleading. The Diocese further objects to this Interrogatory because it is overly  
28 broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense

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

7 On information and belief, Fr. Aguilar was physically present in Los Angeles, California  
8 during 1987 and 1988, subsequent to his irrevocable resignation from the Diocese on January 27,  
9 1987. No current employees of the Diocese of Tehuacan are currently present in California on  
10 business for the Diocese. On information and belief, no current employees of the Diocese of  
11 Tehuacan are currently physically present in California for any purpose.

12 **INTERROGATORY NO. 5:**

13 If a person incardinated by The Diocese of Tehuacan has been personally present in  
14 California, United States of America please state the purpose which brought the incardinated  
15 person to California, United States of America.

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

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

27 On information and belief, Fr. Aguilar was physically present in the State of California  
28 during 1987 and 1988, subsequent to his irrevocable resignation from the Diocese on January 27,

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1 1987. On information and belief, Fr. Aguilar resigned from the Diocese and went to California  
2 for family and health reasons, as a result of a physical assault on Fr. Aguilar's person. No  
3 current employees of the Diocese of Tehuacan are currently present in California on business for  
4 the Diocese. On information and belief, no current employees of the Diocese of Tehuacan are  
5 currently physically present in California for any purpose.

6 **INTERROGATORY NO. 6:**

7 If a person incardinated by The Diocese of Tehuacan has been personally present in  
8 California, United States of America please state the name of the incardinated person.

9 **RESPONSE TO INTERROGATORY NO. 6:**

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

20 On information and belief, Fr. Aguilar was physically present in the State of California  
21 during 1987 and 1988, subsequent to his irrevocable resignation from the Diocese on January 27,  
22 1987. No current employees of the Diocese of Tehuacan are currently present in California on  
23 business for the Diocese. On information and belief, no current employees of the Diocese of  
24 Tehuacan are currently physically present in California for any purpose.

25 **INTERROGATORY NO. 7:**

26 If a person incardinated by The Diocese of Tehuacan has been personally present in  
27 California, United States of America please state the job title of the incardinated person.  
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1 **RESPONSE TO INTERROGATORY NO. 7:**

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

12 On information and belief, Fr. Aguilar was physically present in the State of California  
13 during 1987 and 1988, subsequent to his irrevocable resignation from the Diocese on January 27,  
14 1987. Prior to his resignation, Fr. Aguilar held the title of Presbyter of San Sebastian Martir  
15 parish in Cuacnopalan, Puebla, Mexico in the Diocese of Tehuacan. No current employees of  
16 the Diocese of Tehuacan are currently present in California on business for the Diocese. On  
17 information and belief, no current employees of the Diocese of Tehuacan are currently physically  
18 present in California for any purpose.

19 **INTERROGATORY NO. 8:**

20 If a person incardinated by The Diocese of Tehuacan has been personally present in  
21 California, United States of America please describe every document which evidence his trip(s)  
22 to California, including but not limited to itinerary(ies), travel documents, visa applications etc.

23 **RESPONSE TO INTERROGATORY NO. 8:**

24 The Diocese incorporates by reference its Preliminary Statement and General Objections  
25 set forth above. The Diocese further objects to the term "personally present" as vague,  
26 ambiguous and misleading. The Diocese further objects to this Interrogatory because it is overly  
27 broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense  
28 upon the Diocese. The Diocese further objects to this Interrogatory because it seeks information

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

6 No current employees of the Diocese of Tehuacan are currently present in California on  
7 business for the Diocese. On information and belief, no current employees of the Diocese of  
8 Tehuacan are currently physically present in California for any purpose. On information and  
9 belief, the follow documents evidence Fr. Aguilar's trip to California during 1987 and 1988:

10 (a) Letter of January 27, 1987 from Cardinal Rivera to Cardinal Roger Mahony  
11 indicating that, for reasons of family and health, Fr. Aguilar desired to work for one  
12 year in Los Angeles.

13 (b) Letter of March 12, 1987 from Fr. Aguilar to Cardinal Rivera requesting, among  
14 other things, that Cardinal Rivera correspond confidentially with Cardinal Mahony  
15 and Vicar Thomas Curry regarding the reasons why Fr. Aguilar sought work in Los  
16 Angeles.

17 (c) Confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony and  
18 Vicar Curry explaining that Fr. Aguilar's departure from the Diocese of Tehuacan  
19 stemmed from a physical assault on Fr. Aguilar and that there were unproven  
20 accusations of homosexuality against Fr. Aguilar.

21 (d) Letter of March 23, 1987 from Cardinal Rivera to Fr. Aguilar confirming that  
22 Cardinal Rivera had sent the confidential letter of March 23, 1987.

23 (e) Letter of December 20, 1987 from Fr. Aguilar to Cardinal Rivera requesting  
24 permission to work in the Los Angeles Archdiocese permanently.

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

28 (g) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los

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Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera knew of Fr. Aguilar's whereabouts, Cardinal Rivera urge Fr. Aguilar to return to California.

- (h) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting information as to Fr. Aguilar's relatives.
- (i) Confidential letter of March 17, 1988 from Cardinal Rivera to Cardinal Mahony stating that Cardinal Rivera was unaware of Fr. Aguilar's whereabouts, providing information as to Fr. Aguilar's relatives and employment history, and referring Cardinal Mahony to the confidential letter of March 23, 1987.
- (j) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that he had never received the confidential letter of March 23, 1987.
- (k) Letter of May 20, 2004 from Cardinal Mahony to Mario Espinosa Contreras, then Bishop of the Diocese, requesting a copy of the confidential letter of March 23, 1987.
- (l) Letter of June 11, 2004 from Bishop Espinosa Contreras to Cardinal Mahony enclosing a copy of the confidential letter of March 23, 1987 per the request of May 20, 2004.

**INTERROGATORY NO. 9:**

If a person incardinated by The Diocese of Tehuacan has been personally present in California, United States of America please identify each and every instrumentality of the Catholic Church with whom he had personal contact while in California, United States of America.

**RESPONSE TO INTERROGATORY NO. 9:**

The Diocese incorporates by reference its Preliminary Statement and General Objections set forth above. The Diocese further objects to the terms "personally present" and "instrumentality" as vague, ambiguous and misleading. The Diocese further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon the Diocese. The Diocese further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved

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1 in this action nor reasonably calculated to lead to the discovery of admissible evidence. The  
2 Diocese further objects to this Interrogatory to the extent it requires the Diocese to maintain its  
3 regularly-generated reports or documents in a manner different from its usual practice. Subject  
4 to and without waiving its objections, the Diocese responds as follows:

5 No current employees of the Diocese of Tehuacan are currently present in California on  
6 business for the Diocese. On information and belief, no current employees of the Diocese of  
7 Tehuacan are currently physically present in California for any purpose. On information and  
8 belief, Fr. Aguilar had personal contact with Vicar Thomas Curry of the Los Angeles  
9 Archdiocese while in California in 1987 and 1988.

10 **INTERROGATORY NO. 10:**

11 If a person incardinated by The Diocese of Tehuacan has been personally present in  
12 California, United States of America please identify each and every instrumentality of the  
13 Catholic Church with whom he had personal contact while in California, United States of  
14 America.

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

16 The Diocese incorporates by reference its Preliminary Statement and General Objections  
17 set forth above. The Diocese further objects to the terms "personally present" and  
18 "instrumentality" as vague, ambiguous and misleading. The Diocese further objects to this  
19 Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an  
20 unreasonable burden and expense upon the Diocese. The Diocese further objects to this  
21 Interrogatory because it seeks information that is neither relevant to the subject matter involved  
22 in this action nor reasonably calculated to lead to the discovery of admissible evidence. The  
23 Diocese further objects to this Interrogatory to the extent it requires the Diocese to maintain its  
24 regularly-generated reports or documents in a manner different from its usual practice. The  
25 Diocese further objects to this Request because it is harassing, burdensome and duplicative of  
26 other Requests (e.g., Request No. 9). Subject to and without waiving its objections, the Diocese  
27 responds as follows:

28 No current employees of the Diocese of Tehuacan are currently present in California on

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1 business for the Diocese. On information and belief, no current employees of the Diocese of  
2 Tehuacan are currently physically present in California for any purpose. On information and  
3 belief, Fr. Aguilar had personal contact with Vicar Thomas Curry of the Los Angeles  
4 Archdiocese while in California in 1987 and 1988.

5 **INTERROGATORY NO. 11:**

6 If a person incardinated by The Diocese of Tehuacan has been personally present in  
7 California, United States of America please describe each and every Activity associated with any  
8 instrumentality of the Catholic Church in which the incardinated member participated while in  
9 California, United States of America.

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

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

21 No current employees of the Diocese of Tehuacan are currently present in California on  
22 business for the Diocese. On information and belief, no current employees of the Diocese of  
23 Tehuacan are currently physically present in California for any purpose. The Diocese is not  
24 aware of any specific functions or activities of the Los Angeles Archdiocese in which Fr. Aguilar  
25 participated while in California in 1987 and 1988.

26 **INTERROGATORY NO. 12:**

27 Is The Diocese of Tehuacan aware that Nicholas Aguilar became associated with the  
28 Roman Catholic Archbishop of Los Angeles, A Corporation Sole?

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

2 The Diocese incorporates by reference its Preliminary Statement and General Objections  
3 set forth above. The Diocese further objects to the phrase "became associated with" as vague,  
4 ambiguous and misleading. Subject to and without waiving its objections, the Diocese responds  
5 as follows:

6 No current employee of the Diocese has personal knowledge of any supposed association  
7 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese  
8 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los  
9 Angeles County on September 19, 2006. On information and belief, Fr. Aguilar interacted with  
10 the Archdiocese of Los Angeles during 1987 and 1988. The Diocese is not aware whether Fr.  
11 Aguilar interacted with Cardinal Roger Mahony during that time.

12 **INTERROGATORY NO. 13:**

13 If The Diocese of Tehuacan is aware that Nicholas Aguilar became associated with the  
14 Roman Catholic Archbishop of Los Angeles, A Corporation Sole, please state when The Diocese  
15 of Tehuacan first became aware of the association.

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

17 The Diocese incorporates by reference its Preliminary Statement and General Objections  
18 set forth above. The Diocese further objects to the phrase "became associated with" as vague,  
19 ambiguous and misleading. Subject to and without waiving its objections, the Diocese responds  
20 as follows:

21 No current employee of the Diocese has personal knowledge of any supposed association  
22 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese  
23 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los  
24 Angeles County on September 19, 2006. On information and belief, the Diocese first became  
25 aware that Fr. Aguilar interacted with the Archdiocese of Los Angeles sometime between March  
26 12, 1987 – the date on which Cardinal Rivera, then Bishop of the Diocese, received a letter from  
27 Fr. Aguilar requesting that Cardinal Rivera correspond confidentially with Cardinal Mahony and  
28 Vicar Thomas Curry – and March 23, 1987 – the date on which Cardinal Rivera responded to Fr.

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1 Aguilar's March 12 letter and wrote confidentially to Cardinal Mahony and Vicar Curry.

2 **INTERROGATORY NO. 14:**

3 If The Diocese of Tehuacan is aware that Nicholas Aguilar became associated with the  
4 Roman Catholic Archbishop of Los Angeles, A Corporation Sole, please state how The Diocese  
5 of Tehuacan first became aware of the association.

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

7 The Diocese incorporates by reference its Preliminary Statement and General Objections  
8 set forth above. The Diocese further objects to the phrase "became associated with" as vague,  
9 ambiguous and misleading. Subject to and without waiving its objections, the Diocese responds  
10 as follows:

11 No current employee of the Diocese has personal knowledge of any supposed association  
12 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese  
13 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los  
14 Angeles County on September 19, 2006. On information and belief, the Diocese first became  
15 aware that Fr. Aguilar interacted with Vicar Thomas Curry of the Archdiocese of Los Angeles by  
16 virtue of the March 12, 1987 letter from Fr. Aguilar to Cardinal Rivera. The Diocese is not  
17 aware whether Fr. Aguilar interacted with Cardinal Roger Mahony during Fr. Aguilar's time in  
18 California or at any other time.

19 **INTERROGATORY NO. 15:**

20 If The Diocese of Tehuacan is aware that Nicholas Aguilar became associated with the  
21 Roman Catholic Archbishop of Los Angeles, A Corporation Sole, please identify the individual  
22 who first informed The Diocese of Tehuacan of the association.

23 **RESPONSE TO INTERROGATORY NO. 15:**

24 The Diocese incorporates by reference its Preliminary Statement and General Objections  
25 set forth above. The Diocese further objects to the phrase "became associated with" as vague,  
26 ambiguous and misleading. Subject to and without waiving its objections, the Diocese responds  
27 as follows:

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

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1 between Fr. Aguilar and the Roman Catholic Archbishop of Los Angeles, although the Diocese  
2 is aware of the Complaint filed by Plaintiff Joaquin Aguilar Mendez in the Superior Court of Los  
3 Angeles County on September 19, 2006. On information and belief, the Diocese first became  
4 aware that Fr. Aguilar interacted with Vicar Thomas Curry of the Archdiocese of Los Angeles by  
5 virtue of the March 12, 1987 letter from Fr. Aguilar to Cardinal Rivera. The Diocese is not  
6 aware whether Fr. Aguilar interacted with Cardinal Roger Mahony during Fr. Aguilar's time in  
7 California or at any other time.

8 **INTERROGATORY NO. 16:**

9 Has an officer, director, or managing agent of The Diocese of Tehuacan ever had a  
10 conversation(s) with an officer, director or managing agent of the Roman Catholic Archbishop of  
11 Los Angeles, A Corporation Sole, regarding Nicholas Aguilar?

12 **RESPONSE TO INTERROGATORY NO. 16:**

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

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

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1 **INTERROGATORY NO. 17:**

2 If an officer, director, or managing agent of The Diocese of Tehuacan ever have a  
3 conversation(s) with an officer, director or managing agent of the Roman Catholic Archbishop of  
4 Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please identify each officer,  
5 director, or managing agent with whom he had the conversation(s).

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

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

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

22 **INTERROGATORY NO. 18:**

23 If an officer, director, or managing agent of The Diocese of Tehuacan ever have a  
24 conversation(s) with an officer, director or managing agent of the Roman Catholic Archbishop of  
25 Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please describe what was  
26 discussed in the conversation(s).

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

28 The Diocese incorporates by reference its Preliminary Statement and General Objections

NO. 17-18

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

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

15 **INTERROGATORY NO. 19:**

16 Has an officer, director, or managing agent of The Diocese of Tehuacan ever had written  
17 communication with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole,  
18 regarding Nicholas Aguilar?

19 **RESPONSE TO INTERROGATORY NO. 19:**

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

1 Cardinal Rivera and Mario Espinosa Contreras, each a former Bishop of the Diocese,  
2 have had written communications with the Roman Catholic Archbishop of Los Angeles  
3 regarding Fr. Aguilar.

4 **INTERROGATORY NO. 20:**

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

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

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

18 The Diocese has had the following written communications with the Archdiocese of Los  
19 Angeles, on the following dates:

- 20 (a) Letter of January 27, 1987 from Cardinal Rivera to Cardinal Roger Mahony  
21 indicating that, for reasons of family and health, Fr. Aguilar desired to work for one  
22 year in Los Angeles.
- 23 (b) Confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony and  
24 Vicar Curry explaining that Fr. Aguilar's departure from the Diocese of Tehuacan  
25 stemmed from a physical assault on Fr. Aguilar and that there were unproven  
26 accusations of homosexuality against Fr. Aguilar.
- 27 (c) Letter of January 11, 1988 from Vicar Curry to Cardinal Rivera explaining that Fr.  
28 Aguilar had been accused of acting inappropriately towards children and that, as a

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result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.

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

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

(f) Confidential letter of March 17, 1988 from Cardinal Rivera to Cardinal Mahony stating that Cardinal Rivera was unaware of Fr. Aguilar's whereabouts, providing information as to Fr. Aguilar's relatives and employment history, and referring Cardinal Mahony to the confidential letter of March 23, 1987.

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

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

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

**INTERROGATORY NO. 21:**

If an officer, director, or managing agent of The Diocese of Tehuacan ever had written communication with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please identify to whom the written communication(s) were directed.

**RESPONSE TO INTERROGATORY NO. 21:**

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

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519

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

6 The Diocese has had the following written communications with the Archdiocese of Los  
7 Angeles, with the following persons:

- 8 (a) Letter of January 27, 1987 from Cardinal Rivera to Cardinal Roger Mahony  
9 indicating that, for reasons of family and health, Fr. Aguilar desired to work for one  
10 year in Los Angeles.
- 11 (b) Confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony and  
12 Vicar Curry explaining that Fr. Aguilar's departure from the Diocese of Tehuacan  
13 stemmed from a physical assault on Fr. Aguilar and that there were unproven  
14 accusations of homosexuality against Fr. Aguilar.
- 15 (c) Letter of January 11, 1988 from Vicar Curry to Cardinal Rivera explaining that Fr.  
16 Aguilar had been accused of acting inappropriately towards children and that, as a  
17 result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.
- 18 (d) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los  
19 Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera  
20 knew of Fr. Aguilar's whereabouts, Cardinal Rivera urge Fr. Aguilar to return to  
21 California.
- 22 (e) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting  
23 information as to Fr. Aguilar's relatives.
- 24 (f) Confidential letter of March 17, 1988 from Cardinal Rivera to Cardinal Mahony  
25 stating that Cardinal Rivera was unaware of Fr. Aguilar's whereabouts, providing  
26 information as to Fr. Aguilar's relatives and employment history, and referring  
27 Cardinal Mahony to the confidential letter of March 23, 1987.
- 28 (g) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that

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

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

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

**INTERROGATORY NO. 22:**

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

**RESPONSE TO INTERROGATORY NO. 22:**

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

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

**INTERROGATORY NO. 23:**

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

**RESPONSE TO INTERROGATORY NO. 23:**

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

CONFIDENTIAL

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

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

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

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

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

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

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

24 **INTERROGATORY NO. 24:**

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

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

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

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

- 13           (a) Letter of January 11, 1988 from Vicar Curry to Cardinal Rivera explaining that Fr.  
14           Aguilar had been accused of acting inappropriately towards children and that, as a  
15           result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.  
16           (b) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los  
17           Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera  
18           knew of Fr. Aguilar's whereabouts, Cardinal Rivera urge Fr. Aguilar to return to  
19           California.  
20           (c) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting  
21           information as to Fr. Aguilar's relatives.  
22           (d) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that  
23           he had never received the confidential letter of March 23, 1987 from Cardinal Rivera  
24           to Cardinal Mahony.  
25           (e) Letter of May 20, 2004 from Cardinal Mahony to Mario Espinosa Contreras, then  
26           Bishop of the Diocese, requesting a copy of the confidential letter of March 23, 1987  
27           from Cardinal Rivera to Cardinal Mahony.  
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1 **INTERROGATORY NO. 25:**

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

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

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

14 The Diocese has received written communications from Cardinal Mahony.

15 **INTERROGATORY NO. 26:**

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

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

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

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

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1 on the following dates:

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

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

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

10 **INTERROGATORY NO. 27:**

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

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

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

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

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

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

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to Cardinal Mahony.

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

**INTERROGATORY NO. 28:**

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

**RESPONSE TO INTERROGATORY NO. 28:**

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

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

**INTERROGATORY NO. 29:**

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

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

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

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

17 **INTERROGATORY NO. 30:**

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

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

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

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527

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

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

10 **INTERROGATORY NO. 31:**

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

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

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

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

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528

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

2 **INTERROGATORY NO. 32:**

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

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

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

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

23 **INTERROGATORY NO. 33:**

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

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

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

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

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

14 **INTERROGATORY NO. 34:**

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

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

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

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

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

6 **INTERROGATORY NO. 35:**

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

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

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

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

26 **INTERROGATORY NO. 36:**

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

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

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

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

7 **INTERROGATORY NO. 37:**

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

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

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

16 **INTERROGATORY NO. 38:**

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

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

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

26 **INTERROGATORY NO. 39:**

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

NO. 32

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

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

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

7 **INTERROGATORY NO. 40:**

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

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

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

16 **INTERROGATORY NO. 41:**

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

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

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

26 **INTERROGATORY NO. 42:**

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

NO. 39

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1 was discussed.

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

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

7 **INTERROGATORY NO. 43:**

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

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

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

16 **INTERROGATORY NO. 44:**

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

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

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

25 **INTERROGATORY NO. 45:**

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

NO ANSWER

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

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

6 **INTERROGATORY NO. 46:**

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

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

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

14 **INTERROGATORY NO. 47:**

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

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

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

22 **INTERROGATORY NO. 48:**

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

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

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

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

2 **INTERROGATORY NO. 49:**

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

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

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

10 **INTERROGATORY NO. 50:**

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

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

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

19 **INTERROGATORY NO. 51:**

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

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

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

27 **INTERROGATORY NO. 52:**

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

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

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

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

8 **INTERROGATORY NO. 53:**

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

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

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

17  
18 Dated: May 18, 2007

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

19  
20  
21  
22 By: 

Evan M. Wooten

23 Attorneys for Defendants Appearing Specially  
24 CARDINAL NORBERTO RIVERA AND THE  
25 DIOCESE OF TEHUACAN  
26  
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NO. 11111111

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DE : Fernández del Castillo y Asoc. NO. DE TEL : 5533 6700  
FROM : ObispedoYde Tehuacan FAX NO. : 012383831468

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

**VERIFICATION**

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

Dated: May 7th 2007

By: + Rodrigo Aguilar  
Bishop Rodrigo Aguilar Martínez

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1 **PROOF OF SERVICE**

2 I, Haewon Park, declare:

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

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

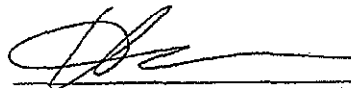
- 9  by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- 10  by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set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

16 *Please see attached service list.*

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

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

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

25 

26 Haewon Park

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