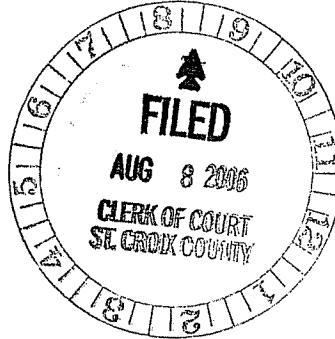


Thomas O'Connell, Sr., Janet O'Connell,  
Thomas O'Connell, Jr., Kathleen O'Connell,  
and Michael O'Connell,  
c/o Jeffrey Anderson  
332 Minnesota Street, Suite E1000  
St. Paul, Minnesota 55101,

Plaintiffs,



File No.: *06CV581*  
Case Code: 30704

**COMPLAINT**

vs.

United States Catholic Conference of Bishops,  
3211 4<sup>th</sup> Street NE, Washington, DC 20017-1194;  
Bishop Raphael M. Fliss, Diocese of Superior,  
1204 Hughitt Ave., Superior, WI 54880;  
Bishop Howard J. Hubbard, Diocese of Albany,  
40 N. Main Avenue, Albany, NY 12203;  
Bishop Ronald P. Herzog, Diocese of Alexandria,  
4400 Coliseum Blvd., P.O. Box 7417, Alexandria, LA 71306;  
Bishop Edward P. Cullen, Diocese of Allentown,  
4029 W. Tilghman St., Allentown, PA 18104;  
Bishop Joseph V. Adamec, Diocese of Altoona-Johnstown,  
126 Logan Blvd., Hollidaysburg, PA 16648;  
Bishop John W. Yanta, Diocese of Amarillo,  
1800 N. Spring St., P.O. Box 5644, Amarillo, TX 79117-5644;  
Archbishop Roger L. Schwietz, Archdiocese of Anchorage,  
225 Cordova St., Anchorage, AK 99501;  
Bishop Paul S. Loverde, Diocese of Arlington,  
200 N. Glebe Rd., Ste 914, Arlington, VA 22203;  
Archbishop Wilton D. Gregory, Archdiocese of Atlanta,  
680 W. Peachtree St., NW, Atlanta, GA 30308;  
Bishop Gregory M. Aymond, Diocese of Austin  
1600 N. Congress Avenue, P.O. Box 13327, Austin, TX 78711;  
Bishop Robert Francis Vasa, Diocese of Baker,  
P.O. Box 5999, Bend, OR 97708;  
Archbishop William Cardinal Keeler, Archdiocese of Baltimore,  
320 Cathedral St., Baltimore, MD 21201;  
Bishop Robert William Muench, Diocese of Baton Rouge,  
Catholic Life Center, 1800 S. Acadian Thruway,  
P.O. Box 2028, Baton Rouge, LA 70821-2028;

ST. CROIX CO. CASE NO.  
FILED BY L. MEYER  
ASSIGNED TO E.F. YLACK  
*Edward F. Ylack*

Bishop Curtis John Gullory, Diocese of Beaumont,  
703 Archie Center St., Beaumont, TX 77701;  
Bishop Edward K. Braxton, Diocese of Belleville,  
222 S. Third St., Belleville, IL 62220-1985;  
Bishop Thomas J. Rodi, Diocese of Biloxi,  
1790 Popp's Ferry Rd., P.O. Box 1189, Biloxi, MS 39533;  
Bishop David E. Foley, Diocese of Birmingham,  
P.O. Box 12047, Birmingham, AL 35202-2047;  
Bishop Paul A. Zipfel, Diocese of Bismarck,  
420 Raymond St., Box 1575, Bismarck, ND 58502-1575;  
Bishop Michael P. Driscoli, Diocese of Boise,  
303 Federal Way, Boise, ID 83705-5925;  
Archbishop Sean Patrick Cardinal O'Malley, Archdiocese of Boston,  
2121 Commonwealth Avenue, Boston, MA 02135-3193;  
Bishop William E. Lori, Diocese of Bridgeport,  
238 Jewett Ave., Bridgeport, CT 06606-2892;  
Bishop Nicholas A. DiMarzio, Diocese of Brooklyn,  
75 Greene Avenue, P.O. Box C, Brooklyn, NY 11202;  
Bishop Raymundo J. Pena, Diocese of Brownsville,  
1910 University Blvd., P.O. Box 2279, Brownsville, TX 78522-2279;  
Bishop Edward U. Kmiec, Diocese of Buffalo,  
795 Main St., Buffalo, NY 14203;  
Bishop Salvatore R. Matano, Diocese of Burlington,  
North Avenue, P.O. Box 489, Burlington, VT 05402-0489;  
Bishop Joseph A. Galante, Diocese of Camden,  
631 Market St., P.O. Box 708, Camden, NJ 08101;  
Bishop Robert J. Baker, Diocese of Charleston,  
119 Broad St., P.O. Box 818, Charleston, SC 29402;  
Bishop Peter J. Jurgis, Diocese of Charlotte,  
P.O. Box 36776, Charlotte, NC 28236;  
Bishop David Laurin Ricken, Diocese of Cheyenne,  
2121 Capitol Ave., P.O. Box 1468, Cheyenne, WY 82003-1468;  
Archbishop Francis Cardinal George, Archdiocese of Chicago,  
P.O. Box 1979, Chicago, IL 60690;  
Archbishop Daniel E. Pilarczyk, Archdiocese of Cincinnati,  
100 E. Eighth St., Cincinnati, OH 45202-2129;  
Bishop Richard Gerard Lennon, Diocese of Cleveland,  
1027 Superior Ave., Cleveland, OH 44114;  
Bishop Michael J. Sheridan, Diocese of Colorado Springs,  
228 N. Cascade Ave., Colorado Springs, CO 80903-1498;  
Bishop Frederick F. Campbell, Diocese of Columbus,  
198 E. Broad St., Columbus, OH 43215;

Bishop Edmond Carmody, Diocese of Corpus Christi,  
620 Lipan St., P.O. Box 2620, Corpus Christi, TX 78403-2620;  
Bishop Roger J. Foys, Diocese of Covington,  
P.O. Box 15550, Covington, KY 41015-0550;  
Bishop Victor H. Balke, Diocese of Crookston,  
1200 Memorial Dr., P.O. Box 610, Crookston, MN 56716;  
Bishop Charles V. Grahmann, Diocese of Dallas,  
3725 Blackburn, P.O. Box 190507, Dallas, TX 75219;  
Bishop William E. Franklin, Diocese of Davenport,  
2706 N. Gaines St., Davenport, IA 52804-1998;  
Archbishop Charles J. Chaput, Archdiocese of Denver,  
1300 S. Steele St., Denver, CO 80210;  
Bishop Joseph L. Charron, Diocese of Des Moines,  
601 Grand Avenue, Des Moines, IA 50309;  
Archbishop Adam Cardinal Maida, Archdiocese of Detroit,  
1234 Washington Blvd., Detroit, MI 48226;  
Bishop Ronald L. Gilmore, Diocese of Dodge City,  
910 Central Avenue, P.O. Box 137, Dodge City, KS 67801-0137;  
Archbishop Jerome Hanus, Archdiocese of Dubuque,  
P.O. Box 479, Dubuque, IA 52004-0479;  
Bishop Dennis M. Schnurr, Diocese of Duluth,  
2830 E. Fourth St., Duluth, MN 55812;  
Bishop Armando X. Ochoa, Diocese of El Paso,  
499 St. Matthews St., El Paso, TX 79907;  
Bishop Donald W. Trautman, Diocese of Erie,  
303 Federal Way, Boise, ID 83705-5925;  
Bishop Gerald Andrew Gettelfinger, Diocese of Evansville,  
4200 Kentucky Ave., P.O. Box 4169, Evansville, IN 47724-0169;  
Bishop Donald J. Kettler, Diocese of Fairbanks,  
1316 Peger Rd., Fairbanks, AK 99709;  
Bishop George W. Coleman, Diocese of Fall River,  
P.O. Box 2577, Fall River, MA 02722;  
Bishop Samuel J. Aquila, Diocese of Fargo,  
5201 Bishops Blvd., Ste. A, Fargo, ND 58104-7605;  
Bishop John M. D'Arcy, Diocese of Fort Wayne-South Bend,  
1103 S. Calhoun St., P.O. Box 390, Fort Wayne, IN 46801;  
Bishop Kevin W. Vann, Diocese of Fort Worth,  
800 West Loop 820 S., Fort Worth, TX 76108;  
Bishop John T. Steinbock, Diocese of Fresno,  
1550 N. Fresno St., Fresno, CA 93703-3788;  
Bishop Donald E. Pelotte, Diocese of Gallup,  
711 S. Puerco Dr., P.O. Box 1338, Gallup, NM 87305;

Archbishop Daniel N. DiNardo, Archdiocese of Galveston-Houston,  
P.O. Box 907, Houston, TX 77001-0907;  
Bishop Dale J. Melczek, Diocese of Gary,  
9292 Broadway, Merrillville, IN 46410;  
Bishop Patrick R. Cooney, Diocese of Gaylord,  
611 W. North St., Gaylord, MI 49735-8349;  
Bishop William J. Dendinger, Diocese of Grand Island,  
2708 Old Fair Rd., P.O. Box 996, Grand Island, NE 68802;  
Bishop Walter A. Hurley, Diocese of Grand Rapids,  
660 Burton St., SE, Grand Rapids, MI 49507;  
Bishop Anthony M. Milone, Diocese of Great Falls-Billings,  
121 23<sup>rd</sup> St. S., Great Falls, MT 59401-3939;  
Bishop David A. Zubik, Diocese of Green Bay,  
1910 S. Webster Ave., P.O. Box 23825, Green Bay, WI 54305-3825;  
Bishop Lawrence E. Brandt, Diocese of Greensburg,  
723 E. Pittsburgh St., Greensburg, PA 15601;  
Bishop Kevin C. Rhoades, Diocese of Harrisburg,  
P.O. Box 2153, Harrisburg, PA 17105-2153;  
Bishop Henry J. Mansell, Diocese of Hartford,  
134 Farmington Ave., Hartford, CT 06105-3784;  
Bishop George Leo Thomas, Diocese of Helena,  
515 N. Ewing, P.O. Box 1729, Helena, MT 59624-1729;  
Bishop Clarence R. Silva, Diocese of Honolulu,  
1184 Bishop St., Honolulu, HI 96813;  
Bishop Sam G. Jacobs, Diocese of Houma-Thibodaux,  
P.O. Box 505, Schriever, LA 70395;  
Archbishop Daniel Mark Buechlein, Archdiocese of Indianapolis,  
1400 N. Meridian St., P.O. Box 1410, Indianapolis, IN 46206;  
Bishop Joseph N. Latino, Diocese of Jackson,  
237 E. Amite St., P.O. Box 2248, Jackson, MS 39225-2248;  
Bishop John Raymond Gaydos, Diocese of Jefferson City,  
2207 E. Main Street, Jefferson City, MO 65110-4900;  
Bishop Joseph J. Imesch, Diocese of Joliet in Illinois,  
425 Summit St., Joliet, IL 60435;  
Bishop Michael W. Warfel, Diocese of Juneau,  
415 Sixth St., #300, Juneau, AK 99801;  
Bishop James A. Murray, Diocese of Kalamazoo,  
215 N. Westnedge Ave., Kalamazoo, MI 49007-3760;  
Archbishop Joseph S. Naumann, Archdiocese of Kansas City in Kansas,  
12615 Parallel Pkwy., Kansas City, KS 66109;  
Bishop Robert W. Finn, Diocese of Kansas City-St. Joseph,  
P.O. Box 419037, Kansas City, MO 64141-6037;

Bishop Joseph E. Kurtz, Diocese of Knoxville,  
805 Northshore Dr., SW, P.O. Box 11127, Knoxville, TN 37939-1127;  
Bishop Jerome E. ListECKI, Diocese of La Crosse,  
3710 East Avenue S., P.O. Box 4004, La Crosse, WI 54602-4004;  
Bishop Michael Jarrell, Diocese of Lafayette,  
1408 Carmel Dr., Lafayette, LA 70501;  
Bishop William L. Higi, Diocese of Lafayette in Indiana,  
P.O. Box 260, Lafayette, IN 47902-0260;  
Bishop Jude Speyrer, Diocese of Lake Charles,  
414 Iris St., P.O. Box 3223, Lake Charles, LA 70602;  
Bishop Carl F. Mengeling, Diocese of Lansing,  
300 W. Ottawa, Lansing, MI 48933;  
Bishop James A. Tamayo, Diocese of Laredo,  
1901 Corpus Christi, Laredo, TX 78043;  
Bishop Ricardo Ramirez, Diocese of Las Cruces,  
1280 med Park Dr., Las Cruces, NM 88005;  
Bishop Joseph A. Pepe, Diocese of Las Vegas,  
336 Cathedral Way, Las Vegas NV 89109;  
Bishop Robert W. Gainer, Diocese of Lexington,  
1310 W. Main St., Lexington, KY 40508-2048;  
Bishop Fabian W. Bruskewitz, Diocese of Lincoln,  
P.O. Box 80328, Lincoln, NE 68501-0328;  
Bishop James Peter Sartain, Diocese of Little Rock,  
2500 N. Tyler St., P.O. Box 7565, Little Rock, AR 72217;  
Archbishop Roger Cardinal Mahony, Archdiocese of Los Angeles,  
3424 Wilshire Blvd., Los Angeles, CA 90010-2202;  
Archbishop Thomas C. Kelly, Archdiocese of Louisville,  
212 E. College Street, P.O. Box 1073, Louisville, KY 40201;  
Bishop Placido Rodriguez, Diocese of Lubbock,  
P.O. Box 98700, Lubbock, TX 79499-8700;  
Bishop Robert C. Morlino, Diocese of Madison,  
702 S. High Point Road, P.O. Box 44983, Madison, WI 53744-4983;  
Bishop John B. McCormack, Diocese of Manchester,  
153 Ash St., P.O. Box 310, Manchester, NH 03105;  
Bishop Alexander K. Sample, Diocese of Marquette,  
117 W. Washington St., P.O. Box 1000, Marquette, WI 49855;  
Bishop J. Terry Steib, Diocese of Memphis,  
P.O. Box 341669, Memphis, TN 38184-1669;  
Bishop Paul G. Bootkoski, Diocese of Metuchen,  
P.O. Box 191, Metuchen, NJ 08840;  
Archbishop Thomas C. Kelly, Archdiocese of Miami,  
9401 Biscayne Blvd., Miami, FL 33138;

Archbishop Edwin F. O'Brien, Archdiocese for the Military Services, U.S.A.,  
P.O. Box 4469, Washington, DC 20017-0469;  
Archbishop Timothy Dolan, Archdiocese of Milwaukee,  
3501 South Lake Drive, P.O. Box 070912, Milwaukee, WI 53207;  
Archbishop Oscar H. Lipscomb, Archdiocese of Mobile,  
400 Government St., P.O. Box 1966, Mobile, AL 36633;  
Bishop Sylvester D. Ryan, Diocese of Monterey in California,  
631 Abrego St., Monterey, CA 93940;  
Bishop David R. Choby, Diocese of Nashville,  
2400 21<sup>st</sup> Ave. S., Nashville, TN 37212;  
Archbishop John J. Meyers, Archdiocese of Newark,  
171 Clifton Ave., P.O. Box 9500, Newark, NJ 07104-9500;  
Archbishop Alfred C. Hughes, Archdiocese of New Orleans,  
7887 Walmsley Ave., New Orleans, LA 70125-3496;  
Bishop John C. Nienstedt, Diocese of New Ulm,  
1400 6<sup>th</sup> Street North, New Ulm, MN 56073-2099;  
Archbishop Edward Cardinal Egan, Archdiocese of New York,  
1011 First Ave., New York, NY 10022;  
Bishop Michael R. Cote, Diocese of Norwich,  
201 Broadway, Norwich, CT 06360;  
Bishop Allen H. Vigneron, Diocese of Oakland,  
2900 Lakeshore Ave., Oakland, CA 94610-3697;  
Bishop Robert Joseph Cunningham, Diocese of Ogdensburg,  
P.O. Box 369, Ogdensburg, NY 13669;  
Archbishop Eusebius J. Beltran, Archdiocese of Oklahoma City,  
7501 Northwest Expwy., P.O. Box 32180, Oklahoma City, OK 73123;  
Archbishop Elden Francis Curtiss, Archdiocese of Omaha,  
100 N. 62 St., Omaha, NE 68132-2795;  
Bishop Tod David Brown, Diocese of Orange in California,  
2811 E. Villa Real Dr., P.O. Box 14195, Orange, CA 92863;  
Bishop Thomas G. Wenski, Diocese of Orlando,  
50 E. Robinson St., Orlando, FL 32801;  
Bishop John J. McGraith, Diocese of Owensboro,  
600 Locust St., Owensboro, KY 42301;  
Bishop Gerald M. Barbarito, Diocese of Palm Beach,  
9995 N. Military Tr., Palm Beach Gardens, FL 33410;  
Bishop Arthur J. Serratelli, Diocese of Paterson,  
777 Valley Rd., Clifton, NJ 07013;  
Bishop John H. Ricard, Diocese of Pensacola-Tennessee,  
11 North B St., Pensacola, FL 32501;  
Bishop David R. Jenky, Diocese of Peoria,  
607 NE Madison Ave., Peoria, IL 61603;

Archbishop Cardinal Justin Regali, Archdiocese of Philadelphia,  
222 N. 17<sup>th</sup> St., Philadelphia, PA 19103-1299;  
Bishop Thomas J. Olmsted, Diocese of Phoenix,  
400 E Monroe St., Phoenix, AZ 85004-2336;  
Bishop Donald W. Wuerl, Diocese of Pittsburgh,  
111 Blvd. Of the Allies, Pittsburgh, PA 15222-1618;  
Bishop Richard J. Malone, Diocese of Portland (In Maine),  
510 Ocean Ave., P.O. Box 11559, Portland, ME 04104-7559;  
Archbishop John G. Vlazny, Archdiocese of Portland in Oregon,  
2838 E. Burnside St., Portland, OR 97214-1895;  
Bishop Thomas J. Tobin, Diocese of Providence,  
One Cathedral Square, Providence, RI 02903-3695;  
Bishop Arthur N. Tafoya, Diocese of Pueblo,  
1001 Grand Ave., Pueblo, CO 81003;  
Bishop F. Joseph Grossman, Diocese of Raleigh,  
715 Nazareth St., Raleigh, NC 27606;  
Bishop Blase J. Cupich, Diocese of Rapid City,  
606 Cathedral Dr., Rapid City, SD 57701;  
Bishop Randolph R. Calvo, Diocese of Reno,  
290 S. Arlington Ave., Ste. 200, Reno, NV 89501;  
Bishop Francis X. DiLorenzo, Diocese of Richmond,  
811 Cathedral Pl., Richmond, VA 23220-4801;  
Bishop Matthew H. Clark, Diocese of Rochester,  
1150 Buffalo Rd., Rochester NY 14624-1890;  
Bishop Thomas G. Doran, Diocese of Rockford,  
555 Colman Center Dr., P.O. Box 7044, Rockford, IL 61125;  
Bishop William Francis Murphy, Diocese of Rockville Center,  
P.O. Box 9023, Rockville Centre, NY 11571-9023;  
Bishop William K. Weigand, Diocese of Sacramento,  
2110 Broadway, Sacramento, CA 95818-2541;  
Bishop Robert James Carlson, Diocese of Saginaw,  
5800 Weiss St., MI 48603-2799;  
Bishop Victor Benito Galeone, Diocese of St. Augustine,  
11625 Old St. Augustine Rd., Jacksonville, FL 32258;  
Bishop John F. Kinney, Diocese of St. Cloud,  
214 Third Ave. S, P.O. Box 1248, St. Cloud, MN 56302;  
Archbishop Raymond L. Burke, Archdiocese of St. Louis,  
4445 Lindell Blvd., St. Louis, MO 63108-2497;  
Archbishop Harry J. Flynn, Archdiocese of St. Paul and Minneapolis,  
226 Summit Ave., St. Paul, MN 55102;  
Bishop Robert N. Lynch, Diocese of St. Petersburg,  
P.O. Box 40200, St. Petersburg, FL 33743-0200;

Bishop Paul S. Coakley, Diocese of Salina,  
103 N. Ninth, P.O. Box 980, Salina, KS 67402-0980;  
Bishop of the Diocese of Salt Lake City, Diocese of Salt Lake City,  
27 C St., Salt Lake City, UT 84103-2397;  
Bishop Michael D. Pfeifer, Diocese of San Angelo,  
P.O. Box 1829, San Angelo, TX 76902;  
Archbishop Jose H. Gomez, Archdiocese of San Antonio,  
2718 W. Woodlawn Ave., P.O. Box 28410, San Antonio, TX 78241;  
Bishop Gerald R. Barnes, Diocese of San Bernardino,  
1201 E. Highland Ave., San Bernardino, CA 92404-4641;  
Bishop Robert H. Brom, Diocese of San Diego,  
P.O. Box 85728, San Diego, CA 92186-5728;  
Archbishop George H. Niederauer, Archdiocese of San Francisco,  
One Peter Yorke Way, San Francisco, CA 94109-6602;  
Bishop Patrick J. McGrath, Diocese of San Jose in California,  
900 Lafayette St., Ste. 301, Santa Clara, CA 95050-4966;  
Archbishop Michael J. Sheehan, Archdiocese of Santa Fe,  
4000 St. Joseph Pl., NW, Albuquerque, NM 87120;  
Bishop Daniel F. Walsh, Diocese of Santa Rosa in California,  
987 Airway Ct., Santa Rosa, CA 95403;  
Bishop J. Kevin Boland, Diocese of Savannah,  
601 E. Liberty St., Savannah, GA 31401-5196;  
Bishop Joseph F. Martino, Diocese of Scranton,  
300 Wyoming Ave., Scranton, PA 18503;  
Archbishop Alexander J. Brunett, Archdiocese of Seattle,  
910 Marion St., Seattle, WA 98104;  
Bishop William B. Friend, Diocese of Shreveport,  
3500 Fairfield Ave., Shreveport, LA 71104;  
Bishop R. Walker Nickless, Diocese of Sioux City,  
1821 Jackson St., P.O. Box 3379, Sioux City, IA 51102-3379;  
Bishop Paul V. Dudley, Diocese of Sioux Falls,  
523 N. Duluth Ave., Sioux Falls, SD 57104;  
Bishop R. William S. Skylstad, Diocese of Spokane,  
W. 1023 Riverside Ave., P.O. Box 1453, Spokane, WA 99210-1453;  
Bishop John J. Leibrecht, Diocese of Springfield-Cape Girardeau,  
601 S. Jefferson Ave., Springfield, MO 65806-3143;  
Bishop George J. Lucas, Diocese of Springfield in Illinois,  
1615 W. Washington St., P.O. Box 3187, Springfield, IL 62708-3187;  
Bishop Timothy A. McDonnell, Diocese of Springfield in Massachusetts,  
P.O. Box 1730, Springfield, MA 01102-1730;  
Bishop R. Daniel Conlon, Diocese of Steubenville,  
422 Washington St., P.O. Box 969, Steubenville, OH 43952-5969;



Bishop Stephen E. Blaire, Diocese of Stockton,  
1105 N. Lincoln St., Stockton, CA 95203;  
Bishop James M. Moynihan, Diocese of Syracuse,  
P.O. Box 511, Syracuse, NY 13201;  
Bishop Leonard P. Blair, Diocese of Toledo,  
P.O. Box 985, Toledo, OH 43697-0985;  
Bishop John M. Smith, Diocese of Trenton,  
701 Lawrenceville Rd., P.O. Box 5147, Trenton, NJ 08638;  
Bishop Gerald F. Kicanas, Diocese of Tucson,  
111 S. Church Ave., P.O. Box 31, Tucson, AZ 85702;  
Bishop Edward J. Slattery, Diocese of Tulsa,  
12300 91<sup>st</sup> St. S., Broken Arrow, OK 74012;  
Bishop Alvaro Corrada del Rio, Diocese of Tyler,  
1015 E.S.E. Loop 323, Tyler TX 75701-9663;  
Bishop John J. Nevins, Diocese of Venice,  
P.O. Box 2006, Venice, FL 34284;  
Bishop David E. Fellhauer, Diocese of Victoria in Texas,  
P.O. Box 4070, Victoria, TX 77903;  
Archbishop Theodore Cardinal McCarrick, Archdiocese of Washington,  
5001 Eastern Ave., P.O. Box 29260, Washington, D.C. 20017;  
Bishop Michael J. Bransfield, Diocese of Wheeling-Charleston,  
1300 Byron St., Wheeling, WV 26003;  
Bishop Michael Owen Jackels, Diocese of Wichita,  
424 N. Broadway, Wichita, KS 67202;  
Bishop Michael A. Saltarelli, Diocese of Wilmington,  
P.O. Box 2030, Wilmington, DE 19899-2030;  
Bishop Bernard J. Harrington, Diocese of Winona,  
55 W. Sanborn St., P.O. Box 588, Winona, MN 55987;  
Bishop Robert J. McManus, Diocese of Worcester,  
49 Elm St, Worcester, MA 01609;  
Bishop Carlos A. Sevilla, Diocese of Yakima,  
5301-A Tieton Dr., Yakima, WA 98908;  
Bishop Benedict C. Franzetta, Diocese of Youngstown,  
144 W. Wood St., Youngstown, OH 44503.

Defendants.

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## INTRODUCTION

1. This Complaint seeks injunctive relief against the Bishops and the USCCB. The Bishops and the USCCB have established a policy of harboring and protecting suspected child molesting agents, thereby endangering numerous children throughout the United States. The

Bishops and the USCCB have information about a number of suspected child molesting agents and former agents that it has never disclosed to law enforcement or the public at large, thereby causing harm to people such as Plaintiffs to be harmed. This injunction action seeks to have the Bishops and the USCCB turn over all documents regarding the molestation of children by its agents or former agents to law enforcement, and to release the names and locations of all agents or former agents accused of molesting children to law enforcement and to the public.

### **PARTIES**

2. Plaintiff Thomas O’Connell Sr. is an adult male resident of the state of Wisconsin.
3. Plaintiff Janet O’Connell is an adult male resident of the state of Wisconsin.
4. Plaintiff Thomas O’Connell Jr. is an adult male resident of the state of Wisconsin.
5. Plaintiff Kathleen O’Connell is an adult male resident of the state of Wisconsin.
6. Plaintiff Michael O’Connell is an adult male resident of the state of Wisconsin.
7. The United States Catholic Conference of Bishops (hereinafter “USCCB” consists of all Catholic Bishops from each diocese throughout the United States.
8. The USCCB controls extensive media operations that communicate with lay Catholics on an ongoing basis. The USCCB is supported, in part, by assessments from parishioners of each diocese. These assessments are used, in part, to fund various standing and ad hoc committees which study, advise, instruct, and issue policies and statements on the bishops' behalf to the Catholic faithful and to society in general on an exceptionally wide range of social and political issues. These organizations have the duty, the financial ability and structure to study, advise and instruct regarding prevention and treatment of child sexual abuse by Catholic clerics in a systematic and in-depth fashion.

9. Further, the USCCB meets annually to formulate policies and norms related to all matters of importance to the Catholic Bishops and the USCCB. For example, in 1985, the USCCB convened for their annual conference in Collegeville, Minnesota at St. John's where all bishops were in attendance. At that time, Father Thomas Doyle, Father Michael Peterson, and Ray Mouton prepared a comprehensive report that was given to the Catholic Bishops entitled "The Problem of Sexual Molestation by Roman Catholic Clergy/Meeting the Problem in a Comprehensive and Responsible Way." The report, among other things, provided strategies in prevention of child abuse and advocated against secrecy surrounding it. Upon information and belief, the USCCB at that time refused to act on these recommendations, ignored them and continued to deploy the practices complained of herein.

10. Defendant USCCB has agents and members, for example the bishops of each diocese, that transact business in every state.

11. The policies and practices of the USCCB described herein caused the USCCB to transact business in every state, including Wisconsin.

12. At all times material, the Bishop of the Diocese of Albany controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Albany is located at 40 N. Main Avenue, Albany, NY 12203. The current Bishop of the Diocese of Albany is Howard J. Hubbard. Bishop Howard J. Hubbard is sued in his individual capacity and in his capacity as Bishop of the Diocese of Albany.

13. At all times material, the Bishop of the Diocese of Alexandria controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Alexandria is located at 4400 Coliseum Blvd., P.O. Box 7417, Alexandria, LA 71306. The current Bishop of

the Diocese of Alexandria is Ronald P. Herzog. Bishop Ronald P. Herzog is sued in his individual capacity and in his capacity as Bishop of the Diocese of Alexandria.

14. At all times material, the Bishop of the Diocese of Allentown controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Allentown is located at 4029 W. Tilghman St., Allentown, PA 18104. The current Bishop of the Diocese of Allentown is Edward P. Cullen. Bishop Edward P. Cullen is sued in his individual capacity and in his capacity as Bishop of the Diocese of Allentown.

15. At all times material, the Bishop of the Diocese of Altoona-Johnstown controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Altoona-Johnstown is located at 126 Logan Blvd., Hollidaysburg, PA 16648. The current Bishop of the Diocese of Altoona-Johnstown is Joseph V Adamec. Bishop Joseph V. Adamec is sued in his individual capacity and in his capacity as Bishop of the Diocese of Altoona-Jamestown.

16. At all times material, the Bishop of the Diocese of Amarillo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Amarillo is located at 1800 N. Spring St., P.O. Box 5644. The current Bishop of the Diocese of Amarillo is John W. Yanta. Bishop John W. Yanta is sued in his individual capacity and in his capacity as Bishop of the Diocese of Amarillo.

17. At all times material, the Archbishop of the Archdiocese of Anchorage controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Anchorage is located at 225 Cordova St., Anchorage, AK 99501. The current Archbishop of the Archdiocese of Anchorage is Roger L. Schwietz. Archbishop Roger L. Schwietz is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Anchorage.

18. At all times material, the Bishop of the Diocese of Arlington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Arlington is located at 200 N. Glebe Rd., Ste 914, Arlington, VA 22203. The current Bishop of the Diocese of Arlington is Paul S. Loverde. Bishop Paul S. Loverde is sued in his individual capacity and in his capacity as Bishop of the Diocese of Arlington.

19. At all times material, the Archbishop of the Archdiocese of Atlanta controlled, operated and managed the affairs of the Diocese. The principal place of business of the Archdiocese of Atlanta is located at 680 W. Peachtree St., NW, Atlanta, GA 30308. The current Archbishop of the Archdiocese of Atlanta is Wilton D. Gregory. Archbishop Wilton D. Gregory is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Atlanta.

20. At all times material, the Bishop of the Diocese of Austin controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Austin is located at 1600 N. Congress Avenue, P.O. Box 13327, Austin, TX 78711. The current Bishop of the Diocese of Austin is Gregory M. Aymond. Bishop Gregory M. Aymond is sued in his individual capacity and in his capacity as Bishop of the Diocese of Austin.

21. At all times material, the Bishop of the Diocese of Baker controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Baker is located at P.O. Box 5999. The current Bishop of the Diocese of Baker is Robert Francis Vasa. Bishop Robert Francis Vasa is sued in his individual capacity and in his capacity as Bishop of the Diocese of Baker.

22. At all times material, the Archbishop of the Archdiocese of Baltimore controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the

Archdiocese of Baltimore is located at 320 Cathedral St., Baltimore, MD 21201. The current Archbishop of the Archdiocese of Baltimore is William Cardinal Keeler. Archbishop William Cardinal Keeler is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Baltimore.

23. At all times material, the Bishop of the Diocese of Baton Rouge controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Baton Rouge is located at Catholic Life Center, 1800 S. Acadian Thruway, P.O. Box 2028, Baton Rouge, LA 70821-2028. . The current Bishop of the Diocese of Baton Rouge is Robert William Muench. Bishop Robert William Muench is sued in his individual capacity and in his capacity as Bishop of the Diocese of Baton Rouge.

24. At all times material, the Bishop of the Diocese of Beaumont controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Beaumont is located at 703 Archie Center St., Beaumont, TX 77701. The current Bishop of the Diocese of Beaumont is Curtis John Gullory. Bishop Curtis John Gullory is sued in his individual capacity and in his capacity as Bishop of the Diocese of Beaumont.

25. At all times material, the Bishop of the Diocese of Belleville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Belleville is located at 222 S. Third St., Belleville, IL 62220-1985. The current Bishop of the Diocese of Belleville is Edward K. Braxton. Bishop Edward K. Braxton is sued in his individual capacity and in his capacity as Bishop of the Diocese of Belleville.

26. At all times material, the Bishop of the Diocese of Biloxi controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Biloxi is

located at 1790 Popps Ferry Rd., P.O. Box 1189, Biloxi, MS 39533. The current Bishop of the Diocese of Biloxi is Thomas J. Rodi. Bishop Thomas J. Rodi is sued in his individual capacity and in his capacity as Bishop of the Diocese of Biloxi.

27. At all times material, the Bishop of the Diocese of Birmingham controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Birmingham is located at P.O. Box 12047, Birmingham, AL 35202-2047. The current Bishop of the Diocese of Birmingham is David E. Foley . Bishop David E. Foley is sued in his individual capacity and in his capacity as Bishop of the Diocese of Birmingham.

28. At all times material, the Bishop of the Diocese of Bismarck controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Bismarck is located at 420 Raymond St., Box 1575, Bismarck, ND 58502-1575. The current Bishop of the Diocese of Bismarck is Paul A. Zipfel. Bishop Paul A. Zipfel is sued in his individual capacity and in his capacity as Bishop of the Diocese of Bismarck.

29. At all times material, the Bishop of the Diocese of Boise controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Boise is located at 303 Federal Way, Boise, ID 83705-5925. The current Bishop of the Diocese of Boise is Michael P. Driscoli. Bishop Michael P. Driscoli is sued in his individual capacity and in his capacity as Bishop of the Diocese of Boise.

30. At all times material, the Archbishop of the Archdiocese of Boston controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Boston is located at 2121 Commonwealth Avenue, Boston, MA 02135-3193. The current Archbishop of the Archdiocese of Boston is Sean Patrick Cardinal O'Malley. Archbishop

Sean Patrick Cardinal O'Malley is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Boston.

31. At all times material, the Bishop of the Diocese of Bridgeport controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Bridgeport is located at 238 Jewett Ave., Bridgeport, CT 06606-2892. The current Bishop of the Diocese of Bridgeport is William E. Lori. Bishop William E. Lori is sued in his individual capacity and in his capacity as Bishop of the Diocese of Bridgeport.

32. At all times material, the Bishop of the Diocese of Brooklyn controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Brooklyn is located at 75 Greene Avenue, P.O. Box C, Brooklyn, NY 11202. The current Bishop of the Diocese of Brooklyn is Nicholas A. DiMarzio. Bishop Nicholas A. DiMarzio is sued in his individual capacity and in his capacity as Bishop of the Diocese of Brooklyn.

33. At all times material, the Bishop of the Diocese of Brownsville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Brownsville is located at 1910 University Blvd., P.O. Box 2279, Brownsville, TX 78522-2279. The current Bishop of the Diocese of Brownsville is Michael P. Raymundo J. Pena. Bishop Raymundo J. Pena is sued in his individual capacity and in his capacity as Bishop of the Diocese of Brownsville.

34. At all times material, the Bishop of the Diocese of Buffalo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Buffalo is located at 795 Main St., Buffalo, NY 14203. The current Bishop of the Diocese of Buffalo is Edward U. Kmiec. Bishop Edward U. Kmiec is sued in his individual capacity and in his capacity as Bishop of the Diocese of Buffalo.



35. At all times material, the Bishop of the Diocese of Burlington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Burlington is located at 351 North Avenue, P.O. Box 489, Burlington, VT 05402-0489. The current Bishop of the Diocese of Burlington is Salvatore R. Matano. Bishop Salvatore R. Matano is sued in his individual capacity and in his capacity as Bishop of the Diocese of Burlington.

36. At all times material, the Bishop of the Diocese of Camden controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Camden is located at 631 Market St., P.O. Box 708, Camden, NJ 08101. The current Bishop of the Diocese of Camden is Joseph A. Galante. Bishop Joseph A. Galante is sued in his individual capacity and in his capacity as Bishop of the Diocese of Camden.

37. At all times material, the Bishop of the Diocese of Charleston controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Charleston is located at 119 Broad St., P.O. Box 818, Charleston, SC 29402. The current Bishop of the Diocese of Charleston is Robert J. Baker. Bishop Robert J. Baker is sued in his individual capacity and in his capacity as Bishop of the Diocese of Charleston.

38. At all times material, the Bishop of the Diocese of Charlotte controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Charlotte is located at P.O. Box 36776, Charlotte, NC 28236. The current Bishop of the Diocese of Charlotte is Peter J. Jurgis. Bishop Peter J. Jurgis is sued in his individual capacity and in his capacity as Bishop of the Diocese of Charlotte.

39. At all times material, the Bishop of the Diocese of Cheyenne controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Cheyenne is located at 2121 Capitol Ave., P.O. Box 1468, Cheyenne, WY 82003-1468. The current Bishop of

the Diocese of Cheyenne is David Laurin Ricken. Bishop David Laurin Ricken is sued in his individual capacity and in his capacity as Bishop of the Diocese of Cheyenne.

40. At all times material, the Archbishop of the Archdiocese of Chicago controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Chicago is located at P.O. Box 1979, Chicago, IL 60690. The current Archbishop of the Archdiocese of Chicago is Francis Cardinal George. Archbishop Francis Cardinal George is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Chicago.

41. At all times material, the Archbishop of the Archdiocese of Cincinnati controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Cincinnati is located at 100 E. Eighth St., Cincinnati, OH 45202-2129. The current Archbishop of the Archdiocese of Cincinnati is Daniel E. Pilarczyk. Archbishop Daniel E. Pilarczyk is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Cincinnati.

42. At all times material, the Bishop of the Diocese of Cleveland controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Cleveland is located at 1027 Superior Ave., Cleveland, OH 44114. The current Bishop of the Diocese of Cleveland is Richard Gerard Lennon. Bishop Richard Gerard Lennon is sued in his individual capacity and in his capacity as Bishop of the Diocese of Cleveland.

43. At all times material, the Bishop of the Diocese of Colorado Springs controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Colorado Springs is located at 228 N. Cascade Ave., Colorado Springs, CO 80903-1498. The current Bishop of the Diocese of Colorado Springs is Michael J. Sheridan. Bishop Michael J. Sheridan is sued in his individual capacity and in his capacity as Bishop of the Diocese of Colorado Springs.

44. At all times material, the Bishop of the Diocese of Columbus controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Columbus is located at 198 E. Broad St., Columbus, OH 43215. The current Bishop of the Diocese of Columbus is Frederick F. Campbell. Bishop Frederick F. Campbell is sued in his individual capacity and in his capacity as Bishop of the Diocese of Columbus.

45. At all times material, the Bishop of the Diocese of Corpus Christi controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Corpus Christi is located at 620 Lipan St., P.O. Box 2620, Corpus Christi, TX 78403-2620. The current Bishop of the Diocese of Corpus Christi is Edmond Carmody. Bishop Edmond Carmody is sued in his individual capacity and in his capacity as Bishop of the Diocese of Corpus Christi.

46. At all times material, the Bishop of the Diocese of Covington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Covington is located at P.O. Box 15550, Covington, KY 41015-0550 . The current Bishop of the Diocese of Covington is Roger J. Foys. Bishop Roger J. Foys is sued in his individual capacity and in his capacity as Bishop of the Diocese of Covington.

47. At all times material, the Bishop of the Diocese of Crookston controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Crookston is located at 1200 Memorial Dr., P.O. Box 610, Crookston, MN 56716. The current Bishop of the Diocese of Crookston is Victor H. Balke. Bishop Victor H. Balke is sued in his individual capacity and in his capacity as Bishop of the Diocese of Crookston.

48. At all times material, the Bishop of the Diocese of Dallas controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Dallas is located at 3725 Blackburn, P.O. Box 190507, Dallas, TX 75219. The current Bishop of the Diocese

of Dallas is Charles V. Grahmann. Bishop Charles V. Grahmann is sued in his individual capacity and in his capacity as Bishop of the Diocese of Dallas.

49. At all times material, the Bishop of the Diocese of Davenport controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Davenport is located at 2706 N. Gaines St., Davenport, IA 52804-1998. The current Bishop of the Diocese of Davenport is William E. Franklin. Bishop William E. Franklin is sued in his individual capacity and in his capacity as Bishop of the Diocese of Davenport.

50. At all times material, the Archbishop of the Archdiocese of Denver controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Denver is located at 1300 S. Steele St., Denver, CO 80210. The current Archbishop of the Archdiocese of Denver is Charles J. Chaput. Archbishop Charles J. Chaput is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Denver.

51. At all times material, the Bishop of the Diocese of Des Moines controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Des Moines is located at 601 Grand Avenue, Des Moines, IA 50309. The current Bishop of the Diocese of Des Moines is Joseph L. Charron. Bishop Joseph L. Charron is sued in his individual capacity and in his capacity as Bishop of the Diocese of Des Moines.

52. At all times material, the Archbishop of the Archdiocese of Detroit controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Detroit is located at 1234 Washington Blvd., Detroit, MI 48226. The current Archbishop of the Archdiocese of Detroit is Adam Cardinal Maida. Archbishop Adam Cardinal Maida is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Detroit.

53. At all times material, the Bishop of the Diocese of Dodge City controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Dodge City is located at 910 Central Avenue, P.O. Box 137, Dodge City, KS 67801-0137. The current Bishop of the Diocese of Dodge City is Ronald M. Gilmore. Bishop Ronald L. Gilmore is sued in his individual capacity and in his capacity as Bishop of the Diocese of Dodge City.

54. At all times material, the Archbishop of the Archdiocese of Dubuque controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Dubuque is located at P.O. Box 479, Dubuque, IA 52004-0479. The current Archbishop of the Archdiocese of Dubuque is Jerome Hanus. Archbishop Jerome Hanus is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Dubuque.

55. At all times material, the Bishop of the Diocese of Duluth controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Duluth is located at 2830 E. Fourth St., Duluth, MN 55812. The current Bishop of the Diocese of Duluth is Dennis M. Schnurr. Bishop Dennis M. Schnurr is sued in his individual capacity and in his capacity as Bishop of the Diocese of Duluth.

56. At all times material, the Bishop of the Diocese of El Paso controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of El Paso is located at 499 St. Matthews St., El Paso, TX 79907. The current Bishop of the Diocese of El Paso is Armando X. Ochoa. Bishop Armando X. Ochoa is sued in his individual capacity and in his capacity as Bishop of the Diocese of El Paso.

57. At all times material, the Bishop of the Diocese of Erie controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Erie is located at 303 Federal Way, Boise, ID 83705-5925. The current Bishop of the Diocese of Erie is Donald W.

Trautman. Bishop Donald W. Trautman is sued in his individual capacity and in his capacity as Bishop of the Diocese of Erie.

58. At all times material, the Bishop of the Diocese of Evansville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Evansville is located at 4200 Kentucky Ave., P.O. Box 4169, Evansville, IN 47724-0169. The current Bishop of the Diocese of Evansville is Gerald Andrew Gettelfinger. Bishop Gerald Andrew Gettelfinger is sued in his individual capacity and in his capacity as Bishop of the Diocese of Evansville.

59. At all times material, the Bishop of the Diocese of Fairbanks controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Fairbanks is located at 1316 Peger Rd., Fairbanks, AK 99709. The current Bishop of the Diocese of Fairbanks is Donald J Kettler. Bishop Donald J. Kettler is sued in his individual capacity and in his capacity as Bishop of the Diocese of Fairbanks.

60. At all times material, the Bishop of the Diocese of Fall River controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Fall River is located at P.O. Box 2577, Fall River, MA 02722. The current Bishop of the Diocese of Fall River is George W. Coleman. Bishop George W. Coleman is sued in his individual capacity and in his capacity as Bishop of the Diocese of Fall River.

61. At all times material, the Bishop of the Diocese of Fargo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Fargo is located at 5201 Bishops Blvd., Ste. A, Fargo, ND 58104-7605. The current Bishop of the Diocese of Fargo is Samuel J. Aquila. Bishop Samuel J. Aquila is sued in his individual capacity and in his capacity as Bishop of the Diocese of Fargo.

62. At all times material, the Bishop of the Diocese of Fort Wayne-South Bend

controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Fort Wayne-South Bend is located at 1103 S. Calhoun St., P.O. Box 390, Fort Wayne, IN 46801. The current Bishop of the Diocese of Fort Wayne-South Bend is John M. D'Arcy. Bishop John M. D'Arcy is sued in his individual capacity and in his capacity as Bishop of the Diocese of Fort Wayne-South Bend.

63. At all times material, the Bishop of the Diocese of Fort Worth controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Fort Worth is located at 800 West Loop 820 S., Fort Worth, TX 76108. The current Bishop of the Diocese of Fort Worth is Kevin W. Vann. Bishop Kevin W. Vann is sued in his individual capacity and in his capacity as Bishop of the Diocese of Fort Worth.

64. At all times material, the Bishop of the Diocese of Fresno controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Fresno is located at 1550 N. Fresno St., Fresno, CA 93703-3788. The current Bishop of the Diocese of Fresno is John T. Steinbock. Bishop John T. Steinbock is sued in his individual capacity and in his capacity as Bishop of the Diocese of Fresno.

65. At all times material, the Bishop of the Diocese of Gallup controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Gallup is located at 711 S. Puerco Dr., P.O. Box 1338, Gallup, NM 87305. The current Bishop of the Diocese of Gallup is Donald E. Pelotte. Bishop Donald E. Pelotte is sued in his individual capacity and in his capacity as Bishop of the Diocese of Gallup.

66. At all times material, the Archbishop of the Archdiocese of Galveston-Houston controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Galveston-Houston is located at P.O. Box 907, Houston, TX 77001-0907. The

current Archbishop of the Archdiocese of Galveston-Houston is Daniel N. DiNardo. Archbishop Daniel N. DiNardo is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Galveston-Houston.

67. At all times material, the Bishop of the Diocese of Gary controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Gary is located at 9292 Broadway, Merrillville, IN 46410. The current Bishop of the Diocese of Gary is Dale J. Melczek. Bishop Dale J. Melczek is sued in his individual capacity and in his capacity as Bishop of the Diocese of Gary.

68. At all times material, the Bishop of the Diocese of Gaylord controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Gaylord is located at 611 W. North St., Gaylord, MI 49735-8349. The current Bishop of the Diocese of Gaylord is Patrick R. Cooney. Bishop Patrick R. Cooney is sued in his individual capacity and in his capacity as Bishop of the Diocese of Gaylord.

69. At all times material, the Bishop of the Diocese of Grand Island controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Grand Island is located at 2708 Old Fair Rd., P.O. Box 996, Grand Island, NE 68802. The current Bishop of the Diocese of Grand Island is William J. Dendinger. Bishop William J. Dendinger is sued in his individual capacity and in his capacity as Bishop of the Diocese of Grand Island.

70. At all times material, the Bishop of the Diocese of Grand Rapids controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Grand Rapids is located at 660 Burton St., SE, Grand Rapids, MI 49507. The current Bishop of the Diocese of Grand Rapids is Walter A. Hurley. Bishop Walter A. Hurley is sued in his individual capacity and in his capacity as Bishop of the Diocese of Grand Rapids.



71. At all times material, the Bishop of the Diocese of Great Falls-Billings controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Great Falls-Billings is located at 121 23<sup>rd</sup> St. S., Great Falls, MT 59401-3939. The current Bishop of the Diocese of Great Falls-Billings is Anthony M. Milone. Bishop Anthony M. Milone is sued in his individual capacity and in his capacity as Bishop of the Diocese of Great Falls-Billings.

72. At all times material, the Bishop of the Diocese of Green Bay controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Green Bay is located at 1910 S. Webster Ave., P.O. Box 23825, Green Bay, WI 54305-3825. The current Bishop of the Diocese of Green Bay is David A. Zubik. Bishop David A. Zubik is sued in his individual capacity and in his capacity as Bishop of the Diocese of Green Bay.

73. At all times material, the Bishop of the Diocese of Greensburg controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Greensburg is located at 723 E. Pittsburgh St., Greensburg, PA 15601. The current Bishop of the Diocese of Greensburg is Lawrence E. Brandt. Bishop Lawrence E. Brandt is sued in his individual capacity and in his capacity as Bishop of the Diocese of Greensburg.

74. At all times material, the Bishop of the Diocese of Harrisburg controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Harrisburg is located at P.O. Box 2153, Harrisburg, PA 17105-2153. The current Bishop of the Diocese of Harrisburg is Kevin C. Rhoades. Bishop Kevin C. Rhoades is sued in his individual capacity and in his capacity as Bishop of the Diocese of Harrisburg.

75. At all times material, the Bishop of the Diocese of Hartford controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Hartford is located at 134 Farmington Ave., Hartford, CT 06105-3784. The current Bishop of the Diocese of

Hartford is Henry J. Mansell. Bishop Henry J. Mansell is sued in his individual capacity and in his capacity as Bishop of the Diocese of Hartford.

76. At all times material, the Bishop of the Diocese of Helena controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Helena is located at 515 N. Ewing, P.O. Box 1729, Helena, MT 59624-1729. The current Bishop of the Diocese of Helena is George Leo Thomas. Bishop George Leo Thomas is sued in his individual capacity and in his capacity as Bishop of the Diocese of Helena.

77. At all times material, the Bishop of the Diocese of Honolulu controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Honolulu is located at 1184 Bishop St., Honolulu, HI 96813. The current Bishop of the Diocese of Honolulu is Clarence R. Silva. Bishop Clarence R. Silva is sued in his individual capacity and in his capacity as Bishop of the Diocese of Honolulu.

78. At all times material, the Bishop of the Diocese of Houma-Thibodaux controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Houma-Thibodaux is located at P.O. Box 505, Schriever, LA 70395. The current Bishop of the Diocese of Houma-Thibodaux is Sam G. Jacobs. Bishop Sam G. Jacobs is sued in his individual capacity and in his capacity as Bishop of the Diocese of Houma-Thibodaux.

79. At all times material, the Archbishop of the Archdiocese of Indianapolis controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Indianapolis is located at 1400 N. Meridian St., P.O. Box 1410, Indianapolis, IN 46206. The current Archbishop of the Archdiocese of Indianapolis is Daniel Mark Buechlein. Archbishop Daniel Mark Buechlein is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Indianapolis.

80. At all times material, the Bishop of the Diocese of Jackson controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Jackson is located at 237 E. Amite St., P.O. Box 2248, Jackson, MS 39225-2248. The current Bishop of the Diocese of Jackson is Joseph N. Latino. Bishop Joseph N. Latino is sued in his individual capacity and in his capacity as Bishop of the Diocese of Jackson.

81. At all times material, the Bishop of the Diocese of Jefferson City controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Jefferson City is located at 2207 E. Main Street, Jefferson City, Mo 65110-4900. The current Bishop of the Diocese of Jefferson City is John Raymond Gaydos. Bishop John Raymond Gaydos is sued in his individual capacity and in his capacity as Bishop of the Diocese of Jefferson City.

82. At all times material, the Bishop of the Diocese of Joliet in Illinois controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Joliet in Illinois is located at 425 Summit St., Joliet, IL 60435. The current Bishop of the Diocese of Joliet in Illinois is Joseph J. Imesch. Bishop Joseph J. Imesch is sued in his individual capacity and in his capacity as Bishop of the Diocese of Joliet in Illinois.

83. At all times material, the Bishop of the Diocese of Juneau controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Juneau is located at 415 Sixth St., #300, Juneau, AK 99801. The current Bishop of the Diocese of Juneau is Michael W. Warfel. Bishop Michael W. Warfel is sued in his individual capacity and in his capacity as Bishop of the Diocese of Juneau.

84. At all times material, the Bishop of the Diocese of Kalamazoo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Kalamazoo is located at 215 N. Westnedge Ave., Kalamazoo, MI 49007-3760. The current Bishop

of the Diocese of Kalamazoo is James A. Murray. Bishop James A. Murray is sued in his individual capacity and in his capacity as Bishop of the Diocese of Kalamazoo.

85. At all times material, the Archbishop of the Archdiocese of Kansas City in Kansas controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Kansas City in Kansas is located at 12615 Parallel Pkwy., Kansas City, KS 66109. The current Archbishop of the Archdiocese of Kansas City in Kansas is Joseph F. Naumann. Archbishop Joseph S. Naumann is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Kansas City in Kansas.

86. At all times material, the Bishop of the Diocese of Kansas City-St. Joseph controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Kansas City-St. Joseph is located at P.O. Box 419037, Kansas City, Mo 64141-6037. The current Bishop of the Diocese of Kansas City-St. Joseph is Robert W. Finn. Bishop Robert W. Finn is sued in his individual capacity and in his capacity as Bishop of the Diocese of Kansas City-St. Joseph.

87. At all times material, the Bishop of the Diocese of Knoxville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Knoxville is located at 805 Northshore Dr., SW, P.O. Box 11127, Knoxville, TN 37939-1127. The current Bishop of the Diocese of Knoxville is Joseph E. Kurtz. Bishop Joseph E. Kurtz is sued in his individual capacity and in his capacity as Bishop of the Diocese of Knoxville.

88. At all times material, the Bishop of the Diocese of La Crosse controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of La Crosse is located at 3710 East Avenue S., P.O. Box 4004. The current Bishop of the Diocese of La Crosse is Jerome E. Listecki. Bishop Jerome E. Listecki is sued in his individual capacity and in his capacity as Bishop of the Diocese of La Crosse.

89. At all times material, the Bishop of the Diocese of Lafayette controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Lafayette is located at 1408 Carmel Dr., Lafayette, LA 70501. The current Bishop of the Diocese of Lafayette is Michael Jarrell. Bishop Michael Jarrell is sued in his individual capacity and in his capacity as Bishop of the Diocese of Lafayette.

90. At all times material, the Bishop of the Diocese of Lafayette in Indiana controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Lafayette in Indiana is located at P.O. Box 260, Lafayette, IN 47902-0260. The current Bishop of the Diocese of Lafayette is William L. Higi. Bishop William L. Higi is sued in his individual capacity and in his capacity as Bishop of the Diocese of Lafayette.

91. At all times material, the Bishop of the Diocese of Lake Charles controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Lake Charles is located at 414 Iris St., P.O. Box 3223, Lake Charles, LA 70602. The current Bishop of the Diocese of Lake Charles is Jude Speyrer. Bishop Jude Speyrer is sued in his individual capacity and in his capacity as Bishop of the Diocese of Lake Charles.

92. At all times material, the Bishop of the Diocese of Lansing controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Lansing is located at 300 W. Ottawa, Lansing, MI 48933. The current Bishop of the Diocese of Lansing is Carl F. Mengeling. Bishop Carl F. Mengeling is sued in his individual capacity and in his capacity as Bishop of the Diocese of Lansing.

93. At all times material, the Bishop of the Diocese of Laredo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Laredo is located at 1901 Corpus Christi. The current Bishop of the Diocese of Laredo is James A. Tamayo.

Bishop James A. Tamayo is sued in his individual capacity and in his capacity as Bishop of the Diocese of Laredo.

94. At all times material, the Bishop of the Diocese of Las Cruces controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Las Cruces is located at 1280 med Park Dr., Las Cruces, NM 88005. The current Bishop of the Diocese of Las Cruces is Ricardo Ramirez. Bishop Ricardo Ramirez is sued in his individual capacity and in his capacity as Bishop of the Diocese of Las Cruces.

95. At all times material, the Bishop of the Diocese of Las Vegas controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Las Vegas is located at 336 Cathedral Way, Las Vegas NV 89109. The current Bishop of the Diocese of Las Vegas is Joseph A. Pepe. Bishop Joseph A. Pepe is sued in his individual capacity and in his capacity as Bishop of the Diocese of Las Vegas.

96. At all times material, the Bishop of the Diocese of Lexington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Lexington is located at 1310 W. Main St., Lexington, KY 40508-2048. The current Bishop of the Diocese of Lexington is Ronald W. Gainer. Bishop Robert W. Gainer is sued in his individual capacity and in his capacity as Bishop of the Diocese of Lexington.

97. At all times material, the Bishop of the Diocese of Lincoln controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Lincoln is located at P.O. Box 80328, Lincoln, NE 68501-0328. The current Bishop of the Diocese of Lincoln is Fabian W. Bruskewitz. Bishop Fabian W. Bruskewitz is sued in his individual capacity and in his capacity as Bishop of the Diocese of Lincoln.

98. At all times material, the Bishop of the Diocese of Little Rock controlled, operated

and managed the affairs of the Diocese. The principal place of business of the Diocese of Little Rock is located at 2500 N. Tyler St., P.O. Box 7565, Little Rock, AR 72217. The current Bishop of the Diocese of Little Rock is James Peter Sartain. Bishop James Peter Sartain is sued in his individual capacity and in his capacity as Bishop of the Diocese of Little Rock.

99. At all times material, the Archbishop of the Archdiocese of Los Angeles controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Los Angeles is located at 3424 Wilshire Blvd., Los Angeles, CA 90010-2202. The current Archbishop of the Archdiocese of Los Angeles is Roger Cardinal Mahony. Archbishop Roger Cardinal Mahony is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Los Angeles.

100. At all times material, the Archbishop of the Archdiocese of Louisville controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Louisville is located at 212 E. College Street, P.O. Box 1073, Louisville, KY 40201. The current Archbishop of the Archdiocese of Louisville is Thomas C. Kelly. Archbishop Thomas C. Kelly is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Louisville.

101. At all times material, the Bishop of the Diocese of Lubbock controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Lubbock is located at P.O. Box 98700, Lubbock, TX 79499-8700. The current Bishop of the Diocese of Lubbock is Placido Rodriguez. Bishop Placido Rodriguez is sued in his individual capacity and in his capacity as Bishop of the Diocese of Lubbock.

102. At all times material, the Bishop of the Diocese of Madison controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Madison is

located at 702 S. High Point Road, P.O. Box 44983. The current Bishop of the Diocese of Madison is Robert C. Morlino. Bishop Robert C. Morlino is sued in his individual capacity and in his capacity as Bishop of the Diocese of Madison.

103. At all times material, the Bishop of the Diocese of Manchester controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Manchester is located at 153 Ash St., P.O. Box 310, Manchester, NH 03105. The current Bishop of the Diocese of Manchester is John B. McCormack. Bishop John B. McCormack is sued in his individual capacity and in his capacity as Bishop of the Diocese of Manchester.

104. At all times material, the Bishop of the Diocese of Marquette controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Marquette is located at 117 W. Washington St., P.O. Box 1000, Marquette, WI 49855. The current Bishop of the Diocese of Marquette is Alexander K. Sample. Bishop Alexander K. Sample is sued in his individual capacity and in his capacity as Bishop of the Diocese of Marquette.

105. At all times material, the Bishop of the Diocese of Memphis controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Memphis is located at P.O. Box 341669, Memphis, TN 38184-1669. The current Bishop of the Diocese of Memphis is J. Terry Steib. Bishop J. Terry Steib is sued in his individual capacity and in his capacity as Bishop of the Diocese of Memphis.

106. At all times material, the Bishop of the Diocese of Metuchen controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Metuchen is located at P.O. Box 191, Metuchen, NJ 08840. The current Bishop of the Diocese of Metuchen is Paul G. Bootkoski. Bishop Paul G. Bootkoski is sued in his individual capacity and in his capacity as Bishop of the Diocese of Metuchen.



107. At all times material, the Archbishop of the Archdiocese of Miami controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Miami is located at 9401 Biscayne Blvd., Miami, Fl 33138. The current Archbishop of the Archdiocese of Miami is Thomas C. Kelly. Archbishop Thomas C. Kelly is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Miami.

108. At all times material, the Archbishop of the Archdiocese for the Military Services, U.S.A. controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese for the Military Services, U.S.A. is located at P.O. Box 4469, Washington, DC 20017-0469. The current Archbishop of the Archdiocese of for the Military Services, U.S.A. is Edwin F. O'Brien. Archbishop Edwin F. O'Brien is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese for the Military Services, U.S.A.

109. At all times material, the Archbishop of the Archdiocese of Milwaukee controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Milwaukee is located at 3501 S. Lake Dr., P.O. Box 070912, Milwaukee, WI 53207-0912. The current Archbishop of the Archdiocese of Milwaukee is Timothy Dolan . Archbishop Timothy Dolan is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Milwaukee.

110. At all times material, the Archbishop of the Archdiocese of Mobile controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Mobile is located at 400 Government St., P.O. Box 1966, Mobile, AL 36633. The current Archbishop of the Archdiocese of Mobile is Oscar H. Lipscomb. Archbishop Oscar H. Lipscomb is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Mobile.

111. At all times material, the Bishop of the Diocese of Monterey in California controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Monterey in California is located at 631 Abrego St., Monterey, CA 93940. The current Bishop of the Diocese of Monterey in California is Sylvester D. Ryan. Bishop Sylvester D. Ryan is sued in his individual capacity and in his capacity as Bishop of the Diocese of Monterey in California.

112. At all times material, the Bishop of the Diocese of Nashville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Nashville is located at 2400 21<sup>st</sup> Ave. S., Nashville, TN 37212. The current Bishop of the Diocese of Nashville is David R. Choby. Bishop David R. Choby is sued in his individual capacity and in his capacity as Bishop of the Diocese of Nashville.

113. At all times material, the Archbishop of the Archdiocese of Newark controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Newark is located at 171 Clifton Ave., P.O. Box 9500, Newark, NJ 07104-9500. The current Archbishop of the Archdiocese of Newark is John J. Meyers. Archbishop John J. Meyers is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Newark.

114. At all times material, the Archbishop of the Archdiocese of New Orleans controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of New Orleans is located at 7887 Walmsley Ave., New Orleans, LA 70125-3496. The current Archbishop of the Archdiocese of New Orleans is Alfred C. Hughes. Archbishop Alfred C. Hughes is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of New Orleans.

115. At all times material, the Bishop of the Diocese of New Ulm controlled, operated and

managed the affairs of the Diocese. The principal place of business of the Diocese of New Ulm is located at 1400 6<sup>th</sup> Street North, New Ulm, MN 56073-2099. The current Bishop of the Diocese of New Ulm is John C. Nienstedt. Bishop John C. Nienstedt is sued in his individual capacity and in his capacity as Bishop of the Diocese of New Ulm.

116. At all times material, the Archbishop of the Archdiocese of New York controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of New York is located at 1011 First Ave., New York, NY 10022. The current Archbishop of the Archdiocese of New York is Edward Cardinal Egan. Archbishop Edward Cardinal Egan is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of New York.

117. At all times material, the Bishop of the Diocese of Norwich controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Norwich is located at 201 Broadway, Norwich, CT 06360. The current Bishop of the Diocese of Norwich is Michael R. Cote. Bishop Michael R. Cote is sued in his individual capacity and in his capacity as Bishop of the Diocese of Norwich.

118. At all times material, the Bishop of the Diocese of Oakland controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Oakland is located at 2900 Lakeshore Ave., Oakland, CA 94610-3697. The current Bishop of the Diocese of Oakland is Allen H. Vigneron. Bishop Allen H. Vigneron is sued in his individual capacity and in his capacity as Bishop of the Diocese of Oakland.

119. At all times material, the Bishop of the Diocese of Ogdensburg controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Ogdensburg is located at P.O. Box 369, Ogdensburg, NY 13669. The current Bishop of the Diocese

of Ogdensburg is Robert Joseph Cunningham. Bishop Robert Joseph Cunningham is sued in his individual capacity and in his capacity as Bishop of the Diocese of Ogdensburg.

120. At all times material, the Archbishop of the Archdiocese of Oklahoma City controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Oklahoma City is located at 7501 Northwest Expwy., P.O. Box 32180, Oklahoma City, OK 73123. The current Archbishop of the Archdiocese of Oklahoma City is Eusebius J. Beltran. Archbishop Eusebius J. Beltran is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Oklahoma City.

121. At all times material, the Archbishop of the Archdiocese of Omaha controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Omaha is located at 100 N. 62 St., Omaha, NE 68132-2795. The current Archbishop of the Archdiocese of Omaha is Elden Francis Curtiss. Archbishop Elden Francis Curtiss is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Omaha.

122. At all times material, the Bishop of the Diocese of Orange in California controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Orange in California is located at 2811 E. Villa Real Dr., P.O. Box 14195, Orange, CA 92863. The current Bishop of the Diocese of Orange in California is Tod David Brown. Bishop Tod David Brown is sued in his individual capacity and in his capacity as Bishop of the Diocese of Orange in California.

123. At all times material, the Bishop of the Diocese of Orlando controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Orlando is located at 50 E. Robinson St., Orlando, FL 32801. The current Bishop of the Diocese of Orlando is Thomas G. Wenski. Bishop Thomas G. Wenski is sued in his individual capacity and in his

capacity as Bishop of the Diocese of Orlando.

124. At all times material, the Bishop of the Diocese of Owensboro controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Owensboro is located at 600 Locust St., Owensboro, KY 42301. The current Bishop of the Diocese of Owensboro is John J. McGraith. Bishop John J. McGraith is sued in his individual capacity and in his capacity as Bishop of the Diocese of Owensboro.

125. At all times material, the Bishop of the Diocese of Palm Beach controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Palm Beach is located at 9995 N. Military Tr., Palm Beach Gardens, FL 33410. The current Bishop of the Diocese of Palm Beach is Gerald M. Barbarito. Bishop Gerald M. Barbarito is sued in his individual capacity and in his capacity as Bishop of the Diocese of Palm Beach.

126. At all times material, the Bishop of the Diocese of Paterson controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Paterson is located at 777 Valley Rd., Clifton, NJ 07013. The current Bishop of the Diocese of Paterson is Arthur J. Serratelli. Bishop Arthur J. Serratelli is sued in his individual capacity and in his capacity as Bishop of the Diocese of Paterson

127. At all times material, the Bishop of the Diocese of Pensacola-Tallahassee controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Pensacola-Tennessee is located at 11 North B St., Pensacola, FL 32501. The current Bishop of the Diocese of Pensacola-Tennessee is John H. Ricard. Bishop John H. Ricard is sued in his individual capacity and in his capacity as Bishop of the Diocese of Pensacola-Tennessee.

128. At all times material, the Bishop of the Diocese of Peoria controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Peoria is

located at 607 NE Madison Ave., Peoria, IL 61603. The current Bishop of the Diocese of Peoria is Daniel R. Jenky. Bishop David R. Jenky is sued in his individual capacity and in his capacity as Bishop of the Diocese of Peoria.

129. At all times material, the Archbishop of the Archdiocese of Philadelphia controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Philadelphia is located at 222 N. 17<sup>th</sup> St., Philadelphia, PA 19103-1299. The current Archbishop of the Archdiocese of Philadelphia is Cardinal Justin Regali. Archbishop Cardinal Justin Regali is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Philadelphia.

130. At all times material, the Bishop of the Diocese of Phoenix controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Phoenix is located at 400 E Monroe St., Phoenix, AZ 85004-2336. The current Bishop of the Diocese of Phoenix is Thomas J. Olmsted. Bishop Thomas J. Olmsted is sued in his individual capacity and in his capacity as Bishop of the Diocese of Phoenix.

131. At all times material, the Bishop of the Diocese of Pittsburgh controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Pittsburgh is located at 111 Blvd. Of the Allies, Pittsburgh, PA 15222-1618. The current Bishop of the Diocese of Pittsburgh is Donald W. Wuerl. Bishop Donald W. Wuerl is sued in his individual capacity and in his capacity as Bishop of the Diocese of Pittsburgh.

132. At all times material, the Bishop of the Diocese of Portland (In Maine) controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Portland (In Maine) is located at 510 Ocean Ave., P.O. Box 11559, Portland, ME 04104-7559. The current Bishop of the Diocese of Portland (In Maine) is Richard J. Malone. Bishop Richard J.

Malone is sued in his individual capacity and in his capacity as Bishop of the Diocese of Portland (In Maine).

133. At all times material, the Archbishop of the Archdiocese of Portland in Oregon controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Portland in Oregon is located at 2838 E. Burnside St., Portland, OR 97214-1895. The current Archbishop of the Archdiocese of Portland in Oregon is John G. Vlazny. Archbishop John G. Vlazny is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Portland in Oregon.

134. At all times material, the Bishop of the Diocese of Providence controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Providence is located at One Cathedral Square, Providence, RI 02903-3695. The current Bishop of the Diocese of Providence is Thomas J. Tobin. Bishop Thomas J. Tobin is sued in his individual capacity and in his capacity as Bishop of the Diocese of Providence.

135. At all times material, the Bishop of the Diocese of Pueblo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Pueblo is located at 1001 Grand Ave., Pueblo, CO 81003. The current Bishop of the Diocese of Pueblo is Arthur N. Tafoya. Bishop Arthur N. Tafoya is sued in his individual capacity and in his capacity as Bishop of the Diocese of Pueblo.

136. At all times material, the Bishop of the Diocese of Raleigh controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Raleigh is located at 715 Nazareth St., Raleigh, NC 27606. The current Bishop of the Diocese of Raleigh is F. Joseph Grossman. Bishop F. Joseph Grossman is sued in his individual capacity and in his capacity as Bishop of the Diocese of Raleigh.

137. At all times material, the Bishop of the Diocese of Rapid City controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Rapid City is located at 606 Cathedral Dr., Rapid City, SD 57701. The current Bishop of the Diocese of Rapid City is Blase J. Cupich. Bishop Blase J. Cupich is sued in his individual capacity and in his capacity as Bishop of the Diocese of Raleigh.

138. At all times material, the Bishop of the Diocese of Reno controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Reno is located at 290 S. Arlington Ave., Ste. 200, Reno, NY 89501. The current Bishop of the Diocese of Reno is Randolph R. Calvo. Bishop Randolph R. Calvo is sued in his individual capacity and in his capacity as Bishop of the Diocese of Reno.

139. At all times material, the Bishop of the Diocese of Richmond controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Richmond is located at 811 Cathedral Pl., Richmond, VA 23220-4801. The current Bishop of the Diocese of Richmond is Francis X. DiLorenzo. Bishop Francis X. DiLorenzo is sued in his individual capacity and in his capacity as Bishop of the Diocese of Richmond.

140. At all times material, the Bishop of the Diocese of Rochester controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Rochester is located at 1150 Buffalo Rd., Rochester NY 14624-1890. The current Bishop of the Diocese of Rochester is Matthew H. Clark. Bishop Matthew H. Clark is sued in his individual capacity and in his capacity as Bishop of the Diocese of Rochester.

141. At all times material, the Bishop of the Diocese of Rockford controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Rockford is located at 555 Colman Center Dr., P.O. Box 7044, Rockford, IL 61125. The current Bishop of the



Diocese of Rockford is Thomas G. Doran. Bishop Thomas G. Doran is sued in his individual capacity and in his capacity as Bishop of the Diocese of Rockford.

142. At all times material, the Bishop of the Diocese of Rockville Centre controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Rockville Center is located at P.O. Box 9023, Rockville Centre, NY 11571-9023. The current Bishop of the Diocese of Rockville Centre is William Francis Murphy. Bishop William Francis Murphy is sued in his individual capacity and in his capacity as Bishop of the Diocese of Rockville Centre.

143. At all times material, the Bishop of the Diocese of Sacramento controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Sacramento is located at 2110 Broadway, Sacramento, CA 95818-2541. The current Bishop of the Diocese of Sacramento is William K. Weigand. Bishop William K. Weigand is sued in his individual capacity and in his capacity as Bishop of the Diocese of Sacramento.

144. At all times material, the Bishop of the Diocese of Saginaw controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Saginaw is located at 5800 Weiss St., MI 48603-2799. The current Bishop of the Diocese of Saginaw is Robert James Carlson. Bishop Robert James Carlson is sued in his individual capacity and in his capacity as Bishop of the Diocese of Saginaw.

145. At all times material, the Bishop of the Diocese of St. Augustine controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of St. Augustine is located at 11625 Old St. Augustine Rd., Jacksonville, FL 32258. The current Bishop of the Diocese of St. Augustine is Victor Benito Galeone. Bishop Victor Benito Galeone is sued in his individual capacity and in his capacity as Bishop of the Diocese of St. Augustine.

146. At all times material, the Bishop of the Diocese of St. Cloud controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of St. Cloud is located at 214 Third Ave. S, P.O. Box 1248, St. Cloud, MN 56302. The current Bishop of the Diocese of St. Cloud is John F. Kinney. Bishop John F. Kinney is sued in his individual capacity and in his capacity as Bishop of the Diocese of St. Cloud.

147. At all times material, the Archbishop of the Archdiocese of St. Louis controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of St. Louis is located at 4445 Lindell Blvd., St. Louis, MO 63108-2497. The current Archbishop of the Archdiocese of St. Louis is Raymond L. Burke. Archbishop Raymond L. Burke is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of St. Louis.

148. At all times material, the Archbishop of the Archdiocese of St. Paul and Minneapolis controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of St. Paul and Minneapolis is located at 226 Summit Ave., St. Paul, MN 55102. The current Archbishop of the Archdiocese of St. Paul and Minneapolis is Harry J. Flynn. Archbishop Harry J. Flynn is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of St. Paul and Minneapolis.

149. At all times material, the Bishop of the Diocese of St. Petersburg controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of St. Petersburg is located at P.O. Box 40200, St. Petersburg, FL 33743-0200. The current Bishop of the Diocese of St. Petersburg is Robert N. Lynch. Bishop Robert N. Lynch is sued in his individual capacity and in his capacity as Bishop of the Diocese of St. Petersburg.

150. At all times material, the Bishop of the Diocese of Salina controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Salina is

located at 103 N. Ninth, P.O. Box 980, Salina, KS 67402-0980. The current Bishop of the Diocese of Salina is Paul S. Coakley. Bishop Paul S. Coakley is sued in his individual capacity and in his capacity as Bishop of the Diocese of Salina.

151. At all times material, the Bishop of the Diocese of Salt Lake City controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Salt Lake City is located at 27 C St., Salt Lake City, UT 84103-2397. The current Bishop of the Diocese of Salt Lake City is (Vacant See). Bishop (Vacant See) is sued in his individual capacity and in his capacity as Bishop of the Diocese of Salt Lake City.

152. At all times material, the Bishop of the Diocese of San Angelo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of San Angelo is located at P.O. Box 1829, San Angelo, TX 76902. The current Bishop of the Diocese of San Angelo is Michael D. Pfeifer. Bishop Michael D. Pfeifer is sued in his individual capacity and in his capacity as Bishop of the Diocese of San Angelo.

153. At all times material, the Archbishop of the Archdiocese of San Antonio controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of San Antonio is located at 2718 W. Woodlawn Ave., P.O. Box 28410, San Antonio, TX 78201. The current Archbishop of the Archdiocese of San Antonio is Jose H. Gomez. Archbishop Jose H. Gomez is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of San Antonio.

154. At all times material, the Bishop of the Diocese of San Bernardino controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of San Bernardino is located at 1201 E. Highland Ave., San Bernardino, CA 92404-4641. The current Bishop of the Diocese of San Bernardino is Gerald R. Barnes. Bishop Gerald R. Barnes is sued in

his individual capacity and in his capacity as Bishop of the Diocese of San Bernardino.

155. At all times material, the Bishop of the Diocese of San Diego controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of San Diego is located at P.O. Box 85728, San Diego, CA 92186-5728. The current Bishop of the Diocese of San Diego is Robert H. Brom. Bishop Robert H. Brom is sued in his individual capacity and in his capacity as Bishop of the Diocese of San Diego.

156. At all times material, the Archbishop of the Archdiocese of San Francisco controlled, operated and managed the affairs of the Diocese. The principal place of business of the Archdiocese of San Francisco is located at One Peter Yorke Way, San Francisco, CA 94109-6602. The current Archbishop of the Archdiocese of San Francisco is George H. Niederauer. Archbishop George H. Niederauer is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of San Francisco.

157. At all times material, the Bishop of the Diocese of San Jose in California controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of San Jose in California is located at 900 Lafayette St., Ste. 301, Santa Clara, CA 95050-4966 . The current Bishop of the Diocese of San Jose in California is Patrick J. McGrath. Bishop Patrick J. McGrath is sued in his individual capacity and in his capacity as Bishop of the Diocese of San Jose in California.

158. At all times material, the Archbishop of the Archdiocese of Santa Fe controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Santa Fe is located at 4000 St. Joseph Pl., NW, Albuquerque, NM 87120. The current Archbishop of the Archdiocese of Santa Fe is Michael J. Sheehan. Archbishop Michael J. Sheehan is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of

Santa Fe.

159. At all times material, the Bishop of the Diocese of Santa Rosa in California controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Santa Rosa in California is located at 987 Airway Ct., Santa Rosa, CA 95403 . The current Bishop of the Diocese of Santa Rosa in California is Daniel F. Walsh. Bishop Daniel F. Walsh is sued in his individual capacity and in his capacity as Bishop of the Diocese of Santa Rosa in California.

160. At all times material, the Bishop of the Diocese of Savannah controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Savannah is located at 601 E. Liberty St., Savannah, GA 31401-5196. The current Bishop of the Diocese of Savannah is J. Kevin Boland. Bishop J. Kevin Boland is sued in his individual capacity and in his capacity as Bishop of the Diocese of Savannah.

161. At all times material, the Bishop of the Diocese of Scranton controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Scranton is located at 300 Wyoming Ave., Scranton, PA 18503. The current Bishop of the Diocese of Scranton is Joseph F. Martino. Bishop Joseph F. Martino is sued in his individual capacity and in his capacity as Bishop of the Diocese of Scranton.

162. At all times material, the Archbishop of the Archdiocese of Seattle controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Seattle is located at 910 Marion St., Seattle, WA 98104. The current Archbishop of the Archdiocese of Seattle is Alexander J. Brunett. Archbishop Alexander J. Brunett is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Seattle.

163. At all times material, the Bishop of the Diocese of Shreveport controlled, operated

and managed the affairs of the Diocese. The principal place of business of the Diocese of Shreveport is located at 3500 Fairfield Ave., Shreveport, LA 71104. The current Bishop of the Diocese of Shreveport is William B. Friend. Bishop William B. Friend is sued in his individual capacity and in his capacity as Bishop of the Diocese of Shreveport.

164. At all times material, the Bishop of the Diocese of Sioux City controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Sioux City is located at 1821 Jackson St., P.O. Box 3379, Sioux City, IA 51102-3379. The current Bishop of the Diocese of Sioux City is R. Walker Nickless. Bishop R. Walker Nickless is sued in his individual capacity and in his capacity as Bishop of the Diocese of Sioux City.

165. At all times material, the Bishop of the Diocese of Sioux Falls controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Sioux Falls is located at 523 N. Duluth Ave., Sioux Falls, SD 57104. The current Bishop of the Diocese of Sioux Falls is Paul Vincent Dudley. Bishop Paul Vincent Dudley is sued in his individual capacity and in his capacity as Bishop of the Diocese of Sioux Falls.

166. At all times material, the Bishop of the Diocese of Spokane controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Spokane is located at W. 1023 Riverside Ave., P.O. Box 1453, Spokane, WA 99210-1453. The current Bishop of the Diocese of Spokane is William S. Skylstad. Bishop R. William S. Skylstad is sued in his individual capacity and in his capacity as Bishop of the Diocese of Spokane.

167. At all times material, the Bishop of the Diocese of Springfield-Cape Girardeau controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Springfield-Cape Girardeau is located at 601 S. Jefferson Ave., Springfield, MO 65806-3143. The current Bishop of the Diocese of Springfield-Cape Girardeau is John J. Leibrecht. Bishop

John J. Leibrecht is sued in his individual capacity and in his capacity as Bishop of the Diocese of Springfield-Cape Girardeau.

168. At all times material, the Bishop of the Diocese of Springfield in Illinois controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Springfield in Illinois is located at 1615 W. Washington St., P.O. Box 3187, Springfield, IL 62708-3187. The current Bishop of the Diocese of Springfield in Illinois is George J. Lucas. Bishop George J. Lucas is sued in his individual capacity and in his capacity as Bishop of the Diocese of Springfield in Illinois.

169. At all times material, the Bishop of the Diocese of Springfield in Massachusetts controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Springfield in Massachusetts is located at P.O. Box 1730, Springfield, MA 01102-1730. The current Bishop of the Diocese of Springfield in Massachusetts is Timothy A. McDonnell. Bishop Timothy A. McDonnell is sued in his individual capacity and in his capacity as Bishop of the Diocese of Springfield in Massachusetts.

170. At all times material, the Bishop of the Diocese of Steubenville controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Steubenville is located at 422 Washington St., P.O. Box 969, Steubenville, OH 43952-5969. The current Bishop of the Diocese of Steubenville is R. Daniel Conlon. Bishop R. Daniel Conlon is sued in his individual capacity and in his capacity as Bishop of the Diocese of Steubenville.

171. At all times material, the Bishop of the Diocese of Stockton controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Stockton is located at 1105 N. Lincoln St., Stockton, CA 95203. The current Bishop of the Diocese of Stockton is Stephen E. Blaire. Bishop Stephen E. Blaire is sued in his individual capacity and in his capacity

as Bishop of the Diocese of Stockton.

172. At all times material, the Bishop of the Diocese of Superior controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Superior is located at 1204 Hughitt Ave., Superior, WI 54880. The current Bishop of the Diocese of Superior is Raphael M. Fliss. Bishop Raphael M. Fliss is sued in his individual capacity and in his capacity as Bishop of the Diocese of Superior.

173. At all times material, the Bishop of the Diocese of Syracuse controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Syracuse is located at P.O. Box 511, Syracuse, NY 13201. The current Bishop of the Diocese of Syracuse is James M. Moynihan. Bishop James M. Moynihan is sued in his individual capacity and in his capacity as Bishop of the Diocese of Syracuse.

174. At all times material, the Bishop of the Diocese of Toledo controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Toledo is located at P.O. Box 985, Toledo, OH 43697-0985. The current Bishop of the Diocese of Toledo is Leonard P. Blair. Bishop Leonard P. Blair is sued in his individual capacity and in his capacity as Bishop of the Diocese of Toledo.

175. At all times material, the Bishop of the Diocese of Trenton controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Trenton is located at 701 Lawrenceville Rd., P.O. Box 5147, Trenton, NJ 08638. The current Bishop of the Diocese of Trenton is John M. Smith. Bishop John M. Smith is sued in his individual capacity and in his capacity as Bishop of the Diocese of Trenton.

176. At all times material, the Bishop of the Diocese of Tucson controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Tucson is



located at 111 S. Church Ave., P.O. Box 31, Tucson, AZ 85702. The current Bishop of the Diocese of Tucson is Gerald F. Kicanas. Bishop Gerald F. Kicanas is sued in his individual capacity and in his capacity as Bishop of the Diocese of Tucson.

177. At all times material, the Bishop of the Diocese of Tulsa controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Tulsa is located at 12300 <sup>91st</sup> St., Broken Arrow, OK 74012. The current Bishop of the Diocese of Tulsa is Edward J. Slattery. Bishop Edward J. Slattery is sued in his individual capacity and in his capacity as Bishop of the Diocese of Tulsa.

178. At all times material, the Bishop of the Diocese of Tyler controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Tyler is located at 1015 E.S.E. Loop 323, Tyler TX 75701-9663. The current Bishop of the Diocese of Tyler is Alvaro Corrada del Rio. Bishop Alvaro Corrada del Rio is sued in his individual capacity and in his capacity as Bishop of the Diocese of Tyler.

179. At all times material, the Bishop of the Diocese of Venice controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Venice is located at P.O. Box 2006, Venice, FL 34284. The current Bishop of the Diocese of Venice is John J. Nevins. Bishop John J. Nevins is sued in his individual capacity and in his capacity as Bishop of the Diocese of Venice.

180. At all times material, the Bishop of the Diocese of Victoria in Texas controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Victoria in Texas is located at P.O. Box 4070, Victoria, TX 77903. The current Bishop of the Diocese of Victoria in Texas is David E. Fellhauer. Bishop David E. Fellhauer is sued in his individual capacity and in his capacity as Bishop of the Diocese of Victoria in Texas.

181. At all times material, the Archbishop of the Archdiocese of Washington controlled, operated and managed the affairs of the Archdiocese. The principal place of business of the Archdiocese of Washington is located at 5001 Eastern Ave., P.O. Box 29260, Washington, D.C. 20017. The current Archbishop of the Archdiocese of Washington is Theodore Cardinal McCarrick. Archbishop Theodore Cardinal McCarrick is sued in his individual capacity and in his capacity as Archbishop of the Archdiocese of Washington.

182. At all times material, the Bishop of the Diocese of Wheeling-Charleston controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Wheeling-Charleston is located at 1300 Byron St., Wheeling, WV 26003. The current Bishop of the Diocese of Wheeling-Charleston is Michael J. Bransfield. Bishop Michael J. Bransfield is sued in his individual capacity and in his capacity as Bishop of the Diocese of Michael J. Bransfield.

183. At all times material, the Bishop of the Diocese of Wichita controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Wichita is located at 424 N. Broadway, Wichita, KS 67202. The current Bishop of the Diocese of Wichita is Michael Owen Jackels. Bishop Michael Owen Jackels is sued in his individual capacity and in his capacity as Bishop of the Diocese of Wichita.

184. At all times material, the Bishop of the Diocese of Wilmington controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Wilmington is located at P.O. Box 2030, Wilmington, DE 19899-2030. The current Bishop of the Diocese of Willmington is Michael A. Saltarelli. Bishop Michael A. Saltarelli is sued in his individual capacity and in his capacity as Bishop of the Diocese of Wilmington.

185. At all times material, the Bishop of the Diocese of Winona controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Winona is

located at 55 W. Sanborn St., P.O. Box 588, Winona, MN 55987. The current Bishop of the Diocese of Winona is Bernard J. Harrington. Bishop Bernard J. Harrington is sued in his individual capacity and in his capacity as Bishop of the Diocese of Winona.

186. At all times material, the Bishop of the Diocese of Worcester controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Worcester is located at 49 Elm St, Worcester, MA 01609. The current Bishop of the Diocese of Worcester is Robert J. McManus. Bishop Robert J. McManus is sued in his individual capacity and in his capacity as Bishop of the Diocese of Worcester.

187. At all times material, the Bishop of the Diocese of Yakima controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Yakima is located at 5301-A Tieton Dr., Yakima, WA 98908. The current Bishop of the Diocese of Yakima is Carlos A. Sevilla. Bishop Carlos A. Sevilla is sued in his individual capacity and in his capacity as Bishop of the Diocese of Yakima.

188. At all times material, the Bishop of the Diocese of Youngstown controlled, operated and managed the affairs of the Diocese. The principal place of business of the Diocese of Youngstown is located at 144 W. Wood St., Youngstown, OH 44503. The current Bishop of the Diocese of Youngstown is Benedict C. Franzetta. Bishop Benedict C. Franzetta is sued in his individual capacity and in his capacity as Bishop of the Diocese of Youngstown.

### **CLASS ACTION ALLEGATIONS**

189. Plaintiffs bring this action on behalf of themselves and all others similarly situated, as a class action pursuant to Wisconsin Rules of Civil Procedure. The class of people that plaintiffs seek to represent are persons who have been harmed as a result of the Defendant Bishops and Defendant USCCB's practice and policy of not reporting suspected child abuse to law enforcement

officials, those who have been molested as children by an agent of the Defendant Bishops and Defendant USCCB and on behalf of those children who have not yet been abused, but who are in imminent danger of abuse because the Defendant Bishops and Defendant USCCB have not reported the names and files of agents that have been accused of molesting children or accused of inappropriate sexual behavior with children to either the public or to law enforcement.

190. The Plaintiff class is so numerous that joinder of all members is impracticable. While the exact number of class members is unknown to Plaintiffs at this time, it is ascertainable by appropriate discovery, and Plaintiffs are informed and believe that the class includes thousands of members.

191. There are questions of fact or law common to the class, which predominate over questions affecting only individual members. The common questions of law or fact include, but are not limited to: whether each Bishop and the USCCB has failed to comply with laws requiring each Bishop and their agents to report suspected child abuse to law enforcement; whether the Bishops and the USCCB have released the names and locations of its agents or former agents who have been accused of molesting children to the public and law enforcement; whether each Bishop and the USCCB have documents that are evidence of their failure to report suspected child abuse; whether each Bishop and the USCCB have documents that are evidence of its agents harming and molesting children; and whether injunctive relief is appropriate.

192. Plaintiffs' claims are typical of the claims of the members of the class. Plaintiffs, like all members of the class, were harmed by the actions and policies of each Bishop and the USCCB, were molested by agents of the Bishops or the USCCB or are in imminent danger of being molested by agents or former agents of the Bishops or the USCCB because each Bishop and the USCCB have failed to report suspected child abuse.

193. The Plaintiffs will fairly and adequately protect the interests of the class. The interests of the plaintiffs are the same as those of all class members because they have all been harmed by the actions and policies of each Bishop and the USCCB or were molested by agents of the Bishops or the USCCB or are in imminent danger of being molested by agents or former agents of the Bishops or the USCCB because each Bishop and the USCCB have failed to report suspected child abuse. All have an interest in preventing the sexual abuse of any further children by agents and former agents of each Bishop and the USCCB. Plaintiffs have no interests which are adverse to the interests of the class members. Plaintiffs are adequate representatives of the class.

194. A class action is an appropriate method for the fair and efficient adjudication of the controversy alleged in this Complaint. The expense and burden of individual litigation would make it difficult or impossible for individual members of the class to redress the wrongs done to them. The cost to the court system of adjudication of such individualized litigation would be substantial. Individualized litigation would also present the potential for inconsistent or contradictory judgments and would magnify the delay and expense to all parties and the court system. By contrast, the conduct of this action as a class action presents far fewer management difficulties, conserves the resources of the parties and court system, and protects the rights of each class member. In addition, the prosecution of separate actions by the individual members of the class would create a risk of inconsistent or varying adjudications with respect to individual class members which would establish incompatible standards of conduct for the defendants.

195. The class defined herein is certifiable pursuant to Wisconsin Rules of Civil Procedure in that the Bishops and the USCCB have acted or have refused to act on grounds generally applicable to the class, thereby making final injunctive relief or declaratory relief appropriate.

196. There are a number of priests, brothers, and agents who each Bishop and the USCCB

continued in ministry after each Bishop and the USCCB knew or suspected that those agents had molested children.

197. The Bishops and the USCCB considered this a risk that had a solid basis for taking.

198. On information and belief, each Bishop and the USCCB did not report all allegations of childhood sexual abuse by its agents and former agents to law enforcement and the public.

199. On information and belief, each Bishop and the USCCB maintain some sort of files related to allegations of sexual misconduct by its agents and former agents. Additionally it maintains personnel files for all the Bishops and USCCB agents and former agents. These personnel files and sexual abuse files also contain evidence of the Bishops' and USCCB's failure to report suspected child abuse.

200. On information and belief, in 2002 each Bishop and the USCCB conducted an internal audit regarding the problem of agents who were or are sexual offenders.

201. On information and belief, as part of that audit the Bishops and the USCCB documented each allegation of sexual misconduct involving its agents and former agents.

202. On information and belief, the audit found that hundreds, possibly thousands, of agents of the Bishops and the USCCB harmed people and molested children.

203. On information and belief, the Bishops and the USCCB did not report all of these allegations of sexual misconduct to law enforcement.

204. On information and belief, the Bishops and the USCCB have never given law enforcement all of the documents of the Bishops and the USCCB agents and former agents accused of sexual misconduct.

205. On information and belief, the Bishops and the USCCB knew that child molesters had a very high rate of recidivism, meaning that they were likely to abuse more children. As such,

the Bishops and the USCCB knew that children who did not know what the Bishops and the USCCB knew about its agents and former agents and who unsuspectingly were around these agents and former agents were at a high risk to be sexually molested.

206. On information and belief, because of the high rate of recidivism, the Bishops' and USCCB's agents and former agents had probably already molested numerous children. As such, the Bishops and the USCCB knew that there were many victims out there that were hurt because of the Bishops' and the USCCB's policies of secrecy, deception, and self protection.

207. Children are at risk because the public and law enforcement does not know the identity and the locations of these agents and former agents of the Bishops and the USCCB who have been accused of sexual misconduct.

208. On information and belief, in 1992 Ryan Erickson sexually assaulted a minor child. Bishop Rafael Fliss and the Diocese of Superior knew about this sexual assault. Bishop Fliss and the Diocese of Superior never disclosed this information to the public, parishioners, or children at any of the parishes where they placed Erickson.

209. On information and belief, while Erickson was in the seminary he was requested to control the rabbit population because he was known as a good shot with a gun.

210. On information and belief, in 1996, Bishop Fliss and the Diocese of Superior had an evaluation for sexual abuse done on Erickson. Bishop Fliss and the Diocese of Superior never tell any of the parishioners or children that Erickson was evaluated for molesting children.

211. On information and belief, Erickson routinely had boys over to the Hudson (St. Patrick's) rectory, getting them drunk and keeping them there overnight.

212. On information and belief, the church secretary at St. Patrick's in Hudson, WI, saw Erickson, on several occasions, stand at her window (which overlooked the St. Patrick's parking lot),

making a gun with his thumb and forefinger, pretending to shoot at parishioners and school parents. Erickson told police investigators that he would sometimes shoot at animals with his BB gun from the same windows, wondering aloud if anyone was around that might get hit.

213. On information and belief, Erickson would often burn his dog with cigars or beat it. He was also reported to target practice with farm cats, tossing them into the air and shooting them. The deacon in the Hurley parish also saw him be "pretty brutal" to his dog.

214. On information and belief, Erickson had been previously treated for alcoholism at Hazelden during seminary. In addition, he was known to be a heavy drinker while working at the Hudson parish, getting drunk with friends or at parish festivals.

215. On information and belief, Erickson told police investigators that Fr. Peter Szleszinski (Pastor at St. Patrick's in Hudson parish) had approached Erickson about rumors that Erickson was having affairs with several women (plural) that Erickson was counseling in the Hudson parish.

216. On information and belief, a parish housekeeper at St. Patrick's in Hudson, WI saw Erickson with a gun in his car while he was preparing to go meet with his bishop in early 2002. Erickson said he needed it for protection.

217. On information and belief, Erickson told a parish deacon, at Sacred Heart parish in Hurley, that, instead of replacing a remote control that his dog chewed up, he would rather "invest in a 13 cent slug and put it right between the dog's eyes."

218. On information and belief, Bishop Rafael Fliss had information regarding Ryan Erickson's sexual misconduct and dangerous behavior before and during Ryan Erickson's time as a priest at St. Patrick's in Hudson, WI.

219. On information and belief, on February 1, 2002, Daniel O'Connell and Ryan Erickson had an argument because Daniel O'Connell told Erickson that he has learned that Erickson has been



accused of abusing children.

220. James Ellison was an intern for the O'Connell Funeral Home and working with Dan O'Connell in 2002.

221. On information and belief, on February 2, 2002, Ryan Erickson shoots and kills Dan O'Connell and James Ellison at the O'Connell Funeral Home in Hudson Wisconsin.

222. On information and belief, in October of 2002, Bishop Fliss and the Diocese of Superior require Erickson to undergo another psychological evaluation.

223. The murders of Dan O'Connell and James Ellison go unsolved by the law enforcement for over two years.

224. In November and December of 2004 Erickson is twice interviewed by the police. Erickson knew details about the murder crime scenes that had not been released to the public.

225. On December 13, 2004 the police ask Erickson for a third interview which he refuses to give.

226. On December 16, 2004 Erickson's rectory and church office are searched by police. They find child porn on Erickson's computer under the title of "holy Mass Prayers."

227. On December 19, 2004 Erickson commits suicide by hanging himself in his parish in Hurley, WI.

228. On October 3, 2005 Judge Eric Lundell rules that there is probable cause to believe that Erickson killed Dan O'Connell and James Ellison and that the murders were definitely premeditated.

229. On information and belief, Judge Lundell says that on a scale of 1 to 10 regarding the strength of the evidence against Ryan Erickson for the murders of Dan O'Connell and James Ellison, Judge Lundell would put the evidence at a 10.

230. Dan O'Connell and James Ellison would not have been murdered had Bishop Fliss and the Diocese of Superior made all of their knowledge regarding Erickson known to the public and law enforcement.

231. The named Plaintiffs in this lawsuit were harmed as a result of Bishop Fliss' and the Diocese of Superior's failure to report and make public the information that they had regarding Erickson's abuse of children and dangerous propensities.

232. The class of plaintiffs was also harmed as result of the Bishops' and the USCCB's failure to report suspected child abuse.

233. On information and belief, the USCCB and each of the Bishops came to a meeting of minds whereby they agreed to and did create a policy of secrecy and suppression of information in a conspiracy to cover up child sexual abuse and to ultimately avoid scandal in order to retain their power and financial influence in the nation. This conspiracy required the Bishops and the USCCB to not report suspected child abuse to law enforcement and the public.

234. The Bishops and the USCCB committed acts in furtherance of this conspiracy.

235. On information and belief, the Bishops' and the USCCB's conspiracy to not report suspected child abuse by its agents and employees was enforced, required and practiced in every state including Wisconsin.

### **COUNT I**

#### **(Injunction - Reporting of Suspected Abuse to Law Enforcement And Documents)**

236. Plaintiffs repeat and reallege every paragraph of this complaint as if set forth in Count I.

237. Plaintiffs bring Count I on their own behalf and on behalf of the class of similarly situated persons described in this Complaint.

238. The practices of the Bishops and the USCCB have endangered numerous children in the past and these practices will continue to put children at risk in the future.

239. Plaintiffs and the class have the right to not be harmed or sexually molested by agents and former agents of the Bishops and the USCCB.

240. The Bishops and the USCCB owe a duty to warn all children and their parents that come into contact with the Bishops' and the USCCB's agents or former agents of allegations of sexual misconduct by the agents and former agents because these children and their parents hold many of these agents and former agents in esteemed positions, which gives them virtually unlimited access to children.

241. The Bishops and the USCCB also owe a duty to children and their parents to release all of the names of agents and former agents against whom the Bishops and the USCCB have deemed to have credible allegations of sexual misconduct with children to law enforcement and to the public at large.

242. The Bishops and the USCCB also owe a duty to children and their parents to release all of the names of its agents and former agents that have been accused of sexual misconduct to the law enforcement and to the public at large.

243. Unless injunctive relief is granted, numerous children across the United States are at risk of being sexually molested by these agents and former agents of the Bishops and the USCCB. In order to ensure that children are protected and free from sexual molestation by the Bishops' and USCCB's agents and former agents, the Plaintiffs and the members of the class are entitled to an injunction ordering that the Bishops and the USCCB do the following:

a) Release the names and current location of all of the Bishops' and USCCB's agents and former agents that it uncovered in its 2002 audit as committing sexual misconduct to law

enforcement and to the public.

b) Release the names and current location of all of its agents and former agents that have been accused of sexual misconduct that the Bishops' and USCCB have learned about through any source to law enforcement and to the public.

c) Turn over any documents which are evidence of a failure by the Bishops and the USCCB to report suspected child abuse by its agents and former agents to law enforcement and the court, including any documents which are evidence of child molestation by the Bishops' and USCCB's agents and former agents.

Dated: August 8, 2006.

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