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8 Attorneys for the Roman Catholic Archbishop of  
9 Los Angeles, a corporation sole, also known as the  
10 Archdiocese of Los Angeles

11 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF FRESNO

13 ROBERT DOE,

14 Plaintiff,

15 v.

16 JAMES ROE 1, et al.,

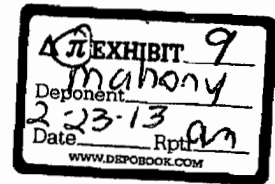
17 Defendants.

) Case No. CV022793

)  
) RESPONSE TO DEPOSITION SUBPOENA  
) FOR BUSINESS RECORDS

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22 PROPOUNDING PARTY: Plaintiff Robert Doe

23 RESPONDING PARTY: Custodian of Records, Archdiocese of Los Angeles  
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1 The Archdiocese of Los Angeles responds to the deposition subpoena for production of  
2 business records propounded by Plaintiff Robert Doe by production of the attached documents,  
3 bates numbers ALLI 00001 through ALLI 00037.

4  
5 Dated: March 21, 2005.

HENNIGAN, BENNETT & DORMAN, L.L.P.  
J. Michael Hennigan  
Donald F. Woods, Jr.

6  
7  
8 By: Donald F. Woods, Jr.  
9

10 Attorneys for the Roman Catholic Archbishop of  
11 Los Angeles, a corporation sole, also known as  
12 the Archdiocese of Los Angeles  
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Hennigan, Bennett & Layman  
Los Angeles, California

Verification

I, Monsignor Craig A. Cox, declare:

1. My business address is Monsignor Craig A. Cox, Archdiocese of Los Angeles, Vicar for Clergy Office, Archdiocese Catholic Center, 3424 Wilshire Boulevard, 11th Floor, Los Angeles, California 90010-2241.

2. I am and have been since January 2001 the Vicar for Clergy for The Roman Catholic Archbishop of Los Angeles, a corporation sole, also known as the Archdiocese of Los Angeles (the "Archdiocese").

3. I am a custodian of records for the clergy files of the Archdiocese

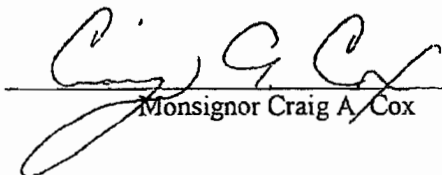
4. I am delivering herewith true copies of the documents described in the subpoena to the attorneys listed in the proof of service.

5. These records were found in the files of the Archdiocese.

6. The document, bates number ALLI 00003, did not copy well, despite numerous attempts to change the level of darkness of the copy. Therefore, in February, 2005, I prepared a transcript, taken from the original document, bates number ALLI 00003. The transcription has the bates number ALLI 00037, and is being provided as a courtesy. Bates number ALLI 00037 is an exact transcription of the document with bates number ALLI 0003 and I hereby verify its accuracy.

Executed this 22<sup>nd</sup> day of March, 2005, at Los Angeles, California.

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

  
Monsignor Craig A. Cox

PROOF OF SERVICE

I declare as follows:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 601 South Figueroa Street, Suite 3300, Los Angeles, California 90017. On March 22, 2005, I served the foregoing document described as **Response to Deposition Subpoena for Business Records** on the interested parties in this action as follows:

- ☐ by transmitting via facsimile the documents listed above to the fax number set fourth below on this date. This transmission was reported as complete without error by a transmission report issued by the facsimile machine upon which the said transmission was made immediately following the transmission. A true and correct copy of the said transmission is attached hereto and incorporated herein by this reference.
- ☒ by placing the document listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.
- ☐ by placing the document listed above in a sealed envelope and affixing a pre-paid air bill, and causing the envelope to be delivered as set forth below.

Raymond P. Boucher  
Anthony M. DeMarco  
Kiesel Boucher & Larson LLP  
8648 Wilshire Boulevard  
Beverly Hills, California 90211-2910

Carey Johnson  
Stamner, McKnight, Barnum & Bailey  
2540 West Shaw Lane, Suite 110  
Fresno, California 93711

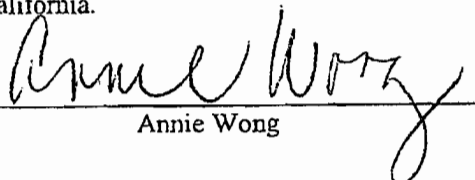
- ☐ by personally delivering the document listed above to the persons at the address set forth below.

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

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

☐ I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on March 22, 2005, at Los Angeles, California.

  
Annie Wong



ARCHDIOCESE OF LOS ANGELES  
1531 WEST NINTH STREET  
LOS ANGELES 15, CALIFORNIA  
DUUnkirk 8-8101

November 18, 1963

His Excellency  
Most Reverend Bernard T. Espelage, OFM, D.D.  
The Chancery Office  
P.O. Box 1338  
Gallup, New Mexico

Your Excellency:

This office has received an enquiry concerning  
Reverend ANGELICO FLAMM, OFM, who we understand is assigned  
to the Navajo Indian Reservation in New Mexico.

Our purpose is simply to confirm this information.  
Any assistance that your office might be in this regard will  
be deeply appreciated.

With sentiments of profound esteem, I am

Sincerely yours,

Reverend John B. Thom  
Assistant Secretary

Gallup, N.M. November 21, 1963.

Dear Rev. Father:- We have no idea of who this Rev. ANGELICO FLAMM IS AND  
he certainly is not work on the Navaho Indian Reservation and we have never  
hear of him<sup>ag</sup> Sorry at being unable to help you.

+Bernard T Espelage OFM  
Bishop of Gallup.

ALLI 00001

ST. JUDE MISSION

P. O. Box 258

TUBA CITY, ARIZONA

November 22, 1963

Rt. Rev. Msgr. Joseph J. Truxaw  
Church of the Immaculate Conception  
1433 W. Ninth Street  
Los Angeles 15, California

Dear Monsignor:

Your note was forwarded to me in yesterday's mail. The same mail brought a letter from Father Allison. In his letter Father told of a request for Mass stipends sent to him by Father Flann of Window Rock, Arizona. He said he procured \$50 in Mass stipends from you and sent the money to Father Flann. He wonders if I have received the money, because you, Monsignor, want verification of the fact.

Unfortunately, I must inform you that I am in complete ignorance of any such transaction. I sent no letter to Father Allison; I did not know his address until yesterday. Incidentally, his letter to me in yesterday's mail was quite correctly addressed.

Last evening I phoned my superior at St. Michael's Mission (three miles from Window Rock), in the hope that he might know something of this matter. He said our Bishop was recently asked for information about a Father Angelico Flamm, O.F.M. Apparently the request came from you or your Chancery Office. I fear the name is fictitious, Monsignor.

The whole situation smacks of deception--somewhere along the line. Let me offer this bit of information; perhaps you are not aware of it. Father Allison was here in the diocese for a year or so, perhaps three years ago. He was assistant to Father James Lindenmeyer, Our Lady of Guadalupe Church, 224 S. Kendrick St., Flagstaff, Arizona. Father Allison's record there was not, as I have heard from the Padres, commendable--though I am not cognizant of very many details. Father Lindenmeyer can fill you in, if you wish to write to him.

If I am speaking out of turn, I shall ask Father Allison's forgiveness. I do hope you will soon solve the present difficulty.

Sincerely in Christ,

*Father Flann O'Neil, O.F.M.*

Father Flann O'Neil, O.F.M.

ALLI 00002

Eparchy of Our Lady of Guadalupe

224 SOUTH KENDRICK  
FLAGSTAFF, ARIZONA

November 20, 1955

Right Reverend Joseph Francis  
Immaculate Conception Church  
1435 West Ninth  
Los Angeles, California

Right Reverend and Dear Monsignor:

This is in answer to your letter of November 15th which arrived in this morning's mail.

Father William Allison is well known to me since he was an assistant in this parish for some time. He recently was in charge of the Roman Club work and in that capacity handled considerable bills. The money given him by the diocese for the Roman Club was not accounted for; many personal bills amounting to several thousand dollars were left unpaid and collectors are still in touch with him. I had no indication whatsoever that he was taking anything from the collection. He is a man of very talents not the least of which is his preaching ability, and his personable appeal.

It is my own opinion that his financial difficulties arise from a greater difficulty, and that I am, regrettably, - honorably, - like you, I too was concerned about his situation but never could I prove anything; never did I receive any complaint during his stay here. In fact he did great work with the Roman Club and accomplished a great deal for the parish. Since he left, however, three young men in this parish have told me of incidents involving him and I have no reason whatsoever to doubt their word. The one boy remained away from the Sacraments for a long time due to embarrassment and confusion. Monsignor, this man needs help but in my opinion the place is not in a parish. I do not understand how he can go from one place to another and so easily be given a position.

I would request that all this be kept in the strictest confidence, just at the seat of the Confessional. I do not want Fr. Allison to know about this for I do not wish to be involved in such matters again. He refuses to return to Via Crucis. Now, perhaps, can think of something else. I pray that he can be helped. In my opinion the only reason he has not been helped previously is because he refused the help.

In your letter you mentioned that you had a surplus of lanes stipends. One of the parishes here in town, St. Paul II, is in need of lanes and there are others in the diocese.

Should there be anything additional I can do, please do not hesitate to call on me.

Fraternally in Christ,  
*James Lindemann*  
Eparchial Vicar

ALLI 00003

ST. JUDE MISSION

P. O. Box 258

TUBA CITY, ARIZONA

November 22, 1963

Dear Father Allison,

Good to hear from you. Hope all is going well at your end.

Regarding the Mass stipends you sent to me, I fear I can give you no information--other than the fact that I have not received any from you. It is possible that someone used my name, though I hope not--because Mass stipends are of serious concern. Sorry I can give you nothing more definite on this.

Wintry weather moved in a few days ago. Flagstaff had its first snowfall today--two inches. Tonight our temperature here is 30.

Take care of yourself, Father. You are in my prayers. Remember me now and then in yours.

*Father Flann*

ALLI 00004



Church of the Immaculate Conception  
1433 West North Street  
Los Angeles 15

Nov 26<sup>th</sup>

Monsignor:

I received the attached letter in your absence and leave it here lest you arrive on my off day.

When no acknowledgment arrived I wrote Fr. Flann and the enclosed letter is the answer. It is the first time in my life I have ever sent intimations to anyone and will never do it again unless personally. In keeping with the law I will either assume the obligation of the masses or refund the money to the fund.

I have sent off a letter to a former friend of mine, who formerly managed the Ramada Inn in Flagstaff and, who for the past three years, has run an Indian Trading Store near the Window Rock Mission area, see if he can find out anything for me. He might run the post office there as so many store owners do in that area. I have delved into my mind trying to figure out who could have done this with so much information. The letter of request mentioned Fr. Lindenmeyer and Mary Wynn of Flagstaff. Mary Wynn is the only one in Flag who has my immediate address, and from whom the address was supposed to have been received. The letter of request was headed Catholic Indian Mission, Window Rock, Arizona to which, of course, I sent the answer.

Bill  
(Allison)

Church of Our Lady of Guadalupe

224 SOUTH KENDRICK  
FLAGSTAFF, ARIZONA

March 23, 1967

Rev. Fr. [illegible]  
[illegible]  
[illegible]

Dear Fr. [illegible]:

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

James Lindenberg

Ref. William Allison

Confidential

— *Agreement extended*  
*for Wm. Allison*  
*to Oct. 31st*

*OK Best*  
*supplies at a time Sept. 26*