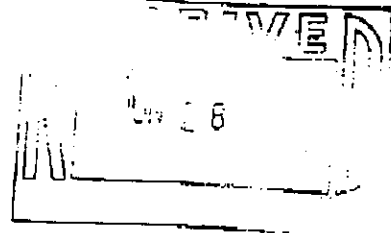


ECKERT SEAMANS CHERIN & MELLOTT

June 23, 1995

Frederic J. Torphy, Esquire
Durfee Attleboro Bank Building
Ten North Main Street
Post Office Box 608
Fall River, MA 02722



Re: Sexual Molestation of [REDACTED] by Father Edward Paquette

Dear Fred:

This firm represents [REDACTED]. Mr. [REDACTED] informs us that he was sexually abused by Father Edward Paquette ("Fr. Paquette") a priest of the Diocese of Fall River ("Diocese"). Mr. [REDACTED] has suffered emotional, psychological and physical anguish in the years since the commencement of the abuse, which form the basis for his legal claims against Fr. Paquette and the Diocese as the facts below will demonstrate.

Fr. Paquette sexually abused Mr. [REDACTED] on a weekly basis for nearly three years beginning in approximately early 1960 and ending in late 1962. In or about the Spring of 1960 when Mr. [REDACTED] was 10 years old, Fr. Paquette arrived at St. Killian's Parish in New Bedford, Massachusetts ("St. Killian") where Mr. [REDACTED] and his family were parishioners. Although Mr. [REDACTED] had been told by Father Sharpe (the priest who preceded Fr. Paquette at St. Killian's) that Mr. [REDACTED] could not become an altar boy until Mr. [REDACTED] reached the fifth grade, Fr. Paquette allowed Mr. [REDACTED] to become an altar boy immediately. Mr. [REDACTED] served Mass at St. Killian's frequently, serving under the leadership of Fr. Paquette. During Mr. [REDACTED]'s tenure as an altar boy, Fr. Paquette befriended Mr. [REDACTED], allowing Mr. [REDACTED] special privileges and offering Mr. [REDACTED] guidance and kindness. From a young age, Mr. [REDACTED] had been taught to revere priests and Fr. Paquette was no exception. Over time, however, Mr. [REDACTED] came to not only exalt Fr. Paquette but to trust him implicitly. Eventually, Fr. Paquette would destroy this trust by using his status as a priest and honored servant of the Catholic church and community to sexually exploit Mr. [REDACTED].

Several months after befriending Mr. [REDACTED], Fr. Paquette invited Mr. [REDACTED] to spend the weekend with him at Fr. Paquette's family home in Westfield, Massachusetts. Mr. [REDACTED] recalls that they arrived late at night and immediately retired to separate bedrooms. Mr. [REDACTED] also recalls that Fr. Paquette's parents were not at home. Mr. [REDACTED] awoke the next morning to find Fr. Paquette, wearing only a T-shirt, in Mr. [REDACTED]'s bed, kissing Mr. [REDACTED] and fondling Mr. [REDACTED]'s genitals. Fr. Paquette coerced Mr. [REDACTED] to rub Fr. Paquette's penis and instructed Mr. [REDACTED] on how to masturbate Fr. Paquette. During this incident, Fr. Paquette told Mr. [REDACTED] to keep his eyes closed.

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Following this incident, Fr. Paquette repeatedly sexually abused [REDACTED] in St. Kilian's rectory and vestibule, Fr. Paquette's car and at a movie theater in New Bedford, Massachusetts. On one occasion, Fr. Paquette took [REDACTED] out of his fifth grade class at St. Kilian's Elementary School, to sexually assault [REDACTED] in Fr. Paquette's car. On most occasions, Fr. Paquette would coerce [REDACTED] to masturbate Fr. Paquette and Fr. Paquette would kiss and fondle [REDACTED]. During the abuse, Fr. Paquette would tell [REDACTED] that Fr. Paquette had a physical problem which could only be helped by [REDACTED] sharing his body warmth with Fr. Paquette. Fr. Paquette also told [REDACTED] that Fr. Paquette would lose his job if anyone found out that he had the physical problem.

Clearly, Fr. Paquette abused his power as a revered member of the religious community to exploit [REDACTED]'s trust and vulnerability in order to satisfy his own wanton desires. [REDACTED] has been significantly damaged by Fr. Paquette's violent and abusive acts, as indicated most tangibly by his inability to form trusting and lasting intimate relationships. This is exemplified most tragically by the fact that until last year, [REDACTED] was unable to tell anyone, not even his wife, of the abuse he suffered at the hands of Fr. Paquette. The shame that [REDACTED] attaches to the memories of Fr. Paquette's sexual abuse has forced [REDACTED] to keep the fact of the abuse from those closest to him. This shame has been present in [REDACTED] life for nearly 35 years.

Moreover, since the molestation, Mr. [REDACTED] has also experienced paranoia, loss of faith, depression, low or no self-esteem, an inability to experience his emotions and serious and detrimental effects on his relationship with his wife, Mr. [REDACTED] most valued lifetime relationship. The strain on this spousal relationship has been stressful and upsetting to both Mr. [REDACTED] and his wife. Most significant to Mr. [REDACTED] is the fact that he was a religious child and since the abuse he has been adrift in a world void of spirituality.

Although these injuries have haunted Mr. [REDACTED] throughout his life, it was not until approximately the Spring of 1994, while in therapy for depression, that Mr. [REDACTED] began to realize the causal connection between the sexual abuse he was forced to endure as a child, and the profound and pervasive injury to his life.

Mr. [REDACTED] has been seriously and irreparably damaged by the sexual abuse perpetrated by Fr. Paquette. Mr. [REDACTED] demands compensation for his injuries which are causally related to the sexual abuse perpetrated by Fr. Paquette and he is willing to settle all of his claims for the amount of \$500,000.00, an amount well within the range of settlement for this type of case.

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Additionally, [REDACTED] demands that the Diocese establish a written policy requiring all accusations of clerical sexual abuse of a minor to be brought to the attention of the local law enforcement authorities for investigation. Mr. [REDACTED] also demands that the Diocese notify each parish where Fr. Paquette served that Fr. Paquette is a pedophile and offer assistance to any and all victims that may come forward.

I have enclosed Tolling Agreements which I request that you execute as soon as possible. I look forward to hearing from you about this matter.

Very truly yours,

Michael P. Flammia

/bba
Enclosures

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