

At family reunions from 1987 - 1990, Plaintiff continued to see Father Janssen and felt sick about seeing him at that time. He felt sick during these times, but did not consider getting help from somebody because he did not want to bring the abuse up and bring up more problems. (Transcript pp. 59 - 60.)

b. Plaintiff did not like to think about what had happened to him, but there were many times that he could not help to think about it, and felt angry, frustrated, and scared. (Transcript p. 61.)

c. "Over various periods of time in the last thirty years, [Plaintiff has] regularly had these feelings of anger, frustration, sickness" about the abuse. (Transcript p. 62.)

d. Plaintiff had a lot of guilt during high school about the abuse that he had suffered. (Transcript p. 73.)

e. It bothered Plaintiff to see James Janssen as the priest at Sugar Creek. (Transcript p. 78.)

f. Plaintiff told James Janssen to stop the abuse because he knew what Janssen was doing was wrong and believed that what James Janssen was doing to Plaintiff was injuring Plaintiff as a person. (Transcript p. 80.)

g. Plaintiff's feelings of sickness, anger, and frustration grew worse as he got older in the years 1977 to 1979. Plaintiff has always understood the seriousness of what Father Janssen did to him. (Transcript p. 85.)

h. Plaintiff had the same types of feelings about being abused by Father Bass that he did about Father Janssen. He felt horrible, and has remembered the sickness and feeling of being harmed from the time he was abused until the date of his deposition. He has always understood the seriousness of the abuse by Father Bass. (Transcript p. 106.)

i. Plaintiff has had the feeling of sadness, sickness and guilt feelings for all the years since the abuse. (Transcript p. 134.)

j. Plaintiff knew that the feelings of sickness and guilt were caused by Father Janssen and Father Bass's abuse. (Transcript pp. 141-42.)

k. Plaintiff did not report the abuse because he was afraid to and did not want the abuse to get out in the public because of the embarrassment to him and to his family. (Transcript p. 183.)

l. The last abuse occurred when Plaintiff was a senior in high school, in 1974. (Transcript p. 80)

8. Doe II did not file his Petition until September 25, 2003.

LANE & WATERMAN LLP

By Rand S. Wonio  
Rand S. Wonio 06080

By Mikkie R. Schiltz  
Mikkie R. Schiltz 17672

Attorneys for Defendant  
Diocese of Davenport

Of Counsel:  
LANE & WATERMAN LLP  
220 N. Main St., Ste. 600  
Davenport, IA 52801-1987  
Phone: (563) 324-3246  
FAX: (563) 324-1616  
E-mail: [rwonio@l-wlaw.com](mailto:rwonio@l-wlaw.com)

Copy to:

Craig A. Levien  
Betty, Neuman & McMahon  
600 Union Arcade Building  
111 E. Third Street  
Davenport, IA 52801  
563/326-4491  
563/326-4498 fax  
Attorney for Plaintiff

Jeffrey Anderson  
Patrick Noaker  
JEFF ANDERSON & ASSOCIATES  
E. 1000 First National Bank Bldg.  
St. Paul, MN 55101  
Attorneys for Plaintiff

Edward N. Wehr  
Wehr, Berger, Lane & Stevens  
900 Kahl Building

326 W. Third Street, Suite 900  
Davenport, IA 52801  
563/326-1000  
563/326-4701 fax  
Attorney for Defendant Janssen

Michael J. McCarthy  
McCarthy, Lammers & Hines  
701 Kahl Building  
Davenport IA 52801  
563/324-9117  
Attorney for Defendant Bass

Proof of Service

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on

7-15, 2004.

By: ☒ U.S. Mail ☐ Fax  
☐ Hand Delivered ☐ UPS  
☐ FedEx ☐ Other

Signature 