

FILED

IN THE IOWA DISTRICT COURT FOR SCOTT COUNTY

04 FEB -3 PM 3:35

JOHN DOE III,

Plaintiff,

vs.

FATHER JAMES JANSSEN, FATHER  
FRANCIS BASS, THEODORE ANTHONY  
GEERTS, and THE DIOCESE OF  
DAVENPORT,

Defendants.

Law No. 101428

CLERK OF DISTRICT COURT  
SCOTT COUNTY, IOWA

**DEFENDANT DIOCESE OF  
DAVENPORT'S STATEMENT OF  
UNDISPUTED FACTS**

Defendant Diocese of Davenport, by and through its attorneys, Lane & Waterman LLP,  
for its Statement of Undisputed Facts, states as follows:

1. Doe was born on March 8, 1952.
2. Doe alleges that beginning in 1964, he was sexually abused by Defendants Janssen, Bass, and Geerts.
3. Doe turned 18 years of age on March 8, 1970.
4. On or about July 22, 1998, Doe sent a letter to the Bishop of the Diocese of Davenport. See Plaintiff's Response to Defendant Diocese's Request for Admissions, attached as Exhibit A to the Brief in Support of the Diocese's Motion for Summary Judgment.
5. In that letter, Doe claims to have knowledge he was abused by Defendants Janssen, Bass and Geerts. See Exhibit A to Brief.
6. In that letter, Doe also acknowledges that the abuse occurred during the 1960's. See Exhibit A to Brief.
7. In that letter, Doe acknowledges having received "professional therapy." See Exhibit A to Brief.

8. Doe did not file his Petition until October 28, 2003.

LANE & WATERMAN LLP

By Rand S. Wonio  
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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

February 3, 2004.

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

Signature Elise L. James