

REQUEST NO. 39: You had sexual contacts with a brother of James Wells when that brother was a minor.

RESPONSE: This Request is objected to on relevancy grounds as it does not relate to Plaintiff in this case

REQUEST NO. 40: As a parish priest, you exert emotional control over minor members of the parish that look to you for educational and spiritual leadership.

RESPONSE: Denied since "emotional control" is not part of a priest's exertion

\* REQUEST NO. 41: As a parish priest, you hold yourself out as a devoutly religious holy man.

RESPONSE: Denied

\* REQUEST NO. 42: As a parish priest, you hold yourself out as a spiritual advisor to the minor members of the parish.

RESPONSE: Denied since minors do not generally come to a priest in an advisory role

