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he had never received the confidential letter of March 23, 1987.

#### **INTERROGATORY NO. 20:**

If Cardinal Rivera has had written communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole please identify to whom the written communication(s) were directed.

#### **RESPONSE TO INTERROGATORY NO. 20:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has received the following written communications from the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar, with the following persons:

- (a) Letter of January 27, 1987 from Cardinal Rivera to Cardinal Roger Mahony indicating that, for reasons of family and health, Fr. Aguilar desired to work for one year in Los Angeles.
- (b) Confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony and Vicar Curry explaining that Fr. Aguilar's departure from the Diocese of Tehuacan stemmed from a physical assault on Fr. Aguilar and that there were unproven accusations of homosexuality against Fr. Aguilar.
- (c) Letter of January 11, 1988 from Vicar Curry to Cardinal Rivera explaining that Fr.

  Aguilar had been accused of acting inappropriately towards children and that, as a result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.
- (d) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera knew of Fr. Aguilar's whereabouts, Cardinal Rivera urge Fr. Aguilar to return to California.
- (e) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting information as to Fr. Aguilar's relatives.
- (f) Confidential letter of March 17, 1988 from Cardinal Rivera to Cardinal Mahony

stating that Cardinal Rivera was unaware of Fr. Aguilar's whereabouts, providing information as to Fr. Aguilar's relatives and employment history, and referring Cardinal Mahony to the confidential letter of March 23, 1987.

(g) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that he had never received the confidential letter of March 23, 1987.

#### **INTERROGATORY NO. 21:**

Has Cardinal Rivera ever received a written communication(s) from The Roman Catholic Archbishop of Los Angeles, A Corporation Sole?

## **RESPONSE TO INTERROGATORY NO. 21:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon Cardinal Rivera. Cardinal Rivera further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has received written communications with the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

#### **INTERROGATORY NO. 22:**

If Cardinal Rivera has received a written communication(s) from The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, please identify the date(s) of the communication(s).

#### **RESPONSE TO INTERROGATORY NO. 22:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon Cardinal Rivera. Cardinal Rivera further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor

reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has received the following written communications from the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar, on the following dates:

- (a) Letter of January 11, 1988 from Vicar Thomas Curry of the Los Angeles Archdiocese to Cardinal Rivera explaining that Fr. Aguilar had been accused of acting inappropriately towards children and that, as a result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.
- (b) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera knew of Fr. Aguilar's whereabouts, Cardinal Rivera urge Fr. Aguilar to return to California.
- (c) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting information as to Fr. Aguilar's relatives.
- (d) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that Cardinal Mahony had never received the confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony.

#### **INTERROGATORY NO. 23:**

If Cardinal Rivera ever received a written communication(s) from The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, please identify the subject matter of the communication(s).

## **RESPONSE TO INTERROGATORY NO. 23:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon Cardinal Rivera. Cardinal Rivera further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without

waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has received the following written communications from the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar, on the following subjects:

- (a) Letter of January 11, 1988 from Vicar Thomas Curry of the Los Angeles Archdiocese to Cardinal Rivera explaining that Fr. Aguilar had been accused of acting inappropriately towards children and that, as a result, his permission to serve in the Los Angeles Archdiocese had been withdrawn.
- (b) Letter of February 23, 1988 from Vicar Curry to Cardinal Rivera enclosing a Los Angeles Times article pertaining to Fr. Aguilar and requesting that, if Cardinal Rivera knew of Fr. Aguilar's whereabouts, Cardinal Rivera urge Fr. Aguilar to return to California.
- (c) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting information as to Fr. Aguilar's relatives.
- (d) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that Cardinal Mahony had never received the confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony.

#### **INTERROGATORY NO. 24:**

Has Cardinal Rivera ever received a written communication(s) from Cardinal Roger Mahony?

#### **RESPONSE TO INTERROGATORY NO. 24:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon Cardinal Rivera. Cardinal Rivera further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has received written communications from Cardinal Mahony regarding

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**INTERROGATORY NO. 25:** 

If Cardinal Rivera has received a written communication(s) from Cardinal Roger Mahony, please identify the date(s) of each communication(s).

## **RESPONSE TO INTERROGATORY NO. 25:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon Cardinal Rivera. Cardinal Rivera further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has received the following written communications from Cardinal Mahony regarding Fr. Aguilar, on the following dates:

- (a) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting information as to Fr. Aguilar's relatives.
- (b) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that Cardinal Mahony had never received the confidential letter of March 23, 1987 from Cardinal Rivera to Cardinal Mahony.

## **INTERROGATORY NO. 26:**

If Cardinal Rivera ever received a written communication(s) from Cardinal Roger Mahony, please identify the subject matter of the communication(s).

## **RESPONSE TO INTERROGATORY NO. 26:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because it is overly broad, unduly burdensome and oppressive, and it imposes an unreasonable burden and expense upon Cardinal Rivera. Cardinal Rivera further objects to this Interrogatory because it seeks information that is neither relevant to the subject matter involved in this action nor

1	reasonably calculated to lead to the discovery of admissible evidence. Subject to and without
2	waiving his objections, Cardinal Rivera responds as follows:
3	Cardinal Rivera has received the following written communications from Cardinal
4	Mahony regarding Fr. Aguilar, on the following subjects:
5	(a) Letter of March 4, 1988 from Cardinal Mahony to Cardinal Rivera requesting
6	information as to Fr. Aguilar's relatives.
7	(b) Letter of March 30, 1988 from Cardinal Mahony to Cardinal Rivera and stating that
8	Cardinal Mahony had never received the confidential letter of March 23, 1987 from
9	Cardinal Rivera to Cardinal Mahony.
10	INTERROGATORY NO. 27:
ļ	Has Cardinal Rivera ever had verbal communication(s) with The Roman Catholic
11	Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar?
12	RESPONSE TO INTERROGATORY NO. 27:
13	Cardinal Rivera incorporates by reference his Preliminary Statement and General
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15	Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera
16	responds as follows:
17	Cardinal Rivera has had no verbal communications with the Roman Catholic Archbishop
18	of Los Angeles regarding Fr. Aguilar.
19	INTERROGATORY NO. 28:
20	If Cardinal Rivera has had a verbal communication(s) with The Roman Catholic
21	Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please identify the
22	date(s) of the communication(s).
23	RESPONSE TO INTERROGATORY NO. 28:
24	Cardinal Rivera incorporates by reference his Preliminary Statement and General
25	Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera
26	responds as follows:
27	Cardinal Rivera has had no verbal communications with the Roman Catholic Archbishop
28	of Los Angeles regarding Fr. Aguilar.

#### **INTERROGATORY NO. 29:**

If Cardinal Rivera has had a verbal communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please identify the name of the individual(s) with whom Cardinal Rivera has had verbal communication(s).

## **RESPONSE TO INTERROGATORY NO. 29:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has had no verbal communications with the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

## **INTERROGATORY NO. 30:**

If Cardinal Rivera ever had a verbal communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please identify the subject matter of the communication(s).

## **RESPONSE TO INTERROGATORY NO. 30:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has had no verbal communications with the Roman Catholic Archbishop of Los Angeles regarding Fr. Aguilar.

#### **INTERROGATORY NO. 31:**

If Cardinal Rivera ever had a verbal communication(s) with The Roman Catholic Archbishop of Los Angeles, A Corporation Sole, regarding Nicholas Aguilar, please state whether notes are in existence which document the subject matter of the communication(s).

#### **RESPONSE TO INTERROGATORY NO. 31:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

1	Cardinal Rivera has had no verbal communications with the Roman Catholic Archbishop
2	of Los Angeles regarding Fr. Aguilar.
3	INTERROGATORY NO. 32:
4	Has Cardinal Rivera ever had verbal communication(s) with Cardinal Roger Mahony,
5	regarding Nicholas Aguilar?
6	RESPONSE TO INTERROGATORY NO. 32:
7	Cardinal Rivera incorporates by reference his Preliminary Statement and General
8	Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera
9	responds as follows:
10	Cardinal Rivera has had no verbal communications with Cardinal Roger Mahony
11	regarding Fr. Aguilar.
12	INTERROGATORY NO. 33:
13	If Cardinal Rivera has had a verbal communication(s) with Cardinal Roger Mahony,
14	regarding Nicholas Aguilar, please identify the date(s) of the communication(s).
15	RESPONSE TO INTERROGATORY NO. 33:
16	Cardinal Rivera incorporates by reference his Preliminary Statement and General
17	Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera
18	responds as follows:
19	Cardinal Rivera has had no verbal communications with Cardinal Roger Mahony
20	regarding Fr. Aguilar.
21	INTERROGATORY NO. 34:
22	If Cardinal Rivera has had a verbal communication(s) with Cardinal Roger Mahony,
23	regarding Nicholas Aguilar, please identify the subject matter of the communication(s).
24	RESPONSE TO INTERROGATORY NO. 34:
25	Cardinal Rivera incorporates by reference his Preliminary Statement and General
26	Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera
27	responds as follows:
28	Cardinal Rivera has had no verbal communications with Cardinal Roger Mahony

regarding Fr. Aguilar.

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#### **INTERROGATORY NO. 35:**

If Cardinal Rivera has had a verbal communication(s) with Cardinal Roger Mahony, regarding Nicholas Aguilar, please state whether there are any writings which document the subject matter of the communication(s).

#### **RESPONSE TO INTERROGATORY NO. 35:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Subject to and without waiving his objections, Cardinal Rivera responds as follows:

Cardinal Rivera has had no verbal communications with Cardinal Roger Mahony regarding Fr. Aguilar.

#### **INTERROGATORY NO. 36:**

Has Cardinal Rivera every had any conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed.

#### **RESPONSE TO INTERROGATORY NO. 36:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

#### **INTERROGATORY NO. 37:**

If Cardinal Rivera has had a conversation with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed, please describe the date of the conversation(s).

#### **RESPONSE TO INTERROGATORY NO. 37:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the same

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grounds.

### **INTERROGATORY NO. 38:**

If Cardinal Rivera has had a conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed, please describe the substance of the conversation.

## **RESPONSE TO INTERROGATORY NO. 38:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

## **INTERROGATORY NO. 39:**

If Cardinal Rivera has had a conversation(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed, please state whether there are any writings which document the subject matter of the conversation(s).

#### **RESPONSE TO INTERROGATORY NO. 39:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

## **INTERROGATORY NO. 40:**

Has Cardinal Rivera had any written communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed.

## **RESPONSE TO INTERROGATORY NO. 40:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General

Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff
has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of

the California Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

#### **INTERROGATORY NO. 41:**

If Cardinal Rivera has had written communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed, please describe the date of the communication(s).

## **RESPONSE TO INTERROGATORY NO. 41:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

## **INTERROGATORY NO. 42:**

If Cardinal Rivera has had written communication(s) with Nicholas Aguilar in which the subject of Aguilar's transfer to California was discussed, please describe the substance of the communication(s).

#### **RESPONSE TO INTERROGATORY NO. 42:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of the California Code of Civil Procedure and declines to respond to this Interrogatory on the same grounds.

#### **INTERROGATORY NO. 43:**

Does Cardinal Rivera own any property in California, United States of America?

## **RESPONSE TO INTERROGATORY NO. 43:**

Cardinal Rivera incorporates by reference his Preliminary Statement and General

Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff
has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of

1	the California Code of Civil Procedure and declines to respond to this Interrogatory on the same
2	grounds.
3	INTERROGATORY NO. 44:
4	If Cardinal Rivera does own property in California, United States of America, please
5	identify the property.
6	RESPONSE TO INTERROGATORY NO. 44:
7	Cardinal Rivera incorporates by reference his Preliminary Statement and General
8	Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff
9	has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of
10	the California Code of Civil Procedure and declines to respond to this Interrogatory on the same
11	grounds.
12	INTERROGATORY NO. 45:
13	If Cardinal Rivera does own property in California, United States of America, please
14	state the date the property was acquired.
15	RESPONSE TO INTERROGATORY NO. 45:
16	Cardinal Rivera incorporates by reference his Preliminary Statement and General
17	Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff
18	has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of
19	the California Code of Civil Procedure and declines to respond to this Interrogatory on the same
20	grounds.
21	<u>INTERROGATORY NO. 46</u> :
22	If Cardinal Rivera does own property in California, United States of America, please
23	describe the nature of use of the property.
24	RESPONSE TO INTERROGATORY NO. 46:
25	Cardinal Rivera incorporates by reference his Preliminary Statement and General
26	Objections set forth above. Cardinal Rivera further objects to this Interrogatory because Plaintiff
27	has exceeded the maximum number of special interrogatories authorized by Section 2030.030 of
28	the California Code of Civil Procedure and declines to respond to this Interrogatory on the same
	28 CARDINAL RIVERA'S RESPONSES TO PLAINTIFF'S INTERROGATORIES; CASE NO. BC358718

1	grounds.		
2			
3	Dated: May 18, 2007		MAYER, BROWN, ROWE & MAW LLP
4			MICHAEL L. CYPERS STEVEN R. SELSBERG
. 5			EVAN M. WOOTEN
6			By GMMMMMM
7			By: WWWW Evan M. Wooten
8			Attorneys for Defendants Appearing Specially CARDINAL NORBERTO RIVERA AND THE
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## **VERIFICATION**

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

Dated: 05 - 07 , 2007

By: Cardinal Norberto Rivera Carerra

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I, Haewon Park, declare:

I am employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 350 South Grand Avenue, 25th Floor, Los Angeles, California 90071-1503. On May 18, 2007, I served a copy of the within document(s):

# DEFENDANT CARDINAL NORBERTO RIVERA'S RESPONSES TO PLAINTIFF'S INTERROGATORIES REGARDING JURISDICTION

by transmitting via facsimile the document(s) listed above to the fax number(s forth below on this date before 5:00 p.m.	s) set
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fully prepaid, in the United States mail at Los Angeles, California addressed as a forth below.									
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by placing the document(s) li pre-paid air bill, and causing					
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by personally delivering the document(s) listed a	above to the person(s)	at tl	10
 address(es) set forth below.	•		

Please see attached service list.

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 postage 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.

Executed on May 18, 2007, at Los Angeles, California.

Haewon Park

#### SERVICE LIST

	•
1	\$
2	Lawrence E. Drivon, Esq.
3	David E. Drivon, Esq. Robert T. Waters, Esq.
4	The Drivon Law Firm 215 N. San Joaquin Street
5	Stockton, CA 95202 Phone: (209) 644-1234 Fax: (209) 463-7668
6	
7	Martin D. Gross, Esq. Law Offices of Martin D. Gross
8	2001 Wilshire Blvd., Suite 205 Santa Monica, CA 90403
9	Phone: (310) 453-8320 Fax: (310) 861-1359
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Drivon, Esq. Michael G. Finnegan, Esq. Jeff Anderson & Associates von, Esq. aters, Esq. E-1000 First National Bank Bldg. aw Firm 332 Minnesota Street oaquin Street St. Paul, Minnesota 55101 Phone: (651) 227-9990 95202 644-1234 Fax: (651) 297-6543 63-7668

> J. Michael Hennigan, Esq. Lee W. Potts, Esq. Hennigan, Bennett & Dorman, LLP 865 South Figueroa St. Ste. 2900 Los Angeles, CA 90017-5708 Phone: (213) 694-1200 Fax: (213) 694-1234