

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
2 IN AND FOR THE COUNTY OF SAN FRANCISCO  
3 UNLIMITED JURISDICTION

4 ---oOo---

5 JOHN DOE, an incompetent )  
6 person by and through his )  
Guardian Ad Litem, WILLIAM )  
7 B. HIRSCH, )

8 Plaintiff, )

9 vs. ) No. CGC-06-452168

10 THE GREEK ORTHODOX )  
METROPOLIS OF SAN FRANCISCO, )  
11 a nonprofit corporation, FR. )  
MICHAEL RYMER and ROES 1-10, )  
12 inclusive, )

13 Defendants. )

14 )  
15 )  
16 ---oOo---

17 )  
18 DEPOSITION OF )  
19 METROPOLITAN GERASIMOS )  
VOLUME 1 )

20 Thursday, November 1, 2007

21 )  
22 )  
23 )  
24 )  
25 REPORTED BY: JOHN P. SQUIRES, CMR, CRP  
CSR No. 2001

1 'rape', close quote. Do you see that?

2 A. Yes.

3 MS. HARTLEY: Object to the extent it calls  
4 for speculation on the part of the witness.

5 MR. GROSS: Q. You understand that in this  
6 letter Father Schroeder concludes that, as he says in  
7 point 3, "Their relationship was therefore one of  
8 victimization and not a consensual sexual  
9 relationship"? Is that how you understand this  
10 letter?

11 MS. HARTLEY: Lacks foundation, calls for  
12 speculation on the part of the witness, and  
13 misinterprets what the letter says. The question is  
14 also vague and ambiguous.

15 THE WITNESS: That is his response. That's  
16 his opinion.

17 MR. GROSS: Q. So your opinion in reading  
18 the letter is that Father Schroeder concluded the  
19 relationship was one of victimization and not a  
20 consensual sexual relationship; is that correct?

21 MS. HARTLEY: Same objection.

22 THE WITNESS: No, that is not my conclusion.  
23 Because Father Schroeder wrote it, that doesn't mean  
24 that I am adopting it.

25 MR. GROSS: Q. I understand.

1 the part of the witness. It is misrepresenting the  
2 document.

3 You can answer the question.

4 THE WITNESS: That represents Father Paul  
5 Schroeder's personal opinion.

6 MR. GROSS: Q. So your understanding is  
7 that that is what Father Schroeder --

8 A. That's what he said.

9 MS. HARTLEY: Same objections.

10 MR. GROSS: Q. Let me finish the question.

11 A. Sorry.

12 Q. So your understanding from reading the  
13 letter is that Father Schroeder's personal opinion  
14 was that the relationship between Father Rymer and  
15 ██████████ was one of victimization and not a  
16 consensual sexual relationship; is that correct?

17 MS. HARTLEY: Same objections.

18 THE WITNESS: Yes.

19 MS. HARTLEY: We're going to need to quit  
20 for the day.

21 MR. GROSS: Hold on one moment.

22 (Off the record)

23 MR. GROSS: May I have a few more minutes?  
24 I mean if you have to go, you have to go.

25 MS. HARTLEY: Do you have a few minutes if

1 But your understanding of the letter was  
2 that Father Schroeder concluded that the relationship  
3 between Father Rymer and ██████████ was one of  
4 victimization and not a consensual sexual  
5 relationship; is that correct?

6 A. No.

7 MS. HARTLEY: Lacks foundation, calls for  
8 speculation on the part of the witness and  
9 misinterprets the document.

10 THE WITNESS: It's not correct because, as I  
11 told you, the letter was read by me some time ago and  
12 I did not base my decisions or my discussion with  
13 Father Paul on this particular letter. I don't  
14 recall doing that.

15 MR. GROSS: Q. I'm asking you now as you  
16 read the letter.

17 A. Okay.

18 Q. As you read the letter, do you understand  
19 from reading the letter that Father Schroeder was  
20 concluding that the relationship -- as is said in  
21 point 3, that the relationship between Father Rymer  
22 and ██████████ was one of victimization and not a  
23 consensual sexual relationship?

24 MS. HARTLEY: The question is vague,  
25 ambiguous, lacks foundation, calls for speculation on

1 you call Father Earl now?

2 THE WITNESS: Yeah, we can have a few more  
3 minutes, until he comes in.

4 (Off the record)

5 MR. GROSS: Q. I show you what has been  
6 previously marked as Exhibit 13. It's a letter on  
7 the letterhead of the Monastery of St. John of San  
8 Francisco to Archbishop Demetrios of the Greek  
9 Orthodox Archdiocese in New York.

10 Have you seen this letter before?

11 A. No.

12 Q. Can you read it for a moment.

13 A. Okay.

14 Q. Now, you understand that the Monastery of  
15 St. John San Francisco is where Father Rymer is  
16 residing now?

17 A. Yes.

18 Q. Now, Father Rymer was defrocked by the Greek  
19 Orthodox Church; isn't that correct?

20 A. Yes.

21 Q. And in this letter the Monastery of St. John  
22 of San Francisco is requesting the Archdiocese of the  
23 Greek Orthodox Church to assist so that -- and I read  
24 from the next to last paragraph -- so that Father  
25 Rymer, quote, might retain priestly faculties to