COMMONWEALTH OF KENTUCKY
BOONE CIRCUIT COURT
CASE NO: 03-CI-181
JUDGE: JOHN POTTER

JOHN DOE, et al., PLAINTIFFS

vs.

ROMAN CATHOLIC DIOCESE OF COVINGTON, et al., DEFENDANTS

AFFIDAVIT OF THOMAS PATRICK DOYLE

STATE OF COLORADO)
) ss:
COUNTY OF DENVER)

1. My name is Thomas Patrick Doyle, I reside in Vienna, Virginia. I am a Catholic priest and a canon lawyer. I have served as a consultant and expert witness in the matter of John Doe et al vs. the Catholic Diocese of Covington, et al. On January 9 I appeared before the court on behalf of the plaintiffs to testify in favor of the settlement agreed upon by plaintiffs and defendants in this case.

2. I have worked closely with the attorneys representing the plaintiffs from the early stages of this case. I have also met with and spent significant periods of time with many of the members of the class.

3. I have had extensive experience working with the victims of Catholic clergy sexual abuse. My experience spans more than twenty years and includes acting as a consultant and court expert in several hundred cases throughout the United States, In Ireland, the United Kingdom, Canada and Australia. Most important however is the experience I have had in working directly with the victims of clergy sexual abuse. The common complaint of victims, young and old, is that the leadership of their Church either ignored them or manipulated them when they went forward with reports of clergy sexual abuse. It has been my experience that the attorneys for the victims often fill a role which they hardly expected and that is providing therapeutic or emotional relief to the clients.

4. In this particular case the plaintiff attorneys had to interact with almost 400 hundred men and women who had been sexually abused in the past by Catholic clerics. They also faced the daunting task of trying to find other victims who had not come forward.

5. In this particular case it is my opinion, based on my experience and my involvement with this case, that the attorneys went "above and beyond the call of duty" in their contacts with the victims. They were consistently compassionate and personal. They maintained regular and detailed contact on the progress of the case. Such contact, though perhaps not absolutely necessary for the actual progress of the case, was certainly essential in creating, maintaining and building the trust existed with the clients. I was most impressed by the depth of understanding exhibited by the attorneys into the subtle dynamics of Catholic clergy sexual abuse. To attain this required patient listening. To sustain it required true dedication to the overall welfare of the clients.

6. The amount of time and effort that was expended by the plaintiff's attorneys in this case was monumental and extended beyond the basic exercise of their legal expertise. They maintained extensive personal contact with the clients. They went through an exhaustive process to search out other victims of sexual abuse so as to offer them the possibility of assistance and judicial relief.

7. The clients have been aware from the outset that the attorneys would request that a certain percentage of the settlement would be allotted as attorneys' fees. In light of the amount of time and effort put forth by the attorneys, the percentage requested certainly seems just and equitable. Also, in my interactions with the clients I have not heard any question or complaint about the fees to be requested in return for the attorney's services.

8. In my experience in church sexual abuse cases throughout the United States and abroad, the fee award of 30% is well within the range of fees awarded by the courts and is in fact lower than many of the fee awards of which I am aware.

FURTHER AFFIANT SAYETH NAUGHT.

Thomas P. Doyle

Sworn to and subscribed to before me this 13 day of February 2006.

Notary Public

My Commission Expires:

My Commission Expires
10/14/2008