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Jeffrey R. Anderson *^{IL}WCo
Patrick W. Noaker ^{MO}
Kathleen O'Connor
Michael G. Finnegan ^{CA}

January 24, 2008

VIA FAX

Jay Franke
Burke, Warren, MacKay & Serritella
330 N. Wabash
22nd Floor
Chicago, IL 60611-3607

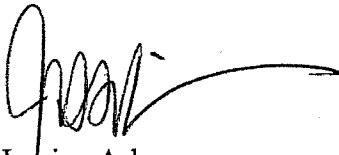
RE: Documents for Cardinal George deposition

Dear Mr. Franke:

As we discussed earlier in the week, I am sending to you the bates stamp numbers for documents we need in advance of Wednesday's deposition of Cardinal George. The attached lists outline the documents needed from the files of Donald Ryniecki, Joseph Steel, Ken Ruge, and Robert Becker.

As we agreed, please provide these copies no later than Monday, January 28.

Sincerely,



Jessica Arbour
Paralegal
jessica@andersonadvocates.com

Enclosure

EX A

RUGE FILE

CB15

0025:
0053:
0063:
0118:
0119:

CB3

0003:
0059.
00100
00289
00306-310
0312
0314
0370
00490
00532
0533
0306-0310
0572- 0581

CB5

0060:
0062-63:
00110:
0111:
00114
0116
0119-0120
0414
0426
0437
0436
445
0536-0537
00541-543

CB6

0018:
0020:
0021:
0022:
0023:

0030:

RYNIECKI FILE

CB12

0002-3
004:
005:
006:
007:
009:
0010:
0011:
0012
0017
0019
0020
0026
0028:
0032:
0042-44:
0063

CB9

001:
005:
0020:
0021:
0022:
0024:

STEEL FILE

CB3

0142:

00145:

00147:

00157-161:

0172:

0191:

00192:

00199:

0223:

0234:

00236:

0237:

00242:

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00274

00282:

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00323-324:

00329-330:

0335:

00337:

00338:

0340:

00342:

00344:

0347:

00348:

00350:

00351:

0355:

0357:

00360-361:

00364:

00368:

00373:

00376:

00380:

0392:

0399:

0400

0402:

0403:

0406

0410

0413:

0416:

0417:

0421

00426-8

0433-4:

CB5

0178:

00187:

0224:

0228:

00235

CB6

00121-123

BECKER

CB12-00001-00010:
CB12-00011-00083
CB12-00093:
CB12-00097:
CB12-00161-00162,
00167:
CB12-00163-00166:
CB12-00168:
CB12-00170-171:
CB12-00172-00173:
CB12-00176-00177:
CB12-00178-00180:
CB12-00181:
CB12-00182:
CB12-00183:
CB12-00184:
CB12-00185:

CB15-00001:
CB15-00002:
CB15-00003:
00011:
00012:
00013:
00017:
00018-00023:
00024-00029:
00040:

CB3-00001-0002:
CB3-00003-0007:
CB3-00008-0009:
CB3-00010-00015
00016-00017:
00020-00021:
00094-00097:
00163-00165:
00169-00171
00216-00217:
00277:
00282-00284:
00287-00288:
00289:
00291-00292:

00321:
00346:
00348:
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00353:
00355:
00359-00362
00364
00365-00366:
00368:
00372:
00376-00378
00380-00382
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00385:
00388:
00391:
00397
00398
00399:
00401-00402
00403:
00404-00408:
00409-00413:
00417-00419:

CB5- 00118-00120:
00130-00133:
00137-00139:
00141-00142:
00163
00165:
00167-00169: .
00200:

BECKER

0396-400:

0432:

] CB 5

Confirmation Report - Memory Send

Time : Jan-24-2008 07:58pm
Tel line : 3122614565
Name : K P F P LLC

Job number : 639
Date : Jan-24 07:55pm
To : 913128407900
Document pages : 010
Start time : Jan-24 07:55pm
End time : Jan-24 07:58pm
Pages sent : 010
Status : OK

Job number : 639

*** SEND SUCCESSFUL ***

JEFF ANDERSON & ASSOCIATES, P.A.
1000 East First National Bank Building
332 Minnesota Street
St. Paul, Minnesota 55101
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Fax No. (651) 297-6543

NOTE: THIS FAX MAY CONTAIN PRIVILEGED AND CONFIDENTIAL INFORMATION.
IF YOU RECEIVE IT IN ERROR, PLEASE CALL US IMMEDIATELY AT THE NUMBER
ABOVE.

Date: January 24, 2008
To: Jay Franke (312) 840-7900
From: Jessica Arbour
Re: Archdiocese of Chicago documents

Number of Pages (including cover sheet): 10
Original will follow:
Original will not follow: ~~XX~~

MESSAGE:

JEFF ANDERSON & ASSOCIATES, P.A.

1000 East First National Bank Building

332 Minnesota Street

St. Paul, Minnesota 55101

(651) 227-9990

Fax No. (651) 297-6543

NOTE: THIS FAX MAY CONTAIN PRIVILEGED AND CONFIDENTIAL INFORMATION.
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Date: January 24, 2008

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Original will not follow: XX

MESSAGE:

BURKE, WARREN, MACKAY & SERRITELLA, P.C.

22ND FLOOR
330 NORTH WABASH AVENUE
CHICAGO, ILLINOIS 60611-3607
TELEPHONE (312) 840-7000
FACSIMILE (312) 840-7900
www.burkelaw.com

JANET RENDA
DIRECT DIAL NUMBER
(312) 840-7016
jrenda@burkelaw.com

January 29, 2008

Via Messenger

Ms. Jessica Arbour
c/o Kerns, Frost & Pearlman, L.L.C.
70 W. Madison Street, Suite 5350
Chicago, Illinois 60602

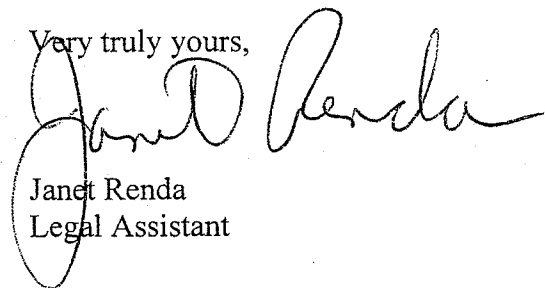
Re: Document Review

Dear Jessica:

Enclosed please find the documents that you requested after your review of the following files: Becker, Ruge, Ryniecki and Steel. There were some discrepancies in the documents that you requested in the Becker file. Several of the documents were either privilege or duplicates of other documents.

Please contact me if you have any questions.

Very truly yours,



Janet Renda
Legal Assistant

Enclosure
cc: J. Franke

Ex B

BURKE, WARREN, MACKAY & SERRITELLA, P.C.

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JAY R. FRANKE
DIRECT DIAL NUMBER: (312) 840-7092
E-MAIL: jfranke@burkelaw.com

January 29, 2008

VIA FACSIMILE

Mr. Jeffrey R. Anderson
Jeff Anderson & Associates
E-1000 First National Bank Building
332 Minnesota Street
St. Paul, MN 55101

Re: Archdiocese of Chicago: Production of Documents: McCormack "CB8" documents

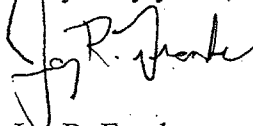
Dear Mr. Anderson:

Last week we provided to you (through Jessica Arbour) a complete set of the produced documents related to Rev. Daniel J. McCormack, comprising about 2,000 pages. The produced documents did not include McCormack's "seminary" files; as you know, we have routinely withheld seminary files with respect to all priests on the basis that they are educational records protected by statute. The seminary files for any priest may include materials from St. Mary of the Lake Seminary ("CB2"-labeled documents), Niles College/St. Joseph Seminary (CB8) and Quigley Preparatory Seminary (CB10).

In reviewing the McCormack files, we realized that we have "declassified" some documents in the McCormack CB8 file relating to McCormack's employment as an adult at St. Joseph seminary, since these are not educational records. These documents are enclosed with this letter; they comprise about 80 pages. They should be considered to be produced, as a supplement to the previous McCormack production, pursuant to the terms of the Mediation Agreement.

We apologize for this late notice. If you need any further explanation of the documents or our standards for production, please do not hesitate to call me.

Very truly yours,



Jay R. Franke

cc: Marc J. Pearlman (by Messenger)
John C. O'Malley

#459420

• RECEIVED 1:30 PM

EX C

BURKE, WARREN, MACKAY & SERRITELLA, P.C.

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JAY R. FRANKE
DIRECT DIAL NUMBER: (312) 840-7092
E-MAIL: jfranke@burkelaw.com

January 29, 2008

VIA FACSIMILE

Mr. Jeffrey R. Anderson
Jeff Anderson & Associates
E-1000 First National Bank Building
332 Minnesota Street
St. Paul, MN 55101

Re: Archdiocese of Chicago: Production of Documents: Supplemental Production

Dear Mr. Anderson:

Over the past months we have begun production of documents pursuant to the Mediation Agreement dated September 29, 2006, relating to certain priests of the Archdiocese of Chicago. Those priests with respect to whom at least some files have been produced are listed on the attached table, along with data explained below.

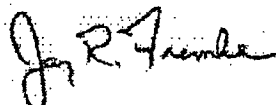
As discussed in earlier correspondence and with your representatives at the times of production, priest-related documents originate at several distinct locations within the Archdiocese, including Archdiocesan archives for priests who are long deceased or departed; In general, the source location of each document is shown in the document identification code assigned to each document. We have received the files from those locations over a necessarily extended period of time. Additional materials have (in the ordinary course of business) been added to those files over time.

In the interest of full disclosure at this point in time, we wish to make available to you additional documents that have accrued in the files that we have produced, since our initial receipt of those files from the Archdiocese. The sources of these documents are indicated on the attached table; as you can see, they aggregate about 200 pages.

Mr. Jeffrey R. Anderson
January 29, 2008
Page 2

I telephoned Mr. Pearlman and Ms. Arbour (on Monday, January 27) to advise them of the availability of these documents, and have spoken with Mr. Pearlman today.

Very truly yours,



Jay R. Franke

cc: Marc J. Pearlman (by facsimile)
John C. O'Malley

Mr. Jeffrey R. Anderson

January 29, 2008

Page 3

Supplementary Production, 1/25/2008			
	CB3	CB15	Note
BECKER	X		recent accumulation, <20 pg
BENNETT	X	X	recent accumulation, <20 pg
CRAIG	X		recent accumulation, <20 pg; CB5 file pending
HAGAN	X		<20 pg; CB5 file pending
KELLY			CB5 file pending
McCORMACK		X	CB3, CB5, CB8 supplements produced elsewhere. CB15, recent accumulation, <20 pg.
MADAY	X		recent accumulation, >100 pg
MAYER	X		recent accumulation <10 pg
OWENS		X	recent accumulation <10 pg; CB5 file pending
PRZYBYLO	X		<40 pg
RUGE	X		recent accumulation, <10 pg
RYNIECKI	X		recent accumulation, <10 pg
STEEL			none

BURKE, WARREN, MACKAY & SERRITELLA, P.C.

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CHICAGO, ILLINOIS 60611-3607
TELEPHONE: (312) 840-7000
FACSIMILE: (312) 840-7900

FAX TRANSMITTAL FORM

SEND TO: Marc Pearlman

FAX #: 312-261-4565

DATE/TIME: Tuesday, January 29, 2008

PHONE #:

NUMBER OF PAGES: 04

(Include Cover Sheet)

CLIENT #:

MATTER #:

SENT BY: Franke, Jay R.

COMMENTS: PLEASE DELIVER TO MARC J. PEARLMAN

CONFIDENTIALITY NOTE:

If you have received this fax and are not the addressed recipient, please notify the sender immediately by telephone and return the original message by mail. Thank you.

Please call our facsimile center at (312) 840-7030 if there is a problem with this fax transmission, or if you wish to confirm the transmission.