

* REQUEST NO. 61: Admit that complaints about sexual contact between you and minors under the age of majority were received by the Diocese of Davenport before January of 1967.

RESPONSE: Denied for lack of information

* REQUEST NO. 62: Admit that complaints about sexual contact between you and minors under the age of majority were received by you before January of 1967.

RESPONSE: Denied

REQUEST NO. 63: Admit that complaints about sexual contact between you and minors under the age of majority were received by other priests at the Diocese of Davenport before January of 1967.

RESPONSE: Denied for lack of information

REQUEST NO. 64: You took, and paid for, a trip to Daytona Beach, Florida, with James Wells.

RESPONSE: Objected as irrelevant with no showing as to how it would be relevant to any of the issues in this case. Notwithstanding the foregoing, admit that as best as I recall, over 50 years ago, I went to visit my brother and his wife in Florida. I do not recall any of the places that I stayed overnight other than with them

