

JEH
DHE
BASS -
GREEN
PROFESSIONAL
ASSOCIATION



August 9, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

[REDACTED], Clerk
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Re: [REDACTED] v. The Roman Catholic Bishop of
Manchester, Gordon MacRae, Father John Doe
I, Father John Doe II, and [REDACTED]
[REDACTED] v. Gordon J. MacRae, The Roman
Catholic Bishop of Manchester, and Father
Gerard Boucher

Dear [REDACTED]:

Enclosed for filing please find an original and
15 copies of our Interlocutory Appeal from Ruling and
8 copies of the Appendix to Interlocutory Appeal.
Also enclosed is our check for \$125.00.

Very truly yours,

James E. Higgins

JEH/slb
Enc.

cc: Mark A. Abramson, Esquire
George P. Dickson, Esquire
Peter A. Gleichman, Esquire
Eileen Nevins, Esquire
Gordon MacRae

PROFESSIONAL
ASSOCIATION



August 8, 1994

PERSONAL AND CONFIDENTIAL

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Monsignor Francis J. Christian
Chancellor
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

Re: [REDACTED] v. Gordon MacRae and
Roman Catholic Bishop of Manchester

[REDACTED] v. Gordon MacRae
Roman Catholic Bishop of Manchester and
Father Gerard Boucher -- [REDACTED]

[REDACTED] v. Gordon MacRae and Roman
Catholic Bishop of Manchester
[REDACTED]

Dear Monsignor Christian:

Judge Conboy has agreed to transfer the statute of limitations question to the New Hampshire Supreme Court. We will forward the appropriate documents to the New Hampshire Supreme Court which will then decide whether or not to accept the interlocutory appeal. We will let you know of any further developments.

As always, if you have any questions please do not hesitate to call me.

Very truly yours,

Robert R. Lucic

RRL/edf

EILEEN A. NEVINS
ATTORNEY AT LAW

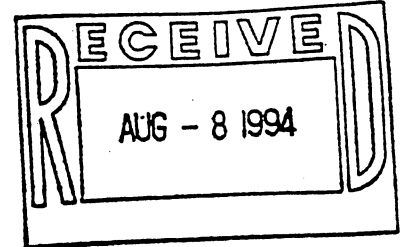
P.O. Box 411
Amesbury, MA. 01913

9869

Phone: (800) 926-0564
(603) 926-1366

Fax: (603) 926-1366
Lic. in Ma.

August 5, 1994



[REDACTED], Clerk
[REDACTED] Superior Court
[REDACTED]
[REDACTED]

RE:

[REDACTED] v. MacCrae, et al
[REDACTED] v. MacCrae, et al
[REDACTED] v. MacCrae, et al

Dear [REDACTED]:

Enclosed please find my formal Motion for Appearance for Counsel for Gordon MacRae as directed by Judge Conboy to be filed in the Hillsborough County-Northern District Superior Court.

Thank you for your attention in this matter.

Respectfully,

Eileen A. Nevins, Esq.

Copies to: George P. Dickson, Esq.
Marl A. Abramson, Esq.
James E. Higgins, Esq.
Peter A. Gleichman, Esq.
Peter W. Heed, Esq.
Gordon MacRae

DOUGLAS F. GREEN
MICHAEL A. McMAHON
PETER W. HEED
JOHN A. BELL

August 4, 1994

James E. Higgins, Esquire
SHEEHAN, PHINNEY, BASS & GREEN
1000 Elm Street, P.O. Box 3701
Manchester, New Hampshire 03105-3701

Re: [REDACTED] vs. Gordon MacRae, et al
[REDACTED] vs. Gordon MacRae, et al
[REDACTED] vs. Gordon MacRae

Dear Jim:

Enclosed, please find an Assented To Motion for Approval of Discovery Schedule, which was originally prepared by Peter Gleichman. If you assent to the Motion, would you kindly sign where indicated and forward the original to Mr. MacRae for his signature and filing with the Court.

I appreciate your cooperation.

Very truly yours,

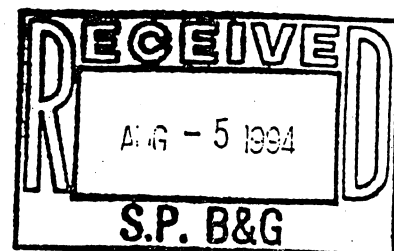
GREEN, McMAHON AND HEED

Peter W. Heed

PWH:cam

Enclosure

cc: Mark A. Abramson, Esquire
cc: Peter A. Gleichman, Esquire
cc: Gordon J. MacRae
cc: George P. Dickson, Esquire



SS

v.

GORDON MacRAE, et al

Docket No. [REDACTED]

v.

GORDON MacRAE, et al

Docket No. [REDACTED]

v.

GORDON MacRAE, et als

Docket No. [REDACTED]

ASSENTED-TO MOTION FOR APPROVAL OF DISCOVERY SCHEDULE

NOW COME the parties in connection with the above-referenced consolidated matters, by their attorneys or pro se, and hereby agree to entry an Order approving the following Pretrial Discovery Schedule:

- (a) Complete depositions of any witnesses January 1, 1995
- (b) Plaintiffs' experts February 15, 1995
- (c) Disclosure of Defendants' experts March 15, 1995
- (d) Completion of discovery May 15, 1995
- (e) Filing of Pretrial Statements July 15, 1995
- (f) Trial After September 1, 1995

Mark A. Abramson

Mark A. Abramson, Attorney
for [REDACTED]

James E. Higgins, Attorney for Roman
Catholic Bishop of Manchester, Inc.,
et als

Peter W. Heed

Peter W. Heed, Attorney
for [REDACTED]

Gordon J. MacRae, Pro Se

Peter A. Gleichman

Peter A. Gleichman, Attorney
for [REDACTED]

WHEE-
CHAMBER
BASS -
GREEN
PROFESSIONAL
ASSOCIATION



July 29, 1994

PERSONAL AND CONFIDENTIAL

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Monsignor Francis J. Christian
Chancellor
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

Re: [REDACTED] v. Roman Catholic
Bishop of Manchester and Gordon Macrae

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Dear Monsignor Christian:

Enclosed is a copy of Plaintiff's Supplement to his First Request for Production of Documents. Kindly pull together what you have in response to this request and forward them to me. We must respond by August 28th.

Should you have any questions about this, give me a call.

Best regards,

A handwritten signature in black ink, appearing to read 'James E. Higgins', written over a horizontal line.

James E. Higgins

JEH/slb
Enc.

9873

ATTORNEYS AT LAW
56 MIDDLE STREET
P. O. BOX 598
PORTSMOUTH, NEW HAMPSHIRE 03802-0598

Handwritten signature

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

MAINE
PETER A. GLEICHMAN

July 28, 1994

James E. Higgins, Esquire
SHEEHAN, PHINNEY, BASS &
GREEN, P.A.
P.O. Box 3701
Manchester, N.H. 03105-3701

RE: [REDACTED] v. Gordon MacRae, et al.
County Docket Number: [REDACTED]

Dear Jim:

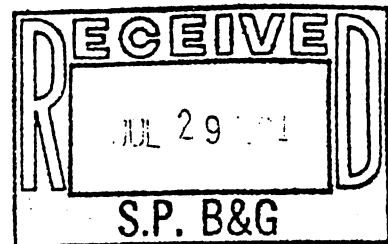
You will find enclosed an original and two copies of the First Supplement to Plaintiff's First Request for Production of Documents to be answered within thirty (30) days.

Sincerely yours,

Peter A. Gleichman
Peter A. Gleichman

PAG:djm
Enclosures as stated

cc: Mark A. Abramson, Esquire
George P. Dickson, Esquire
Peter W. Heed, Esquire
Gordon MacRae



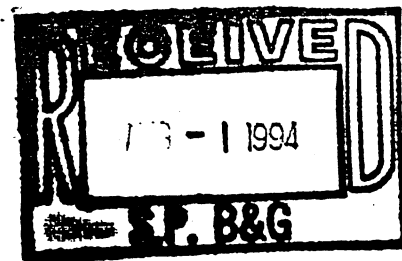
Tel: (505) 842-1987 (office)
(505) 343-3355 (voice mail)
Fax: (505) 829-3706 (office)
(505) 829-3592 (modem)
Internet: drca19a@prod.com

Rev. Gordon J. MacRae
Post Office Box 10
Jemez Springs, New Mexico
87025-0010

9874

July 25, 1994

James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P. O. Box 3701
Manchester, NH 03105-3701



Dear Mr. Higgins,

I have received a copy of **PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT THE ROMAN CATHOLIC BISHOP OF MANCHESTER** purported by [REDACTED] by his attorney, Peter A. Gleichman, and dated July 21, 1994.

On advice of counsel I wish to call to your attention that any documents, records, reports or files the Diocese of Manchester may have in its possession pertaining to Items 15, 16, 17, 19, 20, and 24 were released to specific personnel of the Diocese of Manchester with specific limitations as to their use, and with strict prohibitions against further disclosure without written authorization. Releasing any of these items without written authorization from me may expose the Diocese to further litigation.

Please be aware that I do not, and will not, waive any rights I have under federal law and/or laws specific to the State of New Hampshire, the Commonwealth of Massachusetts, the State of New Mexico or the State of Maine, where some of the documentation of this treatment may exist or may have originated, pertaining to prohibitions against disclosure by physician-patient, psychotherapist-patient, priest-penitent, attorney-client privileges, privilege against self-incrimination and/ or any other privileges or rights assigned to me by law.

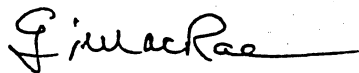
Further, I am aware that the Diocese released my personnel file to the state upon subpoena. I regret that I cannot condone this action which was done without question and without affording me an opportunity to challenge the state's request. If I had been aware that such a step was being taken I would have moved to quash the state's attempt to obtain this file, the contents of which are protected by the United States Constitution. I have conducted substantial research in this area and have become aware of multiple precedents which would have afforded me the right to challenge the states' action in this matter, and my challenge would likely have been successful.

I have attached a copy of one such legal precedent in a ruling involving the Diocese of Crookston. I am aware of another involving the Diocese of Altoona-Johnstown. I have access to several other rulings involving the United States District Courts and would be happy to send them to you if you wish. There was information in

this file which required my specific permission to release. For example, seminary evaluations which included spiritual direction reports and evaluations and progress reports from seminary faculty advisors required my express permission before they could be released. While at St. Mary's Seminary and University I signed limited releases for such reports to be released only to specific personnel of the Diocese of Manchester. There was no authorization for any other release of these documents. I have a copy of my entire file from St. Mary's which includes copies of these restricted and time limited releases. The use of the grand jury to obtain undiscoverable documents, and the response of the Diocese to it, warrants further consideration.

As a final matter, I have attached copies of Powers of Attorney which will permit Eileen Nevins, Esquire, to represent my interests to the Diocese along with Father Deibel.

Respectfully,



(Rev.) Gordon J. MacRae

cc: Rev. Msgr. Francis Christian, Ph.D.
Ron Koch, Esquire
Rev. David Deibel, J.D., J.C.L., Esquire
Eileen Nevins, Esquire
Ernesto Romero, Esquire

Enc.(2) Law Briefs: "First Amendment Protects Diocese's Investigation of Priest's Alleged Sexual Misconduct" (1 Page).

Powers of Attorney (2 Pages)

STATE LITIGATION

First Amendment Protects Diocese's Investigation of Priest's Alleged Sexual Misconduct

The Diocese of Crookston duly reported allegations of sex abuse to the county social services agency. As a result, one of the Diocese's priests was charged with numerous counts of criminal sexual conduct. The prosecutor then sought to subpoena the Diocese's file containing information from the Diocese's own investigation of the allegations. The Diocese moved to quash, citing the attorney/client privilege, work product, the priest/penitent privilege, and the religious freedom provisions of both the United States and the Minnesota constitutions.

Ruling on the motion, Judge L.G. Jorgenson of the District Court, Roseau County, Minnesota, found no factual basis for the legal or confessional privileges advanced by the Diocese. He then turned to the constitutional arguments. Noting that the Code of Canon Law requires investigation of clerical misconduct, and that the Code further requires confidentiality concerning the investigation, he concluded that forcing the Diocese to disclose the investigatory file would infringe its free exercise of religion.

In response to the prosecutor's argument that the state has a compelling interest in enforcement of criminal sanctions against sexual misconduct, the court agreed but found no showing by the state that production of the file was necessary to protect that interest. According to Judge Jorgenson, before it will be allowed to search the Diocese's confidential records, the government must demonstrate more than a mere suspicion that the file contains valuable evidence. The motion to quash was therefore granted.

See: *Minnesota v. Carriere*, District Court, County of Roseau, 9th Judicial District (Dec. 11, 1991) (mem. opinion).

Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

COPY

9877

TEL: (505) 842-1987 / (505) 343-3355
FAX: (505) 829-3706

POWER OF ATTORNEY

The undersigned, Gordon James MacRae, of Jemez Springs, New Mexico, has made, constituted and appointed, and do make constitute and appoint, Eileen Nevins, Esquire, of Hampton, New Hampshire, my true and lawful attorney in fact, for me and in my name and stead, and to my use, to represent me in all matters pertaining to pending litigation in the State of New Hampshire hereby giving to my attorney in fact, full authority and power to do everything whatsoever requisite or necessary to be done, as fully as I could or might do if personally present, with full power of substitution and revocation, hereby confirming and ratifying all that my said attorney in fact shall lawfully do or cause to be done, hereunder.

Dated: July 18, 1994

Dolores J. Malgouas
Witness/Notary Public

Gordon J. MacRae
Gordon James MacRae

MY COMMISSION EXPIRES: Oct. 30, 1996

Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

COPY

9878

TEL: (505) 842-1987 / (505) 343-3355
FAX: (505) 829-3706

POWER OF ATTORNEY

The undersigned, Gordon James MacRae, of Jemez Springs, New Mexico, has made, constituted and appointed, and do make constitute and appoint, Eileen Nevins, Esquire, of Hampton, New Hampshire, my true and lawful attorney in fact, for me and in my name and stead, and to my use, to act as co-counsel with Ron Koch, Esquire and James R. Davis, Esquire, in all matters pertaining to pending criminal litigation in the State of New Hampshire hereby giving to my attorney in fact, full authority and power to do everything whatsoever requisite or necessary to be done, as fully as I could or might do if personally present, with full power of substitution and revocation, hereby confirming and ratifying all that my said attorney in fact shall lawfully do or cause to be done, hereunder.

Dated: May 17, 1994

Dolores J. McGraw
Witness/Notary Public

G. J. MacRae
Gordon James MacRae

NOTARY COMMISSION EXPIRES: Oct. 30, 1996

COPY

9879

Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010
Tel: (505) 842-1987 / Fax: (505) 829-3706
Toll Free: 1-800-626-8660 ext. 28

April 21, 1994

To Whom it May Concern:

This letter grants power of attorney to Mrs. Eileen Nevins who is conducting an investigation on my behalf related to indictments brought against me in the Counties of [REDACTED] and [REDACTED] in New Hampshire.

Signed:

Gordon J. MacRae
Gordon J. MacRae

April 21, 1994
Date

Justice of the Peace / Notary Public

Tel: (505) 842-1987 (office)
(505) 343-3355 (voice mail)
Fax: (505) 829-3706 (office)
(505) 829-3592 (modem)
Internet Address: drca19a@prod.com

Rev. Gordon J. MacRae
Post Office Box 10
Jemez Springs, New Mexico
87025-0010

9880

July 25, 1994

CONFIDENTIAL FAX

TO: JAMES E. HIGGINS, ESQ.
SHEEHAN, PHINNEY, BASS & GREEN

FAX No: (603) 627-8121

PAGES: 3 (INCLUDING COVER SHEET)

Confidentiality Notice

This communication is intended for the exclusive use of the person to whom it is addressed above, and may contain information which is privileged, confidential and exempt from disclosure. Any dissemination, distribution or copying of this communication by anyone other than the intended recipient, or the person responsible for its delivery, is strictly prohibited. If you have received this communication in error, please telephone this office (collect) immediately and return the original to the sender via United States Mail.

Comments and Instructions

ORIGINAL TO FOLLOW VIA FIRST CLASS MAIL

FAXED
7/25/94

Tel: (505) 842-1987 (office)
(505) 343-3355 (voice mail)
Fax: (505) 829-3706 (office)
(505) 829-3592 (modem)
Internet Address: drca19a@prod.com

Rev. Gordon J. MacRae
Post Office Box 10
Jemez Springs, New Mexico
87025-0010

9881

July 25, 1994

James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P. O. Box 3701
Manchester, NH 03105-3701

FAXED
7/25/94

ORIGINAL TO FOLLOW VIA
1ST CLASS MAIL

Dear Mr. Higgins,

I have received a copy of PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT THE ROMAN CATHOLIC BISHOP OF MANCHESTER purported by [REDACTED] by his attorney, Peter A. Gleichman, Esq and dated July 21, 1994.

On advice of counsel I wish to call to your attention that any documents, records, reports or files the Diocese of Manchester may have in its possession pertaining to Items 15, 16, 17, 19, 20, and 24 were released to specific personnel of the Diocese of Manchester with specific limitations as to their use, and with strict prohibitions against further disclosure without written authorization. Releasing any of these items without written authorization may expose the Diocese to further litigation.

Please be aware that I do not, and will not, waive any rights I have under federal law and/or laws specific to the State of New Hampshire, the Commonwealth of Massachusetts, the State of New Mexico or the State of Maine, where some of the documentation of this treatment may exist or may have originated, to protection by physician-patient, psychotherapist-patient, priest-penitent, attorney-client privileges, privilege against self-incrimination and/ or any other privilege or rights assigned to me by law.

Further, I am aware that the Diocese released my personnel file to the state upon subpoena. I regret that I cannot condone this action which was done without question and without affording me an opportunity to challenge the state's request. If I had been aware that such a step was being taken I would have moved to quash the state's attempt to obtain this file, the contents of which are protected by the United States Constitution. I have conducted substantial research in this area and have become aware of multiple precedents which would have afforded me the right to challenge the states' action in this matter, and my challenge would likely have been successful.

I have attached a copy of one such legal precedent in a ruling involving the Diocese of Crookston. I am aware of another involving the Diocese of Altoona-Johnstown. I have access to several other rulings involving the United States District Courts and would be

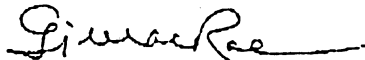
9882

Alfred L. Green, Esq.
June 28, 1994 / page two

happy to send them to you if you wish. There was information in this file which required my specific permission to release. For example, seminary evaluations which included spiritual direction reports and evaluations and progress reports from seminary faculty advisors required my express permission before they could be released. While at St. Mary's Seminary and University I signed limited releases for such reports to be released only to specific personnel of the Diocese of Manchester. There was no authorization for any other release of these documents. I have a copy of my entire file from St. Mary's which includes copies of these restricted and time limited releases. The use of the grand jury to obtain undiscoverable documents, and the response of the Diocese to it, warrants further consideration.

As a final matter, I have attached copies of Powers of Attorney which will permit Eileen Nevins, Esquire, to represent my interests to the Diocese along with Father Deibel.

Respectfully,



(Rev.) Gordon J. MacRae

cc: Rev. Msgr. Francis Christian, Ph.D.
Ron Koch, Esquire
Rev. David Deibel, J.D., J.C.L., Esquire
Eileen Nevins, Esquire
Ernesto Romero, Esquire

Enc.(2) Law Briefs: "First Amendment Protects Diocese's Investigation of Priest's Alleged Sexual Misconduct" (1 Page).

Powers of Attorney

SHEERMA
PHINNEY
BASS -
GREEN
PROFESSIONAL
ASSOCIATION

9883



July 22, 1994

PERSONAL AND CONFIDENTIAL

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Monsignor Francis J. Christian
Chancellor
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

Re: [REDACTED] v. Roman Catholic
Bishop of Manchester and Gordon Macrae


1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Dear Monsignor Christian:

Enclosed is a copy of Plaintiff's First Request for Production of Documents. Kindly pull together what you have in response to this request and forward them to me. We must respond by August 21st.

Should you have any questions about this, give me a call.

Best regards,


James E. Higgins

JEH/slb
Enc.

9884

GRIFFIN, SWANSON & GLEICHMAN, P.A.

ATTORNEYS AT LAW
56 MIDDLE STREET
P.O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

July 21, 1994

James E. Higgins, Esquire
SHEEHAN, PHINNEY, BASS
& GREEN, P.A.
P.O. Box 3701
Manchester, N.H. 03105-3701

RE: [REDACTED] v. Gordon MacRae, et al.
County Docket Number: [REDACTED]

Dear Jim:

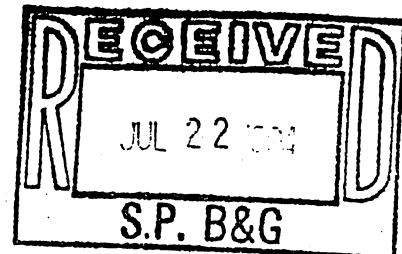
You will find enclosed an original and two copies of Plaintiff's First Request for Production of Documents to be answered within thirty (30) days.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

PAG:djm
Enclosures as stated

cc: Mark A. Abramson, Esquire
George P. Dickson, Esquire
Peter W. Heed, Esquire
Gordon MacRae



SPENCER, ABRAMSON & GLEICHMAN, P.C.

ATTORNEYS AT LAW
55 MIDDLE STREET
P.O. BOX 598
PORTSMOUTH, NEW HAMPSHIRE 03802-0598

COPY

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

TT 11/50 7/91
TW 5/92 10/92

July 20, 1994

[Redacted], Clerk
COUNTY SUPERIOR COURT
[Redacted]

RE: [Redacted] v. Roman Catholic Bishop of Manchester,
et al.

[Redacted] Docket Number: [Redacted] and

[Redacted] v. Gordon MacRae, et al.
[Redacted] County Docket Number: [Redacted]

Dear [Redacted]:

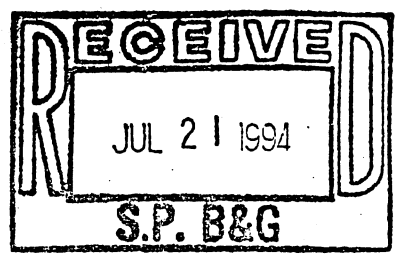
Please find enclosed for filing with the Court, Plaintiff
[Redacted] Objection to Defendants' Motion to Allow
Interlocutory Appeal.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: Mark A. Abramson, Esquire
James E. Higgins, Esquire
George P. Dickson, Esquire
Gordon MacRae
Peter W. Heed, Esquire
[Redacted]



FREEDMAN
FRANKNER
BASS -
GREEN
PROFESSIONAL
ASSOCIATION



July 13, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

[Redacted] Clerk
[Redacted] County Superior Court

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Re: [Redacted] v. Roman Catholic Bishop
of Manchester, Gordon MacRae, Father John
Doe I and Father John Doe II -- [Redacted]

Re: [Redacted] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [Redacted]
[Redacted] County case

Dear [Redacted]:

Enclosed please find Defendants Roman Catholic
Bishop of Manchester and Monsignor Gerard Boucher's
Motion to Allow Interlocutory Appeal with the
Interlocutory Appeal Statement pursuant to Supreme
Court Rule 8 and accompanying Appendix for the
Court's signature.

Very truly yours,

James E. Higgins

JEH/slb
Enc.

cc: Mark A. Abramson, Esquire
Peter Gleichman, Esquire
George P. Dickson, Esquire
Gordon MacRae
Eileen Nevins, Esquire

cc: Raymond Diamond
Monsignor Christian

Gordon J. MacRae
Fort Collins, Colorado
James Springs, CO 80525-3610

9887

Tel: (505) 842-1987 / Fax: (505) 829-3706

July 12, 1994

[REDACTED] k
[REDACTED] County Superior Court
[REDACTED]

RE:

[REDACTED] v. MacRae, et als

[REDACTED] County Case

[REDACTED] v. MacRae, et al

[REDACTED] County Case

[REDACTED] v. MacRae, et al

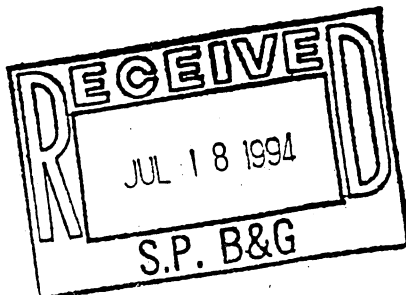
Dear [REDACTED]

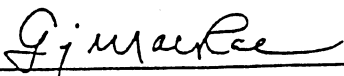
Enclosed please find Defendant, Gordon J. MacRae's SECOND REPLY TO PLAINTIFFS' OBJECTIONS TO DEFENDANT GORDON MACRAE'S MOTION TO ALLOW APPEARANCE BY OUT-OF-STATE COUNSEL to be filed in [REDACTED] County Superior Court in the above captioned matters.

Copies of the within Second Reply have been mailed this date to Mark A. Abramson, Esquire; Peter A. Gleichman, Esquire; James E. Higgins, Esquire; Peter W. Heed, Esquire; and Eileen Nevins, Esquire.

Thank you for your attention to this matter.

Sincerely,




Gordon J. MacRae
Defendant, pro se

Copy to:

Marion Abramson, Esq.
Abramson, Reis & Brown
1819 Elm Street
Manchester, NH 03104

James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P.O. Box 3701
Manchester, NH 03105-3701

Peter A. Gleichman, Esq.
Griffin, Swanson & Gleichman
P.O. Box 598
Portsmouth, NH 03802-0598

Peter W. Heed, Esq.
Green, McMahon & Heed
28 Middle Street
Keene, NH 03431

Eileen Nevins, Esq.
36 Ashbrook Drive
Hampton, NH 03842

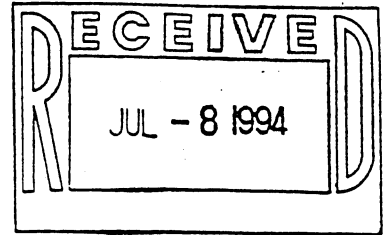
COPY

Post Office Box 10
Jemez Springs, NM 87025-0010

9889

Tel: (505) 842-1987 / Fax: (505) 829-3706

July 5, 1994



[Redacted] Clerk
County Superior Court
[Redacted]

RE: [Redacted]
[Redacted] v. MacRae, et als
[Redacted] County Case
[Redacted] v. MacRae, et al
[Redacted] County Case
[Redacted] v. MacRae, et al

Dear [Redacted]:

Enclosed please find the herein REPLY TO PLAINTIFFS' OBJECTIONS TO DEFENDANT GORDON MACRAE'S MOTION TO ALLOW APPEARANCE BY OUT-OF-STATE COUNSEL to be filed in [Redacted] County Superior Court in the above captioned matters.

Thank you for your attention to this matter.

Sincerely,

G. MacRae

Gordon J. MacRae
Defendant, pro se

394 Elm Street, Box 1
Milford, NH 03055

9890


Mark A. Abramson, Esq.
Abramson, Reis & Brown
1819 Elm Street
Manchester, NH 03104

James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P.O. Box 3701
Manchester, NH 03105-3701

Peter A. Gleichman, Esq.
Griffin, Swanson & Gleichman
P.O. Box 598
Portsmouth, NH 03802-0598

Peter W. Heed, Esq.
Green, McMahon & Heed
28 Middle Street
Keene, NH 03431

Eileen Nevins, Esq.
36 Ashbrook Drive
Hampton, NH 03842



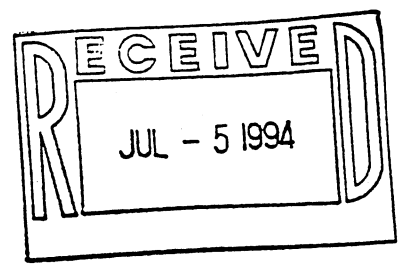
CODV

Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

9891

Tel: (505) 842-1987 / Fax: (505) 829-3706

July 1, 1994



[Redacted], Clerk
[Redacted] County Superior Court
[Redacted]
[Redacted]

RE: [Redacted]
[Redacted] v. MacRae, et als

[Redacted] County Case
[Redacted] v. MacRae, et al

[Redacted] County Case
[Redacted] v. MacRae, et al

Dear [Redacted]

Enclosed please find Defendant, Gordon J. MacRae's SUPPLEMENTAL MOTION TO ALLOW APPEARANCE BY OUT-OF-STATE COUNSEL to be filed in [Redacted] County Superior Court in the above captioned matters.

Proposed out-of-state Counsel is herein identified as Ms. Eileen Nevins, Esquire, who resides at 36 Ashbrook Drive, Hampton, NH 03842.

Sincerely,

G. MacRae

Gordon J. MacRae
Defendant, pro se

Copy to: George P. Dickson, Esq.
394 Elm Street, Box 1
Milford, NH 03055

Mark A. Abramson, Esq.
Abramson, Reis & Brown
1819 Elm Street
Manchester, NH 03104

James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P.O. Box 3701
Manchester, NH 03105-3701

Peter A. Gleichman, Esq.
Griffin, Swanson & Gleichman
P.O. Box 598
Portsmouth, NH 03802-0598

Peter W. Heed, Esq.
Green, McMahon & Heed
28 Middle Street
Keene, NH 03431

Eileen Nevins, Esq.
36 Ashbrook Drive
Hampton, NH 03842

GRIFFIN, SWANSON & GLEICHMAN, P.A.

9893

ATTORNEYS AT LAW
56 MIDDLE STREET
P. O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

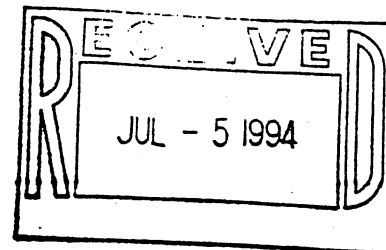
CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

July 1, 1994



[REDACTED], Clerk
COUNTY SUPERIOR COURT
[REDACTED]
[REDACTED]

RE: [REDACTED] v. Gordon MacRae, et als
[REDACTED] Docket Number: [REDACTED]

Dear [REDACTED]

Please find enclosed for filing with the Court, Plaintiff's
Objection to Defendant Gordon MacRae's Motion to Allow Appearance
by Out-of-State counsel.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: Mark A. Abramson, Esquire
James E. Higgins, Esquire
Peter W. Heed, Esquire
Gordon MacRae
[REDACTED]

DOUGLAS F. GREEN
LEWIS A. McMAHON
PETER W. HEED
JOHN A. BELL

COPY

June 30, 1994

[REDACTED], Clerk
COUNTY SUPERIOR COURT
[REDACTED]

Re: [REDACTED] vs. Gordon MacRae, et al - [REDACTED]
[REDACTED] vs. Gordon MacRae, et al - [REDACTED]
[REDACTED] vs. Gordon MacRae, et al - [REDACTED]

Dear [REDACTED]:

Enclosed, please find PLAINTIFF [REDACTED] OBJECTION TO DEFENDANT'S MOTION TO ALLOW APPEARANCE BY OUT-OF-STATE COUNSEL, with regard to the three above entitled matters, all pending in the Hillsborough County Superior Court, for filing with the Court.

Copies of the within Objection have been mailed this date to Mark A. Abramson, Esquire; Peter A. Gleichman, Esquire; James E. Higgins, Esquire; and the Defendant, Gordon MacRae.

Thank you for your courtesy and cooperation.

Very truly yours,

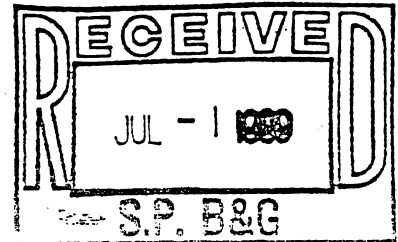
GREEN, McMAHON AND HEED

Peter W. Heed

PWH:cam

Enclosure

cc: Mark A. Abramson, Esquire
cc: Peter A. Gleichman, Esquire
cc: James E. Higgins, Esquire ✓
cc: Gordon MacRae



Abramson, Reis
& Brown

A T T O R N E Y S

9895

June 29, 1994

Stanley M. Brown
Kenneth C. Brown
Randolph J. Reis
Mark A. Abramson
Kevin F. Dugan*

[REDACTED] Clerk
[REDACTED] Superior Court
[REDACTED]

Re: [REDACTED] v. Gordon MacRae, et al

Dear [REDACTED]

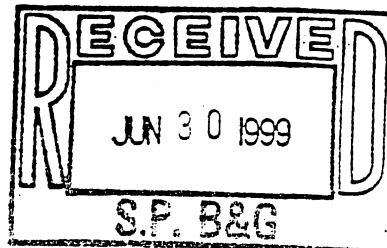
Enclosed please find Plaintiff's Objection to Defendant Gordon MacRae's Motion to Allow Appearance by Out of State Counsel.

Very truly yours,

Mark A. Abramson

MAA/mc

cc: Gordon J. MacRae
James E. Higgins, Esq.
George Dickson, Esq.
Peter A. Gleichman, Esq.
Peter W. Heed, Esq.
[REDACTED]



AR
SE

1819 Elm Street

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

9896



June 28, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Gordon J. MacRae
P. O. Box 10
Jemez Springs, NM 87025-0010

Re: [REDACTED] v. MacRae
[REDACTED] v. MacRae
[REDACTED] v. MacRae

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Dear Mr. MacRae:

I have your Motion to allow appearance by out of state counsel. I certainly will not object to its allowance..

However, I do want to mention that routinely the identity of the out of state counsel is disclosed in such motions along with a brief summary of her experience and the courts in which she is allowed to practice.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'James E. Higgins', written over a horizontal line.

James E. Higgins

JEH/slb

COPY

Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

9897

Tel: (505) 842-1987 / Fax: (505) 829-3706

June 22, 1994

[REDACTED], Clerk
County Superior Court
[REDACTED]

RE: [REDACTED]
[REDACTED] v. MacRae, et als

[REDACTED] County Case
[REDACTED] v. MacRae, et al

[REDACTED] County Case
[REDACTED] v. MacRae, et al

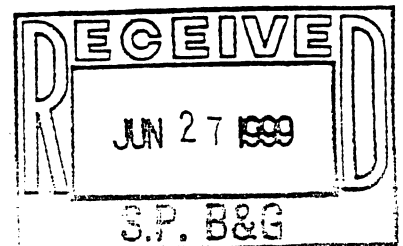
Dear [REDACTED]

Enclosed please find DEFENDANT GORDON MACRAE'S MOTION TO ALLOW APPEARANCE BY OUT-OF-STATE COUNSEL to be filed in Hillsborough County Superior Court in the above captioned matters.

Sincerely,

G. MacRae

Gordon J. MacRae
Defendant, pro se



Copy to: George P. Dickson, Esq.
394 Elm Street, Box 1
Milford, NH 03055

9898

Mark A. Abramson, Esq.
Abramson, Reis & Brown
1819 Elm Street
Manchester, NH 03104

✓ James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P.O. Box 3701
Manchester, NH 03105-3701

Peter A. Gleichman, Esq.
Griffin, Swanson & Gleichman
P.O. Box 598
Portsmouth, NH 03802-0598

Peter W. Heed, Esq.
Green, McMahon & Heed
28 Middle Street
Keene, NH 03431

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION



June 23, 1994

PERSONAL AND CONFIDENTIAL

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Monsignor Francis J. Christian
Chancellor
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Re: [redacted] v. Roman Catholic Bishop
of Manchester, Gordon MacRae, Father John
Doe I and Father John Doe II -- [redacted]

Re: [redacted] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [redacted]
[redacted] County case

Dear Monsignor Christian:

I enclose a copy of the Order of Judge Conboy denying our Motions to Dismiss in the above-referenced cases. The result is disappointing, but, given the National trends, not totally unexpected.

I believe we have grounds for appeal in these cases and we may have a chance to have an interlocutory appeal (an appeal before final hearing on the merits) recommended by Judge Conboy and accepted by the Supreme Court. We must now consider whether it is prudent and cost effective to appeal at this time.

Our position is that the statute of limitations started running in these cases with the event itself and not upon some fanciful "connection" being drawn by a psychologist for the individual plaintiffs between their problems and the "abuse". Time starts running following an event which must notify a plaintiff of his injury or at least that his rights have been affected. This is so even though a plaintiff does not fully appreciate the extent of his injuries. The Supreme Court should uphold this principle in abuse cases.


Monsignor Francis J. Christian
June 23, 1994
Page 2

We have a stronger case against [REDACTED] than we do against [REDACTED]. [REDACTED] actively complained at the time of the problem back in 1983 and again in 1986. [REDACTED] did not. [REDACTED] complaints to me indicate a full recognition that he had been injured and the statute should have started running at that point in time.

While deciding whether to take an appeal at this time, however, we must consider the political climate. It seems to me that courts across the nation are reluctant to dismiss these claims on the basis of the statute of limitations. It may be that the cases are just too "high profile" or it may be that judges are squeamish about seeming to cut off the rights of adults who claim to be injured while children. It is probably fair to say that we have an uphill fight at the Supreme Court.

We have 30 days from the date of the decision within which to bring our appeal. Let's talk.

Very truly yours,


James E. Higgins

JEH/slb
Enc.

cc: Mr. Raymond Dumont

Abramson, Reis
& Brown

ATTORNEYS

9901

June 9, 1994

Stanley M. Brown
Kenneth C. Brown
Randolph J. Reis
Mark A. Abramson
Kevin F. Dugan*

[REDACTED], Clerk
[REDACTED] County Superior Court
[REDACTED]

Re: [REDACTED] v. Gordon MacRae, et al

Dear [REDACTED]:

Judge Conboy requested that we respond to her before June 10, 1994, regarding our position on whether or not we wanted her to recuse herself from this case. I have consulted with my client and he and I would respectfully request that Judge Conboy remain as the specially assigned judge on these cases. Can you please bring this to the attention of Judge Conboy at your convenience.

Thank you very much.

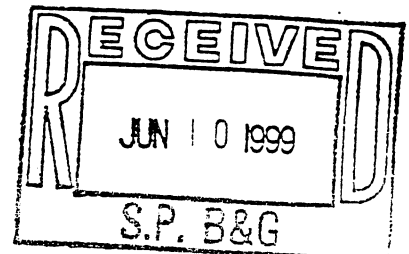
Very truly yours,

Mark A. Abramson

MAA/mc

DELIVERED IN HAND

cc: James E. Higgins, Esq.
George Dickson, Esq.
Peter A. Gleichman, Esq.
Peter W. Heed, Esq.
William W. Cleary, Esq.
[REDACTED]



AR
&B

1819 Elm Street

MINNEAPOLIS, MN 55404-2501

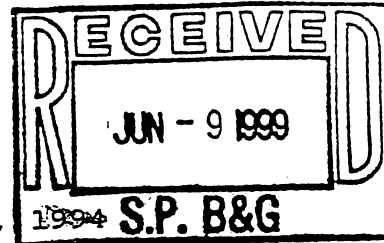
TEL: 612-338-1111 FAX: 612-338-1112

GREEN, McMAHON & HEED
ATTORNEYS AT LAW

9902

DOUGLAS F. GREEN
LEWIS A. McMAHON
PETER W. HEED
JOHN A. BELL

COPY



June 8, 1994

Clerk
[Redacted]
[Redacted]
[Redacted]

Re: [Redacted] vs. Gordon MacRae, et al - [Redacted]
[Redacted] vs. Gordon MacRae, et al - [Redacted]
[Redacted] vs. Gordon MacRae, et als - [Redacted]

Dear [Redacted]:

Please be advised that I have reviewed with my client Judge Conboy's involvement with the Catholic Church, together with that of her husband, and we have NO OBJECTION to the Judge's continuing involvement in these cases.

I appreciate your courtesy and cooperation.

Very truly yours,

GREEN, McMAHON AND HEED

Peter W. Heed

PWH:cam

- cc: Client
- cc: George P. Dickson, Esquire
- cc: Mark A. Abramson, Esquire
- cc: James E. Higgins, Esquire ✓
- cc: Gordon MacRae
- cc: Peter A. Gleichman, Esquire

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

9903



June 8, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

[REDACTED], Clerk
County Superior Court
[REDACTED]

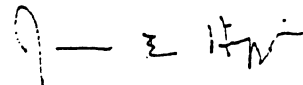
Re: [REDACTED] v. Roman Catholic Bishop
of Manchester, Gordon MacRae, Father John
Doe I and Father John Doe II -- [REDACTED]

Re: [REDACTED] v. Gordon MacRae and The
Roman Catholic Bishop of Manchester --
[REDACTED] County case

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [REDACTED]
[REDACTED] County case

Dear [REDACTED]:

This letter is written in response to the Court's Order in connection with her continuing involvement in the pretrial phase of these cases. On behalf of the Defendants Roman Catholic Bishop of Manchester and Monsignor Gerard Boucher we have no objection to Judge Conboy's continuing involvement in these matters.

Very truly yours,

James E. Higgins

JEH/slb

Enc.

cc: Peter Heed, Esquire
Mark A. Abramson, Esquire
Peter Gleichman, Esquire
George P. Dickson, Esquire
Gordon Macrae

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

9905



ATTORNEYS AT LAW

June 6, 1994

PERSONAL AND CONFIDENTIAL

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Monsignor Francis J. Christian
Chancellor
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Re: [REDACTED] v. Gordon MacRae and
Roman Catholic Bishop of Manchester
[REDACTED]
[REDACTED] v. Gordon MacRae
Roman Catholic Bishop of Manchester and
Father Gerard Boucher -- [REDACTED]
[REDACTED] v. Gordon MacRae and Roman
Catholic Bishop of Manchester
[REDACTED]

Dear Monsignor Christian:

On Friday, June 3rd, I argued our Motions to Dismiss in the cases of [REDACTED] v. MacRae, et als and [REDACTED] v. MacRae, et als. As you know, the basis of our Motions is the statute of limitations.

The matters have been consolidated before Judge Carol Ann Conboy who started off the hearing by telling all parties that she was a practicing Catholic. She then allowed all parties until June 10th to object to her presiding over the discovery phase of the three consolidated cases. I told her that we had no objection to her continuing to act in this capacity.

As you know, Gordon MacRae has written to me pointing out that Judge Conboy is a member of the Attorney General's Task Force on child abuse along with Detective McLaughlin from Keene. He initially felt this posed a conflict of interest situation for the Judge and solicited my opinion concerning recusal.

I have gotten to know Judge Conboy this year. I knew her generally as a practitioner at the McLane

Monsignor Francis J. Christian
June 6, 1994
Page 2

law firm in the past, but now belong to an organization which allows us to meet on a monthly basis. I respect both her intellect and her fairness. Hence, I did not hesitate to tell her that we have no objection to her continuing in the case.

She listened carefully to all the arguments which went for nearly 2 hours and I expect a decision to be rendered within a reasonable period of time. Following the decision, if the Diocese has not prevailed, we will adopt a discovery schedule and proceed with discovery in these matters.

Present in Court was a reporter for the Union Leader. How she got word of the hearing, of course, is any one's guess, but I would expect some news story to appear about it.

Very truly yours,

Dictated but not read

James E. Higgins

JEH/slb
cc: Mr. Raymond Dumont

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION



May 31, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

[REDACTED], Clerk
[REDACTED] County Superior Court
[REDACTED]
[REDACTED]

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [REDACTED]

Dear [REDACTED]:

Enclosed please find Defendants' Reply to
Plaintiff's Memorandum of Law in support of Objection
to Motion to Dismiss for filing with the Court in the
above-captioned case.

Very truly yours,

Robert R. Lucic

RRL/slb
Enc.

cc: Peter A. Gleichman, Esquire
Gordon J. MacRae

COF 9908

GRIFFIN, SWANSON & GLEICHMAN, P.A.

ATTORNEYS AT LAW
56 MIDDLE STREET
P.O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

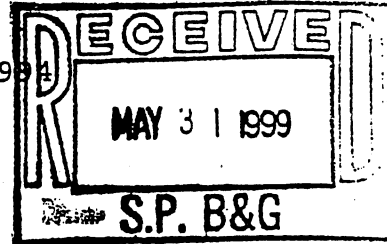
CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL. 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

May 27, 1994



[Redacted], Clerk
SUPERIOR COURT
[Redacted]
[Redacted]

RE: [Redacted] v. Gordon J. MacRae, et als.
Docket Number: [Redacted]

Dear [Redacted]:

You will find enclosed for filing with the Court, the Affidavit of Derek A. Stern, Ph.D. in support of Plaintiff's Objection to Motion to Dismiss in connection with the above-referenced matter. A copy of the enclosed has been forwarded by mail this date to Gordon J. MacRae, Defendant Pro Se, and James E. Higgins, counsel for Defendants Roman Catholic Bishop of Manchester, Inc. and Monsignor Gerard Boucher. Please add this Affidavit to the materials to be considered by Judge Conboy at the hearing in [Redacted]

[Redacted] on June 3, 1994 at 1:30 p.m.

Sincerely,

Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: Gordon J. MacRae
James E. Higgins, Esquire
Mark A. Abramson, Esquire
[Redacted]

COPY

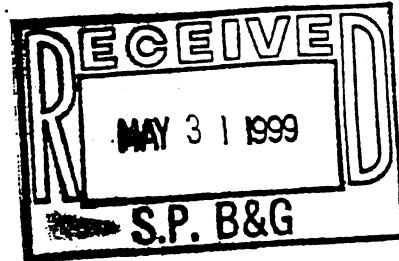
Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

9909

Tel: (505) 842-1987 / Fax: (505) 829-3706

May 25, 1994

[REDACTED] Clerk
[REDACTED] County Superior Court
[REDACTED]



RE: [REDACTED]
[REDACTED] v. MacRae, et als
[REDACTED] County Case
[REDACTED] v. MacRae, et al
[REDACTED] County Case
[REDACTED] v. MacRae, et al

Dear [REDACTED]

The above referenced matters are scheduled for a pre-trial conference on June 3, 1994. I expect to have representation in this matter soon, however my counsel cannot be available on June 3 and needs additional time to review these matters. I have attempted to obtain concurrence from opposing counsel for a thirty day postponement, however opposing counsel would not concur.

Appearing in Manchester on my own behalf on June 3 for a motions hearing would be extremely costly, and I cannot afford to expend that cost. The motions under consideration have not been filed by me and I do not believe I would be compromised in any way by not being represented at this hearing.

I, therefore, request that I may be able to waive my appearance at the hearing on motions scheduled for June 3, 1994.

Thank you for your cooperation in this matter.

Sincerely,

Gordon J. MacRae

Copy to:

George P. Dickson, Esq.
394 Elm Street, Box 1
Milford, NH 03055

Mark A. Abramson, Esq.
Abramson, Reis & Brown
1819 Elm Street
Manchester, NH 03104

James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P.O. Box 3701
Manchester, NH 03105-3701

Peter A. Gleichman, Esq.
Griffin, Swanson & Gleichman
P.O. Box 598
Portsmouth, NH 03802-0598

Peter W. Heed, Esq.
Green, McMahon & Heed
28 Middle Street
Keene, NH 03431

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

9911



ATTORNEYS AT LAW

May 25, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Gordon J. MacRae
P. O. Box 10
Jemez Springs, NM 87025-0010

Re: [REDACTED] v. MacRae
[REDACTED] v. MacRae
[REDACTED] v. MacRae

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Dear Mr. MacRae:

I have your letter of May 18th requesting counsel's cooperation in your desire for a continuance of the structuring conference and motion hearing scheduled for June 3rd. On behalf of the Diocese I will not oppose your request for a postponement. However, you should know that the issues to be discussed are issues which the Diocese desires that the Court address at the earliest possible moment.

Specifically, the Court will no doubt discuss with counsel a discovery schedule for the consolidated cases on June 3rd. Further the Court will hear argument on our Motion to Dismiss in the [REDACTED] and [REDACTED] cases based on the statute of limitations. I am sure you appreciate that we want the issue addressed as soon as possible.

Very truly yours,

A handwritten signature in black ink, appearing to read "James E. Higgins".

James E. Higgins

JEH/slb

cc: Monsignor Francis Christian
Mr. Raymond Dumont

GRIFFIN, SWANSON & GLEICHMAN, P.A.

ATTORNEYS AT LAW

56 MIDDLE STREET

P.O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

COPY 9912

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

May 24, 1994

Gordon J. MacRae
P.O. Box 10
Jemez Springs, New Mexico 87025-0010

RE: [REDACTED] v. MacRae, et als.

Dear Mr. MacRae:

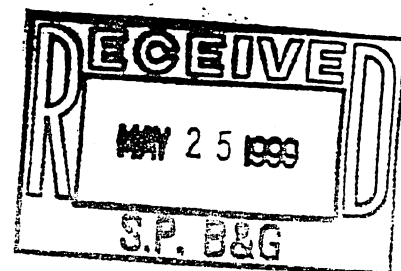
In response to your faxed letter of May 18, 1994, I concur with the letter of Attorney Abramson dated May 20. This case has been pending since September 1993, and I cannot agree to postpone the June 3 hearing.

Sincerely,

Peter A. Gleichman

PAG:djm

cc: Mark A. Abramson, Esquire
Peter W. Heed, Esquire
James E. Higgins, Esquire



Abramson, Reis
& Brown

A T T O R N E Y S

9913

May 20, 1994

Stanley M. Brown
Kenneth C. Brown
Randolph J. Reis
Mark A. Abramson
Kevin F. Dugan*

Gordon J. MacRae
Post Office Box 10
Jemez Springs, New Mexico 87025-0010

Re: [REDACTED] v. MacRae, et al

Dear Mr. MacRae:

In response to your letter sent to me by fax dated May 18, 1994, I cannot agree to continue the hearing scheduled for June 3, 1994 at 1:30 p.m. in the [REDACTED] County Superior Court. This case has been pending since September 10, 1993 and, consequently, no legitimate basis exists to postpone this hearing.

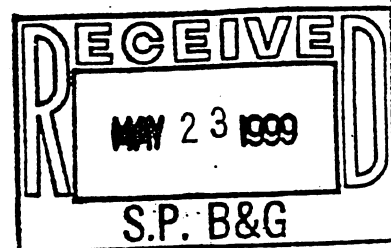
Further, I would like to take your deposition and would like to know when you can make yourself available to be deposed during the month of June, 1994.

Very truly yours,

Mark A. Abramson

MAA/mc
Enclosures

cc: George Dickson, Esq.
James Higgins, Esq.
Peter Gleichman, Esq.
Peter Heed, Esq.



AR
& B

1818 Elm Street

San Francisco, CA 94109

Phone: 415.774.1111

GREEN, McMAHON & HEED
ATTORNEYS AT LAW

9914

DOUGLAS F. GREEN
LEWIS A. McMAHON
PETER W. HEED
JOHN A. BELL

COPY

May 20, 1994

Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

Re: [REDACTED] et al vs. MacRae, et al

Dear Mr. MacRae:

I have your letter of May 18, 1994.

As you are aware, the motions to be heard on June 3, 1994 primarily involve the [REDACTED] and [REDACTED] matters. I respectfully suggest that you need to discuss your request with counsel in those cases.

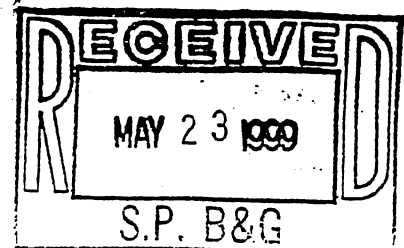
Very truly yours,

GREEN, McMAHON AND HEED

Peter W. Heed

PWH:cam

cc: Client
cc: Mark A. Abramson, Esquire
cc: Peter A. Gleichman, Esquire
cc: James E. Higgins, Esquire ✓



GRIFFIN, SWANSON & GLEICHMAN, P.A.

9915

ATTORNEYS AT LAW
56 MIDDLE STREET
P.O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

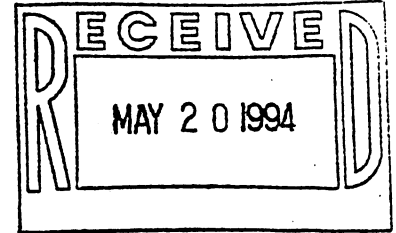
CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN
PETER A. GLEICHMAN
CHARLES J. GRIFFIN, RETIRED

TEL 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

to RPL
Does this seem to be correct? *John*

J
May 19, 1994



[Redacted], Clerk
[Redacted]
[Redacted]

RE: [Redacted] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester, Inc.,
and Monsignor Gerard Boucher
Docket Number: [Redacted]

Dear [Redacted]:

You will find enclosed for filing with the Court Plaintiff's Memorandum of Law in Support of Objection to Motion to Dismiss on the Basis of Equal Protection, copies of which have been forwarded by mail this date to James E. Higgins, counsel for Defendants Roman Catholic Bishop of Manchester and Monsignor Gerard Boucher.

Sincerely,

Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: James E. Higgins, Esquire
Mark A. Abramson, Esquire
[Redacted]

9916

CONFIDENTIAL FAX

TO: George P. Dickson, Esq.
394 Elm Street, Box 1
Milford, NH 03055
(FAX) 603-673-8607

Mark A. Abramson, Esq.
Abramson, Reis & Brown
1819 Elm Street
Manchester, NH 03104
(FAX) 603-666-4227

✓ James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P.O. Box 3701
Manchester, NH 03105-3701
(FAX) 603-627-8121

Peter A. Gleichman, Esq.
Griffin, Swanson & Gleichman
P.O. Box 598
Portsmouth, NH 03802-0598
(FAX) 603-433-1197

Peter W. Heed, Esq.
Green, McMahon & Heed
28 Middle Street
Keene, NH 03431
(FAX) 603-357-5899

No. Pages: 3 (including cover sheet)

FROM: Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

TEL.#: (505) 842-1987
FAX #: (505) 829-3706

Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

9917

Tel: (505) 842-1987 / Fax: (505) 829-3706

May 18, 1994

RE: [REDACTED]
[REDACTED] v. MacRae, et als

[REDACTED] County Case
[REDACTED] v. MacRae, et al

[REDACTED] County Case
[REDACTED] v. MacRae, et al

Counsel:

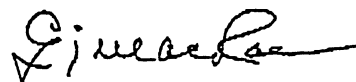
The attached notice for pre-trial conference indicates that a hearing on certain motions in the above captioned matters is to take place on June 3, 1994 at 1:30 PM before Judge Conboy.

As you know I have been a pro se defendant in these cases. I would like to ask your cooperation in requesting a postponement of the pre-trial conference for approximately thirty days. I have consulted with counsel in New Hampshire who intends to enter an appearance on my behalf, but requires time to review the matters and cannot be prepared by June 3.

It would be both cost prohibitive and time consuming for me to travel to New Hampshire for a June 3rd conference. I would appreciate it if you would agree to a thirty day postponement in order to allow my counsel time to review these matters and enter an appearance.

Thank you for your cooperation in this matter.

Sincerely,



Gordon J. MacRae

THE STATE OF NEW HAMPSHIRE
SUPERIOR COURT

9918

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Clerk

May 10, 1994

NOTICE OF HEARING

[REDACTED]

vs. Gordon MacRae, et al

[REDACTED]

vs. Gordon MacRea, et al

[REDACTED]

vs. Gordon MacRea, et als

A PRE-TRIAL CONFERENCE in the above matters and a hearing on MOTION TO DISMISS and MOTION TO STAY DISCOVERY in [REDACTED]; and MOTION TO DISMISS and MOTION TO AMEND WRIT OF SUMMONS in [REDACTED]

is scheduled at the County Court House at [REDACTED]

on JUNE 3, 1994 at 1:30 PM before Judge Conboy.

NOTE: When contacting this office with any inquiry about this case, please refer to the docket number listed above. In addition, please bring this notice with you on the day of the hearing.

JMS/jel

Copy to: George P. Dickson, Esq.
394 Elm Street, Box 1
Milford, NH 03055

Gordon MacRae
P.O. Box 10
Jemez Springs, NM 87025-0010

Mark A. Abramson, Esq.
ABRAMSON, REIS & BROWN
1819 Elm Street
Manchester, NH 03104

Peter A. Gleichman, Esq.
GRIFFIN, SWANSON & GLEICHMAN
P.O. Box 598
Portsmouth, NH 03802-0598

James E. Higgins, Esq
SHEEHAN LAW FIRM
P.O. Box 3701
Manchester, NH 03105-3701

Peter W. Heed, Esq.
GREEN, MCMAHON & HEED
28 Middle Street
Keene, NH 03431

Honorable: Carol Ann Conboy