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COPY

THE STATE OF NEW HAMPSHIRE

ROCKINGHAM COUNTY, SS.

SUPERIOR COURT

[REDACTED]
VS.

GORDON MACRAE AND
THE ROMAN CATHOLIC BISHOP OF MANCHESTER, INC., ET AL

FIRST SET OF INTERROGATORIES PROPOUNDED BY COUNTER-DEFENDANT
TO BE ANSWERED BY PLAINTIFF [REDACTED]

The following constitute interrogatories propounded by Counter-Defendant, Gordon J. MacRae, to be answered by the Plaintiff, [REDACTED] under oath, pursuant to, and within the time prescribed by, New Hampshire Superior Court Rule 36. All answers must be answered in full and contain all facts and evidence which substantiate the answer as it is given and which would be presented to the Court. When a question calls for either an affirmative or a negative answer, do not limit your answer to a simple affirmative or negative. Explain your answer in detail. State the facts and reasons for your answer fully and completely. If there are any documents which substantiate any answer, or any explanation to any answer, specifically refer to them and attach copies to these interrogatories, whether or not they are requested.

These interrogatories shall be deemed continuing so as to require supplemental answers if the Counter-Defendant obtains further information between the time answers are served and the time of a hearing on the merits regarding this matter.

1. Please Identify yourself stating the following:
 - A. Your full name and any other names by which you have been known.
 - B. Your date and place of birth.
 - C. Your Social Security Number.
 - D. Your present address.
 - E. Your marital status and the name and date of birth of your spouse.
 - F. The names and dates of birth of your children (if any).

ANSWER:

2. Please state the following:
- A. Your current occupation and how long you have worked there.
 - B. The name and address of your current employer.
 - C. Describe your current job responsibilities.
 - D. State your current annual income.
 - E. The current combined annual income of your household.

ANSWER:

3. List all addresses at which you have lived, and with whom, from June 15, 1983 to the present, and your reason for leaving each address.

ANSWER:

4. Please list your criminal record including any and all times you have been arrested, when, where, each charge, and the disposition of each charge.

ANSWER:

5. List the names and addresses of all schools attended from Kindergarten and/or grade one through college or professional school and the year(s) of attendance.

ANSWER:

6. Please describe any behavior and/or discipline problems you experienced while a student at Hampton Academy Junior High School.

ANSWER:

7. Please describe the process by which you came to be enrolled in Sacred Heart School in Hampton, NH in September, 1983, including who enrolled you, when you enrolled, the reason(s) for your enrollment, etc.

ANSWER:

8. Please describe any behavior and/or discipline problems you experienced at Sacred Heart School, and how these problems were addressed, including who was involved.

ANSWER:

9. Please state when and why you left Sacred Heart School in Hampton.

ANSWER:

10. Please describe the circumstances which led to your enrollment at St. Thomas Aquinas High School in Dover.

ANSWER:

11. Please describe the circumstances which led to your dismissal from St. Thomas Aquinas High School including the names of all persons involved and when this occurred.

ANSWER:

12. Please describe your school experience at Winacunnet High School, including your relationships with peers, teachers and school authority.

ANSWER:

13. Please describe all professional and/or job and career training you have received including degrees held, institution attended, certification, and date and place of each.

ANSWER:

14. Please list all employment held in the last ten years, the name of your supervisor in each, the address of each, and your reason for leaving each place of employment.

ANSWER:

15. Approximately how many times do you allege that you visited the Hampton rectopry while Gordon Macrae was assigned there in 1982 and 1983?

16. During these alleged visits who would usually answer the door when you came to the rectory?

ANSWER:

17. During these alleged visits where in the rectory would you usually meet with Gordon MacRae?

ANSWER:

18. Please indicate who you have seen in the Hampton Rectory during these alleged visits.

ANSWER:

19. Please describe how you were referred for counseling with Ms. Judy Patterson in 1983, including who referred you and why, and what was the nature of these counseling sessions.

ANSWER:

20. Please describe what the allegation(s) were that you made to Ms. Patterson about Gordon MacRae in November, 1983.

ANSWER:

21. Please state how long you attended counseling sessions with Ms. Patterson and why these sessions ended.

ANSWER:

22. Please describe what allegation(s) were made by you about Gordon MacRae in March, 1986.

ANSWER:

23. What precipitated your bringing new allegation(s) about Gordon MacRae in March, 1986, and state each person to whom you made these allegation(s).

ANSWER:

24. Please describe what was referred to as "the spider game" including whose terminology this was and what, exactly, you alleged to have occurred as you described it to Dr. Brown in March of 1986.

ANSWER:

25. Please describe, in detail, the incident in which you allege that Father Gerard Boucher walked in on you and Gordon MacRae in which you allege that he witnessed inappropriate behavior by Gordon MacRae.

ANSWER:

26. Please describe any and all conversations you allege to have had with Father Gerard Boucher in which you expressed concern or made allegations about Gordon MacRae. Please indicate where these alleged conversations took place.

ANSWER:

27. Please indicate approximately when these alleged conversations took place, i.e., before Gordon MacRae left the Hampton parish on June of 1983, or after, or both.

ANSWER:

28. Please describe Father Gerard Boucher's responses to you (if any).

ANSWER:

29. Please describe any and all conversations you allege to have had with Father James Watson in which you expressed concern or made allegations about Gordon MacRae, and indicate where these alleged conversations took place and when, and what was the content.

ANSWER:

30. Please describe Father Watson's responses to you, if any.

ANSWER:

31. Please indicate anyone else to whom you made allegations about Gordon MacRae stating what, exactly, the allegations were, when they were made and to whom.

ANSWER:

32. Please describe any and all conversations you have had with Monsignor John Quinn of the Diocese of Manchester about the allegations you have made about Gordon MacRae.

ANSWER:

33. Please describe any and all conversations you have had with Elizabeth Davis of the Division of Children and Youth Services about the allegations you have made about Gordon MacRae including the location and content of those discussions.

ANSWER:

34. Please describe any and all conversations you have had with Marilyn Fraser of the Division of Children and Youth Services regarding the allegations you have made about Gordon MacRae including the location and content of those discussions.

ANSWER:

35. Please describe your counseling with Dr. Brown at Winacunnet High School including what precipitated the counseling and what was the nature of the counseling sessions.

ANSWER:

36. Please describe the police report and complaint made by you and/or members of your family alleging harassment of you by a [REDACTED] 1985.

ANSWER:

37. Have you ever made any other reports or allegations alleging harassment, assault, abuse or any other form of misconduct against any other person? If so, please describe these.

ANSWER:

38. Please describe comments alleged to have been made by you to certain individuals in the Summer 1983 after Gordon MacRae left the Hampton parish that "I have a hit list and Gordon is number one on it." Please indicate who this remark was made to, and why.

ANSWER:

39. Several persons have alleged that you made comments to them that you were angry at Gordon MacRae in 1983 after he left Hampton because he did not keep in touch with you. Please describe these alleged comments including your motivation for making them and to whom they were made.

ANSWER:

40. Please describe any and all conversations you have had with Detective Wardel of the Hampton Police Department concerning the allegations you have made about Gordon MacRae including when these conversations took place, where, and what was the content.

ANSWER:

41. Please describe in detail the conversation you had with Detective McLaughlin in 1988 about Gordon MacRae including how the conversation was initiated and by whom, what, exactly, was said and by whom, what allegations you made, what Detective McLaughlin said to you, where it took place, etc.

ANSWER:

42. Please indicate and describe any other meetings and/or conversations you have had with Detective McLaughlin of the Keene Police Department subsequently to, or prior to, 1988.

ANSWER:

43. Please describe the gift you presented to Gordon MacRae on April 9, 1983 in the presence of your parents at the Hampton rectory.

ANSWER:

44. Please indicate if you attended the farewell reception held for Gordon MacRae in the parish hall of the Hampton Parish in June of 1983, and, if so, please indicate whether you signed the guest book.

ANSWER:

45. Please indicate whether you presented Gordon MacRae with any notes or cards and/or gifts at the time he left the Hampton Parish in June of 1983, and, if so, describe these.

ANSWER:

46. Please list the names and addresses of all counselors, therapists, psychologists, psychiatrists, psychotherapists, social workers, and other mental health professionals from whom you have received services since June, 1982 including the approximate date(s) of treatment.

Respectfully Submitted:

Gordon J. MacRae

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


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

Dated: February 22, 1994

signed: _____


date: _____

STATE OF NEW HAMPSHIRE
Rockingham, SS.

Personally appeared the above named  who upon oath declared that the statements in the foregoing Interrogatories by him subscribed are true to the best of his knowledge and belief.

Justice of the Peace / Notary Public