



1 Q When?

2 A Shortly after 9/11.

3 Q Okay. What was the purpose of that?

4 A I went for some care.

5 Q Medical?

6 A Yes.

7 Q Okay. Was -- was that some kind of
8 rehab?

9 A No.

10 Q Okay. Was it a purely medical issue,
11 physical?

12 A I had a series of seven surgeries.

13 Q Okay. I don't mind telling you I've
14 been dreading doing this, but I need to go over
15 Rosson 698 with you. I'll mark it as -- This is
16 Exhibit 4.

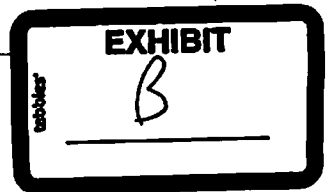
17 MR. GREY REDDITT:

18 Okay.

19 (PLAINTIFF'S EXHIBIT NUMBER 4
20 WAS MARKED FOR IDENTIFICATION.)

21 MR. KENNEDY:

22 Q I'll give you a chance to take a look
23 at it.



1 MR. GREY REDDITT:

2 And I'm fine with going into it
3 generally, but there may be areas that I cut you
4 off and instruct him not answer.

5 MR. KENNEDY:

6 Just state the reason why.

7 MR. GREY REDDITT:

8 I will.

9 A Okay.

10 MR. KENNEDY:

11 Q When did you --

12 Did you author this?

13 A I did.

14 Q Okay. When did you author this?

15 A Well, there's a date on it, and I would
16 think that that's pretty close to the time, if
17 not proper, of 2-16.

18 Q Okay. Of 2014? Is this --

19 A Yes.

20 Q Is this your handwriting, this date?

21 A I can't say that is or not. I don't
22 recognize it.

23 Q Okay. Is this your handwriting here?

1 A No.

2 Q Do you know whose it is?

3 A No.

4 Q Okay. Do you know how it came to be on
5 this piece of paper?

6 A No.

7 Q Okay. Who made this allegation against
8 you? And I don't necessarily want their name.
9 It's just what -- I see it's a 16-year-old. Was
10 this a student or a parishioner or who was this
11 person in relation to you?

12 A It was an individual who was working
13 for extra money at a previous assignment.

14 Q Which previous assignment?

15 A St. Lawrence in Fairhope.

16 Q Okay. I see it was -- This says it was
17 a 16-year-old. Have you kept any records as to
18 relates to this allegation against you?

19 A No.

20 Q Okay. What was the child's gender?

21 A Male.

22 Q Do you know what in particular
23 was -- that was alleged that you did?

1 A The accusation claimed that there was a
2 two-year relationship.

3 Q Okay. From the time -- Did it run from
4 the time this person was 16 to 18 or 14 to 16?

5 A The accusation claimed it was from 16
6 to 18.

7 Q Okay. I see that it says the
8 Archdiocese reported the accusation to the
9 District Attorney. Was that the District
10 Attorney in Baldwin County?

11 A I do not know.

12 Q Okay. Did you have to give any kind of
13 interview with the District Attorney?

14 A No.

15 Q Or any police officers?

16 A No.

17 Q Okay.

18 A I requested a lie detector test
19 immediately, took it, and it was determined that
20 I was not deceiving.

21 Q Who administered that test?

22 A A private company. I don't know who.

23 Q Do you know where it was located?

1 A Baldwin County.

2 Q Do you know what town or city in
3 Baldwin County?

4 A Daphne.

5 Q Okay. Do you know if that company's
6 still in business?

7 A I do not know.

8 Q Okay.

9 A I know he said he was a 20-year veteran
10 of the police department and has been doing this
11 for a couple of decades.

12 Q Do you know who -- what that person's
13 name was?

14 A I don't recall.

15 Q Who arranged that lie detector test?
16 Was that something that you privately arranged
17 or --

18 A No. It was a third-party private
19 detective hired by the Archdiocese.

20 Q I guess what I'm asking, did the
21 Archdiocese instruct you to go give that lie
22 detector test or did you --

23 A I requested it immediately.

1 Q Okay. Okay. Do you know if Alabama
2 Department of Human Resources instituted any kind
3 of investigation in relation to this?

4 A I do not know.

5 Q Okay. And do you know if it was
6 reported to DHR?

7 A I do not know.

8 Q Did you report it to DHR?

9 A No.

10 Q Okay. Who did the alleged victim
11 report the allegations to?

12 A My understanding is they reported it to
13 Father James Cink in charge of Catholic -- It
14 would be Child Protection for the Archdiocese.

15 Q Okay. Do you know if the Archdiocese
16 conducted an investigation?

17 A I was told they did.

18 Q Did they interview you as part of that
19 investigation?

20 A Twice.

21 Q Okay.

22 A Plus a private detective, plus the lie
23 detector.

1 Q Do you know who that private detective
2 is?

3 A No. I --

4 Q Do you have any way of finding out who
5 it is?

6 A I'm sure you can ask the Archdiocese.

7 Q Okay. How long did the investigation
8 take? Do you recall?

9 A I don't know.

10 Q Who was the Archbishop at that time?

11 A Rodi.

12 Q Okay.

13 A At the time of the allegation.

14 Q Would that have been in 2005?

15 A The allegation occurred in 2014.

16 Q Okay. The allegation -- So the
17 allegation first presented itself earlier this
18 year.

19 A Yes.

20 Q But what was alleged -- the
21 relationship that was alleged supposedly happened
22 nine years ago?

23 A They claimed, yes.

1 Q Okay. Is there any lawsuit filed as it
2 relates -- in relation to this?

3 A No.

4 Q Okay. Is this the only time that
5 you've ever been accused of inappropriately
6 touching a child, a minor?

7 MR. GREY REDDITT:

8 Object to the form.

9 A The accusation's a two-year
10 relationship, and it's the only time I was ever
11 been accused of anything inappropriate with a
12 minor ever.

13 MR. KENNEDY:

14 Q Okay. This person's now an adult;
15 correct? Presumably?

16 A I presume, yeah.

17 Q I mean, who -- Do you know the person's
18 name?

19 A I do.

20 Q What is it?

21 MR. GREY REDDITT:

22 I'm going to instruct him not to
23 answer.

1 MR. KENNEDY:

2 Based on what?

3 MR. GREY REDDITT:

4 It's not relevant. I mean, your whole
5 line of questioning is not relevant, but --

6 MR. KENNEDY:

7 I mean, it is a document y'all
8 produced.

9 MR. GREY REDDITT:

10 There's not a discussion of the
11 identity in the document.

12 MR. KENNEDY:

13 Q Have you addressed this with
14 your -- well, with St. Pius as a parish from the
15 pulpit?

16 Do y'all call it a pulpit?

17 A Yes.

18 Q When did you first address it with
19 the -- with the parish?

20 A Presumably on the date on that
21 document.

22 Q Okay. Is this something -- Did you
23 write this -- I guess a prepared statement that

1 you then spoke?

2 A Yes.

3 Q Okay. That's all I have about it.

4 Do you have any Facebook pages for St.
5 Pius?

6 A Repeat the question, please.

7 Q Do you maintain any Facebook pages for
8 St. Pius?

9 A No.

10 Q Okay. Do you know if St. Pius has an
11 official Facebook page?

12 A I can't say it's official, but I think
13 there are some parents who have some out there.

14 Q Okay. Do you know if the Archdiocese
15 has a Facebook page that it runs?

16 A I do not know.

17 Q Did you ever have any conversations
18 with Kristen Rosson about tuition?

19 A I've never spoken to her.

20 Q Have you ever corresponded with her in
21 writing?

22 A I don't know who she is.

23 Q Well, she's -- she's the mother of the

IN THE CIRCUIT COURT OF
MOBILE COUNTY, ALABAMA

* * * * *

T.R., a minor, by and through
her legal custodian, Kristen
Rosson,

Plaintiff,

VS.

ST. PIUS X SCHOOL, et al.,

Defendants.

* * * * *

ORIGINAL

CIVIL ACTION NO.
CV-2013-901279

The video deposition of REVEREND
JOHNNY SAVOIE, taken at The
Kennedy Law Firm, 359 St. Francis
Street, Mobile, Alabama, on the
30th day of September 2014,
commencing at approximately
8:48 a.m.

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A P P E A R A N C E S

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20 ALSO PRESENT: GWEN BYRD

21 VIDEOGRAPHER: CARI SEARCY
22 ALLGOOD CREATIVES

23 LOIS ANNE ROBINSON, RDR
COURT REPORTER

I N D E X

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By Mr. Kennedy	7

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EXHIBITS

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S T I P U L A T I O N

1
2 It is stipulated by and between the
3 parties hereto and their respective attorneys at
4 law that the deposition on oral examination of the
5 witness, REVEREND JOHNNY SAVOIE, may be taken
6 before Lois Anne Robinson, Registered Diplomate
7 Reporter, Notary Public for the State at Large, and
8 that the said deposition shall be taken in
9 accordance with the provisions of the applicable
10 sections of the Alabama Rules of Civil Procedure.

11 It is further stipulated that all notices
12 provided for by said applicable sections of the
13 Alabama Rules of Civil Procedure are waived, as is
14 the signing and certification of said Lois Anne
15 Robinson, and all other requirements and
16 technicalities of every sort regarding the taking
17 and filing of the deposition, except as hereinafter
18 set out.

19 All objections save as to the form of
20 questions asked are reserved until the time of
21 trial, in accordance with the applicable provisions
22 of the said Alabama Rules of Civil Procedure.

23 The original of this transcript will be

1 delivered to Christine Hernandez, Esquire.

2 It is further stipulated and agreed that
3 the witness hereto reserves the right to read and
4 sign said deposition as provided for by said
5 Alabama Rules of Civil Procedure.

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I, Lois Anne Robinson, Court Reporter,
certify that on this date, as provided by the
Alabama Rules of Civil Procedure and the foregoing
stipulation of counsel, there came before me at
Mobile, Alabama, on the 30th day of September 2014,
commencing at 8:48 a.m., REVEREND JOHNNY SAVOIE,
witness in the above cause, for oral examination,
whereupon the following proceedings were held: