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ATTORNEY FOR PLAINTIFF: Eric Zapala

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

ERIC ZAPALA,)	CASE NO. 743786
)	
Plaintiff,)	
vs.)	
)	
FATHER RICHARD T. COUGHLIN,)	PLAINTIFF ERIC ZAPALA'S
THE ROMAN CATHOLIC BISHOP OF)	RESPONSES TO SPECIAL
LOS ANGELES, A CORPORATION)	INTERROGATORIES
SOLE, THE ROMAN CATHOLIC)	
BISHOP OF ORANGE, A)	
CORPORATION SOLE, MONSIGNOR)	SET NO. ONE
JOHN URELL, ORDER OF)	
NORBERTINE FATHERS, BOYS CHOIR))	
SCHOOL OF ORANGE COUNTY, A)	
NON PROFIT ORGANIZATION dba)	
THE ALL AMERICAN BOYS CHORUS,)	
ST. ANTHONY CLARET CATHOLIC)	
SCHOOL, AND DOES 2-50,)	
INCLUSIVE,)	
)	
Defendants.)	

PROPOUNDING PARTY: DEFENDANT, THE ROMAN CATHOLIC ARCHDIOCESES OF
LOS ANGELES, a corp. sole
RESPONDING PARTY: PLAINTIFF, ERIC ZAPALA
SET NO. ONE

PRELIMINARY STATEMENT

Plaintiff, ERIC ZAPALA, ("responding party") hereby makes the

1 following responses to Defendant's Special Interrogatories, Set
2 Number One.

3 These responses are made solely for the purpose of this
4 action. Each response is subject to all appropriate objections
5 (including but not limited to objections concerning competency,
6 relevancy, materiality, propriety and admissibility) which would
7 require the exclusion of any statement contained herein if the
8 interrogatory was asked of, or any statements contained herein if
9 the answer was given by a witness present and testifying in Court.
10 All such objection and grounds are reserved and may be interposed
11 at such later time.

12 This responding party has not completed his investigation of
13 the facts relating to this action, has not yet completed
14 discovery, and has not completed preparation for trial.
15 Consequently, the following responses are given without prejudice
16 to the responding party's right to produce all evidence, whenever
17 discovered, relating to proof of subsequently discovered material
18 facts.

19 Except for the explicit facts admitted herein, no admissions
20 of any nature whatsoever are implied or should be inferred. The
21 fact that an interrogatory herein has been answered should not be
22 taken as an admission or acceptance of the existence of any facts
23 set forth or assumed by such interrogatory, or that such answer
24 constitutes admissible evidence.

25 Pursuant to the provisions of Code of Civil Procedure,
26 Section 2031, plaintiff, ERIC ZAPALA, hereby submits responses to
27 your interrogatories.

28 \\\

1 Various times while seeing him as a therapist since October
2 1994.

3 Patrick O'Neill
4 717 Windsor Lane
5 Key West, FL 33040

6 Various times between approximately September 1993 until
7 present. We have never compared specifics of our sexual abuse
8 experiences with Richard Coughlin. The basis of our relationship
9 has been to support each other emotionally.

10 Erin Brady
11 315 N. Canyon Blvd.
12 Monrovia, CA 91016

13 I have discussed my allegations with Erin Brady at various
14 times from September 1994, to the present.

15 - persons attending SNAP meetings, whose identities are
16 either unknown, or whose identities I chose to keep confidential,
17 per my agreement as a SNAP member.

18 Response to Interrogatory No. 3:

19 Dr. Loren Anderson, and Gerry Owens, see response to Special
20 Interrogatory No. 1 for the additional information requested in
21 this interrogatory.

22 Response to Interrogatory No. 4:

23 Kavanagh Residence
24 1280 Flower Street
25 Anaheim, CA

26 Approximately during Summer of 1974.

27 Richard Coughlin was supervising a pool party with several of
28 the boys. No other adults were present. I was in the master
bedroom with several other boys. Richard Coughlin was leading a
game of "spin-the bottle". I believe the winner of the spin had
to kiss Richard Coughlin, or something like that. Richard

