

INTERROGATORY NO. 11: Please list any and all trips of more than 25 miles you have made with any minor member of the church and identify the persons who were with you, identify anyone over the age of 18 who as with you, all locations where you went during the trips, the purpose of the trips, what was done during the trips and if the trips involved overnight stays, please state the location of where you stayed, including the sleeping arrangements. Also, please state if you paid any of the expenses of any of the minor members for any such trip.

Response: Objection. Overly broad and unduly burdensome. Without waiving the foregoing objections, Defendant Mickey states in the last ten years he does not recall making any trips of more than 25 miles with any minor member of the church.

INTERROGATORY NO. 12: Have you ever slept overnight in the same bed with a member of a parish within the Diocese of Memphis? If so, please identify the person, the date, the location and the reason why you would have spent the night in bed with the person.

Response: Defendant Mickey only recalls two situations where he slept in the same bed with a member of a parish. No minors were involved, and no sexual activity occurred. On one occasion, he spent the night at the home of [REDACTED] after conversing with him and his family into the early morning hours. On another occasion, Defendant Mickey spent the night in a hotel with [REDACTED] while traveling home from [REDACTED], Georgia. The hotel did not have rooms available with separate beds when they checked in that night. They agreed to share a king size bed.

INTERROGATORY NO. 13: Identify each and every medical, psychiatric,