

**HEARING PANEL**  
**Disciplinary Board**  
**Episcopal Diocese of Massachusetts**

The Episcopal Diocese of Massachusetts

v.

EDOM Title IV Matter

The Reverend Douglas Anderson,  
Respondent

The Episcopal Diocese of Massachusetts Motion to Redact Complainant's  
Name and Identifying Information

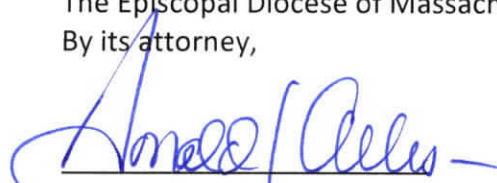
The Episcopal Diocese of Massachusetts (the "Diocese"), through counsel, respectfully requests that pursuant to Title IV, Canon 4.13.3(b), the Hearing Panel require the redaction of the Complainant's name and identifying information from the materials posted and disseminated to the public in this matter. In support of this motion the Diocese states that the Diocese and the Complainant are concerned that, inasmuch as Respondent still has considerable ties to and influence with the community in Texarkana, Texas, the public dissemination of her identifying information will necessarily subject Complainant to the threat of harassment and unwanted and unwarranted intrusion into her personal life.

Moreover, Respondent will not be prejudiced by the granting of this motion. Respondent knows who the Complainant is, has already had access to the Investigator's Report in this matter, and has been provided by the Diocese with numerous documents and materials supporting the alleged Offenses.

The requested redactions are contained in the attached Church Attorney Statement and Respondent's Response thereto. The Diocese submits that there is good cause for the Hearing Panel to conclude that the requested redactions are necessary to protect the Complainant.

Wherefore, the Diocese respectfully requests that the within motion be allowed.

The Episcopal Diocese of Massachusetts  
By its attorney,

  
Donald J. Allison