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March 7, 2023

Via Email

The Reverend Nancy Gossling
President of the Hearing Panel
Episcopal Diocese of Massachusetts
138 Tremont Street
Boston, MA 02111

Re: *The Episcopal Diocese of Massachusetts v The Reverend Douglas E. Anderson*

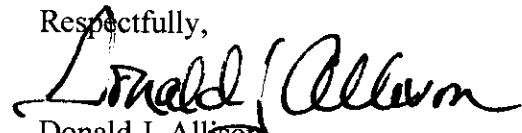
Dear Rev. Gossling

This is in response to Respondent's Counsel's letter to you dated March 3, 2023. While I wholeheartedly agree with the Hearing Panel's response to Counsel's letter, I am writing to clearly state the Diocese's position on the central issue raised by that letter.

Canon IV.13.3(b) provides in relevant part "the Hearing Panel, at its discretion and for good cause, *to protect any Injured Person or allegedly Injured Person*, may require the redaction of documents" (emphasis added). Counsel's reading of that Canon, as set out in his letter, misses the point and intent of the Canon; that is, the protection of Injured Persons. To read the Canon literally, as Counsel argues, will eviscerate the very protection afforded by the Canon.

The only reasonable interpretation of the language of Canon IV.13.3(b) is conclude that its scope extends not merely to the redaction of documents but also the purposeful dissemination of the very same information for which redaction is being sought. That being so, it is difficult to fathom that Counsel honestly believes that the Canons permit to him to broadcast an Injured Persons name and identifying information at a Public Hearing on a motion to protect that Injured Person from having her name and identifying information published.

Respectfully,


Donald J. Allison
Church Attorney