

NEIL T. DUDDY

1 Q. Yes. Let me help you, Mr. Duddy, may I -- or
2 I won't stop you from looking at your notes.

3 A. Well, I can't find it; I don't recall.

4 Q. Well, let me read to you, your Answers to
5 Interrogatories in 1981.

6 "Does the English language manuscript
7 at any place state in substance the following:
8 remaining in the church does not exactly
9 promise the victims of Lee's filibics (sp)
10 anything better. Publicly humiliated members
11 are ostracized for a while and excluded from
12 inner personal relationships."

13 "In conversation, we have learned that
14 Local Church people no longer speak with those
15 who have been picked out by Lee's moods and
16 avoids them on the street."

17 "This period of ostracism is a
18 missapplication of the Old Testament
19 instruction regarding uncleanness."

20 "Rapoport confirmed that the fear of
21 being picked out or the event itself have
22 ruined the nerves of a number of Anaheim church
23 members to such an extent that they had to be
24 admitted to psychiatric clinics, but to the
25 majority these public falibics [phonetic] are a
26 suitable means of generating a higher measure

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1 of spirituality. Lee calls this the breaking
2 of the outer man, the end, therefore, justifies
3 the means."

4 And the question was "Does the English
5 language manuscript any place state in
6 substance the following," and your answer was
7 "Notwithstanding the answer in No. 251,
8 information about the public" -- "about the
9 subject, public humiliation of members, which I
10 intended to convey in the English manuscript,
11 came to me from those persons listed on Exhibit
12 A who experienced or witnessed it."

13 "Discovery is pending with respect to
14 documentation which I have not obtained at this
15 time."

16 And then 254 -- oh, I beg your pardon. That was
17 252, and 253 was just,

18 "Objection on the same grounds as No.
19 251."

20 And 254 was "If your answer to the
21 preceding Interrogatory is affirmative, please
22 state: A, whether you intended to convey that
23 statement to the readers thereof; B, all facts
24 upon which you base said statement; C, the
25 names and addresses of all persons having
26 knowledge of any of said facts; D, identify

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1 each and every document that refers to, relates
2 to, or contains any information relating to any
3 of said facts."

4 And your answer was,

5 "Notwithstanding the answer in No. 253,
6 the subject of members treatment for emotional
7 breakdown has not been documented by me. I
8 have relied on various conversations with the
9 persons listed on Exhibit A, especially
10 Max Rapoport."

11 Does that confirm that you don't know the names of
12 anybody that was in the hospital or went into the
13 hospital?

14 A. I believe I said I don't recall, yes. I stand
15 by it.

16 Q. Well, Mr. Duddy, have you ever confirmed one
17 hospitalization by an Anaheim church member that was due
18 to some form of public rebuke or public humiliation? And
19 by confirmed I mean checked with the hospital?

20 A. No.

21 Q. All right. Mr. Duddy, don't you think you had
22 an obligation to check, at least, one case to see if what
23 these people were telling you was true?

24 A. I believe there was sufficient testimony on
25 agreement of those people.

26 Q. Listen to my question. Don't you believe you