

Oral and Videotaped Deposition - George Kachavos
September 12, 2007

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CAUSE NO. 0703807D

JOHN DOE I, JOHN DOE II,) IN THE DISTRICT COURT
THROUGH HIS MOTHER AS)
NEXT FRIEND OF JOHN DOE)
II, A VULNERABLE (NON)
COMPOS MENTIS) ADULT AND)
JOHN DO III,)

Plaintiffs,

v.

DALLAS COUNTY, TEXAS

REVEREND NICHOLAS E.)
KATINAS, PASTOR (FORMERLY)
OF HOLY TRINITY GREEK)
ORTHODOX CHURCH; HOLY)
TRINITY GREEK ORTHODOX)
CHURCH; THE GREEK ORTHODOX)
METROPOLIS OF DENVER BY)
AND THROUGH BISHOP ISAIAH)
OF DENVER IN HIS OFFICIAL)
CAPACITY, AND THE GREEK)
ORTHODOX ARCHDIOCESE OF)
AMERICA BY AND THROUGH)
ARCHBISHOP DEMETRIOS IN)
HIS OFFICIAL CAPACITY,)

Defendants.

95TH JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION

GEORGE KACHAVOS

September 12, 2007

ORIGINAL

Oral and Videotaped Deposition - George Kachavos
September 12, 2007

1 ORAL AND VIDEOTAPED DEPOSITION OF GEORGE
2 KACHAVOS, produced as a witness at the instance of the
3 Plaintiffs, and duly sworn, was taken in the
4 above-styled and numbered cause on September 12, 2007,
5 from 10:02 a.m. to 1:01 p.m., before Marion Ward,
6 Certified Shorthand Reporter in and for the State of
7 Texas, at the residence of Mr. George Kachavos, 4937
8 Edgewater Lane, Oldsmar, Florida, pursuant to the Texas
9 Rules of Civil Procedure and the provisions stated on
10 the record or attached hereto.

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Oral and Videotaped Deposition - George Kachavos
September 12, 2007

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APPEARANCES

FOR PLAINTIFFS:

Ms. Tahira Khan Merritt
TAHIRA KHAN MERRITT PLLC
8499 Greenville Avenue
Suite 206
Dallas, Texas 75231
(214)503-7300

FOR DEFENDANT GOAA:

Mr. James W. Grau
GRAU KOEN, P.C.
2711 N. Haskell Avenue
Suite 2000
Dallas, Texas 75204
(214)521-4145

FOR DEFENDANT HOLY TRINITY AND METROPOLIS OF DENVER:

Mr. Richard G. Miller
FLETCHER & SPRINGER, L.L.P.
8750 N. Central Expressway
16th Floor
Dallas, Texas 75231
(214)987-9600

ALSO PRESENT:

Videographer - Mr. Lee Nash

Oral and Videotaped Deposition - George Kachavos
September 12, 2007

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please swear in the witness.

GEORGE KACHAVOS,

the said witness, having been first duly cautioned and sworn to testify to the truth, the whole truth and nothing but the truth, testified under oath as follows:

EXAMINATION

BY MS. MERRITT:

Q. Would you tell us your name, please?

A. George Kachavos.

Q. Mr. Kachavos, where do you reside?

A. 4937 Edgewater Lane, Oldsmar, Florida.

Q. And how long have you lived here?

A. Two and a half years.

Q. Did you live in the Chicago area?

A. Yes, I did.

Q. And when did you live in Chicago?

A. Up until the year of 2003.

Q. Were you a parishioner at Assumption Church in Olympia Fields, Illinois?

A. Yes, I was.

Q. And how long were you a parishioner at Assumption Church in Illinois?

A. Approximately 30 years.

Q. Approximately what years was that?

A. It was 1968 to, I believe, about 1988.

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 A. The procedure was to call --

2 Q. -- Archdiocese?

3 A. -- the Diocese again, and you dealt directly
4 with the bishop or his assistant.

5 Q. And --

6 A. But ultimately, the decision was made by the
7 bishop. And I believe that that had to be confirmed by
8 the Archdiocese.

9 Q. And would you -- would the Board members
10 verbalize their complaints in specific terms -- in
11 other words, sexual misconduct ...?

12 A. I don't think there was any formal process. I
13 think this was done entirely verbally, orally and with
14 direct communication to the Diocese.

15 Q. And following that communication, the two to
16 three priests we are talking about after Katinas, were
17 they reassigned?

18 A. Yes, they were.

19 Q. I want to talk to you about Father Katinas.
20 And at some point prior to his reassignment to the
21 Dallas Church, was there a complaint that came to your
22 attention involving sexual misconduct?

23 A. Yes, there was.

24 Q. And can you tell me, first of all, how did you
25 hear about the complaint?

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 A. First time I heard about this problem was
2 through my wife. My wife said that she heard that
3 Father Katinas was involved in a sexual assault of a
4 minor.

5 Q. And your wife's name was ...?

6 A. Constance.

7 Q. And was your wife on a women's Board at that
8 church?

9 A. Yes.

10 Q. And what was the name of the women's Board?

11 A. AWS for "Assumption Women's Society".

12 Q. And do you recall at that time that you heard
13 about the complaint who else was on the Board, the
14 women's Board, other than your wife?

15 A. Well, there was a lot of women on the Board.
16 But if you are asking specifically where this
17 allegation came from -- is that what you are saying?

18 Q. Yes.

19 A. I believe -- I think I know, but I'm only --

20 Q. Okay, let me ask a better question.

21 A. Okay.

22 Q. That was a poor question.

23 Okay, so the first time you heard about a
24 sexual assault with a minor would have been from your
25 wife?

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 A. Yes.

2 Q. And the minor that was involved was -- what
3 was his name?

4 A. TS

5 Q. And his parents' names?

6 A. SS was the mother, and I forget the father's
7 name.

8 Q.

9 A. That is right.

10 Q. Okay.

11 And were they long-time parishioners at
12 the old church as well as the new church?

13 A. Yes. Their father was a founding member of
14 the church in 1916 -- after I reviewed the book there.

15 Q. Do you know if Mrs. SS was on the Board of
16 the AWS --

17 A. Yes.

18 Q. -- with your wife? Okay.

19 At the time that you were parish council
20 president, who was the vice-president?

21 A. I believe Gust Dickett was the vice-president,
22 but I'm not sure. I believe he was treasurer, and I
23 believe John Loumbas was the vice-president.

24 Q. Okay.

25 And Mr. Manta was the president before you

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 A. That is correct.

2 Q. And what did you do in response to that
3 report?

4 A. When she told me that, I said -- the first
5 thing I said to her is I didn't want her to talk to
6 anyone about this incident. And I told her that I was
7 going to call Gust Dickett, who was the treasurer; but,
8 more importantly, he was the attorney for the church.
9 And I wanted to meet with him.

10 Q. And did you have that meeting with
11 Mr. Dickett?

12 A. Yes, I did.

13 Q. And so Mr. Dickett, at the time, was the
14 treasurer to the church --

15 A. Yes --

16 Q. -- treasurer on the Board?

17 A. -- and the attorney for the church.

18 Q. Okay.

19 Had he -- what kind of legal transactions,
20 if you know, had he done for the church? Was he
21 involved in the purchasing of the property -- what type
22 of legal work was he involved with?

23 A. Routine work. I'm sure he handled the
24 contracts, the deeds, things of that matter.

25 Q. And so how many days or weeks went by between

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 when you heard of this report from your wife and you
2 talked to Mr. Dickett?

3 A. I called Mr. Dickett within a few days, and I
4 told him I would like to meet him after church at our
5 office, the church office.

6 Q. And did you do that?

7 A. Yes.

8 Q. Did you talk to Father Katinas about what you
9 had heard from your wife?

10 A. No, I never did.

11 Q. Okay.

12 So you met with Mr. Dickett. And what did
13 Mr. Dickett -- what did you tell Mr. Dickett?

14 A. I told Mr. Dickett that I heard this rumor
15 about an assault on TS by Father Katinas.

16 Q. Now, what did --

17 A. And I asked him what did he know about it.

18 Q. And what did he say?

19 A. And he said, "Yes", he knew about it.

20 Q. Did it appear --

21 A. And I asked him, "What exactly happened, if
22 you know?"

23 And he says that "Father Katinas knocked
24 TS to the floor."

25 I says "It sounded like a sexual assault."

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 He says "I don't know."

2 I says -- well, I said, "If it is true
3 then", I says, "Father Katinas cannot stay here."

4 Q. Okay.

5 MR. MILLER: Objection, responsiveness.

6 Q. (By Ms. Merritt) All right, let's break that
7 down a little bit.

8 A. Okay.

9 Q. So you met with Mr. Dickett just within a few
10 days of you hearing this --

11 A. Yes.

12 Q. -- about this assault from your wife.

13 And did it appear to you that Mr. Dickett
14 already knew about the TS incident?

15 A. Yes, he did.

16 Q. And what was his response to your question
17 about what happened?

18 A. His response was that Father Katinas knocked
19 TS to the floor.

20 Q. Did you get an indication of where the assault
21 occurred?

22 A. Yes, I asked him where. And he said it was in
23 Father Katinas' office, which is adjoining to the
24 general office there where I was meeting with Dickett.

25 Q. So would that have been in the phase one of

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1 the building process?

2 A. Yes.

3 Q. So we know that it would have been prior to
4 1976; is that accurate?

5 A. Yes.

6 Q. And did you ask Mr. Dickett to take some
7 action in response to this report in your capacity as
8 Board president?

9 A. Yes.

10 MR. MILLER: Objection, form.

11 Q. (By Ms. Merritt) Go ahead, you can answer my
12 question.

13 A. I told Gust Dickett that Father Katinas could
14 not stay here. And I told him he has got to take
15 whatever action is necessary to see that he is
16 reassigned.

17 Q. So after you had the -- and what did
18 Mr. Dickett say? What was his response?

19 A. The response was that -- and this is what
20 shocked me -- he said, "Father Katinas did a lot for
21 the family, and I don't understand why they are
22 doing this."

23 And I said, "What do you mean, what they
24 are doing?"

25 And he said at that time that, "I believe

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Examination by Ms. Tahira Khan Merritt

1 that they are considering going to the State's
2 attorney's office."

3 And I said, "That makes it even more
4 important that we get this problem resolved."

5 Q. What were your concerns, Mr. Kachavos, in
6 terms of removing Father Katinas from the church?

7 A. There was two concerns. One was Father
8 Katinas' family, his wife and five children in the
9 community. The other was the concern of the parish
10 itself. We very much relied on community support for
11 our fundraising events.

12 We had a weekly bingo. We had a big
13 annual festival. We had many bake sales. We were
14 highly dependent on income from the community. And the
15 idea of a headline that we had a sexual predator in our
16 parish just wasn't something that I could consider.

17 Q. So let me understand your testimony.

18 You were concerned about the scandal to
19 the Katinas family?

20 A. Yes.

21 Q. And is it accurate to say you were concerned
22 about the scandal to the family?

23 A. Absolutely.

24 Q. Were you concerned that there might be future
25 assaults on other minors if he was not reassigned?

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1 MR. MILLER: Objection, form.

2 MR. GRAU: Object to form.

3 A. Yes, I was.

4 Q. (By Ms. Merritt) Okay.

5 At the time, following your conversation
6 with your wife and with Mr. Dickett, did you have any
7 doubt in your mind that the assault against TS
8 was sexual in nature?

9 MR. GRAU: Object to form.

10 MR. MILLER: Objection, form.

11 A. There was no doubt in my mind that it was
12 sexual.

13 Q. (By Ms. Merritt) Mr. Kachavos, prior to your
14 wife coming and telling you about the sexual assault
15 and your conversation with Mr. Dickett, had you had an
16 opportunity to observe Father Katinas in other
17 incidents involving sexual misconduct?

18 A. Yes.

19 Q. And I want to talk to you about each of those.

20 How many of those would you say that --

21 A. There was --

22 Q. -- you had observed?

23 A. There was three.

24 Q. Okay.

25 Tell us about the first incident.

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Examination by Ms. Tahira Khan Merritt

1 A. The first incident, I had the occasion to go
2 to the -- I used to go to the church once a week for --
3 and sign checks. This particular time I went to the
4 church, I signed the checks, and I left. As soon as I
5 got home I realized that I left my business file at the
6 church. So I returned to the church about half an hour
7 later.

8 I opened the front door and -- to the
9 entrance, and there is a second door that goes into the
10 office. I opened the second door into the office,
11 Father Katinas was in his office and this young fellow,
12 a parishioner, was pulling his pants up and putting a
13 shirt on.

14 Q. How old would you say the parishioner was?

15 A. I think he was about 20.

16 Q. And his name?

17 A. You want his name?

18 Q. Yeah.

19 A. Dennis Mavragis.

20 MR. MILLER: I'm sorry, I couldn't hear.

21 THE WITNESS: Mavragis, M-A-V-R-A-G-I-S.

22 Q. (By Ms. Merritt) Okay.

23 And the next incident that you observed --
24 well, let me -- before I do that -- leave that first
25 incident -- were you parish council president at the

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 time of that incident?

2 A. Yes.

3 Q. So that we would -- we know that that would be
4 between '74 and '78?

5 A. Uh-huh, yes.

6 Q. And, but before you were notified about the
7 TS incident?

8 A. Before.

9 Q. Okay.

10 The second incident, can you tell us about
11 that?

12 A. The second incident, Father Katinas and I
13 were -- accompanied the basketball team to Detroit, and
14 we stayed at the Cadillac Hotel. After the basketball
15 game, we came to the hotel. We had dinner and went up
16 to our rooms. I had a room with Father Katinas; we had
17 separate beds. Went to bed about 11:00.

18 At about 1:30, I got up -- I just happened
19 to wake up -- I looked over and I didn't see Father
20 Katinas. So I went out in the hall and I went into one
21 of the rooms right away where the kids were. Some of
22 them were sleeping, still no Father Katinas. So I
23 called security. And security came up there, and I
24 told them, "Father Katinas is missing here."

25 So the security person went up and down

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Examination by Ms. Tahira Khan Merritt

1 the hall and came back a little later, and he said, "I
2 found him." And he said, "Come on over here." So he
3 took me to a room where it was like a storage room, and
4 Father Katinas was supposedly playing cards with three
5 of the basketball players.

6 Q. And how -- what were the ages about of these
7 boys that he was with?

8 A. They were teenagers.

9 Q. Under the year -- age of 18?

10 A. Yes. And it was at 1:30.

11 Q. And did that give you concern?

12 A. Yes, it did.

13 Q. In what way?

14 A. I felt it was very inappropriate, and I was
15 very suspicious of this conduct.

16 Q. "Suspicious" in terms of what?

17 A. Pedophilia.

18 MR. MILLER: I'm sorry, I couldn't hear you,
19 Sir.

20 THE WITNESS: Pedophilia.

21 Q. (By Ms. Merritt) The third incident,
22 Mr. Kachavos, can you tell us about that?

23 A. Third incident is when I went to the church.
24 I was just driving by there and I saw Father Katinas'
25 car out there, and I thought I had some time to kill.

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1 And I went into the church, but I couldn't find him.

2 Now, in the gymnasium on the second -- there is a
3 second floor there, there is a utility room.

4 And Father Katinas had made that kind of
5 an exercise room. And he installed a shower and had
6 some weights and so on. When I went there to the
7 church, I couldn't find him, I went to this -- to the
8 entrance door leading up to the second floor, but the
9 door was locked.

10 Q. Did you think that was unusual?

11 A. Yes, it was unusual. It should never be
12 locked.

13 So I knocked on the door. And, finally,
14 Father Katinas came down there. He was up there.
15 And --

16 Q. How was his appearance; what did he look like?

17 A. He looked normal, but there were a couple boys
18 up there.

19 Q. Were the boys teenagers?

20 A. Yes.

21 Q. And were they members of the parish?

22 A. Yeah, yes.

23 Q. And did that incident give you rise -- concern
24 you?

25 A. Yes.

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Examination by Ms. Tahira Khan Merritt

1 Q. And why?

2 A. It just seemed inappropriate that he would
3 lock the door and be up there with two young boys.

4 Q. Did you make any comments to Father Katinas
5 concerning locking the door?

6 A. I did. I told him -- I said, "That door
7 should never be locked."

8 Q. Did he agree with you?

9 A. Yeah, he did not disagree.

10 Q. The boys that were in the gymnasium, do you
11 remember their names?

12 A. No.

13 Q. The boys at the hotel, in the Cadillac Hotel,
14 do you remember their names?

15 A. No, they were all basketball players though.

16 Q. What was Father Katinas' involvement with the
17 basketball team there at the church?

18 A. Well, he had no direct connection to it. We
19 had our own independent coaches for the two different
20 basketball teams, the juniors and the seniors. Other
21 than that, he -- like, we accompanied them, we
22 chaperoned them to Detroit. I think he may have
23 chaperoned them to other events, but I don't remember.
24 I personally only can --

25 Q. You only went on one with him?

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Examination by Ms. Tahira Khan Merritt

1 A. No, he wasn't.

2 Q. Okay.

3 The three incidents that you just talked
4 to me about, did you tell anyone about those incidents?

5 A. No.

6 Q. Did you share that information with your wife?

7 A. With my wife, yes.

8 Q. Okay.

9 So the three incidents that we talked
10 about were before the information on the TS boy
11 came to you; is that true?

12 A. That is correct.

13 Q. Okay.

14 So after you have this conversation with
15 Mr. Dickett, when did you hear next from Mr. Dickett?

16 A. I saw him about a week or two later. And I
17 asked him to give me an update.

18 He said that, "Everything is moving
19 along."

20 Q. And what did that mean to you?

21 A. It meant to me that actions were being taken
22 to have Father Katinas reassigned.

23 Q. Okay.

24 Let me show you a document that I've
25 marked as Exhibit No. 7. And it is GOA Bate number --

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Examination by Ms. Tahira Khan Merritt

1 GOAA Bate number 00162 and 163.

2 (Exhibit 7 marked.)

3 Q. Mr. Kachavos, did I have you review that
4 letter for me prior to your deposition?

5 A. Yes.

6 Q. And what is the date of the letter?

7 A. June the 15th, 1978.

8 Q. And who is it to and who is it from?

9 A. It is to the Archbishop Iakovos.

10 Q. And he is the Archbishop -- at the time he was
11 the Archbishop of the --

12 A. -- North and South America.

13 Q. Right.

14 So the Archdiocese in New York; is that
15 right?

16 A. Right.

17 Q. Okay.

18 And who is it from?

19 A. Father Katinas.

20 Q. And after you reviewed that letter, is
21 there -- were there some statements in the letter that
22 you took issue with?

23 A. Yes.

24 Q. Can you tell us what those are?

25 A. In part of the letter down here where he

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1 Q. So Exhibit No. 7, Father Katinas is asking to
2 be reassigned; is he not?

3 A. Yes.

4 Q. And was it your understanding that the
5 reassignment was because of his complacency, the
6 complacency of the parish or for other reasons?

7 A. Other reasons.

8 Q. And what were those reasons?

9 MR. GRAU: Object to form.

10 MR. MILLER: Objection, form.

11 Q. (By Ms. Merritt) Based upon what you've told
12 us, what is your understanding of why Father Katinas
13 was reassigned from the Olympia Fields Church?

14 MR. GRAU: Object to form.

15 Q. (By Ms. Merritt) Go ahead, you can answer.

16 A. I believe it was reassigned because of the
17 fact that his conduct, his sexual misconduct, was known
18 to the Archdiocese. And this is the way they handled
19 this reassignment.

20 Q. Okay.

21 When you asked Mr. Dickett to take care of
22 the problem with Mr. with TS, what is
23 it that you expected him to do? What was your
24 expectation as parish council president?

25 A. Well, I expected Gust Dickett to communicate

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 MR. MILLER: Objection, form.

2 MR. GRAU: Join.

3 Q. (By Ms. Merritt) What was your expectation
4 following the conversation with Mr. Dickett?

5 A. In order to bring about reassignment,
6 information would have to be conveyed to the Diocese
7 and the Archdiocese before a reassignment could be
8 made. And after I read this letter here, it is obvious
9 to me that --

10 Q. Exhibit No. 7?

11 A. Exhibit No. 7 -- that this was the procedure
12 they used -- which I have to use the term "cover-up",
13 as to what actually happened.

14 Q. In the Exhibit No. 6, which is the
15 Assumption -- the '76 Assumption commemorative book --
16 are the family listed in that book?

17 A. When I reviewed it last night, I didn't find
18 them, no.

19 Q. Did they leave the church --

20 A. Yes.

21 Q. -- following this incident?

22 A. Yes.

23 Q. And would that have been unusual or -- is it
24 normal for parishioners that have been in the church
25 that long to leave without a reason?

George Kachavos - September 12, 2007
Examination by Ms. Tahira Khan Merritt

1 Q. Did you ask Mr. Dickett to try to persuade the
2 : family from taking legal action by either going
3 to the authorities, the police?

4 A. Yes, I told him that we don't want the
5 publicity, we don't want scandal, and to avoid -- you
6 know, talk to them to possibly avoid that.

7 Q. So when he came to tell you that the matter
8 was moving along and -- were you satisfied that it had
9 been taken care of?

10 A. Yes, uh-huh.

11 Q. But did you assume that Mr. Dickett had
12 actually had a conversation with the family or
13 did you know -- did he tell you that he talked to them?

14 A. No, he never said that he had a conversation
15 with the family, and I don't know what
16 communication he had, if any, before my conversation
17 with Mr. Dickett or after.

18 Q. Do you know whether Mr. Manta was involved in
19 the communication -- communicating the incident
20 to the Archdiocese?

21 A. No, I have no direct knowledge of that.

22 Q. However, I think you told us earlier that
23 Mr. Manta had some connections with the Archdiocese --

24 A. Yes, he did.

25 Q. -- his family did?

George Kachavos - September 12, 2007
Examination by Mr. James W. Grau

1 At that point is when I told him that, "It
2 sounds like sexual assault to me", and that, "He can't
3 stay here."

4 Q. When you told Gust Dickett that it sounds like
5 a sexual assault to you, what response did Gust Dickett
6 give to you?

7 A. Well, I can't recall the exact sequence of the
8 conversation that we had. But the highlight was the
9 fact that Gust Dickett confirmed an assault had taken
10 place, number one. There was no question about it in
11 my mind. There was no question that it was a sexual
12 assault, especially after knowing the conduct of Father
13 Katinas.

14 The third thing is that it appeared to me
15 that the were upset that Father Katinas had not
16 been reassigned over this period of time and that they
17 were threatening to go to the State's Attorney's
18 Office.

19 And what I said to Dickett was that, "We
20 can't let them do that. And besides, the fact that
21 we've got to get Katinas reassigned."

22 He didn't disagree with any of that.

23 Q. All right, let me stop you then.

24 MR. GRAU: I have to object as non-responsive.

25 Q. (By Mr. Grau) The question though, simply is:

George Kachavos - September 12, 2007
Examination by Mr. James W. Grau

1 A. Yeah.

2 Q. -- maybe I -- if I misunderstood.

3 Was an outside lawyer hired by the Church
4 of the Assumption to assist in the reassignment of
5 Father Katinas?

6 A. Not to my knowledge.

7 Q. Was an attorney -- was Gust Dickett an
8 attorney that you believed who was inside the church
9 handling the reassignment?

10 A. Yes, Sir.

11 (Phone ringing.)

12 A. I should keep this here, huh?

13 Q. Okay. I gave a little break there for the
14 phone to stop ringing, and let me continue on.

15 The concern of not going public with what
16 you thought had happened at the church with Father
17 Katinas and TS was, as I understand it,
18 because of the scandal that would arise as a result;
19 correct?

20 A. Partly.

21 Q. It would be an embarrassment for the
22 Katinas --

23 A. Yes.

24 Q. -- family, the family, for the church;
25 true?

George Kachavos - September 12, 2007
Examination by Mr. James W. Grau

1 A. Yes.

2 Q. And as a consequence of that, at least for
3 yourself, you kept quiet about it?

4 A. Yes.

5 Q. Would it be fair to say that with inside the
6 church, that -- during the time period from --

7 *(Phone ringing.)*

8 Q. -- when you first heard about it until the
9 time of the reassignment, that it was relatively quiet
10 within the church?

11 MS. MERRITT: Objection, form.

12 A. Can I take a break --

13 Q. (By Mr. Grau) Absolutely.

14 MR. GRAU: Let's go off the record.

15 THE VIDEOGRAPHER: We are off the video record
16 at 11:38.

17 *(Brief Recess from 11:38 a.m.*
18 *to 11:39 a.m.)*

19 THE VIDEOGRAPHER: We are back on the video
20 record at 11:39.

21 Q. (By Mr. Grau) We are back on the record. We
22 took just a brief break. Are you ready to proceed?

23 A. Yeah.

24 Q. Okay.

25 With respect to the -- I think the last

Oral and Videotaped Deposition - George Kachavos
September 12, 2007

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CAUSE NO. 0703807D

JOHN DOE I, JOHN DOE II,) IN THE DISTRICT COURT
THROUGH HIS MOTHER AS)
NEXT FRIEND OF JOHN DOE)
II, A VULNERABLE (NON)
COMPOS MENTIS) ADULT AND)
JOHN DO III,)

Plaintiffs,

v.) DALLAS COUNTY, TEXAS

REVEREND NICHOLAS E.)
KATINAS, PASTOR (FORMERLY))
OF HOLY TRINITY GREEK)
ORTHODOX CHURCH; HOLY)
TRINITY GREEK ORTHODOX)
CHURCH; THE GREEK ORTHODOX)
METROPOLIS OF DENVER BY)
AND THROUGH BISHOP ISAIAH)
OF DENVER IN HIS OFFICIAL)
CAPACITY, AND THE GREEK)
ORTHODOX ARCHDIOCESE OF)
AMERICA BY AND THROUGH)
ARCHBISHOP DEMETRIOS IN)
HIS OFFICIAL CAPACITY,)

Defendants.) 95TH JUDICIAL DISTRICT

REPORTER'S CERTIFICATE

ORAL AND VIDEOTAPED DEPOSITION OF GEORGE KACHAVOS

September 12, 2007

Oral and Videotaped Deposition - George Kachavos
September 12, 2007

1 I, Marion Ward, Certified Shorthand Reporter
2 in and for the State of Texas, hereby certify to the
3 following:

4 That the witness, GEORGE KACHAVOS, was duly
5 sworn and that the transcript of the deposition is a
6 true record of the testimony given by the witness;

7 That the deposition transcript was duly
8 submitted on 9/21/07 to the witness or the
9 attorney for the witness for examination, signature,
10 and return to me by 10/11/07.

11 That pursuant to information given to the
12 deposition officer at the time said testimony was
13 taken, the following includes all parties of record and
14 the amount of time used by each party at the time of
15 the deposition:

16 Ms. Tahira Khan Merritt (01h15m)
17 Attorney for Plaintiffs
18 Mr. James W. Grau (01h07m)
19 Attorney for Defendant GOAA
20 Mr. Richard G. Miller (00h28m)
Attorney for Defendant Holy Trinity and
Metropolis of Denver

21 FOR PLAINTIFFS:

22 Ms. Tahira Khan Merritt
23 TAHIRA KHAN MERRITT PLLC
24 8499 Greenville Avenue
Suite 206
25 Dallas, Texas 75231
(214)503-7300

Oral and Videotaped Deposition - George Kachavos
September 12, 2007

1 FOR DEFENDANT GOAA:

2 Mr. James W. Grau
3 GRAU KOEN, P.C.
4 2711 N. Haskell Avenue
5 Suite 2000
6 Dallas, Texas 75204
7 (214) 521-4145

8 FOR DEFENDANT HOLY TRINITY AND METROPOLIS OF DENVER:

9 Mr. Richard G. Miller
10 FLETCHER & SPRINGER, L.L.P.
11 8750 N. Central Expressway
12 16th Floor
13 Dallas, Texas 75231
14 (214) 987-9600
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Oral and Videotaped Deposition - George Kachavos
September 12, 2007

1 That a copy of this certificate was served
2 on all parties shown herein on 9/21/07
3 and filed with the Clerk.

4 I further certify that I am neither counsel
5 for; related to, nor employed by any of the parties in
6 the action in which this proceeding was taken, and
7 further that I am not financially or otherwise
8 interested in the outcome of this action.

9 Further certification requirements pursuant
10 to Rule 203 of the Texas Code of Civil Procedure will
11 be complied with after they have occurred.

12 Certified to by me on this 21st day of

13 September, 2007.

14
15
16 

17 Marion Ward, CSR
18 Texas CSR 876, Firm No. 126
19 Expiration: 12/31/08
20 MWA Reporters
21 6440 North Central Expressway
22 Suite 318
23 Dallas, Texas 75206
24
25

Oral and Videotaped Deposition - George Kachavos
September 12, 2007

FURTHER CERTIFICATION UNDER TRCP RULE 203

1
2
3 The original deposition ~~was~~ not returned
4 to the deposition officer on 11/2/07.

5 If returned, the attached Changes and
6 Signature page(s) contain(s) any changes and the
7 reasons therefor.

8 If returned, the original deposition was
9 delivered to Ms. Tahira Khan Merritt, Custodial
10 Attorney.

11 \$ 894.25 is the deposition officer's charges
12 to the Plaintiffs for preparing the original deposition
13 transcript and any copies of exhibits.

14 The deposition was delivered in accordance
15 with Rule 203.3, and a copy of this certificate, served
16 on all parties shown herein, was filed with the Clerk.

17 Certified to by me on this 21st day of

18 November, 2007.

19
20
21 M Ward

22 Marion Ward, CSR
23 Texas CSR 876, Firm No. 126
24 Expiration: 12/31/08
25 MWA Reporters
6440 North Central Expressway
Suite 318
Dallas, Texas 75206