

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN FRANCISCO  
UNLIMITED JURISDICTION

---oOo---

JOHN DOE, an incompetent  
person by and through his  
Guardian Ad Litem, WILLIAM  
B. HIRSCH,

Plaintiff,

vs.

No. CGC-06-452168

THE GREEK ORTHODOX  
METROPOLIS OF SAN FRANCISCO,  
a nonprofit corporation, FR.  
MICHAEL RYMER and ROES 1-10,  
inclusive,

Defendants.

---oOo---

DEPOSITION OF  
METROPOLITAN GERASIMOS  
VOLUME 1

Thursday, November 1, 2007

REPORTED BY: JOHN P. SQUIRES, CMR, CRP  
CSR No. 2001

Page 98

1 'rape', close quote. Do you see that?  
 2 A. Yes.  
 3 MS. HARTLEY: Object to the extent it calls  
 4 for speculation on the part of the witness.  
 5 MR. GROSS: Q. You understand that in this  
 6 letter Father Schroeder concludes that, as he says in  
 7 point 3, "Their relationship was therefore one of  
 8 victimization and not a consensual sexual  
 9 relationship"? Is that how you understand this  
 10 letter?  
 11 MS. HARTLEY: Lacks foundation, calls for  
 12 speculation on the part of the witness, and  
 13 misinterprets what the letter says. The question is  
 14 also vague and ambiguous.  
 15 THE WITNESS: That is his response. That's  
 16 his opinion.  
 17 MR. GROSS: Q. So your opinion in reading  
 18 the letter is that Father Schroeder concluded the  
 19 relationship was one of victimization and not a  
 20 consensual sexual relationship; is that correct?  
 21 MS. HARTLEY: Same objection.  
 22 THE WITNESS: No, that is not my conclusion.  
 23 Because Father Schroeder wrote it, that doesn't mean  
 24 that I am adopting it.  
 25 MR. GROSS: Q. I understand.

Page 99

1 But your understanding of the letter was  
 2 that Father Schroeder concluded that the relationship  
 3 between Father Rymer and [REDACTED] was one of  
 4 victimization and not a consensual sexual  
 5 relationship; is that correct?  
 6 A. No.  
 7 MS. HARTLEY: Lacks foundation, calls for  
 8 speculation on the part of the witness and  
 9 misinterprets the document.  
 10 THE WITNESS: It's not correct because, as I  
 11 told you, the letter was read by me some time ago and  
 12 I did not base my decisions or my discussion with  
 13 Father Paul on this particular letter. I don't  
 14 recall doing that.  
 15 MR. GROSS: Q. I'm asking you now as you  
 16 read the letter.  
 17 A. Okay.  
 18 Q. As you read the letter, do you understand  
 19 from reading the letter that Father Schroeder was  
 20 concluding that the relationship -- as is said in  
 21 point 3, that the relationship between Father Rymer  
 22 and [REDACTED] was one of victimization and not a  
 23 consensual sexual relationship?  
 24 MS. HARTLEY: The question is vague,  
 25 ambiguous, lacks foundation, calls for speculation on

Page 100

1 the part of the witness. It is misrepresenting the  
 2 document.  
 3 You can answer the question.  
 4 THE WITNESS: That represents Father Paul  
 5 Schroeder's personal opinion.  
 6 MR. GROSS: Q. So your understanding is  
 7 that that is what Father Schroeder --  
 8 A. That's what he said.  
 9 MS. HARTLEY: Same objections.  
 10 MR. GROSS: Q. Let me finish the question.  
 11 A. Sorry.  
 12 Q. So your understanding from reading the  
 13 letter is that Father Schroeder's personal opinion  
 14 was that the relationship between Father Rymer and  
 15 [REDACTED] was one of victimization and not a  
 16 consensual sexual relationship; is that correct?  
 17 MS. HARTLEY: Same objections.  
 18 THE WITNESS: Yes.  
 19 MS. HARTLEY: We're going to need to quit  
 20 for the day.  
 21 MR. GROSS: Hold on one moment.  
 22 (Off the record)  
 23 MR. GROSS: May I have a few more minutes?  
 24 I mean if you have to go, you have to go.  
 25 MS. HARTLEY: Do you have a few minutes if

Page 101

1 you call Father Earl now?  
 2 THE WITNESS: Yeah, we can have a few more  
 3 minutes, until he comes in.  
 4 (Off the record)  
 5 MR. GROSS: Q. I show you what has been  
 6 previously marked as Exhibit 13. It's a letter on  
 7 the letterhead of the Monastery of St. John of San  
 8 Francisco to Archbishop Demetrios of the Greek  
 9 Orthodox Archdiocese in New York.  
 10 Have you seen this letter before?  
 11 A. No.  
 12 Q. Can you read it for a moment.  
 13 A. Okay.  
 14 Q. Now, you understand that the Monastery of  
 15 St. John San Francisco is where Father Rymer is  
 16 residing now?  
 17 A. Yes.  
 18 Q. Now, Father Rymer was defrocked by the Greek  
 19 Orthodox Church; isn't that correct?  
 20 A. Yes.  
 21 Q. And in this letter the Monastery of St. John  
 22 of San Francisco is requesting the Archdiocese of the  
 23 Greek Orthodox Church to assist so that -- and I read  
 24 from the next to last paragraph -- so that Father  
 25 Rymer, quote, might retain priestly faculties to

26 (Pages 98 to 101)