

IN THE SUPREME COURT OF MISSOURI

STATE EX REL.)
DAVID CLOHESSY, in his capacity)
as director of the Survivors Network)
of Those Abused by Priests,)
) Case No. SC92716
Relator,)
) (Western District Court of Appeals
v.) Case No. WD75382
)
THE HONORABLE ANN J. MESLE,) (Circuit Court of Jackson County
) Case No. 1016-CV-29995
Respondent.)

MOTION FOR LEAVE FOR RELATOR
TO FILE SUPPLEMENTAL SUGGESTIONS

Comes now Appellant David Clohessy in his capacity as Director of the Survivors Network of Those Abused by Priests, by and through his undersigned counsel, and hereby moves this Court for leave to file *Relator's Supplemental Suggestions in Support of his Petition for Writ of Prohibition* (attached hereto).

Late in the afternoon on July 20, 2012, Respondent granted one of the Defendant's in this action, the Diocese of Kansas City-St. Joseph, motion to dismiss all of the claims in Plaintiff's Third Amended Petition (the "Petition"). Therefore, the Diocese is no longer a party to this action. In turn, as discussed in more detailed in the attached supplemental suggestions, Relator believes this dismissal further supports his position regarding the forced production of SNAP's records in this matter.

WHEREFORE, the Relator respectfully requests that this Court issue an order granting him leave to file the attached *Relator's Supplemental Suggestions in Support of his Petition for Writ of Prohibition*.

Respectfully submitted,

/s/ Bryan C. Bacon

Bryan C. Bacon, MO Bar No. 46229

Van Matre, Harrison, Hollis, Taylor and Bacon P.C.

1103 E Broadway

Columbia, MO 65201

Telephone: (573) 874-7777

Telecopier: (573) 875-0017

bryan@vanmatre.com

Brendan J. Donelon, MO Bar No. 43901

Donelon, P.C.

802 Broadway, 7th Floor

Kansas City, MO 64105

Telephone: (816) 221-7100

Telecopier: (816) 472-6805

Brendan@donelonpc.com

ATTORNEYS FOR RELATOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was sent via U.S. Mail, postage prepaid, on July 23, 2012, to:

Brian J. Madden
Diane K. Watkins
Adam S. Davis
WAGSTAFF & CARTMELL LLP
4740 Grand Ave., Ste. 300
Kansas City, MO 64112
bmadden@wcllp.com
d Watkins@wcllp.com
adavis@wcllp.com
Attorneys for Defendant Father Michael Tierney

Rebecca M. Randles
Dan Curry
Randles, Mata & Brown, LLC
406 West 34th Street, Ste. 623
Kansas City, MO 64111
Rebecca@rmblawyers.com
dan@rmblawyers.com
Attorney for Plaintiff

Jonathan R. Haden
Mara Cohara
Lathrop & Gage, L.C.
2345 Grand Blvd., Ste. 2200
Kansas City, Missouri 64108
jrhaden@lathropgage.com
mcohara@lathropgage.com
Attorneys for Catholic Diocese of Kansas City-St. Joseph

The Honorable Ann J. Mesle
Jackson County Courthouse
415 E. 12th Street
Kansas City, MO 64016

/s/ Bryan C. Bacon
Bryan C. Bacon