

HEARING PANEL OF THE DISCIPLINARY BOARD OF THE EPISCOPAL CHURCH IN CONNECTICUT

THE EPISCOPAL CHURCH IN CONNECTICUT V	}	
	}. Respondent's Supplemental Response to the Church Attorney's Motion to Remove from the List of	
THE REVEREND AMJAD SAMUEL	}. Complainants in this Matter	
	}. [REDACTED]	
RESPONDENT	}. in the Discovery Plan and	
	}. Scheduling Order	

ECCT Title IV Matter 2021-1

The Respondent, The Reverend Amjad J. Samuel, through his counsel, provides this supplemental response to the Motion filed on behalf of The Episcopal Church in Connecticut ("ECCT"), through their counsel requesting that the Hearing Panel remove from the list of Complainants in this matter [REDACTED] in the Discovery Plan and Scheduling Order jointly submitted to the Panel and subsequently issued by the Reverend Joseph Shepley, President of the Hearing Panel.

In the papers filed by the Church Attorney, he erroneously states, "Finally, the Statement of Offenses does not contain any charges specifically relating to [REDACTED]." In fact, the Statement of [alleged] Offenses states, *inter alia*, "Since Reverend Amjad Samuel's arrival at St. Paul's Episcopal Church in Shelton, Connecticut... in late 2014... the [REDACTED] [REDACTED] left [REDACTED] employment at St. Paul's. ... the [REDACTED] left St. Paul's because of the hostile and intimidating environment created and fostered by Rev. Samuel."

Based upon the foregoing, Respondent, The Reverend Amjad J. Samuel respectfully requests that this motion be denied in its entirety. However, if Reverend Shepley, in his capacity as the President of the Hearing Panel is inclined to grant the Motion filed by the Church Attorney, Respondent respectfully accepts the Church Attorney's stipulation that Respondent be allowed to take the two depositions and propound the up to twenty written Interrogatories as though [REDACTED] were still a Complainant. Additionally, Respondent respectfully again requests that if this motion is granted, that should [REDACTED] fail or refuse to

cooperate fully regarding [REDACTED] deposition, interrogatories or testifying at the Hearing, that any and all charges relating to [REDACTED] be dismissed with Prejudice.

Faithfully,

/s/ Michael F. Rehill

Michael F. Rehill J.D., D.D.

Counsel for Respondent

cc: Donald Allison, Church Attorney
The Rev. Amjad J. Samuel, Respondent
Dr. Pamela L. Lutz, LL. D., Advisor to Respondent