



Oct 24 2008
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**DISTRICT COURT, COUNTY OF EL PASO,
COLORADO**

**Court Address: Clerk of the Combined Court
El Paso County District Court
270 South Tejon Street
Colorado Springs, CO 80903**

**Plaintiff: GRACE CHURCH AND SAINT STEPHEN'S,
a Colorado Nonprofit Corporation,**

v.

**Defendant and Counterclaimant: THE BISHOP AND
DIOCESE OF COLORADO, a Colorado Nonprofit
Corporation.**

And

**Third Party Plaintiffs: THE DIOCESE OF COLORADO
IN THE EPISCOPAL CHURCH, et al**

v.

**Third Party Defendant: GRACE CHURCH AND ST.
STEPHEN'S.**

Attorney for Plaintiff

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Case #07CV1971

DIV. COM5

**PLAINTIFF GRACE CHURCH & ST. STEPHEN'S SECOND SUPPLEMENTAL
EXPERT DISCLOSURES PURSUANT TO CR.C.P. 26 (a)(2)(B)(I) and (a)(2)(B)(II)**

PLAINTIFF GRACE CHURCH & ST. STEPHENS submits the following disclosure of expert testimony pursuant to C.R.C.P. 26:

II. DISCLOSURE OF EXPERT TESTIMONY

Plaintiffs have not determined all experts who may be used in this case, but pursuant to Rule 26(a)(2)(B)(I) and (a)(2)(B)(II), the Plaintiff discloses the following areas of expert testimony:

1. **Mary A. McReynolds, Esq., 1050 Connecticut Avenue, N.W., Tenth Floor, Washington, D.C., 20036; (202) 429-1770.** Ms. McReynolds is an attorney with experience as general counsel for non-profit and for-profit religious, arts, educational and business corporations and associations. Ms. McReynolds served as chancellor to and/or represented a number of PECUSA and Anglican parishes, priests and affiliated organizations and entities throughout the United States and Bishops of Provinces of the Anglican Communion other than PECUSA in connection with various civil and canon law matters. Ms. McReynolds will testify consistent with the opinions expressed in her Affidavits and attached supporting exhibits attached to Plaintiff's Brief in Opposition to Defendant/Third Party Plaintiff's Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgment filed September 11, 2007 and which are incorporated by reference. Ms. McReynolds' hourly expert witness fee is \$200.00. A copy of Ms. McReynolds' curriculum vitae and a listing of publications has been provided. Attached is a Memorandum containing the names of cases in which Ms. McReynolds has provided expert testimony.
2. **Jon Wroblewski, Senior Warden, Grace Church & St. Stephen's, 601 N. Tejon Street, Colorado Springs, CO 80903; (719) 633- 5529.** Mr. Wroblewski has been the Senior Warden of Grace Church & St. Stephen's since January 28, 2007, Junior Warden since January, 2004 and has served on the Vestry since January 29, 2001. Mr. Wroblewski will testify consistent with the opinions set forth in his Affidavit of September 4, 2007 which was attached to Plaintiff's Brief in Opposition to Defendant/Third Party Plaintiff's Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgment filed September 11, 2007 and which are incorporated by reference. Attached hereto is a copy of Mr. Wroblewski's Resume'.

J. GREGORY WALTA, P.C.

/s/ J. Gregory Walta

J. Gregory Walta, #1867
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served via Justice Link/Courtlink or by U.S. Mail this 24th day of October 2008, addressed to the following:

Martin Nussbaum
Rothgerber Johnson & Lyons LLP
90 South Cascade Avenue
Colorado Springs, CO 80903

/s/ Jane M. Thomsen

LAW OFFICES
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MEMORANDUM

For: Grace Church & St. Stephen's
From: Mary McReynolds
Re: Expert Witness
Date: October 20, 2008

Set forth below are the names of the cases as to which I have provided expert counsel and/or testimony. The cases marked with an asterisk are those in which I have provided expert testimony in the form of affidavits. My role has varied from case to case. Also please note that many of the cases below have been consolidated or represent both the trial and appellate court proceedings. Please let me know whether you need for me to group the cases and describe with greater particularity the expert services provided with respect to each case or group of cases. This list does not include internal church clergy disciplinary proceedings requiring expertise in canon law. Nor does the list include work drafting ecclesiastical structures, constitutions and canons.

1. *In re: Truro Church*, CL 2006-15792 (Circuit Court for Fairfax County, Va.);
2. *In re: Church of the Apostles*, CL 2006-15793 (Circuit Court for Fairfax County, Va.);
3. *In re: Church of the Word, Gainesville*, CL 2007-11514 (Circuit Court for Prince William County, Va.) (formerly No. CL73464, Circuit Court for Fairfax County, Va.);

4. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of the Epiphany, Herndon*, CL 2007-1235 (Circuit Court for Fairfax County, Va.);
5. *The Protestant Episcopal Church in the Diocese of Virginia v. Truro Church*, CL 2007-1236 (Circuit Court for Fairfax County, Va.);
6. *The Protestant Episcopal Church in the Diocese of Virginia v. Christ the Redeemer Church*, CL 2007-1237 (Circuit Court for Fairfax County, Va.);
7. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of the Apostles*, CL 2007-1238 (Circuit Court for Fairfax County, Va.);
8. *The Episcopal Church v. Truro Church, et al.*, CL 2007-1625 (Circuit Court for Fairfax County, Va.);
9. *In re: Church at the Falls, The Falls Church*, CL 2007-5249 (Circuit Court for Fairfax County, Va.);
10. *The Protestant Episcopal Church in the Diocese of Virginia v. The Church at The Falls – The Falls Church*, CL 2007-5250 (Circuit Court for Fairfax County, Va.) (formerly Case No. 07-125, Circuit Court for Arlington County, Va.);
11. *The Protestant Episcopal Church in the Dioceses of Virginia v. Potomac Falls Church*, CL 2007-5362 (Circuit Court for Fairfax County, Va.) (formerly Case No. 44149, Circuit Court for Loudoun County, Va.);
12. *In re: Church of Our Savior at Oatlands*, CL 2007-5363 (Circuit Court for Fairfax County, Va.);
13. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of Our Saviour at Oatlands*, CL 2007-5364 (Circuit Court for Fairfax County, Va.) (formerly Case No. 44148, Circuit Court for Loudoun County, Va.);
14. *In re: Church of the Epiphany*, CL 2007-556 (Circuit Court for Fairfax County, Va.);
15. *The Protestant Episcopal Church in the Diocese of Virginia v. St. Margaret's Church*, CL 2007-5682 (Circuit Court for Fairfax County, Va.) (formerly Case No. CL 73465, Circuit Court for Prince William Cnty., Va.);

16. *The Protestant Episcopal Church in the Diocese of Virginia v. St. Paul's Church, Haymarket*, Case No. CL 73466 (Circuit Court for Fairfax County, Va.) (formerly CL 2007-5683, Prince William County, Va.);
17. *The Protestant Episcopal Church in the Diocese of Virginia v. Church of the Word*, CL 2007-5684 (Circuit Court for Fairfax County, Va.) (formerly Case No. CL 73464, Circuit Court for Prince William County, Va.);
18. *In re: St. Margaret's Church*, CL 2007-5685 (Circuit Court for Fairfax County, Va.);
19. *In re: St. Paul's Church, Haymarket*, CL 2007-5686 (Circuit Court for Fairfax County, Va.);
20. *The Protestant Episcopal Church in the Diocese of Virginia v. St. Stephen's Church*, CL 2007-5902 (Circuit Court for Fairfax County, Va.) (formerly Case No. CL 07-16, Circuit Court for Northumberland County, Va.);
21. *In re: St. Stephen's Church*, CL 2007-5903 (Circuit Court for Fairfax County, Va.);
- *22. *The Episcopal Diocese of Rochester, et al. v. The Rev. David Harnish, et al.*, Index No. 2006-2669 (N.Y. Sup. Ct. for Monroe Cnty.);
- *23. *All Saints' Anglican Church v. Episcopal Diocese of Rochester, et al.*, Index No. 2006-003235 (N.Y. Sup. Ct. for Monroe Cnty.);
24. *The Episcopal Diocese of Rochester & The Rt. Rev. Jack M. McKelvey, Seventh Bishop of the Diocese of Rochester v. The Rev. David Harnish, former Rector, All Saints Protestant Episcopal Church; Horace (Bud) Roberts and Frances Miller, former Wardens of All Saints Protestant Episcopal Church; Al Bagdonas, Nancy Fox, Sue Hemphill, Tim Kearney, Hilda McLeod, Jason O'Neil, & Gerald Quenell, former Vestrymen of All Saints Protestant Episcopal Church; & All Saints Protestant Episcopal Church, Inc.*, Docket No. CA 06-03056 (N.Y. Ct. of Appeals);
25. *All Saints Anglican Church, formerly known as All Saints Protestant Episcopal Church v. Episcopal Diocese of Rochester & The Rt. Rev. Jack M. McKelvey in his capacity as the Bishop of the Diocese of Rochester*, Docket No. CA 06-03055 (N.Y. Ct. of Appeals);

- *26. *The Episcopal Church in the Diocese of Florida, Inc. v. Leihar, et al.*, Case No. 16-2006-CA-002361 (Duval Cnty. Fla. Cir Ct., 4th Cir., Div. CV-H);
- *27. *Grace Church & St. Stephen's v. The Bishop and Diocese of Colorado, et al.*, Case No. 2007-CV-1971 (Div. Com. 5)(El Paso Cnty. Colo. Dist. Ct.).

RESUME

Experience Summary

26 years of experience spanning: integrated architecture development according to the DoD Architecture Framework and Joint Capabilities Integration and Development System; Service Oriented Architectures (SOA) specification; interoperability analysis/engineering; integration engineering; project planning/management; requirements/capabilities definition/analysis; expert in process modeling, process capture, process management; information architectures; and technical management of system/software development efforts. Government Security Clearance – Top Secret/Sensitive Compartmented Information (SAP/SAR). 22 years proposal writing/mgt experience.

Job Descriptions

Jun 2008 – Present. Consultant to Schafer Corp. Mr. Wroblewski supports the Space Control Program for AFSPC. He leads the software development effort for the Space Control Program Support System (SPSS) that provides the command with the Space Control Integrated Master Schedule, the Tasker Tracker database, the Electronic Document Library, and other productivity enhancement tools. The SPSS is the foundation for supporting the Space Control mission across all AFSPC directorates. He also serves on the Long Range Planning team, developing concepts, Space Control Enterprise Architectures/Assessments, and participating in the Integrated Planning Process for the command.

Nov 2006 – Jun 2008. Consultant to Lockheed Martin (LM) - Mr. Wroblewski provided consultation to LM on the Air Force Space Fence Project, bringing insights on Space Situational Awareness (SSA) to that effort. He was the principle author for a team of technical experts that produced a white paper framing the SSA gaps and shortfalls, focusing on how an S-Band radar could provide substantial improvements to the national space radar capability. The study provided the government a roadmap to achieve these improvements in a complex funding environment.

Nov 2004 – Nov 2006. Consultant to SPARTA, Booz-Allen-Hamilton Corporation - Mr. Wroblewski functioned as Chief Architect for the Space Situation Awareness Integration Office (SSAIO). He supervised the development of an information architecture that depicts satellite and related ground support assets across all military services, civilian and military agencies, and commercial/foreign entities. Mr. Wroblewski ensured that:

- the relevant requirements were collected and expressed in terms of effects-based capabilities,
- an operational architecture was built,
- a related system architecture was constructed,
- assessments were made of the current (As-Is) and future (To-Be) versions of the Space Situation Awareness Architecture is accomplished, and
- all Enterprise Architecture products were delivered according to schedule.

From these activities, a 20-year national modernization and investment strategy (~\$50B) for targeted budget years was developed and integrated into the national space plans for the Executive Agent, Space (Under Secretary, Air Force), whom he briefed on results of the assessment. For the 2005 version of this document, he was the principal author/editor of the summary document encapsulating the work done by his staff. Mr. Wroblewski also made inputs to the National Security Space Plan on behalf of the SSAIO, and served as primary liaison to the national and

joint communities.

1999 – 2004. Consultant to SY-Coleman, (Subsidiary of L3 Comm) - Mr. Wroblewski served as Task Leader for the Army Space Command Space Surveillance Task Order. In this capacity he ensured all contractual requirements were met and cost/schedule requirements were achieved. While supporting Army Space Command, he acted as liaison between the Reagan Test Site (Kwajalien Atoll) and the space community. He successfully guided the Kwajalien communication and circuit upgrade through the Operations Approval Board change management process. On this effort he designed a program plan and roadmap for integration of various Army space control missions into a single, integrated approach and was principle author of the Army Space Command Space Control Strategy. He also served on the working group that developed the concept of the SSA Integration Office for the government.

1984 – 1999. CACI (formerly SofTech), Senior Analyst, Project Manager, Director – Mr. Wroblewski worked as Senior Analyst for the Systems Engineering, Integration and Test Configuration Management (CM) Integrated Process Team effort for the Integrated Tactical Warning and Attack Assessment System Program Office at Peterson AFB, CO. Tasks include process/data modeling, high-level database design, strategic/near term planning for transition to new systems and processes, and system architecture definition.

Working as a consultant to Robbins-Gioia and Coopers & Lybrand (U.K.), Mr. Wroblewski provided advice on a \$150M information system development program for the United Kingdom's Ministry of Defence Program, CAPITAL. In this capacity, he developed a CM Plan, a Program Risk Management Plan (implemented on Lotus Notes intranet shareware), and developed a database management system application for document control and hardware/software configuration management. He also provided on-going consultation in the areas of cost management/control, scheduling, and transition from a development to an operational system.

As Project Manager on the Mobile Command & Control System Program, he successfully guided the efforts of 12 software engineers from Preliminary Design Review through Formal Qualification Testing and delivery to the government. This work involved design, implementation, and testing of AFSPC message sets and displays for Cheyenne Mt. Battlestaff command and control operators.

Mr. Wroblewski functioned as Project Manager for work being done in support of the Air Force logistics community. An Open Systems Interconnection (OSI) commercially available software package (Retix) was rehosted to an Ada environment to enhance its portability. A hybrid (Ada/C) communication protocol was developed through the complete DoD-STD-2167A lifecycle. Mr. Wroblewski was the principal author of a Cost/Risk/Benefit analysis that evaluated alternative approaches to migrating the Cheyenne Mountain Complex and various command and control systems to an OSI environment.

He served as Project Manager on a commercial project implementing custom software support tools for a digital signal processor being co-developed by Array Microsystems (Colorado Springs) and Samsung Electronics (Korea). He planned and supervised the software development work that implements both a user interface to the programmable high-performance chip and an emulator/timing simulator that models video image compression applications for the consumer electronics industry.

In other careers, Mr. Wroblewski served as a Forward Air Controller in Southeast Asia (102 missions); an instructor pilot at the U.S. Air Force Academy; an associate professor at the Univ. of Connecticut (research); programmer/analyst for a commercial software firm; and a flight engineer for Braniff Airways (commercial air carrier).

Jon Wroblewski
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Education

Univ of Colorado/Colorado Springs, MBA, Information Systems, 1991
U.S. Air Force Academy, BS, Russian Studies, 1971

Additional Training

Undergraduate Pilot Training, USAF, AF Air/Ground Operations School, Special Operations Training, AF Academic Instructor Course, Defense Sys Mgt College Program Mgt Course, DoDAF Architecture Framework Implementation (Structured Analysis), Advances in DoDAF Architectures (Object-Oriented), Rational Trng, Basic UML, Business Process Engineering