Exhibit A



COURT REPORTING

LEGAL VIDEOGRAPHY

VIDEOCONFERENCING

TRIAL PRESENTATION

MOCK JURY SERVICES

LEGAL TRANSCRIPTION

COPYING AND SCANNING

LANGUAGE INTERPRETERS



TRACY CAEKAERT, and CAMMILLIA MAPLEY, Plaintiffs,

v. Cause No. CV-20-52-BLG-SPW

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, and BRUCE MAPLEY SR., Defendants.

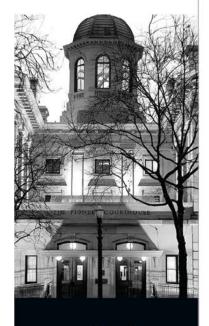
WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.
Cross-Claimant,
v.
BRUCE MAPLEY SR.,

ROUGH DRAFT VIDEOTAPED REMOTE DEPOSITION CAMILLIA MAPLEY

Cross-Claim Defendant.

TAKEN ON WEDNESDAY, NOVEMBER 30, 2022 (TUESDAY, NOVEMBER 29, 2022)
5:12 A.M. AEDT (11:12 A.M. MST)

WORKSPACE - LEVEL 5 171 COLLINS STREET MELBOURNE, 3000 AU







(800) 528-3335 NAEGELIUSA.COM



Q. Can you tell me why? 1 2 Α. No, I don't know. 3 Q. And you don't --That's for -- I'm not the legal team. 4 Α. Why did you sue Bruce Senior in the first 5 Q. 6 place? 7 MR. SHAFFER: Object to form. Cami hired 8 lawyers to take wha thappened to her, what she recited happened to her and put that inbto legal 10 papers and filed them on her behalf, so if you're asking her for the strategic reasoning behind her 11 12 lawyers' decisions, I think that's an improper 13 question. 14 MR. SWEENEY: I think your comments are 15 improper, Ryan. My question is direct. She sued 16 Bruce Mapley Senior. I'm asking her why. 17 MR. SHAFFER: Same objection. BY MR. SWEENEY: 18 19 You can answer, Cami. Q. 20 Α. Because he sexually abused me. 21 Then why have you now dismissed your Q. 22 claims against Bruce Senior? 23 MR. SHAFFER: Same objection. 24 BY MR. SWEENEY: 25 And my answer is, is that's the lawyers' Α.



1 decision. Did you reach a settlement with Bruce 2 Q. 3 Senior? Α. I have no contact with the man. 4 5 I appreciate that, but do you know if you 6 have entered into a settlement agreement with Bruce 7 SEnior? If I hav no contact, I have no contact. 8 Α. How can I settle an agreeennt with him? 10 Q. Do you know if you have released him from 11 being liable for the allegations in your complaint? 12 I have no idea. Α. 13 And I think you're testifying that you don't know if you entered into a written settlement 15 agreement with Bruce Senior, is that accurate? MR. SHAFFER: Object to form. She said --16 17 BY MR. SWEENEY: I never said I --18 Α. 19 All right. Q. I never said I didn't know. 20 Α. 21 MR. SHAFFER: Misstates her testimony. 22 BY MR. SWEENEY: 23 I'll ask you then, have you entered into a Q. written settlement agreement with Bruce Senior? 24 25 Α. No.

If the answer is she doesn't know, she can

dismissed Bruce. I'm going to ask her why.

tell me that, but I don't think she gets to hide

behind attorney/client privilege for why she named

22

23

24

25

somebody as a defendant or why she dismissed them. 1 2 MR. SHAFFER: Her testimony has been 3 She left that to her lawyers to decide. lawyers decided it. You're asking her now to get 5 into what her lawyers told her as about why her lawyers dismissed Bruce Mapley, I believe that's 7 getting into attorney/client privilege communication. I'm not going to let her answer it. BY MR. SWEENEY: 10 Q. Cami, do you think Bruce Senior should still be a defendant in this lawsuit? 11 12 Well, his name's still on it, so isn't he? Α. 13 He has been dismissed by order of court, Q. 14 so inaccurately his name was represented as being in 15 the caption, but the claims have been dismissed, to clear that up for you. 16 17 Α. Well, I think the truth should come out, 18 and that's what our goal is here, isn't it? 19 And I appreciate that, but my question is: 20 Do you think Bruce Senior should still be a 21 defendant in this lawsuit? Don't know. 22 Α. 23 Q. How did you know Gunner Haines? 24 He was in the congregation. Α.

When did Gunner pass away?

25

Q.