

# *Exhibit A*



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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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.

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WATCHTOWER BIBLE AND TRACT SOCIETY  
OF NEW YORK, INC.

Cross-Claimant,

v.

BRUCE MAPLEY SR.,  
Cross-Claim Defendant.

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ROUGH DRAFT  
VIDEOTAPED REMOTE DEPOSITION  
CAMILLIA MAPLEY

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



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**Q.** You have recently dismissed your claims against Bruce Senior, do I have that right?

**MR. SHAFFER:** Object to form. Her lawyers did that. That's correct. That's what the record will reflect.

**BY MR. SWEENEY:**

**Q.** Cami, are you aware of that?

**A.** Yes.

1 Q. Can you tell me why?

2 A. No, I don't know.

3 Q. And you don't --

4 A. That's for -- I'm not the legal team.

5 Q. Why did you sue Bruce Senior in the first  
6 place?

7 MR. SHAFFER: Object to form. Cami hired  
8 lawyers to take wha thappened to her, what she  
9 recited happened to her and put that inbto legal  
10 papers and filed them on her behalf, so if you're  
11 asking her for the strategic reasoning behind her  
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.

18 BY MR. SWEENEY:

19 Q. You can answer, Cami.

20 A. Because he sexually abused me.

21 Q. Then why have you now dismissed your  
22 claims against Bruce Senior?

23 MR. SHAFFER: Same objection.

24 BY MR. SWEENEY:

25 A. And my answer is, is that's the lawyers'

1 decision.

2 Q. Did you reach a settlement with Bruce  
3 Senior?

4 A. I have no contact with the man.

5 Q. I appreciate that, but do you know if you  
6 have entered into a settlement agreement with Bruce  
7 Senior?

8 A. If I hav no contact, I have no contact.  
9 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 A. I have no idea.

13 Q. And I think you're testifying that you  
14 don't know if you entered into a written settlement  
15 agreement with Bruce Senior, is that accurate?

16 MR. SHAFFER: Object to form. She said --

17 BY MR. SWEENEY:

18 A. I never said I --

19 Q. All right.

20 A. I never said I didn't know.

21 MR. SHAFFER: Misstates her testimony.

22 BY MR. SWEENEY:

23 Q. I'll ask you then, have you entered into a  
24 written settlement agreement with Bruce Senior?

25 A. No.

1 Q. Is your testimony today that you have no  
2 idea why he has been dismissed from this lawsuit?

3 MR. SHAFFER: Asked and answered.

4 BY MR. SWEENEY:

5 A. Once again, that is for my lawyers to make  
6 decision about what's happening.

7 Q. And I appreciate that, Cami. I'm asking  
8 about your personal knowledge. Do you know why he  
9 was dismissed from this lawsuit?

10 MR. SHAFFER: Cami, don't answer that.  
11 You and I have talked about that. He's not allowed  
12 to ask you that question.

13 MR. SWEENEY: Well, Ryan, she doesn't get  
14 to insulate testimony simply by bringing it up with  
15 you. If she knows why a person she'd sue has been  
16 dismissed, she has to tell me that.

17 MR. SHAFFER: If she knows why her lawyers  
18 dismissed Bruce Mapley, she has to tell you that? I  
19 disagree. Cami, don't answer the question.

20 MR. SWEENEY: Well, Ryan, this is not your  
21 lawsuit. This is hers. She sued Bruce. She  
22 dismissed Bruce. I'm going to ask her why.

23 If the answer is she doesn't know, she can  
24 tell me that, but I don't think she gets to hide  
25 behind attorney/client privilege for why she named

1 somebody as a defendant or why she dismissed them.

2 **MR. SHAFFER:** Her testimony has been  
3 clear. She left that to her lawyers to decide. Her  
4 lawyers decided it. You're asking her now to get  
5 into what her lawyers told her as about why her  
6 lawyers dismissed Bruce Mapley, I believe that's  
7 getting into attorney/client privilege  
8 communication. I'm not going to let her answer it.

9 **BY MR. SWEENEY:**

10 **Q. Cami, do you think Bruce Senior should**  
11 **still be a defendant in this lawsuit?**

12 **A. Well, his name's still on it, so isn't he?**

13 **Q. He has been dismissed by order of court,**  
14 **so inaccurately his name was represented as being in**  
15 **the caption, but the claims have been dismissed, to**  
16 **clear that up for you.**

17 **A. Well, I think the truth should come out,**  
18 **and that's what our goal is here, isn't it?**

19 **Q. And I appreciate that, but my question is:**  
20 **Do you think Bruce Senior should still be a**  
21 **defendant in this lawsuit?**

22 **A. Don't know.**

23 **Q. How did you know Gunner Haines?**

24 **A. He was in the congregation.**

25 **Q. When did Gunner pass away?**