

Exhibit A

Shirley Gibson

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

TRACY CAEKAERT, and
CAMILLIA MAPLEY,
Plaintiffs, Case No. CV-20-52-BLG-SPW

vs.

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,
BRUCE MAPLEY, SR.,
Cross Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE Cause No. CV 20-59-BLG-SPW
Plaintiff,

vs.

WATCHTOWER BIBLE AND TRACT

Shirley Gibson

1 SOCIETY OF NEW YORK, INC.
2 and WATCH TOWER BIBLE AND
3 TRACT SOCIETY OF
4 PENNSYLVANIA,
5 Defendants.

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VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION OF
SHIRLEY GIBSON

BE IT REMEMBERED, that the
videoconference/videotaped deposition upon oral
examination of Shirley Gibson, appearing at the
instance of the Plaintiffs, was taken at 800 North
Last Chance Gulch, Suite 101, Helena, Montana, on
Thursday, April 14, 2022, beginning at the hour of
9:07 a.m., pursuant to the Federal Rules of Civil
Procedure, before Mary R. Sullivan, Registered
Merit Reporter, Certified Realtime Reporter, and
Notary Public.

Shirley Gibson

1 A. (Nods head.)

2 Q. And then Helena.

3 A. Yes.

4 Q. Which -- Which Kingdom Hall is in Helena?

5 A. I'm in Canyon Ferry congregation.

6 Q. Okay. And have you been a member of
7 other congregations in Helena?

8 A. No.

9 Q. Just that one?

10 A. Just that one.

11 Q. Okay. And is that the full list of the
12 congregations where you've served as a member?

13 A. All the -- All those places that I've
14 been.

15 Q. Yeah.

16 A. In Helena, this is the only one, yeah.

17 Q. Okay. All right.

18 Let's talk about paragraph 3 of your
19 affidavit. The first sentence you state that
20 Bruce, Sr. was a pedophile who started molesting
21 Tracy when she was four. And then you say [As
22 Read]: "This came out in 1977 when we learned that
23 another Ministerial Servant in the Hardin
24 congregation, Gunner Hain, had sexually molested
25 Tracy at his home."

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Shirley Gibson

1 A. Yes.

2 Q. Why do you say 1977? You fairly -- How
3 do you feel about that number, that year? Pretty
4 certain about that?

5 A. Yes.

6 Q. Tell me why.

7 A. Because it was brought to my attention
8 all this stuff had happened, and I --

9 Q. How -- How was it brought your attention?

10 A. Well, because of Gunner Hain, it came
11 out. He was reprovved, but they didn't do anything
12 to Bruce 'cause he -- Anyway. I was told what had
13 happened, and then Bruce admitted he had too,
14 so -- but they didn't do anything with Bruce but
15 they did something -- they -- Gunner Hain was
16 reprovved is all.

17 Q. Who told you that?

18 A. Harold Rimby.

19 Q. And so when you say this came out in
20 1977, that -- that -- Harold Rimby told you
21 personally --

22 A. Yes.

23 Q. -- about Gunner Hain.

24 A. And my ex-husband.

25 Q. And your ex-husband molesting Gunner's

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1 stepdaughter. Gunner had molested his
2 stepdaughter and Tracy.

3 A. (Nods head.)

4 Q. How did Mr. Rimby know that?

5 MR. SWEENEY: Objection. Speculation.

6 A. Do I still answer?

7 BY MR. SHAFFER:

8 Q. Yeah, go ahead. Yeah.

9 A. Well, because Gunner told Harold.

10 Q. And then Harold told you.

11 A. Yes.

12 Q. Okay. Sounds like Harold told you about
13 Gunner. Did -- In -- In the same conversation he
14 told you that Bruce had done the same thing?

15 A. Yes.

16 Q. And do you know how Harold knew
17 that -- that Bruce had molested Tracy?

18 MR. SWEENEY: Objection. Speculation.

19 BY MR. SHAFFER:

20 Q. Go ahead. It's okay.

21 A. Well, Bruce admitted to Harold that he
22 had.

23 Q. Okay. And then Harold told you.

24 A. Yes.

25 Q. Okay. In 1977 -- Why do you say 1977 as

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1 opposed to 1978?

2 A. Because it was the year after we were
3 baptized.

4 Q. Okay. So you feel -- you're certain
5 about that number, 1977.

6 A. (Nods head.)

7 Q. Yeah. Where were you when you had this
8 conversation with Mr. Rimby?

9 A. In our home at Fort Smith.

10 Q. Who else was there?

11 A. My ex-husband.

12 Q. So just the three of you?

13 A. Yeah. Well, my children were there, too.

14 Q. Okay. And had Mr. Rimby announced he was
15 going to come over to have this conversation with
16 you or did he just show up, or how'd that happen?

17 A. I guess just showed up. I don't
18 remember. We didn't make announcements; we just
19 came --

20 Q. Okay.

21 A. -- to each other's homes.

22 Q. I take it it was a surprise. It was
23 shocking.

24 A. Yes.

25 Q. Is that fair?

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1 A. And the first thing I said was "We need
2 to call the authorities."

3 And Harold said, "I'll take care of it."

4 Q. Okay.

5 A. So I assumed he would, but he didn't.

6 Q. Okay.

7 A. I mean, maybe he did. He didn't call the
8 authorities, though. And that was my mistake.

9 Q. Was Harold an elder at that point?

10 A. Yes.

11 Q. And you're new to the church at that
12 point in time.

13 A. Yes.

14 Q. You understood that if Harold -- Harold
15 was essentially directing how to take care of this
16 situation. Is that right?

17 A. Yes.

18 Q. And would there be a consequence to you
19 as a member if you did -- if you disobeyed
20 Mr. Rimby's command to not tell the authorities?

21 A. No, there wouldn't have been a problem.
22 I just assumed he was going to do it. He said he
23 was.

24 Q. He said he was going to tell the
25 authorities or he was going to handle it?