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April 26, 2023

Via Email and U.S. Mail

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Re: *Caekaert & Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.*
Rowland & Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.

Counsel:

Thank you for the call today. I wanted to point out that while we primarily discussed the topic of JW's policies and procedures for handling sexual abuse from 1970 to today, our below email from April 19 identified additional general topics for the depositions of Shuster, Breaux, and Smalley. Moreover, as the Court recognized, our reply brief at pages 8-11 sets forth the reasons for these depositions "with sufficient specificity".

There was also a question of whether the several documents at Doc. 170-2 established Breaux was designated in the *Charissa W. and Nicole D. v. WTNY* case as the person most knowledgeable about (1) the JW's policy for handling child sex abuse from 1970 to the present and (2) the policy for warning congregations about known child molesters during the same time period. Since those documents weren't clear, I'm including two more from the public record of that case that establish Mr. Breaux was in fact designated as the person most knowledge about those topics.

Because you have asserted that Mr. Shuster and Mr. Breaux are apex witnesses, we asked you to be prepared to discuss how you determine who is and who is not an apex witness within the Jehovah's Witnesses Organization. You did not offer any information about this during our call. Additionally, we asked you to be prepared to provide a list of alternative witnesses who are

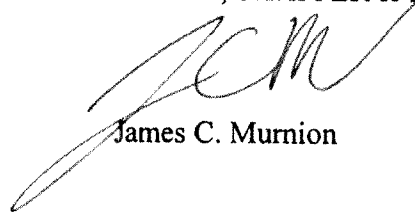
April 26, 2023

Page 2

not apex witnesses that would have similar personal history and knowledge as Mr. Shuster and Mr. Breaux (for all time periods at issue in this case) of the Jehovah's Witnesses Organization's corporate structure, the policies and procedures in place for handling accusations of child sex abuse, how the Service Department communicated with local congregations, and the process for the appointment and deletion of elders and ministerial servants. You did not come to the call with any potential alternative witnesses. Please let me know as soon as possible if there are other non "apex" witnesses with substantially similar, first hand, personal knowledge as Shuster, Breaux, and Smalley (for all time periods at issue in this case) of the Jehovah's Witnesses Organization's corporate structure, the policies and procedures in place for handling accusations of child sex abuse, how the Service Department communicated with local congregations, and the process for the appointment and deletion of elders and ministerial servants.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP

A handwritten signature in black ink, appearing to read 'JCM', is written over the typed name 'James C. Murnion'.

James C. Murnion