

Exhibit O

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IRWIN M. ZALKIN, ESQ. (#89957)
DEVIN M. STOREY, ESQ. (#234271)
LISA J. GARY, ESQ. (#272936)
ALEXANDER S. ZALKIN, ESQ. (#280813)
The Zalkin Law Firm, P.C.
12555 High Bluff Drive, Suite 260
San Diego, CA 92130
Tel: 858-259-3011
Fax: 858-259-3015
Email: irwin@zalkin.com
dms@zalkin.com
lisa@zalkin.com
alex@zalkin.com

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

Jose Lopez, Individually,

Plaintiff,

v.

Defendant Doe 1, Linda Vista Church;
Defendant Doe 2, Supervisory
Organization; Defendant Doe 3,
Perpetrator; and Does 4 through 100,
inclusive,

Defendants.

) Case No: 37-2012-00099849-CU-PO-CTL

) **NOTICE OF RULING**

) Dept: 65
) Judge: Hon. Joan M. Lewis

) Trial Date: None

) **"IMAGED FILE"**

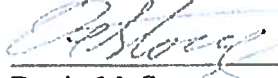
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Please find attached the executed statement of decision regarding Plaintiff's Motion for Sanctions, Including Terminating Sanctions and Monetary Sanctions in the Amount of \$37,799.21, Against Watchtower Bible and Tract Society of New York, Inc., For Failure to Comply With This Court's Orders.

Dated: 7-2-14

Respectfully Submitted,



Devin M. Storey
Attorney for Plaintiff

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

F I L E D
Clerk of the Superior Court

MAY 30 2014

11:24
10/29/15

By: _____ Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

Jose Lopez, Individually,

Plaintiff,

v.

Defendant Doe 1, Linda Vista Church;
Defendant Doe 2, Supervisory
Organization; Defendant Doe 3,
Perpetrator; and Does 4 through 100,
inclusive,

Defendants.---

Case No: 37-2012-00099849-CU-PO-CTL

**STATEMENT OF DECISION
REGARDING PLAINTIFF'S MOTION
FOR MONETARY AND
TERMINATING SANCTIONS**

Date: May 2, 2014
Time: 8:30 a.m.
Dept: 65
Judge: Hon. Joan M. Lewis

Trial Date: 6-27-14

"IMAGED FILE"

Plaintiff's Motion for Sanctions Including Terminating Sanctions and Monetary Sanctions in the Amount of \$37,799.21, Against Watchtower Bible and Tract Society of New York, Inc., for Failure to Comply with this Court's Orders came on regularly for hearing at 8:30

1 a.m. on Friday, May 2, 2014 in Department 65 of the San Diego County Superior Court located
2 at 330 W. Broadway, San Diego, California 92101. Plaintiff Jose Lopez was represented by
3 Irwin M. Zalkin, Esq., and Devin M. Storey, Esq. Defendant Watchtower Bible and Tract
4 Society of New York, Inc. (hereinafter "Watchtower") was represented by Rocky K. Copley,
5 Esq. This Court considered:

- 6
7 1. Plaintiff's Motion for Sanctions Including Terminating Sanctions and Monetary
8 Sanctions in the Amount of \$37,799.21, Against Watchtower Bible and Tract
9 Society of New York, Inc., for Failure to Comply with this Court's Orders; the
10 memorandum of points and authorities filed in connection therewith, the
11 declaration of Devin M. Storey, the declaration of Irwin M. Zalkin, and
12 Plaintiff's Exhibits 1-50;
- 13
14 2. Defendant's memorandum of points and authorities in opposition to Plaintiff's
15 motion; the Declaration of Rocky K. Copley, and Defendant's Exhibits 1-8;
- 16
17 3. Plaintiff's reply memorandum; the declaration of Devin M. Storey, and
18 Plaintiff's Exhibits 51-54;
- 19
20 4. Defendant's objection to new evidence and issues raised in Plaintiff's reply and
21 sur-reply; the declaration of Richard Ashe, Jr.;
- 22
23 5. The seven page document entitled "Key Opinions" electronically signed by
24 Monica Appelwhite, Ph.D. and dated November 30, 2013, and the two page
25 document entitled "Examples of WT Efforts to Raise Public Awareness about
26 Child Abuse from 1981 to 1986", which contained nine pages of exhibits, that
27 were offered into evidence by Watchtower at the hearing on Plaintiff's motion
28 and, hearing no objection by Plaintiff, were accepted into evidence as
Defendant's Exhibits 9 and 10; and

1 members, district overseers, circuit overseers, elders, ministerial servants, pioneers,
2 baptized publishers and individuals from 1979 to the present[.]

3 Plaintiff's request number 12 sought:

4 [a]ll letters, emails, facsimiles, or other documentary, tangible, or electronically stored
5 information of any kind, Watchtower Bible and Tract Society of New York, Inc.
6 received in response to the Body of Elder Letter Dated March 14, 1997.

6 (Plaintiff's Exhibit 19, PMQ Notice at pp. 4, 5.)

7 On October 9, Watchtower served by mail Defendant Watchtower's Objection to
8 Plaintiff's Notice of Taking Deposition of Person Most Qualified and Request for Production of
9 Documents ("PMQ Objections.") (Defendant's Exhibit B, PMQ Objections.) Watchtower
10 objected to all 30 testimonial topics identified in the PMQ Notice, and to all 29 categories of
11 document production. (Defendant's Exhibit B, PMQ Objections.) Watchtower specifically
12 objected to Plaintiff's request for production number 5, as follows:
13

14 [o]bjections: This Defendant objects to this request to the extent that it is overly broad as
15 to time and scope since the relevant time period ended in 1986. This Defendant also
16 objects to this request to the extent that it seeks information specifically protected from
17 discovery by the minister-communicant privilege. (California Evidence Code § 1034.)
18 This Defendant also objects to this request to the extent that it seeks information that is
19 protected from discovery by the attorney-client privilege and the attorney work product
20 doctrine. This Defendant also objects to this request to the extent it seeks information
21 not reasonably calculated to lead to the discovery of admissible evidence in this case.
22 This Defendant also objects to this request to the extent that it seeks information that
23 would violate the privacy of persons who are not parties to this litigation. Finally
24 Defendant objects to this request as unduly burdensome with the intended purpose to
25 harass and solicit other clients.

26 Watchtower similarly objected to Plaintiff's request for production number 12, as
27 follows:
28

[o]bjections: This Defendant objects to this request to the extent that it is overly broad as
to time and scope since the relevant time period ended in 1986. This Defendant also
objects to this request to the extent that it seeks information specifically protected from
discovery by the minister-communicant privilege. (California Evidence Code § 1034.)
Defendant further specifically objects to this request to the extent that it seeks
information related to religious beliefs, practices and internal governance because the
First Amendment of the U.S. Constitution and its California analog bars civil courts
from evaluating or interpreting such religious evidence in order to reach a decision. (See

1 *Serbian Eastern Orthodox Diocese v. Milivojevich* (1976) 426 U.S. 696.) This
2 Defendant also objects to this request to the extent that it seeks information that is
3 protected from discovery by the attorney-client privilege and attorney work product
4 doctrine. Finally, this Defendant also objects to this request to the extent that it seeks
5 information not reasonably calculated to lead to the discovery of admissible evidence in
6 this case.

(Defendant's Exhibit 1B, PMQ Objections at pp. 20-21, 25.)

7 On October 25, 2014, following the hearing on Defendants' Joint Motion for Summary
8 Judgment, the parties and this Court discussed the outstanding discovery issues in the case, and
9 this Court ordered the appointment of Judge Vincent Di Figlia (Ret.) as discovery referee.
10 (Plaintiff's Exhibit 21, Minute Order Dated October 25, 2013.)

11 On November 7, 2013, Plaintiff served by mail the Notice of Taking Deposition of
12 Gerrit Losch, with Production of Document Required – Videorecorded for Use at Trial ("Losch
13 Notice.") (Defendant's Exhibit 1C, Losch Notice.) The deposition was noticed to occur at 100
14 Watchtower Drive, Patterson, NY 12563. (Defendant's Exhibit 1C, Losch Notice.)

15 On December 13, 2013, Judge Di Figlia heard argument on Plaintiff's motions regarding
16 the depositions of the PMQ and Gerrit Losch. (Declaration of Storey at ¶ 44.) On December
17 20, 2013, Judge Di Figlia issued his recommendations that Plaintiff be allowed to take the
18 depositions of Gerrit Losch and the PMQ, and that the requested documents be produced.
19 (Defendant's Exhibit 1L, Recommendations of Discovery Referee.)

20 On December 27, 2013, Watchtower filed objections to the discovery referee's
21 recommendation. (Defendant's Exhibit 1, Objection to Recommendation of Referee.) On
22 January 2, 2014, this Court heard Plaintiff's ex parte application to compel compliance with the
23 discovery referee's recommendations. (Plaintiff's Exhibit 27, Minute Order Dated January 2,
24 2014.) This Court considered the recommendations of the discovery referee, as well as
25 Watchtower's objections thereto, and adopted the recommendations as the order of this Court.
26 (Plaintiff's Exhibit 27, Minute Order Dated January 2, 2014.) This Court ordered that "Counsel
27
28

1 have 90 days to take depositions and produce documents.” (Plaintiff’s Exhibit 27, Minute
2 Order Dated January 2, 2014.)

3 On January 15, 2014, Plaintiff’s counsel wrote to Watchtower’s attorneys proposing
4 dates, times and locations for the depositions of Mr. Losch and the PMQ. (Plaintiff’s Exhibit
5 29, January 15, 2014 Letter from Devin M. Storey.) On January 22, 2014, Plaintiff’s lawyers
6 contacted Watchtower’s attorneys via email requesting a response to the January 15, 2014 letter
7 and proposing the same dates. (Plaintiff’s Exhibit 30, January 22, 2014 Email from Irwin M.
8 Zalkin.) On January 22, 2014, Watchtower’s attorney responded that Watchtower would seek a
9 stay of this Court’s order and did not agree to the dates proposed by Plaintiff, nor did he suggest
10 alternative dates. (Plaintiff’s Exhibit 31, January 22, 2014 Letter from Rocky K. Copley.)

11
12 On January 30, 2014, Watchtower appeared *ex parte* seeking to set a motion for leave to
13 file a First Amended Answer to Plaintiff’s First Amended Complaint, and Mr. Losch also
14 appeared *ex parte* requesting the *pro hac vice* admission of his personal counsel. (Plaintiff’s
15 Exhibit 32, Transcript of the January 30, 2014 Hearing.) In discussing this Court’s prior
16 discovery orders, this Court encouraged Watchtower and Mr. Losch to cooperate with Plaintiff
17 in setting the deposition dates. (Plaintiff’s Exhibit 32, Transcript of the January 30, 2014
18 Hearing at pp. 10:10-11:9.)

19
20 On February 3, 2014, Plaintiff’s Counsel again informally requested Watchtower’s
21 cooperation in setting the date for the deposition of the PMQ. (Plaintiff’s Exhibit 33, February
22 3, 2014 Letter from Irwin M. Zalkin.) On February 4, 2014, Plaintiff’s Counsel informally
23 requested the cooperation of Mr. Losch’s local counsel in establishing the date of Mr. Losch’s
24 deposition. (Plaintiff’s Exhibit 34, February 4, 2014 Letter from Irwin M. Zalkin.) On
25 February 5, 2014, Mr. Losch’s attorney denied that Mr. Losch was the subject of a valid
26 deposition notice, request for production of documents, or court order, and did not agree to
27
28

1 work with Plaintiff's Counsel in setting deposition dates. (Plaintiff's Exhibit 35, February 5,
2 2014 Letter from Megan S. Wynne.)

3 On February 6, 2014, Watchtower appeared ex parte seeking an order staying the
4 January 2, 2014 order for 60 days while it pursued appellate review. (Defendant's Exhibit 3,
5 Watchtower's ex parte Application for Stay.) The requested order was denied. (Plaintiff's
6 Exhibit 36, Minute Order Dated February 6, 2014.) This Court instructed "Attorney Copley to
7 inform counsel for Mr. Losch, that there is a court order re taking Mr. Losch's deposition and
8 the order should be followed." (Plaintiff's Exhibit 36, Minute Order Dated February 6, 2014.)
9 This Court warned that non-compliance with the order to produce Mr. Losch for his deposition
10 could result in a contempt proceeding. (Plaintiff's Exhibit 37, Transcript of the February 6,
11 2014 Hearing at pp. 9:26-10:14.)
12

13 On March 5, 2014, Plaintiff appeared ex parte for an order setting deposition dates for
14 Mr. Losch and the PMQ. (Plaintiff's Exhibit 39, Transcript of the March 5, 2014 Hearing.)
15 Based on the stipulation of the parties, this Court ordered that the PMQ Deposition must take
16 place on March 31, 2014 and April 1, 2014 in Brooklyn, NY. (Plaintiff's Exhibit 38, Minute
17 Order Dated March 5, 2014.) This Court also ordered the deposition of Gerrit Losch to occur
18 on April 2, 2014 and April 3, 2014 in Brooklyn, NY. (Plaintiff's Exhibit 38, Minute Order
19 Dated March 5, 2014.) This Court advised that Watchtower's failure to provide the ordered
20 documents may result in motions for sanctions. (Plaintiff's Exhibit 39, Transcript of the March
21 5, 2014 Hearing at pp. 25:23-27:8.)
22

23 On March 12, 2014, Watchtower's attorneys informed Plaintiff's Counsel that
24 Watchtower intended to challenge this Court's order by filing a petition for writ of mandate, and
25 if necessary, a petition for review with the Supreme Court of California, challenging this
26 Court's order requiring the production of child abuse documents. (Declaration of Rocky K.
27
28

1 Copley at ¶ 9; Plaintiff's Exhibit 41, March 12, 2014 Letter from Rocky K. Copley.)
2 Watchtower also announced its intention to similarly challenge the portion of this Court's order
3 requiring Watchtower to produce its managing agent Gerrit Losch to be deposed. (Plaintiff's
4 Exhibit 41, March 12, 2014 Letter from Rocky K. Copley.) Watchtower made clear that it
5 would not produce the ordered child abuse documents, but offered to produce its PMQ on other
6 topics. (Declaration of Rocky K. Copley at ¶ 9; Plaintiff's Exhibit 41, March 12, 2014 Letter
7 from Rocky K. Copley.)
8

9 On March 13, 2014, personal counsel for Gerrit Losch advised Plaintiff's Counsel that
10 Mr. Losch intended to file a petition for writ of mandate challenging this Court's order, and if
11 necessary a petition for review with the Supreme Court of California. (Plaintiff's Exhibit 42,
12 March 13, 2014 Letter from Megan S. Wynne.) Mr. Losch's Counsel noted that if Mr. Losch's
13 appellate efforts were unsuccessful, then his Counsel would notify Plaintiff's attorneys "if Mr.
14 Losch will voluntarily appear for his deposition." (Plaintiff's Exhibit 42, March 13, 2014 Letter
15 from Megan S. Wynne.)
16

17 On March 20, 2014, Watchtower filed a petition for writ of mandate challenging this
18 Court's January 2, 2014 order. (Declaration of Rocky K. Copley at ¶ 13.) On March 24, Gerrit
19 Losch also filed a petition for writ of mandate. (Declaration of Rocky K. Copley at ¶ 8.) Both
20 Watchtower and its managing agent requested an immediate stay of this Court's order.
21 (Declaration of Devin M. Storey at ¶ 84.) On March 27, 2014, both petitions for writ of
22 mandate, and the associated stay requests, were denied. (Declaration of Rocky K. Copley at ¶¶
23 8, 13; Plaintiff's Exhibit 45, Order Denying Losch Petition for Writ of Mandate; Plaintiff's
24 Exhibit 46, Order Denying Watchtower Petition for Writ of Mandate.)
25

26 On March 31, 2014 and April 1, 2014, Watchtower produced Richard Ashe, Jr. and
27 Mario Moreno, Esq., to provide the PMQ testimony. (Declaration of Rocky K. Copley at ¶ 15;
28

1 Declaration of Devin M. Storey at ¶¶ 91, 92.) Neither Mr. Ashe, nor Mr. Moreno, produced the
2 ordered documents regarding instances of childhood sexual abuse that were known to
3 Watchtower. (Declaration of Devin M. Storey at ¶ 91.)

4 On April 1, 2014, Mr. Losch's personal counsel filed a petition for review with the
5 Supreme Court of California and requested an immediate stay of this Court's January 2, 2014
6 and March 5, 2014 orders requiring Mr. Losch to appear and be deposed beginning on April 2,
7 2014. (Declaration of Rocky K. Copley at ¶ 8.) The Supreme Court did not issue the requested
8 emergency stay. (Declaration of Devin M. Storey at ¶¶ 94, 95.)

9 On April 2, 2014, Gerrit Losch did not appear to be deposed. (Plaintiff's Exhibit 54,
10 Transcript of Deposition of Gerrit Losch.) Plaintiff made a record of Mr. Losch's non-
11 appearance. (Plaintiff's Exhibit 54, Transcript of Deposition of Gerrit Losch.) Later that day
12 the Supreme Court denied Mr. Losch's petition for review. (Declaration of Rocky K. Copley at
13 ¶ 8.)

14 On April 8, 2014, Plaintiff filed and personally served Plaintiff's Motion for Sanctions
15 Including Terminating Sanctions and Monetary Sanctions in the Amount of \$37,799.21, Against
16 Watchtower Bible and Tract Society of New York, Inc., for Failure to Comply with this Court's
17 Orders.

18 DECISION

19 Plaintiff contends that Watchtower's refusal to comply this Court's orders requiring the
20 production of Gerrit Losch, and the PMQ's failure to produce documents establishing
21 Watchtower's knowledge of childhood sexual abuse complaints each constitute a misuse of the
22 discovery process. *See* Cal. Code Civ. Proc. § 2023.010. Plaintiff contends that only the
23 terminating and monetary sanctions requested by Plaintiff can adequately respond to
24 Watchtower's misuse of the discovery process. This Court agrees.

1 The only facts prerequisite to imposition of a discovery sanction are the party's failure to
2 comply with ordered discovery, and that the failure was willful. *Calvert Fire Ins. Co. v.*
3 *Cropper* (1983) 141 Cal.App.3d 901, 904. This Court finds that Defendant failed to comply
4 with this Court's orders requiring Watchtower to produce Mr. Losch for deposition, and to
5 produce the documents requested by Plaintiff in connection with the PMQ Notice. This Court
6 further finds that Watchtower's refusal to comply with this Court's orders was willful.
7 Watchtower's actions are a misuse of the discovery process warranting the imposition of
8 sanctions. *See* Cal. Code Civ. Proc. § 2023.010, subd. (g).

9
10 In opposing the motion, Watchtower made various arguments including that Mr. Losch
11 was not Watchtower's managing agent. Notwithstanding Defendant's contention regarding Mr.
12 Losch's position relative to Watchtower, this Court has found to the contrary and has ordered
13 his deposition to proceed.

14
15 Defendant also contends that it was not required to comply with this Court's orders
16 because it is exercising its appellate rights to challenge the validity of the underlying court
17 orders, and the Supreme Court of California had not definitively rejected its appellate efforts
18 prior to the dates ordered for the depositions of Gerrit Losch and the PMQ. The Court agrees
19 that Watchtower is within its rights to seek appellate review. However, in the absence of a stay
20 of this Court's orders, compliance therewith is required notwithstanding any pending writ
21 petition or petition for review. To date, no reviewing court has ordered this Court's earlier
22 orders stayed. As a result, there is no basis in the law for Watchtower to not fully comply with
23 these orders.

24
25 At the hearing of this motion, Watchtower devoted substantial time expressing its
26 disagreement with the underlying orders of this Court requiring the deposition of Mr. Losch,
27 and the production of documents relating to childhood sexual abuse complaints. However, the
28

1 validity of these orders is not at issue in the present motion. The issues raised by Plaintiff's
2 motion involve Watchtower's non-compliance with this Court's orders. This Court's discovery
3 orders are valid and remain in effect, and whether Defendant agrees with the orders is
4 inconsequential. Watchtower was ordered to provide discovery and did not do so.

5 In its sur-reply Defendant – citing to Richard Ashe Jr.'s declaration – states that to
6 produce the documents sought would be so time-consuming as to take years to search the
7 relevant records. However, the Court was unable to locate any evidence that Watchtower at any
8 time since the Court first ordered production months ago has even attempted to locate
9 responsive documents. Even at the hearing of this motion, Watchtower did not provide any
10 assurances that the documents were in the process of being gathered, or that any effort had been
11 made to comply with this Court's orders.

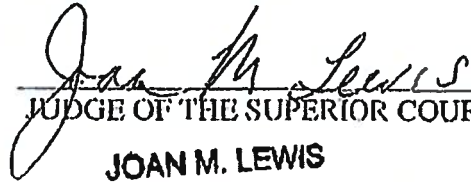
12 Having considered the evidence and argument before the Court – including this Court's
13 earlier orders and Watchtower's failure to comply and Defendant's failure to offer a valid basis
14 for the failure to comply – the Court grants Plaintiff's motion for terminating sanctions and
15 orders Watchtower's answer stricken.

16 This Court considered ordering the imposition of either issue sanctions or evidence
17 sanctions in lieu of the terminating sanctions requested by Plaintiff. However, Plaintiff has
18 made a showing that the materials requested are relevant to nearly aspect of Plaintiff's claim,
19 including his negligence based causes of action, ratification based cause of action, and his
20 prayer for punitive damages, as well as to Defendants' claimed statute of limitations defenses.
21 Given Watchtower's willful refusal to comply with multiple orders of this Court, and the fact
22 that Watchtower produced no evidence of any attempt to comply with this Court's orders, this
23 Court finds that only terminating sanctions can effectively respond to Watchtower's willful
24 refusals.
25
26
27
28

1 This Court additionally grants Plaintiff's request for monetary sanctions in the amount
2 of \$37,799.21 for the reasons argued in Plaintiff's papers, including the expenses associated
3 with traveling to New York relative to the scheduled Losch deposition.
4

5
6
7 DATED:

6/4/14


JUDGE OF THE SUPERIOR COURT
JOAN M. LEWIS

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

FILED
CIVIL BUSINESS OFFICE 8
CENTRAL DIVISION

Lopez v. Defendant Doe I, Linda Vista Church, et al.
San Diego County Superior Court Case No: 37-2012-00099849-CU-PO-CTL

14 MAY 30 PM 12:41
SAN DIEGO COUNTY COURT

I, Karen L. Waldvogel, am employed in the city and county of San Diego, State of California. I am over the age of 18 and not a party to the action; my business address is: 12555 High Bluff Drive, Suite 301, San Diego, CA 92130.

On May 30, 2014, I caused to be served:

STATEMENT OF DECISION REGARDING PLAINTIFF'S MOTION FOR MONETARY AND TERMINATING SANCTIONS; REQUEST FOR ENTRY OF DEFAULT;

in this action by placing a true and correct copy of said document(s) in sealed envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

XX (BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Diego, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

(By E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the party to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the email address listed below. I did not receive, within a reasonable time after the transmission, any electronic messages or other indication that the transmissions were unsuccessful.

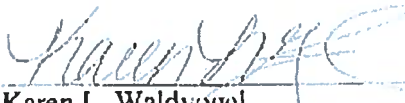
XX (BY PERSONAL SERVICE) By causing to be delivered by hand on the date listed above to the following parties by Knox Attorney Service:

Rocky K. Copley, Esq.
Law Office of Rocky K. Copley
225 Broadway, Suite 2100
San Diego, CA 92101

James M. McCabe, Esq.
The McCabe Law Firm, APC
4817 Santa Monica Avenue, Suite B
San Diego, CA 92107

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: May 30, 2014


Karen L. Waldvogel

SERVICE LIST

VIA PERSONAL SERVICE AND U.S. MAIL

Rocky K. Copley, Esq.
Law Office of Rocky K. Copley
225 Broadway, Suite 2100
San Diego, CA 92101
Tel: 619-232-3131
Fax: 619-232-1690
email: rkcopey@rkc-rocklaw.com
Attorney for Defendant
Supervisory Organization, Watchtower Bible and Tract Society of New York, Inc.

James M. McCabe, Esq.
The McCabe Law Firm, APC
4817 Santa Monica Avenue, Suite B
San Diego, CA 92107
Tel: 619-224-2848
Fax: 619-224-0089
email: jim@mccabelaw.net
Attorneys for Defendant
Linda Vista Church

VIA U.S. MAIL

Calvin A. Rouse, Esq.
Watchtower Bible & Tract Society of New York, Inc.
Legal Department
100 Watchtower Drive
Patterson, NY 12563-90204
Tel: 845-306-0700 x 46760
Fax: 845-306-0709
email: crouse@jw.org
Co-Counsel for Defendant
Supervisory Organization, Watchtower Bible and Tract Society of New York, Inc.

PROOF OF SERVICE

Lopez v. Defendant Doe 1, Linda Vista Church, et al.
San Diego County Superior Court Case No: 37-2012-00099849-CU-PO-CTL

I, Lisa E. Maynes, am employed in the city and county of San Diego, State of California. I am over the age of 18 and no a party to the action; my business address is 12555 High Bluff Drive, Suite 260, San Diego, CA 92130.

July 2, 2014, I caused to be served:

NOTICE OF RULING

in this action by placing a true and correct copy of said documents(s) in sealed envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

XX (BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Diego, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

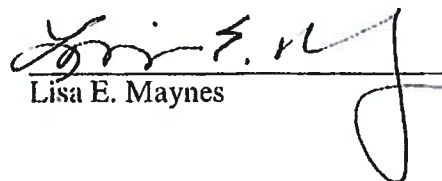
(BY PERSONAL SERVICE) By causing to be delivered by hand to the offices of the addressee(s) on the date listed above.

(BY OVERNIGHT DELIVERY – FEDERAL EXPRESS) I enclosed the documents in an envelope or package provided by an Federal Express and addressed to the persons at the addresses listed below. I placed the envelope or package for collection and overnight delivery at an office of a regularly utilized drop box for Federal Express. Overnight Delivery to Calvin A. Rouse, Esq. - Watchtower Bible & Tract Society of New York, Inc.

(BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the party to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the email address listed below. I did not receive, within a reasonable time after the transmission, any electronic messages or other indication that the transmissions were unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: 7-2-14


Lisa E. Maynes

MAILING LIST

Rocky K. Copley, Esq.
Law Office of Rocky K. Copley
225 Broadway, Suite 2100
San Diego, CA 92101
Tel: 619232-3131
Fax: 619-232-1690
email: rkcopley@rkc-rocklaw.com
Attorney for Defendant
Doe 2, Supervisory Organization, Watchtower Bible and Tract Society of New York, Inc.

James M. McCabe, Esq.
The McCabe Law Firm, APC
4817 Santa Monica Avenue, Suite B
San Diego, CA 92107
Tel: 619-224-2848
Fax: 619-224-0089
email: jim@mccabelaw.net
Attorneys for Defendant
Doe 1, Linda Vista Church

Calvin A. Rouse, Esq.
Watchtower Bible & Tract Society of New York, Inc.
Legal Department
100 Watchtower Drive
Patterson, NY 12563-90204
Tel: 845-306-0700 x 46760
email: crouse@jw.org
Co-Counsel for Defendant
Doe 2, Supervisory Organization, Watchtower Bible and Tract Society of New York, Inc.