

Exhibit C

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

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JOSE LOPEZ, individually
Plaintiff,

Index No.
37-2012-00099849-
CU-PO-CTL

-V-

DEFENDANT DOE 1, Linda Vista Church
DEFENDANT DOE 2, Supervisory
Organization; DEFENDANT DOE 3,
Perpetrator; and Does 4 through 100,
inclusive,
Defendants.

- - - - - x

VOLUME I
DEPOSITION OF
RICHARD ASHE
BROOKLYN, NEW YORK
MARCH 31, 2014
CORRECTED TRANSCRIPT

ATKINSON-BAKER, INC.
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REPORTED BY: LA VERNE HAIRSTON
FILE# A803782

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R. ASHE

Department a need or an issue that it wants the Service Department to address and communicate to the bodies of elders of the congregations of the United States for example?

MR. COPLEY: Objection, vague, compound. Go ahead.

A. Within my knowledge, I do not know that that has happened. The Service Department recognizes needs that develop or exist within the United States field. So we identify those things.

Q. And before a body of elder letter is issued, is the content of that letter, does that have to be approved by the governing body before it is distributed?

A. No, it does not.

Q. Does the governing body have any involvement in the information guidelines or instructions that are contained in the body of elder letters?

A. It depends on what the letter is.

Q. So there might be a circumstance where the content of that letter, the

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R. ASHE

guidelines, recommendations or instructions might be of a matter that the governing body would want to have some input on; is that correct?

A. If it is a matter of policy, the governing body would approve it. Although they would not likely generate it.

Q. So if it is a matter of policy, then the governing body will approve it or must approve it?

A. Yes.

Q. Up until 2001, at least in terms of bodies of elders letters that have been distributed to congregations within the United States to bodies of elders of congregations in the United States, they seem to come on the letterhead of the Watchtower Bible and Tract Society of New York; is that correct?

A. That's correct, up until 2001.

Q. And since 2001, they now appear on the letterhead of the Christian Congregation of Jehovah Witnesses, correct?

A. That is correct.