

Exhibit A

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8 WATCHTOWER BIBLE AND TRACT
9 SOCIETY OF NEW YORK, INC.

10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF ALAMEDA

13 JANE DOE,

14 Plaintiff,

15 vs.

16 THE WATCHTOWER BIBLE AND TRACT
17 SOCIETY OF NEW YORK, INC., a
18 corporation; THE WATCHTOWER BIBLE
19 AND TRACT SOCIETY OF
20 PENNSYLVANIA, a corporation; THE
21 GOVERNING BODY OF JEHOVAH'S
22 WITNESSES, an unincorporated association;
23 JEHOVAH'S WITNESSES ON PERALTA
24 BLVD. FREMONT, an entity; KINGDOM
25 HALL OF JEHOVAH'S WITNESSES, a
26 corporation; JONATHAN KENDRICK, an
27 individual; and ROES 1 to 10,

28 Defendants.

Case No.: HG11558324

**DEFENDANT WATCHTOWER BIBLE
AND TRACT SOCIETY OF NEW YORK,
INC.'S RESPONSES TO PLAINTIFF'S
REQUESTS FOR ADMISSION, SET
THREE**

PROPOUNDING PARTY: Plaintiff JANE DOE

RESPONDING PARTY: Defendant WATCHTOWER BIBLE AND TRACT SOCIETY OF
NEW YORK, INC.

SET NUMBER: THREE (3)

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1 Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter
2 “Defendant”), by and through its undersigned counsel and pursuant California Code of Civil
3 Procedure section 2033, hereby responds to Plaintiff Jane Doe’s (“Plaintiff”) Demand for
4 Inspection of Documents, Things, and/or Places, Set Four, as follows.

5 **RESPONSES TO REQUESTS FOR ADMISSION, SET THREE**

6 **REQUEST FOR ADMISSION NO. 3:**

7 *Do you admit that, during the time he performed services as an Elder at the North*
8 *Congregation, Fremont, between January 1, 1993, and December 31, 1998, Gary*
9 *Abrahamson was acting as an agent of Watchtower Bible and Tract Society of New York,*
10 *Inc.?*

11
12 **RESPONSE NO. 3:**

13 Defendant admits that between January 1, 1993, and December 31, 1998, while Gary
14 Abrahamson was acting within the course and scope of his duties as an elder in the North
15 Congregation, Fremont, California, he was acting as an agent of Watchtower Bible and Tract
16 Society of New York, Inc.; however, Defendant denies that Gary Abrahamson was acting as an
17 agent of Watchtower Bible and Tract Society of New York, Inc., during any and all times that he
18 was not acting within the course and scope of his duties as an elder in the North Congregation,
19 Fremont, California.
20

21
22 **REQUEST FOR ADMISSION NO. 4:**

23 *Do you admit that, during the time he performed services as an Elder at the North*
24 *Congregation, Fremont, between January 1, 1993, and December 31, 1998, Michael Clark*
25 *[sic] was acting as an agent of Watchtower Bible and Tract Society of New York, Inc.?*

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1 **RESPONSE NO. 4:**

2 Defendant admits that between January 1, 1993, and December 31, 1998, while Michael
3 Clarke was acting within the course and scope of his duties as an elder in the North
4 Congregation, Fremont, California, he was acting as an agent of Watchtower Bible and Tract
5 Society of New York, Inc.; however, Defendant denies that Michael Clarke was acting as an
6 agent of Watchtower Bible and Tract Society of New York, Inc., during any and all times that he
7 was not acting within the course and scope of his duties as an elder in the North Congregation,
8 Fremont, California.
9

10 **REQUEST FOR ADMISSION NO. 5:**


11 *Do you admit that, during the time he performed services as an Elder at the North*
12 *Congregation, Fremont, between January 1, 1993, and December 31, 1998, Larry Lamberdin*
13 *[sic] was acting as an agent of Watchtower Bible and Tract Society of New York, Inc.?*
14

15 **RESPONSE NO. 5:**

16 Defendant admits that between January 1, 1993, and December 31, 1998, while Larry
17 Lamerdin was acting within the course and scope of his duties as an elder in the North
18 Congregation, Fremont, California, he was acting as an agent of Watchtower Bible and Tract
19 Society of New York, Inc.; however, Defendant denies that Larry Lamerdin was acting as an
20 agent of Watchtower Bible and Tract Society of New York, Inc., during any time that he was not
21 acting within the course and scope of his duties as an elder in the North Congregation, Fremont,
22 California.
23

24 DATED: December 8, 2011

JACKSON LEWIS LLP

25 By 
26 Robert J. Schnack

27 Attorneys for Defendant
28 WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.

**JANE DOE v. THE WATCHTOWER BIBLE
AND TRACT SOCIETY OF NEW YORK, INC., et al.
Alameda Superior Court Case No. HG11558324**

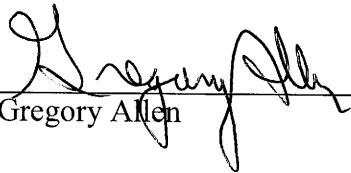
VERIFICATION

I am a duly authorized representative of Defendant Watchtower Bible and Tract Society of New York, Inc. in the above-entitled action.

I have read the foregoing **DEFENDANT WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.' S RESPONSES TO PLAINTIFF'S REQUEST FOR ADMISSIONS, SET THREE** to which this verification is attached. As to factual statements set forth therein for which I have personal knowledge, I declare that such statements are true and correct to the best of my knowledge. To the extent that factual statements contained therein represent composites of knowledge of various other persons, including or not including myself, I believe that such statements are true and correct.

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

Executed this 9 day of December, 2011, at Patterson, New York.



Gregory Allen