

***Exhibit B***

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12 Attorneys for Plaintiff

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

15 Jose Lopez, Individually,

16 Plaintiff,

17 v.

18 Defendant Doe 1, Linda Vista Church, and  
19 Defendant Doe 2, Supervisory  
20 Organization, Defendant Doe 3,  
21 Perpetrator, and Does 4 through 100,  
22 inclusive,

23 Defendants.

24 ) Case No: 37-2012-0099849-CU-PO-  
25 ) CTL

26 ) **STIPULATION RE FOUNDATION**  
27 ) **OF DOCUMENTS AND AGENCY**  
28 ) **OF INDIVIDUALS IN SPECIFIED**  
29 ) **POSITIONS**

30 ) **Dept: C-65**  
31 ) **Judge: Joan M. Lewis**  
32 ) **Trial: None Set**

33 Plaintiff Jose Lopez (hereinafter Plaintiff) and Defendant Linda Vista Spanish  
34 Congregation of Jehovah’s Witnesses, San Diego, California, and Defendant Watchtower Bible  
35 and Tract Society of New York, Inc. (hereinafter “the Church Defendants”), by and through  
36 their respective counsel of record, hereby stipulate to the foundation and business record status  
37 of documents produced by the parties in discovery and the agency status of individuals holding  
38 the positions of Elder or Ministerial Servant.

1 Plaintiff and the Church Defendants further agree and stipulate that the stipulations  
2 agreed to herein shall be maintained in confidence and shall be used for the sole and exclusive  
3 purposes of preparing this action for motions, hearings, trial or appeal, and shall not be  
4 disclosed to any person or entity for any purpose unrelated to the prosecution of the present  
5 litigation. The agreements reached herein are not intended to be used, and are specifically  
6 intended to be of no effect in any other action.

7  
8 STIPULATED AGREEMENT

9 WHEREAS, Plaintiff Jose Lopez has commenced an action alleging sexual abuse at the  
10 hands of Gonzalo Campos while Campos was one of Jehovah's Witnesses, wherein Plaintiff has  
11 commenced this action against Defendant Linda Vista Spanish Congregation of Jehovah's  
12 Witnesses, Defendant Watchtower Bible and Tract Society of New York, Inc., and Defendant  
13 Gonzalo Campos. Defendant Gonzalo Campos is not a signatory to this Stipulation;

14 WHEREAS, all parties to this stipulation have engaged in the discovery process, and  
15 either have produced documents in response to requests for production of documents or by  
16 agreement will be producing documents in response to requests for production of documents,  
17 and the parties to this stipulation seek to streamline the process of establishing the foundation of  
18 such documents, including their authenticity and business record status;

19  
20 WHEREAS, Gonzalo Campos was associated with Defendant Linda Vista Spanish  
21 Congregation of Jehovah's Witnesses at the time of the molestation of Plaintiff. At the time of  
22 the events that are the subject matter of this action, and prior to April of 2001, Defendant  
23 Watchtower Bible & Tract Society of New York, Inc., made the final determination of which  
24 men were appointed to the positions of Elder and Ministerial Servant for each Congregation of  
25 Jehovah's Witnesses in the United States;

26  
27 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:  
28

1 All Documents hereto produced in the above-captioned action by any party to this  
2 stipulation, as well as any document subsequently produced by any party to this stipulation, are  
3 genuine and authentic, and satisfy the requirements for authentication as that term is used in  
4 Evidence Code § 1400.

5 All Documents hereto produced in the above-captioned action by any party to this  
6 stipulation, as well as any document subsequently produced by any party to this stipulation,  
7 meets the requirements of a business record as that term is defined in Evidence Code § 1271.  
8

9 No party will challenge the foundation, genuineness, or business record status of any  
10 document produced at any time in this litigation by any party to this stipulation. Nothing in this  
11 stipulated agreement shall be construed to limit, in any way, any party's right to object to the  
12 admissibility of any document produced in this action, or any content included in any such  
13 document, on any other ground (relevance, hearsay on hearsay, etc.).  
14

15 Each individual holding the position of Ministerial Servant or Elder in any local  
16 congregation of Jehovah's Witnesses, including Linda Vista Spanish Congregation of Jehovah's  
17 Witnesses, is an agent, as that term is defined in Civil Code § 2295 of the local congregation in  
18 which they hold that title, as well as an agent of The Watchtower Bible and Tract Society of  
19 New York, Inc., for the time period prior to April 2001.

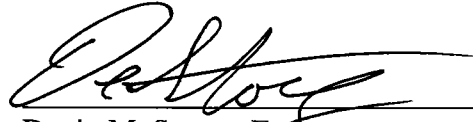
20 No Defendant will dispute that an individual holding the position of Elder or Ministerial  
21 Servant is an agent of the local congregation to which he is appointed during the period of time  
22 that he holds such positions, or that an individual holding such a position is an agent of The  
23 Watchtower Bible and Tract Society of New York, Inc. during the period of time prior to April  
24 2001 that he holds such position, and Plaintiffs will not conduct discovery for the purpose of  
25 establishing that each local congregation of Jehovah's Witnesses is an agent or alter ego of The  
26  
27  
28

1 Watchtower Bible and Tract Society of New York, Inc. Nothing in this agreement shall be  
2 construed to preclude any party from conducting discovery regarding other issues.

3 IT IS SO STIPULATED.


4 THE ZALKIN LAW FIRM, P.C.

5  
6 Dated: 2/28/13

  
7 Devin M. Storey, Esq.  
8 Attorney for Plaintiffs

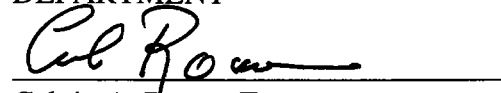
9 THE MCCABE LAW FIRM, APC

10 Dated: 2/28/13

  
11 James M. McCabe, Esq.  
12 Attorney for Linda Vista Spanish Congregation of  
13 of Jehovah's Witnesses

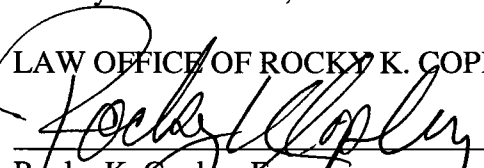
14 WATCHTOWER BIBLE & TRACT  
15 SOCIETY OF NEW YORK, INC., LEGAL  
16 DEPARTMENT

17 Dated: 2/28/13

  
18 Calvin A. Rouse, Esq.  
19 Attorney for the Watchtower Bible and Tract  
20 Society of New York, Inc.

21 LAW OFFICE OF ROCKY K. COPLEY

22 Dated: 2/28/13

  
23 Rocky K. Copley, Esq.  
24 Attorney for the Watchtower Bible and Tract  
25 Society of New York, Inc.