

Exhibit L

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THOMAS R. FALLQUIST
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

AIMEY MERIE VIGUE, a single person;)
ROBERT SCOTT VIGUE and KAY)
VIGUE, husband and wife,)
)
Plaintiffs,)
)
vs.)
)
EDWARD NORMAN DAVIS and)
CHERYLE RUSTAD, husband and wife and)
marital community thereof;)
WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.; WATCH)
TOWER BIBLE AND TRACT SOCIETY)
OF PENNSYLVANIA; CHRISTIAN)
CONGREGATION OF JEHOVAH'S)
WITNESSES; OPPORTUNITY)
CONGREGATION OF JEHOVAH'S)
WITNESSES,)
)
Defendants.)

No. 04-2-02451-4

DISCLOSURE OF LAY AND
EXPERT WITNESSES
[CHURCH DEFENDANTS]

COMES NOW the defendants WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC., CHRISTIAN CONGREGATION OF JEHOVAH'S WITNESSES,
and OPPORTUNITY CONGREGATION OF JEHOVAH'S WITNESSES (hereinafter

DISCLOSURE OF LAY AND EXPERT
WITNESSES [CHURCH DEFENDANTS] - 1

PAINE, HAMBLEN, COFFIN, BROOKE & MILLER LLP
717 WEST SPRAGUE AVENUE, SUITE 1200
SPOKANE, WA 99201 PHONE: (509) 455-6000

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1 “Church Defendants”), by and through their attorneys Paine, Hamblen, Coffin, Brooke &
2 Miller LLP, and Donald G. Stone, who pursuant to this Court’s revised scheduling order,
3 provide the following disclosure of lay and expert witnesses:
4

5 **Lay Witnesses:**

- 6 1. Aimey Merie Vigue
- 7 2. Robert Scott Vigue
- 8 3. Kay Vigue
- 9 4. Kathy Avery
- 10 5. Ronald Bain
- 11 6. Michael Basford
- 12 7. Kevin Bechtold
- 13 8. Aaron Blanchard
- 14 9. Colleen Davis (formerly Gilbert)
- 15 10. Edward N. Davis
- 16 11. Pauline Davis (formerly Gilbert)
- 17 12. Mike Gilbert
- 18 13. Cheryle Rustad Guerney (formerly Davis)
- 19 14. Ken Harding
- 20 15. Ronald Jilge
- 21 16. Angie Kilmer
- 22 17. Pat Kilmer
- 23 18. Ryan Learn

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- 19. Tom Lorenzen
- 20. Mr. Nigles
- 21. Mike Norman
- 22. Ary Spoelstra
- 23. Phil Vigue
- 24. Richard Zink
- 25. Records Custodian: Spokane County Prosecutor's Office
- 26. Washington Service Desk, Watchtower Bible and Tract Society of New York, Inc.
- 27. Washington Service Desk, Christian Congregation of Jehovah's Witnesses, Inc.
- 28. Corporate Designate, Watch Tower Bible and Tract Society of Pennsylvania, Inc., if not dismissed prior to trial.

Potential Expert Witnesses:


- 1. Ronald M. Klein, Ph.D. (Psychologist)
Behavioral Medicine Services
P.O. Box 30598
601 W. Main, Suite 1011
Spokane, WA 99223-3009
- 2. Jeffrey N. Younggren, Ph.D. (Psychologist)
827 Deep Valley Drive, Suite 309
Rolling Hills Estates, CA 90274
- 3. Gary Breaux (Elder of Jehovah's Witnesses)
2821 Route 22
Patterson, NY 12563
- 4. These defendants specifically reserve the right to call an economist and/or vocational therapist to the extent that plaintiffs assert any lost income claims.

1
2 The aforementioned witnesses may testify to subjects set forth in their previous
3 declarations or affidavits, if any, or other documents disclosed in discovery, and the
4 pleadings in this matter. The description of testimony is not intended to limit the testimony
5 and opinion may be offered consistent with ER 701, 702, 703, 704, and 705.

6
7 These defendants further reserve the right to call any witnesses identified by
8 plaintiffs or other defendants. These defendants further reserve the right to identify and call
9 witnesses as may be identified incidental to discovery herein.

10
11 DATED this 19th day of September, 2005.

12
13 PAINE, HAMBLIN, COFFIN,
14 BROOKE & MILLER LLP

15
16 By: 
17 Donald G. Stone, WSBA #7547
18 Devra Sigle-Hermosilla, WSBA #31169
19 Attorneys for CHURCH DEFENDANTS

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29 DISCLOSURE OF LAY AND EXPERT
30 WITNESSES [CHURCH DEFENDANTS] - 4

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of September, 2005, I caused to be served a true and correct copy of the foregoing document to the following:

David M. Miller
MILLER & PROTHERO
868 Paulsen Building
421 W. Riverside Avenue
Spokane, WA 99201

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Attorneys for PLAINTIFFS

Bevan J. Maxey
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Spokane, WA 99201

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Attorneys for DEFENDANT EDWARD
DAVIS

Dean E. White
Attorney at Law
430 W. Indiana Avenue
Spokane, WA 99205

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Attorneys for DEFENDANT CHERYLE
RUSTAD



Donald G. Stone
Devra Sigle-Hermosilla

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DISCLOSURE OF LAY AND EXPERT
WITNESSES [CHURCH DEFENDANTS] - 5

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