

EXHIBIT 3

Declaration of Joel M. Taylor

I, Joel M. Taylor, declare under the penalty of perjury:

1. I am over 21 years of age, of sound mind, and competent to make this declaration.

2. I provide this declaration in support of the Response to Plaintiffs' Motion for Sanctions, filed by Watchtower Bible and Tract Society of New York Inc. ("WTNY").

3. I am an attorney with the law firm of Miller McNamara & Taylor LLP and am admitted as *pro hac* counsel for WTNY in this lawsuit.

4. Neither WTNY nor its attorneys have paid for the legal fees of any non-party entity or deponent.

5. Neither WTNY nor its attorneys have participated in any deposition preparation of any non-party deponent.

6. As was the case during the deposition of Mr. Allen Shuster, I vehemently disagree with Plaintiffs' counsel mischaracterization of the implication of my head nod at the deposition.

7. As the deposition record reflects, at no point prior to the question at issue, did Mr. Shuster say in the deposition that the words that Plaintiffs' counsel attributed to him.

8. As explained on the record then after the false accusation of coaching, my head nod was simply a reflection of my displeasure with Plaintiffs' counsel blatant attempt to misuse a leading question to trap the witness, and nothing more.

9. Attached as Exhibit A to my declaration is an excerpt of the full interchange at the deposition reflecting my correction of Plaintiffs' counsel's misrepresentation.

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

DATED: May 2, 2024.


By: 
Joel M. Taylor

EXHIBIT A

1 A. SHUSTER

2 A. No.

3 Q. Is it correct that
4 congregations of Jehovah's Witnesses in the
5 19 -- excuse me.

6 Is it correct that between the
7 1970s and 1990s congregations of Jehovah's
8 Witnesses in the United States selected
9 their own elders?

10 A. That's correct.

11 Q. Is it correct that no approval
12 was required from any other entity or
13 organization for congregations in the
14 United States to select their own elders
15 between the 1970s and 1990s?

16 MS. KORGUL: I'll object to the
17 form. You can answer.

18 A. That's a little complicated
19 question. If you could simplify that for
20 me.

21 Q. Well, I think you've previously
22 testified, for example, that the Governing
23 Body approved the selection of elders
24 during certain periods of history in the
25 Jehovah's Witness --

1 A. SHUSTER

2 MS. KORGUL: I will object to
3 this.

4 MR. TAYLOR: Objection.

5 MS. KORGUL: I don't even --

6 MR. TAYLOR: He didn't say
7 that.

8 MS. KORGUL: -- know where
9 you're saying this from.

10 MR. TAYLOR: Where was that at?

11 MS. KORGUL: What are you
12 talking about?

13 Q. You can answer the question.

14 MS. KORGUL: No, no.

15 MR. TAYLOR: Objection.

16 MS. KORGUL: Objection.

17 Totally inappropriate.

18 Q. You can answer the question.

19 A. No.

20 MR. SHAFFER: For the record,
21 Joel Taylor just looked at the
22 witness and shook his head no, and
23 the witness answered no.

24 A. Well, no from the standpoint
25 I -- I don't quite understand the question.

1 A. SHUSTER

2 MR. TAYLOR: Just --

3 A. If you could --

4 MR. TAYLOR: -- for the record,
5 this is Mr. Taylor. I was not
6 signalling anything to anyone. I was
7 just objecting to his statement,
8 which clearly was not a statement
9 made on the record at the deposition
10 today.

11 MS. KORFUL: All right. I will
12 direct the witness not to answer this
13 question.

14 MR. MERRILL: What is the
15 basis --

16 MS. KORFUL: Let's move on.

17 MR. MERRILL: -- for your
18 direction?

19 MS. KORFUL: Because it's
20 totally inappropriate question.
21 You -- you are misstating the
22 testimony. He never testified today
23 that the Governing Body was selecting
24 the elders.

25 THE REPORTER: Can we go off

1 A. SHUSTER

2 the record, please?

3 MR. MERRILL: Yes.

4 THE VIDEOGRAPHER: All right.

5 We are off the record. The time is
6 10:31 A.M. Eastern Time.

7 (Whereupon, a short recess was
8 taken.)

9 THE VIDEOGRAPHER: We are back
10 on the record. The time is 10:44
11 A.M. Eastern Time.

12 MR. MERRILL: Okay. We got an
13 objection from your attorney, and an
14 instruction not to answer just before
15 the break, and I want to try and
16 clear up the record a little. And
17 I'm going to ask the Reporter to
18 please read back the question that
19 was pending, and then give you a
20 chance to state your objection, and
21 we'll go from there.

22 THE REPORTER: Can we go off
23 the record?

24 THE VIDEOGRAPHER: You're okay?

25 MR. MERRILL: Okay.

1 A. SHUSTER

2 THE VIDEOGRAPHER: All right.
3 We are off the record. The time is
4 10:45 A.M. Eastern Time.

5 (Whereupon, an off-the-record
6 discussion was held.)

7 THE VIDEOGRAPHER: We are back
8 on the record. The time is 10:46
9 A.M. Eastern Time.

10 Q. Mr. Shuster, during the 1970s,
11 did the Governing Body approve or confirm
12 the appointment of elders to congregations
13 of Jehovah's Witnesses in the United
14 States?

15 A. No. No.

16 Q. During the 1980s, did the
17 Governing Body approve or confirm the
18 appointment of elders to congregation -- in
19 congregations of Jehovah's Witnesses in the
20 United States?

21 A. No.

22 Q. During the 1990s, did the
23 Governing Body approve or confirm the
24 appointment of elders within congregations
25 of Jehovah's Witnesses in the United