

# EXHIBIT 4

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

TRACY CAEKAERT and CAMILLIA MAPLEY,  
PLAINTIFFS,

- against -

Case No.:  
CV-20-52-BLG-SPW

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW  
YORK, INC., and WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA,

DEFENDANTS.

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ARIANE ROWLAND and JAMIE SCHULZE,

PLAINTIFFS,

- against -

Case No.:  
CV-20-59-BLG-SPW

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW  
YORK, INC., and WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA,

DEFENDANTS.

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DATE: December 6, 2023

TIME: 9:09 A.M.

VIDEO-RECORDED EXAMINATION  
BEFORE TRIAL of the Non-Party Witness,  
ALLEN SHUSTER, taken by the Plaintiffs,  
pursuant to a Subpoena, held at the offices

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of Veritext Legal Solutions, 50 Main  
Street, 3rd Floor, White Plains, New York  
10606, before Alison DiTuro, a Notary  
Public of the State of New York.

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\* \* \*

1 A. SHUSTER

2 or what entity you sent that application  
3 to?

4 A. Not really, no.

5 Q. In 1976, was Bethel considered  
6 the world headquarters of Jehovah's  
7 Witnesses?

8 MS. KORFUL: I'll object to the  
9 form.

10 A. Repeat the question, please.

11 Q. In 1976, was Bethel considered  
12 the world headquarters of Jehovah's  
13 Witnesses?

14 A. No.

15 Q. Can you tell me what kind of  
16 information was included on your  
17 application to work at Bethel?

18 A. I can remember some  
19 specifics -- age, address, health, date of  
20 birth. Beyond that, I -- I don't remember.  
21 It's been a long time ago.

22 Q. Was that application approved  
23 by some entity in order for you to start  
24 working at Bethel?

25 MS. KORFUL: I'll object to the

1 A. SHUSTER

2 form, working.

3 A. Yeah. I'm not quite sure how  
4 it was approved.

5 Q. Is it correct that you began  
6 working in the service department in 1981?

7 MS. KORFUL: Again, objection.

8 Same objection.

9 A. I began working in the service  
10 department in 1981, yes.

11 Q. What did you do to prepare for  
12 today's deposition?

13 A. Not much. Met with my attorney  
14 here next to me, and that's about it.

15 Q. Did you meet with any attorneys  
16 from the Jehovah's Witness legal  
17 department?

18 A. I did not.

19 Q. Did you meet with any other  
20 members of the service department?

21 A. I did not.

22 Q. Do you have the -- a basic  
23 understanding of the claims in the  
24 litigation that we're here for your  
25 deposition for today?

1 A. SHUSTER

2 department will seek advice on specific  
3 scriptural matters and how the law bears on  
4 those scriptural principles.

5 Q. Paragraph 10 of the affidavits  
6 say that you have briefly reviewed the  
7 allegations in the operative complaint. Is  
8 that correct?

9 A. Correct.

10 Q. What is the operative  
11 complaint?

12 A. I have a vague recollection  
13 that this was sometime back maybe -- I  
14 don't remember how long ago, some months  
15 back when this was reviewed, and it's --  
16 it's a child abuse allegation, but I don't  
17 know the specifics. I don't recall the  
18 specifics.

19 Q. Is your reference to the  
20 complaint intended to refer to the  
21 complaint in either the Caekaert or Rowland  
22 case or both?

23 A. I think that would be the  
24 correct answer, yes. I don't know these  
25 parties.



1 A. SHUSTER

2 Objection to the form. You can  
3 answer.

4 A. Can you repeat the question,  
5 please?

6 MR. MERRILL: Please do.

7 (Whereupon, the referred to  
8 question was read back by the  
9 Reporter.)

10 MS. KORGUL: Same objection.

11 A. I don't know.

12 Q. Did you have any involvement  
13 with allegations of child sex abuse within  
14 Jehovah's Witness congregations in the  
15 United States between 1973 and 1992?

16 A. I don't know.

17 Q. Is that something that you  
18 would've forgotten?

19 A. It's a long time ago, that's  
20 for sure.

21 Q. Is that something you would've  
22 forgotten?

23 A. I don't think so.

24 Q. In your time at the service  
25 department, did you ever correspond with

1 A. SHUSTER

2 Q. Okay. And then the remaining  
3 pages of the exhibit should be those  
4 document page numbers, and you can confirm  
5 that by what's known as the bates-numbering  
6 in the lower right. If you turn the page,  
7 the first page you should see should be  
8 WTN591.

9 A. Okay.

10 Q. Based on the request on the  
11 page you just looked at, these are the 1995  
12 outlines from WTN5 to elders attending the  
13 Kingdom Ministry School, portions 19  
14 through 22 regarding helping abuse victims  
15 scripturally.

16 Do you agree with that?

17 A. I -- it's been so long ago.  
18 I'd have to...

19 MS. KORJUL: I'll object. He's  
20 not -- he's not representing  
21 Watchtower. You're asking him if  
22 this is the correct document produced  
23 by Watchtower?

24 MR. MERRILL: No. I'm asking  
25 him if he agrees with the description

1 A. SHUSTER

2 A. It's been a long time ago. I  
3 just don't remember. 1992, what's --  
4 that's 30 -- 30-some years, 31 years.

5 Q. Let's go to the document with  
6 page no. 598.

7 MS. KORFUL: You mean page or  
8 bates stamp?

9 MR. MERRILL: Page. Bates  
10 stamp, excuse me.

11 Q. Please take your time and read  
12 this full page and tell me when you're  
13 finished.

14 A. Okay. Okay.

15 MS. KORFUL: I was just looking  
16 further here.

17 THE WITNESS: Yeah.

18 Q. This is direction about how to  
19 handle an allegation of sexual abuse  
20 against a member of the congregation that  
21 was based on repressed memories; correct?

22 A. It appears that way.

23 Q. Were you involved in the  
24 creation of this document at all?

25 A. I don't remember.