

Exhibit A



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

COURT REPORTING

LEGAL VIDEOGRAPHY

VIDEOCONFERENCING

TRIAL PRESENTATION

MOCK JURY SERVICES

LEGAL TRANSCRIPTION

COPYING AND SCANNING

LANGUAGE INTERPRETERS

TRACY CAEKAERT, and CAMILLIA MAPLEY,

Plaintiffs,

v.

Cause No. CV 20-52-BLG-SPW

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

Defendants.

WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.

Cross-Claimant,

v.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

REMOTE VIDEOTAPED DEPOSITION OF

CAMILLIA MAPLEY

TAKEN ON

AEDT: WEDNESDAY, NOVEMBER 30, 2022; 5:12 A.M.

MST: TUESDAY, NOVEMBER 29, 2022; 11:12 A.M.

WORKSPACES - LEVEL 5

171 COLLINS STREET

MELBOURNE, 3000 AUSTRALIA



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1 there's two things going on.

2 **Q. You can elaborate.**

3 A. Well, it's Caekaert and Mapley.

4 **Q. Okay?**

5 A. So --

6 **Q. When you --**

7 A. -- what you're asking me is I can't recall
8 every single instance that occurred.

9 **Q. When your family joined the Hardin**
10 **Congregation, had Bruce Senior been sexually abusing**
11 **you for several years prior to that?**

12 A. Well, I don't recall, but I was a very
13 sexualized child, so I -- I don't recall.

14 **Q. What is the span of years over which you**
15 **claim Bruce Senior sexually abused you?**

16 A. Probably up until I was 14? Yeah.

17 **Q. Would that have been approximately 1982?**

18 A. Yeah.

19 **Q. And when did the sexual abuse start?**

20 A. I don't know.

21 **Q. How many years do you think the sexual**
22 **abuse went on?**

23 A. Well, if I just said 14, that sort of
24 gives you an idea.

25 **Q. Is it your belief that Bruce Senior**

1 **started sexually abusing you as soon as you were**
2 **born?**

3 **MR. SHAFFER:** Object to form. Asked and
4 answered.

5 **BY MR. SWEENEY:**

6 A. Yes.

7 **Q. Do you know if Bruce ever confessed to**
8 **anybody that he sexually abused you?**

9 A. Are you asking if he sat us down and
10 talked about abusing us?

11 **Q. We'll start there, so sure.**

12 A. Yes, then the answer is yes.

13 **Q. When did that happen?**

14 A. I don't know. After Gunner Hain was found
15 out.

16 **Q. Can you give me an approximate year?**

17 **MR. SHAFFER:** Object to form.

18 **BY MR. SWEENEY:**

19 A. '77? '78?

20 **Q. You had been about nine or ten?**

21 A. Yes, sorry. Sorry, I nodded.

22 **Q. And he -- who all did he sit down and**
23 **discuss this with?**

24 A. Himself, Shirley, Bruce Junior, Tracy and
25 myself.