

Exhibit A

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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.

-----X

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

1 A. SHUSTER

2 A. Not really.

3 MR. MERRILL: I need tabs 14
4 and 15 to be marked as the next
5 exhibit, please.

6 MR. STEPANS: In that order?

7 MR. MERRILL: Let's mark them
8 as a single exhibit. Combine them.

9 MS. KORGUL: Do you want this
10 back?

11 MR. MERRILL: I don't need that
12 back, thank you.

13 (Whereupon, affidavits of Allen
14 Shuster were marked as Plaintiffs'
15 Exhibit 2 for identification as of
16 this date by the Reporter.)

17 Q. Mr. Shuster, I'm handing you
18 what's been marked as Deposition Exhibit 2.
19 Will you please take a moment? There's two
20 documents there that are affidavits in
21 the -- what's known in shorthand as the
22 Caekaert case and the Rowland case.

23 A. Okay.

24 Q. Do you recognize those
25 documents, Mr. Shuster?

1 A. SHUSTER

2 A. I do, yes.

3 Q. Those are your affidavits from
4 the same two cases listed in the subpoena
5 that we discussed as Exhibit 1 this
6 morning; correct?

7 A. Correct.

8 Q. You signed both of those
9 documents; correct?

10 A. Correct.

11 Q. Did you draft those documents?

12 A. I helped draft, yes.

13 Q. Who else helped?

14 A. I don't know specifically.

15 Q. Paragraph two of each document
16 says that you have personal and direct
17 knowledge of the matters set forth;
18 correct?

19 A. Correct.

20 Q. Someone else drafted
21 information for you in these affidavits
22 that's part of your personal knowledge, and
23 you don't know who that person is. Is that
24 correct?

25 MS. KORGUL: Objection to the

1 A. SHUSTER

2 form. That's not what he said.

3 A. I provided information in
4 regard to this affidavit. I don't remember
5 who specifically helped in the preparation
6 of it.

7 Q. Who did you provide the
8 information to?

9 A. The legal department.

10 Q. I don't want to hear any advice
11 that the legal department gives you, but my
12 question is, do you communicate with the
13 legal department on a regular basis?

14 A. No.

15 Q. How often do you communicate
16 with the legal department?

17 A. I would say as a -- as an
18 on-need basis, periodically. I think that
19 would be the word I would use,
20 periodically.

21 Q. Can you help me understand what
22 periodically means in terms of every month,
23 every year, every ten years?

24 A. It depends on the situation at
25 hand. Sometimes we'll -- the service