

Exhibit B

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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.

-----X
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 7, 2023

TIME: 9:08 A.M.

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VIDEO-RECORDED EXAMINATION
BEFORE TRIAL of the Non-Party Witness,
MARVIN GENE SMALLEY, taken by the
Plaintiffs, pursuant to a Subpoena, held at
the offices 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.

1 M. SMALLEY

2 change over time?

3 A. It -- it was steady.

4 Q. Always the same amount?

5 A. \$14.

6 MS. KORFUL: Don't spend it all
7 in one place.

8 Q. Well, I take it you've learned
9 how to be frugal.

10 Tell me, when did you learn Ms.
11 Korgul was going to be your lawyer?

12 A. I guess two weeks ago.

13 Q. Okay. And how did you learn
14 that?

15 A. I think that a brother in the
16 legal department set up the appointment.

17 Q. Okay. And aside from your
18 lawyer -- I don't want to -- I should've
19 mentioned this. I don't want to know about
20 any discussions you've had with your lawyer
21 about this case.

22 But have you had discussions
23 about this case or your deposition with
24 anybody in the legal department?

25 MS. KORFUL: Okay. I will

1 M. SMALLEY

2 object to that, and I will direct you
3 not to answer based on privilege.

4 MR. SHAFFER: Can you please
5 repeat my question?

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

9 A. No. And as I told you earlier,
10 I do not know what this case is about.

11 Q. I understand.

12 I don't want to know about the
13 contents of any discussions you've had in
14 any of this line of questioning, but have
15 you had a discussion about this case with
16 Mr. Taylor?

17 A. With who?

18 Q. With Mr. Taylor.

19 A. He may be the one who informed
20 me that Margaret would --

21 MS. KORGUL: Okay.

22 A. -- be here.

23 MS. KORGUL: I -- all right.

24 So I -- I object to this line of
25 questioning between content -- about