

# *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.

-----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 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