

Exhibit C

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

TRACY CAEKAERT, and
CAMILLIA Mapely,

Plaintiffs,

vs.

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,

_____)

Expert Videotaped Deposition
In Person/Zoom Videoconference

Bradley Lovett

August 11, 2023

Reported By: Gidgette Nieves, CSR No. 10142
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10:27:17 1 approved by the Watch Tower Society?

10:27:20 2 A No.

10:27:22 3 MR. TAYLOR: Again, my objection to the
10:27:23 4 form of the question.

10:27:25 5 BY MR. SHAFFER:

10:27:25 6 Q Mr. Lovett do you understand the
10:27:27 7 question?

10:27:27 8 A Uh-huh, yes.

10:27:28 9 Q Are you aware of anybody ever being
10:27:30 10 appointed an elder to a congregation that was not
10:27:34 11 approved by the Watch Tower Society?

10:27:36 12 A I -- I don't know. I'm --

10:27:37 13 Q You don't know whether you're aware of
10:27:38 14 it?

10:27:39 15 A If there is another method, I have no
10:27:42 16 idea.

10:27:42 17 Q Okay. So the only method you're aware of
10:27:45 18 is when the Watch Tower Society approves it?

10:27:48 19 MR. TAYLOR: Again, objection to the form
10:27:49 20 of the question.

10:27:54 21 BY MR. SHAFFER:

10:27:54 22 Q Yes or no?

10:27:57 23 A They've always handled it this way, that's
10:27:59 24 it.

10:28:01 25 Q Okay. All right. You become an elder in

10:28:06 1 1971 in Hardin. Tell me how you learn to do your
10:28:10 2 job as an elder?

10:28:14 3 A From what we see in the publications.

10:28:21 4 Q Let's talk about that for a second. Which
10:28:25 5 publications are we talking about?

10:28:28 6 A Actually anything pertinent, I guess.

10:28:33 7 Q Kingdom ministry school coursebook?

10:28:36 8 A That could be, Uh-huh, yes.

10:28:39 9 Q Okay. And would that be a book that would
10:28:41 10 be at a, like an elder training convention?

10:28:47 11 A Yeah.

10:28:47 12 Q Okay. And who would put on those
10:28:49 13 conventions, those elder training conventions?

10:28:53 14 A The -- we say the branch though we didn't
10:28:55 15 -- the -- yeah, Watch Tower put them on through the
10:29:00 16 branch arrangement.

10:29:02 17 Q In your mind during this period of time
10:29:04 18 was there a difference between the branch and the
10:29:07 19 Watch Tower?

10:29:08 20 A Well in my own mind I just -- we just
10:29:11 21 refer to it in general. We always just -- if they
10:29:14 22 say the Society or whatever.

10:29:17 23 Q They'd say the Society?

10:29:19 24 A Well, we would amongst ourselves. No,
10:29:22 25 they've -- they've approved this recommendation or

10:29:24 1 whatever. We just -- that was pretty common.

10:29:26 2 Q And that's what the literature would say,
10:29:28 3 right, the literature would say with the Society,
10:29:31 4 wouldn't it, the publications?

10:29:33 5 MR. TAYLOR: Again Objection to the
10:29:34 6 form.

10:29:35 7 THE WITNESS: What would -- yeah, what
10:29:37 8 would you have in mind? What were you -- what were
10:29:39 9 you thinking?

10:29:40 10 BY MR. SHAFFER:

10:29:40 11 Q Well, I want to know what you were
10:29:42 12 thinking. How did you come to refer to as the
10:29:44 13 Society? I mean you saw that somewhere, right?

10:29:46 14 A Well, it -- it was printed by them.
10:29:48 15 Whatever it was printed we'd say well, we got that
10:29:52 16 from the Society.

10:29:53 17 Q Okay. And did you understand the Society
10:29:54 18 was different from the branch office?

10:29:57 19 A They are somewhat different in the sense
10:30:03 20 that -- but we -- we just generally referred to it
10:30:05 21 as -- as the Society. We wrote a letter to the
10:30:08 22 Society and it would be to the branch actually. But
10:30:12 23 we just --

10:30:15 24 Q Okay. All right. We were talking about
10:30:16 25 how you learned to do your job as an elder. We

10:30:18 1 talked about the publication. You mentioned
10:30:21 2 publications. I mentioned the Kingdom Ministry
10:30:24 3 coursebook. And then we talked about that would be
10:30:27 4 introduced to the elders at a -- like an elder
10:30:30 5 training convention.

10:30:31 6 A It could be. They did it a number of
10:30:34 7 different ways.

10:30:34 8 Q And as a circuit overseer you've attended
10:30:39 9 and instructed elders at a Kingdom School Ministry
10:30:43 10 course, haven't you?

10:30:44 11 A Yes.

10:30:45 12 Q And that's -- is that a meeting where
10:30:47 13 you'll meet with elders and you'll have literature
10:30:50 14 from the Watch Tower Society with you that you go
10:30:53 15 through kind of on a schedule with the elders to
10:30:56 16 instruct them how to do their job. Is that a fair
10:31:00 17 description?

10:31:01 18 A Well, a lot of that changed over the years
10:31:04 19 too. And I'm trying to think back on the various
10:31:13 20 methods or approaches. But there would be -- our
10:31:18 21 schools we would have that would deal with certain
10:31:23 22 aspects of -- of the arrangement. They didn't --
10:31:28 23 they didn't comprehensively do everything all at
10:31:30 24 once, they just -- and that's where you would learn
10:31:34 25 certain things. But all of those things can be

10:31:37 1 abridge by letters or -- or other publications that
10:31:40 2 might come out later.

10:31:41 3 Q So everything in the Kingdom school
10:31:44 4 ministry course could be abridged by a letter that
10:31:47 5 would come from the Watch Tower Society or other
10:31:50 6 publications; is that fair?

10:31:51 7 A Or some direction, you know, specifically
10:31:53 8 dealing with -- with that subject.

10:31:56 9 Q Okay. Do you know who James Roland is?

10:31:57 10 A Yes.

10:31:58 11 Q He's been deposed. And he said when he
10:32:01 12 was appointed as an elder he went to a training
10:32:05 13 course for elders in Billings.

10:32:08 14 A Uh-huh.

10:32:09 15 Q And he described going through the Kingdom
10:32:10 16 school ministry course.

10:32:12 17 A Uh-huh.

10:32:12 18 Q Does that ring a bell to you having an
10:32:15 19 elder training in Billings at any point in time
10:32:18 20 or?

10:32:18 21 A We never did in -- in Billings.

10:32:21 22 Q Where did you do them? Where did the
10:32:23 23 Hardin congregations elders have their Kingdom
10:32:26 24 school ministry course?

10:32:27 25 A I don't know. I was gone.

10:32:28 1 Q Okay. But in the period of let's say the
10:32:35 2 late 1970s at least through the mid '80s were elders
10:32:41 3 trained at a Kingdom school ministry course with a
10:32:46 4 document called the Kingdom school ministry
10:32:49 5 course?

10:32:51 6 A I don't -- it was pretty much related to a
10:32:59 7 particular subject; whatever it might happen to be.
10:33:02 8 There's -- I mean you could -- you could spend
10:33:05 9 months on -- on some of that.

10:33:06 10 Q But sure. Let's not -- I don't want to
10:33:08 11 get into the particulars of what was being trained
10:33:12 12 and taught or instructed. But just in general as a
10:33:15 13 concept isn't that how elders would learn to do
10:33:18 14 their job in the late 70s to mid 80s, they'd go to a
10:33:21 15 Kingdom school ministry course with publications
10:33:23 16 from the Watch Tower Society?

10:33:24 17 A Most --

10:33:25 18 MR. TAYLOR: Again objection to the form
10:33:26 19 of the question.

10:33:28 20 BY MR. SHAFFER:

10:33:28 21 Q You can answer. It's okay.

10:33:30 22 A Most of the time. What my -- what I was
10:33:35 23 trying to say a minute ago -- what was your
10:33:37 24 question?

10:33:39 25 Q As a general concept late 1970s to the mid

10:33:43 1 '80s, elders would be trained on how to do their job
10:33:47 2 and what the expectations were from the Watch Tower
10:33:50 3 Society by going through the Kingdom Ministry course
10:33:54 4 publication at a -- at a convention or a training;
10:33:57 5 is that right?

10:33:58 6 A We had those schools.

10:34:00 7 Q Okay.

10:34:00 8 A And I'm just saying it from my own
10:34:03 9 standpoint in our last meeting.

10:34:04 10 VIDEOGRAPHER: Let's -- let's look at
10:34:05 11 Document Number 4. This gentleman will help you.
10:34:18 12 Thank you, sir.

10:34:36 13 MR. SHAFFER: All right. Exhibit 4 is the
10:34:37 14 Kingdom school MINISTRY course.

10:34:42 15 (Exhibit 4 marked for identification.)

10:34:42 16 MR. MCCABE: It's actually called the
10:34:44 17 "Kingdom Ministry School Course."

10:34:47 18 BY MR. SHAFFER:

10:34:47 19 Q Kingdom Ministry School. "Compiled and
10:34:50 20 published by the Watch Tower Bible and Tract Society
10:34:53 21 of Pennsylvania, 1972."

10:35:02 22 Have you seen -- no this is just a copy of
10:35:05 23 it. Have you seen this publication in book form
10:35:12 24 before?

10:35:14 25 A I -- I don't recall. They -- there used

10:37:58 1 material, and then the circuit overseer would have
10:38:02 2 discretion how to teach that material at the -- at
10:38:07 3 the school?

10:38:07 4 A Yeah, yes.

10:38:08 5 Q Is that how it was in the 1970s, 1980s?

10:38:13 6 A As best I can remember, yes.

10:38:36 7 Q Do you remember any other documents beside
10:38:39 8 the Kingdom Ministry School course that you would
10:38:42 9 have as a circuit overseer at a -- at an overseer
10:38:49 10 training?

10:38:50 11 A Sometimes there might be letters that have
10:38:52 12 come directly and if it's making a correction or
10:38:56 13 something, and they might get that, that's about all
10:39:00 14 I can think of.

10:39:02 15 Q And are you speaking about this kind of
10:39:04 16 your personal experience as a circuit overseer at
10:39:08 17 this courses?

10:39:09 18 A Uh-huh, yes.

10:39:16 19 Q Okay. I want to see if we're done with
10:39:19 20 Document 2. Give me a second. I'm going to look at
10:39:22 21 Document 2 and see if we're done with it.

10:40:05 22 Are you familiar with the books that are
10:40:07 23 entitled "To Pay Attention to Yourselves and All The
10:40:10 24 Flock"?

10:40:10 25 A Yes.

10:40:11 1 Q What's that book used for?

10:40:14 2 A More or less the same thing, organization.

10:40:17 3 And I'm thinking about the same. Well have lot of

10:40:21 4 changes in titles.

10:40:23 5 Q Sure. Just in general your recollection

10:40:25 6 you say the same thing. Is it to instruct and help

10:40:31 7 elders understand their obligations to their

10:40:35 8 congregations?

10:40:35 9 A Yes.

10:40:37 10 Q I'm just asking. These documents that I'm

10:40:40 11 personally not familiar with like the Kingdom

10:40:43 12 Ministry School course. The Pay attention to

10:40:46 13 Yourself and all the Flock. The branch Organization

10:40:51 14 Manual. Organized to accomplish our Religion.

10:40:53 15 Those are documents I'm not familiar, so I'm kind of

10:40:56 16 just hoping you can help me understand what those

10:40:58 17 documents are used for. Does that make sense?

10:41:02 18 A No, I understand what you're asking.

10:41:02 19 Yeah, the one that referred to at the beginning,

10:41:06 20 none of us elders know anything about that, that's

10:41:09 21 just internally with the -- the branch or

10:41:17 22 organization, and usually a small part of that.

10:41:21 23 Q Okay. That's the one you were confused on

10:41:23 24 Exhibit 2?

10:41:24 25 A Yes.

10:52:07 1 Q Skip one. Let's go to 28734. Thank you.

10:52:21 2 Thank you. I want to point your
10:52:22 3 attention, Mr. Lovett, to this paragraph here
10:52:24 4 starting with general information.

10:52:27 5 A Uh-huh.

10:52:28 6 Q "General information is here published
10:52:30 7 concerning the duties of elders and ministerial
10:52:34 8 servants. Judicial procedures and various features
10:52:37 9 of congregation organization."

10:52:39 10 Is that consistent with how you understood
10:52:42 11 this document that it was for the purpose of
10:52:47 12 communicating the duties of elders and ministerial
10:52:51 13 servants?

10:52:53 14 MR. MCCABE: Among other things.

10:52:54 15 BY MR. SHAFFER:

10:52:54 16 Q Among other things. Is that how
10:52:56 17 understand it?

10:52:58 18 A Uh-huh.

10:52:59 19 Q That's a yes?

10:53:00 20 A Yes.

10:53:01 21 Q Thank you.

10:53:25 22 We've talked about a few other
10:53:25 23 publications. If you talked about letters, would
10:53:27 24 that be like an all body as an elder letter?

10:53:31 25 A It could be.

10:53:32 1 Q And that could have instruction to elders
10:53:35 2 on how to perform their duties?

10:53:36 3 A Yes.

10:53:37 4 Q Okay. Awake magazines?

10:53:43 5 A Not so much.

10:53:44 6 Q What was the purpose of the Awake
10:53:47 7 magazine?

10:53:48 8 A Generally distributed to the public and --
10:53:50 9 but it didn't generally use -- deal with the -- how
10:53:54 10 to organize this or that.

10:53:57 11 Q Okay. How about the our Kingdom service
10:54:01 12 newsletters?

10:54:02 13 A They were used for the weekly service
10:54:08 14 meetings part.

10:54:09 15 Q Okay. How about the Watch Tower
10:54:13 16 magazine?

10:54:15 17 A What would you want to know.

10:54:18 18 Q What was the purpose of the Watch Tower
10:54:20 19 magazine. Did it --

10:54:21 20 Go ahead.

10:54:22 21 A Instructed. It instructed you know.

10:54:25 22 But --

10:54:27 23 Q Instructed elders?

10:54:29 24 A Yeah. And generally everybody. You know,
10:54:33 25 anybody can get a Watch Tower. And there were any