

Exhibit D

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

TRACY CAEKAERT, and
CAMILLIA MAPLEY,

Case No.
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., et al,

Defendants,

ARIANE ROWLAND, and
JAMIE SCHULZE,

30(b)(6) DEPOSITION
UPON ORAL EXAMINATION
OF WILLIAM HASCH AND
RUSTIN HALEY

Plaintiff,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., et al,

Case No.
CV-20-59-BLG-SPW

Defendants.

BE IT REMEMBERED, that the 30(b)(6) deposition upon oral examination of WILLIAM HASCH and RUSTIN HALEY, appearing at the instance of the Plaintiffs, was taken at the offices of Fisher Court Reporting, 2711 1st Avenue North, Billings, Montana, on, Wednesday, January 10, 2024, beginning at the hour of 9:09 a.m., pursuant to the Federal Rules of Civil Procedure, before Barbara J. McLean, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public.

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William Hasch and Rustin Haley 30(b)(6)

1 Q. And when the circuit overseer was visiting
2 the Hardin Congregation, during that period of
3 time, what was the frequency?

4 A. It was every -- it was twice a year.

5 Q. And how was that determined? Was that --

6 A. By available schedule.

7 Q. And what I mean is the twice a year, how
8 does that -- how do you know that it was twice a
9 year? Is there some calendar?

10 A. No. It's just been that way as long as
11 I've been an Elder.

12 Q. And any indication that it was different
13 in -- from '73 to '92 in Hardin?

14 A. No.

15 Q. How did you learn to do your -- perform
16 your duties as an Elder? How did you learn that?

17 A. Observation.

18 Q. Anything else?

19 A. Working with other Elders. Occasionally
20 the branch would have a one-day class or a five-day
21 class on how to lovingly take care of the
22 congregation. And those were referred to as
23 theocratic schools.

24 Q. Did you attend those?

25 A. Yes.

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1 Q. How often are those put on?

2 A. There's really no schedule for them
3 necessarily. I think -- I don't know. I've
4 probably been to maybe under ten of those schools.

5 Q. In the whole time you've been an Elder?

6 A. Yeah.

7 Q. And how about documents? Would you refer
8 to documents?

9 A. It was all based on the Bible.

10 Q. And --

11 A. So Bible principles. A subject would be
12 presented and we'd follow along and discuss it.

13 Q. No documents other than the Bible that you
14 referred to as an Elder?

15 A. There are principles displayed -- there
16 are some guidelines --

17 Q. When you I say a document, I don't -- the
18 document could have anything. It could have
19 guidelines or rules or suggestions?

20 A. Yeah, there was -- the original book was
21 called "Organized to do Jehovah's Will," and that
22 explained just basic procedures, what the
23 secretary's job was, what the overseer's jobs were,
24 what the ministerial servants would do, what the
25 pioneers would do, and just based upon Bible

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1 principles and guidelines.

2 Q. If you look at [Exhibit 19](#), page 4, go to
3 number 11 at the bottom of the page. I'm going to
4 read this. "Each document or other information
5 that the Hardin Congregation elders or leaders
6 referenced for direction on how to perform their
7 duties."

8 A. Which page was that again?

9 Q. It's page 4 at the bottom.

10 A. Page 4. Okay.

11 Q. Number 11. And so this question is tied
12 to our time period, and you're testifying on behalf
13 of the Hardin Congregation, so "Each document or
14 other information that the Hardin Congregation
15 elders or leaders referenced for direction on how
16 to perform their duties."

17 Can you give me that list?

18 A. That would be the organization to do
19 Jehovah's will.

20 Q. Anything else?

21 A. There might have been an Elder directional
22 guidebook, but I don't know.

23 Q. Anything else?

24 A. We would receive letters from the branch
25 on guidance, directional, how to handle things. I

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1 believe you have one of those in copy. But it
2 would either be put down in a writing in a letter
3 form or in one of those books or a basic Bible
4 principle.

5 Q. And so can you identify any other
6 documents other than those in response to the topic
7 number 11?

8 A. No.

9 Q. Can you tell me, Mr. Hasch, what did you
10 do to prepare for specifically number 11? What did
11 you review and whom did you speak with?

12 A. Well, we did -- I know the organization
13 book was there in the -- at that time, so I know
14 that was there --

15 Q. How do you know that?

16 A. Because it was printed before that time
17 period. And it's available to anybody who's
18 baptized.

19 Q. All right.

20 A. So --

21 Q. Anything else?

22 A. There wasn't anything in the file on
23 letters for that --

24 Q. And did you --

25 A. -- other than what we gave you.

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1 no.

2 Q. Just number 11?

3 A. No. Because Tom wouldn't have been an
4 Elder at that period, so why speak to him.

5 Q. Okay. Let's go to number 12 here, kind of
6 along the same lines. This question, Mr. Hasch,
7 which you've been designated as the person most
8 knowledgeable to testify on behalf of Hardin
9 Congregation, is "How the Elders or leaders of the
10 Hardin Congregation were notified of, and trained
11 to perform, their respective duties, including all
12 trainings that were held, the locations of such
13 trainings, who was present..."

14 So let's go through and see if we can
15 answer those first questions.

16 A. Okay.

17 Q. And this is for our time period 1973 to
18 '92. So that first part, how were the Elders and
19 the leaders of the Hardin Congregation notified of
20 and trained to perform their duties?

21 A. It would be through other Elders. So they
22 would learn from the Elders in front of them. The
23 organization book that we mentioned would describe
24 some of their duties, and at those theocratic
25 schools, they would learn.

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