

Exhibit E

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,

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

VIDEO-RECORDED
DEPOSITION UPON ORAL
EXAMINATION OF DELBERT
HIEBERT

Cross Claimants,

vs.

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and
JAMIE SCHULZE,

Plaintiffs,

Cause No.
CV 20-59-BLG-SPW

vs.

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

Defendants.

Delbert Hiebert

1 direction in helping the judicial committee do
2 that?

3 A. Well, there are Elder schools where we're
4 helped to determine, for instance, whether --
5 whether the wrongdoer is repentant, which might --
6 it can change things. In certain cases, it can
7 change to whether a person is disfellowshipped or
8 whether he is reprovved before the congregation
9 where an announcement has been made that so-and-so
10 has been reprovved so that anybody who knew of this
11 wrongdoer would know that he's been dealt with.

12 Q. And when you say that there are Elder
13 schools, did you attend one?

14 A. Uh-huh. Several.

15 Q. And tell me, if you would, what were you
16 told or taught about how to determine whether or
17 not someone was repentant or truthful in their
18 repentance?

19 A. Had they stopped, or were they still doing
20 it. That's the main factor there. Have they made
21 apologies, if that was necessary, to the one that
22 they had done wrong to. Was there signs that they
23 really truly were repentant over what they'd done.
24 If there was no signs, then of course that
25 determines the outcome too, you know.

Delbert Hiebert

1 Q. Anything else that you were taught in the
2 Elder schools about judicial committees?

3 A. Well, the one real factor that is if
4 there's any inclination that there is something
5 illegal, that -- call the branch's legal department
6 immediately. Don't go push ahead on your own
7 without -- without direction from legal.

8 Q. Any of the Elder schools that you went to,
9 did you learn how to speak with victims of a crime
10 or alleged victims of a crime?

11 A. How to speak to them. I guess I really
12 don't -- I don't recall. You know, they're -- yes,
13 I remember one. There was a video. It was kind of
14 like a reenactment type of thing, a scenario. This
15 and thus happened, and so how would you respond to
16 that. You know, like -- do you want to hear a for
17 instance?

18 Q. Please, yeah, if you can give me the
19 example. And when -- do you know approximately
20 when the video that you're talking about, when you
21 saw it and when it was made?

22 A. It's been since I was an Elder in the
23 early 2000's. It was in Billings here at the
24 Billings Heights Kingdom Hall.

25 And there was a video showing where, for