

Exhibit 2

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.,
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY, SR.,

VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION
OF JAMES ROWLAND

Defendants.

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

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and
JAMIE SCHULZE,

Cause No.
CV 20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., and
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA,

Defendants.

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1 BE IT REMEMBERED, that the videotaped
2 deposition upon oral examination of JAMES ROWLAND,
3 appearing at the instance of the Plaintiffs, was
4 taken at the offices of Fisher Court Reporting,
5 2711 1st Avenue North, Billings, Montana, on
6 Friday, April 23, 2021, beginning at the hour of
7 9:17 a.m., pursuant to the Federal Rules of Civil
8 Procedure, before Barbara J. Batts, Registered
9 Merit Reporter, Certified Realtime Reporter, and
10 Notary Public.

11 * * * * *

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13 ATTORNEYS APPEARING ON BEHALF OF THE PLAINTIFF:

14 RYAN R. SHAFFER
15 ROBERT L. STEPANS (appearing via Zoom)
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21
22 ATTORNEYS APPEARING VIA ZOOM ON BEHALF OF THE
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James Rowland

1 I'm going to hand you another, this is a
2 thicker one. It's basically a photocopy of a book.
3 And the cover's going to be the --

4 A. The organization book.

5 Q. -- "Organization for Kingdom-Preaching and
6 Disciple-Making."

7 A. Yeah, that was a book we often referred
8 to.

9 Q. Okay. Let me hand this to you then. So
10 this is -- first of all, this is
11 Caekaert/Mapley 2834, all the way through 3027.
12 And it's titled "The Organization for
13 Kingdom-Preaching and Disciple-Making."

14 I'll hand this to you, Mr. Rowland. Let
15 me know if you've ever seen a copy of that book
16 before.

17 A. Oh, yeah.

18 Q. Did you see it at the Kingdom Hall in
19 Hardin?

20 A. Yes. You'd find one in every book bag, I
21 think, in the organization of brothers.

22 Q. It was in every book bag?

23 A. Yeah, it was referred to many times.

24 Q. What would you refer to this book for?

25 A. For actually improving your ministry and 168

James Rowland

1 how you fit into the organization and the stream of
2 responsibilities.

3 Q. Stream of responsibilities between
4 New York and the local congregation, or between
5 elders and ministerial servants? What do you mean?

6 A. Usually the organization is the one that
7 you're in. When you talk about the organization,
8 nobody talks about New York.

9 Q. Okay. Just the local congregation.

10 A. Yeah, local congregation.

11 Q. Let's mark this as 3.

12 A. That's the organization.

13 (Deposition Exhibit No. 3 was marked for
14 identification.)

15 BY MR. SHAFFER:

16 Q. Is this book here that's been marked as
17 Exhibit 3, is this something that you would refer
18 to as an elder pretty consistently?

19 A. Yeah, either teaching in the congregation
20 or making sure you're helping people to understand
21 the ministry and how to do it, you know.

22 Q. Would you consider it an important book in
23 helping you do your job as an elder?

24 A. Yeah.

25 Q. Okay.