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Attorneys for Defendant Watch Tower Bible and Tract Society of Pennsylvania

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

TRACY CAEKAERT and CAMILLIA
MAPLEY,

Plaintiffs,

-VS-

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

Defendants.

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

Case No. CV-20-00052-SPW-
TJC

**THIRD AFFIDAVIT OF
PHILIP BRUMLEY**

EXHIBIT

3

tabbles

-vs-

BRUCE MAPLEY SR.,

Cross-Defendant.

STATE OF NEW YORK)
 :SS
County of Putnam)

I, Philip Brumley, first being duly sworn, hereby depose and state:

1. I am General Counsel for defendant Watch Tower Bible and Tract Society of Pennsylvania. (“WTPA”).

2. In this role, I have direct knowledge of the information contained in this Affidavit.

3. I am not and have never been a paid employee of WTPA.

4. I am not counsel of record in this case and I am not admitted to practice in the State of Montana.

5. My prior two affidavits were submitted in my capacity as a corporate representative for WTPA rather than as an attorney of record.

6. I began my practice of law in the State of New York in 1988. I have never been sanctioned by any court.

7. I am a minister and a member of a religious order serving full-time under a vow of poverty. This has been my way of life for over 35 years.

8. Like all members of the religious order, I receive housing, food, health

care, and a monthly allowance for personal expenses.

9. My title as General Counsel for WTPA has no financial benefits.

10. I lead my local congregation in worship every Sunday.

11. I have personally officiated at baptisms, weddings and funerals.

12. I have reviewed the documents relied upon in this Court's Order dated August 23, 2022 (Doc. 135), granting in part and denying in part Plaintiffs' Motion for Sanctions.

13. Doc. 21-3 is a personal letter, outside of the relevant time frame, from the now-deceased President of WTPA discussing an internal personnel matter addressed to a person located in New York.

14. Doc. 21-4 is a letter from the Office of Public Information, outside of the relevant time frame, responding to an interview request from BBC Panorama about Jehovah's Witnesses generally, not WTPA.

15. Doc. 29-1 is a letter dated March 4, 1997, outside the relevant time frame, sent to an Australian entity. Not only was this document not circulated in Montana, it was not circulated in the United States.

16. Doc. 29-2 is a letter dated May 15, 1987, sent to a British entity. Not only was this document not circulated in Montana, it was not circulated in the United States.

17. Doc. 29-3 is a letter dated January 2, 1995, outside of the relevant time

frame, and relates to applications for Gilead School. Nothing about this document is connected to the subject matter of this case nor does it support any connection with Montana.

18. Doc. 29-4 is a letter dated November 1, 1995, outside of the relevant time frame, addressed to “ALL BODIES OF ELDERS IN BRITAIN.” As with docs. 29-1 and 29-2, doc. 29-4 has nothing to do with the United States, much less Montana.

19. Doc. 117-1 is an affidavit filed by a corporate officer of Watchtower Bible and Tract Society of New York, Inc. (WTNY), in 1986. WTNY is a separate and distinct legal entity from WTPA. Mr. Adams was not authorized to speak on behalf of, and had no authority to bind, WTPA. The affidavit was filed in the state of Texas, not Montana.

FURTHER THIS AFFIANT SAYETH NAUGHT.

DATED this 24th day of October, 2022.

By: 
Philip Brumley, Esq.

SUBSCRIBED and SWORN to before me by Philip Brumley, Esq., this
24th day of October, 2022.

By: 
Notary Public for the State of New York

JUAN J. O'NEILL
Notary Public, State of New York
No. 01ON6337957
Qualified in Orange County
My Commission Expires February 29, 2024