

EXHIBIT A

EXCERPTS OF DEPOSITION OF CAMILLIA MAPLEY



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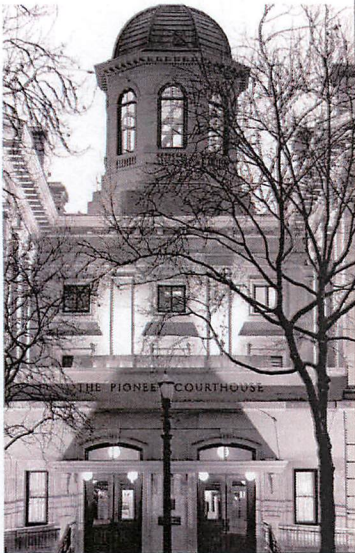
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

TRACY CAEKAERT, and CAMILLIA MAPLEY,

Plaintiffs,

v.

Cause No. CV 20-52-BLG-SPW

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.

Cross-Claimant,

v.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

REMOTE VIDEOTAPED DEPOSITION OF

CAMILLIA MAPLEY

TAKEN ON

AEDT: WEDNESDAY, NOVEMBER 30, 2022; 5:12 A.M.

MST: TUESDAY, NOVEMBER 29, 2022; 11:12 A.M.

WORKSPACES - LEVEL 5
171 COLLINS STREET
MELBOURNE, 3000 AUSTRALIA

<p style="text-align: right;">58</p> <p>1 Q. And what was discussed?</p> <p>2 A. That he was sexually abusing, and that he</p> <p>3 was really sorry and he was crying and said he would</p> <p>4 never do it again.</p> <p>5 Q. And I don't know if we need to know the</p> <p>6 details, but did he elaborate during that meeting on</p> <p>7 what the sexual abuse consisted of?</p> <p>8 A. I don't recall. I just remember him</p> <p>9 crying.</p> <p>10 Q. Were there any other times that he sat you</p> <p>11 down and spoke about this?</p> <p>12 A. Not that I recall.</p> <p>13 Q. Are you aware of anybody else that Bruce</p> <p>14 told this to?</p> <p>15 A. No.</p> <p>16 Q. You referenced this sit-down meeting</p> <p>17 occurring after Gunner was found out. What did you</p> <p>18 mean by that?</p> <p>19 A. From my understanding as a nine- or ten-</p> <p>20 year-old child, Gunner told Bruce, I believe, that</p> <p>21 he sexually abused Tracy.</p> <p>22 Q. Did Gunner ever tell you that?</p> <p>23 A. No.</p> <p>24 Q. I understand that you're alleging in this</p> <p>25 lawsuit that Gunner also sexually assaulted you, do</p>	<p style="text-align: right;">60</p> <p>1 A. No. I don't recall.</p> <p>2 Q. Do you know if Bruce was ever disciplined</p> <p>3 by the Jehovah's Witness church?</p> <p>4 A. I believe so.</p> <p>5 Q. What discipline did he incur?</p> <p>6 A. I don't know.</p> <p>7 Q. Was Bruce ever dis-fellowshipped from the</p> <p>8 Hardin Congregation, do you know?</p> <p>9 A. I don't think so.</p> <p>10 Q. Is Bruce Senior currently a Jehovah's</p> <p>11 Witness?</p> <p>12 A. I don't know. I think so, but I don't</p> <p>13 know.</p> <p>14 Q. Did you ever inform anybody at WTPA or</p> <p>15 WTNY Bruce's sexual abuse of you?</p> <p>16 A. No.</p> <p>17 Q. Did you ever inform anybody at the Hardin</p> <p>18 Congregation?</p> <p>19 A. No.</p> <p>20 Q. And did you ever inform law enforcement?</p> <p>21 A. No.</p> <p>22 Q. You have recently dismissed your claims</p> <p>23 against Bruce Senior, do I have that right?</p> <p>24 MR. SHAFFER: Object to form. Her lawyers</p> <p>25 did that. That's correct. That's what the record</p>
<p style="text-align: right;">59</p> <p>1 I have that right?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know if Gunner ever told Bruce</p> <p>4 Senior that he was sexually abusing you?</p> <p>5 A. Don't know.</p> <p>6 Q. Other than this one meeting in the late</p> <p>7 '70s, did you ever speak about this with Bruce</p> <p>8 Senior?</p> <p>9 MR. SHAFFER: Object to form.</p> <p>10 BY MR. SWEENEY:</p> <p>11 A. Yes, when I told Anne-Marie my cousin.</p> <p>12 Q. When was that?</p> <p>13 A. When they came to visit, '85? Summer of</p> <p>14 '85?</p> <p>15 Q. What was that discussion like? Was it a</p> <p>16 discussion with you, your cousin and Bruce, or what</p> <p>17 happened?</p> <p>18 A. No, it was a discussion between my cousin,</p> <p>19 excuse me, my cousin and I.</p> <p>20 Q. I'll back up to my question then. I</p> <p>21 probably asked it in a confusing way.</p> <p>22 Other than discussing this in the late</p> <p>23 '70s with Bruce and the rest of your immediate</p> <p>24 family when Bruce cried, have you ever discussed</p> <p>25 your allegations of sexual abuse with Bruce Senior?</p>	<p style="text-align: right;">61</p> <p>1 will reflect.</p> <p>2 BY MR. SWEENEY:</p> <p>3 Q. Cami, are you aware of that?</p> <p>4 A. Yes.</p> <p>5 Q. Can you tell me why?</p> <p>6 A. No, I don't know.</p> <p>7 Q. And you don't –</p> <p>8 A. That's for – I'm not the legal team.</p> <p>9 Q. Why did you sue Bruce Senior in the first</p> <p>10 place?</p> <p>11 MR. SHAFFER: Object to form. Cami hired</p> <p>12 lawyers to take what happened to her, what she</p> <p>13 recited happened to her and put that into legal</p> <p>14 papers and filed them on her behalf, so if you're</p> <p>15 asking her for the strategic reasoning behind her</p> <p>16 lawyers' decisions, I think that's an improper</p> <p>17 question.</p> <p>18 MR. SWEENEY: I think your comments are</p> <p>19 improper, Ryan. My question is direct. She sued</p> <p>20 Bruce Mapley Senior. I'm asking her why.</p> <p>21 MR. SHAFFER: Same objection.</p> <p>22 BY MR. SWEENEY:</p> <p>23 Q. You can answer, Cami.</p> <p>24 A. Because he sexually abused me.</p> <p>25 Q. Then why have you now dismissed your</p>

<p style="text-align: right;">62</p> <p>1 claims against Bruce Senior?</p> <p>2 MR. SHAFFER: Same objection.</p> <p>3 BY MR. SWEENEY:</p> <p>4 A. And my answer is, is that's the lawyers'</p> <p>5 decision.</p> <p>6 Q. Did you reach a settlement with Bruce</p> <p>7 Senior?</p> <p>8 A. I have no contact with the man.</p> <p>9 Q. I appreciate that, but do you know if you</p> <p>10 have entered into a settlement agreement with Bruce</p> <p>11 Senior?</p> <p>12 A. If I have no contact, I have no contact.</p> <p>13 How can I settle an agreement with him?</p> <p>14 Q. Do you know if you have released him from</p> <p>15 being liable for the allegations in your complaint?</p> <p>16 A. I have no idea.</p> <p>17 Q. And I think you're testifying that you</p> <p>18 don't know if you entered into a written settlement</p> <p>19 agreement with Bruce Senior, is that accurate?</p> <p>20 MR. SHAFFER: Object to form. She said --</p> <p>21 BY MR. SWEENEY:</p> <p>22 A. I never said I --</p> <p>23 Q. All right.</p> <p>24 A. I never said I didn't know.</p> <p>25 MR. SHAFFER: Misstates her testimony.</p>	<p style="text-align: right;">64</p> <p>1 dismissed Bruce. I'm going to ask her why.</p> <p>2 If the answer is she doesn't know, she can</p> <p>3 tell me that, but I don't think she gets to hide</p> <p>4 behind attorney/client privilege for why she named</p> <p>5 somebody as a defendant or why she dismissed them.</p> <p>6 MR. SHAFFER: Her testimony has been</p> <p>7 clear. She left that to her lawyers to decide. Her</p> <p>8 lawyers decided it. You're asking her now to get</p> <p>9 into what her lawyers told her as about why her</p> <p>10 lawyers dismissed Bruce Mapley, I believe that's</p> <p>11 getting into attorney/client privilege</p> <p>12 communication. I'm not going to let her answer it.</p> <p>13 BY MR. SWEENEY:</p> <p>14 Q. Cami, do you think Bruce Senior should</p> <p>15 still be a defendant in this lawsuit?</p> <p>16 A. Well, his name's still on it, so isn't he?</p> <p>17 Q. He has been dismissed by order of court,</p> <p>18 so inaccurately his name was represented as being in</p> <p>19 the caption, but the claims have been dismissed, to</p> <p>20 clear that up for you.</p> <p>21 A. Well, I think the truth should come out,</p> <p>22 and that's what our goal is here, isn't it?</p> <p>23 Q. And I appreciate that, but my question is:</p> <p>24 Do you think Bruce Senior should still be a</p> <p>25 defendant in this lawsuit?</p>
<p style="text-align: right;">63</p> <p>1 BY MR. SWEENEY:</p> <p>2 Q. I'll ask you then, have you entered into a</p> <p>3 written settlement agreement with Bruce Senior?</p> <p>4 A. No.</p> <p>5 Q. Is your testimony today that you have no</p> <p>6 idea why he has been dismissed from this lawsuit?</p> <p>7 MR. SHAFFER: Asked and answered.</p> <p>8 BY MR. SWEENEY:</p> <p>9 A. Once again, that is for my lawyers to make</p> <p>10 decision about what's happening.</p> <p>11 Q. And I appreciate that, Cami. I'm asking</p> <p>12 about your personal knowledge. Do you know why he</p> <p>13 was dismissed from this lawsuit?</p> <p>14 MR. SHAFFER: Cami, don't answer that.</p> <p>15 You and I have talked about that. He's not allowed</p> <p>16 to ask you that question.</p> <p>17 MR. SWEENEY: Well, Ryan, she doesn't get</p> <p>18 to insulate testimony simply by bringing it up with</p> <p>19 you. If she knows why a person she'd sue has been</p> <p>20 dismissed, she has to tell me that.</p> <p>21 MR. SHAFFER: If she knows why her lawyers</p> <p>22 dismissed Bruce Mapley, she has to tell you that? I</p> <p>23 disagree. Cami, don't answer the question.</p> <p>24 MR. SWEENEY: Well, Ryan, this is not your</p> <p>25 lawsuit. This is hers. She sued Bruce. She</p>	<p style="text-align: right;">65</p> <p>1 A. Don't know.</p> <p>2 Q. How did you know Gunner Haines?</p> <p>3 A. He was in the congregation.</p> <p>4 Q. When did Gunner pass away?</p> <p>5 MR. SHAFFER: Object to form.</p> <p>6 MR. SWEENEY: Let's clear that up, Ryan,</p> <p>7 just so the record's clear. What exactly is your</p> <p>8 objection?</p> <p>9 MR. SHAFFER: Foundation. Speculation.</p> <p>10 If you really want to find that information, it's in</p> <p>11 the newspaper. I don't think it's a proper question</p> <p>12 for this witness.</p> <p>13 BY MR. SWEENEY:</p> <p>14 Q. Cami, do you know when Gunner passed away?</p> <p>15 A. No.</p> <p>16 Q. Has it been more than ten --</p> <p>17 A. I have a general idea, but --</p> <p>18 Q. What is your general idea?</p> <p>19 A. I don't know, Bruce Junior told me. I</p> <p>20 don't know how long ago that was.</p> <p>21 Q. What years do you claim Gunner abused you?</p> <p>22 A. '77? '78?</p> <p>23 Q. How many times did Gunner Haines abuse</p> <p>24 you?</p> <p>25 A. Once.</p>

CERTIFICATE

I, Megan Ramirez, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS WHEREOF, I have hereunto set my hand this 14th day of December, 2022.

A handwritten signature in black ink, appearing to read 'Megan Ramirez', is written over a horizontal line.

Megan Ramirez