

Exhibit I

1. I am an attorney, licensed in the State of New York since 1988.
2. I serve as General Counsel to Watchtower Bible and Tract Society of New York, Inc. (“Watchtower”), a position I have held since my licensure in 1988.
3. As General Counsel, I am the overseer of Watchtower’s Legal Department.
4. During all of the time I have been General Counsel, part of the work of the Legal Department has been to provide legal advice and opinions to various departments that make up the United States Branch of Jehovah’s Witnesses.
5. The Service Department is one of the departments to which the Legal Department provides legal advice. The Service Department is one of the Legal Department’s and my clients.

6. In 2000, the Service Department was overseen by a committee of elders who together constituted the "Service Department Committee." Similarly, the Legal Department was overseen by several attorneys who together made up the "Legal Department Committee."

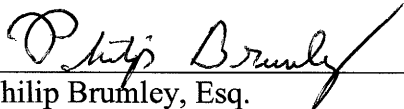
7. Before, during and after 2000, the Legal Department regularly sent the Service Department Committee legal opinions on various topics, including liability.

8. One such letter containing the legal opinions and legal advice that I provided to the Service Department Committee was the legal memorandum LLK:LSU March 31, 2000, marked WT-000143 in this litigation.

9. That letter contains legal opinions and advice.


10. It was the sole purpose of the memorandum marked WT-000143 to convey attorney-client-privileged legal advice to our client.

Further Affiant sayeth not.


Philip Brumley, Esq.

Subscribed and sworn to before me by Philip Brumley, known to me to be the person whose signature appears above, on this, the 20th day of March, 2015.

STATE OF NEW YORK)
COUNTY OF PUTNAM)


Notary Public, State of New York
My commission expires: 05/01/15

DONNA S. REIMER
Notary Public, State of New York
No. 4950436
Qualified in Putnam County
Commission Expires 05/01/15