Exhibit I

DALLAS COUNTY
3/20/2015 7:43:18 AM
FELICIA PITRE
DISTRICT CLERK

CAUSE NO. DC-14-12402

JOHN DOE I, JANE DOE I, JANE DOE II,	§	IN THE DISTRICT COURT
JANE DOE III, JANE DOE IV, AND	§	
JANE DOE V,	§	
,	§	
Plaintiffs,	\$ §	
,	\$ §	
V.	8 §	
••	§ §	
WATCHTOWER BIBLE AND TRACT	8	
SOCIETY OF NEW YORK, INC.	8	
•	§ s	
(and/or d/b/a or a/k/a WATCHTOWER	§	D. 177 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
BIBLE AND TRACT SOCIETY OF	§	DALLAS COUNTY, TEXAS
PENNSYLVANIA, INC.), KINGDOM	§	
HALL JEHOVAH'S WITNESSES	§	
(CENTRAL ENGLISH) OF DALLAS,	§	
TEXAS, KINGDOM HALL	§	
JEHOVAH'S WITNESSES OF	8	
PLANO, TEXAS, KINGDOM HALL	8	
JEHOVAH'S WITNESSES OF	\$ §	
GREENVILLE, TEXAS, AND	\$ §	
REGINALD TYRONE JACKSON,	8	
REGINALD TRONE JACKSON,	8	
D-f 1	8	14TH HUDICIAL DICEDICE
Defendants.	8	14 TH JUDICIAL DISTRICT

AFFIDAVIT OF PHILIP BRUMLEY, ESQ.

PHILIP BRUMLEY, having been duly sworn, on oath deposes and says the following:

- 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 OS for 115