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*Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.*

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

TRACY CAEKAERT, and CAMILLIA	)	Cause No. CV 20-52-BLG-SPW
MAPLEY,	)	
	)	<b>AFFIDAVIT OF MARIO MORENO</b>
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,	)	

I, MARIO MORENO, first being duly sworn, hereby depose and state:

1. I am over 21 years of age, of sound mind, and competent to submit this affidavit.
2. I provide this affidavit in support of the Response to Plaintiffs' Motion to Compel the production of attorney-client privileged documents, filed by Watchtower Bible and Tract Society of New York Inc. ("WTNY").
3. I reside in Patterson, New York, and am an attorney in good standing duly licensed by the State of New York.

4. WTNY is a corporation that is tax exempt under section 501(c)(3) of the Internal Revenue Code and is organized under the Not-for-Profit Corporation Law of the State of New York.

5. Between 1994 and 2016, I served as Associate General Counsel for WTNY in the Legal Department.

6. My responsibilities included providing legal advice, counsel, and representation to WTNY and other legal entities associated with the faith of Jehovah's Witnesses, including local congregations and elders throughout the United States.

7. WTNY supports the religious body of Christians in the United States known as Jehovah's Witnesses by, as examples, it owns real estate to provide housing and office facilities for members of the religious order who serve under vows of poverty and obedience, and it prints religious materials in the United States.

8. The Legal Department supports the faith and provides legal guidance and advice to WTNY and to elders, when operating in their ecclesiastical role as ministers in congregations of Jehovah's Witnesses throughout the United States.

9. WTNY attorneys are in-house counsel not just for WTNY, but for the broader religious community of elders, congregations of Jehovah's Witnesses, and other legal entities used by Jehovah's Witnesses.

10. Elders do not call WTNY Legal Department as private individuals, but in their capacity as ministers.

11. Elders speak as ministers to legal counsel for the faith and with the expectation of confidentiality.

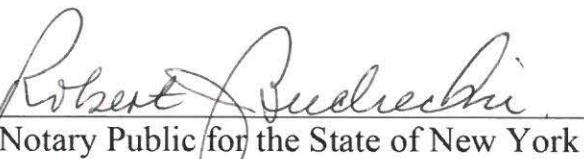
12. WTNY Legal Department attorneys understand that they represent WTNY *and* the elders in their ecclesiastical (clerical) capacity, and that their communications are privileged.

FURTHER THIS AFFIANT SAYETH NAUGHT.

DATED this 1<sup>st</sup> day of February, 2023.

By:   
Mario Moreno

SUBSCRIBED and SWORN to before me by Mario Moreno this 1 day  
of February, 2023.

By:   
Notary Public for the State of New York

ROBERT J. BUDRECKI  
Notary Public, State of New York  
No. 01BU6003185  
Qualified in Putnam County  
Commission Expires 02/23/2022 