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Attorneys for Defendants/Third-Party Plaintiffs Watchtower Bible and Tract Society of New York, Inc., Christian Congregation of Jehovah's Witnesses, and Thompson Falls Congregation of Jehovah's Witnesses

MONTANA TWENTIETH JUDICIAL DISTRICT COURT, SANDERS COUNTY

ALEXIS NUNEZ and HOLLY
McGOWAN,

Plaintiffs,

v.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.;
WATCHTOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA, INC.;
CHRISTIAN CONGREGATION OF
JEHOVAH'S WITNESSES and
THOMPSON FALLS CONGREGATION
OF JEHOVAH'S WITNESSES,

Defendants.

Hon. James A. Manley
Cause No. DV 16-84

DECLARATION OF JOEL M. TAYLOR
IN SUPPORT OF DEFENDANTS'
MOTION TO COMPEL

FILED May 2 20 18
Candace Fisher
SANDERS COUNTY CLERK OF DISTRICT COURT
BY [Signature]
DEPUTY

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.;
CHRISTIAN CONGREGATION OF
JEHOVAH'S WITNESSES and
THOMPSON FALLS CONGREGATION
OF JEHOVAH'S WITNESSES,

Third-Party Plaintiffs,

v.

MAXIMO NAVA REYES, MARCO
NUNEZ, IVY MCGOWAN-
CASTLEBERRY,

Third-Party Defendants.

I, JOEL M. TAYLOR, declare under the penalty of perjury:

1. I am over 21 years of age, of sound mind, and competent to make this declaration.
2. I am an attorney duly licensed to practice law in the states of New York and New Jersey and I have been admitted to practice *pro hac vice* in this case as counsel of record for the Defendants/Third-Party Plaintiffs.
3. I provide this Declaration in support of the Motion to Compel Production of Documents filed by Defendants Watchtower Bible and Tract Society of New York, Inc. ("Watchtower") and Christian Congregation of Jehovah's Witnesses ("CCJW").
4. Plaintiffs seek recovery for emotional distress related to childhood sexual abuse committed by Max Reyes.
5. Plaintiffs' First Amended Complaint alleges claims for "emotional trauma" "mental impairment/disfigurement" "mental anguish" "loss of enjoyment and quality of


life” and “loss of established course of life.” First Am. Compl. 17, Nov. 14, 2016.

6. Both Plaintiffs have refused to produce evidence that is relevant and likely to lead to admissible evidence concerning their emotional health and their “established course of life.”

7. On March 22, 2018, I corresponded with Plaintiffs’ counsel outlining the areas of dispute in an attempt to reach reasonable compromise whenever possible. However, Plaintiffs’ counsel has chosen to rely on the objections as stated in the Motion to Compel.

I declare under penalty of perjury of the laws of the State of Montana that the foregoing is true and correct.

Executed on April 30, 2018 in Patterson, New York.



Joel M. Taylor, Declarant

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2018, a copy of the foregoing document was served on the following persons by the following means:

 Hand Delivery
3-4 Mail
 Overnight Delivery Service
 Fax (include fax number in address)
1-2 E-Mail (include email in address)

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3. **PERSONAL & CONFIDENTIAL**
Maximo Reyes
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4. **COURTESY COPY TO:**
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20th Judicial District Court
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