



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

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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.

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WATCHTOWER BIBLE AND TRACT SOCIETY  
OF NEW YORK, INC.

Cross-Claimant,

v.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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REMOTE VIDEOTAPED DEPOSITION OF

CAMILLIA MAPLEY

TAKEN ON

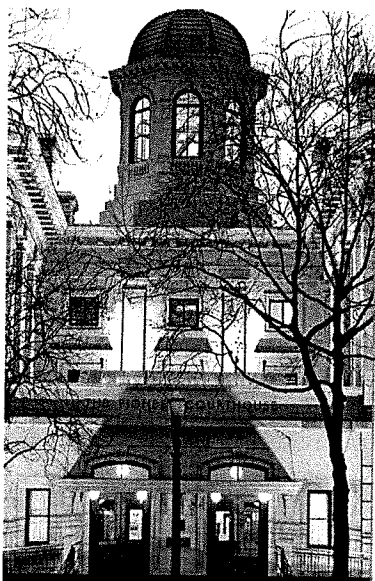
AEDT: WEDNESDAY, NOVEMBER 30, 2022; 5:12 A.M.

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

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1 A. No. I don't recall.

2 Q. Do you know if Bruce was ever disciplined  
3 by the Jehovah's Witness church?

4 A. I believe so.

5 Q. What discipline did he incur?

6 A. I don't know.

7 Q. Was Bruce ever dis-fellowshipped from the  
8 Hardin Congregation, do you know?

9 A. I don't think so.

10 Q. Is Bruce Senior currently a Jehovah's  
11 Witness?

12 A. I don't know. I think so, but I don't  
13 know.

14 Q. Did you ever inform anybody at WTPA or  
15 WTNV Bruce's sexual abuse of you?

16 A. No.

17 Q. Did you ever inform anybody at the Hardin  
18 Congregation?

19 A. No.

20 Q. And did you ever inform law enforcement?

21 A. No.

22 Q. You have recently dismissed your claims  
23 against Bruce Senior, do I have that right?

24 MR. SHAFFER: Object to form. Her lawyers  
25 did that. That's correct. That's what the record

1 will reflect.

2 **BY MR. SWEENEY:**

3 Q. Cami, are you aware of that?

4 A. Yes.

5 Q. Can you tell me why?

6 A. No, I don't know.

7 Q. And you don't --

8 A. That's for -- I'm not the legal team.

9 Q. Why did you sue Bruce Senior in the first  
10 place?

11 **MR. SHAFFER:** Object to form. Cami hired  
12 lawyers to take what happened to her, what she  
13 recited happened to her and put that into legal  
14 papers and filed them on her behalf, so if you're  
15 asking her for the strategic reasoning behind her  
16 lawyers' decisions, I think that's an improper  
17 question.

18 **MR. SWEENEY:** I think your comments are  
19 improper, Ryan. My question is direct. She sued  
20 Bruce Mapley Senior. I'm asking her why.

21 **MR. SHAFFER:** Same objection.

22 **BY MR. SWEENEY:**

23 Q. You can answer, Cami.

24 A. Because he sexually abused me.

25 Q. Then why have you now dismissed your

1 **claims against Bruce Senior?**

2 **MR. SHAFFER:** Same objection.

3 **BY MR. SWEENEY:**

4 A. And my answer is, is that's the lawyers'  
5 decision.

6 **Q. Did you reach a settlement with Bruce**  
7 **Senior?**

8 A. I have no contact with the man.

9 **Q. I appreciate that, but do you know if you**  
10 **have entered into a settlement agreement with Bruce**  
11 **Senior?**

12 A. If I have no contact, I have no contact.  
13 How can I settle an agreement with him?

14 **Q. Do you know if you have released him from**  
15 **being liable for the allegations in your complaint?**

16 A. I have no idea.

17 **Q. And I think you're testifying that you**  
18 **don't know if you entered into a written settlement**  
19 **agreement with Bruce Senior, is that accurate?**

20 **MR. SHAFFER:** Object to form. She said --

21 **BY MR. SWEENEY:**

22 A. I never said I --

23 **Q. All right.**

24 A. I never said I didn't know.

25 **MR. SHAFFER:** Misstates her testimony.

1 BY MR. SWEENEY:

2 Q. I'll ask you then, have you entered into a  
3 written settlement agreement with Bruce Senior?

4 A. No.

5 Q. Is your testimony today that you have no  
6 idea why he has been dismissed from this lawsuit?

7 MR. SHAFFER: Asked and answered.

8 BY MR. SWEENEY:

9 A. Once again, that is for my lawyers to make  
10 decision about what's happening.

11 Q. And I appreciate that, Cami. I'm asking  
12 about your personal knowledge. Do you know why he  
13 was dismissed from this lawsuit?

14 MR. SHAFFER: Cami, don't answer that.  
15 You and I have talked about that. He's not allowed  
16 to ask you that question.

17 MR. SWEENEY: Well, Ryan, she doesn't get  
18 to insulate testimony simply by bringing it up with  
19 you. If she knows why a person she'd sue has been  
20 dismissed, she has to tell me that.

21 MR. SHAFFER: If she knows why her lawyers  
22 dismissed Bruce Mapley, she has to tell you that? I  
23 disagree. Cami, don't answer the question.

24 MR. SWEENEY: Well, Ryan, this is not your  
25 lawsuit. This is hers. She sued Bruce. She

1 dismissed Bruce. I'm going to ask her why.

2 If the answer is she doesn't know, she can  
3 tell me that, but I don't think she gets to hide  
4 behind attorney/client privilege for why she named  
5 somebody as a defendant or why she dismissed them.

6 **MR. SHAFFER:** Her testimony has been  
7 clear. She left that to her lawyers to decide. Her  
8 lawyers decided it. You're asking her now to get  
9 into what her lawyers told her as about why her  
10 lawyers dismissed Bruce Mapley, I believe that's  
11 getting into attorney/client privilege  
12 communication. I'm not going to let her answer it.

13 **BY MR. SWEENEY:**

14 **Q. Cami, do you think Bruce Senior should**  
15 **still be a defendant in this lawsuit?**

16 **A. Well, his name's still on it, so isn't he?**

17 **Q. He has been dismissed by order of court,**  
18 **so inaccurately his name was represented as being in**  
19 **the caption, but the claims have been dismissed, to**  
20 **clear that up for you.**

21 **A. Well, I think the truth should come out,**  
22 **and that's what our goal is here, isn't it?**

23 **Q. And I appreciate that, but my question is:**  
24 **Do you think Bruce Senior should still be a**  
25 **defendant in this lawsuit?**

1 A. Don't know.

2 **Q. How did you know Gunner Haines?**

3 A. He was in the congregation.

4 **Q. When did Gunner pass away?**

5 **MR. SHAFFER:** Object to form.

6 **MR. SWEENEY:** Let's clear that up, Ryan,  
7 just so the record's clear. What exactly is your  
8 objection?

9 **MR. SHAFFER:** Foundation. Speculation.

10 If you really want to find that information, it's in  
11 the newspaper. I don't think it's a proper question  
12 for this witness.

13 **BY MR. SWEENEY:**

14 **Q. Cami, do you know when Gunner passed away?**

15 A. No.

16 **Q. Has it been more than ten --**

17 A. I have a general idea, but --

18 **Q. What is your general idea?**

19 A. I don't know, Bruce Junior told me. I  
20 don't know how long ago that was.

21 **Q. What years do you claim Gunner abused you?**

22 A. '77? '78?

23 **Q. How many times did Gunner Haines abuse**  
24 **you?**

25 A. Once.