Exhibit F

From: Ryan Shaffer <ryan@mss-lawfirm.com>
Sent: Wednesday, April 19, 2023 3:57 PM
To: Jon Wilson <jwilson@brownfirm.com>; Brett Jensen <BJensen@brownfirm.com>; Michael Sarabia
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<matthew@merrillwaterlaw.com>; Katy Gannon <katy@mss-lawfirm.com>
Subject: Deps of Shuster, Breaux, Smalley

Gentlemen,

We would still like to depose Mr. Shuster, Mr. Breaux, and Mr. Smalley. Since your briefs on the matter emphatically
state that you never refused to produce these witnesses for deposition, please let me know if you will now do so.

If not, I would like to schedule a time to confer regarding:
1. How the defendants identify and determine who qualifies as an apex witness;
2. Identification of individuals that you will produce for deposition who have substantially similar personal
   history and personal knowledge (for all time periods at issue in this case) of the JW Organization's
   corporate structure, the policies and procedures in place for handling accusations of child sex abuse,
   how the Service Department communicated with local congregations, and the process for the
   appointment and deletion of elders and ministerial servants; and
3. Any reason that Plaintiffs should not be permitted to depose Mr. Smalley.

I look forward to hearing from you.

Best,

Ryan R. Shaffer

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