

*Exhibit Q*

1 MONTANA TWENTIETH JUDICIAL DISTRICT COURT, SANDERS COUNTY

2 CAUSE NUMBER: DV-16-84

3 ALEX NUNEZ and HOLLY McGOWAN, )

4 Plaintiffs, )

5 vs. )

REPORTER'S TRANSCRIPT  
VOLUME I of III

6 WATCHTOWER BIBLE AND TRACT )

SOCIETY OF NEW YORK, INC.; )

7 WATCHTOWER BIBLE AND TRACT )

SOCIETY OF PENNSYLVANIA, INC.; )

8 CHRISTIAN CONGREGATION OF )

JEHOVAH'S WITNESSES and )

9 THOMPSON FALLS CONGREGATION OF )

JEHOVAH'S WITNESSES, )

10 )

Defendants. )

11 )

12 )

WATCHTOWER BIBLE AND TRACT )

SOCIETY OF NEW YORK, INC.; )

13 CHRISTIAN CONGREGATION OF )

JEHOVAH'S WITNESSES and )

14 THOMPSON FALLS CONGREGATION )

OF JEHOVAH'S WITNESSES, )

15 )

Third-Party Plaintiffs, )

16 )

vs. )

17 )

18 MAXIMO NAVA REYES, MARCO NUNEZ, )

and IVY McGOWAN-CASTLEBERRY, )

19 )

Third-Party Defendants. )

20 )

21 Taken at the Sanders County Courthouse

1111 Main Street

22 Thompson Falls, Montana

Monday, September 24, 2018

23 9:30 a.m.

24

25 Honorable James A. Manley, presiding

1 your house, right?

2 A. Probably have, yes.

3 Q. On more than one occasion, right?

4 A. Probably, yes.

5 Q. You knew her -- you knew her grandparents Max  
6 and Joni, right?

7 A. Yes.

8 Q. And you would have Max and Joni over at your  
9 house?

10 A. We have had them over, yes.

11 Q. When you would see Alexis at church you would  
12 talk to her at church, right?

13 A. I have talked to her, probably "hello" or  
14 something to that effect, yes.

15 Q. We were looking at 2004 and what happened. In  
16 2004 you knew that Lexi was coming to the Thompson Falls  
17 church with her grandparents, right?

18 A. I knew she would show up sometimes, yes.

19 Q. Well, is that different than knowing that you  
20 could actually look out in the congregation and you would  
21 see Max and Joni and Lexi? You could actually see Lexi  
22 attending church with Max and Joni?

23 A. Yes.

24 Q. Okay. Let's talk a little bit about your role  
25 as an Elder. As an Elder is there a set of policies that

1 you are given?

2 A. We have -- we have letters that we receive  
3 from the branch. We have a book that helps us in  
4 carrying out our role as Elders, yes.

5 Q. That book is called Shepherd the Flock?

6 A. Yes, Flock of God.

7 Q. And if you don't follow those policies you  
8 might not be an Elder, right?

9 A. Well, we follow the policies because they're  
10 in line with the Bible. I've never gone against them so.

11 Q. But you know if you go against them you could  
12 be removed from your position as an Elder, right?

13 A. Yes.

14 Q. Now, Thompson Falls in 1998 you -- as a  
15 Thompson Falls Elder you received those policies from  
16 Watchtower, right?

17 A. We -- I really didn't pay attention but  
18 something was on the letterhead of the letters, yes. So  
19 it probably was Watchtower.

20 Q. You get policies and at the top of the  
21 policies it would have a letterhead that would say  
22 "Watchtower New York"?

23 A. Yes.

24 Q. Thank you, sir. Back in '98 -- a train is  
25 trying to go by.