

Exhibit G

1 JACKSON LEWIS LLP
2 Robert J. Schnack (SBN 191987)
3 801 K Street, Suite 2300
4 Sacramento, CA 95814
5 Telephone: (916) 341-0404
6 Facsimile: (916) 341-0141

7 Attorney for Defendant
8 WATCHTOWER BIBLE AND TRACT
9 SOCIETY OF NEW YORK, INC.

10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF ALAMEDA

13 JANE DOE,

14 Plaintiff,

15 vs.

16 THE WATCHTOWER BIBLE AND TRACT
17 SOCIETY OF NEW YORK, INC., a
18 corporation; THE WATCHTOWER BIBLE
19 AND TRACT SOCIETY OF
20 PENNSYLVANIA, a corporation; THE
21 GOVERNING BODY OF JEHOVAH'S
22 WITNESSES, an unincorporated association;
23 JEHOVAH'S WITNESSES ON PERALTA
24 BLVD. FREMONT, an entity; KINGDOM
25 HALL OF JEHOVAH'S WITNESSES, a
26 corporation; JONATHAN KENDRICK, an
27 individual; and ROES 1 to 10,

28 Defendants.

Case No.: HG11558324

**DEFENDANT WATCHTOWER BIBLE
AND TRACT SOCIETY OF NEW YORK,
INC.'S RESPONSES TO PLAINTIFF'S
REQUESTS FOR ADMISSION, SET
THREE**

PROPOUNDING PARTY: Plaintiff JANE DOE

RESPONDING PARTY: Defendant WATCHTOWER BIBLE AND TRACT SOCIETY OF
NEW YORK, INC.

SET NUMBER: THREE (3)

///

///

1 Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter
2 “Defendant”), by and through its undersigned counsel and pursuant California Code of Civil
3 Procedure section 2033, hereby responds to Plaintiff Jane Doe’s (“Plaintiff”) Demand for
4 Inspection of Documents, Things, and/or Places, Set Four, as follows.

5 **RESPONSES TO REQUESTS FOR ADMISSION, SET THREE**

6 **REQUEST FOR ADMISSION NO. 3:**

7 *Do you admit that, during the time he performed services as an Elder at the North*
8 *Congregation, Fremont, between January 1, 1993, and December 31, 1998, Gary*
9 *Abrahamson was acting as an agent of Watchtower Bible and Tract Society of New York,*
10 *Inc.?*

11
12 **RESPONSE NO. 3:**

13 Defendant admits that between January 1, 1993, and December 31, 1998, while Gary
14 Abrahamson was acting within the course and scope of his duties as an elder in the North
15 Congregation, Fremont, California, he was acting as an agent of Watchtower Bible and Tract
16 Society of New York, Inc.; however, Defendant denies that Gary Abrahamson was acting as an
17 agent of Watchtower Bible and Tract Society of New York, Inc., during any and all times that he
18 was not acting within the course and scope of his duties as an elder in the North Congregation,
19 Fremont, California.
20

21
22 **REQUEST FOR ADMISSION NO. 4:**

23 *Do you admit that, during the time he performed services as an Elder at the North*
24 *Congregation, Fremont, between January 1, 1993, and December 31, 1998, Michael Clark*
25 *[sic] was acting as an agent of Watchtower Bible and Tract Society of New York, Inc.?*

26 ///

27 ///

1 **RESPONSE NO. 4:**

2 Defendant admits that between January 1, 1993, and December 31, 1998, while Michael
3 Clarke was acting within the course and scope of his duties as an elder in the North
4 Congregation, Fremont, California, he was acting as an agent of Watchtower Bible and Tract
5 Society of New York, Inc.; however, Defendant denies that Michael Clarke was acting as an
6 agent of Watchtower Bible and Tract Society of New York, Inc., during any and all times that he
7 was not acting within the course and scope of his duties as an elder in the North Congregation,
8 Fremont, California.
9

10 **REQUEST FOR ADMISSION NO. 5:**

11 *Do you admit that, during the time he performed services as an Elder at the North*
12 *Congregation, Fremont, between January 1, 1993, and December 31, 1998, Larry Lamberdin*
13 *[sic] was acting as an agent of Watchtower Bible and Tract Society of New York, Inc.?*
14

15 **RESPONSE NO. 5:**

16 Defendant admits that between January 1, 1993, and December 31, 1998, while Larry
17 Lamerdin was acting within the course and scope of his duties as an elder in the North
18 Congregation, Fremont, California, he was acting as an agent of Watchtower Bible and Tract
19 Society of New York, Inc.; however, Defendant denies that Larry Lamerdin was acting as an
20 agent of Watchtower Bible and Tract Society of New York, Inc., during any time that he was not
21 acting within the course and scope of his duties as an elder in the North Congregation, Fremont,
22 California.
23

24 DATED: December 8, 2011

JACKSON LEWIS LLP

25 By 
26 Robert J. Schnack

27 Attorneys for Defendant
28 WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.

**JANE DOE v. THE WATCHTOWER BIBLE
AND TRACT SOCIETY OF NEW YORK, INC., et al.
Alameda Superior Court Case No. HG11558324**

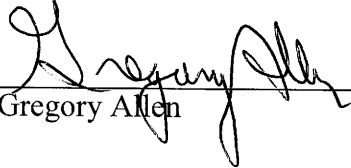
VERIFICATION

I am a duly authorized representative of Defendant Watchtower Bible and Tract Society of New York, Inc. in the above-entitled action.

I have read the foregoing **DEFENDANT WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.' S RESPONSES TO PLAINTIFF'S REQUEST FOR ADMISSIONS, SET THREE** to which this verification is attached. As to factual statements set forth therein for which I have personal knowledge, I declare that such statements are true and correct to the best of my knowledge. To the extent that factual statements contained therein represent composites of knowledge of various other persons, including or not including myself, I believe that such statements are true and correct.

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

Executed this 9 day of December, 2011, at Patterson, New York.



Gregory Allen

IRWIN M. ZALKIN, ESQ. (#89957)
DEVIN M. STOREY, ESQ. (#234271)
MICHAEL J. KINSLOW, ESQ. (#238310)
The Zalkin Law Firm, P.C.
12555 High Bluff Drive, Suite 260
San Diego, CA 92130
Tel: 858-259-3011
Fax: 858-259-3015
Email: Irwin@zalkin.com
dms@zalkin.com
mjpk@zalkin.com

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

Jose Lopez, Individually,

Plaintiff,

v.

Defendant Doe 1, Linda Vista Church, and
Defendant Doe 2, Supervisory
Organization, Defendant Doe 3,
Perpetrator, and Does 4 through 100,
inclusive,

Defendants.

) Case No: 37-2012-0099849-CU-PO-
) CTL
)

) **STIPULATION RE FOUNDATION
) OF DOCUMENTS AND AGENCY
) OF INDIVIDUALS IN SPECIFIED
) POSITIONS**

) **Dept: C-65
) Judge: Joan M. Lewis
) Trial: None Set**

Plaintiff Jose Lopez (hereinafter Plaintiff) and Defendant Linda Vista Spanish
Congregation of Jehovah’s Witnesses, San Diego, California, and Defendant Watchtower Bible
and Tract Society of New York, Inc. (hereinafter “the Church Defendants”), by and through
their respective counsel of record, hereby stipulate to the foundation and business record status
of documents produced by the parties in discovery and the agency status of individuals holding
the positions of Elder or Ministerial Servant.

1 Plaintiff and the Church Defendants further agree and stipulate that the stipulations
2 agreed to herein shall be maintained in confidence and shall be used for the sole and exclusive
3 purposes of preparing this action for motions, hearings, trial or appeal, and shall not be
4 disclosed to any person or entity for any purpose unrelated to the prosecution of the present
5 litigation. The agreements reached herein are not intended to be used, and are specifically
6 intended to be of no effect in any other action.

7
8 STIPULATED AGREEMENT

9 WHEREAS, Plaintiff Jose Lopez has commenced an action alleging sexual abuse at the
10 hands of Gonzalo Campos while Campos was one of Jehovah's Witnesses, wherein Plaintiff has
11 commenced this action against Defendant Linda Vista Spanish Congregation of Jehovah's
12 Witnesses, Defendant Watchtower Bible and Tract Society of New York, Inc., and Defendant
13 Gonzalo Campos. Defendant Gonzalo Campos is not a signatory to this Stipulation;

14 WHEREAS, all parties to this stipulation have engaged in the discovery process, and
15 either have produced documents in response to requests for production of documents or by
16 agreement will be producing documents in response to requests for production of documents,
17 and the parties to this stipulation seek to streamline the process of establishing the foundation of
18 such documents, including their authenticity and business record status;

19
20 WHEREAS, Gonzalo Campos was associated with Defendant Linda Vista Spanish
21 Congregation of Jehovah's Witnesses at the time of the molestation of Plaintiff. At the time of
22 the events that are the subject matter of this action, and prior to April of 2001, Defendant
23 Watchtower Bible & Tract Society of New York, Inc., made the final determination of which
24 men were appointed to the positions of Elder and Ministerial Servant for each Congregation of
25 Jehovah's Witnesses in the United States;

26
27 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:
28

1 All Documents hereto produced in the above-captioned action by any party to this
2 stipulation, as well as any document subsequently produced by any party to this stipulation, are
3 genuine and authentic, and satisfy the requirements for authentication as that term is used in
4 Evidence Code § 1400.

5 All Documents hereto produced in the above-captioned action by any party to this
6 stipulation, as well as any document subsequently produced by any party to this stipulation,
7 meets the requirements of a business record as that term is defined in Evidence Code § 1271.
8

9 No party will challenge the foundation, genuineness, or business record status of any
10 document produced at any time in this litigation by any party to this stipulation. Nothing in this
11 stipulated agreement shall be construed to limit, in any way, any party's right to object to the
12 admissibility of any document produced in this action, or any content included in any such
13 document, on any other ground (relevance, hearsay on hearsay, etc.).
14

15 Each individual holding the position of Ministerial Servant or Elder in any local
16 congregation of Jehovah's Witnesses, including Linda Vista Spanish Congregation of Jehovah's
17 Witnesses, is an agent, as that term is defined in Civil Code § 2295 of the local congregation in
18 which they hold that title, as well as an agent of The Watchtower Bible and Tract Society of
19 New York, Inc., for the time period prior to April 2001.

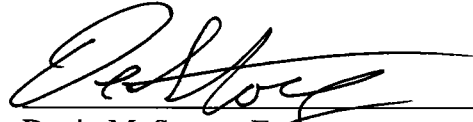
20 No Defendant will dispute that an individual holding the position of Elder or Ministerial
21 Servant is an agent of the local congregation to which he is appointed during the period of time
22 that he holds such positions, or that an individual holding such a position is an agent of The
23 Watchtower Bible and Tract Society of New York, Inc. during the period of time prior to April
24 2001 that he holds such position, and Plaintiffs will not conduct discovery for the purpose of
25 establishing that each local congregation of Jehovah's Witnesses is an agent or alter ego of The
26
27
28

1 Watchtower Bible and Tract Society of New York, Inc. Nothing in this agreement shall be
2 construed to preclude any party from conducting discovery regarding other issues.

3 IT IS SO STIPULATED.

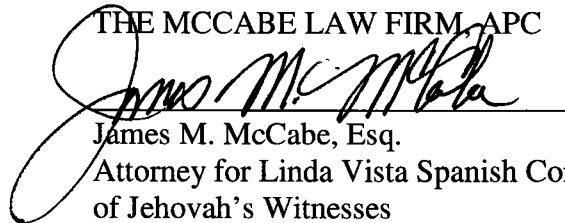
4 THE ZALKIN LAW FIRM, P.C.

5
6 Dated: 2/28/13


Devin M. Storey, Esq.
Attorney for Plaintiffs

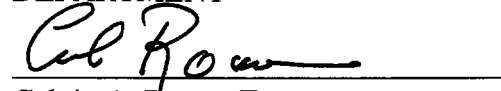
8 THE MCCABE LAW FIRM, APC

9
10 Dated: 2/28/13


James M. McCabe, Esq.
Attorney for Linda Vista Spanish Congregation of
of Jehovah's Witnesses

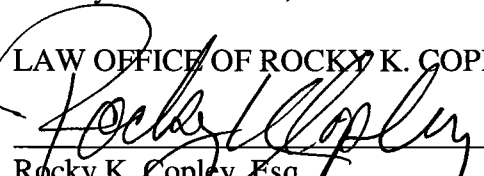
13 WATCHTOWER BIBLE & TRACT
14 SOCIETY OF NEW YORK, INC., LEGAL
DEPARTMENT

15
16 Dated: 2/28/13


Calvin A. Rouse, Esq.
Attorney for the Watchtower Bible and Tract
Society of New York, Inc.

18 LAW OFFICE OF ROCKY K. COPLEY

19
20 Dated: 2/28/13


Rocky K. Copley, Esq.
Attorney for the Watchtower Bible and Tract
Society of New York, Inc.