

***Exhibit D***

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK INC'S FOURTH SUPPLEMENTAL PRIVILEGE LOG

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
<b>Watchtower Legal Department Records</b>							
1.	07/22/1992	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Bruce Mapley, Sr.</b>	PDF	A/C
2.	07/22/1992 through 10/01/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Ashland, WI; Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. <b>Re: Legal Advice concerning Bruce Mapley, Sr., and Martin Svenson</b>	Lotus Notes PDF	A/C; TP
3.	07/22/1992 through 10/01/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; Ashland, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. <b>Re: Legal Advice Bruce Mapley, Sr., and Martin Svenson</b>	HuB PDF	A/C; TP
4.	04/08/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Roebuck, Birmingham, AL, Congregation. <b>Re: Legal Advice concerning Bruce Mapley, Sr.</b>	HuB PDF	A/C

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5.	03/26/1994	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, and Third Parties [P.M., A.A., and M.R.]</b>	PDF	A/C; TP
6.	03/26/1994 through 12/10/2018	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. <b>Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, Bruce Mapley, Sr., and Third Parties [P.M., A.A., and M.R.]</b>	Lotus Notes PDF	A/C; TP
7.	03/26/1994 through 12/10/2018	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. <b>Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, Bruce Mapley, Sr., and Third Parties [P.M., A.A., and M.R.]</b>	HuB PDF	A/C; TP
8.	05/01/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. <b>Re: Legal Advice concerning Martin Svenson</b>	HuB PDF	A/C
9.	05/07/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. <b>Re: Legal Advice concerning Martin Svenson</b>	HuB PDF	A/C
10.	10/17/2019 and 12/13/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. <b>Re: Legal Advice concerning Gunnar Hain</b>	Lotus Notes PDF	A/C; TP
11.	10/17/2019 and 12/13/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. <b>Re: Legal Advice concerning Gunnar Hain</b>	HuB PDF	A/C; TP

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12.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [A.A.]</b>	HuB PDF	A/C; TP
13.	07/29/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [J.C.]</b>	HuB PDF	A/C; TP
14.	01/16/2006 through 10/09/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [R.H.]</b>	HuB PDF	A/C; TP
15.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Nellie Means</b>	HuB PDF	A/C; TP
16.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [P.M.]</b>	HuB PDF	A/C; TP
17.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [A.M.]</b>	HuB PDF	A/C; TP
18.	04/02/2021	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [R.M.]</b>	HuB PDF	A/C; TP
19.	12/05/2003	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [J.N.]</b>	HuB PDF	A/C; TP
20.	11/01/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [K.R.]</b>	HuB PDF	A/C; TP
21.	05/24/2018 through 06/15/2018	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [M.R.]</b>	HuB PDF	A/C; TP

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22.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party James Rowland</b>	HuB PDF	A/C; TP
23.	04/23/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [M.S.]</b>	HuB PDF	A/C; TP
24.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Mildred Svenson</b>	HuB PDF	A/C; TP
25.	11/01/2014 through 09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [T.V.]</b>	HuB PDF	A/C; TP
26.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. <b>Re: Legal Advice concerning Third Party [C.W.]</b>	HuB PDF	A/C; TP
<b>Correspondence (March 14, 1997, BOE Letter Responses)</b>							
27.	04/19/1997	Letter	C.F. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [C.R.]</b>	PDF	CP; TP
28.	04/24/1997	Letter	H.P. Congregation	Service Department	Confidential communication <b>Re: seeking or receiving religious guidance, admonishment, or advice concerning Third Party [B.M.]</b>	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
29.	04/25/1997	Letter	Hardin Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party Gunnar Hain</b> [This specific communication has already been reviewed <i>in camera</i> by this Court and determined to be protected under Montana's clergy-penitent privilege under § 26-1-804 (see Court's order dated July 30, 2021, Doc #82 at pp. 3-4)]	PDF	CP; TP
30.	05/14/1997	Letter	E. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [M.C.]</b>	PDF	CP; TP
31.	05/29/1997	Letter	L. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [L.J.]</b>	PDF	CP; TP
32.	08/06/1997	Letter	T.B. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [G.J.]</b>	PDF	CP; TP
33.	08/12/1997	Letter	B. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [T.M.]</b>	PDF	CP; TP
34.	02/02/1999	Letter	E. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [N.O.]</b>	PDF	CP; TP
35.	02/07/2000	Letter	Be. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [K.M.]</b>	PDF	CP; TP
36.	04/06/2000	Letter	B.H. Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [R.G.]</b>	PDF	CP; TP
<b>Correspondence (Other)</b>							



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37.	09/15/1997	Letter	Hardin Congregation	Pacific WA Congregation	Confidential communication <b>Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain</b>	PDF	CP; TP
38.	09/14/1998	Letter	Hardin Congregation	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Martin Svenson</b>	PDF	CP; TP
39.	09/27/1999	Letter	Service Department	Hardin Congregation	Confidential communication <b>Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain</b>	PDF	CP; TP
40.	10/14/1999	Form	Canyon Ferry Congregation, Helena, MT	Service Department	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Bruce Mapley, Sr.</b>	PDF	CP; TP
41.	05/05/2011	Letter	Hardin Congregation	Legal Department	Letter seeking legal advice <b>Re: Threat of legal action in relation to Bruce Mapley, Sr., Gunnar Hain, and Martin Svenson</b>	PDF	A/C
42.	06/15/2011	Memorandum	Legal Department	Service Department	Attorney providing legal advice. <b>Re: Bruce Mapley, Sr., Gunnar Hain, and Martin Svenson</b>	PDF	A/C
43.	12/26/2014	Memorandum	Service Department	Legal Department	Memo seeking legal advice. <b>Re: Bruce Mapley, Sr.</b>	PDF	A/C
44.	01/02/2015	Memorandum	Legal Department	Service Department	Attorney providing legal advice. <b>Re: Bruce Mapley, Sr.</b>	PDF	A/C
<b>Watchtower Legal Department Client Intake Forms</b>							
45.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. <b>Re: Seeking legal advice involving David Means and Nellie Means</b>	PDF	A/C; TP
46.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. <b>Re: Seeking legal advice involving David Means and Third Party [P.M.]</b>	PDF	A/C; TP
47.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. <b>Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]</b>	PDF	A/C; TP
48.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. <b>Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]</b>	PDF	A/C; TP

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49.	04/30/2020	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. <b>Re: Legal issue involving third party unrelated to this litigation [M.S.]</b>	PDF	A/C; TP
<b>Amended Entries [09/23/2022]</b>							
50.	01/06/1996	Notes	Hardin Congregation	N/A	Internal note documenting legal advice received by the Hardin Congregation from Watchtower New York Legal Department. <b>[See Hardin Congregation Privilege Log]</b>	PDF	A/C; TP
51.	01/04/1997	Notes	Hardin Congregation	N/A	Internal notes by Hardin congregation elders documenting ecclesiastical communications made in confidence to the elders for the purpose of seeking or receiving religious guidance, admonishment, or advice. <b>[This specific document has already been reviewed <i>in camera</i> by this Court and certain portions were determined to be protected under Montana’s clergy-penitent privilege under § 26-1-804 (see Court’s order dated September 20, 2021, Doc #77 at pp. 3-4). This item has already been produced by the Hardin Congregation (see ROW_HARDIN000105-108) and is being reproduced in identical redacted form in accordance with this Court’s decision. See document bates-numbered WTNY 000770-000773]</b>	PDF	CP; TP



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52.	02/19/1997	Notes	Hardin Congregation	N/A	Internal notes by Hardin Congregation elders documenting ecclesiastical communications made in confidence to the elders for the purpose of seeking or receiving religious guidance, admonishment, or advice. <b>[see Hardin Congregation Privilege Log. This specific document has already been reviewed <i>in camera</i> by this Court and determined to be protected under Montana’s clergy-penitent privilege under § 26–1–804 (see Court’s order dated September 20, 2021, Doc #77 at p. 5)].</b>	PDF	CP; TP
<b>Amended Entries [02/16/2023] [Revised 07/05/2023]</b>							
53.	10/07/1999	Letter	West Laurel Congregation MT body of elders	Service Department (for the “Montana desk” elders)	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [T.T.]</b> <b>The letter describes: (a) allegations of serious sin committed by TT, including written accusations from an accuser and personal observations from the accuser’s brother; (b) Elders’ efforts to evaluate the allegations in the context of ecclesiastical discipline; (c) confessions and denials by a penitent in a confidential setting; and (d) Scripturally-based advice from experienced Service Department elders in New York to West Laurel Congregation elders. Two attachments are included with the letter that were used by the elders as Scripturally-based evidence in the disciplinary process.</b>  <b>This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b>	PDF	CP; TP

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54.	03/23/1993	Letter	T.B.	T.T.	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See document bates-numbered WTNY003955-WTNY003956.	PDF	TP
Amended Entries [07/05/2023]							
55.	03/19/2002	Letter	Ea.L Congregation MT body of elders	Be. Congregati on body of elders	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [N.O.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b> Letter sent to Be. Congregation containing allegations of serious sin committed by N.O. The letter outlines ecclesiastical discipline as a result of the serious sin along with observations about the mental health of N.O. It also provides contact information for a close family member to assist if mental health issues emerge.	PDF	CP; TP
56.	04/20/2002	Letter	Canyon Ferry MT Congregation body of elders	Iron River Congregati on, WI body of elders	Letter sent in connection with Bruce Mapley, Sr., relocating to a congregation in Wisconsin. The letter details: (a) serious sin committed by Mr. Mapley; (b) the resulting ecclesiastical decisions of Canyon Ferry elders and their decision about ecclesiastical discipline of Mr. Mapley; (c) ongoing ecclesiastical discipline imposed by the elders on Mr. Mapley; and (d) the importance of confidentiality about each of these matters (elders only, to further the spiritual counseling to be provided Mr. Mapley)	PDF	CP

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57.	05/17/2002	Letter	Bu. Congregation MT body of elders	Service Department (for Elders overseeing "Montana desk")	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Parties [Jo.E. and Ro.E]</b> This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</p> <p>Letter sent in reply to experienced Service Department elders in New York regarding third-parties Jo.E. and Ro.E. The letter details: (a) allegations of serious sin committed by Jo.E. and Ro.E.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements from Jo.E.; (d) statements made in confidence from the other party involved in the serious sin, S. (e) statements made by an eyewitness to alleged acts of serious sin; (f) the emotional and spiritual impact the serious sin had on the brother of Ro.E.; and (g) the deliberations of two elders who evaluated allegations of serious sin committed by Jo.E. in the context of determining whether ecclesiastical discipline should be administered</p>	PDF	CP; TP

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58.	08/18/2002	Letter	Bi.H. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [D.W.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits.</b> Letter seeking spiritual direction sent to experienced Service Department elders in New York regarding third-party D.W. The letter details: (a) allegations of serious sin committed by D.W.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements made by third-party D.W.; (d) 3 separate instances of ecclesiastical discipline administered by the congregation elders in connection with a variety of serious sins committed by D.W.	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
59.	01/22/2003	Letter	Ea.G-F Congregation MT body of elders	Service Department (for the "Montana desk" elders)	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [R.G.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits.</b> Letter sent to experienced Service Department elders in New York requesting spiritual assistance and guidance with an ecclesiastical disciplinary matter (a "judicial case") involving third-party R.G. The letter details: (a) allegations of serious sin committed by R.G.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements from R.G.; (d) decision by R.G.'s husband on how the serious sin would affect their marriage; (e) previous ecclesiastical discipline of both R.G. and her husband for serious sin they committed 9-10 years prior.	PDF	CP; TP
60.	04/18/2003	Letter	Iron River WI body of elders	Service Department (for the "Wisconsin desk" elders)	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Bruce Mapley, Sr.</b> Letter sent seeking Spiritual direction from experienced Service Department elders in New York, regarding Mr. Mapley being reinstated. The letter details: (a) serious sin by Mr. Mapley; (b) confessional statements made by Mr. Mapley; (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; and (d) the elders' questions about what ongoing ecclesiastical discipline should be imposed by the elders on Mr. Mapley.	PDF	CP

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61.	05/10/2003	Letter	Canyon Ferry Congregation MT, body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Bruce Mapley, Sr.</b>                      Letter sent to experienced Service Department elders in New York, regarding Mr. Mapley.                      The letter details: (a) serious sin by Mr. Mapley; (b) confessional statements made by Mr. Mapley; (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (d) the recitation of confidential discussions between elders in Canyon Ferry Congregation, MT and elders in Iron River Congregation, WI.                      The letter was signed by a "judicial committee" (three elders tasked with making a Scriptural evaluation of Mr. Mapley's repentance) and refers to notes by the judicial committee elders detailing Mr. Mapley's serious sin.</p>	PDF	CP



PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
62.	06/03/2003	Letter	No.H. Congregation MT body of elders	We.M Congregation on MT body of elders	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [D.B.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b>                      Letter sent to We.M Congregation to assist third-party D.B. to regain spiritual strength. The letter details: (a) allegations of serious sin committed by D.B.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements from D.B.; (d) statements made in confidence from the other party involved in the serious sin, J.H. (e) the elders' decision about the ecclesiastical discipline of D.B.; (f) the emotional and spiritual impact the serious sin had on family members of J.H.; (g) communications between D.B. and the elders of the judicial committee regarding the ecclesiastical discipline imposed on D.B.</p>	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
63.	06/03/2003	Letter	No.H. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [D.B.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b> Letter sent in reply to experienced Service Department elders in New York in connection with third-party D.B. The letter details: (a) allegations of serious sin committed by D.B.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements from D.B.; (d) statements made in confidence from the other party involved in the serious sin, J.H. (e) the elders' decision about the ecclesiastical discipline of D.B.; (f) the emotional and spiritual impact the serious sin had on family members of J.H.; (g) the elder body's communications with third-party congregation We.M regarding D.B.'s serious sin (h) communications between D.B. and elders of the judicial committee regarding the ecclesiastical discipline imposed on him.	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
64.	01/14/2004	Letter	So.L. Congregation MT body of elders	Service Department (for the "Montana Desk" elders)	Confidential communication <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [R.J.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b> Letter sent to experienced Service Department elders in New York regarding third-party R.J. The letter details: (a) allegations of serious sin committed by R.J.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) communications between R.J. and his father (who was an elder); and (d) the elders' observations on R.J.'s spiritual progress and desire to be allowed privileges in the congregation	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
65.	04/16/2005	Letter	T.F. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [T.H.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b>                      Letter sent seeking spiritual guidance from experienced Service Department elders in New York regarding third-party T.H. The letter details: (a) allegations of serious sin committed by T.H.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements about serious sin from third party Do.B.; (d) the elders' determination about ecclesiastical discipline of Do.B.; (e) T.H.'s statements of denial during an ecclesiastical investigation; (f) statements from the other party involved in the serious sin, J., made to elders during an ecclesiastical investigation; (g) determination of elders about the spiritual qualifications of T.H.; (e) request for insight from experienced Service Department elders in New York about what privileges in the congregation T.H. could receive in view of the allegations of serious sin.</p>	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
66.	07/03/2005	Letter	So.R. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Parties [D.C. and K.P.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent in reply to experienced Service Department elders in New York regarding third-parties D.C. and K.P. The letter details: (a) allegations of serious sin committed by D.C. and K.P.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) the ecclesiastical disciplinary action taken by the elders as to both D.C. and K.P.; (d) confessional statements about serious sin made by K.P.; (e) communications with third-party congregation C.F. regarding the ecclesiastical discipline of D.C.; (e) communications with third-party congregation St.I. regarding the ecclesiastical discipline of K.P.</p>	PDF	CP; TP

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67.	07/21/2005	Letter	St.I. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [K.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent to experienced Service Department elders in New York regarding third-party K. The letter details: (a) allegations of serious sin committed by K.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements by K.; and (d) expressions from K.'s wife to elders regarding the possibility of their marriage ending.</p>	PDF	CP; TP
68.	08/10/2005	Letter	Be. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [N.O.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent to experienced Service Department elders in New York regarding third-party N.O. The letter details: (a) allegations of serious sin committed by N.O.; (b) answers to the questions in the March 14, 1997 BOE letter; (c) confessional statements by N.O. about serious sin he committed; and (d) a history of 3 separate ecclesiastical disciplinary reviews for a variety of serious sins committed by N.O. and the ecclesiastical disciplinary steps taken by elders</p>	PDF	CP; TP



PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
69.	04/05/2006	Letter	So.R. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [Je.M.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b>                      Letter sent in reply to experienced Service Department elders in New York, regarding third-party Je.M. The letter details: (a) serious sin committed by Je.M. when he was a minor; (b) confessional statements about his serious sins made by Je.M.; and (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter about Je.M.</p>	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
70.	05/05/2007	Letter	So.Ha. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [M.H.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent seeking Spiritual direction from experienced Service Department elders in New York, regarding third-party M.H. The letter details: (a) serious sin committed by M.H.; (b) confessional statements and denials made by M.H.; (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (d) expressions of remorse by M.H. (e) statements by M.H. as to the emotional impact of serious sin and how it has affected his relationship with God and others; (f) request by elder body for clarification on whether the spiritual guidance from experienced elders in New York in connection with M.H. would also apply to other matters of serious sin involving third party C.B.</p>	PDF	CP; TP

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71.	04/05/2009	Letter	S.H. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [S.B.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent to experienced Service Department elders in New York upon conclusion of an ecclesiastical disciplinary process involving third-party S.B. The letter details: (a) serious sin committed by S.B.; (b) confessional statements made by S.B.; (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (d) spiritual counseling provided, and Scriptural passages used, by the elders in an attempt to help S.B. reconcile with God; (e) communication with elders in third-party congregation P.-H. Idaho, to help P.-H. elders provide ongoing spiritual assistance to S.B.</p>	PDF	CP; TP
72.	10/19/2009	Letter	L.P. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [J.D.M.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent to experienced Service Department elders in New York regarding third-party J.D.M. The letter details: (a) allegations of serious sin committed by J.D.M.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) conclusions reached by the elders on completion of the ecclesiastical disciplinary process about J.D.M.'s sin and repentance.</p>	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
73.	10/28/2009	Letter	P.V. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [S.B.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent to experienced Service Department elders in New York regarding third-party S.B. The letter details: (a) allegations of serious sin committed by S.B.; and (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter about S.B.</p>	PDF	CP; TP
74.	01/13/2010	Letter	L.P. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [J.D.M.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent to experienced Service Department elders in New York regarding third-party J.D.M. The letter details: (a) allegations of serious sin involving J.D.M.; (b) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (c) conclusions reached by the elders upon completion of the ecclesiastical disciplinary process.</p>	PDF	CP; TP

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75.	11/09/2010	Letter	Bi-F. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [D.K.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent in reply to experienced Service Department elders in New York, regarding third-party D.K. The letter details: (a) allegations of serious sin involving D.K.; (b) statements of accusation made by third-party E.H. who was present when the alleged act of serious sin occurred; (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; (d) statements and denials of D.K.; (e) information pertaining to an ecclesiastical judicial case involving D.K.; The letter also contains attorney-client privileged information relating the request made and legal advice provided when two of the elders in Bi-F. Congregation called for and receive legal advice from a Watchtower Legal Department attorney about the elders' duty to report alleged child abuse.</p>	PDF	CP; TP; AC

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
76.	12/12/2010	Letter	P.V. Congregation MT body of elders	Y.M. Congregation body of elders in California	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [B.C.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent as part of an ecclesiastical investigation into allegations of serious sin involving third-party B.C. The letter details: (a) specific allegations of serious sin committed by B.C.; (c) the ecclesiastical procedure followed by elders in P.V. congregation in conducting their spiritual investigation; (c) documented statements from eyewitnesses; (d) documented statements from third-party B.C.; (e) the congregation elders' answers to the March 14, 1997, BOE letter; and (f) the conclusion reached by elders in P.V. Congregation upon completion of the ecclesiastical investigation.</p>	PDF	CP; TP



PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
77.	09/21/2011	Letter	C.Fo. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [N.B.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent to experienced Service Department elders in New York as a supplement to an S-77 form documenting ecclesiastical disciplinary action taken by congregation elders in connection with third-party N.B. The letter details: (a) serious sin committed by N.B.; (b) confessional statements made by N.B.; (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; and (d) spiritual counseling provided by elders in a confidential setting.</p>	PDF	CP; TP
78.	10/26/2011	Letter	C.F. Congregation MT body of elders	Service Department (for the "Montana desk" elders)	<p>Confidential communication  <b>Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [D.J.J.] This letter does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p> <p>Letter sent seeking Spiritual direction and insight from experienced elders in New York, regarding third-party D.J.J. The letter details: (a) serious sin committed by D.J.J.; (b) confessional statements made by D.J.J.; (c) the congregation elders' answers to the questions in the March 14, 1997 BOE letter; and (d) request for spiritual insight from experienced elders in New York.</p>	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
79.	12/24/2013	Letter	Hardin Congregation elders MT	Service Department elders	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See documents bates-numbered CCJW000171-000177 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	TP
80.	08/21/2017	Letters	Various	Various	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy and clergy-penitent privileged information. See documents bates-numbered CCJW000178-000184 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	CP; TP
81.	08/28/2017	Letter	Service Department	Hardin Congregation body of elders MT	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See documents bates-numbered CCJW000185-000186 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	TP
82.	06/10/2019	Letter	R.T.	Service Department elders	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See documents bates-numbered CCJW000187-000193 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	TP
83.	06/25/2019	Letter	Service Department elders	R.T.	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See documents bates-numbered CCJW000194-000195 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	TP

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84.	07/18/2019	Letter	Hardin Congregation MT body of elders	Service Department elders	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See documents bates-numbered CCJW000196-000197 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	TP
85.	07/19/2019	Letter	Service Department elders	R.T.	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See documents bates-numbered CCJW000198-000199 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	TP
86.	Undated	Letter	J.W.	Service Department elders	Produced subject to the Stipulated Confidentiality Agreement and Protective Order with redactions to protect third-party privacy. See documents bates-numbered CCJW000145-000148 <i>See, NAACP v. Alabama</i> (1958) 357 U.S. 449.	PDF	TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
87.	04/15/2015	Memorandum of Record	Service Department ("Montana desk" elders)	N/A	<p>Internal summary created by Service Department elders based on correspondence/communications from elders describing accusations of serious sin involving Third Party R.P. The memorandum details: (a) confessional statements of R.P. in the context of an ecclesiastical disciplinary process; (b) ecclesiastical discipline administered by congregation elders; (c) steps taken by R.P.'s wife in response to allegations of serious sin; (d) communications between congregation elders in S. Congregation OR and Hardin Congregation MT elders regarding allegations of serious sin involving R.P.</p> <p><b>This memorandum does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p>	PDF	CP; TP
88.	10/20/2016	Memorandum of Record	Service Department ("Montana desk" elders)	N/A	<p>Internal summary created by Service Department elders based on correspondence/communications from elders describing accusations of serious sin involving Gunnar Hain. The memorandum details: (a) confessional statements of Gunnar Hain; (b) statements from other parties to the alleged serious sin; (c) response of Service Department elders to the elders involved in Montana in the context of ecclesiastical discipline.</p>	PDF	CP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
89.	12/23/2017	Memorandum of Record	Service Department ("Montana desk" elders)	N/A	Internal summary created by Service Department elders based on correspondence/communications from elders describing accusations of serious sin involving Martin Svensen. The memorandum details: (a) statements of denial of Martin Svensen; (b) statements from other parties to the alleged serious sin.	PDF	CP
90.	03/29/2017	Memorandum of Record	Service Department ("Montana desk" elders)	N/A	Internal summary created by Service Department elders based on correspondence/communications from elders describing accusations of serious sin involving Third Party R.H. who was a minor at the time of the alleged sin. The memorandum details: (a) statements of third parties J.M. and M.R. alleging serious sin; (b) details of the ecclesiastical investigation by congregation elders; (c) R.H.'s statements of denial.  <b>This memorandum does not pertain to any of the Plaintiffs or accused in these lawsuits</b>	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
91.	08/02/2017	Memorandum of Record	Service Department ("Montana desk" elders)	N/A	<p>Internal summary created by Service Department elders based on correspondence/communications from elders describing accusations of serious sin involving Third Party M.H. The memorandum details: (a) confessional statements of M.H. made during the course of elders ecclesiastical investigation; (b) conclusions and ecclesiastical discipline administered by congregation elders; (d) denials by Third Party M.H. in connection with allegations of serious sin.</p> <p><b>This memorandum does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p>	PDF	CP; TP
92.	12/27/2017	Memorandum of Record	Service Department ("Montana desk" elders)	N/A	<p>Internal summary created by Service Department elders based on correspondence/communications from elders describing accusations of serious sin involving Third Party R.L.M. The memorandum details: (a) confessional statements of R.L.M.; (b) conclusions and ecclesiastical discipline administered by congregation elders</p> <p><b>This memorandum does not pertain to any of the Plaintiffs or accused in these lawsuits</b></p>	PDF	CP; TP



PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
93.	11/16/2019	Memorandum of Record	Service Department ("Montana desk" elders)	N/A	Internal summary created by Service Department elders based on correspondence/communications from elders describing accusations of serious sin involving Bruce Mapley, Sr. The memorandum details: (a) confessional statements by Mr. Mapley; (b) statements from other parties to the alleged serious sin; (c) response of Service Department elders to the Montana elders involved, in the context of ecclesiastical discipline.	PDF	CP

Key:

A/C = Attorney-Client Privilege

CP = Clergy-Penitent Privilege

TP = Third-Party/Associational Right to Privacy (*See, NAACP v. Alabama* (1958) 357 U.S. 449.)

Date: July 5, 2023

Submitted by Brown Law Firm, P.C., on behalf of Defendant Watchtower Bible and Tract Society of New York, Inc.