

*Exhibit N*

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

TRACY CAEKAERT, and  
CAMILLIA Mapely,

Plaintiffs,

vs.

Case No. CV-20-52-BLG-SPW

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC., and WATCH TOWER BIBLE  
AND TRACT SOCIETY OF  
PENNSYLVANIA.

Defendants,

\_\_\_\_\_ )

Expert Videotaped Deposition  
In Person/Zoom Videoconference

Bradley Lovett

August 11, 2023

Reported By: Gidgette Nieves, CSR No. 10142  
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10:06:06 1 assigned him up there.

10:06:08 2 Q Who's they, when you say they assigned  
10:06:12 3 him?

10:06:12 4 A This -- the Society. Who would now be  
10:06:14 5 known as the branch. But the Watch Tower Bible  
10:06:19 6 Tract Society they're the ones that make these  
10:06:24 7 assignments and he got his from there. And that was  
10:06:25 8 -- would tell them the number of congregations and  
10:06:29 9 things that he was to work with.

10:06:32 10 Q And was he part of the conversation  
10:06:32 11 amongst your friends? Was he aware you're moving to  
10:06:33 12 Red Lodge?

10:06:37 13 A And not him. At that time that would have  
10:06:40 14 been another -- another circuit overseer. They  
10:06:50 15 serve through the years they change.

10:06:51 16 Q Who was the circuit overseer after --  
10:06:52 17 THE WITNESS: I have a hard time hearing  
10:06:52 18 you.

10:06:57 19 MR. MCCABE: She wants you to speak up a  
10:07:00 20 little louder.

10:07:02 21 THE WITNESS: Ah. I couldn't hear her  
10:07:02 22 say, to be honest.

10:07:03 23 BY MR. SHAFFER:

10:07:03 24 Q Who was circuit overseer after Mr.  
10:07:07 25 Slagel?

10:29:24 1 whatever. We just -- that was pretty common.

10:29:26 2 Q And that's what the literature would say,  
10:29:28 3 right, the literature would say with the Society,  
10:29:31 4 wouldn't it, the publications?

10:29:33 5 MR. TAYLOR: Again Objection to the  
10:29:34 6 form.

10:29:35 7 THE WITNESS: What would -- yeah, what  
10:29:37 8 would you have in mind? What were you -- what were  
10:29:39 9 you thinking?

10:29:40 10 BY MR. SHAFFER:

10:29:40 11 Q Well, I want to know what you were  
10:29:42 12 thinking. How did you come to refer to as the  
10:29:44 13 Society? I mean you saw that somewhere, right?

10:29:46 14 A Well, it -- it was printed by them.  
10:29:48 15 Whatever it was printed we'd say well, we got that  
10:29:52 16 from the Society.

10:29:53 17 Q Okay. And did you understand the Society  
10:29:54 18 was different from the branch office?

10:29:57 19 A They are somewhat different in the sense  
10:30:03 20 that -- but we -- we just generally referred to it  
10:30:05 21 as -- as the Society. We wrote a letter to the  
10:30:08 22 Society and it would be to the branch actually. But  
10:30:12 23 we just --

10:30:15 24 Q Okay. All right. We were talking about  
10:30:16 25 how you learned to do your job as an elder. We

11:06:46 1 the time.

11:06:47 2 Q What was the policy with judicial  
11:06:48 3 things?

11:06:50 4 A Well, you would keep them for a period of  
11:06:52 5 time, but they would always be in the -- in the  
11:06:55 6 congregation filed and locked, that sort of thing.

11:07:00 7 Q How did the elders learn when they were  
11:07:02 8 supposed to purge judicial things?

11:07:05 9 A You just got -- you -- you get a letter --  
11:07:08 10 generally it would say, you know, you don't get rid  
11:07:10 11 of the judicial things for a number of years. And  
11:07:14 12 they had -- I think they had some -- some  
11:07:18 13 stipulations about it, but I can't remember.

11:07:22 14 Q When you say "they," again you're  
11:07:25 15 referring to --

11:07:25 16 A The branch.

11:07:26 17 Q -- the branch office?

11:07:27 18 A They would give direction on that.

11:07:29 19 Q The branch office is part of the Society  
11:07:31 20 in New York as you understood it?

11:07:33 21 A Uh-huh, yes.

11:07:40 22 Q Circuit Overseer. I want to know about  
11:07:43 23 document retention as an elder. Let's talk about  
11:07:47 24 circuit overseers. And I think you touched on it.  
11:07:50 25 I might have missed a little bit. But do you keep

11:12:51 1 there's times when they need something to do this.

11:12:54 2 Because you know they -- they come and go as well.

11:12:57 3 And the circuit overseer generally would inquire

11:13:01 4 than they -- I guess like the congregation, I don't

11:13:06 5 know what they -- how they handled it back then.

11:13:08 6 But we're --

11:13:10 7 Q When you say "they needed," you mean the  
11:13:12 8 Watch Tower Society?

11:13:13 9 A Uh-huh. The -- the branch. You know,  
11:13:14 10 what I would call the branch today, the Watch Tower  
11:13:18 11 Society, yes.

11:13:19 12 Q Okay. And the documents I've seen kind of  
11:13:21 13 describe the process like this. The current circuit  
11:13:25 14 overseer who's interacting with all the elders in  
11:13:28 15 the congregation in that circuit would kind of be in  
11:13:32 16 the lookout for people who would be a good fit as a  
11:13:37 17 circuit overseer. Is that fair so far?

11:13:39 18 A Yes. And availability was the big deal.  
11:13:43 19 You know, who can -- who can pick up and go like  
11:13:45 20 that. Like if you have a family you know you --

11:13:48 21 Q Tell me about that. Yeah, what does  
11:13:50 22 availability mean, someone who is able to just move  
11:13:54 23 at the drop of a dime?

11:13:55 24 A Well, in circuit you change every -- you  
11:13:58 25 change your group of approximately 20 or more

14:50:40 1 A Yes.

14:50:41 2 Q Are Bethelites people in the branch  
14:50:44 3 office?

14:50:45 4 A Yes. I doubt you know the answer to any  
14:50:47 5 of those.

14:50:53 6 Q And that's okay. I'm just interested in  
14:50:56 7 your answers, I guess. All right.

14:51:01 8 But thank you for helping me understand a  
14:51:03 9 little bit.

14:51:04 10 What -- what's the difference in your view  
14:51:06 11 between the service department and the branch  
14:51:08 12 office?

14:51:11 13 A Rephrase that, what?

14:51:12 14 Q In your mind, what's the difference  
14:51:14 15 between the service department and the branch  
14:51:17 16 office?

14:51:17 17 A Well, the service department as I  
14:51:20 18 understand is part of the -- the branch.

14:51:26 19 Q Okay.

14:51:27 20 A It's a department there.

14:51:29 21 Q And then what's the difference between the  
14:51:30 22 branch and like Watch Tower corporations, in your  
14:51:34 23 view?

14:51:35 24 A Well, one, the corporation, the legal  
14:51:37 25 means by which they do these things. And the branch

14:51:42 1 is mainly dealing with our country or a country.

14:51:44 2 Q Okay. And does the branch have like  
14:51:47 3 letterhead and stuff? Does it say Jehovah's Witness  
14:51:51 4 branch office?

14:51:52 5 A I think they -- I think it does go into  
14:51:55 6 the branch now. But the Watch Tower was the heading  
14:51:59 7 for years. And then now this is viewed as a branch  
14:52:04 8 then they -- they can mention that. I don't -- You  
14:52:07 9 know, I don't actually know what their letterhead is  
14:52:11 10 at this time.

14:52:12 11 Q When you were getting reimbursement  
14:52:14 12 checks, were those coming on Watch Tower checks?

14:52:18 13 A They actually I think were just credited  
14:52:22 14 to our -- our account so to speak.

14:52:25 15 Q What does that mean?

14:52:27 16 A Where they would give you credit and then  
14:52:30 17 you could request that, basically.

14:52:34 18 Q How would they pay?

14:52:36 19 A Well they would -- they would give you a  
14:52:40 20 credit there at the branch itself if you wanted  
14:52:42 21 to (unintelligible). They have a little store there  
14:52:47 22 for groceries and things for the Bethelites.

14:52:52 23 Q When you were circuit overseeing you were  
14:52:54 24 getting reimbursed for gas on your allowance, which  
14:52:58 25 you said wasn't much. Would you get a check or