

Exhibit LL

Shirley Gibson

1 SOCIETY OF NEW YORK, INC.
2 and WATCH TOWER BIBLE AND
3 TRACT SOCIETY OF
4 PENNSYLVANIA,
5 Defendants.

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VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION OF
SHIRLEY GIBSON

BE IT REMEMBERED, that the
videoconference/videotaped deposition upon oral
examination of Shirley Gibson, appearing at the
instance of the Plaintiffs, was taken at 800 North
Last Chance Gulch, Suite 101, Helena, Montana, on
Thursday, April 14, 2022, beginning at the hour of
9:07 a.m., pursuant to the Federal Rules of Civil
Procedure, before Mary R. Sullivan, Registered
Merit Reporter, Certified Realtime Reporter, and
Notary Public.

Shirley Gibson

1 Q. Okay. Who -- Can you identify other
2 people who knew about it by name?

3 A. Martin Svenson, James Rowland,
4 Joyce Hains, June Rimby. All deceased now.

5 Q. Mm-hmm. Anyone else that you know that
6 knew about it?

7 A. No.

8 Q. Were you permitted to tell people about
9 it?

10 A. I could have, but I didn't.

11 Q. Okay. So you understood that you could,
12 you could have gone to the authorities or you
13 could have told people about it, but you didn't.

14 A. Yes.

15 Q. You chose not to.

16 A. I chose not to.

17 Q. Okay.

18 A. It was a mistake.

19 Q. Sorry?

20 A. Was a mistake.

21 Q. Okay. And had you ever been taught as a
22 member of the church that the elders direct how to
23 handle situations like wrongdoing within the
24 congregation?

25 A. Yes.

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1 Q. Okay. Tell me about that. When were you
2 taught that?

3 A. I suppose during my studies. I
4 don't -- I don't remember where I learned it. I
5 mean, it's just something we do.

6 Q. How was it supposed to work, then? So
7 there's -- there's alleged wrongdoing in the
8 church. How is it supposed to work? What are --
9 What are you supposed to do with that information?

10 A. Okay. You go to the elders.

11 Q. Okay.

12 A. You have a sit-down with them, tell them
13 the situation, and they take care of it.

14 Q. And they're in charge of handling that,
15 right, at that point?

16 A. Yes.

17 Q. It's out of your hands.

18 A. Yes.

19 Q. Okay.

20 A. Well, I mean, unless they need more
21 information.

22 Q. Okay. And is there a process that the
23 elders are supposed to use to determine if
24 wrongdoing has occurred?

25 A. I don't know how they handle it. I know

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1 they discuss it, and I don't -- I don't know.

2 Q. Yeah. Right. Is it a process, though,
3 that as a member you've -- you come to trust this
4 process, you're taught this process if there's
5 wrongdoing, you take it to an elder and you trust
6 it's going to be handled. Right?

7 A. Yes.

8 Q. Okay. And that's what you're taught as a
9 member.

10 A. Yes.

11 Q. Okay. Did you know Mr. Hain?

12 A. Yes, I did.

13 Q. And did he voluntarily go to Mr. Rimby
14 and the elders to say, "Hey," --

15 A. I have no idea.

16 Q. -- "I molested" --

17 A. I never asked.

18 Q. So you don't know how that came about.

19 A. Hm-mmm.

20 Q. And do you know what brought about
21 Bruce's decision to tell Mr. Rimby that he had
22 been molesting Tracy?

23 A. I don't know what his reason was.
24 Probably because he'd molested other girls, too,
25 so -- I don't know that for sure, but...

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1 A. So how could we control --

2 Q. Sure.

3 A. -- what he did?

4 Q. Sure. Yeah.

5 A. I don't think the organization should be
6 responsible for somebody's conduct.

7 Q. I understand, yeah.

8 Do you know what Mr. Rimby did, if
9 anything?

10 A. No, I do not.

11 Q. So you don't know if he did anything with
12 the information you gave him.

13 A. No.

14 Q. But you did trust that was the proper way
15 to handle it. Correct?

16 A. Yes.

17 Q. Okay. Tell me about that. Why did you
18 trust that that was the proper way to handle it?

19 A. Well, because Jehovah has an
20 organization. He's appointed men to shepherd our
21 congregation, take care of us.

22 Q. Those men being the elders.

23 A. Yes.

24 Q. In your experience with the church, have
25 you -- have you been able to observe how members