

1 **WATCHTOWER BIBLE AND TRACT**
2 **SOCIETY OF NEW YORK, INC.**
3 **LEGAL DEPARTMENT**

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9 Attorney for Watchtower Bible and Tract
10 Society of New York, Inc. (sued as "Defendant
11 Doe 3, Supervisory Organization")

12 **SUPERIOR COURT OF CALIFORNIA**
13 **COUNTY OF SAN DIEGO**

14 **JOHN DORMAN, INDIVIDUALLY, AND**)
15 **JOEL GAMBOA, INDIVIDUALLY**)

16 Plaintiffs,)

17 vs.)

18 **DEFENDANT DOE 1 LA JOLLA CHURCH,**)
19 **DEFENDANT DOE 2 LINDA VISTA**)
20 **CHURCH AND DEFENDANT DOE 3**)
21 **SUPERVISORY ORGANIZATION,**)
22 **DEFENDANT DOE 4, PERPETRATOR,**)
23 **AND DOES 5 THROUGH 100, INCLUSIVE**)

24 Defendants.)

Case No.: 37-2010-00092450-CU-PO-CTL

DECLARATION OF MARIO F. MORENO
IN SUPPORT OF DEFENDANT
WATCHTOWER'S LODGMET OF
EXHIBITS IN SUPPORT OF SEPARATE
STATEMENT OF FACTS IN REPLY TO
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT

JUDGE: STEVEN R. DENTON
DEPT.: C-73
DATE: December 16, 2011
TIME: 10:30 a.m.

TRIAL DATE: April 20, 2012

25
DECLARATION OF MARIO F. MORENO IN SUPPORT OF DEFENDANT WATCHTOWER'S
LODGMET OF EXHIBITS IN SUPPORT OF SEPARATE STATEMENT OF FACTS IN REPLY TO
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

1 I, Mario F. Moreno, declare as follows:

- 2 1. I am an attorney of record for Watchtower Bible and Tract Society of New York, Inc.
3 (sued as "Defendant Doe 3, Supervisory Organization") and I personally read and
4 prepared the attached Defendant Watchtower's Lodgment of Exhibits in Support of
5 Separate Statement of Facts in Reply to Plaintiffs' Opposition to Defendants' Motions for
6 Summary Judgment; and
- 7 2. Attached as Defendant's Exhibit A to Defendant Watchtower's Lodgment of Exhibits in
8 Support of Separate Statement of Facts in Reply to Plaintiffs' Opposition to Defendants'
9 Motions for Summary Judgment is Second Affidavit of Allen Shuster.
- 10 3. Attached as Defendant's Exhibit B to Defendant Watchtower's Lodgment of Exhibits in
11 Support of Separate Statement of Facts in Reply to Plaintiffs' Opposition to Defendants'
12 Motions for Summary Judgment are true and correct copies of pages 1, 16, 17, 20, 171,
13 and 173 of the deposition of Gonzalo Campos.
- 14 4. Attached as Defendant's Exhibit C to Defendant Watchtower's Lodgment of Exhibits in
15 Support of Separate Statement of Facts in Reply to Plaintiffs' Opposition to Defendants'
16 Motions for Summary Judgment is Affidavit of Ralph Schaefer.
- 17 5. Attached as Defendant's Exhibit D to Defendant Watchtower's Lodgment of Exhibits in
18 Support of Separate Statement of Facts in Reply to Plaintiffs' Opposition to Defendants'
19 Motions for Summary Judgment is Affidavit of Ramon Preciado.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is
21 true and correct to the best of my knowledge and belief.

22 DATED: December 8, 2011

23 Watchtower Bible and Tract Society of New
24 York, Inc., Legal Department

25 By: 

Mario F. Moreno
Attorney for Defendant Watchtower
Bible and Tract Society of New York,
Inc. (sued as "Doe 3, Supervisory
Organization")