

1 I, Irwin M. Zalkin, based upon my personal knowledge declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California. I am the senior
3 attorney operating The Zalkin Law Firm, P.C., and my firm is counsel of record for Plaintiff
4 Jose Lopez, herein.

5 2. This action results from the sexual abuse of Plaintiff Jose Lopez by Gonzalo Campos.
6 The molestation arose from Plaintiff and Campos' mutual association with Defendants Linda
7 Vista Spanish Congregation of Jehovah's Witnesses ("Linda Vista") and Watchtower Bible and
8 Tract Society of New York, Inc. ("Watchtower").

9 3. On January 2, 2014, this Court ordered that the depositions of Defendant Watchtower
10 Bible and Tract Society of New York, Inc.'s Person Most Qualified and Gerrit Losch must be
11 taken by April 2, 2014. In connection with the deposition of the PMQ, Watchtower was
12 instructed to produce all of the documents requested in the deposition notice.
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14 4. On March 31, 2014, and April 1, 2014, I took the depositions of Richard Ashe and
15 Mario Moreno, Esq., who cumulatively comprised the PMQ. Although the documents were
16 order produced, neither witness produced documents relating to claims of molestation of
17 children, other than Plaintiff, which have been made known to Watchtower.
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19 5. On April 2, 2014, Devin Storey and I appeared to take the deposition of Gerrit Losch.
20 Mr. Losch did not appear.
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22 6. Watchtower's refusal to comply with this Court's January 2, 2014 order has resulted in
23 economic cost to Plaintiff and in the waste of my time, as follows:

24 7. On February 4, 2014, I wrote to counsel for Mr. Losch, requesting dates for his
25 deposition. On February 5, 2014, I received a response refusing to acknowledge that there was
26 a standing order for his deposition and which refused to provide a date for the taking of the
27 deposition. This back and forth consumed .3 hours of my time.
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1 8. On March 13, 2014, I received a letter from Rocky K. Copley, Esq., informing me that
2 Watchtower would not be complying with this Court's order to produce documents at the PMQ
3 deposition. Later that day, I responded that Plaintiff would move forward with the depositions
4 as ordered. Reading Mr. Copley's letter and drafting a response consumed .7 hours of my time.

5 9. I spent 6 hours preparing to take the deposition of Gerrit Losch which included time
6 spent reviewing available information regarding Mr. Losch, preparing specific questions
7 relating to his relationship to the Governing Body and Watchtower, and other topics.

8 10. On April 2, 2014, I actually attended the deposition of Mr. Losch. Between time
9 traveling from my hotel to the deposition, waiting for Mr. Losch to arrive, observing while
10 Devin Storey made a record of Mr. Losch's non-appearance, and traveling back to my hotel,
11 Mr. Losch's non-appearance directly wasted .7 hours of my time.

12 11. I have been a licensed lawyer litigating cases since 1979. During the last twelve years, I
13 have been working largely on childhood sexual abuse cases. During this time I have handled
14 cases in the trial courts through the state, and argued matters in the courts of appeal and before
15 the Supreme Court of California. When working on childhood sexual abuse cases, my firm
16 values my time at \$650.00 per hour.

17 12. In addition to the consumption of time, there were direct economic costs that were
18 absorbed by Plaintiff. During my stay in Brooklyn, I stayed at the Aloft Hotel. The cost of my
19 accommodations was \$656.23. I also spent \$19.20 on cab fare to the deposition site. My airfare
20 cost \$1,693.00.

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

3 Executed this 8th day of April, 2014, at San Diego, California.

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6 Irwin M. Zalkin