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17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **COUNTY OF SAN DIEGO**

19 JOSE LOPEZ, an Individual,
20 Plaintiff,

21 v.

22 DOE 1, LINDA VISTA CHURCH;
23 DOE 2, SUPERVISORY
24 ORGANIZATION; DOE 3,
25 PERPETRATOR; and DOES 4 through
26 100, inclusive,
27 Defendants.

CASE NO. 37-2012-00099849-CU-PO-CTL

**DECLARATION OF GERRIT LÖSCH IN
SUPPORT OF MOTION TO QUASH
ORDER GRANTING PLAINTIFF'S
MOTION TO COMPEL DEPOSITION OF
GERRIT LÖSCH**

Hearing Date: TBD
Time: TBD
Dept: C-65
Judge: Joan M. Lewis
Complaint Filed: June 29, 2012
Trial Date: June 27, 2014

28 I, Gerrit Lösch, declare as follows:

1. I am over 18 years of age, of sound mind, and competent to make this Declaration.

I have personal knowledge of the matters contained herein, and they are all true and correct.

2. I provide this Declaration to support the Motion to Quash Order Granting Plaintiff's "Motion to Compel the Deposition of Gerrit Lösch and the Underlying Notice of

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By: _____ Deputy

1 Taking the Deposition of Gerrit Lösch, with Production of Documents Required – Videorecorded
2 for Use at Trial.”

3 3. If called upon to testify in this civil action, I would provide the information
4 contained in this Declaration.

5 4. I was not served with the Notice of Deposition, but I learned that Plaintiff vacated
6 the original deposition date after Watchtower objected to the Notice.

7 5. I recently learned that this Court entered an Order compelling Watchtower Bible
8 and Tract Society of New York, Inc. (sued as Doe 1; hereinafter referred to as “Watchtower”) to
9 produce me for deposition, but I have not been served with a copy of the Court’s Order.

10 6. I am a member of the ecclesiastical Governing Body of Jehovah’s Witnesses,
11 having been appointed to serve in that capacity on July 1, 1994. I was not on the Governing Body
12 in 1986 when the Plaintiff alleges he was abused by Gonzalo Campos.

13 7. The Governing Body of Jehovah’s Witnesses is the highest ecclesiastical authority
14 for the faith of Jehovah’s Witnesses, and it exercises spiritual oversight for Jehovah’s Witnesses
15 worldwide.

16 8. I am not, and never have been, a corporate officer, director, managing agent,
17 member, or employee of Watchtower. I do not direct, and have never directed, the day-to-day
18 operations of Watchtower. I do not answer to Watchtower. I do not have, and never have had,
19 any authority as an individual to make or determine corporate policy for Watchtower or any
20 department of Watchtower.

21 9. Watchtower does not have, and never has had, any authority over me.

22 10. I have no personal knowledge of any facts or circumstances concerning the subject
23 matter of this case because, among other things:

24 (a) I do not supervise or work for, and I have never supervised or worked for, the
25 Watchtower Legal Department or the U.S. Service Department.

26 (b) I did not move to live in the United States until July, 1990.

27 (c) Prior to July 1990, I resided in Austria.

28 (d) I do not know and have never met the Plaintiff, Jose Lopez.

1 (e) I do not know and have never met Leticia Lopez, the mother of Plaintiff Jose
2 Lopez.

3 (f) I do not know and have never met the Defendant, Gonzalo Campos, who is
4 sued as Doe 3.

5 11. I am a resident of the State of New York, as I live and work in Brooklyn where the
6 world headquarters of Jehovah's Witnesses is located.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct, and that this Declaration is executed this 4th day of February 2014.

9
10 Gerrit Lösch
11 Gerrit Lösch