Clerk of the Superior Court
FEB 0 5 2014

2 3 4 5 6 7 8 9 10	Megan S. Wynne, Esq., SBN 183707 Ashley A. Escudero, Esq., SBN250473 MORRIS POLICH & PURDY LLP One America Plaza 600 West Broadway, Suite 500 San Diego, California 92101 Tel: (619) 557-0404 Fax: (619) 557-0460  Donald T. Ridley, Esq. Pro Hac Vice THE MANDEL LAW FIRM 370 Lexington Avenue, Suite 505 New York, NY 10017 Tel: (212) 697-7383 Fax: (212) 681-6157  Attorneys for Gerrit Lösch		FILE D Clerk of the Superior Count 14 FEB 0 5 2014  By:Deputy
11	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
12	COUNTY OF SAN DIEGO		
13	JOSE LOPEZ, an Individual,	CASE NO. 37-2012-	00099849-CU-PO-CTL
14	Plaintiff,		F GERRIT LÖSCH IN
15		SUPPORT OF MOTION TO QUASH ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL DEPOSITION OF	
	DOE 1, LINDA VISTA CHURCH; DOE 2, SUPERVISORY	GERRIT LÖSCH	10
17	ORGANIZATION; DOE 3, PERPETRATOR; and DOES 4 through	Hearing Date: Time:	TBD TBD
18	100, inclusive,	Dept: Judge:	C-65 Joan M. Lewis
19	Defendants.	Complaint Filed:	June 29, 2012 June 27, 2014
20		Trial Date:	June 21, 2014
21		14	
22			
23	I, Gerrit Lösch, declare as follows:		
24	<ol> <li>I am over 18 years of age, of sound mind, and competent to make this Declaration.</li> </ol>		
25	I have personal knowledge of the matters contained herein, and they are all true and correct.		
26	2. I provide this Declaration to support the Motion to Quash Order Granting		
27	Plaintiff's "Motion to Compel the Deposition of Gerrit Lösch and the Underlying Notice of		
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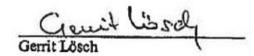
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Taking the Deposition of Gerrit Lösch, with Production of Documents Required - Videorecorded for Use at Trial."

- If called upon to testify in this civil action, I would provide the information contained in this Declaration.
- I was not served with the Notice of Deposition, but I learned that Plaintiff vacated
  the original deposition date after Watchtower objected to the Notice.
- 5. I recently learned that this Court entered an Order compelling Watchtower Bible and Tract Society of New York, Inc. (sued as Doe 1; hereinafter referred to as "Watchtower") to produce me for deposition, but I have not been served with a copy of the Court's Order.
- 6. I am a member of the ecclesiastical Governing Body of Jehovah's Witnesses, having been appointed to serve in that capacity on July 1, 1994. I was not on the Governing Body in 1986 when the Plaintiff alleges he was abused by Gonzalo Campos.
- The Governing Body of Jehovah's Witnesses is the highest ecclesiastical authority for the faith of Jehovah's Witnesses, and it exercises spiritual oversight for Jehovah's Witnesses worldwide.
- 8. I arn not, and never have been, a corporate officer, director, managing agent, member, or employee of Watchtower. I do not direct, and have never directed, the day-to-day operations of Watchtower. I do not answer to Watchtower. I do not have, and never have had, any authority as an individual to make or determine corporate policy for Watchtower or any department of Watchtower.
  - Watchtower does not have, and never has lead, any authority over me.
- 10. I have no personal knowledge of any facts or circumstances concerning the subject matter of this case because, among other things:
  - (a) I do not supervise or work for, and I have never supervised or worked for, the Watchtower Legal Department or the U.S. Service Department.
  - (b) I did not move to live in the United States until July, 1990.
  - (c) Prior to July 1990, I resided in Austria.
  - (d) I do not know and have never met the Plaintiff, Jose Lopez.

- (e) I do not know and have never met Leticia Lopez, the mother of Plaintiff Jose Lopez.
- (f) I do not know and have never met the Defendant, Gonzalo Campos, who is sued as Doe 3.
- 11. I am a resident of the State of New York, as I live and work in Brooklyn where the world headquarters of Jehovah's Witnesses is located.

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



DECLARATION OF GERRIT LOSCH