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Transaction ID 57814499
Case No. N14C-05-122 MMJ



EXHIBIT "E"

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

IN AND FOR NEW CASTLE COUNTY

STATE OF DELAWARE,

Plaintiff,

v.

LAUREL DELAWARE CONGREGATION OF
JEHOVAH'S WITNESSES, JOEL
MULCHANSINGH, and WILLIAM PERKINS

Defendants.

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CIVIL ACTION NO. N14C-05-122 MMJ

William Perkins, being duly sworn, deposes and says:

1. I was baptized as one of Jehovah's Witnesses in 1974, and I have been one of Jehovah's Witnesses ever since.

2. I have served as an elder in the Jehovah's Witnesses faith from 1990 until 1992 and from 1999 until present.

3. In keeping with the beliefs and practices of Jehovah's Witnesses, congregation members frequently share confidential information with elders seeking spiritual guidance, assistance, and direction. This is done in a private setting in the presence of at least two (2) elders.

4. On occasion, the disclosure of confidential information to the elders will result in congregation disciplinary action being taken against the congregant disclosing the information.

5. In accordance with the beliefs and practices of Jehovah's Witnesses, confidential information is kept confidential so as to uphold the elders' role as spiritual shepherds of the congregation, to maintain respect for the position of elders and congregants, and to allow congregants to feel comfortable fully disclosing information to the elders.

6. I have been an elder in the Laurel Congregation of Jehovah's Witnesses since its inception in September 2011.

7. During January 2013, Joel Mulchansingh, also an elder in the Laurel Congregation, and I spoke to T.H., a 15-year-old minor who had already accepted all the primary tenets of the Jehovah's Witness faith so as to be baptized, regarding some confidential matters. T.H. was seeking spiritual advice and counsel from us as elders in a private setting.

8. During January 2013, Joel Mulchansingh and I also spoke to Katheryn (Kate Harris) Carmean-White regarding some confidential matters. Ms. Carmean-White was seeking spiritual advice and counsel from us as elders in a private setting.

9. In February 2013, both Ms. Carmean-White and T.H. were disfellowshipped (excommunicated) from the Laurel Congregation.

Dated: 9/2/15



William Perkins

SWORN TO AND SUBSCRIBED before me the day and year aforesaid.

JENNIFER LLOYD DILL
NOTARY PUBLIC
STATE OF DELAWARE
MY COMMISSION EXPIRES ON
May 11, 2016



NOTARY PUBLIC

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

STATE OF DELAWARE,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO. N14C-05-122 MMJ
v.	:	
	:	
LAUREL DELAWARE CONGREGATION OF	:	
JEHOVAH'S WITNESSES, JOEL	:	
MULCHANSINGH, and WILLIAM PERKINS	:	
	:	
Defendants.	:	

Joel Mulchansingh being duly sworn, deposes and says:

1. I was baptized as one of Jehovah's Witnesses in 1976, and I have been one of Jehovah's Witnesses ever since.
2. I served as an elder in the Jehovah's Witnesses faith from 1991 until 2003 and from 2005 until July 2013.
3. In keeping with the beliefs and practices of Jehovah's Witnesses, congregation members frequently share confidential information with elders seeking spiritual guidance, assistance, and direction. This is done in a private setting in the presence of at least two (2) elders.
4. On occasion, the disclosure of confidential information to the elders will result in congregation disciplinary action being taken against the congregant disclosing the information.
5. In accordance with the beliefs and practices of Jehovah's Witnesses, confidential information is kept confidential so as to uphold the elders' role as spiritual shepherds of the congregation, to maintain respect for the position of elders and congregants, and to allow congregants to feel comfortable fully disclosing information to the elders.

6. I was an elder in the Laurel Congregation of Jehovah's Witnesses from its inception in September 2011 until July 2013, when I moved to a congregation of Jehovah's Witnesses in Maryland.

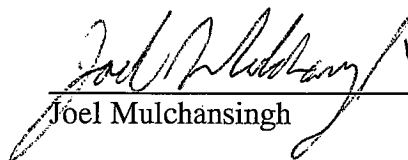
7. During January 2013, William Perkins, also an elder in the Laurel Congregation, and I spoke to T.H., a 15-year-old minor who had already accepted all the primary tenets of the Jehovah's Witness faith so as to baptized, regarding some confidential matters. T.H. was seeking spiritual advice and counsel from us as elders in a private setting.

8. During January 2013, William Perkins and I also spoke to Katheryn (Kate Harris) Carmean-White regarding some confidential matters. Ms. Carmean-White was seeking spiritual advice and counsel from us as elders in a private setting.

9. In February 2013 both Ms. Carmean-White and T.H. were disfellowshipped (excommunicated) from the Laurel Congregation.

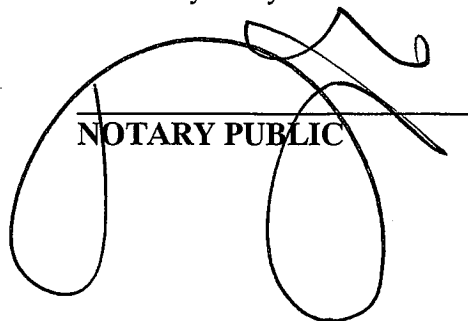
Dated: _____

9/2/15


Joel Mulchansingh

SWORN TO AND SUBSCRIBED before me the day and year aforesaid.




NOTARY PUBLIC