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1
        IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
                 IN AND FOR THE COUNTY OF KING
 2
     L.M. and O.M.
 3
                 Plaintiffs,
                                    NO. 11-2-18616-4 SEA
 4
          v.
 5
     BOY SCOUTS OF AMERICA, )
 6
     et al.,
 7
                 Defendants.
 8
 9
10
                 VIDEOTAPED ORAL DEPOSITION OF
11
                           JAMES TERRY
12
                           MAY 21, 2013
13
14
15
              ORAL DEPOSITION OF JAMES TERRY, produced as
16
     a witness duly sworn by me at the instance of the
17
     Plaintiffs, was taken in the above styled and
18
     numbered cause on the 21st day of May, A.D., 2013
     from 9:20 a.m. to 11:28 a.m., before Kellie L.
19
2.0
     Rowbotham, CSR in and for the State of Texas,
21
     reported by stenographic means, at the Dallas
22
     Marriott Las Colinas, located at 233 W. Las Colinas
23
     Blvd., Irving, Texas 75039, pursuant to the
24
     Washington Rules of Civil Procedure and the
25
     provisions stated on the record or attached hereto.
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1	A Yes, we did.
2	Q And can you tell me what those documents
3	were, please?
4	A We began the handbook insert.
5	Q Okay. And what year was the
6	A That may have been after this period of
7	time, though, Mr. Mones.
8	Q Okay. Am I correct that the handbook insert
9	may have started around 1988 or 1989? Is that
10	correct?
11	A I think it was 1988. It was right after
12	this period.
13	Q Okay. <mark>So before 1987 then, did the Boy</mark>
14	Scouts of America publish any documents
15	that specifically warned or advised parents about the
16	sexual abuse of Scouts by adult leaders or
17	volunteers?
18	A Not that I recall offhand.
19	Q Okay. And in the you said in the Boy
20	Scout Handbook. Would that have been the insert that
21	goes at the beginning of the handbook, the Boy Scout
22	Handbook you were referring to in your earlier
23	answer?
24	A Yes, sir, but also in each of the Cub Scout

