

Exhibit 52

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CIVIL PART
HUDSON COUNTY
DOCKET NO. HUD-L-5473-12
APP. DIV. NO. _____

MICHAEL FERGUSON, et al.,	:	
	:	TRANSCRIPT
Plaintiffs,	:	
vs.	:	OF
	:	
JONAH, ARTHUR GOLDBERG, ALAN	:	TRIAL
DOWNING and ALAN DOWNING LIFE	:	
COACHING, L.L.C.,	:	
	:	
Defendants.	:	
	:	

Place: Hudson County Superior Court
Administration Building
595 Newark Avenue
Jersey City, N.J. 07306

Date: June 8, 2015
Volume 1 of 2
Pages 1 - 200

B E F O R E:

HONORABLE PETER F. BARISO, JR., A.J.S.C.,
And a Jury.

TRANSCRIPT ORDERED BY:

JODI ERICKSON, ESQ.,
(Cleary, Gottlieb, Steen & Hamilton, L.L.P.)

Audio Recorded by: C. Ortiz

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METRO TRANSCRIPTS, L.L.C.

Mary Nelson

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1 Q You created the JONAH Institute in 2007
2 because you wanted to attract more secular, meaning
3 non-religious clients, right?

4 A We wanted to attract those who were not
5 necessarily of the Jewish faith. And that was created
6 as a division JONAH, the parent organization.

7 Q And you created the institute because you
8 wanted your program to sound scientific. Isn't that
9 right?

10 A No, we've all -- the fundamental basis of our, of
11 our organization always is God-based, Torah-based.
12 That is the perspective and the underlying assumption
13 of everything. We do try to integrate and synthesize
14 scientific material into the religious doctrines.

15 Q Isn't it true, Mr. Goldberg, that the JONAH
16 Institute doesn't really exist because it's just a
17 label?

18 A I think that's an overstatement. It is a division
19 of JONAH and functions and does have a separate website
20 of sorts. And it's, it's an idea that we had to try to
21 really reach out in a broader capacity, but it frankly
22 never really worked very well. So yeah, it's still
23 there, but it's, it's not something that is used a lot.
24 But yes, it is certainly -- and it still exists,
25 absolutely.

1 Q Do you remember being asked at your
2 deposition, question, it's just a label and responding
3 correct?

4 A Okay. I'll accept that.

5 MS. BENSMAN: Permission to show joint
6 exhibit 62.

7 THE COURT: Okay.

8 MS. BENSMAN: If we could zoom in on that.

9 Thank you.

10 Q So here it says under the caption JONAH
11 Institute of Gender Affirmation, it says: "In 2007
12 JONAH established a separate division, the JONAH
13 Institute for Gender Affirmation, to provide research
14 and critical strategies for growth out of
15 homosexuality", right?

16 A Yes, ma'am.

17 Q And that's from JONAH home page?

18 A Presumably so. I'm assuming that's correct.

19 Q Do you see the word "separate" there?

20 A Yes.

21 Q In the first line?

22 A Yes.

23 Q Okay. In fact isn't it true that the JONAH
24 Institute has no separate life from JONAH?

25 A The word is "division". A division means that

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1 it's part of a parent organization. So it, it is
2 certainly an integral part of JONAH, yes.

3 Q But isn't it true that there's nothing
4 separate or different about it?

5 A I'm not sure I agree with that characterization.
6 It has some -- it does have some different aspects.
7 But yeah, okay. I'll, I'll accept what you're saying.

8 Q Do you recall being asked at your deposition,
9 question, would it be accurate to say that it has no
10 separate life from JONAH and responding correct?

11 A That's what I just said now.

12 Q There's no separate JONAH Institute office,
13 right?

14 A That is correct, for sure.

15 Q There are no JONAH Institute employees,
16 right?

17 A There are no JONAH Institute employees, nor are
18 there any JONAH employees. They're all independent
19 contractors.

20 Q The JONAH Institute doesn't file taxes,
21 right?

22 A No, ma'am.

23 MS. BENSMAN: You can put that away.

24 Permission to show plaintiffs' 414.

25 THE COURT: Any objection?

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1 MR. LI MANDRI: No objection.

2 THE COURT: Okay.

3 Q This is a brochure for the JONAH Institute,
4 right?

5 A Yes, ma'am.

6 Q The phone number on front, that's the JONAH
7 phone number, right?

8 A Yes, ma'am, that is correct.

9 Q The same one that we saw in the newspaper ad?

10 A That is correct.

11 Q Is that the phone that rings on your desk?

12 A Among other places, that is correct, yes.

13 Q Let's look at the second page of this
14 brochure. Do you see the column on the left?

15 A Yes, ma'am.

16 Q And it says there that the JONAH Institute
17 for Gender Affirmation is a worldwide non-
18 denominational, full-service clinical and research
19 center, right?

20 A Yes, ma'am.

21 Q And the words "research" and "clinical" were
22 also used in the JONAH website text we just looked at a
23 moment ago, right?

24 A That is correct.

25 Q Let's start with "research center". The