

EXHIBIT U

MONTANA FOURTH JUDICIAL DISTRICT COURT
MISSOULA COUNTY

THE SECOND INTERNATIONAL
BAHA'I COUNCIL [sic],

Plaintiffs,

-vs-

NEAL CHASE,

Defendant.

COPY

Cause No. DV-02-410

Taken at 202 W. Spruce Street
Missoula, Montana
Tuesday, March 18, 2003 - 9:20 a.m.

D E P O S I T I O N
OF
CARLOTTA GEESEN

A P P E A R A N C E S

MICHAEL SOL, Esq., of Sol & Wolfe Law Firm, 100
Montana Building, 101 E. Broadway, Missoula,
Montana 59802,
appearing on behalf of the Plaintiffs,

CYNTHIA K. SMITH, Esq., of The Smith Law Offices,
202 W. Spruce Street, P.O. Box 7785, Missoula,
Montana 59807-7785,
appearing on behalf of the Defendant.

Also present: Neal Chase

Reported by Kerry Fremerman, RPR, 1015 Mount
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(406) 721-1143, Freelance Court Reporter for the
State of Montana, residing in Missoula, Montana.

1 So this was the two-part criteria of
2 the individuals who were left that Mason had
3 named as potential guardians, and whichever of
4 those individuals filled that two-part criteria.
5 And the having a medallion, which was kind of
6 another clue, you know. So it wasn't just the
7 fact that Pepe Remy actually had that medallion
8 in his possession, but it was the fact that he
9 fulfilled the two-part criteria.

10 Q. So he was the legally adopted son of
11 Mason?

12 A. Yes.

13 Q. How was he appointed? Just because he
14 had the medallion?

15 A. Because he had the medallion.

16 Q. Was there any written document that
17 said: You are the new guardian, like something
18 in writing?

19 A. No.

20 Q. And how did people first know that Pepe
21 was the son of -- the new guardian?

22 A. I was a Baha'i before Mason Remy
23 passed away, and I had written to Mason Remy and
24 declared my belief, and Mason was probably 99
25 years old at that time. Pepe, who had lived with