

James P. Molloy
GALLIK, BREMER & MOLLOY, P.C.
777 E. Main Street, Suite 203
PO Box 70
Bozeman, MT 59771-0070
Ph: (406) 404-1728
Fax: (406) 404-1730
jim@galliklawfirm.com

Neil Smith - (*Pro Hac Vice*)
Ross Leonoudakis - (*Pro Hac Vice*)
NIX, PATTERSON & ROACH, LLP
1845 Woodall Rodgers Fwy., Suite 1050
Dallas, Texas 75201
Ph: (972) 831-1188
Fax: (972) 444-0716
dneilsmith@me.com
RossL@nixlaw.com
Attorneys for Plaintiffs

FILED Aug. 30 2018
Candace Fisher
SANDERS COUNTY CLERK OF DISTRICT COURT
BY [Signature]
DEPUTY

**MONTANA TWENTIETH JUDICIAL DISTRICT COURT
SANDERS COUNTY**

ALEXIS NUNEZ and
HOLLY McGOWAN,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT SOCIETY OF
NEW YORK, INC.; WATCHTOWER BIBLE AND
TRACT SOCIETY OF PENNSYLVANIA, INC.;
CHRISTIAN CONGREGATION OF JEHOVAH'S
WITNESSES, and THOMPSON FALLS
CONGREGATION OF JEHOVAH'S WITNESSES,

Defendants/Third-Party Plaintiffs,

vs.

MAXIMO NAVA REYES,

Third-Party Defendant.

Cause No. DV 16-84
Hon James A. Manley

**Reply Re: Motion to Enforce Stipulation
and Challenge to Confidential Designation**

Defendants twice stipulated that the documents at issue are not confidential. Defendants haven't cited to a single page in these documents with confidential information.

Defendants incorrectly argue that the Court has required the documents be marked as confidential. The Court issued no such requirement.

The documents do not contain confidential information. The documents were publicly filed in other cases. Defendants have redacted names from the documents. Most importantly, Defendants offered no proof of any confidential information in response to Plaintiffs' motion, because there is no confidential information.

The matters in the documents are very important. The affidavits make statements that directly contradict the affidavits and testimony submitted in this case.

Plaintiffs intend to use these documents at trial and will be made public when submitted into evidence. Therefore, this issue must be addressed.

DATED: This 27th day of August, 2018

Attorney for Plaintiffs:

By:

Neil Smith

NIX, PATTERSON & ROACH, LLP
1845 Woodall Rodgers Fwy., Suite 1050
Dallas, Texas 75201
Ph: (972) 831-1188
Fax: (972) 444-0716
neilsmith@nixlaw.com
RossL@nixlaw.com

GALLIK, BREMER & MOLLOY P.C.
777 E. Main St., Suite 203
Bozeman, MT 59771-0070
Telephone: (406) 404-1728
Facsimile: (406) 404-1730
jim@galliklawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served upon all attorneys of record via Email on this the 27th day of August, 2018.

Kathleen L. DeSoto
Tessa A. Keller
Garlington, Lohn & Robinson, PLLP
PO Box 7909
Missoula MT 59807-7909
523-2500
kldesoto@garlington.com
takeller@garlington.com

Joel M. Taylor
Associate General Counsel
Watchtower Bible and Tract Society of New York, Inc.
100 Watchtower Drive
Patterson NY 12563
845-306-1000
jmtaylor@jw.org

Matthew A. McKeon
McKeon Law Firm, PLLC
257 W. Front St, Suite A
Missoula MT 59802
matthew@mckeaonlawoffice.com

Maximo Reyes
PO Box 566
Plains MT 59859-0566

First class mail postage prepaid

D. N. S. A.

Neil Smith