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Candace Fisher
SANDERS COUNTY CLERK OF DISTRICT COURT
BY [Signature]
DEPUTY

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MONTANA TWENTIETH JUDICIAL DISTRICT COURT, SANDERS COUNTY

ALEXIS NUNEZ and HOLLY
McGOWAN,

Plaintiffs,

v.

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.

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

RELIGIOUS DEFENDANTS' MOTION
FOR CLARIFICATION OF COURT'S
APRIL 5, 2018 ORDER

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

Third-Party Plaintiffs,

v.

MAXIMO NAVA REYES, MARCO
NUNEZ, IVY McGOWAN-
CASTLEBERRY,

Third-Party Defendants.

Defendants/Third-Party Plaintiffs Watchtower Bible and Tract Society of New York, Inc. ("Watchtower NY"), Christian Congregation of Jehovah's Witnesses ("CCJW") and the Thompson Falls Congregation of Jehovah's Witnesses ("Thompson Falls Congregation") (collectively "Religious Defendants") respectfully request clarification of the Court's April 5, 2018 Order on Plaintiffs' Motion to Compel ("Order"), in which it granted in part and denied in part Plaintiffs' Motion to Compel.

In its Order, the Court compelled production of a number of documents that were provided to the Service Department, including: S-77 Notification of Disfellowship Form, Glenn Wilson Handwritten notes, Elders' Response to Service Department Letter, and any documents sent or maintained related to the accusations, investigations, judicial committees, disfellowship and reinstatement of Max Reyes related to the sexual abuse.

The Court also compelled witness testimony on any communications between the Thompson Falls Congregation and the Service Department related to those same issues.

See Order Pl's Mot. Compel Disc. at 2 Apr. 5, 2018 ("Order").

However, the Court also sustained the objections of Religious Defendants to discovery and testimony "related to communications between Max Reyes and the Elders of Thompson Falls Congregation related to the accusations, investigations, judicial committee, disfellowship, or reinstatement of Max Reyes, related to the sexual abuse of children." Order at 2.

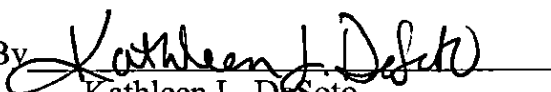
The contents of the first category of documents and testimony which the Religious Defendants have been ordered to produce are comprised of the contents of the second category, which the Court has ordered protected. In other words, the documents compelled consist of the substance of the communications between Max Reyes and the Elders which the Court has ordered protected.

Religious Defendants respectfully request an expedited clarification of the Court's Order so that it may comply prior to corporate representative depositions currently set for April 24 and 25, 2018. If it is helpful to the Court, Religious Defendants can provide complete unredacted copies for the Court to review.

DATED this 17th day of April, 2018.

Attorneys for Religious Defendants/Third-Party
Plaintiffs:

GARLINGTON, LOHN & ROBINSON, PLLP

By 
Kathleen L. DeSoto

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2018, a copy of the foregoing document was served on the following persons by the following means:

_____ Hand Delivery
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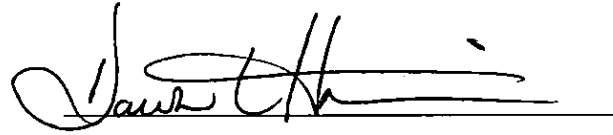
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4. COURTESY COPY TO:
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A handwritten signature in black ink, appearing to read "James A. Manley", written over a horizontal line.