

Guy W. Rogers
Jon A. Wilson
Aaron M. Dunn
BROWN LAW FIRM, P.C.
315 North 24th Street
P.O. Drawer 849
Billings, MT 59103-0849
Tel. (406) 248-2611
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)
MILLER MCNAMARA & TAYLOR LLP
100 South Bedford Road, Suite 340
Mount Kisco, New York 10549
Tel./E-Fax (845) 288-0844
*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,
and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-52-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S RESPONSES
TO PLAINTIFFS' FIRST SET OF
JURISDICTIONAL DISCOVERY**

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE SCHULZE,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, and BRUCE MAPLEY SR.,

Defendants.

Cause No. CV 20-59-BLG-SPW

DEFENDANT WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA'S RESPONSES TO PLAINTIFFS' FIRST SET OF JURISDICTIONAL DISCOVERY

TO: Plaintiffs and their counsel, Robert L. Stepans, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"), by and through its attorneys, and responds to Plaintiffs' First Set of Jurisdictional Discovery as follows:

REQUEST FOR PRODUCTION NO. 23: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by any member of the Jehovah's Witnesses' local Hardin, Montana congregation between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 24: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by any member of any Jehovah's Witnesses congregation in Montana between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 25: Please produce a copy of the Kingdom Ministry School Course (or if called something different at any time, all substantially similar documents) you published in 1972 to train congregational elders.

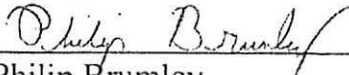
RESPONSE: *See* documents produced herewith as WTPA000001-WTPA000136.

DATED this 20th day of November, 2020.

By: Jon A. Wilson
Guy W. Rogers / Jon A. Wilson /
Aaron M. Dunn
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*

VERIFICATION

Philip Brumley states that he has read the foregoing (*Defendant WTPA's Responses to Plaintiffs' First Set of Jurisdictional Discovery*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.



Philip Brumley

Dated: November 16, 2020

CERTIFICATE OF SERVICE

I hereby certify that, on November 20th, 2020, a copy of the foregoing
(Defendant WTPA's Responses to Plaintiffs' First Set of Jurisdictional Discovery)
was served on the following person(s):

1. U.S. District Court, Billings Division

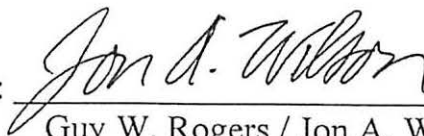
2. Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
Missoula, MT 59802

3. Bruce G. Mapley Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

_____ CM/ECF	_____ Fax
_____ Hand Delivery	_____ E-Mail
<u>2-3</u> _____ U.S. Mail	_____ Overnight Delivery Services

By: _____



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