

Exhibit B

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Attorneys for Plaintiff

**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,)

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
Cross Claimant,)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

Case No. CV-20-52-BLG-SPW

**DECLARATION OF
RYAN R. SHAFFER**

_____)

ARIANE ROWLAND, and JAMIE)	
SCHULZE)	Cause No. CV 20-59-BLG-SPW
)	
Plaintiff,)	
vs.)	
)	
WATCHTOWER BIBLE AND TRACT)	
SOCIETY OF NEW YORK, INC., and)	
WATCH TOWER BIBLE AND TRACT)	
SOCIETY OF PENNSYLVANIA,)	
)	
Defendants.)	
)	

I, Ryan R. Shaffer, an attorney duly admitted to practice law in this Court, declares that the following is true and correct:

1. I submit this Declaration in support of Plaintiffs’ Financial Affidavit regarding the fees and costs expended litigating Watch Tower Bible and Tract Society of Pennsylvania’s (“WTPA”) Motion to Dismiss. Motion to Dismiss and Brief in Support (CV 20-52-BLG-SPW Doc. 13 & 14; CV-20-59-BLG-SPW-TJC Doc 9 &10) (referred to herein as “WTPA’s Motion”).

2. I am a Partner in the law firm of Meyer, Shaffer & Stepan and represent Plaintiffs in this matter.

3. I am admitted to practice law in the state and Federal courts of Montana, Wyoming, and North Dakota and have been practicing law since 2006.

4. My firm represents victims of sexual abuse and harassment on a contingency fee basis.
5. In circumstances where my firm represents clients on an hourly fee basis, my ordinary and customary rate is \$300/hour.
6. I personally prepared the itemization of my time spent litigating WTPA's Motion, which is attached as **Exhibit 1**.
7. With exception of entries between 8/31/2021 and 9/8/2021, I did not keep contemporaneous records of the time I expended litigating WTPA's Motion.
8. Therefore, I reconstructed the time I expended by reviewing:
 - a. My calendar.
 - b. The complete discovery served and answered pertaining to the WTPA's Motion.
 - c. The record of correspondence between counsel pertaining to litigation over WTPA's Motion.
 - d. The pleadings filed with the Court pertaining to WTPA's Motion
 - e. The record of Jehovah's Witness documents assigned to me to review and summarize for responding to WTPA's Motion (a spreadsheet identifying these documents is attached as **Exhibit 2**).

f. The billing and attendance records of video and telephone conferences I attended that pertained to litigation over WTPA's Motion.

9. Because most of my billing entries were not created contemporaneously, I endeavored to make sure that all entries were conservative by erring on the side of entering less time than I actually expended for each entry.

10. Based on my sixteen (16) years of experience litigating contested civil matters, I know approximately how long it takes to draft and edit briefs, draft and edit discovery and related correspondence, and review evidence produced in discovery and I therefore followed the following guidelines in entering itemizations of my time:

- a. I know that one page of well-researched and well-edited briefing typically requires one hour of work, and therefore a 20-page brief would typically require twenty (20) hours of work.
- b. I know that one page of edited, written discovery requests typically requires half an hour of work, and therefore 20 pages of written discovery would typically require ten (10) hours of work.
- c. Careful review of incoming orders, pleadings, correspondence, and discovery takes approximately three minutes per page.

d. Review of evidence produced in discovery takes approximately one minute per page.

11. When making time entries based on the guidelines referenced above I rounded down to ensure that my entries did not overstate the actual time required for each task.

12. I know that countless emails, meetings, phone calls, and discussions with co-counsel and staff that resulted from litigating WTPA's Motion were left out of my itemization of time because I had no reliable way to estimate or document those hours.

13. I know that countless hours of reviewing the voluminous evidence obtained during discovery resulting from WTPA's Motion was left out of my itemization because I had no reliable way to estimate or document those hours.

14. A conservative estimate for the time I expended litigating WTPA's Motion that is not included in my itemization, and therefore not being claimed by Plaintiffs, is at fifty (50) hours.

15. For the foregoing reasons, I affirm and certify that the attached itemization of my time expended litigating WTPA's Motion is a very conservative reflection of the actual time and effort that was expended.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 20th day of September, 2021.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

Exhibit 1

RYAN SHAFFER TIME ENTRIES RE: HANDLING WTPA MOTION TO DISMISS ON PERSONAL JURISDICTION									
	Date	Event	Review of Incoming Doc	Legal Research re: Doc	Drafting Outgoing Doc.	Editing / Finalizing Outgoing Doc.	Teams Meetings / Conf. Calls	Travel Time (50% of hourly billing rate)	Time in Court or Depo
1	6/22/2020	WTPA Motion to Dismiss and Brief	1						
2	7/9/2020	Attorney meeting re: Motion to dismiss and joint discovery plan					0.8		
3	7/13/2020	Response brief to WTPA's Motion to Dismiss ("MTD") Pursuant to Rule 12(b)(2)			18	0.5			
4	~7/13/2020 – ~3/20/2021	Review of Jehovah's Witness documents obtained from Defendants and Third Parties re: WTPA's role in the church and contacts with Montana	8.3 (615 pages)						
5	8/5/2020	Motion to supplement the record re: MTD			0.5				
6	8/5/2020	Brief in support of Motion to supplement the record re: MTD			0.7	0.5			
7	8/14/2020	WTPA's brief in opposition to Motion to supplement the record re: MTD	0.5						
8	8/18/2020	Order re: Jurisdictional discovery	0.3						
9	9/23/2020	Joint JD discovery plan			1.5				
10	10/8/2020	Attorney meeting re: document and information management; scope of jurisdictional discovery; 1st round of jurisdictional discovery to WTPA					1.1		
11	10/14/2020	First jurisdictional discovery to WTPA				0.5			
12	10/14/2020	Order re: jurisdictional discovery scheduling	0.1						
13	10/19/2020	Brief re: scope of jurisdictional discovery			10	0.5			
14	11/11/2020	Attorney meeting re: protective order; motion to conduct discovery on Mapley/WTNY; 2nd jurisdictional discovery to WTPA and 1st to WTNY					1		
15	11/17/2020	Second jurisdictional discovery to WTPA				0.5			
16	11/17/2020	First jurisdictional discovery to WTNY				0.5			
17	11/20/2020	WTPA's responses to first jurisdictional discovery	0.5						
18	11/30/2020	Order re: scope of jurisdictional discovery	0.2						
19	12/15/2020	Letter from Wilson re: supp. discovery and elder interviews	0.1						
20	12/15/2020	WTPA's first supp. responses to first jurisdictional discovery	0.5						
21	12/17/2020	Attorney meeting re: finalizing SDT to Hardin Congregation; additional jurisdictional discovery to WTPA/WTNY; documents/correspondence received from WTPA					1.7		
22	12/17/2020	Subpoena duces tecum to hardin congregation			1				
23	12/22/2020	Attorney meeting with consultant re: WTPA's role in the church					3		
24	12/22/2020	Letter to Wilson re: elder interviews			0.5				
25	12/28/2020	Letter from Funyak re: subpoena duces tecum to hardin congregation	0.1						
26	12/29/2020	WTPA's responses to second jurisdictional discovery	0.5						

27	12/29/2020	WTNY's responses to first jurisdictional discovery	0.5						
28	1/5/2021	Attorney meeting with consultant re: WTPA's role in the church						2.5	
29	1/5/2021	Scrutinizing Defs' Disc answers	1						
30	1/5/2021	Letter to Funyak re: Funyak's purported	0.4						
31	1/6/2021	Attorney Meeting re: Hardin Congregation Subpoena						1.1	
32	1/7/2021	Letter from Funyak re: subpoena duces tecum to	0.1						
33	1/11/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation							
34	1/15/2021	WTPA's first supp. responses to second jurisdictional discovery	0.5						
35	1/15/2021	Attorney meetign re: documents received from WTPA, disocvery disputes, serving additional discovery before 1/25 deadline, legal research on personal jurisdiction						0.4	
36	1/18/2021	Reviewing and editing James' letter to defense counsel					1		
37	1/19/2021	Letter from Funyak re: Subpoena duces tecum to hardin congregation + scope of representation	0.1						
38	1/19/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation + scope of representation	0.2						
39	1/19/2021	Letter to Wilson re: WTPA's jurisdictional discovery responses					0.5		
40	1/20/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation + scope of representation				0.8			
41	1/22/2021	Letter from Funyak re: Subpoena duces tecum to hardin congregation + scope of representation	0.2						
42	1/22/2021	Letter from Wilson re: WTPA's discovery responses	0.5						
43	1/25/2021	Third jurisdictional discovery to WTPA				5			
44	1/25/2021	Second jurisdictional discovery to WTNY				4			
45	1/26/2021	Final review editing Letter to Wilson re: WTPA's jurisdictional discovery responses					0.5		
46	1/26/2021	Letter to Wilson re: WTNY's jurisdictional discovery responses				0.7			
47	1/28/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation.				0.1			
48	2/2/2021	Letter from Funyak re: subpoena duces tecum to hardin congregation	0.1						
49	2/3/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation				0.3			
50	2/11/2021	Attorney Meeting re: Hardin Congregation Subpoena and ongoing Jurisdictional Discovery						1	
51	2/12/2021	Letter from Wilson re: WTPA and WTNY discovery responses	0.5						
52	2/26/2021	Joint motion to amend jurisdictional discovery scheduling order	0.3						
53	3/8/2021	Email to Aaron Dunn re Int. No. 6				0.2			
54	3/8/2021	Email to Wilson re: WTNY's jurisdictional discovery responses							
55	3/8/2021	Review Discover Responses from Defendants	1						
56	3/9/2022	Review Dunn email and discuss with james	0.1						
57	3/10/2021	Letter to Wilson re: WTPA's and WTNY's jurisdictional discovery responses					0.6		
58	3/16/2021	Letter from Wilson re: deposition of WTPA	0.3						
59	3/22/2021	2 letters from Wilson re: WTPA's and WTNY's jurisdictional discovery responses	0.7						
60	3/22/2021	WTPA's second supp. re: responses to first jurisdictional discovery	0.1						

61	3/23/2021	Attorney meeting re: discovery disputes						1.1	
62	3/26/2021	Letter to Wilson re: WTPA's and WTNY's jurisdictional discovery responses				1			
63	3/26/2021	Motion for status conference			0.5				
64	3/29/2021	Telephone call with Defense re: discovery						1	
65	3/30/2021	Letter to Funiyak re: Subpoena duces tecum to hardin congregation			0.7				
66	3/31/2021	WTNY's first supp. responses to first jurisdictional discovery	0.1						
67	4/2/2021	Attorney meeting re: discovery disputes						1.1	
68	4/7/2021	Letter from Funiyak re: Subpoena duces tecum to hardin congregation	0.1						
69	4/8/2021	Letter to Wilson re: WTPA's and WTNY's jurisdictional discovery responses							
70	4/8/2021	Letter from Wilson re: WTPA's and WTNY's jurisdictional discovery responses	1						
71	4/9/2021	Notice of written disco and assoc. conferral efforts			0.7				
72	4/9/2021	Letter to Wilson re: WTPA's and WTNY's jurisdictional discovery responses and jurisdictional depositions			0.3				
73	4/12/2021	Letter to James Rowland re: documents for deposition							
74	4/13/2021	Order re: deadline for completion of jurisdictional depositions	0.1						
75	4/19/2021	Letter to James Rowland re: upcoming deposition							
76	4/19/2021	WTNY's second supp. responses to first jurisdictional discovery	0.2						
77	4/19/2021	WTPA's second supp. responses to third jurisdictional discovery	0.1						
78	4/20/2021	Motion to compel jurisdictional discovery			0.5				
79	4/20/2021	Brief re: Motion to compel jurisdictional discovery			6.5				
80	4/21/2021	Motion to compel Hardin Congregation subpoena duces tecum			0.5				
81	4/21/2021	Brief re: Motion to compel Hardin Congregation subpoena duces tecum			8				
82	4/23/2021	Deposition of James Rowland	5 (Depo prep)					10	7
83	4/28/2021	Letter from Funiyak re: Motion to compel	0.2						
84	5/4/2021	Hardin Congregation's motion and brief to permissively intervene	0.3						
85	5/5/2021	Order re: Hardin Congregation's motion and brief to permissively intervene	0.1						
86	5/5/2021	Hardin Congregation's response to motion to compel subpoena duces tecum	0.5						
87	5/11/2021	WTPA and WTNY's response to motion to compel jurisdictional discovery	0.7						
88	5/12/2021	WTPA and WTNY's joinder in hardin congregation's opposition to motion to compel	0.1						
89	5/14/2021	Reply brief re: Motion to compel Hardin Congregation subpoena duces tecum	0.3						
90	5/20/2021	WTPA's third supp. responses to third jurisdictional discovery	0.3						
91	5/20/2021	Attorney meeting re: motions to compel + upcoming oral arguments						1.1	
92	5/25/2021	Reply brief re: Motion to compel jurisdictional discovery			3				

93	6/2/2021	Oral argument re: Motion to compel Hardin Congregation subpoena duces tecum						10	1
94	6/15/2021	Attorney meeting re: motions to compel + upcoming oral arguments					1.3		
95	6/17/2021	Mock hearing re: motion to compel jurisdictional discovery					1.7		
96	6/23/2021	Oral argument re: Motion to compel jurisdictional discovery						10	1.2
97	6/30/2021	Order re: Motion to compel Hardin Congregation subpoena duces tecum	0.5						
98	7/30/2021	Order re: Motion to compel Hardin Congregation subpoena duces tecum							
99	8/3/2021	Letter to Funyak re: subpoena duces tecum documents			0.1				
100	8/10/2021	Attorney meeting re: documents relevant to personal jurisdiction					2.3		
101	8/11/2021	Letter to Funyak re: redaction of subpoena duces tecum documents			0.5				
102	8/12/2021	Letter from Funyak re: redaction of subpoena duces tecum documents	0.1						
103	8/12/2021	Hardin Congregation's request for clarification	0.1						
104	8/16/2021	Notice of Docs. Refernced by hardin congregation			0.3				
105	8/24/2021	Order re: motion to compel jurisdictional discovery	0.3						
106	8/26/2021	Attorney meeting re: documents relevant to personal jurisdiction and forthcoming response to MTD					1.3		
107	8/27/2021	Letter to Wilson/Taylor re: impropriety of MTD			0.8				
108	8/30/2021	Order re: redaction of subpoena duces tecum documents	0.1						
109	8/31/2021	Review my time spent pursuing motion to compel calculating amount of time spent on discovery issues we prevailed on, discussing best way to parse out time we did not prevail on.						1	
110	9/1/2021	Calculating amount of time spent on discovery issues we prevailed on, discussing best way to parse out time we did not prevail on.						1.1	
111	9/2/2021	Compiling my time on each step of prevailing on motion to compel						0.6	
112	9/2/2021	Letter from Wilson re: impropriety of MTD	0.2						
113	9/2/2021	Attorney meeting to discuss affidavit of fees and costs on Motion to Compel, review of Watchtower financial documents, Brumley depo., SDT to Hardin.						0.8	
114	9/3/2021	Letter from Funyak w/ unredacted subpoena duces tecum documents	0.1						
115	9/9/2021	Statement of attorney fees and costs re: motion to compel			1.5			3	
116	9/14/2021	Motion for scheduling order re: remainder of jurisdictional phase of case			0.8				
117	9/15/2021	Order granting motion for scheduling order	0.1						
118	9/21/2021	Stipulation for taking of remote depositions			1.2				
119	9/21/2021	WTPA's third supp. re: responses to first jurisdictional discovery	0.3						
120	9/21/2021	WTPA's second supp. responses to second jurisdictional discovery	1.5						
121	9/21/2021	WTNY's third supp. responses to first jurisdictional discovery	0.7						
122	9/21/2021	WTPA's fourth supp. responses to third jurisdictional discovery	1.7						

123	10/18/2021	Attorney meeting to discuss personal jurisdiction brief and potential Rule 11 letter					1.2			
124	10/25/2021	Letters to Wilson, Taylor with Rule 11 motion/brief attached			2	0.5				
125	11/5/2021	WTPA's notice of withdrawal of MTD	0.1							
126	11/5/2021	Notice re: WTPA's withdrawal of MTD			1	0.5				
127	11/5/2021	Response brief to WTPA's MTD			27	1				
128	12/3/2021	Motion for sanctions			0.8					
129	12/3/2021	Brief re: Motion for sanctions		2.5	14	0.5				
130	1/10/2022	Reply brief re: Motion for sanctions		1	10	0.5				
131	3/16/2021	Mock hearing re: motion for sanctions					1.8			
132	4/5/2022	Oral argument re: Motion for sanctions						10	1.3	
133	9/15/2022	Itemizing time expended litigating WTPA Motion to Dismiss				2				
134	9/16/2022	Itemizing time expended litigating WTPA Motion to Dismiss				4				
	Time Totals		20.3	3.5	130	15.3	27.3	40	10.5	
	Hourly Rate		\$300	\$300	\$300	\$300	\$300	\$150	\$300	
	Total Fee		\$6,090	\$1,050	\$39,000	\$4,590	\$8,190	\$6,000	\$3,150	
									Grand Total	\$68,070

Exhibit 2

PRODUCED BY/ BATES PREFIX	BATES NUMBER	DOCUMENT DATE	DOCUMENT DESCRIPTION	RVW ATTORNEY
CAEKAERT/MAPLEY	000349-000353	1989, 1992 & 1993	1989, 1992, 1993 Child Abuse Telememo Form	RYAN
CAEKAERT/MAPLEY	000354-000355	5/24/2002	2002-05-24 Letter from Christian Congregation of the Jehovah's Witnesses to all church members	RYAN
CAEKAERT/MAPLEY	000356-000387	4/1/1971	1971-04-01 The Watchtower Published by WTBS PA	RYAN
CAEKAERT/MAPLEY	000388-000419	11/1/1995	1995-11-01 The Watchtower Published by WTPA	RYAN
CAEKAERT/MAPLEY	000420-000451	6/22/1982	1982-06-22 Awake! Magazine Published by WTNY	RYAN
CAEKAERT/MAPLEY	000452-000483	1/22/1985	1985-01-22 Awake! Magazine Published by WTNY	RYAN
CAEKAERT/MAPLEY	000484-000623	10/1972	1972-10 Kingdom Ministry School Course Published by WTPA	RYAN
CAEKAERT/MAPLEY	000624-000723	9/1977	1977-09 Pay Attention to Yourselves and to All the Flock Published by WTNY	RYAN
CAEKAERT/MAPLEY	002685	3/30/1917	1917-03-30 Letter from WTPA to someone in Illinois thanking them for a	RYAN

CAEKAERT/MAPLEY	002744	4/23/1988	Real Fortin Disfellowship S-77 Form for attempted molestation of his daughter	RYAN
CAEKAERT/MAPLEY	002766-002772	1/20/2011, 4/21/2011, 6/10/2011, 10/10/2011, 11/1/2011 & 12/26/2011	Correspondence between Ludlow, MA local congregation and the "Christian Congregation of Jehovah's Witnesses" regarding Mr. Fortin and how to handle his position in the church in light of his past admissions of sexual	RYAN
CAEKAERT/MAPLEY	002797-002800	1949	Counsel on Theocratic Organization - Montana	RYAN
CAEKAERT/MAPLEY	002801-002833	1960	Preaching & Teaching in Peace and Unity	RYAN
CAEKAERT/MAPLEY	002834-003027	1972	Organization for Kingdom-Preaching and Disciple-Making Book	RYAN