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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,)

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

vs.)

JOINT DISCOVERY PLAN

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

COMES NOW the Plaintiffs, Tracy Caekaert and Camillia Mapley, and
Defendant Watchtower Bible and Tract Society of New York, Inc., by and through
their undersigned counsel, and hereby submit this Joint Discovery Plan pursuant to

the Court's Order of May 20, 2020. On June 29, 2020, a telephone conference was attended by counsel for Plaintiffs James Murnion, Rob Stepans, and Ryan Shaffer and counsel for Defendant Watchtower Bible and Tract Society of New York, Inc., Jon Wilson and Guy Rogers. Pro se Defendant Bruce Mapley Sr. was invited to attend but declined.

At the June 29 phone conference, counsel for the parties discussed the matters listed in Rule 26(f). At the outset, counsel for all parties agreed discovery in this case is expected to take considerably longer than an average case. The sexual abuse Plaintiffs allegedly suffered occurred over 40 years ago. Plaintiffs have alleged the abuse has caused them severe and continuing harm throughout their lives. Gathering documents and witness testimony relevant to these allegations over such an extended time will require an enormous amount of counsels' and the parties' time and effort. As such, counsel for the parties agreed an extended discovery period is necessary and appropriate, and agreed specifically to the following deadlines:

- Initial disclosures on August 1, 2020.
- Simultaneous liability expert disclosure and Plaintiffs' damages expert disclosure on September 1, 2021.
- Defendants' damages expert disclosure on October 1, 2021.
- Close of discovery on December 1, 2021.

Counsel for the parties agreed that discovery, including expert testimony, will generally concern the Plaintiffs' claims, their damages, and Defendants' defenses.

Counsel for the parties do not presently know of any issues concerning discovery of electronically stored information and agreed to produce electronically stored information in PDF format.

Counsel for the parties do not presently know of any issues concerning privileged or work-product protected materials.

Counsel for the parties do not presently request any changes to the limitations on discovery imposed by the Federal Rules of Civil Procedure or the Local Rules. Counsel did discuss the possibility that more than ten depositions per party may ultimately be required and agreed to work together if so.

Counsel for the parties discussed the likely need for a protective order pursuant to Rule 26(c) and, when necessary, agreed to cooperatively present one to the Court for its approval.

DATED this 6th day of July, 2020.

By: /s/ Ryan Shaffer

Robert L. Stepan

Ryan R. Shaffer

James C. Murnion

MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiff

By: /s/ Guy W. Rogers

Guy W. Rogers

Jon A. Wilson

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*Attorneys for Defendants Watchtower Bible
and Tract Society of New York, Inc., and
Watch Tower Bible and Tract Society of
Pennsylvania*