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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*

**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

**DECLARATION OF JOEL M.  
TAYLOR IN SUPPORT OF  
APPLICATION TO APPEAR *PRO  
HAC VICE***

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I, Joel M. Taylor, declare as follows:

(A) In compliance with D. Mont. L.R. 83.1(d)(3), I provide the following information under penalty of perjury:

My full contact information is:

Joel M. Taylor, Esq.  
Miller McNamara & Taylor LLP  
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Mount Kisco, New York 10549

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(B) The \$225 admission fee will be paid simultaneously with the filing of this application.

(C) I am proficient in the electronic filing using the CM/ECF system used by the District of New Jersey.

(D-G) I have been continually admitted to practice in the State of New Jersey since December 9, 2003, and continually admitted to practice in the State of New York since May 25, 2005. I am in good standing to practice in these courts and have not had an admission to practice terminated by any court. I am not currently suspended or disbarred in any other court. I have never been held in contempt, disciplined or sanctioned under Fed.R.Civ.P. 11 or 37(b), (c), (d) or (f) or their state equivalent.

(H) I have not, concurrently or within 2 years preceding the date of this application, made any *pro hac vice* application to this court.

(I) I understand that *pro hac vice* admission in this court is personal to me only and is not admission of a law firm and that I will be held fully accountable for the conduct of litigation in this court;

(J) I have complied with Montana Rule of Professional Conduct 8.5.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

DATED this 15<sup>th</sup> day of September, 2020, at Patterson, New York.

By:   
Joel M. Taylor