

Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
Meyer, Shaffer & Stepan, PLLP
430 Ryman Street
Missoula, MT 59802
Tel: (406) 543-6929
Fax: (406) 721-1799
rob@mss-lawfirm.com
ryan@mss-lawfirm.com
james@mss-lawfirm.com

Attorneys for Plaintiff

Guy W. Rogers
Jon A. Wilson
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
grogers@brownlawfirm.com
jwilson@brownlawfirm.com
*Attorneys for Defendants Watchtower
Bible Tract and Society of New York,
Inc., and Watchtower Bible Tract and
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,)

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

BRUCE MAPLEY, SR.,)
Cross Defendant.)

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

**PLAINTIFFS' AND
WATCHTOWER
DEFENDANTS' MOTION TO
AMEND JURISDICTIONAL
DISCOVERY SCHEDULING
ORDER**

COMES NOW, Plaintiffs and Watch Tower Bible and Tract Society of Pennsylvania and Watchtower Bible and Tract Society of New York, Inc. (collectively, “Watchtower Defendants”), by and through their respective undersigned counsel, respectfully moves the Court to amend its Jurisdictional Discovery Scheduling Order (Doc. 42) to clarify that depositions must occur by April 30, 2021, and that transcripts of such depositions need not be submitted to the Court. The basis for such request is as follows:

- On September 23, 2020, the parties filed their Joint Jurisdictional Discovery Plan, requesting, *inter alia*, that the deadline for depositions be set for April 30, 2021. Doc. 36 at 4.
- On October 14, 2020, the Court issued its Jurisdictional Discovery Scheduling Order, which states in pertinent part “Deadline for Depositions of Individuals with knowledge of pertinent jurisdictional questions (must be submitted to the Court by this date): **April 30, 2021**. Doc. 42 at 2.
- Counsel believes that the Court did not intend to require the parties to submit entire deposition transcripts.

Alternatively, if the Court does want full transcripts submitted, the parties respectfully request the Court clarify the same because such requirement will affect the scheduling of upcoming depositions.

DATED this 26th day of February, 2021.

By: /s/ Ryan Shaffer

Robert L. Stepan

Ryan R. Shaffer

James C. Murnion

MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs

By: /s/ Guy W. Rogers

Guy W. Rogers

Jon A. Wilson

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*