

Jon Wilson

From: Ryan Shaffer <ryan@mss-lawfirm.com>
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To: Jon Wilson; Brett Jensen; Gerry.Fagan@moultonbellingham.com; Christopher Sweeney; Jordan.FitzGerald@moultonbellingham.com; Joel Taylor
Cc: Rob Stepan; James Murnion; Katy Gannon; Matthew Merrill; Jessica Yuhas
Subject: Caekaert v. Watchtower; Rowland v. Watchtower

Counsel,

Plaintiffs do not see a way around obtaining new scheduling orders in both cases.

We did not anticipate the extensive and time consuming litigation that is going to be necessary over WTNY's privilege log, which needs to be resolved before we can complete several fact witness depositions. We have one motion on the privilege log pending, and more are likely coming. However, we need to complete the Brumley and Rule 30b6 depositions to more fully evaluate those motions. I am hopeful that we can get those done this month, but I have not heard back about Brumley's deposition from PA's counsel.

Given these circumstances, I could see discovery going into the middle of next year.

Does anyone have an objection to advising the Court of these circumstances and seeking new scheduling orders? Please let me know.

Thanks,

Ryan R. Shaffer



Montana Office:
430 Ryman St.
Missoula, MT 59802
Tel: 406-543-6929
Fax: 406-721-1799

Wyoming Office:
3490 Clubhouse Drive, Suite 104
Wilson, WY 83014
Tel: 307-734-9544
Fax: 307-733-3449

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