

BROWN LAW FIRM, PC

Michael P. Heringer
Guy W. Rogers
Scott G. Gratton
Kelly J.C. Gallinger*
Jon A. Wilson
Seth A. Cunningham
Shane A. MacIntyre
Adam M. Shaw
Brett C. Jensen*
Nathan A. Burke
Alex J. Ames
Erik M. Anderson
Zachary A. Hixson

315 N. 24th Street | PO Drawer 849 | Billings, Montana 59103-0849
Phone: 406.248.2611 | Fax: 406.248.3128

Jon A. Wilson
jwilson@brownfirm.com

Brett C. Jensen
bjensen@brownfirm.com

September 15, 2022

VIA EMAIL and U.S. MAIL

Robert L. Stepan / rob@mss-lawfirm.com
Ryan R. Shaffer / ryan@mss-lawfirm.com
James C. Murnion / james@mss-lawfirm.com
MEYER SHAFFER & STEPANS PLLP
430 Ryman Street
Missoula, MT 59802

Of Counsel
Robert L. Sterup

Retired
Rockwood Brown
John Walker Ross
Margy Bonner
John J. Russell

Re: *Tracy Caekaert and Camillia Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.*
USDC Billings Division 20-CV-52-SPW-TJC
File No. 78280.001

Ariane Rowland and Jamie Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.
USDC Billings Division 20-CV-59-SPW-TJC
File No. 78280.002

Gentlemen:

We are writing in regard to Ryan's letter dated September 9, 2022, regarding the WTNY 30(b)(6) deposition, as well as Ryan's e-mail dated September 12, 2022, suggesting a need for a new scheduling order in both cases.

Considering first Ryan's September 9 letter, our letter dated August 15, 2022, set forth WTNY's positions regarding the 30(b)(6) deposition. Ryan's letter dated August 18, 2022, expressed understanding of and agreement with the positions set forth in the August 15 letter. WTNY will prepare its representative in accordance with those positions, and to the extent Ryan's September 9 letter seeks to change the parameters set forth in the August 15 and 18 letters, WTNY does not agree with the same.

*also licensed in
North Dakota

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Ryan's September 9 letter also suggests possible questions regarding "CCJW or some other JW entity." The Notice dated August 30, 2022, only includes the following reference to other potential entities: "Identify how elders have been instructed to report instances or allegations of child sex abuse to WTNY, WTPA, CCJW, or any other Jehovah's Witness entity or group responsible for managing and responding to instances or allegations of child sex abuse." WTNY will prepare its representative in regard to that topic, and to the extent Ryan's September 9 letter seeks to increase the scope of topics, WTNY does not agree to the same.

Turning to Ryan's September 12 e-mail, WTNY is generally agreeable to a request for new scheduling orders in both cases. However, WTNY does not agree with any suggestion that the need for new scheduling orders is due to any actions on the part of WTNY, as WTNY initially produced its privilege log on March 25, 2022. Also, it is WTNY's position that written discovery can be completed by the current deadline of December 12, 2022, and that any new scheduling order should keep such date for the close of written discovery.

Finally, we intend to file a motion with the Court for oral argument as to Plaintiffs' Motion to Compel Re: Waived Privilege in the *Caekaert* lawsuit. Please let us know if you have any objection.

Thank you for your attention to these matters, and we look forward to your thoughts regarding these issues.

Sincerely,



Jon A. Wilson
Brett C. Jensen
JAW / BCJ

cc: Joel M. Taylor (via e-mail)
Gerry P. Fagan / Christopher T. Sweeney / Jordan W. FitzGerald (via e-mail)