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April 13, 2022

Via Email and U.S. Mail

Jon A. Wilson
Brett C. Jensen
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Re: *Caekaert & Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.*
Rowland & Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.

Dear Jon,

After reviewing WTNY's privilege log, we believe additional information is needed to appropriately assess the application of the asserted privileges.

With regard to all assertions of attorney-client privilege, please identify the following for each entry in the privilege log:

- The name and address of the client;
- The name of the attorney, including the names of individual lawyers, their address, and their employer;
- The name of the individual who authored the allegedly privileged document;
- For notes of phone calls where attorney-client privilege is asserted, the date of the phone call, identification of all individuals on the phone call, and the address or geographic location of each person on the call;
- Identification of who made the phone call that is the subject of the privileged entry;
- The subject matter of the allegedly privileged communication, i.e. child sex assault; and
- If the phone call that is the subject of the privileged entry was initiated by the Legal Department, please identify what precipitated the call.

With regard to all assertions of clergy-penitent privilege, please identify the following for each entry in the privilege log:

- The name of the cleric or clergy person and a description of that person's religious role;
- The name of the penitent involved;
- The general nature of the spiritual inquiry being made by the penitent;
- The author of any letter received by WTNY's Service Department where clergy-penitent privilege is claimed;
- The dates of the conduct at issue in the allegedly privileged communication;
- The nature of the religious guidance, admonishment, or advice that is the subject of the allegedly privileged communication;

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- The general subject matter of the allegedly privileged communication, i.e. child sex assault; and
- Your position on who holds the alleged privilege being asserted.


With regard to all assertions of third-party privilege, please identify:

- The legal basis for the assertion of the third-party privilege; and
- Your position on who holds such privilege.

Don't hesitate to contact me if you have any questions. I look forward to hearing from you.

Sincerely,

~~MEYER~~ SHAFFER & STEPANS, PLLP



Ryan R. Shaffer

cc: Joel Taylor, Esq., via email only, jtaylor@mmt-law.com