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August 18, 2022

Via Email and U.S. Mail

Jon A. Wilson
Brett C. Jensen
BROWN LAW FIRM, P.C.
P.O. Drawer 849
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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 and Brett,

Thank you for your letter of August 15, 2022 regarding the draft 30(b)(6) deposition notice. We appreciated the opportunity to discuss your concerns with the draft notice on August 2. Following our phone call, we understood that you planned to speak with Joel Taylor about the number of databases that may have information relevant to our case. We provided Exhibit A to the draft 30b6 deposition notice to confirm the existence of a "CM" database. Based on your letter, the only remaining concern with the topics appears to be the time period.

With respect to the time period, we agree that the focus is on information created before 1992. However, to the extent that information was preserved and transferred to different record-keeping databases, the continued existence of the information beyond 1992 does not make the information irrelevant or undiscoverable. Your letter acknowledges this by describing handwritten notes that were converted to electronic records and then to an updated note-taking system. We are in agreement that the preservation or storage of information does not, by itself, destroy either relevancy or privilege.

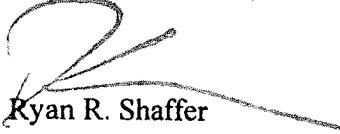
We also discussed the scope of questions regarding claims of privilege during our call on August 2 and clarified that the intent of the questions will be the procedures and relationships that Defendants claim establish and preserve privilege, not on seeking specific privileged advice in a specific privilege log entry. Because your letter of August 15 does not address these issues further, they appear to be resolved.

In summary, based on your letter, we understand that our August 2 conversation and copy of Exhibit A resolved your concerns regarding the draft 30b6 deposition notice. If you would like us to consider reviewing any other minor modifications or clarifications to the draft notice, please provide those by close of business on **August 25, 2022**. Otherwise, we will prepare a

final notice with the understanding that you will properly designate and prepare representatives for each topic.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP

A handwritten signature in black ink, appearing to read "Ryan R. Shaffer", with a long horizontal flourish extending to the right.

Ryan R. Shaffer

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