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January 19, 2023

## Via Email and U.S. Mail

Gerry P. Fagan Christopher T. Sweeney Jordan W. FitzGerald 27 North 27<sup>th</sup> Street, Suite 1900 P.O. Box 2559 Billings, MT 59103

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> Re: Caekaert & Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al. Response to January 6, 2023 Letter regarding Discovery Responses of Mapley

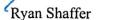
Dear Gerry:

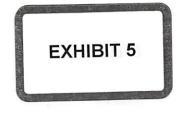
Thanks for the call last Friday regarding your discovery letter. We addressed most of your concerns by amending our previous supplemental discovery to correct the misnumbering that had occurred. Thanks for your patience with that. We discussed at length Plaintiffs concerns with what we have characterized as WTPA's contention interrogatories where counsel originally answered and we then supplemented with Plaintiffs' personal answers to the interrogatories posed. Plaintiffs are not inclined to amend or supplement those answers at this point in time. Lastly, after researching it, we do not believe that the Rules require us to itemize the pleadings and prior statements made by Defendants in other cases that we have in our possession.

Please let me know if you would like to discuss any of this further.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP





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