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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA)
MAPLEY,)

Plaintiffs,)

vs.)

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA, and)
BRUCE MAPLEY, SR.,)

Defendants,)

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
Cross Claimant,)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

Case No. CV-20-52-BLG-SPW

**PLAINTIFF CAMILLIA
MAPLEY'S ANSWERS AND
RESPONSES TO DEFENDANT
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA'S FIRST
DISCOVERY REQUESTS TO
PLAINTIFF CAMILLA MAPLEY**

EXHIBIT 6

RESPONSE: See Resp. to WTNY's RFP 3.

REQUEST FOR PRODUCTION NO. 8: Please produce all social networking postings and communications, (including but not limited to Facebook, Snapchat, Instagram, Myspace, LinkedIn, YouTube, Twitter, Google Plus, Tumblr, WhatsApp, etc....) by you from the period 2003 to the present, including photographs, written posts, social media contacts (e.g., "Friends"), and indications of interest in people, places, things, or issues.

RESPONSE: Objection, overbroad, undue burden, and a party seeking entire social media accounts must first make a threshold showing that private social media data will lead to relevant information. See e.g. *Keller v. Natl. Farmers Union Prop. & Cas. Co.*, CV 12-72-M-DLC-JCL, 2013 WL 27731 at *4 (D. Mont. Jan. 2, 2013). WTPA has not made the required threshold showing.

REQUEST FOR PRODUCTION NO. 9: Please produce all written or electronic information showing or referring your affiliation with any church, religious organization, spiritual organization, or any anti-religious organization at any time.

RESPONSE: Objection, this RFP is not reasonably calculated to lead to the discovery of admissible evidence because it has nothing to do with any fact at issue in the case.

REQUEST FOR PRODUCTION NO. 10: Please produce all written or

electronic information in your possession, custody, or control about alleged child sexual abuse by, or claims against, religious entities and members of Jehovah's Witnesses, including newspapers, magazines, books, the internet, or information from counselors, therapists, or other mental health professionals about those subjects.

RESPONSE: Objection, vague, ambiguous, overbroad, and work product because it is not clear whether this RFP is seeking such material in the possession of Plaintiff's lawyers. Objection, this RFP is not reasonably calculated to lead to the discovery of admissible evidence because it has nothing to do with any fact at issue in the case.

REQUEST FOR PRODUCTION NO. 11: Please produce all photographs that include you and Defendant Bruce Mapley, Sr.

RESPONSE: Objection, overly burdensome, and this RFP is not reasonably calculated to lead to the discovery of admissible evidence because it has nothing to do with any fact at issue in the case.

REQUEST FOR PRODUCTION NO. 12: Please produce all documents indicating that you have ever been arrested and all documents relating to those arrests, if any.

RESPONSE: Objection, this RFP is not reasonably calculated to lead to the discovery of admissible evidence because it has nothing to do with any fact at issue

Complaint, including but not limited to emails, text messages, photos, memos, receipts, schedules, and correspondence, which have not already been produced.

RESPONSE: Objection, vague, overbroad, and overly burdensome. The universe of “all other documents related in any way to the allegations contained in the operative Complaint” is both subjective and limitless and it makes responding to this RFP effectively impossible. Plaintiff has produced all requested and discoverable documents in her possession to date.

INTERROGATORY NO. 14: Please identify every document requested by WTPA’s discovery requests but which you withheld from disclosure on the basis of privilege and/or work product. Please provide the date of its creation, its author, its custodian, the names of those individuals who have viewed it, and the reasons for the non-disclosure. In the alternative, please produce a complete and detailed privileged log identifying the foregoing.

ANSWER: See Privilege Log.

DATED this 29th day of June, 2022.

CERTIFICATE OF OBJECTIONS

I, Ryan R. Shaffer, hereby certify that I made each of the foregoing objections.



Ryan R. Shaffer
Attorney for Plaintiff