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May 17, 2023

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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

Greetings:

We are writing in regard to Katy's letter dated May 4, 2023, James's letter dated May 15, 2023, and Ryan's letter dated May 17, 2023, with deposition notices directed to Messrs. Smalley, Breaux, and Shuster. As to Katy's letter, thank you for clarifying as to Request for Production Nos. 23 (Caekaert/Mapley) and 26 (Rowland/Schulze) that, other than the e-mail from your paralegal Jessica Yuhas to attorney Juan Flores dated October 18, 2022, your office did not send any other similar requests for information to any other lawyer or law firm. Should your firm send any such requests in the future, we expect the original response will be supplemented.

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Brown Law Firm, P.C.
May 17, 2023
Page 2 of 3

Turning to Request for Production Nos 24 (Caekaert/Mapley) and 27 (Rowland/Schulze), you contend responsive documents can be more conveniently obtained by Defendants because they were parties to the cases where the responsive documents were generated. However, we have no way of evaluating such contention without knowing what cases you are referring to. Please provide a list of cases, including the case name and the name of the court where the case was heard, to which you are referring so that we can evaluate your contention.

In regard to Ms. Caekaert's Facebook messages, while we appreciate the additional documentation provided at her deposition in relation to the message bates stamped CAEKAERT/MAPLEY 004188, there appear to be other missing messages as follows:

- The messages bates stamped CAEKAERT/MAPLEY 004161 appear to be part of a conversation, as the first message produced begins "Well that will probably be the case . . .", so it appears at least one prior relevant message has not been produced.
- The messages bates stamped CAEKAERT/MAPLEY 004165 appear to be part of a conversation, as the first message produced begins "Yeah . . .", so it appears at least one prior relevant message has not been produced. The copy produced also includes a reference to a message sent on October 29, 2018, at 9:10 a.m. that has not been produced, and there is a gap until December 14, 2018, the date of the next message produced.
- The messages bates stamped CAEKAERT/MAPLEY 004176 appear to be part of a conversation, as the first message produced begins "yes, what?", so it appears at least one prior relevant message has not been produced.
- The message bates stamped CAEKAERT/MAPLEY 004178 appears to be part of a conversation, and at least one prior relevant message has not been produced that is cutoff on the copy provided.
- The messages bates stamped CAEKAERT/MAPLEY 004179 appears to be part of a conversation, as the first message produced begins "I get how you feel.", so it appears at least one prior relevant message has not been produced.
- The messages bates stamped CAEKAERT/MAPLEY 004180 appears to be part of a conversation, as the first message produced begins "I don't feel you have anything to apologize for.", so it appears at least prior relevant message, that can be seen cutoff on the copy provided, has not been produced. There also appears to be a message at the bottom of this page that has been cutoff.

Brown Law Firm, P.C.
May 17, 2023
Page 3 of 3

The messages bates stamped CAEKAERT/MAPLEY 004181-004182 appears to be part of a conversation with part of the first produced message cutoff, and there appears to be a message at the bottom of page CAEKAERT/MAPLEY 004185 cutoff.

The messages bates stamped CAEKAERT/MAPLEY 004184-004185 appears to be part of a conversation with a message at the bottom of page CAEKAERT/MAPLEY 004185 cutoff.

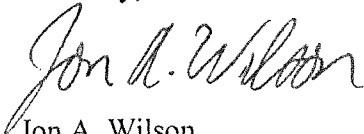
The message bates stamped CAEKAERT/MAPLEY 004187 appears to be part of a conversation, as the message begins with "I look at this . . .", so it appears at least one prior relevant message has not been produced, and there appears to be a message at the bottom of this page that has been cutoff.

Please produce these missing messages, which will help us determine if other relevant messages may be missing from the production to date.

Finally, as to James's and Ryan's letters, while we continue to disagree with your contentions, characterizations, and accusations regarding your requested depositions of Messrs. Breaux, Shuster, and Smalley, thank you for confirming your position that the dispute regarding these requested depositions is ripe for resolution by the Court. We will proceed with filing a motion for protective order by the end of the week. We understand from your correspondence that Plaintiffs object to such a motion and will so advise the Court, but please advise if that understanding is incorrect.

Thank you for your attention to these matters, and please contact us with any questions or concerns.

Sincerely,



Jon A. Wilson
Michael P. Sarabia
JAW/MPS

cc: Joel M. Taylor (via e-mail)
Gerry Fagan, Christopher Sweeney, Jordan Fitzgerald (via e-mail)