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May 3, 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

Counsel:

Thanks for your letter of May 1, 2023, regarding your desire to depose Messrs. Breaux, Shuster, and Smalley. We disagree with your contentions, characterizations, and accusations in that letter.

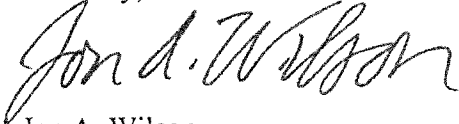
Since you do not find our alternative witnesses acceptable, it appears we are at an impasse regarding the potential depositions discussed in our respective letters from May 1, 2023, and which were also the topic of our meet-and-confer call on April 25, 2023. When and if you issue deposition notices directed to Messrs. Breaux, Shuster, and

*also licensed in
North Dakota

Brown Law Firm, P.C.
May 3, 2023
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Smalley, this issue will be ripe for consideration by the Court, and we will proceed with filing a motion for protective order. In light of your May 1, 2023, letter, we assume you will object to such a motion for protective order. If we are mistaken, please let us know as soon as possible so that we can so inform the Court.

Sincerely,

A handwritten signature in black ink that reads "Jon A. Wilson". The signature is written in a cursive, flowing style.

Jon A. Wilson
Michael P. Sarabia
JAW/MPS

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