



**Meyer, Shaffer
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May 17, 2023

Via Email and U.S. Mail

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Joel M. Taylor, Esq. *pro hac vice*
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Re: Notices of Deposition to Gene Smalley, Gary Breaux. and Allen Shuster
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 Counsel.

Please find enclosed deposition notices for Gene Smalley, Gary Breaux. and Allen Shuster to be taken in New York on August 30th, 31st. and September 1st.

As noted in our letter of May 15th. based on our extensive conferral we understand that you object to these depositions. Please let me know if this is not correct. Assuming you still object. please file for a protective order by 5/22/23 so that the Court can take the matter up well in advance of the noticed dates. If you do not file for a protective order (or withdraw your objections to these depositions by direct communication to me by 5/22/23) Plaintiffs intend to ask the Court to compel the depositions.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP

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

Ryan R. Shaffer

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

TRACY CAEKAERT, and CAMILLIA)
MAPLEY,)
Plaintiffs,)
vs.)

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

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

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC., AND)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA,)
Cross Claimants)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

ARIANE ROWLAND, and JAMIE)
SCHULZE)

Plaintiff,)

vs.)

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

Defendants.)

Case No. CV-20-59-BLG-SPW

NOTICE OF DEPOSITION OF GENE SMALLEY

PLEASE TAKE NOTICE that Plaintiffs in the above-entitled actions will take the oral deposition of Gene Smalley on **Wednesday, August 30, 2023 starting at 9:00 a.m. (EDT)**, and there after until the same shall be completed. The deposition will take place at **Veritext Legal Solutions, 50 Main Street, 3rd Floor, White Plains, NY 10606**. The deposition will be recorded by stenographic means before a duly qualified court reporter, and by audiovisual means. The deposition shall be used consistent with all purposes permitted by law.

DATED this 17th day of May, 2023.

MEYER, SHAFFER & STEPANS, PLLP

/s/ Ryan Shaffer
Ryan R. Shaffer

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May, 2023, a true and accurate copy of the foregoing was served on the following via email and U.S. Mail:

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TRACY CAEKAERT, and CAMILLIA)
MAPLEY,)
Plaintiffs,)
vs.)

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SOCIETY OF NEW YORK, INC., and)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA.,)
Defendants,)

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC., AND)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA,)
Cross Claimants)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

ARIANE ROWLAND, and JAMIE)
 SCHULZE)
)
 Plaintiff,)
)
 vs.)
)
 WATCHTOWER BIBLE AND TRACT)
 SOCIETY OF NEW YORK, INC., and)
 WATCH TOWER BIBLE AND TRACT)
 SOCIETY OF PENNSYLVANIA,)
)
 Defendants.)

Case No. CV-20-59-BLG-SPW

NOTICE OF DEPOSITION OF GARY BREAUX

PLEASE TAKE NOTICE that Plaintiffs in the above-entitled actions will take the oral deposition of Gary Breaux on **Thursday, August 31, 2023 starting at 9:00 a.m. (EDT)**, and there after until the same shall be completed. The deposition will take place at **Veritext Legal Solutions, 50 Main Street, 3rd Floor, White Plains, NY 10606**. The deposition will be recorded by stenographic means before a duly qualified court reporter, and by audiovisual means. The deposition shall be used consistent with all purposes permitted by law.

DATED this 17th day of May, 2023.

MEYER, SHAFFER & STEPANS, PLLP

/s/ Ryan Shaffer
 Ryan R. Shaffer

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

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MAPLEY,)
Plaintiffs,)
vs.)

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

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC., AND)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA,)
Cross Claimants)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

ARIANE ROWLAND, and JAMIE)	
SCHULZE)	
)	Case No. CV-20-59-BLG-SPW
Plaintiff,)	
)	
vs.)	
)	
WATCHTOWER BIBLE AND TRACT)	
SOCIETY OF NEW YORK, INC., and)	
WATCH TOWER BIBLE AND TRACT)	
SOCIETY OF PENNSYLVANIA,)	
)	
Defendants.)	

NOTICE OF DEPOSITION OF ALLEN SHUSTER

PLEASE TAKE NOTICE that Plaintiffs in the above-entitled actions will take the oral deposition of Allen Shuster on **Friday, September 1, 2023 starting at 9:00 a.m. (EDT)**, and there after until the same shall be completed. The deposition will take place at **Veritext Legal Solutions, 50 Main Street, 3rd Floor, White Plains, NY 10606**. The deposition will be recorded by stenographic means before a duly qualified court reporter, and by audiovisual means. The deposition shall be used consistent with all purposes permitted by law.

DATED this 17th day of May, 2023.

MEYER, SHAFFER & STEPANS, PLLP

/s/ Ryan Shaffer
Ryan R. Shaffer

Attorneys for Plaintiffs

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