

Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
Victoria K.M. Gannon  
Meyer, Shaffer & Stepan, PLLP  
430 Ryman Street  
Missoula, MT 59802  
Tel: (406) 543-6929  
Fax: (406) 721-1799  
rob@mss-lawfirm.com  
ryan@mss-lawfirm.com  
james@mss-lawfirm.com  
katy@mss-lawfirm.com

Matthew L. Merrill (appearing *pro hac vice*)  
Merrill Law, LLC  
6631 Mariposa Court  
Denver, CO 80221  
Tel: (303) 947-4453  
matthew@merrillwaterlaw.com

*Attorneys for Plaintiffs*

**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., and )  
WATCH TOWER BIBLE AND TRACT )  
SOCIETY OF PENNSYLVANIA., )  
 )  
Defendants. )  
 )

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

**PLAINTIFFS' UNOPPOSED  
MOTION FOR HEARING ON  
MOTION FOR PROTECTIVE  
ORDER RE: WTPA'S  
FOURTH DISCOVERY  
REQUESTS TO PLAINTIFFS  
(DOC. 261)**

Plaintiffs, by and through undersigned counsel, respectfully request a hearing on Plaintiffs' Motion for Protective Order re: WTPA's Fourth Discovery Requests to Plaintiffs (Doc. 261). Defendant WTPA does not oppose this motion.

A proposed Order is attached hereto and will be emailed to the Court pursuant to L.R. 7.1.

DATED this 21<sup>st</sup> day of September, 2023.

By: /s/ Ryan Shaffer  
Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer  
Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*