

Exhibit A

TRACY CAEKAERT, ET AL. V. WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., ET AL
CAUSE NO. 1:20-CV-00052-SPW; UNITED STATES DISTRICT COURT, FOR THE DISTRICT OF MONTANA, BILLINGS DIVISION

ARIANE ROWLAND, ET AL. V. WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., ET AL
CAUSE NO. 1:20-CV-00059-SPW; UNITED STATES DISTRICT COURT, FOR THE DISTRICT OF MONTANA, BILLINGS DIVISION

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK INC'S PRIVILEGE LOG

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
Watchtower Legal Department Records							
1.	07/22/1992	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Bruce Mapley	PDF	A/C
2.	07/22/1992 through 10/01/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Ashland, WI; Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. Re: Legal Advice concerning Bruce Mapley	Lotus Notes PDF	A/C; TP
3.	07/22/1992 through 10/01/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; Ashland, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. Re: Legal Advice Bruce Mapley	HuB PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
4.	04/08/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Roebuck, Birmingham, AL, Congregation. Re: Legal Advice concerning Bruce Mapley	HuB PDF	A/C
5.	03/26/1994	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Martin Svenson	PDF	A/C; TP
6.	03/26/1994 through 12/10/2018	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. Re: Legal Advice concerning Martin Svenson	Lotus Notes PDF	A/C; TP
7.	03/26/1994 through 12/10/2018	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. Re: Legal Advice concerning Martin Svenson	HuB PDF	A/C; TP
8.	05/01/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. Re: Legal Advice concerning Martin Svenson	HuB PDF	A/C
9.	05/07/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. Re: Legal Advice concerning Martin Svenson	HuB PDF	A/C
10.	10/17/2019 and 12/13/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. Re: Legal Advice concerning Gunnar Hain	Lotus Notes PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
11.	10/17/2019 and 12/13/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. Re: Legal Advice concerning Gunnar Hain	HuB PDF	A/C; TP
12.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [A.A.]	HuB PDF	A/C; TP
13.	07/29/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [J.C.]	HuB PDF	A/C; TP
14.	01/16/2006 through 10/09/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [R.H.]	HuB PDF	A/C; TP
15.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [N.M.]	HuB PDF	A/C; TP
16.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [P.M.]	HuB PDF	A/C; TP
17.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [A.M.]	HuB PDF	A/C; TP
18.	04/02/2021	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [R.M.]	HuB PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
19.	12/05/2003	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [J.N.]	HuB PDF	A/C; TP
20.	11/01/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [K.R.]	HuB PDF	A/C; TP
21.	05/24/2018 through 06/15/2018	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [M.R.]	HuB PDF	A/C; TP
22.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [J.R.]	HuB PDF	A/C; TP
23.	04/23/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [M.S.]	HuB PDF	A/C; TP
24.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Mildred Svenson	HuB PDF	A/C; TP
25.	11/01/2014 through 09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [V.T.]	HuB PDF	A/C; TP
26.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [C.W.]	HuB PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
Correspondence (March 14, 1997, BOE Letter Responses)							
27.	04/19/1997	Letter	C.F. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [C.R.]	PDF	CP; TP
28.	04/24/1997	Letter	H.P. Congregation	Service Department	Confidential communication Re: seeking or receiving religious guidance, admonishment, or advice concerning Third Party [B.M.]	PDF	CP; TP
29.	04/25/1997	Letter	Hardin Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party Gunnar Hain [This specific communication has already been reviewed <i>in camera</i> by this Court and determined to be protected under Montana's clergy-penitent privilege under § 26-1-804 (see Court's order dated July 30, 2021, Doc #82 at pp. 3-4)]	PDF	CP; TP
30.	05/14/1997	Letter	E. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [M.C.]	PDF	CP; TP
31.	05/29/1997	Letter	L. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [L.J.]	PDF	CP; TP
32.	08/06/1997	Letter	T.B. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [G.J.]	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
33.	08/12/1997	Letter	B. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [T.M.]	PDF	CP; TP
34.	02/02/1999	Letter	E. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [N.O.]	PDF	CP; TP
35.	02/07/2000	Letter	Be. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [K.M.]	PDF	CP; TP
36.	04/06/2000	Letter	B.H. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [R.G.]	PDF	CP; TP
Correspondence (Other)							
37.	09/15/1997	Letter	Hardin Congregation	Pacific WA Congregation	Confidential communication Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain	PDF	CP; TP
38.	09/14/1998	Letter	Hardin Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Martin Svenson	PDF	CP; TP
39.	09/27/1999	Letter	Service Department	Hardin Congregation	Confidential communication Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain	PDF	CP; TP
40.	10/14/1999	Form	Canyon Ferry Congregation, Helena, MT	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Bruce Mapley	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
41.	05/05/2011	Letter	Hardin Congregation	Legal Department	Letter seeking legal advice Re: Threat of legal action	PDF	A/C
42.	06/15/2011	Memorandum	Legal Department	Service Department	Attorney providing legal advice. Re: Bruce Mapley, Sr., and Martin Svenson	PDF	A/C
43.	12/26/2014	Memorandum	Service Department	Legal Department	Memo seeking legal advice. Re: Bruce Mapley	PDF	A/C
44.	01/02/2015	Memorandum	Legal Department	Service Department	Attorney providing legal advice. Re: Bruce Mapley, Sr., and Martin Svenson	PDF	A/C
Watchtower Legal Department Client Intake Forms							
45.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [N.M.]	PDF	A/C; TP
46.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [P.M.]	PDF	A/C; TP
47.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]	PDF	A/C; TP
48.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]	PDF	A/C; TP
49.	04/30/2020	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Legal issue involving third party unrelated to this litigation [M.S.]	PDF	A/C; TP

Key:

A/C = Attorney-Client Privilege

CP = Clergy-Penitent Privilege

TP = Third-Party Privacy

Date: March 25, 2022

Submitted by Brown Law Firm, P.C., on behalf of Defendant Watchtower Bible and Tract Society of New York, Inc.