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*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' NOTICE OF  
ERRATA RE DOC. 299**

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Based on concerns raised by counsel for Defendant Watchtower Bible and Tract Society of New York, Inc., (“WTNY”) Plaintiffs file this Notice of Errata with respect to their Reply to their Motion for Sanctions Re: WTNY’s Non-

Compliance with Court Order (ECF No. 299) (the “Reply”). Plaintiffs clarify the following point made in the Reply:

- Plaintiffs’ Reply states “Plaintiffs in both this case and its companion case (*Rowland v. Watchtower Bible and Tract Society of New York, Inc.*, CV-20-59-BLG-SPW) were subsequently abused by Hain and Mapley.” ECF No. 299 at 3.
- WTNY requested a correction of the record asserting that the above referenced statement is not accurate.
- After considering WTNY’s concern, Plaintiffs’ counsel understands the concern that the above referenced statement could be interpreted to assert that all four Plaintiffs were each subsequently abused by both Mapley and Hain, when that conclusion is not presently supported by the evidence.
- Therefore, Plaintiffs clarify that the sentence was intended to capture the current state of the evidence, which establishes that all four Plaintiffs were subsequently abused by Mapley, and Plaintiffs in the companion case (*Rowland v. Watchtower Bible and Tract Society of New York, Inc.*, CV-20-59-BLG-SPW) were subsequently abused by Hain.

Respectfully submitted this 13<sup>th</sup> day of December, 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  
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