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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.

Cause No. CV 20-52-BLG-SPW

**DEFENDANTS WATCHTOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK, INC. AND WATCH
TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA'S
JOINT MOTION FOR PARTIAL
SUMMARY JUDGMENT
PURSUANT TO FED. R. CIV. P 56**

Defendants Watchtower Bible and Tract Society of New York, Inc. and Watch Tower Bible and Tract Society of Pennsylvania hereby jointly move the Court pursuant to Fed. R. Civ. P. 56 for an order granting partial summary judgment in their favor on Plaintiffs Tracy Caekaert and Camillia Mapley's Second Claim for Negligence Per Se. The basis for this Motion is that there are no genuine disputes as to material facts relating to Plaintiffs' claim for negligence per se, and Defendants are entitled to judgment as a matter of law on that cause of action. This Motion is supported by an accompanying Brief and Statement of Undisputed Facts.

DATED this 26th day of December, 2023.

BROWN LAW FIRM, P.C.

By: /s/ Michael P. Sarabia

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