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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' UNOPPOSED
MOTION FOR EXTENSION
OF TIME TO FILE
OBJECTIONS TO
DEFENDANTS' EXPERT
WITNESS REPORTS**

Plaintiffs' by and through undersigned counsel, respectfully move the Court
for an extension of time to file their objections to the timeliness or sufficiency of

Defendants' Rule 26(a)(2)(B) disclosures. The basis for the requested extension is as follows:

1. Plaintiffs agreed to extend the Defendants' deadline for disclosing "Rebuttal Experts" to February 29, 2024.
2. Defendants' expert witness, Dr. Michael Bütz, has proposed an examination schedule that would not complete all of Plaintiffs' Rule 35 exams until June 15, 2024.
3. Plaintiffs have agreed to Dr. Bütz's proposed examination schedule pending agreement (and approval by the Court) of commensurate deadlines for Rule 26 and Rule 35 disclosures, deposition dates, and motions related to his trial testimony.
4. Thus, as of this filing, Plaintiffs have not received reports from any defense experts in this case.

Given the foregoing, Plaintiffs were unable to file objections to Defendants' expert disclosures by the current February 27, 2024, deadline. *See* ECF No. 286.

Accordingly, Plaintiffs seek a continuance of that deadline to be commensurate with the extensions that Plaintiffs have given Defendants for their expert witness disclosures:

1. For Defendants' "Rebuttal Experts" Plaintiffs shall file their objections to the timeliness or sufficiency of the Rule 26(a)(2)(B) reports within fourteen (14) days of February 29, 2024.
2. For Defendants' expert, Dr. Michael Bütz, Plaintiffs shall file their objections to the timeliness or sufficiency of his Rule 26(a)(2)(B) reports within fourteen (14) days of receipt of such reports, the dates of such disclosures to be established by subsequent order of this Court.

Defendants do not oppose this Motion and a proposed Order is attached hereto and will be emailed to the Court pursuant to L.R. 7.1.

DATED this 28th day of February, 2024.

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