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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA MAPLEY,	)	Cause No. CV 20-52-BLG-SPW
	)	
Plaintiffs,	)	<b>DEFENDANT WATCHTOWER</b>
	)	<b>BIBLE AND TRACT SOCIETY OF</b>
vs.	)	<b>NEW YORK, INC.’S RESPONSE</b>
	)	<b>TO PLAINTIFFS’ STATEMENT OF</b>
WATCHTOWER BIBLE AND	)	<b>EXPENSES AND FEES RE: ECF</b>
TRACT SOCIETY OF NEW YORK,	)	<b>NO. 318</b>
INC., WATCH TOWER BIBLE AND	)	
TRACT SOCIETY OF	)	
PENNSYLVANIA, and BRUCE	)	
MAPLEY SR.,	)	
	)	
Defendants.	)	

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Pursuant to the Court's Order dated February 6, 2024 (Doc. 318) (hereinafter "Order"), Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), hereby submits its response to Plaintiffs' Statement of Expenses and Fees Re: ECF No. 318 dated March 7, 2024 (Doc. 326) (hereinafter "Plaintiffs' Statement"). WTNY does not agree with certain gratuitous insinuations in Plaintiffs' Statement, including but not limited to the suggestion at p. 2 of Plaintiffs' Statement that any disagreement with Plaintiffs constitutes a "quibble," as well as the allegation of "constant lies and half-truths" at p. 6 of Plaintiffs' Statement. WTNY also has questions regarding certain of the time estimates in Plaintiffs' Statement and the Affidavits attached thereto, particularly the estimate that it took 120 hours to request case documents relating to the two interrogatories at issue. *See* Doc. 326-2, ¶ 11.

Nevertheless, in order to get to the merits of the claims, and without waiving any right to argue on appeal any issue with respect to the Order, WTNY will pay the \$52,976.19 set forth in Plaintiffs' Statement.

DATED this 20<sup>th</sup> day of March, 2024.

By:           /s/ Jon A. Wilson            
Jon A. Wilson / Brett C. Jensen /  
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BROWN LAW FIRM, P.C.  
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Inc.*

By: /s/ Joel M. Taylor  
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Inc.*

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(d)(2)(E), the undersigned hereby certifies this brief complies with L.R. 7.1(d)(2)(A). According to the word-processing unit used to prepare this brief, the word count is 237 words excluding caption, table of contents and authorities, exhibit index, and certificates of service and compliance.

DATED this 20<sup>th</sup> day of March, 2024.

By: /s/ Jon A. Wilson  
Jon A. Wilson / Brett C. Jensen /  
Michael P. Sarabia  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendants Watchtower  
Bible and Tract Society of New York,  
Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 20<sup>th</sup>, 2024, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan/Ryan R. Shaffer/James C. Murnion  
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by the following means:

<u>1-4</u>	CM/ECF	<u>        </u>	Fax
<u>        </u>	Hand Delivery	<u>        </u>	E-Mail
<u>5</u>	U.S. Mail	<u>        </u>	Overnight Delivery Services

By: /s/ Jon A. Wilson  
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