

Exhibit B

Jon A. Wilson
Brett C. Jensen
BROWN LAW FIRM, P.C.
315 North 24th Street
P.O. Drawer 849
Billings, MT 59103-0849
Tel. (406) 248-2611
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)
MILLER MCNAMARA & TAYLOR LLP
100 South Bedford Road, Suite 340
Mount Kisco, New York 10549
Tel./E-Fax (845) 288-0844
Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.

**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., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cause No. CV 20-52-BLG-SPW

**DEFENDANT WATCHTOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK INC.'S FIRST
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' SECOND SET OF
COMBINED INTERROGATORIES,
REQUESTS FOR PRODUCTION,
AND REQUESTS FOR
ADMISSION, AND SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' THIRD SET.**

	Cross-Claimant,)
)
vs.)
)
BRUCE MAPLEY SR.,)
)
	Cross-Claim Defendant.)
)

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and provides its First Supplemental Answers to Plaintiffs’ Second Set of Combined Interrogatories, Requests for Production, and Requests for Admission, and Second Supplemental Responses to Plaintiffs’ Third Set:

INTERROGATORY NO. 14: For each year between 1973 and 1992, please state your procedure and process for receiving correspondence from local congregations regarding child sexual abuse. Please specifically include where such correspondence was received, who received it, what was done with it, and identify everyone who had access to the substance of such correspondence.

ANSWER (June 16, 2022): Between 1973 and 1992, congregations of Jehovah's Witnesses in the United States were free to confidentially write to WTNY about any matter involving serious sin, including child sexual abuse, in order to

receive religious advice. (Proverbs 15 :22) That correspondence could be submitted in a blue colored envelope (starting in 1983) if the elders had such envelopes in their possession otherwise any color envelope could be used. Each body of elders would determine if it was necessary to write to WTNY for spiritual assistance, except that WINY specifically requested that it be notified in writing if a congregant was disfellowshipped or disassociated himself. The correspondence would be received by a mailroom, sorted by state of origin, and routed to an elder in the Service Department for processing. Elders would review the correspondence, pray, and locate scriptural passages that might assist the congregation in handling the matter. Depending on the religious need, the correspondence might have been maintained for a period of time in a secure filing cabinet in the Service Department during the years of 1973-1992 accessible only to elders in the Service Department with a specific need to know. Envelopes were not maintained in the ordinary course.

FIRST SUPPLEMENTAL ANSWER (October 23, 2023): WTNY provides the following, additional information in response to Interrogatory No. 14:

The documents referenced in WTNY's June 16, 2022 Answer to Interrogatory No. 14 remained in the secure filing cabinet in the Service Department (if there was a religious need to keep the documents, otherwise they were discarded in the ordinary course) until the 2000s. Over the next decade or so, hard-copy documents still in existence were scanned and converted into PDF format. Once a document

was scanned and converted into PDF, the hard copy was discarded. Access to the documents (in any form) was and has always been limited to elders in the Service Department who had a religious need to know. Later in the 2010s, in response to litigation holds, WTNY's Legal Department took possession of the PDF documents. Those documents remain in the possession of WTNY's Legal Department and are only accessible by Legal Department staff in connection with litigation.

INTERROGATORY NO. 15: Please identify your records custodian between 1970 and today.

ANSWER (June 16, 2022): WTNY has no records custodian, but corporate records are maintained by Mark Questell, Corporate Secretary.

FIRST SUPPLEMENTAL ANSWER (October 23, 2023): Other than corporate records that were maintained by individuals serving as Secretary/Assistant Secretary of the corporation (whose names from 1970 to present include: G. Suiter, J.O. Groh, W.K. Jackson, L.A. Swingle, J.E. Barr, T. Jaracz, J.C. Booth, D.A. Adams, H.J. Dies, R.E. Abrahamson, J.F. Simonis, G.D. Grizzle, R.M. Pevy, D.G. Sinclair, J.D. Larson, G.N. Breaux, H.T. Combs, J. Ekrann, M.L. Questell, K. Fischer, A. Griffin, E.R. Llerena, J. Morris), individual elders in the Service Department caring for religious matters had wide latitude to maintain or discard documents as they saw fit in the ordinary course. WTNY does not and has never had

VERIFICATION

Thomas Jefferson, Jr., states that he has read the foregoing *Defendant WTNY's First Supplemental Responses to Plaintiffs' Second Set of Combined Interrogatories, Requests for Production, and Requests for Admission, and Second Supplemental Responses to Plaintiffs' Third Set*, and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.


Thomas Jefferson, Jr.

Dated: 10/24/2023