

Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
Victoria K.M. Gannon  
Meyer, Shaffer & Stepan, PLLP  
430 Ryman Street  
Missoula, MT 59802  
Tel: (406) 543-6929  
Fax: (406) 721-1799  
rob@mss-lawfirm.com  
ryan@mss-lawfirm.com  
james@mss-lawfirm.com  
katy@mss-lawfirm.com

Matthew L. Merrill (appearing *pro hac vice*)  
Merrill Law, LLC  
1401 Delgany Street, #404  
Denver, CO 80202  
Tel: (303) 947-4453  
matthew@merrillwaterlaw.com

*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' MOTION  
RE: SANCTIONS  
INTERROGATORY NOS. 9  
AND 15 (ECF No. 85 & 318)**

---

Plaintiffs Tracy Caekaert and Camillia Mapley, by and through undersigned counsel, hereby respectfully move for an Order deeming additional facts admitted as a further sanction for Defendant Watchtower Bible & Tract Society of New

York, Inc.’s (“WTNY”) continuing refusal to provide full and complete answers to Interrogatories 9 and 15. *See* ECF No. 85 and ECF No. 318.

A brief in support is filed contemporaneously herewith. Plaintiffs have conferred multiple times with WTNY, and the Court has issued multiple Orders on the Discovery issues raised herein.

DATED this 4<sup>th</sup> day of April, 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*