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

Defendants.

Case No. CV-20-00052-SPW-
TJC

**DEFENDANT WTPA'S
UNOPPOSED MOTION FOR
LEAVE OF COURT TO FILE
RESPONSE BRIEF TO
PLAINTIFFS' MOTION FOR
SANCTIONS RE:
INTERROGATORY NOS. 9
AND 15**

Defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”)

respectfully requests leave of Court in order to file a short response brief to

Plaintiffs’ “Motion for Sanctions Re: Interrogatory Nos. 9 and 15 (ECF No. 85 & 318)”, filed on April 4, 2024. (Doc. No. 331)

Plaintiffs assert their Motion for Sanctions Re: Interrogatory Nos. 9 & 15 against only WTNY. (See Doc. No. 331) Their Motion is related to their previous Motion for Sanctions against WTNY, which the Court ruled upon in Doc. No. 318. However, as Plaintiffs did in their previous Motion for Sanctions (see Doc. no. 288), some of the sanctions sought by Plaintiffs in their Motion for Sanctions Re: Interrogatories Nos. 9 and 15 against WTNY would significantly impact WTPA. Plaintiffs request in their Motion as a sanction against WTNY a ruling deeming admitted the alleged facts that “[d]uring the period 1973 to 1992, the Governing Body acted through WTNY **and WTPA** when it promulgated the policies and procedures elders at local congregations were to follow when handling allegations of child sexual abuse” and “[d]uring the period 1973 to 1992, the Governing Body was acting through WTNY **and WTPA** for all purposes relevant to this case.” (Doc. No. 332, at p. 14) (emphasis added) These alleged facts, if deemed admitted as additional sanctions against WTNY, would obviously also impact WTPA even though it is not a party to Plaintiffs’ Motion for Sanctions Re: Interrogatory Nos. 9 and 15 and is not even accused of any improper conduct.

WTPA respectfully requests the opportunity to respond to Plaintiffs’ request for sanctions which would affect or impact WTPA. WTPA would only address the

remedies sought in the Motion that affect WTPA. WTPA requests to be allowed to file a response brief by April 18, 2024.

The undersigned contacted Plaintiffs' counsel about this Motion. Plaintiffs do not object to this Motion.

DATED this 10th day of April, 2024.

MOULTON BELLINGHAM PC

By /s/ Gerry Fagan

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CERTIFICATE OF SERVICE

I hereby certify that on 10th day of April, 2024, a copy of the foregoing was served on the following persons:

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By the following means:

<u>1, 2, 3</u> CM/ECF	<u> </u> Fax
<u> </u> Hand Delivery	<u> </u> E-Mail
<u>4</u> U.S. Mail	<u> </u> Overnight Delivery Services

By /s/ Gerry Fagan