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Attorneys for Defendant Watch Tower Bible and Tract Society of Pennsylvania

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.

Cause No. CV 20-52-BLG-SPW

**DEFENDANTS WATCHTOWER
BIBLE AND TRACT SOCIETY
OF NEW YORK, INC. AND
WATCH TOWER BIBLE
AND TRACT SOCIETY OF
PENNSYLVANIA'S JOINT
MOTION FOR SUMMARY
JUDGMENT**

Defendants Watchtower Bible and Tract Society of New York, Inc. and Watch Tower Bible and Tract Society of Pennsylvania hereby jointly move the Court pursuant to Fed. R. Civ. P. 56 for an order granting summary judgment in their favor on Plaintiffs Tracy Caekaert and Camillia Mapley's first cause of action for general negligence. Defendants previously moved for partial summary judgment as to Plaintiffs' second cause of action for negligence per se. (Doc. 302.)

The basis for this Motion is that there are no genuine disputes as to material facts relating to the element of duty for Plaintiffs' general negligence claim, and Defendants are entitled to judgment as a matter of law on that cause of action as well. As such, Defendants respectfully request the Court to dismiss this action with prejudice in its entirety. This Motion is supported by an accompanying Brief and Statement of Undisputed Facts.

DATED this 12th day of April, 2024.

BROWN LAW FIRM, P.C.

By: /s/ Jon A. Wilson

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