

***Exhibit D***

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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, )

WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC., )  
Cross Claimant, )

BRUCE MAPLEY, SR., )  
Cross Defendant. )

Case No. CV-20-52-BLG-SPW

**PLAINTIFF CAMILLIA  
MAPLEY’S ANSWERS TO  
DEFENDANT WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC.’S FIRST  
INTERROGATORIES TO  
PLAINTIFF CAMILLA MAPLEY**

**INTERROGATORY NO. 6:** Please identify all persons who were eyewitnesses to the abuse you suffered.

**ANSWER:** THIS ANSWER CONTAINS INFORMATION THAT IS PRIVATE, CONFIDENTIAL, AND SUBJECT TO THE PROTECTIVE ORDER GOVERNING THE USE AND DISCLOSURE OF SUCH INFORMATION (ECF DOC. 110, 111). Because the abuse at issue was many years ago, and because emotional trauma caused by sexual abuse impacts the memory of its victims, Plaintiff is not presently able to state, with certainty, every person who was an eyewitness. To the best of Plaintiff's recollection, the following people were witnesses to the abuse:

- Bruce Mapley, Sr.
- Possibly Tracy Caekaert
- Gunner Hain
- Rhonda (Hain) Klessens Bell


**INTERROGATORY NO. 7:** Please state with particularity all facts that in any way show that WTNY knew that any person identified in your Answer to Interrogatory No. 1 had sexually abused a minor prior to his/her sexual abuse of you.

**ANSWER:** THIS ANSWER CONTAINS INFORMATION THAT IS PRIVATE, CONFIDENTIAL, AND SUBJECT TO THE PROTECTIVE ORDER GOVERNING THE USE AND DISCLOSURE OF SUCH INFORMATION (ECF

DECLARATION/VERIFICATION

I have reviewed the foregoing Answers to Defendant Watchtower Bible and Tract Society of New York, Inc.'s First Set of Interrogatories and I declare under penalty of perjury under the law of the United States of America that the foregoing are true and correct.

EXECUTED ON 4/15/2022.

DocuSigned by:  
  
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Camillia Michelle Mapley  
All rights reserved, none waived.