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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' MOTIONS IN
LIMINE 1 THROUGH 9**

Plaintiffs, by and through undersigned counsel, respectfully move the Court for orders in limine precluding Defendants from questioning witnesses, offering evidence, or arguing before the jury on the following matters:

1. Defendants' alleged humanitarian aid.
2. The First Amendment.
3. Contention that Defendants did not have policies and procedures.
4. Anything contrary to the Court's factual findings.
5. Blaming other Jehovah's Witnesses' entities and departments without evidence.
6. Opinions not disclosed by Defendants' rebuttal experts in their reports.
7. The cost of Plaintiffs' medical and psychological treatment.
8. Claims that Defendants did not have notice of the abuse.
9. Suggestions of what may or may not have been included in spoliated evidence.

Defendants were contacted regarding their position on Plaintiffs' Motions in Limine and stated that they reserve their objections until they have been able to review the arguments. A brief in support is being filed contemporaneously herewith.

DATED this 14th day of June, 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

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