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*Attorneys for Plaintiff*

**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

**PLAINTIFFS' MOTION TO  
SUPPLEMENT THE RECORD  
ON THEIR MOTION FOR  
SANCTIONS (ECF DOC. 101)**

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Plaintiffs respectfully move the Court to supplement the record on their Motion for Sanctions (ECF Doc. 101) with the recently obtained affidavit of Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) representative Don Adams that bears directly on the issues pending before this Court.

Defendants were contacted regarding this Motion and object. A brief in support of this Motion is being filed contemporaneously herewith.

DATED 24<sup>th</sup> day of March, 2022.

MEYER, SHAFFER & STEPANS PLLP

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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