

Exhibit D

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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

**DECLARATION OF
JAMES C. MURNION**

_____)

ARIANE ROWLAND, and JAMIE)	
SCHULZE)	Cause No. CV 20-59-BLG-SPW
Plaintiff,)	
vs.)	
)	
WATCHTOWER BIBLE AND TRACT)	
SOCIETY OF NEW YORK, INC., and)	
WATCH TOWER BIBLE AND TRACT)	
SOCIETY OF PENNSYLVANIA,)	
)	
Defendants.)	
)	

I, James C. Murnion, an attorney duly admitted to practice law in this Court, declares that the following is true and correct:

1. I am one of Plaintiffs’ counsel-of-record in this case. As such, I am fully familiar with the facts and circumstances stated herein.
2. I submit this Declaration in support of Plaintiffs’ Financial Affidavit regarding the fees and costs expended litigating Watch Tower Bible and Tract Society of Pennsylvania’s (“WTPA”) Motion to Dismiss. Motion to Dismiss and Brief in Support (CV 20-52-BLG-SPW Doc. 13 & 14; CV-20-59-BLG-SPW-TJC Doc 9 &10) (referred to herein as “WTPA ’s Motion”).
3. I am an associate at Meyer, Shaffer, and Stepan, I specialize in complex civil litigation representing plaintiffs. I was admitted to practice in Montana in 2016 and have continuously maintained active and good standing with the bar since. I was an Editor at the Montana Law Review before graduating in

2016 and upon graduating served for one year as a Law Clerk for Federal District Court Judge Samuel Haddon in this federal district. I possess the requisite skills, experience, and reputation for attorneys in Montana to warrant the reasonable hourly rate set forth above.

4. My ordinary and customary rate is \$200/hour.

5. I personally prepared the itemization of my time spent litigating WTPA's Motion, which is attached as **Exhibit 1**.

6. I did not keep contemporaneous records of the time I expended litigating WTPA's Motion.

7. Therefore, I reconstructed the time I expended by reviewing:

a. My calendar.

b. The complete discovery served and answered pertaining to the WTPA's Motion.

c. The record of correspondence between counsel pertaining to litigation over WTPA's Motion.

d. The pleadings filed with the Court pertaining to WTPA's Motion

e. The record of Jehovah's Witness documents assigned to me to review and summarize for responding to WTPA's Motion (a spreadsheet identifying these documents is attached as **Exhibit 2**).

- f. The billing and attendance records of video and telephone conferences I attended that pertained to litigation over WTPA's Motion.
 - g. My Affidavit (Doc. 88-2) and associated time-keeping spreadsheet from a prior grant of attorneys' fees in this case and entered the same time for the tasks also included in **Exhibit 1**.
8. I then used the following process to create conservative billing entries for my time as follows:
- a. For all tasks not included in my prior Affidavit, and because billing entries were not created contemporaneously, my goal was to ensure that each entry reflected less time than the associated task actually required. As such, I generally used the following formulas to estimate time spent on each task: one minute per page of evidentiary document review; three minutes per page of court filing/discovery review; one half hour per page of discovery I drafted; one-half hour per opening/response brief and one-quarter hour per reply brief for my final citation/formatting review. In reality, I estimate, on average, I spent at least twice this amount of time on each task. Specifically, with evidentiary document review,

I generally recall spending weeks at a time meticulously reading thousands of pages of dense, religious terminology-filled documents published and/or printed by WTPA, looking for proverbial “needles in a haystack” that proved WTPA had substantial contacts with Montana. While these efforts obviously bore fruit, one-minute per page is a very low estimate for this task.

- b. Moreover, while I customarily create and draft the first version of all briefs filed with the Court, I have not included any of that time here (except for the final Response Brief to the Motion to Dismiss due to the enormity of that task) to avoid any appearance of double billing for the same documents with Ryan Shaffer, the senior attorney writing and signing all such briefs.
- c. Therefore, such entries are a conservative estimate of the time actually expended.
- d. For meetings amongst Plaintiffs’ legal team, my office was able to recover time records of all Teams and conference calls, as well as minutes for each, such that meetings related to the Motion to Dismiss were included in **Exhibit 1**, and meetings pertaining to other issues during the same time frame were not.

- e. For my one trip to this Court, I estimated ten hours roundtrip from Missoula to Billings based on google maps; the fee for such hours was reduced by 50% because that is the discount we apply to client billing for attorney travel.
- f. Finally, I applied the time to my customary rate of \$200/hour to determine the total fee for each step in defeating the Motion to Dismiss and ultimately prevailing on Plaintiffs' Motion for Sanctions.

9. Because most of my billing entries were not created contemporaneously, I endeavored to make sure that all entries were conservative by erring on the side of entering less time than I actually expended for each entry.

10. I specifically excluded from **Exhibit 1** many meetings, emails, phone calls, and discussions with my co-counsel related to litigating WTPA's Motion because they were not memorialized or recorded. For example, my co-counsel Ryan Shaffer and I work in the same office suite and frequently discussed, in person and at length, all manner of issues related to the WTPA's Motion. However, I have made no attempt to include such time on **Exhibit 1** because there is no objective guidepost to tether a reasonable estimate to. Again, I have omitted from here any time spent drafting court filings, other than the final response brief

to WTPA's Motion, to avoid any appearance of double billing with Ryan Shaffer for drafting of the same documents. As a result, my itemization omits hundreds of hours of time that I actually spent litigating WTPA's Motion.

11. For the foregoing reasons, I certify that the time set forth in my billing entries is a conservative reflection of the time I actually expended in litigating WTPA's Motion.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 20th day of September, 2022.

By: /s/ James C. Murnion
James C. Murnion
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

Exhibit 1

JAMES MURNION TIME ENTRIES RE: HANDLING WTPA MOTION TO DISMISS ON PERSONAL JURISDICTION									
	Date	Event	Review of Incoming Doc	Legal Research re: Doc	Drafting Outgoing Doc.	Editing / Finalizing Outgoing Doc.	Teams Meetings / Conf. Calls	Travel Time (50% of hourly billing rate)	Time in Court
1	6/22/2020	WTPA's Motion to Dismiss ("MTD") Pursuant to Rule 12(b)(2) and Brief in Support	0.8						
2	7/9/2020	Attorney meeting re: Motion to dismiss and joint discovery plan					0.8		
3	7/13/2020	Response brief to MTD			1		0.5		
4	~7/13/2020 – ~3/20/2021	Review of Jehovah's Witness documents obtained from Defendants and Third Parties re: WTPA's role in the church and contacts with Montana (CAEKAERT/MAPLEY Bates 1–348, 1818–2717, 2735–39, 2745–65, 2773–96, 3049–3167, 3174–3233, 3266–68, 3642–4017; WTPA bates 21771–806, 22163–294, 22327–23118, 28731–954, 30311–574, 33861–34084, 36507–699, 36704–67, 36992–37023, 56037–59160, 6,923 total pages)	115.4						
5	8/5/2020	Motion to supplement the record re: MTD		0.2					
6	8/14/2020	WTPA's brief in opposition to Motion to supplement the record re: MTD	0.3						
7	10/8/2020	Attorney meeting re: document and information management; scope of jurisdictional discovery; 1st round of jurisdictional discovery to WTPA					1.1		
8	10/14/2020	First jurisdictional discovery to WTPA				8			
9	10/14/2020	Order re: jurisdictional discovery scheduling	0.1						
10	10/19/2020	Brief re: scope of jurisdictional discovery		1					
11	11/11/2020	Attorney meeting re: protective order; motion to conduct discovery on Mapley/WTNY; 2nd jurisdictional discovery to WTPA and 1st to WTNY					1		
12	11/17/2020	Second jurisdictional discovery to WTPA			2.5				
13	11/17/2020	First jurisdictional discovery to WTNY			1.25				
14	11/20/2020	WTPA's responses to first jurisdictional discovery	1.5						
15	11/30/2020	Order re: scope of jurisdictional discovery	0.2						
16	12/15/2020	Letter from Wilson re: supp. discovery and elder interviews	0.1						
17	12/15/2020	WTPA's first supp. responses to first jurisdictional discovery	0.1						
18	12/17/2020	Subpoena duces tecum to hardin congregation		0.2	1				
19	12/17/2020	Attorney meeting re: finalizing SDT to Hardin Congregation; additional jurisdictional discovery to WTPA/WTNY; documents/correspondence received from WTPA					1.7		
20	12/22/2020	Attorney meeting with consultant re: WTPA's role in the church					3		
21	12/28/2020	Letter from Funyak re: subpoena duces tecum to hardin congregation	0.1						

22	12/29/2020	WTPA's responses to second jurisdictional discovery	1.5					
23	12/29/2020	WTNY's responses to first jurisdictional discovery	1					
24	1/5/2021	Attorney meeting with consultant re: WTPA's role in the church					2.5	
25	1/6/2021	Attorney Meeting re: Hardin Congregation Subpoena and ongoing Jurisdictional Discovery					1.1	
26	1/7/2021	Letter from Funyak re: subpoena duces tecum to hardin congregation	0.2					
27	1/15/2021	WTPA's first supp. responses to second jurisdictional discovery	0.25					
28	1/15/2021	Attorney meetign re: documents received from WTPA, disocvery disputes, serving additional discovery before 1/25 deadline, legal research on personal jurisdiction					0.4	
29	1/19/2021	Letter from Funyak re: Subpoena duces tecum to hardin congregation + scope of representation	0.2					
30	1/19/2021	Letter to Wilson re: WTPA's jurisdictional discovery responses			2			
31	1/22/2021	Letter from Funyak re: Subpoena duces tecum to hardin congregation + scope of representation	0.2					
32	1/22/2021	Letter from Wilson re: WTPA's discovery responses	0.5					
33	1/25/2021	Third jurisdictional discovery to WTPA			6			
34	1/25/2021	Second jurisdictional discovery to WTNY			3.75			
35	2/2/2021	Letter from Funyak re: subpoena duces tecum to hardin congregation	0.1					
36	2/11/2021	Attorney Meeting re: Hardin Congregation Subpoena and ongoing Jurisdictional Discovery					1	
37	2/12/2021	Letter from Wilson re: WTPA and WTNY discovery responses	0.5					
38	3/8/2021	Email to Wilson re: WTNY's jurisdictional discovery responses	0.1					
39	3/8/2021	WTPA's responses to third jurisdictional discovery	1.5					
40	3/9/2021	Email from Dunn re: re: WTNY's jurisdictional discovery responses	0.1					
41	3/16/2021	Letter from Wilson re: deposition of WTPA	0.2					
42	3/22/2021	2 letters from Wilson re: WTPA's and WTNY's jurisdictional discovery responses	0.5					
43	3/22/2021	WTPA's second supp. re: responses to first jurisdictional discovery	0.1					
44	3/23/2021	Attorney meeting re: discovery disputes					1.1	
45	3/26/2021	Letter to Wilson re: WTPA's and WTNY's jurisdictional discovery responses						
46	3/31/2021	WTNY's first supp. responses to first jurisdictional discovery	0.1					
47	4/2/2021	Attorney meeting re: discovery disputes					1.1	
48	4/7/2021	Letter from Funyak re: Subpoena duces tecum to hardin congregation	0.1					
49	4/8/2021	Letter from Wilson re: WTPA's and WTNY's jurisdictional discovery responses	0.5					
50	4/13/2021	Order re: deadline for completion of jurisdictional depositions	0.1					
51	4/19/2021	WTNY's second supp. responses to first jurisdictional discovery	0.1					

52	4/19/2021	WTPA's second supp. responses to third jurisdictional discovery	0.1						
53	4/20/2021	Brief re: Motion to compel jurisdictional discovery				0.5			
54	4/21/2021	Brief re: Motion to compel Hardin Congregation subpoena duces tecum		2		0.5			
55	4/28/2021	Letter from Funyak re: Motion to compel	0.3						
56	5/4/2021	Hardin Congregation's motion and brief to permissively intervene	0.2						
57	5/5/2021	Order re: Hardin Congregation's motion and brief to permissively intervene	0.1						
58	5/5/2021	Hardin Congregation's response to motion to compel subpoena duces tecum	0.6						
59	5/11/2021	WTPA and WTNY's response to motion to compel jurisdictional discovery	2						
60	5/12/2021	WTPA and WTNY's joinder in hardin congregation's opposition to motion to compel	0.1						
61	5/14/2021	Reply brief re: Motion to compel Hardin Congregation subpoena duces tecum		0.5		0.25			
62	5/20/2021	WTPA's third supp. responses to third jurisdictional discovery	0.1						
63	5/20/2021	Attorney meeting re: motions to compel + upcoming oral arguments					1.1		
64	5/25/2021	Reply brief re: Motion to compel jurisdictional discovery				0.25			
65	6/2/2021	Oral argument re: Motion to compel Hardin Congregation subpoena duces tecum						10	1
66	6/15/2021	Attorney meeting re: motions to compel + upcoming oral arguments					1.3		
67	6/17/2021	Mock hearing re: motion to compel jurisdictional discovery					1.7		
68	6/30/2021	Order re: Motion to compel Hardin Congregation subpoena duces tecum	1						
69	7/30/2021	Order re: Motion to compel Hardin Congregation subpoena duces tecum	0.3						
70	8/10/2021	Attorney meeting re: documents relevant to personal jurisdiction					2.3		
71	8/11/2021	Letter to Funyak re: redaction of subpoena duces tecum documents			1				
72	8/12/2021	Letter from Funyak re: redaction of subpoena duces tecum documents	0.1						
73	8/12/2021	Hardin Congregation's request for clarification	0.2						
74	8/24/2021	Order re: motion to compel jurisdictional discovery	0.25						
75	8/26/2021	Attorney meeting re: documents relevant to personal jurisdiction and forthcoming response to MTD					1.3		
76	8/30/2021	Order re: redaction of subpoena duces tecum documents	0.1						
77	9/2/2021	Letter from Wilson re: impropriety of MTD	0.1						
78	9/2/2021	Attorney meeting to discuss affidavit of fees and costs on Motion to Compel, review of Watchtower financial documents, Brumley depo., SDT to Hardin.					0.8		
79	9/3/2021	Letter from Funyak w/ unredacted subpoena duces tecum documents	0.5						
80	9/9/2021	Statement of attorney fees and costs re: motion to compel			1				

81	9/15/2021	Order granting motion for scheduling order	0.1							
82	9/21/2021	WTPA's third supp. re: responses to first jurisdictional discovery	0.1							
83	9/21/2021	WTPA's second supp. responses to second jurisdictional discovery	0.6							
84	9/21/2021	WTNY's third supp. responses to first jurisdictional discovery	0.5							
85	9/21/2021	WTPA's fourth supp. responses to third jurisdictional discovery	1							
86	10/18/2021	Attorney meeting to discuss personal jurisdiction brief and potential Rule 11 letter					1.2			
87	10/25/2021	Letters to Wilson, Taylor with Rule 11 motion/brief attached		0.5						
88	~8/1/2021 – 11/4/2021	Review all documents flagged in document management spreadsheet as potentially PJ relevant, decide which to use in PJ brief (approximately 2500 pages)	41.6							
89	11/5/2021	WTPA's notice of withdrawal of MTD	0.1							
90	11/5/2021	Response brief to WTPA's MTD		5	30	0.5				
91	12/3/2021	Brief re: Motion for sanctions		5		0.5				
92	1/10/2022	Reply brief re: Motion for sanctions		1		0.25				
93	3/16/2021	Mock hearing re: motion for sanctions					1.8			
	Time Totals		176.5	17.4	55.5	3.25	26.3	10	1	Grand Total \$56,990
	Hourly Rate		\$200	\$200	\$200	\$200	\$200	\$100	\$200	
	Total Fee		\$35,300	\$3,480	\$11,100	\$650	\$5,260	\$1,000	\$200	

Exhibit 2

PRODUCED BY/ BATES PREFIX	BATES NUMBER	DOCUMENT DATE	DOCUMENT DESCRIPTION	RVW ATTORNEY
CAEKAERT/MAPLEY	000001-000002	3/10/1983	1983-03-10 WTNY Ltr to Elders re Not. of Disfellowship & Disassociation.	JAMES
CAEKAERT/MAPLEY	000003-000005	9/20/1984	1984-09-20 WTNY Ltr to Elders re Judicial Cases & Disassociations	JAMES
CAEKAERT/MAPLEY	000006	5/15/1987	1987-05-15 WTPA Ltr. to Elders re Ecclesiastical Priv.	JAMES
CAEKAERT/MAPLEY	000007	1/2/1995	1995-01-02 WTPA Ltr to Elders re Pre. App to Gilead School	JAMES
CAEKAERT/MAPLEY	000008	3/4/1997	1997-03-04 WTPA Ltr to Elders re Child Abusers	JAMES
CAEKAERT/MAPLEY	000009	9/18/1970	1970-09-18 WTPA Ltr to Elders	JAMES
CAEKAERT/MAPLEY	000010-000019	1979	1979 MT Sessions Laws	JAMES
CAEKAERT/MAPLEY	000020-000025	7/1/1989	1989-07-01 WTNY Ltr to Congregations from Watchtower	JAMES
CAEKAERT/MAPLEY	000026-000028	3/14/1997	1997-03-14 WTNY Ltr. to Elders	JAMES
CAEKAERT/MAPLEY	000029-000031	5/9/2002	2002-05-09 WTPA Ltr. to Panorama BBC re Child Abuse	JAMES
CAEKAERT/MAPLEY	000032-000305	4/2020	2020-04 Leaked Elder's Manual	JAMES
CAEKAERT/MAPLEY	000306-000315		Docs referencing JW- specifically mention Gunner Hain and/or Martin Svensen	JAMES

CAEKAERT/MAPLEY	000316-000320	1974 & 1976	Revised Codes of MT 1974 and 1976	JAMES
CAEKAERT/MAPLEY	000321-000324		Setting Record Straight The Atlantic Article	JAMES
CAEKAERT/MAPLEY	000325-000339		Watchtower Child Abuse Pedophile Policy and related court cases	JAMES
CAEKAERT/MAPLEY	000340-000341	1/21/1999	1999-01-21 WTPA Lrt to Elders re Child Abuse	JAMES
CAEKAERT/MAPLEY	000342-000343	1/11/1995	1995-01-11 WTPA Ltr to Elder re Victims of Child Abuse	JAMES
CAEKAERT/MAPLEY	000344-000348	12/7/1999	USDC E. Dist of NY Case: CV-96-4849 (CV-96-5161 & CV-96-461) Pl's Supp. Exhibit in Support of Mt for Leave to File 2nd Amended Complaint and to Add	JAMES
CAEKAERT/MAPLEY	001818-002081	12/15/1977	1977-12-15 Branch Organization WTPA	JAMES
CAEKAERT/MAPLEY	002082-002256	2/2003	2003-02 Branch Organization	JAMES
CAEKAERT/MAPLEY	002257-002424	1/2015	2015-01 Branch Organization	JAMES
CAEKAERT/MAPLEY	002425-002681	8/2018	2018-08 Branch Organization	JAMES
CAEKAERT/MAPLEY	002682-002684	12/1/1989	1989-12-01 Watchtower Magazine	JAMES

CAEKAERT/MAPLEY	002686-002687	2/20/1943	1943-02-20 WTPA Ltr. to Co. Pub. of The New World	JAMES
CAEKAERT/MAPLEY	002688-002689	3/20/1943	1943-03-20 WTPA Ltr. to All Servants	JAMES
CAEKAERT/MAPLEY	002690-002691	3/20/1943	1943-03-20 WTPA Ltr. to Pub. of the Theocracy Everywhere	JAMES
CAEKAERT/MAPLEY	002692-002693	2/20/1944	1944-02-20 WTPA Ltr. to All Servants	JAMES
CAEKAERT/MAPLEY	002694-002695	3/10/1944	1944-03-10 WTPA Ltr. to Educators in Freedom	JAMES
CAEKAERT/MAPLEY	002696-002697	3/1/1945	1945-03-01 WTPA Ltr. to Co. Pub.	JAMES
CAEKAERT/MAPLEY	002698-002699	1/21/1946	1946-01-21 WTPA Ltr. to All Servants	JAMES
CAEKAERT/MAPLEY	002700-002701	2/20/1946	1946-02-20 WTPA Ltr. to Pub. of Kingdom	JAMES
CAEKAERT/MAPLEY	002702-002703	2/25/1946	1946-02-25 WTPA Ltr. to All Theocratic Servants	JAMES
CAEKAERT/MAPLEY	002704-002705	3/21/1946	1946-03-21 WTPA Ltr. to	JAMES
CAEKAERT/MAPLEY	002706-002707	2/24/1947	1947-02-24 WTPA Ltr. to Consecrated Christian Witnesses	JAMES
CAEKAERT/MAPLEY	002708-002709	5/10/1947	1947-05-10 WTPA Memo on Religious Census	JAMES
CAEKAERT/MAPLEY	002710-002711	10/23/1947	1947-10-23 WTPA Ltr. to All Companies & Pioneers	JAMES
CAEKAERT/MAPLEY	002712-002713	1/20/1948	1948-01-20 WTPA Ltr. to All of God's Ministers of Good News	JAMES
CAEKAERT/MAPLEY	002714-002715	2/20/1948	1948-02-20 WTPA Ltr. to Expansion Minded Ministers of God	JAMES

CAEKAERT/MAPLEY	002716-002717	3/22/1948	1948-03-22 WTPA Ltr. to Servants of God	JAMES
CAEKAERT/MAPLEY	002735	9/4/1954	Pittsburgh Sun Article	JAMES
CAEKAERT/MAPLEY	002736-002737	5/6/1955	1955-05-06 WTPA Ltr. to All Congregations	JAMES
CAEKAERT/MAPLEY	002738-002739	4/23/1956	1956-04-23 WTPA Ltr. to All Congregations	JAMES
CAEKAERT/MAPLEY	002745-002746	1/10/1994	1944-01-10 WTPA Ltr. to Assoc. of Free Nation of Keeping Truth	JAMES
CAEKAERT/MAPLEY	002748-002749	11/1/1995	1995-11-01 WTPA Information regarding ownership of kingdom halls	JAMES
CAEKAERT/MAPLEY	002750	8/1/1996	1996-08-01 WTPA Remittance forms for Society Kingdom Hall loans	JAMES
CAEKAERT/MAPLEY	002753	8/1/1997	1997-08-01 WTPA Remittance forms for Society Kingdom Hall loans	JAMES
CAEKAERT/MAPLEY	002754-002756	9/1/1998	1998-09-01 WTPA Key Facts About the Kingdom Hall Assistance	JAMES
CAEKAERT/MAPLEY	002757	11/1/1999	1999-11-01 WTPA The Society Kingdom Hall Fund	JAMES
CAEKAERT/MAPLEY	002758-002761	1/15/2001	2001-01-15 The Watchtower Publication - How the Governing Body Differs from a Legal Corporation	JAMES
CAEKAERT/MAPLEY	002762	9/8/2001	2001-09-08 WPTA Ltr. To Elder re Soviet Union	JAMES

CAEKAERT/MAPLEY	002763-002765	12/1/2004	2004-12-01 WTNY Key Facts About the Kingdom Hall Assistance	JAMES
CAEKAERT/MAPLEY	002773-002774	11/20/1947	1947-11-20 WTPA Ltr. to All Companies of JW in US	JAMES
CAEKAERT/MAPLEY	002775-002776	4/15/1952	1952-04-15 WTPA Ltr. to Kingdom Publishers	JAMES
CAEKAERT/MAPLEY	002777	11/16/1954	1954-11-16 WTPA Ltr. to All Congregations	JAMES
CAEKAERT/MAPLEY	002778-002779	4/1988	1988-04 S-10 Congregation Analysis Report	JAMES
CAEKAERT/MAPLEY	002780-002781	1989	Notification of Disfellowshipping or Disassociation form	JAMES
CAEKAERT/MAPLEY	002782-002787	7/1/1989	1989-07-01 WTNY Ltr. to US Bodies of Elders	JAMES
CAEKAERT/MAPLEY	002788	2/3/1993	1993-02-03 WTNY Ltr. to US Bodies of Elders	JAMES
CAEKAERT/MAPLEY	002789-002790	8/1/1995	1995-08-01 WTNY Ltr. to Elders re Victims of Child Abuse	JAMES
CAEKAERT/MAPLEY	002791-002793	3/14/1997	1997-03-14 WTNY Ltr to Elder re Child Abuse	JAMES
CAEKAERT/MAPLEY	002794-002795	Undated	Ltr To All Company Servants	JAMES
CAEKAERT/MAPLEY	002796	4/29/2008	2008-04-29 Ltr. to Brother Tucker (Circuit Overseer Equals Governing Body)	JAMES
CAEKAERT/MAPLEY	003049-003051	3/20/1947	1947-03-20 WTPA Ltr. to Each Servant of God	JAMES
CAEKAERT/MAPLEY	003174-003233	1970	Yearbook of Jehovah's Witnesses	JAMES

CAEKAERT/MAPLEY	003266-003268	09/01/1998	1998-09-01 WTPA Key Facts About the Kingdom Hall Assistance Arrangement	JAMES
CAEKAERT/MAPLEY	003642-003864	3/31/2014	Depo. Transcript - Richard Ashe	JAMES
CAEKAERT/MAPLEY	003865-004017	4/1/2014	Depo. Transcript - Ashe Richard	JAMES

DOCUMENT DATE	DOCUMENT DESCRIPTION	RVW ATTORNEY
4/10/1944	1944-04-10 WTPA Ltr. to All Companies of JW	JAMES
3/15/1943	1943-03-15 WTPA Ltr. to The Watchtower Subscriber	JAMES
4/26/1943	1943-04-26 WTPA Ltr. to all New World Pub.	JAMES
5/12/1948	1948-05-12 WTPA Ltr. to All Companies of JW in US	JAMES
6/22/1948	1948-06-22 WTPA Ltr. to Brother	JAMES
2/20/1951	1951-02-20 WTPA Ltr. to Publishers	JAMES
2/20/1952	1952-02-20 WTPA Ltr. to Kingdom Publishers	JAMES
7/24/1998	WTPA Ltr. To Elders re Serious Crime	JAMES
10/29/1997	Ltr. No. 121 to Australia WTPA	JAMES
2/12/1998	WTPA Resp. to Ltr. No. 121	JAMES
12/31/1998	WTPA Ltr. To Elders re Child Abuse	JAMES
1989	Int Bible Students Assn of Can v Halton Hills	JAMES
7/15/1997	S-2 Form - Recc. For New Elder and Ministerial Servant Appointment (Filled Out)	JAMES
2001	S-2-E Form (Blank)	JAMES
2012	S-2-E Form (Blank)	JAMES

BATES NUMBER	DOCUMENT DATE	DOCUMENT DESCRIPTION	RVW ATTORNEY
021771-021806		Bible Topics of Discussion	JAMES
022163-022294	1986	Examining the Scriptures Daily	JAMES
022327-022458	1987	Examining the Scriptures Daily	JAMES
022459-022590	1988	Examining the Scriptures Daily	JAMES
022591-022722	1989	Examining the Scriptures Daily	JAMES
022723-022854	1990	Examining the Scriptures Daily	JAMES
022855-022986	1991	Examining the Scriptures Daily	JAMES
022987-023118	1992	Examining the Scriptures Daily	JAMES
028731-028954	1983	Organized to Accomplish our Ministry	JAMES
030311-030574	3/1/1986	Branch Organization Manual	JAMES
033861-034084	1989	Organized to Accomplish our Ministry	JAMES
036507-036699	1992	Theocratic Ministry School Guidebook	JAMES
036704-036735	1978	JW - Jehovah's Witnesses in the Twentieth Century	JAMES
036736-036767	1979	JW - Jehovah's Witnesses in the Twentieth Century	JAMES
036992-037023	1989	JW - Jehovah's Witnesses in the Twentieth Century	JAMES
056037-056424	1973	1973 - Yearbook of the Jehovah's Witnesses	JAMES
056425-056812	1974	1974 - Yearbook of the Jehovah's Witnesses	JAMES
056813-057200	1975	1975 - Yearbook of the Jehovah's Witnesses	JAMES
057201-057592	1976	1976 - Yearbook of the Jehovah's Witnesses	JAMES
057593-057984	1977	1977 - Yearbook of the Jehovah's Witnesses	JAMES
057985-058376	1978	1978 - Yearbook of the Jehovah's Witnesses	JAMES
058377-058768	1979	1979 - Yearbook of the Jehovah's Witnesses	JAMES
058769-059160	1980	1980 - Yearbook of the Jehovah's Witnesses	JAMES