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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., and)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA.,)
)
Defendants,)
)
_____)

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

**PLAINTIFFS' MOTION TO
STRIKE AND ORDER
DEPOSITIONS TAKEN AS
NOTICED**

Plaintiffs Tracy Caekaert and Camillia Mapley, by and through undersigned counsel, hereby respectfully request the Court (1) strike or reject all arguments raised for the first time in Defendant Watchtower Bible and Tract Society of New

York, Inc.’s (“WTNY”) Reply Brief in Support of Motion for Protective Order Pursuant to Fed. R. Civ. P. 26(c) (Doc. 247); and (2) order the depositions of Gary Breaux, Allen Shuster, and Gene Smalley taken as noticed for August 30 through September 1, 2023, pursuant to Rule 26(c)(2) of the Federal Rules of Civil Procedure. A supporting brief is filed contemporarily herewith. L.R. 7.1(d)(1)(A). Likewise, the propriety of these depositions has been briefed previously three times by Plaintiffs; such briefs are incorporated by reference. Pls.’ Br. in Supp. of Their Mot. to Compel Deps. (Doc. 154); Pls.’ Reply in Supp. of Their Mot. to Compel Deps. (Doc. 170); Pls.’ Resp. in Opp’n to Def. WTNY’s Mot. for Protective Ord. (Doc. 243). If the Court finds it appropriate to conduct a hearing on these matters before the scheduled depositions, Plaintiffs’ counsel will be available. L.R. 7.1(e). Counsel for WTNY was contacted regarding this motion and indicated that WTNY objects. L.R. 7.1(c)(1).

DATED this 29th day of June, 2023.

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
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