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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.

Cause No. CV 20-52-BLG-SPW

**AFFIDAVIT OF JON A. WILSON
IN SUPPORT OF DEFENDANT
WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.'S RESPONSE BRIEF IN
OPPOSITION TO PLAINTIFFS'
MOTION TO STRIKE AND
ORDER DEPOSITIONS TAKEN AS
NOTICED**

STATE OF MONTANA)

: ss.

County of Yellowstone)

I, Jon A. Wilson, being duly sworn, depose and state as follows:

1. I am an attorney admitted to practice in the State of Montana. I am a shareholder with Brown Law Firm, P.C.
2. I am co-counsel for Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), in the above-entitled matter, have personal knowledge of the facts set forth herein, and am otherwise competent to testify.
3. The purpose of this Affidavit is to provide the foundation for and verification of the accuracy of the documents attached hereto in support of WTNY's Response Brief in Opposition to Plaintiffs' Motion to Strike and Order Depositions Taken as Noticed.
4. Attached as Exhibit 1 is a true and correct copy of a letter from WTNY's counsel to Plaintiffs' counsel, with copy to Watchtower Bible and Tract Society of Pennsylvania's counsel, dated June 21, 2023.
5. Attached as Exhibit 2 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel, without exhibits, dated April 26, 2023.
6. Attached as Exhibit 3 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel dated May 1, 2023.

7. Attached as Exhibit 4 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel dated May 15, 2023.

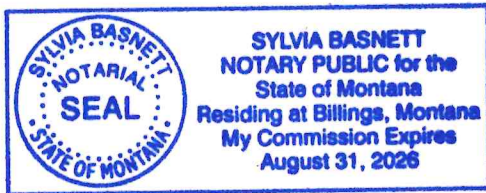
Further this Affiant sayeth naught.


DATED this 13th day of July, 2023.



Jon A. Wilson

SUBSCRIBED and SWORN to before me by Jon A. Wilson on this 13th day of July, 2023.



By: 

Notary Public for the State of Montana

CERTIFICATE OF SERVICE

I hereby certify that, on July 13, 2023, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan/Ryan R. Shaffer/James C. Murnion
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
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3. Matthew L. Merrill (appearing *pro hac vice*)
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4. Gerry P. Fagan/Christopher T. Sweeney/Jordan W. FitzGerald
MOULTON BELLINGHAM PC
P.O. Box 2559
Billings, MT 59103-2559
5. Bruce G. Mapley Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

<u>1-4</u>	CM/ECF	<u> </u>	Fax
<u> </u>	Hand Delivery	<u> </u>	E-Mail
<u>5</u>	U.S. Mail	<u> </u>	Overnight Delivery Services

By: /s/ Jon A. Wilson
Jon A. Wilson
BROWN LAW FIRM, P.C.
*Attorneys for Defendant Watchtower
Bible and Tract Society of New York,
Inc.*

Affidavit of Jon A. Wilson in Support of Defendant Watchtower Bible and Tract Society of New York, Inc.'s Response Brief in Opposition to Plaintiffs' Motion to Strike and Order Depositions