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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 FOR
PROTECTIVE ORDER RE:
WTPA’S FOURTH
DISCOVERY REQUESTS TO
PLAINITFFS**

Plaintiffs Tracy Caekaert and Camillia Mapley, by and through undersigned counsel, move pursuant to Fed. R. Civ. Pro. 26(c) for a protective order forbidding Defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) from

conducting discovery into the matters sought in its Fourth Discovery Requests, including: (1) discovery into briefing filed at the Ninth Circuit Court of Appeals; and (2) discovery into the pre-filing investigation conducted by Plaintiffs' lawyers.

A Brief in Support of this Motion is being filed contemporaneously herewith, along with a complete copy of WTPA's Fourth Discovery Requests.

CERTIFICATION OF CONFERRAL EFFORTS

Pursuant to Fed. R. Civ. Pro. 26(c) and L.R. 26.3(c)(1) the undersigned certifies that extensive efforts were made to resolve the discovery disputes at issue in this Motion, but were unsuccessful:

- On Friday, August 18th, counsel for the parties held a phone conference where Plaintiffs counsel detailed their concerns with WTPA's discovery and requested that the discovery requests be modified. WTPA's counsel stated that it believed the discovery was proper and would not agree to modify them.
- Plaintiffs' counsel followed up the August 18th phone call with detailed written correspondence, including examples of modifications to the discovery that would eliminate Plaintiffs' concerns and permit substantive answers.
- On August 31, 2023, WTPA agreed to modify its requests for production but would not agree to any modification of the interrogatories.

- Because WTPA's Requests for Production are still tied directly to the disputed Interrogatories disputes over all of the discovery requests remained unresolved.
- Thereafter, counsel for both parties remained engaged through phone calls and email correspondence to try and resolve Plaintiffs' concerns with the discovery requests but were unable to make additional progress on resolution.

DATED this 8th day of September, 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
MEYER, SHAFFER & STEPANS PLLP
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