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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

**DEFENDANT WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC.'S MOTION FOR  
ORDER DIRECTING RULE 35,  
FED. R. CIV. P. EXAMS**

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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**COMES NOW**, Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”), by and through its attorneys of record, and respectfully moves for an Order Directing Rule 35, Fed. R. Civ. P., mental examinations of the Plaintiffs Tracy Caekaert and Camillia Mapley by Michael Bütz, Ph.D. This Motion is Supported by WTNY’s Brief in Support, which has been filed contemporaneously herewith.

Pursuant to L.R. 7.1(c)(1), Counsel for WTNY has engaged in exhaustive conferral with counsel for the Plaintiffs. While the parties reached agreement about a few aspects of the proposed mental examinations, considerable disagreement remains as to the time, place, manner, conditions, and scope of the proposed mental examinations.



**CERTIFICATE OF SERVICE**

I hereby certify that, on September 27, 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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5. Bruce G. Mapley Sr.  
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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/ Brett C. Jensen  
Brett C. Jensen  
Michael P. Sarabia  
BROWN LAW FIRM, P.C.

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Bible and Tract Society of New York,  
Inc.*