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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  
LEAVE TO FILE MOTION  
FOR RECONSIDERATION**

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Pursuant to L.R. 7.3, Plaintiffs Tracy Caekaert and Camillia Mapley respectfully move the Court for Leave to File a Motion for Reconsideration regarding application of the clergy-penitent privilege to Document 39 being

withheld by the Watchtower Bible and Tract Society of New York (“WTNY”).

Counsel for WTNY was contacted and opposes this Motion. A brief in support of this Motion is being filed contemporaneously herewith.

DATED this 6<sup>th</sup> day of October, 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

*Attorneys for Plaintiffs*