

***Exhibit E***

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA )  
MAPLEY, )

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

Plaintiffs, )

**DECLARATION OF  
CAMILLIA MAPLEY**

vs. )

WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC., and )  
WATCH TOWER BIBLE AND TRACT )  
SOCIETY OF PENNSYLVANIA., )

Defendants, )

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I, Camillia Mapley, a Plaintiff in the above captioned case, declare that the following is true and correct:

1. I reside in Jamieson, Victoria, Australia with my 11 year-old son, Adler.
2. I am the sole caretaker for Adler.
3. Adler's biological father is Phillip Marshall.
4. Adler has not spoken to Mr. Marshall since July of 2023.
5. Adler has not stayed the night with Mr. Marshall since March of 2021.
6. I work approximately 25 hours a week as an Assistant Manager at the local general store.
7. Adler attends school three days per week, and I homeschool him two days per week.
8. Because of an established history of physical and emotional violence towards me and Adler, a Temporary Intervention Order was issued against Mr. Marshall by The Department of Public Prosecution.
9. I am currently awaiting a hearing in which it will be determined if the Intervention Order will be extended for 1-3 years.
10. At present, Adler does not have a passport to travel to the United States.
11. Because I am currently the only caregiver for Adler and his biological father represents a significant threat, I do not know how I could travel to the United States without leaving Adler vulnerable and uncared for.



12. I am currently working with a mediator and the Australian court system to obtain a passport so that Adler will have the ability to travel to the United States with me.

13. Adler and I depend on my salary for our living expenses, such as rent, food, etc.

14. Travelling to the United States for even a one-day exam would require me to miss a full week of work.

15. I currently have \$688.00 in my savings accounts.

16. After my employer deducts \$250.00 from my weekly take home pay for rent (\$1,000.00/month), I take home \$494.21 a week.

17. Therefore, travelling to the United States for a one day exam missing would require me to deplete my entire savings.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 24 day of October, 2023.

By: \_\_\_\_\_

Camillia Mapley