Jon A. Wilson Brett C. Jensen Michael P. Sarabia BROWN LAW FIRM, P.C. 315 North 24th Street P.O. Drawer 849 Billings, MT 59103-0849 Tel. (406) 248-2611 Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing pro hac vice) MILLER MCNAMARA & TAYLOR LLP 100 South Bedford Road, Suite 340 Mount Kisco, New York 10549 Tel./E-Fax (845) 288-0844 Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.

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

TRACY CAEKAERT, and CAMILLIA Cause No. CV 20-52-BLG-SPW 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.

**DEFENDANT WATCHTOWER** BIBLE AND TRACT SOCIETY OF **NEW YORK, INC.'S MOTION FOR** LEAVE TO FILE MOTION FOR RECONSIDERATION

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.	
Cross-Claimant,	
vs.	) )
BRUCE MAPLEY SR.,	
Cross-Claim Defendant.	 

COMES NOW, Defendant Watchtower Bible and Tract Society of New York, Inc. ("WTNY"), by and through its attorneys of record, and, pursuant to L.R. 7.3, respectfully moves the Court for leave to file a motion for reconsideration regarding the Court's Order dated October 27, 2023 (Doc. 281), granting Plaintiffs' Motion for Leave to File Motion for Reconsideration dated October 6, 2023 (Doc. 272). Pursuant to L.R. 7.1(c)(1), counsel for Plaintiffs have been contacted, and Plaintiffs oppose this Motion. This Motion is supported by the Brief in Support filed contemporaneously herewith.

DATED this 30<sup>th</sup> day of October, 2023.

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

## **CERTIFICATE OF SERVICE**

I hereby certify that, on October 30, 2023, a copy of the foregoing was served on the following person(s):

- 1. U.S. District Court, Billings Division
- Robert L. Stepans/Ryan R. Shaffer/James C. Murnion/Victoria K.M. Gannon
   MEYER, SHAFFER & STEPANS, PLLP
   430 Ryman Street
   Missoula, MT 59802
- Matthew L. Merrill (appearing pro hac vice)
   MERRILL LAW, LLC
   6631 Mariposa Court
   Denver, CO 80221
- 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:

1-4	CM/ECF	Fax
	Hand Delivery	E-Mail
5	U.S. Mail	Overnight Delivery Services
		By: /s/ Jon A. Wilson
		Jon A. Wilson / Brett C. Jensen /
		Michael P. Sarabia
		BROWN LAW FIRM, P.C.

Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.