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Attorneys for Plaintiffs

**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
SANCTIONS RE: WTNYS
NON-COMPLIANCE WITH
COURT ORDER (ECF No. 85)**

Plaintiffs Tracy Caekaert and Camillia Mapley, by and through undersigned counsel, hereby respectfully request the Court issue Rule 37(b)(2)(A) sanctions against Defendant Watch Tower Bible & Tract Society of New York, Inc.

(“WTNY”) for its willful violation of the Court’s Order, ECF No. 85. A brief in support is filed contemporaneously herewith. Plaintiffs certify they conferred in good faith with WTNY to avoid this motion, but a resolution could not be reached, and WTNY therefore opposes this motion.

DATED this 6th day of November, 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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