

Exhibit A

Guy W. Rogers
Jon A. Wilson
Brett C. Jensen
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 Defendants Watchtower Bible and Tract Society of New York, Inc.,
and Watch Tower Bible and Tract Society of Pennsylvania*

**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 WATCH TOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK INC.'S SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' SECOND SET OF
JURISDICTIONAL DISCOVERY**

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE,

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 20-59-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK, INC.’S SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS’ SECOND SET OF
JURISDICTIONAL DISCOVERY**

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and provides its

INTERROGATORY NO. 8: Please state how elders in each local congregation are selected and approved.

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: Please see documents produced by Watch Tower Bible and Tract Society of Pennsylvania (hereinafter “WTPA”), bates-numbered WTPA0028758-0028784.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, responsive documents have previously been produced by WTPA as WTPA0028758-0028784.

INTERROGATORY NO. 9: Identify what the governing body does, where it is located, what it is responsible for, how it makes decisions, etc.?

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and is vague and ambiguous as to the term "etc." Subject to and without waiving these objections: The Governing Body is a small group of spiritually-mature Christians who provide spiritual guidance to Jehovah’s Witnesses worldwide. The Governing Body follows the pattern set by “the apostles and elders in Jerusalem” in the first century, who made important decisions on behalf

of the entire Christian congregation. (Acts 15:2) Like those faithful men, the members of the Governing Body are not the leaders of Jehovah's Witnesses. The Governing Body serves in Warwick, New York, U.S.A.

FIRST SUPPLEMENTAL ANSWER: WTNY restates and reiterates its objections and response noted above. Subject to and without waiving its objection: WTNY further responds that it is not the Governing Body of Jehovah's Witnesses, but upon information and belief, the Governing Body provides spiritual guidance and direction to all Jehovah's Witnesses, including, but not limited to, setting forth the scriptural beliefs and practices of the faith in conformance with the model set by first century Christians as recorded in the Bible. The Governing Body does not direct the day-to day affairs of any congregation of Jehovah's Witnesses, but, during the time period in question, experienced elders in New York (members of the religious order) acknowledged the appointment of congregation elders and ministerial servants. Acknowledgement of these appointments was communicated to congregations by WTNY.

INTERROGATORY NO. 10: Where is the church's United States "Branch Office" located?

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also vague and ambiguous as to the term "church."

INTERROGATORY NO. 15: Please set forth your description of the relationships between the following: Governing Body, WTPA, WTNY, United States Branch Office, United States District Offices, United States Circuit Offices, and local Kingdom Halls/congregations (including whether any of these bodies oversee or direct, in any way, the activities of any other of these bodies).

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. This request is also vague and ambiguous as to the terms “Circuit Offices” and “District Offices.” Subject to and without waiving these objections: WTNY is a not-for-profit corporation formed in 1909 under the laws of the State of New York, U.S.A. It is used by Jehovah's Witnesses in the United States to print Bibles and Bible-based literature. Some of that literature is used in connection with the ministry done by Jehovah's Witnesses, again in connection with Jesus' commission in Matthew 28: 19, 20. WTPA is a nonprofit corporation formed in 1884 under the laws of the Commonwealth of Pennsylvania, U.S.A. It is used by Jehovah's Witnesses to support their worldwide work, which includes publishing Bibles and Bible-based literature. Congregations form for the purpose of allowing Jehovah's Witnesses and others interested in attending their meetings to gather together to worship God. At their own choice, congregations may form corporations or trusteeships to own property used as Kingdom Halls (meeting places). Those that do

not form a corporation or trusteeship typically remain unincorporated associations. Each legal entity is separate and distinct from one another.

The United States Branch Office of Jehovah's Witnesses is a religious construct that cares for the spiritual interests of Jehovah's Witnesses in the United States. It has no legal or corporate control over any entity used by Jehovah's Witnesses.

The Governing Body of Jehovah's Witnesses is an ecclesiastical group of men who care for the spiritual interests of Jehovah's Witnesses worldwide. It has no legal or corporate control over any entity used by Jehovah's Witnesses. WTNY is unaware of any “United States District Offices” or “United States Circuit Offices” associated with the faith of Jehovah's Witnesses.

FIRST SUPPLEMENTAL ANSWER: WTNY restates and reiterates its objections and response noted above. Subject to and without waiving its objection: WTNY further responds that it is not the Governing Body of Jehovah’s Witnesses, but upon information and belief, the Governing Body provides spiritual guidance and direction to all Jehovah’s Witnesses, including, but not limited to, setting forth the scriptural beliefs and practices of the faith in conformance with the model set by first century Christians as recorded in the Bible. The Governing Body does not direct the day-to-day affairs of any congregation of Jehovah’s Witnesses, but, during the time period in question, experienced elders in New York (members of the

religious order) acknowledged the appointment of congregation elders and ministerial servants. Acknowledgement of these appointments was communicated to congregations by WTNY.

INTERROGATORY NO. 16: Please set forth your complete understanding of the location of each congregation in the state of Montana between 1960 and today.

ORIGINAL ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: WTNY has been unable to locate any historical data concerning the location of Kingdom Halls in Montana during the relevant time-period based on the information in its possession, custody, or control. Discovery is ongoing and WTNY will supplement its answer if responsive information is located. As to current congregations in Montana, a listing can be found at the following hyperlink,

<https://apps.jw.org/ui/E/meeting-search.html#/weekly-meetings>

and clicking on Montana on the map. As this information is available on the internet, it is as easily accessible to Plaintiffs as it is to WTNY.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTNY has made a further inquiry and has located a list of congregations in Montana believed to be in existence during the relevant time-