

Exhibit L

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October 23, 2023

VIA EMAIL and U.S. MAIL

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Re: *Tracy Caekaert and Camillia Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.*
USDC Billings Division 20-CV-52-SPW-TJC
File No. 78280.001

Ariane Rowland and Jamie Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.
USDC Billings Division 20-CV-59-SPW-TJC
File No. 78280.002

Dear Counsel:

We are writing in response to Ryan's letter of October 09, 2023, to address his concerns with WTNY's discovery responses. Ryan agreed, by email dated October 11, 2023, that WTNY could respond with supplemental discovery by October 23, 2023.

Ryan's first concern regards WTNY's answers to jurisdictional discovery Interrogatory Nos. 9 and 15, and asked for "a full and thorough answer" thereto. WTNY refers counsel to its Second Supplemental Responses to Plaintiffs' Second Set of Jurisdictional

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Discovery, dated September 21, 2021, wherein WTNY provided full and thorough answers to these Interrogatories in compliance with the Court's Order at Doc. 85.

Secondly, Ryan asked WTNY to provide further information about its search efforts in regard to various Requests for Production "in which no documents or information was provided." In response, please see the enclosed: (1) WTNY's Second Supplemental Responses to Plaintiffs' First Set of General Discovery (Caekaert); (2) WTNY's First Supplemental Responses to Plaintiffs' Second Set of Combined Interrogatories, Requests for Production, and Requests for Admission, and Second Supplemental Responses to Plaintiffs' Third Set (Caekaert); (3) WTNY's Second Supplemental Responses to Plaintiffs' First Set of General Discovery (Rowland); and (4) WTNY's First Supplemental Responses to Plaintiffs' Second Set of Combined Interrogatories, Requests for Production, and Requests for Admission, and Second Supplemental Responses to Plaintiffs' Third Set (Rowland).

Finally, regarding Request for Production Nos. 94 – 96 (Caekaert) and Nos. 92-94 (Rowland), as explained in WTNY's Responses to Plaintiffs' Sixth Set of Combined Discovery, WTNY has no way of determining what specific correspondence and/or communications formed the factual basis for the documents referenced in these Requests. As such, WTNY cannot further supplement these Requests with information identifying the specific correspondence and/or communications that formed the factual basis for the documents referenced in these Requests.

Sincerely,



Jon A. Wilson
Michael P. Sarabia
JAW/MPS
enclosures

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