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*Attorneys for Defendant 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 WTPA'S  
UNOPPOSED MOTION FOR  
LEAVE OF COURT TO FILE  
RESPONSE BRIEF TO  
PLAINTIFFS' MOTION FOR  
SANCTIONS RE: WTPA'S  
NON-COMPLIANCE WITH  
COURT ORDER  
(ECF NO. 85)**

Defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) respectfully requests leave of Court in order to file a response brief to “Plaintiffs’

Motion for Sanctions Re: WTNY's Non-Compliance with Court Order (ECF No. 85)", filed on November 6, 2023. (Doc. No. 287)

Plaintiffs' Motion for Sanctions is not directed at WTPA; it is only directed at WTNY. Therefore, WTPA is not a party to the Motion. However, some or all of the sanctions sought by Plaintiffs in their Motion for Sanctions would significantly impact WTPA. For example, Plaintiffs request in their Motion as a sanction against WTNY a ruling that "WTNY, WTPA, the US Branch Office, the Governing Body, and local congregations are all alter egos of each other" and are vicariously liable for each other's actions. (Doc. No. 288, at p. 17.) This sanction would obviously and drastically impact WTPA even though it is not a party to Plaintiffs' Motion for Sanctions.

WTPA requests respectfully the opportunity to respond to Plaintiffs' request for sanctions which would affect or impact WTPA. WTPA would only address the remedies sought in the Motion. It would not address the merits of the Motion or the discovery dispute, since the merits and the discovery dispute do not involve WTPA. WTPA requests to be allowed to file a response brief by November 27, 2023.

The undersigned contacted Plaintiffs' counsel about this Motion. Plaintiffs do not object to this Motion.

**DATED** this 20<sup>th</sup> day of November, 2023.

MOULTON BELLINGHAM PC

By /s/ Gerry P. Fagan

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**CERTIFICATE OF SERVICE**

I hereby certify that on 20<sup>th</sup> day of November, 2023, a copy of the foregoing was served on the following persons:

1. U.S. District Court, Billings Division
  
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By the following means:

<u>1, 2, 3</u> CM/ECF	<u>          </u> Fax
<u>          </u> Hand Delivery	<u>          </u> E-Mail
<u>4</u> U.S. Mail	<u>          </u> Overnight Delivery Services

By           /s/ Gerry P. Fagan            
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