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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' UNOPPOSED
MOTION FOR LEAVE TO
FILE DOCUMENTS
UNDER SEAL**

Pursuant to L.R. 5.2(b) Plaintiffs Tracy Caekaert and Camillia Mapley respectfully move the Court for Leave to file Exhibits B and C to their Reply Brief in Support of Their Motion for Sanctions re: WTNY's Non-Compliance with Court

Order (ECF No. 287) under seal. Defendant Watchtower Bible and Tract Society of New York (“WTNY”), who marked the documents as “Confidential” was contacted about this Motion, requested that the referenced documents be filed under seal, and does not object to this Motion.

EXHIBIT B

Exhibit B to Plaintiffs’ Reply Brief is a two-page letter outlining multiple instances of child sexual abuse.

EXHIBIT C

Exhibit C to Plaintiffs’ Reply Brief is a one-page Memorandum of Record outlining multiple instances of child sexual abuse at issue in this case.

BASIS FOR FILING EXHIBITS B AND C UNDER SEAL

The parties stipulated to, and the Court entered, a Stipulated Protective Order in this case that permits each party to designate certain categories of documents as CONFIDENTIAL and governs the handling and filing of such documents. *See* ECF Doc. 110-1, 111. Plaintiffs presume that WTNY marked Exhibit B and C as CONFIDENTIAL because they contain details and identifying information regarding child sex abuse that occurred decades ago. Pursuant to the Stipulated Protective Order, WTNY has requested that both documents be filed under Seal. Exhibits B and C were produced with redactions based on WTNY’s assertions of various privileges. Without WTNY’s consent no further redactions

can be made to Exhibits B and C which would permit the documents to be filed in the public record. Based on the foregoing Plaintiffs respectfully request permission to file Exhibits B and C under seal.

Pursuant to L.R. 5.2(e), Plaintiffs shall lodge Exhibits B and C under seal as directed by the Clerk's Office. Pursuant to L.R. 7.1, a proposed order is attached and will be emailed to spw_propord@mtd.uscourts.gov.

DATED this 4th day of December, 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

Attorneys for Plaintiffs