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**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’ REPLY BRIEF
IN SUPPORT OF THEIR
MOTION FOR SANCTIONS
RE: WTNY’S NON-
COMPLIANCE WITH COURT
ORDER (ECF No. 85) RE:
WTPA’S RESPOSNE**

Plaintiffs Tracy Caekaert and Camillia Mapley submit the following Reply
Brief in Support of their Motion for Sanctions re: Watchtower Bible and Tract
Society’s (“WTNY”) Non-Compliance with Court Order (ECF No. 85) re:

Defendant Watch Tower Bible and Tract Society of Pennsylvania's ("WTPA") Response.

WTPA argues that the first, third, and fourth sanctions sought against WTNY are not permissible because they would "significantly impact WTPA if granted." However, the first and third sanctions sought, by their very terms, do not affect WTPA's ability to defend itself in this case. The first requested sanction would restrict WTNY's ability to present evidence and argument; WTPA's ability to present evidence and argument would not be affected. The third requested sanction would strike some of WTNY's affirmative defenses; WTPA's affirmative defenses would not be affected. WTPA makes no showing how these two sanctions would impair its ability to present argument and defenses at trial. The fourth requested sanction would admittedly affect WTPA. As such, if the Court is convinced this sanction is inappropriate as applied to WTPA, it can simply remove WTPA from the list of entities in the requested sanction.

DATED this 4th day of December, 2023.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.3(d)(2), Plaintiff hereby certifies that this brief complies with the length requirement for briefs, and that this brief contains 187 words, excluding the caption, certificates of service, and compliance, table of contents, and authorities, and exhibit index.

By: /s/ Ryan Shaffer
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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
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