Robert L. Stepans
Ryan R. Shaffer
James C. Murnion
Victoria K.M. Gannon
Meyer, Shaffer & Stepans, PLLP
430 Ryman Street
Missoula, MT 59802
Tel: (406) 543-6929
Fax: (406) 721-1799
rob@mss-lawfirm.com
ryan@mss-lawfirm.com
james@mss-lawfirm.com
katy@mss-lawfirm.com

Matthew L. Merrill (appearing *pro hac vice*) Merrill Law, LLC 1401 Delgany St. #404 Denver, CO 80202 Tel: (303) 947-4453 matthew@merrillwaterlaw.com

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BILLINGS DIVISION

TRACY CAEKAERT, and CAMILLIA MAPLEY,) Case No. CV-20-52-BLG-SPW
Plaintiffs, vs.) PLAINTIFFS' NOTICE OF NON-COMPLIANCE WITH COURT ORDER
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., and WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA.,	(ECF NO. 293) AND MOTION FOR PROTECTIVE ORDER
Defendants,)))

Plaintiffs, by and through their counsel of record, provide this Notice that Defendants' retained expert, Dr. Michael Butz, has failed to comply with the Court's November 21, 2023, Order (ECF No. 293). As a result, Plaintiffs seek an

order protecting them from examination by Dr. Butz until he certifies that he will not conduct neuropsychological testing.

A brief in support of this Notice and Motion is being filed contemporaneously herewith. Defendant Watchtower Bible and Tract Society of New York, Inc. ("WTNY") was contacted and opposes this Motion.

DATED this 29th day of December, 2023.

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

Attorneys for Plaintiffs