

Exhibit B

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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

**DECLARATION OF
JESSICA YUHAS**

ARIANE ROWLAND, and JAMIE)	
SCHULZE)	Cause No. CV 20-59-BLG-SPW
Plaintiff,)	
vs.)	
)	
WATCHTOWER BIBLE AND TRACT)	
SOCIETY OF NEW YORK, INC., and)	
WATCH TOWER BIBLE AND TRACT)	
SOCIETY OF PENNSYLVANIA,)	
)	
Defendants.)	

I, Jessica Yuhas, declare that the foregoing is true and correct:

1. I am over the age of 21 years and am competent to and do state the facts and matters contained in this affidavit are true and based upon my personal knowledge.
2. I am a paralegal at Meyer, Shaffer & Stepan, PLLP.
3. My time expenditure was not kept contemporaneously, but sufficient records and documentation existed to provide a basis for reasonable, and indeed very conservative, expenditures of billable time for each task described below.
4. In some circumstances, my firm represents clients on an hourly fee basis where my ordinary and customary rate is \$75/hour.
5. We learned about prior litigation cases involving the Jehovah’s Witnesses’ entities (WTNY, WTPA, CCJW, various Congregation, etc.) through our consultants, references in documents we obtained from other Court cases,

Declaration of Jessica Yuhas
Caekaert and Mapley v. Watchtower Bible Tract of New York, Inc., et. al.
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documents produced by WTNY or WTPA, and internet searches (which include general searches for lawsuits and media articles about the Jehovah's Witnesses Organization).

6. Attached hereto as **Exhibit 1** is a list of all cases we've uncovered during our research. Prior to filing Plaintiffs' Motion for Sanctions re: WTNY's Non-Compliance with Court Order (Doc. 287) we independently obtained approximately 736 documents from these cases. These 736 documents constituted 34,917 pages of information to be reviewed.
7. Following the filing of the above Motion, I continued to obtain case documents, however, this time is not accounted for in this Declaration.
8. For each of the cases listed on Exhibit 1, I was tasked with obtaining a Docket Report. I did this by either contacting the appropriate Clerk of Court to request the Docket Report or by locating the Court's online repository and pulling the docket report myself. Because each Court is different, the process for locating cases and obtaining docket reports varies widely. I've obtained copies of 44 case docket reports. I estimate that it took between 5-10 minutes per case to locate the case docket report and save a copy to our system. At 5 minutes per case a conservative estimate of the time it took me to obtain 44 case docket reports is 4 hours.

9. Once the docket report was obtained and saved to our file, I reviewed it to determine which documents should be reviewed for our cases. On average the review of docket reports takes 30 seconds per page, however, due to the complexity of some cases and docket reports this could be as much as 1-2 minutes per page. I reviewed a total of 631 pages for docket reports. At 30 seconds per page, a conservative estimate of the time I spent reviewing 631 pages of docket reports is 5.25 hours.
10. Once the docket report was reviewed by me, I had a conversation with one of the firm's attorneys to discuss which documents we'd like to spend the time and money obtaining. On average these conversations took 30 minutes to complete, however, due to the length and complexity of some of the docket reports these calls could last as long as an hour. I reviewed a total of 45 docket reports. At 30 minutes per call, a conservative estimate of the time I spent discussing 45 docket reports with the firm's attorneys is 22.5 hours.
11. I then either contacted the Clerk of Court or went to the Court's online repository and obtained a copy of each document. Documents obtained from the Clerk of Court electronically or from the Court's online repository were saved to our filing system and cataloged into a document tracking

spreadsheet. Some Clerk of Court files were received as one large, combined document and had to be separated by individually filed documents. Because the process for requesting documents varied by each case and the Court in which each case was filed, the time required to obtain docket reports and case documents varied greatly. I conservatively estimate that I spent 120 hours requesting case documents.

12. Documents obtained from the Clerk of Court in paper form had to be scanned individually, saved to our filing system, and cataloged into a document tracking spreadsheet. Depending upon how the documents were received from the Clerk of Court the time spent saving documents, ensuring they were searchable, and cataloging them took between 2-3 minutes per document. Prior to filing Plaintiffs' Motion for Sanctions re: WTNY's Non-Compliance with Court Order (Doc. 287) we independently obtained approximately 736 documents from these cases. At 2 minutes per document, a conservative estimate of the time I spent saving the 736 documents, ensuring they were searchable, and cataloging them is 24.5 hours.

13. Once documents were properly saved and cataloged, they were individually reviewed by an attorney for relevant information, which was input into a tracking spreadsheet for future reference.

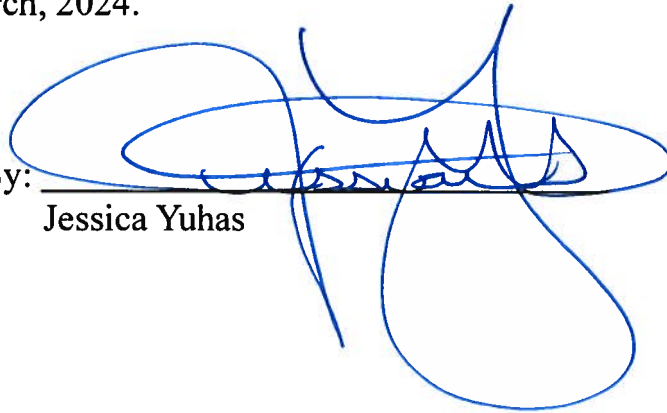
14. A conservative estimate of the time I spend finding cases, obtaining and reviewing docket reports, discussions with attorneys about docket reports and document requests, requesting case records, saving documents, and cataloging the same is 176.25 hours.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 7th day of March, 2024.

By: _____

Jessica Yuhas

A handwritten signature in blue ink, appearing to read 'Jessica Yuhas', is written over a horizontal line. The signature is stylized and somewhat cursive, with a large loop on the left side and a large loop on the right side.

Declaration of Jessica Yuhas

Caekaert and Mapley v. Watchtower Bible Tract of New York, Inc., et. al.

Rowland and Schulze v. Watchtower Bible Tract of New York, Inc., et. al.

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Exhibit 1

Case Number	Case Title	Court Information	Docket Page Count	Document Page Count
DV 16-84	Alexis Nunez and Holly McGowan v. Watchtower Bible Tract Society of New York, Inc., and Thompson Falls Congregation of Jehovah's Witnesses	Montana Twentieth Judicial District Court of Sanders County	14	1,118
04-2-02451-4	Aimey Merie Vigue and Kay Vigue v. Edward Norman Davis and Cheryle Davis, WTNY, WTPA, CCJW, and Opportunity Congregation of Jehovah's Witnesses	Superior Court of Washington, Spokane County	3	413
85-4012	Paul V. Watchtower Bible Tract Soc. of NY	9th Circuit COA	0	10
37-2010-00092450-CU-PO-CTL	John Dorman and Joel Gamboa v. Defendant Doe 1, La Jolla Church; Defendant Doe 2, Linda Vista Church; Defendant Doe 3, Supervisory Organization; Defendant Doe 4, Perpertrator; and Does 5-100	Superior Court of California, County of San Diego	9	896
CS-02-0190-EFS	Erica Rodriguez v. WTNY, Othello Spanish Congregation of Jehovah's Witnesses, & Manuel Beliz	USDC - Eastern District of Washington	4	544
HG11558324	Jane Doe (Conti) v. WTNY, WTPA, Governing Body, Jehovah's Witnesses on Peralta Blvd Fremont, Kingdom Hall of Jehovah's Witnesses, Jonathan Kendrick & Roes 1-10	Superior Court of California, County of Alameda	17	613

14CV-18423	Velicia Alston & John Roe v. WTNY & North Hillsboro Congregation of Jehovah's Witnesses	Circuit Court of Oregon, Multnomah County	17	184
37-2012-00099849-CU-PO-CTL	Jose Lopez v. Defendant Doe 1, Linda Vista Church; Defendant Doe 2, Supervisory Organization; Defendant Doe 3, Perpertrator; and Does 4-100	Superior Court of California, San Diego County	26	1,816
91,08-C-1	Amy B., v. Watchtower Bible and Tract Society of New York, Inc., Watchtower Bible and Tract Society of Pennsylvania, Inc., Christian Congregation of Jehovah's Witnesses, Dumas Congregation of Jehovah's Witnesses, Amarillo-Southwest Congregation of Jehovah's Witnesses and	District Court of the State of Texas for the County of Potter	11	179
30-2014-00741722-CU-PO-CJC	John Roe 1 & John Roe 2 v. DF Doe 1, Congregation (Laguna Hills Congregation); DF Doe 2, Supervisory Organization; DF Doe 3 Perpetrator; and Does 4-100	Superior Court of California, Orange County	36	1,368

A461675	Dawn Bradley, Amanda Cirone, Annette Reed, Donna Wilkes and Lori L. vs. Watchtower Bible and Tract Society of New York, Inc., Jehovah's Witnesses Nevada Circuit, Yerrington English Congregation of Jehovah's Witnesses, Inc., Watchtower Enterprise, Inc., Watchtowner Foundation, Inc., Watchtower Associates, Ltd., Kindgom Support Services, Inc., Christian Congregation of Jehovah's Witnesses, Religious Order of Jehovah's Witnesses, Daniel Steven Fitzwater, and Charles	District Court of the State of Nevada for the County of Clark	8	32
CV508137	Jason Cobb v. Ernest Brede, Luis Contreras, Larry Alverdure	Superior Court of California, County of San Mateo		245
26-22191	Charissa W. and Nicole D., v. Watchtower Bible and Tract Society of New York, Inc., Watchtower Bible and Society of Pennsylvania, Christian Congregation of Jehovah's Witnesses, Napa Kindgom Hall now doing business as Napa Congregation of Jehovah's Witnesses and Oak Knoll Congregation of Jehovah's Witnesses, and Does 1-20	Superior Court of California, County of Napa	42	6,764
13CV181057	Elizabeth McFarland v. West Congregation of Jehovah's Witnesses, WTNY & CCJW	Common Pleas Court, Lorain County	6	973
15CA010740	Elizabeth McFarland v. West Congregation of Jehovah's Witnesses, WTNY & CCJW	OH Ninth Judicial District Court of Appeals	3	31
130901293	Stephanie Fessler v. WTNY, CCJW & Spring Grove Congregation of Jehovah's Witnesses	Common Please Court First Judicial District	42	632
CI12898	Richard Churchfield and Lezly Churchfield and Lezly Churchfiled and GAL for minor Tina L. Churchfield v. Daniel Steven Fitzwater and Lynn Fitzwater, Yerington Kingdom Hall of Jehovah's Witnesses, Watchtower Bible and Tract Society of New York, Inc., and Does I-X.	Third Judicial District Court of the State of Nevada for the County of Lyon	0	35

DC-14-12402	John Doe I, John Doe II, Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, Jane Doe V, Jane Doe VI, & Jane Doe VII v. WTNY & WTPA	14th Judicial District Court, Dallas County	14	2,864
05-17-00362-CV	John Doe I, John Doe II, Jane Doe I, Jane Doe II, Jane Doe III, Jane Doe IV, Jane Doe V, Jane Doe VI, & Jane Doe VII v. WTNY & WTPA	TX Fifth District Court of Appeals	0	11
CV-2003-1439	West & Pence v. WTNY, WTPA, Watchtower Enterprises, LLC, Watchtower Foundation, Inc., Watchtower Associates, LTD, Kingdom Support Services, Inc., CCJW, Religious Order of JW, Woodland Congregation of JW, Quincy CA Congregation of JW, and Timothy Silva	Superior Court of California, County of Yolo	22	24
HNT-L-000336-19	Lynn Haggan & Tarah Bird v. WTNY, WTPA, CCJW & Donald Nicolson	Superior Court of New Jersey Law Division, Hunterdon County	10	2,166
06-C-15281	Jared Grafmyer v. Watchtower Bible and Tract Society of New York, Inc., Watchtower Bible and Tract Society of Pennsylvania, Inc. and Lancaster Congregation of Jehovah's Witnesses	Circuit Court of the State of Oregon for the County of Marion	7	245
2009-CA-2547	Rodmon Hollis v. Dean Mennis, WTNY & WTFL	Circuit Court of the Second Judicial Circuit, Leon County	15	0
52598	Julianne Wimberley Gutierrez and Joshua Wimberley v. Roes 1-10 and Does 110-120	Superior Court of California, County of Tehama	0	23

RG12619034	Joshua Hood, GAD for Amie Hood v. WTNY, English Congregation of Jehovah's Witnesses, Fremont CA Congregation of Jehovah's Witnesses dba North Congregation of Jehovah's Witnesses, Jonathan Kendrick & Does 1-10	Superior Court of California, County of Alameda	12	0
CIV20600 (Polk County) 03-2368C/B (Smith County)	Kaleena S. and Next Friend of Amanda M. v. Watchtower Bible and Tract Society of New York, Inc., Jehovah's Witnesses - East Congregation. Jehovah's Witnesses - White House Congregation, Watchtower Bible and Tract Society of Pennsylvania, Inc., and James Harvey	Disrtict Court of the State of Texas for the County of Smith	2	174
1CCV-20-0000390	N.D. v. Makaha, Hawaii Congregation of Jehovah's Witnesses, Makaha Congregation of Jehovah's Witnesses and Kingdom Hall, Makaha Congregation of Jehovah's Witnesses, WTNY, Kenneth L. Apana, and Does 1-100	Circuit Court of First Circuit State of Hawaii	77	670
SCV 16600	Ken L. v. Roes 1-10 and Does 110-120	Superior Court of California, County of Placer	2	21
316 M.D. 2020	Ivy Hill Congregation of Jehovah's Witnesses v. Commonwealth Pennsylvania, Department of Human Services	Commonwealth Court of Pennsylvania	11	721

030431	Leanna (Morley) Stone, Jessica Schroeder & Christina Vizenor v. North Albany Oregon Congregation of Jehovah's Witnesses, Inc., f/k/a Albany Oregon Company of Jehovah's J Witnesses, Inc., Watchtower Bible and Tract Society of New York, Inc., Watchtower Bible and Tract Society of Pennsylvania, Watchtower Enterprises, L.L.C., Watchtower Foundation, Inc., Watchtower Associates, LTD, Kindgom Support Services, Inc., Christian Congregation of Jehovah's Witnesses, Religious Order of Jehovah's Witnesses, The Watchtower Group, Inc., and North Bothell Congregation of Jehovah's	Circuit Court of the State of Oregon for the County of Linn	17	113
S-CV-0016723	Javier C. v. WTNY, WTPA, CCJW, Roseville Congregation, and Carlos Vasquez	Superior Court of California, County of Placer	3	0
26-23929	Tabitha H. v. Roes 1-100 and Does 110-120	Superior Court of California, County of Napa	12	35
SCV234140	Daniella A v. Oakland Congregation, CCJW, WTPA, and WTNY	Superior Court of California, County of	12	0
52594	Tim W. v. WTNY, WTPA, Watchtower Enterprise LLC, Watchtower Foundation Inc., Watchtower Associates, LTD, Kingdom Support Services, Inc., CCJW, Religious Order of Jehovah's Witnesses, North Congregation of Jehovah's Witnesses, Red Bluff CA, James Henderson, & Does 1-20	Superior Court of California, County of Tehama	9	22
500-06-000886-172	Lisa Balis v. WTCA, WTPA, WTNY, and CCJW	Superior Court of Canada, Providence of Quebec, District of Montreal	0	3

37-2013-00067529-CU-PO-CTL Appeal: D070723 (CA 4th Appellate Dist. Div. One)	Osbaldo Padron v. Playa Pacifica Spanish Congregation, Watchtower Bible and Tract Society of NY, Inc., and Defendant Doe 3	Superior Court of California, County of San Diego	17	2,176
D070723	Osbaldo Padron v. Playa Pacifica Spanish Congregation, Watchtower Bible and Tract Society of NY, Inc., and Defendant Doe 3	CA COA - Fourth Appellate District	0	1,581
2:14-cv-00205-cr	Annessa Lewis v. Bellos Falls Congregation of Jehovah's Witnesses, Bellows Falls, Vermont, Inc.; Watchtower Bible and Tract Society of New York, Inc.; and Norton True	USDC - District of Vermont	12	2,148
515069/2021	Santos Soto v. Yonkers Congregation of Jehovah's Witnesses, WTNY, Governing Body & Larry Cortez	Superior Court of New York, Kings County	0	2
210345	Tyler Charles Davidow v. North Albany OR Congregation, North Corvallis Congregation OR, WTNY, WTPA, Watchtower Associates, LTD, Kingdom Support Services, Inc., CCJW, Religious Order of JW, and Troy Christian McKenzie		16	0
2020CM001338	People v. Penkava, Michael M		0	740
7:11-cv-03656-CS	Lorterdam Properties at Ramapo I, LLC v. WTNY	USDC - Southern District of NY	9	124
MCC1300850	J.W. vs. Mountain View Congregation of Jehovah's Witnesses, French Valley Congregation of Jehovah's Witnesses, WTNY, & CCJW	Superior Court of California, County of Riverside	78	1,037
E066555	J.W. v. WTNY	CA COA - Fourth Appellate District	0	294

19-40	WTNY v. J.W.	SCOTUS	0	150
	Rita Williams v. Kingdom Hall of Jehovah's Witnesses, Roy Utah, WTNY, Harry Diamanti, Eric Stocker, Raulon Hicks, and Dan Harper.	Second Judicial District Court for Weber County	0	0
20170783	Ria Williams v. Kingdom Hall of Jehovah's Witnesses	Utah Court of Appeals - Second District	2	0
20190422	Ria Williams v. Kingdom Hall of Jehovah's Witnesses	Utah Supreme Court - Second District	2	165
LCV2020187211	Cornine Gravenese v. Phillip Zabel, Jehovah's Witness Kingdom Hall, John Doe 1-100, Dover Congregation of Jehovah's Witnesses, Belvidere Congregation of Jehovah's Witnesses, and WTNY	Superior Court of New Jersey Law Division, Cumberland County	8	682
See Below	See Below	See Below		
2018cv00609	Seungjin Kim v. Watch Tower Bible & Tract Society of PA, Watch Tower Bible & Tract Society of NY, Christian Congregation of Jehovah Witnesses, Religious Order of Jehovah's Witnesses, NY, Kindgom Support Services, Inc., NY, Watch Tower Bible & Tract Society of Australia, Watch Tower Bible & Tract Society of Canada, Apple, Inc., and Google, Inc.,	USDC - District of Columbia	2	0
2018cv00268	John Doe v. Watch Tower Bible & Tract Society of PA	USDC - Souther District of NY	4	0
2003cv00362	Jessie Samuel Rufus Benford v. Watch Tower Bible Tract Society, Jehovah's Witness - Halls Ferry Congregation, and Local Kindgod Hall of Jehovah's Witnesses - New Halls Ferry Congregation	USDC - Eastern District of Missouri	2	0
2012cv00623				500
2002cv02790	Peter Nexi Nedd v. Watch Tower Bible Tract Society	USDC - Eastern District of NY	2	0
2020cv00254	William Harding v. Watch Tower Bible & Tract Society of NY, Christian Congregation of Jehovah Witnesses, Christian Congregation of Jehovah Witnesses of Muskogee OK, Samuel Portis (Elder), and Frank Lee (Ministerial Servant)	USDC - Western District of Oklahoma	2	0

CV-13-4917	Jason Cobb v. Don Adams, Joel Adams, Allen Shuster, CCJW, Kingdom Support Services, Inc., Regional Building Committee of Jehovah's Witnesses, Inc., Religious Order of Jehovah's Witnesses, Inc., WTPA, English Congregation of Jehovah's Witnesses, Melno Park California, Inc., Daniel Kassabian, The County of Santa Clara, William Anthony Dixon, Jeff Keegan, Victoria Trask, The City of Melno Park, The County of San Mateo,	USDC - Northern District of California	6	166
LCV20211914643	Corinne Pandelo v. The Governing Body of Jehovah's Witnesses, Fairlawn Congregation of Jehovah's Witnesses, WTNY, Hackensack Congregation of Jehovah's Witnesses, and John and Jane Does 1-100	Superior Court of New Jersey Law Division, Bergen County	6	1,852
See Below	See Below	See Below		
2017-MC-00195	In re DMCA (Digital Millennium Copyright Act) Subpoena to Google, Inc.	USDC - Southern District of NY	0	18
2018-MC-00268	In re DMCA (Digital Millennium Copyright Act) Subpoena to YouTube (Google, Inc.)	USDC - Southern District of NY	0	33
2017-MC-00241	In re DMCA (Digital Millennium Copyright Act) Subpoena to GoDaddy.com, LLC	USDC - Southern District of NY	0	14
2018-MC-00177	In re DMCA (Digital Millennium Copyright Act) Subpoena to Microsoft Corporation	USDC - Southern District of NY	0	11
2018-MC-00076	In re DMCA (Digital Millennium Copyright Act) Subpoena to YouTube (Google, Inc.)	USDC - Southern District of NY	0	39
2019-MC-00085	In re DMCA (Digital Millennium Copyright Act) Subpoena to Google LLC (YouTube)	USDC - Southern District of NY	0	12
2018-MC-00362	In re DMCA (Digital Millennium Copyright Act) Subpoena to Facebook, Inc.	USDC - Southern District of NY	0	13
2018-MC-00179	In re DMCA (Digital Millennium Copyright Act) Subpoena to Google, Inc.	USDC - Southern District of NY	0	78
2019-MC-00260	In re DMCA (Digital Millennium Copyright Act) Subpoena to Scribd, Inc.,	USDC - Southern District of NY	0	14

2020-CV-03366	Watch Tower Bible & Tract Society of PA v. The Truth and Transparency Foundation, Ryan C. McKnight and Ethan G. Dodge	USDC - Southern District of NY	0	123
			631	34,917