

# Exhibit 4

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August 7, 2023

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Re: *Tracy Caekaert and Camillia Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.*  
USDC Billings Division 20-CV-52-SPW-TJC  
File No. 78280.001

*Ariane Rowland and Jamie Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.*  
USDC Billings Division 20-CV-59-SPW-TJC  
File No. 78280.002

Greetings:

We are writing in response to James' letter dated August 1, 2023, and Ryan's letter dated August 2, 2023. As to the question in James' letter, WTNY is in full compliance with the Court's Orders requiring searches of and production of responsive documents from the Service Department and CCJW. *See* Doc. 237 in *Caekaert*, Doc. 187 in *Rowland*.

As to the first and second bullet points in Ryan's letter, WTNY has no way of determining what "correspondence/communications" or "our records" are being referred

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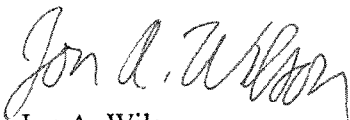
to in the documents identified, with the use of the term “communications” suggesting some of the references may have been to telephone calls. All documents related to the documents identified have either been produced, identified in the privilege log, or no longer exist.

Concerning the third bullet point, the Court has already considered Documents 27-40 in WTNY’s privilege log. The Court initially ruled Documents 35, 39, and 40 are protected by the clergy penitent privilege and were properly withheld by WTNY, at which time the Court decided to review Documents 27-34, 36, 37, and 38 *in camera*. See Doc. 239 in *Caekaert*, Doc. 186 in *Rowland*. Following the *in camera* review, the Court ruled that Documents 27, 28, 29, 32, 37, and 38 were to be produced with redactions described by the Court, and that Documents 30, 31, 33, 34, 36 did not need to be produced as they are privileged. See Doc. 251 in *Caekaert*, Doc. 197 in *Rowland*. In total, the Court has already ruled on Documents 27-40, and WTNY is in full compliance with the Court’s Orders regarding such documents so that no further production is necessary.

Turning to the fourth bullet point, it is unclear if the Court’s reasoning in Doc. 251 in *Caekaert*, Doc. 197 in *Rowland*, should impact Documents 75, 76, and 88, but WTNY is willing to produce the documents subject to the Stipulated Protective Order and with redaction of the names of persons not named or implicated in this litigation, as well as information obtained from a confession, provided that you agree that WTNY is not waiving any right to later challenge the production should it choose to do so.

Turning to the fifth bullet point, the Court already considered Document 38 and specifically ruled that “since third parties not involved in this litigation are named, the Court orders the redaction of their names.” See Doc. 251 in *Caekaert*, Doc. 197 in *Rowland*. By doing so, the Court obviously disagrees with your suggestion that “all of the people identified in this letter are ‘involved’ in this litigation[.]” WTNY’s production of Document 38 as WTNY003965-003967, and the redactions therein, are in full compliance with the Court’s Orders so that no further production is necessary.

Sincerely,



Jon A. Wilson  
Michael P. Sarabia  
JAW/MPS

cc: Joel M. Taylor (via e-mail)  
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