

Exhibit 5

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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., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-52-BLG-SPW
**DEFENDANT WATCHTOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK INC.'S RESPONSES
TO PLAINTIFFS' SIXTH SET OF
COMBINED DISCOVERY**

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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TO: Plaintiffs and their counsel, Robert L. Stepans, Ryan R. Shaffer, James C. Murnion, and Victoria K.M. Gannon, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and provides its responses to Plaintiffs’ Sixth Set of Combined Discovery as follows:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 94: Please produce the “correspondence / communications” referred to in your Fourth Supplemental Privilege Log Entries 87-93.

RESPONSE: WTNY has no way of determining what specific correspondence and/or communications formed the factual basis for the documents identified as Privilege Log Nos. 87-93. All documents related to the documents identified as Privilege Log Nos. 87-93 have either been produced, identified in the

privilege log, or no longer exist.

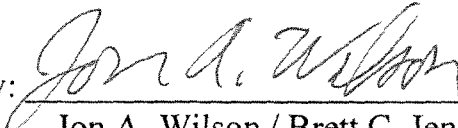
REQUEST FOR PRODUCTION NO. 95: Please produce all records / documents that formed the factual basis for the Memorandums of Record referred to in your Fourth Supplemental Privilege Log Entries 87-93.

RESPONSE: WTNY has no way of determining what specific records and/or documents formed the factual basis for the documents identified as Privilege Log Nos. 87-93. All documents related to the documents identified as Privilege Log Nos. 87-93 have either been produced, identified in the privilege log, or no longer exist.

REQUEST FOR PRODUCTION NO. 96: Please produce all records / documents that formed the factual basis for the Memorandums of Record SD000001, SD000002, and SD000003.

RESPONSE: WTNY has no way to determine what specific records and/or documents formed the factual basis for the documents bates stamped SD000001, SD000002, and SD000003. All documents that formed the factual basis for the documents bates stamped SD000001, SD000005, and SD000003 have either been produced, identified in the privilege log, or no longer exist.

DATED this 2nd day of October, 2023.

By: 
Jon A. Wilson / Brett C. Jensen /
Michael P. Sarabia
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc.*

VERIFICATION

Thomas Jefferson, Jr. states that he has read the foregoing (*Defendant WTNY's Responses to Plaintiffs' Sixth Set of Combined Discovery*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.


Thomas Jefferson, Jr.

Dated: 9/28/2023


CERTIFICATE OF SERVICE

I hereby certify that, on October 2nd, 2023, a copy of the foregoing
(Defendant WTNY's Responses to Plaintiffs' Sixth Set of Combined Discovery) was
served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepans/Ryan R. Shaffer/James C. Murnion/Victoria K.M. Gannon
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
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3. Matthew L. Merrill (appearing *pro hac vice*)
MERRILL LAW, LLC
6631 Mariposa Court
Denver, CO 80221
4. Gerry P. Fagan/Christopher T. Sweeney/Jordan W. FitzGerald
MOULTON BELLINGHAM PC
P.O. Box 2559
Billings, MT 59103-2559
5. Bruce G. Mapley Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

<u> </u> CM/ECF	<u> </u> Fax
<u> </u> Hand Delivery	<u> 2-4 </u> E-Mail
<u> 2-5 </u> U.S. Mail	<u> </u> Overnight Delivery Services

By: 

Jon A. Wilson / Brett C. Jensen /
Michael P. Sarabia
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*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc.*