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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

**PLAINTIFFS’ MOTION FOR  
SANCTIONS RE:  
DEPOSITIONS OF  
GARY BREAU AND  
ALLEN SHSUTER**

Plaintiffs, by and through counsel, move the Court for an order sanctioning Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) for

its bad faith conduct and discovery obstruction before and during the depositions of Gary Breaux and Allen Shuster.

A brief in support of this Motion is being filed contemporaneously herewith.

DATED this 18<sup>th</sup> day of April, 2024.

By: /s/ Ryan Shaffer  
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: /s/ Ryan Shaffer  
Ryan R. Shaffer  
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