

Exhibit 1

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*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,
and Watch Tower Bible and Tract Society of Pennsylvania*

**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 WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA’S RESPONSES
TO PLAINTIFFS’ FIRST SET OF
JURISDICTIONAL DISCOVERY**

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE,

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 20-59-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA’S RESPONSES
TO PLAINTIFFS’ FIRST SET OF
JURISDICTIONAL DISCOVERY**

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

COMES NOW Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter “WTPA”), by and through its attorneys, and responds to Plaintiffs’ First Set of Jurisdictional Discovery as follows:

INTERROGATORY NO. 11: Please identify all district overseers who served the Hardin congregation between 1970 and 1995.

ANSWER: Unknown.

INTERROGATORY NO. 12: Please identify all circuit overseers who served the Hardin congregation between 1970 and 1995.

ANSWER: Unknown.

INTERROGATORY NO. 13: Please identify all Jehovah's Witnesses congregations in Montana from 1970 to the present day.

ANSWER: Unknown.

INTERROGATORY NO. 14: Please identify all branch offices responsible for overseeing the Jehovah's Witnesses congregations in Montana.

ANSWER: Since 2001, the United States Branch Office of Jehovah's Witnesses provides ecclesiastical oversight and assistance to Montana congregations. Prior to 2001 there was no branch office for the United States; instead, ecclesiastical oversight was provided by members of the religious order of Jehovah's Witnesses without use of the religious construct known as a "branch office".

INTERROGATORY NO. 15: Please identify the presiding overseer(s) of the Hardin congregation from 1970 -1995.


ANSWER: Unknown.

DATED this 20th day of November, 2020.

By: Jon A. Wilson
Guy W. Rogers / Jon A. Wilson /
Aaron M. Dunn
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*

VERIFICATION

Philip Brumley states that he has read the foregoing (*Defendant WTPA's Responses to Plaintiffs' First Set of Jurisdictional 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.



Philip Brumley

Dated: November 16, 2020

CERTIFICATE OF SERVICE

I hereby certify that, on November 20th, 2020, a copy of the foregoing
(Defendant WTPA's Responses to Plaintiffs' First Set of Jurisdictional 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
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
Missoula, MT 59802

3. Bruce G. Mapley Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

<input type="checkbox"/> CM/ECF	<input type="checkbox"/> Fax
<input type="checkbox"/> Hand Delivery	<input type="checkbox"/> E-Mail
<input checked="" type="checkbox"/> 2-3 U.S. Mail	<input type="checkbox"/> Overnight Delivery Services

By: 

Guy W. Rogers / Jon A. Wilson /
Aaron M. Dunn
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*