

EXHIBIT J

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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.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cause No. CV 20-52-BLG-SPW

**DEFENDANT WATCHTOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK INC.'S RESPONSES
TO PLAINTIFFS' FIRST SET OF
GENERAL DISCOVERY**

	Cross-Claimant,)
)
vs.)
)
	BRUCE MAPLEY SR.,)
)
	Cross-Claim Defendant.)
)
)
)

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, 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' First Set of General Discovery as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Please describe all actions or steps you took to prevent acts of unlawful sexual conduct against Tracy Caekaert by Bruce Mapley Sr. or Gunner Hain.

ANSWER: WTNY objects to the form of this Interrogatory, which improperly begs the question of liability without any supporting evidence and instead improperly assumes WTNY had a legal duty to prevent the unlawful sexual conduct alleged by Plaintiff Tracy Caekaert from occurring.

the “two-witness rule” when investigating allegations of wrongdoing, including child sexual abuse.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 10: Please admit the “two-witness rule” requires that child sex abusers receive no discipline if the victim is the only witness and the abuser does not confess.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 11: Please admit that between 1960 and 1990, you trained elders of the Hardin Congregation on how to investigate and handle allegations of wrongdoing involving members of the Hardin Congregation, including child sexual abuse.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 12: Please admit local congregation elders were your agents from 1960 to 1995.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 13: Please admit ministerial servants within local congregations were your agents from 1960 to 1995.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 14: Please admit district overseers were your agents from 1960 to 1995.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 15: Please admit circuit overseers were your agents from 1960 to 1995.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 16: Please admit circuit overseers were informed in the 1970s and 80s that members, ministerial servants, and elders of the Hardin Congregation were committing child sexual abuse.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 17: Please admit district overseers were informed in the 1970s and 80s that members, ministerial servants, and elders of the Hardin Congregation were committing child sexual abuse.

ANSWER: Deny.

DATED this 25th day of March, 2022.

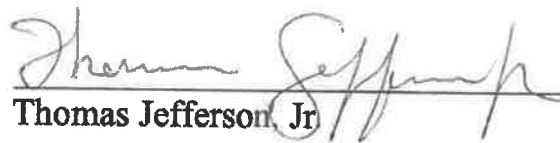
By: _____



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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' First Set of General 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: 3/28/2022