

EXHIBIT C

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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. Stepan, 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. 5: Please set forth the hierarchal structure and organization of the Jehovah's Witnesses, including a description of how congregations, districts, circuits, branches are all related.

ANSWER: WTPA is not the religion known as Jehovah's Witnesses. However, WTPA is aware that Kingdom Halls of Jehovah's Witnesses are places of worship that are independently owned and operated by corporations or trusteeships formed by congregations, and that congregations are made up of Christians (publishers), some of whom serve as elders or ministerial servants. Publishers, their children, and interested ones often worship together on a weekly basis. A Circuit is a group of congregations (approximately 20) in a geographical area that gather together for larger worship events twice a year. A District was a group of Circuits (approximately 10) in a geographical area that formerly worshipped together once a year. A Branch office is akin to a national office that provides ecclesiastical (religious) assistance to congregations. Circuits, Districts, and Branch offices are religious constructs without legal form and have no legal, financial, or contractual control over congregations.

INTERROGATORY NO. 6: Please identify each of your publications that you distributed to the Jehovah's Witnesses congregations during the time period 1970 to 1995.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Please admit the authenticity of documents produced by Plaintiffs as Bates 001818-002081.

RESPONSE: WTPA has made reasonable inquiry, and the information it knows or can readily obtain is insufficient to enable it to admit or deny, as the copy submitted contains underlining and typing that may have been added by the possessor of the publication. Unless and until each of these modifications can be verified, it will not be possible for WTPA to admit or deny the authenticity of the documents.

REQUEST FOR ADMISSION NO. 2: Please admit that in 1977, WTPA served as the “parent corporate agency of Jehovah’s Witnesses.”

RESPONSE: Admit in part and deny in part. WTPA admits that it was the “parent corporate agency” in the sense that it was the oldest corporate entity associated with Jehovah’s Witnesses and is the copyright holder of Jehovah’s Witnesses’ most prized asset, the *New World Translation* of the Bible. WTPA denies that it is the legal “parent” of co-defendant WTNY.

REQUEST FOR ADMISSION NO. 3: Please admit that in 1977, Watchtower Bible and Tract Society of New York was a subsidiary of WTPA.

RESPONSE: Deny. WTNY has no corporate parent and is not a “legal” subsidiary of any other entity. In a religious sense it is secondary or supplemental to WTPA in that it provides publishing services to WTPA.

REQUEST FOR ADMISSION NO. 4: Please admit that in 1977 WTPA notified persons endeavoring to donate to the Jehovah’s Witness church to make their contributions payable to WTPA.

RESPONSE: Admit in part and deny in part. WTPA admits that it accepts voluntary donations in support of its religious activities but denies that it “notified” persons to donate to it in 1977.

REQUEST FOR ADMISSION NO. 5: Please admit the authenticity of documents produced by as Bates 002082-002256.


RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 6: Please admit that in 2003 WTPA notified persons endeavoring to donate to the Jehovah’s Witness church to make their contributions payable to WTPA.

RESPONSE: Admit in part and deny in part. WTPA admits that it accepts voluntary donations in support of its religious activities but denies that it “notified” persons to donate to it in 2003.

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

DATED this 20th day of November, 2020.

By: Jon A. Wilson
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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*