

EXHIBIT E

Guy W. Rogers
Jon A. Wilson
Brett C. Jensen
BROWN LAW FIRM, P.C.
315 North 24th Street
P.O. Drawer 849
Billings, MT 59103-0849
Tel. (406) 248-2611
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)
MILLER MCNAMARA & TAYLOR LLP
100 South Bedford Road, Suite 340
Mount Kisco, New York 10549
Tel./E-Fax (845) 288-0844
*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 SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' SECOND 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 SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' SECOND 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 provides its

ORIGINAL ANSWER: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection, please see Answer to Interrogatory No. 20.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTPA's original Answer included responsive information.

INTERROGATORY NO. 22: Please identify all general counsels of WTPA from 1970 to 1995, including the dates each individual served as a general counsel.

ORIGINAL ANSWER: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject and without waiving this objection:

1973 – 1988: None.

December, 1988 – Present: Philip Brumley.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTPA's original Answer included responsive information.

INTERROGATORY NO. 23: Please identify all members of the Jehovah's Witnesses' governing body from 1970 to 1995, including the dates each individual was on the governing body.

ANSWER: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: WTPA does not maintain a list of members of the Governing Body of Jehovah's Witnesses. However, upon information and belief WTPA provides the following names of individuals (all of whom are now deceased):

1973: Frederick W. Franz, Raymond V. Franz, George D. Gangas, Leo K. Greenlees, John O. Groh, Milton G. Henschel, William K. Jackson, Nathan H. Knorr, Grant Suiter, Thomas J. Sullivan, and Lyman A. Swingle.

1974: Frederick W. Franz, Raymond V. Franz, George D. Gangas, Leo K. Greenlees, John O. Groh, Milton G. Henschel, William K. Jackson, Nathan H. Knorr, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Ewart C. Chitty, Charles J. Fekel, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, and Daniel Sydlik.

1975: Frederick W. Franz, Raymond V. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, William K. Jackson, Nathan H. Knorr, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Ewart C. Chitty, Charles J. Fekel, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, and Daniel Sydlik.

1976: Frederick W. Franz, Raymond V. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, William K. Jackson, Nathan H. Knorr, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Ewart C. Chitty, Charles J. Fekel, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, and Daniel Sydlik.

1977: Frederick W. Franz, Raymond V. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, William K. Jackson, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Ewart C. Chitty, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1978: Frederick W. Franz, Raymond V. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, William K. Jackson, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Ewart C. Chitty, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1979: Frederick W. Franz, Raymond V. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, William K. Jackson, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1980: Frederick W. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, William K. Jackson, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1981: Frederick W. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1982: Frederick W. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, Grant Suiter, Lyman A. Swingle, W. Lloyd Barry, John C. Booth,

Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1983: Frederick W. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1984: Frederick W. Franz, George D. Gangas, Leo K. Greenlees, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1985: Frederick W. Franz, George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1986: Frederick W. Franz, George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1987: Frederick W. Franz, George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, John E. Barr, and Martin Poetzinger.

1988: Frederick W. Franz, George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, and John E. Barr.

1989: Frederick W. Franz, George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, and John E. Barr.

1990: Frederick W. Franz, George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, and John E. Barr.

1991: Frederick W. Franz, George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, and John E. Barr.

1992: George D. Gangas, Milton G. Henschel, Lyman A. Swingle, W. Lloyd Barry, John C. Booth, Theodore Jaracz, Karl F. Klein, Albert D. Schroeder, Daniel Sydlik, Carey W. Barber, and John E. Barr.

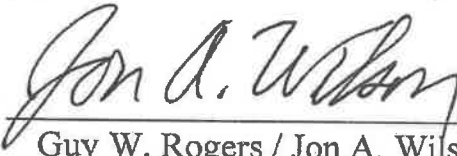
FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTPA's original Answer included responsive information.

INTERROGATORY NO. 24: Please identify all individuals and entities with an ownership interest in WTPA from 1970 to 1995, including the dates each individual or entity held such interest.

ORIGINAL ANSWER: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: None.

FIRST SUPPLEMENTAL ANSWER: Without waiving any previously asserted objections, WTPA's original Answer confirmed the Answer is none, as no individual or entity had an ownership interest in WTPA from 1970 to 1995.

DATED this 21st day of September, 2021.

By: 
Guy W. Rogers / Jon A. Wilson /
Brett C. Jensen
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 Second Supplemental Responses to Plaintiffs' Second 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: September 20, 2021