

Exhibit E

Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
Meyer, Shaffer & Stepan, PLLP
430 Ryman Street
Missoula, MT 59802
Tel: (406) 543-6929
Fax: (406) 721-1799
rob@mss-lawfirm.com
ryan@mss-lawfirm.com
james@mss-lawfirm.com

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.,)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA, and)
BRUCE MAPLEY SR.,)

Defendants,)

WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
Cross Claimant,)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

Case No. CV-20-52-BLG-SPW

**PLAINTIFF TRACY CAEKAERT'S
ANSWERS TO DEFENDANT
WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.'S FIRST
INTERROGATORIES TO
PLAINTIFF TRACY CAEKAERT**

Delbert Hiebert (date unknown); Rhonda Klessens (1975-1976); Michael Locke (1982-1983); Helen Evans (1988); Dennis Smith (1993-1994); Mike LNU (date unknown); Tom LNU (therapist) (1996); therapist in Glendale, AZ (name not known) (2014); Ian M. Sanders, MS, LPC, NCC (2020); Angela Gainan, BSN, MSW, LCSW, Treasure State Counseling (2021 – current); Trent Holmberg, MD (retained expert); David Caekaert (date unknown); Julie Potter Dunlap (date unknown); Plaintiff's lawyers and staff.

INTERROGATORY NO. 6: Please identify all persons who were eyewitnesses to the abuse you suffered.

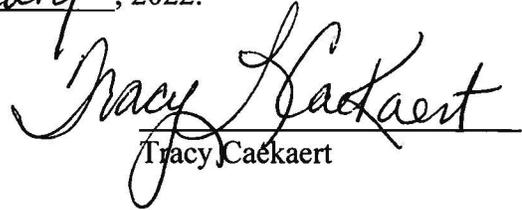
ANSWER: THIS ANSWER CONTAINS INFORMATION THAT IS PRIVATE, CONFIDENTIAL, AND SUBJECT TO THE PROTECTIVE ORDER GOVERNING THE USE AND DISCLOSURE OF SUCH INFORMATION (ECF DOC. 110, 111). Because the abuse at issue was many years ago, and because emotional trauma caused by sexual abuse impacts the memory of its victims, Plaintiff is not presently able to state, with certainty, every person who was an eyewitness. To the best of Plaintiff's recollection, the following people were witnesses to the abuse:

- Bruce Mapley, Sr.
- Camillia Mapley
- Rhonda Klessens Bell
- Gunner Hain
- Possibly Bruce Mapley, Jr.

DECLARATION/VERIFICATION

I have reviewed the foregoing Answers to Defendant Watchtower Bible and Tract Society of New York, Inc.'s First Set of Interrogatories and I declare under penalty of perjury under the law of the United States of America that the foregoing are true and correct.

EXECUTED ON THIS 14th day of February, 2022.


Tracy Caekaert