

Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
Victoria K.M. Gannon
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
katy@mss-lawfirm.com

Matthew L. Merrill (appearing *pro hac vice*)
Merrill Law, LLC
1401 Delgany Street, #404
Denver, CO 80202
Tel: (303) 947-4453
matthew@merrillwaterlaw.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., and)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA.,)
)
Defendants,)
)

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

**PLAINTIFFS' PROPOSED
AMENDMENTS TO FACTS
ESTABLISHED PRIOR TO
TRIAL**

Pursuant to this Court's order (ECF No. 388) Plaintiffs, by and through undersigned counsel, provide the Court with the following proposed amendments to facts (g) and (h) in the Court's original sanctions Order (ECF. No. 318). Based

upon the testimony and documents regarding the “U.S. branch Office” prior to 2001, Plaintiffs proposed facts “(g)” and “(h)” in ECF No. 318 be amended as follows:

(g) During the relevant time period, local congregation elders directed questions on how to follow Jehovah’s Witnesses polices to the “branch.”

(h) During the relevant time period, Jehovah’s Witnesses circuit overseers visited local congregations and reported on their activities to the “branch.”

A Proposed Order setting out the above referenced amendments is attached hereto and being emailed to spw_propord@mtd.uscourts.gov for the Court’s consideration.

DATED this 13th day of June, 2024.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs