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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., and WATCH TOWER BIBLE
AND TRACT SOCIETY OF
PENNSYLVANIA,

Defendants.

Cause No. CV 20-52-BLG-SPW

**DEFENDANTS WATCHTOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK, INC. AND
DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S
JOINT MOTIONS IN LIMINE**

Defendants Watchtower Bible and Tract Society of New York, Inc.

("WTNY") and Watch Tower Bible and Tract Society of Pennsylvania ("WTPA")

respectfully request that the Court enter an order in limine excluding the following evidentiary matters from further consideration in this case, including at trial:

1. Attempts to establish a standard of care for elders in a Jehovah's Witnesses' Congregation based on religious principles;
2. Attempts to redefine religious beliefs, practices, and procedures of Jehovah's Witnesses;
3. Attempts to disparage the reputation of Jehovah's Witnesses, and/or attacks on Jehovah's Witnesses beliefs, practices, and theology;
4. References to or discussion of other sexual abuse cases and allegations against Jehovah's Witnesses;
5. Conclusory statements and legal conclusions, including:
 - a. Attempts to state legal conclusions regarding agency or the roles of members of a Jehovah's Witnesses Congregation; and
 - b. Legal conclusions by Plaintiffs' accounting expert, Benjamin F. Yonce;
6. References to discovery conduct or sanctions issued in this or other cases;
7. References to allegations against Bruce Mapley, Sr. in other states and allegations made after the alleged sexual abuse in this case;
8. Testimony of Carla Klessens that is hearsay and/or irrelevant;
9. Testimony by Mark O'Donnell; and

10. Arguments about the “Golden Rule,” “Voice of the Community,” and Public Safety Standards.

These Motions will prevent the introduction of irrelevant, immaterial, and/or unfairly prejudicial evidence. Pursuant to L.R. 7.1(c)(1), Defendants have contacted Plaintiffs, who object to all of the foregoing Motions. The Motions are supported by an accompanying Brief.

DATED this 14th day of June, 2024.

MOULTON BELLINGHAM PC

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