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*Attorneys for Defendant 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.

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WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC., and  
WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA,

Case No. CV-20-00052-SPW-  
TJC

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
FILE RESPONSE TO  
PLAINTIFFS' MOTION FOR  
SANCTIONS**

Cross-Claimants,

-vs-

BRUCE MAPLEY SR.,

Cross-Defendant.

Defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) respectfully moves the Court to extend the time to file WTPA’s Response to Plaintiffs’ Motion for Sanctions (Doc. 101) up to and including Tuesday, December 28, 2021.

Counsel for WTPA have contacted Plaintiffs’ counsel, who do not object to this extension of time. Pursuant to L.R. 7.1(c)(3), a proposed order is filed herewith and emailed to the Court.

**DATED** this 17<sup>th</sup> day of December, 2021.

MOULTON BELLINGHAM PC

By /s/ Jordan W. FitzGerald  
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*Attorneys for Watch Tower Bible and  
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**CERTIFICATE OF SERVICE**

I hereby certify that on 17<sup>th</sup> day of December, 2021, a copy of the foregoing was served on the following persons:

- 1. U.S. District Court, Billings Division
- 2. Robert L. Stepan  
 Ryan R. Shaffer  
 James C. Murnion  
 MEYER, SHAFFER & STEPANS, PLLP  
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- 3. Guy W. Rogers  
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*Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.*
  - Joel M. Taylor, Esq. (*pro hac vice*)  
 MILLER MCNAMARA & TAYLOR LLP  
 100 South Bedford Road, Suite 340  
 Mount Kisco, NY 10549
- 4. Bruce G. Mapley, Sr.  
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 Birmingham, AL 35215

By the following means:

<u>1, 2, 3</u> CM/ECF	<u>          </u> Fax
<u>          </u> Hand Delivery	<u>          </u> E-Mail
<u>  4  </u> U.S. Mail	<u>          </u> Overnight Delivery Services

By   /s/ Jordan W. FitzGerald    
JORDAN W. FITZGERALD