

Exhibit A

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 St. #404
Denver, CO 80202
Tel: (303) 947-4453
matthew@merrillwaterlaw.com

Attorneys for Plaintiff

**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

**AFFIDAVIT OF
RYAN SHAFFER**

ARIANE ROWLAND, and JAMIE)	
SCHULZE)	Cause No. CV 20-59-BLG-SPW
Plaintiff,)	
vs.)	
)	
WATCHTOWER BIBLE AND TRACT)	
SOCIETY OF NEW YORK, INC., and)	
WATCH TOWER BIBLE AND TRACT)	
SOCIETY OF PENNSYLVANIA,)	
)	
Defendants.)	
)	

Pursuant to this Court’s Orders (ECF No. 411 in CV 20-52-BLG-SPW; ECF No. 342 in CV 20-59-BLG-SPW) I, Ryan Shaffer, an attorney duly admitted to practice law in this Court, submits the following Affidavit itemizing the expenses, and attorney’s fees “related to WTNY’s Motion for Protective Order and Plaintiffs’ Motion to Strike and preparing the instant motion.”

1. I am a partner at the law firm of Meyer, Shaffer & Stepan, PLLP, and represent Plaintiffs in this matter.

2. Attorney and paralegal time expenditures were not kept contemporaneously because Plaintiffs’ firm does not bill by the hour on this case. Nevertheless, as set forth below, sufficient information exists to provide a basis for reasonable estimates of the time spent on the matters at issue.

3. Regarding the preparation of legal briefs, this work was primarily completed by me. Associate attorney James Murnion reviewed and edited each

brief prior to filing. Paralegal Jessica Yuhas also reviewed each brief prior to filing, formatted the briefs for filing, prepared all exhibits for filing, and then filed the documents with the court's ECF system.

4. Based on my eighteen (18) years of experience litigating contested civil matters, I know that one page of well-researched and edited briefing typically requires one hour of attorney work. For the briefs at issue here, I completed 90% of the attorney work, and associate attorney, James Murnion completed 10%. In cases where our firm bills clients hourly Partners bill at \$300 per hour and associates bill at \$200 per hour.

5. I was able to review all of the correspondence between counsel between June 15, 2023 and June 22, 2023 leading up to Plaintiffs' Motion to Strike, and made conservative estimates of the time expended reviewing and drafting such correspondence.

6. Attorney fees. Applying the estimate of one hour per page for drafting the briefs at issue, and designating 90% of that time to me and 10% of that time to James Murnion, results in the following attorney fees:

- a. **WTNY's Motion for Protective Order (ECF No. 234, 243, 247 in CV 20-52-BLG-SPW; ECF No. 182, 190, 193 in CV 20-59-BLG-SPW)**

- i. Ryan Shaffer: .5 hours reviewing WTNY's Motion for Protective Order and Brief (\$150.00);
- ii. Ryan Shaffer: 24 hours drafting Plaintiffs' 27-page Response Brief (\$7,200.00);
- iii. James Murnion: 3 hours drafting Plaintiffs' 27-page Response Brief (\$600.00);
- iv. Ryan Shaffer: .5 hours reviewing WTNY's Reply Brief (\$150.00);
- v. Ryan Shaffer: .5 hours on 6/15/23 drafting email to Jon Wilson regarding WTNY's new subpoena argument (\$150.00);
- vi. Ryan Shaffer: .5 hours reviewing Jon Wilson's 6/16/23 response letter (\$150.00);
- vii. Ryan Shaffer: 2 hours on June 20, 2023 drafting letter to Jon Wilson regarding WTNY's new subpoena argument (\$600.00);
- viii. Ryan Shaffer: 1 hour on June 21, 2023 reviewing Jon Wilson's extensive letter regarding WTNY's new subpoena argument (\$300.00); and

- ix. Ryan Shaffer: 1 hour on June 22, 2023 drafting email correspondence to Defendants regarding WTNY's new subpoena argument (\$300.00)
- x. Total Attorney's fee resulting from WTNY's Motion for Protective Order: \$9,600.00

b. Plaintiffs' Motion to Strike (ECF No. 248, 249, 252 in CV 20-52-BLG-SPW; ECF No. 194, 195, 198 in CV 20-59-BLG-SPW)

- i. Ryan Shaffer: 20 hours drafting the 22-pages of briefing submitted in support of Plaintiffs' Motion to Strike (\$6,000.00); and
- ii. James Murnion: 2 hours drafting the 22-pages of briefing submitted in support of Plaintiffs' Motion to Strike (\$400.00).
- iii. Total Attorney's fee resulting from Plaintiffs' Motion to Strike: \$6,400.00

c. Plaintiffs' Motion for Sanctions (ECF No. 362, 363, 389 in CV 20-52-BLG-SPW; ECF No. 293, 294, 320 in CV 20-59-BLG-SPW)¹

- i. Ryan Shaffer: 4 hours drafting the 5 pages of briefing seeking sanctions for WTNY's pre-deposition conduct (\$1,200.00); and
- ii. James Murnion: 1 hour drafting the 5 pages of briefing seeking sanctions for WTNY's pre-deposition conduct (\$200.00).
- iii. Total Attorney's fee resulting from Plaintiffs' Motion for Sanctions (\$1,400.00).

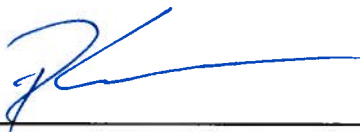
7. Paralegal Expenses. In addition to the time expended by Plaintiffs' attorneys, paralegal Jessica Yuhas edits, prepares, and files Plaintiffs' legal documents. By reviewing the briefs at issue, Ms. Yuhas has prepared a declaration setting forth an explanation of the time she expended editing, preparing, and filing

¹ Because Plaintiffs only prevailed on the portion of their Motion for Sanctions pertaining to WTNY's pre-deposition conduct they only seek fees for the pages of briefing dedicated to those arguments. Five (5) pages of briefing were dedicated to seeking sanctions of WTNY's pre-deposition conduct. *See* ECF 363 at 4-9 in CV 20-52-BLG-SPW; ECF No. 294 at 4-9 in CV-20-59-BLG-SPW.

the briefs at issue. **Exhibit 1**, Yuhás Dec. The total paralegal expenses are \$1,387.50.

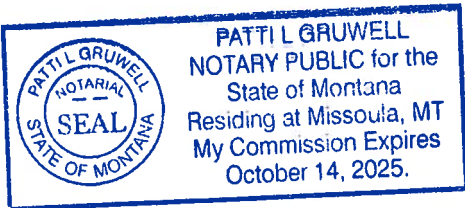
8. Based upon the foregoing and the documents supporting this Affidavit, I affirm and certify that the amount now being claimed is a conservative reflection of the actual time and expense spent litigating the matters at issue.

DATED this 10th day of July, 2024.

By: 
Ryan Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

State of Montana
County of Missoula

This instrument was signed and sworn to before me on July 10th, 2024 by
Ryan R. Shaffer.





(Notary Signature)
Patti L. Gruwell
Print Name of Notary Public
Notary Public for the State of MT
Residing at: Missoula, MT
My Commission Expires: 10/14/25

Exhibit 1

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 St. #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,)

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

Plaintiffs,)

**DECLARATION OF
JESSICA YUHAS**

vs.)

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

Defendants,)

_____)

ARIANE ROWLAND, and JAMIE)
SCHULZE,) Case No. CV 20-59-BLG-SPW
)
Plaintiffs,)
vs.)
)
WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC., and)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA.,)
)
Defendants,)
)
_____)

I, Jessica Yuhas, declare that the foregoing is true and correct:

1. I am over the age of 21 years and am competent to and do state the facts and matters contained in this affidavit are true and based upon my personal knowledge.
2. I am a paralegal at Meyer, Shaffer & Stepans.
3. I submit this Declaration in support of Plaintiffs' Statement of Expenses and Fees re: ECF No. 411 in CV 20-52-BLG-SPW; ECF No. 342 in CV 20-59-BLG-SPW.
4. My ordinary and customary rate is \$75/hour.
5. For all pleading documents filed with the Court, I perform the following tasks.

- a. Proofread checking for spelling, grammatical, and spacing errors, correcting same;
 - b. Double-check all citations;
 - c. Pull, organize, and label all referenced exhibits;
 - d. Create a duplicate filing for the Rowland/Schulze case where applicable;
 - e. Ensure all documents are the appropriate file type and size for filing in ECF.
 - f. File the document in ECF; and
 - g. Provide the required hard copy of any filings over 20 pages pursuant to L.R. 1.4 (c)(5) to Chambers.
6. The Court has ordered Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) to pay Plaintiffs’ expenses related to WTNY’s Motion for Protective Order (ECF No. 234 in CV 20-52-BLG-SPW; ECF No. 182 in CV 20-59-BLG-SPW), Plaintiffs’ Motion to Strike (ECF No. 248 in CV 20-52-BLG-SPW; ECF No. 194 in CV 20-59-BLG-SPW), and Plaintiffs’ Motion for Sanctions (ECF No. 362 in CV 20-52-BLG-SPW; ECF No. 293 in CV 20-59-BLG-SPW).

7. I did not keep contemporaneous records of my time spent on the briefing identified above.
8. Based on the number of pages of briefing and the number of exhibits involved, I have made conservative estimates of my time and erred on the side of entering less time than I actually spent for each entry. Those conservative entries are itemized as follows:
 - a. WTNY's Motion for Protective Order (ECF No. 234, 243, 247 in CV 20-52-BLG-SPW; ECF No. 182, 190, 193 in CV 20-59-BLG-SPW)
 - i. Plaintiffs' Response Brief in Opposition to Defendants WTNY's Motion for Protective Order (ECF No. 243 in CV 20-52-BLG-SPW; ECF No. 190 in CV 20-59-BLG-SPW) is a 33-page brief with 7 exhibits. I conservatively estimate I spent 4 hours executing the tasks outlined above for this brief.
 - b. Plaintiffs' Motion to Strike (ECF No. 248, 249, 252 in CV 20-52-BLG-SPW; ECF No. 194, 195, 198 in CV 20-59-BLG-SPW).
 - i. Plaintiffs' Brief in Support of Their Motion to Strike and Order Depositions Taken as Notices (ECF No. 249 in CV

20-52-BLG-SPW; ECF No. 195 in CV 20-59-BLG-SPW) is an 18-page brief with 14 exhibits. I conservatively estimate I spent 5 hours executing the tasks outlined above for this brief.

ii. Plaintiffs' Reply Brief in Support of Their Motion to Strike and Order Depositions Taken and Noticed (ECF No. 252 in CV 20-52-BLG-SPW; ECF No. 198 in CV 20 59-BLG-SPW) is a 6-page brief in no exhibits. I conservatively estimate I spent 1 hour executing the tasks outlined above for this brief.

c. Plaintiffs' Motion for Sanctions (EFC No. 362, 363, 389 in CV 20-52-BLG-SPW; ECF No. 293, 294, 320 in CV 20-59-BLG-SPW)

i. Plaintiffs' Brief in Support of Motion for Sanctions re: Depositions of Gary Breaux and Allen Shuster (ECF No. 363 in CV 20-52-BLG-SPW; ECF No. 294 in CV 20-59-BLG-SPW) is a 35-page brief with 17 exhibits. I conservatively estimate I spent 6 hours and 30 minutes executing the tasks outlined above for this brief in addition to reviewing the December 6, 2023 Allen Shuster deposition

transcript and creating the Index of Nonresponsive Answers filed as Exhibit M.

- ii. Plaintiffs' Reply Brief in Support of Motion for Sanctions re: Deposition of Gary Breaux and Allen Shuster (ECF No. 289 in CV 20-52-BLG-SPW; ECF No. 320 in CV 20-59-BLG-SPW) is a 10-page brief with 2 exhibits. I conservatively estimate I spent 2 hours executing the tasks outlined above for this brief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 10th day of July, 2024.

By:



Jessica Yuhas, Paralegal
MEYER, SHAFFER & STEPANS PLLP