

# ***Exhibit 1***

Guy W. Rogers  
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*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,  
and 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	)	Cause No. CV 20-52-BLG-SPW
MAPLEY,	)	
	)	
Plaintiffs,	)	<b>DEFENDANT WATCH TOWER</b>
	)	<b>BIBLE AND TRACT SOCIETY OF</b>
vs.	)	<b>PENNSYLVANIA'S RESPONSES</b>
	)	<b>TO PLAINTIFFS' THIRD SET OF</b>
	)	<b>JURISDICTIONAL DISCOVERY</b>
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,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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ARIANE ROWLAND, and JAMIE  
SCHULZE,

Plaintiffs,

vs.

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

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCH TOWER  
BIBLE AND TRACT SOCIETY OF  
PENNSYLVANIA'S RESPONSES  
TO PLAINTIFFS' THIRD SET OF  
JURISDICTIONAL DISCOVERY**

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TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"), by and through its attorneys, and responds to Plaintiffs' Third Set of Jurisdictional Discovery to Defendant WTPA as follows:

Defendant Watch Tower Bible and Tract Society of Pennsylvania's Responses to  
Plaintiffs' Third Set of Jurisdictional Discovery - 2

Production is improper. WTPA stands on its objection in that the entirety of the request is outside the scope and time-period permitted by the Court's discovery order.

**REQUEST FOR PRODUCTION NO. 75:** Please produce a copy of the publication entitled "*Organization For Kingdom-Preaching and Disciple-Making*".

**RESPONSE:** Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Request for Production is improper. WTPA stands on its objection in that the entirety of the request is outside the scope and time-period permitted by the Court's discovery order.

**REQUEST FOR PRODUCTION NO. 76:** Please produce a copy of the publication entitled "*Organization For Kingdom-Preaching and Disciple-Making*".

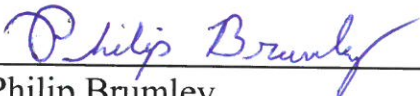
**RESPONSE:** Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Request for Production is improper. WTPA stands on its objection in that the entirety of the request is outside the scope and time-period permitted by the Court's discovery order.

**REQUEST FOR PRODUCTION NO. 76:** Please produce a copy of the following publications:

- ☐ Zion's Watch Tower and Herald of Christ's Presence, January 1885 issue.
- ☐ Zion's Watch Tower, August 1, 1895.

**VERIFICATION**

Philip Brumley states that he has read the foregoing (*Defendant WTPA's Responses to Plaintiffs' Third Set of Jurisdictional Discovery*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.

  
Philip Brumley

Dated: March 8, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 8<sup>th</sup>, 2021, a copy of the foregoing (*Defendant WTPA's Responses to Plaintiffs' Third Set of Jurisdictional Discovery*) was served on the following person(s):

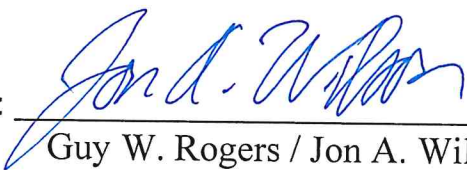
1. U.S. District Court, Billings Division
2. Robert L. Stepans  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802
3. Bruce G. Mapley Sr.  
3905 Caylan Cove  
Birmingham, AL 35215

by the following means:

\_\_\_\_\_ CM/ECF  
\_\_\_\_\_ Hand Delivery  
2-3 \_\_\_\_\_ U.S. Mail

\_\_\_\_\_ Fax  
2 \_\_\_\_\_ E-Mail  
\_\_\_\_\_ Overnight Delivery Services

By: \_\_\_\_\_

  
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