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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.

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

**DEFENDANT WATCH
TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA'S JOINDER
IN DEFENDANT
WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW
YORK, INC.'S RESPONSE
BRIEF IN OPPOSITION TO
PLAINTIFFS' MOTION TO
COMPEL RE: WAIVED
PRIVILEGE**

Cross-Claimants,

-vs-

BRUCE MAPLEY SR.,

Cross-Defendant.

Defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) hereby joins in Defendant Watchtower Bible and Tract Society of New York, Inc.’s (“WTNY”) Response Brief in Opposition to Plaintiffs’ Motion to Compel Re: Waived Privilege filed August 25, 2022 (Doc. 136), in requesting the Court deny Plaintiffs’ Motion to Compel (Doc. 132).

WTPA likewise opposes Plaintiffs’ Motion and fully incorporates as though wholly set forth herein the arguments, cited authorities, supporting facts, and legal analysis set forth in WTNY’s Response Brief (Doc. 136) and its attached Exhibits (Doc. 136-1, 136-2).

DATED this 25th day of August, 2022.

MOULTON BELLINGHAM PC

By /s/ Jordan W. FitzGerald
GERRY P. FAGAN
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of August, 2022, a copy of the foregoing was served on the following persons:

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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