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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.,
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA, and
BRUCE MAPLEY SR.,

Defendants,

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.,
Cross Claimant,

BRUCE MAPLEY, SR.,
Cross Defendant.

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

**AFFIDAVIT OF
RYAN R. SHAFFER**

ARIANE ROWLAND, and JAMIE
SCHULZE

Plaintiff,

vs.

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

Defendants.

Cause No. CV 20-59-BLG-SPW

Pursuant to this Court's Orders (Doc. 135 in CV 20-52-BLG-SPW; Doc 120 in CV-20-59-BLG-SPW-TJC) I, Ryan R. Shaffer, an attorney duly admitted to practice law in this Court, submit the following Affidavit and supporting documents of costs, expenses, and attorney's fees directly resulting from litigation over Defendant Watch Tower Bible and Tract Society of Pennsylvania's Motion to Dismiss ("WTPA's Motion") filed in the above captioned cases:

1. I am a Partner in the law firm of Meyer, Shaffer & Stepan and represent Plaintiffs in this matter.
2. Plaintiffs' counsel has gone to great effort to ensure that costs, expenses, and fees claimed herein are accurate.
3. Costs and expenses were tracked contemporaneously, and where receipts are available, they have been provided. Declaration of Patti Gruwell attached as **Exhibit A**.

4. Attorney and paralegal time expenditures were not kept contemporaneously, but sufficient records and documentation existed to provide a basis for reasonable, and indeed very conservative, expenditures of billable time for each task in the litigation over WTPA's Motion. *See* Declaration of Ryan Shaffer (attached as **Exhibit B**), Declaration of Robert Stepan (attached as **Exhibit C**), Declaration of James Murnion (attached as **Exhibit D**), Declaration of Matthew Merrill (attached as **Exhibit E**), and Declaration of Jessica Yuhas (attached as **Exhibit F**).

5. Plaintiffs' counsel's goal in identifying the time expended on each task in the litigation over WTPA's Motion was to ensure that the attorney's fees claimed are conservative and actually reflect far less time than was required to litigate WTPA's Motion. For instance:

- a. While all of Plaintiffs' attorneys participated to varying degrees on the drafting and editing process of briefs filed with the Court, the only attorney time claimed is for Ryan Shaffer. The only exception to this is the voluminous Brief in Response to WTPA's Motion (Doc. 96 in CV 20-52-BLG-SPW; Doc. 86 in CV-20-59-BLG-SPW-TJC) which required an exceptional amount of attorney James Murnion's time.

- b. Hundreds of hours of meetings, document review, emails, and phone calls were not claimed because there was no obvious and reliable way to reconstruct and claim that time.
 - c. Where time entries were made, they were based on careful review of the actual documents and correspondence involved in the task and then given a conservative time expenditure that is likely far less than the actual time incurred.
6. As set forth in the attached supporting documentation, the total costs, expenses, and fees being claimed as a result of WTPA's Motion are as follows:


Entry	Amount
Shaffer Attorney Fees	\$68,070.00
Stepans Attorney Fees	\$13,800.00
Murnion Attorney Fees	\$56,990.00
Merrill Attorney Fees	\$27,510.00
Yuhas Paralegal Fees	\$9,990.00
Out of Pocket Litigation Costs	\$14,363.11
TOTAL	\$190,723.11

7. Based on my experience litigating civil matters in state and federal courts, \$190,723.11 is a modest amount for litigation spanning seventeen (17) months that involves voluminous documents, multiple discovery

disputes and associated motions and hearings, and significant substantive briefing to the Court.

8. Pursuant to prior Order of this Court, Defendants previously submitted payment of **\$22,631.80** related to discovery motions practice that was a result of WTPA's Motion. (Doc. 93 in CV 20-52-BLG-SPW; Doc. 81 in CV-20-59-BLG-SPW-TJC). This amount was paid by Defendants and should therefore be subtracted from the amount now due.
9. Based upon the foregoing, the total amount of unpaid costs, expenses, and fees related to litigation over WTPA's Motion that are now being claimed by Plaintiffs is **\$168,091.31**.
10. Based upon the foregoing and the documents supporting this Affidavit, I affirm and certify that the amount now being claimed is a very conservative reflection of the actual time and expense expended litigating WTPA's Motion.

DATED this 20 day of September, 2022.

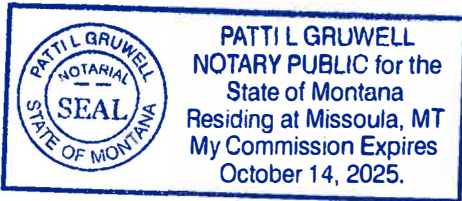
By: 

Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

State of Montana

County of Missoula

This instrument was signed and sworn to before me on September 20th 2022 by
Ryan R. Shaffer.



Patti L. Gruwell
(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