

***Exhibit C***

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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

**DECLARATION OF  
ROBERT L. STEPANS**

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.	)	
	)	

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I, Robert L. Stepan, an attorney duly admitted to practice law in this Court, declares that the foregoing is true and correct:

1. I submit this Declaration in support of Plaintiffs' Financial Affidavit regarding the fees and costs expended litigating Watch Tower Bible and Tract Society of Pennsylvania's ("WTPA") Motion to Dismiss. Motion to Dismiss and Brief in Support (CV 20-52-BLG-SPW Doc. 13 & 14; CV-20-59-BLG-SPW-TJC Doc 9 & 10) (referred to herein as "WTPA's Motion").

2. I am a Partner in the law firm of Meyer, Shaffer & Stepan and represent Plaintiffs in this matter.

3. I am admitted to practice law in the state and Federal courts of Montana, Wyoming, Colorado, and the Federal court of North Dakota. I have been practicing law since 2007.

4. My firm represents victims of sexual abuse and harassment on a contingency fee basis.

5. In circumstances where my firm represents clients on an hourly fee basis, my ordinary and customary rate is \$300/hour.

6. My primary role in this litigation to date has been reviewing documents, participating in strategy meetings and travelling to Billings for oral argument in front of the Court.

7. While I have also reviewed briefs, discovery, and been a part of hundreds of hours of meetings regarding litigation over WTPA's Motion, none of that time was kept contemporaneously and there is no reliable way for me to capture or claim those hours.

8. As a result, I have prepared an itemization of my time spent litigating WTPA's Motion, which is attached as **Exhibit 1**, by reviewing my calendar, the record of teams and teleconference meetings I attended, and a record of the Jehovah's Witness documents assigned to me for review (attached as **Exhibit 2**).

9. I specifically excluded from **Exhibit 1** many meetings, emails, phone calls, and discussions with my co-counsel related to litigating the WTPA's Motion because they were not memorialized or recorded. For example, my Partner Ryan Shaffer, co-counsel and I frequently discussed at length, both verbally and via

email, all manner of issues related to WTPA's Motion. However, I have made no attempt to include such time on **Exhibit 1** because there is no objective guidepost to tether a reasonable estimate to. As a result, my itemization omits hundreds of hours of time that I actually spent litigating WTPA's Motion.

10. For the foregoing reasons, I certify that the time set forth in my billing entries is a conservative reflection of the time I actually expended in litigating WTPA's Motion.

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 20<sup>th</sup> day of September, 2022.

By: /s/ Robert L. Stepan  
Robert L. Stepan  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*

***Exhibit 1***

		<b>ROBERT STEPANS TIME ENTRIES RE: HANDLING WTPA MOTION TO DISMISS ON PERSONAL JURISDICTION</b>				
	<b>Date</b>	<b>Event</b>	<b>Review of Incoming Doc</b>	<b>Teams Meetings / Conf. Calls</b>	<b>Travel Time (50% of hourly billing rate)</b>	<b>Time in Court</b>
1	7/9/2020	Attorney meeting re: Motion to dismiss and joint discovery plan		0.8		
2	~7/13/2020 – ~3/20/2021	Review of Jehovah's Witness documents obtained from Defendants and Third Parties re: WTPA's role in the church and contacts with Montana	8.6			
3	10/8/2020	Attorney meeting re: document and information management; scope of jurisdictional discovery; 1st round of jurisdictional discovery to WTPA		1.1		
4	11/11/2020	Attorney meeting re: protective order; motion to conduct discovery on Mapley/WTNY; 2nd jurisdictional discovery to WTPA and 1st to WTNY		1		
5	12/17/2020	Attorney meeting re: finalizing SDT to Hardin Congregation; additional jurisdictional discovery to WTPA/WTNY; documents/correspondence received from WTPA		2.4		
6	12/22/2020	Attorney meeting with consultant re: WTPA's role in the church		3		
7	1/6/2021	Attorney Meeting re: Hardin Congregation Subpoena and ongoing Jurisdictional Discovery		1.1		
8	1/15/2021	Attorney meetign re: documents received from WTPA, disocvery disputes, serving additional discovery before 1/25 deadline, legal research on personal jurisdiction		0.4		
9	2/11/2021	Attorney Meeting re: Hardin Congregation Subpoena and ongoing Jurisdictional Discovery		1		
10	3/23/2021	Attorney meeting re: discovery disputes		1.1		
11	4/2/2021	Attorney meeting re: discovery disputes		1.1		
12	5/20/2021	Attorney meeting re: motions to compel + upcoming oral arguments		1.1		
13	6/15/2021	Attorney meeting re: motions to compel + upcoming oral arguments		1.3		
14	6/17/2021	Mock hearing re: motion to compel jurisdictional discovery		1.7		

15	6/23/2021	Oral argument re: Motion to compel jurisdictional discovery			11.6	1.3	
16	7/30/2021	Order re: Motion to compel Hardin Congregation subpoena duces tecum	0.5				
17	8/24/2021	Order re: motion to compel jurisdictional discovery	0.5				
18	8/26/2021	Attorney meeting re: documents relevant to personal jurisdiction and forthcoming response to MTD		1.3			
19	8/30/2021	Order re: redaction of subpoena duces tecum documents	0.4				
20	9/2/2021	Attorney meeting to discuss affidavit of fees and costs on Motion to Compel, review of Watchtower financial documents, Brumley depo., SDT to Hardin.		0.4			
21	10/18/2021	Attorney Meeting to discuss personal jurisdiction brief and potential Rule 11 letter		1.2			
22	3/16/2021	Mock hearing re: motion for sanctions		1.8			
23	4/5/2022	Oral argument re: Motion for sanctions			11.6	1.3	
	<b>Time Totals</b>		10	21.8	23.2	2.6	<b>Grand Total \$13,800</b>
	<b>Hourly Rate</b>		\$300	\$300	\$150	\$300	
	<b>Total Fee</b>		\$3,000	\$6,540	\$3,480	\$780	



***Exhibit 2***

<b>PRODUCED BY/ BATES PREFIX</b>	<b>BATES NUMBER</b>	<b>DOCUMENT DATE</b>	<b>DOCUMENT DESCRIPTION</b>	<b>RVW ATTORNEY</b>
CAEKAERT/MAPLEY	000724-000755	9/1979	1979-09 Pay Attention to Yourselves and to All the Flock	ROB
CAEKAERT/MAPLEY	000756-000819	9/1981	1981-09 Pay Attention to Yourselves and to All the Flock	ROB
CAEKAERT/MAPLEY	000820-000965	8/23/2010	2010-08-23 Shepherd The Flock of God	ROB
CAEKAERT/MAPLEY	000966-001239	1/2019	2019-01 Shepherd The Flock of God	ROB
CAEKAERT/MAPLEY	003168	10/16/2001	2001-10-16 WTNV Ltr to Bodies of Elders re Watchtower Electronic Funds Transfer System (WEFTS)	ROB
CAEKAERT/MAPLEY	003169	2/1/2010	2010-01-02 Christian Cong. of JW Ltr. To Body of Elders re Watchtower Electronic Funds Transfer System (WEFTS)	ROB