

Exhibit F

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**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
JESSICA YUHAS**

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.)	
)	

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 the paralegal at Meyer, Shaffer & Stepan.
3. 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").
4. My ordinary and customary rate is \$75/hour.

5. I personally prepared the itemization of my time spent litigating WTPA's Motion to Dismiss which is attached as **Exhibit 1**.

6. Time I have billed in **Exhibit 1** includes:

- a. Proof reading correspondence, pleadings, and discovery prior to filing and service;
- b. Creating exhibits and exhibit cover pages for all pleadings;
- c. Creating a duplicate pleading to file in the companion case;
- d. Providing correspondence and electronic service of discovery to the Defendants;
- e. Ensuring all documents complied with applicable Local Rules;
- f. Filing all documents in ECF; and
- g. Providing the required copies of any documents to Chambers pursuant to Local Rules and court custom.
- h. Providing a digital copy of same to recipients via email and a hard copy via U.S. Mail or FedEx as applicable.

7. In addition to the routine tasks identified above, I spent several days preparing documents and exhibits for the April 23, 2021 Deposition of James Rowland. I have only included three and one half (3.5) hours of billing for this task.

8. I did not keep contemporaneous records of the time I spent on all of the tasks identified above. However, by going back and looking at the length and complexity of each document filed or served, I can reasonably approximate the time it took based on my experience doing this work. For instance, I know a ten (10) page brief, with several exhibits, will take me approximately two (2) hours to prepare for filing, file, and distribute all necessary copies.

9. To ensure that all of my time entries were a conservative reflection of the time I actually spent on each task, I reduced each entry by approximately 50%. Thereby, a task that took two hours was entered as one hour or less.

10. Based on the foregoing, I know with confidence that each entry in my time index is considerably lower than the actual amount of time I spent.

11. In addition, I excluded many tasks from time entries that were extremely time consuming, including hundreds of hours spent downloading, organizing, and identifying the 1,700 documents produced in Discovery, and travelling and assisting at oral argument,

12. For the foregoing reasons, I affirm and certify that the attached itemization of my time expended litigating WTPA's Motion is a very conservative reflection of the actual time and effort that was expended.

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 20th day of September, 2022.

By: 

Jessica Yuhas, Paralegal
MEYER, SHAFFER & STEPANS PLLP

Exhibit 1

		JESSICA YUHAS TIME ENTRIES RE: HANDLING WTPA MOTION TO DISMISS ON PERSONAL JURISDICTION				
	Date	Event	Bates numbering and organizing incoming personal jurisdiction documents for the file	Preparing Documents for filing or mailing (proof reading, checking citations, creating and organizing referenced exhibits, creating duplicate filing for Rowland/Schulze case; converting all documents to .pdf for filing)	Filing pleadings documents with the Court via ECF, providing chamber copies of filed documents over 20 pages per L.R. 1.4(c)(5), facilitating service of Discovery, Notices of Depositions, and Subpoenas, mailing of letters.	Teams Meetings / Conf. Calls
	7/13/2020	Response brief to WTPA's Motion to Dismiss ("MTD") Pursuant to Rule 12(b)(2)		0.6	0.6	
	~7/13/2020 – ~3/20/2021	Organizing and entering documents obtained from Defendants and Third Parties into document management spreadsheet (total of 1,684 documents produced by WTPA, WTNy and Hardin)	20			
	~7/13/2020 – ~3/20/2021	Organizing, bates numbering and entering Plaintiffs' documents into document management spreadsheet (total of 108 documents in the Caekaert/Mapley Case)	30			
	8/5/2020	Motion & Brief in support of Motion to supplement the record re: MTD		0.4	0.4	
	9/23/2020	Joint JD discovery plan		0.6	0.2	
	10/8/2020	Attorney meeting re: document and information management; scope of jurisdictional discovery; 1st round of jurisdictional discovery to WTPA				1.1
	10/14/2020	First jurisdictional discovery to WTPA		0.5	0.5	
	10/19/2020	Brief re: scope of jurisdictional discovery		1.6	1	
	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
	11/17/2020	Second jurisdictional discovery to WTPA		0.5	0.5	
	11/17/2020	First jurisdictional discovery to WTNy		0.5	0.5	
	12/17/2020	Attorney meeting re: finalizing SDT to Hardin Congregation; additional jurisdictional discovery to WTPA/WTNY; documents/correspondence received from WTPA				1.7
	12/17/2020	Subpoena duces tecum to hardin congregation		0.6	2	
	12/22/2020	Letter to Wilson re: elder interviews		0.2	0.1	

	12/22/2020	Attorney meeting with consultant re: WTPA's role in the church				3
	1/5/2021	Letter to Funyak re: Funyak's purported representation of individuals members of the hardin congregation		0.3	0.2	
	1/5/2021	Attorney meeting with consultant re: WTPA's role in the church				2.5
	1/6/2021	Attorney Meeting re: Hardin Congregation Subpoena				1.1
	1/11/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation		0.2	0.1	
	1/15/2021	Attorney meetign re: documents received from WTPA, discovery disputes, serving additional discovery before 1/25 deadline, legal research on personal jurisdiction				0.4
	1/19/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation + scope of representation		0.3	0.2	
	1/19/2021	Letter to Wilson re: WTPA's jurisdictional discovery responses		0.3	0.2	
	1/20/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation + scope of representation		0.2	0.2	
	1/25/2021	Third jurisdictional discovery to WTPA		0.5	0.5	
	1/25/2021	Second jurisdictional discovery to WTNy		0.5	0.5	
	1/26/2021	Letter to Wilson re: WTPA's jurisdictional discovery responses		0.3	0.2	
	1/26/2021	Letter to Wilson re: WTNy's jurisdictional discovery responses		0.3	0.2	
	1/28/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation		0.1	0.2	
	2/3/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation		0.2	0.2	
	2/26/2021	Joint motion to amend jurisdictional discovery scheduling order		0.3	0.2	
	3/10/2021	Letter to Wilson re: WTPA's and WTNy's jurisdictional discovery responses		0.3	0.2	
	3/26/2021	Letter to Wilson re: WTPA's and WTNy's jurisdictional discovery responses		0.3	0.2	
	3/26/2021	Motion for status conference		0.2	0.1	
	3/30/2021	Letter to Funyak re: Subpoena duces tecum to hardin congregation		0.3	0.2	
	4/2/2021	Attorney meeting re: discovery disputes				1.1
	4/8/2021	Letter to Wilson re: WTPA's and WTNy's jurisdictional discovery responses		0.3	0.2	
1	4/9/2021	Notice of written disco and assoc. conferral efforts		0.2	0.2	
2	4/9/2021	Letter to Wilson re: WTPA's and WTNy's jurisdictional discovery responses and jurisdictional depositions		0.4	0.2	

3	4/1/2021 - 4/12/2021	Preparing Documents/Exhibits for James Rowland deposition		3.5		
4	4/12/2021	Letter to James Rowland re: documents for deposition		0.2	0.5	
5	4/19/2021	Letter to James Rowland re: upcoming deposition		0.2	0.2	
6	4/20/2021	Motion & Brief re: Motion to compel jurisdictional discovery		2	0.7	
7	4/21/2021	Motion & Brief to compel Hardin Congregation subpoena duces tecum		1	0.5	
8	4/23/2021	Deposition of James Rowland		0.3	0.2	
9	5/14/2021	Reply brief re: Motion to compel Hardin Congregation subpoena duces tecum		0.2	0.2	
10	5/20/2021	Attorney meeting re: motions to compel + upcoming oral arguments				1.1
11	5/25/2021	Reply brief re: Motion to compel jurisdictional discovery		0.7	1	
12	6/15/2021	Attorney meeting re: motions to compel + upcoming oral arguments				1.3
13	6/17/2021	Mock hearing re: motion to compel jurisdictional discovery				1.7
14	8/3/2021	Letter to Funyak re: subpoena duces tecum documents		0.1	0.2	
15	8/10/2021	Attorney meeting re: documents relevant to personal jurisdiction				2.3
16	8/11/2021	Letter to Funyak re: redaction of subpoena duces tecum documents		0.2	0.2	
17	8/16/2021	Notice of Docs. Refernced by hardin congregation		0.2	0.2	
18	8/26/2021	Attorney meeting re: documents relevant to personal jurisdiction and forthcoming response to MTD				1.3
19	8/27/2021	Letter to Wilson/Taylor re: impropriety of MTD		0.3	0.2	
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.				0.8
21	9/9/2021	Statement of attorney fees and costs re: motion to compel		0.7	1	
22	9/14/2021	Motion for scheduling order re: remainder of jurisdictional phase of case		0.2	0.2	
23	9/21/2021	Stipulation for taking of remote depositions		0.2	0.2	
24	10/18/2021	Attorney meeting to discuss personal jurisdiction brief and potential Rule 11 letter				1.2
25	10/25/2021	Letters to Wilson, Taylor with Rule 11 motion/brief attached		6	1.5	
26	11/5/2021	Notice re: WTPA's withdrawal of MTD		0.3	0.2	
27	11/5/2021	Response brief to WTPA's MTD		6	1.2	

28	12/3/2021	Motion & Brief for sanctions		4	0.7		
29	1/10/2022	Reply brief re: Motion for sanctions		2.6	0.3		
30	3/16/2021	Mock hearing re: motion for sanctions				1.8	
31	4/6/2022	Transcript order form for oral argument re: Motion for sanctions		0.3	0.2		
	Time Totals		50	40.2	19.6	23.4	Grand Total
	Hourly Rate		\$75	\$75	\$75	\$75	
	Total Fee		\$3,750	\$3,015	\$1,470	\$1,755	