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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.)

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

**PLAINTIFFS' BRIEF IN
SUPPORT OF THEIR
MOTION TO SUPPLEMENT
RECORD RE: PLAINTIFF'S
RESPONSE TO DEFENDANT
WTPA'S MOTION TO
DISMISS**

On June 22, 2020, Defendant Watch Tower Bible and Tract Society of Pennsylvania's ("WTPA") filed its Motion to Dismiss Pursuant to Rule 12(b)(2), Fed. R. Civ. P ("Motion"). Doc. 13. Attached to its brief in support of the Motion was the Affidavit of Philip Brumley, Esq. ("Brumley"). Doc. 14, 14-1. On July

13, 2020, Plaintiffs responded to the Motion and submitted several documents that call into question the accuracy and completeness of Brumley's affidavit. Doc. 21, 21-1, 21-2, 21-3, 21-4. On July 27, 2020, WTPA filed its reply and the Second Affidavit of Brumley. Doc. 25, 26.

After WTPA filed its reply, and as recently as August 4, Plaintiffs have come into possession of additional documents that undermine WTPA's position that it merely holds copyrights and conducts international humanitarian aid and support the allegations in Plaintiffs' Amended Complaint. **Exhibit A** is a 1997 letter from WTPA to an Australian Watch Tower entity advising it how to handle child sexual abuse perpetrated by a Jehovah Witness. **Exhibit B** is a 1987 letter from WTPA to "ALL BODIES OF ELDERS" discussing recent "difficulties" elders have experienced with police investigating crimes committed by Jehovah Witnesses. **Exhibit C** is a 1995 letter from WTPA to "ALL BODIES OF ELDERS" that sets forth the procedure for admitting members of local congregations into the church-run Gilead School. **Exhibit D** is a 1995 letter from WTPA to elders in Britain advising how to handle child sexual abuse perpetrated by a Jehovah Witness. **Exhibit E** is a sworn court document in which WTPA's counsel, in seeking to obtain money for WTPA from the Holocaust education and remembrance settlement fund, stated that WTPA is "the corporate agency directing the administrative and religious work of Jehovah's Witnesses worldwide."

Plaintiffs respectfully request the Court consider the attached materials when deciding WTPA's Motion.

DATED this 5th day of August, 2020.

MEYER, SHAFFER & STEPANS, PLLP

/s/ Ryan Shaffer

By: Ryan R. Shaffer

Attorneys for Plaintiff

CERTIFICATE OF COMPLIANCE WITH L.R. 7.1

Plaintiff certifies that this Brief in Response has 301 words and is in compliance with L.R. 7.1(d)(2).

MEYER, SHAFFER & STEPANS, PLLP

/s/ Ryan Shaffer

By: Ryan R. Shaffer

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of August, 2020, a true and accurate copy of the foregoing was served on the following via email and U.S. Mail:

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