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*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,  
and 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. )

Cause No. CV 20-52-BLG-SPW

**DEFENDANTS WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC.'S AND WATCH  
TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA'S  
UNOPPOSED MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

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COMES NOW Defendants Watchtower Bible and Tract Society of New  
York, Inc., and Watch Tower Bible and Tract Society of Pennsylvania, by and  
through their attorneys of record, and move to admit the appearance of Joel M.  
Taylor as their attorney *pro hac vice* in the above entitled matter pursuant to L.R.  
83.1(d). This motion is based on the Declaration of Joel M. Taylor in Support Of

Application To Appear *Pro Hac Vice*, which is attached as Exhibit 1 and submitted pursuant to 28 U.S.C. § 1746. As required by L.R. 83.1(d)(6), the undersigned will function as local counsel. Opposing counsel has been contacted regarding this motion pursuant to L.R. 7.1(c)(1), and this motion is unopposed. A proposed Order is attached as Exhibit 2 for the Court's consideration and convenience.

DATED this 15<sup>th</sup> day of September, 2020.

By: /s/ Guy W. Rogers  
Guy W. Rogers / Jon A. Wilson  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendants Watchtower  
Bible and Tract Society of New York,  
Inc., and Watch Tower Bible and  
Tract Society of Pennsylvania*

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 15, 2020, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepans  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802
3. Bruce G. Mapley Sr.  
3905 Caylan Cove  
Birmingham, AL 35215

by the following means:

<u>1, 2</u> CM/ECF	<u>        </u> Fax
<u>        </u> Hand Delivery	<u>        </u> E-Mail
<u>3</u> U.S. Mail	<u>        </u> Overnight Delivery Services

By: /s/ Guy W. Rogers  
Guy W. Rogers / Jon A. Wilson  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendants Watchtower  
Bible and Tract Society of New York,  
Inc., and Watch Tower Bible and  
Tract Society of Pennsylvania*