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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

**UNOPPOSED MOTION FOR
ENTRY OF STIPULATED
PROTECTIVE ORDER**

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

VS.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

COMES NOW Defendants/Cross-Claimants Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), and Watch Tower Bible and Tract Society of Pennsylvania, Inc. (hereinafter “WTPA”), by and through their counsel, and, with the agreement of counsel for Plaintiffs Tracy Caekaert and Camillia Mapley, hereby move the Court to enter the Stipulated Protective Order attached as Exhibit 1 pertaining to certain documents to be produced in relation to the Court-ordered jurisdictional discovery. Counsel for WTNY and WTPA has contacted Defendant/Cross-Claim Defendant Bruce Mapley Sr. regarding this Motion, and he has not indicated any objection. A proposed Order is attached as Exhibit 2 for the Court’s consideration and convenience.

DATED this 4th day of March, 2021.

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 March 4, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan
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
4. spw_propord@mtd.uscourts.gov

by the following means:

<u>1, 2</u> CM/ECF	<u> </u> Fax
<u> </u> Hand Delivery	<u> 4 </u> E-Mail
<u> 3 </u> U.S. Mail	<u> </u> Overnight Delivery Services

By: /s/ Guy W. Rogers
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Inc., and Watch Tower Bible and
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