

Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
Meyer, Shaffer & Stepan, PLLP  
430 Ryman Street  
Missoula, MT 59802  
Tel: (406) 543-6929  
Fax: (406) 721-1799  
rob@mss-lawfirm.com  
ryan@mss-lawfirm.com  
james@mss-lawfirm.com

*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

**PLAINTIFFS' MOTION TO  
COMPEL JURISDICTIONAL  
DISCOVERY RESPONSES  
AND FOR COSTS AND FEES**

COMES NOW, Plaintiffs, by and through undersigned counsel, and respectfully moves the Court for an order compelling Defendants Watchtower Bible and Tract Society of New York, Inc. and Watch Tower Bible and Tract Society of Pennsylvania to fully comply with their discovery obligations, as more fully set forth in Plaintiffs' accompanying Brief in Support.

Pursuant to L.R. 26.3(c)(2)(C)(i), (ii), the full text of all at-issue discovery requests and the corresponding responses are attached as exhibits to Plaintiffs' Brief in Support which is being filed contemporaneously with this motion.

Pursuant to Fed. R. Civ. P. 37(a)(1) and L.R. 26.3(c)(1), the undersigned hereby certifies that parties have in good faith conferred regarding the discovery issues raised in this Motion, including direct dialogue.

Plaintiffs further request the Court order the above-named Defendants to pay Plaintiffs' expenses, including attorney's fees, incurred in making this motion. Fed. R. Civ. P. 37(a)(5)(A). The above-named Defendants oppose this Motion.

DATED this 20<sup>th</sup> day of April, 2021.

By: /s/ Ryan Shaffer  
Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*