

***Exhibit J***

Guy W. Rogers  
Jon A. Wilson  
Aaron M. Dunn  
BROWN LAW FIRM, P.C.  
315 North 24<sup>th</sup> Street  
P.O. Drawer 849  
Billings, MT 59103-0849  
Tel. (406) 248-2611  
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)  
MILLER MCNAMARA & TAYLOR LLP  
100 South Bedford Road, Suite 340  
Mount Kisco, New York 10549  
Tel./E-Fax (845) 288-0844  
*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

**DEFENDANT WATCH TOWER  
BIBLE AND TRACT SOCIETY OF  
PENNSYLVANIA'S RESPONSES  
TO PLAINTIFFS' FIRST SET OF  
JURISDICTIONAL DISCOVERY**

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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ARIANE ROWLAND, and JAMIE  
SCHULZE,

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 20-59-BLG-SPW

**DEFENDANT WATCH TOWER  
BIBLE AND TRACT SOCIETY OF  
PENNSYLVANIA'S RESPONSES  
TO PLAINTIFFS' FIRST SET OF  
JURISDICTIONAL DISCOVERY**

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TO: Plaintiffs and their counsel, Robert L. Stepans, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of  
Pennsylvania (hereinafter "WTPA"), by and through its attorneys, and responds to  
Plaintiffs' First Set of Jurisdictional Discovery as follows:

**RESPONSE:** Deny. WTNY has no corporate parent and is not a “legal” subsidiary of any other entity. In a religious sense it is secondary or supplemental to WTPA in that it provides publishing services to WTPA.

**REQUEST FOR ADMISSION NO. 4:** Please admit that in 1977 WTPA notified persons endeavoring to donate to the Jehovah’s Witness church to make their contributions payable to WTPA.

**RESPONSE:** Admit in part and deny in part. WTPA admits that it accepts voluntary donations in support of its religious activities but denies that it “notified” persons to donate to it in 1977.

**REQUEST FOR ADMISSION NO. 5:** Please admit the authenticity of documents produced by as Bates 002082-002256.

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 6:** Please admit that in 2003 WTPA notified persons endeavoring to donate to the Jehovah’s Witness church to make their contributions payable to WTPA.

**RESPONSE:** Admit in part and deny in part. WTPA admits that it accepts voluntary donations in support of its religious activities but denies that it “notified” persons to donate to it in 2003.

**REQUEST FOR ADMISSION NO. 7:** Please admit that for the period 1977 through 2003 WTPA notified persons endeavoring to donate to the Jehovah's Witness church to make their contributions payable to WTPA.

**RESPONSE:** *See Responses to Request for Admission Nos. 4 and 6.*

**REQUEST FOR ADMISSION NO. 8:** Please admit the authenticity of documents produced by Plaintiffs as Bates 000484-000623.

**RESPONSE:** WTPA has made reasonable inquiry, and the information it knows or can readily obtain is insufficient to enable it to admit or deny, as the copy submitted contains underlining, checks, brackets, and other marks apparently made by the possessor of the publication.

**REQUEST FOR ADMISSION NO. 9:** Please admit that you distributed documents produced by Plaintiffs as Bates 00484-000623 to the elders of Jehovah's Witnesses' congregations.

**RESPONSE:** Deny. WTPA did not distribute publications during that timeframe. As a copyright holder and occasional publisher, WTPA made publications available to elders.


**REQUEST FOR ADMISSION NO. 10:** Please admit that you distributed documents produced by Plaintiffs as Bates 000484-000623 to the elders of Jehovah's Witnesses' congregations in Montana.

DATED this 20<sup>th</sup> day of November, 2020.

By: Jon A. Wilson  
Guy W. Rogers / Jon A. Wilson /  
Aaron M. Dunn  
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*

**VERIFICATION**

Philip Brumley states that he has read the foregoing (*Defendant WTPA's Responses to Plaintiffs' First Set of Jurisdictional Discovery*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.

  
Philip Brumley

Dated: November 16, 2020