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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)	Cause No. CV 20-52-BLG-SPW
MAPLEY,)	
)	
Plaintiffs,)	DEFENDANTS WATCH TOWER
)	BIBLE AND TRACT SOCIETY OF
)	PENNSYLVANIA'S AND
vs.)	WATCHTOWER BIBLE AND
)	TRACT SOCIETY OF NEW YORK,
WATCHTOWER BIBLE AND)	INC.'S UNOPPOSED MOTION
TRACT SOCIETY OF NEW YORK,)	FOR EXTENSION OF TIME TO
INC., WATCH TOWER BIBLE AND)	FILE RESPONSE BRIEFS
TRACT SOCIETY OF)	
PENNSYLVANIA, and BRUCE)	
MAPLEY SR.,)	
)	
Defendants.)	
)	
)	
)	
)	
)	

decides to respond, both respectfully request a one-week extension such that any response will be due on or before May 12, 2021.

Good cause exists for the requested extensions of time to file response briefs described above considering a deposition took place last Friday, April 23, 2021, WTPA has been in the process of supplementing jurisdictional discovery¹, and counsel for WTPA and WTNY have scheduling conflicts in the coming week which render the existing due dates of May 4 and May 5, respectively, unworkable.

Both Plaintiffs' counsel and Defendant/Cross-Claim Defendant Bruce Mapley Sr. have been contacted regarding this Motion, and this Motion is unopposed.

Pursuant to L.R. 7.1(c)(3), a proposed Order is attached to this Motion in PDF format and also e-mailed to the Judge in Word format.

DATED this 29th day of April, 2021.

By: /s/ Jon A. Wilson

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*

¹ WTPA served supplemental jurisdictional discovery on both April 19, 2021 and April 28, 2021.

CERTIFICATE OF SERVICE

I hereby certify that, on April 29, 2021, 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

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/ Jon A. Wilson
Jon A. Wilson
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