Kevin M. Funyak STACEY & FUNYAK The Grand Building, Suite 700 100 North 27th Street P.O. Box 1139 Billings, MT 59103-1139 Phone: (406) 259-4545

Fax: (406) 259-4540 kfunyak@staceyfunyak.com

Attorneys for Non-Party Hardin Congregation

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BILLINGS DIVISION

TRACY CAERKAERT and) Cause No. CV 20-52-BLG-SPW
CAMILLIA MAPLEY,)
CHANGELIA WITH ELT,)
Plaintiffs,) MOTION FOR ORAL
r rammins,) ARGUMENT ON PLAINTIFFS'
	,
VS.) MOTION TO COMPEL RE:
WATCHTOWER BIBLE AND) HARDIN CONGREGATION'S
TRACT SOCIETY OF NEW YORK,) SUBPOENA
INC. and WATCHTOWER BIBLE)
AND TRACT SOCIETY OF)
PENNSYLVANIA,	
Defendants.)
)
WATCHTOWER BIBLE AND)
TRACT SOCIETY OF NEW YORK,)
,)
Cross Claimant,)
VS.)
BRUCE MAPLEY, SR.,)
DICCOL IIII II LL I, DIC.,	J
)
Cross Defendant.)

Case 1:20-cv-00052-SPW Document 70 Filed 05/14/21 Page 2 of 3

Plaintiffs have filed their Reply Brief In Support Of Motion To Compel Re:

The Hardin Congregations Subpoena. As such, all briefing on plaintiffs' pending

motion has been submitted.

With the foregoing in mind and pursuant to Rule 6(c)(1), F.R.Civ.P. and Local

Rule 7.1(e), the Hardin Congregation moves the Court to set a date and time for oral

arguments on plaintiffs' motion. The Hardin Congregation respectfully requests the

opportunity to be heard on the record by the Court as the issues raised by plaintiffs'

motion have significant implications to its ability to comply with church doctrines,

canons and established practices of the Jehovah's Witnesses faith in maintaining the

type of communications at issue as strictly confidential.

RESPECTFULLY SUBMITTED this 14th day of May, 2021.

STACEY & FUNYAK

By: /s/ Kevin M. Funyak

Kevin M. Funyak

Attorneys for Non-Party Hardin

Congregation

Page 2 of 3

CERTIFICATE OF SERVICE

I hereby certify that on the 14 th day of May, 2021, a true and correct cop	y of
the foregoing was served upon the following person(s) by the following means:	

- 1,2 CM/ECF
 Hand Delivery
 3,4 U.S. Mail
 Facsimile
 Benail
 Overnight Delivery Services
- Ryan R. Shafer
 MEYER, SHAFFER & STEPANS, PLLP
 430 Ryman Street
 Missoula, Montana 59802
 ryan@mss-lawfirm.com
- 2. Guy W. Rogers
 Jon A. Wilson
 BROWN LAW FIRM, P.C.
 P.O. Drawer 849
 Billings, MT 59103
 grogers@brownfirm.com
 jwilson@brownfirm.com
- 3. Joel M. Taylor
 Miller McNamara & Taylor LLP
 100 South Bedford Road, Suite 340
 Mount Kisco, NY 10549
 jtaylor@mmt-law.com
- 4. Bruce G. Mapley, Sr. 3905 Caylan Cove Birmingham, AL 35215

STACEY & FUNYAK

By:	/s/Kevin M. Funyak
-	•