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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 Cause No. CV 20-52-BLG-SPW 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.

DEFENDANTS WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA'S AND WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, **INC.'S REQUEST FOR ORAL ARGUMENT ON PLAINTIFFS' MOTION TO COMPEL** JURISDICTIONAL DISCOVERY **RESPONSES AND FOR COSTS AND FEES (DOC. 56)**

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.		
Cross-Claimant,		
vs.		
BRUCE MAPLEY SR.,		
Cross-Claim Defendant.		

Defendants Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA") and Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), by and through their attorneys, hereby respectfully request this Court to set a date and time for oral argument on Plaintiffs' Motion to Compel Jurisdictional Discovery Responses And For Costs And Fees (Doc. 56).

On April 20, 2021, Plaintiffs filed their Motion to Compel Jurisdictional Discovery Responses And For Costs And Fees (hereinafter "Pl.'s MTC Jurisdictional Discovery") along with a supporting Brief. *See* Docs. 56-57. On May 11, 2021, WTPA and WTNY filed their joint Response Brief in Opposition to Pl.'s MTC Jurisdictional Discovery. *See* Doc. 67. Plaintiffs filed their Reply Brief on May 25, 2021. *See* Doc. 72. As such, briefing on Pl.'s MTC Jurisdictional Discovery is complete.

In light of the foregoing procedural background and pursuant to Rule 6(c)(1), Fed.R.Civ.P. and L.R. 7.1(e), WTPA and WTNY respectfully request this Court set a date and time for oral argument on Pl.'s MTC Jurisdictional Discovery. Given the issues Plaintiffs have raised in their briefing and the impact any ruling from this Court will have on remaining jurisdictional discovery, WTPA and WTNY respectfully request the opportunity to be heard on the record. WTPA and WTNY believe hearing argument from counsel will be beneficial to this Court's analysis of Pl.'s MTC Jurisdictional Discovery.

DATED this 26th day of May, 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

CERTIFICATE OF SERVICE

I hereby certify that, on May 26, 2021, a copy of the foregoing was served on the following person(s):

- 1. U.S. District Court, Billings Division
- Robert L. Stepans
 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:

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