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*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' UNOPPOSED  
MOTION FOR SCHEDULING  
ORDER RE: REMAINDER OF  
JURISDICTIONAL PHASE OF  
CASE**

Plaintiffs, by and through their undersigned counsel, hereby moves the Court for entry of a scheduling order for the remainder of the jurisdictional phase of this case. Plaintiffs and Defendants Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) and Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) conferred and agreed on the following deadlines:

- WTPA and WTNY comply with their discovery obligations as set forth in the Court’s August 24, 2021, Order re Motion to Compel Jurisdictional Discovery and For Costs and Fees (Doc. 85) by **September 21, 2021**.
- Depositions, if any, to be completed by **October 26, 2021**.
- Contingent upon compliance with the above, the Parties will be prepared to commence final briefing on WTPA’s Motion to Dismiss beginning **November 9, 2021**.<sup>1</sup>

Plaintiffs proposed the above schedule to Defendants WTPA and WTNY, who had no objection. A proposed Order is filed herewith and emailed to the Court pursuant to L.R. 7.1(c)(3).

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<sup>1</sup> Without knowing exactly what briefing schedule the Court would prefer, the Parties wanted to express that, so long as the preceding dates are complied with, they will collectively be ready to begin the briefing process as early as November 9, 2021.

DATED this 14<sup>th</sup> day of September, 2021.

By: /s/ Ryan Shaffer

Robert L. Stepan

Ryan R. Shaffer

James C. Murnion

MEYER, SHAFFER & STEPANS PLLP

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.