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Attorneys for Plaintiffs

**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' MOTION TO
COMPEL DEPOSITIONS**

Plaintiffs, by and through undersigned counsel, respectfully move the Court for an order compelling:

1. The deposition of three Jehovah's Witness elders in New York who have worked at the Jehovah's Witness Organization's headquarters during all times relevant to Plaintiffs' claims and who have substantial knowledge and information relevant to Plaintiffs' case; and
2. A staggered deposition of WTNY whereby the first stage is to obtain testimony regarding WTNY's sweeping claims of testimonial privilege, and the second stage is to obtain information bearing the substance of Plaintiffs' claims after the scope of those privileges has been resolved.

Defendants have been contacted and oppose this Motion and a brief in support is being filed contemporaneously herewith.

DATED 6th day of October, 2022.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer
Ryan R. Shaffer
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.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
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