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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

**REPLY BRIEF IN SUPPORT
OF PLAINTIFFS' MOTION
FOR NEW SCHEDULING
ORDER**

Plaintiffs submit the following Reply in Support of their Motion for a New Scheduling Order (ECF Doc. 148, 149).

It appears Plaintiffs and Defendants WTNy and WTPA agree that a new scheduling order is appropriate. ECF Doc. 151, 152.¹ However, since Plaintiffs filed their Motion, new discovery disputes have emerged. *See* ECF Doc. 153, 154. WTNy's unwillingness to set depositions intended to shed light on its sweeping claims of testimonial privilege stand to further delay timely prosecution of this case, including Plaintiffs' ability to thoroughly assess and brief challenges to WTNy's privilege log. *Id.* As a result, Plaintiffs' belief that they will be prepared to brief motions to compel evidence by December 1, 2022, is no longer realistic.

Given the additional motions practice now required to set depositions intended to understand WTNy's sweeping claims of testimonial privilege, Plaintiffs do not know when they will be prepared to fully brief challenges to WTNy's privilege log. Nevertheless, Plaintiffs are still requesting a new scheduling order that permits sufficient time to complete discovery after questions about the scope of WTNy's claims of testimonial privilege, and the availability of evidence regarding the sexual abuse at issue in this case, are resolved.

DATED this 7th day of October, 2022.

¹ Defendant Bruce Mapley Sr. has not stated a position one way or the other on Plaintiffs' Motion for a New Scheduling Order.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer

Ryan R. Shaffer

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Attorneys for Plaintiffs

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(d)(2), Plaintiff hereby certifies that this brief complies with the length requirement for briefs, and that this brief contains 226 words, excluding the caption, certificates of service and compliance, table of contents and authorities, and exhibit index.

By: /s/ Ryan Shaffer
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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
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