



WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

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STATE OF MONTANA )

: ss.

County of Yellowstone )

I, Jon A. Wilson, being duly sworn, depose and state as follows:

1. I am an attorney admitted to practice in the State of Montana. I am a shareholder with Brown Law Firm, P.C.

2. I am co-counsel for Defendant/Cross-Claimant Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), in the above-entitled matter, have personal knowledge of the facts set forth herein, and am otherwise competent to testify.

3. The purpose of this Affidavit is to provide the foundation for and verification of the accuracy of the documents attached hereto in support of WTNY's Response Brief in Opposition to Plaintiffs' Motion to Compel Depositions.

4. Attached as Exhibit 1 is a true and correct copy of WTNY's initial privilege log served on March 25, 2022.

5. Attached as Exhibit 2 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel dated April 13, 2022.

6. Attached as Exhibit 3 is a true and correct copy of a letter from WTNY's counsel to Plaintiffs' counsel dated May 2, 2022, as well as a true and correct copy of the enclosed WTNY's first supplemental privilege log.

7. Attached as Exhibit 4 is a true and correct copy of an e-mail from Plaintiffs' counsel to WTNY's counsel, counsel for Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"), and Cross-Claim Defendant Bruce Mapley Sr. (hereinafter "Mr. Mapley") dated June 29, 2022, as well as a true and correct copy of the draft Notice attached thereto.

8. Attached as Exhibit 5 is a true and correct copy of an e-mail from WTNY's counsel to Plaintiffs' counsel with copies to WTPA's counsel and Mr. Mapley dated July 14, 2022.

9. Attached as Exhibit 6 is a true and correct copy of a letter from WTNY's counsel to Plaintiffs' counsel dated August 15, 2022, which followed a telephone call between Plaintiffs' counsel and WTNY's counsel on August 2, 2022.

10. Attached as Exhibit 7 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel dated August 18, 2022.

11. Attached as Exhibit 8 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel dated August 30, 2022, as well as a true and correct copy of the enclosed Notice.

12. Attached as Exhibit 9 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel dated September 9, 2022.

13. Attached as Exhibit 10 is a true and correct copy of an e-mail from Plaintiffs' counsel to WTNY's counsel and WTPA's counsel dated September 12, 2022.

14. Attached as Exhibit 11 is a true and correct copy of a letter from WTNY's counsel to Plaintiffs' counsel with copy to WTPA's counsel dated September 15, 2022. The issues raised therein were discussed during a telephone call between Plaintiffs' counsel and WTNY's counsel on September 19, 2022.

15. Attached as Exhibit 12 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel dated September 23, 2022.

16. Attached as Exhibit 13 is a true and correct copy of a letter from WTNY's counsel to Plaintiffs' counsel dated September 26, 2022, as well as a true and correct copy of the enclosed WTNY's second supplemental privilege log.

17. Attached as Exhibit 14 is a true and correct copy of an e-mail from Plaintiffs' counsel to WTNY's counsel and WTPA's counsel dated September 27, 2022.

18. Attached as Exhibit 15 is a true and correct copy of an e-mail from WTPA's counsel to Plaintiffs' counsel with copy to WTNY's counsel dated September 28, 2022.

19. Attached as Exhibit 16 is a true and correct copy of an e-mail from Plaintiffs' counsel to WTPA's counsel with copy to WTNY's counsel dated September 28, 2022.

20. Attached as Exhibit 17 is a true and correct copy of a letter from Plaintiffs' counsel to WTNY's counsel and WTPA's counsel dated September 29, 2022. While the letter is dated September 29, 2022, WTNY's counsel did not receive it until October 4, 2022, through the U.S. Mail.

21. Attached as Exhibit 18 is a true and correct copy of an e-mail from WTNY's counsel to Plaintiffs' counsel with copy to WTPA's counsel dated October 5, 2022.

22. Attached as Exhibit 19 is a true and correct copy of an e-mail from Plaintiffs' counsel to WTNY's counsel with copy to WTPA's counsel dated October 5, 2022.

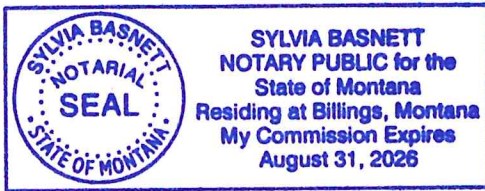
Further this Affiant sayeth naught.

DATED this 20<sup>th</sup> day of October, 2022.



Jon A. Wilson

SUBSCRIBED and SWORN to before me by Jon A. Wilson on this 20<sup>th</sup> day  
of October, 2022.



By:   
Notary Public for the State of Montana

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 20, 2022, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepans/Ryan R. Shaffer/James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802
3. Matthew L. Merrill (appearing *pro hac vice*)  
MERRILL LAW, LLC  
1863 Wazee Street, Suite 3A  
Denver, CO 80202
4. Gerry P. Fagan/Christopher T. Sweeney/Jordan W. FitzGerald  
MOULTON BELLINGHAM PC  
P.O. Box 2559  
Billings, MT 59103-2559
5. Bruce G. Mapley Sr.  
3905 Caylan Cove  
Birmingham, AL 35215

by the following means:

<u>1-4</u> CM/ECF	<u>        </u> Fax
<u>        </u> Hand Delivery	<u>        </u> E-Mail
<u>5</u> U.S. Mail	<u>        </u> Overnight Delivery Services

By: /s/ Jon A. Wilson  
Jon A. Wilson  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendant Watchtower  
Bible and Tract Society of New York,  
Inc.*