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Pennsylvania*

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., and
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,

Case No. CV-20-00052-SPW-TJC

**DEFENDANT WATCH
TOWER BIBLE AND TRACT
SOCIETY OF
PENNSYLVANIA'S
NOTICE OF ERRATA RE:
BRIEF IN RESPONSE TO
PLAINTIFFS' AFFIDAVIT
OF RYAN SHAFFER**

Cross-Claimants,

-vs-

BRUCE MAPLEY SR.,

Cross-Defendant.

Defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) respectfully submits this Notice of Errata to correct and clarify two issues regarding WTPA’s Brief in Response to Plaintiffs’ Affidavit of Ryan Shaffer (Doc. 165) (“WTPA’s Response”).

1. WTPA’s Response incorrectly states that Plaintiffs never filed a response brief to WTPA’s Motion to Dismiss (Doc. 13) for lack of personal jurisdiction. (*See* Doc. 165 at 9, 23.) WTPA provides notice that it corrects that statement. Plaintiffs did file such a response brief on November 5, 2021¹ (Doc. 96) (although it was filed after WTPA had already withdrawn its Motion to Dismiss on November 5, 2021 (*see* Doc. 94)). Plaintiffs also filed a Notice Re: WTPA’s Withdrawal of its Rule 12(b)(2) Motion to Dismiss on November 5, 2021 (Doc. 95), which stated their intention to proceed with filing a response brief. (*See* Doc. 95 at 4, ¶ 11.)

¹ The deadline for Plaintiffs to file their response was November 9, 2021. (*See* Doc. 90 at 2.)

2. WTPA's Response states that Messrs. Shaffer and Murnion billed for 28 and 33 hours respectively in one 24-hour day on November 5, 2021. (*See* Doc. 165 at 9, 23.) While that statement correctly states the amount of hours specified for November 5, 2021, in the Declarations of Messrs. Shaffer and Murnion (*see* Doc. 144-2 at 13; Doc. 144-4 at 13), Plaintiffs' counsel has since informed the undersigned that the asserted time for November 5, 2021, actually occurred over a period of unspecified time, rather than only on November 5, 2021.

DATED this 28th day of October, 2022.

MOULTON BELLINGHAM PC

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CERTIFICATE OF SERVICE

I hereby certify that on 28th day of October, 2022, a copy of the foregoing was served on the following persons:

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By the following means:

<u>1, 2, 3</u> CM/ECF	<u> </u> Fax
<u> </u> Hand Delivery	<u> </u> E-Mail
<u>4</u> U.S. Mail	<u> </u> Overnight Delivery Services

By /s/ Gerry P. Fagan
GERRY P. FAGAN