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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' NOTICE RE:  
ADDITIONAL MOTIONS TO  
COMPEL**

In light of the Court's October 26, 2022, Order holding Plaintiffs' Motion for a New Scheduling Order in Abeyance (Doc. 168), and to the extent that the Court's decision on the future scheduling of this case is dependent upon resolution of Plaintiffs' motions to compel, Plaintiffs want the Court to have NOTICE that additional motions to compel evidence being withheld by WTNY are forthcoming, including motions to compel other documents identified in WTNY's privilege log.<sup>1</sup>

DATED this 3<sup>rd</sup> day of November, 2022.

By: /s/ Ryan Shaffer  
Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*

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<sup>1</sup> While the parties are in the process of conferring over WTNY's privilege log entries, it is clear that significant and material disagreements over the claimed privileges will need to be resolved by the Court.

**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  
MEYER, SHAFFER & STEPANS PLLP

*Attorneys for Plaintiffs*