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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' UNOPPOSED
MOTION TO EXTEND
EXPERT WITNESS
DISCLOSURE AND
DISCOVERY DEADLINES**

Plaintiffs, by and through their counsel of record, move the Court to extend the expert witness disclosure and discovery deadlines as follows:

- Extend the Plaintiffs' expert witness disclosure deadline from November 15, 2022 to **February 15, 2023**;
- Extend Defendants' expert witness disclosure deadline from December 12, 2022 to **March 15, 2023**; and
- Extend the Discovery deadline to **March 31, 2023**.

Trial is set to begin on September 18, 2023, with the Final Pretrial Conference set for September 5, 2023. Plaintiffs do not believe that modification of the expert disclosures contemplated by this Motion will impact the current trial setting.

BASIS FOR MOTION AND DEFENDANTS' POSITION

1. Plaintiffs' Motion for a New Scheduling Order, that would permit continued discovery after the Court resolves disputes over WTNY's privilege log is unopposed and currently pending. *See* Doc. 148, 149, 151, 152, and 168.
2. In the meantime, Plaintiffs' expert disclosure deadline is set to expire on November 15, 2022. Doc. 129.
3. Regardless of how the Court eventually rules on Plaintiffs' pending Motion for a New Scheduling Order, Plaintiffs are seeking additional time to complete more discovery before disclosing expert witnesses.
4. Defendants stated that they do not oppose Plaintiffs' Motion to Extend the

Expert Disclosure Deadlines, so long as the discovery deadline was extended to March 31, 2023.

Based on the foregoing, Plaintiffs now come to the Court seeking an Order extending the expert disclosure and discovery deadlines as set forth above.

DATED this 3rd day of November, 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
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