

EXHIBIT A

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

COMES NOW Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and submits this Amendment to its Answer to First Amended Complaint, Cross-Claim, and Demand for Jury Trial dated July 27, 2020 (Doc. 27) (hereinafter “WTNY’s Answer”). This Amendment supplements and incorporates WTNY’s Answer as if fully set forth herein. As such, while the entire contents of WTNY’s Answer are not set forth below, WTNY maintains its Answer to the allegations in the First Amended Complaint as set forth in WTNY’s Answer, its affirmative defenses as set forth in WTNY’s Answer, its Cross-Claim against Bruce Mapley Sr. as set forth in WTNY’s Answer, and its Demand for Jury Trial as set forth in WTNY’s Answer. This Amendment adds the following affirmative defense to WTNY’s Answer:

TWENTY-FIFTH AFFIRMATIVE DEFENSE

By Plaintiffs’ Notice of Dismissal re: All Claims Against Defendant Bruce Mapley Sr. dated November 16, 2022 (Doc. 175), Plaintiffs gave notice of

dismissing their claims against Bruce Mapley Sr. pursuant to Rule 41(a)(1)(A)(i), Fed.R.Civ.P. By Order Dismissing All Claims Against Defendant Bruce Mapley Sr. dated November 16, 2022 (Doc. 176), the Court dismissed all of Plaintiffs' claims against Bruce Mapley Sr. The basis for the dismissal of Plaintiffs' claims against Bruce Mapley Sr. is unknown, as Plaintiff Camillia Mapley was instructed by counsel during her deposition on November 29, 2022, not to answer questions regarding whether Plaintiffs had settled their claims against Bruce Mapley Sr. or released him from liability for their claims.

To the extent Plaintiffs have either settled their claims against Bruce Mapley Sr. or released him from liability pursuant to Mont. Code Ann. § 27-1-703(6)(a), WTNY asserts that Plaintiffs' damages were caused in full or in part by Bruce Mapley, Sr. WTNY hereby provides notice pursuant to Mont. Code Ann. § 27-1-703(6)(f) to all parties in this matter that WTNY is asserting as an affirmative defense that Bruce Mapley Sr. is at fault and that his negligence and wrongdoing caused, in whole or in part, Plaintiffs' alleged injuries and damages.

A copy of this Amendment will be mailed to Bruce Mapley Sr. via certified mail, return receipt requested, as follows:

Bruce Mapley, Sr.
3095 Caylan Cove
Birmingham, AL 35215

DATED this XX day of December, 2022.

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.*

CERTIFICATE OF SERVICE

I hereby certify that, on December **XX**, 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	_____	Fax
_____	Hand Delivery	_____	E-Mail
_____	U.S. Mail	_____	Overnight Delivery Services
<u>5</u>	Certified Mail		

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.*