

Jon A. Wilson  
Brett C. Jensen  
BROWN LAW FIRM, P.C.  
315 North 24<sup>th</sup> Street  
P.O. Drawer 849  
Billings, MT 59103-0849  
Tel. (406) 248-2611  
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)  
MILLER MCNAMARA & TAYLOR LLP  
100 South Bedford Road, Suite 340  
Mount Kisco, New York 10549  
Tel./E-Fax (845) 288-0844  
*Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.*

**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.

Cause No. CV 20-52-BLG-SPW

**DEFENDANT WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF IN SUPPORT OF ITS MOTION TO AMEND ANSWER TO ASSERT SETTLED PARTY DEFENSE**

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 counsel of record, and respectfully moves the Court for an extension of time up to and including Wednesday, December 28, 2022, to file a reply brief in support of its Motion to Amend Answer to Assert Settled Party Defense (Doc. 177). Counsel for WTNY have contacted Plaintiffs’ counsel, and there is no objection to this requested extension of time. A proposed Order is submitted herewith.

DATED this 20<sup>th</sup> 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 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>        </u> U.S. Mail	<u>        </u> Overnight Delivery Services
<u>5</u> Certified Mail, Return Receipt Requested	

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.*