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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

AND

Cause No. CV 20-59-BLG-SPW

**PLAINTIFFS' MOTION TO
COMPEL PRODUCTION OF
NON-PRIVILEGED
INFORMATION IN
DOCUMENTS WITHHELD BY
WTNY ON THE BASIS OF
CLERGY-PENITENT
PRIVILEGE**

ARIANE ROWLAND, and JAMIE)
SCHULZE,)
)
Plaintiffs,)
)
vs.)
)
WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC.,)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA,)
)
Defendants.)
)

Plaintiffs in the above referenced cases, by and through undersigned counsel, respectfully move the Court for an order compelling Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) to produce all non-privileged information contained in documents being withheld from production on the basis of the clergy-penitent privilege. Alternatively, if the Court is not convinced production of the withheld documents is in order, Plaintiffs request *in camera* review. A brief setting forth the reasons and basis for this Motion is filed contemporaneously herewith, including an exhibit setting forth the discovery being sought and WTNY’s responses.

Pursuant to L.R. 26.3 (c), Plaintiffs’ counsel certifies that the parties conferred concerning the disputed issues, i.e. application of the clergy-penitent privilege to the withheld documents. Such conferral included detailed written

correspondence and a telephone call. Those conversations have yielded no possibility of resolving any part of the contested issues.

DATED 3rd day of January, 2023.

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
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
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