

Exhibit C

DOCUMENTS WITHHELD BY WTNY BASED ON
CLERGY-PENITENT PRIVILEGE

Caekaert et al. v. Watchtower et al.

Rowland et al. v. Watchtower et al.

Description of Document Being Withheld	Discovery Request	Privilege Log Entry
Reports of Known Child Molesters in Montana Sent to WTNY in Response to the March 14, 1997 “All Bodies of Elders” Letter	RFP No. 10 (Caekaert / Mapley) RFP No. 9 - 11 (Rowland / Schulze)	27-36
Correspondence Between the Hardin Congregation and WTNY About known child molester, Gunnar Hain	RFP No. 13 (Caekaert / Mapley) RFP No. 11 (Rowland / Schulze)	37, 39
Correspondence Between the Hardin Congregation and WTNY About elder Martin Svenson	RFP No. 10 & 11 (Rowland / Schulze)	38
Disfellowship / Disassociation Form (S-77) for Bruce Mapley, Sr.	RFPs No. 11, 12 (Caekaert / Mapley) RFP No. 11 (Rowland / Schulze)	40

Caekaert / Mapley RFP Nos. 10, 11, 12, and 13

REQUEST FOR PRODUCTION NO. 10: Please produce all letters, emails, facsimiles, or other documentary, tangible, or electronically stored information of any kind you, or any other entity associated with Jehovah's Witnesses, received from congregations in Montana in response to the Body of Elder Letter dated March 14, 1997.

RESPONSE: WTNY objects to this Request for Production as it is contrary to Judge Watters' Order Re Motion to Compel Hardin Congregation's Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana's clergy-penitent privilege under Mont. Code Ann. § 26-1-804 to deny Plaintiffs' request for production. (Doc. 82, pp. 3-4) The same analysis applies if any other congregations in Montana wrote responsive letters. In addition, this request is overbroad and unduly burdensome as to scope, is not reasonably calculated to lead to the discovery of admissible information, and is not proportional to the needs of the case. Additionally, this request violates Responding Defendant and third-parties' privacy rights under the United States and Montana Constitutions.

Without waiving said objections, responsive letters are described in WTNY's privilege log (Privilege Log Nos. 27-36).

REQUEST FOR PRODUCTION NO. 11: Please produce all tangible or electronically stored information of any kind pertaining to any Plaintiff, including

but not limited to documents, database information, and letters, emails, facsimiles, any communication or information received from the Hardin Congregation, anyone associated with the Hardin Congregation, or any overseer whose territory includes or included the Hardin Congregation. This request specifically includes, but is not limited to, all records of communications to or from the Service Department and Legal Department pertaining to any Plaintiff.

RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY's produced privilege log are protected from disclosure by the attorney-client privilege under Montana law. *See Moe v. System Transp., Inc.*, 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v. Montana Second Judicial District Court*, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26-1-803). Further, WTNY objects to this Request for Production as it is contrary to Judge Watters' Order Re Motion to Compel Hardin Congregation's Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana's clergy-penitent privilege under Mont. Code Ann. § 26-1-804 to deny Plaintiffs' request for production. (Doc. 82,

pp. 3-4). Without waiving said objections, responsive communications are described in WTNY's privilege log (Privilege Log Nos. 1-3, 7-8, 10-11, 29, and 40-43). *See also* document produced as WTNY000214.

REQUEST FOR PRODUCTION NO. 12: Please produce all tangible or electronically stored information of any kind pertaining to Bruce Mapley Sr., including but not limited to documents, database information, and letters, emails, facsimiles, any communication or information received from the Hardin Congregation, anyone associated with the Hardin Congregation, or any overseer whose territory includes or included the Hardin Congregation. This request specifically includes, but is not limited to, all records of communications to or from the Service Department and Legal Department pertaining to Bruce Mapley Sr.

RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY's produced privilege log are protected from disclosure by the attorney-client privilege under Montana law. *See Moe v. System Transp., Inc.*, 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v. Montana Second Judicial District Court*, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26-1-803).

Further, WTNY objects to this Request for Production as it is contrary to Judge Watters' Order Re Motion to Compel Hardin Congregation's Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana's clergy-penitent privilege under Mont. Code Ann. § 26-1-804 to deny Plaintiffs' request for production. (Doc. 82, pp. 3-4). Without waiving said objections, responsive communications are described in WTNY's privilege log (Privilege Log Nos. 1-3, 7-8, 10-11, 29, and 40-44). *See also* document produced as WTNY000213.

REQUEST FOR PRODUCTION NO. 13: Please produce all tangible or electronically stored information of any kind pertaining to Gunner Hain, including but not limited to documents, database information, and letters, emails, facsimiles, any communication or information received from the Hardin Congregation, anyone associated with the Hardin Congregation, or any overseer whose territory includes or included the Hardin Congregation. This request specifically includes, but is not limited to, all records of communications to or from the Service Department and Legal Department pertaining to Gunner Hain.

RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the

Cross-Claimant,)
)
)
vs.)
)
BRUCE MAPLEY SR.,)
)
Cross-Claim Defendant.)
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_____)

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802.

COMES NOW Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and provides its first supplemental responses to Plaintiffs’ First Set of General Discovery as follows:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 13: Please produce all tangible or electronically stored information of any kind pertaining to Gunner Hain, including but not limited to documents, database information, and letters, emails, facsimiles, any communication or information received from the Hardin Congregation, anyone associated with the Hardin Congregation, or any overseer whose territory includes or included the Hardin Congregation. This request specifically includes, but is not

limited to, all records of communications to or from the Service Department and Legal Department pertaining to Gunner Hain.

RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY's produced privilege log are protected from disclosure by the attorney-client privilege under Montana law. *See Moe v. System Transp., Inc.*, 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v. Montana Second Judicial District Court*, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26-1-803). Further, WTNY objects to this Request for Production as it is contrary to Judge Watters' Order Re Motion to Compel Hardin Congregation's Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana's clergy-penitent privilege under Mont. Code Ann. § 26-1-804 to deny Plaintiffs' request for production. (Doc. 82, pp. 3-4). Without waiving said objections, responsive communications are described in WTNY's privilege log (Privilege Log Nos. 10, 11, 37, and 39). *See also* documents produced as WTNY000211-212 and 215.

FIRST SUPPLEMENTAL RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY's produced privilege log are protected from disclosure by the attorney-client privilege under Montana law. *See Moe v. System Transp., Inc.*, 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v. Montana Second Judicial District Court*, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26–1–803). Further, WTNY objects to this Request for Production as it is contrary to Judge Watters' Order Re Motion to Compel Hardin Congregation's Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana's clergy-penitent privilege under Mont. Code Ann. § 26–1–804 to deny Plaintiffs' request for production. (Doc. 82, pp. 3-4). Without waiving said objections, responsive communications are described in WTNY's privilege log (Privilege Log Nos. 10, 11, 37, and 39). WTNY corrects its previous bates numbering, *see also* documents produced as WTNY000215 and 222-223.

Rowland / Schulze RFP Nos. 9, 10, and 11

RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by a congregation elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY's produced privilege log are protected from disclosure by the attorney-client privilege under Montana law. *See Moe v. System Transp., Inc.*, 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v. Montana Second Judicial District Court*, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26-1-803).

Without waiving said objections, *see* WTNY's privilege log for a description of documents potentially responsive to this request (Privilege Log Nos 3, 4, 7-9, and 11-26).

REQUEST FOR PRODUCTION NO. 9: Please produce all letters, emails, facsimiles, or other documentary, tangible, or electronically stored information of any kind you, or any other entity associated with the Jehovah's Witnesses, received from congregations in Montana in response to the Body of Elder Letter dated March 14, 1997.

RESPONSE: WTNY objects to this Request for Production as it is contrary to Judge Watters' Order Re Motion to Compel Hardin Congregation's Subpoena

dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana's clergy-penitent privilege under Mont. Code Ann. § 26-1-804 to deny Plaintiffs' request for production. (Doc. 77, pp. 3-4) The same analysis applies if any other congregations in Montana wrote responsive letters. In addition, this request is overbroad and unduly burdensome as to scope, is not reasonably calculated to lead to the discovery of admissible information, and is not proportional to the needs of the case. Additionally, this request violates Responding Defendant and third-parties' privacy rights under the United States and Montana Constitutions.

Without waiving said objections, responsive letters are described in WTNY's privilege log (Privilege Log Nos. 27-36).

REQUEST FOR PRODUCTION NO. 10: Please produce all tangible or electronically stored information of any kind pertaining to any Plaintiff, including but not limited to documents, database information, and letters, emails, facsimiles, any communication or information received from the Hardin Congregation, anyone associated with the Hardin Congregation, or any overseer whose territory includes or included the Hardin Congregation. This request specifically includes, but is not limited to, all records of communications to or from the Service Department and Legal Department pertaining to any Plaintiff.

RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY's produced privilege log are protected from disclosure by the attorney-client privilege under Montana law. *See Moe v. System Transp., Inc.*, 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v. Montana Second Judicial District Court*, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26-1-803). Further, WTNY objects to this Request for Production as it is contrary to Judge Watters' Order Re Motion to Compel Hardin Congregation's Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana's clergy-penitent privilege under Mont. Code Ann. § 26-1-804 to deny Plaintiffs' request for production. (Doc. 77, pp. 3-4). Without waiving said objections, responsive communications are described in WTNY's privilege log (Privilege Log Nos. Nos. 5-7, 10-11, 16, 29, 38, and 41-42).

REQUEST FOR PRODUCTION NO. 11: Please produce all tangible or electronically stored information of any kind pertaining to Quintin Means, Phoebe Means, Gunner Hain, Joyce Hain, Martin Svenson, Millie Svenson, Bruce Mapley

COMES NOW Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and provides its first supplemental responses to Plaintiffs’ First Set of General Discovery as follows:

REQUEST FOR PRODUCTION NO. 11: Please produce all tangible or electronically stored information of any kind pertaining to Quintin Means, Phoebe Means, Gunner Hain, Joyce Hain, Martin Svenson, Millie Svenson, Bruce Mapley Sr., Gary Baker, Jay Donavan, Dale Hiebert, or Bill O’Neil, including but not limited to documents, database information, and letters, emails, facsimiles, any communication or information received from the Hardin Congregation, anyone associated with the Hardin Congregation, or any overseer whose territory includes or included the Hardin Congregation. This request specifically includes, but is not limited to, all records of communications to or from the Service Department and Legal Department.

RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY’s produced privilege log are protected from disclosure by the attorney-client privilege under Montana law.

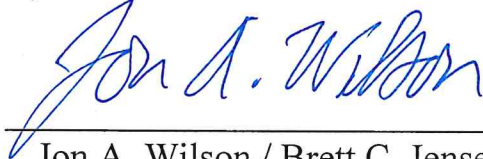
See Moe v. System Transp., Inc., 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v. Montana Second Judicial District Court*, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26–1–803). Further, WTNY objects to this Request for Production as it is contrary to Judge Watters’ Order Re Motion to Compel Hardin Congregation’s Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana’s clergy-penitent privilege under Mont. Code Ann. § 26–1–804 to deny Plaintiffs’ request for production. (Doc. 77, pp. 3-4). Without waiving said objections, responsive communications are described in WTNY’s privilege log (Privilege Log Nos. 1-11, 24, 29, 37-44). *See also* documents produced as WTNY000211-WTNY000213; WTNY000215-WTNY000221.

FIRST SUPPLEMENTAL RESPONSE: WTNY objects to this Request for Production as many of the documents involve (1) a communication by an elder or elders; (2) to an attorney; (3) in which legal advice was sought by an elder or elders and legal advice was given by an attorney; (4) in the course of the professional relationship. Therefore, the records of the subject communications as described in WTNY’s produced privilege log are protected from disclosure by the attorney-client privilege under Montana law. *See Moe v. System Transp., Inc.*, 270 F.R.D. 613, 622 (D. Mont. 2010) (citing *State ex rel United States Fidelity and Guaranty Co. v.*

Montana Second Judicial District Court, 240 Mont. 5, 11, 783 P.2d 911, 914 (1989); Mont. Code Ann. § 26–1–803). Further, WTNY objects to this Request for Production as it is contrary to Judge Watters’ Order Re Motion to Compel Hardin Congregation’s Subpoena dated July 30, 2021, that addressed the nature and content of a responsive letter from the Hardin Congregation in Montana and applied Montana’s clergy-penitent privilege under Mont. Code Ann. § 26–1–804 to deny Plaintiffs’ request for production. (Doc. 77, pp. 3-4). Without waiving said objections, responsive communications are described in WTNY’s privilege log (Privilege Log Nos. 1-11, 24, 29, 37-44). WTNY corrects its previous bates numbering, *see also* documents produced as WTNY000213, 215-223.

DATED this 31st day of March, 2022.

By: _____



Jon A. Wilson / Brett C. Jensen
BROWN LAW FIRM, P.C.

*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc.,*

TRACY CAEKAERT, ET AL. V. WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., ET AL
CAUSE NO. 1:20-CV-00052-SPW; UNITED STATES DISTRICT COURT, FOR THE DISTRICT OF MONTANA, BILLINGS DIVISION

ARIANE ROWLAND, ET AL. V. WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., ET AL
CAUSE NO. 1:20-CV-00059-SPW; UNITED STATES DISTRICT COURT, FOR THE DISTRICT OF MONTANA, BILLINGS DIVISION

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK INC'S SECOND SUPPLEMENTAL PRIVILEGE LOG

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
Watchtower Legal Department Records							
1.	07/22/1992	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Bruce Mapley, Sr.	PDF	A/C
2.	07/22/1992 through 10/01/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Ashland, WI; Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. Re: Legal Advice concerning Bruce Mapley, Sr., and Martin Svenson	Lotus Notes PDF	A/C; TP
3.	07/22/1992 through 10/01/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; Ashland, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. Re: Legal Advice Bruce Mapley, Sr., and Martin Svenson	HuB PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
4.	04/08/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Roebuck, Birmingham, AL, Congregation. Re: Legal Advice concerning Bruce Mapley, Sr.	HuB PDF	A/C
5.	03/26/1994	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, and Third Parties [P.M., A.A., and M.R.]	PDF	A/C; TP
6.	03/26/1994 through 12/10/2018	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, Bruce Mapley, Sr., and Third Parties [P.M., A.A., and M.R.]	Lotus Notes PDF	A/C; TP
7.	03/26/1994 through 12/10/2018	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, Bruce Mapley, Sr., and Third Parties [P.M., A.A., and M.R.]	HuB PDF	A/C; TP
8.	05/01/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. Re: Legal Advice concerning Martin Svenson	HuB PDF	A/C

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
9.	05/07/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. Re: Legal Advice concerning Martin Svenson	HuB PDF	A/C
10.	10/17/2019 and 12/13/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. Re: Legal Advice concerning Gunnar Hain	Lotus Notes PDF	A/C; TP
11.	10/17/2019 and 12/13/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. Re: Legal Advice concerning Gunnar Hain	HuB PDF	A/C; TP
12.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [A.A.]	HuB PDF	A/C; TP
13.	07/29/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [J.C.]	HuB PDF	A/C; TP
14.	01/16/2006 through 10/09/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [R.H.]	HuB PDF	A/C; TP
15.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Nellie Means	HuB PDF	A/C; TP
16.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [P.M.]	HuB PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
17.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [A.M.]	HuB PDF	A/C; TP
18.	04/02/2021	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [R.M.]	HuB PDF	A/C; TP
19.	12/05/2003	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [J.N.]	HuB PDF	A/C; TP
20.	11/01/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [K.R.]	HuB PDF	A/C; TP
21.	05/24/2018 through 06/15/2018	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [M.R.]	HuB PDF	A/C; TP
22.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party James Rowland	HuB PDF	A/C; TP
23.	04/23/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [M.S.]	HuB PDF	A/C; TP
24.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Mildred Svenson	HuB PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
25.	11/01/2014 through 09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [T.V.]	HuB PDF	A/C; TP
26.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [C.W.]	HuB PDF	A/C; TP
Correspondence (March 14, 1997, BOE Letter Responses)							
27.	04/19/1997	Letter	C.F. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [C.R.]	PDF	CP; TP
28.	04/24/1997	Letter	H.P. Congregation	Service Department	Confidential communication Re: seeking or receiving religious guidance, admonishment, or advice concerning Third Party [B.M.]	PDF	CP; TP
29.	04/25/1997	Letter	Hardin Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party Gunnar Hain [This specific communication has already been reviewed <i>in camera</i> by this Court and determined to be protected under Montana's clergy-penitent privilege under § 26-1-804 (see Court's order dated July 30, 2021, Doc #82 at pp. 3-4)]	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
30.	05/14/1997	Letter	E. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [M.C.]	PDF	CP; TP
31.	05/29/1997	Letter	L. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [L.J.]	PDF	CP; TP
32.	08/06/1997	Letter	T.B. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [G.J.]	PDF	CP; TP
33.	08/12/1997	Letter	B. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [T.M.]	PDF	CP; TP
34.	02/02/1999	Letter	E. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [N.O.]	PDF	CP; TP
35.	02/07/2000	Letter	Be. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [K.M.]	PDF	CP; TP
36.	04/06/2000	Letter	B.H. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [R.G.]	PDF	CP; TP
Correspondence (Other)							
37.	09/15/1997	Letter	Hardin Congregation	Pacific WA Congregation	Confidential communication Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
38.	09/14/1998	Letter	Hardin Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Martin Svenson	PDF	CP; TP
39.	09/27/1999	Letter	Service Department	Hardin Congregation	Confidential communication Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain	PDF	CP; TP
40.	10/14/1999	Form	Canyon Ferry Congregation, Helena, MT	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Bruce Mapley, Sr.	PDF	CP; TP
41.	05/05/2011	Letter	Hardin Congregation	Legal Department	Letter seeking legal advice Re: Threat of legal action in relation to Bruce Mapley, Sr., Gunnar Hain, and Martin Svenson	PDF	A/C
42.	06/15/2011	Memorandum	Legal Department	Service Department	Attorney providing legal advice. Re: Bruce Mapley, Sr., Gunnar Hain, and Martin Svenson	PDF	A/C
43.	12/26/2014	Memorandum	Service Department	Legal Department	Memo seeking legal advice. Re: Bruce Mapley, Sr.	PDF	A/C
44.	01/02/2015	Memorandum	Legal Department	Service Department	Attorney providing legal advice. Re: Bruce Mapley, Sr.	PDF	A/C
Watchtower Legal Department Client Intake Forms							
45.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving David Means and Nellie Means	PDF	A/C; TP
46.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving David Means and Third Party [P.M.]	PDF	A/C; TP
47.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]	PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
48.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]	PDF	A/C; TP
49.	04/30/2020	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Legal issue involving third party unrelated to this litigation [M.S.]	PDF	A/C; TP
Amended Entries [09/26/2022]							
50.	01/06/1996	Notes	Hardin Congregation	N/A	Internal note documenting legal advice received by the Hardin Congregation from Watchtower New York Legal Department. [See Hardin Congregation Privilege Log]	PDF	A/C; TP
51.	01/04/1997	Notes	Hardin Congregation	N/A	Internal notes by Hardin congregation elders documenting ecclesiastical communications made in confidence to the elders for the purpose of seeking or receiving religious guidance, admonishment, or advice. [This specific document has already been reviewed <i>in camera</i> by this Court and certain portions were determined to be protected under Montana's clergy-penitent privilege under § 26-1-804 (see Court's order dated September 20, 2021, Doc #77 at pp. 3-4). This item has already been produced by the Hardin Congregation (see ROW_HARDIN000105-108) and is being reproduced in identical redacted form in accordance with this Court's decision. See document bates-numbered WTNY 000770-000773]	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
52.	02/19/1997	Notes	Hardin Congregation	N/A	Internal notes by Hardin Congregation elders documenting ecclesiastical communications made in confidence to the elders for the purpose of seeking or receiving religious guidance, admonishment, or advice. [<i>see Hardin Congregation Privilege Log. This specific document has already been reviewed in camera by this Court and determined to be protected under Montana's clergy-penitent privilege under § 26-1-804 (see Court's order dated September 20, 2021, Doc #77 at p. 5)</i>].	PDF	CP; TP

Key:

A/C = Attorney-Client Privilege

CP = Clergy-Penitent Privilege

TP = Third-Party Privacy

Date: September 26, 2022

Submitted by Brown Law Firm, P.C., on behalf of Defendant Watchtower Bible and Tract Society of New York, Inc.