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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., and
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,

Defendants,

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC., and
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

Cause No. CV-20-52-BLG-SPW

AND

Cause No. CV 20-59-BLG-SPW

**PLAINTIFFS' MOTION TO
COMPEL PRODUCTION OF
ALL DISCOVERABLE
DOCUMENTS AND
INFORMATION AT THE
JEHOVAH'S WITNESSES'
NEW YORK
HEADQUARTERS**

| | |
|-----------------------------|---|
| 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, by and through their undersigned counsel, and pursuant to Rules 26, 33, 34, 36, and 37 of the Federal Rules of Civil Procedure, hereby respectfully move the Court for an order compelling Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) to search for and produce all requested information and documents located at the Jehovah’s Witnesses’ New York headquarters. A brief in support of this Motion is being filed contemporaneously herewith.

Pursuant to L.R. 26.3 (c), Plaintiffs’ counsel certifies that the parties conferred regarding the disputed issues, i.e. the scope of the search and control over documents located at the Jehovah’s Witnesses’ New York headquarters exercised by WTNY. Such conferral included multiple written communications

and at least one phone call, where WTNY plainly stated that it would only search and produce documents that it considers to be in the control of WTNY.

Because the scope of WTNY's search for responsive information and documents is the disputed matter, every single discovery request served by Plaintiffs and WTNY's responses thereto are at issue. As such, pursuant to L.R. 26.3(c)(2)(C), a copy of all discovery requests and WTNY's responses are attached hereto.

DATED 13th 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
Attorneys for Plaintiffs