

Exhibit C

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA)	Cause No. CV 20-52-BLG-SPW
MAPLEY,)	
)	
Plaintiffs,)	DEFENDANT WATCHTOWER
)	BIBLE AND TRACT SOCIETY OF
)	NEW YORK INC.'S RESPONSES
vs.)	TO PLAINTIFFS' SECOND SET OF
)	COMBINED INTERROGATORIES,
WATCHTOWER BIBLE AND)	REQUESTS FOR PRODUCTION,
TRACT SOCIETY OF NEW YORK,)	AND REQUESTS FOR ADMISSION
INC., WATCH TOWER BIBLE AND)	
TRACT SOCIETY OF)	
PENNSYLVANIA, and BRUCE)	
MAPLEY SR.,)	
)	
Defendants.)	
)	
)	
WATCHTOWER BIBLE AND)	
TRACT SOCIETY OF NEW YORK,)	
INC.)	
)	
)	

RESPONSE: *See* Response to Request for Production No. 29.

REQUEST FOR PRODUCTION NO. 32: Please produce all correspondence from any circuit or district overseer that mentions any Plaintiff or Bruce Mapley Sr. or Gunner Hain.

RESPONSE: After a diligent search, WTNY has been unable to locate any information responsive to this request.

REQUEST FOR PRODUCTION NO. 33: Please produce the “supplemental letter” referred to in ROW_HARDIN000058.

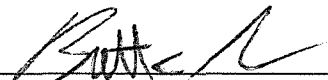
RESPONSE: After a diligent search, WTNY has been unable to locate any information responsive to this request.

REQUEST FOR PRODUCTION NO. 34: Please produce all S309a forms for any circuit overseer who served the Hardin Congregation at any time during 1970-1995.

RESPONSE: After a diligent search, WTNY has been unable to locate any information responsive to this request.

REQUEST FOR PRODUCTION NO. 35: Please produce all documents, including but not limited to drafts, redlines, and internal communications, related to The Watchtower article, “Comfort for those with a ‘stricken spirit’” (produced at Bates CAEKAERT/MAPLEY 003258–003262).

DATED this 16th day of June, 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.,*

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

ARIANE ROWLAND, and JAMIE
SCHULZE,

Plaintiffs,

vs.

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

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCHTOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK INC.'S RESPONSES
TO PLAINTIFFS' SECOND SET OF
COMBINED INTERROGATORIES,
REQUESTS FOR PRODUCTION,
AND REQUESTS FOR ADMISSION**

RESPONSE: None existed for the time-period in question.

REQUEST FOR PRODUCTION NO. 29: Please produce all versions of the Kingdom Ministry School Course in effect from the years 1970 to 1995.

RESPONSE: *See* Response to Request for Production No. 27.

REQUEST FOR PRODUCTION NO. 30: Please produce all correspondence from any circuit or district overseer that mentions any Plaintiff or Quintin Means, Phoebe Means, Gunner Hain, Joyce Hain, Martin Svenson, Millie Svenson, Bruce Mapley Sr., Gary Baker, Jay Donovan, Dale Hiebert, or Bill O'Neil.

RESPONSE: After a diligent search, WTNY has been unable to locate any information responsive to this request.

REQUEST FOR PRODUCTION NO. 31: Please produce the “supplemental letter” referred to in ROW_HARDIN000058.

RESPONSE: After a diligent search, WTNY has been unable to locate any information responsive to this request.

REQUEST FOR PRODUCTION NO. 32: Please produce all S309a forms for any circuit overseer who served the Hardin Congregation at any time during 1970-1995.

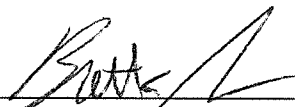
RESPONSE: After a diligent search, WTNY has been unable to locate any information responsive to this request.

outside of the legal department, and the purpose of the communications were solely to provide legal advice. Without waiving said objection, deny.

REQUEST FOR ADMISSION NO. 25: Please admit that Harold Rimby was your employee, officer, director, official, volunteer, representative, or agent while he served as an elder and ministerial servant of the Hardin Congregation.

ANSWER: Deny.

DATED this 16th day of June, 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.,*