

Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
Meyer, Shaffer & Stepan, PLLP
430 Ryman Street
Missoula, MT 59802
Tel: (406) 543-6929
Fax: (406) 721-1799
rob@mss-lawfirm.com
ryan@mss-lawfirm.com
james@mss-lawfirm.com
Attorneys for Plaintiffs

Matthew L. Merrill (appearing *pro hac vice*)
Merrill Law, LLC
6631 Mariposa Court
Denver, CO 80221
Tel: (303) 947-4453
matthew@merrillwaterlaw.com

**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 Claimants,

BRUCE MAPLEY, SR.,

Cross Defendant.

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

AND

Cause No. CV 20-59-BLG-SPW

**PLAINTIFFS' MOTION TO
COMPEL *IN CAMERA*
REVIEW OF DOCUMENTS
WITHHELD ON THE BASIS
OF ATTORNEY-CLIENT
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, by and through their undersigned counsel, and pursuant to Rules 34 and 37 of the Federal Rules of Civil Procedure, hereby respectfully move the Court for an order compelling *in camera* review of documents withheld by Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) under the attorney-client privilege. 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 exact nature of the privilege being asserted and how it applied to the withheld documents. Such conferral included multiple written communications and at least one phone call, where WTNY stated that it would not submit the withheld document to the Court for *in camera* review.

Pursuant to L.R. 26.3(c)(2)(C), a copy of all relevant discovery requests and WTNY's responses are attached as an exhibit to the brief in support being filed contemporaneously herewith.

DATED 18th 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.

DATED 18th day of January, 2023.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer

Ryan R. Shaffer

MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs