

Exhibit D

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

**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' FOURTH SET
)	OF COMBINED
WATCHTOWER BIBLE AND)	INTERROGATORIES, REQUESTS
TRACT SOCIETY OF NEW YORK,)	FOR PRODUCTION, AND
INC., WATCH TOWER BIBLE AND)	REQUESTS FOR ADMISSION
TRACT SOCIETY OF)	
PENNSYLVANIA, and BRUCE)	
MAPLEY SR.,)	
)	
Defendants.)	
)	
)	
WATCHTOWER BIBLE AND)	
TRACT SOCIETY OF NEW YORK,)	
INC.)	
)	

REQUEST FOR PRODUCTION NO. 84: Please produce all documents showing any arrangements, agreements, and contracts between you and the Governing Body.

RESPONSE: WTNY objects to this Request for Production in that it is overbroad as to time and scope. *See* Doc. 85, p. 7 (Court concluding documents and information produced after 1992 are irrelevant to demonstrate Plaintiffs' claims). Subject to and without waiving these objections, none.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 27: Please admit that during the time period 1973 to 1992, elders at the Hardin congregation were agents of WTNY.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 28: Please admit that during the time period 1973 to 1992, elders in the Service Department were agents of WTNY.

ANSWER: WTNY admits that certain elders in the Service Department were agents of WTNY when communicating by means of WTNY letterhead, and answering phone calls related to spiritual topics. WTNY denies the remainder of this Request for Admission.

Witnesses throughout the U.S. was communicated to those congregations through WTNY.

ANSWER: Admit.

REQUEST FOR ADMISSION NO. 33: Please admit that during the time period 1973 to 1992 elders in the Service Department, communicating on behalf of WTNY monitored the functioning, organization, and staffing of congregations of Jehovah's Witnesses throughout the U.S., to include the Hardin Congregation.

ANSWER: WTNY objects to this Request for Admission on the grounds that the term "monitored" is vague and ambiguous. To the extent that the term "monitored" is limited to WTNY receiving periodic reports about congregations' preaching activities and bi-annual reports from circuit overseers, WTNY admits.

DATED this 2nd day of December, 2022.

By: 

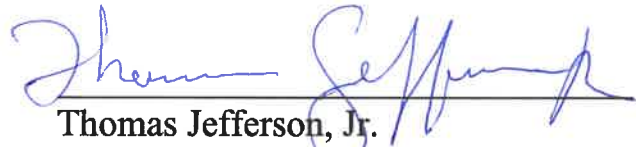
Jon A. Wilson / Brett C. Jensen

BROWN LAW FIRM, P.C.

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

VERIFICATION

Thomas Jefferson, Jr., states that he has read the foregoing (*Defendant WTNY's Responses to Plaintiffs' Fourth Set of Combined Interrogatories, Requests for Production, and Requests for Admission*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.


Thomas Jefferson, Jr.

Dated: 12/24/2022

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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' FOURTH SET
OF COMBINED
INTERROGATORIES, REQUESTS
FOR PRODUCTION, AND
REQUESTS FOR ADMISSION**

RESPONSE: WTNY objects to this Request for Production in that it is overbroad as to time and scope. *See* Doc. 72, p. 7 (Court concluding documents and information produced after 1992 are irrelevant to demonstrate Plaintiffs' claims). Subject to and without waiving these objections, none.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 27: Please admit that during the time period 1973 to 1992, elders at the Hardin congregation were agents of WTNY.

ANSWER: Deny.

REQUEST FOR ADMISSION NO. 28: Please admit that during the time period 1973 to 1992, elders in the Service Department were agents of WTNY.

ANSWER: WTNY admits that certain elders in the Service Department were agents of WTNY when communicating by means of WTNY letterhead, and answering phone calls related to spiritual topics. WTNY denies the remainder of this Request for Admission.

REQUEST FOR ADMISSION NO. 29: Please admit that prior to March 2001, communications from the U.S. Branch Office to local congregations about how to handle reports of child sex abuse were done on behalf of WTNY

ANSWER: WTNY objects to this Request for Admission on the grounds that the term "how to handle reports" is vague and ambiguous. Subject to and without waiving this objection, WTNY admits that prior to 2001, communications between

congregations of Jehovah's Witnesses throughout the U.S., to include the Hardin Congregation.

ANSWER: WTNY objects to this Request for Admission on the grounds that the term "monitored" is vague and ambiguous. To the extent that the term "monitored" is limited to WTNY receiving periodic reports about congregations' preaching activities and bi-annual reports from circuit overseers, WTNY admits.

DATED this 2nd day of December, 2022.

By: _____



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*Attorneys for Defendants Watchtower
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VERIFICATION

Thomas Jefferson, Jr., states that he has read the foregoing (*Defendant WTNY's Responses to Plaintiffs' Fourth Set of Combined Interrogatories, Requests for Production, and Requests for Admission*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.


Thomas Jefferson, Jr.

Dated: 12/2/2022