

Exhibit E

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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
MAPLEY,

Plaintiffs,

vs.

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

Defendants.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cause No. CV 20-52-BLG-SPW

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

REQUEST FOR PRODUCTION NO. 40: Please produce a copy of all Attorney-Client agreements between the WTNy Legal Department and the Hardin Congregation, or any person associated with the Hardin Congregation, executed between 1970 to 1995.

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 this objection, none.

REQUEST FOR PRODUCTION NO. 41: Please produce a copy of all documents from 1970 to 1995 that show the policy and procedures for maintaining Clergy-Penitent Privilege and Attorney-Client Privilege information received by the WTNy Legal Department.

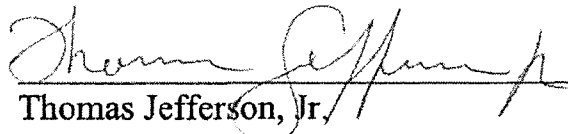
RESPONSE: WTNy objects to this Request for Production in that it is overbroad as to time and scope. *See* Doc. 85, p. 7 (Court concluding documents and information produced after 1992 are irrelevant to demonstrate Plaintiffs' claims). Subject to and without waiving this objection, WTNy has maintained no independent policy for attorneys and paralegals, however attorneys in WTNy's Legal Department adhered to guidelines established by their respective bars and paralegals working under their direction adhered to the same.

DATED this 26th day of August, 2022.

By: Jon A. Wilson
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' Third 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: 8/23/2022

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

2; 1 Corinthians 13:4, 5; and 1 John 3:19, 20, among others. WTNY is unaware of any other “policies and procedures” responsive to this Interrogatory subpart.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 36: Please produce a copy of all notes or statements taken during any communication with Phillip Marshall.

RESPONSE: None.

REQUEST FOR PRODUCTION NO. 37: Please produce a list of all attorneys and paralegals in the WTNY Legal Department from 1970 to 1995.

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 this objection, see document bates numbered WTNY000576-000577, which is being produced subject to the Stipulated Confidentiality Agreement and Protective Order (Doc. 110-1).

REQUEST FOR PRODUCTION NO. 38: Please produce a copy of all Attorney-Client agreements between the WTNY Legal Department and the Hardin Congregation, or any person associated with the Hardin Congregation, executed between 1970 to 1995.

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 this objection, none.

REQUEST FOR PRODUCTION NO. 39: Please produce a copy of all documents from 1970 to 1995 that show the policy and procedures for maintaining Clergy-Penitent Privilege and Attorney-Client Privilege information received by the WTNY Legal Department.

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 this objection, WTNY has maintained no independent policy for attorneys and paralegals, however attorneys in WTNY's Legal Department adhered to guidelines established by their respective bars and paralegals working under their direction adhered to the same.

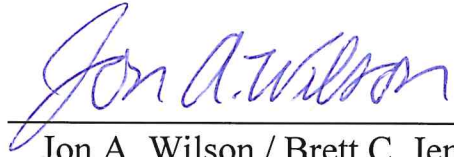
REQUEST FOR PRODUCTION NO. 40: Please produce a copy of all documents from 1970 to 1995 that indicate who qualifies as Clergy in the Jehovah's Witnesses organization.

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). WTNY further objects to this Interrogatory on the grounds that it is vague and

REQUEST FOR ADMISSION NO. 26: Please admit that you do not have a copy of the July 13, 2011 correspondence from the Hardin Congregation to the WTNY Legal Department seeking legal advice.

ANSWER: WTNY admits that it has conducted a diligent search and has been unable to locate correspondence from the Hardin Congregation dated July 13, 2011.

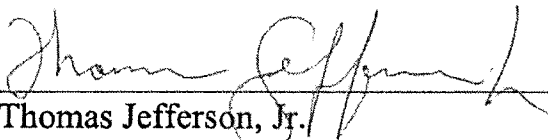
DATED this 26th day of August, 2022.

By: 

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Thomas Jefferson, Jr.

Dated: 8/23/2022