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**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' UNOPPOSED  
MOTION FOR STATUS  
CONFERENCE**

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.	)
	)

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Plaintiffs, by and through undersigned counsel, hereby respectfully request that the Court convene a status conference for the purpose of discussing the setting of depositions in advance of the current discovery deadline of March 31, 2023. In particular:

1. Plaintiffs are attempting to set and take all depositions prior to the current discovery deadline;
2. At the same time, numerous motions to compel discovery that stand to impact the scope and sequence of those depositions are pending before the Court; and
3. WTNY has expressed the possibility of objecting to topics in Plaintiffs' Rule 30(b)(6) Notice and it is not clear that those objections will be capable of resolution before the current discovery deadline.

Therefore, Plaintiffs request a status conference to discuss the efficiency and desirability of completing discovery in this posture.

Defendants were contacted regarding this Motion and do not oppose it. A proposed Order is attached hereto and will be emailed to the Court pursuant to L.R. 7.1.

DATED 19<sup>th</sup> 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 19<sup>th</sup> day of January, 2023.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer

Ryan R. Shaffer

MEYER, SHAFFER & STEPANS PLLP

*Attorneys for Plaintiffs*