

Guy W. Rogers
Jon A. Wilson
Aaron M. Dunn
BROWN LAW FIRM, P.C.
315 North 24th Street
P.O. Drawer 849
Billings, MT 59103-0849
Tel. (406) 248-2611
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)
MILLER MCNAMARA & TAYLOR LLP
100 South Bedford Road, Suite 340
Mount Kisco, New York 10549
Tel./E-Fax (845) 288-0844
*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,
and Watch Tower Bible and Tract Society of Pennsylvania*

**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.

Cause No. CV 20-52-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S RESPONSES
TO PLAINTIFFS' FIRST SET OF
JURISDICTIONAL DISCOVERY**

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE,

Plaintiffs,

vs.

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

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S RESPONSES
TO PLAINTIFFS' FIRST SET OF
JURISDICTIONAL DISCOVERY**

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of
Pennsylvania (hereinafter "WTPA"), by and through its attorneys, and responds to
Plaintiffs' First Set of Jurisdictional Discovery as follows:

Defendant Watch Tower Bible and Tract Society of Pennsylvania's Responses to
Plaintiffs' First Set of Jurisdictional Discovery - 2

INTERROGATORIES

INTERROGATORY NO. 1: Please identify your record custodian for the years 1970 to the present.

ANSWER: WTPA did not have a record custodian during the time period at issue; rather, it has had a Corporate Secretary charged with maintaining essential legal and property records. WTPA's Corporate Secretary from 1970 through 1983 was Grant Suiter, who is now deceased. WTPA's Corporate Secretary from 1984-1999 was Lyman Swingle, who is now deceased. WTPA's Corporate Secretary from 2000-2003 was Richard Abrahamson, who is now deceased. WTPA's current Corporate Secretary, Danny Bland, has held the position since 2004.

INTERROGATORY NO. 2: Please identify each person who held the position of Ministerial Servant at the Jehovah Witness Hardin Congregation from 1970 to 1995.

ANSWER: Unknown.

INTERROGATORY NO. 3: Please identify each person who held the position of Elder at the Jehovah Witness Hardin Congregation from 1970 to 1995.

ANSWER: Unknown.

INTERROGATORY NO. 4: Please identify the period of time for which Phillip Brumley has served as WTPA's general counsel.

ANSWER: Mr. Brumley has been WTPA's general counsel since 1988.

INTERROGATORY NO. 5: Please set forth the hierarchal structure and organization of the Jehovah's Witnesses, including a description of how congregations, districts, circuits, branches are all related.

ANSWER: WTPA is not the religion known as Jehovah's Witnesses. However, WTPA is aware that Kingdom Halls of Jehovah's Witnesses are places of worship that are independently owned and operated by corporations or trusteeships formed by congregations, and that congregations are made up of Christians (publishers), some of whom serve as elders or ministerial servants. Publishers, their children, and interested ones often worship together on a weekly basis. A Circuit is a group of congregations (approximately 20) in a geographical area that gather together for larger worship events twice a year. A District was a group of Circuits (approximately 10) in a geographical area that formerly worshipped together once a year. A Branch office is akin to a national office that provides ecclesiastical (religious) assistance to congregations. Circuits, Districts, and Branch offices are religious constructs without legal form and have no legal, financial, or contractual control over congregations.

INTERROGATORY NO. 6: Please identify each of your publications that you distributed to the Jehovah's Witnesses congregations during the time period 1970 to 1995.

ANSWER: WTPA did not distribute publications during that timeframe. As a copyright holder and occasional publisher, WTPA made publications available to the public upon request. WTPA is the copyright holder of each issue of The Watchtower magazine, each issue of the Awake! magazine, several editions of The Bible, many books, brochures, and tracts. Some notable publications available to congregations during the time period inquired about include: Aid to Bible Understanding, published in 1971; Insight on the Scriptures, published in 1988; All Scripture is Inspired of God and Beneficial, published in 1990; Choosing the Best Way of Life, published in 1979; God's Eternal Purpose Now Triumphant for Man's Good, published in 1974; God's Kingdom of a Thousand Years Has Approached, published in 1973; Good News – to Make You Happy, published in 1976; Happiness – How to Find it, published in 1980; Holy Spirit – The Force Behind the Coming New Order, published in 1976; Is This Life All There Is?, published in 1974; Knowledge That Leads to Everlasting Life, published in 1995; Let Your Kingdom Come, published in 1981; Life—How Did it Get Here? By Evolution or by Creation?, published in 1985; Life Does Have a Purpose, published in 1977; Let Your Kingdom Come, published in 1981; Listening to the Great Teacher, published in 1971; Making Your Family Life Happy, published in 1978; Mankind's Search for God, published in 1990; Man's Salvation out of World Distress, published in 1975; Our Incoming World Government-God's Kingdom,

published in 1977; Paradise Restored to Mankind – by Theocracy!, published in 1972; Reasoning From the Scriptures, published in 1989; Revelation – It’s Grand Climax At Hand!, published in 1988; Survival Into a New Earth, published in 1984; The Bible – God’s Word or Man’s?, published in 1989; The Nations Shall Know That I Am Jehovah – How?, published in 1971; The Truth That Leads to Eternal Life, published in 1981; Theocratic Ministry School Guidebook, published in 1992; True Peace and Security – From What Source?, published in 1973; True Peace and Security – How Can You Find It?, published in 1986; United in Worship of the Only True God, published in 1983; Worldwide Security Under the Prince of Peace, published in 1986; You Can Live Forever in Paradise on Earth, published in 1989; and Your Youth – Getting the Best out of it, published in 1976.

An annual Yearbook of Jehovah’s Witnesses was published each of the years inquired about.

Starting in the 1970s, WTPA began ceasing its function as a publisher of religious publications and ended that function in its entirety by 1988. Since that time, Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), has been the publisher of record in the United States and has made available for distribution religious publications to congregations in the United States.

INTERROGATORY NO. 7: Please identify each of your publications that you distributed to the Jehovah's Witnesses congregations in Montana during the time period 1970 to 1995.

ANSWER: See Answer to Interrogatory No. 6.

INTERROGATORY NO. 8: Please identify each of your publications that you distributed to the Jehovah's Witnesses Hardin congregation during the time period of 1970 to 1995.

ANSWER: See Answer to Interrogatory No. 6.

INTERROGATORY NO. 9: Please identify the general categories of documents or correspondence you sent to the Hardin congregation during the time period 1970 to 1995.

ANSWER: None known, as after diligent search and reasonable inquiry, no records were found that showed WTPA ever sent any documents or correspondence to the Hardin Congregation during the period 1970 to 1995.

INTERROGATORY NO. 10: Please describe all of your activities and conduct within the state of Montana during the period of 1970 to 1995.

ANSWER: WTPA had no activities or conduct in Montana during the period of 1970 to 1995, except that its copyrighted material was available to Montana residents upon request. It is possible that Montana residents donated to WTPA and that WTPA accepted those donations.

INTERROGATORY NO. 11: Please identify all district overseers who served the Hardin congregation between 1970 and 1995.

ANSWER: Unknown.

INTERROGATORY NO. 12: Please identify all circuit overseers who served the Hardin congregation between 1970 and 1995.

ANSWER: Unknown.

INTERROGATORY NO. 13: Please identify all Jehovah's Witnesses congregations in Montana from 1970 to the present day.

ANSWER: Unknown.

INTERROGATORY NO. 14: Please identify all branch offices responsible for overseeing the Jehovah's Witnesses congregations in Montana.

ANSWER: Since 2001, the United States Branch Office of Jehovah's Witnesses provides ecclesiastical oversight and assistance to Montana congregations. Prior to 2001 there was no branch office for the United States; instead, ecclesiastical oversight was provided by members of the religious order of Jehovah's Witnesses without use of the religious construct known as a "branch office".

INTERROGATORY NO. 15: Please identify the presiding overseer(s) of the Hardin congregation from 1970 -1995.

ANSWER: Unknown.

INTERROGATORY NO. 16: Please identify the Hardin congregation secretary(s) from 1970-1995.

ANSWER: Unknown.

INTERROGATORY NO. 17: Please identify all members of any judicial committees for the Hardin congregation from 1970-1995.

ANSWER: Unknown.

INTERROGATORY NO. 18: Please identify the date the Watchtower Bible and Tract Society of New York ceased operating as a subsidiary of WTPA.

ANSWER: WTNY has never operated as a subsidiary of WTPA.

INTERROGATORY NO. 19: Please describe the general manner in which Jehovah's Witnesses' elders are trained to perform their function at the local congregation level during the period of 1970 to 1995, including identification of what documents the elders were provided.

ANSWER: As with all publishers, elders receive spiritual education through the weekly meetings using the Bible as the primary text. In addition, from time to time (at least once every 5-7 years) elders participate in study sessions centering on the use of Bible principles to address matters of everyday life. Those sessions range in duration from one day to up to a week in length and are known as Kingdom Ministry School. The sessions are generally held in a Kingdom Hall near where a majority of elders in a circuit reside.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce a copy of all correspondence you sent to the Hardin Congregation of Jehovah's Witnesses, or to the Elders or other representatives of the Hardin Congregation of Jehovah Witnesses, during the period of 1970 to 1995.

RESPONSE: None known, as after diligent search and reasonable inquiry, no records were found that showed WTPA ever sent any documents or correspondence to the Hardin Congregation or to the elders of that congregation during the period 1970 to 1995.

REQUEST FOR PRODUCTION NO. 2: Please produce a copy of all correspondence sent to WTPA by any Jehovah's Witness Montana congregation, or the Elders or other representatives of such local congregations, from 1970 to 1995.

RESPONSE: None known, as after diligent search and reasonable inquiry, no records were found that showed WTPA ever received any correspondence from any "Jehovah's Witness Montana congregation" or from the elders "or other representatives" of such location congregations during the period 1970 to 1995.

REQUEST FOR PRODUCTION NO. 3: Please produce a copy of all correspondence sent to any Jehovah's Witness local congregation in Montana, or

to the Elders or other representatives of such local congregations, by WTPA during the period 1970 to 1995.

RESPONSE: None known, as after diligent search and reasonable inquiry, no records were found that showed WTPA ever sent any documents or correspondence to any Jehovah's Witness local congregation in Montana or to the elders "or other representatives" of such local congregations during the period 1970 to 1995.

REQUEST FOR PRODUCTION NO. 4: Please produce a copy of all correspondence or other documents that appear on WTPA letterhead that were sent to the Hardin Congregation of Jehovah Witnesses, or to the Elders or other representatives of such local congregation, by any Watch Tower or other Jehovah's Witness entity from 1970 to 1995.

RESPONSE: None known, as after diligent search and reasonable inquiry, no records were found that showed WTPA or any other Jehovah's Witnesses entity ever sent any documents or correspondence on WTPA letterhead to the Hardin Congregation of Jehovah's Witnesses, or to the elders "or other representatives" of such local congregations during the period 1970 to 1995.

REQUEST FOR PRODUCTION NO. 5: Please produce a copy of all correspondence or other documents that appear on WTPA letterhead that were sent to any Jehovah's Witness local congregation in Montana, or to the Elders or other

representatives of such local congregations, by any Watch Tower or other Jehovah's Witness entity from 1970 to 1995.

RESPONSE: None known, as after diligent search and reasonable inquiry, no records were found that showed WTPA or any other Jehovah's Witnesses entity ever sent any documents or correspondence on WTPA letterhead to any Jehovah's Witness local congregation in Montana or to the elders "or other representatives" of such local congregations during the period 1970 to 1995.

REQUEST FOR PRODUCTION NO. 6: Please produce a copy of all Jehovah's Witness related books, magazines, publications, or other materials you distributed to the Hardin Congregation of Jehovah's Witnesses, or to the Elders or other representatives of the Hardin Congregation of Jehovah's Witnesses, during the period 1970 to 1995.

RESPONSE: WTPA did not distribute publications during that timeframe. As a copyright holder and occasional publisher, WTPA made publications available to the public upon request.

REQUEST FOR PRODUCTION NO. 7: Please produce a copy of all Jehovah's Witness related books, magazines, publications, or other materials you sent to any Jehovah's Witness local congregations to Montana, or to the Elders or other representative of such local congregations, during the period 1970 to 1995.

RESPONSE: WTPA did not send publications during that timeframe. As a copyright holder and occasional publisher, WTPA made publications available to the public upon request.

REQUEST FOR PRODUCTION NO. 8: Please produce a copy of all books, magazines, publications, or other materials for which WTPA owns the copyright that were published between 1970 and 1995.

RESPONSE: Responsive documents are being gathered and will be produced subject to resolution of issues relating to costs and format.

REQUEST FOR PRODUCTION NO. 9: Please produce a copy of all letters addressed to “All Congregations” (or if called something different at any time, all substantially similar documents) that appear on WTPA letterhead or were signed by WTPA or a representative thereof that are dated between 1970 and 1995.

RESPONSE: None known, as after diligent search and reasonable inquiry, no records were found that showed WTPA or any other Jehovah’s Witnesses entity ever sent any letters addressed to “All Congregations” or substantially similar documents on WTPA letterhead or signed by WTPA or a representative thereof during the period 1970 to 1995.

REQUEST FOR PRODUCTION NO. 10: Please produce a copy of all letters addressed to “All Bodies of Elders” (or if called something different at any

time, all substantially similar documents) that appear on WTPA letterhead or were signed by WTPA or a representative thereof that are dated between 1970 and 1995.

RESPONSE: None known, as after diligent search and reasonable inquiry, on records were found that showed WTPA or any other Jehovah's Witnesses entity ever sent any letters addressed to "All Bodies of Elders" or substantially similar documents on WTPA letterhead or signed by WTPA or a representative thereof during the period 1970 to 1995.

REQUEST FOR PRODUCTION NO. 11: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Defendant Bruce Mapley, Sr.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 12: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Gunner Haines.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 13: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Joyce Haines.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 14: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Martin Svenson.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 15: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Quentin Means.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 16: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary

records, related to any investigations of wrongdoing committed or alleged to have been committed by Phoebe Means.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 17: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Millie Svenson.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 18: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Jim Warnock.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 19: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Gary Baker.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 20: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Jay Donovan.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 21: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Dale Hiebert.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 22: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by Bill O'Neil.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 23: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by any member of the Jehovah's Witnesses' local Hardin, Montana congregation between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 24: Please produce a copy of all documents, including investigative reports, correspondence, and disciplinary records, related to any investigations of wrongdoing committed or alleged to have been committed by any member of any Jehovah's Witnesses congregation in Montana between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 25: Please produce a copy of the Kingdom Ministry School Course (or if called something different at any time, all substantially similar documents) you published in 1972 to train congregational elders.

RESPONSE: See documents produced herewith as WTPA000001-WTPA000136.

REQUEST FOR PRODUCTION NO. 26: Please produce a copy of all Kingdom Ministry School Courses (or if called something different at any time, all substantially similar documents) you published subsequent to the 1972 version until 1995.

RESPONSE: None.

REQUEST FOR PRODUCTION NO. 27: Please produce a copy of all versions of “Pay Attention to Yourselves and to All the Flock” (or if called something different at any time, all substantially similar documents) that were provided to any elder of the Jehovah’s Witnesses’ Hardin congregation service between 1970-1995.

RESPONSE: While WTPA does not know if elders in the Hardin Congregation “were provided” with the publication identified in Request for Production No. 27, the identified publication is produced herewith as WTPA000137-WTPA000292. Upon information and belief, co-defendant WTNY may have versions of the publication not published or copyrighted by this defendant.

REQUEST FOR PRODUCTION NO. 28: Please produce a copy of all Field Service Reports (Form S-81) (or if called something different at any time, all substantially similar documents) for all Jehovah’s Witnesses’ Montana congregations dated between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 29: Please produce a copy of all Missionary Home Reports (Form A-24) (or if called something different at any time, all substantially similar documents) dated between 1970 and 1995 for all Jehovah's Witnesses' missionaries operating in Montana.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 30: Please produce a copy of the Application for Congregation (Form S-51) (or if called something different at any time, all substantially similar documents) for the Jehovah's Witnesses' Montana congregations dated between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 31: Please produce a copy of all Applications for Congregation (Form S-51) (or if called something different at any time, all substantially similar documents) dated between 1970 and 1995 for each Jehovah's Witnesses' congregation in Montana.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 32: Please produce a copy of all Congregation Record Cards (Form S-68) (or if called something different at any time, all substantially similar documents) for all Jehovah's Witnesses' congregations in Montana between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 33: Please produce a copy of all Congregation Report Cards (Form S-1) (or if called something different at any time, all substantially similar documents) for all Jehovah's Witnesses' congregations in Montana between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 34: Please produce a copy of all Jehovah's Witnesses' territory maps (or if called something different at any time, all substantially similar documents) for Montana between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 35: Please produce a copy of all Jehovah's Witnesses' County Cards (Form S-71) (or if called something different

any time, all substantially similar documents) for Montana between 1970 and 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 36: Please produce a copy of all documents related to appointments or for deletions of elders or ministerial servants, including but not limited to Forms S-2, S-2a, S-2b, S-52a, S-52b, and S-303 (or if called something different at any time, all substantially similar documents), for the Jehovah's Witnesses' Hardin congregation from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 37: Please produce a copy of all documents related to appointments or for deletions of elders or ministerial servants, including but not limited to Forms S-2, S-2a, S-2b, S-52a, S-52b, and S-303 (or if called something different at any time, all substantially similar documents), for all the Montana Jehovah's Witnesses' congregations from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 38: Please produce a copy of all Forms M-2 and M-102 (or if called something different at any time, all substantially

similar documents) for the Jehovah's Witnesses' Hardin congregation from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 39: Please produce a copy of all Forms M-2 and M-102 (or if called something different at any time, all substantially similar documents) for all Montana Jehovah's Witnesses' congregations from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 40: Please produce a copy of all Form S-20 (or if called something different at any time, all substantially similar documents) for the Jehovah's Witnesses' Hardin congregation from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 41: Please produce a copy of all Form S-20 (or if called something different at any time, all substantially similar documents) for all Montana Jehovah's Witnesses' congregations from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 42: Please produce a copy of all Form S-72a (or if called something different at any time, all substantially similar documents) for the Jehovah's Witnesses' Hardin congregation from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 43: Please produce a copy of all Form S-72a (or if called something different at any time, all substantially similar documents) for all Montana Jehovah's Witnesses' congregations from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 44: Please produce a copy of all Forms S-18 (or if called something different at any time, all substantially similar documents) for the Jehovah's Witnesses' Hardin congregation from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 45: Please produce a copy of all Forms S-18 (or if called something different at any time, all substantially similar documents) for all Montana Jehovah's Witnesses' congregations from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 46: Please produce a copy of all documents related to disfellowship and disassociation, including but not limited to Forms S-80 and S-77 (or if called something different at any time, all substantially similar documents) for the Jehovah's Witnesses' Hardin congregation from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 47: Please produce a copy of all documents related to disfellowship and disassociation, including but not limited to Forms S-80 and S-77 (or if called something different at any time, all substantially similar documents) regarding members of any Jehovah's Witnesses' Montana congregations from 1970 to 1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 48: Please produce a copy of all Jehovah's Witnesses' Yearbooks (or if called something different at any time, all substantially similar documents) from 1970 to 1995.

RESPONSE: Responsive documents are being gathered and will be produced subject to resolution of issues relating to costs and format.

REQUEST FOR PRODUCTION NO. 49: Please produce a copy of all documents that related to Jehovah's Witnesses' pioneers serving in Montana from 1970 to 1995, including but not limited to Forms S-200, S-205, S-207, S-208, S-212, S-215, S-216, S-217, S-219, S-221a, and S-235 (or if called something different at any time, all substantially similar documents).

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 51 (sic): Please produce a copy of all Circuit Overseer Guidelines (or if called something different at any time, all substantially similar documents) that were provided to any circuit overseer serving the Jehovah's Witnesses' Hardin congregation at any time from 1970-1995.

RESPONSE: WTPA has no responsive documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 52: Please produce a copy of all versions of the Shepherding textbook (or if called something different at any time, all substantially similar documents) that were provided to any elder of the Jehovah's Witnesses' Hardin congregation at any time from 1970-1995.

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

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Please admit the authenticity of documents produced by Plaintiffs as Bates 001818-002081.

RESPONSE: WTPA has made reasonable inquiry, and the information it knows or can readily obtain is insufficient to enable it to admit or deny, as the copy submitted contains underlining and typing that may have been added by the possessor of the publication. Unless and until each of these modifications can be verified, it will not be possible for WTPA to admit or deny the authenticity of the documents.

REQUEST FOR ADMISSION NO. 2: Please admit that in 1977, WTPA served as the “parent corporate agency of Jehovah’s Witnesses.”

RESPONSE: Admit in part and deny in part. WTPA admits that it was the “parent corporate agency” in the sense that it was the oldest corporate entity associated with Jehovah’s Witnesses and is the copyright holder of Jehovah’s Witnesses’ most prized asset, the *New World Translation* of the Bible. WTPA denies that it is the legal “parent” of co-defendant WTNY.

REQUEST FOR ADMISSION NO. 3: Please admit that in 1977, Watchtower Bible and Tract Society of New York was a subsidiary of WTPA.

RESPONSE: Deny. WTNY has no corporate parent and is not a “legal” subsidiary of any other entity. In a religious sense it is secondary or supplemental to WTPA in that it provides publishing services to WTPA.

REQUEST FOR ADMISSION NO. 4: Please admit that in 1977 WTPA notified persons endeavoring to donate to the Jehovah’s Witness church to make their contributions payable to WTPA.

RESPONSE: Admit in part and deny in part. WTPA admits that it accepts voluntary donations in support of its religious activities but denies that it “notified” persons to donate to it in 1977.

REQUEST FOR ADMISSION NO. 5: Please admit the authenticity of documents produced by as Bates 002082-002256.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 6: Please admit that in 2003 WTPA notified persons endeavoring to donate to the Jehovah’s Witness church to make their contributions payable to WTPA.

RESPONSE: Admit in part and deny in part. WTPA admits that it accepts voluntary donations in support of its religious activities but denies that it “notified” persons to donate to it in 2003.

REQUEST FOR ADMISSION NO. 7: Please admit that for the period 1977 through 2003 WTPA notified persons endeavoring to donate to the Jehovah's Witness church to make their contributions payable to WTPA.

RESPONSE: *See Responses to Request for Admission Nos. 4 and 6.*

REQUEST FOR ADMISSION NO. 8: Please admit the authenticity of documents produced by Plaintiffs as Bates 000484-000623.

RESPONSE: WTPA has made reasonable inquiry, and the information it knows or can readily obtain is insufficient to enable it to admit or deny, as the copy submitted contains underlining, checks, brackets, and other marks apparently made by the possessor of the publication.

REQUEST FOR ADMISSION NO. 9: Please admit that you distributed documents produced by Plaintiffs as Bates 00484-000623 to the elders of Jehovah's Witnesses' congregations.

RESPONSE: Deny. WTPA did not distribute publications during that timeframe. As a copyright holder and occasional publisher, WTPA made publications available to elders.

REQUEST FOR ADMISSION NO. 10: Please admit that you distributed documents produced by Plaintiffs as Bates 000484-000623 to the elders of Jehovah's Witnesses' congregations in Montana.

RESPONSE: Deny. WTPA did not distribute publications during that timeframe. As a copyright holder and occasional publisher, WTPA made publications available to elders.

REQUEST FOR ADMISSION NO. 11: Please admit that you distributed documents produced by Plaintiffs as Bates 000484-000623 to the elders of the Jehovah's Witnesses' Hardin Congregation.

RESPONSE: Deny. WTPA did not distribute publications during that timeframe. As a copyright holder and occasional publisher, WTPA made publications available to elders.

REQUEST FOR ADMISSION NO. 12: Please admit that between 1970 and 1995, elders of the Jehovah's Witnesses' Hardin congregation were provided a copy of the Kingdom Ministry School Courses (or if called something different at any time, all substantially similar documents).

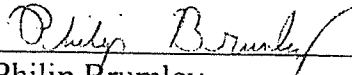
RESPONSE: WTPA has made reasonable inquiry, and the information it knows or can readily obtain is insufficient to enable it to admit or deny, as it does not know whether elders in the Hardin Congregation were provided a copy of the Kingdom Ministry School Course.

DATED this 20th day of November, 2020.

By: Jon A. Wilson
Guy W. Rogers / Jon A. Wilson /
Aaron M. Dunn
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*

VERIFICATION

Philip Brumley states that he has read the foregoing (*Defendant WTPA's Responses to Plaintiffs' First Set of Jurisdictional Discovery*) 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.


Philip Brumley

Dated: November 16, 2020

CERTIFICATE OF SERVICE

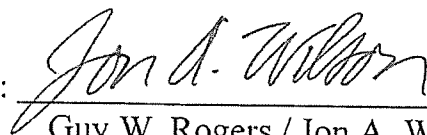
I hereby certify that, on November 20th, 2020, a copy of the foregoing
(Defendant WTPA's Responses to Plaintiffs' First Set of Jurisdictional Discovery)
was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
Missoula, MT 59802
3. Bruce G. Mapley Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

_____ CM/ECF	_____ Fax
_____ Hand Delivery	_____ E-Mail
<u>2-3</u> _____ U.S. Mail	_____ Overnight Delivery Services

By: _____



Guy W. Rogers / Jon A. Wilson /
Aaron M. Dunn

BROWN LAW FIRM, P.C.

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