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Attorneys for Plaintiffs

**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.,)
Cross Claimant,)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

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

**PRIVILEGE LOG RE: PLAINTIFF
TRACY CAEKAERT**

Parties to Communication	General Description	Claim of Privilege
Plaintiff Tracy Caekaert & Plaintiff's Counsel	Notes from Plaintiff to her counsel re: responses to WTNY's first set of discovery	Attorney-Client communication
Plaintiff's Counsel and Investigator Todd Bontecou	Notes and discussion re: Mr. Bontecou interviews with numerous witnesses in preparation of litigation and trial	Work Product
Plaintiff's Counsel and Mark O'Donnell	Multiple communications regarding the JW organization preparation for litigation and trial. All documents received have or will shortly be produced.	Work Product
Plaintiff's Counsel and Barbara Anderson	Multiple communications regarding the JW organization preparation for litigation and trial. All documents received have or will shortly be produced.	Work Product
Plaintiff Tracy Caekaert & Plaintiff's Counsel	Plaintiff's comments to her counsel re: text messages from Jodi Warnock, redacted from CAEKAERT/MAPLEY 4037	Attorney-Client communication

DATED this 9th day of March, 2022.

MEYER, SHAFFER & STEPANS PLLP

By: 

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CERTIFICATE OF SERVICE

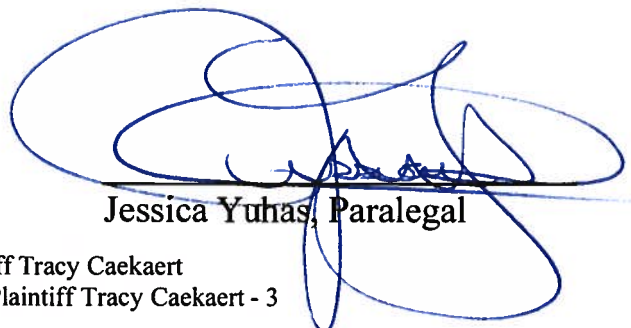
I hereby certify that on this 9th day of March 2022, a true and accurate copy of the foregoing was served on the following via email and U.S. Mail:

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**PRIVILEGE LOG RE: PLAINTIFF
CAMILLIA MAPLEY**

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.,)
Cross Claimant,)

BRUCE MAPLEY, SR.,)
Cross Defendant.)

Parties to Communication	General Description	Claim of Privilege
Plaintiff Camillia Mapley & Plaintiff's Counsel	Notes from Plaintiff to her counsel re: responses to WTNY's first set of discovery	Attorney-Client communication
Plaintiff's Counsel and Investigator Todd Bontecou	Notes and discussion re: Mr. Bontecou interviews with numerous witnesses in preparation of litigation and trial	Work Product
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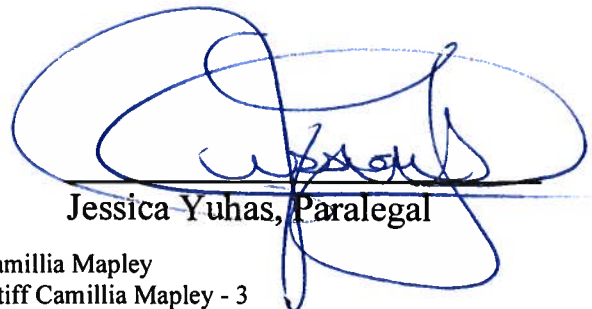
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