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Attorneys for Non-Party West Laurel Congregation

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.,
WATCHTOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA and
BRUCE MAPLEY, SR.,

Defendants.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.,

Cross Claimant,

vs.

BRUCE MAPLEY, SR.,

Cross Defendant.

Cause No. CV 20-52-BLG-SPW

**Affidavit of Marty Merrifield Re:
West Laurel Congregation's
Response to Subpoena Duces Tecum**

Marty Merrifield, being first duly sworn, states as follows:

1. I am an elder in the West Laurel Congregation of Jehovah's Witnesses in Laurel, Montana.
2. I hold the position of Coordinator Of The Body Of Elders.
3. I have reviewed the files maintained by the West Laurel Congregation in order to assist in compiling the Congregation's response to the Subpoena Duces Tecum it has received in this matter.
4. Based upon my review, the following is a true and accurate response to each topic contained within the Subpoena Duces Tecum to the best of my current knowledge, information and belief:

Topic 1: A copy of all documents in your possession evidencing communication to or from any overseer, including but not limited to district overseers, circuit overseers, and traveling overseers, related to abuse of minors in Montana between 1970 and 1995.

Response: The West Laurel Congregation has no responsive documents.

Topic 2: A copy of all documents in your possession relating to or referring to Camillia Mapley (including any other spelling of this name).

Response: The West Laurel Congregation has no responsive documents.

Topic 3: A copy of all documents in your possession relating to or referring to Tracy Caekaert (including any other spelling of this name).

Response: The West Laurel Congregation has no responsive documents.

Topic 4: A copy of all documents in your possession relating to or referring to Bruce Mapley Sr. (including any other spelling of this name).

Response: See attached Privileged Log.

Topic 5: A copy of all documents in your possession relating to or referring to Gunner Hain (including any other spelling of this name).

Response: The West Laurel Congregation has no responsive documents.

Topic 6: A copy of all documents in your possession authored by or referring to Brother Polakowski (including any other spelling of this name) that are related to abuse of minors in Montana between 1970 and 1995.

Response: The West Laurel Congregation has no responsive documents.

Topic 7: A copy of all documents in your possession authored by or referring to Brother Miller (including any other spelling of this name) that are related to abuse of minors in Montana between 1970 and 1995.

Response: The West Laurel Congregation has no responsive documents.

Topic 8: A copy of all documents in your possession authored by or referring to Brother Ross Finkbiner (including any other spelling of this name) that are related to abuse of minors in Montana between 1970 and 1995.

Response: The West Laurel Congregation has no responsive documents.

Topic 9: A copy of all documents in your possession relating to or referring to sexual abuse of minors in Montana between 1970 and 1995.

Response: The West Laurel Congregation has no responsive documents.

DATED this 26 day of May, 2022.

By: Marty Merrifield
Marty Merrifield

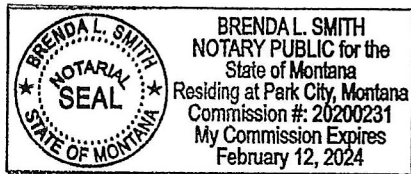
STATE OF MONTANA)

County of Yellowstone) : SS

On this 21st day of May, 2022, before me, the undersigned Notary Public for the State of Montana, personally appeared Marty Merrifield, known to me to be the person whose name is subscribed to the within instrument and acknowledge to me that he executed the same of his own free will.

IN WITNESS WHEREOF, I have set my hand and official the day and year first above written.

(Notary Seal)



Brenda L. Smith
Printed Name: Brenda L. Smith

PRIVILEGE LOG

Tracy Caekaert & Camilla Mapley v. Watchtower Bible & Tract Society of New York, e.al.

(Cause No. CV 20-52-BLG-SPW)

RESPONSE TO SUBPOENA DUCES TECUM OF WEST LAUREL CONGREGATION

| | Date | Title/Type | Basis for Withholding |
|----|-----------------------|---|------------------------------|
| 1. | August 1, 2012 | Letter from Mario F. Moreno, Associate General Counsel to West Laurel Congregation Body Of Elders "Re: Martin Svenson and Bruce Mapley, Sr." Specifically Marked "CONFIDENTIAL" | Attorney-Client Privilege |