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*Attorneys for Defendant 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.

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

Case No. CV-20-00052-SPW-TJC

**DEFENDANT  
WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA'S MOTION  
TO COMPEL  
RESPONSES BY  
CAMILLIA MAPLEY**

Cross-Claimants,

-vs-

BRUCE MAPLEY SR.,

Cross-Defendant.

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Co-Defendant Watchtower Bible and Tract Society of Pennsylvania (“WTPA”) respectfully requests that the Court compel Plaintiff Camillia Mapley to provide Responses to WTPA’s Requests for Production Nos. 10 and 36 and to Interrogatories Nos. 3,5, 6 & 7 that comply fully with the Rules of Civil Procedure. Plaintiff Mapley’s counsel have asserted objections that are improper and unsupported, and Plaintiff Mapley has not properly responded to these Requests.

WTPA certifies that the parties have conferred multiple times to attempt to resolve the dispute over Ms. Mapley’s Responses. The efforts to resolve the dispute are detailed in the accompanying Brief in Support. The discovery responses at issue are also attached to the Brief in Support.

**DATED** this 21<sup>st</sup> day of April, 2023.

MOULTON BELLINGHAM PC

By /s/ Gerry Fagan  
Gerry Fagan

*Attorneys for Watch Tower Bible and  
Tract Society of Pennsylvania*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of April, 2023, a copy of the foregoing was served on the following persons:

- 1. U.S. District Court, Billings Division
- 2. Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
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- 3. Jon A. Wilson  
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*Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.*  
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- 4. Bruce G. Mapley, Sr.  
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Birmingham, AL 35215

By the following means:

<u>1, 2, 3</u> CM/ECF	<u>        </u> Fax
<u>        </u> Hand Delivery	<u>        </u> E-Mail
<u>        </u> U.S. Mail	<u>        </u> Overnight Delivery Services
<u>  4  </u> Certified Mail, Return Receipt Requested	

By /s/ Gerry Fagan  
Gerry Fagan