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Via Email and U.S. Mail

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*Re: Caekaert & Mapley v. Watchtower Bible and Tract Society of New York, Inc., et al.
Rowland & Schulze v. Watchtower Bible and Tract Society of New York, Inc., et al.*

Dear Gerry,

Please find enclosed Plaintiffs' answers and responses to WTPA's Second Set of Combined Discovery.

You and I had conferred about Caekaert/Mapley RFP No. 36 / Rowland/Schulze RFP No. 34 because I was concerned that it was more of a fishing expedition for attorney work product than it was a request for documents that bear on a particular fact issue in our case. I did receive your follow-up email of 9/26/2022. However, that email does not identify any particular fact at issue that the RFP is seeking discoverable documents about. As a result, the concerns I expressed in my phone call have not been adequately addressed and we have objected to the RFP without producing the newspaper articles, magazine articles, internet articles, etc. that are related to child sex abuse perpetrated by members of religious organizations that are in my files. If WTPA cares to identify a specific fact at issue in the case that the RFP is seeking documents on, we would reconsider our position.

Sincerely,

MEYER, SHAFFER & STEPANS, PLLP

A handwritten signature in black ink, appearing to read 'Ryan R. Shaffer', with a long horizontal flourish extending to the right.

Ryan R. Shaffer