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**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

**PLAINTIFF CAMILLIA  
MAPLEY'S ANSWERS AND  
RESPONSES TO DEFENDANT  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA'S SECOND  
DISCOVERY REQUESTS TO  
PLAINTIFF CAMILLA MAPLEY**

**EXHIBIT 7**

**ANSWER:** *See* First Supp. Answer to WTNY's ROG Nos. 1–5.

**REQUEST FOR PRODUCTION NO. 34:** Please produce a copy of each and every document identified in or related to your answer to the Interrogatory immediately above.

**RESPONSE:** The only responsive documents may be found in the file for the Australian child custody proceeding pertaining to Plaintiff's son. Plaintiff's counsel does not believe that the entire contents of these documents are discoverable, though certain documents in the custody case file may be discoverable. As such, Plaintiff's counsel will make these documents available for inspection at our office in Missoula, MT, and counsel for the parties can then determine which documents WTPA believes should be produced.

**REQUEST FOR PRODUCTION NO. 35:** Please produce all physicians', doctors', psychiatrists', psychologists', counselors' or other healers' charts and records providing treatment to you for any physical or psychological condition for the past twenty (20) years.

**RESPONSE:** *See* Resp. to WTNY's RFP No. 3.

**REQUEST FOR PRODUCTION NO. 36:** Please produce any documents that you or your attorneys have received from any third parties relating to alleged child sexual abuse by, or claims against, religious entities and members of Jehovah's Witnesses, including but not limited to newspapers, magazines, books,

and/or internet articles. If you withhold any such responsive documents on the basis of privilege and/or work product, please identify the withheld documents in your Privilege Log pursuant to WTPA's Interrogatory No. 14.

**RESPONSE:** Objection, this request is not compliant with the scope of discovery as set forth in Fed. R. Civ. Pro. 26 (b) (1) because it does not seek evidence bearing on any fact in dispute in this case and is instead a fishing expedition for anything and everything in the files of Plaintiffs' attorneys related to child sex abuse and therefore appears to be more of an effort to learn what Plaintiffs' lawyers know about child sex abuse perpetrated by members of religious entities in general (i.e. attorney work product) rather than an effort to obtain information about any fact issue that is in dispute in this case. Plaintiffs' lawyers are not producing all of the newspaper articles, magazines articles, books, and internet articles pertaining to child sex abuse perpetrated by members of religious organizations that are in their possession because those documents do not bear on any disputed fact in this case and are therefore outside of the scope of discovery. Furthermore, identifying newspaper articles, magazine articles, books, and internet articles that Plaintiffs' lawyers have read to learn about child sex abuse perpetrated by members of religious entities would require disclosing attorney work product.

**REQUEST FOR ADMISSION NO. 2:** Please admit that you are not aware of any facts to establish that Mr. Svensen, Mr. Mapley Sr., or Mr. Haines

**CERTIFICATE OF OBJECTIONS**

I, Ryan R. Shaffer, hereby certify that I made each of the foregoing objections.

A handwritten signature in black ink, appearing to be 'R. Shaffer', written over a horizontal line.

Ryan R. Shaffer  
*Attorney for Plaintiff*