

Exhibit B

From: Ryan Shaffer
Sent: Tuesday, May 2, 2023 2:54 PM
To: Gerry.Fagan@moultonbellingham.com
Cc: Rob Stepans; James Murnion; Katy Gannon; Matthew Merrill; Jessica Yuhas
Subject: RE: Caekaert/Mapley - Letter re WTPA's Motion to Compel
Attachments: 2023-05-02 Stip re Relevancy (Draft).docx

Gerry,

As a follow up to my letter of today, please find attached a proposed stipulation regarding relevancy that comports with WTPA's position on RFPs 10 and 36. It seems to me that this should resolve our dispute over these RFPs. We would execute the same in the Rowland case. Assuming this is agreeable to WTPA, please coordinate with your colleagues at the Brown firm and we can circulate a final version for execution. We will then produce all of the documents in our firm's files that are relating to alleged child sexual abuse by, or claims against, religious entities and members of Jehovah's Witnesses.

I look forward to hearing from you by close of business Thursday on this.

Best,

Ryan R. Shaffer



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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

**STIPULATION REGARDING
RELEVANCY**

RECITALS

1. On May 11, 2022, Defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) served its first set of written discovery on Plaintiffs, including Requests for Production No. 10, which seeks production of:

[A]ll written or electronic information in your possession, custody, or control about alleged child sexual abuse by, or claims against, religious entities and members of Jehovah’s Witnesses . . .

2. In response, Plaintiff objected, stating:

Objection, vague, ambiguous, overbroad, and work product because it is not clear whether this RFP is seeking such material in the possession of Plaintiff’s lawyers. Objection, this RFP is not reasonably calculated to lead to the discovery of admissible evidence because it has nothing to do with any fact at issue in the case.

3. On August 9, 2022 WTPA served its second set of written discovery on Plaintiffs, including Request for Production No. 36, which seeks production of:

[A]ny documents that your 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 . . .

4. In response, Plaintiff objected, stating, *inter alia*:

Stipulation Regarding Relevancy

Caekaert and Mapley v. Watchtower Bible Tract of New York, Inc., et. al.

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 issues that is in dispute in this case.

5. On April 21, 2023 WTPA filed a Motion to Compel responses to RFPs 10 and 36.

STIPULATION

In order to resolve the Parties' dispute about RFPs 10 and 36, the Parties stipulate as follows:

1. Any and all documents and information relating to alleged child sexual abuse by, or claims against, religious entities and members of Jehovah's Witnesses are relevant to the claims and defenses in this case; and
2. The parties shall produce all documents and information in their respective possession, custody, and control relating to alleged child sexual abuse by, or claims against, religious entities and members of Jehovah's Witnesses.

Stipulation Regarding Relevancy

Caekaert and Mapley v. Watchtower Bible Tract of New York, Inc., et. al.

DATED this ____ day of _____, 2023.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs