

Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
Victoria K.M. Gannon  
Meyer, Shaffer & Stepan, PLLP  
430 Ryman Street  
Missoula, MT 59802  
Tel: (406) 543-6929  
Fax: (406) 721-1799  
rob@mss-lawfirm.com  
ryan@mss-lawfirm.com  
james@mss-lawfirm.com  
katy@mss-lawfirm.com

Matthew L. Merrill (appearing *pro hac vice*)  
Merrill Law, LLC  
6631 Mariposa Court  
Denver, CO 80221  
Tel: (303) 947-4453  
matthew@merrillwaterlaw.com

*Attorneys for Plaintiffs*

**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., and )  
WATCH TOWER BIBLE AND TRACT )  
SOCIETY OF PENNSYLVANIA., )  
)  
Defendants, )  
)

Case No. CV-20-52-BLG-SPW

**PLAINTIFFS' NOTICE OF  
FILING EXHIBITS**

Plaintiffs, Tracey Caekaert and Camillia Mapley, hereby submit this Notice of Filing Exhibits in Support of their Response Brief to Defendant WTNY's Motion for Protective Order (Doc. 234). Plaintiffs submit excerpts from the

Deposition of Allen Shuster, *Dorman and Gamboa v. Does 1-100, et al.* (Mar. 27, 2012) (No. 37-2010-92450-CU-PO-CTL) as Exhibit A and excerpts from the Deposition of Gary Breaux at 11, *Doe v. Watchtower* (May 29, 2015) (No. DC-14-12402) as Exhibit C. These transcripts were not filed with the response on June 1, 2023 (Doc. 243) as they had been marked by Defendant WTNY as “Confidential” pursuant to the Protective Order entered on January 26, 2022 (Docs. No. 110-1 and 111). WTNY has since granted Plaintiffs permission to file these transcript excerpts in the public record.

DATED this 2<sup>nd</sup> day of June, 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*