

EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

MICHAEL E. SPREADBURY,

Plaintiff,

v.

BITTERROOT PUBLIC LIBRARY,
CITY OF HAMILTON, LEE
ENTERPRISES, INC., and BOONE
KARLBERG P.C.,

Defendants.

Cause No. CV-11-064-M-DWM

DEFENDANT, LEE ENTERPRISES,
INC.'S FIRST SET OF WRITTEN
DISCOVERY REQUESTS TO
PLAINTIFF

COMES NOW Defendant, Lee Enterprises, Inc., and pursuant to Federal Rules of Civil Procedure 26, 33, and 36, hereby requests the Plaintiff to answer the following Interrogatory and Request for Admission in writing and under oath, within thirty (30) days after receipt thereof. Amended or supplemental answers to said Interrogatory and Request for Admission should be served and filed at any later date as required by Federal Rule of Civil Procedure 26(e).

1. REQUEST FOR ADMISSION NO. 1: Please admit the comments published with the September 10, 2009, article on the *Ravalli Republic* website, as alleged in your Second Amended Complaint (Dkt. No. 90) were made by third-party, on-line readers.

RESPONSE:

2. INTERROGATORY NO. 1: If your answer to the preceding Request for Admission is anything other than an unqualified admission, please list all of the facts and circumstances upon which you relied in denying the above Request for Admission.

RESPONSE:

DATED this 12th day of August, 2011.

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By Jeffrey B. Smith
Jeffrey B. Smith

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of August, 2011, a copy of the foregoing document was served on the following persons by the following means:

_____ CM/ECF
_____ Hand Delivery
1,2 _____ Mail
_____ Overnight Delivery Service
_____ Fax
_____ E-Mail

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/s/ Jeffrey B. Smith
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