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OCT 06 2011
CLERK, U.S. DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA

Pro Se Plaintiff

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

MICHAEL E. SPREADBURY) Cause No: cv-11-64-DWM-JCL
Plaintiff)
v.) LEAVE FILE
BITTERROOT PUBLIC LIBRARY,) MOTION FOR SANCTIONS
CITY OF HAMILTON,) PURJURY,
LEE ENTERPRISES, INC.,) FALSE SWEARING
BOONE KARLBERG, PC,)
_____)

Comes now Spreadbury requesting leave file motion for perjury, false swearing against Defendant Lee Enterprises PC (hereafter "Lee ") in the aforementioned.

Motion

In accordance with FRCP Rule 12(2) Spreadbury requesting leave to specify known misconduct by Defense Counsel Jeffrey B. Smith. Smith is attorney of

record for Lee Enterprises knowingly deceived this Honorable court as to material facts in the aforementioned to plead for summary judgment for Defendant Lee.

Smith knowingly violated FRCP Rule 11(b) in representations to court; specifically Rule 11(b)(1) improper purpose to mislead court as to lack of material facts by use of known false swearing and associated misrepresentation, Rule 11(b)(3) as Smith express factual contents in known false affidavit to support evidence of no material facts remaining and summary judgment in aforementioned.

FRCP Rule 11(b)(4) applies as a denial of the factual contractions are warranted, as information presented in Smith's September 27, 2001 foundational affidavit are not based upon sound evidence, but known falsities requiring law firm Garlington Lohn, and Robinson PLLP jointly held responsible for the act of associate Jeffrey B. Smith *esq.* Support for Smith's known false information in Spreadbury's October 6, 2011 affidavit served upon this Honorable Court.

Smith knowing made several false statements within his September 27, 2011 affidavit under sworn oath, and before a notary. These actions meet subsection 1 as statements are critically material to outcome of this case Montana Code Ann. MCA§ 45-7-201 [Perjury]. Smith's actions meet Montana Code Ann MCA§ 45-7-202 subsection 1, knowingly making false statement under oath, and under 1(c) for making such sworn statements before a notary.

Spreadbury will yield to honorable court to determine appropriate hearings, findings of facts on omissions and known falsities presented by Jeffrey B. Smith to this court in the form of sworn affidavit before a notary in the State of Montana.

Spreadbury asks that court receives this pleading in good faith that misconduct has occurred that is material to this case, knowingly and intentionally done to alter the outcome of the aforementioned. The court is further instructed to implement such sanction that is appropriate for Smith's violation, and interpret this pleading as liberally as needed to rectify the situation.

Respectfully submitted this 6th day of October, 2011

BY: _____


Michael E. Spreadbury, Self Represented Plaintiff