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*Attorneys for Defendants Bitterroot Public Library,
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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., BOONE
KARLBERG P.C., DR. ROBERT
BROPHY, TRISTA SMITH, NANSU
RODDY, JERRY STEELE, STEVE
SNAVELY, STEVEN BRUNER-
MURPHY, RYAN OSTER,
KENNETH S. BELL, and JENNIFER
LINT,

Defendants.

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

**CITY DEFENDANTS' MOTION
TO FILE UNDER SEAL**

Pursuant to Local Rule 1.8(b), United States District Court, District of Montana, Defendants Bitterroot Public Library, Dr. Robert Brophy, Trista Smith, Nansu Roddy, City of Hamilton, Jerry Steele, Steve Snavely, Steven Bruner-Murphy, Ryan Oster, Kenneth S. Bell and Jennifer B. Lint (collectively, "City Defendants") move the Court for its Order allowing the filing of the City Defendants' Statement of Undisputed Facts under seal. The referenced document will support the City Defendants' Motions for Summary Judgment.

The Order is necessary because the City Defendants' Statement of Undisputed Facts refers to and attaches a number of police reports, which are confidential criminal justice information. The City Defendants have attempted to reach an agreement on a protective order, but Plaintiff refuses to stipulate.

Counsel for Defendant Lee Enterprises was contacted with respect to this motion and does not object. The undersigned attempted to contact Spreadbury, but he has yet to respond. Based upon his past refusal to agree to a protective order, it is believed that Spreadbury objects. A brief in support of this motion is filed concurrently herewith.

DATED this 11th day of October, 2011.

/s/Thomas J. Leonard
Thomas J. Leonard
BOONE KARLBERG P.C.
Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.

CERTIFICATE OF SERVICE

I hereby certify that, on the 11th day of October, 2011, a copy of the foregoing document was served on the following persons by the following means:

 1 CM/ECF

 Hand Delivery

 2 Mail

 Overnight Delivery Service

 Fax

 E-Mail

1. Clerk, U.S. District Court
2. Michael E. Spreadbury
700 South Fourth Street
Hamilton, MT 59840

/s/ Thomas J. Leonard

Thomas J. Leonard

BOONE KARLBERG P.C.

*Attorneys for Defendants Bitterroot Public
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