

# BOONE KARLBERG P.C.

ATTORNEYS AT LAW

October 24, 2011

FEMA  
 Denver Federal Center  
 Building 710, Box 25267  
 Denver, CO 80225-0267

Re: *Michael E. Spreadbury v. Bitterroot Public Library, et al.*

To Whom It May Concern:

W.T. BOONE (1910-1984)  
 KARL R. KARLBERG (1923-1988)  
 JAMES J. BENN (1944-1992)  
 THOMAS H. BOONE  
 WILLIAM L. CROWLEY  
 RANDY J. COX  
 ROBERT J. SULLIVAN  
 DEAN A. STENSLAND  
 CYNTHIA K. THILL  
 ROSS D. TILLMAN  
 JAMES A. BOWDITCH  
 MATTHEW B. HAYHURST  
 SCOTT M. STEARNS  
 NATASHA PRINZING JONES  
 THOMAS J. LEONARD  
 JULIE R. SIRRS  
 TRACEY NEIGHBOR JOHNSON

This office represents Defendants Bitterroot Public Library, City of Hamilton, Dr. Robert Brophy, Trista Smith, Nansu Roddy, Jerry Steele, Steve Snavely, Steven Bruner-Murphy, Ryan Oster, Kenneth S. Bell and Jennifer Lint in the above-referenced lawsuit filed by Michael E. Spreadbury. It is necessary for us to obtain records relating to Michael E. Spreadbury. Enclosed is a Subpoena Duces Tecum that has been issued pursuant to the Federal Rules of Civil Procedure. As stated in the Subpoena, you are required to produce the following:

Any and all documents or tangible things, including but not limited to the entire employee or personnel file, relating to Michael E. Spreadbury. Mr. Spreadbury's date of birth is November 30, [REDACTED]; his social security number is [REDACTED]. This request includes any and all documents related to Mr. Spreadbury's employment and/or contractual relationship with FEMA in your possession or control, including but not limited to employee/contractor job descriptions, applications and application materials, reviews, evaluations, personnel records, disciplinary action/proceeding records, letters of termination or separation, worker's compensation files, time records, payroll records, job restrictions, etc.

Please complete and sign the enclosed Acknowledgment, and mail it to me along with the requested documents no later than **November 3, 2011**. Our office will pay copying and reasonable administrative costs associated with providing the documents.

Thank you for your cooperation. Please do not hesitate to call if you have any questions.

Sincerely,



Thomas J. Leonard

TJL:seh  
 Encs.

c: Michael E. Spreadbury (w/encs.)

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