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Attorneys for City Defendants

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

AFFIDAVIT OF JERRY STEELE

State of Montana)
 :SS
County of Missoula)

Jerry Steele, having first been duly sworn upon oath, deposes and says:

1. I am the Mayor of the City of Hamilton. This affidavit is based on my personal knowledge. I would be competent to testify to the facts set forth herein if required to do so.

2. I recall a conversation in my office with Lorraine Crotty and Dick White. It is my belief these individuals are friends or acquaintances of Plaintiff Michael Spreadbury.

3. To the best of my recollection, Crotty and White had come to my office to discuss a proposed agreement between the Hamilton Police Department and County Sheriff.

4. At some point, the conversation turned to Spreadbury. Crotty and/or White commented that they had observed Spreadbury during a court hearing and that he handled himself well.

5. To the best of my recollection, I commented that, in my experience, Spreadbury's behavior is inconsistent, and that sometimes "he acts like a schizophrenic."

6. I have no personal knowledge regarding Spreadbury's medical or emotional condition, and it was not my intention to imply or suggest I had any such knowledge, or to comment on Spreadbury's medical or emotional condition.

7. I was merely expressing an opinion about Spreadbury's inconsistent behavior, based upon my personal experience.

8. I have no reason to believe, nor did Crotty or White suggest to me, that my comments were taken in any other way.

9. Besides Crotty and White, there were no other witnesses to this private conversation.

10. I have not made similar comments regarding Spreadbury to anyone else.

11. Further affiant sayeth naught.

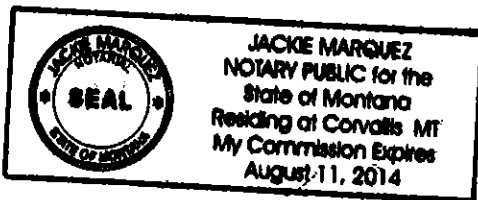
DATED this 12 day of October, 2011.




Jerry Steele

SUBSCRIBED AND SWORN TO before me this 12 day of October, 2011,

by Jerry Steele.




Printed Name: Jackie Marquez
Notary Public for the State of Montana
Residing at Convalis, Montana
My commission expires: 8/11/14