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*Attorneys for Defendants Bitterroot Public Library,
 City of Hamilton and Boone Karlberg P.C.*

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 KENNETH BELL'S
 FIRST INTERROGATORIES TO
 PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Kenneth Bell ("Bell") requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or statements of Bell which you allege violated your federal rights, and with regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements of Bell which you allege violated your state constitutional rights, and for each such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Bell conspired to deprive you of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Bell conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:

INTERROGATORY NO. 4: Identify the Court and Cause No. of those criminal actions against you in which you allege probable cause was missing as alleged in paragraph 28 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 5: Identify the Court and Cause No. of those judicial proceedings which you allege to be malicious prosecution as alleged in Count 7 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 6: Describe those policies or customs, if any, of Bell which you allege violated your state or federal rights as alleged in Count 9 of the Amended Complaint.

ANSWER:

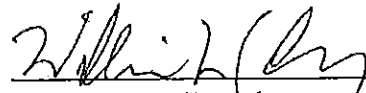
INTERROGATORY NO. 7: Identify those acts, omissions or statements of Bell which you allege to be negligence as alleged in Count 11 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 8: Identify those acts or omissions of Bell which you allege to be intentional or negligent infliction of emotional distress as alleged in Counts 20 and 21 of your Amended Complaint.

ANSWER:

DATED this 29th day of April, 2011.



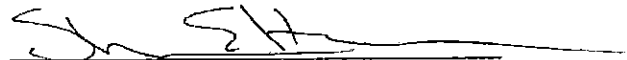
William L. Crowley
BOONE KARLBERG P.C.
*Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.*

CERTIFICATE OF SERVICE

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Michael E. Spreadbury
700 South Fourth Street
Hamilton, MT 59840

BOONE KARLBERG P.C.



Paralegal

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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 STEVEN BRUNER-
MURPHY'S FIRST
INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Steven Bruner-Murphy ("Murphy") requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or statements of Murphy which you allege violated your federal rights, and with regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements of Murphy which you allege violated your state constitutional rights, and for each such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Murphy conspired to deprive you of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Murphy conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:


INTERROGATORY NO. 4: Identify those acts or omissions of Murphy which you allege to be negligence as alleged in Count 13 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 5: Identify those acts or omissions of Murphy which you allege violated your rights as alleged in Count 14 of the Amended Complaint.

ANSWER:

DATED this 29th day of April, 2011.



William L. Crowley
BOONE KARLBERG P.C.
Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.

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Hamilton, MT 59840

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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., and BOONE
KARLBERG P.C.

Defendants.

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

**DEFENDANT CITY OF
HAMILTON'S FIRST
INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant City of Hamilton ("City") requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Identify and describe those policies, customs or practices of the City which you allege violated your federal rights, and for each such policy, custom or practice, please answer the following:

- a. Identify those federal rights which you allege were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such policies, customs or practices, and for each such person, state what knowledge or information he or she possesses.
- c. Identify those writings or documents, in whatever form, which relate to such policies, customs or practices and a violation of your federal rights.

ANSWER:

INTERROGATORY NO. 2: Identify those state constitutional rights which you allege a representative of the City violated, and for each such state constitutional right, describe how your right was violated.

ANSWER:

INTERROGATORY NO. 3: Describe the severe economic loss alleged in paragraph 78 of your Amended Complaint, and with regard to such alleged loss, please answer the following:

- a. State the names and addresses of those people with knowledge or information concerning such alleged loss.
- b. Identify those writings or documents, in whatever form, which relate to or concern such alleged loss.

ANSWER:

INTERROGATORY NO. 4: Describe the injury to Plaintiff's capacity to pursue an established course of life as alleged in paragraph 81 of the Amended Complaint, and with regard to such alleged injury, please answer the following:

- a. State the names and current addresses of those people with knowledge or information concerning such alleged injury.
- b. Identify those writings or documents, in whatever form, which relate to or concern such alleged injury.

ANSWER:

INTERROGATORY NO. 5: Describe the acts or omissions of each Defendant which you allege to be tortious interference with prospective economic advantage as alleged in Count 8 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 6: Describe the damage to prospective economic advantage as alleged in Count 8 of the Amended Complaint, and with regard to such alleged damage, please answer the following:

- a. State the names and current addresses of those people with knowledge or information concerning such alleged damage.
- b. Identify those writings or documents, in whatever form, which relate to or concern such alleged damage.

ANSWER:

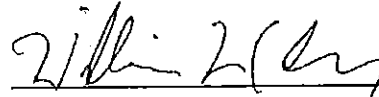
INTERROGATORY NO. 7: Identify those statements or publications of a representative of the City which you allege to be defamation as alleged in Count 17 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 8: Please identify those acts or omissions of a representative of the City which you allege to be negligent or intentional infliction of emotional distress as alleged in Counts 20 and 21 of your Amended Complaint.

ANSWER:

DATED this 29th day of April, 2011.



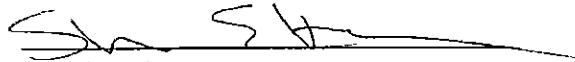
William L. Crowley
BOONE KARLBERG P.C.
Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.

CERTIFICATE OF SERVICE

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Hamilton, MT 59840

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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., and BOONE
KARLBERG P.C.

Defendants.

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

**DEFENDANT BITTERROOT
PUBLIC LIBRARY'S FIRST
INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Bitterroot Public Library (“Library”) requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Identify and describe those policies, customs or practices of the Library which you allege violated your federal rights, and for each such policy, custom or practice, please answer the following:

- a. Identify those federal rights which you allege were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such policies, customs or practices, and for each such person, state what knowledge or information he or she possesses.
- c. Identify those writings or documents, in whatever form, which relate to such policies, customs or practices and a violation of your federal rights.

ANSWER:

INTERROGATORY NO. 2: State the names of those representatives of the Library whom you allege have damaged or injured you, and for each such person, please answer the following:

- a. Identify the acts or omissions of the representative alleged to have damaged or injured.
- b. State the names and addresses of those people with knowledge or information concerning such acts or omissions.
- c. Identify those documents, in whatever form, which address such acts or omissions.

ANSWER:

INTERROGATORY NO. 3: Describe the injury to your character as alleged in paragraphs 78 and 82 of the Amended Complaint, and with regard to such alleged injury, please answer the following:

- a. State the names and current addresses of those people with knowledge or information concerning such alleged injuries.
- b. Identify those writings or documents, in whatever form, which relate to or concern such alleged injury.

ANSWER:

INTERROGATORY NO. 4: Describe the alleged emotional distress alleged in paragraphs 79, 80, 81, 82 and 85 and Counts 20 and 21 of your Amended Complaint, and with regard to such alleged emotional distress, please answer the following:

a. State the names and addresses of those people with knowledge or information concerning such alleged emotional distress.

b. Identify those writings or documents, in whatever form, which relate to or concern such alleged emotional distress.

ANSWER:

INTERROGATORY NO. 5: Describe those facts you allege support the liability of the Library for an award of punitive damages to you.

ANSWER:

INTERROGATORY NO. 6: Identify the names and addresses of those healthcare professionals, including counselors, who have examined, counseled or treated you for alleged bodily injury or emotional distress caused by one or more of the Defendants.

ANSWER:

INTERROGATORY NO. 7: State the names and current addresses of the last four medical doctors seen by you.

ANSWER:

DATED this 29th day of April, 2011.




William L. Crowley
BOONE KARLBERG P.C.
*Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.*

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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 JENNIFER LINT
FIRST INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Jennifer Lint (“Lint”) requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or statements of Lint which you allege violated your federal rights, and with regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements of Lint which you allege violated your state constitutional rights, and for each such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Lint conspired to deprive you of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Lint conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:

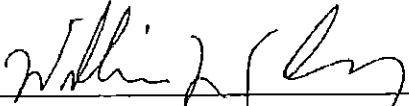
INTERROGATORY NO. 4: Identify those acts, omissions or statements of Lint which you allege to be negligence as alleged in Count 11 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 5: Identify those acts or omissions of Lint which you allege to be intentional or negligent infliction of emotional distress as alleged in Counts 20 and 21 of your Amended Complaint.

ANSWER:

DATED this 29th day of April, 2011.



William L. Crowley
BOONE KARLBERG P.C.
Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.

CERTIFICATE OF SERVICE

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Hamilton, MT 59840

BOONE KARLBERG P.C.



Paralegal

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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., and BOONE
KARLBERG P.C.

Defendants.

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

**DEFENDANT RYAN OSTER'S
FIRST INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Ryan Oster (“Oster”) requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or statements of Oster which you allege violated your federal rights, and with regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements of Oster which you allege violated your state constitutional rights, and for each such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Oster conspired to deprive you of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Oster conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:


INTERROGATORY NO. 4: Identify those policies or customs of the City or Oster which you allege violated your rights as alleged in Count 10 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 5: Identify the nature and amount of those items of compensatory damages which you seek against the Defendants in this action.

ANSWER:

DATED this 29th day of April, 2011.



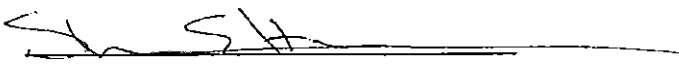
William L. Crowley
BOONE KARLBERG P.C.
*Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.*

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Hamilton, MT 59840

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*Attorneys for Defendants Bitterroot Public Library,
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IN THE UNITED STATES DISTRICT COURT
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MICHAEL E. SPREADBURY,

Plaintiff,

v.

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CITY OF HAMILTON, LEE
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KARLBERG P.C.

Defendants.

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

**DEFENDANT NANSU RODDY'S
FIRST INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Nansu Roddy (“Roddy”) requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or statements of Roddy which you allege violated your federal rights, and with regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements of Roddy which you allege violated your state constitutional rights, and for each such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Roddy conspired to deprive Plaintiff of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Smith is alleged to have conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:

INTERROGATORY NO. 4: Describe those First Amendment rights which you allege Roddy or other representatives of the Library or the City violated as alleged in Count 6 of the Complaint.

ANSWER:

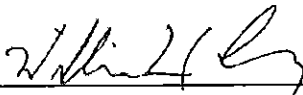
INTERROGATORY NO. 5: Please identify those acts or omissions of Roddy or any other representative of the Library or the City which you allege violated your First Amendment rights as alleged in Count 6 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 6: Please identify those acts or omissions of Roddy which you allege to be negligent or intentional infliction of emotional distress as alleged in Counts 20 and 21 of the Amended Complaint.

ANSWER:

DATED this 29th day of April, 2011.



William L. Crowley
BOONE KARLBERG P.C.
Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.

CERTIFICATE OF SERVICE

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Michael E. Spreadbury
700 South Fourth Street
Hamilton, MT 59840

BOONE KARLBERG P.C.

A handwritten signature in black ink, appearing to read 'Boone Karlberg', is written over a horizontal line.

Paralegal

William L. Crowley
Natasha Prinzing Jones
Thomas J. Leonard
BOONE KARLBERG P.C.
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tleonard@boonekarlberg.com

*Attorneys for Defendants Bitterroot Public Library,
City of Hamilton and Boone Karlberg P.C.*

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 TRISTA SMITH'S
FIRST INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Trista Smith ("Smith") requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or statements of Smith which you allege violated your federal rights, and with regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements of Smith which you allege violated your state constitutional rights, and for each such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Smith conspired to deprive Plaintiff of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Smith is alleged to have conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:

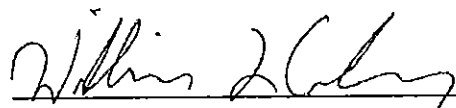
INTERROGATORY NO. 4: State the names and current addresses of those expert witnesses, if any, whom you expect to testify on your behalf at trial, and with regard to such expert witnesses, please answer the following:

a. State the subject matter upon which the expert is expected to testify.

- b. Identify those opinions to which the expert is expected to testify.
- c. Provide the basis of each opinion to which the expert is expected to testify.

ANSWER:

DATED this 29th day of April, 2011.



William L. Crowley
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 29th day of April, 2011, a copy of the foregoing document was served on the following persons by the following by U.S. Mail:

Michael E. Spreadbury
700 South Fourth Street
Hamilton, MT 59840

BOONE KARLBERG P.C.



Paralegal

William L. Crowley
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KARLBERG P.C.

Defendants.

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

**DEFENDANT STEVE SNAVELY'S
FIRST INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton,
Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Steve Snavely
("Snavely") requests Plaintiff to answer each of the Interrogatories below within
30 days from the time they are served upon him. The answers are to be
supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or
statements of Snavely which you allege violated your federal rights, and with
regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with
knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate
to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements
of Snavely which you allege violated your state constitutional rights, and for each
such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Snavelly conspired to deprive you of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Snavelly conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:

INTERROGATORY NO. 4: Describe the damage to your reputation as alleged in Count 8 of the Amended Complaint.

ANSWER:

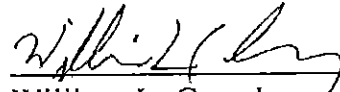
INTERROGATORY NO. 5: Identify those acts or omissions of Snavely which you allege to be negligence as alleged in Count 12 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 6: Describe your work or employment history for the past ten years, including the names and addresses of your employers, the dates of your employment, and your job position and duties (whether such employment was full-time or part-time or paid or unpaid).

ANSWER:

DATED this 29th day of April, 2011.




William L. Crowley
BOONE KARLBERG P.C.
Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.

CERTIFICATE OF SERVICE

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700 South Fourth Street
Hamilton, MT 59840

BOONE KARLBERG P.C.


Paralegal

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*Attorneys for Defendants Bitterroot Public Library,
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IN THE UNITED STATES DISTRICT COURT
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KARLBERG P.C.

Defendants.

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

**DEFENDANT JERRY STEELE'S
FIRST INTERROGATORIES TO
PLAINTIFF**

TO: Plaintiff Michael E. Spreadbury, 700 South Fourth Street, Hamilton, Montana 59840:

In accordance with Rule 33, Fed. R. Civ. P., Defendant Jerry Steele (“Steele”) requests Plaintiff to answer each of the Interrogatories below within 30 days from the time they are served upon him. The answers are to be supplemented, if necessary, as provided in Rule 26(e), Fed. R. Civ. P.

INTERROGATORY NO. 1: Please identify those acts, omissions or statements of Steele which you allege violated your federal rights, and with regard to such acts, omissions or statements, please answer the following:

- a. Identify those federal rights which were violated.
- b. State the names and current addresses of those people with knowledge or information concerning such alleged violations.
- c. Identify those writings or documents, in whatever form, which relate to or concern such alleged violations.

ANSWER:

INTERROGATORY NO. 2: Identify those acts, omissions or statements of Steele which you allege violated your state constitutional rights, and for each such act, omission or statement, please answer the following:

- a. Identify those state constitutional rights you allege were violated.

b. State the names and current addresses of those people with knowledge or information concerning such violations.

c. Identify those writings or documents, in whatever form, which relate to or concern such violations.

ANSWER:

INTERROGATORY NO. 3: Identify those facts that you allege support an allegation, if any, that Steele conspired to deprive you of federal or state rights, and with regard to such conspiracy, please answer the following:

a. Identify the names and current addresses of those people with whom Steele conspired.

b. State the names and current addresses of those people with knowledge or information concerning such alleged conspiracy.

c. Identify those writings or documents, in whatever form, which relate to or concern such alleged conspiracy.

ANSWER:

INTERROGATORY NO. 4: Identify those statements or publications of a representative of the City of Hamilton which you allege to be defamation as alleged in Count 17 of the Amended Complaint.

ANSWER:

INTERROGATORY NO. 5: Please describe your educational history, including any school you attended, the dates attended and your course of study, along with any degree or certification obtained by you.

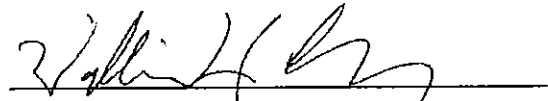
ANSWER:

INTERROGATORY NO. 6: Describe the injury to your lifestyle as alleged in paragraph 81 of the Amended Complaint, and with regard to such injury, please answer the following:

- a. State the names and addresses of those people with knowledge or information concerning such alleged injury.
- b. Identify those writings or documents, in whatever form, which relate to or concern such alleged injury.

ANSWER:

DATED this 29th day of April, 2011.

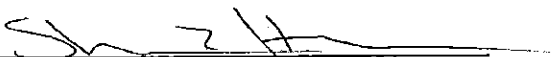

William L. Crowley
BOONE KARLBERG P.C.
*Attorneys for Defendants
Bitterroot Public Library, City of
Hamilton and Boone Karlberg P.C.*

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Michael E. Spreadbury
700 South Fourth Street
Hamilton, MT 59840

BOONE KARLBERG P.C.



Paralegal