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To: Mr. William L. Crowley
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Pages: 1 pg cover, and

Set I, II of Interrogatories: 18 pgs.

Subject: Bitterroot Public Library

Date: September 13, 2011

Urgent

For Review

Reply

Comments:

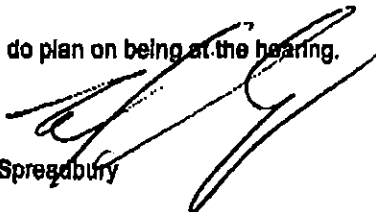
Dear Mr. Crowley,

Enclosed are two sets (of three) of Interrogatories in the Library Case.

The third set will be sent tomorrow morning (City, Brophy)

Please indicate if I forgot a question, there were quite a few.

I do plan on being at the hearing.



Michael Spreadbury

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Pro Se Plaintiff

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

Cause No: CV-11-64-DWM-JCL

MICHAEL E. SPREADBURY)
 Plaintiff)
 v.)
 BITTERROOT PUBLIC LIBRARY,)
 CITY OF HAMILTON,)
 LEE ENTERPRISES INC.,)
 BOONE KARLBERG PC,)
 Defendants)

PLAINTIFF ANSWERS
DEFENSE
INTERROGATORIES

I

Comes now Plaintiff with answer to Defense Interrogatories under protest. Under threat of improper sanction, Plaintiff answers interrogatories although Defense actors have not pled for functional analysis for immunity before this court.

Bitterroot Public Library Interrogatory:

Plaintiff Answer to Interrogatories

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Interrogatory No. 1

Policy, custom or practice of Bitterroot Public Library which you allege violated your federal rights.

The Bitterroot public library violated Spreadbury's right to free speech, peaceful assembly on public property, and procedural due process for federal claims. Any Bar licensed lawyer (2950 in Montana) could identify these claims, for addresses see Montana Bar Association Helena, Montana. The Bitterroot Public Library policies in 2009, the associated American Library Association (ALA) policies adopted by the Bitterroot Public Library, as well as the request for reconsideration form from the Bitterroot Public Library all support Plaintiff Claims. Montana Code Ann. 22-1-311 (Privileges) were violated [which invokes Procedural Due Process Claim] due to never asking Plaintiff to leave library. The combination of statute violation and deprivation of right (due process, peaceful assembly) makes for stigma-plus test in US District Court. Public library interfered with an election by charging Plaintiff with trespassing on public property meeting public function test for US District Court. Peaceful assembly, free speech is protected in Amendment 1 US Constitution, Procedural Due Process is protected in Amendment 14 US Constitution. Plaintiff reserves right to amend.

Interrogatory No. 2

Plaintiff Answer to Interrogatories

Cause CV-11-64-DWM-JCL

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Nansu Roddy 2nd Amended Complaint ¶32, ¶120-123 violated free speech.

Dr. Robert Brophy 2nd Amended Complaint ¶42, 57, 65, 82, 84, 85; procedural due process ¶105-110; negligence ¶95-100; abuse of process ¶101-104; malicious prosecution ¶124-130 tortious interference ¶131-139; IIED ¶198-202; NIED 203-208

Bitterroot Public Library policy in 2009, MCA 22-1-311 (Library Privileges), US & MT Constitution [established rights] describes how public library staff has injured Plaintiff [non-adherence to]. Public Library staff knew or should have known BPL policy, Montana Code Ann.;306 State St. Hamilton MT 59840.

Plaintiff reserves right to amend.

Interrogatory No. 3.

Injury with respect to Intentional Infliction of emotional distress does not have to have physical or psychological parameters. The standard in Montana is depriving a right of Plaintiff, with significant impact on Plaintiff. Imputing Plaintiff committed crime by peaceful assembly on public property, and publishing information to world audience, interfering with election, causes severe emotional distress. Court documents and case precedent in the State of Montana: Johnson v. Supersave (1984); Stensvad v. Towe ('88); Gibson v. Western Fire Ins. Co ('84).

Plaintiff Answer to Interrogatories

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No proof of injury to plead IIED, NIED cases in Montana.

Spreadbury's Brief in support dated 6-10-10 for Spreadbury v. Wetzsteon et. al. details IIED case history precedent in Montana.

Plaintiff reserves right to amend.

Interrogatory No. 5

Punitive Damages against Library.

2nd Amended Complaint ¶234-238; count 26—Punitive Damages.

Library staff acted in malice to remove library privileges of Plaintiff without cause, charge Plaintiff with crime for peaceful assembly on public property. Library staff had callous disregard for Plaintiff right to equal protection, punitive damages are to stop future behavior under 42 USC §1983.

Interrogatory No. 6

No physical or psychological damage needs to be monitored, or evaluated to effect IIED, NIED in the State of Montana per Johnson v. Supersave (1984). This question is further protected by Federal Privacy Law 5 USC §552(a). Plaintiff has properly pled prima facie case for IIED, NIED in aforementioned.

Plaintiff Answer to Interrogatories

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Interrogatory No. 7

Medical Information is privacy protected under 5 USC §552(a). Information sought is irrelevant to the case; main focus is peaceful assembly on public property *inter alia*.

Nansu Roddy Interrogatory

Interrogatory #1

Defendant Nansu Roddy violated Plaintiff right to equal protection protected in 14th Amendment US Constitution: American Library Policy (which is Public Library policy in 2009). Right to free speech, petition government protection protected in Amendment 1 US Constitution.

Plaintiff reserves right to amend.

Interrogatory #2

Defendant Roddy violated Plaintiff right to Individual Dignity Art. II s.4 with respect to due process of the law. Defendant Roddy violated Plaintiff state right to Art. II s. 7 freedom of speech, publish. All Montana Licensed lawyers (2949) should have understanding of these rights. See Montana Bar Assn. for addresses.

Plaintiff Answer to Interrogatories

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Interrogatory #3

Defendant Roddy named as a defendant for deprivation of right, is employed with former director, Board member, Public Library called law enforcement. Defendant Roddy claimed to be a witness, or was reported to be a witness to the protected act of peaceful assembly on m property at 306 State St. Hamilton Montana Aug. 20, 2009 via Defendant City of Hamilton Police Report dated Nov. 4, 2009.

No response to "request for reconsideration form" July 8, 2009 indicate abuse/neglect of procedure by actors in color of law from Public Library [civil conspiracy to deprive Plaintiff protected right at Public Library].

Interrogatory #4

Public Library adopts ALA policy of "right to read". Defendant Roddy, Defendant Director did not allow publication into library. Disallowing written work into library violates requestor right to speech, free expression, and written grievance to government (since Library is joint actor with City of Hamilton).

Interrogatory #5

As indicated in Hamilton Police report dated 11/5/2009 Defendant Director claimed speech of Plaintiff "harassment". Public Library staff attempted to criminalize free speech of Plaintiff. Spreadbury seeking return of property rejected

Plaintiff Answer to Interrogatories

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by Defendant Roddy. The speech associated with the return of property, is not a crime. Defendant Public Library violated Spreadbury's right to protect property, free speech.

Interrogatory #6

As a Defense actor knowingly, or unknowingly deprives a protected right of Plaintiff, and has significant impact on Plaintiff, liability arises. To disallow a written work in a library which meets policy criteria of the library, it deprives Plaintiff right to speak. To have a law enforcement agency call and indicate procession of written work after being accused of criminal trespass by same law enforcement agency causes significant emotional distress in anyone. Same law enforcement would not uphold Montana law MCA-22-1-311(library privileges) for Plaintiff. It was emotionally distressful for Plaintiff to have any interaction with Defendant Hamilton law enforcement due to equal protection violation in joint function with other defendants in this case.

HPD Snavelly**Interrogatory No. 1**

Plaintiff Answer to Interrogatories

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Accusing Plaintiff of crime of criminal trespass as peacefully assembled on public property; protected Amendment 1, US Constitution. Defendant Snavelly knew or should have known public park, even land near public library, supported by public funds is public property. Further, Defendant Snavelly as senior officer of Defendant City of Hamilton Police knew or should have known that land was owned, or controlling interest by the City of Hamilton, and therefore public property, and precluded from charge of criminal trespass on Plaintiff. Defendant Snavel did not extend equal protection Amendment 14 US Constitution to Plaintiff, and acted in callous disregard to Plaintiff's protected rights with respect to the Public Library. Case precedent, US Constitution sources.

Interrogatory No. 2

In accusing Plaintiff criminal trespass as peacefully assembled on public property Snavelly knew or should have know was depriving Plaintiff right to 1st Amendment US Constution. As Snaveley spoke to plaintiff on video capture in HPD station, request for false information to police denied violating 14th amendment right to equal protection of the laws. Peaceful assembly is Art. II s. 6 MT Constitution, equal protection is within Art. II. s.4 MT Constitution.

Interrogatory No. 3

Plaintiff Answer to Interrogatories

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Defendant Snavelly worked with the Public Library to deprive rights due to not stopping the library from criminal trespass, obtained, arranged property of Plaintiff to be stored at Defendant City. Defendant Snavelly knew or should have known that public property was precluded as criminal trespass. Snavelly is a defendant for the city of Hamilton who conspired with Defendant Library, Defendant Newspaper, and Defendant Law Firm to deprive, or defame Spreadbury as indicated as goals of Defense actors in 2nd Amended complaint ¶25-29.las

Interrogatory No. 4

Plaintiff has lost friends due to reporting of crime of peaceful assembly. Plaintiff has been disabled to not understanding the malice involved in charging crime for protected activity. Job interviews get hung up upon "criminality" of Plaintiff who has never committed a crime in Montana. m interfered with election which caused immediate, future economic damage. Permanent family relationships severed due to not understanding charge, need to return to Hamilton for charge protected in US Constitution. Is there a monetary value to enjoyment of life, family, or enjoyment of work and profession with an intact reputation for not committing crime with respect to Defendants imputing crime in aforementioned?

Interrogatory No. 5

Plaintiff Answer to Interrogatories

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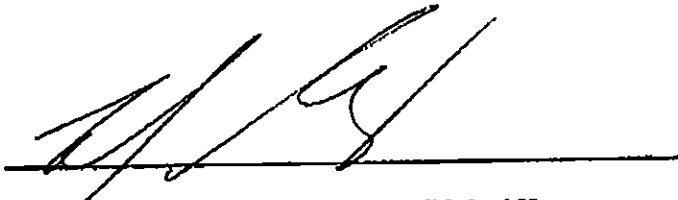
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Defendant Snavelly did not know that land associated with a public library, and owned by his employer, Defendant City of Hamilton was PUBLIC property. Plaintiff told Defendant Snavelly within initial interaction that property was public property, obviously on deaf ears of Defendant City of Hamilton actors.

Interrogatory No 6

I am not applying for a position, I am redressing injury caused by Defendants including Defendant Law Firm Boone Karlberg. Information is irrelevant to this case: if the Defense can establish relevancy with respect to sitting on public property I will discover the information.

Respectfully submitted this 13 day of September, 2011



Michael E. Spreadbury, Pro Se Plaintiff

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

Cause No: CV-11-64-DWM-JCL

MICHAEL E. SPREADBURY)	
Plaintiff)	
v.)	PLAINTIFF ANSWERS
BITTERROOT PUBLIC LIBRARY,)	DEFENSE
CITY OF HAMILTON,)	INTERROGATORIES
LEE ENTERPRISES INC.,)	
BOONE KARLBERG PC,)	
Defendants)	II

Comes now Plaintiff with answer to Defense Interrogatories under protest. Under threat of improper sanction, Plaintiff answers interrogatories although Defense actors have not pled for functional analysis for immunity before this court.

Defendant Steve Murphy Interrogatory:

Plaintiff Answer to Interrogatories

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Interrogatory No. 1

Defendant Detective Steve Murphy did investigate, and send up a report to Defendant Bell for "stalking" an actual crime MCA 45-5-220 in Montana for Plaintiff claiming a sighting of Defendant Langstaff. As it turns out, a ploy was set up putting a "Gloria" public library name tag on an unknown person. Criminal Police report, open to public inspection dated 5/29/09. Defendant Langstaff attempts to impute crime of protected speech in Hamilton Amendment 1 US Constitution. Defendant Murphy knew should have known writing a "sighting" of a person is not a crime, deprived Spreadbury equal protection 14 Amendment, US Constitution, Art. II s. 4 MT Constitution.

Interrogatory No. 2

Free o in form of protected free speech within opinion of blog/website Art. II s. 7 . Equal protection Art. II s. 4. HPD report which includes Plaintiff address, phone, social security number 209 CR0001281.

Interrogatory No. 3.

It is stated directly in the Police report that Defendant Langstaff came in the police station. Detective Murphy did not uphold Plaintiff right to equal protection, Due process Art. II s. 4,17 MT Constitution. Defendants conspired to deprive Plaintiff right as stated in 2nd Amended Complaint.

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Interrogatory No. 4

Detective Murphy knew or should have known that writing on a website of a sighting of any person is a protected right, and not stalking. Plaintiff was standing outside Library distributing campaign materials to patrons when woman with Gloria badge walked out of librry. Plaintiff was reporting truth. Detective Murphy knew or should have known that information from Spreadbury would have refuted criminal allegation, even though not a crime. Murphy,was negligent in not contacting Spreadbury, and not knowing activity was not a crime.

Other reports cleared without any action needed due to no crime see other interrogatory. Murphy acted with malice against Spreadbury, to publish report, impute crime when protected activity of free speech Amendment 1 US Constitution, Art. II s. 7 MT Constutution.

Interrogatory No. 5

See prior interrogatories. It's still a protected activity of free speech to write on a website or blog; its protected opinion, not fact.

Ryan Oster Interrogatories

Interrogatory No. 1

Plaintiff Answer to Interrogatories

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Defendant Chief Ryan Oster denied right to liberty protected in amendment 5, 14 US Constitution by making policy or custom to not enter a storefront in Hamilton, Montana without cause. Employees and former employee John Cramer, Plaintiff have information as to business conducted, handwritten note requesting the cessation of defamation of Plaintiff. Hand written note in pleadings of July 9, 2009 affirm lengthy time in waiting area, no disturbance to business.

Interrogatory No. 2

See Interrogatory #1

Interrogatory #3

No threats were made, business was conducted at Defendant Lee (classified ad was sold, Plaintiff looked up startled by transaction.

Interrogatory #4

As Police chief, Defendant Oster decisions made in color of law make policy or custom for the Hamilton Police Department.

Interrogatory #5

Compensatory damages against Defendants are consistent with court precedent for IIED, NIED cases in Montana, and §1983 cases previously tried.

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Ken Bell Interrogatory

Interrogatory #1

Defendant Ken Bell knew or should have known peaceful assembly on public property is protected amendment 1 US Constitution. This statement deprives Defendant Bell any qualified immunity due to a deprivation of right.

Interrogatory #2

Defendant Bell violated Art. II s. 6 MT Constitution. Bell also deprived Plaintiff MCA 2-1-311 privilege to enter library due to never being asked to leave library by anyone including law enforcement. Plaintiff cannot willfully violate the rules if never asked to leave by Defendants. Bell violated due process Art. II s4 Montana Constitution title is Individual dignity.

Interrogatory #3

Defendant Bell made sworn statement to City Court allege crime of peaceful assembly of Plaintiff. Bell prosecuted Plaintiff for peaceful assembly on public property.

Interrogatory #4

Charge of criminal trespass abridged Plaintiff right to peaceful assembly, and therefore did not have any cause, probable or otherwise.

Plaintiff Answer to Interrogatories

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Interrogatory #5

1) Hamilton City Court CR-2009-53; Judge Reardon presiding, Defendant Bell prosecuting.

2) District Court as DC-10-26 Judge Larson presiding, Defendant Lint prosecuting

Interrogatory #6

Defendant Bell is policymaker as Dept. Head in City of Hamilton, can speak on behalf of city in court. Bell made official policy or custom for prosecuting criminal trespass for protected activity of peaceful assembly Amend. 1 US Constitution by prosecuting Plaintiff.

Interrogatory #7

Defendant Bell was negligent by prosecuting Plaintiff for peaceful assembly on public property; Bell knew or should have known property belonged to City of Hamilton. Deprivation of Plaintiff established right cause for NIED, IIED.

Bell knew of should have known NCIC database search for non-crime of peaceful assembly is felony, defames and interferes with economic future of Plaintiff.

Bell knew or should have known that Plaintiff right to equal protection violated by prosecuting Plaintiff for protected activity of peaceful assembly.

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Interrogatory #8

The deprivation of Plaintiffs right to peaceful assembly which caused significant impact to plaintiff due to conspiracy with other defendants to publish information statewide, countrywide, worldwide actionable for NIED, IIED.

Defendant Lint

Interrogatory No. 1

Defendant Lint prosecuted Plaintiff in State Court for peaceful assembly on public property, a protected right Amendment 1 US Constitution. Defendant Lint published a brief criminalizing peaceful assembly of Plaintiff.

Interrogatory No. 2

Defendant Lint prosecuted Plaintiff in violation of Art. II s. 4,6,17. Plaintiff deprived due process, peaceful assembly, and equal protection of the laws.

Interrogatory No. 3

Defendant City of Hamilton which Defendant Lint was actor, conspired with Defendant Library to charge Plaintiff in violation of Amendment 1 US Constitution, Defendant Newspaper, Defendant Boone Karlberg conspired to defame Plaintiff with Defendants to this case.

Plaintiff Answer to Interrogatories

Cause CV-11-64-DWM-JCL

September 13, 2011

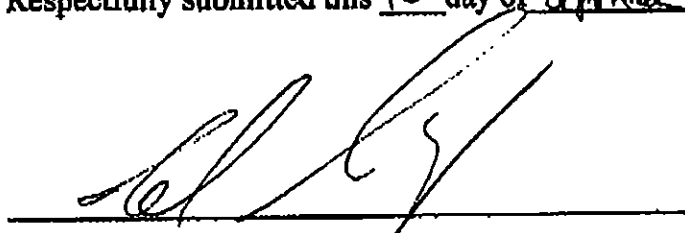
Interrogatory No. 4

Defendant Lint knew or should have known that parcel at NE Cor. S4th St. and State St. at Defendant Public Library is public property, and criminal trespass unlawful to cite, prosecute against Plaintiff.

Interrogatory No. 5

The deprivation of Plaintiff right to peaceful assembly by Defendant Lint caused significant impact on Plaintiff due to international press coverage, loss of reputation, and defamation per se comments about protected activity of peaceful assembly. Defendant Lint knew or should have known that prosecuting Plaintiff would deprive right to assemble peacefully protected amendment 1 US constitution, Art. II s. 6 Montana Constitution.

Respectfully submitted this 13 day of September, 2011



Michael E. Spreadbury, Pro Se Plaintiff