

Michael E. Spreadbury
700 S. 4th Street
Hamilton, MT 59840
Telephone: (406) 363-3877
mspread@hotmail.com
Pro Se Plaintiff

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

MICHAEL E. SPREADBURY) Cause No: CV-11-64-DWM-JCL
Plaintiff)
v.) PLAINTIFF FIRST
BITTERROOT PUBLIC LIBRARY,) INTERROGATORIES,
CITY OF HAMILTON,) WRITTEN DISCOVERY
LEE ENTERPRISES, INC.,) REQUESTS TO DEFENDNT
BOONE KARLBERG, PC,) BOONE KARLBERG PC
_____)

Comes now Spreadbury with first set of interrogatories for Defendant Boone Karlberg PC. In compliance with Rule 33, FRCP, Plaintiff asks Defendant City of Hamilton to answer each interrogatory within 30 days. Any supplemental answers per FRCP 26(e) should be served and filed at a later date.

REQUEST FOR ADMISSION No. 1: Please admit receipt of public funds from Montana Municipal Interlocal Authority for litigation expenses for Defendant Bitterroot Public Library although ineligible applicant for Municipal coverage via Montana Code Ann. MCA§ 22-1-611; Defendant City arranged coverage in conspiracy to deprive Plaintiff rights in furtherance of a municipal fraud.

Response:

REQUEST FOR PRODUCTION No. 1: Please produce any law review document, case citation, or controlling lawful authority that states peaceful assembly on public property as Plaintiff effected August 20, 2009 at the Bitterroot Public Library commons is a crime of trespassing in the State of Montana.

Response:

REQUEST FOR ADMISSION No. 2: Please admit Defendant Boone imputed crime of trespass on public property citing Plaintiff as perpetrator in several pleadings before Montana Courts, including the Montana Supreme Court.

Response:

REQUEST FOR PRODUCTION No. 2: Please produce contract for litigation services between Montana Municipal Interlocal Authority (MMIA) and the City of Hamilton, Bitterroot Public Library.

Response:

INTERROGATORY No. 1: Identify reason Defendant Boone disclosed and distributed Plaintiff 's full Social Security Number (SSN) to several states outside Montana in invalid subpoena request for protected, confidential Plaintiff education and work history information per federal statutes for privacy, education privacy; Boone continued with invalid, unlawful subpoena request for confidential health information in Montana with pretext of valid, court issued subpoena for protected information in furtherance of a public fraud.

Response:

REQUEST FOR PRODUCTION No. 3: Produce all billable costs, copy costs, and total cost to defend the Bitterroot Public Library from service of summons to current date; within aforementioned case for 42 USC§ 1983.

Response:

INTERROGATORY No. 2: Identify reasons Boone sought, argued in oral argument September 14, 2011, and gained financial sanctions against IFP status Plaintiff in this cause for 42 USC§1983.

Response:

REQUEST FOR ADMISSION No. 3 : Please admit who disclosed Plaintiff full social security number (SSN) to Defendant Boone Karlberg PC.

Response:

REQUEST FOR ADMISSION No. 4: Please admit Defendant Boone sought protected, and confidential information of Plaintiff from several sources; unlawful per federal statutes, well established in all professional practice.

Response:

REQUEST FOR PRODUCTION NO. 4: Please produce Boone Karlberg PC mission statement, founding document, guidance principles for juris prudence to clients, parties to law cases, Boone code of ethics, standards of conduct.

Response:

INTERROGATORY No. 3: Identify what information Defendant Boone possessed to publish Plaintiff imposition of federal crime of impersonating a federal agent, specifically a FBI agent.

Response:

INTERROGATORY No. 6: Identify reason Defendant Boone published in court pleading a known false statement of Plaintiff threat to Defendant Bell.

Response:

REQUEST FOR PRODUCTION No. 5 : Please produce information that Plaintiff made actual, communicated threat to Ken Bell, an imposition of a crime.

Response:

INTERROGATORY No. 7 : Why did Boone Karlberg PC publish, republish on several occasions the imposition of crime of trespass in several pleadings before Montana Courts the protected activity of peaceful assembly of Plaintiff August 20, 2009 on the public property of the Bitterroot Public Library.

Response:

Submitted this 21st day of November, 2011

BY: _____

Michael E. Spreadbury, Self Represented Plaintiff