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*Attorneys for City and Library 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-JCL

**CITY AND LIBRARY  
DEFENDANTS' MOTION *IN  
LIMINE***

In accordance with the Federal Rules of Evidence, the City and Library Defendants request the Court to exclude any evidence, testimony, opinions or argument at trial concerning the following matters:

1. Motion *in Limine* No. 1: Alleged misconduct by Boone attorneys;
2. Motion *in Limine* No. 2: Alleged public fraud and references to the Montana Municipal Interlocal Authority and its providing a defense and indemnity;
3. Motion *in Limine* No. 3: Plaintiff's alleged ostracism in Hamilton, Montana;
4. Motion *in Limine* No. 4: The Defendants caused Plaintiff to lose the Mayoral election;
5. Motion *in Limine* No. 5: Alleged bad acts of Defendants unrelated to Plaintiff;
6. Motion *in Limine* No. 6: Alleged corruption, cover-up or code of silence;
7. Motion *in Limine* No. 7: Plaintiff's opinions; and
8. Motion *in Limine* No. 8: Claims already decided against Plaintiff.

Allowing evidence, testimony, opinions or argument concerning each of the above matters would undermine the integrity and fairness of the trial. This motion is supported by a brief filed concurrently herewith. Plaintiff has not responded to

the request made on the morning of January 31, 2012, concerning whether he opposes the motion *in limine*. However, Plaintiff's filings in this action strongly indicate that he opposes the motion *in limine*.

DATED this 1<sup>st</sup> day of February, 2012.

/s/ William L. Crowley  
William L. Crowley  
BOONE KARLBERG P.C.  
*Attorneys for City and Library Defendants*

CERTIFICATE OF SERVICE

I hereby certify that, on the 1<sup>st</sup> day of February, 2012, a copy of the foregoing document was served on the following persons by the following means:

- 1, 3      CM/ECF
- \_\_\_\_\_      Hand Delivery
- 2        Mail
- \_\_\_\_\_      Overnight Delivery Service
- \_\_\_\_\_      Fax
- \_\_\_\_\_      E-Mail

1.      Clerk, U.S. District Court
2.      Michael E. Spreadbury  
         700 South Fourth Street  
         Hamilton, MT 59840
3.      Jeffrey B. Smith  
         Garlington, Lohn & Robinson, PLLP  
         350 Ryman Street  
         P.O. Box 7909  
         Missoula, MT 59807-7909

/s/ William L. Crowley  
William L. Crowley  
BOONE KARLBERG P.C.  
*Attorneys for City and Library Defendants*