

William L. Crowley
Natasha Prinzing Jones
Thomas J. Leonard
BOONE KARLBERG P.C.
201 West Main, Suite 300
P.O. Box 9199
Missoula, MT 59807-9199
Telephone: (406)543-6646
Facsimile: (406) 549-6804
bcrowley@boonekarlberg.com
npjones@boonekarlberg.com
tleonard@boonekarlberg.com

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 FOR
LEAVE TO FILE REPLY BRIEF
AND EXHIBITS UNDER SEAL**

In accordance with the Court's Protective Order (Doc. 189, pp. 9-10), the City and Library Defendants move the Court for leave to file their motion *in limine* reply brief and exhibits under seal. Good cause supports this motion. The reply brief and exhibits refer to Plaintiff's confidential mental health and social security records which are to be filed under seal in accordance with the Court's Protective Order. Further, Plaintiff has not responded to the request on February 6, 2012, concerning his position on this motion. Given his stated position concerning the use of and reference to his mental health and social security records, it is believed he opposes the motion.

DATED this 8th 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 8th 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