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Pro Se Plaintiff



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

MICHAEL E. SPREADBURY	) Cause No: CV-11-064-DWM-JCL	
Plaintiff	)	
v.	)	NOTICE OF PLAINTIFF
BITTERROOT PUBLIC LIBRARY,	)	INTERROGATORIES,
CITY OF HAMILTON,	)	DISCOVERY REQUESTS
LEE ENTERPRISES, INC.,	)	2 <sup>nd</sup> TO LEE
BOONE KARLBERG, PC,	)	
	)	
Comes now Spreadbury with judicial not	tice of i	nterrogatories served upon
Defendants in this cause of action before	this Ho	onorable Court:
Interrogatory No. 19: Describe how Lee in Montana or elsewhere; what websites internet access.		<del>-</del>
Answer:		

Interrogatory No. 20: If the product Lee develops in Montana is printed newspapers or news source websites, how are the Defendants anything but newspaper publishers, and providers of news information?

# Answer:

Interrogatory No. 21: What is the fact checking protocol for editors at Lee for articles published by Defendants?

# Answer:

Interrogatory No. 22: What is the fact checking protocol for reporters prior to publishing an Lee Enterprises news article?

## Answer:

Interrogatory No. 23: Does Lee Enterprises have the capability to edit online comments published on Defendant Lee websites?

# Answer:

Interrogatory No. 24: Within the August 9, 2010 Ravalli Republic article why did no personnel from Lee discover the false fact of conviction for disturbing the peace against Plaintiff?

### Answer:

Interrogatory No. 25: In the attempt at correction published August 24, 2010, why did the text indicate a correction to an August 9, 2010 article with information from August 10, 2010, and other false information?

# Answer:

Respectfully submitted this 23 day of February, 2012

BA

Michael E. Spreadbury, Self Represented Plaintiff