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FILED
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By PATRICK E. DUFFY, CLERK
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Pro Se Plaintiff

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

MICHAEL E. SPREADBURY) Cause 9:11cv-11-64-DWM-JCL
Plaintiff)
v.)
BITTERROOT PUBLIC LIBRARY,) RESPONSE TO
CITY OF HAMILTON,) LEE DAMAGE EXPERT
LEE ENTERPRISES, INC.,) DISCLOSURE
BOONE KARLBERG, PC,)
_____)

Comes now Spreadbury with reply to Defendant Lee Enterprises Inc. with respect to disclosing confidential information, projected false information.

Honorable Court is given notice of release of confidential information, speculative information that is incorrect under pretense of expert witness testimony.

Neither Boone Karlberg PC nor Lee Enterprises has not contacted “expert witness” or damage expert witness, but merely recopied information from confidential health information, part of which is merely speculative on the part of the Defense.

Honorable Court has previously said Plaintiff asked for the release of protected health information, under investigation for release, not releasable by Subpoena Deuces Tecum as a source of protected health informational.

Court is reminded of Count 23 Injunctive Relief (Doc. #10) Lee Enterprises Inc.

“to stop malicious comment, defamatory material from publication”

Spreadbury has served upon court affidavit that Health Care provider rejected any personality disorder in individual health conference; Lee projects new condition of “Narcissistic Disorder” never discussed or published as a diagnosed condition for Spreadbury. This is a false and defamatory statement by Lee published with malice without court privilege due to malice.

Lee continues to publish false information as Dr. Wahlberg was not Spreadbury’s treatment clinician, and only had an insight due to aggressive answers from Spreadbury on a multiple choice test in 2006, not verified by any clinician.

Proof of future harm is before this court, as pled (Ln. 216-222 Doc. #10) in 2nd Amended Complaint.

Difficulty with employment is also due to defendants intimidating employers as in Defendant City Police, layoffs from work, and employers ending business, not solely medical condition.

The difference between maintaining employment and being disabled is the nexus of this case as the proximate cause was the treatment of Plaintiff, extreme use of articles, online comments, and the lack of proof that Lee Enterprises can offer online real-time discussion forums, or have online access through Lee sites. Court has erred in allowing Communications Decency Act to Lee, actionable upon appeal.

Lee discredits itself as false pretence of contact with medical personnel, no contracts, or independent experts provided. As “troubled” Plaintiff, counters two law firms, graduates from two collegiate programs, engages in stressful employment of teaching, disaster work, Lee argument is discredited.

Plaintiff was fully capable until unreasonable actions by Defendants without due care. Unless Defendants can obtain testimony that the sole direction of Plaintiff future was disability, liability attaches.

Questionable ethics apply to GLR, LEE. Publishing false information is nexus of this case, and request for court intervention.

If Plaintiff was actually Narcissistic it would be sending thank you cards to Lee Enterprises for the 30-35 headlines and comments. The employment as teacher to help hundreds of kids would not have happened either.

As Lee counsel can claim the #113 and #145 ranked law school it is not a good idea to speculate or publish false information in the pretext of reality. The case is for the defamation, negligence, and tortious interference due to publishing a false conviction.

Ability to work compared to fully disabled means severe emotional distress occurred, and it shows the professionalism to continue that injury before this court.

Respectfully submitted this ^{2nd} day of April, 2012

BY: _____

Michael E. Spreadbury, Self Represented Plaintiff

Certificate of Service

Cause No. 9:11-cv-11-0064-DWM-JCL

I certify as Plaintiff in this action, a copy of the below named pleading was served upon the US District Court Missoula Division and all opposing counsel for parties in this above named cause of action by first class mail. The following addresses were used for service:

Response to Lee Damage Expert Disclosure

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Dated 4/2/12



Michael E. Spreadbury, Pro Se Plaintiff