

EXHIBIT A

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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., and BOONE  
KARLBERG P.C.,

Defendants.

Cause No. CV-11-064-M-DWM

AFFIDAVIT OF PERRY BACKUS  
(Newsworthy)

STATE OF MONTANA           )  
  : ss  
County of Missoula           )

I, Perry Backus, being duly sworn and under oath, state as follows:

1. I was editor of the *Ravalli Republic* on August 9, 2010, and a reporter for a number of years.

2. The August 9, 2010, article about Mr. Spreadbury reported facts from separate hearings in two different courts held on August 6, 2010, in causes of action brought by Michael Spreadbury.

3. The two hearings were covered by the newspaper because Michael Spreadbury had become newsworthy through his numerous attention-getting activities, public protests, and confrontations. Mr. Spreadbury had both created and involved himself in many public controversies at this time, and a number of articles had been written about his activities.

4. These controversies began before the August 6, 2010, hearings.

5. These controversies included, but were not limited to:

- a. A 2006 dispute with a neighbor in which Mr. Spreadbury alleged the neighbor was a public nuisance;
- b. Attempt to recall Ravalli County Attorney, George Corn;
- c. Attempt to recall Ravalli County Sheriff, Chris Hoffman;
- d. Complaints against the Hamilton Police Department;
- e. Complaints against the local government;
- f. Complaints about the Rocky Mountain Labs;
- g. Dispute with the Bitterroot Library;
- h. Dispute with the City of Hamilton;

- i. Various lawsuits filed against public servants involving public matters; and
- j. Various incidents of public protest or confrontations in public locations.

6. With these events, Mr. Spreadbury continually kept himself in the forefront of local news, both before and after the August 9, 2010 article.

7. The August 9, 2010, article and subsequent articles were written to report on issues of public interest that Mr. Spreadbury had deliberately created or interjected himself into.

Further Affiant sayeth not.

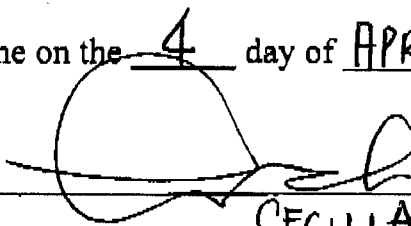
I declare under penalty of perjury that the foregoing is true and correct.

DATED this 4 day of April, 2012.



Perry Backus

Signed and sworn to before me on the 4 day of APRIL, 2012, by  
Perry Backus.



CECILIA CHAN

(Type or print name)

NOTARY PUBLIC FOR THE STATE OF MONTANA ~~CALIFORNIA~~  
Residing at SAN FRANCISCO, MONTANA ~~CALIFORNIA~~  
My commission expires: 11.25.2012

