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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

DEFENDANT LEE ENTERPRISES,  
 INC.'S MOTIONS IN LIMINE

COMES NOW Defendant, Lee Enterprises, Inc. (“Lee Enterprises” or “Lee”), through its counsel, Garlington, Lohn & Robinson, PLLP, and respectfully brings these Motions in Limine to exclude any evidence, testimony, opinions or argument at trial concerning the following matters.

1. Motion in Limine No. 1: Portrayal of Lee Enterprises and Appeal to

Local Bias;

2. Motion in Limine No. 2: Failure to Call Witnesses;
3. Motion in Limine No. 3: Conduct of Discovery;
4. Motion in Limine No. 4: Golden Rule Argument;
5. Motion in Limine No. 5: Exclusion of Comments on Pretrial Motions;
6. Motion in Limine No. 6: Plaintiff's Closing Argument;
7. Motion in Limine No. 7: Order of Witnesses;
8. Motion in Limine No. 8: Statements Made By Unavailable Witnesses;
9. Motion in Limine No. 9: Liability Insurance;
10. Motion in Limine No. 10: Matters Already Decided;
11. Motion in Limine No. 11: Other Articles Not At Issue;
12. Motion in Limine No. 12: Plaintiff's Opinion Testimony;
13. Motion in Limine No. 13: Speculative Statements Unsupported By

Evidence;

14. Motion in Limine No. 14: Unrelated Complaints and Character

Attacks; and

15. Motion in Limine No. 15: Expert Testimony.

These Motions are supported by the brief filed concurrently. Lee has attempted to contact Plaintiff to determine whether he opposes these motions. Although Plaintiff did not respond, based on prior filings, Lee assumes Plaintiff

opposes these motions.

DATED this 11th day of April, 2012.

/s/ Jeffrey B. Smith

Attorneys for Defendant, Lee Enterprises, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of April, 2012, a copy of the foregoing document was served on the following persons by the following means:

  2   CM/ECF  
       Hand Delivery  
  1   Mail  
       Overnight Delivery Service  
       Fax  
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/s/ Jeffrey B. Smith  
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