

Bill Crowley

From: Bill Crowley
Sent: Monday, May 07, 2012 10:08 AM
To: 'mspread@hotmail.com'
Cc: Crystal Trenary; Kate Palmer; Kandy Jenkins; Shannon Holdsambeck; Tasha Jones; Thomas Leonard; Tina Sunderland
Subject: FW: SENT ON BEHALF OF WILLIAM L. CROWLEY - Spreadbury v. Bitterroot Public Library

We disagree with the assertions in your email below. In any event, they are immaterial to moving the matter, including the pretrial order, forward. The only two portions of the pretrial order which we need to work together on are the Nature Of The Action and the Agreed Facts. If you don't agree with something that is stated, it gets removed. Also, you can propose something different. If we don't agree with it, it is not included. You can draft your own "Plaintiff's Contentions". Those do not require agreement by the opposing party. They are included as drafted by you. Next, if you disagree with what is listed as Plaintiff's trial time, just advise what length of time you expect for Plaintiff's case. That will go in the pretrial statement. Further, you can identify whatever legal issues you believe exist, and those will be added to the pretrial order. You are correct that the FINAL pretrial order is not due until May 31, 2012. However, custom and practice (and the scheduling order) require the parties to work on it in advance of May 31. Consequently, please provide us with a list of your contentions and your exhibit, discovery and witness lists, if any. We will add those to the pretrial order. In addition, please advise whatever modifications to Nature of the Action, Agreed facts, Plaintiff's trial time and Legal issues which you propose. If you are not going to do these things, please advise so we can notify the Court. As to your phone call, I would appreciate it if you would direct any phone calls to myself or my Partners, Tasha Jones or Tom Leonard. My paralegal, Shannon, works very hard and is top-notch. She is a very fine woman. She doesn't deserve to be spoken to in the way in which you spoke to her.

From: Shannon Holdsambeck
Sent: Monday, May 07, 2012 9:15 AM
To: Bill Crowley
Subject: FW: SENT ON BEHALF OF WILLIAM L. CROWLEY - Spreadbury v. Bitterroot Public Library

From: Michael Spreadbury [mailto:mspread@hotmail.com]
Sent: Monday, May 07, 2012 8:46 AM
To: Shannon Holdsambeck
Cc: saltlakecity@ic.fbi.gov; askdoj@usdoj.gov
Subject: RE: SENT ON BEHALF OF WILLIAM L. CROWLEY - Spreadbury v. Bitterroot Public Library

Dear Mr. Crowley,

The Pretrial information is not due until May 31, 2012. While I fully understand you feel reshaping the information, and rules dont apply to you committing fraud in Missoula Montana representing both an entity that does not exist, and a non-municipal entity such as the Hamilton Library with public funds, the US Department of Justice feels there is a large problem here as do I.

I disagree with the pretrial order and feel it is silly to think getting away with fraud is acceptable.

Michael Spreadbury


Banned from the Bitterroot Public Library
<http://wethepeoplemt.blogspot.com/2012/03/bitterroot-public-library-hamilton.html>

Steve Bullock's bid on the Montana Governor 2012 is UP IN SMOKE
<http://www.montanaattorneygeneral.com/2012/04/up-in-smoke-steve-bullock-for-governor.html>

From: sholdsambeck@boonekarlberg.com
To: mspread@hotmail.com
CC: BCrowley@boonekarlberg.com; npjones@boonekarlberg.com; tleonard@boonekarlberg.com;
kpalmmer@boonekarlberg.com
Date: Thu, 3 May 2012 11:02:16 -0600
Subject: SENT ON BEHALF OF WILLIAM L. CROWLEY - Spreadbury v. Bitterroot Public Library

In accordance with the Court's Scheduling Order and the Local Rules, attached is a proposed Pretrial Order in *Spreadbury v. City of Hamilton and Bitterroot Public Library*, Cause No. CV-11-064-M-DWM. We tried to state facts in the sections for the nature of the action and the agreed facts without characterization. Please provide your contentions, exhibit lists, discovery lists and witness lists. We will insert them in the Pretrial Order. If you have other concerns with the proposed Pretrial Order, please let us know. Also, we will get you copies of our exhibit, discovery and witness lists when they are finalized.

Sincerely,

William L. Crowley
c/o Shannon E. Holdsambeck
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