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*Attorneys for Defendants Bitterroot Public Library,
City of Hamilton and Boone Karlberg P.C.*

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 WILLIAM L.
CROWLEY**

STATE OF MONTANA)
 : ss.
County of Missoula)

William L. Crowley, being first duly sworn upon his oath, states as follows:

1. I am one of the shareholders in Boone Karlberg P.C. I have personal knowledge of the matters stated in this affidavit.


2. The allegations in Mr. Spreadbury's Complaint relating to the City of Hamilton and its employees and the Bitterroot Public Library and its employees were reviewed by MMIA's underwriting committee and its general counsel. Likewise, MMIA is aware of Mr. Spreadbury's "public fraud" allegations.

3. MMIA determined that a defense was available for at least a portion of Mr. Spreadbury's allegations relating to the City of Hamilton and its employees and the Bitterroot Public Library and its employees. Based on the allegations, MMIA reserved its rights to apply certain exclusions, including but not limited to, alleged intentional conduct and actions outside the course and scope of employment.

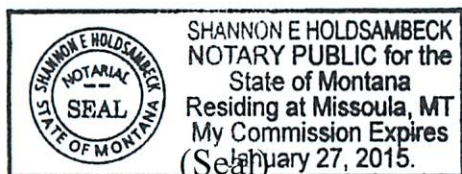
4. Having made the above determinations, MMIA retained Boone Karlberg P.C. to provide a defense to the City of Hamilton and its employees and the Bitterroot Public Library and its employees. Boone Karlberg P.C. had and has no role in determining any rights to defense and/or indemnity provided by MMIA


in connection with Mr. Spreadbury's claims. Likewise, Bitterroot Public Library and its employees do not determine a right to defense and/or indemnity from MMIA concerning Mr. Spreadbury's claims.

DATED this 23rd day of May, 2011.


William L. Crowley

SUBSCRIBED AND SWORN TO before me this 23rd day of May, 2011, by
William L. Crowley.




NOTARY PUBLIC FOR THE STATE OF MONTANA
Printed Name: Shannon E. Holdsambeck
Residing at: Missoula, Montana
My Commission Expires: January 27, 2015