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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

Cause No.: CV-11-6^H-DWM-JCL

MICHAEL E. SPREADBURY)	
Plaintiff)	RESPONSE TO LEE
v.)	DEFENDANT PLEADING
BITTERROOT PUBLIC LIBRARY,)	IN RE: SUMMARY
CITY OF HAMILTON,)	JUDGMENT
LEE ENTERPRISES INC.,)	
BOONE KARLBERG PC,)	
Defendants)	

Comes now Plaintiff with response to Lee Enterprises with respect to summary judgment before this Honorable Court.

Statement of Facts

1. There is no "Library Property" (i.e. private property) in the City of Hamilton.

2. A Public library, publically tax supported who leases building and a municipality who owns the property at 306 State St. site of the Bitterroot Public Property (original block #18 City of Hamilton) is taxpayer supported and therefore is **PUBLIC PROPERTY.** This site is nothing but public property, not “Library Property.”

3. When a business like the Ravalli Republic Hamilton conducts business while Spreadbury crafts handwritten note July 9, 2009 requesting defamatory material removed from their paper, there was no abusive language, not privileged court pleading per Montana Code [I don't care to look it up anymore].

4. Substantial evidence, and undisputed fact from LR 56.1 is the United States Constitution, ultimate law in the United States whereby no law can abridge citizen right to peaceful assembly.

5. Spreadbury made one appointment with Library , “several interactions” is a false statement, Germaine to republishing false information by Defendant Lee Enterprises, and their Defense Counsel.

5. Defendants abridged Spreadbury right to peaceful assembly in Hamilton Montana August 20, 2009.

6. Defendants are inserting non-relevant articles and information to this court concerning my free speech November 4, 2009.

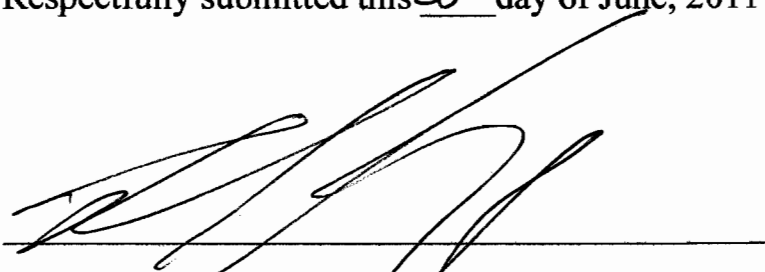
7. Spreadbury believes that the Montana law school does not teach its students about the US Constitution, its protections, nor basic principles of relevancy.

8. Summary Judgment is proper before this court due to peaceful assembly, non-pleading for functional approach to immunity by Defense, and sworn duty of this court to uphold the United States Constitution.

9. Spreadbury has right to peaceful assembly, abided by all Defendants, acting in color of law and violating right established in Amendment 1 US Constitution to which 42 USC §1983 proper in this case.

10. This court is asked to uphold Spreadbury's peaceful assembly August 20, 2009 and grant Summary Judgment for the Plaintiff.

Respectfully submitted this 28th day of June, 2011

A handwritten signature in black ink, appearing to read 'Michael E. Spreadbury', is written over a horizontal line. The signature is stylized and cursive.

Michael E. Spreadbury, Pro/Se Plaintiff