

WILLIAM M. WINDSOR  
MISSOULA COUNTY DETENTION CENTER  
2340 MULLIN ROAD  
MISSOULA, MT 59808

FILED MAY 01 2015

SHIRLEY E. FAUST, CLERK  
By Deputy

MAY 15 AM 8:52

MONTANA FOURTH JUDICIAL DISTRICT COURT, MISSOULA COUNTY

STATE OF MONTANA,  
PLAINTIFF  
-VS-  
WILLIAM MICHAEL WINDSOR,  
DEFENDANT

DEPT. NO. 3  
CASE NO. DC-14-509  
DC  
MOTION REGARDING DISCOVERY

INTRODUCTION

1. COMES NOW WILLIAM M. WINDSOR, DEFENDANT, WHO FILES THIS "MOTION REGARDING DISCOVERY." WILLIAM M. WINDSOR SEEKS APPROVAL OF THE COURT TO TAKE DEPOSITIONS BY VIDEO AND TELEPHONE.

BACKGROUND

2. WILLIAM M. WINDSOR IS INCARCERATED IN THE MISSOULA COUNTY DETENTION CENTER.
3. WILLIAM M. WINDSOR WILL NOT BE ALLOWED TO TRAVEL TO TAKE DEPOSITIONS. MOST OF HIS WITNESSES ARE NOT IN MONTANA.
4. WILLIAM M. WINDSOR IS NOT FROM MONTANA.

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5. WILLIAM M. WINDSOR CANNOT AFFORD COURT REPORTERS.

### ARGUMENT

6. WILLIAM M. WINDSOR NEEDS DISCOVERY BY TELEPHONE AND VIDEO TAPES, AND HE NEEDS TO BEGIN DISCOVERY AS SOON AS POSSIBLE.

WHEREFORE, WILLIAM M. WINDSOR PRAYS THAT THE COURT ORDER THAT WILLIAM M. WINDSOR BE AUTHORIZED TO TAKE DEPOSITIONS BY TELEPHONE AND/OR BY VIDEO; THAT HE WILL BE GRANTED A DAY AT THE JAIL TO SET UP HIS EQUIPMENT AND ENSURE THAT IT IS OPERATING PROPERLY; THE MISSOURI COUNTY DETENTION CENTER SHALL PROVIDE A ROOM TO BE USED FOR THE DEPOSITIONS OR THAT WILLIAM M. WINDSOR WILL BE RELEASED ON GPS MONITOR ON THE DAYS OF DEPOSITIONS; AND GRANT SUCH FURTHER RELIEF AS THE COURT FINDS APPROPRIATE.

THIS 28<sup>TH</sup> DAY OF APRIL 2015,

William M. Windsor  
WILLIAM M. WINDSOR

C  
AFFIRMATION

I SWEAR UNDER PENALTY OF PERJURY THAT  
THE STATEMENTS OF FACT CONTAINED  
HEREIN ARE TRUE AND CORRECT BASED  
UPON MY PERSONAL KNOWLEDGE.

THIS 28<sup>TH</sup> DAY OF APRIL 2015,

William M. Windsor

WILLIAM M. WINDSOR

CERTIFICATE OF CONFERENCE

I ATTEMPTED TO REACH JENNIFER CLARK,  
BUT MY CALLS WERE BLOCKED, AND SHE  
HAS NEVER RESPONDED TO A LETTER.

I WROTE AND CALLED CHRISTOPHER DALY,  
BUT HE DID NOT RESPOND.

THIS 28<sup>TH</sup> DAY OF APRIL 2015,

William M. Windsor

WILLIAM M. WINDSOR

CERTIFICATE OF SERVICE

I HAVE SENT A COPY OF THIS TO THE CLERK  
OF COURT, AND I HAVE ASKED FOR A  
COPY TO BE SENT TO JENNIFER CLARK AND CHRIS DALY.

THIS 28<sup>TH</sup> DAY OF  
APRIL 2015,

William M. Windsor

WILLIAM M. WINDSOR