

William M. Windsor
PO Box 16181
Missoula, Montana 59808
Telephone: 770-578-1094
windsorinmontana@yahoo.com
Defendant, Pro Se

**MONTANA FOURTH JUDICIAL DISTRICT COURT
MISSOULA COUNTY**

State of Montana,	§	Dept. No. 3
Plaintiff,	§	Cause No. DC-14-509
v.	§	
William Michael Windsor,	§	DEFENDANT'S REQUEST
Defendant.	§	FOR DEPOSITION OF
	§	BEN GLADWIN

Comes Now William M. Windsor, Defendant, who hereby requests that this Court authorize the Clerk of the Court to issue a subpoena to the WITNESS for a deposition and production of documents.

1. WITNESS: Ben Gladwin
2. ADDRESS: c/o Jennifer Clark, Missoula County Attorney, 200 W Broadway Street, Missoula, Montana 59802.
3. TIME AND PLACE: As soon as possible at the offices of the Missoula County Attorney, Missoula County Courthouse Annex, 200 West Broadway Street, Missoula, Montana 59802.
4. MEANS OF RECORDING: The deposition will be recorded by audio and video.
5. DOCUMENT PRODUCTION: The WITNESS shall bring the documents specified on Exhibit A hereto.

This 18th day of May 2015,



William M. Windsor

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Request by United States Postal Service to Jennifer Clark, Deputy County Attorney, Missoula County Courthouse, 200 West Broadway Street, Missoula, Montana 59802.

This 18th day of May 2015,



William M. Windsor

EXHIBIT A

William M. Windsor hereby requests that, within 7 days, the WITNESS produce and permit William M. Windsor, or someone acting on his behalf, to inspect, copy, test or sample any designated tangible things that are in your possession, custody or control, not privileged, which are relevant to the subject matter involved in this case, including the existence, description, nature, custody, condition and location of any books, documents, electronic files, or other tangible things and the identity and location of persons having knowledge of any discoverable matter. The WITNESS shall produce anything that appears reasonably calculated to lead to the discovery of admissible evidence.

- (a) Your written response shall state with respect to each item or category, that inspection-related activities will be permitted as requested, unless request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to part of an item or category, that part shall be specified.
- (b) In accordance, the documents shall be organized and labeled to correspond with the categories in the request.
- (c) These requests shall encompass all items within your possession, custody or control.
- (d) These requests are continuing in character so as to require you to promptly amend or supplement your response if you obtain further material information.
- (e) If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous in the construction used, in responding.

INSTRUCTIONS AND DEFINITIONS

Each document request herein seeks all information available to the WITNESS, his attorneys or agents, and any other person acting on his behalf.

1. If the original of a document is within your possession, custody or control, produce it; if not, produce such a copy of it as is in your possession, custody or control. Any copy of a document on which any notation, addition, alteration or change has been made is to be treated as constituting an additional original document.
2. The term “document” is intended to have the broadest meaning permitted by law and specifically includes documents in written and electronic form, including but not limited to electronic mail, online messages, tweets, text messages, online postings, and information for user registrations and postings, including but not limited to, server log information, user’s Internet Protocol address, date and time of the request, cookie identifier, browser type, and language.
3. The term “server log information” shall mean user’s Internet Protocol address, date and time of the request, cookie identifier, browser type, and language.
4. For the purpose of responding, the term “you” and derivations of that pronoun shall refer to Ben Gladwin.
5. For the purpose of responding, the term “Windsor” refers to William M. Windsor also known as Bill Windsor.
6. For the purpose of responding, the term “Lawless America” refers to www.LawlessAmerica.com, www.LawlessAmerica.org, www.facebook.com/lawlessamerica, www.facebook.com/lawlessamerica2, www.youtube.com/lawlessamerica and the project of Windsor that these web pages cover.
7. For the purpose of responding, the term “Sean Boushie” refers to Sean M. Boushie, an employee of the University of Montana.
8. For the purpose of responding, the term “Joeyisalittlekid” or “Joeyisalittlekid.blogspot.com” refers to the website <http://joeyisalittlekid.blogspot.com>
9. The term “website content” refers to all information ever published or displayed on a website.
10. Documents should be organized in folders or stacks with the document request number on the top.

DOCUMENT REQUESTS

1. Your resume.
2. Your driver's license.
3. Your screen name(s) on Joeyisalittlekid.blogspot.com
4. All documents relating or referring to, or evidencing, reflecting, or constituting your Human Resources records with the University of Montana.
5. All documents relating or referring to, or evidencing, reflecting, or constituting your job application with the University of Montana.
6. All documents relating or referring to, or evidencing, reflecting, or constituting statements made by you regarding Windsor.
7. All documents relating or referring to, or evidencing, reflecting, or constituting statements made by you regarding Sean Boushie.
8. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or communications or information about Windsor or Lawless America.
9. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or communications or information about Sean Boushie.
10. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Internet use by Sean Boushie.
11. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about email accounts used at any time by Sean Boushie.
12. All documents relating or referring to, or evidencing, reflecting, or constituting emails sent by Sean Boushie from January 1, 2012 to the present.

13. All documents relating or referring to, or evidencing, reflecting, or constituting emails received by Sean Boushie at his University of Montana email address from January 1, 2012 to the present.

14. All documents relating or referring to, or evidencing, reflecting, or constituting all inquiries received by you or the University of Montana Police Department regarding Sean Boushie.

15. All reports that you, the University of Montana Police Department, or the University of Montana IT Department have generated regarding Sean Boushie or University of Montana IP addresses.

16. List of all IP addresses used by the University of Montana and identification as to the location from which each is accessed.

17. Statements that you have given to any law enforcement authority or anyone else regarding Windsor or Sean Boushie.

18. Complaints received by the University of Montana Police Department about stalking, cyberstalking, unwanted online communications, or electronic harassment involving the University of Montana from January 1, 2009 to the present.

19. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you and all persons known to you who have knowledge of the facts and circumstances alleged in Cause No. DC-14-509 in the Fourth Judicial District Court in Missoula County Montana.

20. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about names, screen names, messages, registration information, and server log information for Sean Boushie.

21. All documents relating or referring to, or evidencing, reflecting, or constituting complaints about Windsor or Lawless America.

22. All documents relating or referring to, or evidencing, reflecting, or constituting complaints about Sean Boushie.
23. All documents relating or referring to, or evidencing, reflecting, or constituting complaints made by Sean Boushie.
24. All documents relating or referring to, or evidencing, reflecting, or constituting complaints made by Wynette Boushie.
25. All documents relating or referring to, or evidencing, reflecting, or constituting 911 calls received from Sean Boushie from August 4, 2013 to the present.
26. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or communications or information about Crystal Cox.
27. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or communications or information about Michael Spreadbury.
28. All documents relating or referring to, or evidencing, reflecting, or constituting communication to or from Chris Shermer, Claudia Denker-Eccles, Lucy France, Sean Boushie, Wynette Boushie, or Adrian Irish.
29. All documents relating or referring to, or evidencing, reflecting, or constituting recordings of investigations regarding Windsor.
30. All documents relating or referring to, or evidencing, reflecting, or constituting documents or other information received from Sean Boushie.
31. All documents relating or referring to, or evidencing, reflecting, or constituting recordings of investigations regarding Sean Boushie.
32. All documents relating or referring to, or evidencing, reflecting, or constituting documents or other information received from Windsor.

33. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Casey P. Hargrove.

34. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Sean D. Fleming.

35. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Allie Overstreet.

36. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Dennis Brearley of the Ellis County Texas Sheriff's Department.

37. All documents relating or referring to, or evidencing, reflecting, or constituting investigations of Windsor.

38. All documents relating or referring to, or evidencing, reflecting, or constituting investigations of Lawless America.

39. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about the Ellis County Texas Sheriff's Department or jail.

40. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about the Ada County Idaho Sheriff's Department or jail.

41. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about the Meridian Police Department in Meridian Idaho.

42. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about the Ada County Prosecutor's Office.

43. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about complaints made by

Windsor to the University of Montana Police Department, including records of dates and times received.

44. All documents relating or referring to, or evidencing, reflecting, or constituting reports made about complaints made by Windsor to the University of Montana Police Department, including records of action taken.

45. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about complaints made by Sean Boushie to the University of Montana Police Department, including records of dates and times received.

46. All documents relating or referring to, or evidencing, reflecting, or constituting reports made about complaints made by Sean Boushie to the University of Montana Police Department, including records of action taken.

47. All documents relating or referring to, or evidencing, reflecting, or constituting criminal background report on Windsor.

48. All documents relating or referring to, or evidencing, reflecting, or constituting driving records of Windsor.

49. All documents relating or referring to, or evidencing, reflecting, or constituting criminal background report on Sean Boushie.

50. All documents relating or referring to, or evidencing, reflecting, or constituting driving records of Sean Boushie.

51. All documents relating or referring to, or evidencing, reflecting, or constituting criminal background report on Wynette Boushie.

52. All documents relating or referring to, or evidencing, reflecting, or constituting driving records of Wynette Boushie.

53. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana

Police Department since January 1, 2012 regarding criminal charges involving tweeting.

54. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department since January 1, 2012 regarding criminal charges involving sending an email to someone who did not apply for a protective order.

55. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department since January 1, 2012 regarding a requirement in a Temporary Order of Protection that someone give their website to a non-family member.

56. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department regarding ownership and/or use of missoulagloryholefun@yahoo.com

57. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department regarding ownership and/or use of seanboushie@gmail.com

58. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department regarding ownership and/or use of the screen name John Smith on www.Joeyisalittlekid.blogspot.com

59. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department regarding ownership and/or use of the screen name tinyfeetnhands on www.Joeyisalittlekid.blogspot.com

60. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana

Police Department regarding ownership and/or use of email addresses and IP addresses that Windsor says have been used by Sean Boushie.

61. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department into Sean Boushie having sexual blackmail on anyone.

62. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department into Sean Boushie being a paid cyberstalker.

63. All documents relating or referring to, or evidencing, reflecting, or constituting records to indicate that Sean Boushie is a Confidential Informant.

64. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department about email addresses, names, IP addresses, and other information to identify users of screen names on Joeyisalittlekid.blogspot.com.

65. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department into Windsor's use of screen names on Joeyisalittlekid.blogspot.com.

66. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department into Facebook's information regarding the identity of users and their contact information and IP address use for all Facebook pages used from January 1, 2012 to the present by Sean Boushie, Sean M. Boushie, Wynette Boushie, William M. Windsor, Bill Windsor, Walter Windsor, Waltor Windsor, Mary Windsor, Barbara Windsor, Babs Windsor, William Windsore, Bill Windsor, Crystal Cox, Ginger Snap, Gingersnap, Casey P. Hargrove, Shonda Hargrove,

Clyde Hargrove, Sean D. Fleming, Petunia Snodgrass, Kellie McDougald, Allie Overstreet, Rachel Kain, Sam Round.

67. All documents relating or referring to, or evidencing, reflecting, or constituting proof that the University of Montana Police Department received complaints about each of the charges made against Windsor in DR-14-509.

68. All documents relating or referring to, or evidencing, reflecting, or constituting results of investigations conducted by the University of Montana Police Department about Sean Boushie being paid to stalk and harass people.

69. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or communications or information about Barbara Hachenburg.

70. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Windsor.

71. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Overstreet.

72. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Crystal Cox.

73. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Mary Wilson or Mary Deneen.

74. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Michael Spreadbury.

75. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Lea Anne Scott.

76. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Shawn Rutherford.

77. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Stephanie DeYoung.

78. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Paul Stramer.

79. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Sean Boushie.

80. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, the University of Montana or any other entity or person about any employee of the University of Montana allegedly stalking, harassing, defaming, libeling, slandering, cyberstalking, or threatening anyone.

81. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any charges against any employee of the University of Montana by any law enforcement agency, any arrests, and any convictions for violating the law.

82. All documents relating or referring to, or evidencing, reflecting, or constituting information about Windsor or Lawless America provided to you or any employee of the University of Montana by anyone or obtained by you from any source.

83. All documents relating or referring to, or evidencing, reflecting, or constituting emails or online messages regarding Windsor sent by you or any employee of the University of Montana in 2012 or 2013.

84. All documents relating or referring to, or evidencing, reflecting, or constituting accounts that you or any employee of the University of Montana have ever set up with Facebook, Yahoo, Google, Lawless America, any email provider, or any website on which you have ever posted a comment.

85. All documents relating or referring to, or evidencing, reflecting, or constituting information about Sean Boushie's participation in email, online messaging, and online posting.

86. All documents relating or referring to, or evidencing, reflecting, or constituting information about Sean Boushie's employment with the University of Montana, including but not limited to performance appraisals, contracts, personnel file information, compensation information.

87. All documents relating or referring to, or evidencing, reflecting, constituting, or showing telephone calls and Internet activity by Sean Boushie in 2012 and 2013.

88. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications by you or any employee of the University of Montana with Windsor, including but not limited to, any and all telephone discussions with Windsor, notes or recordings of oral discussions with Windsor, emails, letters, faxes, or messages sent to or received.

89. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you or any employee of the University of Montana and Joeyisalittlekid.blogspot.com or anyone who posts on the Joeyisalittlekid.blogspot.com website.

90. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Windsor's deceased father.

91. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Windsor's deceased mother.

92. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of

publication, information, or communication about a Facebook page pretending to be Bill Windsor.

93. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Barbara or Babs Windsor.

94. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about Windsor as the victim of stalking, harassment, defamation, libel, slander, and threats.

95. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding threats that you or any employee of the University of Montana have made to Windsor or Lawless America.

96. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding threats that you or any employee of the University of Montana have made to anyone.

97. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding any cease and desist notices published by Windsor in an attempt to stop Sean Boushie from making contact and defaming Windsor.

98. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of

publication, information, or communication regarding Windsor' published request for retractions from Sean Boushie or anyone else.

99. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, telephone records, Internet records, recordings, or any other form of publication, information, receipts, logs, or communication to indicate that you or any employee of the University of Montana is an experienced cyberstalker.

100. All documents relating or referring to, or evidencing, reflecting, or constituting web pages of or about Windsor or Lawless America.

101. All documents relating or referring to, or evidencing, reflecting, or constituting University police reports and information from or about Windsor or Lawless America.

102. All documents relating or referring to, or evidencing, reflecting, or constituting University police reports and information from or about Sean Boushie.

103. All documents relating or referring to, or evidencing, reflecting, or constituting University police video or photographs of Windsor or Sean Boushie, including the Dashcam video taken of Windsor by officers on August 20, 2013.

104. All documents relating or referring to, or evidencing, reflecting, or constituting University police investigations regarding Sean Boushie.

105. All documents relating or referring to, or evidencing, reflecting, or constituting communication with any University employees or administrators that refer to Windsor or Sean Boushie.

106. All documents relating or referring to, or evidencing, reflecting, or constituting communication with anyone in government regarding cyberstalking, harassment, or defamation.

107. All documents relating or referring to, or evidencing, reflecting, or constituting University of Montana police policies regarding its employees.