

William M. Windsor
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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
	§	JUDGE KAREN TOWNSEND

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: Karen Townsend
2. ADDRESS: Fourth Judicial District Court, 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 Karen Townsend.
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. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Windsor or Lawless America.
4. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Sean Boushie.
5. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Crystal Cox.
6. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or information about Michael Spreadbury.
7. Statements that you have given to any law enforcement authority or anyone else regarding William M. Windsor or Sean Boushie.
8. 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.
9. All documents relating or referring to, or evidencing, reflecting, constituting, or showing petitions filed by Sean Boushie in the Fourth Judicial District Court in Missoula County Montana.
10. All documents relating or referring to, or evidencing, reflecting, constituting, or showing complaints filed against William M. Windsor in the Fourth Judicial District Court in Missoula County Montana.
11. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial

District Court in Missoula County Montana in which a temporary order of protection or permanent order of protection was issued to deny tweeting.

12. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection or permanent order of protection was issued to deny the right to email someone who did not apply for the protective order or someone who was not listed as a victim in the petition.

13. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection or permanent order of protection was issued to deny the right to publish a person's name in a legal document published online.

14. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection or permanent order of protection was issued to require a person not related to the petitioner to give control and/or ownership of a website to a petitioner.

15. All documents relating or referring to, or evidencing, reflecting, constituting, or showing recordings and transcripts involving matters in which Sean Boushie or William M. Windsor were parties.

16. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana where a protective order was not registered as per MCA 40-15-303.

17. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana where a protective order was issued based upon alleged acts that occurred in a county other than Missoula.

18. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana where a protective order was issued to deny Constitutionally-protected rights.

19. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana where a protective order was issued to deny a person the right to blog about another person.

20. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana where a protective order was issued to deny a person the right to send a tweet containing the name of another person.

21. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana where a protective order was issued to deny a person the right to mail or email an attorney for a party in a lawsuit.

22. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana where a protective order was issued to deny a person the right to mail or email legal mail to anyone who did not take advantage of the program in MCA 40-15-115.

23. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial

District Court in Missoula County Montana involving a protective order that resulted in a petitioner or respondent being charged with perjury or false swearing.

24. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was maintained for longer than 20 days.

25. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was maintained for longer than 100 days.

26. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was maintained for longer than 500 days.

27. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was converted to a permanent order of protection without a hearing.

28. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was continued for longer than 100 days without a hearing.

29. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was continued for longer than 500 days without a hearing.

30. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was converted to a permanent order of protection without a hearing.

31. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which an order of protection was issued without the notice in MCA 40-15-204(9).

32. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which an amendment to an order of protection was maintained when the opposing party was not served.

33. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which an order of protection was issued without the notice in MCA 40-15-204(6).

34. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which an order of protection was made valid in a state other than Montana by your order.

35. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which an order of protection was issued for a person who did not apply for a protective order or where their family member did not apply for them.

36. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial

District Court in Missoula County Montana in which an order of protection was issued for every employee of the University of Montana.

37. All documents relating or referring to, or evidencing, reflecting, constituting, or showing cause numbers for every cause in the Fourth Judicial District Court in Missoula County Montana in which a temporary order of protection was denied because the judge said the respondent had to first be convicted.