

William M. Windsor
110 E Center Street #1213
Madison, SD 57042
Telephone: 770-578-1094
bill@billwindsor.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,	§	MOTION TO DISMISS
Defendant.	§	CHARGE #5 - EMAIL

COMES NOW William M. Windsor, Defendant, who files this “Motion to Dismiss Charge #5 – Email,” and shows the Court as follows:

INTRODUCTION

1. William M. Windsor has been simultaneously charged with five protective order violations. (See DC-14-509 Docket # 1, 2, 3, 4, and 5.)
2. There are many reasons why this and all the charges should be dismissed. Other grounds have been or will be presented in separate motions. This motion simply addresses the specific reason why this unique charge must be dismissed.

FACTUAL BACKGROUND

3. The charge reads: “On or about the 6th day of February, 2014, the above-named Defendant committed the offense of violation of an order of protection when, with knowledge of the order, purposely or knowingly violated a provision of an order provided for in 40-4-121 or an order of protection under Title

40, chapter 15, to wit: “Defendant emailed Claudia Denker-Eccles, Associate Counsel for the University of Montana, a third or subsequent offense.”

4. Exhibit 24 in the folder on the Flash Drive named Missoula Montana Criminal Case filed with the Defendant’s Motion to Quash Bench Warrant is a true and correct copy of something that was sent on that date: Notice of Filing of Affidavit of Mary Wilson. This is a legal document that William M. Windsor was required to send to Claudia Denker-Eccles by federal law. As she was the attorney-of-record for the University of Montana, a defendant in a case filed by William M. Windsor, she had to be sent this notice and affidavit. Exhibit 25 in the folder on the Flash Drive named Missoula Montana Criminal Case filed with the Defendant’s Motion to Quash Bench Warrant is a true and correct copy of evidence that the University of Montana was a defendant, that she is the listed agent, and that she was served with the required legal service copy.

5. On August 17, 2015, each of the State’s witnesses were interviewed. The witness with knowledge of the email is Claudia Denker-Eccles, an attorney for the University of Montana. She testified that she received an email. She had no personal knowledge as to who sent the email other than the name Bill Windsor was on it. She did not report the email to anyone. She did nothing but advise her superior that she received an email. She never made a criminal complaint of any type. She was under the mistaken impression that the University of Montana had applied for and obtained a protective order.

ARGUMENT

A. THE TEMPORARY ORDER OF PROTECTION DOES NOT PROHIBIT EMAILING TO ATTORNEYS REGARDING LITIGATION.

6. The Temporary Order of Protection (“TOP”) on which the charges are based does not prohibit emailing to attorneys regarding litigation. A true and

correct copy of the TOP served on William M. Windsor is attached as Exhibit A hereto.

7. There is nothing in the expired TOP to prohibit William M. Windsor from having contact with the attorney for the University of Montana. He was required by Federal Rules of Civil Procedure Rule 5 to do so.

8. Montana law provides that orders of protection may apply only to the applicants. (*Montana Annotated Code 40-15-116, 40-15-101, 40-15-102.*) Attorney Claudia Denker-Eccles was not a victim nor was she an applicant, so this does not apply to her. Legal mail is not restricted by Montana protective order statutes.

9. As the TOP does not prohibit emailing to attorneys regarding litigation, sending an email to an attorney regarding litigation cannot violate it.

10. This charge must be dismissed.

B. THE STATE HAS NO EVIDENCE THAT WILLIAM M. WINDSOR SENT THIS EMAIL.

11. The State has no evidence to show that William M. Windsor sent this email. None of the State's three witnesses have personal knowledge of this, and there is no evidence in the evidence provided by the State. Jennifer Clark confirmed by email on August 21, 2015 that all of the State's evidence has been provided. A true and correct copy of this email is Exhibit B hereto.

12. This charge must be dismissed.

C. THERE IS NO PROTECTIVE ORDER THAT PROTECTS CLAUDIA DENKER-ECCLES FROM RECEIVING AN EMAIL.

13. Page 1 of the TOP says the "Protected Persons" are Sean Boushie and Wynette Boushie. Claudia Denker-Eccles is not a "protected person."

14. Legal mail is not restricted by Montana protective order statutes. In fact, the *Montana Annotated Code 40-15-117* has a very specific provision to allow protected parties to opt to have the Montana Secretary of State receive their legal mail instead of them. Sean Boushie, Wynette Boushie, and Attorney Claudia Denker-Eccles did not opt for this.

15. Sean Boushie and Attorney Claudia Denker-Eccles have sent legal mail to William M. Windsor that required responses. [Exhibit 26 in the folder on the Flash Drive named Missoula Montana Criminal Case filed with the Defendant's Motion to Quash Bench Warrant is a true and correct copy of an email that Claudia Denker-Eccles sent to William M. Windsor on August 29, 2013 (a time that the Temporary Order of Protection was in place).] [A true and correct copy of some of the mail sent to William M. Windsor by Sean Boushie is on the Flash Drive -- Exhibit 48 in the folder named Missoula Montana Criminal Case filed with the Defendant's Motion to Quash Bench Warrant.]

16. This charge must be dismissed.

D. THE TEMPORARY ORDER OF PROTECTION WAS VAGUE.

17. The TOP was vague, as William M. Windsor stated in his sworn Motion on August 26, 2013. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case filed with the Motion to Quash Bench Warrant in this case.] The TOP was never modified to make it intelligible.

18. Various terms were never defined.

19. William M. Windsor asked the court to clarify what could and could not be done with legal mail, and the court failed to address the issue.

20. This charge must be dismissed.

E. WILLIAM M. WINDSOR DID NOT SEND AN EMAIL KNOWINGLY AND PURPOSELY WITH THE INTENT TO VIOLATE A PROTECTIVE ORDER AND COMMIT A CRIME.

21. A key element that the State must prove is that William M. Windsor “knowingly and purposely” violated the protective order, that he intended to commit a crime.

22. William M. Windsor did not do anything purposely or knowingly. If sending legally-required mail was to be restricted in the expired TOP, the law requires that it be spelled out. William M. Windsor identified the ambiguity in the TOP in a Motion filed three days after he was served.

23. William M. Windsor has sworn that he never did anything to knowingly and purposely violate a protective order.

24. This charge must be dismissed.

F. AN EMAIL TO AN ATTORNEY ON A LEGAL MATTER DOES NOT VIOLATE MONTANA LAWS ON STALKING, SO SUCH AN EMAIL MAY NOT CONSTITUTE A VIOLATION OF A PROTECTIVE ORDER.

25. Montana laws on protective orders are to promote safety and protection of all victims of stalking. Stalking is following someone or mailing, emailing, or having electronic communication with the protected person. Emailing a required legal mailing to an attorney does not fall anywhere in the definition of “stalking.”

26. The TOP claims the court found that Sean Boushie was “in danger of harm.” Sean Boushie was not harmed by an email that was not sent to him that simply complied with the Federal Rules of Civil Procedure. In fact, the email was sent to his attorney to avoid sending it directly to him.

27. This charge must be dismissed.

G. EMAILING AN ATTORNEY IS A CONSTITUTIONALLY-PROTECTED ACTIVITY, SO IT MAY NOT BE RESTRICTED BY A PROTECTIVE ORDER.

28. Montana law states very clearly (MCA 45-5-220) that stalking does not apply to Constitutionally-protected activity. Freedom of speech and freedom of the press are the most fundamental of the Constitutionally-protected activities. Emailing an attorney cannot be restricted based upon the First Amendment to the United States Constitution. Similar protection is in the Montana Constitution.

29. No judge can legally order anyone to not email an attorney with documents required by federal law.

30. This charge must be dismissed.

H. THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT HAS ORDERED THAT WILLIAM M. WINDSOR WAS REQUIRED BY LAW TO SEND THIS EMAIL.

31. William M. Windsor filed a motion with the United States Court of Appeals for the Ninth Circuit regarding sending legal mail to Claudia Denker-Eccles. A true and correct copy of this Motion is attached as Exhibit C.

32. The United States Court of Appeals for the Ninth Circuit issued an order making it clear that William M. Windsor was obligated to send the email. A true and correct copy of this Order is attached as Exhibit D.

33. This charge must be dismissed.

CONCLUSION

34. The State has no evidence that William M. Windsor sent an email. The State has no evidence or testimony to indicate that he knowingly and purposely sent an email to violate a protective order. Sending an email to Claudia Denker-Eccles was required by the Federal Rules of Civil Procedure. Claudia Denker-Eccles was not protected by any order of protection, and she never made a complaint about this email. Jennifer Clark swore to Judge Karen Townsend that William M. Windsor knowingly and purposely sent an email to violate a protective order, but it was a false sworn pleading by Jennifer Clark.

WHEREFORE, William M. Windsor prays that Charge #5 - Email be dismissed; and for such other relief as the Court feels is appropriate.

This 24th day of August 2015,

A handwritten signature in black ink, appearing to read "William M. Windsor", written over a horizontal line.

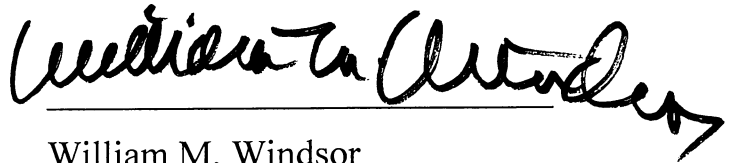
William M. Windsor

VERIFICATION

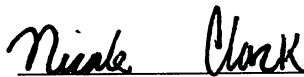
Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

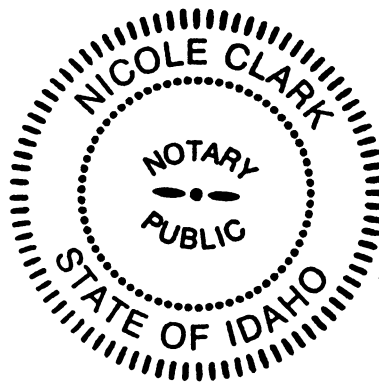
This 24th day of August 2015.


William M. Windsor

Sworn and subscribed before me this 24th day of August 2015.



Notary Public



CERTIFICATE OF CONFERENCE

I hereby certify that I communicated with Jennifer Clark, and she opposes this Motion.

This ^{26th}~~24th~~ day of August 2015,



William M. Windsor

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Motion by email to Jennifer Clark, Deputy County Attorney, at jsclark@co.missoula.mt.us and Christopher Daly.

This ^{26th}~~24th~~ day of August 2015,



William M. Windsor

Exhibit

A

Temporary Order of Protection

- Temporary Ex Parte Order and Notice of Hearing
- Amended Temporary Order and Notice of Hearing

Case No. OP-2013-00198

Municipal Court, Missoula County, Montana.
 Before the Honorable Judge Warren

Petitioner/Protected Person

First Middle Initial Last

Sean M. Boushie

And/Or on behalf of family members:

First/Middle Initial/Last Name	Year of Birth	Sex
<u>Wynne L Boushie</u>	<u>72</u>	<u>M (F)</u>
		<u>M F</u>
		<u>M F</u>

Petitioner/Protected Person Identifiers

Year of Birth of Petitioner

1968

Male Female

Other Protected Person/s:

First/Middle Initial/Last Name	Year of Birth	Sex
		<u>M F</u>
		<u>M F</u>
		<u>M F</u>

Respondent

First Middle Initial Last

William M Windsor

Respondent's Address:

Respondent's Identifiers

Sex	Race	Year of Birth	Height	Weight
<u>M F</u>	<u>Cauc</u>		<u>700</u>	<u>5'8"</u>
<u>Eye color</u>	<u>Hair color</u>	<u>Driver's License State</u>		
	<u>White</u>	<u>GA</u>		
<u>Distinguishing Features</u>				
<u>Beard & Mustache</u>				

Petitioner's/Protected Person's Relationship to Respondent: check all that apply

- Married
- Were married, but are now separated
- Divorced
- Currently dating or having an ongoing intimate relationship
- Live together
- Lived together in the past
- Have a child and/or children together
- Family member or former family member of Respondent
- Dated or had an ongoing intimate relationship in the past
- Victim of sexual assault
- Victim of stalking
- Victim of assault
- Victim of other:

CAUTION:

- Weapon Involved
- Weapon on Property

The court has jurisdiction over the parties and subject matter. The terms of this Order shall be effective until 09/16/13 at 1159 PM/unless terminated earlier by another Court Order. By Judge Sam Warren

WARNINGS: This Order shall be enforced, even without registration, by the courts of any state, the District of Columbia, and U.S. Territory, and may be enforced on Tribal Lands (18 U.S.C. Section 2265). Crossing state, territorial, and tribal boundaries to violate this Order may result in federal imprisonment (18 U.S.C. Section 2262). Federal law provides penalties for possessing, transporting, shipping, or receiving any firearm or ammunition (18 U.S.C. Section 922(g)(8)(9)). Violation of this Order may be a criminal offense under applicable Federal or Tribal law and is a criminal offense under Mont. Code Ann. § 45-5-220 or § 45-5-626 and may carry penalties of up to \$10,000 in fines and up to a 5 year jail sentence. It is a misdemeanor under Montana Code Annotated 45-5-220 and/or 45-5-626 for the Respondent, even if invited and after notice of this Order, to violate the provisions of this Order. Further, under Montana Code Annotated §§ 45-2-301 and 302(3), it is a crime for any person to aid and abet a crime, or, not being present, to advise and encourage a crime. Under Montana Code Annotated § 45-2-303, any person who counsels, aids, solicits or incites another to commit a misdemeanor is guilty of a misdemeanor. Therefore, it may be a crime for any person to encourage or invite contact between the Respondent and the Petitioner, except such contact as expressly permitted by the above Order.

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Municipal COURT, MISSOULA, MONTANA

JUDGE Worren

Sean M. Boushik
Petitioner,

vs.
William Windsor
Respondent.

CAUSE NO. OP-2013-00198

TEMPORARY ORDER OF PROTECTION AND ORDER SETTING HEARING

On 08/21, 2013, the Court considered the Petitioner's request for a Temporary Order of Protection.

THE COURT FINDS from the petition that the Petitioner is in danger of harm. The court issues the following order immediately, under Mont. Code Ann. § 40-15-201 (2009), and without notice to the Respondent:

IT IS ORDERED that the Respondent is restrained as follows:

1. Respondent must not threaten to commit or commit acts of violence against Petitioner and the following Protected Persons: Wynne He L. Boushik (PCO 01)
2. Respondent shall not harass, annoy, disturb the peace of, telephone, email, contact, or otherwise communicate directly or indirectly, with Petitioner and the following Protected Persons: Wynne He L. Boushik, Ueff M. Steff
(If the same people are listed in #1, write "see #1"). (PCO 05)
3. The location of my current residence is confidential. (Do not write your address below.)
4. Respondent must stay 500 feet or other suitable distance _____ feet (not to exceed 1500 feet) away from Petitioner's residence at: 570 Grandview Drive
5. Respondent must stay 500 feet or other suitable distance _____ feet from Petitioner and the following Protected Persons: Wynne He L. Boushik
6. Respondent must stay 500 feet or other suitable distance _____ feet away from Petitioner's place of employment at: University of Montana

1 7. Respondent must stay 1500 feet or other suitable distance _____ feet away from Petitioner's and/or
2 Petitioner's child(ren)'s school(s) at: _____
3 _____

4 8. Respondent must stay 1500 feet or other suitable distance _____ feet away from any of the following
5 addresses frequented by Petitioner and/or other Protected Person: _____
6 _____ (PCO 04)

7 9. Respondent shall not take the following child(ren) from Missoula County: _____
8 _____

9 10. Respondent shall not possess these firearms: Taurus Judge (PCO 07)

10 11. Respondent must not take, hide, sell, give away, borrow against, damage, or otherwise dispose of the
11 following property: _____

12 12. Respondent must give Petitioner and/or Protected Person's possession or use of the following items
13 (items may include the residence, automobile and other *essential personal property, regardless of*
14 *ownership*): _____

- 15 13. Law enforcement shall:
- 16 Remove the Respondent from the residence at: _____
 - 17 Place the Protected Person in possession of the residence at: _____
 - 18 Supervise the removal of:
 - 19 Protected Person's property listed in 12 above.
 - 20 Respondent's items needed for employment and necessary personal effects (at peace officer's
21 discretion) from the residence.

22 14. The Court deems that the following additional relief is necessary to provide for the safety and welfare of
23 the Petitioner or other individuals designated in this Petition. Release of www.seamboat51e.co
24 To petitioner, Respondent shall not post
25 Petitioner's name on tv

1 **HEARING**

2 A hearing on the Petitioner's request that this Court Order the Order of Protection continue for a specific
3 time or continue permanently will be held before this court on 09/09/13, the 9th day of September,
4 2013, at the hour of 2:30 o'clock p.m., or as soon thereafter as the matter may be heard, in the following
5 courtroom:

6 <i>Municipal Court - City Hall</i>	<i>Justice Court I</i>	<i>Justice Court II</i>	<i>District Court</i>
7 <i>435 Ryman</i>	<i>200 W. Broadway</i>	<i>200 W. Broadway</i>	<i>200 W. Broadway</i>
8 <i>Missoula, MT</i>	<i>Missoula, MT</i>	<i>Missoula, MT</i>	<i>Missoula, MT</i>

9 This Temporary Order of Protection shall continue in full force and effect until 09/16/13, the 16th day of
10 September, 2013, at the hour of 11:59 o'clock p.m. unless continued at the hearing.

11 **Petitioner: Report all violations of this Order of Protection to law enforcement by calling 911. If you fail
12 to appear for the Hearing, this Order may be dismissed.**

13 **Respondent: If you fail to appear for the Hearing, the Judge's decisions in this case will be made without
14 your presence. This decision could affect your rights to own or possess firearms.**

15 **Petitioner and Respondent: You may not agree to violate the terms of this Order.**

16 **WARNING**

17 **VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE UNDER MONT. CODE ANN. 45-5-
18 220 OR 45-5-626 AND MAY CARRY PENALTIES OF UP TO \$10,000 IN FINES AND UP TO A 5 YEAR
19 JAIL SENTENCE.**

20 **THIS ORDER IS ISSUED BY THE COURT AND THE RESPONDENT IS FORBIDDEN TO DO
21 ANY ACT LISTED IN THE ORDER, EVEN IF INVITED BY THE PETITIONER OR ANOTHER
22 PERSON. THIS ORDER MAY BE AMENDED ONLY BY FURTHER ORDER OF THIS COURT OR
23 ANOTHER COURT THAT ASSUMES JURISDICTION OVER THIS MATTER.**

1 The Sheriff is hereby directed to serve, without cost to the Petitioner, a copy of this Temporary Order of
2 Protection, together with a copy of the Petitioner's petition, upon the Respondent and to file a return of service
3 with the Clerk of this Court. Upon receipt of proof of service of this Order, the Clerk is hereby directed to mail or
4 otherwise promptly deliver a copy of this Order, together with a copy of the proof of service, to the following law
5 enforcement agencies: MISSOULA COUNTY SHERIFF'S OFFICE (Warrants).

6 ISSUED this 23 day of August, 2013, at the hour of 10:45 a.m.

7
8 Sam Warren
9 JUDGE

10 SHERIFF'S RETURN.

11 I served this Temporary Order of Protection on the Respondent by delivering a copy to him/her at ___ : ___
12 o'clock __.m. on (date) _____, 201__ at (location)

13 DATED this ___ day of _____, 201__.

14 _____
15 Signature of Server

Exhibit

B

Subject: Re: DC-14-509: Package from your desk
From: Jennifer Clark (jsclark@co.missoula.mt.us)
To: windsorinmontana@yahoo.com;
Cc: cdaly@mt.gov;
Date: Friday, August 21, 2015 3:28 PM

You have all of the discovery in this case.

>>> William Windsor <windsorinmontana@yahoo.com> 8/21/2015 12:34 PM >>>

Ms. Clark:

At the Chris Shermer witness interview, you stated that the reason for the delay in the time Mr. Shermer "investigated the case" and the time of the charges was because the package sat on your desk.

Please produce that package.

Please advise,

William M. Windsor

Exhibit

C

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

William M. Windsor	§	No. 14-36042
Plaintiff – Appellant,	§	
v.	§	D.C. No. 9:13-cv-00311-DLC
Sean M. Boushie, University of	§	U.S. District Court for Montana,
Montana, John Does 1-100,	§	Missoula
Defendants – Appellees.	§	

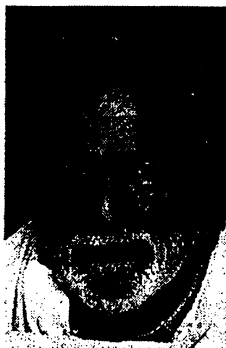
MOTION FOR APPROVAL OF SERVICE

Appellant, William M. Windsor (“Windsor”), hereby files this MOTION FOR APPROVAL OF SERVICE. Windsor shows this Court as follows:

1. William M. Windsor seeks the approval of this Court for him to send service copies of filings to the addresses shown in the Certificate of Service.

WANTED

William Michael Windsor AKA: William M. Windsor
AKA: Bill Windsor



Age: 66
Date of Birth: October 2, 1948
Height: 6'
Weight: 240 pounds

Hair: Gray
Eyes: Green
Race: White
Nationality: United States

Windsor is wanted in the state of Montana for felony and misdemeanor offenses of violating an order of protection. He is contesting extradition from Texas to Montana. On December 23, 2014, Texas Governor Rick Perry, at the request of Montana Governor Steve Bullock, issued a warrant for the arrest of Windsor, so that Windsor may be returned to Montana to be dealt with according to law.

If you have information about Windsor's whereabouts please call the
Ellis County Sheriff's Office at: (972) 825-4901.

2. William M. Windsor has been charged with a felony by the counsel for Appellee, the University of Montana, for mailing a legally-required service copy to her in the underlying case. William M. Windsor has had criminal complaints filed against him by Appellee, Sean Boushie, for mailing legally-required service copies to him. William M. Windsor was illegally detained in Ellis County Texas, illegally incarcerated, illegally denied bond, and illegally denied discharge after 30 days pursuant to the Universal Criminal extradition Act.

William M. Windsor was wrongfully imprisoned for 53 days.

3. Missoula County Montana now has a Bench Warrant for William M. Windsor for emailing the required legal notice to the counsel for the University of Montana, allegedly sending a Tweet containing the name of Appellee Sean Boushie, publishing Appellee Sean Boushie's name four times in two legal documents, and for not releasing the Appellant's TV show website to Sean Boushie based upon on an ex parte temporary order of protection issued over 500 days ago on August 21, 2013. A true and correct copy of the expired ex parte Temporary Order of Protection is attached as Exhibit 1. A true and correct copy of the Missoula County Attorney's file documents that resulted in five criminal charges against the Appellant are attached as Exhibit 2. A true and correct copy of the Wanted Poster that has been published worldwide for felony emailer William M. Windsor is attached as Exhibit 3.

4. The felony charge reads:

"On or about the 6th day of February, 2014, the above-named Defendant committed the offense of violation of an order of protection when, with knowledge of the order, purposely or knowingly violated a provision of an order provided for in 40-4-121 or an order of protection under Title 40, chapter 15, to wit: "Defendant emailed Claudia Denker-Eccles, Associate Counsel for the University of Montana, a third or subsequent offense."

5. Exhibit #4 is a true and correct copy of what was sent on that date:

Notice of Filing of Affidavit of Mary Wilson. This is a legal document that

William M. Windsor was required to send to Claudia Denker-Eccles by federal law. As she was the attorney-of-record for the University of Montana, a defendant in the underlying case filed by William M. Windsor, she had to be sent this notice and affidavit.

6. Page 1 of the TOP says the “Protected Persons” are Sean Boushie and Wynette Boushie. Claudia Denker-Eccles is not a “protected person.”

7. Page 2 of the TOP says:

“2. Respondent must not harass, annoy, disturb the peace of, telephone, email, contact, or otherwise communicate directly or indirectly with Petitioner and the following Protected Persons: Wynette Boushie and U of M Staff.”

8. U of M Staff was never defined. And if publishing a legal document was to be restricted in the TOP, the law requires that it be spelled out with an explanation of how that is not a Constitutionally-protected right. William M. Windsor identified the ambiguity in the TOP in a Motion filed three days after he was served on August 26, 2013.

9. Legal mail is not restricted by Montana protective order statutes. In fact, the *Montana Annotated Code 40-15-117* has a very specific provision to allow protected parties to opt to have the Montana Secretary of State receive their legal mail instead of them. Sean Boushie, Wynette Boushie, and Attorney Claudia Denker-Eccles did not opt for this.

10. There is nothing in the expired ex parte TOP to prohibit William M. Windsor from having contact with the attorney for the University of Montana. He was required by Federal Rules of Civil Procedure Rule 5 to do so.

11. This Court must declare that it is William M. Windsor's right and obligation to send legally-required communications, and sending them is required by the federal rules and does not violate the TOP.

12. William M. Windsor prays that this Court enter an order declaring that he is not violating any criminal law by sending legal service copies to the Appellees in this appeal or to the parties in any legal action. Otherwise, 66-year-old Windsor is destined to die in the Montana State Prison by filing and prosecuting this appeal. Three filings today will get him six years in the Pen.

Submitted, this 13th day of February, 2015.

A handwritten signature in black ink, appearing to read "William M. Windsor", written in a cursive style.

William M. Windsor
110 East Center Street #1213, Madison, SD 57042,
windsorinmontana@yahoo.com, 770-578-1094

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

William M. Windsor	§	No. 14-36042
Plaintiff – Appellant,	§	
v.	§	D.C. No. 9:13-cv-00311-DLC
Sean M. Boushie, University of	§	U.S. District Court for Montana,
Montana, John Does 1-100,	§	Missoula
Defendants – Appellees.	§	

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing MOTION by depositing
the same with the United States Postal Service with sufficient postage:

University of Montana, c/o Office of Legal Counsel
University Hall 133. University of Montana. Missoula, MT 59812

Sean Boushie c/o Quentin M. Rhoades, Rhoades & Siefert, 430 North
Ryman, second Floor, Missoula, Montana 59802

Sean Boushie c/o Judge John W. Larson, Fourth Judicial District Court,
Missoula County Courthouse, 200 West Broadway, Missoula, Montana
59802

Submitted this 13th day of February, 2015,



William M. Windsor
110 East Center Street #1213, Madison, SD 57042,
windsorinmontana@yahoo.com, 770-578-1094

Exhibit

D

FILED

UNITED STATES COURT OF APPEALS

MAR 10 2015

FOR THE NINTH CIRCUIT

MOLLY C. DWYER, CLERK
U.S. COURT OF APPEALS

WILLIAM M. WINDSOR,

Plaintiff - Appellant,

v.

SEAN M. BOUSHIE and UNIVERSITY
OF MONTANA,

Defendants - Appellees.

No. 14-36042

D.C. No. 9:13-cv-00311-DLC
District of Montana,
Missoula

ORDER

Before: Peter L. Shaw, Appellate Commissioner

The court is in receipt of appellant's motion for approval of service. Pursuant to Federal Rule of Appellate Procedure 25(b), appellant may serve copies of all documents filed in this court pertaining to this appeal upon appellees at the address of record shown on the court's docket.

Appellant's motion for an extension of time to file the opening brief is granted. The opening brief is due April 15, 2015.

The answering brief is due May 15, 2015. The optional reply brief is due within 14 days after service of the answering brief.